

No. __-_____

IN THE SUPREME COURT OF THE UNITED STATES

MARTEZ ABRAM,

Petitioner,

v.

STATE OF MISSISSIPPI

Respondent,

APPLICATION FOR EXTENSION OF TIME TO FILE PETITION
FOR WRIT OF CERTIORARI

THIS IS A CAPITAL CASE

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**Counsel of Record*

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To the Honorable Samuel A. Alito, Jr., Associate Justice of the United States
and Circuit Justice for the Fifth Circuit:

COMES NOW the Petitioner, Martez Abram, an indigent defendant, by and
through undersigned counsel, and pursuant to 28 U.S.C.A. § 1257(a) and Supreme
Court Rule 13.5, respectfully requests an extension of time of thirty (30) days within
which to file a Petition for Writ of Certiorari in this Court. Petitioner intends to seek
review of a decision of the Mississippi Supreme Court denying his direct appeal. That
decision became final on October 16, 2025, *Abram v. State*, 420 So.3d 881 (Miss.
August 7, 2025) (attached as Appendix A), rehearing denied October 16, 2025)
(attached as Appendix B).

Mr. Abram's time to file a Petition for a Writ of Certiorari in this Court
currently expires on January 14, 2026. This request for an extension of time to
prepare and file the petition is made for the following reasons.

1. Undersigned counsel did not represent Mr. Abram in state court and needed to review a 19-volume transcript.
2. Over the past three months, Ms. Ferraro has filed four appellate briefs in *Brandon Kerayle Brinkley v. State of Mississippi*, No. 2025-KA-00242-COA on October 17, 2025; *Rantelvin D. Richardson v. State of Mississippi*, No. 2025-KA-00537-COA on November 24, 2025; *Lisa Logan v. State of Mississippi*, No. 2024-KA-00950-COA on December 1, 2025 (supplemental brief), in *Anderson v. State of Mississippi*, No. 2025-KA-00587-COA on December 18, 2025, and a Petition for Writ of Certiorari to the Mississippi Supreme Court in *David Swims v. State of Mississippi*, No. 2023-CT-01244-SCT on December 9, 2025. Ms. Ferraro also has briefs due on December 23, 2025, in *Glenn Antoine Rash v. State of Mississippi*, No. 2025-KA-00595-COA, on January 7, 2026, in *Zayrick Keune Taylor v. State of Mississippi*, No. 2025-KA-000602-COA, on January 17, 2026, in *Marvin Ivey v. State of Mississippi*, No. 2025-KA-00326-COA.
3. Over the past three months, Mr. Spore has been preparing for capital murder trials in *State v. Rivers*, No. 18CI1:25-cr-00040, *State v. Crum*, No. 69CI1:23-cr-00067-JM, *State v. Fulgham* No. 67CI1:24-cr-00010. In addition, Mr. Spore has a Reply Brief due in *Joseph David Hearn v. State of Mississippi*, No. 2024-DP-00802-SCT on January 9, 2026.
4. This is Petitioner's first motion for extension of time from this Court.

5. Undersigned counsel has consulted with Assistant Attorney General and Director of the Criminal Appeals Division, Ashley L. Sulser and the State does not oppose this request to seek a thirty (30) day extension.

WHEREFORE, undersigned counsel respectfully requests an extension of time of thirty (30) days to prepare and file the Petition for Writ of Certiorari in this case making the petition due on February 13, 2026.

Respectfully submitted, this the 19th day of December 2025.

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