

IN THE SUPREME COURT
OF THE UNITED STATES

CARLOS CRUZ-RIVERA,

Petitioner,

v.

UNITED STATES,

Respondent.

:
:
: No. _____
:
:
:
:
:
:
:
:
:

PETITIONER’S APPLICATION FOR EXTENSION OF
TIME TO FILE PETITION FOR WRIT OF CERTIORARI
TO THE FIRST CIRCUIT.

To the Hon. Stephen Breyer, as Circuit Justice for the First
Circuit:

Petitioner Carlos Cruz-Rivera, through appellate counsel
appointed under the Criminal Justice Act, 18 U.S.C. §
3006A(d)(6), Ines McGillion, Esq., respectfully moves the Court
pursuant to Supreme Court Rules 22 and 13(5) for an extension of
60 days, from December 13, 2018 to February 11, 2019, to file his
petition for a writ of certiorari to review the First Circuit’s
September 14, 2018 judgment and opinion (enclosed). The

defendant did not file a petition for rehearing. The Court's jurisdiction is based on 28 U.S.C. § 1257.

1. The date on which a petition for writ of certiorari would otherwise be due, if not extended, is December 13, 2018. Petitioner is filing this application well in advance, and thus more than the minimum ten days before that date. See S. Ct. Rule 13(5).
2. The undersigned has additional briefing responsibilities in Massachusetts state courts and in the Second Circuit during the relevant time period.
3. The undersigned is unable to work during one week in November, limiting the time that would otherwise be available to prepare a petition.
4. In addition, the undersigned is a solo practitioner with no employees and the requested time is reasonably necessary to enable preparation of a petition.

Respectfully submitted,

/s/ Ines McGillion

Dated: Sept. 26, 2018

Ines de Crombrugghe McGillion
S. Ct. Bar No. 295917
USCOA No. 1159609

INES MCGILLION LAW OFFICES, PLLC
P.O. Box 212
126 Main Street
Putney, VT 05346
(802) 258-6441
ines@mcgillionlaw.com

CERTIFICATE OF SERVICE

I, Ines de C. McGillion, hereby certify that, on this date and pursuant to Supreme Court Rule 29, I mailed the foregoing Application to effect service upon the following party:

Solicitor General
United States Department of Justice
950 Pennsylvania Ave., N.W.
Washington, DC 20530-0001

Dated: Sept. 26, 2018

/s/ Ines McGillion

Ines de C. McGillion
USCOA No. 1159609

INES MCGILLION LAW OFFICES, PLLC
P.O. Box 212
126 Main Street
Putney, VT 05346
(802) 258-6441
ines@mcgillionlaw.com

Attorney for Defendant-Appellant