

No. _____

IN THE SUPREME COURT OF THE UNITED STATES OF AMERICA

DANIEL RAUL SANTIAGO VASQUEZ,

Petitioner,

v.

STATE OF OKLAHOMA,

Respondent.

**APPLICATION FOR EXTENSION OF TIME
IN WHICH TO FILE PETITION FOR A WRIT OF CERTIORARI TO
THE OKLAHOMA COURT OF CRIMINAL APPEALS**

TO: THE HONORABLE NEIL M. GORSUCH, ASSOCIATE JUSTICE OF THE UNITED STATES SUPREME COURT, AND CIRCUIT JUSTICE FOR THE TENTH CIRCUIT:

Pursuant to United States Supreme Court Rule 13.5, Petitioner requests a sixty (60) day extension of time in which to file his Petition for a Writ of certiorari in this Court up to and including Monday, August 25, 2025 (sixty (60) days from the current deadline of Tuesday, June 24, 2025).¹

In support of this Application, Petitioner would show the Court the following:

1. Petitioner, Daniel Raul Santiago Vasquez, is an Oklahoma death row inmate housed currently at the Oklahoma State Penitentiary in McAlester, Oklahoma.
2. Petitioner seeks review in this Court of the opinion of the Oklahoma Court of

¹ 60 days from June 24, 2025, falls on Saturday, August 23, 2025; thus, Petitioner seeks an extension to the following Monday, August 25, 2025.

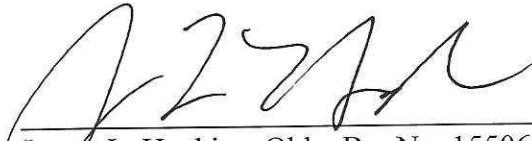
Criminal Appeals affirming the issues raised in his direct appeal. *See* attached Exhibit 1 (Opinion on Direct Appeal).

3. The judgment of the Oklahoma Court of Criminal Appeals was entered on January 30, 2025.
4. Petitioner's motion for rehearing was considered, and denied on March 26, 2025. *See* attached Exhibit 2 (Order Denying Rehearing).
5. Petitioner's time in which to petition this Court for a Writ of Certiorari expires on Tuesday, June 24, 2025 (90 days calculated from March 26, 2025).
6. Pursuant to United States Supreme Court Rule 13.5, this Application is being filed more than ten days before June 24, 2025.
7. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1254(1).
8. This case is a capital murder case out of Oklahoma where Petitioner has been sentenced to death.
9. Although counsel had been retained to prepare the direct appeal to the Oklahoma Court of Criminal Appeals, Petitioner is now indigent and counsel is proceeding to this Court on a *pro bono* basis.
10. Counsel requests an extension in this case because of the complex nature of the factual and legal disposition of the direct appeal, the fact that counsel is working *pro bono* at this point, and counsel's obligations in other cases, including a Petition for Certiorari in this Court in *Holt v. State*, No. F-2023-533 (Okla. Crim. App.), due on or before July 2, 2025; and preparation of a brief in support of habeas petition in *Calhoun v. Louthan*, No. 25-cv-52-JDR-JFJ (N.D. Okla.), filed April 30, 2025.

11. Petitioner has not previously petitioned this Court for an extension of time in which to file a Petition for a Writ of Certiorari.
12. Counsel avers that this Application is made in good faith and not for purposes of delay.

Wherefore, Petitioner requests respectfully that an Order issue establishing the due date for Petitioner's Petition for a Writ of Certiorari as **Monday, August 25, 2025.**

Dated this 13th day of June, 2020.



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COUNSEL FOR PETITIONER

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CERTIFICATE OF SERVICE

I, James L. Hankins, a member of the Bar of this Court, certify that I have this 13th day of June, 2025, served a copy of Petitioner's Application for Extension of Time in which to File Petition for Writ of Certiorari to the Oklahoma Court of Criminal Appeals, by depositing the copy in the United States Mail, first-class postage prepaid, addressed to:

Christina A. Burns
Assistant Attorney General
313 NE 21st St.
Oklahoma City, Oklahoma 73105
Phone: 405.521.3921

All parties required to be served have been served.



James L. Hankins