
In The
SUPREME COURT OF THE UNITED STATES
October Term 2026

Timothy Paul Beagle,
Applicant/Petitioner,

v.

The People of the State of Colorado
Respondent.

Application for an Extension of Time Within
Which to File for a Writ of Certiorari to the Supreme Court of the State of Colorado.

APPLICATION TO THE HONORABLE JUSTICE
NEIL M. GORSUCH AS CIRCUIT JUSTICE

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August 7, 2026

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APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Timothy Paul Beagle hereby requests a 60-day extension of time within which to file a Petition for Writ of Certiorari, up to and including Friday, October 16, 2026.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *Timothy Paul Beagle v. The People of the State of Colorado*, 588 P.3d 697, 2026 CO 24M (Colo. 2026), entered May 18, 2026. *See* Attachment A.

JURISDICTION

This Court will have jurisdiction over any timely filed Petition for Writ of Certiorari in this case pursuant to 28 U.S.C. § 1254(1). Under Rules 13.1, 13.3, and 30.1 of the Rules of this Court, a Petition for Writ of Certiorari is due to be filed on August 17, 2026. In accordance with Rule 13.5, this application is being filed 10 days in advance of the filing date for the Petition for Writ of Certiorari.

REASONS JUSTIFYING AN EXTENSION OF TIME

Mr. Beagle respectfully requests a 60-day extension of time in which to file a Petition for Writ of Certiorari. In support of this request, undersigned counsel states:

1. On April 27, 2026, the Supreme Court of Colorado affirmed the judgment of the Colorado Court of Appeals, which affirmed the order imposing Mr. Beagle's sexually violent predator designation. *See* Attachment B.

2. On May 11, 2026, Mr. Beagle filed a petition for rehearing to the Colorado Supreme Court. The court issued an order denying Mr. Beagle's petition for rehearing on May 18, 2026. *See* Attachment A.

3. Mr. Beagle has ninety days to file a Petition for Writ of Certiorari from the date of the denial of his petition for rehearing. Sup. Ct. R. 13.3. The petition is therefore due on Monday, August 17, 2026, and this application is being filed ten days before that date. Sup. Ct. R. 13.5.

4. Undersigned counsel requires additional time in which to prepare and draft the Petition for Writ of Certiorari in this matter. Since the Colorado Supreme Court's denial of Mr. Beagle's petition for rehearing in this case, undersigned counsel has been busily engaged in numerous matters representing indigent defendants in Colorado's appellate courts.

5. As of this filing, attorney Kevin Whitfield, counsel of record in the Colorado Court of Appeals and Colorado Supreme Court, had to prepare and file the following appellate briefs: the Petition for Writ of Certiorari in *Green v. People*, Case No. 26SC180, filed May 21, 2026; the Reply Brief in *People v. Deh*, Case No. 23CA1715, filed May 28, 2026; the Opening Brief in *People v. Huynh*, Case No. 24CA1203, filed July 9, 2026; the Opening Brief in *People v. Pearson*, Case No. 25CA22, filed July 21, 2026; the Reply Brief in *People v. Lightfoot*, Case No. 24CA1299, filed July 21, 2026; the Reply Brief in *People v. Ritter*, Case No. 24CA890, filed July 31, 2026; and the Opening Brief in *People v. Seay*, Case No. 25CA706, filed August 5, 2026.

6. Further, attorney Kevin Whitfield also must prepare: the Reply Brief in *People v. May*, Case No. 24CA699, due August 18, 2026, after 63 days of extension; the Opening Brief in *People v. Otero*, Case No. 25CA823, due August 20, 2026, after 365 days of extension; the Petition for Writ of Certiorari in *People v. Fenstermacher*, Case No. 26SC468, due August 27, 2026, after 42 days of extension; and the Opening Brief in *People v. Davis*, Case No. 25CA427, due September 21, 2026, after 365 days of extension.

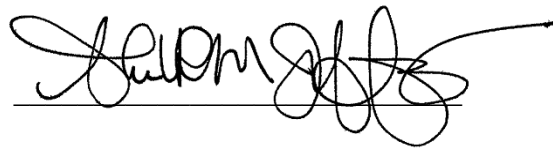
7. As of this filing, attorney Shann Jeffery has been busily engaged in the following appellate advocacy and filing the following appellate briefs: the Opening and Reply Briefs in *People v. Wells-Yates*, Case No. 26CA425, filed on June 12 and August 3, 2026, on an expedited briefing schedule and with no extensions of time allowed; the Answer Brief in *People v. Rabih*, Case No. 24CA1039, filed on June 24, 2026, with no extensions of time allowed; the Reply Brief in *People v. Medina*, Case No. 23CA2168, filed July 9, 2024; the Reply Brief in *People v. Kessler*, Case No. 23CA763, filed July 24, 2025; and the Oral Argument in *People v. Duong*, Case No. 23CA217, held August 4, 2026. Further, attorney Shann Jeffery must also prepare the Opening Brief in *People v. Arroyo*, Case No. 24CA509, due August 28, 2026, with no further extensions allowed.

8. A 60-day extension within this context will allow undersigned counsel to adequately prepare, draft, and file the Petition for Writ of Certiorari in this matter.

CONCLUSION

For the foregoing reasons, Mr. Beagle respectfully requests that this Court grant an extension of 60 days, up to and including Friday, October 16, 2026, within which to file a Petition for Writ of Certiorari in this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Shann Jeffery', written over a horizontal line.

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