

IN THE SUPREME COURT OF THE UNITED STATES

JACOB BROWN)
V.)
STATE OF TENNESSEE)

Application for Extension of Time to File Petition for Writ of Certiorari

TO THE HONORABLE JUSTICE BRETT KAVANAUGH:

COMES NOW movant, Jacob Andrew Brown, and hereby moves for a thirty day extension of time to file his petition for writ of certiorari. In support of his request, movant states the following:

1. Movant stands convicted of first degree murder and is serving a sentence of life without parole for an offense that occurred when he was 16 years old.
2. Movant timely filed a motion to reopen his petition for post-conviction relief in the State of Tennessee in light of a change in the law. That motion was denied. Movant timely appealed to the Court of Criminal Appeals and to the Tennessee Supreme Court. Each appeal was unsuccessful. *Jacob Brown v. State of Tennessee*, Case No. W2024-00712-SC-R11-PC (Tenn. Oct. 25, 2024). The decision from the Tennessee Supreme Court denying his application for permission to appeal was entered on October 25, 2024. Movant's petition is therefore due on January 23, 2025.
3. Movant only recently learned that his appeal had been turned down by the Tennessee Supreme Court. By the time Movant learned of the court's ruling and his right to seek review in this Court, he did not have sufficient time to prepare a petition to this Court.
4. Movant is incarcerated and unrepresented by counsel. Movant is also a person without means.
5. Movant seeks an opportunity to present his claim of constitutional relief to this court which squarely presents the question of whether the eighth and fourteenth amendments to the United States constitution require a sentence to be permitted to consider a sentence of less than life imprisonment for a crime committed by a juvenile.

WHEREFORE, Movant respectfully requests a thirty day extension to file his petition for writ of certiorari to this Court.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jacob Andrew Brown". The signature is written in a cursive style with a large initial "J" and "A".

Jacob Andrew Brown

1499 RW Moore Memorial Hwy

Only, TN 37140-5040

IN THE SUPREME COURT OF TENNESSEE
AT JACKSON

FILED
10/25/2024
Clerk of the
Appellate Courts

JACOB BROWN v. STATE OF TENNESSEE

**Circuit Court for Tipton County
No. 6861**

No. W2024-00712-SC-R11-PC

ORDER

Upon consideration of the application for permission to appeal of Jacob Andrew Brown and the record before us, the application is denied.

PER CURIAM