

IN THE UNITED STATES SUPREME COURT

KEN HARVELL,
Petitioner,

v.

Case No.

UNITED STATES OF AMERICA.
Respondent.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PETITION
FOR CERTIORARI**

COMES NOW, Ken Harvell, through counsel, hereby moves this Court for an Order granting an extension of time to file the Petition for Certiorari in this case for approximately 45 days, or September 26, 2022. As grounds,

1. Appellant conferred with Marissa Miller, AUSA, who does not object to the relief requested.
2. The Tenth Circuit Court of Appeals denied a petition for rehearing in case number 20-1245 on May 11, 2022.
3. Counsel for Petitioner is a sole proprietor. Counsel has been very busy as courts have returned to more customary dockets following the Covid Pandemic. Specifically, counsel has been preparing appellate briefs in *People v. Brown*, 22CA238 (Colo. App.) & *Gallegos v. City of Wheatridge*, 20CA2153 (Colo. App.); and extensive post-conviction proceedings in *People v. Powell*, 18CR36 Clear Creek County District Court, as well as trial proceedings in *In the Matter of: Joseph T Gallegos*,

2020PR420 (Denver probate), and People v. Marquez, 20CR948 & 20CR928 & 1046 (Boulder Colo. district court).

4. Wherefore, Petitioner respectfully requests thirty days or until September 11, 2022 to complete the Petition

Respectfully submitted,
s/Jonathan S. Willett
Attorney for Defendant
255 Canyon Boulevard, Suite 100
Boulder, Colorado 80302
Telephone: (303) 832-5648
Facsimile: (303) 832-7813
jwillett@willettlaw.net

Certificate of Service

I hereby certify that the foregoing Pleading was served electronically by email to system on August 8, 2022 to:

Marissa.miller@usdoj.gov
Office of the U.S. Attorney
1801 California Street
Suite 1600
Denver, CO 80202

s/ Jonathan S. Willett