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IN THE

SUPREME COURT OF THE UNITED STATES

SHAWNDELL LEE HARRISON,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

On Petition for Writ of Certiorari to the
United States Court of Appeals for the Tenth Circuit

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

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To the Honorable Sonia Sotomayor, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Tenth Circuit:

Petitioner Shawndell Lee Harrison, through undersigned counsel, respectfully requests a 60-day extension of time, up to and including Friday, May 22, 2020, to file a petition for a writ of certiorari. In support of this request, counsel states as follows:

1. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).
2. Mr. Harrison is seeking review of the judgment of the United States Court of Appeals for the Tenth Circuit in case number 17-6119, which was issued on October 22, 2019. Mr. Harrison's petition for rehearing was denied on December 23, 2019. Copies of both orders are attached to this application.
3. Unless extended, the deadline to petition for a writ of certiorari is Monday, March 23, 2020. *See* Sup. Ct. R. 13.3, 30.1. This application is being filed at least ten days before that date.
4. Counsel respectfully requests additional time to prepare Mr. Harrison's petition for writ of certiorari due to work on other matters with deadlines in the Tenth Circuit. Since the Tenth Circuit's decision in this case, undersigned counsel has filed appellate briefs in *United States v. Ansberry*, 19-1048 (reply brief filed January 27, 2020); *United States v. Trujillo*, 19-2057 (reply brief filed January 31, 2020); *United States v. Cain*, 19-7030 (reply brief filed March 3, 2020); and *United States v. Lozano*, 19-1222 (reply brief filed March 5, 2020); and contested the enforceability of an appellate

waiver in *United States v. Perez-Perez*, 19-2154 (response filed January 21, 2020; sur-reply filed February 21, 2020). Counsel, moreover, has forthcoming deadlines in a number of cases, including *United States v. Tignor*, 19-1158 (reply brief due March 17, 2020); *United States v. Cotto*, 19-2182 (opening brief due March 19, 2020); *United States v. Perez-Perez*, 19-2154 (opening brief due April 1, 2020); *United States v. Deluna*, 20-1017 (opening brief due April 6, 2020); and *United States v. Crooks*, 20-1025 (opening brief due April 6, 2020). Counsel must also prepare for oral argument in *United States v. Trujillo*, 19-2057 (oral argument calendared April 30, 2020); *United States v. Ansberry*, 19-1048 (oral argument calendared May 7, 2020); and *United States v. Lozano*, 19-2057 (oral argument calendared May 7, 2020).

For these reasons, Mr. Harrison respectfully requests that an order be entered extending the time in which to petition for certiorari by 60 days, up to and including Friday, May 22, 2020.

Respectfully submitted,

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