

No. 25-_____

IN THE
Supreme Court of the United States

ABDULLAH SAID ALI
Petitioner,

v.

CITY OF PORTLAND.
Respondent.

APPLICATION FOR AN EXTENSION OF TIME TO
FILE PETITION FOR WRIT OF CERTIORARI TO
THE COURT OF APPEALS OF THE STATE OF
OREGON

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TO THE HONORABLE ELENA KAGAN,
Associate Justice of the Supreme Court of the United
States, and Circuit Justice for the United States
Court of Appeals for the Ninth Circuit:

The Petitioner, ABDULLAH SAID ALI,
through undersigned counsel and pursuant to 28
U.S.C. § 2101(d) and Supreme Court Rules 13.5 and
30.2, respectfully requests an extension of time of
sixty (60) days to file his Petition for Writ of
Certiorari in this Court. He invokes the jurisdiction
of this court under 28 U.S.C. § 1257(a).

Mr. Ali will seek review of the decision of the Oregon Court of Appeals entered on April 16, 2025. The Oregon Supreme Court denied discretionary review on September 18, 2025, and the Oregon Court of Appeals issued an appellate judgment on November 7, 2025. On November 20, 2025, the Oregon Court of Appeals granted Mr. Ali's motion to recall the appellate judgment and hold the case in abeyance pending potential filing of a petition for writ of certiorari.

Absent an extension, the deadline for filing the petition for certiorari is December 17, 2025. This application is not being made at least ten (10) days before petitioner's original due date, which petitioner understands is a requirement under Supreme Court Rule 30.2. However, that rule allows for an application for an extension of time filed fewer than 10 days before the due date "in the most extraordinary circumstances."

Undersigned counsel asks the Court to extend the deadline because the issues in this case are complex and involve recent precedent from this Court that require extensive historical research. At issue is whether the City of Portland's prohibition on possession of a loaded firearm within the city, Portland City Code (PCC) 14A.60.010(A) violates the Second Amendment as applied to Mr. Ali. Mr. Ali contends that the ordinance—which contains an exception for persons with concealed handgun licenses—violates the Second Amendment because it is inconsistent with the nation's tradition of firearm regulation.

Undersigned counsel has had substantial obligations in the past 90 days. Oregon is currently in the midst of a public-defense crisis, with hundreds, and at times thousands, of indigent defendants waiting months for appointment of trial counsel on active cases. In an effort to help alleviate this crisis, undersigned counsel took leave from his appellate position in August to work in the trial division of the Oregon Public Defense Commission. There he represented otherwise uncounseled indigent defendants at the trial level while putting his appellate caseload on pause. That rotation ended on November 14, 2025, and then counsel underwent surgery on November 17, 2025, and has been on limited duties since that time. Recovery from that surgery has taken longer than counsel has expected, and it has required undersigned counsel to make unusual requests for additional time and caused a significant, unexpected backlog in counsel's caseload.

In short, on December 7, 2025, the deadline under Rule 30.2 to file a request additional time, counsel did not expect that he would need to make such a request. Further, counsel has limited experience practicing before this court and its timelines for seeking additional time—in Oregon state appellate courts, requests for extensions of time are frequently made on the date a filing is due.

Undersigned counsel is requesting 60 additional days to complete the filing so that, should this Court allow this extension, he will have sufficient time to complete the petition without requesting additional time.

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Counsel has consulted with opposing counsel, Fallon Niedrist de Guzman, Deputy City Attorney for the City of Portland, about this motion. The City does not object.

Respectfully submitted,

/s/ Erik Blumenthal

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