

In The

SUPREME COURT OF THE UNITED STATES

October Term 2021

Thomas J. Owens,
Applicant/Petitioner,

v.

United States
Respondent.

**Application for an Extension of Time Within
Which to File for a Writ of Certiorari to the United States Court of Appeals
for the Seventh Circuit**

**APPLICATION TO THE HONORABLE JUSTICE
AMY CONEY BARRETT AS CIRCUIT JUSTICE**

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March 23, 2022

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APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Thomas J. Owens hereby requests a 30-day extension of time within which to file a petition for a writ of certiorari up to and including Thursday, May 5, 2022.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *United States v. Thomas Owens* No. 20-3189 (7th Cir. Nov. 19, 2021) (attached as Exhibit 1). The Seventh Circuit Court of Appeals denied Applicant's motion for rehearing or modification on January 5, 2022 (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 April 5, 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 Seventh Circuit in this case, up to and including May 5, 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. Undersigned counsel respectfully submits that additional time is warranted because counsel of record the Northwestern clinic was only recently engaged to prepare the petition. Therefore, undersigned counsel needs additional time to review the record in this case and prepare the petition.

3. The extension of time is also necessary because of counsel's multiple obligations that would make it difficult to complete a petition for certiorari by the current deadline. In the last few weeks, obligations have included oral argument preparatory work in *Golan v. Saada* (No. 20-1034), cert petitions in *Taylor v. Powell* (No. 21-7329) and *Moshrefi v. Colorado* (21-), and a Brief in Opposition in *Jam v. International Finance Corporation* (No. 21-995). Upcoming obligations include petitions for writs of certiorari in *Ronald Hunter v. United States* (No. 21-) and *Tyrone Wortham v. United States* (21-), and a reply brief in *Duane Nishiie v. United States* (No. 21-516). Mr. Green is also appointed counsel 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 abroad.

CONCLUSION

For the foregoing reasons, Applicant respectfully request that this Court grant an extension of 30 days, up to and including May 5, 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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