

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

CRISTIAN CHAVERRA MORENO,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

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

APPLICATION FOR EXTENSION OF TIME TO FILE A
PETITION FOR WRIT OF CERTIORARI

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**APPLICATION FOR EXTENSION OF TIME TO FILE A
PETITION FOR A WRIT OF CERTIORARI**

To the Honorable Clarence Thomas, Circuit Justice for the United States Court of Appeals for the Eleventh Circuit:

Pursuant to Rule 13.5 of the Rules of the Supreme Court of the United States, Petitioner Cristian Chaverra Moreno¹ respectfully requests that this Honorable Court grant a 30-day extension of time, up to and including Friday, January 23, 2026, to file his Petition for a Writ of Certiorari. *See* Sup. Ct. R. 30.1.

BASIS FOR JURISDICTION

Mr. Chaverra Moreno's appeal and petition involves a challenge to the district court's jurisdiction over his case. However, the United States District Court for the Middle District of Florida exercised jurisdiction over his case under 18 U.S.C. § 3231. The United States Court of Appeals for the Eleventh Circuit reviewed that judgment under 28 U.S.C. § 1291. The Eleventh Circuit issued its decision on September 25, 2025. Appendix A.

This Court's jurisdiction may be invoked by the timely filing of a petition for certiorari within 90 days of September 25, 2025. 28 U.S.C. § 1254(1); Sup. Ct. R. 13.3. Under Supreme Court Rules 13.1, 13.3, and 30.1, Mr. Chaverra Moreno's petition for a writ of certiorari is currently due December 24, 2025. He files this Application more than ten days in advance pursuant to Supreme Court Rules 13.5 and 30.2.

¹ Mr. Chaverra Moreno's name was misspelled on the district court docket and in other documents as "Chevarra Moreno," counsel has confirmed that his name is spelled as "Chaverra Moreno" and will use that spelling throughout his filings.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

On September 25, 2025, the Eleventh Circuit affirmed Mr. Chaverra Moreno's conviction. See *United States v. Chevarra Moreno*, No. 23-11693, 2025 WL 2732118 (11th Cir. Sept. 25, 2025). A copy of the opinion is attached as Appendix A. No petition for rehearing was filed.

REASONS FOR GRANTING AN EXTENSION OF TIME

Mr. Chaverra Moreno is represented by the Federal Defender's Office for the Middle District of Florida. The district is large, active, and busy. The Appellate Division handles direct appeals, collateral challenges to state and federal judgments, and other post-conviction motions filed under 18 U.S.C. § 3582.

In addition to representing Mr. Chaverra Moreno, the undersigned counsel has 31 other clients with pending cases in the court of appeals and district court. Since the Eleventh Circuit's circuit opinion issued, undersigned counsel has needed to spend significant time on those cases, including drafting and filing appellate briefs, jurisdictional responses, and rehearing petitions. In addition, counsel has upcoming deadlines in other cases. Also, the undersigned is responsible for helping prepare colleagues for oral argument and providing trial support when called upon.

A 30-day extension of time would allow the undersigned counsel to effectively prepare Mr. Chaverra Moreno's petition for certiorari while contributing to her other clients' pending matters and attending to her other duties within the Federal Defender's Office. Mr. Chaverra Moreno and the undersigned counsel respectfully submit that the facts herein support a finding of good cause under S. Ct. R. 13.5 for

a 30-day extension of time, up to and including January 23, 2026, to file his petition for certiorari.

CONCLUSION

Wherefore, undersigned counsel respectfully asks this Honorable Court to grant a 30-day extension of time, up to and including January 23, 2026, in which to file a petition for a writ of certiorari.

Respectfully submitted,

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Dated: November 4, 2025