

3. Pursuant to Rule 13.1, Mr. Gallman's petition for writ of certiorari is presently due on April 10, 2023.

4. Counsel respectfully requests an extension of time as he has been occupied preparing a reply brief filed on March 23, 2023, in *United States v. Garnet Small*, Third Circuit No. 22-1469. Counsel also remains occupied with briefing in the matters of *United States v. Lawrence Bush*, Third Circuit No. 22-2629, reply brief due April 5, 2023; *United States v. Matthew Packer*, Third Circuit No. 22-2554, reply brief due April 6, 2023; and *United States v. Marquise Latimer*, Third Circuit No. 23-1131, opening brief and joint appendix due April 14, 2023.

5. Counsel requests an additional thirty (30) days, or until May 10, 2023, in which to complete the petition for writ of certiorari.

WHEREFORE, for all the foregoing reasons of good cause, Keith M. Donoghue, Assistant Federal Defender, on behalf of the Federal Community Defender Office for the Eastern District of Pennsylvania, and on behalf of Stacy Gallman, respectfully requests that this Court grant this application for a 30-day extension of time for filing of a petition for writ of certiorari, and order that the petition be filed on or before May 10, 2023.

Respectfully submitted,

/s/ Keith M. Donoghue

KEITH M. DONOGHUE

Assistant Federal Defender

CERTIFICATE OF SERVICE

I, Keith M. Donoghue, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that I have served a copy of the *Application for Extension of Time for Filing Petition for Writ of Certiorari* upon Assistant United States Attorney Ashley N. Martin, by first class U.S. mail, postage prepaid, to her office located at the United States Attorney's Office, 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106, and upon the Office of the Solicitor General, by first class U.S. mail, postage prepaid at Department of Justice, Room 5614, 950 Pennsylvania Avenue, N.W., Washington, D.C. 20530-0001.

/s/ Keith M. Donoghue
KEITH M. DONOGHUE
Assistant Federal Defender

Date: March 28, 2023