

In the Supreme Court of the United States

GEORGE ANIBOWEI,

Applicant,

v.

TODD BLANCHE, ACTING ATTORNEY GENERAL, ET AL.

**RENEWED APPLICATION FOR AN EXTENSION OF TIME TO FILE
A PETITION FOR A WRIT OF CERTIORARI**

To the Honorable Samuel A. Alito, Jr., Associate Justice of the Supreme Court of the United States and Circuit Justice for the United States Court of Appeals for the Fifth Circuit:

1. Pursuant to Supreme Court Rule 13.5, Applicant George Anibowei respectfully requests a further 30-day extension of time, to and including August 17, 2026, within which to file a petition for a writ of certiorari. The United States Court of Appeals for the Fifth Circuit issued its opinion on November 19, 2025. A copy of the opinion was filed with Applicant's original application as Exhibit A. The Fifth Circuit denied Applicant's timely petition for rehearing en banc on March 20, 2026. A copy of that order was filed with Applicant's original application as Exhibit B. This Court's jurisdiction would be invoked under 28 U.S.C. § 1254(1).

2. Applicant's petition originally was due on June 18, 2026. On May 22, 2026, Applicant filed an application requesting a 60-day extension, to and including August 17,

2026. On June 3, 2026, Your Honor granted the application in part, extending the time to file to July 18, 2026. This renewed application is timely because it is filed more than 10 days before the current July 18, 2026 deadline. If granted, the total extension would remain within the 60-day limit in Rule 13.5.

3. This case seeks review of an exceptionally important question that has divided courts throughout the country: Whether the government’s Directives authorizing border agents to search the contents of electronic devices without warrants or suspicion violate the Fourth Amendment. The United States has itself sought certiorari on this Fourth Amendment question, Petition for Writ of Certiorari at 13, 22, *United States v. Cano* (No. 20-1043), and the panel below made clear that it is “squarely” presented, App. Ex. A at 4.

4. Good cause exists for the additional 30-day extension requested here. This case presents an important and recurring Fourth Amendment question that has divided the lower courts. The requested time is necessary to prepare a petition that will be of assistance to the Court, including by refining the question presented, coordinating with co-counsel and potential *amici*, and accounting for related developments in this Court’s Fourth Amendment docket.

5. In particular, since Applicant’s original application was filed, undersigned counsel has moved his appellate practice from Arnold & Porter to Trial Lawyers for Justice. That transition has required entering new engagement and co-counsel agreements, transferring case files, reestablishing administrative and filing systems, confirming engagements and responsibilities across pending matters, and coordinating this petition

with co-counsel, the client, and potential *amici*. Counsel also has substantial competing obligations in this Court and other federal courts, including other certiorari-stage matters, federal appellate deadlines, and confidential client matters. Those concrete demands have materially constrained the time available to complete the petition before the current July 18 deadline.

6. Additional time is also warranted because this Court has heard argument, but has not yet issued a decision, in *Chatrie v. United States*, No. 25-112, another Fourth Amendment case involving searches of modern digital data. This Court's decision in *Chatrie* may bear directly on the presentation of the question in this case. A short additional extension would allow Applicant to address *Chatrie* in the petition in an orderly way and would reduce the likelihood of supplemental briefing after filing.

7. The requested extension also accords with the ordinary administration of Rule 13.5 when concrete circumstances warrant additional time. In *Warden, Moshannon Valley Correctional Center v. Michelin*, No. 25A1300, the Solicitor General sought a further 30-day extension after receiving an initial extension, and Your Honor granted that application on June 22, 2026, extending the government's time to file a petition for a writ of certiorari from June 30, 2026, to July 30, 2026. Although each application turns on its own showing, that docket reflects that a further 30-day extension after an initial extension is an available and appropriate accommodation where circumstances justify it. The same limited accommodation is warranted here.

8. This request is made in good faith and not for purposes of delay. Respondents will not be prejudiced by the requested extension.

Wherefore, Applicant respectfully requests that the time to file a petition for a writ of certiorari be extended to and including August 17, 2026.

Dated: June 25, 2026

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew T. Tutt", with a horizontal line underneath.

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