

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

**IN THE**  
**Supreme Court of the United States**

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J.A. MASTERS INVESTMENTS; K.G. INVESTMENTS  
PETITIONERS/APPLICANTS,

V,

EDUARDO BELTRAMINI  
RESPONDENT

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**APPLICATION FOR AN EXTENSION OF TIME  
TO FILE A PETITION FOR A WRIT OF CERTIORARI TO THE  
FIFTH CIRCUIT COURT OF APPEALS**

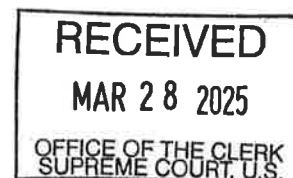
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Dated: 03/22/2025

Attorney for Petitioners J.A. Masters Investments and K.G. Investments



### **Corporate Disclosure Statement**

Pursuant to Supreme Court Rule 29.6, Applicants J.A. MASTERS INVESTMENTS and K.G. INVESTMENTS state that it has no parent corporation and that no publicly held company owns 10% or more of Applicant's stock.

### **APPLICATION**

To the Honorable Samuel Alito, as Circuit Justice for the United States Court of Appeals for the Fifth Circuit Court of Appeals:

Pursuant to Rule 13.5 of the Rules of this Court and 28 U.S.C. § 2101(c), applicant Yasmin Estrella, Esq. respectfully requests a 60-day extension of time, to and including June 2, 2025, within which to file a petition for a writ of certiorari to review the judgment of the Fifth Circuit Court of Appeals in this case. The current deadline for filing the petition is currently, April 3, 2025.

The Fifth Circuit Court of Appeals issued its decision on January 3, 2025. See (Appendix A). J.A. Masters Investments, and K.G. Investments will seek to file a petition for certiorari. Unless extended, the time to file a petition for certiorari will expire on April 3, 2025. This application is being filed more than 10 days before the petition is currently due April 3, 2025, and is supported by good cause, as set forth below. See Sup. Ct. R. 13.5. The jurisdiction of this Court would be invoked under 28 U.S.C. § 1257(a).

Applicant respectfully requests a sixty (60) day extension, from April 3, 2025, to June 2, 2025, to file a petition for a writ of certiorari. This request is made in good faith and not for the purpose of delay.

## **BACKGROUND**

Respondent owned and operated Planet Futbol Event Management (hereinafter “PFEM” or “PE”), a company that promoted soccer events. Petitioners’ principal, Jefferson Guevara Castro, acted as a principal for KG Investment and JA Masters Investments. Their first business dealing began with the soccer match of Honduras v. El Salvador at BBVA Stadium in Houston, TX. Under the contract, Petitioners agreed to cover 40% of the event expenses and receive 40% of the profits or losses. Despite fulfilling their financial obligations, Respondent failed to provide necessary financial documentation, including receipts and stadium reports, instead providing only a self-composed worksheet.

Additional soccer matches between Peru v. Paraguay, Ecuador v. Honduras, and El Salvador v. Haiti were similarly structured, with a 50% profit-sharing agreement. However, Respondent again failed to provide receipts or stadium reports.

In 2019, Petitioners agreed to purchase PFEM from Respondent for \$300,000 under a Business Sale Agreement (BSA) drafted by Respondent’s son, Mauro Beltramini, a Texas-licensed attorney at the time. The BSA required Respondent to facilitate Petitioners' transition into ownership. However, Respondent failed to introduce Petitioners as owners and continued conducting business as if he still owned PFEM.

The onset of COVID-19 prevented Petitioners from fulfilling payment obligations, leading to disputes regarding the business sale. Petitioners sought to recover bond payments made for a match scheduled for March 2020, which had been canceled due to the pandemic. Litigation ensued for fraud and breach of contract, with discovery revealing discrepancies

between Respondent's self-reported expenses and actual financial records obtained via subpoenas.

At trial, Petitioners presented evidence exposing these discrepancies, including stadium reports, U.S. Soccer Federation reports, and Respondent's bank statements. Despite this, the District Court (DC) permitted testimony from Mauro, who lacked direct knowledge of the business operations, and improperly admitted extrinsic evidence against one of Petitioners' key witnesses.

The jury returned a verdict for Respondent on the breach of contract claim but found in favor of Petitioners on the fraud claim without awarding damages. Petitioners' post-trial motion to address this inconsistency was denied. Petitioners then appealed to the Fifth Circuit, which affirmed the DC's judgment on January 3, 2025.

#### **REASON FOR GRANTING AN EXTENSION OF TIME**

1. Resolving this conflict on the burden of proof is fundamental to appellate adjudication. Prejudicial and harmless error are common issues that pervade appellate review for all types of underlying errors. Such an important issue to the resolution of federal appeals requires thorough consideration for this Court's review.
2. The preparation of an adequate petition for certiorari requires substantial time for review of the lower court record, legal research, and careful drafting. However, the current deadline of April 3, 2025, does not provide sufficient time for counsel to prepare a well-reasoned petition.
3. Undersigned counsel, Yasmin Estrella, Esq., is in the process of securing admission to practice before the Supreme Court of the United States. As part of this process, counsel

diligently is seeking the two required sponsors. Given the prior uncertainty regarding her ability to represent Petitioners before this Court without formal admission, counsel was unable to submit this request sooner, as she could not be certain she would be eligible to proceed. These compelling circumstances warrant the granting of this motion.

4. Additionally, Petitioners have suffered severe financial hardship as a result of this case and were unable to retain counsel who could prepare the petition pro bono. Recognizing the significance of the legal issues presented, undersigned counsel has agreed to undertake this representation pro bono to ensure Petitioners' claims receive meaningful consideration.
5. Counsel is a solo practitioner with existing litigation obligations and deadlines in other courts, which have limited the time available to complete the petition by the current deadline. In light of these obligations and the complexity of the issues involved, a sixty (60) day extension is necessary and appropriate to allow for the preparation of a thorough and well-supported petition for certiorari.
6. The current deadline, April 3, 2025, provides insufficient time for counsel to prepare an adequate petition for this Court. Given the importance of addressing an issue to this Court, the Petition requires review of multiple documents, requires additional time to review the lower court record, conduct legal research, and prepare a well-reasoned petition.
7. Therefore, in light of counsel's current obligations and the important legal issues that will be presented in this case, counsel submits that a sixty (60) day extension is necessary and appropriate to effectively prepare a petition for certiorari on Petitioners' behalf. This

request is made in good faith for the reasons set forth above, and not for the purposes of delay.

No prior application for an extension has been made in this matter. Granting the requested extension will not unduly delay the resolution of this case or prejudice any party.

In the interest of justice and for good cause shown, counsel for Petitioners respectfully requests that this Court extend the current April 3, 2025, deadline to June 2, 2025, in order to file this Petition for Writ of Certiorari.

Respectfully submitted,

A handwritten signature in cursive script, reading "Yasmin Estrella Esq.", written in dark ink.

**YASMIN ESTRELLA, ESQ.**  
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