UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v. **Case No. 3:24-cr-179-WWB-LLL**

CRYSTAL DENEAN HARVELL
_____/

UNOPPOSED MOTION FOR EXTENSION OF TIME TO SELF-SURRENDER

Defendant, **Crystal Denean Harvell**, by and through undersigned counsel, hereby moves this Court for a fourteen (14) day extension to self-surrender to the Bureau of Prisons (BOP) and as grounds, states the following:

1. On March 10, 2025, Ms. Harvell came before this Court and was sentenced to 24 months of incarceration. She was given a self-surrender date of 5:00 p.m. on Friday, April 11, 2025 (Doc. 41).

2. Ms. Harvell is prepared to self-surrender. However, as of the filing of this Motion, the Bureau of Prisons has not provided her with a designated facility for her surrender.

3. If the Bureau of Prisons does not provide Ms. Harvell and the U.S. Marshals with a designated facility prior to Friday, April 11, 2025, Ms. Harvell will be required to surrender to the United States Marshals office in Jacksonville, Florida. If Ms. Harvell is required to self-surrender to the United States

Marshal at 5:00 on Friday, April 11, 2025, the Marshals will have to process her, place her in a local jail facility until such time that the Bureau of Prisons provides a designated facility, and will then have to transport her to that facility.

4. This Court is familiar with Ms. Harvell's medical and mental health struggles, which likely will be exacerbated if she is required to move to various facilities by bus or plane prior to being housed at the facility of designation.

5. Ms. Harvell would like to begin her sentence and is not asking for this extension to delay her start date in anyway. The only reason for this request is to ensure that she can self-surrender directly to the designated facility to avoid having to be transported by the U.S. Marshals and the unknowns that exist with this type of surrender.

6. The supervising Pretrial Officer, Kimberly Barrett, indicates that Ms. Harvell has remained complaint while awaiting her self-surrender date. It is undersigned counsel's understanding from Ms. Barrett that the Pretrial Service Office does not take a position on requests to extend a self-surrender date.

7. Assistant United States Attorney Kevin Frein has indicated that he has no objection to the extension request.

8. This Motion is made in good faith and not for the purpose of delay.

WHEREFORE, Ms. Harvell respectfully requests this Court grant a fourteen-day extension to 5:00 p.m. on Friday, April 19th, 2025 for Ms. Harvell to self-surrender to the Bureau of Prisons.

Dated: April 8, 2025

A. FITZGERALD HALL, ESQ.
FEDERAL DEFENDER, MDFL

s/ Sabra M. Barnett
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by electronic notification to the Office of the United States Attorney, 300 N. Hogan St, Suite 700, Jacksonville, Florida 32202, this 8th day of April 2025.

s/ Sabra M. Barnett
Sabra M. Barnett, Esq.
Assistant Federal Defender