

**CAPITAL CASE
25-**

In The

SUPREME COURT OF THE UNITED STATES

October Term 2024

**PRESTON ALTON STRONG,
*Applicant/Petitioner,***

v.

**STATE OF ARIZONA,
*Respondent.***

**Application for an Extension of Time Within
Which to File a Petition for a Writ of Certiorari to the
Arizona Supreme Court**

**APPLICATION TO THE HONORABLE JUSTICE
ELENA KAGAN AS CIRCUIT JUSTICE**

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APPLICATION FOR EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Preston Strong requests a sixty-day extension of time to file a petition for writ of certiorari, up to and including Monday, March 31, 2025.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is the Arizona Supreme Court's direct appeal affirmance in *Arizona v. Preston Alton Strong*, 555 P.3d 537 (September 3, 2024). Attachment A. The Arizona Supreme Court denied rehearing. *Arizona v. Strong*, No. CR-17-0201-AP (November 1, 2024). Attachment B.

JURISDICTION

This Court will have jurisdiction over any timely filed petition for writ of certiorari in this case pursuant to 28 U.S.C. 1254(1). Under Rules 13.1, 13.3, and 30.1 of the Rules of this Court, a petition for writ of certiorari is due

to be filed on or before January 30, 2025. In accordance with Rule 13.5, this application is being filed 10 days in advance of the filing date for the petition for a writ of certiorari.

REASONS JUSTIFYING AN EXTENSION OF TIME

Applicant respectfully requests a sixty-day extension of time within which to file a petition for writ of certiorari seeking review of the decision of the Arizona Supreme Court in this case, up to and including March 31, 2025.

Undersigned did not represent Mr. Strong during the briefing and argument before the Arizona Supreme Court and requires additional time to review the case and prepare the petition. Additionally, Ms. Hall is due to file an amended petition for postconviction relief on March 17, 2025, *State v. Cota*, No. CR2004-006577 capital case (MaricopaCty.Super.Ct.), and a petition for review in another capital case on March 24, 2025. *State v. Rienhardt*, No CR-051263 (PimaCty.Super.Ct.). An extension of time in the instant case is necessary because of undersigned counsel's commitments in both of these matters. A sixty-day extension for Applicant Mr. Strong would allow Ms. Hall the necessary amount of time to effectively prepare the petition for writ of certiorari in this case.

CONCLUSION

For the foregoing reasons, Applicant Preston Strong respectfully requests this Court grant an extension of sixty days, up to and including March 31, 2025, within which to file a petition for writ of certiorari in this case.

Respectfully submitted,

s/Julie Hall

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