

No. \_\_\_\_\_

---

---

IN THE  
SUPREME COURT OF THE UNITED STATES

---

**JAMES JOSEPH BRYANT,**  
*Petitioner,*

v.

**UNITED STATES OF AMERICA,**  
*Respondent.*

---

**ON PETITION FOR WRIT OF CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT**

---

**APPLICATION FOR EXTENSION OF TIME TO  
FILE A PETITION FOR A WRIT OF CERTIORARI**

---

A. Fitzgerald Hall, Esq.  
Federal Defender, MDFL

Jonas Cummings, Esq.  
Federal Defender's Office  
200 West Forsyth St., Suite 1240  
Jacksonville, Florida 32202  
Telephone: (904) 232-3039  
E-mail: jonas\_cummings@fd.org  
Counsel of record

---

---

**APPLICATION FOR EXTENSION OF TIME TO FILE A  
PETITION FOR A WRIT OF CERTIORARI**

To the Honorable Clarence Thomas, Circuit Justice for the United States Court of Appeals for the Eleventh Circuit:

Pursuant to Rule 13.5 of the Rules of the Supreme Court of the United States, Petitioner, James Joseph Bryant respectfully requests that this Honorable Court grant a thirty (30) day extension of time, up to and including Thursday, July 31, 2025, to file his Petition for a Writ of Certiorari. *See* Sup. Ct. R. 30.1.

**BASIS FOR JURISDICTION**

The United States District Court for the Middle District of Florida had original jurisdiction over this criminal case under 18 U.S.C. § 3231. The United States Court of Appeals for the Eleventh Circuit reviewed that judgment under 28 U.S.C. § 1291 and 18 U.S.C. § 3746. The Eleventh Circuit issued its decision on remand from this Court on April 2, 2025. Appendix A.

This Court will have jurisdiction in this case over any timely filed petition for a writ of certiorari under 28 U.S.C. § 1254(1). Under Supreme Court Rules 13.1, 13.3, and 30.1, Mr. Bryant's petition for a writ of certiorari is currently due July 1, 2025. He files this Application more than ten days in advance pursuant to Supreme Court Rules 13.5 and 30.2.

**JUDGMENT TO BE REVIEWED**

On December 29, 2023, the Eleventh Circuit first affirmed Mr. Bryant's judgment of conviction and sentence. *See United States v. Bryant*, No. 19-12283,

2023 WL 9018411 (11th Cir. Dec. 29, 2023). A copy of the opinion is attached as Appendix C. Mr. Bryant petitioned this Court for certiorari review, and on October 7, 2024, this Court granted the petition, vacated the Eleventh Circuit’s 2023 judgment, and remanded for further proceedings (“GVR’ed”) consistent with *Erlinger v. United States*, 602 U.S. 821 (2024). *Bryant v. United States*, 145 S. Ct. 122 (2025) (Mem.). A copy of this Court’s GVR order is attached as Appendix B. On remand, the Eleventh Circuit once again affirmed Mr. Bryant’s conviction and sentence. See *United States v. Bryant*, No. 19-12283, 2025 WL 987735 (11th Cir. Apr. 2, 2025). A copy of the Eleventh Circuit’s opinion on remand is attached as Appendix A.

#### **REASONS FOR GRANTING AN EXTENSION OF TIME**

Mr. Bryant is represented by the Federal Defender’s Office for the Middle District of Florida. The district is large, active, and busy. The Appellate Division handles direct appeals, collateral challenges to state and federal judgments, and other post-conviction motions filed under 18 U.S.C. § 3582. Currently, the Appellate Division has approximately 200 open appeals, not counting other post-conviction matters for which the Appellate Division is responsible in the district court.

In addition to representing Mr. Bryant, the undersigned counsel has 23 other clients with pending cases. He has recently filed briefs in several cases and has upcoming deadlines in others. Also, like other attorneys within the Appellate

Division, the undersigned is responsible for reviewing colleagues' briefs, preparing colleagues for oral argument, and providing trial support when called upon.

An extension of time would allow the undersigned counsel to effectively prepare Mr. Bryant's petition for certiorari while also contributing to his other clients' pending matters and attending to his other duties within the Federal Defender's Office. Mr. Bryant and the undersigned counsel respectfully submit that the facts herein support a finding of good cause under S. Ct. R. 13.5 for a 30-day extension of time, up to and including July 31, 2025, to file his petition for certiorari.

#### CONCLUSION

Wherefore, undersigned counsel respectfully asks this Honorable Court to grant a 30-day extension of time, up to and including July 31, 2025, in which to file a petition for a writ of certiorari.

Respectfully submitted,

A. Fitzgerald Hall, Esq.  
Federal Defender

/s/ Jonas Cummings  
Jonas Cummings, Esq.  
Florida Bar Number 105830  
Federal Defender's Office  
200 West Forsyth St., Suite 1240  
Jacksonville, Florida 32202  
Telephone: (904) 232-3039  
E-mail: jonas\_cummings@fd.org  
Counsel of record

Dated: June 18, 2025