

No. _____

IN THE
Supreme Court of the United States

MONTEL WESTLEY,

Petitioner,

v.

STATE OF OHIO,

Respondent.

**On Petition for Writ of Certiorari to the
Ohio Court of the Sixth Judicial Appeals District**

**2nd MOTION FOR EXTENSION OF TIME TO FILE
FOR A CONTINUANCE TO SEASONABLY
FILE A WRIT OF CERTIORARI**

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The Petitioner herein, one Montel Westley, in connection with this cause hereby moves this Court to extend the time for the seasonable filing of his Petition for a Writ of Certiorari. It is currently due herein on April 5, 2024. In support thereof the following contentions are made.

As fate would have it, Counsel has not only had some serious Health problems recently. Indeed, twice within the past eight or nine months he developed COVID 19. Indeed, others in the five-person office have likewise been infected. Specifically his personal Secretary, who is absolutely indispensable to him, because of his hearing difficulties, not only contacted this ailment, which resulted in a family quarantine. Indeed, as fate would have it other members in the office were adversely affected, not only, by their own involvement with ailments, but also by the quarantine, which extended to several others in the area.

While all that was, of course, bad enough: twice within the past eight or nine months, both times Counsel entered into the Cleveland Clinic Hospital through the Emergency Room. Indeed, afterwards a male nurse – until only last week was coming to his home 3 times a week in connection with serious foot operations he had on his right foot that virtually hobbled Counsel. Also, Counsel whose teeth of which were all removed were totally replaced March 19, 2024. Of course, as fate would have it there was the death of a relative in Kentucky, within the last month, which entailed an absence from the city. And now a nephew – a retired North Carolina Judge – is in Hospice care in that State.

To be sure, within months Counsel will be retiring, but in the meantime has several serious Appellate Briefs he is writing – this being one of them. Hopefully this Brief and one other will mark the end of the line for this Attorney. In any event, the effort here being performed is Pro Bono. Hopefully Counsel can be accommodated in this manner. The request here is for forty-five (45) days in which to file a Petition for a Writ of Certiorari.

THEREFORE, the potential petitioner herein prays this Motion be granted.

Respectfully submitted,

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