

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

IN THE SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 2019

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TAURUS CARROLL, Petitioner,

v.

STATE OF ALABAMA, Respondent.

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APPLICATION FOR EXTENSION OF TIME TO  
FILE PETITION FOR WRIT OF CERTIORARI  
TO THE SUPREME COURT OF ALABAMA

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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:

Pursuant to Supreme Court Rules 13 and 30, Petitioner Taurus Carroll respectfully requests a 35-day extension of time to file his petition for certiorari in this Court:

1. The jurisdiction of this Court is invoked under 28 U.S.C. § 1257(a).
2. The Supreme Court of Alabama affirmed Mr. Carroll's sentence on April 5, 2019. Ex parte Carroll, No. 1170575, 2019 WL 1499322 (Ala. Apr. 5, 2019) (Attached as Exhibit A). On September 20, 2019, the Supreme Court of Alabama denied Mr. Carroll's application for rehearing. (Attached as Exhibit B.) Petitioner's time to file a certiorari petition in this Court expires on December 19, 2019. This application is being filed more than ten days before that date.

3. Petitioner is an inmate under a sentence of death, and his case raises serious constitutional issues that require careful presentation in his petition for certiorari.

4. Undersigned counsel has taken on Mr. Carroll's appeal in this Court pro bono but needs additional time to prepare the petition. Counsel currently is involved in many other criminal and civil cases, several of which have imminent filing deadlines and require counsel's immediate attention.

5. For these reasons, Mr. Carroll respectfully requests that an order be entered extending his time to petition for certiorari by 35 days, to and including January 23, 2020.

Respectfully submitted,

/s/ Benjamin W. Maxymuk  
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Dated: December 6, 2019

Counsel of Record for Mr. Carroll