

September 28, 2023

Robert R. Snyder, AC9136
Salinas Valley State Prison
P.O. Box 1050
Soledad, CA 93960

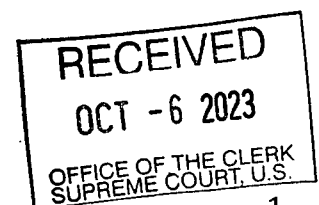
The Honorable Justice Elena Kagan
Associate Justice, The U.S. Supreme Court
1 First Street, N.E.
Washington, DC 20543

Dear Justice Kagan,

I. Introduction to Motion for Extension of Time

Petitioner Robert Snyder humbly submits this motion before the court under Supreme Court Rules, Rule 30 to extend the 90-day timetable to file a petition for Certiorari.

Attached hereto to this motion is evidence which serves to establish the facts that good cause exists for this Court to extend such deadline. Petitioner fairly presented his Habeas Corpus claims to all three levels of California's courts of justice. Most importantly, case No. S280298 was filed in the California Supreme Court on May 30th, 2023 and was denied on July 12th, 2023. The ordinary deadline under Rule 13 would be October 11th, 2023. The foregoing Discussion respectfully prays that this Court would grant this extraordinary request for the reasons set forth below.



II. Discussion

Rule 30.2 sets forth that the motion to extend must present the 'most extraordinary' circumstances to qualify for the said extension. Petitioner argues that this applies in this case. He was subjected to two involuntary transfers from one institution to another in the last 90 days; within the ambit of the 90-day timeframe per Rule 13. On June 23rd, Petitioner Snyder was transferred from CSAT-F to Coalinga State Hospital. On August 3rd, 2023 he was then sent from Coalinga to Salinas Valley State Prison "SVSP". He has yet to receive his property as of this date. Snyder has included evidence of this in the attachments.

Additionally, his current location SVSP has a policy whereby he is categorically denied physical library access at this time. As well, the kiosk is broken as admitted by the Librarian on C-facility, where petitioner is located. These hardships have been very difficult if not impossible to work around. Petitioner *sub-judice* intends to file his important, novel constitutional claims against his conviction, however will require additional time to do so.

III. Conclusion

Petitioner Robert Snyder respectfully requests that this court extend the time to file Certiorari until November 25th, 2023. Thank you.


Robert R. Snyder

DATE:
September 28, 2023