
In The
SUPREME COURT OF THE UNITED STATES
October Term 2019

Carey Ackies,
Applicant/Petitioner,

v.

United States of America,
Respondent.

Application for an Extension of Time Within
Which to File a Petition for a Writ of Certiorari to the
United States Court of Appeals for the First Circuit

APPLICATION TO THE HONORABLE JUSTICE
STEPHEN BREYER AS CIRCUIT JUSTICE

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August 28, 2019

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APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Carey Ackies, hereby requests a 60-day extension of time within which to file a petition for a writ of certiorari up to and including Monday, November 11, 2019.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *United States v. Carey Ackies*, No. 18-1478 (Mar. 13, 2019) (attached as Exhibit 1). The First Circuit Court of Appeals denied Applicant's petition for rehearing en banc on June 14, 2019 (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 12, 2019. In accordance with Rule 13.5, this application is being filed more than 10 days in advance of the filing date for the petition for a writ of certiorari.

REASONS JUSTIFYING AN EXTENSION OF TIME

Applicant respectfully requests a 60-day extension of time within which to file a petition for a writ of certiorari seeking review of the decision of the First Circuit Court of Appeals in this case, up to and including November 11, 2019.

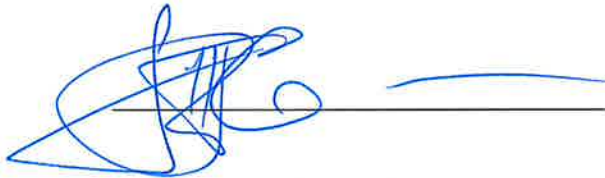
1. Applicant has requested that the Northwestern University School of Law Supreme Court Practicum assist in the preparation of his petition. An extension of time will permit the students the time necessary to complete a cogent and well-researched petition after the beginning of the academic calendar for fall 2019, which begins September 3, 2019.

2. 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 *Clay v. United States*, No. 17-60538 (5th Cir.), due October 6, 2019; *Faircloth v. United States*, No. 19A76, due October 3, 2019; *Vereen v. United States*, No. 19A177, due October 28, 2019; and *Razzaq v. Kansas*, No. 19A9, due September 16, 2019. The Northwestern Practicum also has a reply in support of a petition for writ of certiorari in *Lopez v. Massachusetts*, No. 18-8739, due August 25, 2019; a reply brief on the merits in *Kahler v. Kansas*, No. 18-6135, due August 30, 2019; a brief for petitioner in *Shular v. United States*, No. 18-6662, due on September 25, 2019; and a brief for respondent in *Ritzen Group, Inc. v. Jackson Masonry, LLC*, No. 18-938, due on October 4, 2019. Mr. Green is also appointed counsel in seven D.C. Court of Appeals cases currently briefing and/or preparing for oral argument (*Best v. United States*, No. 12-CF-1590; *Johnson v. United States*, No. 13-CF-493; *General v. United States*, No. 16- CF-0822; *Young v. United States*, No. 18-CF-0694; *Neal v. United States*, No. 17- CF-1346; *Minor v. United States*, No. 18-CF-0686; *Gordon v. United States*, No. 17-CO-0814 & 17-CO-1295), and is appointed counsel in *Sai v. TSA*, No. 14-403, in the District Court for the District of Columbia. A 60-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, 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 60 days, up to and including November 11, 2019, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,



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