

App. No: 24A709

In the
Supreme Court of the United States

GHISLAINE MAXWELL,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

To the Honorable Sonia Sotomayor, as Circuit Justice for the United States Court of Appeals for the Second Circuit:

1. Petitioner Ghislaine Maxwell respectfully requests that the time to file a Petition for a Writ of Certiorari in this case be extended for forty five days to April 10, 2025. The court of appeals issued the Order denying the Petition for Rehearing/Rehearing En Banc on November 25, 2024. Absent an extension of time, the petition would be due on Monday, February 24, 2025. 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 opinion of the United States Court of Appeals for the Second Circuit based on substantial questions relating to that court’s resolution of petitioner’s appeal. Specifically, the Second Circuit’s opinion acknowledged that it

deepened a circuit split on whether a plea agreement is binding on federal prosecutors in districts other than the one in which it is entered. *See United States v. Maxwell*, 118 F. 4th 256 n.11 (2nd Cir. 2024) (“recogniz[ing] that circuits have been split on this issue”).

3. Undersigned counsel was just retained yesterday, on January 14, 2024. 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. For example, Counsel is scheduled to commence a multi-defendant trial on March 3, 2025, *United States v. Diego Sanudo Sanchez Chocron*, Southern District of Florida, case number 24-cr-20155-RAR(s). In addition, counsel is due to file a reply brief in this Court in *Elizabeth Peters Young v. United States*, case number 24-571, shortly after the Government files its response on January 22, 2025.

Therefore, because of the importance of this issue, and the need to draft a meaningful petition on such short notice, undersigned counsel is respectfully requesting an additional 45 days in the matter to file until April 10, 2025.

Conclusion

For the foregoing reasons, the time to file a Petition for a Writ of Certiorari in this matter should be extended forty five days to and including April 10, 2025.

Respectfully submitted,

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