

**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES)	No. ACM S32822
Appellee)	
)	
v.)	
)	ORDER
Raysa GILL)	
Airman First Class (E-3))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 2

On 30 July 2025, counsel for Appellant submitted a Motion for Enlargement of Time (First), requesting an additional 60 days in which to file Appellant’s assignments of error. The Government opposes the motion.

The court has considered Appellant’s motion, the Government’s opposition, case law, and this court’s Rules of Practice and Procedure.

Accordingly, it is by the court on this 31st day of July, 2025,

ORDERED:

Appellant’s Motion for Enlargement of Time (First) is **GRANTED**. Appellant shall file any assignments of error not later than **8 October 2025**.

Appellant’s counsel is advised that any subsequent motions for enlargement of time shall include, in addition to matters required under this court’s Rules of Practice and Procedure, statements as to: (1) whether Appellant was advised of Appellant’s right to a timely appeal, (2) whether Appellant was provided an update of the status of counsel’s progress on Appellant’s case, (3) whether Appellant was advised of the request for an enlargement of time, and (4) whether Appellant agrees with the request for an enlargement of time.



FOR THE COURT



AGNIESZKA M. GAERTNER, Capt, USAF
Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES) **APPELLANT’S MOTION FOR**
) **ENLARGEMENT OF TIME (FIRST)**
)
)
) Before Panel No. 2
)
)
) No. ACM S32822
)
)
) 30 July 2025
)
)

Appellee,

v.

Airman First Class (E-3)
RAYSA GILL,
United States Air Force
Appellant

**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES
AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(1) and (2) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error. Appellant requests an enlargement for a period of 60 days, which will end on **8 October 2025**. The record of trial was docketed with this Court on 10 June 2025. From the date of docketing to the present date, 50 days have elapsed. On the date requested, 120 days will have elapsed.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,

[Redacted Signature]

JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel

[Redacted Address]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 30 July 2025.

[REDACTED]

JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
)	Before Panel No. 2
Airman First Class (E-3))	
RAYSA GILL)	No. ACM S32822
United States Air Force,)	
<i>Appellant.</i>)	
)	30 July 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignments of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

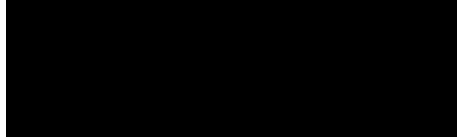
[Redacted Signature]

VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[Redacted Address]

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 30 July 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES <i>Appellee</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
)	(SECOND)
v.)	
)	Before Panel No. 2
Airman First Class (E-3))	
RAYSA GILL)	No. ACM S32822
United States Air Force)	
<i>Appellant</i>)	26 September 2025

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(1), (3)-(4) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **7 November 2025**. The record of trial was docketed with this Court on 10 June 2025. From the date of docketing to the present date, 108 days have elapsed. On the date requested, 150 days will have elapsed.

On 13 through 14 January 2025, Appellant was tried by a special court-martial composed of a military judge alone at Grand Forks Air Force Base, North Dakota. Trial Tr. at 1, 9-10; App. Ex. I. Appellant was found guilty, contrary to her pleas, of one charge and one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 885, and one charge and one specification of disobeying a superior commissioned officer in violation of Article 90, UCMJ, 10 U.S.C. § 890. Trial Tr. at 6, 221; Electronic Record of Trial (eROT) Vol 1, *Entry of Judgment* (Feb. 2, 2025).

The military judge sentenced Appellant to a reprimand, reduction in pay grade to E-1, confinement for fifty-nine days (served concurrently), and a bad conduct discharge. Trial Tr. at

256; eROT Vol 1, *Entry of Judgment* (Feb. 2, 2025). The convening authority took no action on the findings or sentence. eROT Vol 1, *Convening Authority Decision on Action* (Jan. 24, 2025).

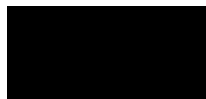
The trial transcript is 256 pages long. The electronic record of trial contains five Prosecution Exhibits, nineteen Defense Exhibits, and thirteen Appellate Exhibits. Appellant is not currently confined.

Appellant was advised of her right to a timely appeal. Appellant has been provided an update of the status of counsel's progress on her case. Appellant was advised of the request for this enlargement of time. Appellant has provided limited consent to disclose a confidential communication with counsel wherein he consented to the request for this enlargement of time.

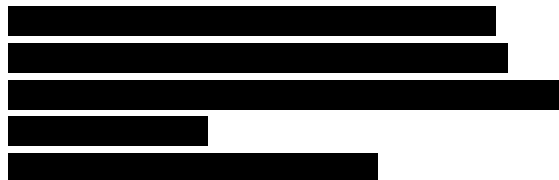
Through no fault of Appellant, undersigned counsel has been unable to complete their review of Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise him regarding potential errors.

WHEREFORE, Appellant requests that this Court grant the requested enlargement of time for good cause shown.

Respectfully submitted,



JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 26 September 2025.

[REDACTED]

JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman First Class (E-3))	Before Panel No. 2
RAYSA GILL)	No. ACM S32822
United States Air Force,)	
<i>Appellant.</i>)	29 September 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignments of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

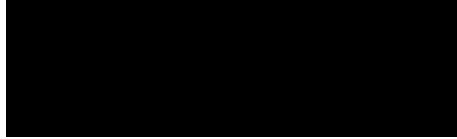
[Redacted Signature]

VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[Redacted Address]

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 29 September 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES <i>Appellee</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
)	(THIRD)
v.)	
)	Before Panel No. 2
Airman First Class (E-3))	
RAYSA GILL)	No. ACM S32822
United States Air Force)	
<i>Appellant</i>)	28 October 2025

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(1), (3)-(4) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **7 December 2025**. The record of trial was docketed with this Court on 10 June 2025. From the date of docketing to the present date, 140 days have elapsed. On the date requested, 180 days will have elapsed.

On 13 through 14 January 2025, Appellant was tried by a special court-martial composed of a military judge alone at Grand Forks Air Force Base, North Dakota. Trial Tr. at 1, 9-10; App. Ex. I. Appellant was found guilty, contrary to her pleas, of one charge and one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 885, and one charge and one specification of disobeying a superior commissioned officer in violation of Article 90, UCMJ, 10 U.S.C. § 890. Trial Tr. at 6, 221; Electronic Record of Trial (eROT) Vol 1, *Entry of Judgment* (Feb. 2, 2025).

The military judge sentenced Appellant to a reprimand, reduction in pay grade to E-1, confinement for fifty-nine days (served concurrently), and a bad conduct discharge. Trial Tr. at

256; eROT Vol 1, *Entry of Judgment* (Feb. 2, 2025). The convening authority took no action on the findings or sentence. eROT Vol 1, *Convening Authority Decision on Action* (Jan. 24, 2025).

The trial transcript is 256 pages long. The electronic record of trial contains five Prosecution Exhibits, nineteen Defense Exhibits, and thirteen Appellate Exhibits. Appellant is not currently confined.

Appellant was advised of her right to a timely appeal. Appellant has been provided an update of the status of counsel's progress on her case. Appellant was advised of the request for this enlargement of time. Appellant has provided limited consent to disclose a confidential communication with counsel wherein he consented to the request for this enlargement of time.

Through no fault of Appellant, undersigned counsel has been unable to complete their review of Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise him regarding potential errors.

WHEREFORE, Appellant requests that this Court grant the requested enlargement of time for good cause shown.

Respectfully submitted,

[Redacted signature]

JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel

[Redacted address lines]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 28 October 2025.

[REDACTED]

JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
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[REDACTED]

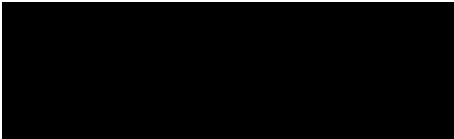

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman First Class (E-3))	Before Panel No. 2
RAYSA GILL,)	No. ACM S32822
United States Air Force,)	
<i>Appellant.</i>)	30 October 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

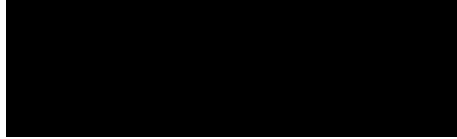
Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.


VANESSA BAIROS, Maj, USAF
Appellate Government Counsel


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 30 October 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES)	No. ACM S32822
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Raysa GILL)	
Airman First Class (E-3))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 2

On 26 November 2025, counsel for Appellant submitted a Motion for Enlargement of Time (Fourth) requesting an additional 30 days to submit Appellant’s assignments of error. The Government opposes the motion.

The court has considered Appellant’s motion, the Government’s opposition, case law, and this court’s Rules of Practice and Procedure.

Accordingly, it is by the court on this 4th day of December, 2025,

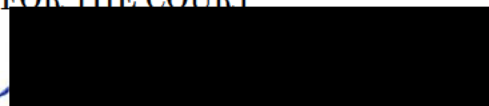
ORDERED:

Appellant’s Motion for Enlargement of Time (Fourth) is **GRANTED**. Appellant shall file any assignments of error not later than **6 January 2026**.

Appellant’s counsel is advised that any further requests for an enlargement of time may necessitate a status conference to determine the progress being made on Appellant’s case per this court’s Rule 23.3(m)(6). A.F. CT. CRIM. APP. R. 23.3(m)(6).



FOR THE COURT



JACOB B. HOEFERKAMP, Capt, USAF
Chief Commissioner

256; eROT Vol 1, *Entry of Judgment* (Feb. 2, 2025). The convening authority took no action on the findings or sentence. eROT Vol 1, *Convening Authority Decision on Action* (Jan. 24, 2025).

The trial transcript is 256 pages long. The electronic record of trial contains five Prosecution Exhibits, nineteen Defense Exhibits, and thirteen Appellate Exhibits. Appellant is not currently confined.

Appellant was advised of his right to a timely appeal. Appellant has been provided an update of the status of counsel's progress on his case. Appellant was advised of the request for this enlargement of time. Appellant has provided limited consent to disclose a confidential communication with counsel wherein he consented to the request for this enlargement of time.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information. Undersigned counsel is currently assigned forty-one cases; twenty-six cases are pending before this Court (twenty-three cases are pending AOE's) and fourteen cases pending before the United States Supreme Court (for petition for writ of certiorari). To date, undersigned counsel has fifteen cases prioritized over the present case:

1. *United States v. Rafajko*, ACM 40821 – The record of trial is one electronic volume consisting of six prosecution exhibits, ten defense exhibits, and fifty-two appellate exhibits; the transcript is 303 pages. Undersigned counsel is presently conducting a review of the record of trial.

2. *United States v. Montgomery*, ACM 40824 – The record of trial is four volumes consisting of six prosecution exhibits, three defense exhibits, and nine appellate exhibits; the transcript is 246 pages. Undersigned counsel has not yet completed review of the record of trial.

3. *United States v. Lara*, USCA Dkt. No. 25-0163/AF – The appellant's petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant's petition, and it is currently awaiting printing.

4. *United States v. Cadavona*, USCA Dkt. No. 25-0114/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

5. *United States v. Denney*, USCA Dkt. No. 24-0111/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

6. *United States v. Gubicza*, USCA Dkt. No. 24-0219/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

7. *United States v. Hollenback*, USCA Dkt. No. 24-0235/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

8. *United States v. Jackson*, USCA Dkt. No. 24-0106/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

9. *United States v. Lampkins*, USCA Dkt. No. 24-0069/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

10. *United States v. Maymi*, USCA Dkt. No. 24-0049/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

11. *United States v. Schneider*, USCA Dkt. No. 24-0228/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

12. *United States v. Van Velson*, USCA Dkt. No. 24-0225/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

13. *United States v. Wood*, USCA Dkt. No. 25-0005/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

14. *United States v. York*, USCA Dkt. No. 25-0200/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

15. *United States v. Mitton*, USCA Dkt. No. 25-0223/AF – The appellant’s petition for a writ of certiorari to the Supreme Court is due on 15 December 2025. Counsel has completed appellant’s petition, and it is currently awaiting printing.

Through no fault of Appellant, undersigned counsel has been unable to complete their review of Appellant’s case. An enlargement of time is necessary to allow counsel to fully review Appellant’s case and advise him regarding potential errors.

WHEREFORE, Appellant requests that this Court grant the requested enlargement of time for good cause shown.

Respectfully submitted,



JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 26 November 2025.

[REDACTED]

JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT'S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 2
Airman First Class (E-3))	
RAYSA GILL,)	No. ACM S32822
United States Air Force.)	
<i>Appellant</i>)	2 December 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

[REDACTED]

VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[REDACTED]

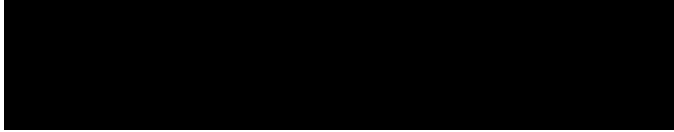
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[REDACTED]

[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 2 December 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	APPELLANT'S MOTION FOR
<i>Appellee</i>)	ENLARGEMENT OF TIME
)	(FIFTH)
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
RAYSA GILL)	No. ACM S32822
United States Air Force)	
<i>Appellant</i>)	22 December 2025

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **5 February 2026**. The record of trial was docketed with this Court on 10 June 2025. From the date of docketing to the present date, 195 days have elapsed. On the date requested, 240 days will have elapsed.

On 13 through 14 January 2025, Appellant was tried by a special court-martial composed of a military judge alone at Grand Forks Air Force Base, North Dakota. Trial Tr. 1, 9-10; App. Ex. I. Appellant was found guilty, contrary to her pleas, of one charge and one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 885, and one charge and one specification of disobeying a superior commissioned officer in violation of Article 90, UCMJ, 10 U.S.C. § 890. Trial Tr. 6, 221; Electronic Record of Trial (eROT) Vol 1, *Entry of Judgment* (Feb. 2, 2025).

The military judge sentenced Appellant to a reprimand, reduction in pay grade to E-1, confinement for fifty-nine days (served concurrently), and a bad conduct discharge. Trial Tr. 256; eROT Vol 1, *Entry of Judgment* (Feb. 2, 2025). The convening authority took no action on the findings or sentence. eROT Vol 1, *Convening Authority Decision on Action* (Jan. 24, 2025).

The trial transcript is 256 pages long. The electronic record of trial contains five Prosecution Exhibits, nineteen Defense Exhibits, and thirteen Appellate Exhibits. Appellant is not currently confined.

Appellant was advised of her right to a timely appeal. Appellant has been provided an update of the status of counsel's progress on her case. Appellant was advised of the request for this enlargement of time. Appellant has provided limited consent to disclose a confidential communication with counsel wherein she consented to the request for this enlargement of time.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information.

Capt Fredericks is currently assigned forty-three cases; twenty-seven cases are pending before this Court (twenty-five cases are pending AOE's), one case pending before the Court of Appeals of the Armed Forces, and fourteen cases pending before the United States Supreme Court (for petition for writ of certiorari). To date, Capt Fredericks has the following cases prioritized over the present case:

1. *United States v. Rafajko*, ACM 40821 – The record of trial is one electronic volume consisting of six prosecution exhibits, ten defense exhibits, and

fifty-two appellate exhibits; the transcript is 303 pages. Undersigned counsel is presently conducting a review of the record of trial.

2. *United States v. Armour*, Misc. Dkt. No. 2025-10 – The record of trial is five volumes consisting of twenty-one appellate exhibits; the transcript is 118 pages. Undersigned counsel has completed a review of the record of trial. The appellant’s petition to the Court of Appeals of the Armed Forces, if any, is due on 3 February 2026.

3. *United States v. Montgomery*, ACM 40824 – The record of trial is four volumes consisting of six prosecution exhibits, three defense exhibits, and nine appellate exhibits; the transcript is 246 pages. Undersigned counsel has not yet completed review of the record of trial.

Maj Rebecca Monroe, an Air Force Individual Mobilization Augmentee Reservist, has been detailed to the above-captioned case as lead counsel. Maj Monroe does not have any cases prioritized over the present case and has Inactive Duty Training (IDT) days scheduled for January to begin review of the record of trial.

Through no fault of Appellant, undersigned counsel has been unable to complete their review of Appellant’s case. An enlargement of time is necessary to allow counsel to fully review Appellant’s case and advise her regarding potential errors.

WHEREFORE, Appellant requests that this Court grant the requested enlargement of time for good cause shown.

[REDACTED]

JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 22 December 2025.

[REDACTED]

JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT'S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
RAYSA GILL,)	No. ACM S32822
United States Air Force.)	
<i>Appellant</i>)	29 December 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

[REDACTED]

VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[REDACTED]

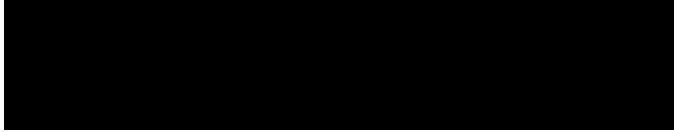
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[REDACTED]

[REDACTED]

CERTIFICATE OF FILING AND SERVICE

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Appellate Defense Division on 29 December 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



The military judge sentenced Appellant to a reprimand, reduction in pay grade to E-1, confinement for fifty-nine days (served concurrently), and a bad conduct discharge. Trial Tr. 256; eROT Vol 1, *Entry of Judgment* (Feb. 2, 2025). The convening authority took no action on the findings or sentence. eROT Vol 1, *Convening Authority Decision on Action* (Jan. 24, 2025).

The trial transcript is 256 pages long. The electronic record of trial contains five Prosecution Exhibits, nineteen Defense Exhibits, and thirteen Appellate Exhibits. Appellant is not currently confined.

Appellant was advised of her right to a timely appeal. Appellant has been provided an update of the status of counsel's progress on her case. Appellant was advised of the request for this enlargement of time. Appellant has provided limited consent to disclose a confidential communication with counsel wherein she consented to the request for this enlargement of time.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information.

Capt Fredericks is currently assigned thirty-nine cases; thirty-seven cases are pending before this Court (thirty-five cases are pending AOE's) and two cases are pending before the Court of Appeals for the Armed Forces. To date, Capt Fredericks has the following cases prioritized over the present case:

1. *United States v. Menard*, No. 25-0173/AF – Undersigned counsel is preparing and providing oral argument before the Court of Appeals of the Armed Forces on 27 January 2026.

2. *United States v. Rafajko*, ACM 40821 – The record of trial is one electronic volume consisting of six prosecution exhibits, ten defense exhibits, and fifty-two appellate exhibits; the transcript is 303 pages. Undersigned counsel is presently conducting a review of the record of trial.

3. *United States v. Armour*, Misc. Dkt. No. 2025-10 – The record of trial is five volumes consisting of twenty-one appellate exhibits; the transcript is 118 pages. Undersigned counsel has completed a review of the record of trial. The appellant’s petition to the Court of Appeals of the Armed Forces, if any, is due on 3 February 2026.

4. *United States v. Lucas*, ACM 40702 – The record of trial is five electronic volumes consisting of eleven prosecution exhibits, three defense exhibits, and sixteen appellate exhibits; the transcript is 187 pages. Undersigned counsel has not yet completed review of the record of trial.

5. *United States v. Lumm*, ACM 40748 – The record of trial is one electronic volume consisting of four prosecution exhibits, fourteen defense exhibits, seven appellate exhibits, and one court exhibit; the transcript is 111 pages. Undersigned counsel has not yet completed review of the record of trial.

6. *United States v. Montgomery*, ACM 40824 – The record of trial is four electronic volumes consisting of six prosecution exhibits, three defense exhibits, and nine appellate exhibits; the transcript is 246 pages. Undersigned counsel has not yet completed review of the record of trial.

Maj Rebecca Monroe, an Air Force Individual Mobilization Augmentee Reservist, has been detailed to the above-captioned case as lead counsel. This is Maj Monroe's top priority case. She has Inactive Duty Training (IDT) days scheduled for February to further her review of the record of trial.

Through no fault of Appellant, undersigned counsel has been unable to complete their review of Appellant's case. Maj Monroe has begun her review of the transcript and exhibits and anticipates furthering her substantially review during her next IDT. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise her regarding potential errors.

WHEREFORE, Appellant requests that this Court grant the requested enlargement of time for good cause shown.

[REDACTED]

JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 26 January 2026.

[REDACTED]

JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT'S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
RAYSA GILL,)	No. ACM S32822
United States Air Force.)	
<i>Appellant</i>)	28 January 2026

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

[REDACTED]

VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[REDACTED]

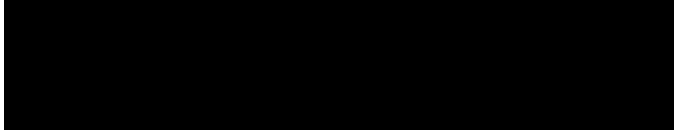
[REDACTED]

[REDACTED]

[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 28 January 2026.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES <i>Appellee</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
)	(SEVENTH)
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
RAYSA GILL)	No. ACM S32822
United States Air Force)	
<i>Appellant</i>)	25 February 2026

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **6 April 2026**. The record of trial was docketed with this Court on 10 June 2025. From the date of docketing to the present date, 260 days have elapsed. On the date requested, 300 days will have elapsed.

On 13 through 14 January 2025, Appellant was tried by a special court-martial composed of a military judge alone at Grand Forks Air Force Base, North Dakota. Trial Tr. 1, 9-10; App. Ex. I. Appellant was found guilty, contrary to her pleas, of one charge and one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 885, and one charge and one specification of disobeying a superior commissioned officer in violation of Article 90, UCMJ, 10 U.S.C. § 890. Trial Tr. 6, 221; Electronic Record of Trial (eROT) Vol 1, *Entry of Judgment* (Feb. 2, 2025).

The military judge sentenced Appellant to a reprimand, reduction in pay grade to E-1, confinement for fifty-nine days (served concurrently), and a bad conduct discharge. Trial Tr. 256;

eROT Vol 1, *Entry of Judgment* (Feb. 2, 2025). The convening authority took no action on the findings or sentence. eROT Vol 1, *Convening Authority Decision on Action* (Jan. 24, 2025).

The trial transcript is 256 pages long. The electronic record of trial contains five Prosecution Exhibits, nineteen Defense Exhibits, and thirteen Appellate Exhibits. Appellant is not currently confined.

Appellant was advised of her right to a timely appeal. Appellant has been provided an update of the status of counsel's progress on her case. Appellant was advised of the request for this enlargement of time. Appellant has provided limited consent to disclose a confidential communication with counsel wherein she consented to the request for this enlargement of time.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information. Undersigned counsel, an Air Force Individual Mobilization Augmentee Reservist, has been detailed to the above-captioned case as lead counsel.¹ This is her only case before the court, and she does not have any cases prioritized over the present case. Counsel has Inactive Duty Training (IDT) days scheduled for February and March to further her review of the record of trial.

Through no fault of Appellant, undersigned counsel has been unable to complete her review of Appellant's case. Counsel continues to make progress in her review of the case file, including progress on reviewing and analyzing the transcript, exhibits, and post-trial documents. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise her regarding potential errors.

¹ Capt John Fredericks remains assigned to this case as of the date of filing. However, his Motion to Withdraw as Counsel was filed simultaneously with this motion. Capt Fredericks has several cases prioritized above this one, whereas Maj Monroe does not, and is TDY to Squadron Officer School until 30 March 2026. His case load and prioritization are omitted for the sake of clarity, as Maj Monroe is lead counsel and her prioritization provides the most accurate depiction of counsel's ability to prioritize this case.

WHEREFORE, Appellant requests that this Court grant the requested enlargement of time for good cause shown.

[REDACTED]

REBECCA J. MONROE, Maj, USAF
Appellate Defense Counsel

[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division (af.jajg.afloa.filing.workflow@us.af.mil) on 25 February 2026.



REBECCA J. MONROE, Maj, USAF
Appellate Defense Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
RAYSA GILL,)	No. ACM S32822
United States Air Force.)	
<i>Appellant</i>)	2 March 2026

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court’s Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant’s Motion for Enlargement of Time to file an Assignment of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant nearly a year to submit an assignment of error to this Court. If Appellant’s new delay request is granted, the defense delay in this case will be 300 days in length. Appellant’s nearly year-long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court’s appellate processing standards. Appellant has already consumed almost two-thirds of the 18-month standard for this Court to issue a decision, which only leaves about 8 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant’s counsel has not completed review of the record of trial at this late stage of the appellate process.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

[REDACTED]

VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[REDACTED]

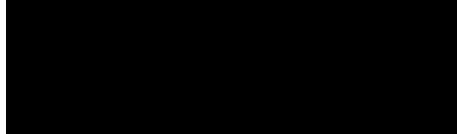
[REDACTED]

[REDACTED]

[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 2 March 2026.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES)	No. ACM S32822
<i>Appellee</i>)	
)	
v.)	
)	NOTICE OF PANEL
Raysa GILL)	CHANGE
Airman First Class (E-3))	
U.S. Air Force)	
<i>Appellant</i>)	

It is by the court on this 15th day of December, 2025,

ORDERED:

That the Record of Trial in the above-styled matter is withdrawn from Panel 2 and referred to Panel 1 for appellate review.

This panel letter supersedes all previous panel assignments.



FOR THE COURT

[Redacted signature]

JACOB B. HOEFERKAMP, Capt, USAF
Chief Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	MOTION FOR WITHDRAWAL
<i>Appellee</i>)	OF APPELLATE DEFENSE
)	COUNSEL
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
RAYSA GILL)	No. ACM S32822
United States Air Force)	
<i>Appellant</i>)	25 February 2026

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rules 12(b), 12.4, and 23.3(h) of this Honorable Court’s Rules of Practice and Procedure, undersigned counsel respectfully requests to withdraw as counsel in the above-captioned case. Undersigned counsel is withdrawing to allow a more available appellate defense counsel to take over Appellant’s case. Maj Rebecca Monroe, an Air Force Individual Mobilization Augmentee Reservist, has been detailed substitute appellate military counsel in undersigned counsel’s stead and made her notice of appearance on 25 February 2026. Counsel have completed a thorough turnover of the record.

Appellant has been advised of this motion to withdraw as counsel and consents to undersigned counsel’s withdrawal. A copy of this motion will be delivered to Appellant following its filing.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant this motion.

Respectfully submitted,

[REDACTED]

JOHN M. FREDERICKS, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 25 February 2026.

REBECCA J. MONROE, Maj, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]