

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

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IN THE  
**Supreme Court of the United States**

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WILLIAM EDWARD POWELL,

*Petitioner,*

v.

JANET L. YELLEN, IN HER OFFICIAL CAPACITY AS SECRETARY OF THE UNITED STATES  
DEPARTMENT OF TREASURY, UNITED STATES DEPARTMENT OF TREASURY, INTERNAL  
REVENUE SERVICE, DANIEL I. WERFEL, IN HIS OFFICIAL CAPACITY AS COMMISSIONER  
OF THE INTERNAL REVENUE SERVICE

*Respondents.*

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**Application for Extension of Time to File a Petition for a  
Writ of Certiorari to the United States Court of Appeals  
for the District of Columbia Circuit**

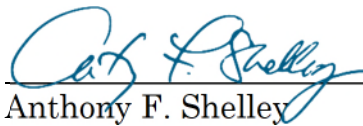
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**CERTIFICATE OF SERVICE**

I, Anthony F. Shelley, a member of the Bar of this Court, hereby certify that, on May 16, 2024, I caused one (1) copy of the **Application for Extension of Time to File a Petition for a Writ of Certiorari to the United States Court of Appeals for the District of Columbia Circuit** to be served by first-class mail, postage prepaid, on counsel of record for each respondent in this case as set forth below. I also caused an electronic copy of the Application in .pdf format to be served on counsel of record for each party in this case. I further certify that all persons required to be served have been served.

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