

No. 22A-\_\_\_\_

---

---

In the  
**Supreme Court of the United States**

---

SLADE ALAN MOORE,  
*Petitioner,*

v.

STATE OF TEXAS,  
*Respondent.*

---

On Petition for Writ of Certiorari to the  
Eighth Court of Appeals of Texas

---

**APPLICATION FOR EXTENSION OF TIME TO FILE  
A PETITION FOR WRIT OF CERTIORARI  
TO THE EIGHTH COURT OF APPEALS OF TEXAS**

---

---

---

Lane A. Haygood  
3800 E. 42nd St. Suite 110  
Odessa, Texas 79762  
Tel: 432.803.5800  
lhaygood@galyen.com

Mark W. Bennett  
917 Franklin Street  
Fourth Floor  
Houston, Texas 77002  
(713) 224-1747  
mb@ivi3.com

---

---

**APPLICATION FOR EXTENSION OF TIME TO FILE  
A PETITION FOR WRIT OF CERTIORARI  
TO THE EIGHTH COURT OF APPEALS OF TEXAS**

To the Honorable Samuel Alito, Associate Justice of the United States Supreme Court and Circuit Justice for the Fifth Circuit.

Pursuant to 28 U.S.C. § 2101(c) and Rules 13.5, 22, and 30.3 of the Rules of this Court, applicant Slade Alan Moore requests an extension of sixteen (16) days, to and including October 6, 2022, within which to file a petition for writ of certiorari in this case. His petition will challenge the decision of the Eighth Judicial District Court of Appeals of Texas in *Ex Parte Moore*, Nos. 08-20-00064-CR, 08-20-00065-CR, and 08-20-0065-CR. In support of this application, Petitioner states:

1. The Eighth Court of Appeals rendered its opinions on February 4, 2022. Copies of the opinions in each case are attached collectively as Appendix A. The Court of Criminal Appeals of Texas refused discretionary review on June 22, 2022, and no petition for rehearing was filed. The court's notice refusing discretionary review is attached to this application as Appendix B. Without an extension, the petition for writ of certiorari would be due on September 20, 2022. This application is filed more than ten days before that date.

2. This Court's jurisdiction would be based on 28 U.S.C. § 1257(a).

3. If this application is granted, Petitioner intends to file petition for writ of certiorari jointly with *Barton v. Texas* No. 22A138 (S. Ct. Aug. 8, 2022) and *Sanders v. Texas* No. 22A207 (S. Ct. Aug. 30, 2022), as the issues in the cases are essential identical, and the writs of certiorari would both be to the Court of Criminal Appeals of Texas. *See* Sup. Ct. R. 12.4. Messrs. Barton and Sanders are also represented by the same undersigned

counsel. The *Barton* petition is due on October 6, 2022. *See Barton v. Texas*, No. 22A138 (S. Ct. Aug. 18, 2022) (Alito, J.). Synchronizing the deadlines to allow a joint petition would serve the interests of judicial economy and conserve resources of counsel, who are representing both petitioners *pro bono*.

4. Counsel for Respondent has indicated that Respondent does not oppose this application via electronic mail on September 7, 2022.

5. For these reasons, Petitioner respectfully requests that the due date for his petition for a writ of certiorari be extended to October 6, 2022.

Respectfully submitted,

By: /s/ Lane A. Haygood

Lane A. Haygood  
3800 E. 42<sup>nd</sup> St. Ste. 110  
Odessa, Texas 79762  
(432) 803-5800  
lhaygood@galyen.com

Mark W. Bennett  
917 Franklin Street  
Fourth Floor  
Houston, Texas 77002  
(713) 224-1747  
mb@ivi3.com