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U.S. Department of Justice
United States Attorney
District of New Jersey

AT 8:30 _____ M
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June 6, 2014

Hon. Joel A. Pisano
United States District Judge
Clarkson S. Fisher Federal Building and U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

*For review
J.P.*

Re: William Baskerville v. United States
Civ. No. 13-5881 (JAP)
~~Crim. No. 03-836 (JAP)~~

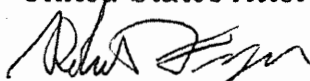
Dear Judge Pisano:

The Government is working diligently to respond to the allegations contained in the Petitioner's motion pursuant to 28 U.S.C. § 2255, in the above-referenced matter. As way of an update, the Government has now met, pursuant to the Court's order filed February 24, 2014, with Mark Berman, Petitioner's appellate counsel. Mr. Berman is in the process of reviewing a declaration prepared as a result of the information he provided at that meeting. Additionally, the Government has more recently had a lengthy interview with Petitioner's trial counsel, Carl Herman and Kenneth Kayser, after they had an opportunity to review their case files. The Government is working on a proposed declaration that summarizes the information obtained during that meeting. The Government believes that these declarations will address the factual assertions in the Petitioner's motion and may allow the Court to decide the Petitioner's motion without the need of a hearing.

Because of the time-consuming process of reviewing the voluminous record from the 2007 trial, the interview process necessary to respond to the numerous allegations contained in the Petitioner's motion, and the summertime schedule of the various attorneys involved, the Government respectfully makes this second request for an adjournment of the date for the Government's response.

Accordingly, the Government requests until September 17, 2014 in which to file its response to the Petitioner's motion. Thank you for your consideration of this request.

Respectfully Submitted,
PAUL J. FISHMAN
United States Attorney



BY: ROBERT L. FRAZER
Assistant U.S. Attorney

CC: William Baskerville, *pro se*