

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION**

UNITED STATES OF AMERICA

V.

GLADYS HARUN,
Defendant.

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) Case No. 3:22-CR-00009-DHB-BKE

UNOPPOSED MOTION FOR THIRTY DAYS (30)
TO SUBMIT THE JOINT STATUS REPORT

COMES NOW, Defendant Gladys Harun, by and through undersigned counsel, and files this Unopposed Motion for Thirty Days (30) to Submit the Joint Status Report presently scheduled to be submitted by February 14, 2023. In support thereof, Ms. Harun shows the following:

(1)

Ms. Harun is named in a seven-count Superseding Indictment charging her with False Declaration (18 U.S.C. § 1623); Wire Fraud (Two Counts) (18 U.S.C. § 1343); and Money Laundering Transactions Over \$10,000.00 (Four Counts) (18 U.S.C. § 1957. (Doc. 38.)

(2)

On February 9, 2023, undersigned counsel filed the Motion to Substitute Counsel and Motion to Appear Pro Hac Vice in the above-captioned matter, and on

February 13, 2023, the Court granted said Motion.

(3)

Counsel has been in communication with Ms. Harun's prior counsel, Dale Robert Busbee, regarding the discovery and is expecting to receive it in the coming days.

(4)

Additional time is needed to receive and review discovery, to determine the need to file additional motions, and to determine whether this case can be resolved without trial.

(5)

Counsel has also been in communication with Assistant United States Attorney Louis Hamner regarding the status of this case, and he does not object to the Court's granting of this motion.

WHEREFORE, Ms. Harun respectfully requests that this Unopposed Motion for Thirty (30) Days to Submit the Joint Status Report be granted, and that the Court exclude the period of the continuance from computation under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(7)(A).

Respectfully submitted this 13th day of February 2023.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Unopposed Motion for Thirty (30) Days to Submit Joint Status Report upon opposing counsel using the CM/ECF system, which will send email notification of such filing to the opposing counsel of record:

Mr. Louis Hamner, Esq.
Assistant United States Attorney
22 Barnard Street, Suite 300
Savannah, Georgia 31401

Respectfully submitted this 13th day of February 2023.

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