

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : No. 21-CR-383  
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 PATRICK STEDMAN :  
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**MOTION FOR PERMISSION TO TRAVEL**

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Defendant Patrick Stedman, by and through his counsel Rocco C. Cipparone Jr., Esq., hereby moves the Court for permission for Mr. Stedman to travel as indicated below, with his spouse, for the purpose of participating as members of a wedding party which arrangements were made prior to the Court modifying the terms and conditions of the travel requirements of Mr. Stedman's bail.

In support of the motion the defense states:

**1.** Mr. Stedman has been fully compliant with the terms of his pretrial release to date.

2. On October 21, 2022, the Court entered an Oral Order modifying Mr. Stedman's conditions of release regarding travel such that he is restricted to the District of New Jersey where he lives, and that travel outside the District of New Jersey must be approved by the Court.

3. Mr. Stedman and his wife have had and made plans to attend and participate in the wedding of longstanding and close friends in Texas, when his conditions of bail did not preclude such. Ms. Stedman is a groomsman, and Mrs. Stedman is a bridesmaid. They accepted the invitation to be such prior to the change in Mr. Stedman's travel conditions.

4. Attached as **Exhibit 1** is a copy of the Save the Date card. **Exhibit 2** is a copy of the wedding invitation. Attached as **Exhibit 3** is a letter from the bride and groom to Your Honor indicated their request of course that Mr. Stedman be permitted to attend, and explaining the background of their relationship.

5. Mr. Stedman and his wife have prepaid, again before there was a further travel condition, for their Airbnb rooms. Mr. Stedman's parents also will be traveling with them to attend the wedding, and to assist with child-care while Mr. and Mrs. Stedman carry out their bridal-party duties. A copy of the check for the accommodations deposit (account identifiers redacted) is attached as **Exhibit 4**, along with information regarding the block of rooms. Mr. Stedman also is committed to the balance after the deposit.

6. The wedding will take place just north of Ft. Worth, TX, and Mr. Stedman, his wife along with their children (his second child will be born in the next two weeks), and Mr. Stedman's parents, were planning to drive as a cost-saving measure compared to the substantial cost of flights. Also, the wedding is in a somewhat rural area and they will need a car to go to and from the venue. See **Exhibit 5** (letter from Mr. Stedman to the Court).

7. The wedding itself will be on December 30, 2022, but as usual there are wedding events leading up to it beginning December 29, 2022, and through New Year's Eve as referenced in the letter from the bride and groom (**Exhibit 3**).

8. It therefore respectfully is requested that Mr. Stedman be permitted to travel to Texas from 12/27/22 - 1/3/23. A proposed form of Order is submitted as well.

9. The government (through AUSA Brian Morgan) has advised that it takes no position regarding this request.

Respectfully submitted,

Law Offices of Rocco C. Cipparone, Jr.

BY: /s/Rocco C. Cipparone Jr.

Rocco C. Cipparone, Jr., Esquire  
Attorney for defendant

Dated: November 15, 2022