
In The
SUPREME COURT OF THE UNITED STATES
October Term 2019

Bradley Beers,
Applicant/Petitioner,

v.

Attorney General of the United States of America, *et al.*,
Respondents.

Application for an Extension of Time Within
Which to File a Petition for a Writ of Certiorari to the
United States Court of Appeals for the Third Circuit

APPLICATION TO THE HONORABLE JUSTICE
SAMUEL ALITO AS CIRCUIT JUSTICE

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November 20, 2019

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APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Bradley Beers hereby requests a 60-day extension of time within which to file a petition for a writ of certiorari to February 8, 2019 and including Monday, February 10, 2020 pursuant to Rule 30.1.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *Bradley Beers v. Attorney General of the United States, et al.*, No. 17-3010 (3d Cir. June 20, 2019) (attached as Exhibit 1). The Third Circuit Court of Appeals denied Applicant's petition for panel rehearing and rehearing en banc on September 11, 2019 (attached as Exhibit 2).

JURISDICTION

This Court will have jurisdiction over any timely filed petition for certiorari in this case pursuant to 28 U.S.C. § 1254(1). Under Rules 13.1, 13.3, and 30.1 of the Rules of this Court, a petition for a writ of certiorari was due to be filed on or before December 10, 2019. In accordance with Rule 13.5, this application is being filed more than 10 days in advance of the filing date for the petition for a writ of certiorari.

REASONS JUSTIFYING AN EXTENSION OF TIME

Applicant respectfully requests a 60-day extension of time within which to file a petition for a writ of certiorari seeking review of the decision of the Third Circuit Court of Appeals in this case, up to and including February 10, 2020.

1. Applicant has requested that the Northwestern University School of Law Supreme Court Practicum assist in the preparation of their petition. An

extension of time will permit the students the time necessary to complete a cogent and well-researched petition after the beginning of the academic calendar for spring 2020, which begins January 13, 2020.

2. The extension of time is also necessary because of the press of other client business. For example, in the coming months, the Northwestern Practicum has several overlapping commitments representing other clients in this Court, including petitions for writs of certiorari in *Clay v. United States*, No. 19A326, due December 5, 2019; and *Schmitt v. LaRose*, No. 19A518, due February 3, 2020. The Northwestern Practicum also has reply briefs in support of a petition for writ of certiorari in *Richards v. Donovan*, No. 19-55, due February 5, 2019; *Faircloth v. United States*, No. 19-6249, due December 30, 2019; *Vereen v. United States*, No. 19-6405, due December 12, 2019; *Ackies v. United States*, No. 19-6602, due December 30, and a reply brief on the merits in *Shular v. United States*, No. 18-6662, due December 20, 2019.

3. A 60-day extension for the Applicants would provide the Northwestern Practicum students sufficient time for research and drafting efforts per Applicant's request.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests that this Court grant an extension of 60 days, up to and including February 10, 2020, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,



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