

**EXTENSION OF TIME REQUEST FOR  
A PETITION FOR WRIT OF CERTIORARI**

No. \_\_\_\_\_

In The Supreme Court of the United States

Rafael Espinal-Mieses, Petitioner, v.  
United States of America, Respondent.

**APPLICATION FOR EXTENSION OF TIME TO FILE  
PETITION FOR WRIT OF CERTIORARI TO THE  
FIRST CIRCUIT COURT OF APPEALS**

To the Honorable John G. Roberts, Jr.:

Petitioner, Rafael Espinal-Mieses, respectfully requests an additional forty-five days, up to and including November 9, 2023, to file his Petition for Writ of Certiorari. The United States Court of Appeals for the First Circuit entered a judgment on June 26, 2023. Absent an extension of time, the Petition for Writ of Certiorari would be due by September 25, 2023. Petitioner is filing this Application more than ten days prior to that due date.

Undersigned counsel currently has oral argument scheduled for September 14, September 19, and September 21. In addition, undersigned currently has an initial brief due on September 22, and a federal initial brief due with the First Circuit Court of Appeals on September 25. Due to undersigned's current workload, he has not been able to devote an adequate amount of time to finalize the Petition for Writ of Certiorari and respectfully requests the additional time.

A copy of the First Circuit's June 26, 2023 Judgment subject to review by this Court is enclosed with this Application, This Court has jurisdiction to review the June 26, 2023 decision pursuant to 28 U.S.C. § 1254(1).

Respectfully submitted,

/s/ Michael M. Brownlee

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September 14, 2023

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