

IN THE SUPREME COURT OF THE UNITED STATES

SEAN JOHNSON,

Applicant,

v.

PEOPLE OF THE STATE OF COLORADO,

Respondent.

No. _____

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

**TO THE HONORABLE NEIL M. GORSUCH,
ASSOCIATE JUSTICE OF THE SUPREME COURT OF THE UNITED STATES
AND CIRCUIT JUSTICE FOR THE TENTH CIRCUIT**

Sean Johnson

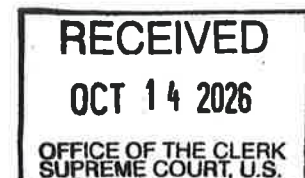
Applicant, Pro Se

1501 S Acoma St. Unit 432

Denver, CO 80223

720-537-9163

seanjadvocate@gmail.com



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

**To the Honorable Neil M. Gorsuch, Associate Justice of the Supreme Court of the
United States and Circuit Justice for the Tenth Circuit:**

Pursuant to Rules 13.5, 22, and 30 of the Rules of this Court, Applicant Sean Johnson respectfully requests a sixty-day extension of time, from November 30, 2026 through January 29, 2027, within which to file a petition for a writ of certiorari seeking review of the final judgment in his Colorado criminal case.

Justice Gorsuch is the Circuit Justice assigned to the Tenth Circuit, which includes Colorado.

1. Judgment and Procedural History

1. Applicant was convicted in the District Court for Jefferson County, Colorado, in Case No. 2021CR3250.
2. Applicant thereafter pursued a direct appeal in the Colorado Court of Appeals, Case No. 23CA1346.
3. On June 18, 2026, the Colorado Court of Appeals entered its judgment affirming [or otherwise disposing of] Applicant's direct appeal. A copy of that opinion and judgment is attached as Appendix A.
4. Applicant timely sought discretionary review in the Colorado Supreme Court.
5. On August 31, 2026, the Colorado Supreme Court denied Applicant's petition for writ of certiorari. A copy of that order is attached as Appendix B.
6. No petition for rehearing was filed from that denial.

7. Under Supreme Court Rule 13.1, Applicant's petition for writ of certiorari is presently due November 30, 2026.
8. Applicant requests the full sixty-day extension authorized by Rule 13.5, which would extend the filing deadline through January 29, 2027.

2. Jurisdiction

9. Applicant intends to invoke this Court's jurisdiction under 28 U.S.C. § 1257(a) to seek review of the final judgment entered in his state criminal case after review in the highest court of the State in which a decision could be had.
10. Applicant intends to present substantial federal constitutional questions arising from the judgment below, including issues preserved and litigated during the state appellate proceedings.
11. This application does not ask the Court to resolve those questions. Applicant seeks only additional time within which to adequately research, prepare, and present his petition.

3. Good Cause for the Requested Extension

12. Good cause exists because several circumstances have substantially reduced Applicant's practical opportunity to prepare a petition satisfying this Court's substantive and procedural requirements.
13. First, although the Colorado Supreme Court denied discretionary review on August 31, 2026, Applicant did not learn of that denial until **September 24, 2026, at approximately 5:24 p.m.**, when his newly assigned appellate attorney informed him by email.

14. Applicant's former appellate attorney, who had prepared the state-court petition for discretionary review, had left that position, and Applicant did not receive notice of the denial before successor counsel's September 24 email.
15. Consequently, approximately twenty-four days of the ninety-day period for seeking review in this Court had already elapsed before Applicant learned that the Colorado Supreme Court had denied review.
16. Upon receiving notice, Applicant began investigating this Court's filing requirements, the federal questions that may properly be presented, and the materials necessary to prepare a petition for writ of certiorari.
17. Second, Applicant presently expects to prepare the petition without counsel experienced in practice before this Court. Applicant must therefore independently review the state appellate record, identify and frame the questions presented, research the governing federal constitutional authorities, prepare the required appendix, and comply with this Court's procedural and formatting requirements.
18. Applicant does not seek an extension merely for convenience. The additional time is requested so that he can prepare a petition that fairly and accurately presents the federal issues arising from his case.
19. Third, Applicant has substantial ongoing physical limitations that materially restrict the amount of sustained legal research and drafting he is able to perform.
20. Applicant's physical condition requires him to remain in a substantially reclined or near-lying position for much of the day and night. He has significant mobility limitations and uses a wheelchair, walker, and cane as circumstances require.

21. Applicant's condition substantially limits his ability to sit upright for prolonged periods, travel, retrieve materials, and perform sustained research and document preparation.
22. Attempts to remain seated upright for extended periods can precipitate severe migraines. When such a migraine occurs, Applicant is unable to perform productive legal research or drafting for the remainder of that day and, at times, into the following day.
23. Applicant's physical limitations require him to conduct research, record review, drafting, and editing in shorter intervals than ordinarily would be possible and sometimes require him to stop work entirely when his symptoms worsen.
24. Applicant also has existing educational and litigation obligations. He does not rely upon those obligations standing alone as good cause for the requested extension; rather, they further reduce the limited periods during which his physical condition permits productive work.
25. The combination of delayed notice of the August 31, 2026 order, the resulting loss of approximately twenty-four days of the original filing period, Applicant's need to prepare a technically demanding Supreme Court filing without experienced Supreme Court counsel, and his significant continuing physical limitations constitutes good cause for the requested extension.
26. This is Applicant's first application for an extension of time to file the contemplated petition.

27. The requested extension will not alter the judgment below or grant substantive relief. It will only provide additional time within which Applicant may prepare and submit his petition for this Court's consideration.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests that the time within which to file his petition for a writ of certiorari be extended sixty days, from November 30, 2026 through January 29, 2027.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sean Johnson', written in a cursive style.

Sean Johnson

Applicant, Pro Se

1501 S Acoma St. Unit 432

Denver, CO 80223

720-537-9163

seanadvocate@gmail.com

Dated: October 9, 2026