

In The
SUPREME COURT OF THE UNITED STATES
October Term 2021

Tyrone Wortham,
Applicant/Petitioner,

v.

The People of the State of New York
Respondent.

**Application for an Extension of Time Within
Which to File for a Writ of Certiorari to the Court of Appeals for the State
of New York**

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

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February 10, 2022

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APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Tyrone Wortham hereby requests a 30-day extension of time within which to file a petition for a writ of certiorari up to and including Wednesday, March 23, 2022.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *The People of the State of New York v. Tyrone Wortham*, No. 63 (N.Y. Nov. 23, 2021) (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 was due to be filed on or before February 21, 2022. In accordance with Rule 13.5, this application is being filed more than 10 days in advance of the filing date for the petition for a writ of certiorari.

REASONS JUSTIFYING AN EXTENSION OF TIME

Applicant respectfully request a 30-day extension of time 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 Eighth Circuit in this case, up to and including Wednesday, March 23, 2022.

1. Applicant has requested that the Northwestern University School of Law Supreme Court Practicum assist in the preparation of their petition. An extension of time will permit the students the time necessary to complete a cogent and well-researched petition.

2. Counsel requests a 30-day extension in order to allow the Northwestern Practicum adequate time to research and complete the petition after

the beginning of the academic calendar for spring 2021, which commenced January 14, 2021.

3. The extension of time is also necessary because of the press of other client business. For example, in the coming months, the Northwestern Practicum has several overlapping commitments representing other clients in this Court, including petitions for writs of certiorari in *Hunter v. United States* (No. 22-) and *Chad Thompson, et al., v. United States* (22-), a reply brief in *Nishiie v. United States* (No. 21-6453), and a merits brief on behalf of the respondent in *Golan v. Saada* (No. 20-1034). Mr. Green is also counsel of record for respondent in *Budha Jam et al. v. International Finance Corporation* (No. 21-995), in which a brief in opposition will be filed shortly. Mr. Green is also counsel of record in two D.C. Court of Appeals cases currently briefing and/or preparing for oral argument, *Johnson v. United States*, (No. 13-CF-493), and *Young v. United States*, (No. 18-CF-0694), and has ongoing litigation in the District Court for the District of Columbia, the Delaware District Court, and the Eastern District of Pennsylvania. A 30-day extension for the Applicant would allow Mr. Green the necessary amount of time to effectively contribute to all open matters including Applicant's petition as well as his other client business, and would also allow the Northwestern Practicum students sufficient time for research and drafting efforts per Applicant's request.

4. Attorney Angie Louie needs additional time in which to prepare and draft the Petition for Writ of Certiorari in this matter. Currently, she is the solo or main attorney on three cases in the Appellate Division of the First Judicial Department of the Supreme Court of the State of New York, *People v. Louis Alfonzo* (Ind. No. 4261/07), *People v. Ronald Thompson* (App. No. 2018-03225), and *People v.*

Daquan King (App. No. 2020-00421). Ms. Louie is also a lead counsel on a case in the Second Circuit, *Ross v. Annuci* (No. 21-1291).

CONCLUSION

For the foregoing reasons, Applicant respectfully request that this Court grant an extension of 30 days, up to and including Wednesday, March 23, 2022, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,

/s/ Jeffrey T. Green

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