

No.

Colorado District Court Case: 96CR589
Colorado Court of Appeals Case: 19CA1284
Colorado Supreme Court Case: 22SC331

IN THE
SUPREME COURT OF THE UNITED STATES

1 First St., N.E., Washington D.C. 20543

CHRISTOPHER ASHLEY SHETSKIE — PETITIONER

VS.

THE PEOPLE OF THE STATE OF COLORADO — RESPONDENT(S)

ON PETITION FOR WRIT OF CERTIORARI TO
THE COLORADO COURT OF APPEALS

MOTION TO EXTEND THE DEADLINE FOR FILING A PETITION
FOR WRIT OF CERTIORARI REVIEW

Christopher A. Shetskie CDOC# 92178
pro se,

Sterling Correctional Facility
Box 6000
Sterling, CO 80751

I, Christopher A. Shetskie, pro se, respectfully move this Supreme Court of the United States, pursuant to Supreme Court Rule 13(5) to grant a 60 day extension for the filing of a Petition For Writ Of Certiorari Review.

JURISDICTION

On January 7, 2019 I filed a post-conviction motion, pursuant to Colorado Rules of Criminal Procedure 35(c) variously challenging the

constitutionality of my conviction for first degree murder under Colorado Revised Statute §18-3-102(1)(b)(Repealed). The motion was summarily denied on the merits by the district court on July 10 2019 (see App. B). On January 6, 2019 I filed an appeal of the lower courts decision in the Colorado Court of Appeals. On February 17, 2022 the court of appeals issued its order affirming in part, denying in part, and remanding with directions (see App. A). On October 4, 2022 the Colorado Supreme Court denied my Petition For Writ of Certiorari Review (see App. C).

U.S. Constitutional Amendment XIV and Supreme Court Rule 13(1) grants this Court jurisdiction to issue a writ of certiorari review if said petition is filed within 90 days of the Colorado Supreme Court's order denying discretionary review of the Colorado Court of Appeals' opinion. This Motion is within that 90 day deadline.

In compliance with Supreme Court Rule 39 I have attached to this Motion a properly completed Motion To Proceed In Forma Pauperis.

REASON FOR GRANTING AN EXTENSION

I am currently incarcerated in the Sterling Correctional Facility in Sterling Colorado. This facility, along with the entire Colorado DOC is experiencing an historic chronic staffing shortage. As a consequence, the facility Law Library is under-staffed. This circumstance has caused the following hardships,

Physical access to the Law Library was suspended indefinitely in June 2022. As a result I do not have access to computer resources, such as Lexis Nexus, word processing or legal books.

Any research or other legal services can only be accessed by written request submitted via interfacility mail. Any such research or assistance is conducted by third-party, is extremely limited in quantity & volume and takes weeks to complete a loan

cycle. This circumstance will persist for the foreseeable future.

Additionally, On October 6, 2022 the district court appointed counsel in compliance with the Colorado Court of Appeals Remand. On October 28, 2022 Mandrin A. Bowers, Reg. No. 29863, Law Office of Mandrin A. Bowers, PC 1775 Sherman St., Suite 1650 Denver, CO 80203 Ph. 720-353-7434; Fax: 866-839-9805; Email: mandrinbowers@msn.com entered her appearance in the above case. While not appointed to represent me on appeal, she nevertheless may do so, as issues related to those on remand are connected to the issues I will be asserting in my forthcoming Petition to this court. She will need time to familiarize her self with the case and conduct research into my claims. If after doing so, she may -at her professional discretion- enter her appearance in this matter. Or not. Either way, it will take time to determine her involvement.

Lastly, the issues I will be presenting to this Court are serious and complex. My appeal asserts several issues of first impression and novel lines of argument challenging the constitutionality of Colorado's now repealed so-called "felony murder" rule, CRS §18-3-102 (1)(b), as well as claims of ineffective assistance of trial counsel during plea negotiations and arbitrary & capricious actions by the Colorado Court of Appeals which have perverted and undermined decisions of this Supreme Court. Should this Court grant Certiorari it decision will have substantial consequences in the Law, not just in Colorado buy nationally. Consequently, I require extra time to draft an effective and succinct petition.

WHEREFORE, I respectfully Move this Supreme Court, in the interest of justice and due process of law, and in consideration of the exigent circumstances related above, grant me a 60 day extension to the 90 day deadline for filing my Petition For Writ For Certiorari Review.

Respectfully submitted this 26th day of November, 2022,



Christopher A. Shetskie, pro se

CERTIFICATE OF MAILING

I, Christopher Shetskie, pro se, certify that on November 26th, 2022 I placed into the facility Legal Mail Service a true and correct copy of the above Motion and Motion To Proceed In Forma Pauperis, postage prepaid and addressed to the following,

Office of the Colorado Attorney General
Attn: Brian Lanni, Dep. Asst. Att. Gen.
1300 Broadway, 10th Floor
Denver, CO 80203



Christopher A. Shetskie, pro se.