

IN THE
SUPREME COURT
OF THE UNITED STATES

HUGO RANGEL-BOTELLO
- PETITIONER, PROSE

V.

KEN PAXTON, ATTORNEY
GENERAL OF TEXAS



MOTION FOR EXTENSION OF TIME
ON FILING A PETITION FOR WRIT OF CERTIORARI

Comes now Petitioner Hugo Rangel-Botello, Prose pursuant to Section 2101(c) of Title 28 of The United States Code and U.S. Supreme Court Rule 30 requesting that this Honorable Court grant an extension of time in filing a petition for a Writ of Certiorari. Petitioner Rangel bases this request on the following facts:

1.) On December 22, 2023 Petitioner Rangel filed an Application for a Writ of Habeas Corpus in the 105th District Court of Kleberg County, Texas. Said Application was filed under Cause no. 15-CRF-0006-S1 and claimed ineffective assistance of counsel in regards to a plea agreement that was entered unintelligently, unknowingly, and involuntarily (see Records)

2.) On February 7, 2024 The District Court sent to Petitioner Rangel "State's Answer to Defendant's Application For Writ of Habeas Corpus pursuant to Art. 11.07 of The Texas Code of

Criminal Procedure" and "State's Proposed Finding of Fact and Conclusions of Law." Both documents were sent bearing cause no. 15-CRF-0006-S1-A. Petitioner Rangel filed a Reply on February 12, 2024 contesting the State's findings. (See Records) There was no reply from the District Court.

Furthermore there was no copy of the Court order pertaining to Petitioner's application that was forwarded to the Court of Criminal Appeals of Texas; contrary to the Application for Writ of Habeas Corpus Procedure.

3.) On April 1, 2024 Petitioner Rangel received an Official Notice from the Court of Criminal Appeals of Texas bearing Appeal no. WR-95,584-01 and Cause no. 05-CRF-0006-S1-A. Rangel sent a Notification to said Court regarding the incorrect cause number; and a letter requesting a copy of the Court order that was filed by the District Court (see Records). There was no response from the Court of Criminal Appeals of Texas.

4.) On May 1, 2024 Petitioner Rangel received another Official Notice from The Court of Criminal Appeals of Texas stating that his application under cause no. 05-CRF-0006-S1-A has been denied based on the recommendation of The District Court and the independent investigation of The Court of Criminal Appeals of Texas (see Records).

5.) On May 10, 2024 Petitioner Rangel sent a Motion for Reconsideration in regards to his application. Along with said Motion, Petitioner Rangel also enclosed a letter informing The Court of Criminal Appeals of Texas a second time that

There was a mistake in their records since all notices sent from said Court had an incorrect cause no (see Records).

On June 5, 2024 Rangel received an Official Notice from the Court of Criminal Appeals of Texas stating that his Motion for Reconsideration/Rehearing under Cause no. 15-CRF-0006-S1-A has been dismissed (see Records).

6.) On June 14, 2024 Petitioner Rangel wrote The Texas State Law Library asking for a cost estimate of all the documents that the Court of Criminal Appeals of Texas has on record regarding his application. There was no response from the Texas State Law Library.

7.) Rangel's family has called The Texas State Law Library multiple times in order to arrange a payment, on behalf of Rangel, for the release of the documents pertaining to Rangel's application. As of July 26, 2024 The Texas State Law Library has kept delaying the process in which the documents may be acquired by Rangel.

CONCLUSION

Petitioner Rangel asserts that without receiving all the necessary documents that the Court of Criminal Appeals of Texas has on file, he is not able to properly submit a Petition for a writ of Certiorari. Petitioner Rangel and his family are still attempting to purchase said documents from The Texas State Law Library.

Wherefore Petitioner Rangel respectfully requests that this Honorable Court grant him an extension of time for 60

in filing his Petition for a Writ of Certiorari.

Respectfully resubmitted this 17 day of September, 2024

Hugo Rangel

Hugo Rangel-Botello

Petitioner, Pro se

JDCJ # 02258976

Connally Unit

899 FM 632

Kenedy, TX 75119

LIST OF APPENDIXES

A) Official Notice From the Court of Criminal Appeals of Texas Dismissing Motion For Reconsideration/Rehearing

OFFICIAL NOTICE FROM COURT OF CRIMINAL APPEALS OF TEXAS

P.O. BOX 12308, CAPITOL STATION, AUSTIN, TEXAS 78711

STATE OF TEXAS
PENALTY FOR
PRIVATE USE

PRE-SORTED
FIRST CLASS



POSTAGE IN PITNEY BOWES

ZIP 78701 \$ 000.37⁸
02 4W
0000376979 MAY 02 2024

5/1/2024

RANGEL-BOTELLO, HUGO Tr. Ct. No. 05-CRF-0006-S1-A WR-95,584-01

This is to advise that the Court has denied without written order the application for writ of habeas corpus on the findings of the trial court and on the Court's independent review of the record.

Deana Williamson, Clerk

HUGO RANGEL-BOTELLO
CONNALLY UNIT - TDC # 2258976
899 FM 632
KENEDY, TX 78119

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