

IN THE SUPREME COURT
OF THE UNITED STATES

JON CASCELLA,

Petitioner,

v.

UNITED STATES,

Respondent.

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: No. _____
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PETITIONER’S APPLICATION FOR EXTENSION OF
TIME TO FILE PETITION FOR WRIT OF CERTIORARI
TO THE FIRST CIRCUIT.

To the Hon. Stephen Breyer, Circuit Justice for the First
Circuit:

Petitioner Jon Cascella, through Ines McGillion, Esq.,
appellate counsel appointed under the Criminal Justice Act, 18
U.S.C. § 3006A(d)(6), respectfully moves the Court pursuant to
Supreme Court Rules 13.5, 22, and 30.2 for an extension of 60
days, from February 10, 2020 to April 10, 2020, to file either a
counseled or *pro se* petition for a writ of certiorari to review the
First Circuit’s November 12, 2019 judgment and opinion

(enclosed). The defendant did not file a petition for rehearing.

The Court's jurisdiction is based on 28 U.S.C. § 1257.

The date on which a petition for writ of certiorari would otherwise be due, if not extended, is February 10, 2020.

Petitioner is filing this application well in advance, and thus more than the minimum ten days before that date. See S. Ct. Rule 13.5.

The extension is reasonably necessary to permit Mr. Cascella to research, write, and submit a petition.

Respectfully submitted,

/s/ Ines McGillion

Dated: Jan. 15, 2020

Ines de Crombrugghe McGillion
S. Ct. Bar No. 295917
USCOA No. 1159609

INES MCGILLION LAW OFFICES, PLLC
P.O. Box 212
126 Main Street
Putney, VT 05346
(802) 387-2112
ines@mcgillionlaw.com

CERTIFICATE OF SERVICE

I, Ines de C. McGillion, hereby certify that, on this date and pursuant to Supreme Court Rule 29, I mailed the foregoing Application to effect service upon the following party:

Solicitor General
United States Department of Justice
950 Pennsylvania Ave., N.W.
Washington, DC 20530-0001

Dated: Jan. 15, 2020

/s/ Ines McGillion

Ines de C. McGillion
USCOA No. 1159609

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ines@mcgillionlaw.com

Attorney for Defendant-Appellant