UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

:

Plaintiff,

Case No.: 21-287-2 (TNM)

HUNTER SEEFRIED,

v.

.

Defendant,

DEFENDANT'S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL TO NORTH CAROLINA

Defendant, Hunter Seefried, through undersigned counsel, respectfully moves for permission to travel outside of the District of Delaware for a short vacation. Specifically, Mr. Seefried seeks to travel to Salvo, North Carolina on May 15, 2021 and to return to his residence in Delaware on May 22, 2021.

In support of the motion, counsel states:

- 1. Mr. Seefried is before the Court charged in a five-count indictment relating to the events on the United States Capitol grounds on January 6, 2021. Mr. Seefried appeared before the Court for arraignment on the indictment and a status conference on Tuesday, May 4, 2021.
- 2. By concurrence of the government and the defense, the Court scheduled another status conference for July 2, 2021.
- 3. On January 13, 2021, Magistrate Judge Robin M. Meriweather issued a warrant for Mr. Seefried's arrest pursuant to a criminal complaint based on the events later charged in the indictment. On January 14, 2021, 2021, Mr. Seefried was arrested and presented in the United States District Court for the District of Delaware for a Rule 5(c)(3) hearing. Mr.

Seefried waived his identity hearing, and the government did not seek his pretrial detention. From January 14, 2021, Mr. Seefried was supervised by that Court's Pretrial Service Agency without incident.

- 4. On January 25, 2021, Mr. Seefried appeared before Magistrate Judge Faruqui for his initial appearance in the District. During the hearing, Mr. Seefried waived his preliminary hearing and moved to exclude time under the Speedy Trial Act. The Court continued Mr. Seefried on his personal recognizance without objection from the government. Consistent with his compliance before the District Court for Delaware, Mr. Seefried is in full compliance with all the conditions of release ordered by Magistrate Judge Faruqui.
- 5. Mr. Seefried would like to travel with his family by car to Salvo, North Carolina on May 15, 2021 and to return to Delaware on May 22, 2021. The prepaid family trip to North Carolina was originally scheduled for May 2020 but was cancelled in response to the pandemic.
- 6. Assistant United States Attorney Brittany Reed has informed undersigned counsel that she does not oppose Mr. Seefried's permission for travel. His Pretrial Service Officer Da'Shanta Valentine-Lewis, has similarly informed that she does not object to Mr. Seefried's request to travel.

WHEREFORE, undersigned counsel respectfully moves the Court to permit Defendant, Hunter Seefried, to travel to Salvo, North Carolina on May 15, 2021 and to return

to his home in Delaware on May 22, 2021.

Respectfully submitted,

/s/ Edson A. Bostic Edson A. Bostic, Esquire The Bostic Law Firm 1700 Market Street, Suite 1015 Philadelphia, PA 19104 (267) 239-4693 eab.bosticfirm@gmail.com

Attorney for Hunter Seefried

Dated: May 5, 2021

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	
V.	:	Case No.: 21-287-2 (TNM)
HUNTER SEEFRIED,	: :	
Defendant,	•	
<u>ORDER</u>		
AND NOW this	day of	2021, IT IS HEREBY
ORDERED that the Unopposed M	lotion for Pe	rmission to Travel to North Carolina is
GRANTED. Mr. Seefried is perm	itted to trave	el to Salvo, North Carolina on May 15, 2021 and
to return to his residence in Delaw	are on May	22, 2021.
		HONORABLE TREVOR N. McFADDEN

United States District Court Judge