

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

UNITED STATES OF AMERICA

v.

REALITY LEIGH WINNER

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NO. 1:17-CR-00034

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MOTION FOR COMPASSIONATE RELEASE PURSUANT TO 18 U.S.C. § 3582 AND
REQUEST FOR ORAL ARGUMENT

Defendant Reality Leigh Winner (“Reality” or the “Defendant”) files this Motion for Compassionate Relief Pursuant to 18 U.S.C. § 3582 and Request for Oral Argument and respectfully asks this Court for an order releasing her based on the “extraordinary and compelling reasons” pursuant to the recently amended 18 U.S.C. § 3582(c)(1)(A)(i). Due to the exigent nature of this Motion and the various observations and limitations explained by this Honorable Court in its recent Standing Orders (MC 120-4 and MC 120-5) issued by Chief Judge Randall Hall, Reality also respectfully requests video or telephonic oral argument on this motion as soon as possible after a reasonable opportunity for the United States of America to be heard. Counsel for Defendant conferred with DOJ prior to the filing of this motion. DOJ stated they would take a position on the motion after reviewing it and seeking other information. Defendant has filed a supporting brief contemporaneously with this motion.

Respectfully submitted,

BY: /s/ Joe D. Whitley
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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2020, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record for all parties.

/s/ Joe D. Whitley
Joe D. Whitley