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NO. 21A566

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IN THE  
**Supreme Court of the United States**

\_\_\_\_\_ TERM, 20\_\_

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Michael Christian Tinlin - Petitioner,

vs.

United States of America - Respondent.

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

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**APPLICATION DIRECTED TO THE HONORABLE JUSTICE  
BRETT KAVANAUGH AS CIRCUIT JUSTICE**

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ATTORNEY FOR PETITIONER

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Comes Now petitioner Michael Christian Tinlin, through his attorney of record, Assistant Federal Public Defender Heather Quick, who, pursuant to Supreme Court Rule 13.5, requests an additional thirty days in which to file a petition in this Court seeking certiorari to the Eighth Circuit Court of Appeals, up through Friday, June 17, 2022. In support, counsel submits as follows:

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

Petitioner seeks an extension to file a petition for writ of certiorari. Petitioner is requesting review of the judgment issued by the Eighth Circuit Court of Appeals on December 15, 2021, affirming the petitioner's conviction and sentence. Petitioner filed a timely motion for petition for rehearing en banc, which the Eighth Circuit denied on January 18, 2022.

### **JURISDICTION**

This Court will have jurisdiction over the timely filed petition pursuant to 28 U.S.C. § 1254(1). Under Supreme Court Rules 13.1, 13.3, and 30.1, the current deadline for the filing of a petition for writ of certiorari is Wednesday, May 18, 2022. Petitioner files this request for additional time at least 10 days before the date the petition is currently due, in compliance with Supreme Court Rule 13.5.

### **REASONS FOR APPLICATION FOR EXTENSION**

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

United States Court of Appeals for the Eighth Circuit in this case, up to and including Friday, June 17, 2022.

Defense counsel has a variety of other obligations before the federal judiciary. For example, in the last thirty days counsel of record has submitted four appellant's briefs and three reply briefs to the Eighth Circuit Court of Appeals and submitted a Petition for Writ of Certiorari to this Court in another matter. In the next thirty days, counsel of record has nine initial briefs, a reply brief and a Petition for Rehearing due to the Eighth Circuit Court of Appeals. These obligations will make it difficult for counsel to finalize and file a satisfactory petition by the current deadline, despite counsel's diligent efforts to do so.

### **CONCLUSION**

For the foregoing reasons, the petitioner respectfully requests that this Court grant a 30-day extension, to and including Friday, June 17, 2022, in which to file a petition for a writ of certiorari.

RESPECTFULLY SUBMITTED,

/s/ Heather Quick  
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