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BAR ADMISSIONS
TEXAS
FLORIDA
OHIO
PENNSYLVANIA

No. _____

In The Supreme Court of the United States

Miguel Adan Cayetano, Petitioner,

v.

State of Texas, Respondent

**APPLICATION FOR EXTENSION OF TIME TO FILE A
PETITION FOR WRIT OF CERTIORARI TO THE**

TEXAS COURT OF CRIMINAL APPEALS

**To the Honorable Samuel A. Alito, Jr., Associate Justice,
The United States Supreme Court**

PARTIES TO THE PROCEEDING AND RELATED PROCEEDINGS

Defendant, Petitioner Miguel Adan Cayetano, and Plaintiff, Respondent, Attorney General of Texas. The proceedings below were Miguel Adan Cayetano v. State of Texas, 230th District Court Harris County, Texas Trial Court Case No. 1235418, Miguel Adan Cayetano, Appellant v. State of Texas, Appellee, Appeal from Harris County No. 01-23-00463-CR, (First District Court of Appeals), Miguel Adan Cayetano, Appellant v. State of Texas, Petition for Discretionary Review from the First District of Appeals, PD-0707-24 (Texas Court of Criminal Appeals).

JURISDICTION

For good cause shown in an application, a Justice may extend the time to file a petition for a writ of certiorari for a period not exceeding sixty (60) days. Supreme Court Rule 13.5. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1254(1). The constitutional issues are collusion between a District Attorney and a SANE nurse providing *undiscoverable* fraudulent medical evidence to the jury directed to the essential elements of the crime. Their actions violate the United States Constitution 14th Amendment Due Process Clause and the 6th Amendment Right of Confrontation to impeach witnesses.

Pursuant to United States Supreme Court Rules 13.5, 22, 30.3, and 33.2 Petitioner, Miguel Adan Cayetano, is requesting a (45) forty-five-day extension to file a writ of certiorari. On October 9, 2024, the Texas Court of Criminal Appeals ***Refused*** to hear Petitioner's Petition for Discretionary Review. This allowed Petitioner (90) ninety days to file a writ of certiorari with the United States Supreme Court. The deadline is January 7, 2025. If approved by the United States Supreme Court, the new deadline will be February 21, 2025. This Application for Extension of Time is being filed more than (10) ten days before the deadline of January 7, 2025.

The Petitioner is attaching the Texas Court of Criminal Appeals Judgment to ***Refuse*** hearing the Petitioner's Petition for Discretionary Review.

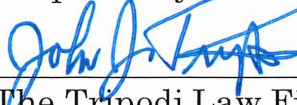
REASONS FOR GRANTING THE APPLICATION

The request for extension of time is because the attorney for the Petitioner resides in Houston, Texas and is the primary caregiver for his 93-year-old father located at an Assisting Living Center in Sarasota, Florida. Under Federal Regulations, the father is placed in Hospice care but reevaluated every (90) ninety days to determine if his health is in decline and will most likely die in (6) six months. If his father's health improves, he is removed from Hospice care. In the past (2) two years the attorney's father has been removed from Hospice care on (4) four separate occasions. The father is currently being removed from Hospice care which requires the Petitioner's attorney to travel to Florida on a more consistent basis because of the shortage of health care providers.

CONCLUSION

For the foregoing reasons, Petitioner-Defendant, Miguel Adan Cayetano, respectfully requests that the application be granted and the deadline to file a writ of certiorari in this matter be extended by (45) forty-five days.

Respectfully submitted,



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December 17, 2024

Certificate of Service

I hereby certify that pursuant to United States Supreme Court Rule 30, this APPLICATION FOR EXTENSION OF TIME TO FILE A PETITION FOR WRIT OF CERTIORARI was sent by Federal Express on December 17, 2024, to the Texas Attorney General at 300 W. 15th Street, Austin, Texas 78701.



The Tripodi Law Firm, P.C.

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Attorney for Respondent

United States Supreme Court Bar ##323614

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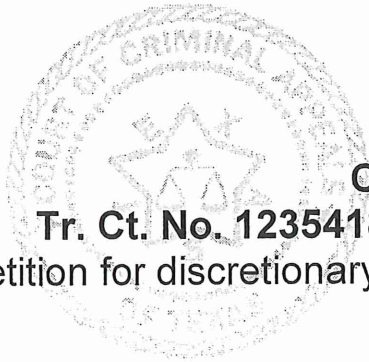
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10/9/2024

CAYETANO, MIGUEL ADAN Tr. Ct. No. 1235418

COA Case No. 01-23-00463-CR

PD-0707-24

On this day, the Appellant's petition for discretionary review has been refused.

Deana Williamson, Clerk

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* DELIVERED VIA E-MAIL *