

Case No. 19-

---

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

---

**Savon Germain Carter,**  
*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 Tenth  
Circuit**

---

**APPLICATION TO THE HONORABLE JUSTICE  
SONIA SOTOMAYOR AS CIRCUIT JUSTICE**

Katayoun Azizpour Donnelly  
Member of the Tenth Circuit's CJA  
Appellate Panel  
Azizpour Donnelly LLC  
2373 Central Park Blvd., Suite 100  
(720)675-8584  
Katy@kdonnellylaw.com

September 27, 2019

**Attorney for Applicant/Petitioner**

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

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Savon Germain Carter hereby requests a 60-day extension of time within which to file a petition for a writ of certiorari up to and including Monday, December 9, 2019.

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

The judgment for which review is sought is *United States v. Carter*, No. 18-8014 (July 11, 2019) (attached as Exhibit 1).

### **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 is due to be filed on or before October 9, 2019. In accordance with Rule 13.5, this application is being filed 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 (until December 9, 2019) within which to file a petition for a writ of certiorari seeking review of the decision of the United States Court of Appeals for the Tenth Circuit in this case.

1. The extension of time is necessary because of the press of other client business. Since the issuance of the opinion by the Tenth Circuit on July 11, 2019, the undersigned counsel, among other things, has been responsible for drafting two opening briefs in *People In Interest of A.S.* (Colorado Court of Appeals “COA” – filed on July 23, 2019), and *United States v. Channon* (10th Cir. – filed July 29, 2019); drafting motions in *Edmonds-Radford v. Southwest Airlines* (D. Colo – filed on July 21, 2019); drafting a reply brief *In Re Adoption of K.R.M.* (COA – filed on August 26, 2019); drafting a supplemental brief in *People In Interest of A.S.* (COA – filed on

Aug. 27, 2019); drafting a response to motion for summary judgment in *5411 Leetsdale LLC et al. v. Axlerad et al.* (Denver District Court – filed on Sep. 4, 2019); drafting a petition for writ of certiorari in *People v. Tresco* (Colorado Supreme Court – filed on Sep. 12, 2019); and drafting a reply brief in *Guy v. Whitsitt* (COA – filed Sep. 24, 2019).

2. In the next few weeks, the undersigned counsel, among other things, is responsible for drafting a reply brief in *People In Interest of A.S.* (COA – due on Oct. 1, 2019); drafting an opening brief in *Ralston v. Cannon* (10th Cir. – due on Oct. 3); preparing trial management order, exhibit and witness lists, and proposed jury instruction in *5411 Leetsdale LLC et al. v. Axlerad et al.* (Denver District Court – due Oct. 7, 2019); a 4-day jury trial in *5411 Leetsdale LLC et al. v. Axlerad et al.* (Denver District Court – starting on Nov. 12, 2019); and drafting a reply brief in *United States v. Channon* (10th Cir. – due on Nov. 27, 2019).

3. A 60-day extension for the Applicant would allow the undersigned counsel the time necessary to effectively contribute to all open matters including Applicant's petition as well as her other clients.

## **CONCLUSION**

For the foregoing reasons, Applicant respectfully requests that this Court grant an extension of 60 days, up to and including December 9, 2019, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,

Katayoun A. Donnelly  
Member of the Tenth Circuit's CJA  
Appellate Panel

Azizpour Donnelly LLC  
2373 Central Park Blvd., Suite 100  
(720)675-8584  
Katy@kdonnellylaw.com

September 27, 2019

**Attorney for Applicant/Petitioner**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 27th day of September 2019, a true and correct copy of the foregoing was filed with the Court and served electronically on the following:

Thomas Szott Esq.  
Office of the United States Attorney  
2120 Capitol Avenue  
4th Floor  
PO Box 668  
Cheyenne, WY 82001

*/s/ Katayoun A. Donnelly*  
Katayoun A. Donnelly