

No. 24-_____

IN THE
Supreme Court of the United States

ANDRE MICHAEL DUBOIS,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

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TO THE HONORABLE CLARENCE THOMAS,
Associate Justice of the Supreme Court of the United
States, and Circuit Justice for the United States Court of
Appeals for the Eleventh Circuit:

The Petitioner, ANDRE MICHAEL DUBOIS, through undersigned counsel and pursuant to 28 U.S.C. § 2101 and Supreme Court Rules 13.5 and 30.2, respectfully requests an extension of time of sixty (60) days to file his Petition for Writ of Certiorari in this Court. Mr. Dubois will seek review of the decision of the United States Court of Appeals

for the Eleventh Circuit entered on March 5, 2024. The same court denied his petition for rehearing en banc on June 10, 2024. Mr. Dubois invokes the jurisdiction of this Court pursuant to 28 U.S.C. § 1254. His time to file a Petition for Writ of Certiorari will expire on September 6, 2024. Mr. Dubois makes this application for an extension more than ten (10) days before the petition's original due date. This is his first request for an extension of time.

Mr. Dubois asks the Court to extend the deadline because the issues in this case are complex and involve very recent precedent from this Court, so the time required to do them justice is greater than usual. Moreover, counsel is working through hundreds of retroactive guideline cases pursuant to Amendment 821 to the United States Sentencing Guidelines. Counsel also has deadlines in other cases in August and September, including appeals in the Eleventh Circuit and post-conviction motions in the Northern District of Georgia, which may interfere with her preparation of Mr. Dubois' certiorari petition.

CONCLUSION

Mr. Dubois asks this Court to extend the time to file the Petition for Writ of Certiorari by sixty (60) days, until and including November 5, 2024.

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Respectfully Submitted,

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August 23, 2024