

IN THE
Supreme Court of the United States

EULANDAS “JAY” FLOWERS,
Petitioner,

vs.

RYAN THORNELL, DIRECTOR OF THE ARIZONA
DEPARTMENT OF CORRECTIONS, ET AL.,
Respondents.

**ON APPLICATION FOR AN EXTENSION OF TIME
TO FILE A PETITION FOR A WRIT OF CERTIORARI**

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TO THE HONORABLE ELENA KAGAN, CIRCUIT JUSTICE FOR THE NINTH
CIRCUIT:

Pursuant to Rules 13.5 and 30, petitioner Eulandas “Jay” Flowers respectfully asks the Court for a 60-day extension of time, to and including December 8, 2023, to file a petition for a writ of certiorari in this matter.

The court of appeals issued a memorandum decision affirming the district court’s denial of habeas corpus relief on January 27, 2023. (App. A) The court of appeals denied a timely filed petition for rehearing on July 11, 2023. (App. B) This Court’s jurisdiction is invoked under 28 U.S.C. § 1254(1).

This extension is necessary to accommodate Mr. Flowers’s counsel’s other workload. Since the court of appeals denied rehearing in this case, counsel has (1) presented oral argument in *United States v. Kenneth Walker*, No. 22-5076 (10th Cir.); (2) filed opening briefs in *Kenneth Laird v. Ryan Thornell*, No. 18-16634 (9th Cir.), and *Luis Bautista v. Ryan Thornell*, No. 18-15471 (9th Cir.); (3) reviewed the record in a proceeding under 28 U.S.C. § 2255, filed and was granted a motion for a subpoena, and reviewed part of the responsive materials in *Aaron Ordonez v. United States*, No. 2:22-cv-

752-PHX-DGC (D. Ariz.); (4) reviewed the record and prepared a draft of an opening brief in *United States v. Robert Perry*, No. 23-5025 (10th Cir.), before concluding that professional considerations required withdrawal as counsel; and (5) prepared and filed a petition for certiorari in *Nawallah Tiger v. Oklahoma*, No. 23-5119 (U.S.). Additionally, Mr. Flowers's counsel is scheduled for international travel from October 5–16, 2023.

Mr. Flowers's counsel has begun a draft of the petition for certiorari. However, because of these other commitments, Mr. Flowers respectfully asks the Court to extend the time for filing a petition for certiorari to and including December 8, 2023.

Respectfully submitted:

September 28, 2023.

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