

UNITED STATES SUPREME COURT

UNITED STATE OF AMERICA,)
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 v.)
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)
 JASON DEE TAYLOR,)
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 Petitioner.)

MOTION REQUESTING AN EXTENSION OF TIME TO FILE
PETITION FOR CERTIORARI

1. STEPHEN N. PREZIOSI, ESQ., affirms under penalties of perjury, that the following facts are true. The source of the information and basis of my beliefs are a review of the court transcripts, a review of my files, and my personal experience with the Bureau of Prisons and contact with clients there imprisoned.
2. This affirmation is submitted pursuant to United States Supreme Court Rule 13.5 in support of my client’s motion for an extension of time to file a petition for certiorari in this Court. The petition is currently due on September 28, 2024, and my request if for a 60 day extension.
3. As attorney for Mr. Jason Dee Taylor, I am seeking the extension of time exclusively on his behalf.

4. I have communicated with opposing counsel, Assistant United States Attorney, Mr. Ross Goldman (202-532-4153), and he consented to the additional time requested.

5. The basis for jurisdiction in this Court is pursuant to 28 U.S.C. §1254(1) whereby cases from the Circuit Courts of Appeal may be reviewed by the Supreme Court by writ of certiorari granted upon the petition of any party. Mr. Jason Dee Taylor's case was decided by the Ninth Circuit Court of Appeals on direct appeal on March 14, 2024. (Exhibit A) Mr. Taylor then sought leave to reargue *en banc* before the Ninth Circuit, which was denied on June 28, 2024. (Exhibit B)

6. Mr. Taylor seeks this Court's review of the Ninth Circuit orders (Exhibits A and B) dated March 14, 2024 and June 28, 2024.

Reasons For The Extension

7. The sole reason for the request of the extension is because Mr. Taylor is incarcerated and communicating with him takes an unusually long time.

8. Because of the nature of the charges against him, Mr. Taylor has been denied access to email, which is available to all other prisoners. This makes communicating with him a very lengthy process as I am forced to use the regular mail to send drafts of briefs, or in this case, a petition.

9. Phone calls are difficult to schedule as the prison is on lock down more often than not because of some incident and prisoners cannot make scheduled phone calls while the facility is on lockdown.

10. Over the past two years that I have represented Mr. Taylor he has been incarcerated at various federal facilities. It typically takes one to two months for him to receive any of my mail, such as drafts of the brief and the reply, which were submitted to the Ninth Circuit.

11. In fact, because of the extreme delays in the prison mail system, I had to request a total of six extensions of time in the Ninth Circuit before Mr. Taylor had received drafts of my briefs and where I could schedule a phone call to discuss the briefs with him.

12. It is for this same reason that I am requesting an extension of time of 60 days to submit the petition for certiorari. The petition is presently due on September 28, 2024, and I am requesting until November 27, 2024 to file the petition.

Dated: September 16, 2024
New York, New York

/S/ Stephen N. Preziosi
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CERTIFICATE OF SERVICE

I hereby certify that on 2024, I electronically filed the foregoing with the Clerk of the Court for the United States Supreme Court and served this motion by regular mail and email on opposing counsel.

Dated: September 16, 2024

New York, New York

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