

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

United States of America,
Respondent,

-v-

RICHARD VALENTINI,
Petitioner.

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:

RICHARD VALENTINI, a federal inmate, respectfully files this motion to extend the deadline for his cert petition from March 9 **to April 6, 2020.** As cause, your Appellant would show the Court as follows:

- 1) The Circuit Court's opinion issued December 10, 2019. 944 F.3d 343 (1st Cir. 2019). *United States v. Valentini* is a Hobbs Act appeal argued before the First Circuit in late 2019.
- 2) The reason for the request is that Counsel was not involved in this case in the trial court but was appointed anew for the appeal.
- 3) Also, the week before last, Counsel presented oral argument in the Texas First Court of Appeals in *State v. Bond*, 01-18-00741-CR, a complicated sexual assault case where neither victim could identify the defendant as the attacker and DNA was exculpatory.
- 4) Counsel also had last week a mediation this week in San Antonio in a receiver case arising from a wrongful death verdict in which a husband killed his wife.
- 5) The request is made so that Valentini's cert petition receives its condign attention.
- 6) No further request for extension will be made.

Respectfully submitted this 17th day of February, 2020,

By: 
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ATTORNEY FOR PETITIONER

CERTIFICATE OF CONFERENCE

I hereby certify that on February 13, 2020, I called the Solicitor General's office; the Government is **UNOPPOSED**.



Seth Kretzer

CERTIFICATE OF MAILING

I hereby certify that, on the 17th day of February 2020, 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

