

No. 26A_____

IN THE SUPREME COURT OF THE UNITED STATES

TODD HAROLD COOPER,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

On Petition for Writ of Certiorari
to the
United States Court of Appeals for the Tenth Circuit

**Application for an Extension of Time to File a Petition for a Writ of
Certiorari**

Adam Mueller

Counsel of Record

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Attorneys for Petitioner Todd Harold

Cooper

Pursuant to United States Supreme Court Rule 13.5, Petitioner Todd Harold Cooper, through counsel, requests a sixty (60) day extension of time within which to file his Petition for a Writ of Certiorari in this Court, i.e., up to and including Monday, June 22, 2026. Sixty (60) days from the current deadline of April 22, 2026, is Sunday, June 21, so the deadline moves to Monday, June 22, under United States Supreme Court Rule 30.1.

In support of this Application, Mr. Cooper states:

1. Mr. Cooper seeks review of the decision of the United States Court of Appeals for the Tenth Circuit, which rejected his postconviction contention that the sentencing court unconstitutionally imposed a life term using the vague residual clause found in 18 U.S.C. § 3559(c)(2)(F)(ii).
2. The Tenth Circuit issued its published decision on November 18, 2025, which is attached as APPENDIX A. *See also* APPENDIX B (Judgment).
3. Mr. Cooper filed a timely petition for rehearing on December 23, 2025, which is attached as APPENDIX C.
4. The Tenth Circuit denied the rehearing petition on January 22, 2026. The denial order is attached as APPENDIX D.

5. The Tenth Circuit issued the mandate on January 30, 2026, which is attached as APPENDIX E.

6. Lead counsel for Mr. Cooper, Adam Mueller, is proceeding under an order of appointment pursuant to the Criminal Justice Act (CJA), which is attached as APPENDIX F.

7. Jacob B. McMahon is also serving as counsel to Mr. Cooper. He assisted with briefing below, and the Tenth Circuit permitted him to present oral argument, but Mr. McMahon is not separately appointed under the CJA. *See* APPENDIX G.

8. Currently, Mr. Cooper's time to petition this Court for a Writ of Certiorari expires on April 22, 2026—90 days from the Tenth Circuit's denial of rehearing. *See* United States Supreme Court Rule 13.3.

9. Pursuant to United States Supreme Court Rule 13.5, this Application is being filed more than ten days before April 22, 2026.

10. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

11. Counsel for Mr. Cooper request this extension due to their work on multiple Colorado-state-court criminal appeals, in addition to other matters.

Further, Mr. Mueller will present three oral arguments over the next two months,

in addition to drafting various opening and reply briefs in the Colorado Court of Appeals and the United States Court of Appeals for the Tenth Circuit. Mr. McMahon is also taking time off this spring to see family visiting internationally. Finally, Mr. Cooper is in federal custody in New York, while his attorneys are located in Colorado, and additional time is needed for counsel to coordinate and consult with their client.

12. Mr. Cooper has not previously applied to this Court for an extension of time to file a Petition for a Writ of Certiorari.

13. This Application is made in good faith and not for purposes of delay.

For these reasons, Mr. Cooper respectfully requests a sixty (60) day extension of time to file his Petition for a Writ of Certiorari in this Court.

Dated: March 16, 2026.

Respectfully submitted,

s/ Adam Mueller

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