

No. _____

In the
Supreme Court of the United States

Jose M. Rojas-Tapia,

Petitioner,

v.

United States of America,

Respondent.

On Petition for Writ of Certiorari
to the United States Court of Appeals
for the First Circuit

Motion for Extension of Time to File a Petition for Writ of Certiorari

Rachel Brill
Federal Public Defender, District of Puerto Rico

Franco L. Pérez-Redondo
Kevin E. Lerman
Counsel of Record
Robert Fitzgerald
Assistant Federal Public Defenders

241 F.D. Roosevelt Ave.
San Juan, PR 00918
(787) 281-4992

Counsel for Petitioner

Petitioner Jose M. Rojas-Tapia respectfully requests a sixty-day extension of time to file a petition for writ of certiorari from the United States Court of Appeals for the First Circuit's opinion in *Rojas-Tapia v. United States*, 130 F.4th 241 (1st Cir. 2025), *pet. reh'g denied* July 9, 2025. The undersigned has been working diligently to research and prepare a certiorari petition, but preparation is still underway. Given the nature of the issues on appeal, and counsel's other responsibilities, undersigned counsel submits good cause supports extending the deadline for filing a petition for writ of certiorari by sixty (60) days.

Dated this 6th day of October, 2025.

Respectfully submitted,

Rachel Brill
Federal Public Defender

/s/ Kevin E. Lerman
Kevin E. Lerman
Counsel of Record
Assistant Federal Public Defender