

JAMES C. ANDERSON
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

NATHANIEL SOLON,)	
)	
Petitioner,)	Civil No. 11-CV-303-B
)	
v.)	Criminal No. 07-CR-032-B
)	
UNITED STATES OF AMERICA,)	
)	
Respondent.)	

**FOURTH MOTION FOR EXTENSION OF TIME TO RESPOND TO
PETITIONER'S MOTION UNDER 28 U.S.C. § 2255**

Respondent United States of America, by and through its attorney, Assistant United States Attorney James C. Anderson, does hereby move the court for an Order granting the United States an additional 33 days in which to file it's response to the § 2255 petition filed by the Petitioner/Defendant. In support of this request, counsel states:

1. That the United States' response motion is currently due on March 14, 2012. Three previous extension of time have been requested by the United States.
2. In addition to managing his current criminal case load, the undersigned counsel spent considerable time on other pressing matters during the month of February, including preparing for, and going to trial, the week of February 21, 2012, before the Honorable Scott W. Skavdahl in the

case of *United States v. Brett McSherry*; Docket No. 11-CR-00233-S. In the month of March, undersigned is currently preparing for his presentation of five cases to the Grand Jury the week of March 13, 2012.

3. Undersigned counsel is researching and writing his response in the above matter. However, given the nature, scope, and extent of the motion filed by this Pro Se Petitioner, the undersigned will not be able to conduct the necessary legal research, review of transcripts, and other necessary work to understand with any precision these issues being raised and then to prepare a satisfactory response by the March 14, 2012, deadline.

4. The undersigned respectfully requests a 33 day extension within which to file its response motion in order that Respondent's case may be fully and adequately researched and briefed and presented to this Court for its consideration.

5. Petitioner is presently in custody serving a 72-month term of imprisonment.

For the foregoing reasons, the undersigned counsel for the United States respectfully requests an extension of 33 days to April 16, 2012, to file its response motion in this case.

DATED this 14th day of March, 2012.

Respectfully submitted,

CHRISTOPHER A. CROFTS
United States Attorney

By: /s/ James C. Anderson
JAMES C. ANDERSON
Assistant United States Attorney

CERTIFICATE OF SERVICE

This is to certify that on March 14, 2012, a true and correct copy of the foregoing **FOURTH MOTION FOR EXTENSION OF TIME** was served by United States mail, duly enveloped and sufficient postage prepaid, upon:

Nathaniel Solon, # 07069-091
USP Beaumont
U.S. Penitentiary
P. O. Box 26030
Beaumont, TX 77720

/s/Louisa G. Cruz
United States Attorney's Office