

United States Supreme Court

Docket No. _____

Kyle Watkins, Petitioner)	
)	
v.)	Petitioner's Assented-to Motion for
)	Enlargement of Time to File
)	Petition for Writ of Certiorari
Sean Medeiros, Respondent)	

Now comes the Petitioner, Kyle Watkins, and requests that the Court enlarge the time his Petition for Writ of Certiorari until November 14, 2022. As grounds therefor, this Motion relies on the attached Affidavit of Counsel.

Counsel for the Respondent, Gabriel Thomas Thornton, has assented to this Motion.

Respectfully submitted

/s/ Janet Hetherwick Pumphrey
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October 13, 2022

Certificate of Service

I, Janet Hetherwick Pumphrey, certify that I have forwarded the above document to Gabriel Thomas Thornton at gabriel.thornton@state.ma.us today.

/s/ Janet Hetherwick Pumphrey

United States Supreme Court

Docket No. _____

Kyle Watkins, Petitioner)	
)	
v.)	Affidavit of Counsel
)	
Sean Medeiros, Respondent)	

I, Janet Hetherwick Pumphrey, hereby depose and state:

1. I have represented the Petitioner, Kyle Watkins, since 2008, throughout the entirety of the litigation of the appeal of his conviction for first degree murder.
2. Mr. Watkins has always been very much involved in the drafting of the pleadings in his case.
3. I have sent Mr. Watkins a first draft of his Petition for Writ of Certiorari, and I have had two Zoom meetings with him to discuss his proposed changes.
4. I learned that yesterday his unit at MCI Norfolk, the “lifers’ unit” has been quarantined because of a covid outbreak until at least October 21.
5. I have almost finished a second draft to mail back to Mr. Watkins, but he may not be able to receive mail during this time, and he definitely would not be able to meet in a Zoom meeting or have a telephone conversation.
6. If I can finish and file the Petition prior to the requested due date of November 14, I will do so.

Signed under pains and penalties of perjury,

/s/ Janet Hetherwick Pumphrey

October 13, 2022

