

Case No.

**IN THE
SUPREME COURT OF THE UNITED STATES**

Travis Vontress,
Applicant/Petitioner,

v.

United States of America,
Respondent.

**Application for an Extension of Time Within
Which to File a Petition for a Writ of Certiorari to the
United States Court of Appeals for the Tenth Circuit**

**APPLICATION TO THE HONORABLE
JUSTICE NEIL GORSUCH AS CIRCUIT
JUSTICE**

Katayoun Azizpour Donnelly
*Member of the Tenth Circuit's CJA
Appellate Panel*
Azizpour Donnelly LLC
2373 Central Park Blvd., Suite 100
(720) 675-8584
Katy@kdonnellylaw.com

February 11, 2025
Attorney for Applicant/Petitioner

APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Travis Vontress hereby requests a 60-day extension of time, up to and including May 5, 2025, within which to file a petition for a writ of certiorari.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *United States v. Vontress*, No. 22-3119 (Dec. 6, 2024) (attached as Exhibit 1).

JURISDICTION

This Court has jurisdiction over any timely filed petition for 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 a writ of certiorari is due to be filed on or before March 6, 2025. In accordance with Rule 13.5, this application is being filed 23 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 60-day extension of time (until May 5, 2025) within which to file a petition for a writ of certiorari seeking review of the United States Court of Appeals for the Tenth Circuit in this case. The extension of time is necessary because of the press of other client business.

1. Since the denial of the petition for rehearing by the Tenth Circuit on December 6, 2024, the undersigned counsel has, among other things, been responsible for drafting opening briefs in *United States v. Cerrato-Avila*, Case No. 24-1193 (10th Cir., filed Dec. 19, 2024), *United States v. Mullins*, Case No. 24-7003 (10th Cir., filed January 13, 2025), *United States v.*

Mesmer, Case No. 24-1402 (10th Cir., due Feb. 27, 2025); reply briefs in *United States v. Cerrato-Avila*, Case No. 24-1193 (10th Cir., due March 11, 2025) and *United States v. Mullins*, Case No. 24-7003 (10th Cir., due Apr. 4, 2025); and an opening brief in *United States v. Wahhaj*, Case No. 23-2170 (10th Cir., due April 21, 2025).

2. Mr. Vontress has conferred with counsel for the government. The government does not object.

3. A 60-day extension for the Applicant would allow the undersigned counsel the time necessary to effectively contribute to all open matters, including Applicant's petition.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests that this Court grant an extension of 60 days, up to and including May 5, 2025, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,

/s/ Katayoun A. Donnelly
Katayoun A. Donnelly
Member of the Tenth Circuit's CJA
Appellate Panel
Azizpour Donnelly LLC
2373 Central Park Blvd., Suite 100
(720) 675-8584
Katy@kdonnellylaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of February 2025, a true and correct copy of the foregoing was filed with the Court and served electronically on the following:

James A. Brown
Appellate Chief
District of Kansas
444 SE Quincy Ave., Suite 290
Topeka, KS 66683
Tel: (785) 295-7683
Kan. S. Ct. No. 14254

/s/ Katayoun A. Donnelly
Katayoun A. Donnelly