

July 25, 2017

Hon. Jose L. Linares, Chief
U.S. D. J.
Martin Luther King Jr.
Federal Building and Courthouse
50 Walnut Street, P.O. Box 999
Newark, NJ 07101-0999

Re: Paul Bergin v. United States
Civil No.: 16-3040 (JLL)
Criminal No.: 09-369 (JLL)

Dear Honorable Chief Judge Linares:

Please be informed that on the above date I received the government's requests for an extension to respond to petitioner's Motion to Vacate, Set Aside, or Correct a Sentence made pursuant to 28 U.S.C. § 2255.

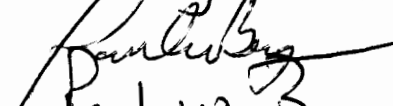
Please excuse the fact that this letter is handwritten, but there are no typewriters, word processors or other means available for me to respond. I sincerely apologize.

This Honorable Court acted in the interests of justice and Ordered the government to respond to my motion by 31 July 2017. Most importantly,

based upon the government's plethora of adjournments, continuances and delays and the inordinate amount of time the government had to respond, this Court Ordered "no further delays or continuances."

I vehemently pray, plead and implore the Court to deny the government's adjournment request. Despite the government's veiled and baseless excuses, as well as fabricated accusations, they must meet this deadline. I am confident in the legal and factual merits of my motions and am incarcerated under the most archaic, sadistic and oppressive conditions known to humanity. Mark Gyne has had an extraordinary amount of time to familiarize himself with the record and all three (emphasis added) counsel have had more than sufficient amount of time to prepare a response.

For the aforementioned reasons I object most vociferously to any further adjournments. Moreover, I most respectfully request appointment of counsel on this motion and have submitted my paramount position previously; but now ask this Honorable Court to consider the conditions of confinement.

Thank you Most respectfully,

 Paul W. Bergin



GENERAL INVESTIGATIVE DIVISION

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U.S. Penitentiary MAX
P.O. Box 8500
Florence, CO. 81226-8500

Cm-17-065003-0

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