

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

---

In The

**Supreme Court of the United States**

---

CRYSTAL GREENLAW,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

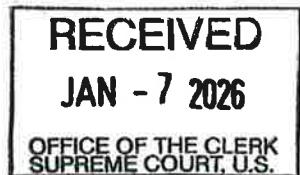
On Petition for a Writ of Certiorari to the United States  
Court of Appeals for the First Circuit

---

**APPLICATION FOR EXTENSION OF TIME TO FILE  
A PETITION FOR WRIT OF CERTIORARI**

---

Ms. Crystal Greenlaw  
Petitioner, Pro Se  
Register #00306-509  
FPC Alderson  
Glen Ray Road, Box A  
Alderson, WV 24910



APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR  
WRIT OF CERTIORARI TO THE UNITED STATES COURT OF  
APPEALS FOR THE FIRST CIRCUIT

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

I. STATEMENT OF JURISDICTION

Original Jurisdiction of this Honorable Court is invoked on a petition for a writ of certiorari pursuant to Article III of the constitution of the United States, 28 U.S.C. §1254(1), and is derived from a Final Order of the First U.S. Circuit Court of Appeals in Case No. 24-1226, affirming the denial of Petitioner's motion for compassionate release. The jurisdiction of the Court of Appeals was invoked pursuant to 18 U.S.C. § 3742 and 28 U.S.C. § 1291.

II. JUDGEMENT TO BE REVIEWED

The Judgment of the First U.S. Circuit Court of Appeals in the above noted cause is attached (as Exhibit #1) and was entered on October 14, 2025. Unless extended, the time for filing a petition for a writ of certiorari will expire on January 12, 2026. The jurisdiction of this Court would be invoked under 28 U.S.C. 1254(1).

III. REASONS EXTENSION IS JUSTIFIED

- (1). The Government Shutdown and Recent Holidays have interfered with Petitioner's Access to the Prison Law Library.
- (2). This case presents an important question of procedural due process in that the District Court denied Petitioner's motion for compassionate release the day after the prosecution filed their response in opposition without allowing Petitioner, a pro se prisoner, any opportunity to reply to the prosecution's 21-page opposition.
- (3). Petitioner presented this issue to the First Circuit which affirmed on a factually questionable basis – that the court did not rely on the

prosecution's response in denying Petitioner's motion. The record demonstrates that the District Court relied on arguments raised in that 21-page response, to which Petitioner was deprived any opportunity to reply, in denying the motion for compassionate release.

- (4). Petitioner is serving a 10-year sentence and believes her issue merits consideration by this Court and an extension is warranted.
- (5). The United States will not be prejudiced by the requested extension.

Accordingly, it is respectfully requested that for good cause shown, an extension of time within which to file the petition be granted up to and including March 13, 2026 as permitted by Supreme Court Rules 13.5 and 30.

Dated: December 31, 2025.

Respectfully submitted,

Crystal Greenlaw  
Ms. Crystal Greenlaw  
Petitioner, Pro Se  
Register #00306-509  
FPC Alderson  
Glen Ray Road, Box A  
Alderson, WV 24910

## CERTIFICATE OF SERVICE

I hereby declare that on this 2nd day of January, 2026 as required by Supreme Court Rule 29, I have served a true copy of the attached Motion for Extension of Time To File Petition for Writ of Certiorari on each party to the above styled proceeding or that party's counsel, by depositing same in the United States mail with first class postage prepaid and affixed thereon, to: The Solicitor General of the United States of America, Department of Justice, 950 Pennsylvania Ave., N. W., Room 5614, Washington, D.C. 20530.

*Crystal Greenlaw*

Ms. Crystal Greenlaw  
Petitioner, Pro Se  
Register #00306-509  
FPC Alderson  
Glen Ray Road, Box A  
Alderson, WV 24910

EXHIBIT #1

**United States Court of Appeals  
For the First Circuit**

---

No. 24-1226

UNITED STATES,

Appellee,

v.

CRYSTAL GREENLAW,

Defendant - Appellant.

---

Before

Barron, Chief Judge,  
Gelpí and Rikelman, Circuit Judges.

---

**JUDGMENT**

Entered: October 14, 2025

Defendant-appellant Crystal Greenlaw appeals the district court's denial of her motion to reduce her sentence pursuant to 18 U.S.C. § 3582(c)(1)(A). On appeal, Greenlaw argues that the district court abused its discretion and deprived her of due process in denying her motion before she had an opportunity to submit a reply to the government's opposition. But because the district court's decision makes clear that the denial of relief was based on the court's supportable determination that Greenlaw failed to carry her burden of demonstrating entitlement to relief rather than on any new argument or information submitted in the government's opposition, no abuse of discretion or deprivation of due process has been shown. See United States v. D'Angelo, 110 F.4th 42, 47-49 (1st Cir. 2024) (setting out standard of review and general principles); see also United States v. Texeira-Nieves, 23 F.4th 48, 55 (1st Cir. 2022) ("[w]e start with the elementary tenet that district courts possess significant discretion in evaluating motions for compassionate release").

In addition, Greenlaw has tendered additional documents on appeal. Even if these documents could help to establish the identity and/or incapacitation of Greenlaw's son's primary caregiver, they are not properly considered because they were not presented to the district court. Having reconsidered the motion to supplement the record, the same is denied, and the district court's order denying Defendant's motion for a sentence reduction is affirmed. See 1st Cir. R. 27.0(c).

By the Court:

Anastasia Dubrovsky, Clerk

cc:

Crystal Greenlaw

Joel B. Casey

Nicholas S. Heimbach

Raphaelle A. Silver

Lindsay Feinberg

Brian Scott Kleinbord