

No. \_\_\_\_\_

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**In the Supreme Court of the United States**

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JERONE TYRELL HOLMAN,  
*Applicant,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

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UNOPPOSED APPLICATION FOR AN EXTENSION OF TIME  
TO FILE A PETITION FOR A WRIT OF CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

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**APPLICATION TO THE HONORABLE  
CHIEF JUSTICE JOHN ROBERTS  
AS CIRCUIT JUSTICE**

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*Counsel for Applicant*

June 11, 2026

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**To the Honorable John Roberts, Chief Justice of the Supreme Court of the United States and Circuit Justice for the Fourth Circuit:**

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Jerone Holman requests an extension of time within which to file his petition for a writ of certiorari, up to and including Monday, August 24, 2026 (60 days). Respondent, the United States of America, does not object to this application.

**JUDGMENT FOR WHICH REVIEW IS SOUGHT**

Mr. Holman seeks review of the March 27, 2026 decision and judgment of the United States Court of Appeals for the Fourth Circuit in *United States v. Holman*, No. 25-4041 (attached as Exhibit 1).

**JURISDICTION**

The Court will have jurisdiction over any timely filed petition for certiorari in this case pursuant to 28 U.S.C. § 1254(1). The United States Court of Appeals for the Fourth Circuit issued its opinion on March 27, 2026. Ex. 1. Absent an extension of time, Mr. Holman’s petition for a writ of certiorari from this Court will be due on June 25, 2026. *See* Sup. Ct. R. 13.1. In accordance with Rule 13.5, this application is being filed at least 10 days in advance of the June 25, 2026 deadline.

**REASONS JUSTIFYING AN EXTENSION OF TIME**

“For good cause, a Justice may extend the time to file a petition for a writ of certiorari for a period not exceeding 60 days.” Sup. Ct. R. 13.5. A 60-day extension of the June 25, 2026 deadline would expire on Monday, August 24, 2026. Good cause

exists for the unopposed requested extension of time in this case for the following reasons:

1. This case presents two questions for the Court's consideration. The first asks whether 18 U.S.C. § 922(g)(1) violates the Second Amendment, either facially or as applied to Mr. Holman, and the second concerns the appropriate application and interpretation of United States Sentencing Guideline § 2K2.1(a)(3) and the related Guidelines Commentary.

2. The intersection of statutes regulating and criminalizing gun possession with the Second Amendment is an area this Court continues to address in various contexts. *See, e.g., New York State Rifle & Pistol Ass'n, Inc v. Bruen*, 597 U.S. 1 (2022); *United States v. Rahimi*, 602 U.S. 680 (2024). But the application of the Second Amendment to 18 U.S.C. § 922(g)(1) has not yet been answered. Mr. Holman plans to present precisely that question to the Court in his petition. In order to provide a fulsome and updated petition, an extension is needed for counsel to assess the implications of *United States v. Hemani*, No. 24-1234. *Hemani* was argued on March 2, 2026, and the Court's opinion has not yet been released. *Hemani*, which addressed a similar question in the context of 18 U.S.C. § 922(g)(3), will add to this Court's jurisprudence and will require a thorough analysis by the undersigned that requires more time than the pending June 25 deadline allows.

3. The second issue Mr. Holman intends to raise relates to the interpretation and appropriate application of U.S.S.G. § 2K2.1(a)(3). This question will involve an analysis of the text of that Guideline, as well as an evaluation of the

potentially applicable Commentary. The analysis implicates questions of deference to agency interpretations of regulations and carries significant consequences for interpretation of the Guidelines.

4. Further, Appellate counsel, who have been appointed to represent Mr. Holman under the Criminal Justice Act, have several obligations that will make it difficult to accomplish these tasks by the current deadline of June 25, 2026, including filings in the United States Court of Appeals for the Fourth Circuit between now and then.

5. Counsel for Mr. Holman have conferred with counsel for the government, Mr. Pousson, who has advised that he does not object to this requested 60-day extension.

6. This is Mr. Holman's first application for an extension of the deadline to file a petition for a writ of certiorari.

7. For these reasons, Mr. Holman respectfully requests that the due date for his petition for a writ of certiorari be extended by sixty days, to August 24, 2026, or until such earlier time as this Court deems just.

Respectfully submitted,

*/s/ Margaret McCall Reece*

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**CERTIFICATE OF SERVICE**

I, Margaret McCall Reece, hereby certify that I am a member of the Bar of this Court. I further certify that a copy of Applicant's Unopposed Application for an Extension of Time to File a Petition for a Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit was served this 10th of June, 2026, via electronic mail and U.S. mail, postage prepaid, on the following:

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June 11, 2026

/s/ Margaret McCall Reece  
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