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IN THE  
SUPREME COURT OF THE UNITED STATES

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AHMAD SALTI,

Petitioner,

v.

United States of America,

Respondent.

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

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**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 Ahmad Salti, by undersigned counsel, prays for a 30-day extension of time, to and including June 7, 2023, in which to file a petition for a writ of certiorari.

In support of this request, counsel states as follows:

1. On February 6, 2023, the United States Court of Appeals for the Tenth Circuit affirmed the district court's order regarding Mr. Salti's restitution payments that was the subject of his appeal. (Attachment A.)

2. Mr. Salti 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 May 8, 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. In the last month, counsel has filed in the Tenth Circuit reply briefs in *United States v. Waffle*, 22-5084 (filed April 5) and *United States v. Morrison*, 22-5014 (filed April 17), the opening brief in *United States v. Baca*, 22-1377 (filed April 17), and presented oral argument in *United States v. Warrington*, 22-7003 (argued March 23). Counsel's current responsibilities in the circuit include drafting the answer brief in *United States v. Daniels*, 22-1378 (currently due April 28; 30-day extension requested), perfecting the appeal in *United States v. Talbot*, 23-8025 (preliminary documents due April 28), and next month, preparing for oral argument in *United States v. Morrison*,

22-5014 (set for May 18), and in district court include working on three motions for compassionate release that must be finalized in the next month, a motion for property return and a complicated motion to unseal by early May, and at least two pretrial motions to dismiss anticipated in the coming weeks. Beyond these filings, counsel also is occupied with ongoing work with colleagues in evaluating legal issues in a number of cases in the district courts of Colorado and Wyoming, and supervisory duties also take up a significant amount of counsel's time. Finally, counsel will be out of the office traveling to and attending a training program on April 27th and April 28th, and visiting an incarcerated client out of state on May 4th and May 5th, and also will be occupied in May with preparing part of a continuing legal education training in which he is participating as a presenter in mid-June.

5. Counsel recently transferred two appellate cases to other attorneys, *United States v. Redd*, 22-1454 (substitution filed March 22) and *United States v. Taylor*, 22-1392 & 22-1442 (substitution filed April 11) to better balance his workload and make time for other impending deadlines, such as the petition in this case.

Nonetheless, counsel requires the requested extension in order to complete evaluating and preparing this petition.

6. Given their own caseloads, as well as the work undersigned counsel has already 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 Ahmad Salti respectfully requests that an order be entered extending the time in which to file a petition for a writ of certiorari by 30 days, to and including June 7, 2023. *See* Sup. Ct. R. 13.5.

Respectfully submitted,

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*/s/ John C. Arceci*

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