No. _____

IN THE SUPREME COURT OF THE UNITED STATES
October Term, 2018

SHERMAN EDWARD WILLIAMS,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

MOTION FOR EXTENSION OF TIME TO FILE PETITION
FOR WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

Nicole M. Kaplan
Georgia Bar No. 382495

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Attorney for Sherman Edward Williams

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UNITED STATES OF AMERICA,
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MOTION FOR EXTENSION OF TIME TO FILE
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TO THE HONORABLE CLARENCE THOMAS, Associate Justice

of the Supreme Court of the United States, and Circuit Justice for the

United States Court of Appeals for the Eleventh Circuit:

Petitioner Sherman Edward Williams, a prisoner acting by and

through undersigned counsel and pursuant to 28 U.S.C. § 2101(c) and

Supreme Court Rule 13.5, respectfully requests an extension of time of

thirty (30) days to file his Petition for a Writ of *Certiorari* in this Court. Mr.

Williams seeks review of the decision of the United States Court of Appeals

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for the Eleventh Circuit entered on May 21, 2018, *see* Attachment A. Mr.

Williams invokes the jurisdiction of this Court pursuant to 28 U.S.C. §

1254(1). His time to file a Petition for Writ of *Certiorari* in this Court elapses

on August 20, 2018. Mr. Williams makes this request more than ten (10)

days before the date his petition would be due without an extension of

time. This is his first request for an extension of time. In support of his

request, Mr. Williams shows the following as good cause:

Mr. Williams's case presents an important issue unresolved by

many circuits regarding whether the residual clause of section 924(c) is

unconstitutionally vague, post-*Johnson* and *Dimaya*. *Sessions v.

Dimaya*, __ U.S. __. 138 S.Ct. 1204 (2018); *Johnson v. United States*, __

U.S. __, 135 S.Ct. 2551 (2015). It also raises the separate question of

whether federal bank robbery categorically has as an element the use of

"violent" physical force required to satisfy *Curtis Johnson v. United
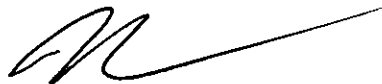
States*, 559 U.S. 133, 140, 130 S.Ct. 1265 (2010).

Counsel request an extension of time to seek review in this Court

so that counsel can properly and adequately present the substantial

constitutional issues that give rise to Mr. Williams's petition and

effectively represent Mr. Williams. Counsel also need additional time to consult with Supreme Court experts in the preparation of the Petition.

In the time since Mr. Williams's case was decided in the Eleventh Circuit, undersigned counsel, Nicole M. Kaplan, has been actively engaged representing other clients at the Federal Defender Program, both in the district court and at the Eleventh Circuit Court of Appeals. This has limited counsel's ability to prepare an effective petition by the current deadline. Counsel requires additional time to complete the Petition in this case.

WHEREFORE, Mr. Williams respectfully requests that this Court grant him a thirty (30) day extension of time within which to file his Petition for Writ of Certiorari, until and including September 19, 2018.

Respectfully submitted, this 1st day of August, 2018.

Nicole M. Kaplan
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Attorney for Mr. Williams

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the forgoing on

counsel for the Respondent Warden Sellers by placing a copy of same in

the United States Mail, First Class Postage pre-paid and addressed as

follows:

> Dashene Cooper
> Jill E. Steinberg
> U.S. Attorney's Office
> 75 Ted Turner Dr., S.W., Ste 600
> Atlanta, Ga 30303

Dated this, the 1st day of August, 2018.

_____
Nicole M. Kaplan
Georgia Bar No. 382495