

SALVADOR ORTIZ-URESTI, :

Petitioner

UNITED STATES OF AMERICA :

Keith M. Donoghue, Assistant Federal Defender, Federal Community Defender Office
for the Eastern District of Pennsylvania, respectfully requests the granting of the instant
application for a 30-day extension of time for filing of a petition for writ of certiorari, and in
support represents as follows:

3. Counsel has been unable to complete the petition given that he has been occupied preparing the opening brief and joint appendix filed in *United States v. Joel Scott*, Third Cir. No.

18-1157, on June 7, 2018, as well as the opening brief and joint appendix in *United States v. Donte Island*, Third Cir. No. 17-3826, filed on June 1, 2018. In addition, counsel is reviewing and/or preparing briefing in additional matters before the Third Circuit.

4. Counsel respectfully requests an additional 30 days in which to complete the petition for writ of certiorari.

WHEREFORE, for all the foregoing reasons of good cause, Keith M. Donoghue, Assistant Federal Defender, on behalf of the Federal Community Defender Office for the Eastern District of Pennsylvania, and on behalf of Salvador Ortiz-Uresti, Petitioner, respectfully requests that this Court grant this motion for a 30-day extension of time for filing of a petition for writ of certiorari.

Respectfully submitted,

/s/ Keith M. Donoghue

KEITH M. DONOGHUE

Assistant Federal Defender

JACOB SCHUMAN

Research and Writing Attorney

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CERTIFICATE OF SERVICE

I, Keith M. Donoghue, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that I have electronically filed this *Application for Extension of Time for Filing Petition for Writ of Certiorari* through the Electronic Filing System (EFS) of the Supreme Court of the United States and served copies upon Assistant United States Attorney Jonathan B. Ortiz, by hand delivery to his office located at 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106, and upon Noel Francisco, Solicitor General of the United States, by first class U.S. mail addressed to United States Department of Justice, Room 5614, 950 Pennsylvania Avenue, NW, Washington, DC 20530-0001.

/s/ Keith M. Donoghue
KEITH M. DONOGHUE

Dated: June 8, 2018