

No. _____

In The
Supreme Court of the United States

ROBERT R. TURNER,

Petitioner,

v.

SHARON W. JORDAN, TIEYONE
MITCHELL, BARRY A. BAKER, and
TRACY K. BALDWIN,

Respondents.

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

**APPLICATION TO THE HONORABLE CLARENCE THOMAS FOR
AN EXTENSION OF TIME WITHIN WHICH TO FILE
A PETITION FOR A WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

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

Pursuant to Supreme Court Rule 13.5, Petitioner Robert Turner respectfully requests an extension of time of 60 days to file his Petition for Writ of Certiorari in this Court up to and including February 14, 2025.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *Turner v. Jordan*, 117 F.4th 1289 (11th Cir. Sep. 17, 2024) (attached as Exhibit 1). Petitioner Robert Turner did not seek rehearing before the Eleventh Circuit, meaning a Petition is presently due on December 16, 2024. This application for an extension of time is filed more than ten days before that date.

JURISDICTION

This case arises under the First, Fifth, and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983. This Court has jurisdiction under 28 U.S.C. § 1254(1).

REASONS FOR GRANTING EXTENSION OF TIME

Petitioner's Counsel of Record, Jared Burns, requires extra time to file a Petition in this case due to his workload, which includes representation of many other clients. The Eleventh Circuit appointed Counsel to represent Mr. Turner and Counsel continues to represent Mr. Turner pro bono. Since the Eleventh Circuit issued its opinion, Counsel has filed several motions to dismiss and responses to motions to dismiss in federal and state courts. Counsel also has

multiple cases pending in trial courts in different jurisdictions that require attention, including discovery responsibilities. Moreover, Counsel is a member of the United States Marine Corps Reserve and has scheduled reserve commitments during the week of December 9, 2024—the week leading up to the Petition’s current due date.

No meaningful prejudice would arise from granting the extension. The mandate has already issued and is not stayed.

CONCLUSION

For the foregoing reasons, Petitioner requests that this Court grant an extension of 60 days, up to and including February 14, 2024, within which he may file a petition for writ of certiorari.

DATED: November 12, 2024.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

A copy of this application was served via email and U.S. mail to counsel listed below in accordance with Supreme Court Rules 22.2 and 29.3:

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