UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

No. 25-2774

SONNIE L. COOPER,
Appellant

v.

UNITED STATES OF AMERICA

On Appeal from the U.S. District Court, D.N.J.
Judge Georgette Castner, No. 3:24-cv-00547

Before: HARDIMAN, MCKEE, and AMBRO, *Circuit Judges*
Submitted: Nov. 16, 2026; Filed: Nov. 20, 2026

NONPRECEDENTIAL OPINION*

HARDIMAN, *Circuit Judge*.

Sonnie L. Cooper appeals the District Court's order denying his petition for a writ of error coram nobis. Because Cooper was not entitled to such extraordinary relief, we will affirm.

I

In 2011, a jury convicted Cooper and his co-defendant, Ronald Salahuddin, of conspiracy to violate the Hobbs Act. App. 54–57. We affirmed their convictions in 2014. *See United States v. Salahuddin*, 765 F.3d 329, 350 (3d Cir. 2014). Two years later, the Supreme Court decided *McDonnell v. United States*, 579 U.S. 550 (2016), which clarified

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* This disposition is not an opinion of the full Court and pursuant to Third Circuit I.O.P. 5.7 does not constitute binding precedent.

the meaning of "official act" in the Hobbs Act. *Id.* at 574. Two years later, Salahuddin brought a petition for a writ of error coram nobis, arguing that *McDonnell* rendered his jury instructions invalid. The district court denied the petition, and Salahuddin failed to timely appeal. *See United States v. Salahuddin*, 803 F. App'x 663, 664 (3d Cir. 2020).

In 2023, Cooper filed his own petition for writ of error coram nobis twelve years after he was convicted and five years after Salahuddin filed his petition. The District Court denied Cooper's petition, holding, among other things, that he did not offer sound reasons for the lengthy delay and that he could have raised his arguments at trial. Cooper timely appealed.

II[1]

A writ of coram nobis should not issue if the petitioner fails to "provide[] sound reasons for failing to seek relief earlier." *Ragbir v. United States*, 950 F.3d 54, 62, 66–67 (3d Cir. 2020). The District Court did not err when it held that Cooper failed to satisfy this prerequisite.

Although there is no fixed deadline for seeking coram nobis relief, the petitioner must have "sound reasons" for delay. *United States v. De Castro*, 49 F.4th 836, 843 (3d Cir. 2022). Cooper filed his petition twelve years after his conviction became final and seven years after *McDonnell* was decided. That substantial delay is well beyond other timeframes we have rejected. *See, e.g.*, *Mendoza v. United States*, 690 F.3d 157, 159–60 (3d Cir. 2012)

[1] The District Court had jurisdiction under 18 U.S.C. § 3231. We have jurisdiction under 28 U.S.C. § 1291. We review legal questions de novo and factual findings for clear error. *Ragbir v. United States*, 950 F.3d 54, 60 (3d Cir. 2020).

(four-year delay); *Ragbir*, 950 F.3d at 64 (no sound reason for six-to-ten-year delay, explaining that coram nobis is not "forgiving of delay and dilatoriness").

Cooper tries to excuse his delay by arguing that *McDonnell* clarified the meaning of "official act," which the jury instructions did not reflect during his trial. But "[l]egal ambiguity is . . . not a sound reason for delay." *Ragbir*, 950 F.3d at 63.

The District Court also held that Cooper could have raised at trial the argument he makes now. We agree. Cooper does not explain why he, unlike the defendants in *McDonnell*, 579 U.S. at 564–65, could not have requested his desired jury instructions during the trial. *See De Castro*, 49 F.4th at 846 (stating that argument is not futile even when there is a "uniform wall of precedent" from the courts of appeals against it (quoting *Greer v. United States*, 593 U.S. 503, 511 (2021)). Cooper could have raised that same argument in his original trial and appeal.

Finally, even if the obstacles just mentioned did not preclude Cooper's petition, he cannot justify why he waited five years to seek relief after his co-defendant, Salahuddin.

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In sum, the District Court's judgment is supported on multiple independent grounds. We will affirm.