1 2 3 4 5 6 7 8 9 10 11	 Federal Public Defender Nevada State Bar No. 11479 *Emma L. Smith Assistant Federal Public Defender Illinois State Bar No. 6317192 Jeremy C. Baron Assistant Federal Public Defender District of Columbia Bar No. 1021801 411 E. Bonneville Ave. Suite 250 Las Vegas, Nevada 89101 (702) 388-6577 Emma_Smith@fd.org *Lead attorney for Petitioner Terry Dixon 	
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	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
13	Terry D. Dixon,	T INEVADA
14	Petitioner,	Case No. 3:13-cv-00248-RCJ-WGC
15		
16	V.	Order Granting Unopposed motion for extension of time in which to
17	Renee Baker, et al.,	file second amended petition (ECF No. 57)
18	Respondents.	(First request)
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20	Terry Dixon respectfully moves this Court for an extension of time of sixty (60)	
21	days, from February 22, 2021, to and including April 23, 2021, in which to file a	
22	second amended petition.	
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ARGUMENT

1. Following state court proceedings, this Court reopened this case and allowed Mr. Dixon to file a second amended petition. The second amended petition is currently due on February 22, 2021.

2. Counsel respectfully suggest additional time remains necessary to properly prepare the second amended petition. Lead counsel for Mr. Dixon, Emma Smith, is currently out of the office on maternity leave and is expected to return in late March. Following her return, counsel will need to consult between themselves and with Mr. Dixon about the contents of the second amended petition. An extension is therefore necessary to give counsel, including Ms. Smith, adequate time to prepare and file the second amended petition.

3. Undersigned counsel has had many additional professional obligations in the past couple months and has many additional professional obligations in the next two months. However, because undersigned counsel's caseload is not particularly relevant to this extension motion, undersigned counsel isn't providing a summary of his caseload here.

4. On February 19, 2021, undersigned counsel contacted Senior Deputy Attorney General Jessica E. Perlick and informed her of this extension request. As a matter of professional courtesy, Ms. Perlick had no objection to the request. Ms. Perlick's lack of objection shouldn't be considered a waiver of any procedural defenses or statute of limitations challenges, or construed as agreeing with the accuracy of the representations in this motion.

5. In sum, counsel request an additional sixty (60) days, up to and including April 23, 2021, in which to file the second amended petition. This is counsel's first request for an extension of time to file the petition. This motion isn't filed for the purposes of delay, but in the interests of justice, as well as in Mr. Dixon's interest. Counsel respectfully ask the Court to grant the requested extension.

Dated February 22, 2021. Respectfully submitted, Rene L. Valladares Federal Public Defender $\mathbf{5}$ /s/ Jeremy C. Baron Jeremy C. Baron Assistant Federal Public Defender $\mathbf{7}$ IT IS SO ORDERED: ROBERT UIJONES United States District Judge Dated: February 24, 2021.