

IN THE
SUPREME COURT OF THE UNITED STATES

JOSE A. ADAMES-PETITIONER

vs.

BRIAN FOSTER-RESPONDENT

MOTION FOR EXTENSION OF
TIME TO FILE BRIEF

Petitioner Mr. Adames, moves this Court for an extension of time in which to file its brief in this case according to the Supreme Court of the United States Rule 30. Petitioner requests an extension of 60 days to December 16, 2019 or from the day this motion is presented to Justice Kavanaugh for a decision. This is petitioner's second motion for an extension of time in this case. The grounds for this motion are as follows:

1. On September 22, 2019, the Supreme Court of the United States granted petitioner Mr. Adames' motion and extended the time for filing his Petition For Writ Of Certiorari to October 17, 2019.
2. Petitioner will be unable to complete his brief by the current deadline because of the continuation of construction that is being conducted inside the cell halls of the institution.
3. Because of this construction, our passes to assist the legal law library are being cancelled.
4. Petitioner will be unable to complete his brief by the current deadline because the DOC has changed and is existing data diskettes (e.g. "floppy disks") to a USB drive and all of petitioner's saved legal documents and motions, including petitioner's Petition For Writ Of Certiorari, has been destroyed on September 17, 2019. Due to this change of a USB drive by the DOC, inmates must purchase the USB drive for \$4.50. Which means that the inmate must have that amount (\$4.50) in his regular account to purchase the USB drive. Petitioner does not have that amount of money in his regular account to purchase the USB drive due to that petitioner does not have any family support to deposit gift money into petitioner's regular account and due to that petitioner just started a institution job in the food services area on October 3, 2019. Petitioner only can get pay every two weeks from/by his recently acquired job.
5. The time requested also reflects the time necessary for petitioner to complete the substance of the brief, and for petitioner to prepare the brief by cite-checking, record-checking, reviewing and copying said brief.

6. The time requested will also reflect the time necessary for petitioner to complete the substance of the brief and for petitioner to have saved up sufficient money from his institution state job in his regular prison account for the purchase of the new DOC USB drive, reviewing and to pay for any copy, preparation and completion of petitioner's brief.

For these reasons, petitioner Mr. Adames respectfully submits that a 60 day extension is reasonably necessary. Therefore, the petitioner asks that its filing deadline be extended 60 days from October 17, 2019. Petitioner shall make every possible effort to file his brief prior to this date.

Dated this 5 day of October, 2019.

Respectfully submitted by



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