

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

RONDALD W. PAUL,

Petitioner-Applicant

vs.

UNITED STATES OF AMERICA,

Respondent

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

To The Honorable Elena Kagan, Associate Justice, and Circuit Justice For The United States Court Of Appeals For The Sixth Circuit: In this case, Applicant Ronald W. Paul respectfully applies for a sixty (60) day extension of time, to and including May 4, 2018, within which to file a petition for writ of certiorari. In support of this application, Mr. Paul states:

1. On December 11, 2017, the United States Court of Appeals for the Sixth Circuit affirmed Mr. Paul's conviction for failing to register under the Sex Offender Registration and Notification Act, 18 U.S.C. § 2250(a) ("SORNA").

2. Mr. Paul presently has until March 12, 2018, to file a petition for writ of certiorari. *See* U.S.S.Ct.R. 13.1.

3. Under Rule 13.5, this Court may extend the time for seeking certiorari for up to sixty (60) additional days.

4. Although counsel has begun the process of researching and preparing a petition for writ of certiorari, counsel will require additional time to do so, given their simultaneous obligations in other cases.

5. Mr. Paul's case presents a highly unusual case in which the government has prosecuted Mr. Paul for failing to register within his *state* registration system, despite the fact that he had a valid state-court judgment relieving him of the duty to register in that very system. *See United State v. Kebodeaux*, 570 U.S. 387, 398 (2013) (“[A]s far as we can tell, while SORNA punishes violations of its requirements (instead of violations of state law), the Federal government has prosecuted a sex offender for violating SORNA only when that offender also violated state-registration requirements.”).

6. Today, this Court granted a writ of certiorari in the case of *Gundy v. United States*, No. 17-6086 (March 5, 2018). Mr. Paul understands this case to address whether Congress violated the non-delegation doctrine by granting the Attorney General authority to decide whether SORNA applies to pre-Act offenders. Counsel needs additional time to research this question, determine whether it applies to Mr. Paul (a pre-Act offender), and incorporate any related arguments into his petition for a writ of certiorari.

CONCLUSION

Mr. Paul respectfully requests that Your Honor grant a sixty (60) day extension of time, to and including May 4, 2018, within which to file a petition for writ of certiorari.

Respectfully Submitted,

s/ Isaiah S. Gant

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CERTIFICATE OF SERVICE

I certify that a copy of this application was served, *via electronic mail*, upon counsel for Respondent, Sarah Carran Daughtrey, Assistant U.S. Attorney, Office of the U.S. Attorney, 110 Ninth Avenue South, Suite A-961, Nashville, TN 37203, this the 5th day of March, 2018.

s/ Isaiah S. Gant

Isaiah S. Gant
Assistant Federal Public Defenders