

No. _____

AYANA SAUNDERS,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

**APPLICATION FOR AN EXTENSION OF TIME IN WHICH TO FILE
PETITION FOR WRIT OF CERTIORARI**

To the Honorable Brent M. Kavanaugh, Associate Justice of the Supreme Court of the Supreme Court of the United States and Circuit Justice for the United States Court of Appeals for the Sixth Circuit:

Petitioner Ayana Saunders, through counsel respectfully requests a 60-day extension of time to file a Petition for Writ of Certiorari, up to and including August 8, 2025, pursuant to Supreme Court Rule 13.5 and Rule 22.

On February 2, 2025, the United States Court of Appeals for the Sixth Circuit entered an Order and Judgment dismissing Ms. Saunders' appeal and affirming her conviction and sentence. See, Appendix A. On March 11, 2025, the United States Court of Appeals for the Sixth Circuit entered an Order denying Ms. Saunders' Petition for Rehearing with Suggestion of Rehearing En Banc. See, Appendix B.

This application is filed at least 10 days prior to the deadline for filing a Petition for Writ of Certiorari. In support of this Application, the Petitioner shows the following:

1. Undersigned counsel was appointed to represent Ms. Saunders under the provisions of the Criminal Justice Act. 18 U.S.C. §3006A.

2. On April 21, 2024, Ms. Saunders was convicted in the United States District Court for the Western District of Tennessee on one count of Conspiracy to Commit Wire Fraud under 18 U.S.C. §1349, and one (1) count of Conspiracy to Commit Money Laundering under 18 U.S.C. §1956(h).

3. On appeal, in addition to arguing that the evidence was insufficient to support her convictions, Ms. Saunders also argued that the proof at trial constituted a constructive variance or amendment from the indictment, and that venue was improper in the United States District Court for the Western District of Tennessee.

4. Ms. Saunders' deadline for an Application for Writ of Certiorari is currently June 9, 2025.

5. Good cause exists for an extension. Since the Sixth Circuit Court of Appeals ruling, counsel has been handling an unusually heavy caseload consisting of both criminal and civil cases in the State of Tennessee, and Federal Court along with several appeals to the United States Court of Appeals for the Sixth Circuit all appointed under the Criminal Justice Act.

Sufficient ground exists, and Ms. Saunders respectfully requests this Court grant her a 60-day extension of the deadline to file a Petition for Writ of Certiorari to the Sixth Circuit Court of Appeals to up to and including August 8, 2025.

Respectfully submitted this 29th day of May 2025

/s/ Mark E. Brown
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Attorney for the Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of May 2025, a true and exact copy of this document has been served via this Court's electronic filing system. Service is made on all parties appearing on this Court's electronic service certificate. All parties in interest may access this pleading via ECF.

Service is also made on the OFFICE OF THE SOLICITOR GENERAL OF THE UNITED STATES, UNITED STATES DEPARTMENT OF JUSTICE, ROOM 5616, 950 PENNSYLVANIA AVENUE, N.W., WASHINGTON, D.C. 20530-0001, by placing the same in the United States Mail, first class postage prepaid.

/s/ Mark E. Brown

Mark E. Brown