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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**

**(Third 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 30 days from July 28, 2017 to, and including, August 28, 2017. This motion  
21 is based on the attached points and authorities and the record.

22 **POINTS AND AUTHORITIES**

23 1. Counsel has completed a draft of Bradley's amended petition in line with  
24 counsel's last request for an extension. However, difficulty communicating with  
25 Bradley due to his location at USP Florence ADMAX in Florence, Colorado, has  
26 continued to plague us.

1           2.     Counsel and Bradley have been communicating by phone and letter.  
2 Bradley has quickly responded to past requests for information.

3           3.     During a telephone call with Bradley earlier this week, which ended  
4 somewhat abruptly, counsel learned that Bradley never received one of her letters  
5 seeking information.

6           4.     The day of our telephone call, July 26, 2017, counsel sent Bradley a  
7 follow-up letter, which, in part, reiterated the original request. The last letter counsel  
8 sent that Bradley received took a week to reach him from the day counsel sent it.

9           5.     The requested information, once received, will assist in the investigation  
10 and help counsel determine whether a factual basis for one of Bradley's claims exists.  
11 Should the investigation be fruitful, counsel will add the claim(s) to Bradley's  
12 petition.

13          6.     This request is not made for the purposes of delay, but rather in the  
14 interests of justice, as well in Bradley's interests.

15          7.     On July 28, 2017, counsel exchanged e-mails with Deputy Jeffrey  
16 Connor, who does not object to this request, with the caveat that his lack of objection  
17 is not to be construed as a waiver or concession of any kind.

18          8.     For the reasons above, as well as the record in this case, Bradley  
19 respectfully asks this Court to grant his request for an extension of time and enter  
20 an order requiring the amended petition be filed on or before August 28, 2017.

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1 Dated this 28th day of July, 2017.

2 Respectfully submitted,

3 RENE L. VALLADARES  
4 Federal Public Defender

5 */s/ Amelia L. Bizzaro*  
6 AMELIA L. BIZZARO  
7 Assistant Federal Public Defender

8 IT IS SO ORDERED:

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10 \_\_\_\_\_  
11 RICHARD F. BOULWARE, II  
12 United States District Judge

13 DATED this 1st day of August, 2017.

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on July 28, 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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