
In The
SUPREME COURT OF THE UNITED STATES
October Term 2021

Jesse James Sebourn,
Applicant/Petitioner,

v.

California,
Respondent.

Application for an Extension of Time Within
Which to File a Petition for a Writ of Certiorari to the
Supreme Court of the State of California

APPLICATION TO THE HONORABLE JUSTICE
ELENA KAGAN AS CIRCUIT JUSTICE

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Jesse James Sebourn

November 19, 2021

APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of this Court's Rules, Applicant Jesse Sebourn 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 Supreme Court of the State of California in this case, up to and including January 29, 2022.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *California v. Jesse Sebourn*, No. F079872 (June 16, 2021) (attached as Exhibit 1). The Supreme Court of the State of California denied Appellant's Petition for Review on September 1, 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. § 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 November 30, 2021. 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

1. Applicant recently requested that Lillian Hamrick assist in the preparation of his petition. Counsel filed an Application for Admission to Practice Before the Supreme Court on November 15, 2021, and has been informed by the court's admissions office that the application is in order and should be processed by November 29, 2021. An extension of time will permit her the time necessary to complete a cogent and well-researched petition.

2. The extension of time is also necessary because of the press of other client business. In the coming months, counsel must prepare Opening Briefs in the California Court of Appeal in *People v. Dean* (C093782), *People v. Ross* (A163242), *People v. Fauolo* (A162252), and *People v. Pack* (A161564). Counsel must also prepare Reply briefs in *People v. Bridgewater* (C093434) and *People v. Deary-Smith* (C093753) and a Supplemental Brief in *People v. Floyd* (B310389). A 60-day extension for the Applicant would allow Ms. Hamrick the necessary amount of time to effectively contribute to all open matters as well as give her sufficient time for research and drafting efforts per Applicant's request.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests that this Court grant an extension of 60 days, up to and including January 29, 2022, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,

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