

CASE NO. _____
SUPREME COURT OF THE UNITED STATES

Anthony Madison,)
)
 Petitioner,)
)
 v.)
)
 United States of America,)
)
 Respondent.)

Application to Justice Kavanaugh for Additional Time to File a
Petition for a Writ of Certiorari to the Eighth Circuit Court of Appeals

Submitted on Behalf of Petitioner

Submitted By:

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Attorney for Petitioner

To Justice Brett M. Kavanaugh:

Petitioner Anthony Madison, through appointed counsel Rachel Korenblat, requests an additional 60 days in which to file a petition in this Court seeking certiorari to the Eighth Circuit Court of Appeals. Specifically, he seeks an extension through July 6, 2026.

Petitioner makes this request under Supreme Court Rule 13.5.

Jurisdiction

Petitioner is preparing to request review of the judgment issued by the Eighth Circuit Court of Appeals on February 6, 2026, affirming the revocation of his supervised release and subsequent punishment. *See* App. 1 – App. 2 (Eighth Cir. Opinion). Mr. Madison did not seek rehearing or rehearing en banc.

The deadline for filing a petition in this case is May 7, 2026. Petitioner files his request at least ten days before the date the petition is currently due. Supreme Court Rule 13.5.

Reasons for Application

Mr. Madison was on federal supervised release when the State of Missouri alleged that he committed two state crimes. A state grand jury refused to return a true bill. Yet the federal government sought to revoke Mr. Madison's supervision based solely on those alleged crimes.

At Mr. Madison's revocation hearing, a federal judge denied his request for a jury trial and reasonable doubt standard. It then heard evidence, found him guilty by a preponderance, and sentenced him to a new prison term and fresh supervision.

Mr. Madison appealed, arguing that this revocation violated his rights under the Fifth Amendment, the Sixth Amendment, and Article III, § 2. The Eighth Circuit affirmed under its existing precedent. Mr. Madison now intends to seek review on this important and timely issue. *See Burnett v. United States*, 607 U.S. ____, 146 S. Ct. 875 (2026) (Gorsuch, J., dissenting

from the denial of certiorari) (urging the Court to grant review and take up a meaningfully similar Sixth Amendment issue “soon”).

Undersigned counsel is responsible for a significant criminal caseload in the Eastern District of Missouri and has been required to meet several other deadlines between the Eighth Circuit’s decision and the current due date. These demands on counsel’s time will prevent counsel from preparing a competent and concise petition by the current deadline.

Wherefore, Petitioner requests additional time to file a Petition for a Writ of Certiorari, up to and including July 6, 2026.

Dated: April 20, 2026

Respectfully submitted,

/s/ Rachel Korenblat
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