

No. _____

In the

SUPREME COURT OF THE UNITED STATES

LUIS BLONDET

Petitioner

v.

UNITED STATES OF AMERICA,

Respondent

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

TO: The Honorable Elena Kagan, Associate Justice of the Supreme
Court of the United States and Circuit Justice for the United
States Court of Appeals for the Ninth Circuit

Pursuant to Supreme Court Rule 13.5 and Title 28 U.S.C. §
2101(c) petitioner respectfully request an extension of 60 days to file a
petition for writ of certiorari to the United States Court of Appeals for
the Second Circuit in *United States of America v. Blondet et al.*, Nos.

23-6119(L), 23-6133(CON) (2d Cir. 2026).

This application is unopposed by respondent. (Email communication with Assistant United States Attorney Peter J. Davis, attached as Exhibit A.)

Oral argument occurred May 22, 2026. The United States Court of Appeals for the Second Circuit issued a Summary Order July 2, 2026, affirming the District Court’s judgment. A copy of that Summary Order is attached as Exhibit B. The Second Circuit issued its Mandate August 25, 2026. A copy of that Mandate is attached as Exhibit C.

This Court has jurisdiction to review the Second Circuit’s judgment pursuant to Title 28 U.S.C. § 1255. A petition for writ of certiorari is due by September 30, 2026. Rule 13.5 of the Rules of the Supreme Court of the United States instructs that “an application [for extension] must be filed with the Clerk at least 10 days before the petition is due, except in extraordinary circumstances.” Rules of the Supreme Court, Rule 13.5.

Grounds for the Extension Request

As grounds for this request, petitioner states as follows:

1. This case involves discrete, important, and novel Fifth and

Sixth Amendment legal issues regarding the elements of the Racketeer Influenced and Corrupt Organizations Act (“RICO”), how those elements must be described in an Indictment, and how they must be proved at trial to sustain a conviction.

Good Cause Exists for the Extension Request

Good cause exists for the requested and unopposed 60-day extension for filing the petition.

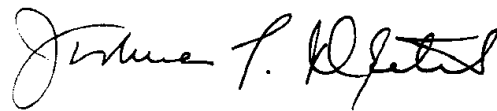
1. As stated **ante**, this appeal raises important constitutional questions of first impression. Additional time is required to properly brief the issues for the Court.
2. Mr. Blondet is currently confined at Federal Correctional Institution (“FCI”) Terre Haute, but is scheduled to be moved this month to another FCI. That transfer process will likely make it exceedingly difficult for counsel to engage in substantive communications with Mr. Blondet until the move is completed approximately two to three weeks after it commences.

3. Mr. Blondet has always been closely involved in the litigation of his case, including strategic considerations and the content of briefing. However, because Mr. Blondet does not speak English, counsel has regularly translated materials into Spanish for his review. Of course, the petition for a writ of *certiorari* represents a critical juncture in the case for Mr. Blondet, and his interest in the contents of the petition is both reasonable and productive.
4. As a result, the draft of the Petition for Writ of Certiorari must be translated into Spanish, in full, and mailed to Mr. Blondet (either at FCI Terre Haute or a subsequent place of confinement).
5. It is anticipated that the process of translation and mailing – and discussion with Mr. Blondet – will take approximately three to four weeks. Mr. Blondet’s indigent status also requires pre-approval from the Second Circuit (pursuant to the Criminal Justice Act) with respect to the translation, a process that also adds to the projected time frame. Indeed, the process of obtaining the Spanish translation of the

Second Circuit's 25-page Summary Order, providing it to Mr. Blondet, and arranging a legal telephone call with him (after affording him sufficient time to review the Summary Order), was not completed until mid-August.

For these reasons, an extension of sixty (60) days to file a Petition for Writ of Certiorari is respectfully requested.

Dated: 14 September 2026
New York, New York

A handwritten signature in black ink, appearing to read "Joshua L. Dratel". The signature is fluid and cursive, with the first name "Joshua" being more prominent and the last name "Dratel" written in a more compact, stylized manner.

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