

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

UNITED STATES)	No. ACM 40791
<i>Appellee</i>)	
)	
v.)	
)	NOTICE OF PANEL CHANGE
Keith A. COOPER, Jr.)	
Airman First Class (E-3))	
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That the Record of Trial in the above-styled matter is withdrawn from Panel 3 and referred to Panel 1 for appellate review.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



Chief Commissioner

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

UNITED STATES)	No. ACM 40791
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Keith A. COOPER JR.)	
Airman First Class (E-3))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 1

On 19 May 2025, counsel for Appellant submitted a Motion for Enlargement of Time (First), requesting an additional 60 days to submit Appellant's assignments of error. The Government generally opposed 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 21st day of May, 2025,

ORDERED:

Appellant's Motion for Enlargement of Time (First) is **GRANTED**. Appellant shall file any assignments of error not later than **1 August 2025**.

Each request for an enlargement of time will be considered on its merits. 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

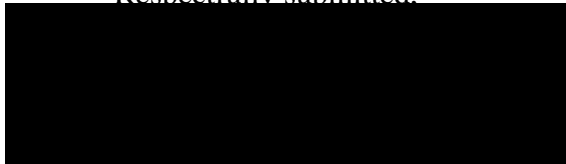
UNITED STATES,)	APPELLANT’S MOTION
<i>Appellee,</i>)	FOR ENLARGEMENT
)	OF TIME (FIRST)
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER, JR.,)	No. ACM 40791
United States Air Force,)	
<i>Appellant.</i>)	19 May 2025

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

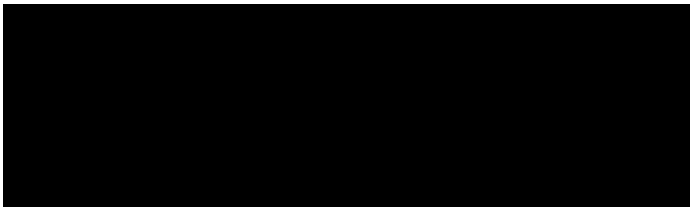
Pursuant to Rule 23.3(m)(1) and (2) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for his first enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 60 days, which will end on **1 August 2025**. The record of trial was docketed with this Court on 3 April 2025. From the date of docketing to the present date, 46 days have elapsed. On the date requested, 120 days will have elapsed.

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

Respectfully submitted,

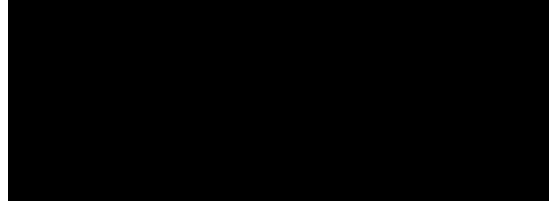


SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel

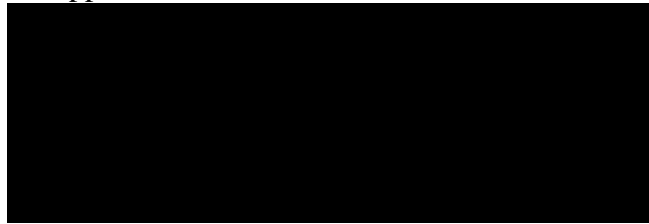


CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 19 May 2025.



SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel



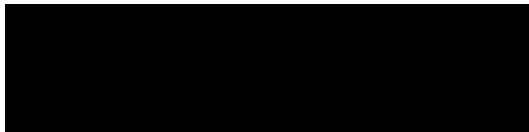
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER, JR.,)	No. ACM 40791
United States Air Force,)	
<i>Appellant.</i>)	
)	20 May 2025

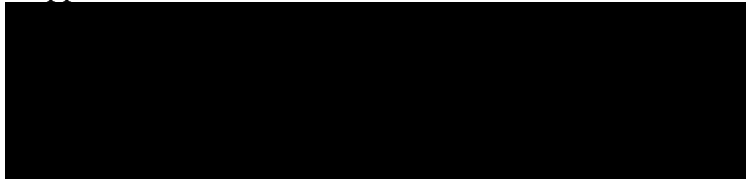
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

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

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

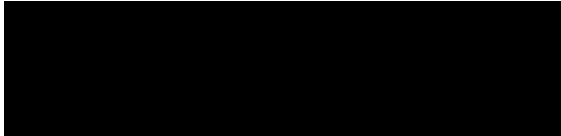


VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



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 20 May 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	APPELLANT’S MOTION
<i>Appellee,</i>)	FOR ENLARGEMENT
)	OF TIME (SECOND)
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER JR.,)	No. ACM 40791
United States Air Force,)	
<i>Appellant.</i>)	21 July 2025

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

Pursuant to Rule 23.3(m)(3) and (4) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **31 August 2025**. The record of trial was docketed with this Court on 3 April 2025. From the date of docketing to the present date, 109 days have elapsed. On the date requested, 150 days will have elapsed.

On 2 October 2024, at Cannon Air Force Base, New Mexico, a general court-martial composed of officer and enlisted members found Appellant guilty, contrary to his pleas, of one specification¹ of attempted sexual assault of child, in violation of Article 80, Uniform Code of Military Justice (UCMJ). R. at 1, 53, 55, 59, 510. The military judge sentenced Appellant to be reprimanded, to be reduced to the grade of E-1, to be confined for one year, and to be discharged with a dishonorable discharge. R. at 512, 549. The convening authority took no action on the find



GRANTED
22 JULY 2025

¹ The defense made a motion for unreasonable multiplication of charges, which resulted in the military judge merging “what was previously Specifications 1 and 2 into a single specification.” R. at 53 (referencing Appellate Ex. XXVI).

The trial transcript is 549 pages long. The electronic record of trial contains seven Prosecution Exhibits, three Defense Exhibits, and forty Appellate Exhibits. Appellant is not currently confined.

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

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

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

Respectfully submitted,



SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

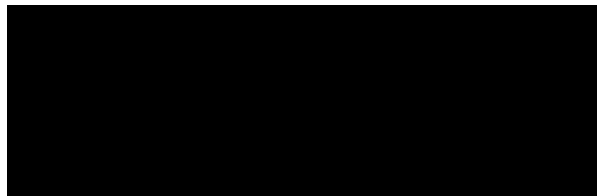


CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 21 July 2025.



SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel



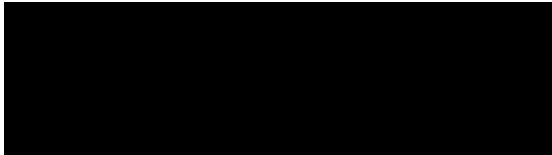
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER, JR.,)	No. ACM 40791
United States Air Force,)	
<i>Appellant.</i>)	
)	21 July 2025

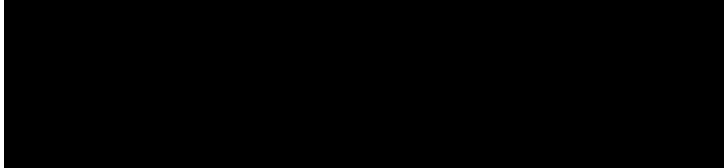
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

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

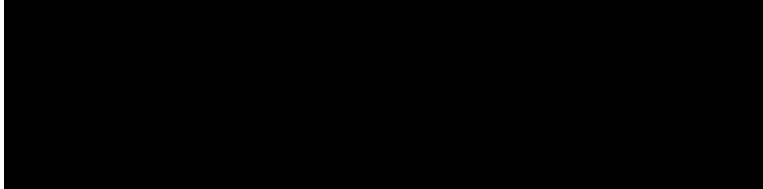


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 21 July 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	APPELLANT’S MOTION
<i>Appellee,</i>)	FOR ENLARGEMENT
)	OF TIME (THIRD)
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER JR.,)	No. ACM 40791
United States Air Force,)	
<i>Appellant.</i>)	17 August 2025

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

Pursuant to Rule 23.3(m)(3) and (4) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **30 September 2025**. The record of trial was docketed with this Court on 3 April 2025. From the date of docketing to the present date, 136 days have elapsed. On the date requested, 180 days will have elapsed.

On 2 October 2024, at Cannon Air Force Base, New Mexico, a general court-martial composed of officer and enlisted members found Appellant guilty, contrary to his pleas, of one specification¹ of attempted sexual assault of child, in violation of Article 80, Uniform Code of Military Justice (UCMJ). R. at 1, 53, 55, 59, 510. The military judge sentenced Appellant to be reprimanded, to be reduced to the grade of E-1, to be confined for one year, and to be discharged with a dishonorable discharge. R. at 512, 549. The convening authority took no action on the findings or the sentence. Convening Authority Decision on Action (Oct. 28, 2024).



_____ made a motion for unreasonable multiplication of charges, which resulted in the merging “what was previously Specifications 1 and 2 into a single specification.” R. at 55 (referencing Appellate Ex. XXVI).

GRANTED
21 AUG 2025

The trial transcript is 549 pages long. The electronic record of trial contains seven Prosecution Exhibits, three Defense Exhibits, and forty Appellate Exhibits. Appellant is not currently confined.

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

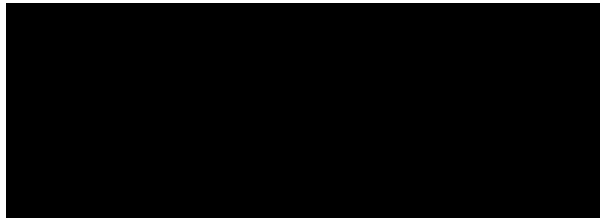
Through no fault of Appellant, undersigned counsel has been unable complete her review of Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise him regarding potential errors.

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

Respectfully submitted,

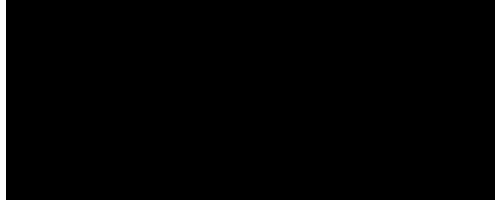


SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 17 August 2025.



SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



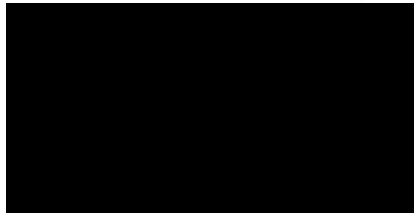
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Airman First Class (E-3))	Before Panel No. 1
KEITH A. COOPER JR.,)	
United States Air Force,)	No. ACM 40791
<i>Appellant.</i>)	
)	19 August 2025
)	

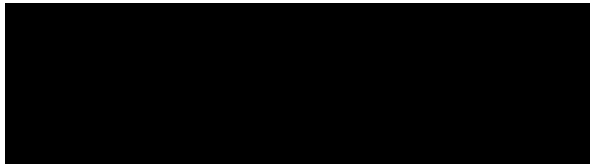
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

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.

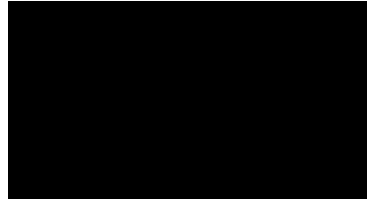


KATE E. LEE, Maj, USAF
Appellate Government Counsel

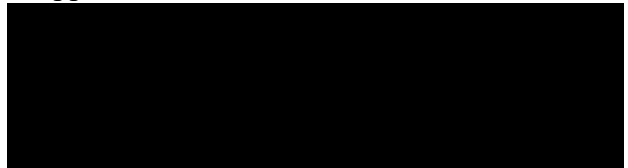


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 19 August 2025.



KATE E. LEE, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	APPELLANT’S MOTION
<i>Appellee,</i>)	FOR ENLARGEMENT
)	OF TIME (FOURTH)
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER JR.,)	No. ACM 40791
United States Air Force,)	
<i>Appellant.</i>)	18 September 2025

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

Pursuant to Rule 23.3(m)(3) and (6) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **30 October 2025**. The record of trial was docketed with this Court on 3 April 2025. From the date of docketing to the present date, 168 days have elapsed. On the date requested, 210 days will have elapsed.

On 2 October 2024, at Cannon Air Force Base, New Mexico, a general court-martial composed of officer and enlisted members found Appellant guilty, contrary to his pleas, of one specification¹ of attempted sexual assault of child, in violation of Article 80, Uniform Code of Military Justice (UCMJ). R. at 1, 53, 55, 59, 510. The military judge sentenced Appellant to be reprimanded, to be reduced to the grade of E-1, to be confined for one year, and to be discharged honorable discharge. R. at 512, 549. The convening authority took no action on the the sentence. Convening Authority Decision on Action (Oct. 28, 2024).



GRANTED
24 SEP 2025

¹ The defense made a motion for unreasonable multiplication of charges, which resulted in the military judge merging “what was previously Specifications 1 and 2 into a single specification.” R. at 53 (referencing Appellate Ex. XXVI).

The trial transcript is 549 pages long. The electronic record of trial contains seven Prosecution Exhibits, three Defense Exhibits, and forty Appellate Exhibits. Appellant is not currently confined.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information. Undersigned counsel is currently assigned 21 cases; 12 cases are pending before this Court (7 cases are pending AOE), 6 cases are pending before the United States Court of Appeals for the Armed Forces (CAAF) (two cases are pending action on petitions for reconsideration; one is pending a petition for a grant of review and supplement), and 3 cases are pending before the Supreme Court of the United States (all pending filing an individual petition for a writ of certiorari). Within the next month, two more cases are anticipated to move from pending at the CAAF to pending before the Supreme Court. These clients will also have individualized petitions for writs of certiorari. To date, undersigned counsel has eight cases prioritized over the present case:

1. *United States v. Kristopik*, No. ACM 40674 - The trial transcript is 1,311 pages long. The electronic record of trial contains 10 Prosecution Exhibits, 20 Defense Exhibits, 118 Appellate Exhibits, and one Court Exhibit. This appellant is not currently confined. Undersigned has not yet completed her review of the record of trial. However, civilian appellate defense counsel has completed review and drafted an AOE. This appellant has not waived undersigned counsel's review of the record, and thus undersigned counsel intends to review this record as soon as possible. This AOE is due 7 October 2025. However, due to the Government filing a petition for reconsideration at the CAAF in *United States v. Folts*, USCA Dkt. No. 25-0043/AF, and a motion for reconsideration at this Court in *United States v. Kim*, No. ACM 24007, 2025 LX 340225 (A.F.

Ct. Crim. App. Aug. 15, 2025), undersigned counsel's review of this record has been disrupted and delayed.

2. *United States v. Tyson*, No. ACM 40617 – The Government's answer to this appellant's AOE is due in early October. Undersigned counsel anticipates working a reply brief upon the Government filing its answer.

3. *United States v. Baumgartner*, Application No. 25A241 (before the Supreme Court) – The CAAF denied review of this case on 20 June 2025. This case is now pending a one-issue petition for a writ of certiorari before the Supreme Court. The petition is due 17 November 2025, but the filing must be completely drafted and formatted at least two weeks beforehand to ensure it is printed by an outside agency on time. Thus, realistically, this petition must be complete by the end of October 2025. This appellant was previously represented by a civilian counsel, but before the Supreme Court, undersigned counsel is his only representation.

4. *United States v. English*, No. ACM 40703 - The record of trial is seven volumes consisting of five admitted Prosecution Exhibits, 15 Defense Exhibits, 32 Appellate Exhibits, and two Court Exhibits. The transcript is 546 pages. This appellant is not currently confined. Undersigned counsel has not yet completed her review of the record of trial.

5. *United States v. Fortune*, No. ACM S32800 - The trial transcript is 102 pages long. The electronic record of trial contains four Prosecution Exhibits, seven Defense Exhibits, and six Appellate Exhibits. This appellant is not currently confined. Undersigned counsel has not yet completed her review of the record of trial.

6. *United States v. Culbreth*, No. ACM 40704 - The trial transcript is 103 pages long and the record of trial is electronic, which is one volume of 513 pages. There are two Prosecution Exhibits, nineteen Defense Exhibits, nine Appellate Exhibits, and two Court Exhibits. This

appellant is currently confined. Undersigned counsel has not yet completed her review of the record of trial.

7. *United States v. Buckley*, No. ACM 40764 - The trial transcript is 1,636 pages long. The electronic record of trial contains 13 Prosecution Exhibits, 30 Defense Exhibits, and 65 Appellate Exhibits. This appellant is not currently confined. Undersigned counsel has not yet completed her review of the record of trial.

8. *United States v. Chatman*, No. ACM 40779 - The trial transcript is 965 pages long. The electronic record of trial contains 14 Prosecution Exhibits, 6 Defense Exhibits, and 46 Appellate Exhibits. This appellant is currently confined. Neither undersigned counsel nor the civilian appellate defense counsel in this case have completed their review of the record of trial.

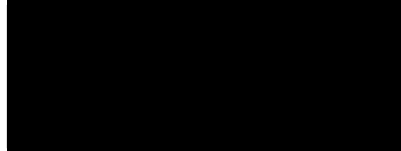
On top of these eight priorities, undersigned counsel also anticipates filing five other petitions for a writ of certiorari before the Supreme Court before the end of the year. Due to the expected deadlines for each petition, undersigned counsel anticipates five more cases will take priority over Appellant's case between now and December.

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

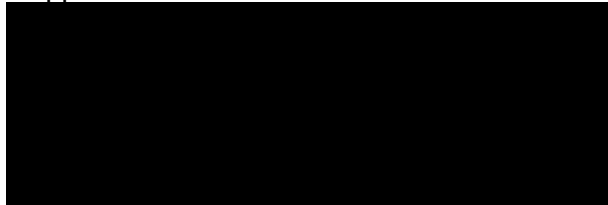
Through no fault of Appellant, undersigned counsel has been unable complete her review of Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise him regarding potential errors.

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

Respectfully submitted,

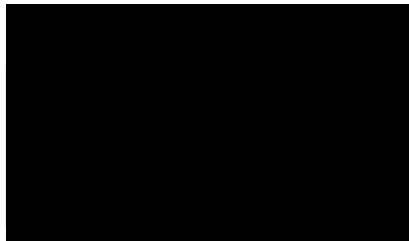


SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel

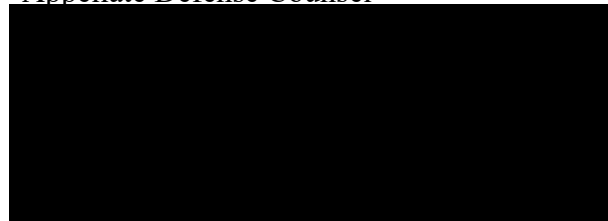


CERTIFICATE OF FILING AND SERVICE

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SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel



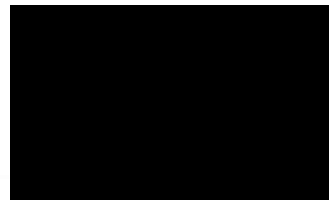
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Airman First Class (E-3))	Before Panel No. 1
KEITH A. COOPER JR.,)	
United States Air Force,)	No. ACM 40791
<i>Appellant.</i>)	
)	22 September 2025
)	

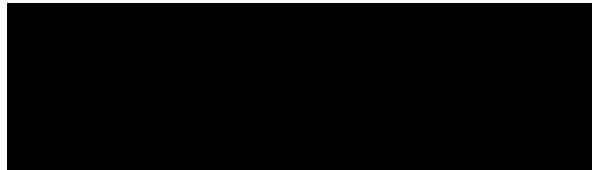
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

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

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

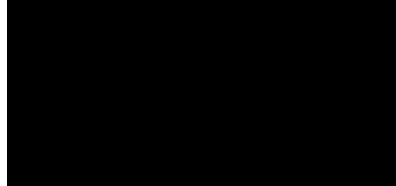


KATE E. LEE, Maj, USAF
Appellate Government Counsel

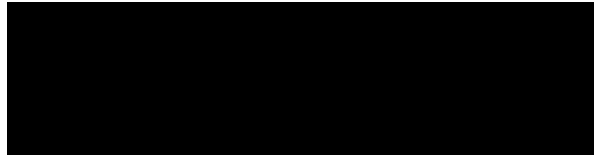


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 22 September 2025.



KATE E. LEE, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	APPELLANT’S MOTION
<i>Appellee,</i>)	FOR ENLARGEMENT
)	OF TIME (FIFTH)
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER JR.,)	No. ACM 40791
United States Air Force,)	
<i>Appellant.</i>)	18 October 2025

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

Pursuant to Rule 23.3(m)(3) and (6) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **29 November 2025**. The record of trial was docketed with this Court on 3 April 2025. From the date of docketing to the present date, 198 days have elapsed. On the date requested, 240 days will have elapsed.

On 2 October 2024, at Cannon Air Force Base, New Mexico, a general court-martial composed of officer and enlisted members found Appellant guilty, contrary to his pleas, of one specification¹ of attempted sexual assault of child, in violation of Article 80, Uniform Code of Military Justice (UCMJ). R. at 1, 53, 55, 59, 510. The military judge sentenced Appellant to be reprimanded, to be reduced to the grade of E-1, to be confined for one year, and to be discharged with a dishonorable discharge. R. at 512, 549. The convening authority took no action on the findings or the sentence. Convening Authority Decision on Action (Oct. 28, 2024).

defense made a motion for unreasonable multiplication of charges, which resulted in the military judge merging “what was previously Specifications 1 and 2 into a single specification.” R. at 3 (referencing Appellate Ex. XXVI).



GRANTED
21 OCT 2025

The trial transcript is 549 pages long. The electronic record of trial contains seven Prosecution Exhibits, three Defense Exhibits, and forty Appellate Exhibits. Appellant is not currently confined.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information. Undersigned counsel is currently assigned 21 cases; 8 cases are pending before this Court (7 cases are pending AOE), 7 cases are pending before the United States Court of Appeals for the Armed Forces (CAAF) (2 cases are pending petitions for a grant of review and their respective supplements; 2 cases are pending client consultation on appealing further), and 6 cases are pending before the Supreme Court of the United States (5 cases are pending filing an individual petition for a writ of certiorari; 1 case is pending client consultation on appealing further). To date, undersigned counsel has twelve cases prioritized over the present case:

1. *United States v. Kristopik*, No. ACM 40674 – Undersigned counsel finished her review of this record, which contained a 1,311-page transcript, 10 Prosecution Exhibits, 20 Defense Exhibits, 118 Appellate Exhibits, and one Court Exhibit. This appellant is not currently confined. Undersigned counsel is currently working with civilian counsel to complete the AOE, due to this Court by 24 October 2025.

2. *United States v. Tyson*, No. ACM 40617 – The Government’s answer to this appellant’s AOE is due on 28 October 2025. Undersigned counsel anticipates working a reply brief upon receiving the Government’s answer.

3. *United States v. Baumgartner*, Application No. 25A241 (before the Supreme Court) – The CAAF denied review of this case on 20 June 2025. This case is now pending a one-issue, joint petition for a writ of certiorari before the Supreme Court. This appellant was previously represented by a civilian counsel, but before the Supreme Court, undersigned counsel is his only

representation.² While this is a joint petition, undersigned counsel is the lead attorney for drafting the petition. From the date of the decision, this appellant has 90 days to file a petition for a writ of certiorari to the Supreme Court. 28 U.S.C. § 1259(3); Supreme Court Rule 13(1). Due to various other case priorities, to include cases pending before this Court, undersigned counsel requested a 60-day extension. Supreme Court Rule 13(5). The Chief Justice granted an extension on the filing deadline to 17 November 2025. To meet this deadline, undersigned counsel must complete the petition before the end of October 2025 because it takes about two weeks to meet the booklet printing requirements of the Supreme Court. Supreme Court Rules 12, 33.

4. *United States v. Marin Perez*, USCA Dkt. No. 25-0238/AF – On 16 October 2025, the CAAF granted one issue in this case. The grant brief is currently due 6 November 2025.

5. *United States v. Johnson*, Application No. 25A339 (before the Supreme Court) – This appellant’s petition is due to the Supreme Court on 11 December 2025. As with *Baumgartner*, a 60-day extension was already requested. This is a one-issue petition on an issue that was not fully briefed in the case, but developed while the appellant’s case was on appeal. Undersigned counsel is the only counsel working on this petition. To meet the filing deadline at the Supreme Court, this petition must be drafted, reviewed, and formatted before Thanksgiving 2025. Undersigned counsel will be on leave from 25 November to 2 December 2025, necessitating reprioritization of this case due to Supreme Court formatting and printing constraints.

² Appellate review “spans a continuum of process” where an appellant has the right to effective representation through the entire period of review, from the end of trial to a decision by the Supreme Court. *See Diaz v. JAG of the Navy*, 59 M.J. 34, 37 (C.A.A.F. 2003) (articulating this right to representation up to the CAAF); 28 U.S.C. § 1259 (codifying an appellant’s right to seek review at the Supreme Court); 10 U.S.C. § 870 (codifying an appellant’s right to have free military appellate defense counsel representation at the Supreme Court). There is no break in counsel at each phase of review; an appellant is entitled to counsel through the entire period. *Diaz*, 59 M.J. at 37.

6. *United States v. Dominguez-Garcia*, Application No. 25A340 (before the Supreme Court) – This appellant’s petition is due to the Supreme Court on 19 December 2025. As with *Baumgartner*, a 60-day extension was already requested. This is a joint petition on one issue that has been partially briefed in another case pending before the Supreme Court. However, there are multiple servicemembers’ appeals in this petition, which requires fact-specific analyses and tailoring. Undersigned counsel is lead counsel for this joint petition and shoulders the responsibility of drafting. Most of the formatting is already complete. To meet the filing deadline at the Supreme Court, this petition must be drafted, reviewed, and formatted before Thanksgiving 2025 due to undersigned counsel’s leave from 25 November to 2 December 2025.

7. *United States v. Folts* (pending docketing number before the Supreme Court) – This appellant’s petition is due to the Supreme Court on 23 December 2025. No extension request has occurred in this case, although another petitioner is joining this case. That petitioner requested a 60-day extension for the specific purpose of joining his case with *Folts*. Thus, due the other petitioner’s extension, there will not be an extension request in this case. *See* Supreme Court Rule 13(5) (disfavoring extensions to begin with and not contemplating multiple extensions). Undersigned counsel is one of three attorneys working on this petition, and the anticipated issue has been previously briefed. To meet the filing deadline at the Supreme Court, undersigned counsel’s role in drafting and assisting on this petition must be complete before Thanksgiving 2025.

8. *United States v. Casillas* (pending docketing number before the Supreme Court) – This appellant’s brief is due to the Supreme Court on 25 December 2025. No extension request has occurred in this case, nor is one anticipated at this time. This is a companion case to *Johnson*, but it is not a joint petition. The same issue will be raised in this appellant’s case, but tailored to the

facts. Undersigned counsel is the sole counsel for this petition. To meet the filing deadline at the Supreme Court, this petition must be drafted, reviewed, and formatted before 11 December 2025, although undersigned counsel is aiming for earlier, if feasible.

9. *United States v. English*, No. ACM 40703 - The record of trial is seven volumes consisting of five admitted Prosecution Exhibits, 15 Defense Exhibits, 32 Appellate Exhibits, and two Court Exhibits. The transcript is 546 pages. This appellant is not currently confined. Undersigned counsel has not yet completed her review of the record of trial.

10. *United States v. Culbreth*, No. ACM 40704 - The trial transcript is 103 pages long and the record of trial is electronic, which is one volume of 513 pages. There are two Prosecution Exhibits, nineteen Defense Exhibits, nine Appellate Exhibits, and two Court Exhibits. This appellant is currently confined. Undersigned counsel has not yet completed her review of the record of trial.

11. *United States v. Buckley*, No. ACM 40764 - The trial transcript is 1,636 pages long. The electronic record of trial contains 13 Prosecution Exhibits, 30 Defense Exhibits, and 65 Appellate Exhibits. This appellant is not currently confined. Undersigned counsel has not yet completed her review of the record of trial.

12. *United States v. Chatman*, No. ACM 40779 - The trial transcript is 965 pages long. The electronic record of trial contains 14 Prosecution Exhibits, 6 Defense Exhibits, and 46 Appellate Exhibits. This appellant is currently confined. Neither undersigned counsel nor the civilian appellate defense counsel in this case have completed their review of the record of trial.

Appellant was advised of his right to a timely appeal. Appellant has been provided an update of the status of counsel's progress on his case. Appellant was advised of the request for this

enlargement of time. Appellant has provided limited consent to disclose a confidential communication with counsel wherein he consented to the request for this enlargement of time.

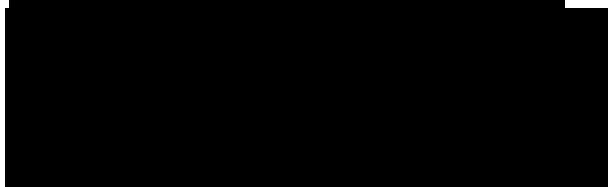
Through no fault of Appellant, undersigned counsel has been unable complete her review of Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise him regarding potential errors.

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

Respectfully submitted,

A large black rectangular redaction box covering the signature of Samantha M. Castanién.

SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel

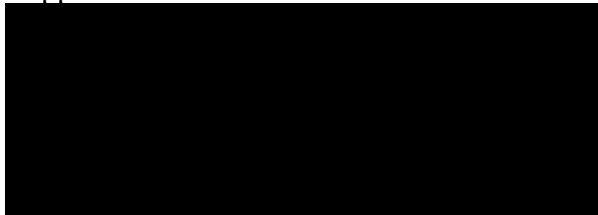
A large black rectangular redaction box covering the contact information of Samantha M. Castanién.

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 Air Force Government Trial and Appellate Operations Division on 18 October 2025.



SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel



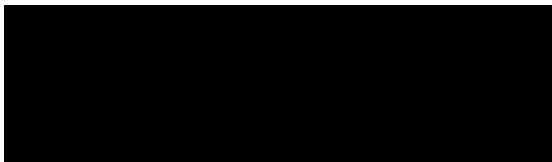
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
Airman First Class (E-3))	Before Panel No. 1
KEITH A. COOPER JR.,)	No. ACM 40791
United States Air Force,)	
<i>Appellant.</i>)	20 October 2025

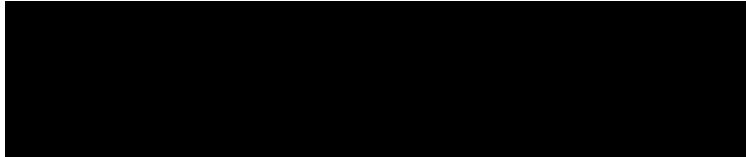
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

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

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

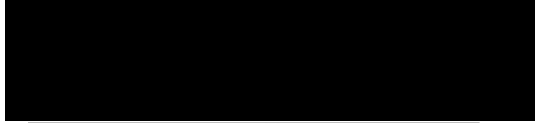


VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 20 October 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

<p>UNITED STATES, <i>Appellee,</i></p> <p>v.</p> <p>Airman First Class (E-3) KEITH A. COOPER JR., United States Air Force, <i>Appellant.</i></p>	<p>) APPELLANT’S MOTION) FOR ENLARGEMENT) OF TIME (SIXTH))) Before Panel No. 1)) No. ACM 40791)) 16 November 2025</p>
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**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES
AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) and (6) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **29 December 2025**. The record of trial was docketed with this Court on 3 April 2025. From the date of docketing to the present date, 227 days have elapsed. On the date requested, 270 days will have elapsed.

On 2 October 2024, at Cannon Air Force Base, New Mexico, a general court-martial composed of officer and enlisted members found Appellant guilty, contrary to his pleas, of one specification¹ of attempted sexual assault of child, in violation of Article 80, Uniform Code of Military Justice (UCMJ). R. at 1, 53, 55, 59, 510. The military judge sentenced Appellant to be reduced to the grade of E-1, to be confined for one year, and to be discharged with an honorable discharge. R. at 512, 549. The convening authority took no action on the findings of the sentence. Convening Authority Decision on Action (Oct. 28, 2024).



GRANTED

18 Nov 2025

¹ The defense made a motion for unreasonable multiplication of charges, which resulted in the military judge merging “what was previously Specifications 1 and 2 into a single specification.” R. at 53 (referencing Appellate Ex. XXVI).

The trial transcript is 549 pages long. The electronic record of trial contains seven Prosecution Exhibits, three Defense Exhibits, and forty Appellate Exhibits. Appellant is not currently confined.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information. Undersigned counsel is currently assigned 21 cases; 9 cases are pending before this Court (8 cases are pending AOE's), 6 cases are pending before the United States Court of Appeals for the Armed Forces (CAAF) (2 cases are pending petitions for a grant of review and their respective supplements; 1 case is pending grant briefing), and 6 cases are pending before the Supreme Court of the United States (4 cases are pending filing an individual petition for a writ of certiorari; 1 case is pending client consultation on appealing further). To date, undersigned counsel has ten cases prioritized over the present case:

1. *United States v. Kristopik*, No. ACM 40674 – This Court rejected the ten-issue, 73-page, 22,839-word AOE filed for this case because the motion to exceed the word count and page limit, identical to other motions filed previously, lacked good cause. Since the rejection, undersigned counsel coordinated with civilian counsel, drafted, and routed for review a motion for reconsideration with suggestion for en banc reconsideration in this case (filed 7 November 2025). This motion went unopposed by the Government and remains pending before this Court. Because this AOE was rejected, the new deadline is 18 November 2025, and, as such, this case remains prioritized over Appellant's.

2. *United States v. Marin Perez*, USCA Dkt. No. 25-0238/AF – On 16 October 2025, the CAAF granted one issue in this case. Undersigned counsel requested an extension, which was granted. The grant brief is now due 24 November 2025.

3. *United States v. Johnson*, Application No. 25A339 (before the Supreme Court) – This appellant’s petition is due to the Supreme Court on 11 December 2025. A 60-day extension was already requested. This is a one-issue petition on an issue that was not fully briefed in the case, but developed while the appellant’s case was on appeal. Undersigned counsel is the only counsel working on this petition. To meet the filing deadline at the Supreme Court, this petition must be drafted, reviewed, and formatted before Thanksgiving 2025. Undersigned counsel will be on leave from 25 November to 2 December 2025, necessitating reprioritization of this case due to Supreme Court formatting and printing constraints.

4. *United States v. Casillas* (pending docketing number before the Supreme Court) – This appellant’s brief is due to the Supreme Court on 25 December 2025. No extension request has occurred in this case, nor is one anticipated at this time. This is a companion case to *Johnson*, and may evolve into a joint petition. Undersigned counsel is the sole counsel for this petition. To meet the filing deadline at the Supreme Court, if *Casillas* joins with *Johnson*, this petition must be drafted, reviewed, and formatted before 24 November 2025.

5. *United States v. Dominguez-Garcia*, Application No. 25A340 (before the Supreme Court) – This appellant’s petition is due to the Supreme Court on 19 December 2025. A 60-day extension was already requested. This is a joint petition on one issue that has been partially briefed in another case pending before the Supreme Court. However, there are multiple servicemembers’ appeals in this petition, which requires fact-specific analyses and tailoring. Undersigned counsel is lead counsel for this joint petition and shoulders the responsibility of drafting. Most of the formatting is already complete. To meet the filing deadline at the Supreme Court, this petition must be drafted, reviewed, and formatted before Thanksgiving 2025 due to undersigned counsel’s leave from 25 November to 2 December 2025.

6. *United States v. Folts* (pending docketing number before the Supreme Court) – This appellant’s petition is due to the Supreme Court on 23 December 2025. No extension request has occurred in this case, although another petitioner is joining this case. That petitioner requested a 60-day extension for the specific purpose of joining his case with *Folts*. Thus, due to the other petitioner’s extension, there will not be an extension request in this case. *See* Supreme Court Rule 13(5) (disfavoring extensions to begin with and not contemplating multiple extensions). Undersigned counsel is one of three attorneys working on this petition, and the anticipated issue has been previously briefed. To meet the filing deadline at the Supreme Court, undersigned counsel’s role in drafting and assisting on this petition must be complete before Thanksgiving 2025.

7. *United States v. English*, No. ACM 40703 - The record of trial is seven volumes consisting of five admitted Prosecution Exhibits, 15 Defense Exhibits, 32 Appellate Exhibits, and two Court Exhibits. The transcript is 546 pages. This appellant is not currently confined. Undersigned counsel has not yet completed her review of the record of trial.

8. *United States v. Culbreth*, No. ACM 40704 - The trial transcript is 103 pages long and the record of trial is electronic, which is one volume of 513 pages. There are two Prosecution Exhibits, nineteen Defense Exhibits, nine Appellate Exhibits, and two Court Exhibits. This appellant is currently confined. Undersigned counsel has not yet completed her review of the record of trial.

9. *United States v. Buckley*, No. ACM 40764 - The trial transcript is 1,636 pages long. The electronic record of trial contains 13 Prosecution Exhibits, 30 Defense Exhibits, and 65 Appellate Exhibits. This appellant is not currently confined. Undersigned counsel has not yet completed her review of the record of trial.

10. *United States v. Chatman*, No. ACM 40779 - The trial transcript is 965 pages long. The electronic record of trial contains 14 Prosecution Exhibits, 6 Defense Exhibits, and 46 Appellate Exhibits. This appellant is currently confined. Neither undersigned counsel nor the civilian appellate defense counsel in this case have completed their review of the record of trial.

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

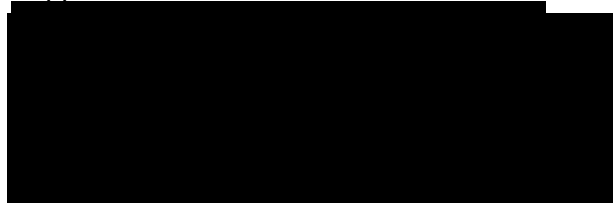
Through no fault of Appellant, undersigned counsel has been unable complete her review of Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise him regarding potential errors.

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

Respectfully submitted,

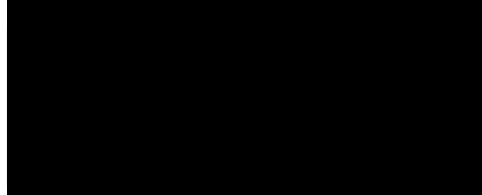


SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel

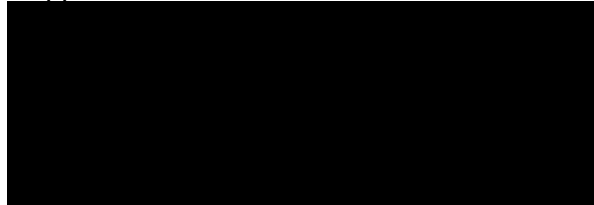


CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 16 November 2025.



SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel



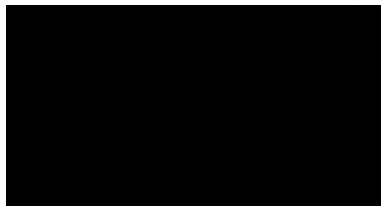
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Airman First Class (E-3))	Before Panel No. 1
KEITH A. COOPER JR.,)	
United States Air Force,)	No. ACM 40791
<i>Appellant.</i>)	
)	17 November 2025
)	

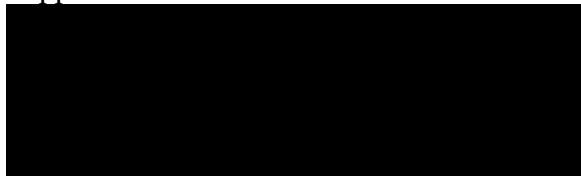
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its 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.

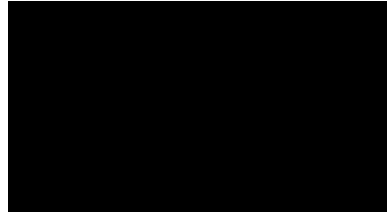


KATE E. LEE, Maj, USAF
Appellate Government Counsel

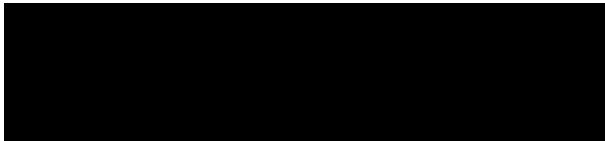


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 17 November 2025.



KATE E. LEE, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	APPELLANT’S MOTION
<i>Appellee,</i>)	FOR ENLARGEMENT
)	OF TIME (SEVENTH)
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER JR.,)	No. ACM 40791
United States Air Force,)	
<i>Appellant.</i>)	17 December 2025

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

Pursuant to Rule 23.3(m)(3) and (6) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **28 January 2026**. The record of trial was docketed with this Court on 3 April 2025. From the date of docketing to the present date, 258 days have elapsed. On the date requested, 300 days will have elapsed.

On 2 October 2024, at Cannon Air Force Base, New Mexico, a general court-martial composed of officer and enlisted members found Appellant guilty, contrary to his pleas, of one specification¹ of attempted sexual assault of child, in violation of Article 80, Uniform Code of Military Justice (UCMJ). R. at 1, 53, 55, 59, 510. The military judge sentenced Appellant to be reprimanded, to be reduced to the grade of E-1, to be confined for one year, and to be discharged with a dishonorable discharge. R. at 512, 549. The convening authority took no action on the find



GRANTED
22 DEC 2025

¹ The defense made a motion for unreasonable multiplication of charges, which resulted in the military judge merging “what was previously Specifications 1 and 2 into a single specification.” R. at 53 (referencing Appellate Ex. XXVI).

The trial transcript is 549 pages long. The electronic record of trial contains seven Prosecution Exhibits, three Defense Exhibits, and forty Appellate Exhibits. Appellant is not currently confined.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information. Undersigned counsel is currently assigned 20 cases; 9 cases are pending before this Court (6 cases are pending AOE's; 1 case was remanded), 4 cases are pending before the United States Court of Appeals for the Armed Forces (CAAF) (1 case is pending a petition for a grant of review and the respective supplement; 1 case is pending reply briefing), and 7 cases are pending before the Supreme Court of the United States (1 case is pending a joint petition for a writ of certiorari). To date, undersigned counsel has six cases prioritized over the present case:

1. *United States v. Marin Perez*, USCA Dkt. No. 25-0238/AF – The Government's answer brief is due on 29 December 2025. Upon receipt, undersigned counsel has seven days to file the reply brief. No extension requests are anticipated. Oral argument is scheduled for 25 February 2026.

2. *United States v. Kristopik*, No. ACM 40674 – The Government's answer brief is due on 31 December 2025. Undersigned counsel will likely request additional time to reply due to *Marin Perez*.

3. *United States v. English*, No. ACM 40703 - The record of trial is seven volumes consisting of five admitted Prosecution Exhibits, 15 Defense Exhibits, 32 Appellate Exhibits, and two Court Exhibits. The transcript is 546 pages. This appellant is not currently confined. Undersigned counsel has reviewed the record (excluding sealed materials) and is conferring with this appellant on his options. This case is currently pending a motion for EOT (Twelfth), which is the last anticipated EOT.

4. *United States v. Culbreth*, No. ACM 40704 - The trial transcript is 103 pages long and the record of trial is electronic, which is one volume of 513 pages. There are two Prosecution Exhibits, nineteen Defense Exhibits, nine Appellate Exhibits, and two Court Exhibits. This appellant is not currently confined. Undersigned counsel has completed an initial review of the record and is conferring with civilian co-counsel and this appellant on this appellant's options. One more motion for an EOT (Twelfth) is anticipated in this case in light of *Marin Perez* and *Kristopik* as the current AOE deadline is 6 January 2026.

5. *United States v. Buckley*, No. ACM 40764 - The trial transcript is 1,636 pages long. The electronic record of trial contains 13 Prosecution Exhibits, 30 Defense Exhibits, and 65 Appellate Exhibits. This appellant is not currently confined. Undersigned counsel has not yet completed her review of the record of trial.

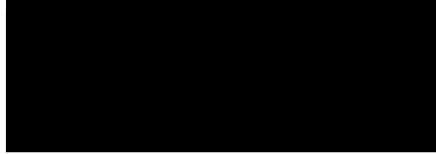
6. *United States v. Chatman*, No. ACM 40779 - The trial transcript is 965 pages long. The electronic record of trial contains 14 Prosecution Exhibits, 6 Defense Exhibits, and 46 Appellate Exhibits. This appellant is currently confined. Neither undersigned counsel nor the civilian appellate defense counsel in this case have completed their review of the record of trial.

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

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

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

Respectfully submitted,

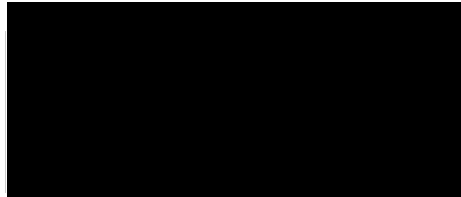


SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel

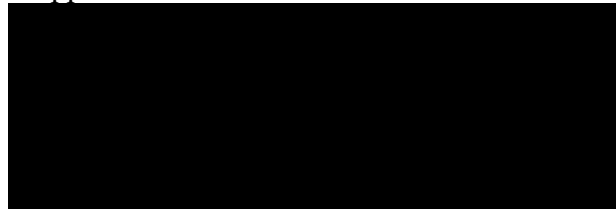


CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 17 December 2025.



SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER JR.,)	No. ACM 40791
United States Air Force.)	
<i>Appellant</i>)	19 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 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.

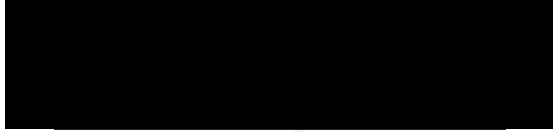


VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

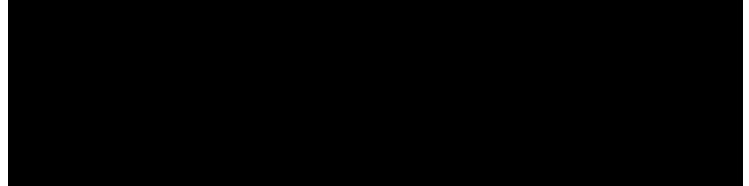


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 19 December 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

<p>UNITED STATES, <i>Appellee,</i></p> <p>v.</p> <p>Airman First Class (E-3) KEITH A. COOPER JR., United States Air Force, <i>Appellant.</i></p>	<p>) APPELLANT’S MOTION) FOR ENLARGEMENT) OF TIME (EIGHTH))) Before Panel No. 1)) No. ACM 40791)) 13 January 2026</p>
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**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES
AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) and (6) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **27 February 2026**. The record of trial was docketed with this Court on 3 April 2025. From the date of docketing to the present date, 285 days have elapsed. On the date requested, 330 days will have elapsed.

On 2 October 2024, at Cannon Air Force Base, New Mexico, a general court-martial composed of officer and enlisted members found Appellant guilty, contrary to his pleas, of one specification¹ of attempted sexual assault of child, in violation of Article 80, Uniform Code of Military Justice (UCMJ). R. at 1, 53, 55, 59, 510. The military judge sentenced Appellant to be reprimanded, to be reduced to the grade of E-1, to be confined for one year, and to be discharged with a dishonorable discharge. R. at 512, 549. The convening authority took no action on the



GRANTED
15 JAN 2026

¹ The defense made a motion for unreasonable multiplication of charges, which resulted in the military judge merging “what was previously Specifications 1 and 2 into a single specification.” R. at 53 (referencing Appellate Ex. XXVI).

The trial transcript is 549 pages long. The electronic record of trial contains seven Prosecution Exhibits, three Defense Exhibits, and forty Appellate Exhibits. Appellant is not currently confined.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information. Undersigned counsel is currently assigned 16 cases; 10 cases are pending before this Court (6 cases are pending AOE's; 1 case was remanded), 3 cases are pending before the United States Court of Appeals for the Armed Forces (CAAF) (one case is pending argument), and 3 cases are pending before the Supreme Court of the United States (1 case is pending filing an individual petition for a writ of certiorari). To date, undersigned counsel has six cases prioritized over the present case:

1. *United States v. Kristopik*, No. ACM 40674 – The Government filed an answer brief on 31 December 2025. Undersigned counsel is currently working the reply brief.

2. *United States v. Culbreth*, No. ACM 40704 - This appellant elected to withdraw from appellate review on 7 January 2026. The motion to withdraw is still pending before this Court. Unless and until it is granted, this case remains prioritized over Appellant's.

3. *United States v. Buckley*, No. ACM 40764 - The trial transcript is 1,636 pages long. The electronic record of trial contains 13 Prosecution Exhibits, 30 Defense Exhibits, and 65 Appellate Exhibits. This appellant is not currently confined. Undersigned counsel has not yet completed her review of the record of trial.

4. *United States v. Marin Perez*, USCA Dkt. No. 25-0238/AF – Oral argument is scheduled for 25 February 2026.

5. *United States v. Chatman*, No. ACM 40779 - The trial transcript is 965 pages long. The electronic record of trial contains 14 Prosecution Exhibits, 6 Defense Exhibits, and 46 Appellate

Exhibits. This appellant is currently confined. Neither undersigned counsel nor the civilian appellate defense counsel in this case have completed their review of the record of trial.

6. *United States v. Carlisle*, No. ACM 40784 – Undersigned counsel was recently detailed to this case. The electronic record of trial is twenty-eight volumes, with Volume 1 containing most of the record. It is 2,209 pages. The trial transcript is 273 pages long. The electronic record of trial contains four Prosecution Exhibits, nine Defense Exhibits, and thirty-five Appellate Exhibits. This appellant is not currently confined. Undersigned counsel has not yet completed her review of the record of trial.

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

Through no fault of Appellant, undersigned counsel has not yet been able to review Appellant’s case. An enlargement of time is necessary to allow counsel to review Appellant’s case and advise him regarding potential errors.

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

Respectfully submitted,



SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel

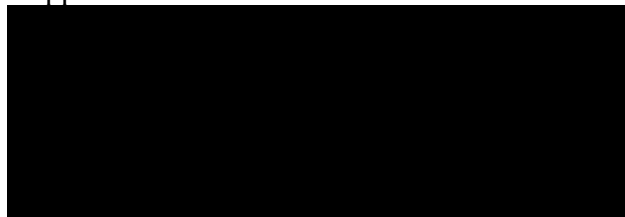


CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 13 January 2026.



SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER, JR.,)	No. ACM 40791
United States Air Force.)	
<i>Appellant</i>)	14 January 2026

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

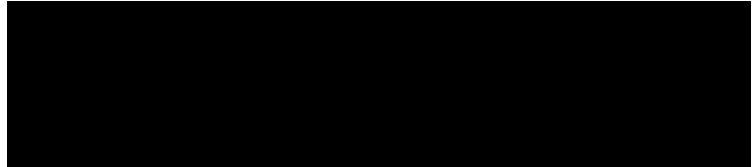
Pursuant to Rule 23.2 of this Court’s Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant’s Motion for Enlargement of Time to file an Assignment of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant nearly a year to submit an assignment of error to this Court. If Appellant’s new delay request is granted, the defense delay in this case will be 330 days in length. Appellant’s nearly year-long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court’s appellate processing standards. Appellant has already consumed almost two-thirds of the 18-month standard for this Court to issue a decision, which only leaves about 7 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant’s counsel has not completed review of the record of trial at this late stage of the appellate process.

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



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

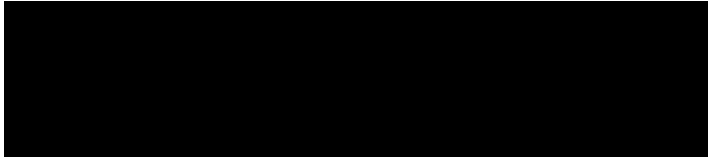


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 14 January 2026.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



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

UNITED STATES)	No. ACM 40791
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Keith A. COOPER, Jr.)	
Airman First Class (E-3))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 1

On 16 February 2026, counsel for Appellant submitted a Motion for Enlargement of Time (Ninth) requesting an additional 30 days to submit Appellant’s assignments of error. The Government opposes the motion.

The court has considered Appellant’s motion, the Government’s opposition, case law, and this court’s Rules of Practice and Procedure. Accordingly, it is by the court on this 19th day of February, 2026,

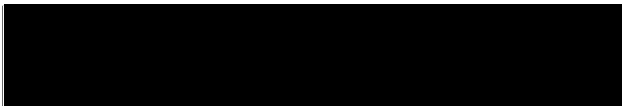
ORDERED:

Appellant’s Motion for Enlargement of Time (Ninth) is **GRANTED**. Appellant shall file any assignments of error not later than **29 March 2026**.

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



FOR THE COURT



AGNIESZKA M. GAERTNER, Capt, USAF
Commissioner

The trial transcript is 549 pages long. The electronic record of trial contains seven Prosecution Exhibits, three Defense Exhibits, and forty Appellate Exhibits. Appellant is not currently confined.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information. Undersigned counsel is currently assigned 17 cases; 11 cases are pending before this Court (7 cases are pending AOE's; 1 case is pending an Article 62, UCMJ, appeal; 1 case is pending a petition for new trial), 2 cases are pending before the United States Court of Appeals for the Armed Forces (CAAF), and 4 cases are pending before the Supreme Court of the United States (2 cases are pending filing an individual petition for a writ of certiorari). Since Appellant's last request for an EOT, undersigned counsel completed the reply brief in *United States v. Kristopik*, No. ACM 40674, and reviewed the 1,636-page transcript and 100-plus exhibits in *United States v. Buckley*, No. ACM 40764. Following review, that appellant elected to withdraw from appellate review. To date, undersigned counsel has six cases prioritized over the present case:

1. *United States v. Galvin*, Misc. Dkt. No. 2026-01 – The Government filed its Article 62, UCMJ, brief on 30 January 2026. Undersigned counsel is assigned to *Galvin* as Article 70, UCMJ, counsel and is assisting civilian appellate defense counsel in filing the respondent's brief, due 19 February 2026.

2. *United States v. Marin Perez*, USCA Dkt. No. 25-0238/AF – Oral argument is scheduled for 25 February 2026. Undersigned counsel will be preparing for oral argument while working *Galvin*.

3. *United States v. Tyson*, Misc. Dkt. No. 2026-02 – A petition for new trial was filed on 23 January 2026. The Government has 30 days to respond, with a current deadline of 22 February

2026. Thereafter, this petitioner will have 7 days to respond, barring any extensions due to oral argument in *Marin Perez*.

4. *United States v. Chatman*, No. ACM 40779 - The trial transcript is 965 pages long. The electronic record of trial contains fourteen Prosecution Exhibits, six Defense Exhibits, and forty-six Appellate Exhibits. This appellant is currently confined. Civilian appellate defense counsel has reviewed the record and begun drafting the appeal, but undersigned counsel has not yet begun her review of the record. This appellant has not waived his right to have undersigned counsel review his record.

5. *United States v. Brunson*, No. ACM 25006 – Undersigned counsel was just detailed to this case to take over for a different appellate defense counsel. This guilty plea, appealing pursuant to Article 66(b)(1)(A), UCMJ, is on EOT 10. The record of trial includes three Prosecution Exhibits, four Defense Exhibits, and nineteen Appellate Exhibits. The transcript is 229 pages. This appellant is not currently confined. Undersigned counsel has not begun her review of the record of trial.

6. *United States v. Carlisle*, No. ACM 40784 – Undersigned counsel was recently detailed to this case. The electronic record of trial is twenty-eight volumes, with Volume 1 containing most of the record. It is 2,209 pages. The trial transcript is 273 pages long. The electronic record of trial contains four Prosecution Exhibits, nine Defense Exhibits, and thirty-five Appellate Exhibits. This appellant is not currently confined. Undersigned counsel has not yet completed her review of the record of trial.

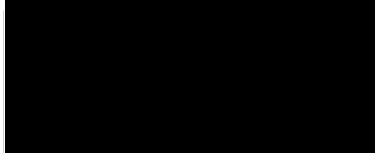
Appellant was advised of his right to a timely appeal. Appellant has been provided an update of the status of counsel's progress on his case. Appellant was advised of the request for this

enlargement of time. Appellant has provided limited consent to disclose a confidential communication with counsel wherein he consented to the request for this enlargement of time.

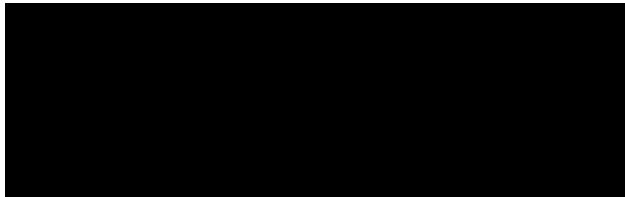
Through no fault of Appellant, undersigned counsel has not yet been able to review Appellant's case beyond what is required for this EOT motion. *See* A.F. Ct. Crim. App. R. 23.3(m)(4) (requiring a limited review of the record to assert the number of litigated specifications, the approved findings and sentence, the length of the transcript, and the number of exhibits). An enlargement of time is necessary to allow counsel to review Appellant's case and advise him regarding potential errors.

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

Respectfully submitted,

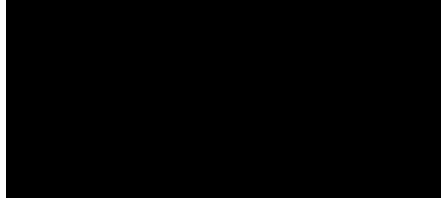


SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel

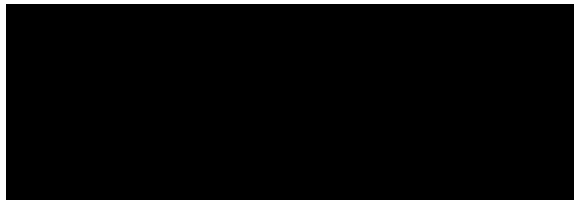


CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 16 February 2026.



SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER JR.,)	No. ACM 40791
United States Air Force.)	
<i>Appellant</i>)	18 February 2026

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

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

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant nearly a year to submit an assignment of error to this Court. If Appellant’s new delay request is granted, the defense delay in this case will be 360 days in length. Appellant’s nearly year-long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court’s appellate processing standards. Appellant has already consumed almost two-thirds of the 18-month standard for this Court to issue a decision, which only leaves about 6 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant’s counsel has not completed review of the record of trial at this late stage of the appellate process.

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

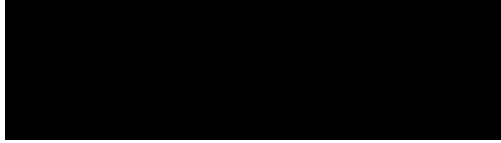


VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



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 2026.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES, <i>Appellee,</i>)	APPELLANT’S MOTION
)	FOR ENLARGEMENT
)	OF TIME (TENTH)
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER JR.,)	No. ACM 40791
United States Air Force,)	
<i>Appellant.</i>)	16 March 2026

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

Pursuant to Rule 23.3(m)(3) and (6) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **28 April 2026**. The record of trial was docketed with this Court on 3 April 2025. From the date of docketing to the present date, 347 days have elapsed. On the date requested, 390 days will have elapsed.

On 2 October 2024, at Cannon Air Force Base, New Mexico, a general court-martial composed of officer and enlisted members found Appellant guilty, contrary to his pleas, of one specification¹ of attempted sexual assault of child, in violation of Article 80, Uniform Code of Military Justice (UCMJ). R. at 1, 53, 55, 59, 510. The military judge sentenced Appellant to be reprimanded, to be reduced to the grade of E-1, to be confined for one year, and to be discharged dishonorable discharge. R. at 512, 549. The convening authority took no action on the or the sentence. Convening Authority Decision on Action (Oct. 28, 2024).



GRANTED
18 MAR 2026

¹ The defense made a motion for unreasonable multiplication of charges, which resulted in the military judge merging “what was previously Specifications 1 and 2 into a single specification.” R. at 53 (referencing Appellate Ex. XXVI).

The trial transcript is 549 pages long. The electronic record of trial contains seven Prosecution Exhibits, three Defense Exhibits, and forty Appellate Exhibits. Appellant is not currently confined.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information. Undersigned counsel is currently assigned 15 cases; 11 cases are pending before this Court (7 cases are pending AOE's), 2 cases are pending before the United States Court of Appeals for the Armed Forces (CAAF), and 2 cases are pending before the Supreme Court of the United States (both pending filing an individual petition for a writ of certiorari). Since Appellant's last motion for an EOT, undersigned counsel completed oral argument in *United States v. Marin Perez*, USCA Dkt. No. 25-0238/AF, filed the answer in *United States v. Galvin*, Misc. Dkt. No. 2026-01, and responded to the Government's opposition to a petition for new trial in *United States v. Tyson*, Misc. Dkt. No. 2026-02. Undersigned counsel is currently reviewing the record in *United States v. Chatman*, No. ACM 40779, and is on page 685 of the transcript. To date, undersigned counsel has **three** cases prioritized over the present case:

1. *United States v. Chatman*, No. ACM 40779 - The trial transcript is 965 pages long. The electronic record of trial contains fourteen Prosecution Exhibits, six Defense Exhibits, and forty-six Appellate Exhibits. This appellant is currently confined. Civilian appellate defense counsel has reviewed the record and begun drafting the appeal. Undersigned counsel has reviewed the motions, pre- and post-trial matters, and is in the middle of reviewing the merits portion of the trial (on page 685 of the transcript). Upon completing her review, undersigned counsel will coordinate with civilian appellate defense counsel on the status of the brief. This appellant has not waived his right to have undersigned counsel review his record.

2. *United States v. Brunson*, No. ACM 25006 – Undersigned counsel was recently detailed

to this case to take over for a different appellate defense counsel. This guilty plea, appealing pursuant to Article 66(b)(1)(A), UCMJ, is on EOT 10. The record of trial includes three Prosecution Exhibits, four Defense Exhibits, and nineteen Appellate Exhibits. The transcript is 229 pages. This appellant is not currently confined. Undersigned counsel has not conducted an in-depth review of the record of trial, but is tracking that there are at least two issues that will be raised.

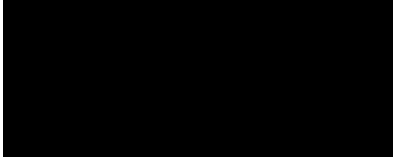
3. *United States v. Carlisle*, No. ACM 40784 – Undersigned counsel may move to withdraw as appellate defense counsel from this case, but that is pending coordination with co-counsel and this appellant. The electronic record of trial is twenty-eight volumes, with Volume 1 containing most of the record. It is 2,209 pages. The trial transcript is 273 pages long. The electronic record of trial contains four Prosecution Exhibits, nine Defense Exhibits, and thirty-five Appellate Exhibits. This appellant is not currently confined. Undersigned counsel has not reviewed the record of trial.

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

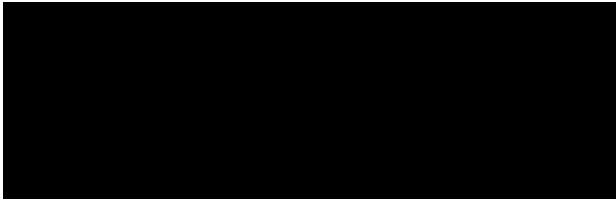
Through no fault of Appellant, undersigned counsel has not yet been able to review Appellant's case beyond what is required for this EOT motion. *See* A.F. Ct. Crim. App. R. 23.3(m)(4) (requiring a limited review of the record to assert the number of litigated specifications, the approved findings and sentence, the length of the transcript, and the number of exhibits). An enlargement of time is necessary to allow counsel to review Appellant's case and advise him regarding potential errors.

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

Respectfully submitted,

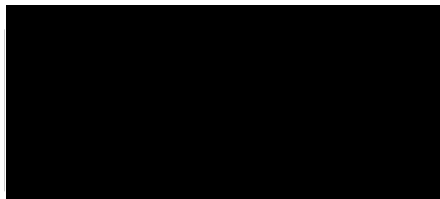


SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel

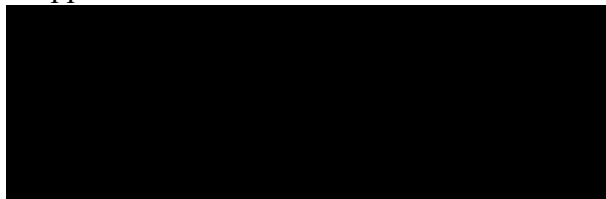


CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 16 March 2026.



SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER, JR,)	No. ACM 40791
United States Air Force.)	
<i>Appellant</i>)	17 March 2026

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

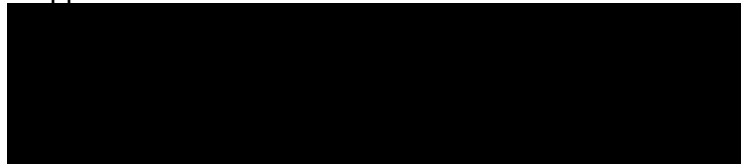
Pursuant to Rule 23.2 of this Court’s Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant’s Motion for Enlargement of Time to file an Assignment of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant 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 started 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

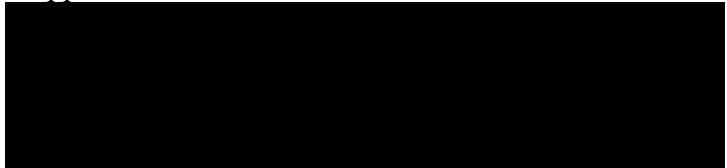


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 17 March 2026.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

<p>UNITED STATES, <i>Appellee,</i></p> <p>v.</p> <p>Airman First Class (E-3) KEITH A. COOPER JR., United States Air Force, <i>Appellant.</i></p>	<p>) APPELLANT’S MOTION) FOR ENLARGEMENT) OF TIME (ELEVENTH))) Before Panel No. 1)) No. ACM 40791)) 15 April 2026</p>
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**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES
AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3), (4), and (6) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **28 May 2026**. The record of trial was docketed with this Court on 3 April 2025. From the date of docketing to the present date, 377 days have elapsed. On the date requested, 420 days will have elapsed.

On 2 October 2024, at Cannon Air Force Base, New Mexico, a general court-martial composed of officer and enlisted members found Appellant guilty, contrary to his pleas, of one specification¹ of attempted sexual assault of child, in violation of Article 80, Uniform Code of Military Justice (UCMJ). R. at 1, 53, 55, 59, 510. The military judge sentenced Appellant to be reprimanded, to be reduced to the grade of E-1, to be confined for one year, and to be discharged with a dishonorable discharge. R. at 512, 549. The convening authority took no action on the findings or the sentence. Convening Authority Decision on Action (Oct. 28, 2024).



¹ Appellant made a motion for unreasonable multiplication of charges, which resulted in the military judge merging “what was previously Specifications 1 and 2 into a single specification.” (see Appellate Ex. XXVI).

GRANTED

16 APR 2026

The trial transcript is 549 pages long. The electronic record of trial contains seven Prosecution Exhibits, three Defense Exhibits, and forty Appellate Exhibits. Appellant is not currently confined.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information. Undersigned counsel is currently assigned 14 cases; 9 cases are pending before this Court (6 cases are pending AOE's), 2 cases are pending before the United States Court of Appeals for the Armed Forces (CAAF) (one case is pending a petition for grant of review and accompanying supplement), and 3 cases are pending before the Supreme Court of the United States (one case is pending filing an individual petition for a writ of certiorari). Since Appellant's last motion for an EOT, undersigned counsel completed reviewing the record in *United States v. Chatman*, No. ACM 40779, drafted six out of the nine assignments of error, assisted this appellant with personally raised issues, and filed the fifty-nine page AOE. To date, undersigned counsel has **two** cases prioritized over the present case:

1. *United States v. Brunson*, No. ACM 25006 – Undersigned counsel has reviewed the record and is consulting with this appellant on issues to raise. This AOE is due 9 May 2026. Upon completion of this AOE, undersigned counsel intends to turn to Appellant's case.

2. *Chatman (supra)* – Depending on timing, this appellant's reply brief may take priority over Appellant's AOE. But undersigned counsel intends to work on Appellant's case and any reply in tandem.

Based on the deadlines for the two cases prioritized above Appellant's case and the nature of Appellant's case, one additional EOT may be requested.

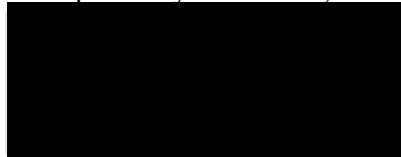
Appellant was advised of his right to a timely appeal. Appellant has been provided an update of the status of counsel's progress on his case. Appellant was advised of the request for this

enlargement of time. Appellant has provided limited consent to disclose a confidential communication with counsel wherein he consented to the request for this enlargement of time.

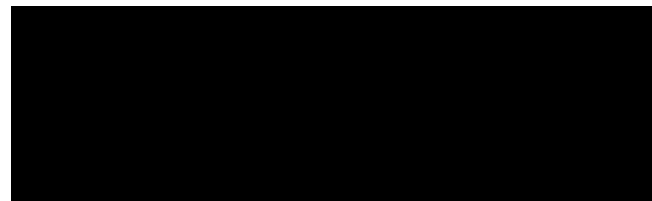
Through no fault of Appellant, undersigned counsel has not yet been able to review Appellant's case beyond what is required for this EOT motion. *See* A.F. Ct. Crim. App. R. 23.3(m)(4) (requiring a limited review of the record to assert the number of litigated specifications, the approved findings and sentence, the length of the transcript, and the number of exhibits). An enlargement of time is necessary to allow counsel to review Appellant's case and advise him regarding potential errors.

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

Respectfully submitted,



SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel

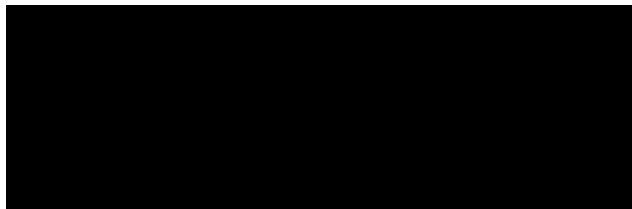


CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on 15 April 2026.



SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

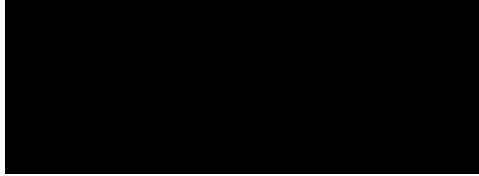
UNITED STATES,)	UNITED STATES’
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER, JR,)	No. ACM 40791
United States Air Force.)	
<i>Appellant</i>)	16 April 2026

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

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

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant 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 420 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 4 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant’s counsel has not completed a 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.

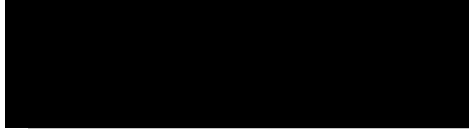


VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

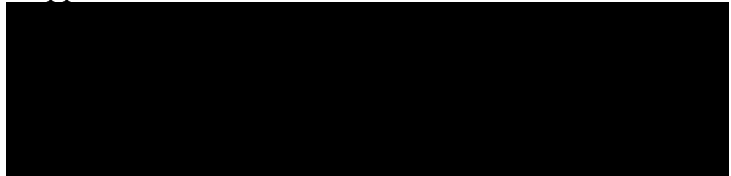


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 16 April 2026.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

<p>UNITED STATES, <i>Appellee,</i></p> <p>v.</p> <p>Airman First Class (E-3) KEITH A. COOPER JR., United States Air Force, <i>Appellant.</i></p>	<p>) APPELLANT’S MOTION) FOR ENLARGEMENT) OF TIME (TWELFTH))) Before Panel No. 1)) No. ACM 40791)) 18 May 2026</p>
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**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES
AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3), (4), and (6) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **27 June 2026**. The record of trial was docketed with this Court on 3 April 2025. From the date of docketing to the present date, 410 days have elapsed. On the date requested, 450 days will have elapsed. Barring unforeseen circumstances, undersigned counsel anticipates this will be Appellant’s last EOT request. If the Court is inclined to deny this EOT motion, Appellant requests a status conference.

On 2 October 2024, at Cannon Air Force Base, New Mexico, a general court-martial composed of officer and enlisted members found Appellant guilty, contrary to his pleas, of one specification¹ of attempted sexual assault of child, in violation of Article 80, Uniform Code of Military Justice (UCMJ). R. at 1, 53, 55, 59, 510. The military judge sentenced Appellant to be



GRANTED
19 MAY 2026

¹ The defense made a motion for unreasonable multiplication of charges, which resulted in the military judge merging “what was previously Specifications 1 and 2 into a single specification.” R. at 53 (referencing Appellate Ex. XXVI).

with a dishonorable discharge. R. at 512, 549. The convening authority took no action on the findings or the sentence. Convening Authority Decision on Action (Oct. 28, 2024).

The trial transcript is 549 pages long. The electronic record of trial contains seven Prosecution Exhibits, three Defense Exhibits, and forty Appellate Exhibits. Appellant is not currently confined.

Pursuant to A.F. Ct. Crim. App. R. 23.3(m)(6), undersigned counsel provides the following information. Undersigned counsel is currently assigned 11 cases; 8 cases are pending before this Court (4 cases are pending AOE's), 2 cases are pending before the United States Court of Appeals for the Armed Forces (CAAF) (one case is pending a petition for grant of review and accompanying supplement), and 1 case is pending before the Supreme Court of the United States (pending filing an individual petition for a writ of certiorari). Since Appellant's last motion for an EOT, undersigned counsel advised the appellant in *United States v. Brunson*, No. ACM 25006, and facilitated that appellant's withdrawal from appellate review, drafted an amicus brief for *United States v. Kruse*, No. 26-0156/MC, attended the annual CAAF Continuing Legal Education and Training Program (13-14 May 2026), and completed review of Appellant's case.

No case is prioritized over Appellant's. But undersigned counsel needs additional time to complete the AOE. Appellant's AOE is due in ten days (four of which make up a holiday weekend, which limits Division availability for peer and leadership review). For two of those ten days, undersigned counsel is attending arguments at the CAAF,² time that, when combined, eliminates one duty day of work. The little time left is not enough to (1) draft the AOE, (2) route the AOE through peer review, (3) make any necessary edits, (4) route the brief through leadership

² The entire Appellate Defense Division is required to attend oral argument when a Department of the Air Force case is being heard, as is the case on 20 May 2026. Undersigned counsel is attending on 19 May 2026 due to her representation of the Division as counsel for amicus curiae in *Kruse*.

review, and (5) and then finalize the brief for this Court. Additional time is necessary to provide Appellant effective assistance of counsel.

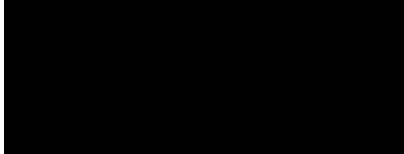
Undersigned counsel is hopeful that the AOE can be submitted well before the end of this thirty-day enlargement request, but undersigned counsel cannot account for leadership availability and the lack thereof during the next three weeks. Specifically, for the next three weeks, the Air Force Appellate Defense leadership is reduced by two, causing a redistribution in workload and leadership reviews. Leadership will be further reduced to one individual during the first week of June. Peer and leadership reviews are a requirement in the Division and take approximately a week to complete on a condensed timeline with full manning. Thus, the request for an additional thirty days, rather than a shorter amount, is to avoid problems during this time of low leadership availability.

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

Through no fault of Appellant, undersigned counsel has not yet been able to complete Appellant's AOE. An enlargement of time is necessary to allow counsel to draft and file Appellant's appeal.

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

Respectfully submitted,

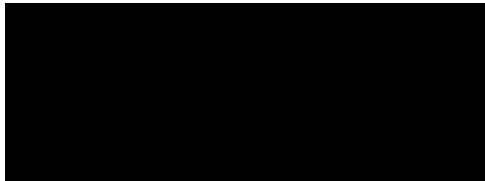


SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel

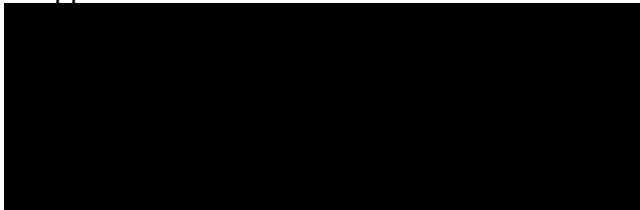


CERTIFICATE OF FILING AND SERVICE

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SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

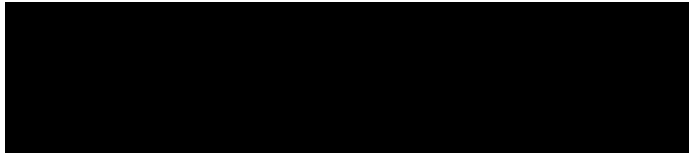
UNITED STATES,)	UNITED STATES' OPPOSITION
)	TO APPELLANT'S MOTION FOR
<i>Appellee,</i>)	ENLARGEMENT OF TIME
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v.)	
)	Before Panel No. 1
Airman First Class (E-3))	
KEITH A. COOPER, JR.,)	No. ACM 40791
United States Air Force.)	
<i>Appellant</i>)	19 May 2026

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

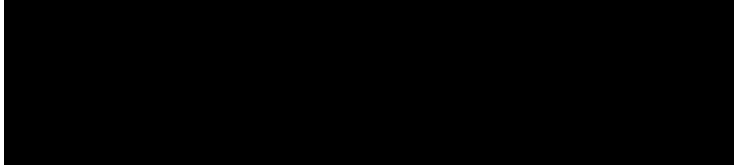
Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant over a year to submit an assignment of error to this Court. If Appellant's new delay request is granted, the defense delay in this case will be 450 days in length. Appellant's over year-long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court's appellate processing standards. Appellant has already consumed more than two-thirds of the 18-month standard for this Court to issue a decision, which only leaves about 3 months combined for the United States and this Court to perform their separate statutory responsibilities.

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

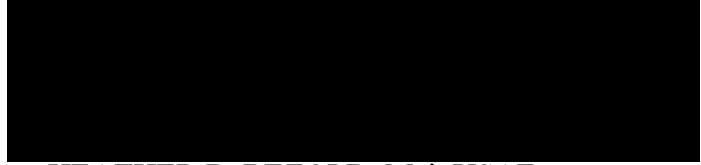


HEATHER R. BEZOLD, Maj, USAF
Appellate Government Counsel

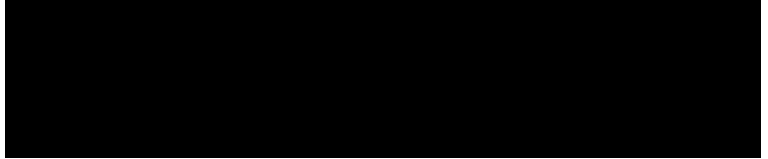


CERTIFICATE OF FILING AND SERVICE

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Appellate Defense Division on 19 May 2026.



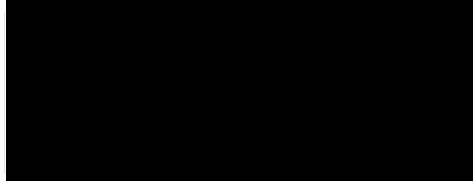
HEATHER R. BEZOLD, Maj, USAF
Appellate Government Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Air Force Government Trial and Appellate Operations Division on May 27, 2026.

Respectfully submitted,



SAMANTHA M. CASTANIEN, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

