

NO. \_\_\_\_\_

THE SUPREME COURT  
OF THE UNITED STATES

---

ZACHARY B. TAYLOR,

Petitioner,

v.

STATE OF GEORGIA,

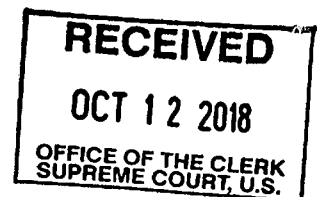
Respondent.

---

**Zachary B. Taylor's Application to Justice Clarence Thomas to  
Extend Time to File Petition for Writ of Certiorari to  
Review Judgment of the Supreme Court of Georgia**

ZACHARY BOUVIER TAYLOR  
Augusta State Medical Prison  
3001 Gordon Highway  
Grovetown, Ga. 30813  
(706) 855-4781

*Pro Se* Petitioner



Pursuant to Supreme Court Rules 22 and 30, the undersigned petitioner, Zachary B. Taylor (hereinafter, "Mr. Taylor"), an inmate at the Augusta State Medical Prison, applying *pro se*, requests a sixty (60) day extension of time to file a Petition for Writ of Certiorari seeking review of the decision of the May 7, 2018 decision of the Supreme Court of Georgia. The case was styled as *Zachary B. Taylor v. State of Georgia*, Docket No. S18A0276 in the lower court and a copy of the decision is attached to this application.

***Background***

Mr. Taylor was convicted at trial of Murder, Aggravated Assault and Aggravated battery on February 24, 2015. He was sentenced to life in prison. He filed a timely appeal of his conviction to the Georgia Supreme Court, which affirmed the conviction on May 7, 2018. This is the decision Mr. Taylor seeks to review by way of a petition for writ of certiorari to this Court. A copy of the decision is enclosed.

***Procedural Background***

The time for Mr. Taylor, the undersigned petitioner, to file his petition for a writ of certiorari, excluding holidays, was on or about August 7, 2018. On July 26, 2018, Mr. Taylor, through counsel, applied for an extension of time to file his petition. The application was returned because it did not include a declaration of mailing, and the accompanying cover letter of the Clerk further noted that this application, if filed in a representative capacity, must be made by an attorney admitted to the Bar of this Court. (*See* Declaration of Leon Jacobson and returned application for an extension of time to file writ of certiorari, attached hereto as "Exhibit A".) Mr. Taylor now submits the present application, *pro se*, because being incarcerated, he needed additional time to acquire counsel meeting the admission criteria, which he is currently in the process of retaining. This application is timely made pursuant to Rule 30(1), as Mr. Taylor's initial application was timely filed by counsel on July 26, 2018, (*see* Affirmation of Leon Jacobson, Esq., attached hereto as "Exhibit B") and requests an

extension up to and including Monday, October 8, 2018, or the latest eligible extension date as determined by the Court.

Mr. Taylor respectfully asks Justice Thomas, as Circuit Justice for the Eleventh Circuit, to extend the time for him to file a petition for writ of certiorari. Mr. Taylor requests that the deadline be extended by sixty (60) days, so that the new deadline, excluding weekends and holidays, would be Monday, October 8, 2018.

Mr. Taylor's request satisfies the express procedural requirements of Supreme Court Rule 14.5(g)(i). This Court would have subject matter jurisdiction to hear Mr. Taylor's petition because he asserts claims under the Sixth and Fourteenth Amendments to the U.S. Constitution, and *Batson v. Kentucky*, 476 U.S. 79 (1986).

The judgment that Mr. Taylor seeks to review is the Georgia Supreme Court's May 7, 2018 decision affirming his judgment and conviction for Murder, Aggravated Assault and Aggravated battery. He was sentenced to life in prison. A copy of the decision is enclosed. **(See Exhibit A.)**

Mr. Taylor's present application is timely made because his initial application for extension was filed more than ten days before the deadline of his petition and is sought for good cause.

***Good Cause***

Undersigned petitioner recognizes that extensions of time to file a petition for writ of certiorari are not favoured, and that a request for an extension requires good cause. Good cause exists to grant this request for any of following three reasons.

First, Mr. Taylor is incarcerated in a state prison and requires more time and special assistance in making applications and petitions of this nature, and in acquiring qualified counsel, than a petitioner who is not incarcerated, and/or represented by counsel.

Second, extraordinary circumstances are present in this case in that Mr. Taylor was recently transferred to Augusta State Medical Prison ("ASMP"), a Georgia facility that "provide[s] centralized acute, specialized medical and Level IV Mental Health services for male and female offenders primarily as transient, [and] house[s] severe medical cases." (*See* ASMP website.<sup>1</sup>) The process of Mr. Taylor's transfer to ASMP—as well as the circumstances surrounding his admission there—have aggravated the difficulties of petitioning this Court even further, making it even more difficult for Mr. Taylor than for an ordinary inmate not presented with such circumstances.

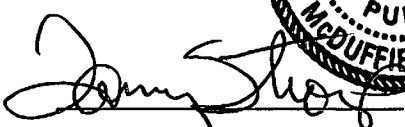
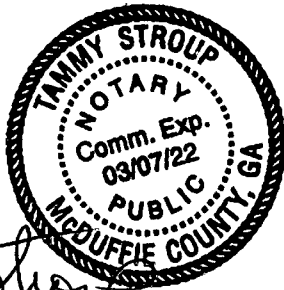
Third, Mr. Taylor certifies that, based upon his review and the advice of his previous counsel, his petition will raise important constitution questions that this Court should address arising from the lower court's erroneous application of *Batson*.

Undersigned petitioner certifies that his decision to ask for an extension of time is not for purposes of delay, but to permit petitioner adequate time to retain a duly qualified Supreme Court practitioner, and prepare and finalize the petition. There is no prejudice to the State from granting of this request.

Accordingly, for all the foregoing reasons as summarized above, Mr. Taylor respectfully asks Justice Thomas to extend the time for him to file a petition for writ of certiorari up to and including Monday, October 8, 2018.

This application is submitted on 2 OCT, 2018.

NOTARY:

Respectfully submitted,

  
Zachary Bouvier Taylor

<sup>1</sup> [http://www.dcor.state.ga.us/GDC/FacilityMap/html/S\\_50000190.html](http://www.dcor.state.ga.us/GDC/FacilityMap/html/S_50000190.html)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was mailed this 27 day of September

2018 via first-class mail postage prepaid addressed as follows:

Attn: JEFF ATKINS  
Clerk of the Court  
SUPREME COURT OF THE UNITED STATES  
1 First Street, NE  
Washington, DC 20543

Assistant Attorney General  
Georgia Department of Law  
40 Capital Square, SW  
Atlanta, GA 30303

  
Zachary Bouvier Taylor

NO. \_\_\_\_\_

THE SUPREME COURT  
OF THE UNITED STATES

ZACHARY B. TAYLOR,

Petitioner,

v.

STATE OF GEORGIA,

Respondent.

DECLARATION OF LEON JACOBSON

Leon Jacobson declares under the penalty of perjury that the foregoing is true and correct:

I filed the attached Application to Extend Time to File Petition for a Writ of Certiorari in the above-captioned matter, by first class mail, affixing first-class postage prepaid, and depositing the same into a depository bearing the emblem of the United States Post Service on July 26, 2018, addressed as follows:

Clerk of the Court  
United States Supreme Court  
Supreme Court of the United States  
1 First Street, NE  
Washington, DC 20543

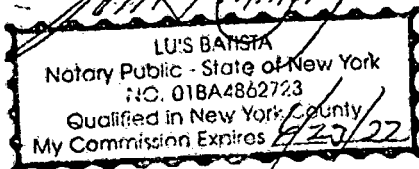
Ms. Lalaina Briones  
104 Marrietta Street NW, Suite 400  
Atlanta, GA 30303-2743

State of New York, County of Kings, ss:

Subscribed and sworn to before me on this 20th

Day of Sept. in the year 2018

Executed on this 20<sup>th</sup> day of September, 2018.



Leon Jacobson

**Additional material  
from this filing is  
available in the  
Clerk's Office.**