

IN THE
Supreme Court of the United States

N'NEKA L. CREWS,
Applicant/Petitioner,
v.

STATE OF COLORADO,
Respondent.

APPLICATION FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE
A PETITION FOR A WRIT OF CERTIORARI TO THE
THE COLORADO COURT OF APPEALS

**APPLICATION TO THE HONORABLE JUSTICE
NEIL M. GORSUCH AS CIRCUIT JUSTICE**

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November 24, 2021

APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant N'Neka L. Crews respectfully requests a 60-day extension of time within which to file a petition for a writ of certiorari up to and including Friday, February 4, 2022.

JUDGEMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is the decision of the Colorado Court of Appeals in the case of *Colorado v. Crews*, No. 18CA1357 (Dec. 17, 2020) (attached as Exhibit 1). The Colorado Supreme Court denied certiorari on September 7, 2021 (attached as Exhibit 2).

JURISDICTION

This Court will have jurisdiction over any timely filed petition for certiorari in this case pursuant to 28 U.S.C. §§ 1257. Under Rule 13.1, a petition for writ of certiorari was due to be filed on or before December 6, 2022. In accordance with Rule 13.5, this application is being filed more than 10 days in advance of that date.

REASONS JUSTIFYING AN EXTENSION OF TIME

Applicant respectfully requests a 60-day extension of time within which to file a petition for a writ of certiorari seeking review of the decision of the Colorado Court of Appeals, up to and including Friday, February 4, 2022.

1. Applicant has requested that the William & Mary Law School Appellate and Supreme Court Clinic assist in the preparation of her petition. An extension of time will permit the students the time necessary to complete a cogent and well-researched petition.

2. The Clinic has not been involved in Applicant's case until this stage of the litigation and needs additional time to familiarize itself with the record and legal issues.

3. A 60-day extension would allow the Clinic students to research and complete the petition over their winter break, whereas the current due date would require them to do so just before and during their finals period.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests that this Court grant a 60-day extension of time within which to file a petition for a writ of certiorari seeking review of the decision of the Colorado Court of Appeals, up to and including Friday, February 4, 2022.

Respectfully submitted,

/s Joseph R. Pope

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CERTIFICATE OF SERVICE

The undersigned certifies that on November 24, 2021, a copy of the Petitioner's Motion for Extension were served upon the following:

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