

Docket Number: \_\_\_\_\_

IN THE SUPREME COURT OF THE UNITED STATES

OCTOBER TERM 2021

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**MICHAEL SHANE BARGO,**

Petitioner,

vs.

**STATE OF FLORIDA,**

Respondent.

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*On Petition for a Writ of Certiorari  
from the Supreme Court of Florida*

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

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**CAPITAL CASE**

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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:

Petitioner Michael Shane Bargo, a death sentenced Florida prisoner with no execution date set, respectfully moves for a 60-day extension of time for filing a petition for writ of certiorari seeking review of the Florida Supreme Court's recent decision in his case. On June 24, 2021 the Florida Supreme Court denied Mr. Bargo's direct appeal from his death sentence. (Attachment A). Mr. Bargo filed a timely motion for rehearing which was denied on January 26, 2022, thus starting the time

time for seeking certiorari in this Court. (Attachment B). Without an extension, the date the petition for a writ of certiorari is due is April 26, 2022.

This Court has jurisdiction to grant a writ of certiorari under 28 U.S.C. §1257(a).

The undersigned is replacing prior appointed counsel for the purposes of the petition for writ of certiorari; in addition, the undersigned did not represent Mr. Bargo at trial or on his direct appeal. Undersigned counsel is representing Mr. Bargo on a *pro bono* basis, and there are many complex issues involved that will need to be reviewed. The record in this matter is voluminous and additional time is required to review the record and synthesize the issues to be presented to this Court.

Petitioner accordingly requests that the due date for the filing of a petition for certiorari be extended to June 27, 2022.

Respectfully submitted,



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March 23, 2022

Dated