

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

JURGEN MARKU,
Petitioner,

v.

STATE OF FLORIDA,
Respondent.

ON PETITION FOR WRIT OF CERTIORARI TO THE FLORIDA FIFTH
DISTRICT COURT OF APPEAL

APPLICATION FOR EXTENSION OF TIME TO FILE
PETITION FOR WRIT OF CERTIORARI

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Counsel for the Petitioner

To the Honorable Clarence Thomas, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Eleventh Circuit:

Introduction

Pursuant to this Court's Rule 13.5, the Petitioner, Jurgen Marku, respectfully requests a sixty-day extension of time within which to file a petition for a writ of certiorari in this Court, to and including July 1, 2024.

Jurisdiction

The opinion of the Florida Fifth District Court of Appeal affirming the Petitioner's convictions was entered on January 2, 2024. The order of the Florida Fifth District Court of Appeal denying the motion for rehearing was entered on February 2, 2024. Unless extended, the time within which to file a petition for a writ of certiorari would expire on May 2, 2024.

The jurisdiction of this Court is invoked under 28 U.S.C. § 1257(a). Copies of the opinion and order of the Florida Fifth District Court of Appeal are included in the appendix to this motion.

Argument

The Petitioner will be seeking certiorari review on the following issue: whether the trial court erred by allowing the jury to be informed that a codefendant entered a guilty plea to murder and robbery charges.

Undersigned counsel's recent circumstances require him to seek an extension of time in this case – as explained below. On February 14, 2024, undersigned counsel's

father had emergency brain surgery – and following the surgery, undersigned counsel was with his father in Melbourne, Florida, (1) at the hospital, (2) through his transition to a rehabilitation center, and then (3) during his transition to an assisted-living home. Undersigned counsel is an only child – meaning that undersigned counsel was not able to share the responsibility of caring for his father with any siblings. And in addition to caring for his father, undersigned counsel has also had to assume handling all of his father’s financial matters. Undersigned counsel is still scheduled to see his father at least two days a week for the next several weeks, and undersigned counsel has been dealing with phone calls involving legal and medical matters on a daily basis.

Therefore, the Petitioner requests an extension of sixty days to file the petition for a writ of certiorari. No party will be prejudiced by the granting of a sixty-day extension in this case.

Accordingly, the Petitioner respectfully requests that an order be entered extending the time to petition for writ of certiorari by sixty days.

Respectfully submitted,

/s/ Michael Ufferman

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CERTIFICATE OF SERVICE

I, Michael Ufferman, a member of the Bar of this Court, hereby certify that on the 10th day of April, 2024, a copy of this Application For Extension of Time To File A Petition For A Writ Of Certiorari in the above-entitled case was mailed, first class postage prepaid, to the Office of the Attorney General, PL-01, The Capitol, Tallahassee, Florida 32399-1050 (counsel for the Respondent herein). I further certify that all parties required to be served have been served.

/s/ Michael Ufferman
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