

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

Shannon V. Campbell – PETITIONER

VS.

Anthony J. Annucci, Commissioner, DOCCS
Mr. Ranier, Tier III Hearing Officer
D. Venetozzi, Director of Special Housing,
In their Individual and Official Capacity – RESPONDENT(S)

A MOTION FOR AN EXTENSION OF TIME TO FILE A WRIT OF CERTIORARI

State of New York)

County of Clinton)ss.:

I, Shannon V. Campbell, first being duly sworn, deposes and says:

1. I am the Petitioner in the above captioned matter, proceeding pro se.
2. I make this Affidavit in support of an application for an extension of time to file a Writ of Certiorari.
3. It should be noted that even though the Order that the IFP motion is denied dated March 02, 2022, I did not receive it until on or about March 07, 2022. However, there have been several developments that prevent me from submitting a Writ of Certiorari within the 90 days.

4. First, there has been a recent closing of block(s) in Clinton Facility resulting in inter-facility moves. Causing the locking locations to change on a day-to-day bases and callouts and mail to be pushed back too two to three days late.

5. Second, access to the law library has been nearly impossible. Normally, when a person is medically keep locked, an inmate law clerk can come see him to assist him with his legal requests. However, because we have been moved due to our program, and I am not keep lock, no inmate law clerk can come to my cell. We have to wait on the mail system, which takes at least 3 days from the moment of request, to delivery of the requested item(s).

6. Thirdly, access to the law library has been limited to only (12) twelve inmates a session (normally 24 inmates can be giving access to the law library a session) due to the COVID-19 callout format. It is on a first come first giving callout bases. The facility houses at least 2050 inmates in general population. Bounds v. Smith, 430 U.S. 817 (1977) (Not in accordance with the holdings in Bounds v. Smith)

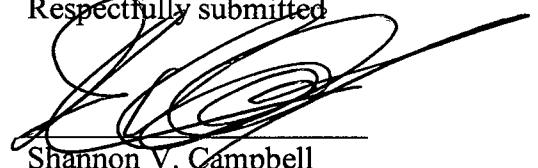
7. Based on these facts, I am requesting until August 03, 2022, to file a Writ of Certiorari. This time is needed because it seems that Clinton Correctional Facility is currently still running access to the law library on a COVID-19 bases, and it is not unreasonable to assume that there will be limited access to the law library at Clinton Correctional Facility in the near future.

WHEREFORE, Petitioner respectfully request that an Order be given granting an Extension of Time to file a Writ of Certiorari of 60 days and that this Court grant such further relief as it deems just and proper.

Statement Pursuant to 28 U.S.C. 1746 I declare under the Penalty of Perjury that the Foregoing is true and correct.

Signed this 21 day of May, 2022

Respectfully submitted



Shannon V. Campbell
Petitioner, Pro se