

September 25, 2025

Hon. Amy Coney Barrett
Associate Justice
Supreme Court of the United States
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Washington, D.C. 20543

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Re: Motion for Extension of Time to File Petition for Writ of Certiorari in
United States v. Pierre Robinson, S. Ct. No. ____, CA7 23-1498

Dear Justice Barrett:

Under Supreme Court Rule 13.5, we respectfully move for a 60-day extension of the time to file a petition for writ of certiorari in the above-captioned case.

Our client, Pierre Robinson, was convicted of murder in aid of racketeering in the United States District Court for the Northern District of Illinois. *United States v. Robinson*, No. 18-cr-00758. The district court sentenced Mr. Robinson to life imprisonment. On July 9, 2025 the Seventh Circuit affirmed the judgment. *United States v. Robinson*, 143 F.4th 775 (7th Cir. 2025). The Seventh Circuit's opinion is attached to this motion.

Under Rule 13.1, the deadline to file a petition for writ of certiorari is October 7, 2025, 90 days from the Seventh Circuit's opinion affirming the district court's judgment. Under Rules 13.5 and 30.1, if this motion is granted, the deadline would be December 8, 2025. This Court has jurisdiction over Mr. Robinson's appeal under 28 U.S.C. § 1254.

An extension of 60 days is warranted for two reasons. One is that I have had great difficulty communicating with my client about the petition for writ of certiorari; his prison permits legal calls only rarely, and he was experiencing a medical issue during our last call that made conversation challenging. Second, my professional commitments warrant an extension. I am working on two oppositions to class certification: one in *In re Community Health Data Incident Litigation*, No. 49D01-2211-PL-041242 (Ind. Sup. Ct.), due on September 29, 2025; and one in *Brahm v. Hospital Sisters Health Systems*, No. 23-cv-444

(W.D. Wisc.), due on October 2, 2025. I am drafting a petition for rehearing in *United States v. Hecke*, 232-2384 (7th Cir.), which is due on October 7, 2025. And I am preparing for a Third Circuit oral argument in *Santoro v. Tower Health*, No. 24-03173 (3d Cir.), which is on October 21, 2025.

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An extension is necessary to allow me sufficient time to conduct research and draft the petition for writ of certiorari, in addition my other commitments. We contacted counsel for the United States, who informed us that she has no objection to the extension being granted.

Sincerely,

/s/ Michael Rayfield

Michael Rayfield

Attorney for Pierre Robinson

cc: See attached service list

PROOF OF SERVICE

I, Michael Rayfield, hereby certify that three copies of this foregoing Motion for Extension of Time to File Petition for Writ of Certiorari in *United States v. Pierre Robinson* were sent via third-party commercial carrier to the U.S. Supreme Court and one copy was sent via third-party commercial carrier to the below service list.

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/s/ Michael Rayfield
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