

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal Action No. 21-22 (CKK)

CHRISTOPHER RAY GRIDER.

Defendant.

DEFENDANT'S UNOPPOSED MOTION TO TRAVEL

TO THE HONORABLE COLLEEN KOLLAR-KOTELLY, UNITED STATES DISTRICT COURT JUDGE FOR THE DISTRICT OF COLUMBIA:

CHRISTOPHER RAY GRIDER, the Defendant in the above styled and numbered cause, by and through undersigned counsel, moves this Court to, as an exception to his conditions of release, permit him to travel as requested below.

1. Prior to transfer to this Court, Judge Ketanji Brown Jackson ordered the release of Mr. Grider on conditions of release on February 22, 2021. (Doc. Nos. 14 & 15). Among other conditions, she 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 fully complied with that condition.
2. Judge Jackson further restricted Mr. Grider's travel within the Western District of Texas where he resides and the Southern District of Texas where undersigned counsel has his primary place of practice. (Doc. 14).
3. On October 26, 2021, Mr. Grider requested permission to travel to Dallas, Texas

on November 2 to November 3 to assist his wife who was undergoing surgery there; this Court granted that request. (Docs. 59, 60).

4. Mr. Grider needs to return to Dallas with his wife for an additional surgery on Monday, February 28, 2022 and is seeking permission for that travel outside the Western District of Texas. He would leave on Sunday, February 27, 2022, travel to Dallas to spend the night prior to the day of the surgery, and then return home with her the following day. As with previous requests to travel, Mr. Grider would take his location monitoring equipment with him to monitor his movement while on this trip and provide the details of his travel to his supervision officer.
5. Undersigned counsel conferred with the attorney for the Government, Candice Wong, and she is not opposed to this motion.

WHEREFORE, PREMISES CONSIDERED, Mr. Grider respectfully requests this Honorable Court permit him to travel as set out in this motion.

Date: February 24, 2022

Respectfully Submitted,

MAYR LAW, P.C.

by: /s/ T. Brent Mayr

T. BRENT MAYR

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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, and she is not opposed to this motion.

/s/ T. Brent Mayr
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 February 24, 2022, via CM/ECF and email.

/s/ T. Brent Mayr
T. BRENT MAYR