

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 2021

EDWARD THOMAS JAMES, APPLICANT/PETITIONER

v.

STATE OF FLORIDA, RESPONDENT

**UNOPPOSED APPLICATION FOR AN EXTENSION OF TIME TO FILE A
PETITION FOR A WRIT OF CERTIORARI TO THE SUPREME COURT OF
THE STATE OF FLORIDA**

DEATH PENALTY CASE

DIRECTED TO THE HONORABLE CLARENCE THOMAS, ASSOCIATE
JUSTICE OF THE SUPREME COURT OF THE UNITED STATES AND CIRCUIT
JUSTICE FOR THE ELEVENTH CIRCUIT

ROBERT S. FRIEDMAN
KARIN L. MOORE
Counsel of Record
Office of the Capital Collateral
Regional Counsel – Northern Region
1004 DeSoto Park Drive
Tallahassee, Florida 32301
(850) 487-0922
Robert.Friedman@ccrc-north.org
Karin.Moore@ccrc-north.org

Attorneys for Applicant/Petitioner

October 14, 2021

UNOPPOSED APPLICATION FOR AN EXTENSION OF TIME

Petitioner Edward Thomas James respectfully requests, pursuant to Rule 13.5 of the Rules of this Court, an extension of time of 60 days, to and including January 22, 2022 for the filing of a petition for a writ of certiorari.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is the Florida Supreme Court decision on July 8, 2021 denying relief to Petitioner (Exhibit 1) and the order denying his motion for rehearing on August 30, 2021 (Exhibit 2).

JURISDICTION

This Court has jurisdiction to grant a writ of certiorari under 28 U.S.C. § 1257(a). Under Rules 13.1, 13.3, and 30.1 of the Rules of this Court, a petition for a writ of certiorari would be due to be filed on or before November 28, 2021. In accordance with Rule 13.5, this application is being filed more than 10 days in advance of filing date for the petition for a writ of certiorari.

REASONS JUSTIFYING AN EXTENSION OF TIME

The Office of the Capital Collateral Regional Counsel–Northern Region (“CCRC-N”) was appointed by the trial court to represent Petitioner and will file the certiorari petition. This request for an extension of time is based upon good cause, as follows:

Undersigned counsel has an initial state court postconviction motion due on October 19, 2021 in *State v. Rodney Newberry* (Duval County case 2012-CF-9296), an initial brief due in the Florida Supreme Court on November 19, 2021 in *State v. David*

Russ, SC 21-1205, a petition due in this Court in capital case *State of Florida v. Edward T. James* (SC20-1036) on November 29, 2021, and other state court filing deadlines in other capital cases in the next few months.

A 60-day extension of time is reasonable in Petitioner's case to allow CCRC-N to research, coordinate, and present the instant petition in a professional manner.

Furthermore, undersigned counsel is authorized to represent that she has conferred with Assistant Attorney General Patrick A. Bobek and he has no objection to this request for a 60-day extension of time.

CONCLUSION

For the foregoing reasons, petitioner hereby requests that an extension of time to and including January 22, 2021, be granted within which petitioner may file a petition for a writ of certiorari.

Respectfully submitted,



ROBERT S. FRIEDMAN
KARIN L. MOORE
Counsel of Record
Office of the Capital Collateral
Regional Counsel – Northern Region
1004 DeSoto Park Drive
Tallahassee, Florida 32301
(850) 487-0922
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