

No. A-_____

In the Supreme Court of the United States

Jackie Jackson,

Petitioner,

v.

Ohio

Respondent.

**Application for an Extension of Time to File a Petition for a
Writ of Certiorari to the Ohio Supreme Court**

To the Honorable Brett M. Kavanaugh, Associate Justice of the United States and Circuit Justice for the Sixth Circuit:

Pursuant to Rule 13.5 of this Court, Jackie Jackson respectfully requests a 30-day extension of time, to and including April 7, 2023, in which to file a petition for a writ of certiorari in this Court. The Court has jurisdiction under 28 U.S.C. § 1257.

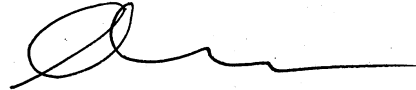
The judgment of the Ohio Supreme Court was entered on December 8, 2022, so the time to file a petition for a writ of certiorari currently expires on March 8, 2023. A copy of the Ohio Supreme Court's decision is attached.

In the decision below, a divided Ohio Supreme Court erroneously held that no "search" takes place under the Fourth Amendment where one police officer opens the door of a car and another officer looks inside the car for contraband. This holding is impossible to square with the ordinary meaning of the word "search," both now and at the Founding. And it invites the police to divide responsibility among two or more officers to shield their searches from constitutional scrutiny.

Good cause exists for an extension of time to prepare a certiorari petition in this case. Undersigned counsel of record was not involved in this case in the lower courts. Counsel needs time to familiarize himself with the full record and to conduct the research necessary for the preparation of the certiorari petition.

For these reasons, we request a 30-day extension of time, to and including April 7, 2023, in which to file a petition for a writ of certiorari.

Respectfully submitted,



Stuart Banner
Counsel of Record
UCLA School of Law
Supreme Court Clinic
405 Hilgard Ave.
Los Angeles, CA 90095
(310) 206-8506
banner@law.ucla.edu

January 23, 2023