

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 21-CR-239-GKF
	)	
ALETA NECOLE THOMAS,	)	
	)	
Defendant.	)	

**MOTION OF DEFENDANT, ALETA NECOLE THOMAS
FOR CONTINUANCE OF SENTENCING HEARING**

The defendant, Aleta Necole Thomas (“Ms. Thomas”), moves this Court for a continuance of her sentencing hearing as more particularly set forth herein.

1. AUSA Kristin Harrington objects to the relief requested in this motion.
2. Sentencing is presently set for June 7, 2022 at 11:00 am. No previous requests for continuance have been requested.
3. The factual reasons for this motion are as follows:
 - The sentencing issues in this case are sharply divided. Ms. Thomas has filed objections to the PSR, each of which the government contests;
 - Numerous supporters of Ms. Thomas have provided information to the undersigned which cannot be easily formatted for the Court by the present sentencing date;
 - The undersigned has received and continues to receive information that is highly relevant to Ms. Thomas’s motion for variance. This information cannot be easily formatted for the Court by the present sentencing date; and
 - A continuance of approximately two weeks will allow the undersigned to provide evidence that is relevant to Ms. Thomas’s PSR objections and to her motion for variance.

WHEREFORE, Ms. Thomas requests that this Court grant a continuance of Ms. Thomas's sentencing hearing for a period of approximately two weeks.

Respectfully submitted,

S/ Keith A. Ward
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Attorney for Aleta Thomas

CERTIFICATE OF SERVICE

I certify that I served all registrants in the above-captioned case by submitting this document to the Clerk of the Court using the ECF System for filing and transmittal.

S/ Keith A. Ward