

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

DAVID ROBINSON JR.,
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 WRIT OF CERTIORARI

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**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 Appeal for the Eleventh Circuit:

Pursuant to Rule 13.5 of the Rules of the Supreme Court of the United States, Petitioner David Robinson Jr. respectfully requests a 30-day extension of time, up to and including July 18, 2025, to file his petition for writ of certiorari.

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 the district court's judgment under 18 U.S.C. § 3742 and 28 U.S.C. § 1291. The Eleventh Circuit issued its decision on March 20, 2025.

This Court will have jurisdiction over a timely filed petition for writ of certiorari in this case under 28 U.S.C. § 1254(1). Mr. Robinson's petition is due on June 18, 2025, and he is filing this application more than 10 days before that date pursuant to Supreme Court Rule 13.5. Under that rule, the Court may extend the time to file a petition for writ of certiorari for a period not exceeding 60 days.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

On March 20, 2025, the Eleventh Circuit affirmed Mr. Robinson's judgment and conviction. *See United States v. Robinson*, No. 23-12551, 2025 WL 870981 (11th Cir. Mar. 20, 2025). A copy of the opinion is attached as Appendix A. He did not seek rehearing.

REASONS FOR GRANTING AN EXTENSION OF TIME

The undersigned counsel of record is a Research and Writing Attorney for the Federal Defender's Office in the Middle District of Florida. At present, he is counsel of record in 14 open appeals in the Eleventh Circuit, in addition to numerous compassionate release and habeas cases in the district court. Counsel also handles other responsibilities, such as assisting private attorneys appointed under the Criminal Justice Act and assisting attorneys within his Office's trial unit.

On June 4, 2025, counsel will present oral argument to the Eleventh Circuit in *United States v. Ladson*, No. 24-10731 (11th Cir.). In the next 40 days, counsel is preparing initial briefs in *United States v. Bertetto*, No. 24-10602 (11th Cir.) and *United States v. Lopez-Zarate*, No. 25-10663 (11th Cir.), and a § 2254 habeas brief in *Hampton v. Secretary, Florida Department of Corrections*, No. 3:16-cv-00244 (M.D. Fla.).

A 30-day extension (until July 18, 2025) would allow undersigned counsel to contribute effectively to pending client matters, including Mr. Robinson's petition, as well as various administrative matters. He respectfully submits that these facts support a finding of good cause under S. Ct. R. 13.5.

CONCLUSION

Wherefore, undersigned counsel respectfully asks the Court to grant a 30-day extension of time, until July 18, 2025, in which to file Mr. Robinson's petition for a writ of certiorari.

Respectfully submitted,

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Dated: May 7, 2025