

No. 25-
(CAPITAL CASE)

IN THE
Supreme Court of the United States

TAYLOR RENE PARKER, APPLICANT,

v.

THE STATE OF TEXAS, RESPONDENT.

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

Caitlin Halpern*
Counsel of Record and member
of the Supreme Court Bar
Connor Burwell
GIBBS & BRUNS LLP
1100 Louisiana St, Suite 5300
Houston, TX 77002
Telephone: 713-650-8805
Facsimile: 713-750-0903
chalpern@gibbsbruns.com
cburwell@gibbsbruns.com

Counsel for Applicant

January 14, 2026

APPLICATION

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

Pursuant to Rule 13.5 of the Rules of this Court and 28 U.S.C. § 2101(c), applicant Taylor Rene Parker, an indigent Texas death-row inmate, respectfully requests a 60-day extension of time, to and including April 6, 2026,¹ within which to file a petition for a writ of certiorari to review the judgment of the Court of Criminal Appeals of Texas in this case. In support of this application, Ms. Parker states:

1. Ms. Parker intends to file a petition for writ of certiorari challenging the Texas Court of Criminal Appeals' judgment affirming her conviction and death sentence on direct review, which was entered on November 6, 2025. *See Parker v. State, --- S.W.3d ---, 2025 WL 3127402 (Tex. Ct. Crim. App. Nov. 6, 2025)* (Appendix A).

2. Unless extended, the time to file a petition for certiorari will expire on February 4, 2026. This application is being filed more than ten days before the petition is currently due and is supported by good cause, as set forth below. *See Sup. Ct. R. 13.5.* The jurisdiction of this Court would be invoked under 28 U.S.C. § 1257(a).

3. Applicant retained undersigned pro bono counsel, Caitlin Halpern of Gibbs & Bruns LLP, during Applicant's direct appeal to the Texas Court of Criminal Appeals. The trial record was, by the prosecutor's own account, one of the most

¹ Ms. Parker's current filing deadline is February 4, 2026. Sixty days from February 4, 2026, is Sunday, April 5, 2026. April 6, 2026, is the "next day that is not a Saturday, Sunday, [or] federal legal holiday." Rule 30.1.

complex and voluminous in Bowie County history. Counsel raised 25 points of error on appeal, which must be carefully analyzed and researched to identify those appropriate for this Court's review.

4. Additionally, undersigned counsel has competing professional obligations in other matters that make it exceedingly difficult to prepare the petition without an extension of time. Ms. Halpern is responsible for completing depositions across several dates in early 2026 in *FSTI, Inc. v. PVS Minibulk, Inc. and PVS DX, Inc.*, No. D-1-GN-24-001564, in the District Court of Travis County, Texas, wherein she is counsel for defendants/counter-plaintiffs, as well as *Ramos v. Erwin*, No. 4:23-cv-2517, in the United States District Court for the Southern District of Texas, wherein she is counsel for the plaintiff. Furthermore, she is presenting oral argument for appellant Pacific Investment Management Company and a group of other senior certificate holders in *In the Matter of the Application of Wells Fargo Bank, NA*, Case No. 2025-04773, in the New York Supreme Court Appellate Division—First Department, which is expected to occur in February 2026.

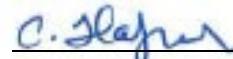
5. In light of counsel's current obligations, and the importance of the constitutional issues that will be presented in this capital case, counsel submits that a sixty-day extension is necessary and appropriate to effectively prepare the petition for a writ of certiorari on Ms. Parker's behalf.

6. Applicant has not previously applied to this Court for an extension of time in which to file a petition for a writ of certiorari.

7. This application is made in good faith and not for purposes of delay.

Accordingly, Applicant respectfully requests that an order be entered extending the time to file a petition for certiorari to and including April 6, 2026.

Respectfully submitted,



Caitlin Halpern*

*Counsel of Record and Member
of the Supreme Court Bar*
Connor Burwell
GIBBS & BRUNS LLP
1100 Louisiana St, Suite 5300
Houston, TX 77002
Telephone: 713-650-8805
Facsimile: 713-750-0903
chalpern@gibbsbruns.com
cburwell@gibbsbruns.com

Counsel for Applicant

January 14, 2026