

No.

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IN THE  
SUPREME COURT OF THE UNITED STATES

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HEIDI CID

*Petitioner*

v.

UNITED STATES OF AMERICA

*Respondent*

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APPLICATION FOR EXTENSION OF TIME WITHIN WHICH TO FILE A  
PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES  
COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

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TO THE HONORABLE CLARENCE THOMAS, ASSOCIATE  
JUSTICE OF THE SUPREME COURT OF THE UNITED STATES AND  
CIRCUIT JUSTICE FOR THE ELEVENTH CIRCUIT

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Federal Public Defender

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## **INTERESTED PARTIES**

Pursuant to Sup. Ct. R. 14.1(b)(i), Ms. Cid submits that there are no parties to the proceedings other than those named in the caption of the case.

Petitioner Cid was the defendant in the district court and appellant below.

Respondent United States of America was the plaintiff in the district court and appellee below.

**PETITIONER'S APPLICATION FOR EXTENSION OF TIME  
TO FILE PETITION FOR WRIT OF CERTIORARI**

Pursuant to Rule 13.5 of the Rules of the Supreme Court of the United States, Petitioner Heidi Cid respectfully requests that the time to file a Petition for Writ of Certiorari in this case be extended for thirty days, up to and including July 16, 2026.

**Basis for Jurisdiction**

1. Applicant Heidi Cid was convicted after pleading guilty to wire fraud conspiracy in violation of 18 U.S.C. § 1349. (DE 35, 37). The United States District Court for the Southern District of Florida had original jurisdiction over this criminal action pursuant to 18 U.S.C. § 3231. At sentencing, the court ordered her to pay a money judgment of \$6,554,250.00. The district court incorporated the preliminary forfeiture order into the judgment entered against Ms. Cid. (DE 128).

2. Ms. Cid appealed her forfeiture judgment to the United States Court of Appeals for the Eleventh Circuit in accordance with 28 U.S.C. § 1291.

3. On December 18, 2025, the Eleventh Circuit issued a non-published opinion affirming Ms. Cid's conviction. *United States v. Cid*, 24-14081, 2025 WL 3677546 (11th Cir. Dec. 18, 2025).

4. Ms. Cid filed a timely petition for rehearing, which was denied by the Eleventh Circuit on March 18, 2026.

5. This Court's jurisdiction may be invoked by the timely filing of a petition for certiorari within 90 days of March 18, 2026. *See* 28 U.S.C. § 1254(a); Sup. Ct. R. 13.3. Thus, Ms. Cid's petition for certiorari is due on June 16, 2026.

### **Judgment to Be Reviewed**

7. A copy of the judgement to be reviewed, *United States v. Heidi Cid*, 24-14081,2025 WL 3677546, (11th Cir. 2026), is attached hereto as Appendix A. A copy of the Eleventh Circuit's order denying rehearing is attached as Appendix B.

### **Reasons for Granting the Extension**

8. Ms. Cid's petition is currently due on June 16, 2026.

9. The undersigned counsel is respectfully seeking additional time in which to file Ms. Cid's petition for certiorari due to numerous other professional obligations, which have delayed his ability to complete preparation of Ms. Cid's petition.

10. In addition, Ms. Cid's petition involves the Eleventh Circuit's application of two appeal waivers contained in her plea agreement. Currently, this Court is considering a related issue in *United States v. Hunter*, 24-1063. This Court's resolution of *Hunter* likely will impact the advocacy in Ms. Cid's case.

11. For these reasons, the undersigned counsel is respectfully seeking an additional period of 30 days in which to file Ms. Cid's petition for certiorari.

12. No party will be prejudiced by the delay.

13. Wherefore, Ms. Cid respectfully requests that an order be entered extending her time to file a petition for a writ of certiorari by thirty days, to and

including July 16, 2026.

Respectfully submitted,

HECTOR A. DOPICO  
FEDERAL PUBLIC DEFENDER

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June 4, 2026

## **APPENDIX A**

2025 WL 3677546

Only the Westlaw citation is currently available.  
United States Court of Appeals, Eleventh Circuit.

UNITED STATES of America, Plaintiff-Appellee,

v.

Heidi CID, Defendant-Appellant.

No. 24-14081

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Non-Argument Calendar

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Filed: 12/18/2025

Appeal from the United States District Court for the Southern  
District of Florida, D.C. Docket No. 1:23-cr-20421-RNS-1

#### Attorneys and Law Firms

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Moss](#), [Markus/Moss](#), PLLC, Miami, FL, for Defendant-  
Appellant.

Before [Jill Pryor](#), [Newsom](#), and [Grant](#), Circuit Judges.

#### Opinion

PER CURIAM:

\*1 The Government's motion to dismiss this appeal pursuant to the appeal waiver in Appellant's plea agreement is GRANTED. See *United States v. Bushert*, 997 F.2d 1343, 1350–51 (11th Cir. 1993) (sentence appeal waiver will be enforced if it was made knowingly and voluntarily); *United States v. Bascomb*, 451 F.3d 1292, 1297 (11th Cir. 2006) (appeal waiver “cannot be vitiated or altered by comments the court makes during sentencing”); *United States v. Grinard-Henry*, 399 F.3d 1294, 1296 (11th Cir. 2005) (waiver of the right to appeal includes waiver of the right to appeal difficult or debatable legal issues or even blatant error).

#### All Citations

Not Reported in Fed. Rptr., 2025 WL 3677546

## **APPENDIX B**

In the  
United States Court of Appeals  
For the Eleventh Circuit

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No. 24-14081

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UNITED STATES OF AMERICA,

*Plaintiff-Appellee,*

*versus*

HEIDI CID,

*Defendant-Appellant.*

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Appeal from the United States District Court  
for the Southern District of Florida  
D.C. Docket No. 1:23-cr-20421-RNS-1

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ON PETITION FOR REHEARING AND PETITION FOR  
REHEARING EN BANC

Before JILL PRYOR, NEWSOM, and GRANT, Circuit Judges.

PER CURIAM:

The Petition for Rehearing En Banc is DENIED, no judge in regular active service on the Court having requested that the Court be polled on rehearing en banc. FRAP 40. The Petition for Panel Rehearing also is DENIED. FRAP 40.