

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

ISAIAH KAIN SALAS-MARTINEZ,
Petitioner,

v.

TEXAS,
Respondent.

On Petition for a Writ of Certiorari to
the Texas Court of Criminal Appeals

**APPLICATION FOR A SIXTY-DAY EXTENSION OF TIME
TO FILE A PETITION FOR A WRIT OF CERTIORARI
TO THE TEXAS COURT OF CRIMINAL APPEALS**

To the Honorable Samuel Alito, Associate Justice, and Circuit Justice for the United States Court of Appeals for the Fifth Circuit:

Pursuant to Supreme Court Rules 13.5, 22, and 30, Petitioner Isaiah Kain Salas-Martinez respectfully seeks a sixty-day extension of time, until August 3, 2026, to file a petition for a writ of certiorari seeking review of the Texas Court of Criminal Appeal's ("CCA") judgment issued January 15, 2026, in an unpublished order, *Salas-Martinez v. State*, No. PD-1076-24 (Tex. Crim. App. Jan. 15, 2026). See Appendix A. Counsel for Respondent does not oppose the requested sixty-day extension.

1. On January 15, 2026, the CCA issued an unpublished order dismissing Salas-Martinez's petition for discretionary review as improvidently granted.
2. Salas-Martinez timely sought rehearing.
3. On March 5, 2026, the CCA denied his petition for rehearing without opinion. Judge Parker, joined by Judge Finley, issued a sixteen-page published opinion concurring in the decision to deny rehearing.
4. At present, Salas Martinez has until June 3, 2026, to file a petition for a writ of certiorari seeking review of the CCA's judgment. *See* S. Ct. R. 13.1.
5. This Court has jurisdiction pursuant 28 U.S.C. § 1257(a).
6. Pursuant to Rules 13.5 and Rule 30.3, this Court may extend the time for seeking certiorari for up to sixty additional days.
7. Undersigned Counsel respectfully seek this extension of time because of the importance of the issue in this case and Counsel's obligations in other matters.
8. Attorneys Dow and Newberry were Counsel for Edward Lee Busby, who was executed on May 14, 2026. Dow and Newberry spent significant time this Spring pursuing relief for Busby in the federal courts.

Conclusion

For the foregoing reasons, this application for extension of time should be granted, extending Salas-Martinez's time to file a petition for writ of certiorari for sixty days, or until August 3, 2026.

DATE: May 26, 2026

Respectfully submitted,

/s/ David R. Dow

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