```c
Request *select_request(Request *scheduled[], int N, int policy) {

    Request *r = NULL;
    if (N == 0) {
        // no scheduled requests
        return r;
    }

    switch (policy) {
        case FCFS:
            // returns the first scheduled request
            r = scheduled[0];
            break;
        case SJF:
            // returns the request with the smallest estimated time
            r = scheduled[0];
            int min_est_time = get_est_time(r);

            for (int i = 0; i < N; i++) {
                if (get_est_time(scheduled[i]) < min_est_time) {
                    r = scheduled[i];
                    min_est_time = get_est_time(r);
                }
            }
            break;
        case PES:
            // returns the request with the highest priority
            r = scheduled[0];
            int max_priority = get_est_time(r);

            for (int i = 0; i < N; i++) {
                if (get_est_time(scheduled[i]) > max_priority) {
                    r = scheduled[i];
                    max_priority = get_est_time(r);
                }
            }
            break;
        default:
            printf("Unknown scheduling policy.\n");
            break;
    }
    return clone_request(r);
}
```