

No. ____-____

IN THE
Supreme Court of the United States

JESSE FERNANDO PEREZ,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

**Application to the Hon. John G. Roberts, Jr.
for an Extension of Time to File a
Petition for a Writ of Certiorari to the
United States Court of Appeals for the Fourth Circuit**

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Counsel for Applicant

APPLICATION FOR EXTENSION OF TIME

Pursuant to Supreme Court Rules 13.3, 13.5, 22, 30, and 33.2, Applicant requests a 60-day extension of time, to and including February 20, 2026, to file a Petition for a Writ of Certiorari. Unless an extension is granted, the deadline for filing the Petition for a Writ of Certiorari will be December 22, 2025. This application is being filed more than 10 days before that date. The jurisdiction of this Court would be invoked under 28 U.S.C. § 1254(1). Copies of the Fourth Circuit's opinion and the order denying rehearing are attached as the Appendix (App. 1a-7a).

In support of this application counsel for Applicant states:

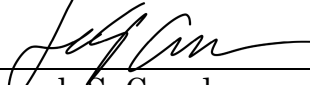
1. Fourth Circuit issued its decision in Applicant's case on August 12, 2025. *United States v. Perez*, 150 F.4th 237, No. 23-4627 (4th Cir. 2025), ECF No. 58. Applicant filed a timely petition for panel rehearing on September 9, 2025. ECF No. 62. The petition for rehearing was denied on September 23, 2025. ECF No. 64. The deadline for a Petition for Writ of Certiorari is therefore December 22, 2025. Sup. Ct. Rules 13.1, 13.3.
2. The majority opinion by Judge Quattlebaum was accompanied by a concurrence by Judge Wynn and a dissent by Judge Harris. All three recognized a split of authority on the question presented – whether a Court may take judicial notice, as a legislative fact, that a particular location falls within the special territorial jurisdiction of the United States under 18 U.S.C. § 7. There is before the Court a pending petition from the Sixth Circuit presenting substantially the same question. *See Silvers v. United States*, No.

25-222. A response was requested from the government, and filed on December 5, 2025.

3. Given the acknowledged split, published opinion, persuasive dissent, and the pendency of a parallel petition, the undersigned has reached out to, and is in discussions with, outside counsel with extensive experience practicing before the Court, and it appears likely that outside counsel may be able to join or assume the representation of Mr. Perez, which would be in Applicant's best interests. Given the possibility of obtaining experienced outside counsel, the complexity of the issues involved and nearly sixty pages of opinions in this case, counsel for Mr. Perez requests an extension of 60 days to February 20, 2026 in which to file his petition for certiorari.

Respectfully submitted,

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December 12, 2025