

21A417

---

In The  
SUPREME COURT OF THE UNITED STATES  
October Term 2021

---

Nahid Kadir Moshrefi,  
*Petitioner,*

v.

The People of the State of Colorado  
*Respondent.*

---

Application for an Extension of Time Within  
Which to File for a Writ of Certiorari to the United States Court of Appeals  
for State of Colorado.

---

APPLICATION TO THE HONORABLE JUSTICE  
NEIL GORSUCH AS CIRCUIT JUSTICE

---

MEGHAN M. MORRIS  
COLORADO STATE PUBLIC DEFENDER  
APPELLATE DIVISION  
1300 Broadway, Suite 300  
Denver, CO 80203  
(303) 764-1400

JEFFREY T. GREEN\*  
SIDLEY AUSTIN LLP  
JACOB STEINBERG-OTTER  
1501 K STREET N.W.  
Washington, D.C. 20005  
(202) 736-8291  
jgreen@sidley.com

XIAO WANG  
NORTHWESTERN SUPREME COURT  
PRACTICUM  
375 E. Chicago Avenue  
Chicago, IL 60611  
(312) 503-1486

March 10, 2022

*Attorneys for Applicant/Petitioner*

\*Counsel of Record

## **APPLICATION FOR AN EXTENSION OF TIME**

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Nahid Kadir Moshrefi hereby requests an additional 30-day extension of time within which to file a petition for a writ of certiorari up to and including Friday, April 22, 2022.

## **JUDGMENT FOR WHICH REVIEW IS SOUGHT**

The judgment for which review is sought is *The People of the State v. Nahid Kadir Moshrefi* No. 20-2594 (Colo. App. No. 17CA1929). The Colorado Supreme Court denied Applicant's Petition for Certiorari on November 22, 2021.

## **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 Wednesday, March 23, 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 an additional 30-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 in this case, up to and including Friday, March 22, 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 2022, which commenced January 14, 2022. The Northwestern Practicum is not in session from March 19 through March 27.

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 *Henderson v. United States* (No. 21A286), *Hunter v. United States* (No. 21A419), *Wortham v. People of New York* (21A420), and a reply brief in *Nishiie v. United States* (No. 21-6453). 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. An additional 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 Meghan Morris needs additional time in which to prepare and draft the Petition for Writ of Certiorari in this matter. In the coming month,

Ms. Morris has two deadlines in the Colorado Court of Appeals, including a petition for rehearing in *People v. Luong* (No. 19CA2231) and an oral argument in *People v. Martin* (No. 18CA282).

### CONCLUSION

For the foregoing reasons, Applicant respectfully request that this Court grant an additional extension of 30 days, up to and including Friday, April 22, 2022, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,

/s/ Jeffrey T. Green

MEGHAN M. MORRIS  
COLORADO STATE PUBLIC DEFENDER  
APPELLATE DIVISION  
1300 Broadway, Suite 300  
Denver, CO 80203  
(303) 764-1400

XIAO WANG  
NORTHWESTERN SUPREME COURT  
PRACTICUM  
375 E. Chicago Avenue  
Chicago, IL 60611  
(312) 503-1486

JEFFREY T. GREEN\*  
SIDLEY AUSTIN LLP  
JACOB STEINBERG-OTTER  
1501 K STREET N.W.  
Washington, D.C. 20005  
(202) 736-8291  
jgreen@sidley.com

March 10, 2022

*Attorneys for Applicant/Petitioner*

\*Counsel of Record