

OCTOBER TERM, 2024

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IN THE SUPREME COURT OF THE UNITED STATES  
CASE NO. \_\_\_\_\_

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LONDELL BOND,  
Petitioner,  
v.

SUPERINTENDENT, DALLAS SCI,  
Respondent.

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**PETITIONER'S MOTION FOR EXTENSION OF TIME FOR THE FILING OF  
A PETITION FOR WRIT OF CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT**

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Petitioner, LONDELL BOND, through counsel, respectfully moves for an extension of thirty (30) days to prepare and file his Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit. In support thereof, Petitioner submits as follows:

1. Londell Bond is a Pennsylvania prisoner serving a sentence of life imprisonment without parole following his conviction for second degree murder and related charges.
2. The Pennsylvania Superior Court affirmed the conviction in an unreported opinion on February 26, 2008. The Pennsylvania Supreme Court denied a petition for allowance of appeal in an unpublished order in July 2008.
3. Petitioner then sought post-conviction relief. The post-conviction court denied relief and the Pennsylvania Superior Court affirmed in an unreported memorandum opinion. *Commonwealth v. Bond*, 2017 WL 4464382 (2017).

4. Mr. Bond next filed a pro se petition for habeas corpus relief. In October 2018, the Magistrate Judge issued a Report and Recommendation suggesting that the petition be denied and no certificate of appealability issue. Exhibit A. After Petitioner filed timely objections, on November 24, 2020, the District Court issued an Order adopting the Magistrate Judge's Recommendation and denied relief as well as a certificate of appealability, Exhibit B, that was accompanied by a memorandum opinion. Exhibit C.

5. Petitioner filed a timely appeal. On May 24, 2022, the Court of Appeals for the Third Circuit issued an Order granting COA on a single issue of ineffective assistance. Exhibit D.

6. On May 30, 2024, a panel of the Court of Appeals issued a not precedential opinion affirming the denial of habeas relief. Exhibit E. Petitioner's timely petition for rehearing was denied on August 2, 2024. Exhibit F.

7. Pursuant to Rule 13 of the Rules of the Supreme Court of the United States, Mr. Bond may file a writ of certiorari within 90 days of the Third Circuit's order denying rehearing, i.e. by October 31, 2024.

8. Mr. Bond wishes to seek this Court's certiorari review of the issue presented to the Third Circuit. There is jurisdiction in this Court over such a petition under 28 U.S.C. § 1254(1).

9. Undersigned counsel, however, cannot meaningfully prepare a professionally appropriate certiorari petition by the current due date of October 31, 2024. Counsel is a public defender responsible for dozens of capital cases. Counsel's obligations include the filing of a petition for writ of certiorari in a Pennsylvania

capital case that is due on November 18, 2023, a brief in capital cases in the Pennsylvania Supreme Court due on November 13, 2024, and a memorandum of law in a capital case in the District Court for South Dakota due on October 25, 2024. As a result, it is not possible for counsel to adequately prepare the certiorari petition by its current due date.

10. This request for an extension is being filed and served more than ten (10) days in advance of the due date, as provided for in S.C.R. 13(5).

11. This request is made in good faith and is not predicated on an intent to delay. Assistant Philadelphia District Attorney Katherine Ernst, counsel for Respondent, has no objection to this request.

WHEREFORE, Petitioner prays that the Court allow a thirty (30) day extension for the preparation and filing of his Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit.

Respectfully submitted,

/s/ Stuart B. Lev  
Stuart B. Lev  
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Dated: October 17 2024  
Philadelphia, Pennsylvania