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 8 Attorneys for *Petitioner*

9 **United States District Court**
 10 Northern District of California

11 JIDEOFOR AJAELO,

12 *Petitioner,*

13 vs.

14 DOMINGO URIBE, Warden, California State
 15 Prison - Centinela, Imperial, California,

16 *Respondent.*

17 PEOPLE OF THE STATE OF CALIFORNIA,

18 *Real Party in Interest.*

19 **No. 5:10-CV-03327-JF**
 20 **ORDER GRANTING**
 21 **AMENDED MOTION AND**
 22 **DECLARATION OF GOOD CAUSE FOR**
 23 **EXTENSION OF TIME TO FILE**
 24 **TRAVERSE AND REPLY MEMORANDUM**

25 **AMENDED MOTION AND DECLARATION OF GOOD CAUSE FOR**
 26 **EXTENSION OF TIME TO FILE TRAVERSE AND REPLY MEMORANDUM**

27 I, Paul McCarthy, declare under penalty of perjury as follows:

- 28 1. I am the attorney for petitioner in this case.
2. There is a pending motion to extend the time for filing the traverse and reply brief until January 25, 2011, which was filed on December 22, 2010 and which the court has not yet ruled on.
3. Petitioner amends this motion to request a further extension of 15 days, so that the traverse and reply will be due on Wednesday, February 9, 2011.
3. Petitioner has previously requested and received one 30 day extension of time to file the traverse and reply memorandum.

1 4. This office has an international extradition case on for final hearing on January 31,
2 2011 in the U.S. District Court for the Northern District of California before Magistrate Judge
3 Nandor Vadas in which an extensive trial / hearing memorandum will have to be filed on or
4 before January 26, 2011. This is an unusual case in which the alleged offenses would have
5 occurred in the Republic of Ireland between 1977 and 1981 and there is thus a significant issue
6 of timeliness of the prosecution by the Irish authorities. In addition, I have an opening brief in
7 the First District Court of Appeal in the final 30 day grace period under California Rules of
8 Court 8.360(c)(5) and is due on January 28, 2011. As the appeal is subject to dismissal if the
9 brief is not filed by that date, it will have to be filed and in fact is already partially written.
10 However, due to this work, I will not be able to complete the traverse and reply memorandum
11 by the previously requested date of January 25, 2011.

12 5. I previously contacted the attorney for respondent, Aileen Bunney, at the Office of
13 Attorney General, 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004,
14 telephone 415-703-5869 concerning whether respondent had any objection to the previously
15 requested 30 day extension of time, and she advised me that respondent had no objection. On
16 January 24, 2011, at approximately 10:45 and left a message on her voice mail asking if
17 respondent would have any objection to an additional 15 day extension of time. As of the filing
18 of this motion, I have not heard back from Ms. Bunney. I will advise the court whether
19 respondent objects to the extension as soon as this information is available.

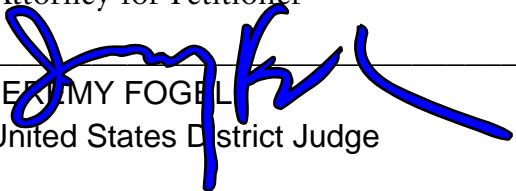
20 I declare under penalty of perjury that the facts stated in this declaration are true and
21 correct. Executed in Oakland, California, on Monday, January 24, 2011.

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26 IT IS SO ORDERED.

27 Dated: 1/31/2011



Paul McCarthy
Attorney for Petitioner


JEREMY FOGEL
United States District Judge