

App. No: _____

In the
Supreme Court of the United States

ELIZABETH PETERS YOUNG,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

**PETITIONER’S APPLICATION TO EXTEND TIME
TO FILE PETITION FOR A WRIT OF CERTIORARI**

To the Honorable Clarence Thomas, as Circuit Justice for the United States Court of Appeals for the Eleventh Circuit:

1. Petitioner Elizabeth Peters Young respectfully requests that the time to file a Petition for a Writ of Certiorari in this case be extended for thirty days to November 20, 2024. The court of appeals issued its opinion on July 22, 2024. App. A, *infra*. Absent an extension of time, the petition would be due on October 21, 2024. Petitioner is filing this Application at least ten days before the due date. *See* S.Ct. R. 13-5. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

2. Petitioner seeks review of the 2-1 opinion of the United States Court of Appeals for the Eleventh Circuit based on substantial questions relating to that court’s resolution of petitioner’s appeal. Specifically, the Eleventh Circuit’s opinion deepened a

circuit split on how courts are addressing forfeiture after this Court's ruling in *Honeycutt v. United States*, 582 U.S. 1 (2017). The Eleventh Circuit's divided opinion also raised the question of whether forfeiture of proceeds derived from private health care payors is permissible.

3. Due to case-related and other reasons, additional time is necessary and warranted for counsel to research the decisional conflicts, and prepare a clear, concise, and comprehensive petition for certiorari for the Court's review. The press of other matters makes the submission of the petition difficult absent an extension, especially because Petitioner engaged undersigned counsel just this week to represent her in the Supreme Court. Counsel agreed to take on this important matter pro bono. Counsel has been required to devote considerable time over the past several weeks to file briefs in multiple appeals prior to the date the petition is due (Tenth Circuit No. 24-8024) and a Petition for Writ of Certiorari (Supreme Court No. 24-284). Counsel also faces recently-set hearings and filing deadlines in several cases.

4. The forthcoming petition is likely to be granted in light of, among other things, the split in the Circuits on how to address for future post-*Honeycutt*.

Conclusion

For the foregoing reasons, the time to file a Petition for a Writ of Certiorari in this matter should be extended thirty days to and including November 20, 2024.

Respectfully submitted,

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