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July 10, 2019

Supreme Court of the United States  
Office of the Clerk – Scott S. Harris  
One First Street, NE  
Washington, DC 20543

*Re: Daniel Rodriguez, Julio Rivera-Lopez, Kristian Torres v. United States of America*  
No. 18-9266

Dear Mr. Harris:

In light of the Court's opinion in *United States v. Davis*, No. 18-431, issued June 24, 2019, the above petitioners respectfully request that the Court grant their petition for writ of *certiorari*, vacate the order of the United States Court of Appeals for the Third Circuit and remand to that court for further proceedings. Petitioners were convicted of conspiring to commit Hobbs Act robbery and conspiring to possess a firearm in furtherance of crimes of violence (the conspiracy to commit Hobbs Act robbery). The district court held that their offenses did not satisfy the definition of a crime of violence under the elements clause in 18 U.S.C. § 924(c)(3)(A), but that they did satisfy the definition in the residual clause of Section 924(c)(3)(B). Because the Court in *Davis* concluded that the Section 924(c)(3)(B) is unconstitutionally vague, the petitioners respectfully request that their petitions be granted, the Third Circuit's judgment vacated, and the cases remanded to that court for further proceedings.

Sincerely,

/s/ Frederick W. Ulrich  
Frederick W. Ulrich  
Assistant Federal Public Defender

cc: Noel J. Francisco, Solicitor General of the United States