

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

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IN THE SUPREME COURT OF THE UNITED STATES

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WILLIAM MICHAEL DENNIS,

Petitioner,

v.

RON BROOMFIELD, Warden,

Respondent.

\_\_\_\_\_

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

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**PETITIONER'S APPLICATION TO EXTEND TIME  
TO FILE PETITION FOR WRIT OF CERTIORARI**

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JAMES S. THOMSON  
Attorney and Counselor at Law  
*Counsel of Record*  
732 Addison Street, Suite A  
Berkeley, California 94710  
Telephone: (510) 525-9123  
james@ycbtal.net

Attorney for Petitioner  
WILLIAM MICHAEL DENNIS

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**To the Honorable Elena Kagan, as Circuit Justice for the United States Court  
of Appeals for the Ninth Circuit:**

Pursuant to this Court's Rules 13.5, 22, 30.2, and 30.3, Petitioner William Michael Dennis respectfully requests that the time to file his Petition for Writ of Certiorari in this matter be extended for 60 days up to and including February 8, 2025. Respondent has no objection to Petitioner’s request.

Petitioner is filing this Application more than ten days before that date. *See* S. Ct. R. 13.5.

The Court of Appeal issued its opinion on May 28, 2024. Appendix A. The Court of Appeal denied rehearing and rehearing en banc on September 11, 2024. Appendix B. Absent an extension of time, the Petition for Writ of Certiorari would be due on December 10, 2024.

This Court has jurisdiction over the judgment under 28 U.S.C. 1254(1).

This is a former capital habeas corpus case brought under 28 U.S.C. § 2254.

This request is made for the following reasons:

1. Due to a variety of circumstances, the Alameda, Los Angeles, and Santa Clara County District Attorneys recalled the sentences in four death penalty cases in which I am counsel of record. They asked the respective superior courts to re-sentence my clients to sentences of less than death. As a result, I had to prepare and file multiple, detailed pleading in these four cases, rather than devote my time to this and other matters.

In three of the cases, my clients were re-sentenced. However, I had to file additional pleadings in those matters in this Court, the United States District Court for the Northern District of California, and in the California Supreme Court and Courts of Appeal. Mr. Dennis was one of those cases. I filed the pleadings in Mr.

Dennis's case on November 14, 2024.

On June 20, 2024, the Santa Clara County District Attorney filed a Petition Requesting Recall of William Michael Dennis' Death Sentence and Hearing to Resentence Defendant to Life Without the Possibility of Parole and Memorandum of Points and Authorities (Penal Code § 1172.1). On September 10, 2024, the Santa Clara County District Attorney filed a Supplement to the Petition. On September 19, 2024, I filed a Response to Petition Requesting Recall of Death Sentence and Resentencing to Life Without the Possibility of Parole.

On October 1, 2024, a hearing on the petition was held. The Court vacated Mr. Dennis's death penalty sentence and re-sentenced him to life without the possibility of parole.

2. Following the re-sentencing, I require additional time to analyze Mr. Dennis's case so that I am able to competently present all relevant record facts and legal authority to this Court in the Petition for Writ of Certiorari.

3. Based on the circumstances recited above and so that I may protect Petitioner's substantial rights, I request an extension of 60 days to file a Petition for Writ of Certiorari to the Supreme Court of California on behalf of Petitioner.

4. The instant Petition for Writ of Certiorari is Mr. Dennis's last opportunity to vindicate his federal constitutional rights within the regular course

of his appeals as they pertain to the guilt phase of his capital trial. A 60-day extension would allow me to properly present Mr. Dennis's case to this Court for review.

For the foregoing reasons, Petitioner respectfully requests a 60-day extension until February 8, 2025 to file his Petition for Writ of Certiorari.

DATED: November 29, 2024

Respectfully submitted,



JAMES S. THOMSON  
Attorney for Petitioner  
WILLIAM MICHAEL DENNIS  
Counsel of Record