

1 Rene L. Valladares
Federal Public Defender
2 Nevada Bar No. 11479
Megan Hopper-Rebegea
3 Assistant Federal Public Defender
Nevada Bar No. 15128
4 Megan_Hopper-Rebegea@fd.org
Katie Chadliev
5 Assistant Federal Public Defender
District of Columbia Bar No. 1531537
6 Katie_Chadliev@fd.org
411 E. Bonneville Ave., Ste. 250
7 Las Vegas, NV 89101
(702) 388-6577
8 (702) 388-5819 (fax)

9 Attorneys for Petitioner

10
11 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

12 James Earl Hill,

13 Petitioner,

14 v.

15 Calvin Johnson, *et al.*,

16 Respondents.

Case No. 2:98-cv-00914-KJD-DJA

**~~Stipulation and [Proposed]~~
Order to Extend Time to File
the Second Amended Petition
for Writ of Habeas Corpus**

17
18
19
20 Upon Hill's motion, the Court reopened his case on November 10, 2021. *See*
21 ECF 129. Currently, Hill's second amended petition for writ of habeas corpus is due
22 April 11, 2022.
23

1 The parties hereby stipulate and agree to a second extension of time for
2 briefing the second amended petition for 91 days. Mr. Hill will have until July 11,
3 2022, to file his second amended petition.

4 This extension is intended to allow counsel to devote adequate time to the
5 second amended petition. Since the first extension of time was filed, Mr. Hill
6 appeared before the Nevada Board of Parole Commissioners on January 26, 2022,
7 on the first degree murder and sexual assault charges. Although the parole board
8 officially denied Mr. Hill's parole on February 4, 2022, counsel did not learn the
9 results of the hearing until March 9, 2022. Good cause exists for this extension as
10 counsel has had an especially busy capital caseload. The additional time will allow
11 Mr. Hill to adequately prepare the second amended petition.

12 By stipulating to this extension, Respondents do not waive any possible
13 defenses to the existing petitions or future petitions.

14 Dated this 8th day of April, 2022.

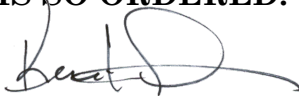
15 Rene L. Valladares
16 Federal Public Defender

Aaron Ford
Nevada Attorney General

17 /s/ Megan Hopper-Rebegea
18 Megan Hopper-Rebegea
19 Assistant Federal Public Defender

/s/ Heather D. Procter
Heather Procter
Chief Deputy Attorney General

20 **IT IS SO ORDERED.**

21 
22 U.S. District Judge Kent J. Dawson

23 Dated: April 12, 2022.