

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

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IN THE  
**Supreme Court of the United States**

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KEITH LASHON BELL,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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Application to the Hon. John G. Roberts, Jr.  
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 FOR EXTENSION OF TIME

Pursuant to Supreme Court Rules 13.3, 13.5, 22, 30, and 33.2, Applicant requests a 60-day extension of time, to and including January 31, 2026, to file a Petition for a Writ of Certiorari. Unless an extension is granted, the deadline for filing the Petition for a Writ of Certiorari will be December 2, 2025. This application is being filed more than 10 days before that date. The jurisdiction of this Court would be invoked under 28 U.S.C. § 1254(1). Copies of the Fourth Circuit's opinion and the order denying rehearing are attached as the Appendix (App. 1a-7a).

In support of this application counsel for Applicant states:

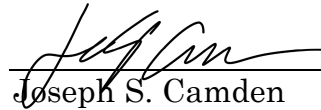
1. Fourth Circuit issued its decision in Applicant's case on August 6, 2025. *United States v. Bell*, No. 23-4627 (4th Cir.), ECF No. 84. Applicant filed a timely petition for panel rehearing on August 20, 2025. ECF No. 86. The petition for rehearing was denied on September 3, 2025. ECF No. 91. The deadline for a Petition for Writ of Certiorari is therefore December 2, 2025. Supreme Court Rules 13.1, 13.3.
2. The Fourth Circuit dismissed Applicant's appeal on the government's motion, and over objection, pursuant to an appellate waiver provision of Applicant's original plea agreement. On October 10, 2025, this Court granted a Petition for Writ of Certiorari in *Hunter v. United States*, No. 24-1063 on an issue relevant to Applicant's case. The Question Presented in that case asks what exceptions apply to prevent enforcement of general appeal waivers. The

Petitioner's merits brief is due, after an extension was granted, on December 4, 2025; respondent's brief is due January 14, 2026.

3. It is likely that Applicant's Petition for Writ of Certiorari will depend on the positions of the parties and the Court's eventual resolution of the first Question Presented in *Hunter*. Therefore counsel for Applicant requests an extension of not more than 60 days to and including January 31, 2026, to allow review of the positions of the parties in *Hunter* and accommodate that pending case in his Petition for Writ of Certiorari.

Respectfully submitted,

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