

**FILED**

ELECTRONICALLY

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA  
SECOND APPELLATE DISTRICT, DIVISION EIGHT

Dec 27, 2012

JOSEPH A. LANE, Clerk

K LEWIS

Deputy Clerk

PEOPLE OF THE STATE OF CALIFORNIA,  
  
Plaintiff and Respondent,  
  
v.  
  
MICHAEL FRANK GOODWIN,  
  
Defendant and Appellant.

Case No. B197574

(Los Angeles Superior Court  
Case No. GA052683)

**APPLICATION FOR 60-DAY EXTENSION OF TIME**

TO FILE: Respondent's Brief

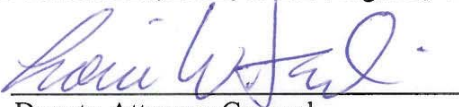
TO: February 25, 2013

I need more time for the following reason(s):

**Please see Attachment for Statement of Reasons.**

I declare under penalty of perjury that the statement of reasons contained in the Attachment to this Application is true and correct.

Executed on December 26, 2012, at Los Angeles, California.

Signature:   
Deputy Attorney General

Name: Louis W. Karlin  
State Bar No. 136708

Record Size	Volumes	Pages	Date Filed
Appendix/Clerk's Transcript:	8	2,188	5/21/2007
Reporters Transcript:	24	4,777	5/21/2007
Augmentation/Other:	5 CT	1,166	11/13/2007

Last brief filed by any party: Appellant's Opening Brief on November 27, 2012

# of previous extensions: None

Last granted to: N/A

EXTENSION OF TIME IS:



GRANTED TO 2/25/13

DENIED

DATED: Dec 27, 2012

**BIGELOW, P.J.**

Presiding Justice

**ATTACHMENT TO APPLICATION FOR EXTENSION OF TIME**

Re: People v. Michael Frank Goodwin Appeal No. B197574  
(Los Angeles Superior Court No. GA052683)

This appeal, which follows appellant's convictions for two counts of special circumstance murder, presents 17 issues (with numerous subparts) along with a cumulative error claim, based on a record totaling approximately 5,500 pages of reporter's transcripts. Appellant's oversized opening brief is 510 pages long. It appears that appellant received approximately eight 30-day extensions of time, along with a 321-day extension and a 15-day extension to file the opening brief. Briefing was also stayed numerous times for record augmentation.

My obligations in other previously assigned matters prevented me from completing the respondent's brief before the current deadline. During the past 30 days, I filed the respondent's brief in *People v. McGraw*, B236410, which involved five issues and 934 pages of reporter's transcripts, and *People v. Vasquez*, B242760, which involved three issues and 1,265 pages of reporter's transcripts. I also completed the respondent's brief in *People v. Martinez*, B240574, and I am in the process of completing the brief in *People v. Quiroz*, B241039. After that, I have three previously assigned matters: (1) a response to the habeas corpus petition in *Archibald v. Spearman*, CV 12-9300 ODW, pending in the United States District Court, Central District of California; (2) the answer brief in *Kasper v. Cal. Dept. of Corrections & Rehabilitation, et al.*, 10-56527, pending in the Ninth Circuit Court of Appeals; and (3) various issues in a motion to dismiss the Second Amended Habeas Corpus Petition in the capital matter of *Curtis Fauber v. Kevin Chappell, Warden*, CV 95-6601-GW, pending in the United States District Court.

For the foregoing reasons, I respectfully request a 60-day extension of time to file the respondent's brief in this case.

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AWT - Extension of Time CofA 2nd (W).doc

**DECLARATION OF SERVICE BY U.S. MAIL**

Case Name: **People v. Michael Frank Goodwin**  
Case No.: **B197574**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter.

On December 27, 2012, I electronically filed the attached **APPLICATION FOR EXTENSION OF TIME** with the Clerk of the Court using the Online Form provided by the California Court of Appeal, Second Appellate District.

I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On December 27, 2012, I served the attached **APPLICATION FOR EXTENSION OF TIME** by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 300 South Spring Street, Suite 1702, Los Angeles, CA 90013, addressed as follows:

**Gail Harper**  
**Attorney at Law**  
**P.O. Box 330057**  
**San Francisco, CA 94133**

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on December 27, 2012, at Los Angeles, California.

\_\_\_\_\_  
E. Obeso  
Declarant

  
\_\_\_\_\_  
Signature