

NO:

IN THE
SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 2022

RENZO ALEGRE,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

**APPLICATION FOR AN EXTENSION OF TIME WITHIN
WHICH TO FILE A PETITION FOR A WRIT OF CERTIORARI FROM THE
JUDGMENT OF 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, Renzo Alegre respectfully requests a sixty-day extension of time from March 30, 2023, to and including May 29, 2023, within which to file a petition for a writ of certiorari from the judgment of the United States Court of Appeals for the Eleventh Circuit. *See* S.Ct. R. 13.5. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1).

Petitioner was charged with and pled guilty to possessing child pornography in violation of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2). On January 13, 2022, the district court sentenced him to a 48-month term of imprisonment, to be followed by 20 years supervised release.

On appeal, Petitioner challenged both the procedural and substantive unreasonableness of his sentence, as well as the constitutionality of one of the conditions of his supervised release. The Eleventh Circuit, however, affirmed. *United States v. Alegre*, 2022 WL 18005680 (11th Cir. Dec. 30, 2022).

Over the last two weeks, undersigned counsel filed an initial brief in *United States v. Richardson*, Eleventh Circuit Case No. 22-11921, and presented oral argument in *United States v. Williams*, Eleventh Circuit Case No. 21-12877. Counsel has another initial and reply brief due in the Eleventh Circuit before the end of March. Due to these competing case matters, and because counsel is scheduled to be out of the office during the first two weeks of April, an additional sixty (60) days are necessary to file the petition in this case.

Since the time within which to file a petition for writ of certiorari in this case will expire on March 30, 2030 unless extended, Petitioner respectfully requests that an order be entered extending his time to file a petition for writ of certiorari by sixty days. Counsel is requesting until May 29th to file Mr. Alegre's petition.

Neither the government nor Mr. Alegre would be prejudiced by such an extension.

Respectfully submitted,

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FEDERAL PUBLIC DEFENDER

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March 6, 2023
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