

**SUPREME COURT  
OF THE UNITED STATES OF AMERICA**

**MARIAN MORGAN**

**FILED**  
**NOV 15 2019**  
**OFFICE OF THE CLERK**  
**SUPREME COURT, U.S.**

**Petitioner,**

Case No.:

*19A560*

v.

**UNITED STATES OF AMERICA**

**Respondent.**

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**PETITIONER'S MOTION FOR 60-DAY EXTENSION OF TIME TO  
FILE PETITION FOR CERTIORARI**

Petitioner Marian Morgan, by and through undersigned counsel, moves pursuant to Supreme Court Rule 13.5 for a 60-day extension of time to file a petition for certiorari from the Eleventh Circuit Court of Appeals' opinion dated August 21, 2019 (attached as Exhibit 1) in Case No. 16-15460 denying her petition for post-conviction relief under 28 U.S.C. 2255:

1. The basis for the Court's jurisdiction is the Eleventh Circuit's decision on an important federal question in conflict with this Court's decision in *Strickland v. Washington*, 466 U.S. 668 (1984).
2. The judgment sought to be reviewed is attached as Exhibit 1. Defendant Morgan, who is now 65 years old, has a release date of January 31, 2039, according to the Bureau of Prisons' inmate locator attached as Exhibit 2.
3. The requested extension of time is justified because Ms. Morgan only informed undersigned counsel late November 8, 2019 that she wants this motion

filed and intends to hire undersigned counsel to prepare the petition for certiorari. There is no way undersigned counsel can effectively prepare a petition for certiorari by November 19, 2019, in part because undersigned counsel has a receivership hearing on the day before, November 18, which has been set for months.

4. This motion is not made for purposes of delay because Ms. Morgan is in custody serving her lengthy sentence. For this same reason, the Government would not be harmed by the requested 60-day extension.

Wherefore, Petitioner Marian Morgan respectfully requests that her time to file a petition for certiorari be extended by 60 days to January 18, 2020.

Respectfully submitted,

/s/ Kevin J. Darken

**Kevin J. Darken**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by U.S. Mail on November 13, 2019 to:

Todd Grandy  
Assistant United States Attorney  
United States Attorney's Office, Suite 3200  
400 North Tampa Street  
Tampa, FL 33602

*/s/ Kevin J. Darken*  
**Kevin J. Darken**