
No.

IN THE SUPREME COURT OF THE UNITED STATES
OCTOBER TERM 2018

RICK E. BROWN,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

**APPLICATION FOR EXTENSION OF TIME WITHIN WHICH TO FILE
PETITION FOR WRIT OF CERTIORARI**

To the Honorable Elena Kagan, Associate Justice of the Supreme Court
and Circuit Justice for the Seventh Circuit:

The Petitioner, RICK E. BROWN, respectfully requests, pursuant to
Sup. Ct. R. 13.5 and 30, the issuance of an order extending the time for filing
a petition for writ of certiorari from its present due date of April 19, 2018 to
May 21, 2018. In support of this application, petitioner states the following:

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

2. The Federal Defender Program was appointed to represent Mr. Brown pursuant to the Criminal Justice Act of 1964 (18 U.S.C. §3006A) on October 29, 2013.

3. The final order of the Court of Appeals for the Seventh Circuit in this case is reported at 880 F.3d 399 (7th Cir. 2018) and is attached to this motion.

4. The judgment sought to be reviewed was entered by the Seventh Circuit on January 19, 2018, and no petition for rehearing was filed.

5. This is the first extension sought in this case.

6. Petitioner's counsel is requesting an extension of time because she has not had adequate opportunity to develop the petitioner's issues for this Court due to the unusually large number of new attorneys and administrative staff hired by the Federal Defender Program in Fiscal Year 2018, which significantly increased counsel's supervisory responsibilities during this period of time. These added responsibilities make it difficult for counsel to write a meaningful petition for a writ of certiorari by April 19, 2018.

WHEREFORE, it is respectfully requested that an extension of time to file a petition for writ of certiorari be granted from the present due date of April 19, 2018 to May 21, 2018.

Dated April 9, 2018, at Chicago, Illinois.

Respectfully submitted,

Federal Defender Program
Carol A. Brook
Executive Director

By: s/Carol A. Brook
Carol A. Brook
Counsel of Record
For the Petitioner

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