

DAVID MATHIAS, :
Petitioner
 VS. : **No.** _____

**APPLICATION FOR EXTENSION OF TIME
FOR FILING PETITION FOR WRIT OF CERTIORARI**

3. Pursuant to Rule 13.1, Mr. Mathias' petition for writ of certiorari is due on February 20, 2018.

4. Counsel has been unable to complete the petition given that she is presently occupied preparing the reply brief due to be filed in the Third Circuit Court of Appeals on February 7, 2018, in *United States v. Ruben Pena-Ortiz*, No. 17-2398. Counsel is also reviewing the following cases for briefing before the Third Circuit: *United States v. Cruz Garcia*, No. 17-3475, opening brief and joint appendix due February 12, 2018; and *United States v. Ronald Baer*, No. 17-3472, opening brief and joint appendix due February 23, 2018. Additionally, counsel is reviewing other cases to which she is assigned.

5. Counsel respectfully requests an additional 30 days in which to complete the petition for writ of certiorari.

WHEREFORE, for all the foregoing reasons of good cause, Maria K. Pulzetti, Assistant Federal Defender, on behalf of the Federal Community Defender Office for the Eastern District of Pennsylvania, and on behalf of David Mathias, Petitioner, respectfully requests that this Court grant this motion for a 30-day extension of time for filing of a petition for writ of certiorari.

Respectfully submitted,

/s/ Maria K. Pulzetti
MARIA K. PULZETTI
Assistant Federal Defender
Federal Community Defender Office
for the Eastern District of Pennsylvania
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CERTIFICATE OF SERVICE

I, Maria K. Pulzetti, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that I have electronically filed this *Application for Extension of Time for Filing Petition for Writ of Certiorari* through the Electronic Filing System (EFS) of the Supreme Court of the United States and served copies upon Assistant District Attorney Jennifer O. Andress, by first class U.S. mail to her office located at Three South Penn Square, Philadelphia, PA, 19107.

/s/ Maria K. Pulzetti

MARIA K. PULZETTI

Date: February 6, 2018