

Case No.

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

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**Tyler Jay Mullins,  
*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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March 24, 2026  
**Attorney for Applicant/Petitioner**

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

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Tyler Jay Mullins hereby requests a 40-day extension of time, up to and including May 26, 2026, 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. Mullins*, No. 24-7003 (Jan. 16, 2026) (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 April 16, 2026. In accordance with Rule 13.5, this application is being filed 23 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 40-day extension of time (until May 26, 2026) 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 denial of the petition for rehearing by the Tenth Circuit on January 16, 2026, the undersigned counsel has, among other things, been responsible for drafting briefs in *United States v. Al-Bawi*, Case. No. 25-4065 (10th Cir.); *Adoption of A.E.S.*, Case No. 2022JA030015 (El Paso District Court and Colorado Court of Appeals, filed Dec. 30, 2025, Jan.

21&28, 2026); *Pellouchoud v. People*, Case No. 2025SC000758 (Colorado Supreme Court, filed Feb. 3, 2026); *United States v. Cooper*, Case. No. 25-7047 (10th Cir. filed Feb. 24, 2026); a Colorado Civil Rights Division matter (due March 24, 2026); *United States v. Wahhaj*, Case No. 23-2170 (10th Cir. due Apr. 17, 2026); and *Mathias v. Probation Dep. et al*, Case No. 2025CA2221 (Colorado Court of Appeals, due April 21, 2026).

2. Mr. Mullins has conferred with counsel for the government. The government does not object.

3. A 40-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 40 days, up to and including May 26, 2026, 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 24th day of March 2026, a true and correct copy of the foregoing was filed with the Court and served electronically on the following:

Patrick M. Flanigan  
Assistant United States Attorney  
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/s/ Katayoun A. Donnelly  
Katayoun A. Donnelly