

**IN THE SUPREME COURT OF THE UNITED STATES**

PAUL K. LACOMBE, )  
 )  
 Petitioner, )  
 )  
 v. ) Case No. \_\_\_\_\_  
 )  
 WARDEN BRIAN EMIG, )  
 JTVCC, *et.al.* )  
 )  
 Respondents. )

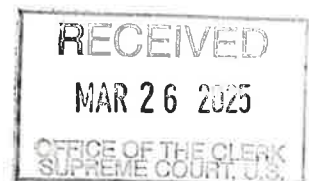
**PETITIONER'S MOTION FOR EXTENSION OF TIME TO FILE A  
PETITION FOR A WRIT OF CERTIORARI**

TO THE HONORABLE CHIEF JUSTICE AND ASSOCIATE JUSTICES OF  
THE SUPREME COURT OF THE UNITED STATES:

COMES NOW, Petitioner Paul K. Lacombe, proceeding *pro se*, respectfully moves this Court pursuant to Rule 13.5 of the *Rules of the Supreme Court of the United States*, for an extension of time of sixty (60) days to file a *Petition for a Writ of Certiorari* to review the judgment of the United States Court of Appeals for the Third Circuit in *Paul Lacombe v. Warden James T. Vaughn Correctional Center, et al.*, No. 24-2961. In support thereof, Petitioner states as follows:

**1. Judgment Below**

On February 21, 2025, the United States Court of Appeals for the Third Circuit denied Petitioner's request for a Certificate of Appealability (COA) in the above-captioned case. The judgment of the Third Circuit is now final.



## **2. Time for Filing a Petition for Certiorari**

Pursuant to *Supreme Court Rule* 13.1, a petition for a writ of certiorari must be filed within ninety (90) days after entry of the judgment below. Accordingly, the deadline for filing the petition is May 22, 2025.

## **3. Grounds for Extension**

Petitioner respectfully requests an extension of time of sixty (60) additional days, up to and including **July 21, 2025**, to file his petition for a writ of certiorari.

This extension is necessary for the following reasons:

a. **Limited access to legal materials and resources.**

As an incarcerated individual, Petitioner faces constraints in accessing legal materials, research tools, and necessary assistance to prepare an adequate and well-reasoned petition.

b. **Need for sufficient time to research and draft the petition.**

Given the complexity of the legal issues involved in his habeas corpus petition, Petitioner requires additional time to present his arguments effectively before this Honorable Court.

c. **Procedural and logistical delays.**

d. The prison law library's restricted hours, combined with the delays associated with mailing legal documents from correctional facilities, present additional challenges that warrant an extension.

#### **4. Conclusion**

For the foregoing reasons, Petitioner respectfully requests that this Court grant an extension of sixty (60) days, up to and including July 21, 2025, to file his *Petition for a Writ of Certiorari*.

Respectfully submitted,

/S/ PAUL K. LACOMBE

Paul K. Lacombe

Petitioner, *Pro Se*

James T. Vaughn Correctional Center

1181 Paddock Rd

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Dated: March 5, 2025