

No. \_\_\_\_\_

**IN THE SUPREME COURT OF THE UNITED STATES**

Jack Sliney,  
*Petitioner,*

v.

State of Florida,  
*Respondent.*

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**PETITIONER'S APPLICATION FOR EXTENSION OF TIME TO FILE  
PETITION FOR A WRIT OF CERTIORARI**

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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, Jack Sliney, respectfully applies to this Court for an order extending the time in which to file his petition for writ of certiorari from Wednesday, August 23, 2023 up to and including Monday, October 23, 2023, a period of sixty (60) days. This Court has jurisdiction under 28 U.S.C. §1257(a). In support of this Application, Mr. Sliney states as follows:

1. Mr. Sliney is incarcerated after a conviction of murder for which he was sentenced to death. On May 25, 2023, the Florida Supreme Court rendered an opinion in Case No. SC2022-0700 (attached as Exhibit A), where in the

Court denied Mr. Sliney's Successive Motion for Post Conviction Relief based upon newly discovered evidence. A motion for rehearing was not filed.

2. Mr. Sliney's issue implicate the Eight Amendment to the United States Constitution.
3. According to Supreme Court Rule 13.3, the petition for writ of certiorari is due on or before August 23, 2023. See Supreme Court Rule 13.3 ("the time to file the petition for a writ of certiorari runs from the date of entry of the judgment or order sought to be reviewed.") However, the time granted by Supreme Court Rule 13.3 will not give counsel adequate time to address the issues at hand. Therefore, Petitioner requests an extension of sixty (60) days in which to file the petition for a writ of certiorari. See Supreme Court Rule 13.5 ("[A] Justice may extend the time for filing a petition for writ of certiorari for a period not exceeding 60 days").
4. In accordance with Supreme Court Rule 13.5, this Application is submitted at least ten (10) days prior to the present due date. Further the request for an extension is made in good faith and not for purposes of delay.
5. Counsel's caseload will impede her ability to devote adequate time and attention to the preparation of the petition for writ of certiorari on Petitioner's behalf, as counsel is busy with her other cases in the interim. Therefore, in light of counsel's current obligations and the importance of the constitutional issues that will be presented in this capital case, counsel

submits that a sixty (60) day extension is necessary and appropriate in order to effectively prepare the petition for certiorari on Mr. Sliney's behalf.

Wherefore, in the interest of justice and for good cause shown, counsel for Mr. Sliney respectfully requests that this Court grant an extension of time of sixty (60) days, to and including October 23, 2023 within which to file the Petition for Writ of Certiorari in the above styled case.

Respectfully submitted,

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