

**OCTOBER TERM 2022**

**No. 22-\_\_\_\_\_**

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IN THE SUPREME COURT OF THE UNITED STATES

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JAIME PIERO COLE,

Petitioner,

v.

BOBBY LUMPKIN, DIRECTOR, TEXAS DEPARTMENT OF CRIMINAL JUSTICE,  
CORRECTIONAL INSTITUTIONS DIVISION,

Respondent.

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**CAPITAL CASE**

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**AMENDMENT TO APPLICATION TO THE HONORABLE SAMUEL A. ALITO, JR.  
FOR EXTENSION OF TIME TO FILE A PETITION FOR A WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT**

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Petitioner Jaime Piero Cole, through undersigned counsel, respectfully moved for an extension of sixty (60) days to prepare and file his Petition for Writ of Certiorari to the United States Court of Appeals for the Fifth Circuit. In accordance with this Court's Rule 13.5, this request was initially made more than ten (10) days in advance of the current filing deadline when undersigned counsel electronically filed an extension request on December 23, 2022. However, due to the severe weather conditions in Philadelphia, which closed the office on Friday, December 23, 2022, undersigned counsel was unable to mail the paper copies of the application that day, and the paper copies were instead sent out following the holiday weekend. Counsel files

this Amendment to provide an explanation for the delay in the Court's receipt of the paper copies.

Respectfully submitted,

/s/ Shawn Nolan  
SHAWN NOLAN  
*Counsel of Record*, Member of the Supreme  
Court Bar  
Chief, Capital Habeas Unit  
Federal Community Defender for the  
Eastern District of Pennsylvania  
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Philadelphia, PA 19106  
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(215) 928-0520

Dated: December 29, 2022

**CERTIFICATE OF SERVICE**

I, Shawn Nolan, hereby certify that on this date I served the foregoing upon the following persons by Federal Express:

Cara Hanna  
Assistant Attorney General  
Office of the Attorney General of Texas  
Post Office Box 12548, Capitol Station  
Austin, Texas 78711-2548

/s/ Shawn Nolan  
Shawn Nolan

Dated: December 29, 2022