

No. _____

IN THE SUPREME COURT OF THE UNITED STATES OF AMERICA

LEDALE NATHAN,

Petitioner,

vs.

HEATHER COFER, Warden, Potosi Correctional Center

and

CATHERINE L. HANAWAY, Attorney General, State of Missouri,

Respondents.

**APPLICATION FOR EXTENSION OF TIME
IN WHICH TO FILE PETITION FOR A WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT**

TO: THE HONORABLE BRETT M. KAVANAUGH, ASSOCIATE JUSTICE OF
THE UNITED STATES SUPREME COURT, AND CIRCUIT JUSTICE FOR
THE EIGHTH CIRCUIT:

Pursuant to United States Supreme Court Rule 13.5, Petitioner requests a
thirty (30) day extension of time in which to file hIS Petition for a Writ of Certiorari
in this Court up to and including October 29, 2025 (thirty days from the current
deadline of September 29, 2025). In support of this Application, Mr. Nathan states:

1. Petitioner, Ledale Nathan, is a Missouri prisoner housed currently at
the Potosi Correctional Center in Mineral Point, Missouri.

2. Mr. Nathan seeks review in this Court of the decision of the United States Court of Appeals for the Eighth Circuit denying a certificate of appealability as to any of the grounds for relief in his habeas corpus petition. A copy of the order denying the certificate of appealability, entered on July 1, 2025, is attached. No petition for rehearing was filed.

3. Mr. Nathan's time in which to petition this Court for a Writ of Certiorari expires on September 29, 2025 (90 days calculated from July 1, 2025).

4. Pursuant to United States Supreme Court Rule 13.5, this Application is being filed more than ten days before September 29, 2025.

5. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1254.

6. Undersigned counsel have represented Mr. Nathan pro bono in all prior proceedings regarding his federal habeas corpus petition and intend to continue to represent him pro bono in this Court, unless appointed.

7. During the period for preparing a certiorari petition in this matter, counsel Parish conducted an evidentiary hearing in Kentucky in *State v. Meece*, a capital post-conviction case, at the end of July. Preparation for and conducting that hearing consumed more than 160 hours her time during that month on that case alone. During August, Ms. Parish prepared for an extensive federal criminal trial involving multiple Hobbes Act robberies in *United States v. Williams* in the U.S. Eastern District of Missouri. While a plea was entered two weeks prior to the scheduled trial, preparation for the trial consumed her time through late AugustAugust. Counsel Parish also filed an extensive post-conviction motion in a homicide case on September 4th in *State v. Stevenson*. Counsel Carlyle has prepared

proposed findings of fact and conclusions of law in *State v. Martin*, a Greene County, Missouri post-conviction case, a reply brief in *Alexander v. State* in the Missouri Court of Appeals, Eastern District, a reply brief in the U.S. Court of Appeals, Eighth Circuit in *United States v. Bolton*, prepared for and conducted a continuing legal education webinar on the criminal law cases from the last term of the United States Supreme Court, and filed a petition for writ of certiorari in this Court in *Nguyen v. McBee*. In addition, Counsel Carlyle underwent surgery on August 29, 2025, and did limited work from that date until September 15, 2025. Both counsel worked together on an extensive post-conviction motion that was filed on July 3, 2025, and are currently engaged in pro bono advocacy in support of Lance Shockley, scheduled to be executed in Missouri on October 14, 2025.

8. Mr. Nathan has not previously petitioned this Court for an extension of time in which to file a Petition for a Writ of Certiorari.

9. This Application is made in good faith and not for purposes of delay.

Wherefore, Mr. Nathan requests that an order issue establishing the due date for Petitioner's Petition for a Writ of Certiorari as October 29, 2025.

Dated September 19, 2025.

Respectfully submitted,

/s/ Kathryn B. Parish

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