

No:

IN THE  
SUPREME COURT OF THE UNITED STATES

DIEUDRUCH EMMANUEL,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

**APPLICATION FOR ENLARGEMENT OF TIME FOR FILING OF  
A WRIT OF CERTIORARI**

COMES NOW, the Petitioner, Dieudruch Emmanuel, by and through his undersigned counsel, pursuant to Rule 13(5), and respectfully requests, based upon good cause, that the Court extend the time to file a Petition for Writ of Certiorari for a period of 60 days from the current due date of March 2, 2025, and as grounds and in support thereof states as follows:

1. The Petitioner, Dieudruch Emmanuel, was convicted of Conspiracy to Distribute Controlled Substance (Count I) and Sell/Distribute/Dispense Controlled Substance (Counts VI, VIII, and IX).
2. The Petitioner, Dieudruch Emmanuel, filed an appeal to the 11<sup>th</sup> Circuit Court of Appeal, raising the following issues:

- I. THE DISTRICT COURT REVERSIBLY ERRED BY  
ALLOWING THE GOVERNMENT TO INTRODUCE  
PRIVILEGED TELEPHONE RECORDINGS BETWEEN  
DIEUDRUCH EMMANUEL AND HIS WIFE

II. THE DISTRICT COURT COMMITTED CLEAR ERROR  
IN DETERMINING DIEUDRUCH EMMANUEL'S  
ROLE IN THE OFFENSE

3. The Judgment sought to be reviewed in this case is the Opinion issued by the Eleventh Circuit Court of Appeal in *United States of America v. Dieudruch Emmanuel*, Case No: 23-10125 on December 2, 2024, a copy of which is attached hereto as Exhibit "A".

4. The Petitioner, Dieudruch Emmanuel, desires to seek certiorari review of the 11<sup>th</sup> Circuit Court of Appeal's Opinion as questions of great public importance, this case warrants further review.

5. The basis for jurisdiction in this Court are violations of the Petitioner's constitutional rights to due process of law, a meaningful adversarial process, and to a fair trial. Additionally, violations of his 4th, 5th, 6th, and 14th Amendments rights have been alleged.

6. Counsel's practice focuses on appellate and post-conviction matters in state and federal courts. An extension of time is justified in this case based upon:

- a) Counsel is working continuously and diligently on a number of appellate post-conviction matters in state and federal courts with upcoming deadlines; and
- b) Counsel had been delayed in the preparation of Dieudruch Emmanuel's Petition based upon medical and health reasons.

7. Pursuant to Rule 13, Supreme Court Rules, this Application is filed with the Clerk at least 10 days before the deadline for filing said Petition, and is based upon extraordinary circumstances warranting the requested relief.

8. This extension of time is based upon unforeseen circumstances and good cause.

9. No prejudice shall enure to any party as the Defendant is presently in custody, serving an 87 month sentence.

10. It is respectfully requested that the time for the filing of the Petition for Writ of Certiorari be enlarged for a period of 60 days from the current due date of March 2, 2025.

WHEREFORE, based upon the foregoing grounds and authority, the Petitioner, Dieudruch Emmanuel, respectfully request this Honorable Court enter an Order enlarging the time in which he may file his Petition for Writ of Certiorari up to and including 60 days from the current due date of March 2, 2025.

I hereby certify that on **February 18, 2025** I electronically filed the foregoing document with the Clerk of the Supreme Court via Electronic Filing / CM/ECF and also provided via U.S. Mail. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF and via U.S. Mail to the Solicitor General, 950 Pennsylvania Avenue, NW, Washington, D.C. 20530.

Respectfully submitted,

LAW OFFICES OF RICHARD ROSENBAUM  
*Primary Email:* Richard@RLRosenbaum.com  
*Secondary Email:* Pleadings@RLRosenbaum.com

**S/RICHARD L. ROSENBAUM**  
Richard L. Rosenbaum, Esq.  
Fla. Bar No: 394688  
315 SE 7<sup>th</sup> Street , Suite 300  
Fort Lauderdale, FL 33301  
Telephone (954) 522-7007  
Facsimile (954) 522-7003