

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

UNITED STATES OF AMERICA

*
*
*
*
*
*
*
*

v.

NO. 1:17-CR-00034

REALITY LEIGH WINNER

* * * * *

DEFENDANT’S MOTION FOR EXPEDITED BRIEFING AND IMMEDIATE HEARING

Reality Leigh Winner (“Reality” or “Defendant”) respectfully moves this Court to waive the time requirements otherwise set forth by Local Rule 7 and respectfully requests expedited briefing and an immediate hearing as contemplated by Local Rule 7.7 based on the “extraordinary and compelling reasons” discussed in her accompanying *Motion for Compassionate Relief Pursuant to 18 U.S.C. § 3582 and Request for Oral Argument* and brief in support thereof [ECF No. 341, 341-1] (the “Motion”) and the exigent nature of her Motion, as explained therein and as acknowledged by this Honorable Court’s Standing Orders (MC 120-4 and MC 120-5) issued by Chief Judge Randall Hall. As set forth in her Motion, the current global pandemic wrought by COVID-19, heightened as a result of Reality’s incarceration in a densely-populated environment with an inmate population already tainted with his deadly and highly-contagious disease, requires this Court’s immediate intervention. As a result of those circumstances, coupled with Reality’s underlying medical conditions, she respectfully submits that the timelines for usual motion practice will not suffice under the exigent circumstances present here and, indeed, may expose her to unnecessary risk of harm that she seeks to prevent by the filing of her Motion. Counsel is and will remain available to participate in video or telephonic oral argument on this Motion after a

reasonable opportunity for the United States of America to be heard or such other procedure the Court may deem appropriate.

Respectfully submitted,

BY: /s/ Joe D. Whitley
Joe D. Whitley (Bar No. 756150)
Admitted *Pro Hac Vice*
Brett A. Switzer (Bar No. 554141)
**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**
3414 Peachtree Rd., NE Suite 1600
Atlanta, GA 30326
(404) 577-6000
JWhitley@bakerdonelson.com
BSwitzer@bakerdonelson.com

Matthew S. Chester (La. Bar No. 36411)
Admitted *Pro Hac Vice*
**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**
201 St. Charles Ave., Suite 3600
New Orleans, LA 70170
(504) 566-5200
MChester@bakerdonelson.com

Thomas H. Barnard (Az. Bar No. 020982)
Admitted *Pro Hac Vice*
**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**
100 Light Street.
Baltimore, MD 21202
(410) 685-1120
TBarnard@bakerdonelson.com

**ATTORNEYS FOR DEFENDANT
REALITY LEIGH WINNER**

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