

No:

IN THE
SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 2022

PAULINO VASQUEZ-RIJO,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

**MOTION FOR AN EXTENSION OF TIME
WITHIN WHICH TO FILE A PETITION FOR WRIT OF
CERTIORARI TO THE UNITED STATES COURT OF
APPEALS FOR THE ELEVENTH CIRCUIT**

**TO THE HONORABLE CLARENCE THOMAS, ASSOCIATE
JUSTICE OF THE SUPREME COURT OF THE UNITED
STATES AND CIRCUIT JUSTICE FOR THE ELEVENTH
CIRCUIT:**

Pursuant to Supreme Court Rules 13.5, 22, and 30.3, Paulino Vasquez-Rijo respectfully requests a sixty-day extension of time, to and including May 27, 2023, within which to file a petition for writ of certiorari to the United States Court of Appeals for the Eleventh Circuit. Mr. Vasquez-Rijo has not previously sought an extension of time from this Court.

This is a case that raises jurisdictional issues under the Maritime Drug Law Enforcement Act (MDLE), 46 U.S.C. §70501, et. seq., from the Southern District of Florida. Mr. Vasquez-Rijo appealed his convictions, and the opinion and judgment of the court of appeals was entered on December 28, 2022. Unless extended, the time within which to file a petition for writ of certiorari will expire on March 28, 2023. Petitioner is filing this Application at least ten days before the filing date. See S.Ct. R. 13.5. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1). A copy of the court of appeals' opinion is attached as Exhibit A.

Undersigned counsel is currently working other matters requiring her full-time effort, including *United States v. Joselin*, Case No. 22-13739 (11th Circuit); *United States v. Willis*, 22-13793 (11th Circuit); *Gonzalez v. United States*, Case No. (22-22940 (S.D. Fla.); and *United States v. Grushko*, 20-10438 (11th Cir.).

Counsel believes that additional time will be important for the careful preparation of the petition for writ of certiorari in this matter. No party will be prejudiced by the granting of the extension.

Accordingly, petitioner respectfully requests that an order be entered extending the time to file a petition for writ of certiorari by sixty days, to and including May 27, 2023.

MICHAEL CARUSO
FEDERAL PUBLIC DEFENDER

Fort Lauderdale, Florida
March 3, 2023

By: s/Margaret Foldes
*Margaret Foldes
Assistant Federal Public Defender
*Counsel for Petitioner
1 East Broward Blvd., Suite 1100
Fort Lauderdale, Florida 33301-1100
Telephone No. (954) 356-7436
Fax (954) 356-7556
Margaret_Foldes@fd.org