

1 TERRY GODDARD
ATTORNEY GENERAL
2 (FIRM STATE BAR NO. 14000)

3 JOHN L. SACCOMAN
ASSISTANT ATTORNEY GENERAL
CRIMINAL APPEALS SECTION
4 1275 W. WASHINGTON
PHOENIX, ARIZONA 85007-2997
5 TELEPHONE: (602) 542-4686
(STATE BAR NUMBER 013397)
6 E-MAIL: CADocket@azag.gov
ATTORNEYS FOR RESPONDENTS

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF ARIZONA**

10 KELLY RAY BAILEY,

11 Petitioner,

12 -vs-

13 ANTONIO BACA, et al.,

14 Respondents.

CV 03-044-TUC-CKJ

MOTION FOR EXTENSION OF
TIME TO FILE ANSWER TO
PETITION FOR WRIT OF
HABEAS CORPUS

(First Request)

15
16 Respondents' Answer to Petitioner's Petition for Writ of Habeas Corpus is
17 currently due April 16, 2007. Respondents respectfully request an extension of 60
18 days, until June 15, 2007, in which to file their Answer to Petitioner's Petition for
19 Writ of Habeas Corpus. Respondents' attorney did not represent the State in
20 Petitioner's post-conviction proceedings, and has not yet received any part of the
21 state-court record from Pima County. For this reason, and because of prior and
22 current involvement in cases pending before this and other courts, Respondents'
23 attorney needs this additional time to assemble the state-court record, to familiarize
24
25
26
27
28

1 himself with that record, and to thoroughly address the issues raised in Petitioner's
2 petition.

3 DATED this 6th day of April, 2007.

4 RESPECTFULLY SUBMITTED,
5 TERRY GODDARD
6 ATTORNEY GENERAL

7
8 s/JOHN L. SACCOMAN
9 ASSISTANT ATTORNEY GENERAL
10 ATTORNEYS FOR RESPONDENTS

11 I hereby certify that on April 6, 2007, I electronically transmitted the attached
12 document to the Clerk's Office using the ECF System for filing and deposited for
13 mailing the attached document and the Notice of Electronic Filing to the following,
14 non-registered participant of the ECF System:

15 Kelly Ray Bailey #86004
16 Barchey Unit/Lewis Complex
17 P. O. Box 3200
18 Buckeye, Az 85326

19 Petitioner Pro Se

20 s/JOHN L. SACCOMAN

21 CRM 99-0599
22 127720
23
24
25
26
27
28