

NO. _____

IN THE
SUPREME COURT OF THE UNITED STATES

ROLAND DONELL ROSS,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

On Petition for Writ of Certiorari to the
United States Court of Appeals for the Tenth Circuit

**APPLICATION FOR EXTENSION OF TIME TO FILE PETITION
FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT
OF APPEALS FOR THE TENTH CIRCUIT**

VIRGINIA L. GRADY
Federal Public Defender

HOWARD A. PINCUS
Assistant Federal Public Defender
Counsel of Record for Petitioner
633 17th Street, Suite 1000
Denver, Colorado 80202
(303) 294-7002

To the Honorable Sonia Sotomayor, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Tenth Circuit:

Petitioner Roland Donell Ross prays for a 60-day extension of time, to and including Monday, April 30, 2018, in which to file his petition for a writ of certiorari. In support of this request, counsel states as follows:

1. On November 29, 2017, the United States Court of Appeals for the Tenth Circuit affirmed the judgment of the district court in this case. A copy of that opinion is attached to this application.

2. Mr. Ross has ninety days from November 29 to petition for a writ of certiorari. Sup. Ct. R. 13.3. Ninety days from November 29 is February 27, 2018. This application is being filed at least ten days before February 27.

3. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

4. The requested extension is for sixty days. Within the last few weeks, I have filed the opening brief in United States v. Ejiofor, No. 17-6211 (10th Cir.) and the reply brief in United States v. Jimenez, No. 17-1190 (10th Cir.), and I am now working on the reply brief in United States v. Amador-

Flores, No. 17-2056 (10th Cir.), which is due on February 20. Because sixty days from February 27 is Saturday, April 28, the requested extension is until the next business day of Monday, April 30, 2018. Sup. Ct. R. 30.1.

5. During the requested extension period, I am also responsible for filing the opening brief in United States v. Nanez-Rivera, No. 17-1419 (10th Cir.) and the petition for writ of certiorari in United States v. Meridyth, No. 16-2037 (10th Cir.), and for arguing Jimenez, Amador-Flores and United States v. Rodriguez-Flores, No. 17-2039 (10th Cir.), before the Tenth Circuit. I also expect that, during the requested extension period, I will be responsible for filing the reply briefs in United States v. Russian, No. 17-3157 (10th Cir.) and United States v. Roman, No. 17-4084 (10th Cir.) (as the answer brief in Russian is due to be filed February 21 and the answer brief in Roman is due to be filed by February 26), as well as the opening brief in United States v. Duzyurt, No. 18-1039 (10th Cir.).

WHEREFORE Roland Donell Ross respectfully requests that an order be entered extending his time in which to petition for certiorari by sixty days, to and including Monday, April 30, 2018.

Respectfully submitted,

VIRGINIA L. GRADY
Federal Public Defender

/s/ Howard A. Pincus
HOWARD A. PINCUS
Assistant Federal Public Defender
Counsel of Record for Petitioner
633 Seventeenth St., Suite 1000
Denver, Colorado 80202
(303) 294-7002