

21A725

In The
SUPREME COURT OF THE UNITED STATES
October Term 2021

Travis Amaral,
Applicant,

v.

Charles Ryan, et al.,
Respondents.

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

APPLICATION TO THE HONORABLE JUSTICE
ELENA KAGAN AS CIRCUIT JUSTICE

COLLIN P. WEDEL
NICOLE M. BAADE
SIDLEY AUSTIN LLP
555 WEST FIFTH STREET, STE. 4000
Los Angeles, CA 90013

THOMAS J. PHALEN
THOMAS J. PHALEN ATTORNEY AT LAW
P.O. Box 25053
Phoenix, AZ 85002-50553

JEFFREY T. GREEN*
JOSHUA F. FOUGERE
SIDLEY AUSTIN LLP
1501 K STREET NW
Washington, D.C. 20005
(202) 736-8291
jgreen@sidley.com

XIAO WANG
NORTHWESTERN SUPREME COURT
PRACTICUM
375 E. Chicago Avenue
Chicago, IL 60611

June 2, 2022

Attorneys for Applicant

*Counsel of Record

APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Travis Amaral hereby requests an additional 30-day extension of time within which to file a petition for a writ of certiorari up to and including Monday, July 25, 2022.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *Travis Amaral v. Charles Ryan, et al.*, No. 19-15003 (9th Cir. Dec. 16, 2021). The Ninth Circuit Court of Appeals denied Applicant's motion for rehearing or modification on February 24, 2022.

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 June 24, 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 requests 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 Ninth Circuit in this case, up to and including Monday, July 25, 2022.

1. Applicant has requested that the Northwestern University School of Law Supreme Court Practicum assist in the preparation of his petition. An extension of time will allow the practicum to complete a cogent and well-researched petition.

2. Counsel requests an additional 30-day extension in order to allow the Northwestern Practicum adequate time to research and complete the petition. The Practicum's regular semester has ended and now proceeds with a much reduced number of participants in the late spring and summer.

3. The additional extension of time is also necessary because of the press of other client business. In the coming months, the Northwestern Practicum has several overlapping commitments representing other clients in this Court, including petitions for writs of certiorari in *Miclaus v. United States* (21A529) and *McGill v. Shinn* (21A672); and a reply brief in *Wortham v. United States* (21-7703). Mr. Green is counsel of record in three D.C. Court of Appeals cases currently briefing and/or preparing for oral argument, *Johnson v. United States*, (No. 13-CF-493), *Minor v. United States*, (No. 18-CF-0686), and *Neal v. United States* (No. 17-CF-1346), 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.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests that this Court grant an additional extension of 30 days, up to and including Monday, July 25, 2022, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,

/s/ Jeffrey T. Green

COLLIN P. WEDEL
NICOLE M. BAADE
SIDLEY AUSTIN LLP
555 WEST FIFTH STREET, STE. 4000
Los Angeles, CA 90013

THOMAS J. PHALEN
THOMAS J. PHALEN ATTORNEY AT LAW
P.O. BOX 25053
Phoenix, AZ 85002-50553

JEFFREY T. GREEN*
JOSHUA F. FOUGERE
SIDLEY AUSTIN LLP
1501 K STREET NW
Washington, D.C. 20005
(202) 736-8291
jgreen@sidley.com

XIAO WANG
NORTHWESTERN SUPREME COURT
PRACTICUM
375 E. Chicago Avenue
Chicago, IL 60611

June 2, 2022

Attorneys for Applicant

*Counsel of Record