

NO.  
IN THE  
SUPREME COURT OF THE UNITED STATES

OCTOBER TERM 2021

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JOSEPH ISAIAH WOODSON, JR.,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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APPLICATION FOR 60-DAY EXTENSION OF TIME  
IN WHICH TO FILE A PETITION FOR A WRIT OF CERTIORARI

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To the Honorable Clarence Thomas, as Circuit Justice for the United States Court of Appeals for the Eleventh Circuit:

Pursuant to Rule 13.5 of the Rules of the Supreme Court of the United States, Petitioner, Mr. Joseph Isaiah Woodson, Jr., respectfully requests that the time to file a Petition for a Writ of Certiorari in this case be extended for sixty days to and including November 7, 2022.

**Basis for Jurisdiction**

The United States District Court for the Southern District of Florida had original jurisdiction over this criminal action pursuant to 18 U.S.C. § 3231. An appeal from that court's final judgment proceeded for review by the United States Court of

Appeals for the Eleventh Circuit, in accordance with 18 U.S.C. § 3742 and 28 U.S.C. § 1291. The decision of the Eleventh Circuit issued on April 13, 2022. Petitioner filed a motion for rehearing en banc. The Eleventh Circuit Court of Appeals denied the petition for rehearing en banc on June 8, 2022. Absent an extension of time, the Petition for a Writ of Certiorari in this case is currently due on September 6, 2022. Petitioner is filing this Application more than ten days prior to that date in accordance with S. Ct. Rule 13.5. This Honorable Court's certiorari jurisdiction is invoked pursuant to 28 U.S.C. § 1254(1).

### **Judgment to be Reviewed**

On April 13, 2022, the Eleventh Circuit affirmed the petitioner's convictions in a published opinion. *See United States v. Woodson*, 30 F.4th 1295 (11th Cir. April 13, 2022). A copy of the Eleventh Circuit's opinion is attached as Appendix A. The Court of Appeals denied the petition for rehearing en banc on June 8, 2022. A copy of the Eleventh Circuit's Order is attached hereto as Appendix B.

### **Reasons for Granting an Extension of Time**

Undersigned counsel has been working on several substantive appeals in the United States Court of Appeals for the Eleventh Circuit. On July 15, 2022, undersigned counsel filed appellant's initial brief in *United States v. Curtin*, appeal no. 22-10509 (11th Cir.). Undersigned counsel is currently working on the initial brief in *United States v. Moncrieffe*, appeal no. 22-10351 (11th Cir.), which is due on August 31, 2022. Those facts support a finding of good cause pursuant to S. Ct. R. 13.5.

Wherefore, undersigned counsel respectfully asks this Honorable Court to grant a 60-day extension of time in which to file a Petition for a Writ of Certiorari.

Respectfully Submitted.

MICHAEL CARUSO  
Federal Public Defender

Ft. Lauderdale, Florida  
August 10, 2022

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