
IN THE SUPREME COURT OF THE UNITED STATES

No. _____

REYMUNDO ARREDONDO,
Petitioners,
v.

UNITED STATES OF AMERICA,
Respondent.

**Application to the Honorable Elena Kagan for Extension of Time
to File a Petition for a Writ of Certiorari
to the United States Court of Appeals for the Ninth Circuit**

Application to the Honorable Associate Justice Kagan as Circuit Justice

April 17, 2025

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Attorneys for Petitioner

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To the Honorable Elena Kagan, Associate Justice of the Supreme Court for
the United States and Circuit Justice for the Ninth Circuit:

Petitioner, Reymundo Arredondo, through counsel, respectfully requests that
the time to file a petition for a Writ of Certiorari in this matter be extended for
thirty days up to and including May 30, 2025. Petitioners seek review of the Ninth
Circuit's judgment in *United States v. Arredondo*, No. 22-50132, 2024 WL 4490606
(9th Cir. Oct. 15, 2024). The Court of Appeals denied a petition for rehearing or

rehearing en banc on January 30, 2025. Absent an extension of time, the petition would be due on or before April 30, 2025. Both the opinion and the order denying en banc rehearing are attached to this motion, and this application is being filed at least ten days before the due date, all in accordance with S. Ct. R. 13.5. This Court has jurisdiction under 28 U.S.C. § 1257.

Reasons Justifying an Extension of Time

Counsel respectfully requests a 30-day extension of time because:

1. Additional time is needed so that counsel can prepare the petition for certiorari. Counsel is an Appellate Attorney at Federal Defenders of San Diego, Inc., a community defender organization. As a public defender, counsel carries a significant appellate case load. Accordingly, over the last 90 days, counsel filed a petition for certiorari in this court; three Ninth Circuit opening briefs; a Ninth Circuit reply brief; and a D.C. Circuit amicus brief. Counsel also had oral argument in the Ninth Circuit. And counsel took one week of leave. The clients for whom counsel filed briefs are all either in custody or serving terms of supervised release, meaning that delay could prejudice them. In contrast, Mr. Arredondo's custodial and supervised release sentences have finished.

2. Over the next two weeks, counsel must reply to the government's response to a petition for certiorari. The case involves a complex Second Amendment issue, which spawned over 100 pages of opinions and separate writings during the merits and petition for en banc rehearing phases. Counsel therefore must prioritize finishing the reply before the distribution date.

3. Thus, counsel for petitioner will not be able to turn to this petition for certiorari until after April 30. The requested extension will give counsel enough time to prepare and file the petition.

4. Additional time is not sought for the purpose of delay, but rather, to provide effective assistance of counsel to petitioners.

For the reasons expressed above, Reymundo Arredondo, through counsel, respectfully requests that this Court grant a thirty-day extension to file a petition for a writ of certiorari up to and including May 30, 2025.

Respectfully submitted,

Date: April 17, 2025

s/ Katie Hurrelbrink
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