

No. _____

Seventh Circuit Appeal No. 24-2343

IN THE
SUPREME COURT OF THE UNITED STATES

IELIOT JACKSON,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

EXHIBIT A – AFFIDAVIT OF COUNSEL

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**AFFIDAVIT OF ADAM STEVENSON
IN SUPPORT OF APPLICATION FOR EXTENSION OF TIME TO
PETITION FOR A WRIT OF CERTIORARI**

I submit this affidavit in support of Ieliot Jackson's Application for an
Extension of Time to Petition for a Writ of Certiorari:

1. On August 30, 2024, pursuant to the Criminal Justice Act of 1964, the Court of Appeals for the Seventh Circuit ("Court of Appeals") appointed me to represent Ieliot Jackson in his direct appeal arising out of the District Court for the Northern District of Illinois ("District Court"). (Exhibit B.) Mr. Jackson is in not in custody. However, he is in the process of revocation proceedings that are presently stayed pending state legal matters..

2. On August 11, 2026, the Court of Appeals issued an order summarily affirming Mr. Jackson's conviction. (Exhibit C.)
3. In its order, the Court of Appeals recognized that *United States v. Prince*, 171 F.4th 1009 (7th Cir. 2026) and *United States v. Watson*, 171 F.4th 1012 (7th Cir. 2026), foreclosed Mr. Jackson's appeal of a motion to dismiss his indictment that pertained to the constitutionality of 18 U.S.C. § 922(g)(1). (Exhibit C.)
4. There is at a minimum a reasonable prospect that this Court will grant *certiorari* and potentially reverse the decision of the Court of Appeals. The Court has not issued an opinion on the constitutionality of 18 U.S.C. § 922(g)(1) following *New York State Rifle & Pistol Assn., Inc. v. Bruen*, 592 U.S. 1 (2022), which altered the constitutional analysis under the Second Amendment. Some circuits have found merit to at least some as-applied challenges to the statute. *See, e.g., Range v. Att'y Gen. U.S.*, 124 F.4th 218 (3d Cir. 2024) (*en banc*).
5. Counsel has in the past been, and currently is, engaged in other litigation currently in ongoing briefing. This work includes a reply brief completed on October 2, 2026, in *United States v. Aundre Allen*, Seventh Circuit Appeal No. 24-2541; a petition for writ of certiorari in this Court in *Mitchell Melega v. United States*, Seventh Circuit Appeal No. 24-2298; oral arguments in *United States v. Jayden Bertram*, Seventh Circuit Appeal No. 25-2093 (October 27th), and *United States v. Quintez Turner*,

Seventh Circuit Appeal No. 25-2489 (October 28th); and a November 12, 2026, postconviction evidentiary hearing in *Erin Graham v. United States*, WDWI Case No. 24-cv-253. These cases are in addition to several other legal matters and work duties while running a federal appellate law school clinic.

6. In addition to other casework, counsel is not a full-time practicing attorney, and is instead the director of a legal clinic at the University of Wisconsin Law School. Due to the educational nature and structure of the project and counsel's work directing it, counsel has additional time commitments in addition to, and apart from, litigation. Though not itself a basis for an extension given the general time commitments of members of the bar, in combination with the casework listed above, these matters demonstrate the need for additional time to effectively represent Mr. Jackson's interests before this Court.
7. Mr. Jackson is aware of the possibility that counsel would need to file such a motion for an extension of time to petition the Court. Mr. Jackson has no objections to requesting a 60-day extension.
8. There is no prejudice to the respondent by the granting of this motion, which would serve justice and the public interest.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this __ day of _____, 2026.

Adam Stevenson
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Attorney for Petitioner,
IELIOT JACKSON

State of Wisconsin
County of Dane

This document was signed before me on _____ by _____

NOTARY STAMP/SEAL

Name:
Notary Expiration Date: