

No. 21A-\_\_\_\_

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IN THE  
**Supreme Court of the United States**

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SEUN BANJO OJEDOKUN,

*Applicant,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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

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

1. Under Supreme Court Rules 13.5, 22, and 30, petitioner Seun Banjo Ojedokun, through counsel, respectfully requests a 60-day extension of time, up to and including Friday, April 22, 2022, to file a petition for a writ of certiorari to the United States Court of Appeals for the Fourth Circuit to review *United States v. Ojedokun*, No. 21-4127. The United States Court of Appeals issued its decision on October 26, 2021. Appendix A. The United States Court of Appeals denied rehearing and rehearing en banc on November 23, 2021. Appendix B. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254. The time to file a petition for a writ of certiorari will otherwise expire on February 21, 2022. The application is timely

because it has been filed on or before 10 days before the date on which the petition is otherwise due.

2. The decision of the Fourth Circuit presents important and recurring questions about whether the prohibition in 18 U.S.C. § 1956 (h) of conspiracy to commit money laundering applies extraterritorially to conduct occurring outside of the United States. Several federal circuit courts of appeals are in conflict regarding the standard for when a criminal statute applies extraterritorially, and thus whether they would have decided this case differently from the Fourth Circuit.

3. Good cause exists for this motion. Undersigned counsel, Lawrence D. Rosenberg of Jones Day, directs the West Virginia University College of Law's Supreme Court Litigation Clinic, which is co-counsel in this case. Students in the Clinic were taking final examinations and then on their winter break from December 6, 2021, to January 12, 2022, and have thus just recently been able to begin their work on the petition. That task has been made difficult by circumstances related to the pandemic, including the recent illnesses of some of the students. They require additional time to research the issues presented and to assist in presenting an effective petition for a writ of certiorari.

4. Mr. Rosenberg's ability to complete the petition without an extension has also been made extremely difficult by in-patient surgery that he had on January 19, 2022, which required a substantial hospital stay, and from which he is still recovering.

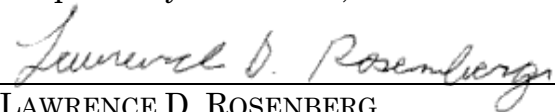
5. Mr. Rosenberg also has had recently, and will have in the coming weeks, significant professional commitments that would also make it extremely difficult to complete the petition without an extension. Mr. Rosenberg is lead counsel in *Citigroup Inc., et al. v. Villar*, No. 2:19-cv-05310-GW (C.D. Cal.), in which he had to file pleadings on December 13, 2021, January 10, 2022, January 27, 2022 and February 9, 2022, in which he had to participate in a hearing on December 16, 2021, January 31, 2022, and February 10, 2022, and in which he has another hearing on February 17, 2022. He is also lead counsel in *United States v. Fallin*, No. 20-7702 (4th Cir.), in which the opening brief and appendix were filed on December 22, 2021, and in which a reply brief will be due on March 4, 2022. He is also lead counsel in *Lufthansa Technik v. Thales Avionics, Inc.*, No. 20-56293 (9th Cir.), in which he had to file a petition for panel rehearing and en banc rehearing on January 10, 2022. Mr. Rosenberg is also lead counsel in *Lufthansa Technik v. Panasonic Avionics Corp.*, No. 2:17-cv-01453-JCC (W.D. Wash.), in which he is coordinating simultaneous document discovery from several parties, and in which he had to conduct a deposition in Seattle, Washington, on December 9, 2021, and in which he will be conducting one or more additional depositions in Seattle, Washington, in late February 2022 and/or March 2022. Mr. Rosenberg is also lead counsel in *Antero Resources Corp. v. Irby*, Nos. 21-0119, 21-1021 (W. Va.), in which he has oral argument in the Supreme Court of Appeals of West Virginia on March 2, 2022, and is lead counsel in *United States v. Wilkerson*, No. 20-6010 (6th Cir.), in which he has oral argument on March 24, 2022. Mr. Rosenberg also is presenting a

program at the American Bar Association Section of Litigation Corporate Counsel Seminar on February 18, 2022, and will thus be out of the office on February 17 and 18, 2022.

WHEREFORE, Mr. Okedojun respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for 60 days, up to and including April 22, 2022.

Dated: February 10, 2022

Respectfully submitted,



LAWRENCE D. ROSENBERG

*Counsel of Record*

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