

IN THE
SUPREME COURT OF THE UNITED STATES

No.

QUINTON SPINKS,

Applicant,

v.

UNITED STATES OF AMERICA,

Respondent.

Application to the Honorable Ketanji Brown Jackson for Extension of Time
to File a Petition for a Writ of Certiorari to the United States Court of Appeals for
the First Circuit

Application to the Honorable Associate Ketanji Brown Jackson as Circuit Justice

Eamonn R. C. Hart
ehart@brannlaw.com
Brann & Isaacson
113 Lisbon Street
PO Box 3070
Lewiston, ME 04243-3070
(207) 786-3566

May 31, 2023

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To the Honorable Ketanji Brown Jackson, Associate Justice of the Supreme
Court of the United States and Circuit Justice for the First Circuit:

Applicant, Quinton Spinks, through counsel, respectfully requests that the time
to file a Petition for a Writ of Certiorari in this matter be extended for sixty days up to
and including August 21, 2023. The Court of Appeals issued its opinion and judgment
on March 23, 2023. Absent an extension of time, the petition would be due on or

before June 21, 2023. This Application is being filed at least ten days before the due date, in accordance with S.Ct.R. 13.5. This Court has jurisdiction under 28 U.S.C. §1254(1).

Reasons Justifying an Extension of Time

Counsel respectfully requests a 60-day extension of time because:

1. Following the First Circuit's opinion, counsel and petitioner conferred, and counsel was of the understanding that Applicant did not intend to seek certiorari.
2. Undersigned counsel expected to receive written confirmation of that decision, but Applicant did not provide it.
3. Undersigned counsel did not seek discharge from the First Circuit because he was waiting for the aforementioned confirmation.
4. Subsequently, Applicant suggested to undersigned counsel that he was reconsidering the decision whether to seek *certiorari*.
5. If Applicant does choose to file a petition, whether through undersigned counsel or *pro se*, the remaining three weeks on the present time to petition are not adequate to complete and file it, particularly if Applicant chooses to proceed *pro se*.

For the reasons expressed above, Quinton Spinks, through present counsel, respectfully requests that this Court grant him a 60-day extension to file a petition for a writ of certiorari up to and including August 21, 2023.

Dated: May 31, 2023

Respectfully submitted,

/s/ Eamonn R. C. Hart

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ehart@brannlaw.com

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Counsel for Applicant