
**CASE NO. _____ (CAPITAL CASE)
IN THE SUPREME COURT OF THE UNITED STATES**

RICHARD ALLEN JACKSON,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

**APPLICATION FOR EXTENSION OF TIME
TO FILE PETITION FOR WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT**

Petitioner, Richard Allen Jackson, through undersigned counsel, respectfully moves for an extension of forty-six (46) days to prepare and file his Petition for Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit. In support of this request, Petitioner respectfully submits:

1. Petitioner, through undersigned counsel, wishes to file a Petition for Writ of Certiorari to seek this Court's review of the Fourth Circuit's April 20, 2022, opinion denying Jackson's petition for habeas corpus relief. A timely petition for rehearing en banc was denied on June 17, 2022. A copy of the April 20, 2022, opinion and June 17, 2022, order denying rehearing en banc are attached.

2. Petitioner's certiorari petition is currently due on September 15, 2022. *See* Sup. Ct. R. 13.3 (time for filing petition for writ of certiorari runs from the date of the denial of

rehearing). In accordance with this Court's rules, this request is made at least ten (10) days in advance of the current due date. *See* Sup. Ct. R. 13.5.

3. Petitioner's capital case presents complex and important constitutional issues involving the application of this Court's decision in *Johnson v. United States*, 576 U.S. 591 (2015), and its progeny to the crime of federal first-degree murder. *See* 18 U.S.C. § 1111(a). Moreover, Petitioner requests additional time to file in light of counsel's heavy workload. Counsel is a member of a defender services office responsible for numerous capital cases that have competing deadlines in various federal and state courts in the upcoming weeks.

4. Under these circumstances, the undersigned respectfully requests that the Court grant this Motion and extend the time in which to file the Petition for Writ of Certiorari by forty-six (46) days, until October 31, 2022.

5. The granting of this request shall cause no prejudice to the Government.

6. This request is made in good faith and is not predicated on an intent to delay the resolution of this litigation.

WHEREFORE, Petitioner prays that the Court allow a forty-six (46) day extension for the preparation and filing of this Petition for Writ of Certiorari.

Respectfully submitted,

/s/ Stuart Lev

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Dated: September 1, 2022

CERTIFICATE OF SERVICE

I, Stuart Lev, hereby certify that on this date I served the foregoing upon the following persons by first class mail, postage prepaid:

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Dated: September 1, 2022