

NO. _____

IN THE
SUPREME COURT OF THE UNITED STATES

CRAIG ALAN MORRISON.

Petitioner,

v.

United States of America,

Respondent.

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

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

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To the Honorable Neil M. Gorsuch, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Tenth Circuit:

Petitioner Craig Alan Morrison, by undersigned counsel, prays for a 30-day extension of time, to and including February 12, 2024, in which to file a petition for a writ of certiorari. In support of this request, counsel states as follows:

1. On July 24, 2023, the United States Court of Appeals for the Tenth Circuit affirmed Mr. Morrison's sentence. (Attachment A.) Mr. Morrison petitioned for rehearing before the court of appeals, and that petition was denied on October 13, 2023.

2. Mr. Morrison has ninety days from that date to file a petition for a writ of certiorari. Sup. Ct. R. 13.3. The petition is therefore due on January 11, 2024. This application is being filed at least ten days before that date.

3. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

4. In addition to this petition, undersigned counsel is responsible for the opening briefs in *United States v. Martin*, 23-1191 (due December 27) and *United States v. Vargas*, 23-2107 (due January 3, 2024), responses to motions to enforce plea waiver in *United States v. Jimenez-Barrios*, 23-5078 (due December 26) and *United States v. Van Dam*, 23-8049 & 23-8050 (due December 28), and a status report in *United States v. Talbot*, 23-8025 (due January 22). Counsel also presented oral argument last month in *United States v. Daniels*, 22-1378 (argued November 15), and this month filed a petition

for certiorari in *United States v. Warrington*, 22-7003 (filed December 11). Additionally, in the district courts of Colorado and Wyoming, counsel is currently working on two compassionate release motions to be filed this month, and recently filed another earlier this month, and also is responsible for leading the FPD's review of individuals potentially eligible for a sentence reduction under the recent Amendment 821 to the United States Sentencing Guidelines, which currently entails the review of hundreds of cases and has taken up a significant amount of client's time recently. Finally, supervisory duties and counsel's ongoing work with colleagues in evaluating legal issues and assisting with pretrial motions in a number of cases in the district court also take up a significant amount of counsel's time.

5. Given their own current caseloads, as well as the work undersigned counsel has put into this case as counsel of record, no other attorney in the Office of the Federal Public Defender is in a position to file the petition by its current due date.

* * *

For these reasons, Petitioner Craig Alan Morrison. respectfully requests that an order be entered extending the time in which to petition for a writ of certiorari by 30 days, to and including February 12, 2024. *See* Sup. Ct. R. 13.5.

Respectfully submitted,

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