

No.

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IN THE  
SUPREME COURT OF THE UNITED STATES

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OSVALDO GONZALEZ

*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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HECTOR A. DOPICO  
Federal Public Defender

SRILEKHA JAYANTHI  
Assistant Federal Public Defender  
150 West Flagler Street, Suite 1700  
Miami, Florida 33130-1555  
Telephone No. (305) 530-7000  
E-Mail: Srilekha\_Jayanthi@fd.org

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## **INTERESTED PARTIES**

There are no parties to the proceeding other than those named in the caption of the case.

Humberto Vazquez Diaz and Angel Gabriel Palanco were Mr. Gonzalez's co-defendants in the district court. All three defendants filed notices of appeal, and the three appeals were consolidated into a single multi-appeal, *United States v. Palanco et. al.*, No. 24-10257 (11th Cir. Apr. 7, 2025).

## **RELATED CASES**

*United States v. Vasquez Diaz*, No. 24-10268 (11th Cir. Apr. 7, 2025)

*United States v. Gonzalez*, No. 24-10312 (11th Cir. Apr. 7, 2025)

**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 Osvaldo Gonzalez 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 November 13, 2025.

**Basis for Jurisdiction**

1. On August 4, 2022, an indictment was returned in the United States District Court for the Southern District of Florida, charging Applicant Osvaldo Gonzalez with one count of conspiracy and one count of possession with intent to distribute cocaine while on board a vessel subject to the jurisdiction of the United States, in violation of 46 U.S.C. §§ 70503(a)(1) and 70506(b) (the “Maritime Drug Law Enforcement Act” or “MDLEA”). DE 3.

2. The district court exercised jurisdiction pursuant to 18 U.S.C. § 3231 because Mr. Gonzalez was charged with offenses against the laws of the United States.

3. Mr. Gonzalez was convicted on both counts after a bench trial, and was sentenced to 77 months’ imprisonment. DE 51, 76.

4. Mr. Gonzalez appealed his conviction to the United States Court of Appeals for the Eleventh Circuit in accordance with 28 U.S.C. § 1291. *See* DE 86.

5. On April 7, 2025, the Eleventh Circuit issued a per curiam opinion affirming Mr. Gonzalez’s conviction.

6. Mr. Gonzalez filed a timely petition for rehearing, which was denied by the Eleventh Circuit on July 14, 2025.

7. This Court's jurisdiction may be invoked by the timely filing of a petition for a writ of certiorari within 90 days of July 14, 2025. *See* 28 U.S.C. § 1254(1); Sup. Ct. R. 13.3 and 30. Mr. Gonzalez's petition is therefore currently due on October 14, 2025.

### **Judgment to Be Reviewed**

8. A copy of the judgement to be reviewed is attached as Appendix A. A copy of the Eleventh Circuit's order denying rehearing is attached as Appendix B.

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

9. This case presents important questions of Federal constitutional law regarding the scope of the Sixth Amendment's Speedy Trial Guarantee as to defendants who are held in custody without bail pending trial.

10. Mr. Gonzalez's petition is currently due on October 14, 2025.

11. The undersigned counsel is respectfully seeking additional time in which to file this petition due to numerous other professional obligations, which have delayed her ability to complete preparation of the petition. Specifically, undersigned is primarily a trial lawyer. In the time since Mr. Gonzalez's petition for rehearing was denied by the court of appeals, separate and aside from her duties relating to the ongoing review and investigation of cases pending trial and relating to negotiations connected to hearings that were ultimately uncontested in district court, undersigned has also prepared for, litigated, and argued in contested hearings in the following

cases: *United States v. Vazquez-Pons*, No. 24-20362-CR-JB (S.D. Fla. Jul. 17, 2025) (sentencing); *United States v. Ramirez-Sanchez*, No. 24-20409-CR-JB (S.D. Fla. Jul. 17, 2025) (sentencing); *United States v. Pace*, No. 03-20102-CR-CMA (S.D. Fla. Jul. 29, 2025) (final revocation); *United States v. Burling*, No. 08-20154-CR-FAM (S.D. Fla. Aug. 19, 2025) (final revocation); *United States v. Roberson*, No. 20-20072-CR-CMA (S.D. Fla. Aug. 20, 2025) (final revocation); *United States v. Douglas*, No. 23-80219-CR-AMC (S.D. Fla. Aug. 25, 2025) (post-trial sentencing); *United States v. Rosario*, No. 24-20327-CR-RKA (S.D. Fla. Aug. 28, 2025) (post-conviction issues); *United States v. Renoird*, 25-20360-CR-DSL (S.D. Fla. Sept. 2, 2025) (pretrial detention) *United States v. Lopez*, No. 25-20191-CR-KMW (S.D. Fla. Sept. 8, 2025) (Fourth and Fifth Amendment suppression); *United States v. Bentley*, No. 22-20218-CR-KMW (S.D. Fla. Sept. 9, 2025) (final revocation); *United States v. Herron*, 03-20678-CR-CMA (S.D. Fla. Sept. 10, 2025) (final revocation); *United States v. Stokeling*, 21-20278-CR-KMW (S.D. Fla. Sept. 11, 2025) (final revocation); *United States v. Garrido-Rodriguez*, 25-20033-CR-CMA (S.D. Fla. Sept. 26, 2025) (sentencing); *United States v. Olea Perez*, 23-20083-TP-JEM (final revocation). Undersigned is also currently preparing for trial in *United States v. Delancy*, 24-20518-CR-JB (S.D. Fla.), which is scheduled to begin on November 3, 2025, and in which pretrial motions are due to be filed by next week.

12. Undersigned respectfully submits that, in light of her caseload and upcoming trial schedule, the requested 30-day extension of time to file Mr. Gonzalez's

petition for a writ of certiorari will ensure that she is able to devote adequate time and attention to the filing and important issues raised therein.

13. Wherefore, Mr. Gonzalez respectfully requests that an order be entered extending his time to file a petition for a writ of certiorari by thirty days, to and including November 13, 2025.

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Respectfully submitted,

HECTOR A. DOPICO  
FEDERAL PUBLIC DEFENDER

/s/ Srilekha Jayanthi  
Assistant Federal Public Defender  
Special Bar No. A5502728  
150 West Flagler Street, Suite 1700  
Miami, Florida 33130-1555  
Telephone No. (305) 530-7000  
E-Mail: Srilekha\_Jayanthi@fd.org

Miami, FL  
October 3, 2025