IN THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF ILLINOIS

YORIE VON KAHL,)
Petitioner,))
v.) Case No. 1:18-cv-1245
)
STEVE KALLIS, Warden)
)
Respondent.)

THE UNITED STATES' MOTION FOR EXTENSION OF TIME TO FILE RESPONSE

NOW COMES the United States of America, by John E. Childress, United States Attorney for the Central District of Illinois, and Katherine V. Boyle, Assistant United States Attorney, and hereby requests additional time in which to file its response on behalf of Steve Kallis to the Petitioner Yorie Kahl's Petition for Habeas Corpus Pursuant to 28 U.S.C. § 2241, and in support of this motion states as follows:

- 1. On July 2, 2018, the Petitioner Yorie Kahl filed his Petition for Habeas Corpus Pursuant to 28 U.S.C. § 2241, along with a supporting memorandum. (R.1,R.2)
- 2. On July 6, 2018, this Court ordered the United States to respond to the Petition by July 27, 2018. (R.3)
- 3. Due to the nature of the claims involved in the petition, the United States requested assistance and documents from the Federal Bureau of Prisons and from the U.S. Parole Commission. While the United States has received a response from the Federal Bureau of Prisons, the U.S. Parole Commission has requested an additional 30

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days to compile information and documents related to the petitioner's claims.

4. The United States therefore respectfully requests a 45-day extension of time, until September 10, 2018, in order to obtain information and documents from the U.S. Parole Commission and to incorporate that information in its response to the petition.

WHEREFORE, the United States respectfully requests that this Court grant this Motion and allow for a 45-day extension of time, until September 10, 2018, to file its response.

Respectfully submitted:

JOHN E. CHILDRESS *United States Attorney*

s/ Katherine V. Boyle
Katherine V. Boyle
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CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and I hereby certify that on this same date I caused a true and correct copy of the motion to be sent via United States Mail, first class and postage prepaid, addressed to the Petitioner:

Yorie Von Kahl 04565-059 PEKIN FEDERAL CORRECTIONAL INSTITUTION Inmate Mail/Parcels PO BOX 5000 PEKIN, IL 61555

s/ Katherine V. Boyle
Katherine V. Boyle