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SUPREME COURT OF THE UNITED STATES

BELINDA JONES

Petitioner-Appellant,

SC Case No: _____

v.

Case No: 24-1164

JEREMY HOWARD, Warden

EDM No: 2:22-CV-11237

Respondent-Appellee,

Motion for Extension of Time To File a ‘Petition for a Writ of Certiorari’

NOW COMES Petitioner **Belinda Denise Jones** in Pro Se who respectfully moves this Honorable Court, pursuant to Rule 13(5) and respectfully request this court to allow petitioner an extension of time to file a ‘Petition for a Writ of Certiorari’ for a period not to exceed 30 Days and state as follow:

- 1) **JURISDICTION** – Please review the judgment of the Macomb County Circuit Court denial of Petitioner’s Motion for Relief from Judgment on December 12, 2019. (*See Opinion & Order dated December 12, 2019 attached*) The Eastern District of Michigan denied Petitioner’s Writ of Habeas Corpus on January 31, 2024. (*See Judgment, Opinion & Order dated January 31, 2024 attached*). The Sixth Circuit affirmed the Eastern District denial of petitioner’s Petition and petitioners Petition for rehearing Enbanc on September 23, 2024. (*See attached Opinion & order dated September 23, 2024 attached*) This Court has jurisdiction under 28 U.S.C. § 1254(1). The Sixth Circuit had jurisdiction under 28 U.S.C. § 2253(c). The District court had jurisdiction over the final judgment of the Michigan Supreme Court under 28 U.S.C. § 2254.

- 2) On September 23, 2024 the Sixth Circuit Court of Appeals issued an order denying Petitioner's Certificate of Appealability.
- 3) On Friday September 27, 2024 late evening and after business hours, Petitioner was called to receive legal mail and was then in actual possession of the court's Order and Judgment denying her request for a Certificate of Appealability.
- 4) The date Writ of Certiorari is due, December 23rd is a very special and busiest time of year for most people worldwide – being the holiday season for Christmas, Hanukkah, Chanukah & Kwanzaa, and many other holidays celebrated during this special season.
- 5) There are always many delays and back up of mail, as well as lost mail during the Christmas season. The pleadings must reach the court within that time. – Pursuant to Supreme Court Rule 12 the petition of Certiorari must be filed with the court, prior to the expiration of time.
- 6) Petitioner is an inmate, confined in Women's Huron Valley Correctional Facility and has only limited time and access to legal resources / help, especially with Law Library being closed for Thanksgiving and Christmas holiday, so that additional time is needed.
- 7) It's my understanding the Court is on Holiday break from December 10, 2024 thru January 2025.
- 8) Petitioner is requesting a 30 day extension of time in which to prepare, get copies and file a Writ of Certiorari with this court per Rule 13 (5).
- 9) The issues are complex, worthy of consideration, conflict with prior lower courts decisions and require considerable research.
- 10) This motion is made in the interest of justice and not meant to delay the proceedings.

RELIEF SOUGHT

Wherefore, based on the above, Petitioner, Ms. Belinda Denise Jones humbly requests this Honorable Court to grant a (30) thirty-day extension of time in which to file a Petition for a Writ of Certiorari.

Respectfully submitted,

Belinda Jones

Dated: December 4, 2024

Belinda D. Jones No. 967095
Petitioner in Pro. Se.
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