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IN THE
SUPREME COURT OF THE UNITED STATES

Jonathan Cisneros,

Petitioner,

v.

United States of America,

Respondent.

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

**APPLICATION FOR EXTENSION OF TIME
TO FILE PETITION FOR WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE TENTH CIRCUIT**

VIRGINIA L. GRADY
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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 Jonathan Cisneros, by undersigned counsel, prays for a 30-day extension of time, to and including June 26, 2026, in which to file a petition for a writ of certiorari. In support of this request, counsel states as follows:

1. On February 26, 2026, the United States Court of Appeals for the Tenth Circuit affirmed Mr. Cisneros's sentence. (Attachment A.)

2. Mr. Cisneros 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 27, 2026. 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. Undersigned counsel has had several competing professional commitments since the decision of the Tenth Circuit was issued in Mr. Cisneros's case. Specifically, counsel filed the opening brief in *United States v. Kiley*, Tenth Cir. No. 25-1364, on March 23, 2026; a motion for a sentence reduction in *United States v. Simpson*, D. Colo. No. 14-cr-002650-PAB, on April 27, 2026; and is filing the opening brief in *United States v. Wheaton*, Tenth Cir. No. 25-1446, today, May 15, 2026.

Additionally, as part of her regularly assigned duties in the office, counsel has been assisting trial attorneys with substantive research and motions work in cases in the District of Colorado. Counsel is also responsible for filing any petition for rehearing in *United States v. McCarthy*, Tenth Cir. No. 25-5026 (currently due on June 3, 2026,

with one extension); and the reply brief in *United State v. Beasley*, Tenth Cir.

No. 25-1282 (currently due on May 29, 2026, with no extensions).

5. Given their own current caseloads, as well as the work undersigned counsel has 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.

* * *

For these reasons, Petitioner Jonathan Cisneros respectfully requests that an order be entered extending the time in which to file a petition for a writ of certiorari to and including June 26, 2026. *See* Sup. Ct. R. 13.5.

Respectfully submitted,

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