

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

vs.

CRIMINAL NO. 19-617 (FAB)

JOEJAM RODRIGUEZ RENTA,
Defendant.

AMENDED MOTION TO EXTEND TIME
FOR FILING NOTICE OF APPEAL

TO THE HONORABLE FRANCISCO A. BESOSA
UNITED STATES DISTRICT JUDGE
FOR THE DISTRICT OF PUERTO RICO:

NOW COMES Defendant, JoeJam Rodriguez-Renta, represented by Joseph A. Niskar from the Federal Public Defender's Office, District of Puerto Rico, and in support of the instant motion states as follows:

1. On March 12, 2020, Defendant Rodriguez-Renta was sentenced before this Honorable Court and a Judgment of Conviction was entered later the same day. The time for filing a Notice of Appeal, pursuant to Federal Rule of Appellate Procedure 4(b), expires on March 26, 2020
2. Given the State of Emergency here in Puerto Rico surrounding the COVID-19 pandemic, counsel respectfully requests an extension of time for filing any Notice of Appeal.
3. Pursuant to FRAP 4(b)(4), this Court has the authority to extend the time for filing a Notice of Appeal by up to 30 days following the original filing deadline. By counsel's calculations, this would take us to April 24, 2020.

4. It may very well not require the entire 30-day extension of time for a determination to be made by Mr. Rodriguez-Renta. However, it seems to make more sense to extend the current deadline rather than filing a pro forma Notice of Appeal only to later withdraw the pleading.
5. The uncertainty of knowing when (or where) counsel will be able to meet with his client in the coming weeks also militates in favor of granting an extension of time for filing any Notice of Appeal. Mr. Rodriguez-Renta may be moved by the Marshals to his designated facility, through a transportation hub, and this would cause further delay in counsel conferring with his client.

WHEREFORE, Defendant respectfully requests this Honorable Court to take notice of the present motion and **extend the deadline for any Notice Appeal until April 24, 2020** in order for the Defendant to meet with counsel, for counsel to provide effective representation and allow Mr. Rodriguez-Renta to make a meaningful decision on how to proceed.

I HEREBY CERTIFY that on this date I electronically filed the present notice with the Clerk of Court using the CM/ECF system which will send notification of such filing to the parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of March 2020.

ERIC ALEXANDER VOS
Chief Defender

/s/ Joseph A. Niskar
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