

United States District Court
For the district of New Jersey

Civil No. 13-5881 (JAP)

William Basketville,)
Movant,)
)
v.)
)
United States Of America,)
Resondent.)
)
)

RECEIVED

FEB 23 2015

AT 8:30
WILLIAM T. WALSH M
CLERK

MOTION for Extention Of time

William Baskerville, Movant, Pro-se, respectfully request an extention of time, until May 20, 2015. Movant states the following insupport of this motion:

Movant filed a timely §2255 Motion 9-24-13 which was filed on 10-2-13. Dkt. Entry 1. And the Respondent was ordered to file its opposition no later than 3-21-14. The Respondent was granted a number of Time Extention. And finally on 10-6-14 , the Respondent filed its opposition brief. See Dkt. Entrys' 7,10,12,15,16.

The Court ordered Movant to reply by December 29, 2014. and movant was granted an additional 60 days.

Movant presents the following agrument for good cause that he should be given until May 20th 2015. to file his reply brief:

Argument

The Court may grant a request for Extension of time for "cause shown" Fed. R. Civ P. 6(b) or what ever rule this court deems applicable.

Movant Request additional time to Reply to the Government(Respondent's) §2255 opposition motion. The legal issues to be addressed by the reply motion are complex and require additional legal research and can not be completed before the deadline.

More importantly movant needs additional time to secure counter affidavits that will be contradicting material facts that's indispute pertaining to the respondent's opposition.

Movant access to legal materials and type writers is tremendously limited. Because this jail has been on at least several lock downs with in the last month of January and up to date.

In addition there is over 1500 inmates on this compound. With only 10-12 legal computer terminals. And most of the time the wait to use the computers are so long that each computer is set on a two hour timer per use.

The type writers' waiting line is also long and time consuming. In my unit we only have one type writer that's always breaking down and needs repairing.

Also this jail is split whereas only half the population is allowed every other day to attend the legal library.

Movant don't believe the government would be prejudice by granting this motion. In particular because the government was giving a number of extension in which Movant never objected or contested.

In conclusion, movant respectfully request that this court extend the deadline until May 20, 2015. And as stated above movant has shown good cause as to why this motion should be granted. And this motion is not to delay the proceedings. See Fed. R.Civ.P.6(b)

Respectfully submitted



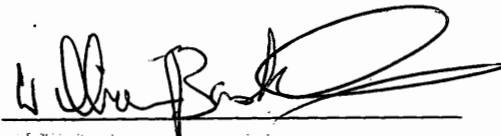
William Baskerville
Inmate no.25946-050
FCC Coleman USP #1
P.O.Box 1033
Coleman Fl 33251-0879

Certificate Of service

I certify that a copy of the "Motion for Extention of time" was mailed to United States Attorneys office of New Jersey. Robert L. Frazer and Joseph N Minish, District attorneys. whose address is 970 broad Street, suite 700. Newark New Jersey 07102-2535. this motion was mailed on 2-20-15.

Pursuant to Houston v. Lack 487 U.S. 266(1988) this motion is deemed to be filed at the time it was delivered to the prison authority for forwarding to the court.

Respectfully Submitted



William Baskeville
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2-20-15

R E C E I V E D

FEB 23 2015

United States District Court For the
District Of New Jersey
Office of the Clerk of the Court
402E. States Street, Rm#2020
Trenton , NJ 08608


AT 8:30 _____M
WILLIAM T. WALSH
CLERK

RE: Filing Extention MOTion and mailing back a copy.

Dear Clerk, good day! I request that you file this accompanied copy of my MOTion to Extend time to Reply to Government's opposition brief.

In addition, accompanied with this request is an extra copy of the motion and a self addressed stamped envelope. please Stamp "filed or received" on the extra motion and mail back to me.

Thank you for your prompt action on this request.

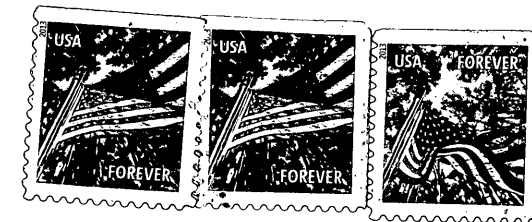

William Baskerville

William Baskerville #25946-050

Federal Correctional Complex USP#1

P.O.BOX 1033

Coleman FL 33521



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the District of New Jersey
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