

May 1, 2022

Scott S. Harris, Clerk

Supreme Court of the United States

1111 St. NE

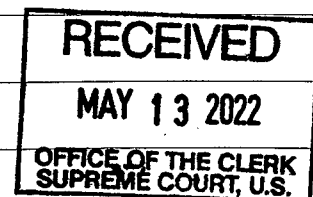
Washington, DC 20543-0001

Re: Extension of Time to file Writ of Certiorari from
the denial of U.S. Court of Appeal Fifth Circuit
No. 21-40433

Dear Mr. Harris,

Please find enclosed the original and a carbon
copy of my Application for An Extension of Time For
Filing His Writ of Certiorari, for presenting to the
Court.

I thank you so very much, in advance, for your kind
and generous assistance in this matter.



Sincerely,

Brandon Cooper

Brandon Cooper, pro se



In The
Supreme Court Of The United States

No. _____

Brandon L. Cooper - petitioner

v.

Bobby Lumpkin, Director - respondent

Application for An Extension of Time
For Filing His Petition for a Writ
Of Certiorari from The
United State Court of Appeals for The
Fifth Circuit
No. 21-40433

To The Honorable Justices Of the Court:

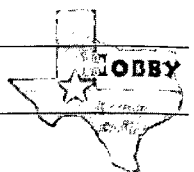
Into Court comes Brandon L. Cooper ("Cooper"),
Petitioner prose in this case and respectfully, moves
this Court to grant him an extension of time in which
to file his Petition for Writ of Certiorari from the
decision of the United States Court of Appeals for
the Fifth Circuit entered on February 22, 2022
in No. 21-40433, denying a C O A. In support of

this motion, Cooper offers the following:

1). The judgment of the Fifth Circuit court of appeals was rendered in this action on February 22, 2021, and under Rule of the Supreme Court rules of the United States Cooper has ten (10) days before the specified final filing date which to file an extension of time to file his Writ of certiorari, making his petition/writ due on or before Sunday, May 22, 2022 and the extension of time due on or before Friday, May 13, 2022.

2). Cooper seeks an extension of ninety (90) days to file his Writ of certiorari.

3). Cooper is proceeding in this appeal pro se, because he cannot locate any attorney who would be willing to represent him on a pro bono basis. Also, he has proceeded as an indigent petitioner in the courts below. Cooper is left with no other option but to prepare his own writ of certiorari and litigate the remainder of his petition himself. Cooper prays that this Honorable Court will take notice that he is a layperson who is not trained in the law. The issues and legal theories that are involved in this case are somewhat complicated and complex. The facts and laws at issue, which Cooper plans to present in his



writ, are so intertwined with complicated points of statutory and constitutional law that Cooper is placed at a distinct disadvantage. The period of time normally allowed under the appellate rules for researching, preparing and filing a meaningful writ of certiorari is, in all probability, ample for an experienced and articulate lawyer, one who is well-versed and knowledgeable in drafting pleadings and papers.

Even though this Court will undoubtedly follow *Haines v. Kerner*, 404 U.S. 519 (1972); *Conley v. Gibson*, 355 U.S. 41 (1957); and *Price v. Johnson*, 334 U.S. 266 (1948), and will construe a pro se petitioner's filings liberally, that a pro se litigant is placed in a distinct and unfair disadvantage where he must argue complicated points of law as well as those of fact, and do so in a manner that complies with the courts' procedural rules. If this Court applies a rationale that is consistent with the foregoing cited cases, it would be unreasonable to readily expect that Cooper, an inexperienced pro se petitioner, is able to readily and competently prepare a meaningful and viable petition in the same period of time that is normally allotted to experienced attorneys. In order for Cooper to do so, it will require extensive and in-depth research which will require the extension of time requested, where Cooper's use of the prison's law library is limited and restricted, and other

circumstances may arise that will be beyond Cooper's control; such as, a full unit lockdown, or a rotating lockdown of sections of the facility.

To reiterate the critical point -- Cooper will need additional time so that he will be able to adequately research and prepare a viable and meaningful writ of certiorari in this appeal.

4). Cooper has not previously requested any extensions of time in this Court, in regard to the writ of certiorari. Cooper apologizes to this Court for the necessity of this extension, and he certifies that he does not request it for the purposes of delay, or for harassing the Respondent, and he believes that any extension will not prejudice the Respondent.

PRAYER

Wherefore, Premises Considered, Cooper respectfully prays that the Honorable Court will grant him an extension of ninety (90) days for submitting his writ of certiorari to this Court.

Respectfully submitted,
Paul L. Cooper #1797873
Luther Unit, 1800 Luther Dr.
Navasota, TX 77868