

Zoë Dolan

www.zoedolan.com
zdolan@gmail.com

Attorney At Law
Admitted NY & CA
(347) 301-5180

PO Box 32044
Los Angeles, CA 90032

October 1, 2018

The Honorable John G. Roberts
As Circuit Justice for the Ninth Circuit
Supreme Court of the United States
1 First St. NE Washington, DC 20543

Re: *United States v. Antonio Anguiano*
16-50448 (9th Cir.)
Undocketed as yet in the United States Supreme Court

Dear Chief Justice Roberts:

This letter is submitted to request a 60-day extension of the time in which to file a petition for *certiorari* in the above-referenced matter – from November 25, 2018 to January 24, 2019 – for the reasons that follow.

This case is relatively complex, implicating questions of apparently first impression with respect to the constitutionality of the Criminal Justice Act, 18 U.S.C. § 3006A, as applied here and in principle. Although I am working diligently on framing research and analysis for the *cert* petition, I have been and will be unable to complete the submission in a timely matter due to professional obligations in other matters – including several Criminal Justice Act cases such as this one. Among other things, I am currently scheduled to begin trial in *United States v. Lang*, 16-cr-376-JAK-2, which involves voluminous discovery and an extensive prior procedural history, in the United States District Court for the Central District of California, on December 12, 2018. I am also engaged in research and preparation for pretrial motion practice in *United States v. Liburd*, 17-296-PKC, in the United States District Court for the Eastern District of New York. I also anticipate work-related travel over the next three months. Meanwhile, of course, I will be balancing family and personal commitments over the upcoming holiday season.

The United States Court of Appeals for the Ninth Circuit denied a petition for rehearing *en banc* on August 27, 2018, and this application is the first and, I anticipate, only request for an extension.

Sincerely,

s/
Zoë Dolan

Cc: Mr. Antonio Anguiano