

IN THE
SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 2018

No. _____

HINDA OSMAN DHIRANE

PETITIONER,

VS

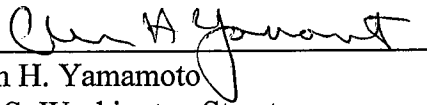
UNITED STATES OF AMERICA,

RESPONDENT.

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

Pursuant to Title 18, United States Code Section 3006A(d)(6) and Rule 39 of this Court, Petitioner **Hinda** Osman Dhirane asks leave to file the attached Application for Extension of Time in Which to File a Petition for a Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit without prepayment of fees or costs and to proceed *in forma pauperis*. Petitioner ~~was~~ represented by counsel appointed pursuant to Title 18, United States Code Section 3006A and F. R. Crim. Proc. 44 in the district court and on appeal to the Fourth Circuit Court of Appeals.

Respectfully submitted,



Alan H. Yamamoto
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Counsel for Petitioner

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To the Honorable John G. Roberts, Jr., Chief Justice of the United States Supreme Court
and Circuit Justice for the Fourth Circuit:

Under 28 U.S.C. § 2101(c) and Rules 13.5, 22 and 30 of this Court, petitioner Hinda Osman Dhirane respectfully requests a 60-day extension of time, up to and including December 13, 2018, in which to file a petition for a writ of certiorari in this Court. The Fourth Circuit entered final judgment against Ms. Dhirane on July 16, 2018. The time to file a petition for a writ of certiorari in this Court expires on October 14, 2018. This application is being filed more than 10 days before that date. A copy of the Fourth Circuit's published opinion in this case is appended to this application. This Court has jurisdiction under 28 U.S.C. § 1254(l).

1. Ms. Dhirane and co-defendant Muna Jama were convicted of multiple counts of providing material support to a foreign terrorist organization in violation of 18 U.S.C. § 2339B. Ms. Dhirane was sentenced to 132 months imprisonment. The district court had jurisdiction over the prosecution pursuant to 18 U.S.C. § 2331.

The United States Court of Appeals for the Fourth Circuit affirmed both defendants' convictions and sentences on July 16, 2018. *United States v. Dhirane and Jama*, 896 F.3d 295 (4th Cir. 2018). Neither Ms. Dhirane nor Ms. Jama sought a rehearing. The court of appeals had jurisdiction over the appeal pursuant to 28 U.S.C. § 1291 and 18 U.S.C. § 3742.

A petition for writ of certiorari is due on October 14, 2018. On September 25, 2018, this Court granted co-defendant Muna Osman Jama's Application for Extension of Time in Which to File a Petition for a Writ of Certiorari, extending the filing date to December 13, 2018. *Muna Osman Jama v. United States*, No. 18A301. This Court had jurisdiction pursuant to 28 U.S.C. § 1254.

2. Counsel has informed Ms. Dhirane of her right to petition this Court for a writ of certiorari and Ms. Dhirane has notified counsel that she wishes to file a petition for a writ of certiorari. After a thorough examination of the court of appeals' opinion, the applicable case law and the considerations for review in Supreme Court Rule 10, counsel believes that there are no compelling reasons for granting a petition for writ of certiorari and it would be frivolous to file. Pursuant to Fourth Circuit procedure, counsel is moving in that court to withdraw from continued representation of Ms. Dhirane for the purpose of filing a petition for writ of certiorari. Counsel seeks a 60 day extension of the filing deadline from October 14, 2018 to December 13, 2018 to allow Ms. Dhirane sufficient time to exercise her right to file a petition.

Wherefore, Ms. Dhirane prays that this application be granted.

Respectfully submitted,



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Dated: September 27, 2018