

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

Andres Fernando Cabezas,

Petitioner,

vs.

United States of America,

Respondent.

On Petition for a Writ of Certiorari to
United States Court of Appeals
For the Eleventh Circuit
No. 22-10693

MOTION FOR EXTENSION OF TIME

Andres Fernando Cabezas respectfully requests that this Court grant him an extension of time of 60 days to file his petition for a writ of certiorari. Cabezas is proceeding as an indigent pro se prisoner, ignorant in the law and with highly limited resources. His arguments for his petition are much more sophisticated than he, being based on concepts of digital cryptocurrency property rights, criminal forfeiture, and what constitutes sufficient notice as to what can be returned as part of a Federal Rule of Criminal Procedure 41(g) motion. He thus requires this additional time in order to develop a well-reasoned and researched argument in addition to actually finalizing the necessary documentation.

As a prisoner, Cabezas is at the mercy of the prison's schedule and their resources, which can vary depending on the circumstances of the day. The education department and law library are frequently closed because of this


chaos, as are access to the copiers, printers, or typewriters, particularly during the holiday season. Cabezas further has no access to word processing software or the internet, and is forbidden access by the prison to their electronic communication system (TRULINCS). He instead must subsist on 510 minutes of phone time per month or U.S. mail. He is at a severe disadvantage.

Indeed, much of the information Cabezas needs is not available to him at the prison. As mentioned above, Cabezas's argument is related to digital property generally and cryptocurrency specifically. These topics are still hotly debated among the circuits but much more frequently in academic and policy-centric resources, the latter which is not directly available through prison. Interlibrary loan or books outside of the mostly Clive Cussler novels do not exist at FCC Coleman Low. As such, Cabezas will have to send out (to his family) technical questions regarding his complex certiorari subjects.

Cabezas will, in short, have to rely on the prison mailing system to receive the technical and specific information he needs for his certiorari. The uncertainty of the prison's mail (letters may be inexplicably delayed by up to a month at a time) alone justify Cabezas's need for an additional 60 days. But this is much more apparent in the context of the total instability of the prison he is filing from.

Cabezas therefore requests the additional 60 days to prepare his petition. The government should not be prejudiced by this delay, as Cabezas is incarcerated and the government still holds his property.

Respectfully submitted by Andres Fernando Cabezas on November 18, 2024.



Andres Fernando Cabezas
Reg. No. 68854-018, Unit A-1
Federal Correctional Complex
P.O. Box 1031 (Low Custody)
Coleman, FL 33521-1031