

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

Seventh Circuit Appeal No. 23-2427

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IN THE  
SUPREME COURT OF THE UNITED STATES

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MARCUS DIXON,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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

**EXHIBIT A – AFFIDAVIT OF COUNSEL**

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**AFFIDAVIT OF ADAM STEVENSON  
IN SUPPORT OF APPLICATION FOR EXTENSION OF TIME TO  
PETITION FOR A WRIT OF CERTIORARI**

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I submit this affidavit in support of Marcus Dixon’s Application for an  
Extension of Time to Petition for a Writ of Certiorari:

1. On August 22, 2023, pursuant to the Criminal Justice Act of 1964, the Court of Appeals for the Seventh Circuit (“Court of Appeals”) appointed me to represent Marcus Dixon, in his direct appeal arising out of the District Court for the Central District of Illinois (“District Court”). (Exhibit B.) Mr. Dixon is in federal custody at USP Big Sandy. His projected release date is currently July 9, 2040.
2. On May 7, 2025, the Court of Appeals issued its opinion affirming Mr. Dixon’s conviction. (Exhibit C.)

3. In its opinion, the Court of Appeals held that the district court properly denied Mr. Dixon's motion to suppress the warrantless searches of various places and property pursuant to his supervised release conditions. (Exhibit C.)
4. There is at a minimum a reasonable prospect that this Court will grant *certiorari* and potentially reverse the decision of the Court of Appeals. The issue in this case involves whether a defendant has at least limited standing under the Fourth Amendment to challenge the search of property pursuant to search conditions that allow for searches of "his" property, even though he may not otherwise have more traditional rights to challenge the search.
5. Counsel has in the past been, and currently is, engaged in other litigation currently in ongoing briefing. This work includes briefing in *United States v. Ieliot Jackson*, Seventh Circuit Appeal No. 24-2343 and *United States v. Aundre Allen*, Seventh Circuit Appeal No. 24-2541. Both cases are stayed pending the outcome of *United States v. Prince*, Seventh Circuit Appeal No. 23-3155, a fully briefed and argued case challenging the constitutionality of 18 U.S.C. § 922(g)(1). Depending on the outcome *Prince* and subsequent filings, counsel anticipates further filings being necessary. These cases are in addition to several other legal matters while running a federal postconviction law school clinic and

directing the University of Wisconsin Law School's prison-based clinical programs.

6. In addition to other casework, counsel is not a full-time practicing attorney, and is instead the director of a legal clinic at the University of Wisconsin Law School. Due to the educational nature and structure of the project and counsel's work directing it, counsel has additional time commitments in addition to, and apart from, litigation. Though not itself a basis for an extension given the general time commitments of members of the bar, in combination with the casework listed above, these matters demonstrate the need for additional time to effectively represent Mr. Dixon's interests before this Court.
7. Mr. Dixon is aware of the possibility that counsel would need to file such a motion for an extension of time to petition the Court. Mr. Dixon has no objections to requesting a 60-day extension.
8. There is no prejudice to the respondent by the granting of this motion, which would serve justice and the public interest.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this \_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
Adam Stevenson  
Clinical Professor  
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Attorney for Petitioner,  
MARCUS DIXON

State of Wisconsin  
County of Dane

This document was signed before me on \_\_\_\_\_ by \_\_\_\_\_

NOTARY STAMP/SEAL

\_\_\_\_\_  
Name:  
Notary Expiration Date: