

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

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IN THE SUPREME COURT OF THE UNITED STATES

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EARL CASPERSON MEGGISON,  
*Petitioner,*

v.

STATE OF FLORIDA,  
*Respondent.*

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ON PETITION FOR WRIT OF CERTIORARI TO THE FLORIDA FIFTH  
DISTRICT COURT APPEAL

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APPLICATION FOR EXTENSION OF TIME TO FILE  
PETITION FOR WRIT OF CERTIORARI

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Counsel for the Petitioner

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

### **Introduction**

Pursuant to this Court's Rule 13.5, the Petitioner, Earl Casperson Meggison, respectfully requests a thirty-day extension of time within which to file a petition for a writ of certiorari in this Court, to and including February 20, 2025.

### **Jurisdiction**

The order of the Florida Fifth District Court of Appeal affirming the denial of the petition was entered on October 22, 2024. Unless extended, the time within which to file a petition for a writ of certiorari would expire on January 21, 2025.

The jurisdiction of this Court is invoked under 28 U.S.C. § 1257(a). A copy of the opinion of the Florida Fifth District Court of Appeal is included in the appendix to this motion.

### **Argument**

The issue in this case is whether it is a violation of constitutional *ex post facto* principles to apply the current version of Florida's registry statute (and its removal provisions) to the Petitioner when more lenient removal provisions were in effect when the Petitioner completed his sentence.

Unfortunately undersigned counsel's schedule requires him to seek an extension of time in this case. In particular, since the Florida Fifth District Court of Appeal entered its order, undersigned counsel has participated/attended: two oral arguments

before a Florida district court of appeal; one sentencing hearing before a Florida circuit court; one motion hearing before a Florida circuit court; two continuing legal education seminars; and three Florida Bar committee meetings.

Additionally, during the next two months, undersigned counsel will be attending an oral argument before a Florida district court and two motion hearings, three postconviction evidentiary hearings, and three sentencing hearing before Florida circuit courts.<sup>1</sup>

Therefore, the Petitioner requests an extension of thirty days to file the petition for a writ of certiorari. No party will be prejudiced by the granting of a thirty-day extension in this case.

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<sup>1</sup> Undersigned counsel will appear at an oral argument on February 11, 2025, in *Castano v. State*, case no. 3D2022-2081, pending in the Florida Third District Court of Appeal. Undersigned counsel will appear at motion hearings on: 1) January 27, 2025, in *State v. Faherty*, case number 2019-CF-993, pending in the Florida Twentieth Judicial Circuit Court (Collier County); and 2) February 25, 2025, in *State v. Johnson*, case number 2020-CF-7891, pending in the Florida Twelfth Judicial Circuit Court (Sarasota County). Undersigned counsel will appear at postconviction evidentiary hearings on: 1) February 12, 2025, in *State v. Pittman*, case number 2015-CF-634, pending in the Florida Fourteenth Judicial Circuit Court (Jackson County); 2) March 18, 2025, in *State v. Cotton*, case number 2004-CF-1151, pending in the Florida Second Judicial Circuit Court (Leon County); 3) March 21, 2025, in *State v. Manley*, case number 2014-CF-16428, pending in the Florida Twentieth Judicial Circuit Court (Lee County). Undersigned counsel will appear at sentencing hearings on: 1) February 3, 2025, in *State v. Parrish*, case number 2016-CF-93, pending in the Florida Second Judicial Circuit Court (Liberty County); 2) February 14, 2025, in *State v. Partridge*, case number 2022-CF-0893, pending in the Fourth Judicial Circuit Court (Duval County); 3) February 21, 2025, in *State v. Coello*, case number 2019-CF-911, pending in the Florida Nineteenth Judicial Circuit Court (St. Lucie County).

Accordingly, the Petitioner respectfully requests that an order be entered extending the time to petition for writ of certiorari by thirty days.

Respectfully submitted,

/s/ Michael Ufferman

MICHAEL UFFERMAN

Counsel for the Petitioner

## CERTIFICATE OF SERVICE

I, Michael Ufferman, a member of the Bar of this Court, hereby certify that on the 10th day of January, 2025, a copy of this Application For Extension of Time To File A Petition For A Writ Of Certiorari in the above-entitled case was mailed, first class postage prepaid, to the Office of the Attorney General, 444 Seabreeze Boulevard, Suite 500, Daytona Beach, Florida 32118 (counsel for the Respondent herein). I further certify that all parties required to be served have been served.

/s/ Michael Ufferman  
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