

In The  
**SUPREME COURT OF THE UNITED STATES**  
**October Term 2019**

---

Glen B. Clay,  
*Applicant/Petitioner,*  
v.  
United States,  
*Respondent.*

---

**Application for an Extension of Time Within  
Which to File a Petition for a Writ of Certiorari to the  
Court of Appeals for the Fifth Circuit**

---

**APPLICATION TO THE HONORABLE JUSTICE  
SAMUEL A. ALITO AS CIRCUIT JUSTICE**

---

JEFFREY T. GREEN \*  
LINDSAY N. WALTER  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, D.C. 20005  
(202) 736-8000  
jgreen@sidley.com

September 19, 2019

**Attorneys for Applicant/Petitioner**  
**\*Counsel of Record**

## **APPLICATION FOR AN EXTENSION OF TIME**

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Glen B. Clay hereby requests a 60-day extension of time within which to file a petition for a writ of certiorari up to and including Friday, December 6, 2019.

## **JUDGMENT FOR WHICH REVIEW IS SOUGHT**

The judgment for which review is sought is *United States v. Glen B. Clay*, No. 17-60538 (April 25, 2019) (attached as Exhibit 1). The Fifth Circuit Court of Appeals denied Applicant's petition for rehearing en banc on July 8, 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 October 7, 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 Kansas Supreme Court in this case, up to and including December 6, 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. In the coming months, the Northwestern Practicum has several overlapping commitments representing other clients in this Court,

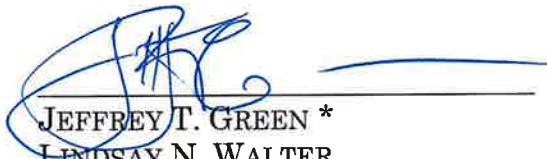
including petitions for writs of certiorari in *Faircloth v. United States*, No. 19A76, due October 3, 2019; *Vereen v. United States*, No. 19A144, due October 28, 2019; and *Ackies v. United States*, due November 11, 2019. The Northwestern Practicum also has a reply brief in support of a petition for writ of certiorari in *Lopez v. Massachusetts*, No. 18-8739, due September 25, 2019; briefs on the merits in *Shular v. United States*, No. 18-6662, due September 25, 2019; and *Ritzen Group, Inc. v. Jackson Masonry, LLC*, No. 18-938, due October 4, 2019.

2. The extension of time is also necessary because of the press of other client business. Mr. Green is also appointed counsel in six D.C. Court of Appeals cases currently briefing and/or preparing for oral argument (*Johnson v. United States*, No. 13-CF-493; *General v. United States*, No. 16-CF-0822; *Minor v. United States*, No. 18-CF-0686; *Young v. United States*, No. 18-CF-0694; *Gordon v. United States*, Nos. 17-CO-814 and 17-CO-1295; and *Neal v. United States*, No. 17-CF-1346) and has ongoing litigation 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 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 60 days, up to and including December 6, 2019, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,



JEFFREY T. GREEN \*  
LINDSAY N. WALTER  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, D.C. 20005  
(202) 736-8000  
jgreen@sidley.com

September 19, 2019

**Attorneys for Applicant/Petitioner**  
\*Counsel of Record