

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

IN THE SUPREME COURT OF THE UNITED STATES

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**JOHN HENRY RAMIREZ,**  
*Petitioner,*

-v-

**LORI DAVID, DIRECTOR, TDCJ,**  
*Respondent.*

On petition for writ of certiorari to the  
United States Court of Appeals for the First Circuit

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OPPOSED MOTION FOR EXTENSION OF DEADLINE TO FILE PETITION FOR  
WRIT OF CERTIORARI

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ATTORNEY FOR PETITIONER

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-v-

**LORI DAVID, DIRECTOR, TDCJ,**  
*Respondent.*

On petition for writ of certiorari to the  
United States Court of Appeals for the Fifth Circuit

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## OPPOSED MOTION FOR EXTENSION OF DEADLINE TO FILE PETITION FOR A WRIT OF CERTIORARI

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To the Justices of the Supreme Court of the United States:

JOHN HENRY RAMIREZ, a prisoner on Texas' death row, respectfully files this opposed motion to extend the deadline for his petition for a writ of certiorari to **October 24, 2019**. As cause, Mr. Ramirez submits the following:

- 1) The Circuit Court's opinion issued June 26, 2019, *Ramirez v Davis*, 2019 U.S. App. LEXIS 19109 (5th Cir. 2019).
- 2) Counsel for Petitioner, Eric Allen, has had the following trials slated for September 2019:

- A. *State of Ohio v Donvan Clinchscales*: a client charged with rape and gross sexual imposition. It was determined the defendant required a competency evaluation by counsel.
- B. *State of Ohio v Darryl Ginyard*: a client charged with kidnapping and robbery. This trial required a continuance because additional investigation was needed.

3) Counsel for Petitioner, Eric Allen, also has the following deadlines in September 2019:

- A. *State of Ohio v Robert Bowen*: the court required a merit brief on September 10, 2019. The case involved a rape and sexual battery.
- B. *State of Ohio v David Chambers*: counsel must file a motion for new trial no later than September 23, 2019. This case involves important forensic sciences, namely shaken baby syndrome.

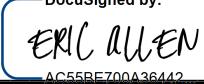
4) Counsel for the Petitioner, Seth Kretzer, has had the following commitments:

- A. Preparing an en banc argument due September 25, 2019.

4) The request is made so that Mr. Ramirez's petition for a writ of certiorari receives counsel's undivided attention. It is important to note that Ramirez was nearly executed in 2017.

5) No further request for extension will be made.

Respectfully submitted this 13th day of June  
2019:

DocuSigned by:  
  
9/13/2019  
/S/ AC55BE200A36442

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ATTORNEY FOR PETITIONER

**CERTIFICATE OF CONFERENCE**

I hereby certify that on September 5, 2019, I conferred with Assistant Attorney General of Texas, Jennifer Morris; she is **OPPOSED** to this request.



Seth Kretzer

**CERTIFICATE OF MAILING**

I hereby certify that, on the 13th day of September 2019, this pleading was deposited with the U.S. Postal Service, in an envelope or package correctly



addressed, with sufficient postage to assure delivery by certified first-class mail,  
R.R.R.

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Seth Kretzer