

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

KATHERINE STAVELEY SCHWAB

Defendant.

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: Case No. 1:21-mj-179
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DEFENDANT’S UNOPPOSED MOTION TO MODIFY BOND CONDITIONS

COMES NOW the defendant, Katherine Staveley Schwab, by and through counsel, Reed Prospere and Jeffrey Zimmerman, and files this unopposed to motion to modify bond release conditions and for cause would show:

- 1. Ms. Schwab, who lives in Texas, was arrested and released in this matter by the United States District Court for the Northern District of Texas (Forth Worth Division), on February 1, 2021. See Order Setting Condition of Release, 4:21-mj-68 (Doc. 5) (N.D. Tex. 2/1/21).
2. One of her release conditions is that she have no contact “with anyone involved in any way with the US Capitol protest held on January 6, 2021.” Id. at 7(g). This would include another individual charged in this matter, Mr. Jason Hyland.
3. Ms. Schwab respectfully requests that her conditions of release be modified to allow her to be in contact and communicate with Mr. Hyland in as much as they were living together at the time of the bond hearing. The government’s case against each of them would not be negatively impacted by modifying this condition as requested.

4. The United States, via Assistant United States Attorney Kimberly Paschall, with the U.S. Attorney's office in Washington, D.C., has been consulted and does not object to the requested modification of this condition.

WHEREFORE, PREMISES CONSIDERED, the Defendant requests that this unopposed motion for modification be granted.

Respectfully Submitted,

KATHERINE STAVELEY SCHWAB  
By Counsel

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ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of February 2021, a true and accurate copy of the foregoing was served on Kimberly L. Paschal, Assistant United States Attorney, 555 4th Street NW, Washington, DC 20530 via email: [Kimberly.Paschall@usdoj.gov](mailto:Kimberly.Paschall@usdoj.gov).

\_\_\_\_\_/s/\_\_\_\_\_  
JEFFREY D. ZIMMERMAN

