

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

UNITED STATES,

*Appellee,*

v.

Technical Sergeant (E-6)

**JACOB A. SEE,**

United States Air Force,

*Appellant.*

) **APPELLANT'S MOTION**

) **FOR ENLARGEMENT**

) **OF TIME (FIRST)**

)

) Before Panel No. 3

)

) No. ACM S32805

)

) 10 February 2025

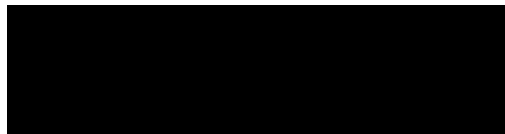
**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES  
AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(1) and (2) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 60 days, which will end on **22 April 2025**.

Appellant's case was docketed with this Court on 23 December 2024. From the date of docketing to the present date, 49 days have elapsed. On the date requested, 120 days will have elapsed since docketing.

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

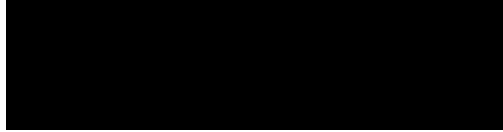
Respectfully submitted,



JORDAN L. GRANDE, Capt, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
1500 West Perimeter Road, Suite 1100  
Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
Email: jordan.grande@us.af.mil

## **CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 10 February 2025.



JORDAN L. GRANDE, Capt, USAF  
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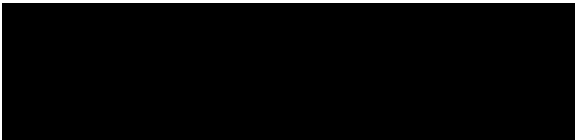
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
	)	OF TIME
v.	)	
	)	
Technical Sergeant (E-6)	)	ACM S32805
JACOB A. SEE, 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.

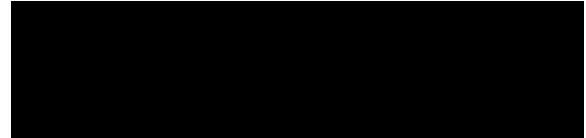
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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 12 February 2025.



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

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

UNITED STATES	)	No. ACM S32805
<i>Appellee</i>	)	
	)	
v.	)	
	)	<b>ORDER</b>
Jacob A. SEE	)	
Technical Sergeant (E-6)	)	
U.S. Air Force	)	
<i>Appellant</i>	)	<b>Panel 3</b>

On 10 February 2025, counsel for Appellant submitted a Motion for Enlargement of Time (First), requesting an additional 60 days in which to file Appellant's assignments of error. The Government opposes the motion.

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

Accordingly, it is by the court on this 13th day of February, 2025,

**ORDERED:**

Appellant's Motion for Enlargement of Time (First) is **GRANTED**. Appellant shall file any assignments of error not later than **22 April 2025**.

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



FOR THE COURT



OLGA STANFORD, Capt, USAF  
Chief Commissioner

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

**UNITED STATES,**

*Appellee,*

v.

Technical Sergeant (E-6)

**JACOB A. SEE,**

United States Air Force,

*Appellant.*

) **APPELLANT'S MOTION**

) **FOR ENLARGEMENT**

) **OF TIME (SECOND)**

)

) Before Panel No. 3

)

) No. ACM S32805

)

) 11 April 2025

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

Pursuant to Rule 23.3(m)(1) and (4) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **22 May 2025**.

Appellant's case was docketed with this Court on 23 December 2024. From the date of docketing to the present date, 109 days have elapsed. On the date requested, 150 days will have elapsed since docketing.

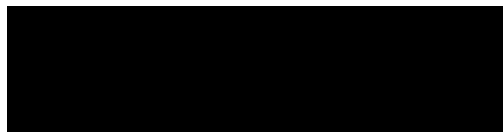
From 7 through 8 March 2024, Appellant was tried by a General Court-Martial composed of a military judge at Kunsan Air Base, Republic of Korea. R. at 1, 19; Entry of Judgment (EOJ). Appellant was convicted consistent with his pleas and pursuant to a plea agreement, of One Charge with Five Specifications of assault consummated by a battery, in violation of Article 128, Uniform Code of Military Justice (UCMJ); and One Charge with One Specification of child endangerment, in violation of Article 119b, UCMJ. R. at 21, 179, 207; Appellate Ex. III. The military judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, forfeit \$1000 pay per month for six months, confined for a period of 120 days, and a bad conduct discharge. R. at 340.

The record of trial consists of one e-ROT with two volumes, three Prosecution Exhibits, two Court Exhibits, six Defense Exhibits, and four Appellate Exhibits; the transcript is 341 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of this case.

Through no fault of Appellant, undersigned counsel has been unable to prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to prepare a brief for Appellant's case. Appellant was advised of his right to a timely appeal. Appellant has been provided an update on the status of undersigned counsel's progress on this case. Appellant was advised of the request for this enlargement of time. Appellant provided limited consent to disclose a confidential communication with counsel wherein Appellant consented to the request for this enlargement.

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

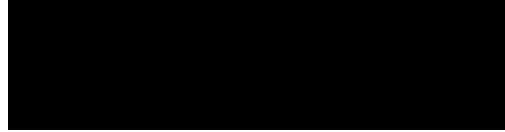
Respectfully submitted,



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
1500 West Perimeter Road, Suite 1100  
Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
Email: jordan.grande@us.af.mil

## **CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 11 April 2025.



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
1500 West Perimeter Road, Suite 1100  
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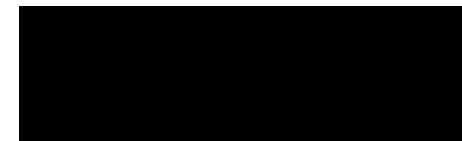
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
	)	OF TIME
v.	)	
	)	
	)	Before Panel No. 3
Technical Sergeant (E-6)	)	
<b>JACOB A. SEE,</b>	)	No. ACM S32805
United States Air Force,	)	
<i>Appellant.</i>	)	
	)	15 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.

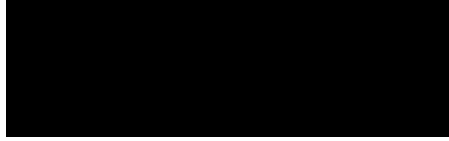
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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 15 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

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

UNITED STATES	)	No. ACM S32805
<i>Appellee</i>	)	
	)	
v.	)	
	)	NOTICE OF PANEL CHANGE
Jacob A. SEE	)	
Technical Sergeant (E-6)	)	
U.S. Air Force	)	
<i>Appellant</i>	)	

It is by the court on this 6th day of May, 2025,

**ORDERED:**

That the Record of Trial in the above-styled matter is withdrawn from Panel 3 and referred to Panel 1 for appellate review.

This panel letter supersedes all previous panel assignments.



FOR THE COURT



OLGA STANFORD, Capt, USAF  
Chief Commissioner

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

**UNITED STATES,**

*Appellee,*

V.

## Technical Sergeant (E-6)

**JACOB A. SEE,**

United States Air Force,

*Appellant.*

## **) APPELLANT'S MOTION**

## ) FOR ENLARGEMENT

### ) OF TIME (THIRD)

)

) Before Panel No. 1

)

) No. ACM S32805

)

) 15 May 2025

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

Pursuant to Rule 23.3(m)(1) and (4) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **21 June 2025**.

Appellant's case was docketed with this Court on 23 December 2024. From the date of docketing to the present date, 143 days have elapsed. On the date requested, 180 days will have elapsed since docketing.

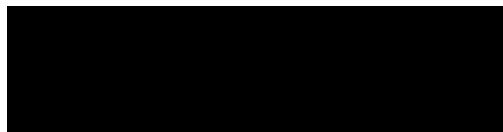
From 7 through 8 March 2024, Appellant was tried by a General Court-Martial composed of a military judge at Kunsan Air Base, Republic of Korea. R. at 1, 19; Entry of Judgment (EOJ). Appellant was convicted consistent with his pleas and pursuant to a plea agreement, of One Charge with Five Specifications of assault consummated by a battery, in violation of Article 128, Uniform Code of Military Justice (UCMJ); and One Charge with One Specification of child endangerment, in violation of Article 119b, UCMJ. R. at 21, 179, 207; Appellate Ex. III. The military judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, forfeit \$1000 pay per month for six months, confined for a period of 120 days, and a bad conduct discharge. R. at 340.

The record of trial consists of one e-ROT with two volumes, three Prosecution Exhibits, two Court Exhibits, six Defense Exhibits, and four Appellate Exhibits; the transcript is 341 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of this case.

Through no fault of Appellant, undersigned counsel has been unable to prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to prepare a brief for Appellant's case. Appellant was advised of his right to a timely appeal. Appellant has been provided an update on the status of undersigned counsel's progress on this case. Appellant was advised of the request for this enlargement of time. Appellant provided limited consent to disclose a confidential communication with counsel wherein Appellant consented to the request for this enlargement.

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

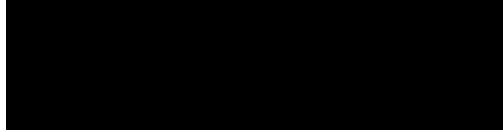
Respectfully submitted,



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
1500 West Perimeter Road, Suite 1100  
Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
Email: jordan.grande@us.af.mil

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Appellate Defense Counsel  
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Office: (240) 612-4770  
Email: [jordan.grande@us.af.mil](mailto:jordan.grande@us.af.mil)

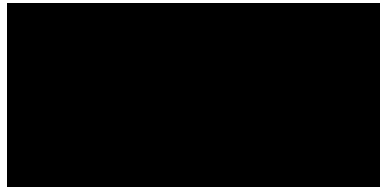
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
	)	OF TIME
v.	)	
	)	
	)	Before Panel No. 1
Technical Sergeant (E-6)	)	
<b>JACOB A. SEE,</b>	)	No. ACM S32805
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 general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

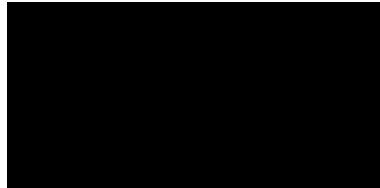
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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



From 7 through 8 March 2024, Appellant was tried by a General Court-Martial composed of a military judge at Kunsan Air Base, Republic of Korea. R. at 1, 19; Entry of Judgment (EOJ). Appellant was convicted consistent with his pleas and pursuant to a plea agreement, of One Charge with Five Specifications of assault consummated by a battery, in violation of Article 128, Uniform Code of Military Justice (UCMJ); and One Charge with One Specification of child endangerment, in violation of Article 119b, UCMJ. R. at 21, 179, 207; Appellate Ex. III. The military judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, forfeit \$1000 pay per month for six months, confined for a period of 120 days, and a bad conduct discharge. R. at 340.

The record of trial consists of one e-ROT with two volumes, three Prosecution Exhibits, two Court Exhibits, six Defense Exhibits, and four Appellate Exhibits; the transcript is 341 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of this case.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel also provides the following information: Maj Grande is currently assigned 27 cases; 22 cases are pending before this Court (18 cases are pending AOE). Nine cases have priority over the present case:

1. *United States v. Ingram*, No. ACM S32781– The record of trials is three volumes consisting of two Prosecution Exhibits and four Appellate Exhibits. The transcript is 86 pages. On 6 June 2025, this Court ordered briefs on a specified issue, due not later than 20 June 2025. Undersigned counsel is currently drafting this brief.
2. *United States v. Hedgepeth*, No. ACM 40681– The record of trial is four volumes consisting of three Prosecution Exhibits, one Court Exhibit, three Defense Exhibits, and five Appellate Exhibits; the transcript is 115 pages long. Undersigned counsel is currently drafting the AOE for this case.
3. *United States v. Rockrich*, No. ACM 40666 – The record of trial consists of two Prosecution Exhibits, one Defense Exhibit, and sixteen Appellate Exhibits; the transcript is 96 pages long. Appellant is currently confined. Undersigned counsel has completed her review of the record in this case but has not yet drafted the AOE.
4. *United States v. Hilson*, No. ACM 24063 – The record of trial consists of one E-ROT with two volumes. It contains two Prosecution Exhibits, one Court Exhibit, eight Defense Exhibits, and four Appellate Exhibits. The transcript is 156 pages long.

Undersigned counsel has completed her review of the record in this case but has not yet drafted the AOE.

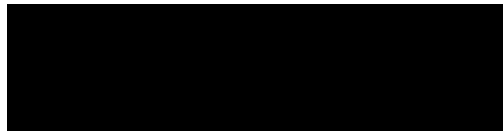
5. *United States v. Fundis*, No. ACM 40689- The record of trial consists of six volumes, with eight Prosecution Exhibits, two Court Exhibits, eighteen Defense Exhibits, and eighteen Appellate Exhibits. The transcript is 377 pages long. Undersigned counsel has not yet completed her review of the record in this case.
6. *United States v. Reese*, No. ACM 24069 – The record of trial consists of one E-ROT containing two volumes, with twelve Prosecution Exhibits, four Court Exhibits, fourteen Defense Exhibits, and fifty-six Appellate Exhibits. The transcript is 1,310 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of the record for this case.
7. *United States v. Castillo*, No. ACM 40705 – The record of trial consists of seven volumes, with five Prosecution Exhibits, one Court Exhibit, one Defense Exhibit, and thirty-four Appellate Exhibits. The transcript is 470 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of the record for this case.
8. *United States v. Heilig*, No. ACM 40740 – The record of trials consists of one e-ROT with six volumes, three Prosecution Exhibits, eight Defense Exhibits, and six Appellate Exhibits; the transcript is 135 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of the record for this case.
9. *United States v. Cunningham*, No. ACM 40746 – The record of trial consists of ten volumes with twelve Prosecution Exhibits, one Court Exhibit, seven Defense Exhibits, and eighty-five Appellate Exhibits. The transcript is 1,249 pages long. Appellant is

currently confined. Undersigned counsel has not yet completed her review of the record for this case.

Through no fault of Appellant, undersigned counsel has been unable to prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to prepare a brief for Appellant's case. Appellant was advised of his right to a timely appeal. Appellant has been provided an update on the status of undersigned counsel's progress on this case. Appellant was advised of the request for this enlargement of time. Appellant provided limited consent to disclose a confidential communication with counsel wherein Appellant consented to the request for this enlargement.

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

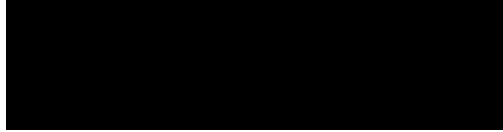
Respectfully submitted,



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
1500 West Perimeter Road, Suite 1100  
Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
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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 Air Force Government Trial and Appellate Operations Division on 9 June 2025.



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
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Joint Base Andrews NAF, MD 20762-6604  
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Email: [jordan.grande@us.af.mil](mailto:jordan.grande@us.af.mil)

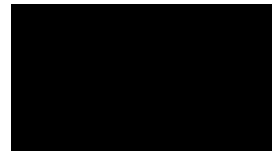
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

<b>UNITED STATES,</b>	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
	)	OF TIME
v.	)	
	)	
	)	Before Panel No. 1
Technical Sergeant (E-6)	)	
<b>JACOB A. SEE,</b>	)	No. ACM S32805
United States Air Force,	)	
<i>Appellant.</i>	)	
	)	11 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 general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

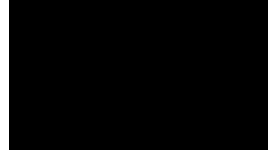
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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 June 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,	)	APPELLANT’S MOTION
<i>Appellee,</i>	)	FOR ENLARGEMENT
	)	OF TIME (FIFTH)
v.	)	
	)	Before Panel No. 1
Technical Sergeant (E-6)	)	
JACOB A. SEE,	)	No. ACM S32805
United States Air Force,	)	
<i>Appellant.</i>	)	13 July 2025

Pursuant to Rule 23.3(m)(1) and (4) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **20 August 2025**.

Appellant's case was docketed with this Court on 23 December 2024. From the date of docketing to the present date, 202 days have elapsed. On the date requested, 240 days will have elapsed since docketing.

From 7 through 8 March 2024, Appellant was tried by a General Court-Martial composed of a military judge at Kunsan Air Base, Republic of Korea. R. at 1, 19; Entry of Judgment (EOJ). Appellant was convicted consistent with his pleas and pursuant to a plea agreement, of One Charge with Five Specifications of assault consummated by a battery, in violation of Article 128, Uniform Code of Military Justice (UCMJ); and One Charge with One Specification of child endangerment, in violation of Article 119b, UCMJ. R. at 21, 179, 207; Appellate Ex. III. The military judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, forfeit \$1000 pay per month for six months, confined for a period of 120 days, and a bad conduct discharge. R. at 340.



The record of trial consists of one e-ROT with two volumes, three Prosecution Exhibits, two Court Exhibits, six Defense Exhibits, and four Appellate Exhibits; the transcript is 341 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of this case.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel also provides the following information: Maj Grande is currently assigned 30 cases; 24 cases are pending before this Court (20 cases are pending AOE). Six cases have priority over the present case:

1. *United States v. Hilson*, No. ACM 24063 – The record of trial consists of one E-ROT with two volumes. It contains two Prosecution Exhibits, one Court Exhibit, eight Defense Exhibits, and four Appellate Exhibits. The transcript is 156 pages long. Undersigned counsel has completed her review of the record in this case but has not yet drafted the AOE.
2. *United States v. Fundis*, No. ACM 40689- The record of trial consists of six volumes, with eight Prosecution Exhibits, two Court Exhibits, eighteen Defense Exhibits, and eighteen Appellate Exhibits. The transcript is 377 pages long. Undersigned counsel has not yet completed her review of the record in this case.
3. *United States v. Reese*, No. ACM 24069 – The record of trial consists of one E-ROT containing two volumes, with twelve Prosecution Exhibits, four Court Exhibits, fourteen Defense Exhibits, and fifty-six Appellate Exhibits. The transcript is 1,310 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of the record for this case.
4. *United States v. Castillo*, No. ACM 40705 – The record of trial consists of seven volumes, with five Prosecution Exhibits, one Court Exhibit, one Defense Exhibit, and

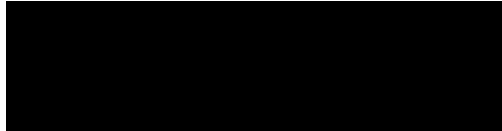
thirty-four Appellate Exhibits. The transcript is 470 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of the record for this case.

5. *United States v. Heilig*, No. ACM 40740 – The record of trials consists of one e-ROT with six volumes, three Prosecution Exhibits, eight Defense Exhibits, and six Appellate Exhibits; the transcript is 135 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of the record for this case.
6. *United States v. Cunningham*, No. ACM 40746 – The record of trial consists of ten volumes with twelve Prosecution Exhibits, one Court Exhibit, seven Defense Exhibits, and eighty-five Appellate Exhibits. The transcript is 1,249 pages long. Appellant is currently confined. Undersigned counsel has not yet completed her review of the record for this case.

Through no fault of Appellant, undersigned counsel has been unable to prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to prepare a brief for Appellant's case. Appellant was advised of his right to a timely appeal. Appellant has been provided an update on the status of undersigned counsel's progress on this case. Appellant was advised of the request for this enlargement of time. Appellant provided limited consent to disclose a confidential communication with counsel wherein Appellant consented to the request for this enlargement.

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

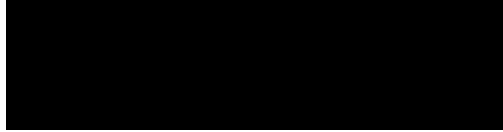
Respectfully submitted,



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
1500 West Perimeter Road, Suite 1100  
Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
Email: [jordan.grande@us.af.mil](mailto:jordan.grande@us.af.mil)

## **CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 13 July 2025.



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
1500 West Perimeter Road, Suite 1100  
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Office: (240) 612-4770  
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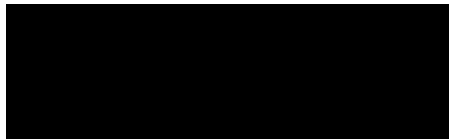
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
	)	OF TIME
v.	)	
	)	
	)	Before Panel No. 1
Technical Sergeant (E-6)	)	
<b>JACOB A. SEE,</b>	)	No. ACM S32805
United States Air Force,	)	
<i>Appellant.</i>	)	
	)	15 July 2025

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

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

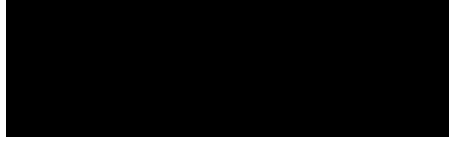
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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 15 July 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

From 7 through 8 March 2024, Appellant was tried by a General Court-Martial composed of a military judge at Kunsan Air Base, Republic of Korea. R. at 1, 19; Entry of Judgment (EOJ). Appellant was convicted consistent with his pleas and pursuant to a plea agreement, of One Charge with Five Specifications of assault consummated by a battery, in violation of Article 128, Uniform Code of Military Justice (UCMJ); and One Charge with One Specification of child endangerment, in violation of Article 119b, UCMJ. R. at 21, 179, 207; Appellate Ex. III. The military judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, forfeit \$1000 pay per month for six months, confined for a period of 120 days, and a bad conduct discharge. R. at 340.

The record of trial consists of one e-ROT with two volumes, three Prosecution Exhibits, two Court Exhibits, six Defense Exhibits, and four Appellate Exhibits; the transcript is 341 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of this case.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel also provides the following information: Maj Grande is currently assigned 29 cases; 23 cases are pending before this Court (19 cases are pending AOE). Six cases have priority over the present case:

1. *United States v. Gale*, Crim. App. Dkt. No. 2025-01/ USCA Dkt. No. XX-XXXX-AF – Undersigned counsel is working with civilian counsel to draft the Supplement to the Petition for Grant of Review in this Art. 62, UCMJ case. Civilian counsel in this case filed a Motion for Enlargement of Time to file the Supplement, which is currently pending before the CAAF.
2. *United States v. Fundis*, No. ACM 40689- The record of trial consists of six volumes, with eight Prosecution Exhibits, two Court Exhibits, eighteen Defense Exhibits, and eighteen Appellate Exhibits. The transcript is 377 pages long. Undersigned counsel has completed her review of the record in this case, however civilian counsel is drafting the AOE in this case.
3. *United States v. Reese*, No. ACM 24069 – The record of trial consists of one E-ROT containing two volumes, with twelve Prosecution Exhibits, four Court Exhibits, fourteen Defense Exhibits, and fifty-six Appellate Exhibits. The transcript is 1,310 pages long. Appellant is not currently confined. Undersigned counsel is currently drafting the AOE in this case.



4. *United States v. Castillo*, No. ACM 40705 – The record of trial consists of seven volumes, with five Prosecution Exhibits, one Court Exhibit, one Defense Exhibit, and thirty-four Appellate Exhibits. The transcript is 470 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of the record for this case.
5. *United States v. Heilig*, No. ACM 40740 – The record of trials consists of one e-ROT with six volumes, three Prosecution Exhibits, eight Defense Exhibits, and six Appellate Exhibits; the transcript is 135 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of the record for this case.
6. *United States v. Cunningham*, No. ACM 40746 – The record of trial consists of ten volumes with twelve Prosecution Exhibits, one Court Exhibit, seven Defense Exhibits, and eighty-five Appellate Exhibits. The transcript is 1,249 pages long. Appellant is currently confined. Undersigned counsel has not yet completed her review of the record for this case.

Through no fault of Appellant, undersigned counsel has been unable to prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to prepare a brief for Appellant's case. Appellant was advised of his right to a timely appeal. Appellant has been provided an update on the status of undersigned counsel's progress on this case. Appellant was advised of the request for this enlargement of time. Appellant provided limited consent to disclose a confidential communication with counsel wherein Appellant consented to the request for this enlargement.

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

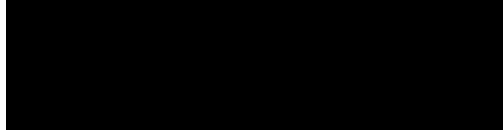
Respectfully submitted,



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
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1500 West Perimeter Road, Suite 1100  
Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
Email: [jordan.grande@us.af.mil](mailto:jordan.grande@us.af.mil)

## **CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 11 August 2025.



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
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Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
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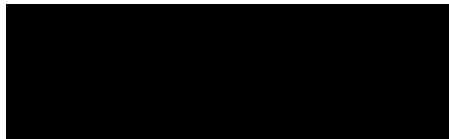
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
	)	OF TIME
v.	)	
	)	
	)	Before Panel No. 1
Technical Sergeant (E-6)	)	
<b>JACOB A. SEE,</b>	)	No. ACM S32805
United States Air Force,	)	
<i>Appellant.</i>	)	
	)	11 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 general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

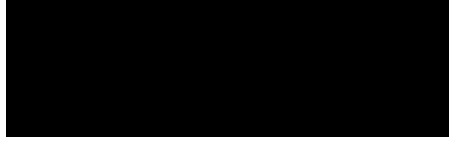
**WHEREFORE,** the United States respectfully requests that this Court deny Appellant's enlargement motion.



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 11 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,**

*Appellee,*

v.

Technical Sergeant (E-6)

**JACOB A. SEE,**

United States Air Force,

*Appellant.*

) **APPELLANT'S MOTION**

) **FOR ENLARGEMENT**

) **OF TIME (SEVENTH)**

)

) Before Panel No. 1

)

) No. ACM S32805

)

) 12 September 2025

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

Pursuant to Rule 23.3(m)(1) and (4) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **19 October 2025**.

Appellant's case was docketed with this Court on 23 December 2024. From the date of docketing to the present date, 263 days have elapsed. On the date requested, 300 days will have elapsed since docketing.

From 7 through 8 March 2024, Appellant was tried by a General Court-Martial composed of a military judge at Kunsan Air Base, Republic of Korea. R. at 1, 19; Entry of Judgment (EOJ). Appellant was convicted consistent with his pleas and pursuant to a plea agreement, of One Charge with Five Specifications of assault consummated by a battery, in violation of Article 128, Uniform Code of Military Justice (UCMJ); and One Charge with One Specification of child endangerment, in violation of Article 119b, UCMJ. R. at 21, 179, 207; Appellate Ex. III. The military judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, forfeit \$1000 pay per month for six months, confined for a period of 120 days, and a bad conduct discharge. R. at 340.

The record of trial consists of one e-ROT with two volumes, three Prosecution Exhibits, two Court Exhibits, six Defense Exhibits, and four Appellate Exhibits; the transcript is 341 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of this case.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel also provides the following information: Maj Grande is currently assigned 29 cases; 23 cases are pending before this Court (18 cases are pending AOE). Three cases have priority over the present case:

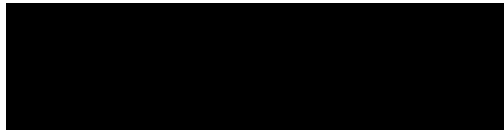
1. *United States v. Castillo*, No. ACM 40705 – The record of trial consists of seven volumes, with five Prosecution Exhibits, one Court Exhibit, one Defense Exhibit, and thirty-four Appellate Exhibits. The transcript is 470 pages long. Appellant is not currently confined. Undersigned counsel is drafting the AOE in this case.
2. *United States v. Heilig*, No. ACM 40740 – The record of trials consists of one e-ROT with six volumes, three Prosecution Exhibits, eight Defense Exhibits, and six Appellate Exhibits; the transcript is 135 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of the record for this case.
3. *United States v. Cunningham*, No. ACM 40746 – The record of trial consists of ten volumes with twelve Prosecution Exhibits, one Court Exhibit, seven Defense Exhibits, and eighty-five Appellate Exhibits. The transcript is 1,249 pages long. Appellant is currently confined. Undersigned counsel has completed her review of the record for this case.

Through no fault of Appellant, undersigned counsel has been unable to prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to prepare a brief for Appellant's case. Appellant was advised of his right to a timely appeal. Appellant has been

provided an update on the status of undersigned counsel's progress on this case. Appellant was advised of the request for this enlargement of time. Appellant provided limited consent to disclose a confidential communication with counsel wherein Appellant consented to the request for this enlargement.

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

Respectfully submitted,

A solid black rectangular box used to redact the signature of the undersigned counsel.

JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
1500 West Perimeter Road, Suite 1100  
Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
Email: jordan.grande@us.af.mil



## **CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 12 September 2025.



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
1500 West Perimeter Road, Suite 1100  
Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
Email: [jordan.grande@us.af.mil](mailto:jordan.grande@us.af.mil)

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

<b>UNITED STATES,</b>	)	UNITED STATES’
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT’S
	)	MOTION FOR ENLARGEMENT
	)	OF TIME
v.	)	
	)	
	)	Before Panel No. 1
Technical Sergeant (E-6)	)	
<b>JACOB A. SEE,</b>	)	No. ACM S32805
United States Air Force,	)	
<i>Appellant.</i>	)	
	)	15 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 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.

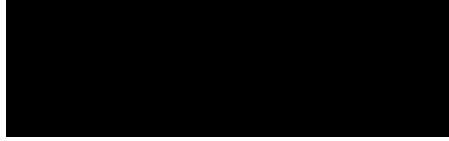
**WHEREFORE**, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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 15 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,**

*Appellee,*

V.

## Technical Sergeant (E-6)

**JACOB A. SEE,**

United States Air Force,

*Appellant.*

## **) APPELLANT'S MOTION**

## ) FOR ENLARGEMENT

**) OF TIME (EIGHTH)**

)

) Before Panel No. 1

)

) No. ACM S32805

)

) 12 October 2025

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

Pursuant to Rule 23.3(m)(1) and (4) and (6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **18 November 2025**.

Appellant's case was docketed with this Court on 23 December 2024. From the date of docketing to the present date, 293 days have elapsed. On the date requested, 330 days will have elapsed since docketing.

From 7 through 8 March 2024, Appellant was tried by a General Court-Martial composed of a military judge at Kunsan Air Base, Republic of Korea. R. at 1, 19; Entry of Judgment (EOJ). Appellant was convicted consistent with his pleas and pursuant to a plea agreement, of One Charge with Five Specifications of assault consummated by a battery, in violation of Article 128, Uniform Code of Military Justice (UCMJ); and One Charge with One Specification of child endangerment, in violation of Article 119b, UCMJ. R. at 21, 179, 207; Appellate Ex. III. The military judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, forfeit \$1000 pay per month for six months, confined for a period of 120 days, and a bad conduct discharge. R. at 340.

The record of trial consists of one e-ROT with two volumes, three Prosecution Exhibits, two Court Exhibits, six Defense Exhibits, and four Appellate Exhibits; the transcript is 341 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of this case.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel also provides the following information: Maj Grande is currently assigned 29 cases; 23 cases are pending before this Court (18 cases are pending AOE). Three cases have priority over the present case:

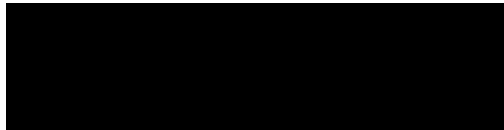
1. *United States v. Marcoux*, No. ACM 40705 – The record of trial consists of seven volumes, with five Prosecution Exhibits, one Court Exhibit, one Defense Exhibit, and thirty-four Appellate Exhibits. The transcript is 470 pages long. Appellant is currently confined. Undersigned counsel is currently drafting the AOE in this case.
2. *United States v. Heilig*, No. ACM 40740 – The record of trials consists of one e-ROT with six volumes, three Prosecution Exhibits, eight Defense Exhibits, and six Appellate Exhibits; the transcript is 135 pages long. Appellant is not currently confined. Undersigned counsel has completed her review of the record for this case.
3. *United States v. Cunningham*, No. ACM 40746 – The record of trial consists of ten volumes with twelve Prosecution Exhibits, one Court Exhibit, seven Defense Exhibits, and eighty-five Appellate Exhibits. The transcript is 1,249 pages long. Appellant is currently confined. Undersigned counsel has completed her review of the record for this case.

Through no fault of Appellant, undersigned counsel has been unable to prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to prepare a brief for Appellant's case. Appellant was advised of his right to a timely appeal. Appellant has been

provided an update on the status of undersigned counsel's progress on this case. Appellant was advised of the request for this enlargement of time. Appellant provided limited consent to disclose a confidential communication with counsel wherein Appellant consented to the request for this enlargement.

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

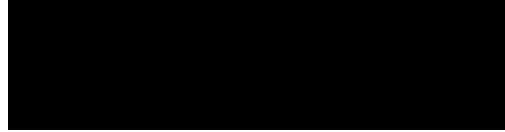
Respectfully submitted,

A solid black rectangular box used to redact the signature of the undersigned counsel.

JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
1500 West Perimeter Road, Suite 1100  
Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
Email: jordan.grande@us.af.mil

## **CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 12 October 2025.



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
1500 West Perimeter Road, Suite 1100  
Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
Email: jordan.grande@us.af.mil



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

<b>UNITED STATES,</b>	)	UNITED STATES'
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
	)	OF TIME
v.	)	
	)	
	)	Before Panel No. 1
Technical Sergeant (E-6)	)	
<b>JACOB A. SEE,</b>	)	No. ACM S32805
United States Air Force,	)	
<i>Appellant.</i>	)	
	)	14 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 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.

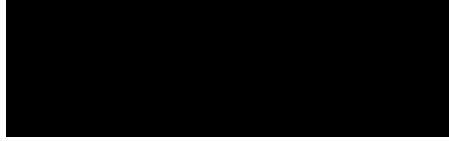
**WHEREFORE**, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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 14 October 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, ) APPELLANT’S MOTION  
Appellee, ) FOR ENLARGEMENT  
 ) OF TIME (NINTH)  
v. )  
 ) Before Panel No. 1  
Technical Sergeant (E-6) )  
JACOB A. SEE, ) No. ACM S32805  
United States Air Force, )  
Appellant. ) 12 November 2025

Pursuant to Rule 23.3(m)(1) and (4) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **18 December 2025**.

Appellant's case was docketed with this Court on 23 December 2024. From the date of docketing to the present date, 324 days have elapsed.<sup>1</sup> On the date requested, 360 days will have elapsed since docketing.

From 7 through 8 March 2024, Appellant was tried by a General Court-Martial composed of a military judge at Kunsan Air Base, Republic of Korea. R. at 1, 19; Entry of Judgment (EOJ).

<sup>1</sup> The filing of this Motion is timely in accordance with Rule 23.3(m)(1) of this Court’s Rules of Practice and Procedure. In accordance with JT. CT. CRIM. APP. R. 15 and Rule 15 of this Court’s Rules of Practice and Procedure, the seventh calendar day before this AOE is due is calculated as 12 November 2025 because 11 November 2025 was a holiday on which this Court was closed. This Court clarified its calculation of time in accordance with JT. CT. CRIM. APP. R. 15 in its 12 February 2025 Order in *United States v. Vongphachanh*, No. ACM 40741. In accordance with JT. CT. CRIM. APP. R. 15, when the last day of a period of time to be computed ends on “a Saturday, Sunday, holiday, or day on which the Court is closed,” that period of time, “runs until the end of the next day that is not a Saturday, Sunday, holiday, or day on which the Court is closed.” The last day of the period of time to be computed in this case (the seventh day before this AOE is due) was a holiday, and therefore, in accordance with JT. CT. CRIM. APP. R. 15 and Rule 15 of this Court’s Rules of Practice and Procedure, the end of that period runs until the next day this Court is not closed, which is 12 November 2025.

Appellant was convicted consistent with his pleas and pursuant to a plea agreement, of One Charge with Five Specifications of assault consummated by a battery, in violation of Article 128, Uniform Code of Military Justice (UCMJ); and One Charge with One Specification of child endangerment, in violation of Article 119b, UCMJ. R. at 21, 179, 207; Appellate Ex. III. The military judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, forfeit \$1000 pay per month for six months, confined for a period of 120 days, and a bad conduct discharge. R. at 340.

The record of trial consists of one e-ROT with two volumes, three Prosecution Exhibits, two Court Exhibits, six Defense Exhibits, and four Appellate Exhibits; the transcript is 341 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of this case.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel also provides the following information: Maj Grande is currently assigned 29 cases; 23 cases are pending before this Court (18 cases are pending AOE). Three cases have priority over the present case:

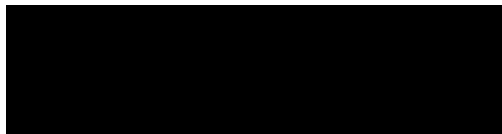
1. *United States v. Reese*, No. ACM 24069 – The record of trial consists of one E-ROT containing two volumes, with twelve Prosecution Exhibits, four Court Exhibits, fourteen Defense Exhibits, and fifty-six Appellate Exhibits. The transcript is 1310 pages long. Appellant is not currently confined. The Reply in this case is due 15 November 2025.
2. *United States v. Marcoux*, No. ACM 40705 – The record of trial consists of seven volumes, with five Prosecution Exhibits, one Court Exhibit, one Defense Exhibit, and thirty-four Appellate Exhibits. The transcript is 470 pages long. Appellant is currently confined. Undersigned counsel is currently drafting the AOE in this case.

3. *United States v. Cunningham*, No. ACM 40746 – The record of trial consists of ten volumes with twelve Prosecution Exhibits, one Court Exhibit, seven Defense Exhibits, and eighty-five Appellate Exhibits. The transcript is 1,249 pages long. Appellant is currently confined. Undersigned counsel has completed her review of the record for this case.

Through no fault of Appellant, undersigned counsel has been unable to prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to prepare a brief for Appellant's case. Appellant was advised of his right to a timely appeal. Appellant has been provided an update on the status of undersigned counsel's progress on this case. Appellant was advised of the request for this enlargement of time. Appellant provided limited consent to disclose a confidential communication with counsel wherein Appellant consented to the request for this enlargement.

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

Respectfully submitted,



JORDAN L. GRANDE, Maj, USAF  
Appellate Defense Counsel  
Air Force Appellate Defense Division  
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Joint Base Andrews NAF, MD 20762-6604  
Office: (240) 612-4770  
Email: jordan.grande@us.af.mil

## **CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 12 November 2025.



JORDAN L. GRANDE, Maj, USAF  
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**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

<b>UNITED STATES,</b>	)	UNITED STATES’
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT’S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Technical Sergeant (E-6)	)	Before Panel No. 1
<b>JACOB A. SEE,</b>	)	
United States Air Force,	)	No. ACM S32805
<i>Appellant.</i>	)	
	)	14 November 2025
	)	

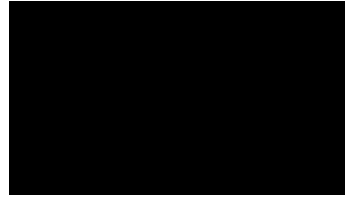
**TO THE HONORABLE, THE JUDGES OF  
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

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 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.



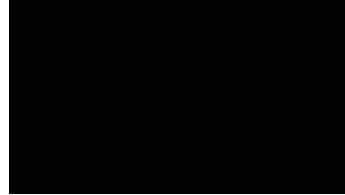
**WHEREFORE**, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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 14 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

**UNITED STATES,**  
*Appellee,*

v.

Technical Sergeant (E-6)  
**JACOB A. SEE,**  
United States Air Force,  
*Appellant.*

) **APPELLANT’S MOTION**  
) **FOR ENLARGEMENT**  
) **OF TIME (TENTH)**  
)  
) Before Panel No. 1  
)  
) No. ACM S32805  
)  
) 11 December 2025

Pursuant to Rule 23.3(m)(1) and (4) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **17 January 2026**.

Appellant's case was docketed with this Court on 23 December 2024. From the date of docketing to the present date, 353 days have elapsed. On the date requested, 390 days will have elapsed since docketing.

From 7 through 8 March 2024, Appellant was tried by a General Court-Martial composed of a military judge at Kunsan Air Base, Republic of Korea. R. at 1, 19; Entry of Judgment (EOJ). Appellant was convicted consistent with his pleas and pursuant to a plea agreement, of One Charge with Five Specifications of assault consummated by a battery, in violation of Article 128, Uniform Code of Military Justice (UCMJ); and One Charge with One Specification of child endangerment, in violation of Article 119b, UCMJ. R. at 21, 179, 207; Appellate Ex. III. The military judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, forfeit \$1000 pay per month for six months, confined for a period of 120 days, and a bad conduct discharge. R. at 340.

The record of trial consists of one e-ROT with two volumes, three Prosecution Exhibits, two Court Exhibits, six Defense Exhibits, and four Appellate Exhibits; the transcript is 341 pages long. Appellant is not currently confined. Undersigned counsel has not yet completed her review of this case.

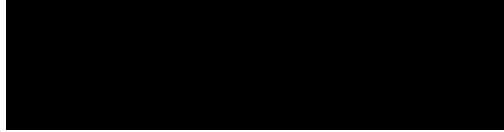
Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel also provides the following information: Maj Grande is currently assigned 22 cases; 17 cases are pending before this Court (10 cases are pending AOE). Two cases have priority over the present case:

1. *United States v. Marcoux*, No. ACM 40705 – The record of trial consists of seven volumes, with five Prosecution Exhibits, one Court Exhibit, one Defense Exhibit, and thirty-four Appellate Exhibits. The transcript is 470 pages long. Appellant is currently confined. The AOE in this case is currently being reviewed.
2. *United States v. Cunningham*, No. ACM 40746 – The record of trial consists of ten volumes with twelve Prosecution Exhibits, one Court Exhibit, seven Defense Exhibits, and eighty-five Appellate Exhibits. The transcript is 1,249 pages long. Appellant is currently confined. Undersigned counsel is currently drafting the AOE this case.

Through no fault of Appellant, undersigned counsel has been unable to prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to prepare a brief for Appellant's case. Appellant was advised of his right to a timely appeal. Appellant has been provided an update on the status of undersigned counsel's progress on this case. Appellant was advised of the request for this enlargement of time. Appellant provided limited consent to disclose a confidential communication with counsel wherein Appellant consented to the request for this enlargement.

**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 Air Force Government Trial and Appellate Operations Division on 11 December 2025.



JORDAN L. GRANDE, Maj, USAF  
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**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

<b>UNITED STATES,</b>	)	UNITED STATES’
	)	OPPOSITION TO
<i>Appellee,</i>	)	APPELLANT’S MOTION FOR
	)	ENLARGEMENT OF TIME
v.	)	
	)	Before Panel No. 1
Technical Sergeant (E-6)	)	
<b>JACOB A. SEE,</b>	)	No. ACM S32805
United States Air Force.	)	
<i>Appellant</i>	)	15 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 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 more than 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.

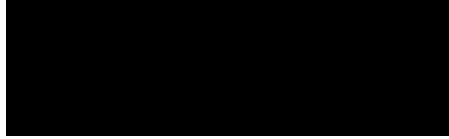


VANESSA BAIROS, Maj, USAF  
Appellate Government Counsel  
Government Trial & Appellate Operations Division  
Military Justice and Discipline Directorate  
United States Air Force  
(240) 612-4800



**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 December 2025.



VANESSA BAIROS, Maj, USAF  
Appellate Government Counsel  
Government Trial & Appellate Operations Division  
Military Justice and Discipline Directorate  
United States Air Force  
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**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	<b>APPELLANT’S MOTION TO</b>
<i>Appellee,</i>	)	<b>WITHDRAW REVIEW FROM</b>
	)	<b>APPELLATE AND ATTACH</b>
v.	)	
	)	Before Panel No. 1
Technical Sergeant (E-6)	)	
<b>JACOB A. SEE</b>	)	No. ACM S32805
United States Air Force,	)	
<i>Appellant.</i>	)	20 January 2026

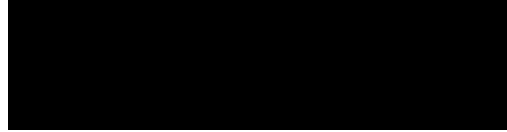
**TO THE HONORABLE, THE JUDGES OF THE  
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 16 of the Rules of Practice and Procedure of the United States Air Force Court of Criminal Appeals and Rule for Courts-Martial (R.C.M.) 1115, Appellant moves to withdraw his case from appellate review. Appellant has fully consulted with Major Jordan Grande, his appellate defense counsel, regarding this motion to withdraw. No person has compelled, coerced, or induced Appellant by force, promises of clemency, or otherwise, to withdraw his case from appellate review.

Further, pursuant to Rules 23(b) and 23.3(b), undersigned counsel asks this Court to attach the two-page document appended to this pleading to the record of this proceeding. The appended document, Appellant’s completed DD Form 2330, *Waiver/Withdrawal of Appellate Rights in General and Special Courts-Martial Subject to Review by a Court of Criminal Appeals*, is necessary to comply with R.C.M. 1115(d) and Rule 16.1 of this Court’s Rules of Practice and Procedure.

**WHEREFORE**, Appellant respectfully requests that this Court grant this motion to withdraw from appellate review and attach matters to the record.

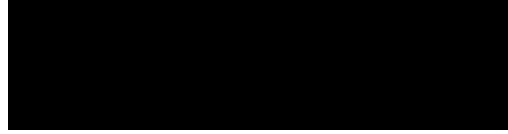
Respectfully submitted,



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