

DOCKET NUMBER: _____

IN THE SUPREME COURT OF THE UNITED STATES

MR. DION TAYLOR,

Petitioner,

v.

UNITED STATES OF AMERICA

Respondent.

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

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*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 CERTIORARI</u>

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)

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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:

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