

DOCKET No. \_\_\_\_\_

IN THE SUPREME COURT OF THE UNITED STATES

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TAVARES J. WRIGHT,

Petitioner

VS.

STATE OF FLORIDA,

Respondent.

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**AMENDED APPLICATION FOR SIXTY (60) DAY EXTENSION OF TIME IN WHICH  
TO FILE PETITION FOR WRIT OF CERTIORARI  
TO THE SUPREME COURT OF FLORIDA ADDRESSED  
TO JUSTICE CLARENCE THOMAS**

COMES NOW THE PETITIONER, Tavares J. Wright, by and through undersigned counsel, and pursuant to Supreme Court Rule 13-5, and respectfully requests an extension of time of sixty (60) days to file his Petition for Writ of Certiorari to the Supreme Court of Florida. In support of his request, Petitioner, through counsel, states as follows:

1. Mr. Wright is an indigent death-sentenced inmate in the custody of the State of Florida. Mr. Wright was convicted of murder in the Circuit Court of the Tenth Judicial Circuit in and for Polk County, Florida.

2. Undersigned counsel was appointed to represent Mr. Wright in the Circuit Court of the Tenth Judicial of Florida, the Supreme Court of Florida, and the United States District Court for the Middle District of Florida. Additionally, undersigned counsel was counsel of record for

Petitioner's previous Petition for Writ of Certiorari to the Supreme Court of Florida filed in August of 2017, which resulted in an Order from this Court granting Petitioner's writ of certiorari, vacating the judgment, and remanding the case to the Florida Supreme Court for further consideration in light of *Moore v. Texas*, 137 S. Ct. 1039 (2017).

3. This case involves the opinion of the Florida Supreme Court reaffirming the denial of Petitioner's intellectual disability claim following this Court's remand for further consideration in light of *Moore v. Texas*, 137 S. Ct. 1039 (2017).

4. Mr. Wright will file a Petition for Writ of Certiorari in this Court.

5. The Florida Supreme Court's opinion reaffirming the denial of Petitioner's intellectual disability claim following this Court's remand for further consideration in light of *Moore v. Texas*, 137 S. Ct. 1039 (2017) was issued on September 27, 2018. (Attachment A). Mr. Wright filed a Motion for Rehearing and for Clarification, which was denied on November 1, 2018, the same date the Florida Supreme Court issued a corrected opinion. (Attachment B). Calculating the time for Mr. Wright to file a Petition for Writ of Certiorari, the 90th day would fall on January 30, 2019.

6. This Court has jurisdiction based on 28 U.S.C. §1257.

7. Undersigned counsel is employed by the Law Office of the Collateral Regional Counsel-Middle Region, (CCRC-M), a State of Florida governmental agency. While so employed, undersigned counsel has represented Mr. Wright since 2009. Undersigned counsel is uniquely qualified to draft the Petition for Certiorari based on her experience representing Mr. Wright in state and federal court.

8. Undersigned counsel was recently promoted to Chief Assistant Capital Collateral

Counsel Regional Counsel—Middle Region, and as a result has assumed many new administrative duties, in addition to supervising a team of capital postconviction attorneys and maintaining her own caseload. This has resulted in undersigned counsel having less time to devote to Mr. Wright's Petition for Writ of Certiorari.

9. Mr. Wright respectfully requests an extension of 60 days to file a Petition for Writ of Certiorari.

WHEREFORE, Petitioner, through his undersigned counsel, respectfully requests an extension of time of sixty (60) days within which to file the Petition for Writ of Certiorari to the Supreme Court of Florida in the above-styled case.

/S/ MARIA PERINETTI

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MARIA CHRISTINE PERINETTI

Florida Bar No. 0013837

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Lead Attorney for Petitioner

Counsel of Record

Member of the Bar of this Court