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8 Attorneys for Petitioner Carl Bradley.

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

12 CARL BRADLEY,

13 Petitioner,

14 v.

15 ATTORNEY GENERAL OF THE STATE  
OF NEVADA, *et al.*,

16 Respondents.

Case No. 2:13-cv-01196-RFB-GWF

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
AMENDED PETITION FOR WRIT OF  
HABEAS CORPUS**

**(Second Request)**

18 Petitioner Carl Bradley, by counsel, moves this Court for the entry of an Order  
19 extending the time in which she must file an Amended Petition for Writ of Habeas  
20 Corpus by 60 days from May 30, 2017 to, and including, July 28, 2017. This motion  
21 is based on the attached points and authorities and the record.

22 **POINTS AND AUTHORITIES**

23 1. Two weeks ago, counsel sought a short 15-day extension to complete  
24 Bradley's petition explaining that a majority of it was already completed. In the  
25 intervening weeks, counsel continued working on the petition and has made  
26 additional progress on it.

1           2.       When counsel asked for such a short extension, she did not appreciate  
2 how difficult it would be to get ahold of Bradley, who has been moved from USP  
3 Lewisburg in Lewisburg, Pennsylvania, to USP Florence ADMAX in Florence,  
4 Colorado. Counsel had to speak to Bradley before she could file the petition.

5           3.       Thanks to counsel's assistant's concerted efforts to reach someone at the  
6 prison, counsel and Bradley were able to speak by phone on May 25, 2017. Bradley is  
7 unable to call counsel and can only communicate by letter unless counsel can schedule  
8 a telephone call with him, but scheduling a call is difficult.

9           4.       The short request was also based on two upcoming oral arguments in  
10 the Ninth Circuit counsel has the week of June 12. Counsel wanted to complete her  
11 work on Bradley's case in order to carve out time dedicated only to oral argument  
12 preparation beginning June 1.

13          5.       Based on counsel's telephone call with Bradley, her investigation is not  
14 yet complete. Her call coupled with information provided through discovery requires  
15 additional time to determine whether the basis for one of Bradley's claims exists.

16          6.       It is not counsel's intention to frustrate the court by asking for several  
17 short extensions. Rather, this request takes into consideration the work left to be  
18 done on Bradley's case as well as her upcoming schedule. It is not made for the  
19 purposes of delay, but rather in the interests of justice, as well in Bradley's interests.  
20 The requested extension will provide counsel with the time necessary to complete and  
21 file the amended petition.

22          7.       On May 30, 2017, counsel exchanged e-mails with Deputy Jeffrey  
23 Connor, who does not object to this request, with the caveat that his lack of objection  
24 is not to be construed as a waiver or concession of any kind.  
25  
26



1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on May 30, 2017, I electronically filed the foregoing with  
3 the Clerk of the Court for the United States District Court, District of Nevada by  
4 using the CM/ECF system.

5 Participants in the case who are registered CM/ECF users will be served by  
6 the CM/ECF system and include: JEFFREY M. CONNER.

7 I further certify that some of the participants in the case are not registered  
8 CM/ECF users. I have mailed the foregoing by First-Class Mail, postage pre-paid, or  
9 have dispatched it to a third party commercial carrier for delivery within three  
10 calendar days, to the following non-CM/ECF participants:

11 Carl Bradley  
12 No. 43838-048  
13 USP Florence ADMAX  
14 U.S. Penitentiary  
15 PO Box 8500  
16 Florence, CO 81226

17 */s/ Jessica Pillsbury*  
18 \_\_\_\_\_  
19 An Employee of the  
20 Federal Public Defender  
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24  
25  
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