

OCTOBER TERM, 2022

CASE NO. _____
IN THE SUPREME COURT OF THE UNITED STATES

RAHMAEL SAL HOLT,
Petitioner,

v.

COMMONWEALTH OF PENNSYLVANIA,
Respondent.

APPLICATION FOR EXTENSION OF TIME
TO FILE PETITION FOR WRIT OF CERTIORARI TO THE
PENNSYLVANIA SUPREME COURT

PETITIONER, Rahmael Sal Holt, through undersigned counsel, respectfully moves for an extension of thirty (30) days to prepare and file his Petition for Writ of Certiorari to the Pennsylvania Supreme Court. In support of this unopposed request, Petitioner respectfully submits:

1. On April 28, 2022, the Pennsylvania Supreme Court affirmed Petitioner's conviction for first-degree murder and death sentence. *Commonwealth v. Holt*, 273 A.3d 514 (Pa. 2022). Petitioner, through undersigned counsel, wishes to file a Petition for Writ of Certiorari to seek this Court's review of the Pennsylvania Supreme Court's judgment. This Court has jurisdiction to review the Pennsylvania Supreme Court's decision pursuant to 28 U.S.C. § 1257. Petitioner's certiorari petition is currently due on July 27, 2022. *See* Sup. Ct. R. 13.1. In accordance with this Court's rules, this request is made at least ten (10) days in advance of the current due date. *See* Sup. Ct. R. 13.5.

2. Petitioner's case presents complex legal issues and involves nearly five years of proceedings. Substantial time is required to review the record and consider the procedural posture of the issues as may be relevant to a petition for certiorari. Moreover, Petitioner requests additional time to file in light of counsel's heavy workload. Counsel as recently filed and argued preliminary objections and responsive pleadings in two civil cases and filed an application for reargument in the Pennsylvania Supreme Court. Counsel also endured a Covid-19 quarantine. Furthermore, counsel currently has two trials scheduled for August 2 – each with multiple felony counts – a custody hearing scheduled for August 4, a Pennsylvania Superior Court brief due by August 8, and two Pennsylvania Supreme Court pleadings due by August 10.

3. Under these circumstances, the undersigned respectfully requests that the Court grant this Motion and extend the time in which to file the Petition for Writ of Certiorari by thirty days, until August 26, 2022.

4. The granting of this request shall cause no prejudice to the Commonwealth.

5. This request is made in good faith and is not predicated on an intent to delay the resolution of this litigation.

WHEREFORE, Petitioner prays that the Court allow a thirty-day extension for the preparation and filing of this Petition for Writ of Certiorari.

Respectfully submitted,

/s/ Christine M. Selden_____

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Counsel for Petitioner, Rahmael Holt

Dated: July 15, 2022