

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

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

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KEEGAN L. LOVELL,  
*Applicant,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

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**Application to the Hon. John G. Roberts, Jr.  
for Extension of Time to File a  
Petition for a Writ of Certiorari to the  
United States Court of Appeals for the Armed Forces**

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LUKE D. WILSON  
Air Force Appellate Defense Div.  
1500 West Perimeter Road  
Suite 1100  
Joint Base Andrews, MD 20762

DWIGHT H. SULLIVAN  
*Counsel of Record*  
Air Force Appellate Defense Div.  
1500 West Perimeter Road  
Suite 1100  
Joint Base Andrews, MD 20762  
dwight.sullivan.1@us.af.mil

*Counsel for Applicant*

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Pursuant to Supreme Court Rules 13(5), 22, and 30, the Applicant, Keegan L. Lovell, requests a 60-day extension of time, to and including Monday, February 2, 2026, to file a petition for a writ of certiorari. Unless an extension is granted, the deadline for filing the petition for certiorari is December 2, 2025. This Application is being filed more than 10 days before that date.

In support of this application, Applicant states the following:

1. The Court of Appeals for the Armed Forces (CAAF) rendered its decision denying review of Applicant's case on September 3, 2025. This Court has jurisdiction

under 28 U.S.C. § 1259(3). A copy of the CAAF's order denying review is attached to this application.

2. Applicant, then a member of the United States Air Force, was tried by a general court-martial composed of military judge alone at Travis Air Force Base, CA, on March 13, 2024. Consistent with his plea, he was found guilty of one specification of wrongfully possessing child pornography, one specification of wrongfully viewing child pornography, and one specification of wrongfully receiving child pornography, all charged under Article 134, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 934, and one specification of soliciting another to distribute child pornography charged under Article 82, UCMJ, 10 U.S.C. § 882. The military judge sentenced Appellant to thirty months of confinement, a dishonorable discharge, reduction to the grade of E-1, and a reprimand.

3. At the Air Force Court of Criminal Appeals (AFCCA), Applicant challenged, *inter alia*, whether the military trial judge failed to elicit a factual basis for his guilty plea and whether the military trial judge failed to establish Appellant's understanding of the critical difference between behavior that is constitutionally permissible and behavior that is prohibited. On May 22, 2025, the AFCCA affirmed the findings and sentence.

4. Applicant sought discretionary review by the Court of Appeals for the Armed Forces (CAAF). He raised the same issues that he had raised at the AFCCA level. On September 3, 2025, the CAAF denied Applicant's petition to review his case.

5. Good cause exists to grant the requested extension. Applicant's primary counsel is a reservist in the Air Force Reserves. Consistent with the Antideficiency Act, 31 U.S.C. §§ 1341–42, 1517, the Air Force does not allow that counsel to work on cases unless he is in a military status. The lapse of appropriate federal government funding limited the opportunity of Air Force Reservist judge advocates to perform duty, which prevented Applicant's counsel from working on his petition for certiorari for the forty-three days from October 1 until November 13, 2025.

6. Additionally, the printing process required for Applicants' petition must be processed through a federal government agency (the Air Force), which has payment and processing requirements that a private firm does not. The length of the procurement process for a printing job cannot be forecasted with certainty, often has delays, and cuts approximately two weeks out of counsel's time to finalize the petition for a writ of certiorari.

7. Applicant thus requests a 60-day extension for the filing of Applicant's certiorari petition.

For the foregoing reasons, Applicant respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari up to, and including, Monday, February 2, 2026.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dwight H. Sullivan". The signature is fluid and cursive, with the first name "Dwight" and last name "Sullivan" being the most legible parts.

Dwight H. Sullivan  
*Counsel of Record*  
Air Force Appellate Defense Division  
1500 Perimeter Road, Suite 1100  
Joint Base Andrews, MD 20762  
dwight.sullivan.1@us.af.mil  
(240) 612-4770

November 14, 2025

**APPENDIX**

**United States Court of Appeals  
for the Armed Forces  
Washington, D.C.**

United States,  
Appellee

USCA Dkt. No. 25-0216/AF  
Crim.App. No. 40614

v.

**ORDER DENYING PETITION**

Keegan L.  
Lovell,  
Appellant

On consideration of the petition for grant of review of the decision of the United States Air Force Court of Criminal Appeals, it is by the Court, this 3rd day of September, 2025,

**ORDERED:**

That the petition is hereby denied.

For the Court,

/s/ Malcolm H. Squires, Jr.  
Clerk of the Court

cc: The Judge Advocate General of the Air Force  
Appellate Defense Counsel (Wilson)  
Appellate Government Counsel (Payne)