

NO:

IN THE
SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 2021

ANTHONY BELL,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

**APPLICATION FOR AN EXTENSION OF TIME WITHIN
WHICH TO FILE A PETITION FOR A WRIT OF CERTIORARI FROM THE
JUDGMENT OF THE UNITED STATES COURT OF APPEALS FOR THE
ELEVENTH CIRCUIT**

**TO THE HONORABLE CLARENCE THOMAS, ASSOCIATE JUSTICE OF
THE SUPREME COURT OF THE UNITED STATES AND CIRCUIT
JUSTICE FOR THE ELEVENTH CIRCUIT**

Pursuant to Supreme Court Rules 13.5, 22, and 30.3, Anthony Bell respectfully requests a thirty-day extension of time, to and including February 11, 2022, within which to file a petition for a writ of certiorari from the judgment of the United States Court of Appeals for the Eleventh Circuit. Mr. Bell has not previously sought an extension of time from this Court.

Petitioner is filing this Application at least ten days before the filing date, which is January 12, 2022. *See* S.Ct. R. 13.5. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1).

A copy of the Court of Appeals' Opinion in Mr. Bell case is attached as Appendix A hereto.

Undersigned counsel will not have sufficient time to file the petition for writ of certiorari for Mr. Bell by January 12th due to competing case concerns and family matters. Over past 60 days, counsel has filed a petition for writ of certiorari in *Potts v. United States*, No. 21-6007; another petition for writ of certiorari in *Johnson v. United States*, No. 21-6107; and opening briefs with the Eleventh Circuit in *United States v. Williams*, Eleventh Cir. No. 21-12877 and *United States v. Tucker*, Eleventh Cir. No. 21-12071. Counsel is currently working on a third petition for writ of certiorari in *Kadeem Willingham v. United States*, due to be filed January 10th. Counsel's daughter is expecting a baby on December 27th, and counsel will be taking leave in January to help take care of her daughter and the baby.

Accordingly, additional time will be necessary for the careful preparation of the petition for writ of certiorari in Mr. Bell's case.

Mr. Bell is incarcerated serving a term of 324 months imprisonment imposed by the district court. No party will be prejudiced by the granting of a thirty-day extension.

Since the time within which to file a petition for writ of certiorari in this case will expire on January 12, 2022, unless extended, Petitioner respectfully requests

that an order be entered extending his time to file a petition for writ of certiorari by thirty days, to and including February 11, 2022.

Respectfully submitted,

MICHAEL CARUSO
FEDERAL PUBLIC DEFENDER

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December 13, 2021