

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

2020 APR 30 PM 2:20

US District Court of Vermont
Judge William K. Sessions
P.O. Box 998
Brattleboro, VT 05301

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BY _____
DEPUTY CLERK
March 29, 2020

Philip Zodhiates 18649-084
FCI Ashland
Federal Correctional Institution
P.O. Box 6001
Ashland, KY 41105

In Re; Jenkins v. Miller et al.

CASE NO. 2:12-CV-184

ADDITION OF TIME REQUEST

To the Court;

This letter is to inform the court that the Petitioner Mr. Zodhiates, Response Unlimited Inc., and Victoria Hyden in the above-captioned case, that the Ashland housing facility has been on lockdown status for several weeks due to the COVID-19 Pandemic. Where there is currently no access to the law library, legal research, legal mail department, typing, copies, and all visitation has been suspended, etc. Thereby Petitioner is requesting from this Most Honorable Court a 60-day extension to adequately allow time to secure successor counsel. Where the Supreme Court on March 19, 2020, extended an extra 60 days for all Certiorari filings without a request due to the current crisis. Wherefore businesses, courts, and law firms are closed due to the Pandemic making it difficult in securing counsel. Thereby the reasoning for the request of additional time.

Sincerely and respectfully Submitted,



Philip Zodhiates 18649-084

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

US District Court of Vermont
Hon. William K. Sessions III
P.O. Box 928
Burlington, VT 05402-0928

In Re; Jenkins v. Miller et al.

Philip Zodhiates 18649-084
FCI Ashland
Federal Correctional Institution
P.O. Box 6001
Ashland, KY 41105

CASE NO. 2:12-CV-184

EXPLANATION FOR DELAYED REQUEST FOR ADDITION OF TIME

The petitioner would pray that this Most Honorable Court please excuse the delay in receiving his addition of time request to secure new legal counsel. Indeed, the original time request due to COVID-19 was mailed on March 29, 2020, however, it was sent to the wrong address by mistake (please see attached original submission). The request was returned from Vermont on April 10, 2020, however the return unfortunately took over 10 days to be received. Supplemental proof of the return will be mailed if required. The petitioner apologizes profusely for the mistake in address and the due delay in receiving this request and prays the court take into account the extreme circumstances currently ongoing.