

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

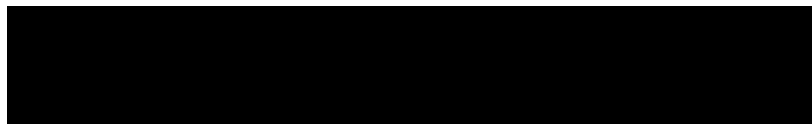
UNITED STATES)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME (FIRST)
)	
v.)	Before Panel 2
)	
Amn (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force)	5 November 2024
)	
<i>Appellant.</i>)	

**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 his first enlargement of time to file an Assignment of Error (AOE). Appellant requests an enlargement for a period of 60 days, which will end on **18 January 2025**. This case was docketed with this Court on 20 September 2024. From the date of docketing to the present date, 46 days have elapsed. On the date requested, 120 days will have elapsed.

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

Respectfully submitted,


TREVOR N. WARD, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 5 November 2024.

Respectfully submitted,



TREVOR N. WARD, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

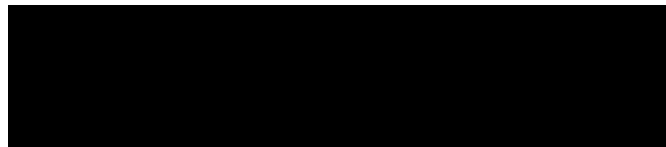
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman (E-2))	ACM 40684
JUAN E. PARRA-PERALTA, USAF,)	
<i>Appellant.</i>)	Panel No.2
)	

**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.



JENNY A. LIABENOW, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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 6 November 2024.



JENNY A. LIABENOW, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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

UNITED STATES)	No. ACM 40684
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Juan E. PARRA-PERALTA)	
Airman (E-2))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 2

On 5 November 2024, counsel for Appellant submitted a Motion for Enlargement of Time (First) requesting an additional 60 days to submit Appellant’s assignments of error. The Government opposes the motion.

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

Accordingly, it is by the court on this 7th day of November, 2024,

ORDERED:

Appellant’s Motion for Enlargement of Time (First) is **GRANTED**. Appellant shall file any assignments of error **not later than 18 January 2025**.

Counsel should not rely on any subsequent requests for enlargement of time being granted. Each request will be considered on its merits.

Appellant’s counsel is advised that any subsequent motions for enlargement of time shall include, in addition to the 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. Counsel is not required to re-address item (1) in each subsequent motion for enlargement of time if counsel previously replied in the affirmative.

Counsel may request, and the court may order *sua sponte*, a status conference to facilitate timely processing of this appeal.

Appellant's counsel is further advised that any future requests for enlargements of time that, if granted, would expire more than 360 days after docketing, will not be granted absent exceptional circumstances.



FOR THE COURT



OLGA STANFORD, Capt, USAF
Commissioner

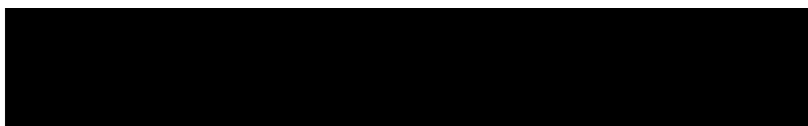
The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Appellant has provided limited consent to disclose confidential communications, wherein:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has not been advised of this specific request for enlargement of time.
- (3) Appellant has not been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has not specifically consented to this enlargement of time.

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

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 8 January 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

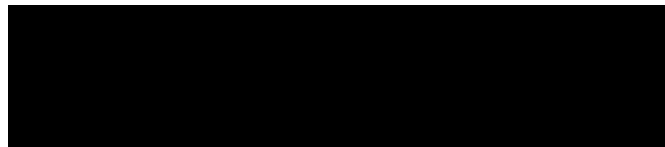
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman (E-2))	ACM 40684
JUAN E. PARRA-PERALTA, USAF,)	
<i>Appellant.</i>)	Panel No.2
)	

**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.



JENNY A. LIABENOW, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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 13 January 2025.



JENNY A. LIABENOW, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

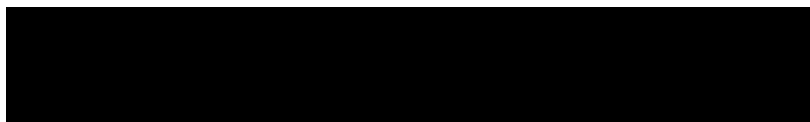
The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has not been advised of this specific request for enlargement of time.
- (3) Appellant has not been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has not specifically consented to this enlargement of time.

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

Respectfully submitted,

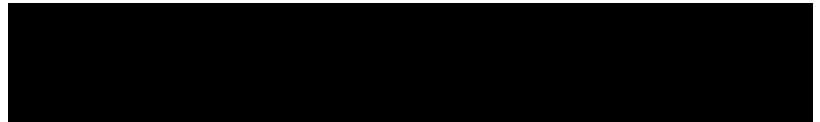


TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 8 January 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

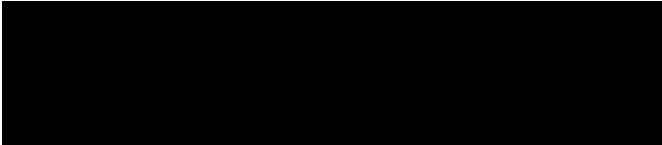
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman (E-2))	ACM 40684
JUAN E. PARRA-PERALTA, USAF,)	
<i>Appellant.</i>)	Panel No.2
)	

**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.



JENNY A. LIABENOW, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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 11 February 2025.



JENNY A. LIABENOW, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME (FOURTH)
)	
v.)	Before Panel 2
)	
Airman (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	11 March 2025
<i>Appellant.</i>)	

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

Pursuant to Rule 23.3(m)(4) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his fourth enlargement of time to file an Assignment of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **18 April 2025**. This case was docketed with this Court on 20 September 2024. From the date of docketing to the present date, 172 days have elapsed. On the date requested, 210 days will have elapsed.

On 20 March 2024 and 25-29 March 2025, R. at 1, 75, 744, Appellant was tried by a general court-martial comprised of officer and enlisted members. R. at 15. Contrary to his pleas, R. at 18, Appellant was found guilty of one charge and two specifications of obstruction of justice, in violation of Article 82, Uniform Code of Military Justice (UCMJ), and one charge and specification of providing false information to law enforcement officers, in violation of Article 121, UCMJ. R. at 672-73. The military judge sentenced Appellant to a reduction to E-1, total a bad-conduct discharge, and confinement for 12 months. R. at 743. The convening took no action with respect to the findings or sentence. Record of Trial (ROT), Vol. 1,



GRANTED by the Honorable Judge [Name] in a Priority Decision on Action. Appellant is confined.

12 MAR 2025

The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Undersigned counsel is assigned 30 cases, 19 cases are pending initial AOE's before this Court. One case before the United States Supreme Court takes priority over this case: *United States v. Kelnhofer*. The petition for writ of certiorari is due in late May 2025. The petition must be prepared no later than 14 May 2025 to complete printing and file on time. Undersigned counsel has not yet begun work on this petition. Two cases before the Court of Appeals for the Armed Forces (CAAF) have priority over this case: (1) *United States v. Couty*; and (2) *United States v. Beyer*. Undersigned counsel has not yet begun work on these petitions.

In addition, the following cases before this Court take priority over the instant case:

- 1) *United States v. Barlow*, ACM 40552 – The record of trial is four volumes, consisting of six prosecution exhibits, nine defense exhibits, 16 appellate exhibits, and two court exhibits; the transcript is 338 pages. Undersigned counsel has completed a review of all unsealed materials. A review of sealed materials will begin next week. A brief, if any, will be filed with this Court no later than 14 March 2025.
- 2) *United States v. Evangelista*, ACM 40531 – The record of trial is 10 volumes, consisting of 56 appellate exhibits, 18 prosecution exhibits, 12 defense exhibits, and one court exhibit; the transcript is 1,439 pages. Undersigned counsel has reviewed approximately 850 pages of this record and filed a motion to review sealed materials, which this Court granted. This appellant recently retained civilian counsel. Civilian counsel are in the process of obtaining the record of trial in this case. Additionally, undersigned and civilian counsel will review sealed materials in this case today, 27 February 2025.

- 3) *United States v. Tyson*, ACM 40612 – The record of trial is an electronic record consisting of 924 pages. There are four prosecution exhibits, four defense exhibits, and 11 appellate exhibits. The transcript is 92 pages. Undersigned counsel has not begun a review of this record.
- 4) *United States v. Augustin*, ACM 40655 – The record of trial is eight volumes consisting of 10 prosecution exhibits, seven defense exhibit, and 24 appellate exhibits, and one court exhibit. The transcript is 1,201 pages long. Undersigned counsel has not begun a review of this record.
- 5) *United States v. Hon*, ACM 40671 – The record of trial is six volumes long consisting of 14 prosecution exhibits, seven defense exhibits, 28 appellate exhibits, and one court exhibit. The transcript is 483 pages long.
- 6) *United States v. Sawyer*, ACM 40670 – The record of trial is five volumes consisting of 10 prosecution exhibits, 16 defense exhibits, and 25 appellate exhibits. The transcript is 245 pages long.

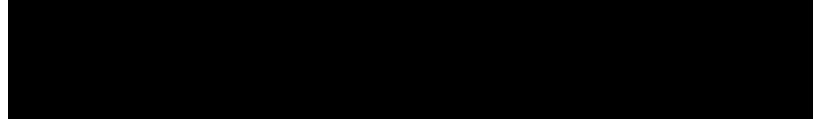
Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors.

Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has not been advised of this specific request for enlargement of time.
- (3) Appellant has not been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has not specifically consented to this enlargement of time.

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

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 11 March 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

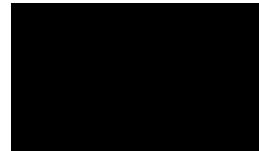
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT'S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 2
Staff Sergeant (E-5))	
JUAN E. PARRA-PERALTA,)	No. ACM 40684
United States Air Force.)	
<i>Appellant</i>)	11 March 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.



KATE E. LEE, Maj, USAF
Appellate Government Counsel
Government Trial & Appellate Operations
1500 W. Perimeter Road, Suite 1190
Joint Base Andrews, MD
DSN: 612-4809

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 11 March 2025.



KATE E. LEE, Maj, USAF
Appellate Government Counsel
Government Trial & Appellate Operations
1500 W. Perimeter Road, Suite 1190
Joint Base Andrews, MD
DSN: 612-4809

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

UNITED STATES)	No. ACM 40684
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Juan E. PARRA-PERALTA)	
Airman (E-2))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 2

On 8 April 2025, counsel for Appellant submitted a Motion for Enlargement of Time (Fifth) requesting an additional 30 days to submit Appellant’s assignments of error. The Government generally opposes the motion.

On 7 November 2024, in granting Appellant’s first request for an enlargement of time, this court stated, *inter alia*,

Appellant’s counsel is advised that any subsequent motions for enlargement of time shall include, in addition to the 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. Counsel is not required to re-address item (1) in each subsequent motion for enlargement of time if counsel previously replied in the affirmative.

Thereafter, Appellant’s counsel submitted four motions for enlargement of time, including the present one. In each, Appellant’s counsel stated

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has not been advised of this specific request for enlargement of time.
- (3) Appellant has not been apprised of the status of undersigned counsel’s progress on his case.
- (4) Appellant has not specifically consented to this enlargement of time.

The court has considered Appellant's motion, the Government's opposition, previous filings in this case, this court's Rules of Practice and Procedure, and applicable case law.

Accordingly, it is by the court on this 10th day of April, 2025,

ORDERED:

Appellant's Motion for Enlargement of Time (Fifth) is **GRANTED**. Appellant shall file any assignments of error **not later than 18 May 2025**.

Counsel should expect that no further enlargements of time will be granted absent statements that Appellant was provided an update of the status of counsel's progress on Appellant's case, that Appellant was advised of the request for an enlargement of time, and that Appellant agrees with the request for an enlargement of time.



FOR THE COURT



CAROL K. JOYCE
Clerk of the Court

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 2
)	
Airman (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	8 April 2025
<i>Appellant.</i>)	

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

Pursuant to Rule 23.3(m)(4) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his fifth enlargement of time to file an Assignment of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **18 May 2025**. This case was docketed with this Court on 20 September 2024. From the date of docketing to the present date, 200 days have elapsed. On the date requested, 240 days will have elapsed.

On 20 March 2024 and 25-29 March 2025, R. at 1, 75, 744, Appellant was tried by a general court-martial comprised of officer and enlisted members. R. at 15. Contrary to his pleas, R. at 18, Appellant was found guilty of one charge and two specifications of obstruction of justice, in violation of Article 82, Uniform Code of Military Justice (UCMJ), and one charge and specification of providing false information to law enforcement officers, in violation of Article 131, UCMJ. R. at 672-73. The military judge sentenced Appellant to a reduction to E-1, total forfeitures, a bad-conduct discharge, and confinement for 12 months. R. at 743. The convening authority took no action with respect to the findings or sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action. Appellant is confined.

The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Undersigned counsel is assigned 30 cases, 18 cases are pending initial AOE's before this Court. One case before the United States Supreme Court takes priority over this case: *United States v. Kelnhofer*. The petition for writ of certiorari is due in late May 2025. The petition must be prepared no later than 14 May 2025 to complete printing and file on time. Undersigned counsel has not yet begun work on this petition. Four cases before the Court of Appeals for the Armed Forces (CAAF) have priority over this case: (1) *United States v. Washington*; (2) *United States v. Couty*; (3) *United States v. Beyer*; and (4) *United States v. Covitz*. Undersigned counsel has begun work on the joint appendix in *Washington* and completed research and begun drafting in *Couty*.

In addition, the following cases before this Court take priority over the instant case:

- 1) *United States v. Barlow*, ACM 40552 – The record of trial is four volumes, consisting of six prosecution exhibits, nine defense exhibits, 16 appellate exhibits, and two court exhibits; the transcript is 338 pages. The Government's answer is due on 15 May 2025 with any reply due on 22 May 2025.
- 2) *United States v. Evangelista*, ACM 40531 – The record of trial is 10 volumes, consisting of 56 appellate exhibits, 18 prosecution exhibits, 12 defense exhibits, and one court exhibit; the transcript is 1,439 pages. Undersigned counsel has completed a review of this record. Civilian co-counsel is currently reviewing the record and preparing an assignments of error brief.
- 3) *United States v. Augustin*, ACM 40655 – The record of trial is eight volumes consisting of 10 prosecution exhibits, seven defense exhibit, and 24 appellate exhibits, and one court

exhibit. The transcript is 1,201 pages long. Civilian co-counsel has completed a review of the record. Undersigned counsel has not begun a review of this record.

4) *United States v. Hon*, ACM 40671 – The record of trial is six volumes long consisting of 14 prosecution exhibits, seven defense exhibits, 28 appellate exhibits, and one court exhibit. The transcript is 483 pages long.

5) *United States v. Sawyer*, ACM 40670 – The record of trial is five volumes consisting of 10 prosecution exhibits, 16 defense exhibits, and 25 appellate exhibits. The transcript is 245 pages long.

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

Additionally:

(1) Appellant has been advised of his right to a timely appeal.

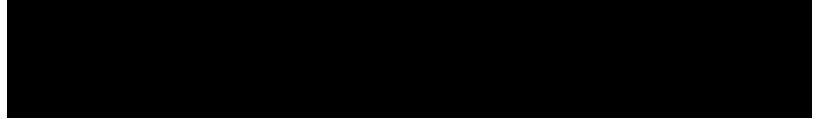
(2) Appellant has not been advised of this specific request for enlargement of time.

(3) Appellant has not been apprised of the status of undersigned counsel's progress on his case.

(4) Appellant has not specifically consented to this enlargement of time.

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

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

CERTIFICATE OF FILING AND SERVICE

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Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

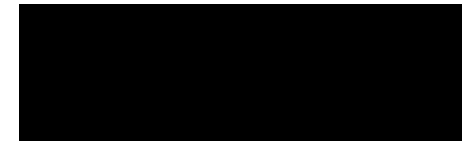
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman (E-2))	Before Panel No. 2
JUAN E. PARRA-PERALTA,)	No. ACM 40684
United States Air Force,)	
<i>Appellant.</i>)	
)	9 April 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.

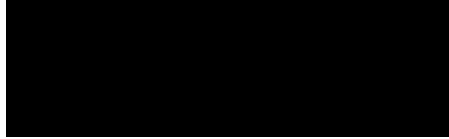
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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 9 April 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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Undersigned counsel is assigned 31 cases, 19 cases are pending initial AOE's before this Court. One case before the United States Supreme Court takes priority over this case: *United States v. Kelnhofer*. The petition for writ of certiorari must be completed before 14 May 2025. Undersigned counsel is currently drafting the petition. Three cases before the Court of Appeals for the Armed Forces (CAAF) have priority over this case: (1) *United States v. Washington*; (2) *United States v. Beyer*; (3) *United States v. Covitz*. Yesterday, undersigned counsel filed the grant brief in *Washington*. The Government's answer is due 30 May 2025, with any reply due 7 June 2025. Undersigned counsel is presently drafting the supplement brief in *Beyer*. Undersigned counsel has not yet begun work on *Covitz*.

In addition, the following cases before this Court take priority over the instant case:

- 1) *United States v. Barlow*, ACM 40552 – The record of trial is four volumes, consisting of six prosecution exhibits, nine defense exhibits, 16 appellate exhibits, and two court exhibits; the transcript is 338 pages. The Government's answer is due on 15 May 2025 with any reply due on 22 May 2025.
- 2) *United States v. Evangelista*, ACM 40531 – The record of trial is 10 volumes, consisting of 56 appellate exhibits, 18 prosecution exhibits, 12 defense exhibits, and one court exhibit; the transcript is 1,439 pages. Undersigned counsel has completed a review of this record. Civilian co-counsel is currently reviewing the record and preparing an assignments of error brief.
- 3) *United States v. Augustin*, ACM 40655 – The record of trial is eight volumes consisting of 10 prosecution exhibits, seven defense exhibit, and 24 appellate exhibits, and one court

exhibit. The transcript is 1,201 pages long. Civilian co-counsel has completed a review of the record. Undersigned counsel has not begun a review of this record.

4) *United States v. Hon*, ACM 40671 – The record of trial is six volumes long consisting of 14 prosecution exhibits, seven defense exhibits, 28 appellate exhibits, and one court exhibit. The transcript is 483 pages long.

5) *United States v. Sawyer*, ACM 40670 – The record of trial is five volumes consisting of 10 prosecution exhibits, 16 defense exhibits, and 25 appellate exhibits. The transcript is 245 pages long.

Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has consented to this enlargement of time.

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

Respectfully submitted,

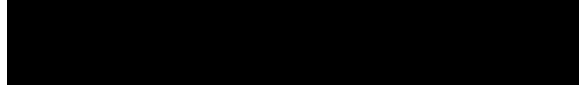


TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 8 May 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

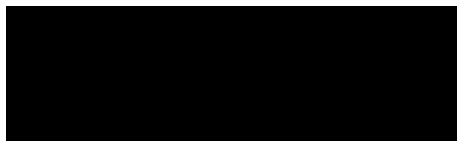
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman (E-2))	Before Panel No. 2
JUAN E. PARRA-PERALTA,)	No. ACM 40684
United States Air Force,)	
<i>Appellant.</i>)	
)	12 May 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.

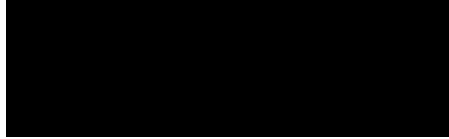
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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 12 May 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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

UNITED STATES)	No. ACM 40684
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Juan E. PARRA-PERALTA)	
Airman (E-2))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 2

On 9 June 2025, counsel for Appellant submitted a Motion for Enlargement of Time (Seventh), 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, prior filings in this case, case law, and this court’s Rules of Practice and Procedure.

Accordingly, it is by the court on this 12th day of June, 2025,

ORDERED:

Appellant’s Motion for Enlargement of Time (Seventh) is **GRANTED**. Appellant shall file any assignments of error not later than **17 July 2025**.

Further requests by Appellant for enlargements of time may necessitate a status conference.



FOR THE COURT



ROBERT DRIESSEN, Maj, USAF
Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	APPELLANT’S MOTION FOR
<i>Appellee,</i>)	ENLARGEMENT OF TIME(SEVENTH)
)	
v.)	Before Panel 2
)	
Airman (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	9 June 2025
<i>Appellant.</i>)	

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

Pursuant to Rule 23.3(m)(4) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his seventh enlargement of time to file an Assignment of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **17 July 2025**. This case was docketed with this Court on 20 September 2024. From the date of docketing to the present date, 262 days have elapsed. On the date requested, 300 days will have elapsed.

On 20 March 2024 and 25-29 March 2025, R. at 1, 75, 744, Appellant was tried by a general court-martial comprised of officer and enlisted members. R. at 15. Contrary to his pleas, R. at 18, Appellant was found guilty of one charge and two specifications of obstruction of justice, in violation of Article 82, Uniform Code of Military Justice (UCMJ), and one charge and specification of providing false information to law enforcement officers, in violation of Article 131, UCMJ. R. at 672-73. The military judge sentenced Appellant to a reduction to E-1, total forfeitures, a bad-conduct discharge, and confinement for 12 months. R. at 743. The convening authority took no action with respect to the findings or sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action. Appellant is not confined.

The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Undersigned counsel is assigned 33 cases, 20 cases are pending initial AOE's before this Court. One case before the Court of Appeals for the Armed Forces (CAAF) has priority over this case: *United States v. Washington*. The reply brief is due on 27 June 2025. Undersigned counsel has begun research on the reply.

In addition, the following cases before this Court take priority over the instant case:

- 1) *United States v. Evangelista*, ACM 40531 – The record of trial is 10 volumes, consisting of 56 appellate exhibits, 18 prosecution exhibits, 12 defense exhibits, and one court exhibit; the transcript is 1,439 pages. The reply brief in this case will be due on 14 July 2025.
- 2) *United States v. Augustin*, ACM 40655 – The record of trial is eight volumes consisting of 10 prosecution exhibits, seven defense exhibit, and 24 appellate exhibits, and one court exhibit. The transcript is 1,201 pages long. Civilian co-counsel has completed a review of the record. Undersigned counsel has not begun a review of this record.
- 3) *United States v. Hon*, ACM 40671 – The record of trial is six volumes long consisting of 14 prosecution exhibits, seven defense exhibits, 28 appellate exhibits, and one court exhibit. The transcript is 483 pages long.
- 4) *United States v. Sawyer*, ACM 40670 – The record of trial is five volumes consisting of 10 prosecution exhibits, 16 defense exhibits, and 25 appellate exhibits. The transcript is 245 pages long.

Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel

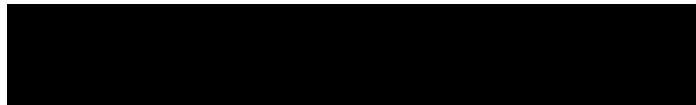
time to fully review Appellant's case and advise Appellant regarding potential errors.

Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has consented to this enlargement of time.

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

Respectfully submitted,

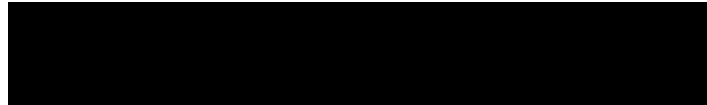


TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 9 June 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
<i>Appellee,</i>)	OPPOSITION TO APPELLANT’S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman (E-2))	Before Panel No. 2
JUAN E. PARRA-PERALTA,)	No. ACM 40684
United States Air Force,)	
<i>Appellant.</i>)	10 June 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 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.



JG [Redacted] USAF
Appellate Government Counsel
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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 10 June 2025.



JG [Redacted] USAF
Appellate Government Counsel
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

authority took no action with respect to the findings or sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action. Appellant is not confined.

The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Undersigned counsel is assigned 33 cases, 21 cases are pending initial AOE's before this Court. Two cases at the Supreme Court of the United States takes priority over this case: (1) *United States v. Pulley*; and (2) *United States v. Beyer*. Undersigned counsel has not begun work on either petition. Two cases before the Court of Appeals for the Armed Forces also take priority over this case: (1) *United States v. Gibbs* and (2) *United States v. Barlow*. Undersigned counsel has begun research on the supplement brief in *Gibbs*.

In addition, the following cases before this Court take priority over the instant case:

- 1) *United States v. Evangelista*, ACM 40531 – The record of trial is 10 volumes, consisting of 56 appellate exhibits, 18 prosecution exhibits, 12 defense exhibits, and one court exhibit; the transcript is 1,439 pages. The reply brief in this case will be due on 14 July 2025.
- 2) *United States v. Augustin*, ACM 40655 – The record of trial is eight volumes consisting of 10 prosecution exhibits, seven defense exhibit, and 24 appellate exhibits, and one court exhibit. The transcript is 1,201 pages long. Civilian co-counsel has completed a review of the record. Undersigned counsel has not begun a review of this record.
- 3) *United States v. Hon*, ACM 40671 – The record of trial is six volumes long consisting of 14 prosecution exhibits, seven defense exhibits, 28 appellate exhibits, and one court exhibit. The transcript is 483 pages long. Undersigned counsel has not begun a review of this record.

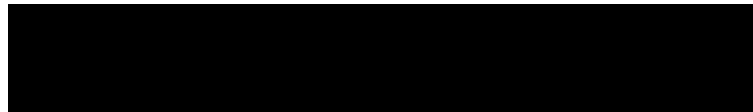
- 4) *United States v. Sawyer*, ACM 40670 – The record of trial is five volumes consisting of 10 prosecution exhibits, 16 defense exhibits, and 25 appellate exhibits. The transcript is 245 pages long. Undersigned counsel has not begun a review of this record.
- 5) *United States v. Turner*, ACM 24067 – The record of trial is six volumes long, consisting of three prosecution exhibits, and 27 appellate exhibits. The transcript is 118 pages. Undersigned counsel has not begun a review of this record.

Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has consented to this enlargement of time.

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

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 3 July 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
<i>Appellee,</i>)	OPPOSITION TO APPELLANT’S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman (E-2))	Before Panel No. 2
JUAN E. PARRA-PERALTA,)	No. ACM 40684
United States Air Force,)	
<i>Appellant.</i>)	3 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 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 330 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 7 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.



KATE E. LEE, Maj, USAF
Appellate Government Counsel
Government Trial & Appellate Operations
1500 W. Perimeter Road, Suite 1190
Joint Base Andrews, MD
DSN: 612-4804

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 3 July 2025.



KATE E. LEE, Maj, USAF
Appellate Government Counsel
Government Trial & Appellate Operations
1500 W. Perimeter Road, Suite 1190
Joint Base Andrews, MD
DSN: 612-4804

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

UNITED STATES)	No. ACM 40684
<i>Appellee</i>)	
)	
v.)	
)	NOTICE OF PANEL CHANGE
Juan E. PARRA-PERALTA)	
Airman (E-2))	
U.S. Air Force)	
<i>Appellant</i>)	

It is by the court on this 4th day of August, 2025,

ORDERED:

That the Record of Trial in the above-styled matter is withdrawn from Panel 2 and referred to Panel 3 for appellate review.

This panel letter supersedes all previous panel assignments.



FOR THE COURT



AGNIESZKA M. GAERTNER, Capt, USAF
Commissioner

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

UNITED STATES)	No. ACM 40684
<i>Appellee</i>)	
)	
v.)	
)	ORDER
JUAN E. PARRA-PERALTA)	
Airman (E-2))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 3*

On 7 August 2025, counsel for Appellant submitted a Motion for Enlargement of Time (Ninth) requesting an additional 30 days to submit Appellant’s assignments of error. Counsel for Appellant indicates there are ten cases that take priority over Appellant’s case. The Government opposes the motion, highlighting, *inter alia*, that “[i]f Appellant’s new delay request is granted, the defense delay in this case will be 360 days in length.”

On 14 August 2025, the court held a status conference to discuss this motion. Appellant was represented by Major Trevor Ward. Lieutenant Colonel Allen S. Abrams and Ms. Megan Marininos from the Appellate Defense Division were also present. Major Vanessa Bairos represented the Government. During this status conference, the court and the parties discussed appellate defense counsel’s workload specifically relating to cases with this court, the United States Court of Appeals for the Armed Forces, and the United States Supreme Court. Further, the workload of the Appellate Defense Division as a whole was also discussed. Appellant’s counsel expects to request three or four more enlargements of time. The Government maintained its opposition to Appellant’s 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 15th day of August, 2025,

ORDERED:

* On 4 August 2025, the court issued a Notice of Panel Change withdrawing this case from Panel 2 and referring it to Panel 3.

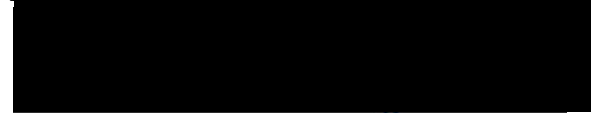
Appellant's Motion for Enlargement of Time (Ninth) is **GRANTED**. Appellant shall file any assignments of error not later than **15 September 2025**.

Additionally, any further requests for an enlargement of time may necessitate another status conference

Appellant's counsel is also advised that given the number of enlargements granted thus far, the court will continue to closely examine any further requests for an enlargement of time.



FOR THE COURT



JACOB B. HOEFERKAMP, Capt, USAF
Chief Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	APPELLANT’S MOTION FOR
<i>Appellee,</i>)	ENLARGEMENT OF TIME (NINTH)
)	
v.)	Before Panel 2
)	
Airman (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	7 August 2025
<i>Appellant.</i>)	

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

Pursuant to Rule 23.3(m)(4) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his ninth enlargement of time to file an Assignment of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **15 September 2025**. This case was docketed with this Court on 20 September 2024. From the date of docketing to the present date, 321 days have elapsed. On the date requested, 360 days will have elapsed.

On 20 March 2024 and 25-29 March 2025, R. at 1, 75, 744, Appellant was tried by a general court-martial comprised of officer and enlisted members. R. at 15. Contrary to his pleas, R. at 18, Appellant was found guilty of one charge and two specifications of obstruction of justice, in violation of Article 82, Uniform Code of Military Justice (UCMJ), and one charge and specification of providing false information to law enforcement officers, in violation of Article 131, UCMJ. R. at 672-73. The military judge sentenced Appellant to a reduction to E-1, total forfeitures, a bad-conduct discharge, and confinement for 12 months. R. at 743. The convening authority took no action with respect to the findings or sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action. Appellant is not confined.

The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Undersigned counsel is assigned 27 cases, 12 cases are pending initial AOE's before this Court. Four cases at the Supreme Court of the United States take priority over this case: (1) *United States v. Pulley*; (2) *United States v. Beyer*; (3) *United States v. Covitz*; and (4) *United States v. Arizpe*. Undersigned counsel has not begun work on any of these petitions. One case before the Court of Appeals for the Armed Forces also takes priority over this case *United States v. Barlow*. Undersigned counsel has begun research on the supplement brief in *Barlow*.

In addition, the following cases before this Court take priority over the instant case:

- 1) *United States v. Evangelista*, ACM 40531 – The record of trial is 10 volumes, consisting of 56 appellate exhibits, 18 prosecution exhibits, 12 defense exhibits, and one court exhibit; the transcript is 1,439 pages. The reply brief in this case will be due on 25 August 2025.
- 2) *United States v. Augustin*, ACM 40655 – The record of trial is eight volumes consisting of 10 prosecution exhibits, seven defense exhibit, and 24 appellate exhibits, and one court exhibit. The transcript is 1,201 pages long. Drafting has begun for the AOE in this case.
- 3) *United States v. Hon*, ACM 40671 – The record of trial is six volumes long consisting of 14 prosecution exhibits, seven defense exhibits, 28 appellate exhibits, and one court exhibit. The transcript is 483 pages long. Undersigned counsel has not begun a review of this record.
- 4) *United States v. Sawyer*, ACM 40670 – The record of trial is five volumes consisting of 10 prosecution exhibits, 16 defense exhibits, and 25 appellate exhibits. The transcript is 245 pages long. Undersigned counsel has begun drafting the AOE in this case.

5) *United States v. Turner*, ACM 24067 – The record of trial is six volumes long, consisting of three prosecution exhibits, and 27 appellate exhibits. The transcript is 118 pages. Undersigned counsel has not begun a review of this record.

Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has consented to this enlargement of time.

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

Respectfully submitted,

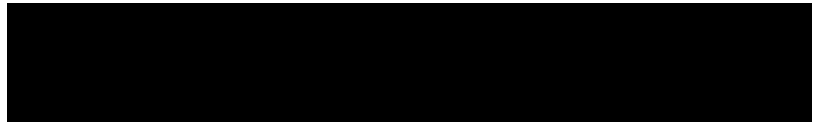


TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 7 August 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
<i>Appellee,</i>)	OPPOSITION TO APPELLANT’S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman (E-2))	Before Panel No. 2
JUAN E. PARRA-PERALTA,)	No. ACM 40684
United States Air Force,)	
<i>Appellant.</i>)	8 August 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 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 360 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 6 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.

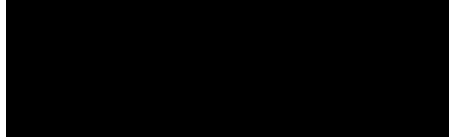
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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 8 August 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	APPELLANT'S MOTION FOR
)	ENLARGEMENT OF TIME (TENTH)
)	
v.)	Before Panel 3
)	
Airman (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	5 September 2025
<i>Appellant.</i>)	

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

Pursuant to Rule 23.3(m)(4) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his tenth enlargement of time to file an Assignment of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **15 October 2025**. This case was docketed with this Court on 20 September 2024. From the date of docketing to the present date, 350 days have elapsed. On the date requested, 390 days will have elapsed.

On 20 March 2024 and 25-29 March 2025, R. at 1, 75, 744, Appellant was tried by a general court-martial comprised of officer and enlisted members. R. at 15. Contrary to his pleas, R. at 18, Appellant was found guilty of one charge and two specifications of obstruction of justice, in violation of Article 82, Uniform Code of Military Justice (UCMJ), and one charge and specification of providing false information to law enforcement officers, in violation of Article 131, UCMJ. R. at 672-73. The military judge sentenced Appellant to a reduction to E-1, total forfeitures, a bad-conduct discharge, and confinement for 12 months. R. at 743. The convening authority took no action with respect to the findings or sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action. Appellant is not confined.



GRANTED
8 SEP 2025

The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Undersigned counsel is assigned 27 cases, 11 cases are pending initial AOE's before this Court. Three cases at the Supreme Court of the United States take priority over this case: (1) *United States v. Pulley*;¹ (2) *United States v. Beyer*; (3) *United States v. Covitz*.² Undersigned counsel has begun research and drafting in both *Beyer* and *Covitz*. One case before the Court of Appeals for the Armed Forces also takes priority over this case *United States v. Barlow*. Undersigned counsel has begun research on the supplement brief in *Barlow*. However, undersigned counsel recently discovered new evidence which may be cause for a petition for a new trial. Undersigned counsel is presently interviewing witnesses for that petition.

In addition, the following cases before this Court take priority over the instant case:

- 1) *United States v. Evangelista*, ACM 40531 – The record of trial is 10 volumes, consisting of 56 appellate exhibits, 18 prosecution exhibits, 12 defense exhibits, and one court exhibit; the transcript is 1,439 pages. The reply brief in this case is due on 8 September 2025. Undersigned counsel has completed research and is assisting civilian counsel with drafting.
- 2) *United States v. Augustin*, ACM 40655 – The record of trial is eight volumes consisting of 10 prosecution exhibits, seven defense exhibit, and 24 appellate exhibits, and one court exhibit. The transcript is 1,201 pages long. The initial brief has been filed. The reply brief is due on 22 September 2025.

¹ This appellant is likely to put in an extension request because he wishes to join a petition with another appellant. However, undersigned counsel will likely be counsel of record for that petition.

² A previous filing indicated that *United States v. Arizpe* was also a priority over this case at the Supreme Court. However, that client has decided to join a group petition for unanimous verdict. Undersigned counsel is not counsel of record for that petition.

- 3) *United States v. Lawrence*, ACM 40655 – The record of trial is two volumes, consisting of 13 prosecution exhibits, 10 defense exhibits, and five appellate exhibits. The transcript is 126 pages long.³ Undersigned counsel has begun a review of the record, and has identified several errors, to include serious ineffective assistance of counsel concerns. While undersigned counsel is endeavoring to complete the initial brief by this Court’s 25 September due date, this is unlikely given the number of priorities above this case (to include three Supreme Court petitions).
- 4) *United States v. Hon*, ACM 40671 – The record of trial is six volumes long consisting of 14 prosecution exhibits, seven defense exhibits, 28 appellate exhibits, and one court exhibit. The transcript is 483 pages long. Undersigned counsel has not begun a review of this record.
- 5) *United States v. Sawyer*, ACM 40670 – The record of trial is five volumes consisting of 10 prosecution exhibits, 16 defense exhibits, and 25 appellate exhibits. The transcript is 245 pages long. The initial brief has been filed. The reply brief is due on 29 September 2025.
- 6) *United States v. Turner*, ACM 24067 – The record of trial is six volumes long, consisting of three prosecution exhibits, and 27 appellate exhibits. The transcript is 118 pages. Undersigned counsel has not begun a review of this record.

On 22 November 2024, this Court ordered that “enlargements of time that, if granted, would expire more than 360 days after docketing, will not be granted absent exceptional circumstances.” The exceptional circumstances in this case are: (1) the number of cases older than Appellant’s on undersigned counsel’s docket; (2) the number of cases on undersigned counsel’s

³ This Court ordered that any additional enlargements in this case will not be looked favorably upon absent exceptional circumstances.

docket before the CAAF and the Supreme Court of the United States; and (3) the staffing shortages at the Appellate Defense Division coupled with a severe increase in workload.

As noted in *United States v. May*, 47 M.J. 478, 481 (C.A.A.F. 1998), there is no substitute for the briefing by appellate defense counsel on behalf of an individual appellant, even considering this Court's broad mandate for independent review. Appellant requested representation under Article 70, UCMJ, when he elected to appeal. Undersigned counsel's limited progress so far is not due to an unwillingness to familiarize himself with the case or file a brief raising substantive issues, nor is it a deliberate tactical decision in order to create an appellate issue. *See United States v. Roach*, 66 M.J. 410, 418 (C.A.A.F. 2008).

Undersigned counsel regularly examines his docket with supervisory counsel to assess the possibility of assigning substitute counsel to expedite review of Appellant's case. However, no such substitute counsel has been identified due to the Appellate Defense Division's workload. For a more detailed accounting of the staffing shortages at the Appellate Defense Division, our dramatically increased workload, and the attempts to mitigate these problems, please see the attached appendix. *See generally* Mot. to Attch., App'x A.

Further, undersigned counsel is scheduled for leave to visit his partner's family this coming week (11-15 September 2025). Because of mission needs, undersigned counsel has not taken leave without working substantial hours (i.e., more than five hours each day) since becoming an area defense counsel in November of 2021 (four years ago). As articulated in several motions to this Court in the Fall and Winter of 2024 and 2025, this has seriously impacted undersigned counsel's health and work product. *See, e.g., United States v. Barlow*, No. ACM 40552, (order granting motion for enlargement of time (tenth)), at 4-5. Undersigned counsel, therefore, does not intend to do work while on this scheduled leave, absent this Court's explicit order to do so.

Counsel simply cannot work faster without sacrificing his competent representation, which he owes to his clients. For example, in *United States v. Gibbs*, this Court thought it appropriate to deny an enlargement of time when assigned appellate counsel had not begun a review of the record. No. ACM 40523, slip op. at 21 (A.F. Ct. Crim. App. May 20, 2025). As this Court noted, its denial of that enlargement resulted in subpar representation. *See id.* at 23 n.10 (acknowledging that this Court identified an error that assigned appellate defense counsel failed to identify). As in *Gibbs*, this Court cannot deny this enlargement without sacrificing Appellant's right to effective representation.

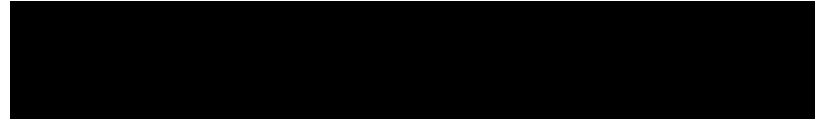
This Court has authority to ask the Judge Advocate General to provide the appellate defense division with additional manning. *Roach*, 66 M.J. at 418. It has failed to do so, despite this division's repeated requests. Instead, it has denied enlargements of time resulting in deficient performance of counsel. *See Gibbs*, slip. op. at 21. This Court should not deprive appellants of their constitutional right to counsel who, due to no fault of their own, have had their appeals substantially delayed by the Government's failure to adequately staff this division. This Court can and should request additional personnel be assigned before ever considering denying an EOT.

Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has consented to this enlargement of time.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time for good cause shown. If this Court believes denial of this motion is appropriate, Appellant *demand*s a status conference.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 5 September 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
<i>Appellee,</i>)	OPPOSITION TO APPELLANT’S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman (E-2))	Before Panel No. 3
JUAN E. PARRA-PERALTA,)	No. ACM 40684
United States Air Force,)	
<i>Appellant.</i>)	5 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 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 over 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 390 days in length. Appellant’s over 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 5 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.

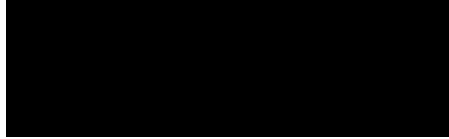
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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 5 September 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	MOTION TO ATTACH
)	APPENDIX
)	
)	
v.)	Before Panel 3
)	
Airman (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	5 September 2025
<i>Appellant.</i>)	

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

Pursuant to Rules 23.3(b) of this Honorable Court’s Rules of Practice and Procedure, Appellant moves to attach the Appendix to this motion to the record of trial. The Appendix is a declaration from Lieutenant Colonel Allen Abrams, Deputy Chief of the Appellate Defense Division. The declaration outlines the manning and workload challenges facing the Appellate Defense Division.

This declaration is relevant and necessary for two reasons: (1) to substantiate exceptional circumstances to comply with this Court’s order; and (2) demonstrate that the post-trial delay in this case is caused by the Government’s failure to adequately staff the Appellate Defense Division and this Court’s failure to request additional personnel be assigned.

WHEREFORE, Appellant requests this Court grant this motion to attach.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

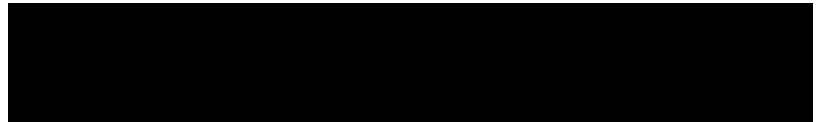


MOOT
16 SEP 2025

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 Government Trial and Appellate Operations Division on 5 September 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES <i>Appellee,</i>)	MOTION FOR RECONSIDERATION <i>EN BANC</i>
)	
)	
v.)	Before Panel No. 3
)	
Airman (E-2))	Case No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	
<i>Appellant.</i>)	16 September 2025

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

Pursuant to Rules 27 and 31 of the Joint Rules of Appellate Procedure, Appellant hereby moves this Court to reconsider, en banc, its interlocutory order dated 16 September 2025. That order denied, as moot, Appellant’s motion to attach a declaration detailing the staffing problems at the Appellate Defense Division. This Court’s order conflicts with the decisions of this Court granting comparable motions. Additionally, this order conflicts with the fundamental principle that mootness arises only when a decision would have no impact on the parties. Therefore, this Court should reconsider, en banc, its decision denying Appellant’s Motion to Attach.

I. Factual background.

On 5 September 2025, Appellant moved this Court for an enlargement of time (EOT) to file an assignments of error brief. Motion for EOT (Tenth). That motion for EOT had to include “exceptional circumstances.” *United States v. Parra-Peralta*, No. ACM 40684 (A.F. Ct. Crim. App. Nov. 22, 2024) (order mandating that “enlargements of time [after] 360 days . . . will not be granted absent exceptional circumstances”). One of the exceptional circumstances noted by

Appellant was the staffing shortages and increased workload of the Appellate Defense Division. Motion for EOT (Tenth).

On the same day he filed his motion for EOT, Appellant also filed a motion to attach a declaration from Lieutenant Colonel (Lt Col) Allen Abrams. Motion to Attach. That declaration outlines the manning and workload challenges experienced by the Appellate Defense Division. Motion to Attach at 1-2. In that motion, Appellant told this Court that the declaration is “relevant and necessary for *two reasons*.” Motion to Attach at 1 (emphasis added). One of those reasons had to do with the motion for EOT: “to substantiate exceptional circumstances.” Motion to Attach at 1. The other was unrelated to the motion for EOT: “demonstrate[ing] that the post-trial delay in this case is caused by the Government’s failure to adequately staff the Appellate Defense Division and this Court’s failure to request additional personnel be assigned.” Motion to Attach at 1.

On 8 September 2025, this Court granted Appellant’s motion for EOT (Tenth). And then, on 16 September 2025, this Court denied, as moot, Appellant’s motion to attach. This Court did not explain how or why the motion to attach was moot.

No other court has obtained jurisdiction over this case.

II. Reconsideration is necessary because the motion is not moot.

A matter is moot when it is “deprived of practical significance; made abstract or purely academic.” *Moot*, MERRIAM-WEBSTER’S DICTIONARY OF LAW (2011); *see Moot*, BLACK’S LAW DICTIONARY (11th ed. 2019) (“To render (a question) moot of or no practical significance.”); *Mootness*, BLACK’S LAW DICTIONARY (11th ed. 2019) (“[A] case that presents only an abstract question that does not arise from existing facts or rights.”); *cf. United States v. Roan*, __ M.J. __, slip. op. at 2 (C.A.A.F. Sep. 16, 2025) (explaining that because the conviction was set aside for Issue I (a *Brady* violation), Issue II (alleging a violation of a Rule for Courts-Martial) was moot);

United States v. Folts, No. 25-0043, __ M.J. __, 2025 CAAF LEXIS 689, at *2 n.2 (C.A.A.F. Aug. 18, 2025) (explaining that the constitutional challenge was moot because the court lacked authority to act on the challenge).

This Court denied Appellant’s motion to attach as moot without explanation. However, based on the timeline of events—the granting of the motion for EOT (Tenth) on 8 September and denying the motion to attach on 16 September—this denial was presumably based on this Court granting the motion for EOT (Tenth). But this would ignore Appellant’s second stated reason for moving to attach the declaration: to demonstrate the post-trial delay was caused not by Appellant and, rather, the Government countenanced this Court. This is pertinent to this Court’s consideration of post-trial delay in this case. To be sure, Appellant intends to raise a post-trial delay issue both under the due process clause of the Constitution and 10 U.S.C. § 866(d)(2). Absent the Government’s concession, there remains a controversy which this Court must resolve concerning post-trial delay. And, as a result, the motion cannot be denied as moot (i.e., there is a practical purpose for the motion to attach even after this Court granted the motion for EOT). Because the motion to attach is not moot, there is good cause for this Court to reconsider.

III. En banc reconsideration is necessary.

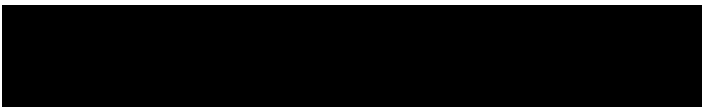
En banc reconsideration is necessary because various panels of this Court—to include this panel—have previously granted comparable motions to attach the same declaration. For example, on 28 July 2025, Panel 2 of this Court granted a substantively identical motion to attach. *See United States v. Lawrence*, No. ACM 24064 (A.F. Ct. Crim. App. July 28, 2025) (order granting Motion to Attach). On 19 and 20 February 2025, that same panel granted motions to attach, even though it ultimately denied the appellants’ motions for reconsideration. *Compare United States v. Philpot*, No. ACM 40751 (A.F. Ct. Crim. App. Feb. 20, 2025) (order granting motion to attach), and *United*

States v. Grant, No. ACM S32804 (A.F. Ct. Crim. App. Feb. 19, 2025) (order granting motion to attach), with *United States v. Philpot*, No. ACM 40751 (A.F. Ct. Crim. App. Feb. 20, 2025) (order denying motion for reconsideration), and *United States v. Grant*, No. ACM S32804 (A.F. Ct. Crim. App. Feb. 19, 2025) (order denying motion for reconsideration).

In fact, this very panel has granted a comparable motion to attach in a case strikingly similar to this one. In *United States v. Evangelista*, the appellant filed a motion for EOT (Thirteenth). While that motion was pending before this Court, the appellant filed a motion to attach the same declaration. This Court ultimately granted the motion for EOT (Thirteenth) on 6 February 2025, and still granted appellant's motion to attach nearly a week later. Compare *United States v. Evangelista*, No. ACM 40531 (A.F. Ct. Crim. App. Feb. 6, 2025) (order granting motion for EOT (Thirteenth)), with *Evangelista*, No. ACM 40531 (A.F. Ct. Crim. App. Feb. 13, 2025) (order granting motion to attach).

The disparity in this Court's interlocutory orders is striking. En banc reconsideration is necessary to bring consistency to this Court. This is particularly important where the underlying issue concerns evidence of post-trial delay, an error this Court regularly confronts in its cases. Therefore, this Court should grant reconsideration en banc and grant Appellant's Motion to Attach.

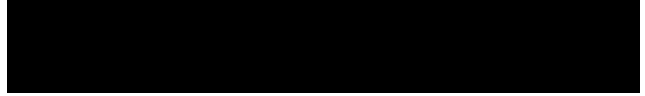
Respectfully Submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
1500 West Perimeter Road, Suite 1100
Joint Base Andrews, MD 20762

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were delivered by e-mail to the Court and served on the Government Trial and Appellate Operations Division on 16 September 2025.



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
1500 West Perimeter Road, Suite 1100
Joint Base Andrews, MD 20762
(240) 612-4770

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

UNITED STATES <i>Appellee</i>)	No. ACM 40684
)	
v.)	
)	ORDER
Juan E. PARRA PERALTA Airman (E-2) U.S. Air Force <i>Appellant</i>)	Panel 3

On 16 September 2025, in a Motion for Reconsideration *En Banc*, Appellant moved this court to “reconsider, en banc, its decision denying Appellant’s [5 September 2025] Motion to Attach.” The attachment was a declaration signed on 24 January 2025 by the Deputy Chief, Air Force Appellate Defense Division. The motion to attach was filed on the same date as Appellant’s motion for a tenth enlargement of time, which this court granted on 8 September 2025, thus mooted Appellant’s 5 September 2025 motion to attach. The Government did not file an opposition.

As to Appellant’s Motion for Reconsideration *En Banc* and in accordance with Rule 27(c) of The Joint Rules of Appellate Procedure for Courts of Criminal Appeals, Appellant’s motion was transmitted to each judge of the court who was present for duty and not disqualified from participation due to a conflict of interest. No participating judge voted to reconsider the order en banc.

The above referenced declaration may become relevant to a later request for an enlargement of time or a later assignment of error if one is ultimately filed in this case.

Accordingly, it is by the court on this 24th day of September, 2025,

ORDERED:

Appellant’s Motion for Reconsideration *En Banc* is **DENIED**.



FOR THE COURT



CAROL K. JOYCE
Clerk of the Court

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	APPELLANT’S MOTION FOR ENLARGEMENT OF TIME (ELEVENTH) – OUT OF TIME
<i>Appellee,</i>)	
)	
v.)	Before Panel 3
)	
Airman (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	24 October 2025
<i>Appellant.</i>)	

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

Pursuant to Rule 23.3(m)(4) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his eleventh enlargement of time to file an Assignment of Error (AOE), out of time. Appellant requests an enlargement for a period of 30 days, which will end on **14 November 2025**. This case was docketed with this Court on 20 September 2024. From the date of docketing to the present date, 369 days have elapsed. On the date requested, 390 days will have elapsed.

On 20 March 2024 and 25-29 March 2025, R. at 1, 75, 744, Appellant was tried by a general court-martial comprised of officer and enlisted members. R. at 15. Contrary to his pleas, R. at 18, Appellant was found guilty of one charge and two specifications of obstruction of justice, in violation of Article 82, Uniform Code of Military Justice (UCMJ), and one charge and specification of providing false information to law enforcement officers, in violation of Article 131, UCMJ. R. at 672-73. The military judge sentenced Appellant to a reduction to E-1, total forfeitures, a bad-conduct discharge, and confinement for 12 months. R. at 743. The convening authority took no action with respect to the findings or sentence. Record of Trial (ROT), Vol. 1,

g Authority Decision on Action. Appellant is not confined.



GRANTED

3 Nov 2025

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Undersigned counsel is assigned 27 cases, 9 cases are pending initial AOE's before this Court. Three cases at the Supreme Court of the United States take priority over this case: (1) *United States v. Pulley*; (2) *United States v. Beyer*; (3) *United States v. Covitz*. Undersigned counsel has drafted the briefs in *Beyer* and *Covitz*. All three briefs are due the end of November and early December 2025. One case before the Court of Appeals for the Armed Forces also takes priority over this case: *United States v. Cooley*. Undersigned counsel has reviewed the record—as this case was transferred from an attorney that left the appellate defense division—and has begun drafting the supplement brief.

In addition, the following cases before this Court take priority over the instant case:

- 1) *United States v. Augustin*, ACM 40655 – The record of trial is eight volumes consisting of 10 prosecution exhibits, seven defense exhibit, and 24 appellate exhibits, and one court exhibit. The transcript is 1,201 pages long. Undersigned counsel is presently drafting the reply brief.
- 2) *United States v. Lawrence*, ACM 40655 – The record of trial is two volumes, consisting of 13 prosecution exhibits, 10 defense exhibits, and five appellate exhibits. The transcript is 126 pages long. Undersigned counsel has completed a review of the record, identified several errors, and has begun drafting. However, one identified error requires the appointment of a confidential expert consultant, which the Government denied. This appellant is moving this Court to compel the appointment of such an expert.
- 3) *United States v. Hon*, ACM 40671 – The record of trial is six volumes long consisting of 14 prosecution exhibits, seven defense exhibits, 28 appellate exhibits, and one court

exhibit. The transcript is 483 pages long. Undersigned counsel has not begun a review of this record.

- 4) *United States v. Turner*, ACM 24067 – The record of trial is six volumes long, consisting of three prosecution exhibits, and 27 appellate exhibits. The transcript is 118 pages. Undersigned counsel has not begun a review of this record.

On 22 November 2024, this Court ordered that “enlargements of time that, if granted, would expire more than 360 days after docketing, will not be granted absent exceptional circumstances.” The exceptional circumstances in this case are: (1) the number of cases older than Appellant’s on undersigned counsel’s docket; (2) the number of cases on undersigned counsel’s docket before the CAAF and the Supreme Court of the United States; and (3) the staffing shortages at the Appellate Defense Division coupled with a severe increase in workload.

As noted in *United States v. May*, 47 M.J. 478, 481 (C.A.A.F. 1998), there is no substitute for the briefing by appellate defense counsel on behalf of an individual appellant, even considering this Court’s broad mandate for independent review. Appellant requested representation under Article 70, UCMJ, when he elected to appeal. Undersigned counsel’s limited progress so far is not due to an unwillingness to familiarize himself with the case or file a brief raising substantive issues, nor is it a deliberate tactical decision in order to create an appellate issue. *See United States v. Roach*, 66 M.J. 410, 418 (C.A.A.F. 2008).

Undersigned counsel regularly examines his docket with supervisory counsel to assess the possibility of assigning substitute counsel to expedite review of Appellant’s case. However, no such substitute counsel has been identified due to the Appellate Defense Division’s workload. For a more detailed accounting of the staffing shortages at the Appellate Defense Division, our

dramatically increased workload, and the attempts to mitigate these problems, please see the attached appendix. *See generally* Mot. to Attch., App'x A.

Counsel simply cannot work faster without sacrificing his competent representation, which he owes to his clients. For example, in *United States v. Gibbs*, this Court thought it appropriate to deny an enlargement of time when assigned appellate counsel had not begun a review of the record. No. ACM 40523, slip op. at 21 (A.F. Ct. Crim. App. May 20, 2025). As this Court noted, its denial of that enlargement resulted in subpar representation. *See id.* at 23 n.10 (acknowledging that this Court identified an error that assigned appellate defense counsel failed to identify). As in *Gibbs*, this Court cannot deny this enlargement without sacrificing Appellant's right to effective representation.

This Court has authority to ask the Judge Advocate General to provide the appellate defense division with additional manning. *Roach*, 66 M.J. at 418. It has failed to do so, despite this division's repeated requests. Instead, it has denied enlargements of time resulting in deficient performance of counsel. *See Gibbs*, slip. op. at 21. This Court should not deprive appellants of their constitutional right to counsel who, due to no fault of their own, have had their appeals substantially delayed by the Government's failure to adequately staff this division. This Court can and should request additional personnel be assigned before ever considering denying an EOT.

In addition to the above, the undersigned was also selected to serve as the backfill director of staff for the military justice and discipline directorate. This has required approximately one week of work in the last month to train on the job and fill the position.

There is good cause to grant this out of time filing. Today, 24 October 2025, a commissioner of this Court emailed undersigned counsel asking whether a brief of EOT had been filed in this case. After receiving this email, undersigned counsel immediately checked his

records—no filing was made. In the two and a half years undersigned counsel has been working at the appellate defense division, he has never missed a filing deadline with this Court. Upon realizing this error, undersigned counsel conducted due diligence and discovered that the appellate defense division’s internal docket—which the undersigned does not have access to and cannot edit—had wrongly moved Appellant’s case from cases pending before this Court.

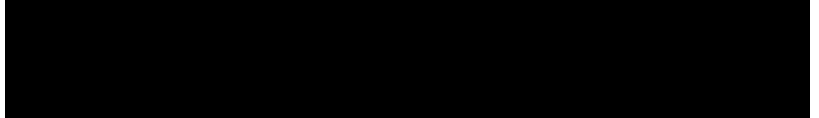
Undersigned counsel’s practice for the last two and a half years has been to weekly check the internal docket (typically on Monday), and prepare enlargements of time in accordance with that docket. Because Appellant’s case was wrongly moved out of cases pending before this Court, the undersigned counsel missed the deadline to file this EOT. This error was at no fault of the Appellant, and this Court should grant this EOT.

Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant’s case. An enlargement of time is necessary to allow counsel time to fully review Appellant’s case and advise Appellant regarding potential errors. Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel’s progress on his case.
- (4) Appellant has consented to this enlargement of time.

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

Respectfully submitted,

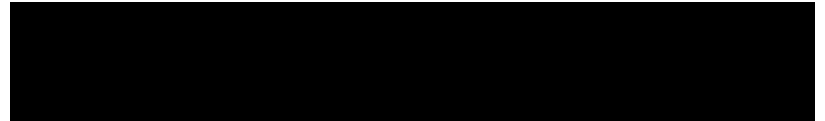


TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 24 October 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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.)	OUT OF TIME
)	
)	Before Panel No. 3
Airman (E-2))	
JUAN E. PARRA-PERALTA,)	No. ACM 40684
United States Air Force.)	
<i>Appellant</i>)	28 October 2025

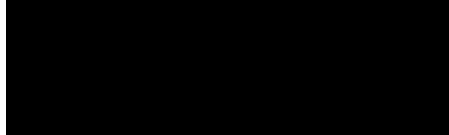
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court’s Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant’s Motion for Enlargement of Time, Out 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 over a year to submit an assignment of error to this Court. Appellant incorrectly stated in their Motion for Enlargement of Time, Out of Time, that 390 days will have elapsed if the motion is granted. This case was docketed with this Court on 20 September 2024. From the date of docketing to the present date, 403 days have elapsed. If Appellant’s new delay request is granted, the defense delay in this case will be 420 days in length. Appellant’s 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 over two-thirds of the 18-month standard for this Court to issue a decision, which only leaves about 4 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.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel
Government Trial & Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

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 October 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel
Government Trial & Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
(240) 612-4800

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	APPELLANT’S MOTION FOR
<i>Appellee,</i>)	ENLARGEMENT OF TIME
)	(TWELFTH) – AMENDED
)	
v.)	Before Panel 3
)	
Airman (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	7 November 2025
<i>Appellant.</i>)	

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

Pursuant to Rule 23.3(m)(4) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his twelfth enlargement of time to file an Assignment of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **14 December 2025**. This case was docketed with this Court on 20 September 2024. From the date of docketing to the present date, 412 days have elapsed. On the date requested, 450 days will have elapsed.

On 20 March 2024 and 25-29 March 2025, R. at 1, 75, 744, Appellant was tried by a general court-martial comprised of officer and enlisted members. R. at 15. Contrary to his pleas, R. at 18, Appellant was found guilty of one charge and two specifications of obstruction of justice, in violation of Article 82, Uniform Code of Military Justice (UCMJ), and one charge and specification of providing false information to law enforcement officers, in violation of Article 131, UCMJ. R. at 672-73. The military judge sentenced Appellant to a reduction to E-1, total forfeitures, a bad-conduct discharge, and confinement for 12 months. R. at 743. The convening authority took no action with respect to the findings or sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action. Appellant is not confined.

The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Undersigned counsel is assigned 27 cases, 9 cases are pending initial AOE's before this Court. Three cases at the Supreme Court of the United States take priority over this case: (1) *United States v. Pulley*; (2) *United States v. Beyer*; (3) *United States v. Covitz*. Undersigned counsel has completed drafting the brief in *Beyer* and has started drafting the brief in *Covitz*. All three briefs are due the end of November and early December 2025. One case before the Court of Appeals for the Armed Forces also takes priority over this case: *United States v. Cooley*. Undersigned counsel has reviewed the record—as this case was transferred from an attorney that left the appellate defense division—and has begun drafting the supplement brief. This supplement will be completed over this coming holiday weekend.¹

In addition, the following cases before this Court take priority over the instant case:

- 1) *United States v. Lawrence*, ACM 40655 – The record of trial is two volumes, consisting of 13 prosecution exhibits, 10 defense exhibits, and five appellate exhibits. The transcript is 126 pages long. Undersigned counsel has completed a review of the record, identified several errors, and has begun drafting. However, one identified error requires the appointment of a confidential expert consultant, which the Government denied. This appellant will be filing a motion to compel the Government to provide an expert with this Court.
- 2) *United States v. Hon*, ACM 40671 – The record of trial is six volumes long consisting of 14 prosecution exhibits, seven defense exhibits, 28 appellate exhibits, and one court

¹ Like many of the attorneys at the Appellate Defense Division, undersigned counsel cannot afford the luxury of weekends, family days, or holidays, nor can he take leave without working significant hours during that leave.

exhibit. The transcript is 483 pages long. Undersigned counsel has not begun a review of this record.

- 3) *United States v. Turner*, ACM 24067 – The record of trial is six volumes long, consisting of three prosecution exhibits, and 27 appellate exhibits. The transcript is 118 pages. Undersigned counsel has not begun a review of this record.

Additionally, in the time since the last motion for EOT, undersigned counsel had to review the over 1,000 page record in *United States v. Echaluse*, a case undersigned counsel inherited from another counsel. This had to be completed in order to respond to a Government motion for reconsideration, which was also completed in the time since the last motion for EOT.

On 22 November 2024, this Court ordered that “enlargements of time that, if granted, would expire more than 360 days after docketing, will not be granted absent exceptional circumstances.” The exceptional circumstances in this case are: (1) the number of cases older than Appellant’s on undersigned counsel’s docket; (2) the number of cases on undersigned counsel’s docket before the CAAF and the Supreme Court of the United States; and (3) the staffing shortages at the Appellate Defense Division coupled with a severe increase in workload.

As noted in *United States v. May*, 47 M.J. 478, 481 (C.A.A.F. 1998), there is no substitute for the briefing by appellate defense counsel on behalf of an individual appellant, even considering this Court’s broad mandate for independent review. Appellant requested representation under Article 70, UCMJ, when he elected to appeal. Undersigned counsel’s limited progress so far is not due to an unwillingness to familiarize himself with the case or file a brief raising substantive issues, nor is it a deliberate tactical decision in order to create an appellate issue. *See United States v. Roach*, 66 M.J. 410, 418 (C.A.A.F. 2008).

Undersigned counsel regularly examines his docket with supervisory counsel to assess the possibility of assigning substitute counsel to expedite review of Appellant's case. However, no such substitute counsel has been identified due to the Appellate Defense Division's workload. For a more detailed accounting of the staffing shortages at the Appellate Defense Division, our dramatically increased workload, and the attempts to mitigate these problems, please see the attached appendix. *See generally* Mot. to Attch., App'x A.

Counsel simply cannot work faster without sacrificing his competent representation, which he owes to his clients. For example, in *United States v. Gibbs*, this Court thought it appropriate to deny an enlargement of time when assigned appellate counsel had not begun a review of the record. No. ACM 40523, slip op. at 21 (A.F. Ct. Crim. App. May 20, 2025). As this Court noted, its denial of that enlargement resulted in subpar representation. *See id.* at 23 n.10 (acknowledging that this Court identified an error that assigned appellate defense counsel failed to identify). As in *Gibbs*, this Court cannot deny this enlargement without sacrificing Appellant's right to effective representation.

This Court has authority to ask the Judge Advocate General to provide the appellate defense division with additional manning. *Roach*, 66 M.J. at 418. It has failed to do so, despite this division's repeated requests. Instead, it has denied enlargements of time resulting in deficient performance of counsel. *See Gibbs*, slip. op. at 21. This Court should not deprive appellants of their constitutional right to counsel who, due to no fault of their own, have had their appeals substantially delayed by the Government's failure to adequately staff this division. This Court can and should request additional personnel be assigned before ever considering denying an EOT.

In addition to the above, the undersigned was also selected to serve as the backfill director of staff for the military justice and discipline directorate. This has required approximately one week of work in the last month to train on the job and fill the position.

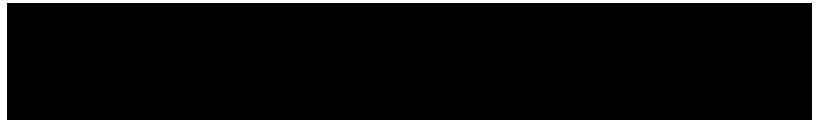
Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors.

Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has consented to this enlargement of time.

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

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 7 November 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	APPELLANT’S MOTION TO
<i>Appellee,</i>)	AMEND
)	
v.)	Before Panel 3
)	
Airman (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	7 November 2025
<i>Appellant.</i>)	

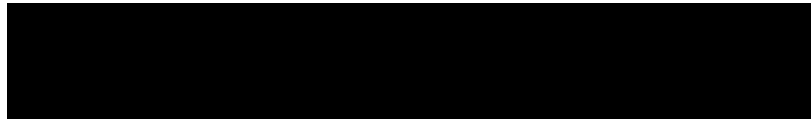
TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:

Pursuant to Rule 23.3(n) of this Honorable Court’s Rules of Practice and Procedure, Appellant moves to amend the following motion filed on 6 November 2025: Appellant’s Motion for Enlargement of Time (Twelfth).

Appellant has amended this motion, removing the word “meritless” to refer to the Government’s motion for reconsideration in *United States v. Echaluse*. The corrected motion is filed contemporaneous with this filing.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the mtion to amend.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 7 November 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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

UNITED STATES)	No. ACM 40684
<i>Appellee</i>)	
)	
v.)	
)	ORDER
JUAN E. PARRA-PERALTA)	
Airman (E-2))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 3

On 6 November 2025, counsel for Appellant submitted a Motion for Enlargement of Time (Twelfth) requesting an additional 30 days to submit Appellant’s assignments of error.

On 7 November 2025, counsel for Appellant submitted a motion to amend its 6 November 2025 motion for twelfth enlargement of time, accompanied by an amended Motion for Enlargement of Time (Twelfth), requesting an additional 30 days to submit Appellant’s assignments of error.

On 10 November 2025, the Government opposed Appellant’s request for an enlargement of time.

On 14 November 2025, the court held a status conference to discuss this motion. This is the second status conference the court has held in this case. Appellant was represented by Major Trevor Ward; Lieutenant Colonel Allen S. Abrams from the Appellate Defense Division was also present. Major Kate E. Lee represented the Government. Major Lee stated the Government did not intend to oppose the motion to amend the enlargement of time by defense.

The court and parties discussed the progress in the case. Appellate counsel informed the court he has not begun reviewing the record of trial in the case and confirmed that he has made Appellant aware of that fact when Appellant consented to the request for an enlargement of time. The court then discussed the possibility of reassigning this case or a higher priority case currently with Major Ward to another counsel to facilitate review of this case. Lt Col Abrams stated current workload made reassignment of this case unlikely and agreed to continue to look at options for reassignment. The workload of the Appellate Counsel and the Appellate Defense Division as a whole was also discussed.

The court expressed a hope this would be the last request for an extension of time. The court explained the ability of this counsel in a separate case to complete review of a longer transcript and file a reply in seven days leads the

court to believe Appellate counsel can file a brief in this case without an additional extension of time. Appellate counsel estimated he would likely need to make two more requests for extensions of time in this case. The court explained it would be hesitant to grant further requests for extensions of time and if granted additional extensions may be granted in part.

The Government maintained its opposition to Appellant's request for an enlargement of time.

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 14th day of November 2025,

ORDERED:

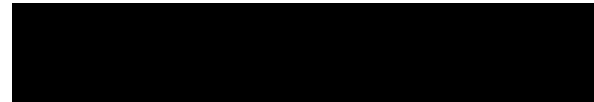
Appellant's Motion to Amend and Amended Motion for Enlargement of Time (Twelfth), dated 7 November 2025, are **GRANTED**. Appellant shall file any assignments of error not later than **14 December 2025**.

Appellant's Motion for Enlargement of Time (Twelfth), dated 6 November 2025, is **MOOT**.

Appellant's counsel is also advised that given the number of enlargements granted thus far, the court will continue to closely examine any further requests for an enlargement of time. Additionally, any further requests for an enlargement of time may necessitate another status conference.



FOR THE COURT



JACOB B. HOEFERKAMP, ⁶Capt, USAF
Chief Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	APPELLANT’S MOTION FOR
<i>Appellee,</i>)	ENLARGEMENT OF TIME
)	(TWELFTH)
)	
v.)	Before Panel 3
)	
Airman (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	6 November 2025
<i>Appellant.</i>)	

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

Pursuant to Rule 23.3(m)(4) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his twelfth enlargement of time to file an Assignment of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **14 December 2025**. This case was docketed with this Court on 20 September 2024. From the date of docketing to the present date, 412 days have elapsed. On the date requested, 450 days will have elapsed.

On 20 March 2024 and 25-29 March 2025, R. at 1, 75, 744, Appellant was tried by a general court-martial comprised of officer and enlisted members. R. at 15. Contrary to his pleas, R. at 18, Appellant was found guilty of one charge and two specifications of obstruction of justice, in violation of Article 82, Uniform Code of Military Justice (UCMJ), and one charge and specification of providing false information to law enforcement officers, in violation of Article 131, UCMJ. R. at 672-73. The military judge sentenced Appellant to a reduction to E-1, total forfeitures, a bad-conduct discharge, and confinement for 12 months. R. at 743. The convening authority took no action with respect to the findings or sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action. Appellant is not confined.

The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Undersigned counsel is assigned 27 cases, 9 cases are pending initial AOE's before this Court. Three cases at the Supreme Court of the United States take priority over this case: (1) *United States v. Pulley*; (2) *United States v. Beyer*; (3) *United States v. Covitz*. Undersigned counsel has completed drafting the brief in *Beyer* and has started drafting the brief in *Covitz*. All three briefs are due the end of November and early December 2025. One case before the Court of Appeals for the Armed Forces also takes priority over this case: *United States v. Cooley*. Undersigned counsel has reviewed the record—as this case was transferred from an attorney that left the appellate defense division—and has begun drafting the supplement brief. This supplement will be completed over this coming holiday weekend.¹

In addition, the following cases before this Court take priority over the instant case:

- 1) *United States v. Lawrence*, ACM 40655 – The record of trial is two volumes, consisting of 13 prosecution exhibits, 10 defense exhibits, and five appellate exhibits. The transcript is 126 pages long. Undersigned counsel has completed a review of the record, identified several errors, and has begun drafting. However, one identified error requires the appointment of a confidential expert consultant, which the Government denied. This appellant will be filing a motion to compel the Government to provide an expert with this Court.
- 2) *United States v. Hon*, ACM 40671 – The record of trial is six volumes long consisting of 14 prosecution exhibits, seven defense exhibits, 28 appellate exhibits, and one court

¹ Like many of the attorneys at the Appellate Defense Division, undersigned counsel cannot afford the luxury of weekends, family days, or holidays, nor can he take leave without working significant hours during that leave.

exhibit. The transcript is 483 pages long. Undersigned counsel has not begun a review of this record.

- 3) *United States v. Turner*, ACM 24067 – The record of trial is six volumes long, consisting of three prosecution exhibits, and 27 appellate exhibits. The transcript is 118 pages. Undersigned counsel has not begun a review of this record.

Additionally, in the time since the last motion for EOT, undersigned counsel had to review the over 1,000 page record in *United States v. Echaluse*, a case undersigned counsel inherited from another counsel. This had to be completed in order to respond to a meritless Government motion for reconsideration, which was also completed in the time since the last motion for EOT.

On 22 November 2024, this Court ordered that “enlargements of time that, if granted, would expire more than 360 days after docketing, will not be granted absent exceptional circumstances.” The exceptional circumstances in this case are: (1) the number of cases older than Appellant’s on undersigned counsel’s docket; (2) the number of cases on undersigned counsel’s docket before the CAAF and the Supreme Court of the United States; and (3) the staffing shortages at the Appellate Defense Division coupled with a severe increase in workload.

As noted in *United States v. May*, 47 M.J. 478, 481 (C.A.A.F. 1998), there is no substitute for the briefing by appellate defense counsel on behalf of an individual appellant, even considering this Court’s broad mandate for independent review. Appellant requested representation under Article 70, UCMJ, when he elected to appeal. Undersigned counsel’s limited progress so far is not due to an unwillingness to familiarize himself with the case or file a brief raising substantive issues, nor is it a deliberate tactical decision in order to create an appellate issue. *See United States v. Roach*, 66 M.J. 410, 418 (C.A.A.F. 2008).

Undersigned counsel regularly examines his docket with supervisory counsel to assess the possibility of assigning substitute counsel to expedite review of Appellant's case. However, no such substitute counsel has been identified due to the Appellate Defense Division's workload. For a more detailed accounting of the staffing shortages at the Appellate Defense Division, our dramatically increased workload, and the attempts to mitigate these problems, please see the attached appendix. *See generally* Mot. to Attch., App'x A.

Counsel simply cannot work faster without sacrificing his competent representation, which he owes to his clients. For example, in *United States v. Gibbs*, this Court thought it appropriate to deny an enlargement of time when assigned appellate counsel had not begun a review of the record. No. ACM 40523, slip op. at 21 (A.F. Ct. Crim. App. May 20, 2025). As this Court noted, its denial of that enlargement resulted in subpar representation. *See id.* at 23 n.10 (acknowledging that this Court identified an error that assigned appellate defense counsel failed to identify). As in *Gibbs*, this Court cannot deny this enlargement without sacrificing Appellant's right to effective representation.

This Court has authority to ask the Judge Advocate General to provide the appellate defense division with additional manning. *Roach*, 66 M.J. at 418. It has failed to do so, despite this division's repeated requests. Instead, it has denied enlargements of time resulting in deficient performance of counsel. *See Gibbs*, slip. op. at 21. This Court should not deprive appellants of their constitutional right to counsel who, due to no fault of their own, have had their appeals substantially delayed by the Government's failure to adequately staff this division. This Court can and should request additional personnel be assigned before ever considering denying an EOT.

In addition to the above, the undersigned was also selected to serve as the backfill director of staff for the military justice and discipline directorate. This has required approximately one week of work in the last month to train on the job and fill the position.

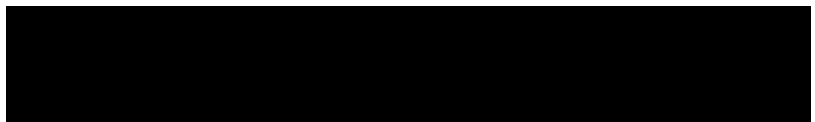
Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors.

Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has consented to this enlargement of time.

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

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 6 November 2025.

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES'
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Airman (E-2))	Before Panel No. 3
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	No. ACM 40684
<i>Appellant.</i>)	
)	10 November 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 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 over 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 450 days in length. Appellant's over 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 more than two thirds of the 18 month standard for this Court to issue a decision, which only leaves about 3 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 at this late stage in the process.

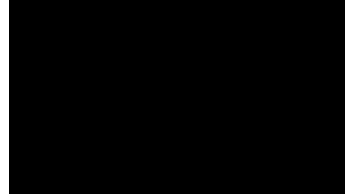
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



KATE E. LEE, Maj, USAF
Appellate Government Counsel
Government Trial & Appellate Operations
1500 W. Perimeter Road, Suite 1190
Joint Base Andrews, MD
DSN: 612-4804

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 10 November 2025.



KATE E. LEE, Maj, USAF
Appellate Government Counsel
Government Trial & Appellate Operations
1500 W. Perimeter Road, Suite 1190
Joint Base Andrews, MD
DSN: 612-4804

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	APPELLANT’S MOTION FOR
<i>Appellee,</i>)	ENLARGEMENT OF TIME
)	(THIRTEENTH)
)	
v.)	Before Panel 3
)	
Airman (E-2))	No. ACM 40684
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	3 December 2025
<i>Appellant.</i>)	

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

Pursuant to Rule 23.3(m)(4) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his thirteenth enlargement of time to file an Assignment of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **13 January 2026**. This case was docketed with this Court on 20 September 2024. From the date of docketing to the present date, 440 days have elapsed. On the date requested, 480 days will have elapsed.

On 20 March 2024 and 25-29 March 2025, R. at 1, 75, 744, Appellant was tried by a general court-martial comprised of officer and enlisted members. R. at 15. Contrary to his pleas, R. at 18, Appellant was found guilty of one charge and two specifications of obstruction of justice, in violation of Article 82, Uniform Code of Military Justice (UCMJ), and one charge and specification of providing false information to law enforcement officers, in violation of Article 131, UCMJ. R. at 672-73. The military judge sentenced Appellant to a reduction to E-1, total forfeitures, a bad-conduct discharge, and confinement for 12 months. R. at 743. The convening authority took no action with respect to the findings or sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action. Appellant is not confined.

The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Undersigned counsel is assigned 25 cases, 11 cases are pending initial AOE's before this Court. No case before the Supreme Court takes priority over this case. However, one case before the Court of Appeals for the Armed Forces (CAAF) takes priority over this case: *United States v. Barlow*. In that case, the appellant sought a grant of review or, in the alternative, a remand to this Court based on newly discovered evidence. The CAAF denied both requests. That appellant intends to move to reconsider the CAAF's decision as well as file a petition for a new trial. Both of these will be filed on or around 12 December 2025.

In addition, the following cases before this Court take priority over the instant case:

- 1) *United States v. Lawrence*, ACM 40655 – The record of trial is two volumes, consisting of 13 prosecution exhibits, 10 defense exhibits, and five appellate exhibits. The transcript is 126 pages long. Undersigned counsel has completed a review of the record, identified several errors, and has begun drafting. However, drafting has not been completed due to undersigned counsel's higher priority items, including three Supreme Court cases and *Barlow*.
- 2) *United States v. Hon*, ACM 40671 – The record of trial is six volumes long consisting of 14 prosecution exhibits, seven defense exhibits, 28 appellate exhibits, and one court exhibit. The transcript is 483 pages long. Undersigned counsel has not begun a review of this record.
- 3) *United States v. Turner*, ACM 24067 – The record of trial is six volumes long, consisting of three prosecution exhibits, and 27 appellate exhibits. The transcript is 118 pages. Undersigned counsel has not begun a review of this record.

In addition to these cases, undersigned counsel will be serving as the backfill director of staff for the Military Justice and Discipline Directorate from 26 December 2025 until 2 January 2026.

On 22 November 2024, this Court ordered that “enlargements of time that, if granted, would expire more than 360 days after docketing, will not be granted absent exceptional circumstances.” The exceptional circumstances in this case are: (1) the number of cases older than Appellant’s on undersigned counsel’s docket; (2) the number of cases on undersigned counsel’s docket before the CAAF and the Supreme Court of the United States; and (3) the staffing shortages at the Appellate Defense Division coupled with a severe increase in workload.

As noted in *United States v. May*, 47 M.J. 478, 481 (C.A.A.F. 1998), there is no substitute for the briefing by appellate defense counsel on behalf of an individual appellant, even considering this Court’s broad mandate for independent review. Appellant requested representation under Article 70, UCMJ, when he elected to appeal. Undersigned counsel’s limited progress so far is not due to an unwillingness to familiarize himself with the case or file a brief raising substantive issues, nor is it a deliberate tactical decision in order to create an appellate issue. *See United States v. Roach*, 66 M.J. 410, 418 (C.A.A.F. 2008).

Undersigned counsel regularly examines his docket with supervisory counsel to assess the possibility of assigning substitute counsel to expedite review of Appellant’s case. However, no such substitute counsel has been identified due to the Appellate Defense Division’s workload. For a more detailed accounting of the staffing shortages at the Appellate Defense Division, our dramatically increased workload, and the attempts to mitigate these problems, please see the attached appendix. *See generally* Mot. to Attch., App’x A.

Counsel simply cannot work faster without sacrificing his competent representation, which he owes to his clients. For example, in *United States v. Gibbs*, this Court thought it appropriate to deny an enlargement of time when assigned appellate counsel had not begun a review of the record. No. ACM 40523, slip op. at 21 (A.F. Ct. Crim. App. May 20, 2025). As this Court noted, its denial of that enlargement resulted in subpar representation. *See id.* at 23 n.10 (acknowledging that this Court identified an error that assigned appellate defense counsel failed to identify). As in *Gibbs*, this Court cannot deny this enlargement without sacrificing Appellant's right to effective representation.

This Court has authority to ask the Judge Advocate General to provide the appellate defense division with additional manning. *Roach*, 66 M.J. at 418. It has failed to do so, despite this division's repeated requests. Instead, it has denied enlargements of time resulting in deficient performance of counsel. *See Gibbs*, slip. op. at 21. This Court should not deprive appellants of their constitutional right to counsel who, due to no fault of their own, have had their appeals substantially delayed by the Government's failure to adequately staff this division. This Court can and should request additional personnel be assigned before ever considering denying an EOT.

In addition to the above, the undersigned was also selected to serve as the backfill director of staff for the military justice and discipline directorate. This has required approximately one week of work in the last month to train on the job and fill the position.

Through no fault of Appellant, undersigned counsel has been unable to complete his review and prepare a brief of Appellant's case. This is because undersigned counsel has been completing higher priority tasks on other cases he is assigned. Since the last motion for EOT, undersigned counsel completed the following: (1) drafting and filing a Supreme Court petition in *United States v. Beyer*; (2) drafting and filing a Supreme Court petition in *United States v. Covitz*;

(3) drafting a Supreme Court petition in the consolidated cases of *United States v. Pulley* and *United States v. Folts*; (4) reviewing five draft filings in other cases, amounting to 136 pages reviewed; and (5) attending moot arguments for cases with oral argument at the CAAF.

In its order granting Appellant's Motion for EOT (Twelfth), this Court noted that "it would be hesitant to grant further requests for extensions of time and if granted additional extensions may be granted in part." Should this Court deny this enlargement in full or in part, undersigned counsel will be unable to review this case and brief it in the time allotted. Three cases before this Court and one case before the CAAF takes priority. Requiring undersigned counsel to complete a brief in one case before this Court, petition the CAAF for reconsideration and for a new trial in another case, and review and prepare briefs in two other cases before this Court is *impossible*. *See supra* (discussing effective assistance of counsel). Adding to that timeline a review of Appellant's record and preparing a brief in his case compounds the concerns of ineffective assistance of counsel.

The impossibility of such a task should be self-evident. But it is worth noting that it is not the result of undersigned counsel's laziness or inefficiency. Undersigned counsel routinely works approximately eighty hours a week, including weekends, holidays, and evenings. In fact, undersigned counsel worked every day of the Thanksgiving holiday, despite being on leave. Further, undersigned counsel is, by the numbers, one of the most efficient attorneys in the Appellate Defense Division. Time management is decidedly not the problem—the workload and lack of manning at the Appellate Defense Division is.

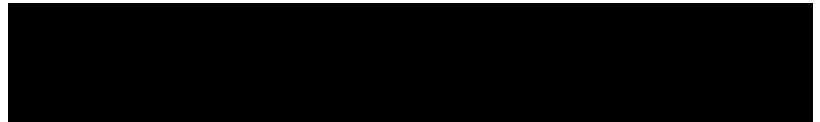
Because completing a review of this case and briefing of it would be impossible, denial of this enlargement would be tantamount to denying Appellant his statutory and constitutional right to counsel. Such a denial would, further, violate binding precedent on this Court, should this Court decide Appellant's case without briefing from him.

An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has consented to this enlargement of time.

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

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division
United States Air Force
(240) 612-2807

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 Government Trial and Appellate Operations Division on 3 December 2025.

Respectfully submitted,



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Appellate Defense Counsel
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IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

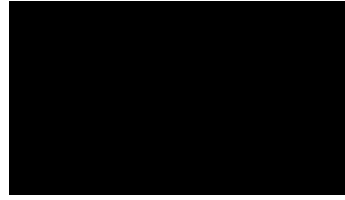
UNITED STATES,)	UNITED STATES'
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Airman (E-2))	Before Panel No. 3
JUAN E. PARRA-PERALTA,)	
United States Air Force,)	No. ACM 40684
<i>Appellant.</i>)	
)	5 December 2025
)	

**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 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 over 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 480 days in length. Appellant's over 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 more than two thirds of the 18 month standard for this Court to issue a decision, which only leaves about 2 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.

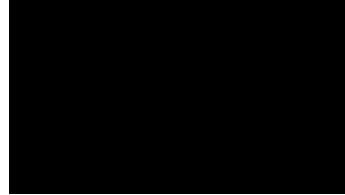
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



KATE E. LEE, Maj, USAF
Appellate Government Counsel
Government Trial & Appellate Operations
1500 W. Perimeter Road, Suite 1190
Joint Base Andrews, MD
DSN: 612-4804

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 5 December 2025.



KATE E. LEE, Maj, USAF
Appellate Government Counsel
Government Trial & Appellate Operations
1500 W. Perimeter Road, Suite 1190
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DSN: 612-4804

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

UNITED STATES)	No. ACM 40684
<i>Appellee</i>)	
)	
v.)	
)	ORDER
JUAN E. PARRA PERALTA)	
Airman (E-2))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 3

On 3 December 2025, counsel for Appellant submitted a Motion for Enlargement of Time (Thirteenth) requesting an additional 30 days to submit Appellant’s assignments of error. On the date requested, 13 January 2026, 480 days will have passed since Appellant’s case was docketed with this court.

On 9 December 2025, the court held a status conference to discuss this thirteenth request for an enlargement of time. Appellant was represented by Major Trevor N. Ward; Mr. Dwight H. Sullivan from the Appellate Defense Division was also present. Major Kate E. Lee represented the Government. Appellant’s counsel informed the court he had not begun reviewing the record of trial in the case and confirmed that he made Appellant aware of that fact before Appellant consented to the current request for an enlargement of time.

During this status conference the court made clear this case is a higher priority than two other docketed cases—No. ACM 40665 and No. ACM 24067—currently assigned to Appellant’s counsel. The court anticipates seeing a brief filed in the above-captioned case before any assignments of error briefs are filed in these two cases. However, we anticipate Appellant’s counsel filing a brief in another case—No. ACM 40671—before 24 December 2025 and then turning his focus on this case. We also discussed how additional taskings, to include being selected to temporarily backfill the Director of Staff role for the Air Force Military Justice and Discipline Directorate (AF/JAJ), does not constitute good cause for further delay. Diligent advocacy for individual clients remains the primary responsibility of all appellate defense counsel. Additional duties should not interfere with that responsibility.

This was the third status conference in this case. In our status conferences and through our orders we emphasized the need to file any assignments of error in this case and requested that the Appellate Defense Division explore all options to include detailing reservists or other counsel to take on this case or

other cases Appellant’s counsel is assigned. The Government has continued to maintain its opposition to further enlargements of time.

The United States Court of Appeals for the Armed Forces stated its “decisions . . . reflect [their] understanding that the Courts of Criminal Appeals have broad powers to issue orders to counsel to ensure the timely progress of cases reviewed under Article 66.” *United States v. Roach*, 66 M.J. 410, 418 (C.A.A.F. 2008). Additionally, we note we are required to “ensure that Appellant understands the available options,” *id.*, and will require Appellant’s counsel to notify Appellant of the deadline set in this order and the fact that we do not anticipate granting further extensions of time.

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 10th day of December, 2025,

ORDERED:

Appellant’s Motion for an Enlargement of Time to File a Brief is **GRANTED**. Counsel for Appellant shall file any assignments of error not later than **13 January 2026**.

It is further ordered:

Appellate Counsel will notify Appellant of the date the brief is due and the fact that this court does not anticipate granting any further extensions of time.



FOR THE COURT



JACOB B. HOEFERKAMP, Capt, USAF
Chief Commissioner

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

UNITED STATES)	No. ACM 40684
<i>Appellee</i>)	
)	
v.)	
)	NOTICE OF PANEL
Juan E. PARRA PERALTA)	CHANGE
Airman (E-2))	
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 3 and referred to Panel 2 for appellate review.

This panel letter supersedes all previous panel assignments.



Chief Commissioner

The ROT is eight volumes consisting of 13 prosecution exhibits, 13 defense exhibit, and 67 appellate exhibits, and one court exhibit. The transcript is 744 pages long.

Undersigned counsel is assigned 25 cases, 11 cases are pending initial AOE's before this Court. No case before any court takes priority over this case.

On 22 November 2024, this Court ordered that "enlargements of time that, if granted, would expire more than 360 days after docketing, will not be granted absent exceptional circumstances." The exceptional circumstances in this case have been previously articulated in prior motions for enlargement of time. However, in addition, Appellant offers the following: late last week, Appellant decided to withdraw from appellate review. Undersigned counsel worked diligently to complete the necessary paperwork to effectuate this withdrawal. However, due to the weekend and communication difficulties with the Appellant, undersigned counsel has not yet received the necessary paperwork. Additional time is necessary to obtain this paperwork and file the motion to withdraw.

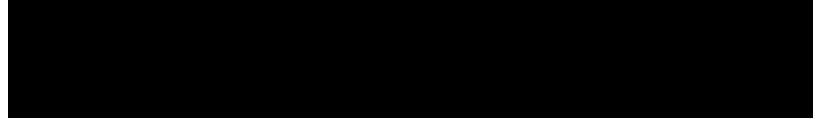
Further, there is good cause to grant this motion out of time. Undersigned counsel worked diligently to complete the requisite paperwork, to include over the weekend. Counsel believed that the paperwork could be completed by tomorrow, the original deadline for the AOE. But, despite counsel's best efforts, additional time is needed to complete the paperwork.

An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Additionally:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has consented to this enlargement of time.

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

Respectfully submitted,



TREVOR N. WARD, Maj, USAF
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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 Government Trial and Appellate Operations Division on 12 January 2026.

Respectfully submitted,



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