

GABRIEL WERDENE, :

Petitioner

UNITED STATES OF AMERICA :

Brett G. Sweitzer, Assistant Federal Defender, Chief of Appeals, 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:

2. Pursuant to Rule 13.1, Mr. Werdene's petition for writ of certiorari was due May 22, 2018. That date was subsequently extended until June 21, 2018, pursuant to undersigned counsel's written 30-day request.

3. Counsel has been unable to complete the petition given that he had been occupied preparing opening briefs and joint appendices filed in the Third Circuit Court of Appeals in *United States v. Anthony Robinson*, Third Cir. No. 18-1160, on May 30, 2018; and *United States*

v. Lamar Sowell, Third Cir. No. 17-3504, on May 15, 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, Brett G. Sweitzer, Assistant Federal Defender, Chief of Appeals, on behalf of the Federal Community Defender Office for the Eastern District of Pennsylvania, and on behalf of Gabriel Werdene, 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/ Brett G. Sweitzer

BRETT G. SWEITZER

Assistant Federal Defender

Chief of Appeals

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CERTIFICATE OF SERVICE

I, Brett G. Sweitzer, Assistant Federal Defender, Chief of Appeals, 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 Michelle L. Morgan, by hand delivery to her 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/ Brett G. Sweitzer
BRETT G. SWEITZER

Dated: June 7, 2018