

No. 25-_____

IN THE
Supreme Court of the United States

JAMES ANTHONY BRIAN MORELOCK,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

**APPLICATION FOR AN EXTENSION OF TIME TO
FILE PETITION FOR WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS FOR
THE ELEVENTH CIRCUIT**

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TO THE HONORABLE CLARENCE THOMAS,
Associate Justice of the Supreme Court of the United
States, and Circuit Justice for the United States Court of
Appeals for the Eleventh Circuit:

The Petitioner, JAMES ANTHONY BRIAN MORELOCK, through undersigned counsel and pursuant to 28 U.S.C. § 2101 and Supreme Court Rules 13.5 and 30.2, respectfully requests an extension of time of sixty (60) days to file his Petition for Writ of Certiorari in this Court. Mr. Morelock will seek review of the decision of the United

States Court of Appeals for the Eleventh Circuit entered on January 10, 2025. The same court denied his petition for rehearing en banc on July 8, 2025. Mr. Morelock invokes the jurisdiction of this Court pursuant to 28 U.S.C. § 1254. His time to file a Petition for Writ of Certiorari will expire on October 6, 2025. Mr. Morelock makes this application for an extension more than ten (10) days before the petition's original due date. This is his first request for an extension of time.

We ask the Court to extend the deadline because Mr. Morelock will raise two issues, one involving historical research into Founding-era practice and the other a thorny categorical approach question that has divided the circuit courts. More time than usual is needed to properly present these issues to the Court. Moreover, counsel has deadlines and obligations in other cases in September and October in the Northern District of Georgia, which may interfere with his preparation of Mr. Morelock's certiorari petition.

CONCLUSION

Mr. Morelock asks this Court to extend the time to file the Petition for Writ of Certiorari by sixty (60) days, until and including December 5, 2025.

Respectfully Submitted,

JOE AUSTIN

Counsel of Record

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September 22, 2025