

Case No.

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**IN THE  
SUPREME COURT OF THE UNITED STATES**

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**Amanda Lyn Walker,**  
*Applicant/Petitioner,*

**v.**

**United States of America,**  
*Respondent.*

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**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 Tenth Circuit**

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**APPLICATION TO THE HONORABLE  
JUSTICE NEIL GORSUCH AS CIRCUIT  
JUSTICE**

Katayoun Azizpour Donnelly  
*Member of the Tenth Circuit's CJA  
Appellate Panel*  
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October 10, 2023  
**Attorney for Applicant/Petitioner**

## **APPLICATION FOR AN EXTENSION OF TIME**

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Amanda Walker hereby requests a 60-day extension of time, up to and including December 22, 2023, within which to file a petition for a writ of certiorari.

## **JUDGMENT FOR WHICH REVIEW IS SOUGHT**

The judgment for which review is sought is *United States v. Walker*, No. 22-5005 (July 24, 2023) (attached as Exhibit 1).

## **JURISDICTION**

This Court has 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 is due to be filed on or before October 23, 2023. In accordance with Rule 13.5, this application is being filed 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 (until December 22, 2023) within which to file a petition for a writ of certiorari seeking review of the United States Court of Appeals for the Tenth Circuit in this case. The extension of time is necessary because of the press of other client business.

1. Since the issuance of the opinion by the Tenth Circuit on July 24, 2023, the undersigned counsel has, among other things, been responsible for drafting an opening brief in *Ngo v. Azar*, Case No. 2023CA191 (Colorado Court of Appeals “COA,” filed July 20, 2023), a reply brief in *Ngo v. Azar*, Case No. 2023SC427 (Colorado Supreme Court, filed July 17, 2023),

a reply brief in *Anzalone v. Board of Trustees*, Case No. 2022CA002181 (COA, filed Aug. 19, 2023), an expedited opening brief in *In the Interest of A.N.R.*, Case No. 2023CA1258 (COA, filed Sep. 13, 2023), a reply brief in *United States v. Vontress*, Case No. 22-3119 (10<sup>th</sup> Cir., filed Sep. 27, 2023); and a petition for writ of certiorari in *In Interest of S.M.* (Colorado Supreme Court, filed Oct. 5, 2023).

2. In the next few weeks, the undersigned counsel, among other things, is responsible for filing opening briefs in *Ngo v. Azar*, Case No. 2023CA659 (COA, due October 24, 2023); an expedited reply brief in *In the Interest of A.N.R.*, Case No. 2023CA1258 (COA, due Oct. 25, 2023); a response to a motion to enforce plea agreement in *United States v. Calzada*, Case No. 23-2126 (10<sup>th</sup> Cir., Nov. 6, 2023); an oral argument in *United States v. Vontress*, Case No. 22-3119 (10<sup>th</sup> Cir., Nov. 15, 2023); a reply brief in *Ngo v. Azar*, Case No. 2023CA191 (COA, due Nov. 16, 2023); and an opening brief in *United States v. Crespín*, Case No. 23-2111 (10<sup>th</sup> Cir., due Nov. 16, 2023).

3. Ms. Walker has conferred with counsel for the government. The government does not object.

4. A 60-day extension for the Applicant would allow the undersigned counsel the time necessary to effectively contribute to all open matters, including Applicant's petition.

### CONCLUSION

For the foregoing reasons, Applicant respectfully requests that this Court grant an extension of 60 days, up to and including December 22, 2023, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,

/s/ Katayoun A. Donnelly  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 10th day of October 2023, a true and correct copy of the foregoing was filed with the Court and served electronically on the following:

Chantelle Dial  
Assistant United States Attorney  
Tribal Liaison  
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Tulsa, Oklahoma 74119

/s/ Katayoun A. Donnelly  
Katayoun A. Donnelly