

IN THE SUPREME COURT OF THE UNITED STATES

---

MARION WILSON,  
*Petitioner-Movant,*

v.

ERIC SELLERS, WARDEN,  
GEORGIA DIAGNOSTIC PRISON,  
*Respondent.*

---

**On Petition for A Writ of Certiorari to  
The United States Court of Appeals For the Eleventh Circuit**

---

**MOTION TO APPOINT COUNSEL UNDER  
SUPREME COURT RULE 39 AND  
THE CRIMINAL JUSTICE ACT**

---

Brian S. Kammer  
*Counsel of Record*  
Georgia Resource Center  
303 Elizabeth St NE  
Atlanta, GA 30307  
brian.kammer@garesource.org  
(404) 222-9202 (phone)

Mark E. Olive  
320 W Jefferson St  
Tallahassee FL 32301  
meolive@aol.com  
(850) 224-0004 (phone)

*Counsel for Petitioner-Movant*

---

---

**MOTION TO APPOINT CO-COUNSEL UNDER SUPREME COURT RULE 39  
AND THE CRIMINAL JUSTICE ACT**

For the reasons set forth below, Petitioner-Movant Marion Wilson respectfully requests, under Supreme Court Rule 39.7 and 18 U.S.C. § 3599(a), that co-counsel Mark E. Olive be appointed as counsel of record for proceedings on the merits in this Court.

1. Undersigned counsel Brian S. Kammer was appointed under the Criminal Justice Act (“CJA”) by the United States Court of Appeals for the Eleventh Circuit.

2. Co-counsel Mark E. Olive appeared pro bono as counsel in the Eleventh Circuit, and appeared pro bono as counsel on the certiorari petition containing the Question for which this Court granted certiorari review.

3. Mr. Olive’s background, knowledge, and experience qualify him to handle proceedings in this case. He has dozens of CJA appointments in capital habeas cases and has consulted in dozens of others. He as appeared as counsel or co-counsel in dozens of cases before this Court, and has argued two capital habeas corpus before this Court previously.

4. Mr. Olive is willing and able to accept appointment as co-counsel for Mr. Wilson.

Respectfully Submitted,

/s/Brian S. Kammer

Brian S. Kammer

*Counsel of Record*

Georgia Resource Center

303 Elizabeth St NE

Atlanta, GA 30307

brian.kammer@garesource.org

(404) 222-9202 (phone)

/s/Mark E. Olive

Mark E. Olive

320 W Jefferson St

Tallahassee FL 32301

[meolive@aol.com](mailto:meolive@aol.com)

(850) 224-0004 (phone)

November 15, 2017

*Counsel for Petitioner-Movant*

**CERTIFICATE OF SERVICE**

I, Brian S. Kammer, counsel for Petitioner-Applicant Marion Wilson and a member of the Bar of this Court, certify that on November 15, 2017, a copy of this Motion was electronically mailed to counsel for Respondent:

Sarah Warren  
Solicitor General  
Office of the Attorney General  
40 Capitol Square SW  
Atlanta, GA 30334  
[Tel.] (404) 463-0770  
swarren@law.ga.gov

I further certify that all parties required to be served have been served.

/s/ Brian S. Kammer  
Brian S. Kammer  
*Counsel of Record*  
Georgia Resource Center  
303 Elizabeth St NE  
Atlanta, GA 30307  
brian.kammer@garesource.org  
404-222-9202 (phone)

*Attorney for Petitioner-Movant*