

DOCKET No. \_\_\_\_\_

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IN THE  
**Supreme Court of the United States**

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ALLEN WARD COX,

Petitioner,

v.

SECRETARY, DEPARTMENT OF CORRECTIONS,  
ATTORNEY GENERAL, STATE OF FLORIDA,

Respondents.

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**APPLICATION FOR SIXTY (60) DAY  
EXTENSION OF TIME TO FILE PETITION  
FOR A WRIT OF CERTIORARI TO THE  
FLORIDA SUPREME COURT**

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*To the Honorable Clarence Thomas, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Eleventh Circuit:*

1. PETITIONER, Allen Ward Cox, (“Cox”), by and through undersigned counsel, respectfully applies to this Court for an extension of time of sixty (60) days to file his Petition for a Writ of Certiorari to the Florida Supreme Court, pursuant to Supreme Court Rule 13. This Court has jurisdiction based on 28 U.S.C. § 1257. In support of his application, Petitioner states as follows:

2. Cox is an indigent death-sentenced inmate in the custody of the State of Florida. Cox was convicted of murder and sentenced to death in the Circuit Court of the Fifth Judicial Circuit in and for Lake County, Florida.

3. Undersigned counsel of record was appointed to represent Cox in his postconviction collateral proceedings.

4. This case involves an appeal from a decision of the Florida Supreme Court, which issued an opinion denying direct appeal relief on July 11, 2024. (Attachment A).

5. Calculating the time for Cox to file a Petition for a Writ of Certiorari, the 90th day would fall on Wednesday, October 9, 2024.

6. Cox will file a Petition for a Writ of Certiorari in this Court.

7. Petitioner and undersigned counsel shows the following good cause in support of this application to extend the period of time for filing for an additional sixty (60) days.

8. Petitioner's counsel of record and co-counsel are employed by the Law Office of the Capital Collateral Regional Counsel-Middle Region ("CCRC-M"), a State of Florida governmental agency.

9. CCRC-M, and undersigned counsel specifically, has recently litigated the Loran Cole death warrant, as the death warrant was signed by the Governor of Florida on July 29, 2024 and Mr. Cole was executed on August 29, 2024.

10. Therefore, undersigned counsel was unable to devote adequate time to cases other than Loran Cole's case during that time period. Undersigned counsel also has impending deadlines in the other cases that undersigned counsel is responsible for.

11. As a result, Cox respectfully requests an extension of sixty (60) days in

order to devote adequate time to the preparation and filing of Cox's Petition for a Writ of Certiorari, with the consultation and assistance of outside counsel.

WHEREFORE, Petitioner, through his undersigned counsel, respectfully applies for an extension of time of sixty (60) days within which to file the Petition for a Writ of Certiorari to the Florida Supreme Court in the above-styled case.

Respectfully submitted,

/s/ Ali A. Shakoor

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Ali A. Shakoor\*

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September 30, 2024

Date