

No. 22-A-__

IN THE SUPREME COURT OF THE UNITED STATES
October term 2021

RONALD MICKEL,

Petitioner

v.

UNITED STATES OF AMERICA,

Respondent.

**Application for Extension of Time Within Which to File for a Writ of
Certiorari to the Court of Appeals for the Sixth Circuit**

**APPLICATION FOR EXTENSION OF TIME TO
FILE A PETITION FOR A WRIT OF CERTIORARI**

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APPLICATION FOR AN EXTENSION OF TIME

Petitioner Ronald Mickel was convicted by jury of being a felon in possession of ammunition, in violation of 18 U.S.C. § 922(g)(1). At sentencing, the district court found he qualified under the Armed Career Criminal Act, and Mr. Mickel received a sentence of 188 months of imprisonment. Petitioner filed a direct appeal to the Sixth Circuit Court of Appeals, which affirmed his sentence. *United States v. Mickel*, 2022 WL 1100459 (6th Cir. April 13, 2022) (attached as Exhibit A).

Pursuant to Supreme Court Rules 13.5, 22, and 30, Petitioner respectfully requests a 60-day extension of time, up to and including September 14, 2022, to file a petition for a writ of certiorari to the United States Court of Appeals for the Sixth Circuit to review that court's decision in *United States v. Mickel*, 2022 WL 1100459 (6th Cir. April 13, 2022).

JURISDICTION

The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1), and the time to file a petition for a writ of certiorari will expire without an extension on July 12, 2022. This application is timely because it has been filed more than 10 days prior to the date on which the time for filing the petition is to expire.

REASONS JUSTIFYING AN EXTENSION OF TIME

Counsel for Mr. Mickel is an Assistant Federal Public Defender with the Federal Public Defender's Office for the Northern District of Ohio with a significant case load of pending trial court and appellate court matters. Currently, counsel does not have an adequate amount of time to prepare an effective petition for writ of

certiorari on behalf of Mr. Mickel. A one-time extension of 60 days will allow counsel to prepare an effective petition.

CONCLUSION

Accordingly, the petitioner respectfully requests an order be entered extending the time to file a petition for a writ of certiorari for 60 days, up to and including September 14, 2022.

Dated: June 28, 2022

Respectfully submitted,

STEPHEN NEWMAN
Federal Public Defender

s/ Jeffrey B. Lazarus
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