

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALETA NECOLE THOMAS,

Defendant.

Case No. 21-CR-239-GKF

**Response in Opposition to Defendant's
Motion to Continue Sentencing Hearing**

The Court should deny Aleta Thomas's request for a continuance of her Sentencing Hearing because Ms. Thomas has had ample time to file objections and motions, gather letters from supporters, and present other information to the Court related to her sentencing. More than six months ago, Ms. Thomas entered guilty pleas in this case before the Honorable Judge Billy Roy Wilson. During her change of plea hearing, the Court advised Ms. Thomas of her first sentencing date set May 25, 2022, at 1:15 p.m. before the Honorable Judge Wilson.

In anticipation of this first sentencing hearing date, on May 16, 2022, Ms. Thomas filed an extensive Motion for Sentencing Variance of Defendant, Aleta Necole Thomas, Doc. 97, along with 16 letters of support. Two days later, she filed her Presentence Report Objections of Aleta Necole Thomas. Doc. 98. On May 20, 2022, the Court reset Ms. Thomas's sentencing from May 25 to June 7, 2022.

Ms. Thomas has had ample opportunity to file motions, to gather letters of support, and present information to the Court. Ms. Thomas's request to continue her sentencing hearing does not sufficiently describe or explain how this newly discovered information will aid the Court in determining an appropriate sentence. It is difficult to understand how Ms. Thomas has not yet gathered and provided all the information that is "highly relevant to Ms. Thomas's motion for variance[.]" and "evidence that is related to Ms. Thomas's PSR objections" given Ms. Thomas's extensive filings to date. Doc. 106 p. 1. Moreover, it is unclear why Ms. Thomas needs to format this information to present it to the Court. Finally, in the event the Court grants Ms. Thomas's motion for continuance, the Government requests the Court set deadlines for Ms. Thomas to file her additional filings and for the Government to respond.

Respectfully submitted,

CLINTON J. JOHNSON
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Certificate of Service

I hereby certify that on the day of June 2, 2022, I served the foregoing document via electronic email, on the following:

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