

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

DEC 31 2024

FILED

GLADYS HARUN
PETITIONER

v.

UNITED STATES OF AMERICA
RESPONDENT

Case No: 3:23-CR-00003

PETITIONER'S MOTION FOR EXTENSION OF TIME TO FILE HER MOTION
TO VACATE, SET ASIDE, OR CORRECT SENTENCE, PURSUANT TO 28 U.S.C
2255

Comes now petitioner Gladys Harun in pro se, in necessity,
and hereby moves this honorable court to issue an order granting
a ninety (90) day extension of time to file her motion to vacate,
set aside, or correct sentence pursuant to 28 U.S.C 2255.
Petitioner previously requested the court to appoint counsel for
her; a request that the court denied in June 2024. Petitioner had since
changed her mind and was not going to file a 2255 but this week,
she has become aware that her conviction and sentence was obtained
under a constitutional violation that resulted in the
fundamental miscarriage of Justice and/or incarceration of an actually
innocent defendant. In support, the petitioner shows the court
the following:

1.) Petitioner's A.E.D.P.A(Antiterrorism and Effective
Death Penalty Act of 1996) deadline has not yet been
reached but rapidly approaches.

Petitioner just discovered a constitutional violation in the
criminal process that produced her conviction/sentence and wishes
to file her request for relief, in GOOD FAITH, pursuant to

28 U.S.C. 2255.

Petitioner currently has no other choice but to represent herself pro se, in necessity. Petitioner has no training in law and needs additional time to research her recent discovery.

Petitioner has access to a limited law library as it contains 6 computers to facilitate 650 inmates here at Alderson prison camp. What's more, after waiting her turn, petitioner is limited to ONLY two hours to research and then must wait her turn again.

This motion is made in good faith, in the Interest of Justice, and not meant to delay the proceedings. The United States nor any other adverse party will be prejudiced by a ninety(90) days delay.

Wherefore now, above premises considered, petitioner respectfully MOVES this honorable court to grant her a ninety (90) day extension of time to file her 28 U.S.C 2255 motion.

Done this on 12/20/2024

Respectfully Submitted,

Gladys Harun

FED No: 09407510

DORM: B1

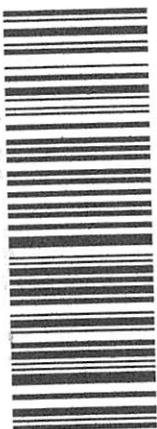
Address: One Glen Ray Rd
Box A,
Alderson WV 24910

Signed----------

pro se petitioner

Shady Hann
Fed no 09407510
B
Alderson prison camp
000 Glen Ray Rd Box A
Alderson WV 24910.

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Augusta, GA 30901
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