

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	NOTICE OF DIRECT APPEAL
<i>Appellee,</i>)	PURSUANT TO ARTICLE
)	66(b)(1)(A), UCMJ
v.)	
)	
)	
Technical Sergeant (E-6),)	No. ACM XXXXXX
Jaime R. Quinones-Reyes,)	
United States Air Force,)	10 June 2024
<i>Appellant.</i>)	

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

On 30 August 2023, a general court-martial convened at Joint Base McGuire-Dix-Lakerhurst, New Jersey, convicted Technical Sergeant (TSgt) Jaime R. Quinones-Reyes, consistent with his pleas, of one charge and two specifications of domestic violence in violation of Article 128, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 928; and one charge and specification of obstruction of justice in violation of Article 131, UCMJ, 10 U.S.C. § 931. (R. at 129) The military judge sentenced TSgt Quinones-Reyes to 90 days of confinement and to reduction to the pay-grade of E-5. (Record of Trial (ROT) Vol. 1, Entry of Judgment, dated 17 October 2023; R. at 198.)

On 13 March 2024, the Government purportedly sent TSgt Quinones-Reyes the required notice by mail of his right to appeal within 90 days. Pursuant Article 66(b)(1)(A), UCMJ, TSgt Quinones-Reyes files his notice of direct appeal with this Court.

Respectfully submitted,

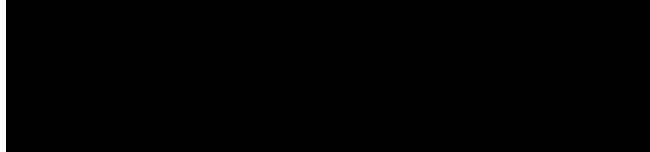


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CERTIFICATE OF FILING AND SERVICE

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 10 June 2024.

Respectfully submitted,



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

UNITED STATES)	No. ACM _____
<i>Appellee</i>)	
)	
v.)	
)	NOTICE OF
Jaime R. QUINONES-REYES)	DOCKETING
Technical Sergeant (E-6))	
U.S. Air Force)	
<i>Appellant</i>)	

On 10 June 2024, this court received a notice of direct appeal from Appellant in the above-styled case, pursuant to Article 66(b)(1)(A), Uniform Code of Military Justice, 10 U.S.C. § 866(b)(1)(A).


As of the date of this notice, the court has not yet received a record of trial in Appellant's case.

Accordingly, it is by the court on this 10th day of June, 2024,
ORDERED:

The case in the above-styled matter is referred to Panel 3.
It is further ordered:

The Government will forward a copy of the record of trial to the court forthwith.



FOR THE COURT

TANICA S. BAGMON
Appellate Court Paralegal

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

UNITED STATES)	No. ACM 40636
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Jaime QUINONES-REYES)	
Technical Sergeant (E-6))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 3

On 27 August 2024, counsel for Appellant submitted a Motion for Enlargement of Time, Out of Time (First) requesting an additional 57 days to submit Appellant's assignments of error. The Government opposes the motion.

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

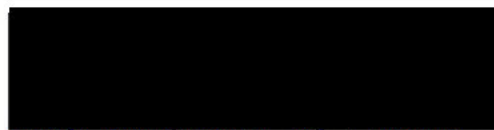
Accordingly, it is by the court on this 5th day of September, 2024,

ORDERED:

Appellant's Motion for Enlargement of Time, Out of Time (First) is **GRANTED**. Appellant shall file any assignments of error not later than **23 October 2024**.

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

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*.



OLGA STANFORD, Capt, USAF
Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME, OUT OF TIME (FIRST)
)	
v.)	Before Panel 3
)	
Technical Sergeant (E-6),)	No. ACM 40636
JAIME QUINONES-REYES,)	
United States Air Force,)	27 August 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) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his first enlargement of time to file an Assignment of Errors (AOE). Appellant requests an enlargement for a period of 57 days, which will end on 23 October 2024. This case was docketed with this Court on 10 June 2024. This Court appears to have acknowledged receipt of the record of trial on 25 June 2024. From the date of that receipt to the present date, 63 days have elapsed. On the date requested 120 days will have elapsed.

Good cause exists to file this motion out of time. On 25 June 2024, the Air Force Appellate Defense Division (“Division”) office signed for receipt of the complete Record of Trial and the Notice of Right to Submit Direct Appeal after transmittal by AFLOA/JAJM. This receipt also provided notice of the assigned ACM number. The receipt signed by the Division did not indicate whether the record of trial had been referred to this Court. The Division received no other notice to indicate that the record of trial had been docketed with this Court, despite the rule that “AFLOA/JAJM shall notify the Court, AFLOA/JAJA, and AFLOA/JAJG of the receipt of docketing of cases.” A.F. CT. CRIM. APP. R. 3.2(d). This lack of notice prevented undersigned counsel from being aware that the record of trial had been filed with this Court so as to trigger the timing requirements of this Court’s rules. A.F. CT. CRIM. APP. R. 18(d) (“Any brief for an accused shall be filed within 60 days after appellate counsel has been notified that the Judge Advocate General has referred the record to the Court.”) Moreover, this Court’s online docket did not list an ACM

number for this case until 27 August 2024. (Appendix.) Counsel remained unaware that the record of trial had been received by this Court until 27 August 2024, thus preventing the timely submission of a request for enlargement of time.

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

Respectfully submitted,

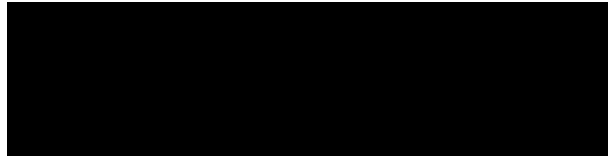
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CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 27 August 2024.

Respectfully submitted,



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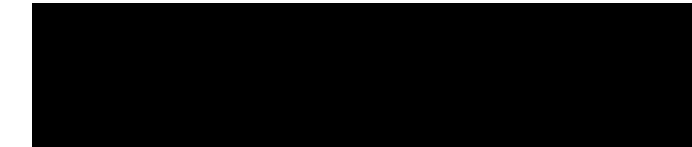
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' OPPOSITION
<i>Appellee,</i>)	TO APPELLANT'S MOTION
)	FOR ENLARGEMENT OF TIME -
v.)	OUT OF TIME
)	
Technical Sergeant (E-6))	ACM 40636
JAIME QUINONES-REYES, USAF,)	
<i>Appellant.</i>)	Panel No. 3
)	

**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.

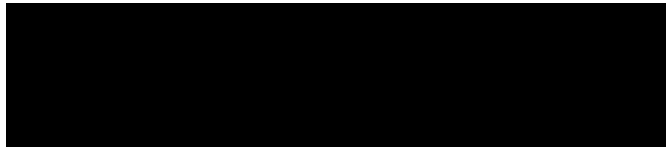
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



JENNY A. LIABENOW, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
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(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 29 August 2024.



JENNY A. LIABENOW, Lt Col, USAF
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IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME, OUT OF TIME (SECOND)
)	
v.)	Before Panel 3
)	
Technical Sergeant (E-6),)	No. ACM 40636
JAIME QUINONES-REYES,)	
United States Air Force,)	28 October 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) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his second enlargement of time to file an Assignment of Errors (AOE). Appellant requests an enlargement for a period of 25 days, which will end on **22 November 2024**. This case was docketed with this Court on 10 June 2024. This Court appears to have acknowledged receipt of the record of trial on 25 June 2024. From the date of that receipt to the present date, 125 days have elapsed. On the date requested 150 days will have elapsed.

On 30 August 2023, a general court-martial convened at Joint Base McGuire-Dix-Lakerhurst, New Jersey, convicted Technical Sergeant (TSgt) Jaime R. Quinones-Reyes, consistent with his pleas, of one charge and two specifications of domestic violence in violation of Article 128, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 928; and one charge and specification of obstruction of justice in violation of Article 131, UCMJ, 10 U.S.C. § 931. (R. at 129) The military judge sentenced Appellant to 90 days of confinement and to reduction to the pay-grade of E-5. (Record of Trial (ROT) Vol. 1, Entry of Judgment, dated 17 October 2023; R. at 198.) The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action.)

The record of trial consists of seven volumes with a 199-page transcript. There are four prosecutions exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. Appellant is not currently in confinement. Appellant has been advised of his right to timely appellate review, as

well as the request for an enlargement of time. Appellant has agreed to the request for an enlargement of time. Additionally, undersigned counsel has updated Appellant on the status of the case. Counsel asserts attorney-client privilege regarding the substance of those communications.

Undersigned counsel is currently assigned 20 cases; 11 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

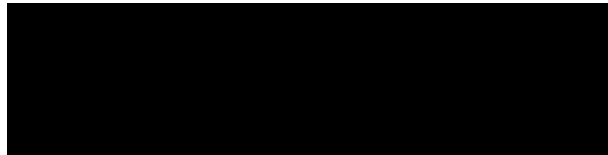
- 1) *United States v. Hilton*, ACM 40500 – The record of trial consists of 15 volumes. The transcript is 2747 pages. There are 29 prosecution exhibits, 22 defense exhibits, two court exhibits, and 102 appellate exhibits. This case is on its thirteenth enlargement of time. Counsel has completed reviewing the record of trial and has begun drafting and assignment of errors.
- 2) *United States v. Jenkins*, ACM S32765 – The record of trial consists of three volumes stored in electronic format. The transcript is 138 pages. There are four prosecution exhibits, one defense exhibit, four appellate exhibits, and one court exhibit. This case is on its eighth enlargement of time.
- 3) *United States v. Titus*, ACM 40557 - The record of trial consists of four volumes. The transcript is 142 pages. There are five prosecution exhibits, five defense exhibits, 31 appellate exhibits, and five court exhibits. This case is on its seventh enlargement of time.

Through no fault of appellant, counsel has been working on other assigned matters and has yet to complete his review of Appellant's case. Good cause exists to file this request for enlargement out of time because the case was erroneously omitted from counsel's individual case tracker. Counsel is immediately filing this request upon discovering the error. Additionally, counsel has been work-saturated over the past thirty days. Counsel was busy preparing for oral arguments before the Court of Appeals for the Armed Forces (CAAF) in *United States v. Saul*, ACM 40341. Additionally, counsel submitted assignments of error to this Court in both *United States v. Martinez* and *United States v. Cepeda*. Finally, counsel submitted a supplement to petition for review to the CAAF in *United States v. Schneider*. Since completion of these, Counsel has been working through pending deadlines before the CAAF for *United States v. Bates* and *United States v. Vargo*, while attempting to take leave between 30 October 2024 and 5 November 2024. Accordingly, an enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and

advise Appellant regarding potential errors.

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

Respectfully submitted,

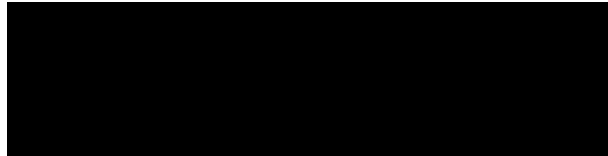


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CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 28 October 2024.

Respectfully submitted,



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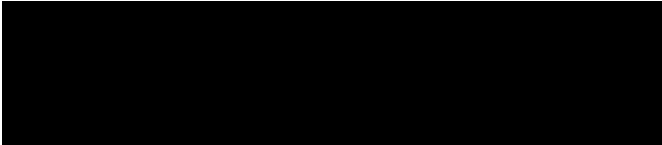
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
)	OPPOSITION
<i>Appellee,</i>)	TO APPELLANT'S MOTION
)	FOR ENLARGEMENT OF TIME -
v.)	OUT OF TIME
)	
Technical Sergeant (E-6))	ACM 40636
JAIME QUINONES-REYES, USAF,)	
<i>Appellant.</i>)	Panel No. 3
)	

**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, Out of Time, to file an Assignment of Error in this case.

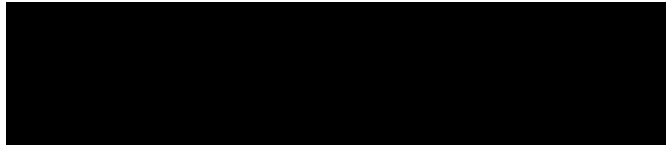
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



JENNY A. LIABENOW, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force
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CERTIFICATE OF FILING AND SERVICE

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

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME, OUT OF TIME (THIRD)
)	
v.)	Before Panel 3
)	
Technical Sergeant (E-6),)	No. ACM 40636
JAIME QUINONES-REYES,)	
United States Air Force,)	18 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) and (4) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his third enlargement of time to file an Assignment of Errors (AOE).¹ Appellant requests an enlargement for a period of 30 days, which will end on **22 December 2024**. This case was docketed with this Court on 10 June 2024. This Court appears to have acknowledged receipt of the record of trial on 25 June 2024. From the date of that receipt to the present date, 146 days have elapsed. On the date requested 180 days will have elapsed.

On 30 August 2023, a general court-martial convened at Joint Base McGuire-Dix-Lakerhurst, New Jersey, convicted Technical Sergeant (TSgt) Jaime R. Quinones-Reyes, consistent with his pleas, of one charge and two specifications of domestic violence in violation of Article 128, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 928; and one charge and specification of obstruction of justice in violation of Article 131, UCMJ, 10 U.S.C. § 931. (R. at 129) The military judge sentenced Appellant to 90 days of confinement and to reduction to the pay-grade of E-5. (Record of Trial (ROT) Vol. 1, Entry of Judgment, dated 17 October 2023; R. at 198.) The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action.)

¹ Counsel originally submitted a timely motion for enlargement of time in this case on 15 November 2024. However, this submission has scrivener’s error in the date listed in the case caption. Counsel respectfully withdraws that motion and submits this one instead. Good cause exists to file this motion out of time because counsel submitted the original motion on time.

The record of trial consists of seven volumes with a 199-page transcript. There are four prosecutions exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. Appellant is not currently in confinement. Appellant has been advised of his right to timely appellate review, as well as the request for an enlargement of time. Appellant has agreed to the request for an enlargement of time. Additionally, counsel has been in communication with Appellant concerning the status of the case, but does not have a substantive update at this time. Counsel asserts attorney-client privilege regarding the substance of those communications.

Undersigned counsel is currently assigned 20 cases; 11 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

- 1) *United States v. Hilton*, ACM 40500 – The record of trial consists of 15 volumes. The transcript is 2747 pages. There are 29 prosecution exhibits, 22 defense exhibits, two court exhibits, and 102 appellate exhibits. This case is on its thirteenth enlargement of time. Counsel has completed reviewing the record of trial and has begun drafting and assignment of errors.
- 2) *United States v. Jenkins*, ACM S32765 – The record of trial consists of three volumes stored in electronic format. The transcript is 138 pages. There are four prosecution exhibits, one defense exhibit, four appellate exhibits, and one court exhibit. This case is on its ninth enlargement of time.
- 3) *United States v. Titus*, ACM 40557 - The record of trial consists of four volumes. The transcript is 142 pages. There are five prosecution exhibits, five defense exhibits, 31 appellate exhibits, and five court exhibits. This case is on its eighth enlargement of time.

Through no fault of appellant, counsel has been working on other assigned matters and has yet to complete his review of Appellant's case. Accordingly, an enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors.

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

Respectfully submitted,

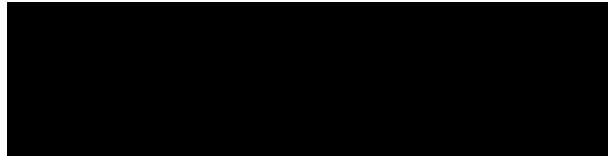


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CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 18 November 2024.

Respectfully submitted,



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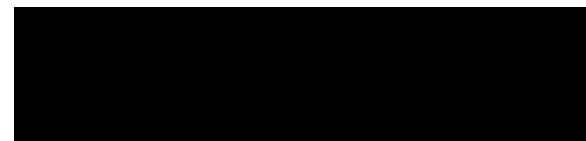
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
)	OPPOSITION TO APPELLANT'S
<i>Appellee,</i>)	MOTION FOR ENLARGEMENT
)	OF TIME – OUT OF TIME
v.)	
)	
Technical Sergeant (E-6))	ACM 40636
JAIME QUINONES-REYES, USAF,)	
<i>Appellant.</i>)	Panel No. 3
)	

**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, Out 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.



MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
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 19 November 2024.



MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force
(240) 612-4800

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME, OUT OF TIME (FOURTH)
)	
v.)	Before Panel 3
)	
Technical Sergeant (E-6),)	No. ACM 40636
JAIME QUINONES-REYES,)	
United States Air Force,)	15 December 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) 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 Errors (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **21 January 2025**. This case was docketed with this Court on 10 June 2024.¹ This Court appears to have acknowledged receipt of the record of trial on 25 June 2024. From the date of that receipt to the present date, 173 days have elapsed. On the date requested 210 days will have elapsed since the date of receipt.

On 30 August 2023, a general court-martial convened at Joint Base McGuire-Dix-Lakerhurst, New Jersey, convicted Technical Sergeant (TSgt) Jaime R. Quinones-Reyes, consistent with his pleas, of one charge and two specifications of domestic violence in violation of Article 128, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 928; and one charge and specification of obstruction of justice in violation of Article 131, UCMJ, 10 U.S.C. § 931. (R. at 129) The military judge sentenced Appellant to 90 days of confinement and to reduction to the pay-grade of E-5. (Record of Trial (ROT) Vol. 1, Entry of Judgment, dated 17 October 2023; R. at 198.) The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action.)

The record of trial consists of seven volumes with a 199-page transcript. There are four

¹ From the date of docketing to the present date, 188 days have elapsed. On the date requested, 225 days will have elapsed since docketing.

prosecutions exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. Appellant is not currently in confinement. Appellant has been advised of his right to timely appellate review, as well as the request for an enlargement of time. Appellant has agreed to the request for an enlargement of time. Additionally, counsel has been in communication with Appellant concerning the status of the case, but does not have a substantive update at this time. Counsel asserts attorney-client privilege regarding the substance of those communications.

Undersigned counsel is currently assigned 20 cases; 11 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

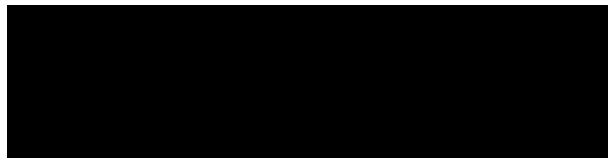
- 1) *United States v. Hilton*, ACM 40500 – The record of trial consists of 15 volumes. The transcript is 2747 pages. There are 29 prosecution exhibits, 22 defense exhibits, two court exhibits, and 102 appellate exhibits. This case is on its fourteenth enlargement of time. Counsel has been working an assignment of errors with civilian counsel.
- 2) *United States v. Titus*, ACM 40557 - The record of trial consists of four volumes. The transcript is 142 pages. There are five prosecution exhibits, five defense exhibits, 31 appellate exhibits, and five court exhibits. This case is on its ninth enlargement of time.
- 3) *United States v. Rodriguez*, ACM 40565 - The record of trial consists of two volumes. The transcript is 86 pages. There are two prosecution exhibits, six defense exhibits, and five appellate exhibits. This case is on its eighth enlargement of time.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete an in-depth review of the record of trial. Counsel was occupied with the completion of an assignment of errors for *United States v. Jenkins*, which counsel worked on through the Thanksgiving weekend and submitted to this Court on 12 December 2024. Additionally, counsel has been working with civilian counsel in *United States v. Hilton*, which required him to dedicate time to coordinate the transmission of sealed exhibits. Counsel has had to balance his work before this Court with other priorities before the Court of Appeals for the Armed Forces (CAAF). On 13 November 2024, counsel submitted a supplement for petition for review to the CAAF in

United States v. Bates. This supplement addressed five issues. Additionally, counsel submitted a supplement for petition for review and a response to motion to dismiss to the CAAF in *United States v. Vargo* on 20 November 2024. Counsel worked through the weekend on 16 November 2024 in order to comply with the deadline set by the CAAF, while tending to a lingering illness that required him to go home from the office on multiple days. Additionally, counsel was on leave between 30 October 2024 and 5 November 2024. These circumstances and priorities have prevented counsel from being able to dedicate the time necessary for this case beyond a preliminary review. Accordingly, an enlargement of time is necessary to allow undersigned counsel to complete his review of the case and advise Appellant on potential errors.

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

Respectfully submitted,

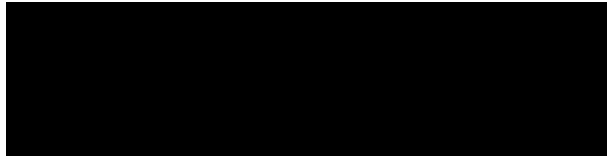
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CERTIFICATE OF FILING AND SERVICE

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 15 December 2024.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF
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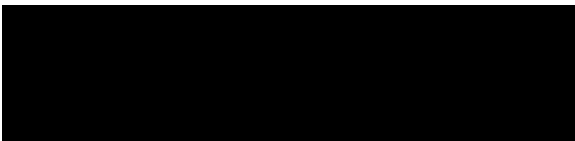
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
)	OPPOSITION TO APPELLANT'S
<i>Appellee,</i>)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Technical Sergeant (E-6))	ACM 40636
JAIME QUINONES-REYES, USAF,)	
<i>Appellant.</i>)	Panel No. 3
)	

**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.



MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
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 16 December 2024.



MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force
(240) 612-4800

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME, OUT OF TIME (FIFTH)
)	
v.)	Before Panel 3
)	
Technical Sergeant (E-6),)	No. ACM 40636
JAIME QUINONES-REYES,)	
United States Air Force,)	14 January 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) 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 Errors (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **20 February 2025**. This case was docketed with this Court on 10 June 2024.¹ This Court appears to have acknowledged receipt of the record of trial with the verbatim transcript on 25 June 2024. From the date of that receipt to the present date, 203 days have elapsed. On the date requested 240 days will have elapsed since the date of receipt.

On 30 August 2023, a general court-martial convened at Joint Base McGuire-Dix-Lakerhurst, New Jersey, convicted Technical Sergeant (TSgt) Jaime R. Quinones-Reyes, consistent with his pleas, of one charge and two specifications of domestic violence in violation of Article 128, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 928; and one charge and specification of obstruction of justice in violation of Article 131, UCMJ, 10 U.S.C. § 931. (R. at 129) The military judge sentenced Appellant to 90 days of confinement and to reduction to the pay-grade of E-5. (Record of Trial (ROT) Vol. 1, Entry of Judgment, dated 17 October 2023; R. at 198.) The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action.)

¹ From the date of docketing to the present date, 218 days have elapsed. On the date requested, 255 days will have elapsed since docketing.

The record of trial consists of seven volumes with a 199-page transcript. There are four prosecutions exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. Appellant is not currently in confinement. Appellant has been advised of his right to timely appellate review, as well as the request for an enlargement of time. Appellant has agreed to the request for an enlargement of time. Additionally, counsel has been in communication with Appellant concerning the status of the case, but does not have a substantive update at this time. Counsel asserts attorney-client privilege regarding the substance of those communications.

Undersigned counsel is currently assigned 20 cases; 10 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

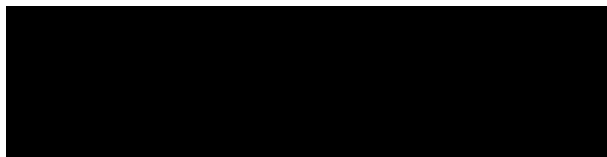
- 1) *United States v. Rodriguez*, ACM 40565 – The record of trial consists of two volumes. The transcript is 86 pages. There are two prosecution exhibits, six defense exhibits, and five appellate exhibits. This case is on its ninth enlargement of time.
- 2) *United States v. Sanger*, ACM S32773 – The record of trial consists of two electronic volumes. The transcript is 141 pages. There are four prosecution exhibits, one defense exhibit, and four appellate exhibits. This case is on its eighth enlargement of time.
- 3) *United States v. Licea*, ACM 40602 - The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are 12 prosecution exhibits, five defense exhibits, 22 appellate exhibits, and one court exhibit. This case is on its seventh enlargement of time.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters which has prevented him from completing an in-depth review of the record of trial. Counsel was occupied with the completion of an assignment of errors for *United States v. Jenkins*, which counsel worked on through the Thanksgiving weekend and submitted to this Court on 12 December 2024. Additionally, counsel worked through his leave over the Christmas holiday to complete work on an assignment of errors for *United States v. Hilton*, which was submitted to this Court on 27 December 2024. Counsel was also occupied with the completion of a supplement for petition for

review for the Court of Appeals for the Armed Forces in *United States v. Scott* which was due on 7 January 2025, which counsel worked on through the New Year holiday. Accordingly, an enlargement of time is necessary for counsel to continue reviewing the record of trial and to advise appellant on potential errors.

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

Respectfully submitted,

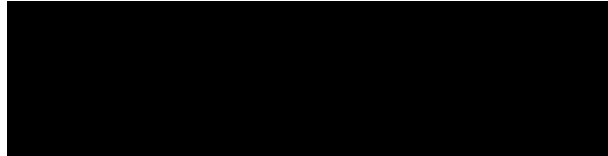


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CERTIFICATE OF FILING AND SERVICE

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 14 January 2025.

Respectfully submitted,



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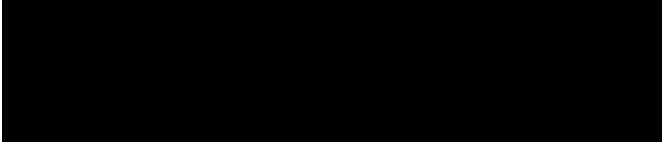
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
)	OPPOSITION TO APPELLANT'S
<i>Appellee,</i>)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Technical Sergeant (E-6))	ACM 40636
JAIME QUINONES-REYES, USAF,)	
<i>Appellant.</i>)	Panel No. 3
)	

**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.

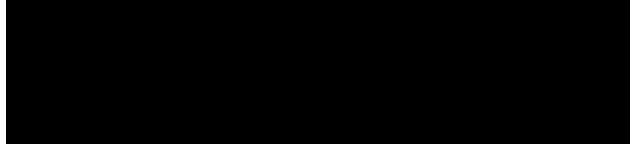
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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 16 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

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME (SIXTH)
)	
v.)	Before Panel 3
)	
Technical Sergeant (E-6),)	No. ACM 40636
JAIME QUINONES-REYES,)	
United States Air Force,)	13 February 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) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his sixth enlargement of time to file an Assignment of Errors (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **22 March 2025**. This case was docketed with this Court on 10 June 2024.¹ This Court appears to have acknowledged receipt of the record of trial with the verbatim transcript on 25 June 2024. From the date of that receipt to the present date, 233 days have elapsed. On the date requested 270 days will have elapsed since the date of receipt.

On 30 August 2023, a general court-martial convened at Joint Base McGuire-Dix-Lakerhurst, New Jersey, convicted Technical Sergeant (TSgt) Jaime R. Quinones-Reyes, consistent with his pleas, of one charge and two specifications of domestic violence in violation of Article 128, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 928; and one charge and specification of obstruction of justice in violation of Article 131, UCMJ, 10 U.S.C. § 931. (R. at 129) The military judge sentenced Appellant to 90 days of confinement and to reduction to the pay-grade of E-5. (Record of Trial (ROT) Vol. 1, Entry of Judgment, dated 17 October 2023; R. at 198.) The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action.)

¹ From the date of docketing to the present date, 248 days have elapsed. On the date requested, 285 days will have elapsed since docketing.

The record of trial consists of seven volumes with a 199-page transcript. There are four prosecutions exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. Appellant is not currently in confinement. Appellant has been advised of his right to timely appellate review, as well as the request for an enlargement of time. Appellant has agreed to the request for an enlargement of time. Additionally, counsel has been in communication with Appellant concerning the status of the case, but does not have a substantive update at this time. Counsel asserts attorney-client privilege regarding the substance of those communications.

Undersigned counsel is currently assigned 20 cases; 8 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

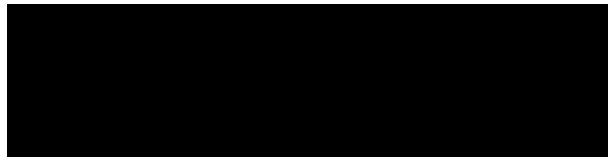
- 1) *United States v. Sanger*, ACM S32773 – The record of trial consists of two electronic volumes. The transcript is 141 pages. There are four prosecution exhibits, one defense exhibit, and four appellate exhibits. This case is on its ninth enlargement of time.
- 2) *United States v. Licea*, ACM 40602 - The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are 12 prosecution exhibits, five defense exhibits, 22 appellate exhibits, and one court exhibit. This case is on its seventh enlargement of time.
- 3) *United States v. Torres Gonzalez*, ACM 24001 – The record of trial consists of six volumes and a 608-page transcript. There are 46 prosecutions exhibits, eight defense exhibits, and 25 appellate exhibits. This case is on its eighth enlargement of time.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters which has prevented him from completing an in-depth review of the record of trial. Undersigned counsel has recently been detailed to *United States v. Cook*, a case which the C.A.A.F. granted for review on 29 January 2025. The grant brief and joint appendix are due for that case on 19 February 2025. Additionally, counsel has been hard at work on an Assignment of Errors in *United States v. Sanger*. That case has presented wide complexity, and counsel anticipates raising multiple errors before this Court. Counsel is also in preparations for oral argument before this Court in *United States v. Jenkins* which are taking place on 5 March 2025. These efforts have been strained

by medical issues that one of counsel's close family members has experienced which has required counsel to drive to the Walter Reed Medical Center two days a week for treatment during hours of operation. Accordingly, an enlargement of time is necessary for counsel to continue reviewing the record of trial and to advise appellant on potential errors.

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

Respectfully submitted,

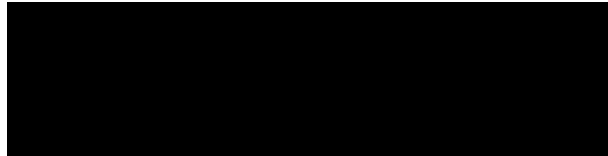
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MICHAEL J. BRUZYK, Capt, USAF
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CERTIFICATE OF FILING AND SERVICE

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 13 February 2025.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF
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Air Force Appellate Defense Division 1500 West
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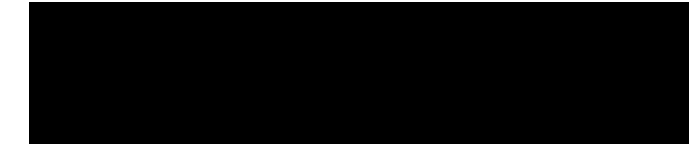
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
)	OPPOSITION TO APPELLANT'S
<i>Appellee,</i>)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Technical Sergeant (E-6))	ACM 40636
JAIME QUINONES-REYES, USAF,)	
<i>Appellant.</i>)	Panel No. 3
)	

**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.

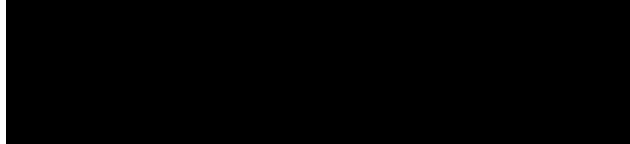
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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 18 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

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

UNITED STATES)	No. ACM 40636
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Jaime QUINONES-REYES)	
Technical Sergeant (E-6))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 3

Appellant’s case was docketed with the court on 10 June 2024. Thereafter, on 25 June 2024, Appellant and this court received the verbatim transcript for Appellant’s court-martial. The verbatim transcript is 199 pages, and the record of trial is composed of 7 volumes containing 4 prosecution exhibits, 19 defense exhibits, 25 appellate exhibits, and 1 court exhibit, in a guilty plea, judge alone, plea agreement case.

On 14 March 2025, counsel for Appellant submitted a Motion for Enlargement of Time (Seventh) requesting an additional 30 days to submit Appellant’s assignments of error. In the motion, Appellant’s counsel proffered that he “has been working on other assigned matters and has been unable to complete an in-depth review of the record of trial.” Appellant’s counsel further proffers that Appellant has been advised by his counsel of his case status, informed of this seventh enlargement of time request, and concurs with the request. The Government opposes the motion.

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

Accordingly, it is by the court on this 19th day of March, 2025,

ORDERED:

Appellant’s Motion for Enlargement of Time (Seventh) is **GRANTED**. Appellant shall file any assignments of error not later than **21 April 2025**.

Further requests by Appellant for enlargements of time will likely necessitate a status conference insofar as any future enlargements of time will involve

Appellant filing his assignment of errors brief more than 300 days after receiving the 199-page verbatim transcript of his court-martial.



FOR THE COURT



CAROL K. JOYCE
Clerk of Court

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME (SEVENTH)
)	
v.)	Before Panel 3
)	
Technical Sergeant (E-6),)	No. ACM 40636
JAIME QUINONES-REYES,)	
United States Air Force,)	14 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) 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 Errors (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **21 April 2025**. This case was docketed with this Court on 10 June 2024.¹ This Court appears to have acknowledged receipt of the record of trial with the verbatim transcript on 25 June 2024. From the date of that receipt to the present date, 262 days have elapsed. On the date requested 300 days will have elapsed since the date of receipt.

On 30 August 2023, a general court-martial convened at Joint Base McGuire-Dix-Lakerhurst, New Jersey, convicted Technical Sergeant (TSgt) Jaime R. Quinones-Reyes, consistent with his pleas, of one charge and two specifications of domestic violence in violation of Article 128, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 928; and one charge and specification of obstruction of justice in violation of Article 131, UCMJ, 10 U.S.C. § 931. (R. at 129) The military judge sentenced Appellant to 90 days of confinement and to reduction to the pay-grade of E-5. (Record of Trial (ROT) Vol. 1, Entry of Judgment, dated 17 October 2023; R. at 198.) The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action.)

¹ From the date of docketing to the present date, 277 days have elapsed. On the date requested, 315 days will have elapsed since docketing.

The record of trial consists of seven volumes with a 199-page transcript. There are four prosecutions exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. Appellant is not currently in confinement. Appellant has been advised of his right to timely appellate review, as well as the request for an enlargement of time. Appellant has agreed to the request for an enlargement of time. Additionally, counsel has been in communication with Appellant concerning the status of the case, but does not have a substantive update at this time. Counsel asserts attorney-client privilege regarding the substance of those communications.

Undersigned counsel is currently assigned 18 cases; 7 cases are pending initial AOE's before this Court. Undersigned military counsel's top priorities before this Court are as follows:

- 1) *United States v. Torres Gonzalez*, ACM 24001 – The record of trial consists of six volumes and a 608-page transcript. There are 46 prosecution exhibits, eight defense exhibits, and 25 appellate exhibits. This case is on its ninth enlargement of time
- 2) *United States v. Licea*, ACM 40602 – The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are twelve prosecution exhibits, five defense exhibits, twenty-two appellate exhibits, and one court exhibit. This case is on its ninth enlargement of time.
- 3) *United States v. Quinones Reyes*, ACM 40636 – This is the instant case.

Through no fault of appellant, undersigned counsel has been working on other assigned matters and has been unable to complete an in-depth review of the record of trial. During the previous enlargement of time, counsel was occupied with the completion of a grant brief before the Court of Appeals for the Armed Forces in *United States v. Cook*, which counsel submitted on 19 February 2025. Counsel also submitted a reply brief to this Court in *United States v. Hilton* on 24 February 2025 and an assignment of errors to this Court for *United States v. Sanger* on 28 February 2025. Additionally, counsel was in preparation for oral arguments before this Court in *United States v. Jenkins* which was scheduled to take place on 5 March 2025. Counsel submitted a supplemental brief in that case on 12 March 2025. These various priorities have prevented counsel from being

able to dedicate the time necessary to work on this case. Accordingly, an enlargement of time is necessary for counsel to fully review Appellant's case and advise on potential errors.

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

Respectfully submitted,

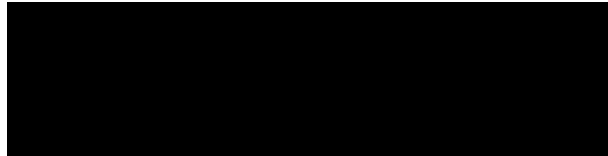


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CERTIFICATE OF FILING AND SERVICE

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 14 March 2025.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF
Appellate Defense Counsel
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IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES'
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT'S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 3
Technical Sergeant (E-6))	
JAMIE QUINONES-REYES,)	No. ACM 40636
United States Air Force.)	
<i>Appellant</i>)	18 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 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.

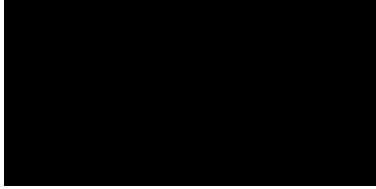
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



JOCELYN Q. WRIGHT, 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 18 March 2025.



JOCELYN Q. WRIGHT, 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 FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME (EIGHTH)
)	
v.)	Before Panel 3
)	
Technical Sergeant (E-6),)	No. ACM 40636
JAIME QUINONES-REYES,)	
United States Air Force,)	14 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) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his eighth enlargement of time to file an Assignment of Errors (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **21 May 2025**. This case was docketed with this Court on 10 June 2024.¹ This Court appears to have acknowledged receipt of the record of trial with the verbatim transcript on 25 June 2024. From the date of that receipt to the present date, 293 days have elapsed. On the date requested 330 days will have elapsed since the date of receipt.

On 30 August 2023, a general court-martial convened at Joint Base McGuire-Dix-Lakerhurst, New Jersey, convicted Technical Sergeant (TSgt) Jaime R. Quinones-Reyes, consistent with his pleas, of one charge and two specifications of domestic violence in violation of Article 128, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 928; and one charge and specification of obstruction of justice in violation of Article 131, UCMJ, 10 U.S.C. § 931. (R. at 129) The military judge sentenced Appellant to 90 days of confinement and to reduction to the pay-grade of E-5. (Record of Trial (ROT) Vol. 1, Entry of Judgment, dated 17 October 2023; R. at 198.) The

¹ From the date of docketing to the present date, 308 days have elapsed. On the date requested, 345 days will have elapsed since docketing.

convening authority took no action on the findings or sentence. (Convening Authority Decision on Action.)

The record of trial consists of seven volumes with a 199-page transcript. There are four prosecutions exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. Appellant is not currently in confinement. Appellant has been advised of his right to timely appellate review, as well as the request for an enlargement of time. Appellant has agreed to the request for an enlargement of time. Additionally, counsel has been in communication with Appellant concerning the status of the case, but does not have a substantive update at this time. Counsel asserts attorney-client privilege regarding the substance of those communications.

Undersigned counsel is currently assigned to represent eighteen service members; seven cases are pending initial AOE's before this Court. Undersigned counsel's priorities are as follows:

- 1) *United States v. Adams*, ACM 22018 – The record of trial consists of four volumes and a 299-page transcript. There are two prosecution exhibits, three defense exhibits, and seventeen appellate exhibits. This case is on its seventh enlargement of time. A brief is due to this Court on 16 April 2025.
- 2) *United States v. Torres Gonzalez*, ACM 24001 – The record of trial consists of six volumes and a 608-page transcript. There are 46 prosecutions exhibits, eight defense exhibits, and 25 appellate exhibits. This case is on its tenth enlargement of time. A brief is due to this Court on 28 April 2025, although counsel hopes to submit before then.
- 3) *United States v. Licea*, ACM 40602 – The record of trial consists of seven volumes with a 199-page transcript. There are four prosecutions exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. A brief is due for this case on 18 April 2025, although there is a pending a request for enlargement of time that would extend the deadline by 30 days.
- 4) *United States v. Quinones Reyes*, ACM 40636 – This is the instant case.

Through no fault of appellant, undersigned counsel has been working on other assigned matters and has been unable to complete an in-depth review of the record of trial. An enlargement of time is warranted in this case because on 21 March 2025 this Court denied undersigned counsel's request for enlargement of time in *United States v. Copp*, ACM 24029 without explanation and without an opportunity to file a timely renewed request due to the 27 March 2025 filing deadline for an assignment of errors. This forced counsel to reorient all of his priorities to comply with the 27 March 2025 deadline. Following this, counsel dealt with back-to-back deadlines and submitted an assignment of errors to this Court in *United states v. Copp* on 27 March 2025, a reply brief to the Court of Appeals for the Armed Forces in *United States v. Cook* on 2 April 2025, and a reply brief to this Court in *United States v. Sanger* on 7 April 2025. Counsel is now working towards finalizing assignments of error in *United States v. Adams* and *United States v. Torres Gonzalez*. Following this, counsel will be clear to make *United States v. Licea* and this case his top priority. Counsel recognizes this Court's concern about the number of days which have elapsed since this case was docketed, but submits that he has been working through constant deadlines in other cases. Counsel is looking forward to clearing out his other remaining priorities so that he can dedicate the time necessary to zealously advocate for TSgt Quinones Reyes. Counsel is hopeful that a brief can be submitted in this case without having to ask for enlargements of time past 360 days since docketing. Should this court not be inclined to grant to this request for enlargement of time, Counsel respectfully requests a status conference as indicated in this Court's order regarding the seventh enlargement of time. Accordingly, an enlargement of time is necessary for counsel to fully review Appellant's case and advise on potential errors.

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

Respectfully submitted,

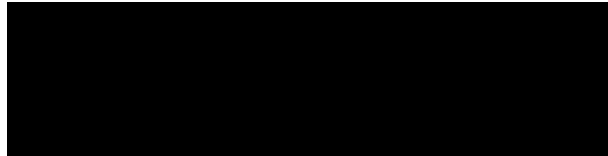


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CERTIFICATE OF FILING AND SERVICE

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 14 April 2025.

Respectfully submitted,



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IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' OPPOSITION
)	TO APPELLANT'S MOTION FOR
<i>Appellee,</i>)	ENLARGEMENT OF TIME
)	
v.)	
)	Before Panel No. 3
Technical Sergeant (E-6))	
JAMIE QUINONES-REYES,)	No. ACM 40636
United States Air Force.)	
<i>Appellant</i>)	16 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 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 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.



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 16 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

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME (NINTH)
)	
v.)	Before Panel 3
)	
Technical Sergeant (E-6),)	No. ACM 40636
JAIME QUINONES-REYES,)	
United States Air Force,)	14 May 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) 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 Errors (AOE). Appellant requests an enlargement for a period of 15 days, which will end on **5 June 2025**. This case was docketed with this Court on 10 June 2024.¹ This Court appears to have acknowledged receipt of the record of trial with the verbatim transcript on 25 June 2024. From the date of that receipt to the present date, 323 days have elapsed. On the date requested 345 days will have elapsed since the date of receipt.

On 30 August 2023, a general court-martial convened at Joint Base McGuire-Dix-Lakerhurst, New Jersey, convicted Technical Sergeant (TSgt) Jaime R. Quinones-Reyes, consistent with his pleas, of one charge and two specifications of domestic violence in violation of Article 128, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 928; and one charge and specification of obstruction of justice in violation of Article 131, UCMJ, 10 U.S.C. § 931. (R. at 129) The military judge sentenced Appellant to 90 days of confinement and to reduction to the pay-grade of E-5. (Record of Trial (ROT) Vol. 1, Entry of Judgment, dated 17 October 2023; R. at 198.) The

¹ From the date of docketing to the present date, 338 days have elapsed. On the date requested, 360 days will have elapsed since docketing.

convening authority took no action on the findings or sentence. (Convening Authority Decision on Action.)

The record of trial consists of seven volumes with a 199-page transcript. There are four prosecutions exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. Appellant is not currently in confinement. Appellant has been advised of his right to timely appellate review, as well as the request for an enlargement of time. Appellant has agreed to the request for an enlargement of time. Additionally, counsel has been in communication with Appellant concerning the status of the case, but does not have a substantive update at this time. Counsel asserts attorney-client privilege regarding the substance of those communications.

Undersigned counsel is currently assigned to represent eighteen service members; five cases are pending initial AOE's before this Court. Undersigned counsel's priorities are as follows:

- 1) *United States v. Licea*, ACM 40602 – The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are twelve prosecution exhibits, five defense exhibits, twenty-two appellate exhibits, and one court exhibit. This case is on its tenth enlargement of time. A brief is due to this Court on 18 May 2025.

- 2) *United States v. Quinones Reyes*, ACM 40636 – This is the instant case.

- 3) *United States v. Campbell*, ACM 40642 – The record of trial includes an 892 page transcript.

There are 11 prosecution exhibits, 19 defense exhibits, 18 appellate exhibits, and one court exhibit.

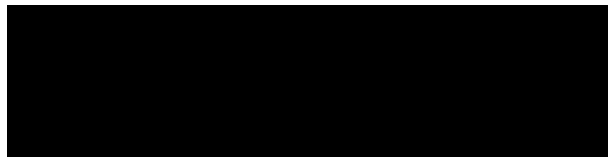
This case is on its eighth enlargement of time. A brief is due to this Court on 10 June 2025.

Through no fault of appellant, undersigned counsel has been working on other assigned matters and has been unable to complete an in-depth review of the record of trial. Over the past thirty days, counsel has had to balance a number of competing priorities which have prevented further work on this case. This included submission of assignments of error to this Court for *United States v. Torres Gonzalez* and *United States v. Adams*. Counsel also submitted a reply brief to this

Court in *United States v. Torres Gonzalez*. Counsel's top priority is *United States v. Licea* which counsel is working to resolve without any further enlargements of time. However, counsel also has oral arguments before the Court of Appeals for the Armed Forces in *United States v. Cook* which is scheduled to take place on 20 May 2025. Preparations for that are occupying the majority of counsel's time. After that concludes this case will become counsel's top priority. Counsel has already reviewed roughly half of the record of trial, and does not anticipate asking for any additional enlargements of time. However, additional time is necessary for counsel to complete work on this case in light of his other priorities. Moreover, the record of trial contains sealed materials that counsel intends to file a motion to view. Review those materials will be necessary before counsel can submit and assignment of errors. Accordingly, an enlargement of time is necessary for counsel to fully review Appellant's case and advise on potential errors.

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

Respectfully submitted,

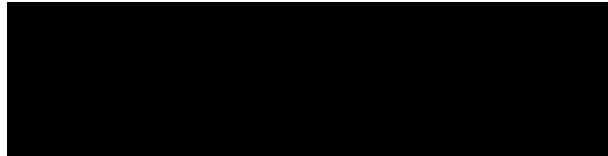


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CERTIFICATE OF FILING AND SERVICE

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 14 May 2025.

Respectfully submitted,



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IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' OPPOSITION
)	TO APPELLANT'S MOTION FOR
<i>Appellee,</i>)	ENLARGEMENT OF TIME
)	
v.)	
)	Before Panel No. 3
Technical Sergeant (E-6))	
JAIME QUINONES-REYES,)	No. ACM 40636
United States Air Force.)	
<i>Appellant</i>)	15 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 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 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.

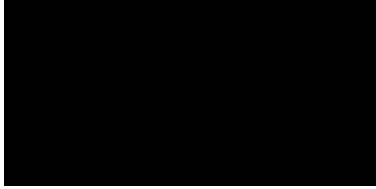
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



JOCELYN Q. WRIGHT, 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 15 May 2025.



JOCELYN Q. WRIGHT, 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 40636
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Jaime QUINONES REYES)	
Technical Sergeant (E-6))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 2

On 29 May 2025, counsel for Appellant submitted a Motion for Enlargement of Time (Tenth) requesting an additional 14 days to submit Appellant's assignments of error. The Government opposed the motion.

On 4 June 2025, the court held a status conference to discuss the progress of this case. Appellant was represented by Captain Michael J. Bruzik; Lieutenant Colonel Allen S. Abrams and Mr. Dwight H. Sullivan from the Appellate Defense Division were also present. Colonel Matthew D. Talcott represented the Government. Captain Bruzik advised the court, *inter alia*, that he expected Appellant would submit a motion to withdraw from appellate review on either 4 or 5 June 2025. On 5 June 2025, Appellant submitted a motion to withdraw from appellate review, which is currently pending before the court.

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

Accordingly, it is by the court on this 5th day of June, 2025,

ORDERED:

Appellant's Motion for Enlargement of Time (Tenth) is **GRANTED**. Appellant shall file any assignments of error not later than **19 June 2025**.



FOR THE COURT



ROBERT DRIESSEN, Maj, USAF
Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME (TENTH)
)	
v.)	Before Panel 2
)	
Technical Sergeant (E-6),)	No. ACM 40636
JAIME QUINONES-REYES,)	
United States Air Force,)	29 May 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) 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 Errors (AOE). Appellant requests an enlargement for a period of 14 days, which will end on **19 June 2025**. This case was docketed with this Court on 10 June 2024.¹ This Court appears to have acknowledged receipt of the record of trial with the verbatim transcript on 25 June 2024. From the date of that receipt to the present date, 338 days have elapsed. On the date requested 359 days will have elapsed since the date of receipt.

On 30 August 2023, a general court-martial convened at Joint Base McGuire-Dix-Lakerhurst, New Jersey, convicted Technical Sergeant (TSgt) Jaime R. Quinones-Reyes, consistent with his pleas, of one charge and two specifications of domestic violence in violation of Article 128, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 928; and one charge and specification of obstruction of justice in violation of Article 131, UCMJ, 10 U.S.C. § 931. (R. at 129) The military judge sentenced Appellant to 90 days of confinement and to reduction to the pay-grade of E-5. (Record of Trial (ROT) Vol. 1, Entry of Judgment, dated 17 October 2023; R. at 198.) The

¹ From the date of docketing to the present date, 353 days have elapsed. On the date requested, 374 days will have elapsed since docketing.

convening authority took no action on the findings or sentence. (Convening Authority Decision on Action.)

The record of trial consists of seven volumes with a 199-page transcript. There are four prosecutions exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. Appellant is not currently in confinement. Appellant has been advised of his right to timely appellate review, as well as the request for an enlargement of time. Appellant has agreed to the request for an enlargement of time. Additionally, counsel has been in communication with Appellant concerning the status of the case. Counsel asserts attorney-client privilege regarding the substance of those communications.

Undersigned counsel is currently assigned to represent eighteen service members; four cases are pending initial AOE's before this Court. Undersigned counsel's priorities are as follows:

- 1) *United States v. Quinones Reyes*, ACM 40636 – This is the instant case.
- 2) *United States v. Martinez*, ACM 39903 (f rev) – The record of trial from the remanded hearing consists of three volumes. The transcript is 134 pages. There are five prosecution exhibits, one defense exhibit, and 15 appellate exhibits. The record of trial from the initial trial consists of 11 prosecution exhibits, 24 defense exhibits, 85 appellate exhibits, and includes a 134 page transcript. A brief is due to this Court on 5 June 2025.
- 3) *United States v. Campbell*, ACM 40642 – The record of trial includes an 892 page transcript. There are 11 prosecution exhibits, 19 defense exhibits, 18 appellate exhibits, and one court exhibit. This case is on its eighth enlargement of time. A brief is due to this Court on 10 June 2025.
- 4) *United States v. Waddell*, ACM 24061 - The record of trial consists of seven volumes with a 199-page transcript. There are four prosecutions exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. A brief is due to this Court on 8 June 2025.

Through no fault of appellant, undersigned counsel has been working on other assigned

matters and has been unable to begin work on an assignment of errors in this case. Exceptional circumstances warrant this request for enlargement of time because counsel has several competing priorities in close proximity to the deadline for submission of a brief in this case. This includes *United States v. Martinez* which shares the same due date on 5 June 2025. Additionally, counsel must submit a reply brief to this court in *United States v. Torres Gonzalez* which is due by 4 June 2025. These competing priorities strain counsel's ability to zealously advocate for TSgt Quinones-Reyes. Moreover, although counsel has reviewed the majority of the record of trial, counsel still has to review the sealed materials. A motion to view the sealed materials will be filed concurrently with this motion. Following this, counsel will complete final coordination with TSgt Quinones-Reyes to ensure that his interests are being carried out through the appellate process. This request is also warranted because counsel has been task saturated since this Court granted the ninth enlargement of time. This includes counsel's extensive preparation for oral arguments before the Court of Appeals for the Armed Forces in *United States v. Cook* which took place on 20 May 2025. Counsel had to balance that with submission of a reply brief to this Court in *United States v. Adams* on 23 May 2025 and completion of his review of the record of trial in *United States v. Licea* which resulted in submission of a merits brief on 19 May 2025. Although counsel had intended to complete work on the initial brief for the instant case without asking for additionally enlargements of time, the exceptional circumstances outlined above have prevented that. Accordingly, an enlargement of time is necessary for counsel to advise TSgt Quinones-Reyes and to draft an assignment of errors. Should this Court not be inclined to grant this motion, counsel respectfully requests a status conference.

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

Respectfully submitted,

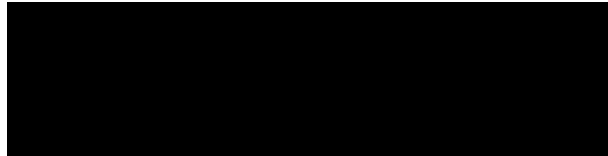


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CERTIFICATE OF FILING AND SERVICE

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 29 May 2025.

Respectfully submitted,



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IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' OPPOSITION
)	TO APPELLANT'S MOTION FOR
<i>Appellee,</i>)	ENLARGEMENT OF TIME
)	
v.)	
)	Before Panel No. 2
Technical Sergeant (E-6))	
JAIME QUINONES-REYES,)	No. ACM 40636
United States Air Force.)	
<i>Appellant</i>)	2 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 359 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.

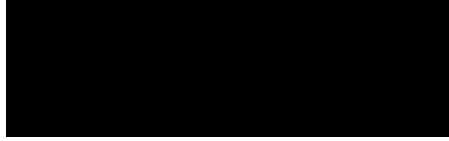
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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 2 June 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 40636
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Jaime R. QUINONES REYES)	
Technical Sergeant (E-6))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 2

On 29 May 2025, counsel for Appellant submitted a Motion to Examine Sealed Materials, requesting authorization to examine Appellate Exhibits VI, VII, VIII, IX, X, XI, XII, and XIV, which were reviewed by trial counsel and trial defense counsel at Appellant’s court-martial, as well as transcript pages 22–65, all of which are sealed. The Government does not oppose the motion so long as its counsel are also permitted to view the sealed material.

Appellant’s motion incorrectly identifies Appellate Exhibit XII as “Ruling and Order: Government Motion to Exclude Improper Character Evidence, dated 4 May 2023, 6 pages.” Appellate Exhibit XII, which is sealed, is in fact a one-page excerpt of a transcript of Appellant’s interview by the Air Force Office of Special Investigations. The “Ruling and Order: Government Motion to Exclude Improper Character Evidence” is Appellate Exhibit XIII, and is not sealed.

Appellate counsel may examine sealed materials released to counsel at trial “upon a colorable showing . . . that examination is reasonably necessary to a proper fulfillment of the appellate counsel’s responsibilities” Rule for Courts-Martial 1113(b)(3)(B)(i), *Manual for Courts-Martial, United States* (2024 ed.).

The court finds Appellant has made a colorable showing that review of the identified sealed materials is reasonably necessary for a proper fulfillment of appellate counsel’s responsibilities—including Appellate Exhibit XII, notwithstanding the misidentification of the exhibit in the

motion. This court's order permits counsel for both parties to examine the materials.

Accordingly, it is by the court on this 3d day of June, 2025,

ORDERED:

Appellant's Motion to Examine Sealed Materials dated 29 May 2025 is **GRANTED**.

Appellate defense counsel and appellate government counsel may view **Appellate Exhibits VI, VII, VIII, IX, X, XI, XII, and XIV**, as well as **transcript pages 22–65**, subject to the following conditions:

To view the sealed materials, counsel will coordinate with the court.

No counsel granted access to the materials may photocopy, photograph, reproduce, disclose, or make available the content to any other individual without the court's prior written authorization.



FOR THE COURT



CAROL K. JOYCE
Clerk of the Court

UNITED STATES)	APPELLANT'S MOTION TO
<i>Appellee,</i>)	EXAMINE SEALED
)	MATERIALS
v.)	
)	Before Panel No. 2
Technical Sergeant (E-6))	
JAIME QUINONES-REYES,)	No. ACM 40636
United States Air Force)	
<i>Appellant</i>)	29 May 2025

Pursuant to Rule for Courts-Martial (R.C.M.) 1113(b)(3)(B)(i) and Rule 23.3(f)(1) of this Honorable Court's Rules of Practice and Procedure, undersigned counsel hereby moves to examine the following sealed items:

- App. Ex. VI – Government Motion to Admit Evidence Pursuant to M.R.E. 412, dated 7 March 2023, 12 pages.
- App. Ex. VII – Victims’ Counsel’s Response to Government Motion to Admit Evidence under M.R.E. 412, dated 10 March 2023, 18 pages
- App. Ex. VIII – Motion to Admit M.R.E. 412 Evidence, dated 6 March 2023, 18 pages.
- App. Ex. IX – Government Response to Defense Notice and Motion to Admit Evidence under M.R.E. 412, dated 10 March 2023, 13 pages.
- App. Ex. X – Victims’ Counsel’s Response to Defense Motion to Admit Evidence under M.R.E. 412, dated 10 March 2023, 20 pages.

- App. Ex. XI – E-mail exchange between counsel and the military judge regarding compelling production of M.R., undated.
- App. Ex. XII – Ruling and Order: Government Motion to Exclude Improper Character Evidence, dated 4 May 2023, 6 pages.
- App. Ex. XIV – Ruling and Order: Defense Motion to Admit M.R.E. 412 Evidence, dated 4 May 2023, 6 pages.
- Transcript pages 22 – 65.

In accordance with R.C.M. 1113(b)(3)(B)(i), which requires a colorable showing that examining these materials is reasonably necessary to fulfill appellate counsel's responsibilities, undersigned counsel asserts that viewing the referenced materials is reasonably necessary to assess whether the record of trial is complete, whether trial defense counsel was effective during the motion practice, and what impact the military judge's rulings may have had on the proceedings. The sealed portions raise the potential for appellate issues. The materials were available to both trial counsel and trial defense counsel during the court-martial.

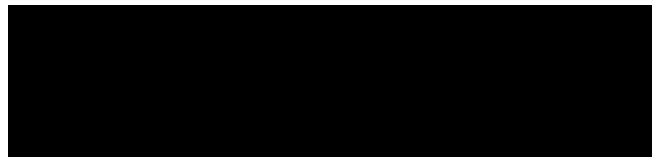
To determine whether the record of trial yields grounds for this Court to grant relief under Article 66(d), UCMJ, 10 U.S.C. § 866(d), appellate defense counsel must examine "the entire record."

Although Courts of Criminal Appeals have a broad mandate to review the record unconstrained by an appellant's assignments of error, that broad mandate does not reduce the importance of adequate representation. As we said in *United States v. Ortiz*, 24 M.J. 323, 325 (C.M.A. 1987), independent review is not the same as competent appellate representation.

United States v. May, 47 M.J. 478, 481 (C.A.A.F. 1998). Undersigned counsel must review the sealed materials to provide “competent appellate representation.” *See id.* Accordingly, good cause exists in this case since undersigned counsel cannot fulfill his duty of representation under Article 70, UCMJ, 10 U.S.C. § 870, without first reviewing these exhibits.

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

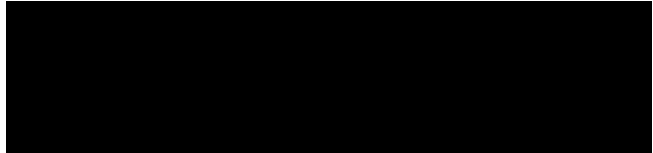
Respectfully submitted,



MICHAEL J. BRUZYK, Capt, USAF
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CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 29 May 2025.



MICHAEL J. BRUZYK, Capt, USAF
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IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES, <i>Appellant,</i>)	UNITED STATES’
)	RESPONSE TO APPELLANT’S
)	MOTION TO EXAMINE
)	SEALED MATERIALS
)	
v.)	Before Panel No. 2
)	
Technical Sergeant (E-6))	No. ACM 40636
JAIME QUINONES-REYES)	
United States Air Force)	2 June 2025
<i>Appellee</i>)	

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

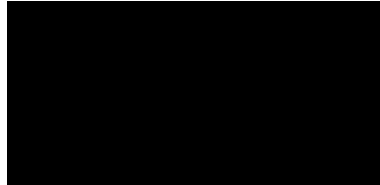
The United States responds pursuant to Rule for Courts-Martial (R.C.M.) 1113(b)(3)(B) and Rules 3.1 and 23.3(f) of this Honorable Court’s Rules of Practice and Procedure. The United States does not object to Appellant’s counsel reviewing any materials listed in Appellant’s motion that were viewed by all parties at trial, on the condition that the United States is permitted to view the same materials in answering Appellant’s assignments of error.

The United States would not consent to Appellant’s counsel viewing any exhibits that were reviewed in camera but not released to the parties unless this Court has first determined there is good cause for Appellant’s counsel to do so under R.C.M. 1113.

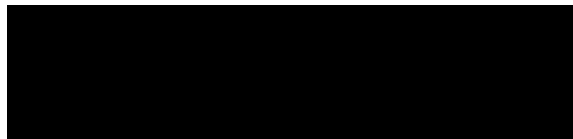
The United States agrees that in accordance with R.C.M. 1113(b)(3)(B)(i), appellate defense counsel has made a colorable showing that examination of these materials is reasonably necessary to appellate counsel’s responsibilities. But review of the referenced appellate exhibits is also necessary for the appellate government counsel to conduct a complete review of the record and to advocate competently on behalf of the United States in response to Appellant’s

assignments of error. The United States respectfully requests that any order issued by this Court also allow counsel for the United States to view the sealed materials.

WHEREFORE, undersigned counsel respectfully requests that this Honorable Court grant Appellant's motion with the United States' requested conditions.



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CERTIFICATE OF FILING AND SERVICE

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



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UNITED STATES)	No. ACM 40636
<i>Appellee</i>)	
)	
v.)	
)	NOTICE OF PANEL CHANGE
Jaime R. QUINONES-REYES)	
Technical Sergeant Basic (E-6))	
U.S. Air Force)	
<i>Appellant</i>)	

OLGA STANFORD, Capt, USAF
Chief Commissioner