IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	§
v.	\$ \$ \$
CHRISTOPHER RAY GRIDER,	\$ \$
Defendant	8 §

Case No. 21-CR-00022-KBJ

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

TO THE HONORABLE KETANJI BROWN JACKSON, UNITED STATES DIS-TRICT COURT JUDGE FOR THE DISTRICT OF COLUMBIA:

COMES NOW CHRISTOPHER RAY GRIDER, the Defendant in the above styled and numbered cause, by and through undersigned counsel, and moves this Court to modify his conditions of release, specifically, to remove the condition requiring location monitoring with a GPS ankle monitor. Although Mr. Grider's supervision officer in the Western District of Texas is recommending that condition be removed, the Government is opposing this motion. In support thereof, he would show the following.

 This Court released Mr. Grider on conditions of release on February 22, 2021. (Doc. Nos. 14 & 15). Among other conditions, this Court ordered Mr. Grider to participate in a location restriction/monitoring program with a GPS leg monitor and a curfew of 10:00 pm to 6:00 am. (Doc. No. 14). Since his release, he has been supervised by Kit Myers, Senior U.S. Pretrial Services Officer and Intensive Supervision Specialist for the Western District of Texas, Waco Division.

- 2. Ms. Myers conferred with undersigned counsel and affirmed that Mr. Grider has been compliant with all conditions of his release with no issues since his release. She further requested that the condition requiring location restriction/monitoring program with a GPS leg monitor and a curfew of 10:00 pm to 6:00 am be removed and conveyed that desire to the Pretrial Services office for this District.
- 3. With Mr. Grider's children about to go on their summer break from school, Mr. Grider wishes to have more flexibility in being able to take his children on trips away from his residence within his permitted districts of travel (Western and Southern Districts of Texas). Given his compliance with his conditions of release and favorable recommendation from his supervising officer, he is requesting that this Court remove the condition requiring location restriction/monitoring program with a GPS leg monitor and a curfew of 10:00 pm to 6:00 am
- 4. Undersigned counsel has conferred with counsel for the Government and confirmed that the Government is opposed to this motion.

WHEREFORE, PREMISES CONSIDERED, Mr. Grider respectfully requests this Honorable Court modify his conditions of release to remove the condition requiring location restriction/monitoring program with a GPS leg monitor and a curfew of 10:00 pm to 6:00 am.

Date: May 4, 2021

Respectfully Submitted,

MAYR LAW, P.C.

by: <u>/s/ T. Brent Mayr</u> T. BRENT MAYR Texas State Bar Number 24037052 D.C.D.C. Bar ID TX0206

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ATTORNEY FOR THE DEFENDANT, CHRISTOPHER RAY GRIDER

CERTIFICATE OF CONFERENCE

I certify that I conferred with Counsel for the Government, Candice Wong, on May 4, 2021, and she affirmed that she is opposed to this motion. I further certify that I conferred with Mr. Grider's pretrial supervision officer and her position is true and correct as set out in this motion.

> <u>/s/ T. Brent Mayr</u> T. BRENT MAYR

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government, Candice Wong, on May 4, 2021, via CM/ECF and email.

<u>/s/ T. Brent Mayr</u> T. BRENT MAYR

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ORDER ON

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

On this day came to be heard the Defendant's Motion to Modify Conditions of Release requesting that this Court remove the condition requiring location restriction/monitoring program with a GPS leg monitor and a curfew of 10:00 pm to 6:00 am. After considering the same, this Court hereby ORDERS that the motion be

_____ GRANTED. The Defendant is no longer required to submit to a location restriction/monitoring program with a GPS leg monitor and a curfew of 10:00 pm to 6:00 am.

DENIED.

SIGNED AND ENTERED ON ______.

HON. KETANJI BROWN JACKSON UNITED STATES DISTRICT JUDGE