

July 11, 2021

FILED

JUL 14 2021

CLERK OF SUPREME COURT
OF WISCONSIN

Sheila T. Reiff, Clerk
Wisconsin Supreme Court
P.O. Box 1688
Madison, WI 53701

RE: State of Wisconsin v. Dante R. Voss
Appeal No. 2020AP234-CR
L.C. No. 16-CF-72 (Wood Cty.)

Dear Ms. Reiff:

I am writing to request a 90-day extension in which to file my statement of reasons in support of the no-merit petition for review my attorney filed on July 2, 2021. I make this request for two reasons:

- 1) My access to the prison law library is extremely limited. Due to COVID, my prison is still on modified lockdown. As such, my access to the law library is limited to 2-5 45-minute periods, which is not enough time to do meaningful legal research; and
- 2) I am currently applying for a legal loan from prison officials in order to print and mail my response to the Court and the State. From prior experience, it takes approximately a month to obtain approval for a legal loan.

Following are the legal questions I need to research prior to drafting my statement:

- a) Whether the court of appeals can create findings of fact to uphold the trial courts decision?;
- b) Whether the court of appeals abused its discretion when it analyzed the evidence in a light most favorable to the State contrary to well-established law that the evidence must be construed in a light most favorable to the defendant when the decision concerns a jury instruction?;
- c) Whether the court of appeals can ignore a clear holding of long-established precedent and alter that holding ex post facto requiring a defendant to submit additional affirmative evidence not required by the law at the time a defendant's crime was committed?; and
- d) Whether the trial court abused its discretion when it determined the defendant was not entitled to a jury instruction on the defense of involuntary intoxication?

Finally, I respectfully request that I be allowed to file only one (1) copy of my statement supporting the petition for review instead of the statutory ten (10) copies due to my indigency. I will also file one (1) copy with the Criminal Appeals Unit.

Thank you for your attention in this matter.

Sincerely,



Dante Voss

#347294

Oshkosh Corr. Inst.

P.O. Box 3310

Oshkosh, WI 54903

cc: Wood Cty. Clerk of Courts
Criminal Appeals Unit

