

No. 24A-____
IN THE
Supreme Court of the United States

UNITED STATES OF AMERICA

RESPONDENT,

v.

ALEXANDER SITTENFELD aka P.G. Sittenfeld

PETITIONER.

**APPLICATION OF PETITIONER ALEXANDER “P.G.”
SITTENFELD FOR EXTENSION OF TIME TO FILE A PETITION
FOR A WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE SIXTH CIRCUIT**

To the Honorable Brett Kavanaugh, Associate Justice of the Supreme Court
and Circuit Justice for the Sixth Circuit:

1. Pursuant to Supreme Court Rules 13.5, 22, and 30, Applicant Alexander “P.G.” Sittenfeld respectfully requests a 30-day extension of time, up to and including Wednesday, June 11, 2025, to file a petition for a writ of certiorari to the United States Court of Appeals for the Sixth Circuit, seeking review of that court’s decision rejecting Mr. Sittenfeld’s challenge to his conviction for Hobbs Act extortion and federal-program bribery. The Sixth Circuit issued its decision on February 11, 2025. A copy of that decision is attached as Appendix A. The jurisdiction of this Court in this case will be invoked under 28 U.S.C. § 1254(a), and the time to file a petition for a writ of certiorari will otherwise expire on Monday, May 12, 2025. This Application for Extension of Time is timely because it has been

filed more than ten days prior to the date on which the time for filing the petition is to expire.

2. Petitioner has good cause for an extension of time. This case involves important questions regarding the line between protected First Amendment campaign speech and illegal bribery—a line the Sixth Circuit panel affirming Mr. Sittenfeld’s conviction described as “blurr[y],” explaining that “it may be time for the [Supreme] Court to revisit or refine the doctrine” to provide clarity. *United States v. Sittenfeld*, 128 F.4th 752, 761, 772 n.8 (6th Cir. 2025) (Nalbandian, J.); *see also id.* at 787 (Murphy, J., concurring) (describing “vague” “line” that “separate[s] protected political speech from illegal bribery”); *id.* at 806 (Bush, J., dissenting) (“[I]t would be helpful for the Supreme Court to provide guidance here.”). And counsel for Petitioners have extensive professional and personal obligations over the coming months. For example, counsel of record has work and personal travel scheduled for April 12–13, May 7–9, and May 24 to June 1. Counsel of record also has numerous obligations in other pending matters during the relevant time period, including an oral argument on April 29 in *Laboratory Corporation of America Holdings v. Davis*, Case No. 24-304 (U.S.) and several other deadlines in the coming months. Other members of the legal team likewise have conflicting professional and personal commitments. The issues in this case warrant careful briefing and consideration, which counsels in favor of the requested extension.

3. WHEREFORE, Petitioners respectfully request that an order be entered extending the time to June 11, 2025.

Dated: March 31, 2025

Respectfully submitted,

/s/ Noel J. Francisco
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CERTIFICATE OF SERVICE

As required by Supreme Court Rule 29.5, I, Noel J. Francisco, a member of the Supreme Court Bar, hereby certify that one copy of the attached Application for an Extension of Time to File a Petition for a Writ of Certiorari to the United States Court of Appeals for the Sixth Circuit was served on March 31, 2025, via electronic mail and by the United Parcel Service on:

SARAH M. HARRIS
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Dated: March 31, 2025

/s/ Noel J. Francisco
Noel J. Francisco