

SUPREME COURT OF THE UNITED STATES

SALVADOR BRAVO,
Petitioner,

v.

USSC No. 24A876

ATTORNEY GENERAL of the
STATE of NEW MEXICO, et al.,
Respondents

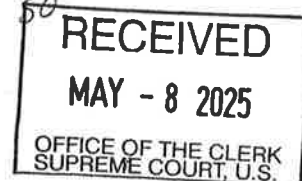
SECOND MOTION FOR EXTENSION OF TIME TO

FILE PETITION FOR WRIT OF CERTIORARI

COMES NOW the Petitioner, Salvador Bravo, ("Mr. Bravo") pro se, and pursuant to USSC Rule 30, hereby respectfully asks this Court for a forty-five (45) day extension of time to file his Petition for Writ of Certiorari to the the United States Court of Appeals for the Tenth Circuit. As grounds for this motion, Mr. Bravo states the following:

RELEVANT PROCEDURAL HISTORY

1. On March 5, 2025, Mr. Bravo asked this Court for an extension of time to file his petition for writ of certiorari, and was granted forty-five (45) days to do so on March 12, 2025.
2. Mr. Bravo's dead line to file such petition is due by May 2, 2025, and this petition is therefore timely filed pursuant to USSC Rule 30.



BASIS FOR GRANTING THE MOTION

3. Because Mr. Bravo is a pro se litigant who is incarcerated within the NMDOC, he needs additional time to adequately research relevant material, authorities, and Rules to properly support his pleading in order to present a meaningful argument to this Court.

4. Being a pro se incarcerated litigant, who is housed at a level 2 facility, has a few hurdles that make it extremely difficult to draft and complete his pleading in a timely manner. For e.g., all level 2 inmates are required to work or program. If inmates do not work or program, they will receive a write up, which ultimately affects the inmates ability to earn good time.

5. Mr. Bravo is currently working 2 jobs, fire safety dept., and commissary. He is also currently programming in a class, Moral Recognition Therapy, ("MRT"), which all take up most of Mr. Bravo's day.

6. In addition to Mr. Bravo's 2 jobs and MRT, there is currently no law library at the Southern New Mexico Correctional Facility, and Mr. Bravo is limited to 2 options: receiving legal material from the New Mexico Supreme Court law library, and authorities or rules from his state issued tablet. The NMSC takes several days being that it is written correspondence, and Mr. Bravo's state issued tablet is only activated during certain periods throughout the day. They completely shut off by 9:00 pm until 6:00 a.m..

7. Being that Mr. Bravo must work and/or program while at this level 2 facility,¹ and being that Mr. Bravo is only limited to the 2 options described above, those restrictions are beyond his control and add an additional hurdle that makes it extremely difficult for Mr. Bravo to timely file his pleading on or before May 2, 2025

8. Because Mr. Bravo is proceeding as a pro se incarcerated litigant and layman of the law, any extra time he is granted is significant because he critically depends on the only time he is allowed to research materials/authorities and rules on his state issued tablet, as well as waiting on written correspondence from the NMSC law library.

RELIEF REQUESTED

THEREFORE, for the reasons stated above, Mr. Bravo is respectfully asking for an additional forty-five (45) days of additional time to timely file his pleading in this Court.

Respectfully submitted,

Salvador Bravo, Petitioner - pro se

1. All inmates at level 2 facilities are close to being released into the community and are all required to work/program as a part of being taught how to re-integrate back into Society.