

SIXTH DISTRICT APPELLATE PROGRAM
DALLAS SACHER
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Attorneys for Appellant,
WILLIAM GIPSON

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SIXTH APPELLATE DISTRICT

PEOPLE OF THE STATE OF CALIFORNIA,]	
]	NO. H022261
Plaintiff and Respondent,]	(SANTA CLARA CO.
]	SUPERIOR COURT
vs.]	NO. 177547)
]	
WILLIAM GIPSON,]	REQUEST FOR
]	EXTENSION OF
Defendant and Appellant.]	TIME TO FILE
]	OPENING BRIEF
]	

TO THE PRESIDING JUSTICE OF THE COURT OF APPEAL,
SIXTH APPELLATE DISTRICT:

Appellant's opening brief is due for filing on March 21, 2001. For the reasons stated in the attached declaration, appellant respectfully requests an extension of time until April 20, 2001.

Dated: March ____, 2001 Respectfully submitted,

DALLAS SACHER
Attorney for Appellant,
ARMANDO PERAZA SALAZAR

DECLARATION OF DALLAS SACHER

I am an attorney licensed to practice in California. I am the attorney for appellant, William Gipson.

On February 9, 2001, the record on appeal was filed. The record includes a clerk's transcript of 37 pages and a reporter's transcript of 113 pages. To date, I have been unable to perform any work on this case.

Since the filing of the record, I have prepared and filed a petition for review in *People v. Ransom*, H018330. I have also prepared and filed a federal petition for writ of habeas corpus in *Hill v. Roe*, No. 01-20148JF. I have also begun the preparation of a federal petition for writ of habeas corpus on behalf of Mr. Alphonso Bell who is serving a sentence of 30 years to life.

In addition, I have also read a number of records on appeal and prepared assisting memos for panel attorneys. I have also performed a large variety of tasks on many of the approximately 168 cases which presently constitute my caseload. Finally, I have also undertaken a number of supervisory and administrative tasks attendant to my role as Assistant Director of the Sixth District Appellate Program.

Finally, my secretary will be on vacation from March 6, 2001 to March 20, 2001. I prepare my briefs in writing and my secretary types them. Given my secretary's absence, it will be impossible for me to meet the present deadline of March 21, 2001.

Given the foregoing circumstances, I am compelled to request a 30 day extension of time. I am confident that the opening brief will be filed within the requested time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this ____ day of March, 2001, at Santa Clara, California.

DALLAS SACHER

ORDER

FOR GOOD CAUSE SHOWN, the time in which to file appellant's opening brief is extended to April 20, 2001.

PRESIDING JUSTICE OF THE COURT OF APPEAL

PROOF OF SERVICE

I declare that I am over the age of 18, not a party to this action and my business address is 100 N. Winchester Blvd., Suite 310, Santa Clara, California 95050. On the date shown below, I served the within REQUEST FOR EXTENSION OF TIME to the following parties hereinafter named by:

X Placing a true copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Santa Clara, California, addressed as follows:

Attorney General's Office
455 Golden Gate Avenue
Suite 11,000
San Francisco, CA 94102-3664
[Counsel for People of the State of California]

Mr. William Gipson
B-79344
P. O. Box 689
Soledad, CA 93960-0689

I declare under penalty of perjury the foregoing is true and correct. Executed this ___ day of March, 2001, at Santa Clara, California.

Sue Yarbrough