

IN THE
SUPREME COURT OF THE UNITED STATES

No. _____

LECRAM SANDERS
Petitioner-Applicant

v.

UNITED STATES OF AMERICA
Respondent

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

COMES NOW the petitioner, LECRAM SANDERS, by counsel, and, pursuant to Rule 13(5) of the Rules of this Court, respectfully moves this Honorable Court for the entry of an Order granting petitioner an extension of time of 60 days to, and including, Friday, April 25, 2025, for the filing of a Petition for Writ of Certiorari to review the decision of the Supreme Court of Virginia, a state Court of last resort, dated November 26, 2024 (attached hereto as Exhibit 1). This Court has jurisdiction pursuant to 28 U.S.C. §1245(1).

The grounds for this application are as follows:

1. The current deadline for the Petition for Writ of Certiorari is Monday, February 24, 2025;
2. Defense counsel responsible for this Petition has had an unusually heavy professional docket, including a recent week-long state Court murder jury trial that was conducted in a Virginia County Circuit Court at a location approximately two hours from undersigned counsel's office and residence.
3. Defense counsel responsible for this Petition had been immersed in preparations for the murder jury trial, which trial preparations created a significant impact on defense counsel's schedule.
4. Moreover, during preparations for the murder jury trial, defense counsel was out sick with the flu on and off during a three-day period, which further significantly impacted his schedule and set him further behind, especially since counsel was out of the office for a week prior to that on a pre-planned trip.
5. During the week prior to defense counsel's pre-planned trip, defense counsel's office and local Courts also experienced weather-related closings and delays, further impacting defense counsel's schedule.
6. Current weather forecasts predict heavy snowfall in the area during the next few days, which counsel anticipates will lead to Court closures

and/or delays, and, therefore, further disrupt his work schedule in connection with the upcoming February 24 filing deadline.

7. Counsel recognizes that this motion for extension is being filed with the Clerk less than 10 days before the Petition for Certiorari is due.

8. However, counsel respectfully submits that extraordinary circumstances exist, including that, in addition to the aforementioned preparations for a murder jury trial: (1) defense counsel has an extraordinarily heavy Court schedule; (2) he has had to meet various deadlines in connection with both federal and state proceedings; (3) defense counsel has otherwise been engaged in rearranging his schedule to accommodate various legal obligations, especially in light of being out sick; (4) this case requires thorough review to ensure that any issues presented to the Court are meritorious and worthy of certiorari as required by Rule 10; and, (5) this case presents a substantial legal issue.

9. Petitioner has been in custody since June 5, 2015, is currently serving an exceptionally lengthy sentence of 35 years at Virginia's Red Onion State Prison, and an extension of time will in no way delay the service of his sentence or prejudice the Respondent.

10. Defense counsel's office has notified the Commonwealth of this

60-day extension request, and the Commonwealth does not object to the granting of such an extension.

Therefore, for the foregoing reasons, the Petitioner, by counsel, respectfully requests that an extension of time be granted until April 25, 2025 for the Petitioner to file a Petition for Writ of Certiorari, in the interest of justice.

Respectfully submitted,
LECRAM SANDERS

By


Andrew M. Sacks, Esquire

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February, 2025 a true and correct copy of the foregoing was mailed to:

Mason D. Williams, Esquire
Assistant Attorney General
Office of the Attorney General
202 North Ninth Street
Richmond, VA 23219\

Telephone: 804-786-2071
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http://lawfirmofsacksandsacks.com/report/print/01/01/SACKS&SACKS,Shared Documents,IG,SACKS&SACKS,MS&E/andrewsacks/andrewsacks/2.17.2008.doc

VIRGINIA:

EXHIBIT 1

In the Supreme Court of Virginia held at the Supreme Court Building in the City of Richmond on Tuesday the 26th day of November, 2024.

LECRAM OMARI SANDERS,

APPELLANT,

against

Record No. 240185
Court of Appeals No. 0723-22-1

COMMONWEALTH OF VIRGINIA,

APPELLEE.

UPON A PETITION FOR REHEARING

On consideration of the petition of the appellant to set aside the judgment rendered herein on October 18, 2024, and grant a rehearing thereof, the prayer of the said petition is denied.

A Copy,

Teste:

Muriel-Theresa Pitney, Clerk

By:



Deputy Clerk