

SUPREME COURT OF THE UNITED STATES

V

COMMONWEALTH OF MASSACHUSETTS

Supreme Court, U.S.

FILED

JAN 14 2019

OFFICE OF THE CLERK

MOTION TO EXTEND TIME TO FILE A WRIT OF CERTIORARI

Now comes the Petitioner, David Gould, pro-se, in the above entitled matter and respectfully moves this honorable court, pursuant to Rule 30.2 of the Rules of the Supreme Court of the United States, to allow additional time to file his Writ of Certiorari.

As grounds therefore, the Petitioner states as follows:

- (1) His appellate attorney failed to deliver necessary and required documents related to the case until January 11, 2019;
- (2) The law library at the Massachusetts' prison N.C.C.I Gardner has been closed much of the last two months due to staffing issues, see one attached informal grievance form. This staffing issue has greatly diminished access to necessary equipment and legal materials necessary for the proper filing of the writ.

As required:

- (a) The opinion of the Massachusetts Appeals Court has been attached, and behind that; (Rule 13.5)
- (b) the decision of the Massachusetts' Supreme Judicial Court (SJC) has also been appended. (Rule 13.5)
- (c) As per Rule 29.5, a 'Proof of Service' has been included with a motion to proceed in forma pauperis.

CERTIFICATE OF SERVICE

I hereby certify that on this day, the information stated above is true and is timely under Rule 30.1; 5 U.S.C. § 6103.

Dated February 15, 2019

Signed: David Gould
David Gould, pro se