

BILAL A. ESSAYLI
Acting United States Attorney
CHRISTINA T. SHAY
Assistant United States Attorney
Chief, Criminal Division
MATTHEW O'BRIEN (Cal. Bar No. 261568)
Assistant United States Attorney
Environmental Crimes and Consumer Protection Section
1400 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 894-8644
Facsimile: (213) 894-0141
E-mail: Matthew.O'Brien@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff/Respondent,

v.

No. 5:18-CR-00114-JGB
5:21-CR-00170-JGB
5:24-CV-02550-JGB
5:24-CV-02552-JGB

CARL BRADLEY JOHANSSON,
aka "Brad Johnson,"
aka "Carl Johnson,"
aka "C. Brad Johanson,"
aka "Jay Johnson,"
aka "Keith Golatta,

Defendant/Petitioner.

GOVERNMENT'S APPLICATION TO FILE
BRIEF IN EXCESS OF 25 PAGES;
DECLARATION OF MATTHEW O'BRIEN

Plaintiff United States of America, by and through its counsel
of record, the Acting United States Attorney for the Central District
of California and Assistant United States Attorney Matthew O'Brien,
hereby applies to the Court, pursuant to Local Rule 11-6, for leave
to file its Opposition to Defendant Carl Bradley Johansson's Motion
to Vacate, Set Aside, or Correct Sentence Pursuant to 28 U.S.C.
§ 2255, which is a brief in excess of 25 pages, for good cause.

1 This application is based on the attached declaration of Matthew
2 O'Brien, and the files and records in these cases, and such further
3 evidence and argument as the Court may permit.

4 As of the time of the filing of this application, government
5 counsel has not been able to determine petitioner's position.

6 Dated: August 28, 2025

Respectfully submitted,

7 BILAL A. ESSAYLI
Acting United States Attorney

8 CHRISTINA T. SHAY
9 Assistant United States Attorney
Chief, Criminal Division

10
11 /s/
MATTHEW W. O'BRIEN
12 Assistant United States Attorney

13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF MATTHEW O'BRIEN

I, MATTHEW O'BRIEN, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in this matter.

2. I make this declaration in support of the government's application to file the government's Opposition to Petitioner's Motion to Vacate, Set Aside, or Correct Sentence Pursuant to 28 U.S.C. § 2255 (the "Opposition"), which is a brief in excess of 25 pages, pursuant to Local Rule 11-6.

3. Petitioner's Motion is 61-pages long, not including exhibits. It alleges a wide range of ineffective assistance of counsel by three of Petitioner's attorneys in two different criminal cases over a period of several years in both the district court and on appeal.

4. I have attempted to present the government's arguments in opposition to Petitioner's Section 2255 Motion as concisely as possible. Because the underlying proceedings were before a different judge (the Honorable Virginia A. Phillips) prior to reassignment, I believe it is necessary to explain the underlying proceedings in more detail than ordinarily might be necessary.

5. I do not believe that further reductions to the government's Opposition are possible (1) without compromising the integrity of the government's presentation of the arguments in its brief; and (2) without depriving this Court of sufficient background regarding the proceedings before Judge Phillips, in order to facilitate this Court's adjudication of Petitioner's Section 2255 Motion.

6. For the reasons set forth above, the government respectfully seeks leave of this Court to file a brief that is 38 pages in length.

7. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: August 28, 2025

/s/

 MATTHEW O'BRIEN
 Assistant United States Attorney