

IN THE
SUPREME COURT OF THE UNITED STATES

QUONSHAY MASON, Petitioner,

VS.

DEWAYNE BURTON, Respondent.

MOTION FOR EXTENSION OF TIME

PURSUANT TO RULE 30

Petitioner, Quonshay Mason, proceeding In Propria Persona, and pursuant to Rule 30 of the United States Supreme Court, requests an enlargement of time for an additional thirty (30) to forty-five (45) days within which to file a Petition for Writ of Certiorari, and states the following in support thereof:

1. I am the Petitioner in the herein cause of action;
2. That I am currently housed at the Muskegon Correctional Facility, located at 2400 S. Sheridan Rd., in Muskegon, Michigan 49444; and
3. that extraordinary circumstances exist to warrant an extension of thirty (30) to forty-five (45) days; and
4. That the Sixth Circuit Court of appeals ruled against me on December 21, 2017, at which time I was represented by retained counsel. Since that time I have engaged in continuous communications with counsel in an effort to come to financial terms for his continued representation to facilitate either a Motion for Rehearing Enbanc, or to file a Petition for Writ of Certiorari. After coming to terms with counsel on how to proceed, my financial situation completely dissolved leaving me without the necessary financial backing to

fulfill the terms of the agreement that I had reached with counsel. [NOTE: During this period of time, my attorney was out of his office conducting a trial, while simultaneously his Associate was struck down by the influenza virus that plagued the entire country and no one was available to participate in the negotiating process for over a period of nearly four (4) weeks, which consumed a significant portion of the time allotted to file a Petition for Writ of Certiorari in this Court. An offer of proof of this assertion is being sought at the present time and Petitioner respectfully asks the Court not to decide against him in this motion until he has had the opportunity to obtain said proof and submit it to the Court within the next five (5) days.]

5. That after coming to the realization that I could no longer afford representation I began to research the issues and the applicable Court Rules to file a Petition for Writ of Certiorari pro per. However, because of the various nuances of applicable laws and rules governing the proposed action, as a layman it has been extremely difficult for me to grasp and understand the mechanisms of litigating under this particular system of jurisprudence. Furthermore, because I am an inmate within the confines of the Michigan Department of Corrections I am totally dependent on the LEXIS computer system that the Department employs to give inmates access to legal research. Unfortunately, this system has been down for the past seven (7) days while I was in the middle of researching and perfecting my Petition. [NOTE: As of this writing the computer system is still down and there is no alternative means to access legal material, i.e. books, Reporters, etc., as the LEXIS system is the only search engine provided for inmates after all of the hard copies were removed from the law libraries statewide.

6. That forty-five (45) days would be a sufficient number of days to complete my research, finish preparing the Petition and submit it to the Court.

7. That the issues I intend to submit are meritorious, having been granted a Certificate of Appealability in the Sixth Circuit, and warranting of this Court's input.

Respectfully Submitted,

Date: March 16, 2018

/s/ Quonshay Mason

PROOF OF SERVICE

I, Quonshay Mason, declare that on this date, March 16, 2018, as required by the Supreme Court Rule 29, I have served the enclosed "Motion for Extension of Time" w/ Proof of Service attached hereto on the opposing party to the above-entitled proceeding, via that party's counsel of record, by completing an "Expedited Legal Mail" form and submitting it to my institutional prison counsel, in a standard envelope addressed thusly:

Bill Schuette, Atty. Gen.
Michigan Attorney General
Attorney for the Respondent
Michigan Department of Attorney General
P.O. BOX #30217
Lansing, Michigan 48909

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED: 3-16-2018

/s/ Quonshay Mason