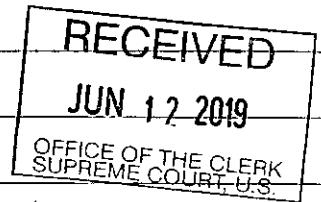


IN THE UNITED STATES SUPREME COURT

In the Interest of R.W., Jr., et al
Children.



Therian Wimbush
v.

Application No.
18A1240

State of Georgia,
Christopher M. Carr, et al.

Related case: 18A1106

Motion for Additional 30 Days Extension
of Time to File Petition for Writ
of Certiorari.

NOW COMES, Therian Wimbush, pro se, indigent prisoner, plaintiff/petitioner in the above referenced application and hereby moves this Honorable Court to grant her an additional 30 days extension to file the Petition for Writ of Certiorari in to the Supreme Court of Georgia's denial of her petition for Writ of Certiorari rendered on February 18, 2019. In support of this Motion petitioner/plaintiff states the following facts:

1. On June ~~6~~⁵, 2019, petitioner/plaintiff received correspondence from this Court indicating that she had been granted a 30 day extension of

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time to file her Petition for Writ of Certiorari in this Honorable Court, until and including June 18, 2019, just 13 days after receipt of the correspondence.

2. Plaintiff / Petitioner still has NOT been provided access to her legal materials by staff here at Pulaski State Prison, although she has been released from LOCKDOWN UNIT.

3. Plaintiff / Petitioner has now been without her own legal materials since April 11, 2019 and has made repeated attempts to contact staff in order to obtain access.

4. Plaintiff / Petitioner asserts that the issue being raised, "Should the mail box rule apply to ALL notices of appeal filed by pro se prisoners?" as petitioner / plaintiff was denied access to the appellate court forum here in Georgia, where appellate courts both apply the mailbox rule, because the Clerk of Gwinnett County Juvenile Court filed her Notice of Appeal One (1) day after the ten (10) day deadline from the Court of Appeals of Georgia's granting of an Application for Discretionary appeal.

5. Plaintiff/Petitioner was only able to provide this Honorable Court with copies of items filed in the Supreme Court of Georgia because she was sent them by her pro se, indigent, prisoner husband who ~~with~~ was also a party to the appeals in the Georgia appellate courts.
6. Plaintiff/Petitioner shows that she will be effectively denied access to this Court forum if she is not granted the additional 30 days time to file her petition

WHEREFORE, based on the premises, plaintiff/petitioner respectfully requests that this Honorable Court:

- (A) Grant her an extension of an additional 30 days to file her Petition for Writ of Certiorari.
- (B) Issue an order directing the staff of the Pulaski State Prison to GRANT plaintiff/petitioner ~~access~~ adequate, meaningful, and effective access to her legal materials, even to the courts, or
- (C) alternatively, consider the exhibits, including the Petition for Writ of Certiorari to the Court of Appeals of Georgia as the Petition for this Court and
- (D) Issue an order directing the Clerk of this Court to provide plaintiff/petitioner with a copy of the exhibits attached to the initial application.

This 5th day of June, 2019.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Motion for Additional 30 days Extension of Time to File Petition for writ of Certiorari, on the opposing party by depositing a copy of the same in the indigent postage mail for adequate postage to be affixed thereon, addressed to their counsel as follows:

Christopher M. Carr, Attorney General
Georgia Department of Law
40 Capital Square, SW
Atlanta, GA 30334

This 5th day of June, 2019.



Plaintiff/Petitioner Prose

THERIAN WIMBUSH

#1001955340

PULASKI STATE PRISON

P.O. Box 839

ATLANTA, GA 31036

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