

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
DUBLIN DIVISION

|                           |   |                    |
|---------------------------|---|--------------------|
| UNITED STATES OF AMERICA, | ] |                    |
|                           | ] |                    |
| v.                        | ] |                    |
|                           | ] | CASE NO. 3:23-CR-3 |
| GLADYS WANJIKU HARUN      | ] |                    |
|                           | ] |                    |

**MOTION TO EXTEND TIME FOR DEFENSE TO SUBMIT  
WRITTEN OBJECTIONS TO PRESENTENCE INVESTIGATION REPORT**

Comes now GLADYS W. HARUN and hereby moves this Honorable Court to extend the time for her to submit written objections to the initial draft of the presentence investigation report (PSR). For the reasons set forth below, Defendant requests that she has through and until November 1, 2023 to submit his objections to the PSR.

1. Counsel was appointed on September 19, 2023 and obtained access to Defendant's PSR on September 20, 2023.
2. Prior counsel filed timely objections to the PSI on July 27, 2023, but current counsel requests to file additional objections.
3. Moreover, this motion is not interposed for the purpose of delay, but instead it is filed to assist counsel in continuing to provide Defendant with a meaningful defense, consistent with counsel's obligations to this Court under the Criminal Justice Act.

Wherefore, Defendant having shown good cause to support the relief requested herein, she respectfully requests that she be granted through and until October 1, 2023, to submit all amended objections Defendant may have to the PSR.

This 20<sup>th</sup> day of September, 2023.

s/ Johnny E.C. Vines

Johnny E.C. Vines

GA Bar No. 940633

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**CERTIFICATE OF SERVICE**

This is to certify that I have on this day served all parties in this case with the attached Motion to Extend Time for Defendant to Submit Written Objections to Presentence Investigation Report in accordance with the directives from the Court Notice of Electronic Filing ("NEF") which was generated as a result of this electronic filing.

This 20<sup>th</sup> day of September, 2023.

s/ Johnny E.C. Vines

Johnny E.C. Vines

GA Bar No. 940633

Attorney for Clarence Johnson

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