

No. ____

IN THE

Supreme Court of the United States

OCTOBER TERM 2024

BRYAN FREDERICK JENNINGS,

Petitioner,

v.

SECRETARY,

FLORIDA DEPARTMENT OF CORRECTIONS,

Respondent.

**APPLICATION FOR SIXTY (60) DAY EXTENSION OF TIME IN WHICH TO
FILE PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE ELEVENTH CIRCUIT**

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

COMES NOW the Petitioner, Bryan Frederick Jennings, by and through undersigned counsel and pursuant to Supreme Court Rule 13.5, respectfully requests an extension of time of sixty (60) days within which to file his Petition for Writ of Certiorari to the United States Court of Appeals for the Eleventh Circuit. Petitioner requests that the Court extend the deadline to February 22, 2024. In support of his request, Petitioner, through counsel, states the following:

1. Petitioner is a death-sentenced inmate in the custody of the State of Florida. This case involves an appeal from the decision of the United States Court of

Appeals for the Eleventh Circuit affirming the dismissal of Petitioner's second-in-time petition for writ of habeas corpus brought under 18 U.S.C. § 2254.

2. This Court's jurisdiction rests on 18 U.S.C. § 1254.

3. Petitioner was convicted of murder and sentenced to death in Brevard County, Florida.

4. The Eleventh Circuit denied Petitioner's appeal on July 22, 2024 (Attachment A) and denied Petitioner's timely motion for *en banc* and panel rehearing on September 25, 2024 (Attachment B). Petitioner's time to petition for certiorari in this Court expires December 24, 2024.

5. Petitioner has good cause in support of this request, which is based on counsel's commitment in other cases and matters in the weeks immediately preceding the December 24, 2024, deadline and the complexity of the lengthy record and issues presented in this case. In preparing Petitioner's petition, it became clear to the undersigned that additional time is needed to effectively present Petitioner's arguments. The issues in this petition are factually and legally complex, warranting sixty (60) additional days to prepare.

WHEREFORE, Petitioner, through his undersigned counsel, respectfully requests an extension of time of sixty (60) days within which to file the Petition for Writ of Certiorari to the United States Court of Appeals for the Eleventh Circuit on the above-styled case.

I HEREBY CERTIFY that a true copy of the foregoing motion has been furnished by United States mail, first-class postage prepaid, to all counsel of record on December 6, 2024.

Respectfully submitted,

/s/ Linda McDermott

LINDA McDERMOTT

Counsel of Record

JOHN ABATECOLA

Office of the Federal Public Defender

Northern District of Florida

227 N. Bronough St., Suite 4200

Tallahassee, FL 32301

(850) 942-8818

linda_mcdermott@fd.org

john_abatecola@fd.org

Attorneys for Bryan Frederick Jennings