

IN THE UNITED STATES
SUPREME COURT

KEVIN TERRELL TATUM *
(PETITIONER)

VS. * Cause No. 17-20787

LOXIE DAVIS,
DIRECTOR OF TDCJ-ID,
(RESPONDENT)

PETITIONER'S FIRST MOTION
FOR LEAVE FOR "EXTENSION OF TIME"
TO ADVANCE WRIT OF CERTIORARI

APPEAL FROM THE UNITED STATES,
COURT OF APPEALS, FIFTH CIRCUIT,
Cause No. 17-20787

To the Honorable Judges of Said Court:

PLEASE TAKE NOTICE THAT COMES NOW,
KEVIN TERRELL TATUM, Petitioner, Pro, Se, in
the above styled and numbered cause,
files this his "FIRST EXTENSION OF TIME TO
ADVANCE WRIT OF CERTIORARI" in good faith,
and in support thereof, your Petitioner
would present the following:

I.

PETITIONER ADVANCED AN APPEAL TO THE UNITED
STATES COURT OF APPEALS, FIFTH CIRCUIT,

CHALLENGING THE CONSTITUTIONALITY OF HIS CONFINEMENT,
ON THE ____ DAY OF ____ 2018. THE COURT, IN
AN ORDER DATED THE 20TH DAY OF DECEMBER 2018,
DENIED CERTIFICATE AND ~~REHEARING~~. PETITIONER
SEeks TO ADVANCE A WRIT OF CERTIORARI TO
CHALLENGE THE LOWER COURT RULING, CONTENDING
HIS CONVICTION WAS PATENTLY OBTAINED IN BREACH
OF THE U.S. CONSTITUTION, AND THAT THE LOWER
COURT'S RULING WAS DEBATABLE OR WRONG.
THE DEADLINE FOR ADVANCING SAID WRIT OF
CERTIORARI IS THE 20TH DAY OF MARCH, 2019.
PETITIONER REQUESTS A FORTY (40) DAY EXTENSION
TO ADVANCE HIS WRIT, FOR THE FOLLOWING REASONS:

III.

THE ISSUES ADVANCED IN THE WRIT ARE COMPLEX
AND WARRANTS ADDITIONAL TIME TO STUDY AND
PREPARE.

IV.

THE UNIT LAW LIBRARY PROVIDES 2-HOURS
PER DAY, MON-FRI, OF LAW LIBRARY TIME.
THE BOOKS NEEDED ARE OFTEN IN USE OF
OTHERS, WARRANTING WAITING FOR BOOKS AVAILABILITY.
IN ADDITION, AS A LAYMAN AT LAW, THE ISSUES
ARE FAR TOO DIFFICULT TO DISCERN AND REQUIRES
ADDITIONAL TIME AND STUDY TO PRESENT A PER-
SUASIVE ARGUMENT ON THE MERITS.

V.

THIS MOTION IS PRESENTED IN GOOD FAITH AND
NOT INTENDED TO VEX, HARASS OR OTHERWISE
DISRUPT COURT PROCEEDINGS. PETITIONER
PRESENTS THIS HIS MOTION TO ESTABLISH ADDITIONAL

TIME TO PRESENT RESEARCH AND A MORE THOROUGH
AND PERSUASIVE ARGUMENT ON THE MERITS OF HIS
CLAIM. PETITIONER CONTENTS JURIST OF REASON
WOULD DISAGREE WITH THE LOWER COURT'S ANALYSIS
OF PETITIONER'S CLAIM. PETITIONER REQUEST
FOR AN EXTENSION OF TIME TO INCLUDE ON OR
ABOUT THE 30TH DAY OF APRIL, 2019.

WHEREFORE, PREMISES AND ARGUMENTS
CONSIDERED, PETITIONER PRAYS FOR A 40 DAY
EXTENSION OF TIME TO ADVANCE HIS
WRIT OF HABEAS CORPUS, IN GOOD FAITH AND
IN LIGHT OF THE ABOVE ARGUMENTS TO BE
SO PRAYED FOR.

Respectfully Submitted,

Kevin Terrell Gatum
KEVIN TERRELL GATUM
PETITIONER, Pro Se
TRCT # 1409740

AFFIDAVIT

PURSUANT TO CHAPTER 132, V.T.C.A., CIVIL
PRACTICE AND REMEDIES CODE AND
28 U.S.C. § 1746:

I, KEVIN TERRELL TATUM, PETITIONER, PRO SE,
BEING CURRENTLY CONFINED IN THE TDCJ-IP,
DARRINGTON UNIT, LOCATED IN BRAZORIA COUNTY,
TEXAS, HAVE READ THE FOREGOING "MOTION FOR
EXTENSION OF TIME" AND HEREBY DEPOSE AND
DECLARE UNDER THE PAIN AND PENALTIES OF
PERJURY THE FOREGOING "MOTION" IS TRUE AND
CORRECT TO THE BEST OF PETITIONER'S BELIEF
AND KNOWLEDGE.

EXECUTED ON THIS THE 18 DAY OF March, 2019.

Kevin Terrell Tatum

KEVIN TERRELL TATUM #1469740
Petitioner, Pro Se.

CERTIFICATE OF SERVICE

PETITIONER, KEVIN TERRELL TATUM, FILES
THIS HIS "MOTION FOR EXTENSION OF TIME", IN
GOOD FAITH, HEREBY CERTIFY A TRUE AND
CORRECT LEGIBLE COPY WAS SERVED UPON
THE UNITED STATES SUPREME COURT, LOCATED
IN WASHINGTON, D.C., ON THIS THE 18 DAY
OF March, 2019.

Kevin Terrell Tatum

KEVIN TERRELL TATUM
TDCJ #1469740