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IN THE
SUPREME COURT OF THE UNITED STATES

Joshua Willis,

Petitioner,

v.

United States of America,

Respondent.

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

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

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

Petitioner Joshua Willis, by undersigned counsel, prays for a 30-day extension of time, to and including Friday, June 28, 2024, in which to file a petition for a writ of certiorari. In support of this request, counsel states as follows:

1. On February 29, 2024, the United States Court of Appeals for the Tenth Circuit affirmed Mr. Willis's conviction for felon in possession of a firearm and ammunition under 18 U.S.C. § 922(g)(1). (Attachment A.)

2. Mr. Willis has ninety days from that date to file a petition for a writ of certiorari. Sup. Ct. R. 13.3. The petition is therefore due on May 29, 2024. This application is being filed at least ten days before that date.

3. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

4. Since the Tenth Circuit Court of Appeals' order and judgment in this case, undersigned counsel has filed a reply brief in *United States v. Sweet*, No. 23-5049 (filed March 5, 2024); a reply brief in *United States v. Baker*, No. 23-8042 (filed April 5, 2024); an opening brief in *United States v. Rosado*, No. 23-1294 (filed March 18, 2024); a petition for a writ of certiorari in *Borne v. United States*, Supreme Court No. 23-7293 (filed April 19, 2024); and a petition for a writ of certiorari in *Farris v. United States*, Supreme Court No. 23A893 (filed May 15, 2024). Counsel also presented oral argument before the Tenth Circuit Court of Appeals in *United States v. Sweet*, No. 23-5049 and *United States v. Baker*, No. 23-8042 on May 16, 2024.

5. In addition, counsel has a reply brief currently due on May 30, 2024, in *United States v. White*, No. 23-3122; an opening brief currently due on June 5, 2024, in *United States v. Long*, No. 24-6028; an opening brief currently due on June 10, 2024, in *United States v. Rivera*, No. 23-1401; and an opening brief currently due on June 10, 2024, in *United States v. Tyler*, No. 24-6035.

6. Given their own current caseloads, as well as the work undersigned counsel has put into this case as counsel of record, no other attorney in the Office of the Federal Public Defender is in a position to file the petition by its current due date.

* * *

For these reasons, Petitioner Joshua Willis respectfully requests that an order be entered extending the time in which to petition for a writ of certiorari by 30 days, to and including Friday, June 28, 2024. *See* Sup. Ct. R. 13.5.

Respectfully submitted,

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