

24A130

No.23-2411

ORIGINAL

IN THE  
SUPREME COURT OF THE UNITED STATES

KEITH VERNON DAVIS-PETITIONER  
vs.  
DAVID CLOSE, SUPERTENDENT, S.C.I. HOUTZDALE

FILED  
JUL 02 2024  
OFFICE OF THE CLERK  
SUPREME COURT, U.S.

APPLICATION TO EXCEED WORD COUNT


This application should be held to "less stringent standards than formal pleading drafted by a lawyer." *Hanies v. Kerner*, 404 U.S. 519, 520 (1972)

KEITH VERNON DAVIS, Petitioner, pro se respectfully request permission to exceed word count and in support avers the following:

1. Petitioner's writ raises complex and important issues which can not be fully presented in the number of pages allowed.
2. On appeal, Petitioner raises the following arguments with respect to his unknowing plead of guilt, conflicted representation, suppression of favorable and impeachment evidence; the sufficiency of the alleged evidence and the denial of a fair and impartial proceeding (trial).

WHEREFORE, petitioner respectfully requests leave to exceed word count.

Respectfully submitted

  
S.C.I HOUTZDALE  
209 INSTITUTION DRIVE  
HOUTZDALE, PA 16698  
Pro Se Petitioner

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