

1 RENE L. VALLADARES  
 Federal Public Defender  
 2 Nevada State Bar No. 11479  
 3 KIMBERLY SANDBERG  
 Assistant Federal Public Defender  
 4 New York State Bar No. 5152863  
 411 E. Bonneville, Ste. 250  
 5 Las Vegas, Nevada 89101  
 (702) 388-6577  
 6 (702) 388-5819 (fax)  
 7 Kimberly\_Sandberg@fd.org  
 8 Attorney for Petitioner Leonard W. Hill

9 UNITED STATES DISTRICT COURT  
 10 DISTRICT OF NEVADA

12 LEONARD W. HILL,  
 13 Petitioner,  
 14 v.  
 15 BRIAN WILLIAMS, ET AL,  
 16 Respondents.

Case No. 2:17-cv-00155-APG-VCF  
**UNOPPOSED MOTION FOR  
 EXTENSION OF TIME TO FILE  
 AMENDED PETITION FOR WRIT OF  
 HABEAS CORPUS**  
**(FOURTH REQUEST) ORDER**

17  
 18 Petitioner Leonard W. Hill, by counsel, moves this Court for the entry of Order  
 19 extending the time within which he must file an Amended Petition for Writ of Habeas  
 20 Corpus by two weeks from April 13, 2018 to and including April 27, 2018. Hill's  
 21 request is based on the record in this case and the attached Points and Authorities.  
 22  
 23  
 24  
 25  
 26

1 **POINTS AND AUTHORITIES**

2 1. On August 14, 2017, the Office of the Federal Public Defender was  
3 appointed as counsel for Petitioner, Leonard W. Hill (ECF No. 7). Undersigned  
4 counsel filed her appearance on September 14, 2017 (ECF No. 10).

5 2. This motion is not filed for the purposes of delay but in the interests of  
6 justice, as well as in the interests of Hill.

7 3. Hill's Amended Petition is drafted, but in completing final edits, counsel  
8 realized that she should meet with her client, Hill, to discuss several of the claims  
9 and clarify several issues before filing. Counsel fully expects that this meeting and  
10 any potential changes to the petition can be completed within two weeks.

11 4. Senior Deputy Attorney General Heather D. Procter does not object to  
12 this request. However, Ms. Procter expressed that her lack of objection does not  
13 constitute a waiver of any procedural defenses Respondents may wish to raise in  
14 response to the amended petition including, but not limited to, timeliness, procedural  
15 default, and questions of exhaustion.

16 5. The requested extension is necessary for counsel to complete her review  
17 of the case and to draft and file the Amended Petition. For these reasons, as well as  
18 the record in this case, Mr. Hill respectfully asks this Court to grant his request to  
19 extend the time for filing an Amended Petition by two weeks until April 27, 2018.  
20  
21  
22  
23  
24  
25  
26

1 Dated this 13th day of April, 2018.

2 Respectfully submitted,

3 RENE L. VALLADARES  
4 Federal Public Defender

5 */s/ Kimberly Sandberg*

6 KIMBERLY SANDBERG  
7 Assistant Federal Public Defender

8  
9 IT IS SO ORDERED:

10  
11 

12 United States District Judge

13 Dated: April 16, 2018.

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26