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IN THE SUPREME COURT OF THE UNITED STATES

No. _____

ORLANDO HOBBS,

Applicant,

v.

CLINTON BRYANT,

Respondent.

APPLICATION TO THE HONORABLE BRETT KAVANAUGH
FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE
A PETITION FOR A WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

Pursuant to Supreme Court Rule 13(5), Orlando Hobbs, hereby
moves for an extension of time of 25 days, to and including
March 10, 2022, for the filing of a petition for a writ of
certiorari. Unless an extension is granted, the deadline for
filing the petition for certiorari will be February 15, 2022.

In support of this request, Applicant states as follows:

1. From a 28 U.S.C. Section 2241(1)(a), (2), the United States Court of Appeals for the Sixth Circuit, No. 21-5267, rendered

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its decision contrary to clearly established state and federal laws on November 15, 2021, and timely rehearing denied. This Court has jurisdiction under 28 U.S.C. Section 1254(1).

2. This case involves an extraordinary and unprecedented statutory due process violation under 18 U.S.C. Section 921(a) (20) and Minnesota, Restoration of Rights, Minn. Stat. 608.165 (1) (a), (Exhibit, Exh. "1") in which all his civil rights were restored by the State that took them after completion of more than ten-years, mncourts.gov "firearm, 10 years, permanently removed by order of court." of no violations of state and or federal law.

3. Having exhausted all administrative, judicial remedies, including 28 U.S.C. Section 2255(1), 28 U.S.C. Section 2241, BP-8-11 with the Federal Bureau of Prisons, and its Attorney General officers litigation teams.

4. First, in plain contravention of the statutory text and settled canons of interpretation, the panel construed 18 U.S.C. Section[s] 921(a)(20), 922(g)(1), and 924(e)(1) to reach interactions involving the statutes on its face applies only to existing felony convictions, not convictions which were restored by the States' Constitutions and its Statutes, actions that Congress never intended to criminalized.

5. Second, the panel with the clear teachings of this Court's enforcement, statutory entitlements, **concluded that the United States did not have the burden of proving state convictions and federal firearm offense and subsequent violations, and for sentence enhancements, under 18 U.S.C. Section 924(e) (1)** but "**{a} defendant has the burden of proven the case.**"

6. This applicant contends, his research is this position is unprecedented, and contends that, and argues that, section 921(a) [(20)] is a preventive clause, requiring the United States to ensure that any prior conviction before there can be an arrest for a federal firearm violation, the United States must prove a lawful existing conviction, for more than one year, for purposes of 18 U.S.C. Section 922(g)(1). "Under the straight-forward text" Hobbs's prior Minnesota felony convictions cannot serve as predicates for his felon-in-possession charge under § 922(g) or for his sentence as an armed career criminal under § 924(e), he will present as well.

7. Applicant thus requests a modest extension for this pro se applicant to consult for concluding assistance, who was incarcerated and not proficient in combined state and federal laws, and to prepare a petition that fully addresses the complex issues raised by the decision below and frames those issues in a manner that will be most helpful to the Court.

WHEREFORE, for the foregoing reasons, Applicant requests that an extension of time to and including February 15, 2022, be granted within which Applicant may file a petition for a writ of certiorari before this respective Court.

Date: January 24, 2022.


Respectfully submitted,

Orlando Dean Hobbs
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