

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

**IN THE SUPREME COURT OF THE UNITED STATES**

---

**JOHN WILLIAM CAMPBELL,**

**Appellant,**

**vs.**

**STATE OF FLORIDA,**

**Respondent.**

---

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

PETITIONER, John William Campbell, respectfully requests an extension of time of sixty (60) days to file his Petition for Writ of Certiorari to the Supreme Court of Florida, pursuant to Supreme Court Rule 13. In support of his request, Petitioner states as follows:

1. Mr. Campbell is an indigent death-sentenced inmate in the custody of the State of Florida. Mr. Campbell was convicted of murder in the Circuit Court of the Fifth Judicial Circuit of Citrus County, Florida.
2. Undersigned counsel was appointed to represent Mr. Campbell in the Circuit Court of the Fifth Judicial of Florida and in the Supreme Court of Florida.
3. This case involves an appeal from the decision of the Supreme Court of Florida affirming the denial of Mr. Campbell's initial Motion for Post-Conviction Relief.
4. Mr. Campbell will file a Petition for Writ of Certiorari in this Court.

5. On November 29, 2018, the Supreme Court of Florida issued an opinion denying Mr. Campbell's appeal of his Motion for Post-Conviction Relief. (Attachment A). Calculating the time for Mr. Campbell to file a Petition for Writ of Certiorari, the 90th day would fall on February 27, 2019.

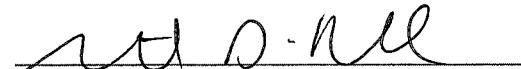
6. This Court has jurisdiction based on 28 U.S.C. § 1257.

7. Counsel is employed by the Law Office of the Collateral Regional Counsel-Middle Region, (CCRC-M), a State of Florida governmental agency. The CCRC-M has represented Mr. Campbell since 2015. Counsel is uniquely qualified to draft the Petition for Certiorari based on experience representing Mr. Campbell in Florida courts.

8. CCRC-M has experienced a loss of attorneys based on recent resignations and retirements. As a result, counsel's caseload has increased. The additional cases involve complex procedural histories and legal issues that counsel is attempting to become familiar with to provide proper representation to these new clients. Furthermore, lead counsel for Mr. Campbell on appeal before the Florida Supreme Court is pregnant and has been absent due to medical reasons.

WHEREFORE, Petitioner, John William Campbell, requests an extension of time of sixty (60) days to file the Petition for Writ of Certiorari to the Supreme Court of the Florida in this case.

Respectfully submitted,



Margaret S. Russell  
Counsel of Record  
Law Office of Capital Collateral Regional Counsel-Middle Region  
12973 N. Telecom Parkway  
Temple Terrace, FL 33637  
Tel: (813) 558-1600  
Email: [russell@ccmr.state.fl.us](mailto:russell@ccmr.state.fl.us)  
Secondary Email: [support@ccmr.state.fl.us](mailto:support@ccmr.state.fl.us)

Julie Morley  
Law Office of Capital Collateral Regional Counsel-  
Middle Region  
12973 N. Telecom Parkway  
Temple Terrace, FL 33637  
Tel: (813) 558-1600  
Email: [morley@ccmr.state.fl.us](mailto:morley@ccmr.state.fl.us)  
Secondary Email: [support@ccmr.state.fl.us](mailto:support@ccmr.state.fl.us)

February 12, 2019

Dated