

No. 24A-____

IN THE
Supreme Court of the United States

SHEN ZHEN NEW WORLD I, LLC,

Applicant,

v.

UNITED STATES OF AMERICA,

Respondent.

**APPLICATION FOR AN EXTENSION OF TIME
TO FILE A PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

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

1. Pursuant to Supreme Court Rules 13.5, 22, and 30, Applicant Shen Zhen New World I, LLC (“SZNW”),¹ respectfully request a 59-day extension of time, up to and including February 7, 2024, to file a petition for a writ of certiorari to the United States Court of Appeals for the Ninth Circuit, seeking review of that court’s September 11, 2024, decision in *United States v. Shen Zhen New World I, LLC*, No. 23-972, 115 F.4th 1167 (9th Cir. 2024). The decision below is attached as Appendix A. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254.

¹ SZNW states that it is wholly owned, through a series of intermediaries, by Shenzhen New World Group, Co. Ltd., a non-public Chinese corporation.

2. The time to file a petition for a writ of certiorari will otherwise expire on December 10, 2024. This Application is timely because it has been filed on November 19, 2024, more than ten days prior to the date on which the time for filing is due to expire.

3. Applicant has good cause for an extension of time. This petition involves complicated and important issues relating to the scope of the federal bribery laws. Given its experience and expertise in this area, Jones Day is well positioned to evaluate and prepare a petition that will assist this Court in reviewing the case and the issues presented. The quality of any petition would greatly benefit from an extension of time to allow Jones Day to further develop the arguments in this case and to complete the requisite research and writing.

WHEREFORE, Applicant respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for 59 days, to and including February 7, 2024.

November 19, 2024

Respectfully submitted,

/s/ Yaakov M. Roth
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