

IN THE SUPREME COURT OF THE UNITED STATES

JUAN LUIS LEONOR,

Petitioner,

VS.

STATE OF NEBRASKA; and  
DIANA SABATKA-RINE, (former)  
Director of Nebraska Department  
of Correctional Services,

Respondents.

CASE NO.: \_\_\_\_\_

APPLICATION TO EXTEND THE  
TIME TO FILE A PETITION FOR  
A WRIT OF CERTIORARI

TO: SUPREME COURT JUSTICE ALLOTTED TO THE EIGHT CIRCUIT OR TO WHOM IT MAY CONCERN.

COMES NOW, Juan Luis Leonor, Petitioner, and pursuant to U.S. Sup. Ct. Rule 30.3, he asks that the time to file a petition for a writ of certiorari be extended for ninety days. In support, Mr. Leonor offers the following:

1. Mr. Leonor seeks certiorari from a judgment entered by the Nebraska Supreme Court--concerning a criminal matter. The judgment was entered on October 30, 2023. (Exhibit # 1).

2. From October 30, 2023, the ninetieth day for Mr. Leonor to file a petition for certiorari falls on January 28, 2024. Pursuant to U.S. Sup. Ct. Rule 30.2, Mr. Leonor files this application at least 10 days before the specified final filing date.

3. Recently, this Court found that Mr. Leonor has abused the Court's process. See Leonor v. Nebraska, 144 S.Ct. 320 (2023). As a result, the Court has required that Mr. Leonor pay the filing fee of \$ 300.00 dollars if he wants to seek certiorari review and, in addition, to file his petition under U.S. Sup. Ct. Rule 33.1.

4. Although Mr. Leonor acknowledges where the Court is coming from, abusing

the Court's process has never been his intention. Mr. Leonor is acting pro se, and he has never had the assisting hand of an attorney during all his collateral review attempts in both state and federal courts, despite that he has faced to barriers: lack of comprehension of the English Language and lack of comprehension of the law.

5. Mr. Leonor has learned the English Language while incarcerated. During that learning period, Mr. Leonor has relied on other prisoners to assist him with his collateral review proceedings. Although Mr. Leonor now is able to communicate with the courts--through writing, his communication is limited to technical ways; that is, he struggles when it comes to elaborate arguments and in describing events. With that in mind, every petition that Mr. Leonor has filed before the Court, he has done so in a faithful manner, given his own understanding of the complexity of the law, and given that, as of today, he still maintains his innocence.

6. Mr. Leonor asks the Court for an extension of time to file a petition for a writ of certiorari because he will not be able to file it--within the 90 days that he is allowed to by this Court's rules, in the "booklet" format that he is required to do so. In addition, Mr. Leonor has not been able to accumulate the total of the filing fee and, even though he still does not know, also the costs associated with the booklet format.

7. Recently, Mr. Leonor found a place that specializes in creating "booklet" format petitions, and has written them a letter seeking their assistance. See (Exhibit # 2). As stated above, Mr. Leonor is incarcerated and has no access to a computer as to comply with the booklet format of his petition. As of today, Mr. Leonor has not heard back from the printing shop. To be sure, Mr. Leonor has been searching for the printing shop since day one from October 30, 2023.

Given his incarceration, though, he has relied on a friend in the outside to do so. It was through his friend, thus, that Mr. Leonor learned about the printing shop.

8. Also, through his prison job salary, Mr. Leonor will be able to accumulate the amount for the filing fee of \$ 300.00 dollars, in this month of January 2024. And, depending on the charging fees from the printing shop, he may be able to accumulate that amount within the next three months.

9. For those reasons given above, Mr. Leonor respectfully asks this Justice, or the Court, for an extension of time to file his petition for a writ of certiorari for ninety (90) days or more, so that he will file it in accordance to this Court's Rule 33.1.


Respectfully submitted on this 13<sup>th</sup> day of January, 2024.

DECLARATION STATEMENT

I swear or declare that on this date: January 13th, 2024, I deposited in the institution's internal mail system the envelope containing this Application to Extend Time to File A Petition for A Writ of Certiorari, properly addressed to the Office of the Clerk of the United States Supreme Court, Washington D.C. 20543-3001, via U.S. Mail Service, postage prepaid.

I declare under penalty of perjury that the foregoing in this Application is true and correct.

Executed on: January 13<sup>th</sup>, 2024.

  
Juan Luis Leonor DOC# 54664  
Nebraska Correctional Youth Facility  
2610 North 20th Street, East  
Omaha, Nebraska 68110



**CLERK OF THE NEBRASKA SUPREME COURT  
AND NEBRASKA COURT OF APPEALS**

2413 State Capitol, P.O. Box 98910  
Lincoln, Nebraska 68509-8910  
(402) 471-3731

October 30, 2023

Juan L Leonor #54664  
NE Correctional Youth Facility  
2610 North 20th Street  
Omaha, NE 68110

**IN CASE OF:** A-23-000539, Leonor v. Sabatka-Rine  
**TRIAL COURT/ID:** Douglas County District Court CI23-895

**The following filing:** Petition of Appellant for Further Review  
Filed on 10/13/23  
Filed by appellant Juan L Leonor #54664

**Has been reviewed by the court and the following order entered:**

Petition of Appellant for further review denied.

Sincerely,  
Wendy A. Wussow  
Clerk

Exhibit

**1**

January 9<sup>th</sup>, 2024

Juan Luis Leonor DOC# 54664  
Nebraska Correctional Youth Facility  
2610 North 20th Street, east  
Omaha, Nebraska 68110


Cockle Legal Briefs  
2311 Douglas St  
Omaha, Nebraska 68110

To whom it may concern:

My name is Juan Luis Leonor. I am incarcerated. I am considering to file a Petition for a Writ of Certiorari in the United States Supreme Court. The Court, however, has asked me to file the petition in a "booklet format" under U.S. S.Ct. Rule 33.1(a)-(h).

I would like to know how much would it cost me to get my petition as a "booklet format," including the Appendixes attached. Would you provide me with information about how this process is carried out? Thank You!

Sincerely,

  
Juan Luis Leonor DOC# 54664



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CASE NO.: \_\_\_\_\_

PROOF OF SERVICE


COMES NOW, Juan Luis Leonor, and I do swear or declare that on this date: January 13th, 2024, as required by Supreme Court Rules 22.2 and 29, I have served the enclosed Application To Extend The Time To File A Petition For A Writ Of Certiorari on the parties' counsel, by depositing an envelope containing the above documents in the United States mail properly addressed to counsel and with first class postage prepaid.

The name and address of the person served is as follows: :

Michael Hilgers, Nebraska Attorney General, 2115 State Capitol Building,  
Lincoln, Nebraska 68509-8920.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 13, 2024.

  
\_\_\_\_\_  
Juan Luis Leonor DOC# 54664  
Nebraska Correctional Youth Facility  
2610 North 20th Street, East  
Omaha, Nebraska 68110

