

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

UNITED STATES OF AMERICA	:	
	:	: Case No. 3:23-CR-00003
V.	:	
	:	
GLADYS HARUN,	:	
DEFENDANT.	:	
	:	
	:	

**UNOPPOSED MOTION FOR EXTENSION OF TEN DAYS TO REVIEW
PRESENTENCE INVESTIGATION REPORT WITH GLADYS HARUN
AND SUBMIT OBJECTIONS**

COMES NOW, undersigned counsel for Gladys Harun, and hereby request this Honorable Court to grant an extension of ten days to review the Presentence Investigation Report with the Defendant and submit objections. In support thereof, counsel states the following:

(1)

On July 11, 2023 the Court denied counsel's request to withdraw from Defendant's case at Defendant's request.

(2)

Counsel is requesting an additional ten (10) days from the signing of this order to review Presentence Investigation Report with Ms. Harun and determine if there are any objections to the Presentence Investigation Report that are warranted.

(3)

Counsel conferred with opposing counsel, Assistant United States Attorney Alexander Hamner, and United States Probation Officer Shelby Watson and they do not oppose the granting of this motion.

WHEREFORE, Ms. Harun counsel respectfully requests that this Unopposed Motion for Extension of Time to Review Presentence Investigation Report and Submit Objections 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 14th day of July 2023.

Respectfully submitted,

LUWEMBA LAW
2296 Henderson Mill Road, Ste. 304
Atlanta, Georgia 30345
Office: 404-522-1400
Email: luwemba@luwembalaw.net

/s/ Mohammed S. Luwemba
Mohammed S. Luwemba
Georgia Bar No. 680308

TERI THOMPSON, LLC
2330 Scenic Highway
Snellville, Georgia 30078
Office: 770-674-2890
Email: terithompson17@gmail.com

/s/ Teri L. Thompson
Teri L. Thompson
Georgia Bar No. 443999

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the ***UNOPPOSED MOTION FOR EXTENSION OF TIME TO REVIEW PRESENTENCE INVESTIGATION REPORT AND SUBMIT OBJECTIONS*** upon opposing counsel using the CM/ECF system which will send email notification of such filing to the opposing counsel of record:

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

Respectfully submitted this 14th day of July 2023.

Respectfully submitted,

LUWEMBA LAW
2296 Henderson Mill Road, Ste. 304
Atlanta, Georgia 30345
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Email: luwemba@luwembalaw.net

/s/ Mohammed S. Luwemba
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