

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

YASEEN ABDUL-WAHAB — PETITIONER

vs.

UNITED STATES OF AMERICA — RESPONDENT(S)

MOTION FOR AN EXTENSION OF TIME TO FILE
A PETITION FOR A WRIT OF CERTIORARI TO

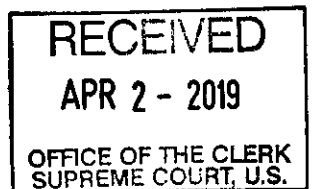
UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

MOTION FOR AN EXTENTION OF TIME

YASEEN ABDUL-WAHAB #13409-104

Talladega FCI Federal Correctional

P.M.B. 1000 Talladega, AL 35160



IN THE
SUPREME COURT OF THE UNITED STATES

YASEEN ABDUL-WAHAB, undersigned petitioner/appellant herein, submits this motion pro se, seeking the Court to grant an Extension Of Time in which to perfect and file a WRIT OF CERTIORARI, pursuant to Rule(s) 13.5 and 30.2 of the Supreme Court of the United States. The basis of this request arises from the denial by the Court of Appeals for the Eleventh Circuit of petitioners request for a Panel Rehearing, (USA V. YASEEN ABDUL-WAHAB, Case No. -17-14547-GG, December 28,2018). Jurisdiction of this Court is invoked under 28 U.S.C. §2154(1).

Petitioners efforts to perfect and file a Petition For A Writ Of Certiorari have been hampered due to a series of events beyond the petitioners control, such as being given a minimum security transfer designation, by the Federal Bureau Of Prisons (FBOP). Additionally, petitioners current location facility Federal Prison Camp, Talladega (FPC-TDG) has been obstructing petitioner by withholding for Seven (7) weeks the petitioners transfer property, which contained [s] petitioners legal discovery and research material/notes, as well as Court Ordered transcripts/documents.

The administration and Unit Team at FPC-TDG thereafter continually ignored petitioners numerous requests for access to his legal material. After petitioners many unanswered emails and verbal requests to both the Unit Team and Executive Staff (of FPC-TDG) in a due diligence att-

empt at gaining access to the Court , petitioner was offered restricted access to his discovery, legal material and Court Ordered documents, ONLY if petitioner agreed to sign a stipulated memorandum drawn up by FPC - TDG's Executive Staff and executed by Senior Unit Team Staff.

In support thereof, petitioner asserts:

1. On December 7, 2018 Petitioner submitted a Petition for Rehearing (Ex. A)
2. December 28, 2018 the Petition for a Panel Rehearing was denied (Ex. B) by the Eleventh Circuit Court
3. On January 4, 2019 petitioner receives a lower security transfer by the FBOP and is transferred from FCC Forrest City, AR to the Oklahoma City, OK Transfer Center (OKTC)
4. Petitioner Notices the Court of FBOP transfer to OKTC (Ex. C)
5. On or about January 11, 2019 FBOP transfers petitioner to Atlanta USP
6. January 17, 2019 petitioners transfer property containing all of (Ex. D, D-1) his legal material and Court Ordered documents/transcripts arrive at FPC-TDG
7. On January 22, 2019 petitioner was transferred from Atlanta USP to FPC-Talladega, by FBOP
8. On February 8, 2019 petitioner emailed the R&D/mailroom supervisor (Ex. E) for FPC-TDG informing him of the sensitive nature involved while inquiring about his transfer property
9. On February 18, 2019 petitioner emailed the FPC-TDG Administrator (Ex. F) detailing his attempts to retrieve his transfer property via the Special Investigation Section (SIS) and R&D/mailroom supervisor were unsuccessful. Petitioner further explains the time sensitive nature of his legal status and the need to access his legal material
10. On February 21, 2019 petitioner emailed the FPC-TDG administrator (Ex. G) again in an attempt to follow-up on a verbal conversation from the day prior, regarding the urgency to access the Court Ordered documents, the time sensitive nature due to the Court imposed Ninty day deadline. Further that such continued denial of this legal material constituted a denial of access to the Court
11. On February 25, 2019 petitioner sent an email request for grievance (Ex. H) forms in an attempt to resolve the denial of property administratively
12. On March 1, 2019 petitioner was informed he had to sign a restrictive, stipulated Memorandum in order to gain access to his legal material(s) (Ex. I, ~~II~~)
13. On March 1, 2019 petitioner made two submissions requesting access (Ex. I-1, I-2) to his legal material, in accordance with the stipulated Memorandum, also dated March 1, 2019. Petitioner provided 72 and 98 hours notice, respectively. Requesting the two hours allotted and was denied access (after being approved) March 4th and provided only one hour of two requested and approved March 5th

Petitioner has steadfastly attempted to engage with the administration of FPC-TDG to gain access to his legal reference material in order to timely file A PETITION FOR A WRIT OF CERTIORARI, prior to or by the due date of March 28, 2019. Unfortunately due to circumstances beyond his control and the denial and then restrictive nature that petitioner has endured as a result of the staff at FPC-TDG has forced him to seek an enlargement of time in which to perfect and submit a timely Petition For Writ Of Certiorari. Petitioner is not versed in criminal law and procedures and as a result requires substantial assistance via time in order to file.

Petitioner also faces additional challenges, as the administrative staff continually treats petitioners Constitutionally protected Rights of Due Process and access to the Courts as a privillage. This is evident when attention is paid to the requests made by petitioner, the amount of time petitioner is allowed access to legal material(s) and the facilities very inconsistant patern of honoring the terms of it's own restrictive agreement.

The accountability log that details the dates and times petitioner has gained access and for what duration is a testament to the difficulties (Ex.J). Petitioner is not allowed to possess any of the Cort Ordered transcripts, or legal material, his research notes or exhibits. This is not however, the situation with any other prisoner detained at FPC-TDG. It is for these reasons that petitioner seeks the Court to grant an extension for time to perfect and file A Petition For a Writ Of Certiorari. Petitioner is at a disadvantage and cannot possibly develop a cogent Petition when he is denied meaningful access to the transcribed records.

WHEREFORE, the Petitioner, YASEEN ABDUL-WAHAB, based upon the foregoing, believes that he has demonstrated an extraordinary need due to circumstances beyond his control to be granted an extension of time in which to perfect and file A Petition For A Writ Of Certiorari and request this that this Justice allows him Sixty (60) days of an enlargement of time.