

to come to this court. As previously stated, the court is aware of his physical limitations and the extreme difficulty of him being required to travel by air.

We ask this court to conduct a motion hearing by Zoom to address this matter. We further request that when Mr. Block describes his physical infirmities that portion of the proceeding be conducted under seal in order to preserve his privacy.

Respectfully submitted,

/signed by/

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Counsel for the Defendant

Certificate of Service

I hereby certify that on the 7th day of January, 2023, I filed the foregoing motion with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following CM/ECF user(s):

AUSA Erik Kenerson

Via email to Erik Kenerson@usdoj.gov

/signed by/

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