Cary W. Williams v. Timothy Filson, et al (DEATH PENALTY)

Doc. 250

1	There have been two prior enlargements of Respondents' time to file said response, and the		
2	motion is made in good faith and not for the purposes of delay.		
3	RESPECTFULLY SUBMITTED this	s 30th	day of May, 2019.
4			ON D. FORD
5			ney General
6		By:	/s/ Amanda C. Sage AMANDA C. SAGE (Bar No. 13429)
7			Senior Deputy Attorney General
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12		OR	RDER
13	IT IS SO ORDERED.		
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15			al
16			UNITED STATES DISTRICT JUDGE
17			Dated: May 30, 2019.
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2 AMANDA C. SAGE (Bar No. 13429) Senior Deputy Attorney General 3 Office of the Attorney General 4 Office of the Attorney General 5 Carson City, Nevada 89701-4717 Telephone: (775) 684-1108 A Sage @ag nv. gov Attorney for Respondents 10 CARY W. WILLIAMS, Petitioner(s), Vs. 11 DECLARATION OF COUNSEL 12 Vs. 13 TIMOTHY FILSON, et al., Respondent(s). 15 STATE OF NEVADA 16 CARSON CITY 17 I, AMANDA C. SAGE, hereby state, based on personal knowledge and/or information and belief, that the assertions of this declaration are true: 10	1					
State of Nevada Office of the Attorney General 100 North Carson Street Carson City, Nevada 89701-4717 Telephone: (775) 684-1108 ASage@ag.nv.gov Attorney for Respondents UNITED STATES DISTRICT COURT DISTRICT OF NEVADA Case No. 2:98-cv-00056 APG-VCF Petitioner(s), vs. TIMOTHY FILSON, et al., Respondent(s). STATE OF NEVADA STATE OF NEVADA 15 CARSON CITY 17 I, AMANDA C. SAGE, hereby state, based on personal knowledge and/or information and belief, that the assertions of this declaration are true: 1. I am a Senior Deputy Attorney General employed by the Attorney General's Office of the State of Nevada in the Bureau of Criminal Justice, Post-Conviction Unit, and I make this declaration or behalf of Respondents' motion for enlargement of time in the above-captioned matter. 2. By this motion, I am requesting a final five (5) day enlargement of time, to and including June 4, 2019, to answer Williams' petition on remand. This is Respondents' third request for an enlargement. 3. The response is currently due May 30, 2019.	2					
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4. I have dedicated substantial time towards this response, including familiarizing myself with	25	3. The response is currently due May 30, 2019.				
	26	4. I have dedicated substantial time too	vards this response, including familiarizing myself with			

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a lengthy record that dates back to. 1982. While the response is nearly complete, an additional 5 days

would give me the weekend to complete some final research and finalize my arguments. I anticipated

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filing on time, however several unexpected filings in other cases in the past two weeks required quick responses that diverted my attention. These cases included oppositions to two motions for reconsideration in Sonner v. Filson, Case No. 2:00-cv-1101 (death penalty), and Doyle v. Filson, Case No. 3:00-cv-101 (death penalty) and a reply to a lengthy opposition to a motion to dismiss in Hermansen v. Baker, 3:17-cv-135, a case I unexpectedly took over just days before the deadline. As a result, an additional 5 days would allow me to finish my response in this matter.

- 5. On May 30, 2019, I contacted Randolph Fiedler, Assistant Federal Public Defender representing Mr. Williams in this matter, about my enlargement request. Mr. Fiedler indicated he had no objection to my request for enlargement.
- 6. This motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case.

Pursuant to 28 U.S.C. § 1746, Declarant herein certifies, under penalty of perjury, that the foregoing is true and correct.

DATED: May 30, 2019.

By: /s/ Amanda C. Sage AMANDA C. SAGE (Bar No. 13429)

CERTIFICATE OF SERVICE I certify that I am an employee of the Office of the Attorney General and that on this 30th day of May, 2019, I served a copy of the foregoing UNOPPOSED MOTION FOR ENLARGEMENT OF TIME (THIRD REQUEST), by U.S. District Court CM/ECF electronic filing to: Randolph Fiedler Assistant Federal Public Defender 411 East Bonneville Avenue, Suite 250 Las Vegas, NV 89101 /s/ Laurie Sparman