

No. 22A___

IN THE
Supreme Court of the United States

LEE JONES,

Applicant,

v.

UNITED STATES OF AMERICA,

Respondent.

**APPLICATION FOR AN EXTENSION OF TIME TO FILE A
PETITION FOR A WRIT OF CERTIORARI TO THE UNITED
STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT**

To the Honorable Brett M. Kavanaugh, Associate Justice of the Supreme Court and Circuit Justice for the Sixth Circuit:

1. Pursuant to Supreme Court Rules 13.5, 22, and 30, Applicant Lee Jones respectfully requests a 59-day extension of time, up to and including June 9, 2023, to file a petition for a writ of certiorari to the United States Court of Appeals for the Sixth Circuit, seeking review of that court's decision in *United States v. Jones*, 53 F.4th 414 (6th Cir. 2023). The Sixth Circuit issued its decision on November 16, 2022 and denied a timely rehearing petition on January 11, 2023. See Order, *United States v. Jones*, No. 21-3636 (6th Cir. Jan. 11, 2023). These orders are attached as Appendix A and Appendix B, respectively. 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 otherwise expire on April 11, 2023. This

Application is timely because it has been filed on March 30, 2023, more than ten days prior to the date on which the time for filing the petition is to expire.

2. Applicant has good cause for an extension of time. Applicant's counsel of record in the Sixth Circuit recently clerked at this Court and, under Supreme Court Rule 7, is currently barred from participating in the petition's preparation. The undersigned counsel had extensive professional obligations in January and February 2023, including a five-week jury trial that concluded on March 2, 2023 in Kentucky state court, and multiple matters in other courts that required extensive attention in March 2023. Moreover, the issues in this case warrant careful briefing and consideration, which counsel in favor of the requested extension given the need for the undersigned counsel to get fully up to speed. The quality of the petition would greatly benefit from an extension of time to allow counsel to complete the requisite research and writing.

3. WHEREFORE, Applicant respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for 59 days, to and including June 9, 2023.

Dated: March 30, 2023

Respectfully submitted,



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