

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.)	

**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 60 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 October 6, 2011. No previous extensions of time have been sought by the United States.
2. The undersigned counsel spent considerable time on other pressing matters during the month of September, including preparing for and presenting eight cases to the Grand Jury the week of September 15, 2011. In addition, undersigned counsel is currently engaged in researching

and preparing two responses which are due to the court the week of October 3, 2011; *United States v. Kevin Myers*, USDC No. 05-CR-0078-J; and *United States v. Peter Humphries*, USDC No. 11-CV-00249-F.

3. The undersigned respectfully requests a 60 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.

4. 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 60 days to December 5, 2011, to file its response motion in this case.

DATED this 3rd day of October, 2011.

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 October 3, 2011, a true and correct copy of the foregoing **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/ Vicki Powell
United States Attorney's Office