

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

FILED
U.S. DISTRICT COURT
S. DIST. OF GA.

2026 MAY 11 A 10:45

GLADYS HARUN

CLERK *AO*
S. DIST. OF GA.

Petitioner

CASE NO. 3:23-cr-00003-DHB-BKE

UNITED STATES OF AMERICA

Respondent

MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO MAGISTRATE
JUDGE'S REPORT AND RECOMMENDATION

TO THE HONORABLE COURT:

Petitioner Gladys Harun, proceeding pro se, respectfully moves this Court for an extension of time pursuant to Federal Rule of Civil Procedure 6(b) and the Court's inherent authority to file objections to Magistrate Judge Brian K. Epps' Report and Recommendation issued on April 30, 2026. Petitioner requests that the Court extend the current deadline of May 18, 2026, by an additional sixty (60) days to July 17, 2026.

In support of this motion, Petitioner states as follows:

1. The Magistrate Judge issued a Report and Recommendation on April 30, 2026, recommending dismissal of Petitioner's 28 U.S.C. § 2255 motion. The Report states that objections must be filed by May 18, 2026.
2. Petitioner respectfully requests additional time to:
 - a. Seek and obtain appointment of counsel to assist in filing proper objections;
 - b. Prepare comprehensive objections addressing the legal and factual findings in the Report and Recommendation; and

c. Ensure meaningful appellate review is preserved.

3. Under Federal Rule of Civil Procedure 6(b)(1)(A), a court may, for “good cause,” extend the time to act when the request is made before the original deadline expires.

Good cause exists in this case because:

- a. The Report and Recommendation addresses a 73-page motion to supplement the record with extensive documentary evidence and a 52-page § 2255 petition raising multiple cognizable claims;
 - b. Petitioner is currently Pro se and lacks the legal training necessary to adequately address the complex legal issues raised in the Report and Recommendation.
 - c. Petitioner need to locate counsel to assist with this matter, given the complexity of the legal issues and the need to properly preserve issues for appellate review;
 - d. The matters at issue involve significant liberty interests and substantial claims concerning Petitioner’s conviction and sentence, warranting careful and thorough consideration; and
 - e. The interests of justice require that Petitioner have meaningful opportunity to obtain counsel and prepare adequate objections.
4. The Eleventh Circuit has recognized that “judicial efficiency and the interests of justice” are served when courts grant reasonable extensions to allow parties to obtain counsel. See *United States v. Lewis*, 991 F.2d 524 (11th Cir. 1993).
5. Granting this extension will not prejudice the Government, as the additional time requested is reasonable and necessary to ensure fair consideration of Petitioner’s claims.

6. Failure to grant this extension may result in the Report and Recommendation becoming the opinion and order of the Court without adequate consideration of Petitioner's objections, potentially affecting her substantial rights.
7. Petitioner respectfully requests that the Court grant this motion and extend the deadline for filing objections to the Magistrate Judge's Report and Recommendation from May 18, 2026, to July 17, 2026.

WHEREFORE, Petitioner respectfully requests that this Court:

1. Grant this Motion for Extension of Time;
2. Extend the deadline for filing objections to the Magistrate Judge's Report and Recommendation to July 17, 2026; and
3. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted this 14 day of May, 2026.

A handwritten signature in black ink, appearing to be "A. J. [unclear]", is written below the submission date.

Gladys Harun, Pro Se

192 Amelia Dr

Byron Ga, 31008

Tel 4785504123

05/05/2026

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Motion for Extension of Time upon the United States Attorney's Office for the Southern District of Georgia by mailing a copy to:

United States Attorney's Office Southern District of Georgia

Assistant United States Attorney

United States Attorney's Office

P.O. Box 8970

Savannah, GA 31412

Gladys Harun





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