

No. 25A\_\_

---

---

IN THE  
**Supreme Court of the United States**

---

JUAN MATTHEWS,  
*Applicant,*

v.

LOUISIANA,  
*Respondent.*

---

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

---

MICHAEL ADMIRAND  
SOUTHERN CENTER FOR  
HUMAN RIGHTS  
60 Walton Street NW  
Atlanta, GA 30303  
(404) 688-1202  
madmirand@schr.org

JO-ANN TAMILA SAGAR  
*Counsel of Record*  
HOGAN LOVELLS US LLP  
555 Thirteenth Street, NW  
Washington, D.C. 20004  
(202) 637-5600  
jo-ann.sagar@hoganlovells.com

*Counsel for Applicants*

June 4, 2026

*Additional counsel listed on inside cover*

MATTHEW SULLIVAN  
MELISSA JACOBS  
AIDAN COLEMAN  
LOREA MENDIGUREN  
STEVEN HIGGINS  
HOGAN LOVELLS US LLP  
555 Thirteenth Street, NW  
Washington, D.C. 20004

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

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

Pursuant to Rule 13.5 of the Rules of this Court and 28 U.S.C. § 2101(c), Applicant Juan Matthews respectfully requests a 30-day extension of time, to and including July 16, 2026, within which to file a petition for a writ of certiorari to review the judgment of the Supreme Court of Louisiana in this case.

In support of this request, Applicant states as follows:

1. The Supreme Court of Louisiana denied Mr. Matthews's writ application on March 18, 2026. *See* App.1a. Unless extended, the time to file a petition for a writ of certiorari will expire on June 16, 2026. *See* Sup. Ct. R. 13.1. This application is being filed more than ten days before that date. *See* Sup. Ct. R. 13.5. The jurisdiction of this Court would be invoked under 28 U.S.C. § 1257(a).

2. Mr. Matthews is a state prisoner in Louisiana. In 1992, Mr. Matthews was convicted of second-degree murder and sentenced to life imprisonment. App.16a.

3. The State's case against Mr. Matthews was thin. No murder weapon was recovered. Louisiana Supreme Court Writ Application at 8. No DNA or other forensic evidence tied Mr. Matthews to the crime. *Id.* And no motive was identified. *Id.* The prosecution instead rested on the testimony of three witnesses: Lloyd Martin (a close friend of the victim who, at the time of Mr. Matthews's trial, faced a potential life sentence in an unrelated case), ten-year-old Vanessa Henry, and twelve-year-old

Dominique Gibson. *Id.* at 7-8. Their testimony diverged on core facts, including the time of the shooting, the shooter's clothing, and the witnesses' respective locations. *Id.*

4. Over thirty years after the trial, Mr. Matthews discovered that the State withheld evidence that would have undermined the State's already-weak case. The State had evidence that an additional witness, Leroy Milton, described the fleeing perpetrator as approximately 40 years old; Mr. Matthews was only 21 at the time. App. 17a n.1. The State had evidence that Vanessa Henry testified falsely when she claimed to have lived across the street from the shooting and when she claimed to have witnessed the shooting from her front porch. Louisiana Supreme Court Writ Application at 7. And the State had records showing that Natha Lee Rubin, who placed an emergency call and observed a man fleeing the scene, was presented with a photo lineup shortly after the shooting that included Mr. Matthews, but she did not identify him. App. 18a.

5. Upon discovering this evidence, Mr. Matthews filed an application for postconviction relief in the Orleans Parish Criminal District Court, asserting violations of his due process rights under *Brady v. Maryland*, 373 U.S. 83 (1963).

6. As the trial court acknowledged, it is "undisputed" that the State failed to produce all the exculpatory discovery requested by Mr. Matthews's counsel before trial. App. 17a. The trial court nevertheless denied relief in a two-page decision. The court reasoned that the trial evidence was sufficient to support Mr. Matthews's conviction, without considering how the suppressed evidence would have affected the

strength of the prosecution’s case or the reliability of the verdict. App. 18a-19a. That outcome runs counter to this Court’s precedent. *See Kyles v. Whitley*, 514 U.S. 419, 434 (1995) (noting that the *Brady* materiality inquiry is not “a sufficiency of the evidence test”).

7. The Louisiana appellate courts did not correct that error. The Louisiana Fourth Circuit Court of Appeals granted review but denied relief. One judge dissented, observing that the postconviction court had “reduced its materiality analysis to a sufficiency of evidence test.” App. 14a. The Louisiana Supreme Court then declined to grant review of the decision, although one justice would have docketed the case for full consideration on the merits. App. 1a-2a.

8. Mr. Matthews intends to file a certiorari petition seeking this Court’s review of that decision, which is at odds with this Court’s precedents. Mr. Matthews’s case is an outlier in this country, but it is not an outlier in the Louisiana courts. Louisiana courts have repeatedly misapplied *Brady* in similar circumstances. *See Brown v. Louisiana*, 143 S. Ct. 886, 888 (2023) (Jackson, J., dissenting from denial of certiorari) (“We have repeatedly reversed lower courts—and Louisiana courts, in particular—for similar refusals to enforce the Fourteenth Amendment’s mandate that favorable and material evidence in the government’s possession be disclosed to the defense before trial.”) (collecting cases); *Skinner v. Louisiana*, 146 S. Ct. 1000, 1009 n.4 (2026) (Sotomayor, J., dissenting) (recognizing the same).

9. Jo-Ann Tamila Sagar of Hogan Lovells US LLP, Washington, D.C., was recently brought onto the case for purposes of preparing a petition for a writ of

certiorari on behalf of Mr. Matthews in this Court. Good cause exists for the extension, as counsel was occupied in recent weeks with several emergency briefing deadlines in matters before this Court, including a response in opposition to a stay motion in *Allen, et al. v. Milligan, et al.*, No. 25A1314, filed on June 1; and a stay application and reply in support of a stay application in *Danco Laboratories v. Louisiana, et al.*, No. 25A1207, filed on May 2 and May 8. Counsel is also occupied with upcoming briefing deadlines for other matters, including a reply brief in *United States v. Franklin*, No. 25-3054 (D.C. Cir.), due on June 30; and an opening brief in *Ford Motor Company v. Mikhov*, No. 26-2317 (9th Cir.), due on July 2. This extension of time will allow counsel to research the relevant legal and factual issues and prepare a petition that comprehensively addresses the important question raised by the decision below.

10. For these reasons, Applicant respectfully requests that an order be entered extending the time to file a petition for certiorari to and including July 16, 2026.

Respectfully Submitted,

MICHAEL ADMIRAND  
SOUTHERN CENTER FOR  
HUMAN RIGHTS  
60 Walton Street NW  
Atlanta, GA 30303  
(404) 688-1202  
madmirand@schr.org

/s/ Jo-Ann Tamila Sagar  
JO-ANN TAMILA SAGAR  
*Counsel of Record*  
MATTHEW SULLIVAN  
MELISSA JACOBS  
AIDAN COLEMAN  
LOREA MENDIGUREN  
STEVEN HIGGINS  
HOGAN LOVELLS US LLP  
555 Thirteenth Street, NW  
Washington, D.C. 20004  
(202) 637-5600

jo-ann.sagar@hoganlovells.com

*Counsel for Applicants*

June 4, 2026