

No. _____

In The
Supreme Court of the United States

CHRISTOPHER HALL,

Petitioner,

v.

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Respondent.

**APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR A
WRIT OF CERTIORARI TO THE UNITED STATES CIRCUIT COURT OF
APPEALS FOR THE ELEVENTH CIRCUIT**

To the Honorable Justice Clarence Thomas, Associate Justice of the United States Supreme Court and Circuit Justice for the Eleventh Circuit:

Petitioner Christopher Hall requests an extension of time to file his Petition for a Writ of Certiorari. Petitioner requests a forty-five day extension of time from April 4, 2019 to May 20, 2019.¹ The order of the Eleventh Circuit which is being appealed was entered January 4, 2019 and is enclosed. Jurisdiction of this Court to review the order and judgment of the Eleventh Circuit is being invoked pursuant to 28 U.S.C. § 1254(1).

The Petition for a Writ of Certiorari intends to address an important circuit split as to whether appellate courts have jurisdiction to hear questions on issues of law

¹ Pursuant to Supreme Court Rule 30.1, one day was added to this calculation to move the due date from Sunday, May 19, 2019, to the “next day that is not a Saturday, Sunday, federal legal holiday, or day on which the Court building is closed,” namely, Monday, May 20, 2019.

raised in a *pre-verdict* Federal Rule of Civil Procedure 50(a) motion for judgment as a matter of law where no subsequent *post-verdict* Federal Rule of Civil Procedure Rule 50(b) motion has been made in the trial court. The Eleventh Circuit held that it lacks jurisdiction to hear such challenges, while other circuit courts have held otherwise.

Petitioner seeks an extension of time to file his Writ of Certiorari because financial difficulties have precluded him from securing counsel until just prior to the deadline to file the Petition for a Writ of Certiorari (and notably, after the Supreme Court Rule 13.5's 10-day extension window). Petitioner seeks the extension so that his counsel has sufficient time to fully evaluate the merits of his matter and to file his Petition for a Writ of Certiorari.

Respectfully submitted,

/s/ Burton W. Wiand

Burton W. Wiand
WIAND GUERRA KING P.A.
5505 W. Gray Street
Tampa, FL 33609
Telephone: (813) 347-5100
E-Mail: bwiand@wiandlaw.com
Counsel for Petitioner

March 26, 2019

Certificate of Service

I hereby certify that a copy of the foregoing has been filed via overnight delivery service to the Clerk of the Supreme Court as well as via the Supreme Court's electronic filing system. A copy of the foregoing has been served via overnight delivery to:

UNITED STATES SECURITIES AND EXCHANGE COMMISSION
C/O SOLICITOR GENERAL OF THE UNITED STATES
Room 5616
Department of Justice
950 Pennsylvania Ave. N.W.
Washington, DC 20530-0001
Respondent

/s/ Burton W. Wiand

Burton W. Wiand