

**IN THE SUPREME COURT OF THE UNITED STATES**

**TYREE STEELE,** :  
**Petitioner**

**VS.** : **No.** \_\_\_\_\_

**UNITED STATES OF AMERICA :**

**APPLICATION FOR EXTENSION OF TIME  
FOR FILING PETITION FOR WRIT OF CERTIORARI**

Keith M. Donoghue, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, respectfully requests the granting of the instant application for a 30-day extension of time, or until July 21, 2023, for filing a petition for writ of certiorari on behalf of Tyree Steele, and in support states:

1. Tyree Steele pleaded guilty to a single count of unarmed bank robbery in violation of 18 U.S.C. § 2113(a). He was sentenced on March 2, 2022, to 120 months of imprisonment to be followed by three years of supervised release, and noticed a timely appeal.

2. The matter was fully briefed before the Third Circuit Court of Appeals. On March 23, 2023, the court of appeals affirmed the judgment of the district court and issued a non-precedential opinion submitted herewith as Appendix A.

3. Pursuant to Rule 13.1, Mr. Steele's petition for writ of certiorari is presently due on June 21, 2023.

4. Counsel respectfully requests an extension of time as he has been occupied with numerous other matters, including *United States v. Justyn Perez-Colon*, Third Circuit No. 21-2802, petition for rehearing filed June 5, 2023; *United States v. Kareem Murphy*, Third Circuit No. 19-1653, supplemental reply brief filed May 24, 2023, *United States v. Garnet Small*, Third Circuit No. 22-1469, oral argument presented May 16, 2023; *Stacy Gallman v. United States*, No. 22-7539, petition for certiorari filed May 9, 2023; *United States v. Matthew Packer*, Third Circuit No. 22-2554, reply brief filed May 4, 2023; *United States v. Lawrence Bush*, Third Circuit No. 22-2629, reply brief filed May 3, 2023. Counsel also remains occupied with briefing in the matters of *United States v. Stephen Corona*, Third Circuit No. 23-1472, opening brief and joint appendix presently due June 15, 2023; *United States v. Marquise Latimer*, Third Circuit No. 23-1131, opening brief and joint appendix presently due June 16, 2023; and *United States v. Jonathan Goerig*, Third Circuit No. 23-1582, opening brief and joint appendix presently due June 30, 2023.

5. Counsel requests an additional thirty (30) days, or until July 21, 2023, in which to complete the petition for writ of certiorari.

**WHEREFORE**, for all the foregoing reasons of good cause, Keith M. Donoghue, Assistant Federal Defender, on behalf of the Federal Community Defender Office for the Eastern District of Pennsylvania, and on behalf of Tyree Steele, respectfully requests that this Court grant this application for a 30-day extension of time for filing of a petition for writ of certiorari, and order that the petition be filed on or before July 21, 2023.

Respectfully submitted,

/s/ Keith M. Donoghue

KEITH M. DONOGHUE  
Assistant Federal Defender

**CERTIFICATE OF SERVICE**

I, Keith M. Donoghue, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that I have served a copy of the *Application for Extension of Time for Filing Petition for Writ of Certiorari* upon Assistant United States Attorney Joseph A. LaBar, by first class U.S. mail, postage prepaid, to his office located at the United States Attorney's Office, 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106, and upon the Office of the Solicitor General, by first class U.S. mail, postage prepaid at Department of Justice, Room 5614, 950 Pennsylvania Avenue, N.W., Washington, D.C. 20530-0001.

/s/ Keith M. Donoghue  
KEITH M. DONOGHUE  
Assistant Federal Defender

Date: June 8, 2023