

No. _____

IN THE

Supreme Court of the United States

GALE ZAMORE,

Petitioner,

V.

DEUTSCHE BANK NATIONAL TRUST COMPANY,
individually, and as Trustee for JP Morgan Mortgage Acquisition Trust
2007-CH5 Asset Backed Pass-Through Certificates Series 2007-CH5,
SELECT PORTFOLIO SERVICING, INC..

Respondent.

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

TO THE HONORABLE CLARENCE THOMAS, ASSOCIATE JUSTICE OF THE SUPREME COURT OF THE UNITED STATES AND CIRCUIT JUSTICE FOR THE ELEVENTH CIRCUIT:

Pursuant to Supreme Court Rule 13.5, Petitioner, Gail Zamore, respectfully requests a 30-day extension of time within which to file a petition for writ of certiorari to review the decision of the Eleventh Circuit Court of Appeal for the United States, dated March 25, 2019 in *Zamore v. Deutsche Bank Nat'l. Trust Co., etc.*, 18-13635 (Exhibit A). The jurisdiction of this Court will be invoked under 28 U.S.C. 1254(1).

1. The petition for writ of certiorari is due in 10 days, on June 24, 2019.
2. Since the Eleventh Circuit affirmed the dismissal of Petitioner's Complaint on March 25, 2019, Petitioner's lead counsel has had a number of professional obligations that have prevented him from completing the petition. Those circumstances include: (1) preparing Florida Supreme Court jurisdictional brief for the appeal of *Hanna v PennyMac Holdings*

LLC, 4D18-1400 which is due on the same day as the petition at bar; (2) preparing a reply brief in *Knezel v. Wilmington Savings Fund Society FSB, etc.*, 2D18-3222 which is due on the same day as the petition in the case at bar; (3) preparing to attend oral argument on June 18, 2019 before the Fourth District Court in *Prestige Home Buyers. LLC v. The Bank of New York Mellon*, 4D18-3250; (4) preparing a motion for rehearing filed April 25, 2019 in *Hanna v PennyMac Holdings LLC*, 4D18-1400; (5) preparing a reply brief filed in *Prestige Home Buyers. LLC v. The Bank of New York Mellon*, 4D18-3250 on May 2, 2019; (6) preparing a reply brief filed May 6, 2019 in *Hanna v. Nationstar Mortgage LLC*, 4D18-2660; (7) preparing a reply brief filed June 10, 2019 in *Montwill v. Lasalle Bank, N.A. etc*, 2D18-2553 which involved a Record of over 6,000 pages.

3. Additionally, over the course of the last few months, lead counsel has had a heavy caseload to work on which includes attending various trials, conducting various depositions, and attending daily court hearings.

4. Further still, lead counsel, James R. Ackley, Esq., – who is not yet admitted to the U.S. Supreme Court Bar – has been working diligently to meet the requirements for application to the bar and is hoping to be admitted before the Petition is due.

5. Accordingly, Petitioner requires additional time to prepare an appropriate petition for consideration by this Court and for lead counsel to be admitted to the U.S. Supreme Court Bar.

6. Respondent has agreed to a thirty (30) day extension.

For the foregoing reasons, Petitioner hereby requests that an extension of time, to and including Wednesday, July 24, 2019, be granted within which to file a petition for writ of certiorari.

Respectfully submitted,
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