

Application No. _____

IN THE SUPREME COURT OF THE UNITED STATES

To the Honorable Amy Coney Barrett,
Associate Justice of the Supreme Court of the United States
and Circuit Justice for the Seventh Circuit:

**APPLICATION OF PETITIONER JOYCE McGEE
FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE
A PETITION FOR A WRIT OF CERTIORARI
TO THE APPELLATE COURT OF ILLINOIS,
FIRST JUDICIAL DISTRICT**

Petitioner Joyce McGee, proceeding pro se and in forma pauperis, respectfully applies to this Court for an order extending the time within which to file her Petition for a Writ of Certiorari. Unless an extension is granted, the deadline for filing the petition will be **April 28, 2026**. Petitioner requests an extension of sixty (60) days, to and including **June 27, 2026**. This application is being submitted as close to ten days before the deadline as institutional constraints permit, and is filed in good faith before the original deadline expires.

I. BASIS FOR JURISDICTION

This Court has jurisdiction to review the judgment of the Appellate Court of Illinois, First Judicial District, pursuant to **28 U.S.C. § 1257(a)**. The judgment of the state court of last resort was entered

by the Illinois Appellate Court, First Judicial District, in **People v. McGee**, No. 2025 IL App (1st) 240445. A Petition for Leave to Appeal to the Illinois Supreme Court was denied. The petition for certiorari will assert that the sentence imposed upon Petitioner violates the Eighth Amendment to the United States Constitution as interpreted in **Miller v. Alabama**, 567 U.S. 460 (2012), and **Montgomery v. Louisiana**, 577 U.S. 190 (2016).

II. JUDGMENT SOUGHT TO BE REVIEWED

Petitioner seeks review of the judgment entered by the Appellate Court of Illinois, First Judicial District, in **People v. Joyce McGee**, No. 2025 IL App (1st) 240445, affirming the trial court's denial of post-conviction relief. Petitioner was convicted under an accountability theory in Cook County Case No. 06 CR 0176603. She was eighteen years old at the time of the offense. She was not the shooter. She was sentenced on December 17, 2009 to forty years' imprisonment.

A copy of the opinion is not attached to this application. The reason for its absence is itself the cause for this extension request, as set forth in Section III below.

III. GOOD CAUSE FOR EXTENSION

A. Petitioner Is Incarcerated and Cannot Access the Required Appellate Opinion.

Joyce McGee is currently confined at Logan Correctional Center in Lincoln, Illinois (IDOC #R85454). She is proceeding without counsel. Rule 13.5 requires this application to include a copy of the opinion sought to be reviewed. Ms. McGee cannot obtain that copy. The 2025 IL App (1st) 240445 opinion is available only through Logan's prison law library. Institutional scheduling constraints, limited access hours, and the time required for legal documents to move through prison

channels have made it impossible for Ms. McGee to obtain the opinion and transmit it to an outside advocate before this application's deadline.

This is not delay. This is the daily reality of litigating from inside a correctional institution.

B. The Same Institutional Barriers Prevent Timely Filing of the Full Petition.

Preparation of a Petition for a Writ of Certiorari requires, at minimum, access to the appellate record, the opinion below, and legal research materials. For an incarcerated pro se petitioner, each of these requires law library access that must be scheduled, approved, and completed within the constraints of institutional operations. Ms. McGee has been diligently pursuing this access. She has not been idle. The barriers she faces are structural, not personal.

A sixty-day extension will allow Ms. McGee to obtain the opinion from the law library, transmit it to her outside advocate, complete the petition with the required appendices, and file a document that gives this Court a full and accurate record on which to act.

C. The Questions Presented Are Substantial and Warrant This Court's Consideration.

Ms. McGee's petition will present questions of constitutional significance that remain unresolved in the lower courts. She was eighteen years old, convicted under a theory of accountability, and was not the person who pulled the trigger. She received a forty-year sentence. The petition will argue that the Eighth Amendment's protections articulated in **Miller v. Alabama** and **Montgomery v. Louisiana** apply to her circumstances, and that the state court's refusal to extend those protections to accountability-theory convictions conflicts with decisions in other jurisdictions and with the logic of this Court's own precedents.

These are not frivolous questions. They go to the heart of whether the Constitution's prohibition on cruel and unusual punishment reaches the right people — not just the person who fired the gun, but the eighteen-year-old standing nearby whose life was nonetheless measured out in decades.

IV. REQUEST

For the foregoing reasons, Petitioner Joyce McGee respectfully requests that this Court grant an extension of sixty (60) days, to and including **June 27, 2026**, within which to file her Petition for a Writ of Certiorari.

Respectfully submitted,

Joyce McGee
Petitioner, Pro Se
IDOC #R85454
Logan Correctional Center
1096 1350th Street
Lincoln, Illinois 62656

Dated: April ~~16~~, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this date, a copy of the foregoing Application for Extension of Time has been served upon the Attorney General of the State of Illinois, the respondent in this matter, by first-class United States mail, postage prepaid, addressed to:

Office of the Attorney General
State of Illinois
100 West Randolph Street
Chicago, Illinois 60601

Joyce McGee
Petitioner, Pro Se