

In The  
**SUPREME COURT OF THE UNITED STATES**

**October Term 2019**

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**Marcus Scott Crum,**  
*Applicant/Petitioner,*

v.

**United States,**  
*Respondent.*

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**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 Ninth Circuit**

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**APPLICATION TO THE HONORABLE JUSTICE  
ELENA KAGAN AS CIRCUIT JUSTICE**

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January 15, 2020

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

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Marcus Scott Crum hereby requests a 30-day extension of time within which to file a petition for a writ of certiorari up to and including Wednesday, February 26, 2020, pursuant to Rule 30.1.

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

The judgment for which review is sought is *United States v. Crum*, No. 17-30261 (9th Cir. Aug. 16, 2019). The Ninth Circuit Court of Appeals denied Applicant's petition for panel rehearing and rehearing en banc on October 29, 2019.

### **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 January 27, 2020. 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 30-day extension of time within which to file a petition for a writ of certiorari seeking review of the decision of the Ninth Circuit Court of Appeals in this case, up to and including February 26, 2020.

1. Applicant has requested that the Northwestern University School of Law Supreme Court Practicum assist in the preparation of their petition. An extension of time will permit the students the time necessary to complete a cogent

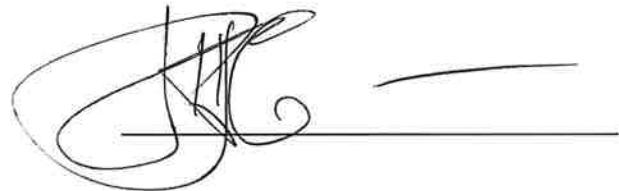
and well-researched petition after the start of the academic calendar for spring 2020, which began January 13, 2020.

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 *Schmitt v. LaRose*, No. 19A518, due February 3, 2020; *Lindsey v. United States*, No. 19A637, due February 15, 2020; and *Ewing v. Nevada*, No. 77670 (Nev. 2019). Additionally, the Northwestern Practicum has reply briefs in support of a petition for writ of certiorari in *Richards v. Donovan*, No. 19-55, due February 5, 2020; *McDonald v. United States*, No. 19-557, due February 5, 2020; *Faircloth v. United States*, No. 19-6249, due January 30, 2020; and *Vereen v. United States*, No. 19-6405, due February 13, 2020. The Northwestern Practicum is also assisting Counsel of Record for *Shular v. United States*, No. 18-6662, in his preparation for oral argument on January 21, 2020.

## CONCLUSION

For the foregoing reasons, Applicant respectfully requests that this Court grant an extension of 30 days, up to and including February 26, 2020, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,



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