

No. 24A-__

IN THE
Supreme Court of the United States

DONTE PARRISH,

Applicant,

v.

UNITED STATES OF AMERICA,

Respondent.

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

To the Honorable John Roberts, Chief Justice of the Supreme Court and
Circuit Justice for the Fourth Circuit:

1. Pursuant to Supreme Court Rules 13.5, 22, and 30, Applicant Donte Parrish respectfully requests a 47-day extension of time, up to and including September 9, 2024, to file a petition for a writ of certiorari to the United States Court of Appeals for the Fourth Circuit, seeking review of that court's published decision in *Parrish v. United States*, No. 20-1766 (4th Cir. July 17, 2023). The Fourth Circuit issued its initial decision on July 17, 2023. A copy of that order is attached as Appendix A. Applicant, acting pro se, timely sought rehearing on August 31, 2023. The Fourth Circuit assigned Applicant counsel and granted him leave to file a supplemental petition for rehearing on January 10, 2024. A copy of that order is attached as Appendix B. Applicant filed a supplemental petition for rehearing on

January 30, 2024. The Fourth Circuit, in a divided decision, denied Applicant's petition for rehearing en banc on April 23, 2024 and denied his motion for rehearing on April 25, 2024. Copies of those orders are attached as Appendix C and Appendix D, respectively. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1), and the time to file a petition for a writ of certiorari will otherwise expire on July 24, 2024. This Application is timely because it was filed on June 24, 2024, more than ten days prior to the date on which the time for filing the petition is to expire.

2. Applicant has good cause for an extension of time. Counsel for Applicant have, among their other professional obligations, an opening brief in *Small v. Osborne*, No. 23-1397 (7th Cir.), due on July 8, 2024; a motion to dismiss or other responsive pleading in *Bolos v. Grand Wailea*, No. 23-104 (D. Haw.), due on July 19, 2024; a supplemental brief on remand from this Court in *Bissonnette v. LePage Bakeries Park St., LLC*, No. 20-1681 (2d Cir.), due on July 24, 2024; a reply brief in support of certiorari in *Randstad v. Ortiz*, No. 23-1296 (U.S.), expected to be due around July 31, 2024; a reply brief in *Small v. Osborne*, No. 23-1397 (7th Cir.), expected to be due on August 28, 2024; and myriad intervening filings in connection with an MDL and related trial proceedings in state courts across the country.

WHEREFORE, Applicant respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for 47 days, to and including September 9, 2024.

Dated: June 24, 2024

Respectfully submitted,

/s/ Amanda K. Rice

AMANDA K. RICE
Counsel of Record
JONES DAY
150 W. Jefferson Ave
Suite 2100
Detroit, MI 48226
(313) 733-3939
arice@jonesday.com

Counsel for Applicant Donte Parrish