

DOCKET NO. \_\_\_\_\_

IN THE  
SUPREME COURT OF THE UNITED STATES  
OCTOBER TERM, 2018

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MICHAEL LEE ROBINSON

Petitioner,

vs.

STATE OF FLORIDA,

Respondent.

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**UNOPPOSED APPLICATION FOR SIXTY (60) DAY EXTENSION OF TIME IN  
WHICH TO FILE PETITION FOR WRIT OF CERTIORARI TO THE FLORIDA  
SUPREME COURT**

COMES NOW THE PETITIONER, MICHAEL LEE ROBINSON, by and through undersigned counsel, and pursuant to Supreme Court Rule 13-5, respectfully requests an extension of time of sixty (60) days within which to file his Petition for Writ of Certiorari to the Florida Supreme Court. In support of his request, Petitioner, through counsel, states as follows:

1. Petitioner is an indigent death-sentenced inmate in the custody of the State of Florida. Undersigned counsel represents Petitioner in his state collateral appeals.
2. This case involves an appeal from the decision of the Florida Supreme Court denying Mr. Robinson's Successive Motion for Post-Conviction Relief pursuant to Florida Rule of Criminal Procedure 3.851.

3. This Court's jurisdiction rests on 28 U.S.C. §1257(a).
4. Petitioner was convicted of murder and sentenced to death in the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida.
5. On December 20, 2018, the Florida Supreme Court denied Mr. Robinson's appeal of the denial of his successive motion for post-conviction relief. (Attachment A). A motion for rehearing was not filed. Petitioner's time to petition for certiorari in this Court expires on March 20, 2019.
6. Petitioner shows the following good cause in support of this request.
7. Petitioner's counsel, the undersigned, are employed by a state agency and have had a burdensome caseload since the final disposition of Petitioner's case in the Florida Supreme Court. Within the next thirty days, Petitioner's counsel has a comprehensive initial state post-conviction motion due, a two week evidentiary hearing, as well as a contested intellectual disability evaluations and hearings on a separate client, both of which involve multiple trips with experts for the evaluations, as well as extensive document collection and distribution. Moreover, Petitioner's counsel is in the middle of contested competency proceedings on another client. As a result of all of the above, counsel have not been able to prepare a proper Petition for a Writ of Certiorari in Petitioner's case.
8. Counsel for the Respondent advised on February 19, 2019, that she does not oppose the relief sought herein.

WHEREFORE, Petitioner, through his undersigned counsel, respectfully requests an extension of time of sixty (60) days within which to file the Petition for Writ of Certiorari to the Florida Supreme Court in the above-styled case.

/s/ Chelsea Shirley  
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I HEREBY CERTIFY that a true copy of the foregoing motion has been furnished to the Supreme Court of the United States via electronic service and UPS and furnished by United States Mail, first class postage prepaid, to all counsel of record on February 19, 2019.

/S/ Chelsea Shirley  
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