

No.

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IN THE  
SUPREME COURT OF THE UNITED STATES

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JEROME MACK,

PETITIONER,

V.

J. COLLADO

RESPONDENT.

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APPLICATION TO FILE BRIEF IN EXCESS OF WORD LIMITATION

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To. The Honorable Supreme Court Justice Ketanji Brown Jackson.

Petitioner respectfully request leave to file a petition for a writ of certiorari in the amount of 90 pages on the merits. In support of this Application Petitioner states:

[1]. I Jerome Mack 15-A-2518, am the petitioner in the above titled action. That I am a layman and do not fully understand most if not all of this courts and procedures, as I am proceeding in a pro-se capacity.

[2]. The reason petitioner seeks permission to file his petition in excess of 40 pages pursuant to Supreme Court Rule 33.2(b), and asked the Court to waive such limitations on the basis of this Application for good cause shown pursuant to Supreme Court Rules 33.1(d), is because it is impossible for him to explain the many proceeding, and multiple hearing had in this matter.

[3]. Petitioner's trial alone was long, and took over two weeks to conclude which resulted in his conviction.

[4]. The records of these proceeding alone are all extensive and are critical to vital grounds raised in his petition, as petitioner made mention to a number of facts and well established laws as set forth by this Honorable Court relating to those proceedings.

[5]. In the State Court Appellate Division petitioner raised sixteen grounds on direct review which are very complex issues, two of which involves mixed questions of law and fact which as this court is aware, on federal habeas review, translates into mixed constitutional questions. To which petitioner contended in the lower courts, and now brings forth for review in this court, that the lower courts failed to apply the appropriate application of law as set forth by this court to the particular facts of petitioner's case in accordance the (AEDPA) 28 U.S.C. 2254(d)(1). And a ineffective assistance of trial counsel claim which is in of it self layered in a number of points as well.

[6]. Petitioner's original traverse filed in the District Court was 144 pages to which he was granted permission in that court to file such oversize petition.

[7]. However, petitioner has made every effort to concise and reduce the number of pages, and was only able to get it down to 90 without taking away from the constitutional nature of his claims, where his case is almost an entirely factual one with extensive references to the multiple hearings as stated above.

[8]. THEREFORE, without permission to file a petition IN EXCESS OF WORD LIMITATION petitioner would not be able to fully bring to this Honorable Court's attention the many claims, proceedings, and violations of his constitutional rights that he is asking this Court to review. As a granting of this application will most certainly

result in conservation of Judaical resources and avoid unnecessary repetition of facts and arguments.

**WHEREFORE:** Petitioner respectfully request that this Honorable Court grant this application to file his petition in excess of word limitation, so that he may have his full day in court, as a denial would surely result in a denial of due process and fair play.

  
\_\_\_\_\_  
Signature of petitioner

Respectfully Submitted by

  
\_\_\_\_\_  
Jerome Mack 15-A-2518

I, Jerome Mack, declare and verify under the penalty of perjury [28 U.S.C. §1746; 18 U.S.C §1621] that the forgoing is true and correct and that this (Application to file petition IN excess of word limitation) was placed IN the prison mail box at the Shawangunk Correctional Facility, P.O. Box 700, Wallkill New York 12589, Executed On August 18th 2024.