

No. _____

**In The
Supreme Court of the United States**

MILADIS SALGADO,
Applicant,

v.

UNITED STATES OF AMERICA,
Respondent.

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

To the Honorable Clarence Thomas
Associate Justice of the United States Supreme Court
and Circuit Justice for the Eleventh Circuit

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**Counsel of Record*

Counsel for Applicant/Petitioner

To the Honorable Clarence Thomas, Associate Justice for the United States Supreme Court and Circuit Justice for the Eleventh Circuit:

Petitioner Miladis Salgado respectfully requests, under Supreme Court Rule 13.5, that the time to file a Petition for a Writ of Certiorari be extended for 45 days, up to and including November 21, 2019.

On July 8, 2019, the United States Court of Appeals for the Eleventh Circuit entered an opinion and judgment affirming the district court's denial of Petitioner's claim that she was a "substantially prevailing" party under the Civil Asset Forfeiture Reform Act's attorneys' fees provision, even though she successfully obtained the full return of the money seized from her and obtained judicial relief preventing any future forfeiture lawsuit against the money. The Eleventh Circuit's opinion also affirmed the district court's decision to enter the dismissal as a voluntary dismissal without prejudice, instead of with prejudice, during the summary judgment stage and approximately two years after Petitioner's money was seized.

The United States Supreme Court now has jurisdiction to review a Petition for a Writ of Certiorari under 28 U.S.C. § 1254(1) and Supreme Court Rule 10. The Petition for a Writ of Certiorari is presently due on October 7, 2019. Petitioner files this Application at least ten days before that Date. *See S. Ct. R. 13.5.*

REASONS FOR GRANTING AN EXTENSION OF TIME

The time to file a Petition for a Writ of Certiorari should be extended for 45 days for the following reasons:

1. Lead counsel for Petitioner, Justin M. Pearson, of the public interest law firm the Institute for Justice, was recently retained by Petitioner. Neither Attorney Pearson nor the Institute was involved in this litigation at the district or circuit courts.

2. Although Attorney Pearson and the Institute have substantial experience with the Civil Asset Forfeiture Reform Act's provision at issue in this case, an extension of time is needed to become fully immersed in this case's record and to give the petition the time and attention the issues deserve. This is particularly true in light of pre-existing scheduling conflicts for Attorney Pearson. In addition to Attorney Pearson's current caseload as a public interest lawyer, these conflicts include teaching a continuing legal education class in Puerto Rico on September 18, as well as giving talks at Duke University School of Law, the University of North Carolina School of Law, Ave Maria School of Law, and Stetson University College of Law, all previously scheduled for between now and the current deadline.

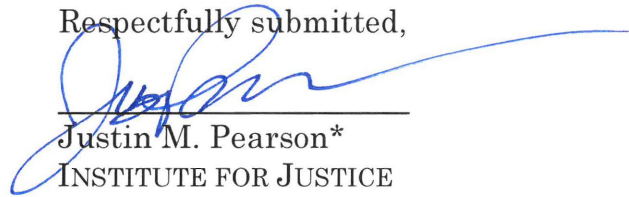
3. All of these prior commitments prevent Attorney Pearson from properly preparing a Petition for a Writ of Certiorari between now and October 7, 2019.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the time to file a Petition for a Writ of Certiorari in this matter be extended 45 days, up to and including November 21, 2019.

Dated: September 17th, 2019

Respectfully submitted,



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