

IN THE  
Supreme Court of the United States

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WILLIAM COLLINS, III,

*Applicant,*

*v.*

PAMELA JO BONDI, Attorney General of the  
United States; DANIEL P. DRISCOLL,  
Acting Director Bureau of Alcohol, Tobacco,  
Firearms and Explosives; ANTHONY G.  
BROWN, Maryland Attorney General; LT.  
COL. ROLAND L. BUTLER, JR., Acting  
Secretary, Maryland State Police,

*Respondents.*

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ON APPLICATION FOR EXTENSION OF TIME TO FILE A PETITION  
FOR WRIT OF CERTIORARI TO CHIEF JUSTICE JOHN G. ROBERTS, JR.

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

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July 21, 2025

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## APPLICATION

To the Honorable John G. Roberts, Jr., Chief Justice of the United States and Circuit Justice for the Fourth Circuit:

Pursuant to Rule 13.5 of the Rules of this Court and 28 U.S.C. § 2101(c), Applicant William Collins, III respectfully requests a 58-day extension of time, up to and including October 10, 2025, within which to file a petition for a writ of certiorari to review the judgment of the Court of Appeals for the Fourth Circuit in this case.

1. The Fourth Circuit issued its decision on May 15, 2025. *See Collins v. Bondi*, No. 23-2218, 2025 WL 1409861 (4th Cir. May 15, 2025), App. A. Unless extended, the time to file a petition for writ of certiorari will expire on August 13, 2025. This application is being filed more than ten days before Applicant's petition is currently due. *See* S. Ct. R. 13.5. The jurisdiction of this Court would be invoked under 28 U.S.C. § 1254.

2. Mr. Collins is a citizen of Maryland with a history of responsible long-gun ownership. In June 2022, the State denied Mr. Collins's application for a Handgun Qualification License on account of a 1998 conviction for common law resisting arrest and a 2001 conviction of possession of a controlled substance. Desiring to possess a handgun for self-defense and having been a law-abiding citizen for over 20 years, Mr. Collins filed suit in the District of Maryland alleging that the State's application of 18 U.S.C. § 922(g)(1) was unconstitutional as to him. The District Court dismissed his case on October 20, 2023.

3. On appeal, the Fourth Circuit affirmed in an unpublished *per curiam* opinion. The court cited *United States v. Hunt*, 123 F.4th 697 (4th Cir. 2024) (cert.

denied June 2, 2025), for the proposition that the Fourth Circuit’s previous decisions rejecting as-applied challenges to Section 922(g)(1) remain binding because they can be read “harmoniously” with *N.Y. State Rifle & Pistol Ass’n v. Bruen*, 597 U.S. 1 (2022) and *United States v. Rahimi*, 602 U.S. 680 (2024). In other words, the Fourth Circuit continues to hold that felon gun restrictions are presumptively lawful.

4. The Fourth Circuit’s judgment warrants this Court’s review because it presents a compelling vehicle for this Court to elucidate the history of our Nation’s firearms regulation. The Second Amendment protects the right of the people to carry firearms for self-defense. The question of which crimes are so dangerous and threatening that they permanently remove the offender from the class of “people” protected by the Amendment is a crucial one.

5. The Circuit Courts of Appeals disagree about whether an offender may assert an as-applied challenge to Section 922(g)(1). In addition to the Fourth Circuit, the Eighth, Tenth, and Eleventh Circuits hold that a defendant may not. *United States v. Jackson*, 110 F.4th 1120, 1129 (8th Cir. 2024), *cert. denied*, \_\_ S. Ct. \_\_, 2025 WL 1426707 (May 19, 2025); *Vincent v. Bondi*, 127 F.4th 1263, 1265 (10th Cir. 2025); *United States v. Dubois*, 94 F.4th 1284 (11th Cir. 2024), *cert granted, vacated*, 145 S. Ct. 1041 (2025), *remanded to*, 139 F.4th 887 (11th Cir. 2025). The First, Third, Fifth, Sixth, and Ninth Circuits hold that an offender may. *See United States v. Langston*, 110 F.4th 408, 419 (1st Cir. 2024), *cert. denied*, 145 S. Ct. 581; *Range v. Att’y Gen. United States*, 53 F.4th 96 (3d Cir. 2022), *rev’d*, 69

F.4th 96 (3d Cir. 2023) (en banc), *cert. granted, vacated*, 144 S. Ct. 2706, *remanded to*, 124 F.4th 218, 224 (3d Cir. 2024); *United States v. Diaz*, 116 F.4th 458, 472 (5th Cir. 2024); *United States v. Williams*, 113 F.4th 637, 657 (6th Cir. 2024); *United States v. Duarte*, 137 F.4th 743 (9th Cir. 2025). The Seventh has not conclusively decided the issue.

6. Mr. Collins’ petition—with his decades-old convictions for common law resisting arrest and possession of a controlled substance, and his history of law-abiding behavior—will permit the Court to explore the question of which offenders do and do not pose a permanent threat to the orderly functioning of society with a more fulsome set of facts and circumstances.

7. Good cause exists for an extension. The University of North Carolina School of Law Supreme Court Program has been asked to act as counsel in preparing the petition. The Program was not involved in the case in the Fourth Circuit and was asked only recently to prepare the petition. Faculty members will act as counsel in the matter and will be assisted by law students. The faculty members need time to research and analyze fully the issues presented, including the historical treatment of resisting arrest. Also, law students are on summer break and will not return until the Fall semester begins on August 18, 2025.

8. For these reasons, Applicant respectfully requests that an order be entered extending the time to file a petition for certiorari up to and including October 10, 2025.

Respectfully submitted,

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July 21, 2025

/s/Elizabeth Guild Simpson

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## APPENDIX

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**UNPUBLISHED**

UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

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**No. 23-2218**

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WILLIAM COLLINS, III,

Plaintiff - Appellant,

v.

PAMELA JO BONDI, Attorney General of the United States; DANIEL P. DRISCOLL, Acting Director Bureau of Alcohol, Tobacco, Firearms and Explosives; ANTHONY G. BROWN, Maryland Attorney General; LT. COL. ROLAND L. BUTLER, JR., Acting Secretary, Maryland State Police,

Defendants - Appellees.

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Appeal from the United States District Court for the District of Maryland, at Baltimore.  
Albert David Copperthite, Magistrate Judge. (1:23-cv-00042-ADC)

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Submitted: April 23, 2025

Decided: May 15, 2025

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Before WILKINSON and KING, Circuit Judges, and TRAXLER, Senior Circuit Judge.

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Affirmed by unpublished per curiam opinion.

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**ON BRIEF:** Marc D. Schifanelli, Stevensville, Maryland, for Appellant. Brian M. Boynton, Principal Deputy Assistant Attorney General, Mark B. Stern, Michael S. Raab, Kevin B. Soter, Civil Division, UNITED STATES DEPARTMENT OF JUSTICE, Washington, D.C.; Erek L. Barron, United States Attorney, OFFICE OF THE UNITED STATES ATTORNEY, Baltimore, Maryland, for Federal Appellees. Anthony G. Brown, Attorney General, Mark H. Bowen, Assistant Attorney General, Kyle A. Ashe, Assistant

Attorney General, Everett C. Byrant, Assistant Attorney General, OFFICE OF THE ATTORNEY GENERAL OF MARYLAND, Pikesville, Maryland, for Appellees Roland L. Butler, Jr., and Anthony G. Brown.

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Unpublished opinions are not binding precedent in this circuit.

PER CURIAM:

William Collins, III, appeals the district court's order granting Defendants' motions to dismiss Collins's amended complaint asserting Second and Fourteenth Amendment challenges to 18 U.S.C. § 922(g)(1) and Maryland state disbarment laws. We have reviewed the record and find no reversible error. *See United States v. Hunt*, 123 F.4th 697, 702 (4th Cir. 2024), *pet. for cert. filed*, No. 24-6818 (U.S. Mar. 20, 2025); *Hamilton v. Pallozzi*, 848 F.3d 614, 623 (4th Cir. 2017), *abrogated on other grounds by N.Y. State Rifle & Pistol Ass'n Inc.*, 597 U.S. 1 (2022). Accordingly, we affirm the district court's order. *Collins v. Garland*, No. 1:23-cv-00042-ADC (D. Md., Oct. 20, 2023). We dispense with oral argument because the facts and legal contentions are adequately presented in the materials before this court and argument would not aid the decisional process.

*AFFIRMED*