

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

In the Supreme Court of the United States

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Brandon Jackson,  
Petitioner,

v.

United States,  
Respondent.

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**Application for Extension of Time in Which to  
File a Petition for a Writ of Certiorari**

To the Honorable John G. Roberts, Jr., Chief Justice of the United States and  
Circuit Justice for the Fourth Circuit:

Petitioner Brandon Jackson, pursuant to Supreme Court Rules 13.5 and 22,  
respectfully makes an application to extend by 60 days the time in which to file a petition  
for writ of certiorari from the judgment entered by the United States Court of Appeals  
for the Fourth Circuit. In support thereof, counsel states the following:

1. Mr. Jackson was indicted on one count of transporting a firearm while  
under felony indictment, under 18 U.S.C. § 922(n). He moved to dismiss the indictment  
on the ground that § 922(n) violates the Second Amendment. After the district court  
denied his motion, Mr. Jackson pled guilty, preserving the right to raise his Second  
Amendment challenge on appeal.

2. On September 12, 2025, the Fourth Circuit issued an opinion denying Mr.  
Jackson's Second Amendment claim and affirming his conviction. *United States v.*

*Jackson*, 152 F.4th 564 (4th Cir. 2025); see Appendix A. Mr. Jackson filed a timely petition for rehearing en banc, which the Fourth Circuit denied on October 10, 2025. See Appendix B.

3. This Court has jurisdiction over Mr. Jackson's case under 28 U.S.C. § 1254(1). His petition for a writ of certiorari is currently due on January 8, 2026.

4. Since Mr. Jackson's en banc petition was denied, I have been busy with numerous filings in both district court and the Fourth Circuit, as well as an oral argument in the Fourth Circuit. In addition, I will be on leave for numerous days between now and January 8th because of the holidays. Accordingly, I will need additional time to prepare a petition for writ of certiorari in Mr. Jackson's case.

5. For the reasons described above, Mr. Jackson respectfully requests that the Court grant a 60-day extension of the deadline to file a petition for a writ of certiorari.

Respectfully submitted,

/s/ Cullen Macbeth

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