

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

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**IN THE SUPREME COURT OF THE UNITED STATES**

October Term, 2018

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RAPHAEL PERSON, *Petitioner*

*v.*

STATE OF OHIO, *Respondent*

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On Petition for a Writ of Certiorari to the  
United States Court of Appeals for the Sixth Circuit

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**APPLICATION FOR EXTENSION OF TIME TO FILE PETITION  
FOR WRIT OF CERTIORARI**

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(*Counsel of Record*)

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Counsel for Petitioner Raphael Person

To the Honorable Elena Kagan, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Sixth Circuit:

1. Petitioner Raphael Person, through counsel, and respectfully requests that this Honorable Court extend by thirty days, from July 22, 2019 until Wednesday, August 21, 2019, the time by which a petition for writ of certiorari to the Franklin County Court of Appeals, Tenth Ohio Appellate District.

The due date for the filing of a petition is July 22, 2019, the ninetieth day since April 23, 2019, when the United States Court of Appeals for the Sixth Circuit.

2. The counsel assigned to this case by the Ohio Public Defender's Office is engaged in the litigation of a number of other matters that has resulted in counsel's needing additional time to effectively pursue the certiorari petition in this case.

3. Mr. Person now wishes to ask this Court to hear an appeal from a decision in which the United States Court of Appeals for the Sixth Circuit, which held that when a District Court gives two combined reasons for imposing prison terms consecutively, it is essentially irrelevant that one of the reasons is incorrect.

WHEREFORE, Petitioner respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for thirty days, up to and including Wednesday, August 21, 2019.

Respectfully submitted,

OFFICE OF THE OHIO PUBLIC DEFENDER

/s/ Stephen P. Hardwick

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