

No. 18-6286

IN THE  
**SUPREME COURT OF THE UNITED STATES**

LISA JO CHAMBERLIN,  
*Petitioner,*

v.

MARSHALL FISHER,  
*Respondents.*

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**APPLICATION FOR A FOURTEEN (14) DAY  
EXTENSION OF TIME IN WHICH TO FILE A  
RESPONSE TO THE PETITION FOR A WRIT OF  
CERTIORARI**

TO: THE HONORABLE SAMUEL A. ALITO, JR., ASSOCIATE JUSTICE OF THE UNITED STATES SUPREME COURT, AND CIRCUIT JUSTICE FOR THE FIFTH CIRCUIT.

Pursuant to Rules 30 and 22, the Respondents respectfully requests a fourteen (14) day extension of time within which to file their response to the petition for writ of certiorari in this Court, up to and including December 19, 2018. In support of this application, the Respondents state the following grounds:

1. This is a death penalty case. Counsel for the Respondents works exclusively on death penalty cases at all levels of the appellate process. As such, counsel for the Respondents has a substantial work load of other active cases.

2. In the last, month counsel has filed or is actively working on responses and/or briefs in the following cases:

- *Evans v. State*, 2017-DR-01385, brief pending in the Mississippi Supreme Court
- *Bennett v. State*, 61CI108-CV-0234, numerous responses to motions in the trial court
- *Garcia v. State*, 2018-M1353-SCT, response to motion for interlocutory appeal in the Mississippi Supreme Court
- *Le v. State*, 2018-M-1478-SCT, response to motion for interlocutory appeal in the Mississippi Supreme Court along with preparation for an evidentiary hearing in the trial court, 2002-100067
- *Pitchford v. State*, 4:18-CV-0002, response to federal habeas petition and numerous motions

Along with these written responses and/or filings, counsel has also attended hearings in the following cases:

- *Chase v. Fisher*, 3:15-CV-0799, attended hearing in federal court district court
- *Corrothers v. State*, L17-309, attended hearing in the trial court

Counsel also dedicated a substantial amount of time preparing for and attending an evidentiary hearing in *Keller v. State*, A2402-2017-0090, which took place in the trial court from November 27, 2018 through November 29, 2018. Counsel prepared and presented cross examination for approximately twenty-three (23) witnesses subpoenaed by the petitioner including two mental health experts. As a result of this hearing, counsel was out of the office for most of a week.

3. Counsel has attempted to contact counsel for the Petitioner but has not received any response as of this filing.

4. This request is made in good faith and no for purposes of delay and will not prejudice the Petitioner in any manner. The request is necessary so that the Respondents can provide a proper

and meaningful response to the issues raised in the petition for writ of certiorari.

WHEREFORE, for the foregoing reasons, the Respondents respectfully requests that Justice Alito, in his capacity as Circuit Justice for the Fifth Circuit, issue an order granting the Respondents fourteen (14) days, up to and including December 19, 2018, within which to respond to the petition for writ of certiorari.

Respectfully submitted,

s/ *Cameron L. Benton*

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