

CAPITAL CASE

Application No. _____

IN THE SUPREME COURT OF THE UNITED STATES

WILLIAM HARRY MEECE,

Petitioner,

vs.

THE HONORABLE JOHN J. GRISE, JUDGE
WARREN COUNTY CIRCUIT COURT

Respondent,

and

COMMONWEALTH OF KENTUCKY

Real Party In Interest.

**APPLICATION FOR A THIRTY (30) DAY EXTENSION OF TIME IN
WHICH TO FILE PETITION FOR A WRIT OF CERTIORARI**

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

Pursuant to Rule 13.5, Petitioner respectfully 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 23, 2026. In support of this application, Petitioner states:

1. William Harry Meece was convicted of three murders and sentenced to death. He intends to seek discretionary review in this

Court, pursuant to 28 U.S.C. § 1257(a) of Opinion and Order of the Kentucky Supreme Court denying a writ of prohibition arising out of his post-conviction case. *Meece v. Grise*, No. 2025-SC-0299-OA, decided February 19, 2026, rehearing denied June 25, 2026 (Attached).

2. Pursuant to Rule 13, Petitioner's petition for a writ of certiorari is currently due on or before September 23, 2026.

3. In this petition, Petitioner intends to advance arguments about the potential waiver or non-waiver of one's Fifth Amendment privilege in post-conviction proceedings and whether the filing of an affidavit or required verification with a post-conviction petition means that the Commonwealth may call Mr. Meece as the sole witness against himself in their case against him where he has elected not to testify.

4. Mr. Meece is indigent and is represented by undersigned appointed counsel pursuant to a Contract with the Department of Public Advocacy in Kentucky. During the period for filing this petition, undersigned counsel filed briefing and presented argument on legal issues arising in a post-conviction case, a Petition for Rehearing in the Eighth Circuit, and multiple Sentencing Memoranda and other pleadings in federal court. Counsel also travelled out of state for a case

hearing in *People v. Amigon*, for a client meeting in *United States v. Simms*, as well as for a capital habeas conference. Counsel has also travelled in-state for multiple cases and client visits. Counsel also engaged in extensive review and work on a federal fraud case involving more than 135,000 pages of discovery and for which counsel was appointed only four months before a trial date that counsel has been advised is a solid trial date. In addition to her appellate and post-conviction practice, counsel maintains a significant practice in CJA cases in the federal district court as well as some state court practice, and has engaged in multiple plea and sentencing hearings and other federal court hearings during this time. Counsel is part of a two-person statewide law partnership and therefore, aside from case consultations, the bulk of the work she is doing outside of the capital context is without the assistance of support staff, associates, or other attorneys. Despite this, counsel has spent significant time over the past three months researching and drafting the Petition for Certiorari in Mr. Meece's case. Given the importance of the issues being presented to this Court and the very high stakes for Mr. Meece, counsel is seeking more time to complete her research and drafting of the Petition for Certiorari

and to consult with other more seasoned capital and Supreme Court practitioners to assure that she is presenting the issues in the most effective and efficient manner possible before this Court.

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

6. The extension is being filed in good faith and to assure that Mr. Meece's counsel provides him effective assistance in all of his proceedings, including the proceedings before this Court. It is not being filed for purposes of delay.

WHEREFORE, for the foregoing reasons, petitioner respectfully requests that Justice Kavanaugh, in his capacity as Circuit Justice for the Sixth Circuit, issue an order granting petitioner a thirty (30) day extension of time up to and including October 23, 2026, in which to file his petition for a writ of certiorari.

Respectfully Submitted,

/s/ Kathryn B. Parish

KATHRYN B. PARISH
(Counsel of Record)
Carlyle Parish LLC
3407 Jefferson, #128
Saint Louis, MO 63118

(816) 525-6540