

Rene L. Valladares  
Federal Public Defender  
District of Nevada

Lori C. Teicher  
First Assistant

Randolph M. Fiedler  
Assistant Federal Public Defender



**FEDERAL PUBLIC  
DEFENDER**  
— District of Nevada —

411 E. Bonneville Ave.  
Suite #250  
Las Vegas, NV 89101  
Tel: 702-388-6577

March 5, 2019

Hon. Scott S. Harris  
Clerk  
Supreme Court of the United States  
1 First Street, N.E.  
Washington, DC 20543

Re: *William Gittere, Warden, et al., v. Jose Lorente Echavarria*  
Case No: 18-756

Dear Mr. Harris:

Respondent Jose Lorente Echavarria requests a 28-day extension of time in which to file his Brief in Opposition in this capital case. Mr. Echavarria's Brief in Opposition is currently due on March 15, 2019. This is Mr. Echavarria's second request for an extension of time. If this request is granted, the new filing date would be April 12, 2019.

This request is necessary because, though I have made progress on completing the Brief in Opposition, I have not been able to devote sufficient time to satisfactorily complete it. This request is not made for the purposes of delay, or any other invalid purpose, but only to ensure that my office provides the competent and diligent representation that Mr. Echavarria has a right to. *See Nev. Rules of Prof'l Conduct 1.1, 1.3.*

Since my last request, I have had the following case-related responsibilities: on January 18, 2019, a Reply to Responsive Brief Addressing Issues on Remand in *Ybarra v. Baker*, No. 3:00-cv-0233-GMN-VPC (D. Nev.); on January 25, 2019, an argument in *Vanisi v. State*, No. CR98-0516 (2d Jud. Dist. Ct. Nev.); on January 30, 2019, a Motion for Stay and Abeyance in *Johnson v. Gittere*, No. 2:18-cv-00740-

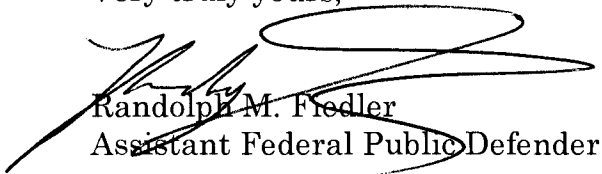
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JAD-NJK (D. Nev.); on February 4, 2019, a Reply to Closing Brief in *Rogers v. Gittere*, No. 3:02-cv-00342-GMN-VPC (D. Nev.); on February 6, 2019, a Motion to Enforce Civil Discovery Rules and Notice of Motion in *Adams v. Gittere*, No. 85C069704 (8th Jud. Dist. Ct. Nev.); on February 13, 2019, a Petition for Writ of Habeas Corpus (Post-Conviction) and Notice of Motion in *Johnson v. Gittere*, No. A-19-789336-W (8th Jud. Dist. Ct. Nev.). In addition to these filings, I have had investigative and legal research work in anticipation of an evidentiary hearing in *Adams v. Filson*, No. 85C069704 and in *Williams v. Filson*, No. 2:98-cv-00056-APG-VCF (D. Nev.). I also had had to devote time to an upcoming deadline, April 8, 2019, for an Amended Petition in *Moore v. Gittere*, No. 2:13-cv-00655-JCM-CWH (D. Nev.). Finally, in *Hampton v. Ryan*, No. CV-14-02504-PHX-ROS (D. Ariz.), the district court recently denied relief, and so I must spend at least part of the next 28 days considering whether a Rule 59(e) motion must be filed, and if so, I must also devote time to drafting and filing that document, which is a jurisdictional deadline that cannot be extended.

Though I anticipated some of these responsibilities at the time of my last extension of time request, I underappreciated how much time they would require. Additionally, many of these responsibilities I did not anticipate. As a result, I have not devoted adequate time to Mr. Echavarria's Brief in Opposition.

Earlier today, I contacted opposing counsel in this matter, Assistant Solicitor General Jeffrey M. Conner, and he indicated no opposition to this request.

Very truly yours,



Randolph M. Fredler  
Assistant Federal Public Defender

Service List:

Aaron Ford  
Attorney General of Nevada  
Jeffrey M. Conner  
Assistant Solicitor General  
100 North Carson Street  
Carson City, NV 89701

Counsel for Respondents