

No. _____

In the Supreme Court of the United States

NAPIER SANDFORD FULLER,

Petitioner,

v.

STATE OF NORTH CAROLINA

Respondent.

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

TO THE SUPREME COURT OF NORTH CAROLINA

To the Honorable John G. Roberts, Jr.
Chief Justice of the United States Supreme Court
and Circuit Justice for the Fourth Circuit

for Petitioner

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To the Honorable John G. Roberts, Jr.
Chief Justice of the United States Supreme Court
and Circuit Justice for the Fourth Circuit

JURISDICTION FOR AN EXTENSION OF TIME

1. The self-represented Petitioner, NAPIER SANDFORD FULLER, respectfully requests an extension of time of 60 days to file a Petition for Writ of Certiorari pursuant to Rules of the Supreme Court of the United States, 13.5, and 28 U.S.C. § 2101(c).
2. The jurisdiction of this Court pursuant to 28 U.S.C. § 1257(a).
3. The self-represented Petitioner is seeking review of the North Carolina Supreme Court's Order of February 22nd 2018 that had the effect of denying the Petitioner federally mandated disability accommodations at his own trial, related to Petitioner's role as a *pro se* litigant and setting binding-case law that no accommodations would be granted in the future. See attached *Exhibits A, B and C*.
4. Pursuant to Rules of the Supreme Court of the United States, 10(c) the current deadline for Petitioner to file a writ of certiorari is Thursday, May 23rd 2019, which is ninety days after the entry of the North Carolina Supreme Court Orders adverse to Petitioner.
5. Petitioner makes this request more than ten (10) days before the day when his petition would be due without an extension of time.

6. Petitioner filed a Notice of Appeal with the North Carolina Supreme Court on March 24th 2019 that indicated Petitioner's intent to seek further legal review in the Supreme Court of the United States.

7. However, Petitioner's standing to appeal herein is via review of the North Carolina Supreme Court's Order of February 22nd 2018 and for no other decree.

TWO REASONS FOR AN EXTENSION OF TIME

8. Pursuant to the Rules of the Supreme Court of the United States, 13.5, "an application to extend the time to file shall set out the basis for jurisdiction in this Court, identify the judgment sought to be reviewed, include a copy of the opinion and any order respecting rehearing, and set out specific reasons why an extension of time is justified."

9. The specific reasons that an extension of time is justified are twofold: (i) Petitioner reads and writes more slowly than others due to a mental impairment and (ii) Petitioner lacks formal legal training and, therefore, seeks more time to research the legal issues and *pro bono* assistance.

10. The first reason that an extension of time is justified: Petitioner has a mental impairment that substantially limits his major life activities: (i) A.D.H.D.¹ being specifically listed in 28 C.F.R. § 35.108(b)(2), (ii) there is a medical record of Petitioner's impairment dating from 1990, and (iii)

¹ See National Institute of Health, A.D.H.D. entry:
<https://www.nimh.nih.gov/health/topics/attention-deficit-hyperactivity-disorder-adhd/index.shtml>

Petitioner is regarded as having received ADA accommodations in the past from the State of North Carolina and other entities such as Washington University in St. Louis, Harvard University, and the Massachusetts Institute of Technology in compliance with federal disability laws, and (iv) Petitioner is still being treated for this condition that impairs his cognitive and behavioral function.

11. Petitioner therefore requests this Court to consider this petition for more time to complete the Petition for Writ of Certiorari in light of the concept of “reasonable accommodations” as defined in the Americans with Disabilities Act of 1990 (42 U.S. Code 12131–12134) and its implementing regulations.
12. The second reason why an extension of time is justified: Petitioner needs more time to review the case law, to seek assistance from *pro bono* legal aid groups, and to organize potential *amicus curiae* briefs.

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