

DEC 06 2022

No. 22 A 526

FOR MAILING
RECEIVED BY *JM*
ORIGINAL

IN THE SUPREME COURT OF THE UNITED STATES

_____ term 2022

FILED
NOV 18 2022
OFFICE OF THE CLERK
SUPREME COURT, U.S.

JEFFREY TODD CRYSTAL
Petitioner

vs.

STATE OF FLORIDA
Respondent

**MOTION TO EXTEND TIME TO FILE A
PETITION FOR WRIT OF CERTIORARI**

Petitioner moves this Honorable Court for an extension of time to file a petition for Writ of Certiorari. As grounds the Petitioner submits the following to Justice Sotomayor:


1. On May 17, 2022 Petitioner submits to prison officials his Petition for Writ of Habeas Corpus alleging plain error and entitlement to immediate release from an illegal detention. On May 20, 2022 the petition was docketed by the Clerk for the First District Court of Appeal, State of Florida.

RECEIVED
DEC 14 2022
OFFICE OF THE CLERK
SUPREME COURT, U.S.

2. On August 10, 2022 the First District Court of Appeal, State of Florida dismissed the petition for Writ of Habeas Corpus – having original jurisdiction. “Per Curiam without opinion”.
3. Petitioner, timely filed a Motion for Rehearing on August 25, 2022. Rehearing was denied on September 30, 2022. See Appendix A.
4. A petition for Writ of Certiorari is timely filed within (90) ninety days of denial of rehearing and based upon Petitioner’s computation is December 29, 2022.
5. However, on October 10, 2022 Petitioner was transferred from Apalachee Correctional Institution to Jefferson Correctional Institution causing Petitioner to not receive the September 30, 2022 rehearing denial until October 21, 2022. Along with difficulty in access to Jefferson Correctional Institution law library Petitioner respectfully requests a (60) sixty day

extension to properly file petition for Writ of Certiorari on or
before Monday, February 27, 2023.

Respectfully submitted,

/s/ 

Jeffrey Todd Crystal
Jefferson Correctional Institution
1050 Big Joe Road
Monticello, FL 32344-5188

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

JEFFREY TODD CRYSTAL
Petitioner

vs.

STATE OF FLORIDA
Respondent

PROOF OF SERVICE

I, Jeffrey T. Crystal, do swear or declare that on this date, December 6, 2022 as required by the Supreme Court Rule 29 I have served the enclosed Motion to Extend Time to File a Petition for Writ of Certiorari on each party to the above proceeding or the party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in United States mail properly addressed to each of them and with first class postage prepaid.

The names and addresses of those served:

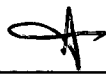
Attorney General of Florida

PL-01 The Capitol

Tallahassee, Florida 32399-1050

I Declare, under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on December 6, 2022.

/s/ 

Jeffrey Todd Crystal

APPENDIX

A

DISTRICT COURT OF APPEAL, FIRST DISTRICT
2000 Drayton Drive
Tallahassee, Florida 32399-0950
Telephone No. (850)488-6151

September 30, 2022

CASE NO.: 1D22-1571
L.T. No.: 2013CF002963

Jeffery T. Crystal

v.

State of Florida

Appellant / Petitioner(s),

Appellee / Respondent(s)

BY ORDER OF THE COURT:

Petitioner's motion docketed August 29, 2022, for rehearing is denied.

I HEREBY CERTIFY that the foregoing is (a true copy of) the original court order.

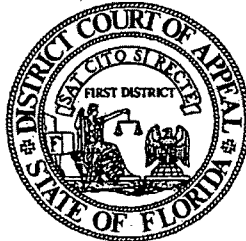
Served:

Hon. Ashley Moody, AG

Jeffery T. Crystal

th


KRISTINA SAMUELS, CLERK



Florida First District Court of Appeal Docket

Case Docket

Case Number: 1D22-1571

Criminal Habeas Corpus Petition from Okaloosa County

Jeffery T. Crystal vs. State of Florida

Lower Tribunal Case(s):2013CF002963

12/14/2022 1:10:44 PM

Date Docketed	Description	Filed By	Notes
05/20/2022	Petition Habeas Corpus	Jeffery T. Crystal	
05/23/2022	Habeas Corpus / Acknowledgement letter		The First District Court of Appeal has received the Petition/Application for Writ of Habeas Corpus filed in this Court on May 20, 2022.
06/03/2022	Docketing Statement		
06/15/2022	Notice of Supplemental Authority	Jeffery T. Crystal	
08/10/2022	Dismissed - Citation		
08/10/2022	Order		This Court's records reflect that, in addition to this petition, Petitioner has filed at least four prior postconviction appeals or petitions in this Court related to Okaloosa County Circuit Court case number 2013-CF-2963, including the following: 1D16-5053, 1D18-5136, 1D19-3824, and 1D20-0708. These cases reveal a history of filing repetitious and frivolous postconviction appeals and petitions. Petitioner has not obtained relief in any of these cases, and his current petition is frivolous. Pursuant to State v. Spencer, 751 So. 2d 47 (Fla. 1999), the Court orders Petitioner to show cause within twenty days of the date of this order why sanctions should not be imposed on him, including a prohibition on further pro se filings in this Court related to the judgment and sentence in Okaloosa County Circuit Court case number 2013-CF-2963 and a referral of this matter to the Department of Corrections for disciplinary action under section 944.279, Florida Statutes. Failure to comply with the terms of this order within the time allowed may result in the imposition of sanctions without further

			opportunity to be heard. See Fla. R. App. P. 9.410.
08/15/2022	Amended Petition	Jeffery T. Crystal	writ of habeas corpus into " Emergency" Prima facie writ of habeas corpus alleging obvious and clear manifest error-plain error that affects the substantial rights of petitioner apparent on the face of appellate record-prima facie evidence
08/22/2022	Filing Stricken		Petitioner has filed an amended petition for writ of habeas corpus. It was provided to prison officials on August 5, 2022, and deemed filed as of that date. The amended petition was not docketed with this court until August 15, 2022. In the interim, this court dismissed the petition for writ of habeas corpus filed May 20, 2022. Petitioner did not seek leave to amend his petition. Accordingly, Petitioner's amended petition is unauthorized and is stricken. On August 10, 2022, this court ordered Petitioner to show cause within twenty days why he should not be prohibited from further pro se filings. That order remains outstanding.
08/26/2022	RESPONSE	Jeffery T. Crystal	to 08/22 order
08/29/2022	Motion For Rehearing	Jeffery T. Crystal	with appendix/exhibits
08/30/2022	Order		This Court's records reflect that, in addition to this petition, Petitioner has filed at least four prior postconviction appeals or petitions in this Court related to Okaloosa County Circuit Court case number 2013-CF-2963, including the following: 1D16-5053, 1D18-5136, 1D19-3824, and 1D20-0708. These cases reveal a history of filing repetitious and frivolous postconviction appeals and petitions. In case 1D20-0708, Petitioner was warned against further frivolous filings. Petitioner has not obtained relief in any of these cases, and his current petition is frivolous. Due to Petitioner's apparent abuse of the legal process by the repetitious and frivolous pro se filings including this case, this Court issued an order in this case directing Petitioner to show cause why he should not be prohibited from further pro se filings in this Court related to the judgment and sentence in Okaloosa County Circuit Court case number 2013-CF-2963 and a referral of this matter to the Department of Corrections for disciplinary action under section 944.279, Florida Statutes. See State v. Spencer, 751 So. 2d 47, 48 (Fla. 1999) (requiring that courts "first provide notice and an opportunity to respond before preventing [a] litigant from bringing further attacks on his or her conviction and sentence."). Petitioner's response did not show good cause to prevent sanctions. Therefore, because Petitioner's

			<p>repetitious, frivolous filings have become an abuse of the legal process, we hold that Petitioner is barred from future pro se filings in this Court related to the judgment and sentence including a prohibition on further pro se filings in this Court related to the judgment and sentence in Okaloosa County Circuit Court case number 2013-CF-2963. The Clerk of the Court is directed not to accept any future filings concerning this case unless they are filed by a member in good standing of The Florida Bar. This includes any post-disposition motion filed in response to this order. This matter is referred to the Department of Corrections for disciplinary procedures as provided in section 944.279, Florida Statutes. See Fla. R. App. P. 9.410.</p>
09/30/2022	Deny Appellant's Motion for Rehearing		<p>Petitioner's motion docketed August 29, 2022, for rehearing is denied.</p>
10/20/2022	West Publishing		
10/21/2022	Notice of Change of Address	Jeffery T. Crystal	