

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

LADONIES P. STRONG, *Petitioner*,

v.

UNITED STATES, *Respondent*.

*APPLICATION FOR EXTENSION OF TIME TO FILE A PETITION FOR WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS FOR THE ARMED FORCES*

To the Honorable John G. Roberts, Jr., Chief Justice of the United States:

Petitioner, Ladonies P. Strong, U.S. Army, a soldier court-martialed at Fort Stewart, Georgia, respectfully requests an enlargement of time within which to file a petition for a writ of certiorari to and including February 17, 2025. The order of the United States Court of Appeals for the Armed Forces (“CAAF”), that denied the petition for reconsideration, was entered on September 20, 2024. Petitioner’s time to petition for certiorari in this Court expires December 19, 2024. This application is being filed more than 10 days before that date.

Copies of the majority and dissenting opinions in the CAAF are attached hereto. The jurisdiction of this Court is invoked under 28 U.S.C. § 1259(1). *See also* 10 U.S.C. § 867a(1).

This is a case with important questions that could impact not only courts-martial but also the nature and breadth of digital searches in federal and state courts. Thus, counsel require additional time to craft the petition in this case because the undersigned counsel have only limited experience drafting and filing petitions for certiorari to the Supreme Court of the United States. The undersigned counsel request the additional time to perform the necessary legal research and drafting so that the questions raised by the lower court’s decision can be properly framed and presented to this Court.

The undersigned counsel also need additional time because the supervisory undersigned counsel is the equivalent of public appellate defense counsel and practice in a jurisdiction where all those convicted enjoy an appeal as a matter of right. The supervisory counsel is operating with limited resources and large caseloads.

Wherefore, Petitioner respectfully requests that an order be entered extending her time to petition for certiorari to and including February 17, 2025.

Respectfully submitted,

December 6, 2024



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