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7 Attorney for Petitioner
8 VALERIE CAMPBELL

9
10 IN THE UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 VALERIE CAMPBELL,

No. CV-06-2225 CRB

13 Petitioner-Appellant,

14 **APPLICATION FOR EXTENSION
15 OF TIME TO FILE TRAVERSE**

16 v.

17 GLORIA HENRY,

18 Respondent-Appellee.
19 _____)

20 I, ERIK G. BABCOCK, declare as follows:

21 1. Ms. Campbell filed a pro se federal habeas petition in 2006. The court granted
22 respondent's motion to dismiss on timeliness grounds. I was subsequently appointed
23 to represent her in the Ninth Circuit. The Ninth Circuit found her petition was timely
24 and remanded to this court. The court reinstated the Order the Show Cause. On
25 March 24, 2011 respondent filed a response to the Order to Show Cause. After a
26 couple of extensions, my traverse is due today, March 12, 2012.

27 2. I am requesting an additional 60 days in which to file a traverse. I have exercised
28

1 diligence but I am still not able to file the traverse by today, as currently scheduled.

2 3. I have finished reviewing the record in this case. However, I still need to do some
3 research and writing. First I need to finish my opening brief in Clarke v. Yates, No.
4 11-15232, a state habeas with a very lengthy record in which I have received several
5 extension but the Ninth Circuit has indicated no further extensions should be
6 requested. I have also been involved in several other time-limited commitments,
7 including competency proceedings in a state court murder case, People v. Ying Hua
8 Wu.

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10 4. I have previously spoken with respondent's counsel about this case and understood
11 him to say that he would have no objection to, or be prejudiced by, any requested
12 extensions. I left him a voicemail today about whether he objects to another but have
13 not heard from him.

14
15 6. My client is currently in state custody serving a sentence of 25 to life for murder,
16 followed by two consecutive life sentences for two attempted murder convictions.

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18 7. I therefore request approximately another 60 days, to and including May 4, 2012.

19 I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th
20 day of March 2012 at Oakland, California.

21 /s Erik Babcock _____
22 ERIK G. BABCOCK
23 Counsel for Petitioner

24 Signed: March 19, 2012

