

No. _____

Seventh Circuit Appeal No. 22-2364

IN THE
SUPREME COURT OF THE UNITED STATES

BRYANT D. ARON,

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 Bryant Aron's Application for an
Extension of Time to Petition for a Writ of Certiorari:

1. On August 25, 2022, pursuant to the Criminal Justice Act of 1964, the Court of Appeals for the Seventh Circuit ("Court of Appeals") appointed me to represent Bryant Aron, in his direct appeal arising out of the District Court for the Northern District of Indiana ("District Court"). (Exhibit B.) Mr. Aron is in federal custody at FCI Beaumont. His projected release date is currently April 23, 2028.
2. On April 16, 2024, the Court of Appeals issued its opinion affirming Mr. Aron's conviction and sentence. (Exhibit C.)

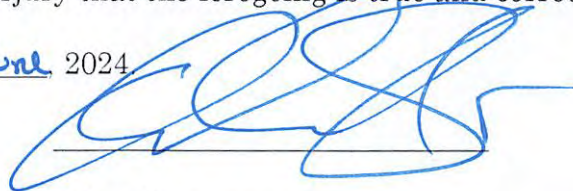
3. In its opinion, the Court of Appeals held that the district court did not inappropriately deny Mr. Aron's Fed. R. Crim. P. 11(c)(1)(C) plea agreement. (Exhibit C.)
4. There is at a minimum a reasonable prospect that this Court will grant *certiorari* and potentially reverse the decision of the Court of Appeals. The issue in this case involves the appropriate procedures the district court must follow in processing and accepting or rejecting a binding federal plea agreement.
5. Counsel has in the past been, and currently is, engaged in other litigation currently in ongoing briefing. This work includes briefing in *United States v. Marcus Dixon*, Seventh Circuit Appeal No. 23-2427 and *United States v. Eric Rowe*, Seventh Circuit Appeal No. 23-2646. Counsel has been in active briefing in a federal postconviction filing in *United States v. Erin Graham, Jr.*, Western District of Wisconsin Case No. 24-cv-253. Depending on the outcome of those cases, counsel anticipates further filings being necessary. These cases are in addition to several other legal matters while running a federal postconviction law school clinic and directing the University of Wisconsin Law School's prison-based clinical programs.
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 and classroom criminal law instructor in the fall.

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. Aron's interests before this Court.

7. Mr. Aron is aware of the possibility that counsel would need to file such a motion for an extension of time to petition the Court. Mr. Aron 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 27th day of June, 2024



Adam Stevenson
Clinical Professor
Supreme Court Bar No. 295931

University of Wisconsin Law School
Frank J. Remington Center
975 Bascom Mall
Madison, WI 53706
Phone: (608) 262-9233
Email: adam.stevenson@wisc.edu

Attorney for Petitioner,

BRYANT D. ARON

State of Wisconsin
County of Dane

This document was signed before me on June 27th, 2024 by Adam Stevenson

Lauren Lockwood Devine
Name: Lauren Lockwood Devine
Notary Expiration Date: is permanent

NOTARY STAMP/SEAL

