

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

GLEN PRINCE,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

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

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

The Petitioner, Glen Prince, respectfully requests, pursuant to Sup. Ct. R. 13.5 and 30, a 30-day extension of time, to and including July 31, 2026, within which to file a petition for a writ of certiorari to review the judgment of the United States Court of Appeals for the Seventh Circuit in this case. In support of this application, petitioner states as follows:

1. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).
2. The opinion of the Court of Appeals for the Seventh Circuit in this case is reported at *United States v. Prince*, 171 F.4th 1009 (7th Cir. 2026) and is attached to this motion as Exhibit 1.

3. The judgment sought to be reviewed was entered on April 2, 2026.

4. Under Supreme Court Rules 13.1, 13.3, and 30.1, a petition for a writ of certiorari is currently due to be filed on or before July 1, 2026. This application has been filed at least 10 days before the date a petition would be due. *See* Sup. Ct. R. 13.5.

5. This case concerns the constitutionality of the federal felon-in-possession law, 18 U.S.C. § 922(g)(1). Mr. Prince was charged by indictment with one count of violating that statute, and the district court dismissed Mr. Prince's indictment as unconstitutional before trial. *See United States v. Prince*, 700 F. Supp. 3d 663 (N.D. Ill. 2023).

6. The Seventh Circuit reversed the judgment of the district court. The court misdescribed this Court's holding in *United States v. Rahimi*, 602 U.S. 680 (2024), as generally recasting the Second Amendment test to be more "more risk-centric," rather than articulating one aspect of the historical tradition that applied in that case. The court did not engage in a historical inquiry or do any analysis to determine whether the tradition from *Rahimi* had any application to § 922(g)(1). Rather, the court of appeals cited generally to the positions of the other circuits for support, even though those circuits disagree with each other as to the scope and weight of the different historical traditions and their resulting impact with respect to § 922(g)(1).

7. The issues upon which Petitioner will be seeking review involve complex questions of constitutional law and the nation's historical tradition of firearms regulation. Petitioner's counsel has not had adequate opportunity to develop these issues for this Court because he had substantial professional responsibilities between the decision below and July 1, 2026. The Seventh Circuit stayed many cases on appeal raising similar issues pending the resolution of this matter, including four cases where Applicant's counsel is counsel of record. When *Prince* was decided, each case was unstayed and required further proceedings and consultation with clients in light of *Prince* and a related case, *United States v. Watson*, 171 F.4th 1012 (7th Cir. 2026); these cases have now been set for briefing in the court of appeals.

8. Petitioner's counsel has also had substantial professional obligations in the district court, including preparing for a sentencing hearing in which the government intends to attempt to prove an attempted murder in an evidentiary hearing; preparing for a jury trial scheduled to proceed on May 11, 2026, that was continued only two days before; and working to prepare and negotiate to resolve a case scheduled for trial in July.

9. Further, this Court is currently deliberating on a Second Amendment challenge to another subsection of § 922, 18 U.S.C. § 922(g)(3), in *United States v. Hemani*, no. 24-1234. This Court's disposition of that matter

will assist Petitioner's counsel in crafting a succinct certiorari petition for this Court.

Wherefore, good cause being shown, Petitioner Glen Prince respectfully requests that this Court grant an extension of time within which to file a petition for a writ of certiorari from July 1, 2026, to and including July 31, 2026.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM
John F. Murphy
Executive Director

By: /s/ Jack Corfman
Jack Corfman
Counsel of Record
Federal Defender Program
55 East Monroe Street, Suite 2800
Chicago, IL 60603
(312) 621-8342

June 17, 2026