

Case No. 20-

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In The  
**SUPREME COURT OF THE UNITED STATES**  
**January Term 2020**

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**Rocky Hutson,**  
*Applicant/Petitioner,*

v.

**United States**  
**of America,**  
*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 Tenth  
Circuit**

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**APPLICATION TO THE HONORABLE JUSTICE  
SONIA SOTOMAYOR AS CIRCUIT JUSTICE**

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Appellate Panel  
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January 21, 2020

**Attorney for Applicant/Petitioner**

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

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Rocky Hutson hereby requests a 32-day extension of time within which to file a petition for a writ of certiorari up to and including Monday, March 6, 2020.

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

The judgment for which review is sought is *United States v. Hutson*, No. 18-1206 (Nov. 4, 2019) (attached as Exhibit 1).

### **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 is due to be filed on or before February 2, 2020. In accordance with Rule 13.5, this application is being filed 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 32-day extension of time (until March 6, 2020) within which to file a petition for a writ of certiorari seeking review of the decision of the United States Court of Appeals for the Tenth Circuit in this case.

1. The extension of time is necessary because of the press of other client business. Since the issuance of the opinion by the Tenth Circuit on November 4, 2019, the undersigned counsel has, among other things, been responsible for preparing for oral arguments (held on November 14, 2019) and drafting a Rule 59 motion (filed on December 9, 2019) and motion regarding Plaintiffs' request for sanctions (filed on January 3, 2010) in *5411 Leetsdale LLC et al. v. Axelrad et al.* (Denver District Court); two hearings in *People v. Beigi* (Adams and Denver County District Courts, held on November 18 and 19, 2019); drafting a reply brief in *United*

*States v. Channon* (10th Cir. - filed November 20, 2019); oral arguments in *People In Interest of A.S.* (COA - held on December 4, 2019); drafting a petition for writ of certiorari in *In Re United States v. Carter* (SCOTUS, filed December 9, 2019); drafting a reply brief in *Ralston v. Cannon*, (10th Cir. - filed January 7, 2020); and drafting a petition for rehearing in *Adoption of K.R.M.* (COA - filed January 14, 2020).

2. In the next few weeks, the undersigned counsel, among other things, is responsible for drafting a notice of appeal in *5411 Leetsdale LLC et al. v. Axlerad et al.* (COA - due Jan. 30, 2020); a petition for writ of certiorari in *People in Interest of A.S.* (Colorado Supreme Court – due January 30, 2020); a petition for writ of certiorari in *J.H. v. E.R.S.* (SCOTUS – due February 6, 2020); and a petition for writ of certiorari in *Adoption of K.R.M.* (Colorado Supreme Court); and preparing for oral arguments in *United States v. Channon* (10th Cir. – scheduled on March 12, 2020).

3. A 32-day extension for the Applicant would allow the undersigned counsel the time necessary to effectively contribute to all open matters including Applicant's petition as well as her other clients.

## **CONCLUSION**

For the foregoing reasons, Applicant respectfully requests that this Court grant an extension of 32 days, up to and including March 6, 2020, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,

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January 21, 2020

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