

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

United States of America,
Petitioner,

-v-

Robert Rang
Respondent.

On petition for writ of certiorari to the
United States Court of Appeals for the First Circuit

UNOPPOSED MOTION FOR EXTENSION OF DEADLINE TO FILE CERT PETITION

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ATTORNEY FOR PETITIONER

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To the Supreme Court of the United States:

Robert Rang, a federal inmate, respectfully files this motion to extend the deadline for his cert petition from June 24, 2019 to **July 15, 2019**. As cause, Rang would show the Court as follows:

- 1) The Circuit Court's opinion issued March 26, 2019. 919 F.3d 113 (1st Cir. 2019).
- 2) The Panel Opinion stated the potential Circuit split as follows:

Implicit in Rang's position is the argument that "sexual activity" requires interpersonal physical contact, a question that has caused division amongst

the circuits. *Compare United States v. Fugit*, 703 F.3d 248, 256 (4th Cir. 2012) (interpreting “sexual activity” as conduct connected with the “active pursuit of libidinal gratification” on the part of an individual and therefore not requiring physical contact), with *United States v. Taylor*, 640 F.3d 255, 259-60 (7th Cir. 2011) (applying the rule of lenity to interpret “sexual activity” as requiring physical contact).

Id. at 120.

- 3) The reason for the request is that Counsel has a forthcoming execution in a capital habeas case for an inmate on Texas’s death row, Mark Soliz.
- 4) The request is made so that Rang’s cert petition receives its condign attention.

- 5) No further request for extension will be made.

Respectfully submitted this 17th day of June, 2019,


By: _____
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ATTORNEY FOR PETITIONER

CERTIFICATE OF CONFERENCE

I hereby certify that on June 16, 2019, I conferred with AUSA Anne Paruti; she is **UNOPPOSED**.



Seth Kretzer

CERTIFICATE OF MAILING

I hereby certify that, on the 17th day of June 2019, this pleading was deposited with the U.S. Postal Service, in an envelope or package correctly addressed, with sufficient postage to assure delivery by certified first-class mail, R.R.R.



Seth Kretzer

