

DOCKET NUMBER: \_\_\_\_\_

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IN THE SUPREME COURT OF THE UNITED STATES

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MR. DION TAYLOR,

*Petitioner,*

v.

UNITED STATES OF AMERICA

*Respondent.*

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**PETITIONER'S MOTION FOR SIXTY DAY EXTENSION OF TIME  
IN WHICH TO FILE  
PETITION FOR WRIT OF *CERTIORARI***

BLAKE P. SOMERS (0078006)  
Appointed Counsel for Petitioner Taylor  
Blake P. Somers LLC  
114 East 8<sup>th</sup> Street  
Cincinnati, Ohio 45202  
513.587.2892  
513.621.2525 (Fax)  
513.702.1448 (24 hour cell)  
[Blake@BlakeSomers.com](mailto:Blake@BlakeSomers.com)

*Addressed to the Honorable Elena Kagan,  
as Circuit Justice for the Sixth Circuit Court of Appeals*

IN THE SUPREME COURT OF THE UNITED STATES

MR. DION TAYLOR	:	DOCKET NUMBER:
	:	
<i>Petitioner,</i>	:	
	:	
v.	:	PETITIONER'S MOTION FOR
	:	SIXTY (60) DAY EXTENSION OF
UNITED STATES OF AMERICA	:	TIME IN WHICH TO FILE
	:	PETITION FOR WRIT
<i>Respondent.</i>	:	<u>OF <i>CERTIORARI</i></u>

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Now comes Petitioner, Mr. Dion Taylor, by and through his appointed and undersigned counsel, pursuant to Supreme Court Rule 13.5, who hereby respectfully moves this honorable Court for a sixty-day extension of time in which to file his Petition for Writ of *Certiorari*. Mr. Taylor contacted counsel via email, and after the close of business hours on July 23, 2018, indicating, for the first time, that he wishes to file a Petition for a Writ of *Certiorari* to challenge the Decision in his case which issued from the Sixth Circuit Court of Appeals on May 1, 2018. Such a Petition, in order to be considered timely, would need to be postmarked no later than Monday, July 30, 2018. However, undersigned counsel lacks sufficient time to prepare an appropriate Petition on such short notice, and in so short of a time frame. As such, Mr. Taylor respectfully moves this honorable court for a sixty-day extension of time in which to file this Petition, thus making the new due date on or before

September 28, 2018. Mr. Taylor recognizes that this Motion is filed inside of the “10 day deadline” established by Supreme Court Rule 13.5, however, counsel was not alerted of Mr. Taylor’s intentions regarding a *certiorari* Petition until after the “10 day deadline” had already expired.

In compliance with Supreme Court Rule 13.5, Mr. Taylor states that the requested review would be of the Sixth Circuit’s decision dated May 1, 2018, a copy of which is attached hereto. In further compliance with Rule 13.5, Mr. Taylor states that basis for jurisdiction 28 U.S.C. §1254.

Wherefore, and for all of the foregoing reasons, Mr. Taylor respectfully moves this honorable Court for a sixty-day extension of time in which to file this Petition, thus making the new due date on or before September 28, 2018.

Respectfully Submitted,

/s/ Blake P. Somers  
Blake P. Somers (Ohio Bar #0078006)  
Appointed Counsel for Petitioner Taylor  
BLAKE P. SOMERS llc  
114 E. 8<sup>th</sup> Street  
Cincinnati, Ohio 45202  
513.587.2892  
513.621.2525 (Fax)  
513.702.1448 (24 hour cell)  
Blake@BlakeSomers.com

## CERTIFICATE OF SERVICE

I hereby certify that two true and accurate copies of the foregoing were served this 24th Day of July, 2018, via overnight FedEx delivery service, postage prepaid, upon the following persons:

Charles P. Wisdom, Jr.,  
Gary Todd Bradbury  
John Patrick Grant  
Office of the U.S. Attorney  
260 W. Vine Street  
Suite 300  
Lexington, KY 40507-1612

Matthew McGavock Robinson  
Attorney for Navarius Westberry  
Robinson & Brandt  
629 Main Street  
Suite B  
Covington, KY 41011

Stephen D. Milner  
Attorney for Benjamin Robinson  
Hughes, Lowry, Milner & Hayworth  
271 W. Short Street  
Suite 812 Security Trust Building  
Lexington, KY 40507

Solicitor General of the United States  
Room 5616  
Department of Justice  
950 Pennsylvania Avenue, N.W.,  
Washington, DC 20530-0001

/s/ Blake P. Somers  
Blake P. Somers (Ohio Bar #0078006)  
Appointed Counsel for Petitioner Taylor