

No. _____

IN THE
Supreme Court of the United States

JAIRO ARNALDO JACOME,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

**APPLICATION FOR EXTENSION OF TIME WITHIN WHICH TO FILE A
PETITION FOR WRIT OF CERTIORARI FROM JUDGMENT OF THE
UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT**

TO THE HONORABLE JOHN G. ROBERTS, JR., CHIEF JUSTICE OF THE
UNITED STATES SUPREME COURT and
CIRCUIT JUSTICE FOR THE FOURTH CIRCUIT

Pursuant to Supreme Court Rules 13.5, 22, and 30.3, Jairo Arnaldo Jacome, Petitioner above named, respectfully requests a sixty (60) day extension of time, up to and including October 31, 2025, within which to file a petition for writ of certiorari from the judgment of the United States Court of Appeals for the Fourth Circuit. Mr. Jacome has not previously sought an extension of time from this Court.

Petitioner is filing this Application at least ten days before the filing deadline, which is September 1, 2025. See S. Ct. R. 13.5. The jurisdiction of this Court will be invoked pursuant to 28 U.S.C. § 1254(1).

In 2022, Mr. Jacome was convicted after a two week trial of various offenses, including conspiracy to conduct and participate in the affairs of the an enterprise through a pattern of racketeering activity (“RICO conspiracy”), a violation of 18 U.S.C. § 1962(d); murder in aid of racketeering, 18 U.S.C. § 1959(a)(1) (“VICAR murder”), and aid and abet, 18 U.S.C. § 2; and conspiracy to interfere with interstate commerce by extortion, a violation of 18 U.S.C. § 1951(a). The district court sentenced Mr. Jacome to life imprisonment.

Mr. Jacome appealed to the Fourth Circuit Court of Appeals. Mr. Jacome claimed various errors, including that the district court had created a fatal variance via a difference between the oral and written jury instructions provided to the jury. The parties had noticed the district court’s error in the oral instructions and changed the 70-page set of written instructions that was provided to the jury during its deliberations. However, the jury was not returned to the courtroom to correct the error in open court.

In a published decision, the Court of Appeals determined that under plain error review, Mr. Jacome was unable to establish a violation of his substantial rights.

A copy of the Court of Appeals' Opinion is attached as Appendix A hereto.

Mr. Jacome wishes to seek a writ of certiorari in this Court. The issue presented by this case is important, nuanced, and recurring. To prepare a petition that adequately presents the issue to this Court for consideration, counsel will need additional time. In addition, counsel is also responsible for meeting deadlines in numerous other cases, including *United States v. Casey*, Fourth Circuit No. 18-4839 (petition for writ of certiorari currently due September 15, 2025); *United States v. Vause*, Fourth Circuit No. 25-4119 (opening brief due September 24, 2025); and *United States v. Grant*, Fourth Circuit No. 25-4278 (opening brief due September 17, 2025).

No party will be prejudiced by the granting of a sixty (60) day extension.

As the time within which to file a petition for writ of certiorari in this case will expire September 1, 2025, unless extended, Mr. Jacome respectfully requests an extension of time in which to file a petition for writ of certiorari up to and including October 31, 2025.

Respectfully submitted,



s/Emily Deck Harrill

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August 15, 2025