In the Supreme Court of the United States

CHRYSTAL CLUES-ALEXANDER,

Defendant-Petitioner,

versus

STATE OF LOUISIANA,

Plaintiff-Respondent.

On Petition for a Writ of Certiorari to the Supreme Court of Louisiana

State v. Clues-Alexander

No. 2021-KK-00831 in the Supreme Court of Louisiana

PETITIONER'S APPLICATION FOR EXTENSION OF TIME TO FILE A PETITION FOR CERTIORARI

I.

Chrystal Clues-Alexander, Petitioner in the above-referenced case, requests a 60-day extension of time to file her petition for certiorari. Ongoing motions practice in the trial court may moot the necessity of a petition, and such motions practice is expected to conclude within the requested extension. As such, Petitioner submits an extension serves the interests of both justice and judicial economy in potentially averting the need for filing a petition with this Court.

II.

Absent an extension, Rule 13 requires Petitioner to file her petition by Monday, September 26, 2022, which is 90 days from the date Petitioner's timely petition for rehearing was denied by the Supreme Court of Louisiana in vote of 5-2. Petitioner respectfully requests the Court extend her deadline by 60 days, to and including Friday, November 25, 2022. This is Petitioner's first extension request, and Respondent has indicated no opposition. Petitioner is attaching a copy of the Supreme Court of Louisiana's 5-2 merits ruling and ruling on the petition for rehearing. Since the issuance of the merits opinion, there is a new motion now pending before the state trial court. Petitioner respectfully requests this extension of time to permit the disposition of the presently pending trial court motion.

Respectfully submitted,

HOGAN ATTORNEYS

By: <u>/s/ Jane Hogan</u>

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ATTORNEYS FOR DEFENDANT-

PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of September, 2022, I electronically filed the foregoing with the Clerk of the Court for the United States Supreme Court. I further certify that, as required by Sup. Ct. R. 29.3, I served one copy of the foregoing via U.S. Mail and electronic mail upon:

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Counsel for Respondents

<u>/s/ Jane Hogan</u>