

No. _____

In The Supreme Court of the
United States

Adam Eugene Martin - Petitioner

vs.

United States of America - Respondent

Motion To File Late Certiorari Out of Time

Comes now, Adam Eugene Martin, Petitioner pro-se, who would now move this Court for permission to file an Out of Time Certiorari, for the following reasons to wit;

1). Petitioner did not learn until April 22, 2022 that his 3600A appointed counsel Stephanie K. Bond had not timely filed his Writ of Certiorari. (hereto attached document's show this is true).

2). Petitioner's 18 USC 3600A appointed counsel was clearly ineffective assistance of counsel in her failure to follow clearly established rules of this Court, specifically Rule 29 as to the filing of document's, and a violation of Rule 36 (1) because Petitioner

is a 28 USC 2241 habeas corpus prisoner who was improperly transferred from USP-Tucson in Arizona to USP-Allenwood in White Deer, PA. even after Petitioner informed Ms. Bond in writing that the prison was attempting to move him.

3). Petitioner's Writ of Certiorari encompasses a direct violation of due process of law, and a direct violation of the substantive law of the State of Texas by the Ninth Circuit's "interpretation" of making an indivisible State statute devisible, contrary to the substantive law established by the State of Texas and its legislators.

Relief

Petitioner has attached a copy of his hand-written Writ of Certiorari with Appendix A, and request that this Court allow the filing of this Out of Time Certiorari, due to ineffective assistance of counsel.

Submitted this 16 day of MAY, 2022.

x 

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