

IN THE SUPREME COURT OF THE UNITED STATES

Thomas I. Miles,
Petitioner,

24A930

U.S. Supreme Court No. _____

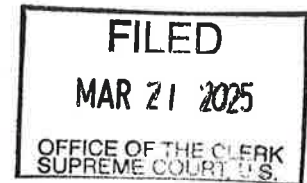
v.

PA Supreme Court No. 316 MAL 2024

The Commonwealth of Pennsylvania,
Respondent

ORIGINAL

MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR A WRIT OF CERTIORARI



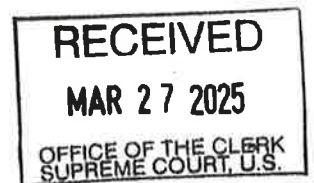
To the Honorable Clerk of the Supreme Court:

Pursuant to Supreme Court **Rule 13.5** and **Rule 30.2**, Petitioner, Thomas I. Miles, acting pro se, respectfully moves for an extension of time to file a petition for a writ of certiorari to review the judgment of the Pennsylvania Supreme Court entered on December 23, 2024¹, Docket No. 316 MAL 2024, with a Docket Number of underlying criminal case of, CR-2885-18.

1. **Original Deadline:** The 90-day period for filing the petition expires on **March 23, 2025**.
2. **Requested Extension:** Petitioner seeks an extension of 60 days, making the new deadline **May 22, 2025**.
3. **Reason for Extension:**
 - a) Petitioner became pro se on January 10, 2024, four days before his incarceration of eight weeks². Given the complexity of this eight-year-old case, Petitioner requests additional

¹ See Exhibit A attached

² See Exhibit B attached, showing a "minimum expiration date", or release date of 3-12-25



time to compile and review the voluminous trial record, and research the filing of this appeal.

- b) The fact that Petitioner was not notified from his appellate attorney that the PA Supreme Court had denied his appeal until 10 days later, and failed to fully explain his options with the U.S. Supreme Court, further delayed Petitioners completion of his appeal.
- c) Being pro se, Petitioners incarceration severely hindered and delayed his ability to prepare his appeal, due to the lack of materials and the access to transcripts and other records needed to prepare his appeal while incarcerated. Without counsel, Petitioner's requests for transcripts and filings to the Court were not completed during his eight-week incarceration.

4. **Consultation with Opposing Counsel:** Petitioner has contacted Respondent's Counsel, to ask for consent to this request, to date petitioner has not received a response, but Petitioner respectfully submits that good cause exists for granting the extension.

Dated: March 21, 2025

Respectfully Submitted,

/s/ Thomas I Miles 

Thomas Miles
Pro Se Petitioner
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EXHIBIT A

**IN THE SUPREME COURT OF PENNSYLVANIA
MIDDLE DISTRICT**

COMMONWEALTH OF PENNSYLVANIA,

Respondent

v.

THOMAS IRWIN MILES,

Petitioner

No. 316 MAL 2024

Petition for Allowance of Appeal
from the Order of the Superior Court

ORDER

PER CURIAM

AND NOW, this 23rd day of December, 2024, the Petition for Allowance of Appeal
is **DENIED**.