

Zoë Dolan

www.zoedolan.com
zdolan@gmail.com

Attorney At Law
Admitted NY & CA
(347) 301-5180

555 West 5th Street, 35th Floor
Los Angeles, CA 90013

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Honorable Ruth Bader Ginsburg
Circuit Justice for the Second Circuit
Supreme Court of the United States
1 First St. NE Washington, DC 20543

Re: *United States v. Abu Ghayth*
14-3674-cr (2d Cir.)
Undocketed as yet in the Supreme Court

Dear Justice Ginsburg:

This letter is submitted to request a 90-day extension of the time in which to file a petition for certiorari in the above-referenced matter – from December 27, 2017 to March 27, 2018 – for the reasons that follow.

This case is relatively complex, involving a voluminous record from a multi-week trial in the United States District Court for the Southern District of New York and an appeal presenting four issues for adjudication by the United States Court of Appeals for the Second Circuit. Although I have been working diligently on framing research and analysis for the cert petition, I have been unable to complete the submission in a timely matter due to professional obligations in other matters – including several Criminal Justice Act cases such as this one. I am currently scheduled to begin trial tomorrow in *United States v. Price*, 17-cr-301-NGG, in the United States District Court for the Eastern District of New York. On January 30, 2018, I am scheduled to begin trial in *United States v. Lang*, 16-cr-376-JAK, in the United States District Court for the Central District of California. I am also working on an appeal pending in the United States Court of Appeals for the Ninth Circuit in *United States v. Gordon*, 15-50267, which arises from a conviction following a one-week RICO trial and incorporates complex Sixth Amendment issues; that opening brief is currently due on January 2, 2018. Meanwhile, of course, I am balancing family and personal commitments over the holidays.

Your Honor's consideration of this application is appreciated.

Yours sincerely,

s/
Zoë Dolan