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IN THE
SUPREME COURT OF THE UNITED STATES

Mary Gonzales,

Petitioner,

v.

United States of America,

Respondent.

On Petition for Writ of Certiorari to the
United States Court of Appeals for the Tenth Circuit

**APPLICATION FOR EXTENSION OF TIME
TO FILE PETITION FOR WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE TENTH CIRCUIT**

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To the Honorable Neil M. Gorsuch, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Tenth Circuit:

Petitioner Mary Gonzales, by undersigned counsel, prays for a 30-day extension of time, to and including Monday, April 17, 2023, in which to file a petition for a writ of certiorari. In support of this request, counsel states as follows:

1. On December 16, 2022, the United States Court of Appeals for the Tenth Circuit affirmed Ms. Gonzales's convictions for possessing a firearm, possessing controlled substances with intent to distribute, and possessing a firearm in furtherance of a drug trafficking crime. (Attachment A.)

2. Ms. Gonzales has ninety days from that date to file a petition for a writ of certiorari. Sup. Ct. R. 13.3. The petition is therefore due on March 16, 2023. This application is being filed at least ten days before that date.

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

4. Since the Tenth Circuit Court of Appeals' order and judgment in this case, undersigned counsel has filed a reply brief in *United States v. Cruz-Cruz*, 22-2050 & 22-2051 (filed February 23) and an opening brief in *United States v. Hernandez-Quintero*, 22-8074 (filed February 24). Counsel has also been working on several other appeals cases, including *United States v. Swan*, 22-6132 (opening brief due March 6); *United States v. Farris*, 22-1412 (opening brief due March 23); and *United States v. Borne*, 23-8008 (opening brief due April 10).

5. Counsel has also been assisting with several cases in the Districts of Colorado and Wyoming, including *United States v. Aldaco Ponce*, 1:22-cr-00210-DDD (District of Colorado); *United States v. Ming*, 1:22-cr-00261-DDD (District of Colorado); *United States v. Quinones*, 1:22-cr-00295-RMR (District of Colorado); and *United States v. Schutz*, 1:22-cr-00132-ABJ (District of Wyoming).

6. Given their own current caseloads, as well as the work undersigned counsel has put into this case as counsel of record, no other attorney in the Office of the Federal Public Defender is in a position to file the petition by its current due date.

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For these reasons, Petitioner Mary Gonzales respectfully requests that an order be entered extending the time in which to petition for a writ of certiorari by 30 days, to and including Monday, April 17, 2023. *See* Sup. Ct. R. 13.5.

Respectfully submitted,

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