NO
In The
Supreme Court of the United States
TERM, 20
Luis Alfredo Moreira Bravo- Petitioner,
vs.
United States of America - Respondent.
Application for Extension of Time Within Which to File for a Writ of Certiorari to the United States Court of Appeals for the Eighth Circuit
APPLICATION DIRECTED TO THE HONORABLE JUSTICE BRETT KAVANAUGH AS CIRCUIT JUSTICE

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ATTORNEY FOR PETITIONER

Comes Now petitioner Luis Alfredo Moreira Bravo, through his attorney of record, Assistant Federal Public Defender Heather Quick, who, pursuant to Supreme Court Rule 13.5, requests an additional thirty days in which to file a petition in this Court seeking certiorari to the Eighth Circuit Court of Appeals, up through Friday, July 20, 2023. In support, counsel submits as follows:

JUDGMENT FOR WHICH REVIEW IS SOUGHT

Petitioner seeks an extension to file a petition for writ of certiorari. Petitioner is requesting review of the judgment issued by the Eighth Circuit Court of Appeals on December 27, 2022, affirming the petitioner's conviction and sentence. Petitioner filed a timely motion for petition for rehearing en banc, which the Eighth Circuit denied on March 22, 2023.

JURISDICTION

This Court will have jurisdiction over the timely filed petition pursuant to 28 U.S.C. § 1254(1). Under Supreme Court Rules 13.1, 13.3, and 30.1, the current deadline for the filing of a petition for writ of certiorari is Tuesday, June 20, 2023. Petitioner files this request for additional time at least 10 days before the date the petition is currently due, in compliance with Supreme Court Rule 13.5.

REASONS FOR APPLICATION FOR EXTENSION

Defense counsel has a variety of other obligations before the federal judiciary.

For example, in the last three weeks counsel of record has submitted two appellant's briefs and a petition for rehearing to the Eighth Circuit Court of Appeals. Counsel of

record has also submitted two petitions for writ of certiorari to this Court in that time. Further, in the next three weeks, counsel of record has eight initial briefs due to the Eighth Circuit Court of Appeals. The undersigned also has a petition for a writ of certiorari due in another matter to this Court. These obligations will make it difficult

for counsel to finalize and file a satisfactory petition by the current deadline, despite

counsel's diligent efforts to do so.

CONCLUSION

For the foregoing reasons, the petitioner respectfully requests that this Court grant a 30-day extension, to and including July 20, 2023, in which to file a petition for a writ of certiorari.

RESPECTFULLY SUBMITTED,

/s/ Heather Quick

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