

IN THE SUPREME COURT  
OF THE UNITED STATES

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JOHN CREWS, Jr., :  
: No. \_\_\_\_\_  
*Petitioner*, :  
v. :  
UNITED STATES, :  
: *Respondent*. :  
: \_\_\_\_\_

PETITIONER'S APPLICATION FOR EXTENSION OF  
TIME TO FILE PETITION FOR WRIT OF CERTIORARI  
TO THE SECOND CIRCUIT.

To the Hon. Sonia Sotomayor, Circuit Justice for the Second  
Circuit:

Petitioner John Crews, through Ines McGillion, Esq.,  
appellate counsel appointed under the Criminal Justice Act, 18  
U.S.C. § 3006A(d)(6), respectfully moves the Court pursuant to  
Supreme Court Rules 13.5, 22, and 30.2 for an extension of 60  
days, from June 13, 2022 to August 12, 2022, to file a *pro se*  
petition for a writ of certiorari to review the Second Circuit's  
March 15, 2022 Summary Order dismissing his appeal (enclosed).

The defendant did not file a petition for rehearing. The Court's jurisdiction is based on 28 U.S.C. § 1257.

The date on which a petition for writ of certiorari would otherwise be due, if not extended, is June 13, 2022. Petitioner is filing this today, eleven days before that date. See S. Ct. Rule 13.5. The extension is reasonably necessary to permit Mr. Crews to research, write, and submit a petition.

Respectfully submitted,

/s/ Ines McGillion

Dated: June 3, 2022

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Ines de Crombrugghe McGillion  
S. Ct. Bar No. 295917  
USCOA No. 1159609

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CERTIFICATE OF SERVICE

I, Ines McGillion, hereby certify that, on this date and pursuant to Supreme Court Rule 29, I mailed the foregoing Application to effect service upon the following party:

Solicitor General  
United States Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, DC 20530-0001

/s/ Ines McGillion

Dated: June 3, 2022

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Ines de C. McGillion

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