
In The
SUPREME COURT OF THE UNITED STATES
October Term 2018

Francisco R. Quintana,
Applicant/Petitioner,

v.

Colorado,
Respondent.

Application for an Extension of Time Within
Which to File a Petition for a Writ of Certiorari to the
Colorado Supreme Court

APPLICATION TO THE HONORABLE JUSTICE
SONIA SOTOMAYOR AS CIRCUIT JUSTICE

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August 22, 2018

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APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Francisco R. Quintana hereby requests a 30-day extension of time within which to file a petition for a writ of certiorari up to and including Wednesday, October 17, 2018.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *Francisco R. Quintana v. Colorado*, No. 17SC730 (Colo. June 18, 2018); the order is attached as Exhibit 1. The Colorado Court of Appeals issued its opinion in *Colorado v. Francisco R. Quintana*, No. 13CA1873 on August 3, 2017; the opinion is attached as Exhibit 2.

JURISDICTION

This Court will have jurisdiction over any timely filed petition for certiorari in this case pursuant to 28 U.S.C. § 1254(1). Under Rules 13.1, 13.3, and 30.1 of the Rules of this Court, a petition for a writ of certiorari was due to be filed on or before September 17, 2018.

REASONS JUSTIFYING AN EXTENSION OF TIME

Applicant respectfully requests a 30-day extension of time within which to file a petition for a writ of certiorari seeking review of the judgment of the Colorado Supreme Court in this case, up to and including October 17, 2018.

1. Applicant has requested that the Northwestern University School of Law Supreme Court Practicum assist in the preparation of his petition. An extension of time will permit the students the time necessary to complete a cogent and well-researched petition.

2. Applicant requests a 30-day extension of time because this period will allow the Northwestern Practicum adequate time to research and complete the

petition after the beginning of the academic calendar for fall 2018, which begins August 27, 2018.

3. The extension of time is also necessary because of the press of other client business. For example, in the coming months, the Northwestern Practicum has several overlapping commitments representing other clients in this Court, including petitions for writs of certiorari in *Kahler v. Kansas* (No. 18-), *Malone v. United States* (18-), and reply briefs in *Rivera-Ruperto v. United States*, (No. 18-5384) and *Dixon v. United States* (17-8853). Mr. Green is also appointed counsel in three D.C. Court of Appeals cases currently briefing and/or preparing for oral argument (*Johnson v. United States*, No. 13-CF-493; *Walker v. United States*, Nos. 14-CF-839 and 14-CF-840; and *General v. United States*, No. 16-CF-0822) and has ongoing litigation in the District Court for the District of Columbia. A 30-day extension for the Applicant would allow Mr. Green the necessary amount of time to effectively contribute to all open matters including Applicant's petition as well as his other client business abroad, and would also allow the Northwestern Practicum students sufficient time for research and drafting efforts per Applicant's request.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests that this Court grant an extension of 30 days, up to and including October 17, 2018, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,

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