

IN THE SUPREME COURT OF THE UNITED STATES

MICHAEL YOUNG,

:

Petitioner

VS.

:

No. _____

UNITED STATES OF AMERICA :

**APPLICATION FOR EXTENSION OF TIME
FOR FILING PETITION FOR WRIT OF CERTIORARI**

Brett G. Sweitzer, Assistant Federal Defender, Chief of Appeals, Federal Community Defender Office for the Eastern District of Pennsylvania, respectfully requests the granting of the instant application for a 30-day extension of time for filing a petition for writ of certiorari, and in support represents as follows:

1. Petitioner Michael Young was sentenced in the Eastern District of Pennsylvania on March 21, 2016, to a total term of imprisonment of 111 months after being found guilty of two counts of robbery that interferes with interstate commerce, in violation of 18 U.S.C. § 1951(a) (Count 1s & 2s); and use of a firearm during and in relation to a crime of violence, in violation of 18 U.S.C. § 924(c)(1) (Count 3s). Following briefing, the Third Circuit affirmed by judgment entered December 4, 2017. (Appendix “A”).

2. Pursuant to Rule 13.1, Mr. Young's petition for writ of certiorari is due on March 2, 2018.

3. Counsel has been unable to complete the petition given his workload on various other appeals to which he is assigned. These include *United States v. Keonna Thomas*, Third Circuit No. 17-2644, response brief and appendix due February 28, 2018 and *United States v. Kevin Reese*, Third Circuit No. 17-2484, opening brief and appendix due on March 9, 2018.

4. Counsel respectfully requests an additional 30 days in which to complete the petition for writ of certiorari.

WHEREFORE, for all the foregoing reasons of good cause, Brett G. Sweitzer, Assistant Federal Defender, Chief of Appeals, on behalf of the Federal Community Defender Office for the Eastern District of Pennsylvania, and on behalf of Michael Young, Petitioner, respectfully requests that this Court grant this motion for a 30-day extension of time for filing of a petition for writ of certiorari.

Respectfully submitted,



BRETT G. SWEITZER

Assistant Federal Defender, Chief of Appeals
Federal Community Defender Office
for the Eastern District of Pennsylvania
Suite 540 West, Curtis Center
601 Walnut Street
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CERTIFICATE OF SERVICE

I, Brett G. Sweitzer, Assistant Federal Defender, Chief of Appeals, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that I have served a copy of this *Application for Extension of Time for Filing Petition for Writ of Certiorari* upon Assistant United States Attorney Paul G. Shapiro, by first class U.S. mail to his office located at 615 Chestnut Street, Suite 1250, Philadelphia, PA, 19106 and upon the Office of the Solicitor General, by first class U.S. mail, at Department of Justice, Room 5614, 950 Pennsylvania Avenue, NW, Washington, DC 20530-0001.

A handwritten signature in black ink, appearing to be 'Brett G. Sweitzer', written over a horizontal line.

BRETT G. SWEITZER

Date: February 16, 2018

APPENDIX A

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 16-1728

UNITED STATES OF AMERICA

v.

MICHAEL YOUNG,

Appellant

On Appeal from the United States District Court
for the Eastern District of Pennsylvania
(D.C. No. 2-14-cr-00183-002)
District Judge: Honorable Michael M. Baylson

Submitted Under Third Circuit L.A.R. 34.1(a)
October 11, 2017

Before: HARDIMAN, SHWARTZ, and ROTH, *Circuit Judges*.

JUDGMENT

This cause came on to be considered on the record from the United States District Court for the Eastern District of Pennsylvania and was submitted pursuant to Third Circuit L.A.R. 34.1(a) on October 11, 2017. On consideration whereof, it is now hereby

ORDERED and ADJUDGED by this Court that the order of the United States District Court for the Eastern District of Pennsylvania entered on March 24, 2016, be and

the same is hereby AFFIRMED. All of the above in accordance with the Opinion of this Court.

No costs will be taxed.

ATTEST:

s/ Marcia M. Waldron
Clerk

Dated: December 4, 2017