

IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES,

Appellee

v.

Specialist (E-4)

**JORGE G. MARTINEZ COLON**

United States Army,

Appellant

**MOTION FOR EXTENSION  
REPLY BRIEF**

Docket No. ARMY 20210071

Tried at Fort Hood, Texas, on 9-12  
February 2021, before a general court-  
martial appointed by the Commander,  
Headquarters, III Corps and Fort Hood,  
Lieutenant Colonel Scott Z. Hughes,  
military judge, presiding.

TO THE HONORABLE, THE JUDGES OF THE UNITED STATES ARMY  
COURT OF CRIMINAL APPEALS

COMES NOW the undersigned appellate defense counsel, pursuant to Rules  
23 and 24 of this Court's Rules of Appellate Procedure and move for a 14-day  
extension **until 9 December 2022** to file appellant's brief. The brief is currently  
due 25 November 2022.

Consistent with Army Reg. 27-26, Rules of Professional Conduct for  
Lawyers, undersigned counsel request additional time to ensure that all due  
diligence has been done to adequately review, investigate, research, and brief the  
assignments of error in this case and to fulfil counsel's ethical obligation to  
represent appellant's interest.

The transcript in this contested case is 435 pages. The approved sentence  
was adjudged on 12 February 2021, and it includes reduction to the grade of E-1,

confinement for four years and a discharge from the service with a dishonorable discharge. Appellant is still in confinement. He concurs with this request.

The case is currently due the day after Thanksgiving. Civilian defense counsel requests additional time to review the record, research issues, and confer with appellant and detailed military defense counsel before submitting the reply brief.

WHEREFORE, appellate defense counsel respectfully requests that this Court grant the instant motion.


PANEL NO. 3

MOTION FOR EXTENSION REPLY

GRANTED: 

DENIED: \_\_\_\_\_

DATE: 28 November 2022

  
FOR William E. Cassara  
Civilian Appellate Counsel

  
  
Tumentúgs D. Armstrong  
Captain, Judge Advocate  
Defense Appellate Division

**CERTIFICATE OF FILING AND SERVICE**

I certify that a copy of the foregoing was electronically submitted to Army  
Court and Government Appellate Division on November 22, 2022.



**MICHELLE L.W. SURRATT**  
**Paralegal Specialist**  
**Defense Appellate Division**

