

No. 24A_____

In the Supreme Court of the United States

JOHN JACKSON, *PETITIONER*,

v.

UNITED STATES OF AMERICA, *RESPONDENT*

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

To the Honorable Samuel A. Alito, Jr., Associate Justice of the
Supreme Court of the United States and Circuit Justice for the
Third Circuit:

Petitioner-Applicant John Jackson respectfully requests a 60-day
extension of time to file his petition for a writ of certiorari in this
Court to and including August 19, 2025.

1. Timeliness and Jurisdiction

On March 21, 2025, the United States Court of Appeals for the
Third Circuit filed a precedential opinion affirming Mr. Jackson's
sentence in case number 2:13-cr-00290-002 (D. N.J.). Appx. A. Mr.
Jackson's petition for a writ of certiorari is due on or before June
20, 2025. *See* 28 U.S.C. § 2101(c); Sup. Ct. R. 13.5. This application

is being filed at least ten days before that date. *See* Sup. Ct. R. 13.5, 30.2. This Court's jurisdiction will be invoked under 28 U.S.C. § 1254(1).

2. Opinion Below

The Third Circuit's March 21, 2025, opinion, authored by Judge Chung and joined by Judges Bibas and Roth, is attached as Appendix A. The opinion is reported at 132 F.4th 266 (3d Cir. 2025). The appeal was consolidated with the appeal of co-defendant Carolyn Jackson.

3. Reasons for Granting the Extension

This case presents an important constitutional question, that of whether Mr. Jackson's double jeopardy or due process rights were violated in the course of three remands for resentencing. Addressing this matter of first impression, the Third Circuit rejected the argument and affirmed the sentence. App. A at 9.

Undersigned counsel is an Assistant Federal Public Defender who represented Mr. Jackson on direct appeal under the Criminal Justice Act, 18 U.S.C. § 3006A et. seq. Counsel respectfully requests a 60-day extension of the certiorari deadline for several reasons.

First, the issue is complex and, as noted, was one of first

impression in the Third Circuit.

Second, counsel is currently working on several appeals before the Third Circuit with imminent deadlines, including: (1) an initial brief in *United States v. Hill*, No. 25-1235 (brief due June 16, 2025); (2) an initial brief in a consolidated appeal, *United States v. Baskerville*, Nos. 23-1460 and 23-2753 (brief due June 20, 2025); and (3) a reply brief in *United States v. Goode*, No. 23-1279 (brief due June 27, 2025). Counsel is also working on appeals with later deadlines and has been working on several district court matters as well.

Third, counsel notes that co-defendant Carolyn Jackson intends to file a petition for certiorari raising the same issue and has requested a 60-day extension. *See* No. 24A1197. Granting a similar extension here would allow counsel to coordinate efforts and avoid duplicative filings in this Court.

Counsel accordingly believes there is good cause for the requested extension, as required by Supreme Court Rule 13.5.

For these reasons, Petitioner-Applicant John Jackson respectfully requests that an order be entered extending his time to petition for certiorari in the above-captioned case to and

including August 19, 2025.

Respectfully submitted,

Louise Arkel

Louise Arkel
Assistant Federal Public Defender
1002 Broad Street
Newark, NJ 07102
(973) 622-7535
Louise_Arkel@fd.org

Counsel for Petitioner-Applicant
John Jackson

Dated: June 9, 2025