RENE L. VALLADARES Federal Public Defender State Bar No. 11479 GARY TAYLOR State Bar No. 11031C Assistant Federal Public Defender 411 E. Bonneville, Ste. 250 Las Vegas, Nevada 89101 (702) 388-6577 (Fax) 388-6261		
Attorney for Petitioner		
UNITED STATES DISTRICT COURT		
DISTRICT OF NEVADA		
LARRY EDWARD ADAMS,	Case No. 2:98-cv-1441-KJD-PAL	
Petitioner,	UNOPPOSED MOTION FOR ENLARGEMENT OF TIME	
vs.	ENLARGEMENT OF TIME	
RENEE BAKER, et al.,	(Death Penalty Case)	
Respondents.		
Petitioner, by and through counsel, GARY TAYLOR, hereby moves this Honorable		
Court for a fourteen (14) day enlargement of	time, up to and including Tuesday, March 6,	
2012, in which to serve and file a reply to R	espondents' Response to Motion to Alter of	
Amend Judgment (Docket No. 263). The res	ponse is currently due on February 21, 2012.	
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This motion is made and based upon th	e provisions of Rule 6(b) of the Federal Rules n of counsel. This is Petitioner's first request	
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	Federal Public Defender State Bar No. 11479 GARY TAYLOR State Bar No. 11031C Assistant Federal Public Defender 411 E. Bonneville, Ste. 250 Las Vegas, Nevada 89101 (702) 388-6577 (Fax) 388-6261 Attorney for Petitioner UNITED STATES I DISTRICT C LARRY EDWARD ADAMS, Petitioner, vs. RENEE BAKER, et al., <u>Respondents.</u> Petitioner, by and through counsel, GA Court for a fourteen (14) day enlargement of	

	Case 2:98-cv-01441-KJD -PAL Document 265 Filed 02/17/12 Page 2 of 4
1	DECLARATION
2	Gary Taylor declares as follows:
3	1. I am an attorney at law, admitted to practice before this Court, employed as an
4	Assistant Federal Public Defender. I represent petitioner Larry Edward Adams in this matter.
5	2. I am an attorney licensed in the State of Texas since 1986. I am board certified
6	in criminal law. I am also licensed in the State of Nevada pursuant to Nev. Sup. Ct. Rule
7	49.11.
8	3. As an Assistant Federal Public Defender, I assist and supervise other attorneys
9	in the investigation and preparation of petitions for writs of habeas corpus and discovery
10	motions. I am assigned to more than eight death penalty cases.
11	4. On February 9, 2012 Respondents filed a Opposition to Motion to Alter of
12	Amend Judgment (Docket No. 263).
13	5. Due to a variety of issues, I am unable to respond to Respondent's pleadings
14	within the time period established by the Court.
15	6. I just completed a comprehensive Motion for Stay and Abeyance in <u>McKenna</u>
16	v. McDaniel, Case No. 2:11-CV-00191-JCM-PAL which was filed on February 16, 2012.
17	7. I filed a Motion to Alter or Amend Judgement (Rule 59(e)) in this case on
18	January 24, 2012.
19	8. Respondents filed their Opposition to Motion to Alter or Amend Judgment on
20	February 9, 2012.
21	9. I have started a reply to respondent's Opposition to Motion to Alter or Amend
22	Judgment in this case, but it is not yet completed.
23	10. I contacted Heather Procter of the Nevada Attorney General's Office,
24	respondents' attorney, today and she does not oppose this request for an extension of time.
25	11. I am requesting an extension of time to complete Mr. Adams' responsive
26	pleadings of at least fourteen (14) days from the date it is currently due. I assure the Court
27	that I am focused on meeting this deadline and my desire is to file the responsive pleadings
28	earlier if possible.
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1	12. This request is not made merely for the purpose of delay, but is made in order
2	to provide the Court with cogent and adequate argument, to ensure adequate representation
3	of Mr. Adams' interests, and to comply with my duty to provide competent representation
4	in this and my other capital cases. Nev. R. Prof. Conduct 1.1.
5	I declare under the penalty of perjury through the laws of the State of Nevada that the
6	foregoing is true and correct and that this document was executed at Las Vegas, Nevada on
7	the 17th day of February, 2012.
8	/a/ Cam Taylor
9	<u>/s/ Gary Taylor</u> Gary Taylor
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18	IT IS SO ORDERED FEB 21, 2012
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20	berge >
21	United States District Judge
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1	Case 2:98-cv-01441-KJD -PAL Document 265 Filed 02/17/12 Page 4 of 4
1	<b>CERTIFICATE OF ELECTRONIC SERVICE</b>
2	In accordance with Rule 5(b)(2)(E) of the Federal Rules of Civil Procedure, the
3	undersigned hereby certifies that on the 17th day of February, 2012, a true and correct copy
4	of the foregoing UNOPPOSED MOTION FOR ENLARGEMENT OF TIME was served by
5	the United States District Court, CM/ECF electronic filing system to:
6	Catherine Cortez Masto Nevada Attorney General
7	Heather D. Procter Assistant Attorney General
8	Email: Hprocter@ag.nv.gov
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10	/s/ Katrina Manzi
11	An employee of the Federal Public Defender
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