
No.

IN THE SUPREME COURT OF THE UNITED STATES
OCTOBER TERM 2017

HUGO PLIEGO-HERNANDEZ,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

**APPLICATION FOR EXTENSION OF TIME WITHIN WHICH
TO FILE PETITION FOR WRIT OF CERTIORARI**

To the Honorable Elena Kagan, Associate Justice of the Supreme Court
and Circuit Justice for the Seventh Circuit:

The Petitioner, HUGO PLIEGO-HERNANDEZ, respectfully requests,
pursuant to Sup. Ct. R. 13.5 and 30, the issuance of an order extending the
time for filing a petition for writ of certiorari from its present due date of July
24, 2018, to September 21, 2018. In support of this application, petitioner
states as follows:

1. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. §
1254(1).

2. Counsel was appointed pursuant to the Criminal Justice Act of 1964 (18 U.S.C. §3006A).

3. The final order of the Court of Appeals for the Seventh Circuit in this case is reported at *United States v. Pliego-Hernandez*, 720 Fed. Appx. 790 (7th Cir. 2018) and is attached to this motion.

4. The judgment sought to be reviewed was entered on April 15, 2018. No petition for rehearing was filed.

5. Petitioner's counsel is requesting an extension of time because he has not had adequate opportunity to develop the petitioner's issues for this Court. Petitioner's counsel has primary responsibility for all post-conviction cases arising in the Northern District of Illinois as a result of this Court's decision in *Johnson v. United States*, 135 S. Ct. 2551 (2015). Currently, counsel has that responsibility for over 40 cases. These cases require extended research and analysis into difficult legal issues. Counsel has been especially busy as a result of this Court's recent decision in *Sessions v. Dimaya*, 138 S. Ct. 1204 (2018).

WHEREFORE, it is respectfully requested that an extension of time to file a petition for writ of certiorari be granted from the present due date of July 24, 2018 to September 21, 2018.

Dated July 9, 2018, at Chicago, Illinois.

Respectfully submitted,

Federal Defender Program
John F. Murphy,
Executive Director

By: */s/ William H. Theis*
William H. Theis
Counsel of Record
For the Petitioner

FEDERAL DEFENDER PROGRAM
55 E. Monroe Street, Suite 2800
Chicago, IL 60603
312/621-8300