

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

Jerome Teats — PETITIONER
(Your Name)

vs.

Brandon Watwood — RESPONDENT(S)
Application For Extension To Submit
ON PETITION FOR A WRIT OF CERTIORARI TO

U.S. Court of Appeals, Sixth Circuit
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Jerome Teats Tomis #313227
(Your Name)

960 State Route 212
(Address)

Tiptonville, Tennessee 38079
(City, State, Zip Code)

N/A
(Phone Number)

Pursuant to Supreme Court Rule 13(5) Teats, the petitioner, requests an extension of 60 days to submit a petition for a Writ of Certiorari. The reasons for the request are explained below.

A. The petitioner submitted a Petition for Panel Rehearing. The petition was denied and filed on February 10, 2025. This triggered the 90-day deadline according to Supreme Court Rule 13(3), see exhibits 1-2.

B. The institution Teats is housed at transitioned into ViaPath Tablets in February of 2025. The Westlaw database was not available until the beginning of May 2025. on the Tablet.

C. Around three weeks ago Teats' father passed away, James Teats Sr. Teats had to separate himself from general population in order to gather his thoughts. Teats has not received an obituary or death certificate to send as proof. The Supreme Court office can do a simple internet search of online database obituaries in Nashville, TN to confirm.

D. This will be Teats' last available appeal. After this attempt Teats will not have any other option left to challenge his conviction and protect his constitutional rights. The likelihood of Teats' Writ being accepted is slim to none but he would like to explore this option.

E. The petitioner has several points of concern stemming from the legal concept, "Exhaustion Rule."

I. Did the decision in *Martinez v Ryan* 132 Sct 1309 require claims to be raised beyond the initial collateral proceeding for exhaustion purposes in Tennessee and other States with similar collateral proceeding framework?

II. If exhaustion is still required beyond the initial collateral proceeding, did the petitioner satisfy the "Exhaustion Rule" by submitting his claim to the TN Crim. Ct. of App. by way of Motion to Rehear?

III. When the TCCA gave Teats' Motion to Rehear Petition "full consideration" did it count as a merits adjudication under AEDPA and U.S. Supreme Court authority?

IV. Has the U.S. Supreme Court defined with precision whether a procedural challenge identical to Teats' falls under F.R.C.P. Rule 60(b)(1) or 60(b)(6)?

V. Has the U.S. Supreme Court defined with precision the term "extraordinary circumstances" contained in Rule 60(b)(6)?

F. A 60-day extension is needed so Teats can fully comply with all Supreme Court Rules, research Westlaw, and type up the Writ. The due date for the Writ is currently May 12, 2025 because the 11th falls on a weekend. The 60-day extension would push the date until July 11, 2025. But Teats will gladly accept any amount of time this court sees fit to award.

Conclusion

Wherefore the petitioner prays this Court will grant an extension to submit a Writ of Certiorari for the reasons in this petition or any reason it sees fit.

Respectfully Submitted,
Jerome Teats

Date: May 5, 2025

Proof of Service

I, Jerome Teats, the petitioner, do swear under penalty of perjury, as required by Supreme Court Rule 29 that an exact copy of the foregoing:

Application for extension to submit petition for a writ of Certiorari

was placed in the N.W.C.X. outgoing mailbox on this 5th day of May 2025

US First-Class postage prepaid to:

Clerk

Supreme Court of the United States
Washington, DC 20543

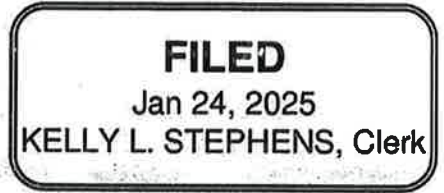
I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 5, 2025

Jerome Teats #313227
NWCX
960 State Route 212
Tiptonville TN 38079

No. 24-5660

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT



JEROME M. TEATS,)	
)	
Petitioner-Appellant,)	
)	
v.)	<u>ORDER</u>
)	
BRANDON WATWOOD, Warden,)	
)	
Respondent-Appellee.)	

Before: BOGGS, WHITE, and RITZ, Circuit Judges.

Jerome M. Teats, a pro se Tennessee prisoner, petitions the court to rehear en banc its order denying his application for a certificate of appealability. The petition has been referred to this panel, on which the original deciding judge does not sit, for an initial determination on the merits of the petition for rehearing. Upon careful consideration, the panel concludes that the original deciding judge did not misapprehend or overlook any point of law or fact in issuing the order and, accordingly, declines to rehear the matter. Fed. R. App. P. 40(b)(1)(A).

The Clerk shall now refer the matter to all of the active members of the court for further proceedings on the suggestion for en banc rehearing.

ENTERED BY ORDER OF THE COURT


Kelly L. Stephens, Clerk

**UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

100 EAST FIFTH STREET, ROOM 540
POTTER STEWART U.S. COURTHOUSE
CINCINNATI, OHIO 45202-3988

Kelly L. Stephens
Clerk

Tel. (513) 564-7000
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Filed: January 24, 2025

Mr. Jerome M. Teats
Northwest Correctional Complex
960 State Route 212
Tiptonville, TN 38079

Re: Case No. 24-5660, *Jerome Teats v. Brandon Watwood*
Originating Case No.: 3:19-cv-00841

Dear Mr. Teats,

The Court issued the enclosed Order today in this case.

Sincerely yours,

s/Beverly L. Harris
En Banc Coordinator
Direct Dial No. 513-564-7077

cc: Mr. Nicholas Bolduc

Enclosure