

NO. _____

IN THE
SUPREME COURT OF THE UNITED STATES

GABRIEL BROWN,
PETITIONER-APPELLANT,

v.

UNITED STATES OF AMERICA,
RESPONDENT-APPELLEE.

**APPLICATION FOR EXTENSION OF TIME IN WHICH TO FILE PETITION
FOR WRIT OF CERTIORARI FROM THE JUDGMENT OF THE UNITED
STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT**

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

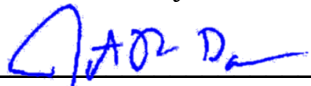
Petitioner, by his attorney and based on Supreme Court Rule 13.5 and Rule 22, and 28 U.S.C. § 2101 respectfully requests a thirty-day extension of time, up to and including Friday, December 5th, 2025, within which to file a petition for writ of certiorari from the judgment entered by the United States Court of Appeals for the Eleventh Circuit, issued on August 7, 2025. *See United States v. Brown*, No. 23-13804, 2025 WL 2254163 (11th Cir. Aug. 7, 2025) (attached hereto as Attachment 1). Mr. Brown has not previously sought an extension of time from this Court. He files this Application over ten days before his current deadline, which is Wednesday,

November 5th, 2025. *See* S.Ct. R. 13.5. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1).

Mr. Brown asks this Court to extend the deadline because the issues in this case are complex, involving both detailed historical analysis and voluminous Circuit case law that reveals a number of potentially relevant Circuit splits. It will therefore require more time of counsel to prepare a well-researched and polished petition worthy of this Court's time. As well, the undersigned counsel is responsible for a majority of the direct appeals and post-conviction proceedings for the Federal Defenders of the Middle District of Georgia, Inc., with several briefing deadlines between now and the current certiorari deadline. These further demands on counsel's time may prevent counsel from preparing a competent and concise petition.

Wherefore, since the time within which to file a petition for writ of certiorari in this case will expire on Wednesday, November 5th, 2025, unless extended, Mr. Brown requests that an order be entered extending his time to file a petition for writ of certiorari by sixty days, to and including Friday, December 5th, 2025.

Respectfully submitted this 24th day of October, 2025.



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