

No. __-____

IN THE SUPREME COURT OF THE UNITED STATES

MERSADIES LACHELLE SHELTON, a/k/a, Maisha Love Uhuru,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

**APPLICATION FOR AN EXTENSION OF TIME IN WHICH TO FILE A PETITION FOR
A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR
THE FOURTH CIRCUIT**

To the Honorable John G. Roberts, Jr., Chief Justice of the United States and
Circuit Justice for the Fourth Circuit:

Under 28 U.S.C. § 2101(c) and Rules 13.5, 22, and 30 of this Court, petitioner
Mersadies Shelton respectfully requests a 60-day extension of time, up to and including
December 28, 2019, in which to file a petition for a writ of certiorari in this Court. The
Fourth Circuit entered final judgment against Shelton on July 31, 2019. Shelton's time
to file a petition for certiorari expires on October 29, 2019. This application is being filed
more than ten days before that date. A copy of the Fourth Circuit's published opinion in

this case is attached as Exhibit 1. This Court has jurisdiction under 28 U.S.C. § 1254(1).

On September 23, 2019, the undersigned counsel filed a Certiorari Status Form with the Fourth Circuit stating that counsel will seek to withdraw from representing Ms. Shelton in any petition before this Court. On September 23, 2019, the undersigned counsel filed in the Fourth Circuit a motion to withdraw as counsel. Counsel mailed via U.S. Mail postage pre-paid a copy of the Certiorari Status Form, a copy of the motion to withdraw, and a letter advising Ms. Shelton of all appropriate rights incident thereto, as directed by the Fourth Circuit. On October 9, 2019, the Fourth Circuit granted the undersigned counsel's motion to withdraw. The Federal Correctional Institution in Florida returned the September 23, 2019 mailing to counsel, unopened, stating that it would not receive mailings in envelopes in any color other than white. The correctly labeled mailing envelope was a 10 x 15 manila business grade envelope, appropriately marked as 'special mail', 'legal documents', 'attorney letter', and 'confidential'. Counsel received the returned envelope and contents on October 10, 2019. On October 10, 2019, counsel re-mailed all documents to Ms. Shelton in a white envelope with an explanation to Ms. Shelton. The U.S. Post Office advised that the October 10, 2019 mailing would reach the Federal Correctional Institution on October 15, 2019, fourteen days before the petition for certiorari time period expires.

The requested extension is necessary to avoid prejudice to Ms. Shelton in the event Ms. Shelton decides to file her own certiorari petition or petition this Court for new counsel. For these reasons, Ms. Shelton respectfully requests that an order be entered extending the time to petition for certiorari up to and including December 28, 2019.

Respectfully submitted,

/s/ David A. Eustis

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