

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

UNITED STATES OF AMERICA,

v.

GLADYS WANJIKU HARUN

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CASE NO. 3:23-CR-3

**SECOND 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 October 20, 2023 to submit his objections to the PSR.

1. Counsel was appointed on September 19, 2023 and obtained the Defendant's PSR on September 20, 2023.
2. The Honorable Court granted Defendant's first motion, setting the new date to October 6, 2023.
4. The Defense recently received the discovery and is currently reviewing to better prepare for objections.
5. Counsel for Defendant has municipal judges' training from October 4, 2023 until October 6, 2023.
6. The Government does not oppose the motion.
7. 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 he be granted through and until October 20, 2023 to submit all objections Defendant may have to the PSR.

This 3rd day of October, 2023.

s/ Johnny E.C. Vines

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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 Second 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 3rd day of October, 2023.

s/ Johnny E.C. Vines
Johnny E.C. Vines
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Attorney for Defendant

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