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March 7, 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

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JF

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

Dear Judge Pisano:

The Government is in receipt of Petitioner's motion pursuant to 28 U.S.C. § 2255, in the above-referenced matter. The Government respectfully requests an adjournment of the date for the Government's response.

As the Court is aware, the Petitioner, in his motion, has made numerous allegations that his trial and appellate counsel were ineffective, among other issues that he raised in seeking relief under 28 U.S. C. 2255. By Order of the Court filed December 20, 2013, the Court set March 21, 2014 as the date the Government's response to Petitioner's motion is due.

In order to respond to Petitioner's claims, the Government moved the Court to order Petitioner's trial and appellate counsel to submit to interviews with the Government to determine factual issues regarding the ineffective assistance claims. Docket No. 10. The Court granted the Government's motion by order filed February 24, 2014. Docket No. 11.

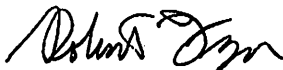
From February 25, 2014 to March 3, 2014, I was engaged on trial before the Hon. Kevin McNulty. I now need time to reach out to Petitioner's trial counsel, Mr. Carl Herman and Mr. Kenneth Kayser, and his appellate counsel, Mr. Mark Berman, to gather the information needed. Additionally, after reviewing Petitioner's motion, certain parts of the trial record Petitioner cites in support of his claim are not in the possession of the Government. The Government will need to order the transcripts from those portions of the trial cited by Petitioner that the Government does not have.

Accordingly, the Government requests until on or about June 23, 2014 in which to file its response to the Petitioner's motion so it may obtain a complete trial transcript and to gather information from Petitioner's counsel.

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*