Robert J. Beles Bar No. 41993 1 Paul McCarthy Bar No. 139497 One Kaiser Plaza, Suite 2300 2 Oakland, California 94612-3642 Tel No. (510) 836-0100 3 Fax. No. (510) 832-3690 4 Attorneys for Petitioner 5 6 United States District Court 7 Northen District of California San Francisco Courthouse 8 9 No. 3:13-CV-05718-VC VINCENT TURNER, 10 Petitioner, MOTION AND DECLARATION OF GOOD 11 v. CAUSE FOR EXTENSION OF TIME TO FILE TRAVERSE AND REPLY FRED FOULK, Warden, High Desert State MEMORANDUM 12 Prison 13 Respondent, 14 PEOPLE OF THE STATE OF CALIFORNIA, 15 Real Party in Interest. 16 MOTION AND DECLARATION OF GOOD CAUSE FOR 17 EXTENSION OF TIME TO FILE TRAVERSE AND REPLY MEMORANDUM 18 I, Paul McCarthy, declare under penalty of perjury as follows: 19 1. I am the attorney for petitioner in this case. 20 2. Respondent's Answer was filed on June 5, 2014. Utilizing the deadline set forth in 21 the Order to Show Cause, the Traverse is due on July 5, 2014. 22 3. Counsel requests an extension of 30 days, so that the traverse and reply will be due 23 on Monday, August 4, 2014. 24 4. Petitioner has not previously requested any extensions of time to file the traverse and 25 26

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reply memorandum.

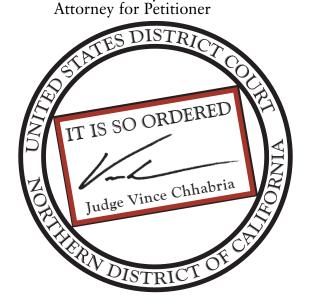
Date: July 3, 2014

5. Within the last 30 days, I prepared and filed two federal petitions for writ of habeas corpus (Moran and Gonzalez). I also filed a traverse for Fernandez and an opening brief in the First Appellate District (Jimenez). Because of the work on these items, I will be unable to prepare and file the traverse and reply memorandum by the due date.

6. On June 27, 2014, my office contacted Margo Yu, the listed attorney of record for respondent. Ms. Yu indicated that she had no objection to the request.

I declare under penalty of perjury that the facts stated in this declaration are true and correct. Executed in Oakland, California, on Friday, June 27, 2014.

Paul McCarthy



Motion and Declaration of Good Cause for Extension of Time to File Traverse and Reply Memorandum