

No. _____

In the Supreme Court of the United States

FRANK THOMPSON,

Petitioner,

v.

CARL WILSON, in his official capacity as
Commissioner, Maine Department of
Marine Resources,

Respondent.

*On Petition For A Writ Of Certiorari
To The United States Court Of Appeals
For The First Circuit*

**APPLICATION TO THE HONORABLE KETANJI BROWN JACKSON
FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE
A PETITION FOR A WRIT OF CERTIORARI**

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To the Honorable Ketanji Brown Jackson, Associate Justice of the Supreme Court of the United States and Circuit Justice for the First Circuit:

Pursuant to Supreme Court Rule 13.5, Petitioner Frank Thompson respectfully requests an extension of time of 30 days to file his Petition for a Writ of Certiorari in this Court up to and including March 19, 2026.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *Thompson v. Wilson*, No. 25-1007, 2025 WL 3214737 (1st Cir. Nov. 18, 2025) (attached as Exhibit 1). The Petition for a Writ of Certiorari is currently due on February 17, 2026, per Supreme Court Rules 13.1 and 13.3. This application for an extension of time is filed more than ten days prior to that date.

JURISDICTION

This case arises under the Fourth Amendment to the United States Constitution. Specifically, Petitioner Frank Thompson, a lobster fisherman in Vinalhaven, Maine, alleges that the Maine Department of Marine Resources, by and through Respondent Commissioner Carl Wilson, mandates continuous, real-time GPS tracking of lobster vessels, in violation of his Fourth Amendment rights. Respondent's rule subjects Petitioner to 24 hours per day, 7 days a week GPS surveillance without a warrant, pre-compliance review, or any limitation tied to the regulated activity, regardless of whether he is lobster fishing or engaged in personal activity.

The United States Court of Appeals for the First Circuit held that the “closely regulated industry” exception to the Fourth Amendment allows Maine to compel lobstermen to submit to GPS tracking. The forthcoming petition will ask whether Maine’s continuous GPS surveillance rule constitutes an unreasonable search and seizure contrary to this Court’s decisions in *Carpenter v. United States*, 585 U.S. 296 (2018), *United States v. Jones*, 565 U.S. 400 (2012), and similar cases prohibiting such digital surveillance without a warrant, as well as its decisions in cases like *City of Los Angeles v. Patel*, 576 U.S. 409 (2015), and *New York v. Burger*, 482 U.S. 691 (1987), that govern the “closely regulated industry” exception. This Court has jurisdiction over a timely filed petition for a writ of certiorari in this case pursuant to 28 U.S.C. § 1254(1).

REASONS FOR GRANTING EXTENSION OF TIME

Petitioner’s undersigned counsel of record requires extra time to file a petition in this case because new counsel, who will provide Petitioner with free legal representation and be responsible for preparing the petition, has only recently entered a representation agreement with Petitioner. Counsel therefore needs additional time to become familiar with the full record in this case to draft the petition. Counsel also requires extra time to file a petition in this case due to the press of other matters.

CONCLUSION

For the foregoing reasons, Petitioner requests that this Court grant an extension of 30 days, up to and including March 19, 2026, within which to file a Petition for a Writ of Certiorari.

DATED: December 15, 2025.

Respectfully submitted,

/s/ Mark Miller

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CERTIFICATE OF SERVICE

A copy of this application was served via email and U.S. mail to counsel listed below in accordance with Supreme Court Rules 22.2, 29.3, and 29.4(a):

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DATED: December 15, 2025.

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