

App. No. _____

IN THE SUPREME COURT OF THE UNITED STATES

Quentin Freeman,

Petitioner

v.

Daniel Deas,

Respondent.

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

PETITIONER'S APPLICATION TO EXTEND TIME TO FILE A PETITION FOR A
WRIT OF *CERTIORARI*

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March 13, 2024

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PETITION FOR A WRIT OF CERTIORARI

To The Honorable John G. Roberts, Jr., as Circuit Justice for the
United States Court of Appeals for the Fourth Circuit:

Pursuant to Supreme Court Rule 13.5, Petitioner Quentin Freeman respectfully requests that the time to file a Petition for a Writ of Certiorari in this matter be extended for fourteen days to April 10, 2024. The Court of Appeals denied Petitioner's petition for rehearing on December 28, 2023. Absent an extension of time, the Petition would therefore be due on March 27, 2024. Petitioner is filing this Application

at least ten days before that date. *See* S. Ct. R. 13.5. This Court would have jurisdiction over the judgment under 28 U.S.C. §1254(1).

REASONS FOR GRANTING AN EXTENSION OF TIME

The time to file a Petition for Writ of Certiorari should be extended for fourteen days for these reasons:

1. The request for the extension of time is justified in order to provide Mr. Freeman's legal team adequate time to prepare the Petition:
 - a. Assigned counsel is the Director of the Appellate Litigation Program at the Georgetown University Law Center. The Appellate Litigation Program is a student clinic run through the law school in which third-year students, under the supervision of licensed attorneys, litigate appeals in this and other courts.
 - b. The clinic needs additional time to brief the issue fully. The clinic is briefing multiple cases in March and has two oral arguments in the Fourth Circuit the week before the Petition is currently due. An additional fourteen days to complete the Petition will allow counsel to balance the demands of this litigation with the demands of other litigation.

- c. The clinic also needs additional time confer with Mr. Freeman about this Petition. Mr. Freeman is incarcerated in North Carolina. Shortly after the Fourth Circuit denied rehearing, Mr. Freeman was transferred to a new facility, delaying the clinic's ability to communicate with him. Although the clinic was able to speak with him, we hope to share a draft of the Petition with Mr. Freeman and confer with him about the substance of the Petition before filing. It takes time for the clinic to set up legal calls and exchange mail with Mr. Freeman. An additional fourteen days will provide the clinic with enough time to share a draft of the Petition with Mr. Freeman and ensure he is satisfied with its contents.
2. The extension will provide adequate time for counsel fully to prepare a Petition on Mr. Freeman's behalf.
3. No meaningful prejudice would arise from the extension. Counsel for Respondent has indicated that she has no opposition to this application. In addition, regardless of whether an extension is granted, this Court would hear oral argument and issue its opinion in the October 2024 term should the certiorari petition be granted.

CONCLUSION

For the foregoing reasons, the application should be granted and the deadline for filing a petition for a writ of *certiorari* should be extended fourteen days to and including April 10, 2024.

Respectfully submitted,

/s/ Erica Hashimoto

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