

In The
SUPREME COURT OF THE UNITED STATES
October Term 2019

Ernest Vereen, Jr.,
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 Eleventh Circuit**

**APPLICATION TO THE HONORABLE JUSTICE
CLARENCE THOMAS AS CIRCUIT JUSTICE**

CHRISTOPHER A. KERR
13801 WALSINGHAM RD,
#A-154
Largo, FL 33774
(727) 492-2551

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

SARAH O'ROURKE SCHRUP
NORTHWESTERN SUPREME
COURT PRACTICUM
375 East Chicago Avenue
Chicago, IL 60611
(312) 503-0063

August 14, 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 Ernest Vereen, Jr. hereby requests a 60-day extension of time within which to file a petition for a writ of certiorari up to and including Monday, October 28, 2019.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *United States v. Ernest Vereen, Jr.*, No. 17-11147 (April 5, 2019) (attached as Exhibit 1). The Eleventh Circuit Court of Appeals denied Applicant's petition for rehearing en banc on May 31, 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 August 29, 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 Eleventh Circuit Court of Appeals in this case, up to and including October 28, 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 *Ackies v. United States*, No. 18-1478 (1st Cir.), due September 12, 2019; *Beers v. United States*, No. 17-3010 (3d Cir.), due September 18, 2019; *Clay v. United States*, No. 17-60538 (5th Cir.), due October 7, 2019; *Faircloth v. United States*, No. 19A76, due October 3, 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; and a brief for petitioner in *Shular v. United States*, No. 18-6662, due on September 25, 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 October 28, 2019, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,



CHRISTOPHER A. KERR
13801 WALSINGHAM RD,
#A-154
Largo, FL 33774
(727) 492-2551

SARAH O'ROURKE SCHRUP
NORTHWESTERN SUPREME
COURT PRACTICUM
375 East Chicago Avenue
Chicago, IL 60611
(312) 503-0063

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

August 14, 2019

Attorneys for Applicant/Petitioner
*Counsel of Record