

No. _____

IN THE
Supreme Court of the United States

LUIS MIGUEL SIERRA-AYALA,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

*ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT*

**MOTION FOR EXTENSION OF TIME TO FILE
PETITION FOR A WRIT OF CERTIORARI**

Petitioner respectfully requests a thirty-day extension of time to file a petition for a writ of certiorari from the U.S. Court of Appeals for the First Circuit's decision in *United States v. Sierra-Ayala*, No. 20-1145, 39 F.4th 1 (1st Cir. July 5, 2022), pet. reh'g denied Oct. 17, 2022.

The undersigned has been working diligently to research and prepare a certiorari petition, but preparation is still underway. Given the breadth of the record, the nature of the issues on appeal, and counsel's other responsibilities, we

respectfully submit good cause exists for extending this deadline by thirty days. I note that my court-assigned workload has been unexpectedly and severely impacted since Mr. Sierra-Ayala's petition for rehearing was denied on Oct. 17, 2022. At that time, I was engaged in time-sensitive en banc litigation in *United States v. Flores-González*, No. 19-2204 (1st Cir.), filing briefs October 23, 2022 & November 11, 2022, and arguing the case on November 18, 2022. Thereafter, I filed the reply brief in *United States v. Reyes-Correa*, No. 21-1913 (1st Cir. filed Dec. 19, 2022). This morning, I filed a nearly 13,000-word consolidated brief in *United States v. Mojica-Ramos*, Nos. 22-1204, 22-1205, and have another consolidated brief due today in *United States v. Rosa-Borges*, Nos. 22-1195, 22-1218. In addition, my expedited reply brief in *United States v. Pérez-Greaux*, No. 21-1699, is due January 12, 2023.

As such, we anticipate needing an addition month beyond the present due date to complete it.

Respectfully submitted.

Executed on January 4, 2023, in San Juan, Puerto Rico.

*s/*Kevin E. Lerman
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