

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 02-23283-CIV-MOORE/SORRENTINO
(91-698-CR-MOORE)

COURTNEY RICARDO ALFORD,)
a/k/a "Rickey")
)
Movant,)
)
v.)
)
UNITED STATES OF AMERICA,)
)
Respondent.)

MOTION TO ACCEPT GOVERNMENT'S
RESPONSE AND MEMORANDUM OF LAW
IN EXCESS OF TWENTY (20) PAGES

COMES NOW the United States of America, by and through its undersigned Assistant United States Attorney, respectfully requests that this court grant the government permission to file its response and memorandum of law in opposition to movant's Motion to Vacate, Set Aside or Correct Sentence in excess of twenty (20) pages.

In support of this motion, the United States of America states as follows:

1. Courtney Ricardo Alford, movant and petitioner in the instant matter, has submitted claims of sentencing error and has alleged ineffective assistance of counsel by his trial defense counsel. While movant has raised these various and sundry claims concerning the conduct of his sentencing hearing and makes a vague assertion of ineffective assistance regarding his counsel, his petition provides a *de minimus* discussion of both the facts and circumstances adduced at his trial which determined his sentence and, indeed, the *habeas* claims themselves.

2. Given the above circumstances the government has found it necessary to provide this court with a comprehensive statement of the facts of movant's case to place his complaints concerning the conduct of his sentencing hearing and the performance of his trial counsel in proper

context. Furthermore, the "bare bones" claims made by movant require additional length to properly address each of the allegations.

3. As a result of the above factors the government's response has been found to exceed twenty (20) pages.

4. This request to file a memorandum and reply in excess of twenty (20) pages is sought solely to ensure that this honorable Court receives a full and complete response by the government in the instant matter.

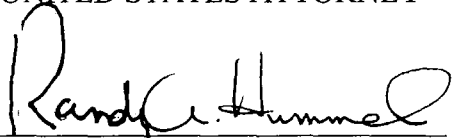
5. Movant is a pro se petitioner, currently incarcerated, who cannot be contacted with respect to his position in this matter.

The United States of America respectfully requests this court grant its motion and accept its response in opposition and memorandum of law in the instant matter concurrently submitted to the Court.

Respectfully submitted,

MARCOS DANIEL JIMENEZ
UNITED STATES ATTORNEY

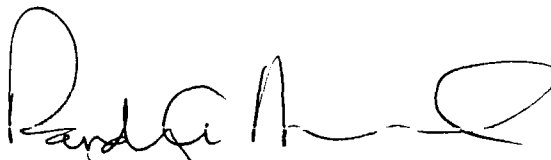
By:



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading was mailed on this the 14th day of January, 2003, to: Courtney Ricardo Alford, Movant Pro Se, Reg. No. 45774-004, F.C.I. Edgefield, P.O.Box 724, Edgefield, South Carolina 29824.

A handwritten signature in black ink, appearing to read "Randy A. Hummel", written over a horizontal line.

RANDY A. HUMMEL
Assistant United States Attorney