

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

<b>UNITED STATES OF AMERICA</b>	)	
	)	<b>Criminal No. 21-204-01 (BAH)</b>
<b>v.</b>	)	<b>Chief Judge Howell</b>
	)	<b>Status: May 14, 2021</b>
<b>MATTHEW BLEDSOE</b>	)	

**MOTION TO TEMPORARILY MODIFY TRAVEL RESTRICTION  
TO PERMIT SPECIAL WORK TRAVEL  
AND POINTS AND AUTHORITY IN SUPPORT THEREOF**

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully moves this Honorable Court to temporarily modify his travel restriction in this case to permit him to travel for work purposes to: 1) Willard, Missouri on May 6, 2021, 2) Frisco, Texas on June 9 and June 10, 2021, and 3) Naples, Florida for three days at the end of May 2021. In support of this motion, Mr. Bledsoe would show:

1. As has been discussed at earlier hearings and verified by the Pretrial Services Agency (PSA), Mr. Bledsoe owns a moving company in Memphis, Tennessee. Most of Mr. Bledsoe's business is for moves that occur within the Memphis area. However, on occasion, Mr. Bledsoe does do moves that are outside the area.

2. Currently, as a condition of his release in this case, Mr. Bledsoe is only permitted to travel within a 150-mile radius of Memphis, Tennessee without prior approval from the Court. Mr. Bledsoe is also on GPS location monitoring.

3. Mr. Bledsoe currently has three jobs scheduled for moves that are outside of a 150-mile radius of Memphis, Tennessee in the next seven weeks. These three jobs are as follows:

- a. May 6. Mr. Bledsoe will be moving a household from the Memphis area to Willard, Missouri (near Springfield, Missouri). He plans to leave the Memphis area early in the morning on May 6, complete the move, and return to Memphis area late in the evening that same day.
- b. June 9-June 10. Mr. Bledsoe will be moving a household from the Memphis area to Frisco, Texas (near Dallas). He plans to leave the Memphis area early in the morning on June 9. He will complete the move on June 9 and June 10. He will spend the night of June 9 in the Frisco area. He will return to the Memphis area late in the evening of June 10.
- c. End of May. Mr. Bledsoe will be moving a household from the Memphis area to Naples, Florida. The exact dates of the move have not been finalized. Given the distance of the move, completing the move, including travel time, will take three days and entail spending two nights away from home. Mr. Bledsoe will notify PSA of the exact three days he will be out of the Memphis area for this move prior to any travel.

4. On April 26, 2021, undersigned counsel sent an e-mail to Assistant United States Attorney Jamie Carter seeking the government's position on this motion. The e-mail explained the substance and details of the motion and had a draft of the motion attached. As of the filing of this motion, counsel has not heard back from Ms. Carter regarding the government's position on the motion.

5. Conditions of release can be modified by a judicial officer at any time. 18 U.S.C. § 3142(c)(3).

WHEREFORE, the defendant, Matthew Bledsoe, moves this Honorable Court to temporarily modify his travel restriction in this case to permit him to travel for work purposes to:

1) Willard, Missouri on May 6, 2021, 2) Frisco, Texas on June 9 and June 10, 2021, and 3) Naples, Florida for three days at the end of May 2021.

Respectfully submitted,

/s/

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	(	<b>Status: May 14, 2021</b>
<b>MATTHEW BLEDSOE</b>	)	

**ORDER**

The Court having considered defendant Matthew Bledsoe's Motion to Temporarily Modify Travel Restriction to Permit Special Work Travel and Points and Authority in Support Thereof, it is, this \_\_\_\_ day of \_\_\_\_\_ 2021 hereby

**ORDERED** that the motion is granted, and it is further

**ORDERED** that Mr. Bledsoe may travel to: 1) Willard, Missouri on May 6, 2021; 2) Frisco, Texas on June 9 and June 10, 2021; and 3) Naples, Florida for three days at the end of May 2021, provided Mr. Bledsoe gives the Pretrial Services Agency notice of the exact three days he will be going to/from Naples in advance of the trip.

**SO ORDERED.**

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Beryl A. Howell  
Chief Judge