

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

TERRELL JONES,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

On Petition for Writ of Certiorari to the
United States Court of Appeals
for the Eleventh Circuit

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

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

To the Honorable Clarence Thomas, 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 Terrell Jones respectfully requests that this Honorable Court grant him a thirty-two-day extension of time, until January 30, 2022, to file his Petition for a Writ of Certiorari.

Basis for Jurisdiction

The United States District Court for the Middle District of Florida had original jurisdiction over this criminal appeal under 18 U.S.C. § 3231. The United States Court of Appeals for the Eleventh Circuit reviewed that judgment under 18 U.S.C. § 3742 and 28 U.S.C. § 1291. The Eleventh Circuit issued its decision on June 1, 2022, and it denied Mr. Jones's petition for rehearing en banc on September 30, 2022. Mr. Jones's petition for a writ of certiorari is currently due on December 29, 2022. He is filing this Application more than ten days before that date pursuant to S. Ct. Rule 13.5. This Honorable Court's certiorari jurisdiction is invoked under 28 U.S.C. § 1254(1).

Judgment to be Reviewed

On June 1, 2022, the Eleventh Circuit affirmed Mr. Jones's conviction and sentence in an unpublished opinion. *See United States v. Jones*, No. 20-11841, 2022 WL 1763403 (11th Cir. June 1, 2022). A copy of the opinion is attached as Appendix A. The Eleventh Circuit denied Mr. Jones's petition for rehearing en banc on September 30, 2022. A copy of the Eleventh Circuit's order is attached as Appendix B.

Reasons for Granting an Extension of Time

In the weeks to come, undersigned counsel will devote his time to several other matters, including preparing for and presenting oral argument in *Hammoud v. United States*, appeal no. 20-13138 (11th Cir.), drafting the initial brief in *United States v. Wells*, appeal no. 22-13103 (11th Cir.), drafting a petition for rehearing en banc in *United States v. Conage*, appeal no. 17-13975 (11th Cir.), drafting a petition for a writ of certiorari in *United States v. Paquette*, Case No. 21-11365 (11th Cir.), helping a colleague prepare for oral argument in *United States v. Robinson*, Case No. 22-10949 (11th Cir.), and presenting at a local CJA panel training event. These facts support a finding of good cause under S. Ct. R. 13.5.

Conclusion

Wherefore, undersigned counsel respectfully asks this Honorable Court to grant a thirty-two-day extension of time, until January 30, 2022, in which to file a Petition for a Writ of Certiorari.

Respectfully submitted,

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Dated: October 21, 2022