

No. _____

IN THE SUPREME COURT OF THE UNITED STATES OF AMERICA

HONG THU NGUYEN,

Petitioner,

vs.

CHRIS MCBEE, Warden, Chillicothe Correctional Center

and

ANDREW BAILEY, Attorney General, State of Missouri,

Respondents

**APPLICATION FOR EXTENSION OF TIME
IN WHICH TO FILE PETITION FOR A WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT**

TO: THE HONORABLE BRETT M. KAVANAUGH, ASSOCIATE JUSTICE OF
THE UNITED STATES SUPREME COURT, AND CIRCUIT JUSTICE FOR
THE EIGHTH CIRCUIT:

Pursuant to United States Supreme Court Rule 13.5, Petitioner requests a
thirty (30) day extension of time in which to file her Petition for a Writ of Certiorari
in this Court up to and including July 24, 2022 (thirty days from the current
deadline of June 24, 2025). In support of this Application, Ms. Nguyen states:

1. Petitioner, Hong Thu Nguyen, is a Missouri prisoner housed currently
at the Chillicothe Correctional Center in Chillicothe, Missouri.

2. Ms. Nguyen seeks review in this Court of the decision of the United States Court of Appeals for the Eighth Circuit denying a certificate of appealability as to any of the grounds for relief in her habeas corpus petition. A copy of the order denying the certificate of appealability, entered on March 26, 2025, is attached. No petition for rehearing was filed.

3. Ms. Nguyen's time in which to petition this Court for a Writ of Certiorari expires on June 24, 2025 (90 days calculated from March 26, 2025).

4. Pursuant to United States Supreme Court Rule 13.5, this Application is being filed more than ten days before June 24, 2025.

5. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1254.

6. During the period for preparing a certiorari petition in this matter, counsel for Ms. Nguyen has filed briefs in the U.S. Eighth Circuit Court of Appeals in *United States v. Bolton* and *United States v. Sims*; filed briefs in the Missouri Courts of Appeals in the cases of *Alexander v. State* and *Lawrence v. State*; and filed a petition for rehearing and transfer in the Missouri Court of Appeals and an original application for transfer in the Missouri Supreme Court in *Emmerson v. State*. Counsel underwent surgery on April 2, 2025, and did limited work in month of April. In addition, counsel is currently conferring with Ms. Nguyen and her family concerning the decision to file the petition. Because Ms. Nguyen speaks limited English and conversations with her require an interpreter, this process has been somewhat extended. In addition, adequate time for printing is needed.

7. Ms. Nguyen has not previously petitioned this Court for an extension of time in which to file a Petition for a Writ of Certiorari.

8. This Application is made in good faith and not for purposes of delay.

Wherefore, Ms. Nguyen requests that an order issue establishing the due date for Petitioner's Petition for a Writ of Certiorari as **July 24, 2025**.

Dated June 5, 2025.

Respectfully submitted,

/s/ Elizabeth Unger Carlyle

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