

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

MICHAEL TYRONE YOUNG,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

ON PETITION FOR WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

APPLICATION FOR EXTENSION OF TIME TO
FILE A PETITION FOR A WRIT OF CERTIORARI

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**APPLICATION FOR EXTENSION OF TIME TO FILE A
PETITION FOR A WRIT OF CERTIORARI**

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

Pursuant to Rule 13.5 of the Rules of the Supreme Court of the United States, Petitioner, Michael Tyrone Young respectfully requests that this Honorable Court grant a thirty (30) day extension of time, up to and including Monday, November 18, 2024, to file his Petition for a Writ of Certiorari. *See* Sup. Ct. R. 30.1.

BASIS FOR JURISDICTION

The United States District Court for the Middle District of Florida had original jurisdiction over this criminal case under 18 U.S.C. § 3231. The United States Court of Appeals for the Eleventh Circuit reviewed that judgment under 28 U.S.C. § 1291. The Eleventh Circuit issued its decision on July 19, 2024. Appendix A.

This Court will have jurisdiction in this case over any timely filed petition for a writ of certiorari under 28 U.S.C. § 1254(1). Under Supreme Court Rules 13.1, 13.3, and 30.1, Mr. Young's petition for a writ of certiorari is currently due October 17, 2024. He files this Application more than ten days in advance pursuant to Supreme Court Rules 13.5 and 30.2.

JUDGMENT TO BE REVIEWED

On July 19, 2024, the Eleventh Circuit affirmed Mr. Young's judgment of conviction and sentence. *See United States v. Young*, No. 23-10464, 2024 WL

3466607 (11th Cir. July 19, 2024). A copy of the opinion is attached as Appendix A. No petition for rehearing was filed.

REASONS FOR GRANTING AN EXTENSION OF TIME

Mr. Young is represented by the Federal Defender’s Office for the Middle District of Florida. The district is large, active, and busy. The Appellate Division handles direct appeals, collateral challenges to state and federal judgments, and other post-conviction motions filed under 18 U.S.C. § 3582. Currently, the Appellate Division has approximately 130 open appeals, not counting collateral challenges and miscellaneous post-conviction matters for which the Appellate Division is responsible in the district court.

In addition to representing Mr. Young, the undersigned counsel currently has 42 other clients with pending cases. He has recently filed briefs in several cases and has upcoming deadlines in others. Also, like other attorneys within the Appellate Division, the undersigned is responsible for reviewing colleagues’ briefs, preparing colleagues for oral argument, and providing trial support when called upon. In addition, the Office was temporarily closed due to impacts from Hurricane Helene.

An extension of time would allow the undersigned counsel to effectively prepare Mr. Young’s petition for certiorari while also contributing to his other clients’ pending matters and attending to his other duties within the Federal Defender’s Office. Mr. Young and the undersigned counsel respectfully submit that

the facts herein support a finding of good cause under S. Ct. R. 13.5 for a 30-day extension of time, up to and including November 18, 2024, to file his petition for certiorari.¹

CONCLUSION

Wherefore, undersigned counsel respectfully asks this Honorable Court to grant a 30-day extension of time, up to and including November 18, 2024, in which to file a petition for a writ of certiorari.

Respectfully submitted,

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Dated: October 4, 2024

¹ Under Supreme Court Rule 30.1, when the last day of a period falls on a Saturday—as it would here with a 30-day extension—the period extends to Monday, November 18, 2024.