

No. 23A___

IN THE
Supreme Court of the United States

RANITO ALLEN,

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 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 Ranito Allen respectfully requests a 60-day extension of time, up to and including February 24, 2024, 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for a writ of certiorari to the United States Court of Appeals for the Sixth Circuit, seeking review of that court's unpublished decision in *Ranito Allen v. USA.*, Case No. 21-5782 (6th Cir. June 23, 2023). The Sixth Circuit issued its decision on June 23, 2023, and denied a timely rehearing petition on September 25, 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 December 26, 2023. This Application is timely because it has been filed on

December 8, 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. Mr. Allen is currently an inmate at a federal correctional institution, and his opportunities to communicate with counsel are limited. An extension of time will allow for necessary communication regarding Mr. Allen's petition for a writ of certiorari. In addition, this case involves nuanced and novel questions of statutory interpretation. And counsel for Applicants have extensive professional obligations over the coming months, including a merits brief due December 13 in *Bissonnette v. LePage Bakeries Part St., LLC* (No. 23-51), a reply brief in support of certiorari due December 20 in *Ratzloff v. United States* (No. 23-310), a reply brief in support of a motion to dismiss due January 5 in *Beny v. University of Michigan* (E.D. Mich. No. 22-12021), a motion for summary judgment due January 25 in *KalshiEx LLC v. Commodity Futures Trading Commission* (D.D.C. No. 23-03257), and a reply brief due January 31 in *Riely v. Waterman* (CA7 No. 23-1253). In light of these competing commitments, the quality of the petition would greatly benefit from an extension of time.

WHEREFORE, Applicants respectfully request that an order be entered extending the time to file a petition for a writ of certiorari for 60 days, to and including February 24, 2024.

Dated: December 8, 2023

DUSTIN M. KOENIG

Respectfully submitted,

/s/ Amanda K. Rice
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