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IN THE
SUPREME COURT OF THE UNITED STATES

Thanquarius R. Calhoun,

Petitioner,

v.

Warden, Baldwin State Prison,

Commissioner, Georgia Department of Corrections,

Respondent.

On Petition for Writ of Certiorari to the
United States Court of Appeals for the Eleventh Circuit

**APPLICATION FOR EXTENSION OF TIME
TO FILE PETITION FOR WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS FOR THE ELEVENTH
CIRCUIT**

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Pro Bono Counsel of Record for Petitioner

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

Petitioner Thanquarius R. Calhoun prays for a 60-day extension of time, to and including Friday, October 18, 2024, in which to file a petition for a writ of certiorari. In support of this request, Mr. Calhoun states as follows:

1. On February 15, 2024, the United States Court of Appeals for the Eleventh Circuit affirmed the judgment of the district court in this case denying Mr. Calhoun's application for a writ of habeas corpus under 28 U.S.C. § 2254. (Attachment A.)

2. On April 8, 2024, Mr. Calhoun timely filed a Petition for Rehearing En Banc in the United States Court of Appeals for the Eleventh Circuit.

3. On May 20, 2024, the United States Court of Appeals for the Eleventh Circuit denied Mr. Calhoun's Petition for Rehearing En Banc and denied Mr. Calhoun a rehearing before the panel. (Attachment B.)

4. Mr. Calhoun has ninety days from May 20, 2024 to file a petition for a writ of certiorari. *See* Sup. Ct. R. 13.3. The petition is, therefore, due on August 19, 2024. This application is filed at least ten days before that date.

5. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

6. The undersigned pro bono counsel believes an extension of time is needed to adequately prepare Mr. Calhoun's petition for writ of certiorari. Counsel has been working diligently on other cases and is scheduled to appear for depositions, hearings, and other court-mandated conferences in those matters through the end of

August 2024. Mr. Calhoun's lead counsel is scheduled to appear for depositions in other matters on July 17th, 22nd, 25th, 26th, and 31st and August 6th, days before Mr. Calhoun's Petition for a Writ of Certiorari is due. Mr. Calhoun's remaining counsel of record similarly have conflicting schedules with ongoing litigation matters that require an extension of time so that counsel may adequately prepare Mr. Calhoun's petition for a writ of certiorari.

7. Given their current caseloads, as well as the time the undersigned has spent on this case as counsel of record, no other attorney is prepared to file the petition by its current due date.

* * *

WHEREFORE, Petitioner Thanquarius R. Calhoun respectfully requests that an order be entered extending the time in which to petition for certiorari by sixty days, to and including October 18, 2024.

Respectfully submitted,


/s/ _____

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