

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

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

**OCTOBER TERM 2018**

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JOHN LOVEMAN REESE,

Petitioner,

v.

STATE OF FLORIDA,

Respondent.

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*On Petition for a Writ of Certiorari to the  
Supreme Court of Florida*

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**APPLICATION FOR EXTENSION OF TIME  
TO FILE PETITION FOR WRIT OF CERTIORARI**

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***THIS IS A CAPITAL CASE***

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To the Honorable Clarence Thomas, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Eleventh Circuit:

Petitioner John Loveman Reese, a death-sentenced Florida prisoner, respectfully moves for a 60-day extension of time for undersigned counsel to file a petition for a writ of certiorari seeking review of the Florida Supreme Court's January 4, 2019 decision in his case. The Florida Supreme Court's January 4 decision is attached to this application. This application is being filed more than 10 days ahead

of the current certiorari filing deadline, which is April 4, 2019. *See* Rule 13.5. This Court has jurisdiction to grant a writ of certiorari under 28 U.S.C. § 1257(a).

Counsel request this extension based on unexpected developments in other clients' capital cases, including an April 5 discovery deadline for an intellectual disability evidentiary hearing imposed on March 19, that will curtail the time needed to fully research and prepare Mr. Reese's certiorari petition by the original deadline. In addition, co-counsel, the Capital Habeas Unit ("CHU") of the Federal Public Defender for the Northern District of Florida, has undergone unexpected staffing changes since the Florida Supreme Court's January 4 decision, including the departure of the lead attorney formerly responsible for Mr. Reese's case in the federal courts. A 60-day extension will allow sufficient time for counsel to meaningfully research, coordinate, and present Mr. Reese's certiorari arguments.

The Florida Attorney General's Office informed undersigned counsel that the State does not object to a 60-day extension.

Petitioner respectfully requests that the Court grant this request.

Respectfully submitted,

/s/ SEAN T. GUNN  
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