

IN THE
SUPREME COURT OF THE UNITED STATES

No. _____

The People of the State of Illinois
Ex Rel. Anita Alvarez, Appellee

v.

\$59,914 United States Currency
Et al. (Ameen Salaam, Appellant).

APPLICATION FOR AN EXTENSION OF TIME TO FILE
A PETITION FOR WRIT OF CERTIORARI TO THE
SUPREME COURT OF THE STATE OF ILLINOIS

To the Honorable Amy Coney Barrett
Justice of the United States and
Circuit Justice for the Seventh Circuit

Steven A. Greenberg
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Applicant Ameen Salaam, by and through his undersigned counsel, pursuant to Rule 13(5) of the Rules of this Court, requests an extension of time of ninety days, to and including March 25, 2023, for the filing of a Petition for a Writ of Certiorari to review the decision of the Illinois Supreme court in *People ex rel. Alvarez v. Salaam* 2022 IL 126927, Petition for Rehearing denied September 26, 2022. A copy of the Supreme Court Opinion is attached as Exhibit A. The denial of Rehearing is attached as Exhibit B.

1. The jurisdiction of this Court is based on 28 U.S.C. § 1257(a).
2. The date within which a Petition for Writ of Certiorari would be due, if not extended, is December 25, 2022.
3. Applicant seeks review of the decision of the Illinois Supreme Court upholding the forfeiture of money.
4. Applicant's counsel has had multiple matters since the Supreme Court entered its decision that have required extensive preparation time, and court time.
5. Applicant's counsel has three jury trials (including two- and six-week trials) and numerous other matters scheduled between now and the time the Petition would be due. In addition, he will be travelling out of the country for a period of time in December and has family visiting over the holidays.
6. Applicant's counsel also has another Petition for Writ of Certiorari due at the end of February.
7. Applicant's counsel works at a small firm consisting only of himself and one associate.

8. The issue in this case concerns whether Applicant was denied due process when the state failed to provide notice of a civil forfeiture. According to the Illinois Supreme court, notice is only required for the *res*. Accordingly, the court found that due process did not require any notice to the potential claimant, and the trial court had subject matter jurisdiction regardless of notice.

9. Due to the complexity of the issue, the Petition will require extensive work by Applicant’s counsel.

WHEREFORE, Applicant Ameen Salaam respectfully requests that this Honorable Court grant his Application for Extension of Time to File a Petition for Writ of Certiorari to the Supreme Court of the State of Illinois and allow Applicant an extension of time up to and including March 25, 2023, within which to file his Petition for Writ of Certiorari, and for any other relief this Court finds fair and just.

Respectfully submitted,

/s/ Steven Greenberg _____

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December 7, 2022

PROOF OF SERVICE

Pursuant to the Rules of the Supreme Court of the United States, Rule 29, the undersigned certifies that the following document, *Application for Extension of Time to File a Petition for Writ of Certiorari to the Supreme Court of the State of Illinois*, was served via email and U.S. Mail to the following parties on December 7, 2022.

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By:

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