

October 24, 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. Steven J. Hecke, S. Ct. No. ____, CA7 23-2384

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, Steven J. Hecke, was convicted of drug-trafficking and firearms charges in the United States District Court for the Northern District of Indiana. *United States v. Hecke*, No. 20-cr-00007. The district court sentenced Mr. Hecke to life imprisonment plus twenty-five years. On August 6, 2025, the Seventh Circuit affirmed the judgment. *United States v. Hecke*, No. 23-2384. 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 November 4, 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 January 4, 2026. This Court has jurisdiction over Mr. Hecke's appeal under 28 U.S.C. § 1254.

My professional commitments warrant an extension of 60 days. Up until recently, I was preparing for a Third Circuit oral argument in *Santoro v. Tower Health*, No. 24-3173 (3d Cir.), which was on October 21, 2025. I am drafting a set of summary judgment motions in *Rodrigues v. Philip Morris USA Inc.*, No. 2384-cv-01680 (Mass Supp. Ct.), which are due on October 31, 2025. I am drafting a summary judgment motion in another case, *Brahm v. Hospital Sisters Health Systems*, No. 23-cv-444 (W.D. Wis.), to be filed next week. And I am

preparing for a hearing in a death penalty case, *Sockwell v. Hamm*, No. 13-cv-00913 (M.D. Ala.), on November 5, 2025.

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 he has no objection to the extension being granted.

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Sincerely,

/s/ Michael Rayfield

Michael Rayfield

Attorney for Steven Hecke

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 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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