

No. ___ - _____

IN THE SUPREME COURT OF THE UNITED STATES

Jonathan Omar Irizarry Vega,

Petitioner,

v.

United States of America,

Respondent.

**APPLICATION FOR AN EXTENSION OF TIME
IN WHICH TO FILE A PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEAL FOR THE
FOURTH CIRCUIT**

To the Honorable John G. Roberts, Jr., Chief Justice of the United States and Circuit Justice for the Fourth Circuit:

Under 28 U.S.C. § 2101(c) and Rules 13.5, 22, and 30 of this Court, petitioner Jonathan Omar Irizarry Vega respectfully requests a 60-day extension of time, up to and including Friday, September 18, 2026, in which to file a petition for a writ of certiorari in this Court. The Fourth Circuit entered final judgment against Mr. Vega on April 21, 2026. **Attached, Exhibit 1.** Mr. Vega's time to file a petition for a writ of

certiorari in this Court expires on July 20, 2026. Mr. Vega is filing this application more than 10 days before that date. This Court has jurisdiction under 28 U.S.C. § 1254(1).

Mr. Vega requests this extension for the following reasons:

1. The undersigned counsel sent a copy of the order and judgment in this case to Mr. Vega at his last known address on April 21, 2026 (Robson County Detention Center).

2. Unbeknownst to counsel, Mr. Vega was transferred to another facility (Bladen County Detention Center) on April 23, 2026. Mr. Vega did not receive the order, judgement, or notification of his rights to file a certiorari petition with this Court.

3. Counsel was notified of these facts by Mr. Vega on yesterday as well as the fact that Mr. Vega intends to file a certiorari petition.

4. Under Section 5 of the Fourth Circuit CJA plan, counsel are required to notify defendants of their right to seek review in this Court. Given the mandate that counsel is required to “continue to represent his client after termination of the appeal unless relieve of further responsibility,” attorneys who believe the filing of a petition in this Court

would be frivolous must file a motion to withdraw in the Fourth Circuit and permit the defendant to file a pro se petition in this Court.

5. Mr. Vega has lost 60 days during which he could have been preparing his certiorari petition to this Court due to his unplanned transfer to another detention facility.

6. The undersigned believes it is appropriate to seek restoration of the days lost *prior* to seeking withdrawal as appellate counsel and believes allowing the present application would serve the interest of justice.

This the 19th day of June, 2026.

/s/ Quintin D. Byrd
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