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

10 UNITED STATE OF AMERICA,

11 Plaintiff,

12 vs.

13 RONALD MELE,

14 Defendant

Case No.: 1:21-cr-00392 -RCL-6

**DEFENDANT MELE’S MOTION TO BE
EXCUSED FROM ATTENDING PRE-
TRIAL HEARINGS IN PERSON IN
WASHINGTON DC AND FOR
PERMISSION TO APPEAR BY ZOOM**

15 **DEFENDANT MELE’S MOTION TO BE EXCUSED FROM ATTENDING PRE-TRIAL**
16 **HEARINGS IN PERSON IN WASHINGTON DC AND FOR PERMISSION TO APPEAR**
17 **BY ZOOM**

18
19 TO THE HONORABLE ROYCE LAMBERTH, U.S. DISTRICT JUDGE FOR THE
20 DISTRICT OF COLUMBIA:

21 Mr. Ronald Mele, through his attorney, Steven C. Bailey, respectfully requests that this
22 Honorable Court excuse defendant from attending the pre-trial hearings currently scheduled for
23 July 20, 2023, in the District Court in Washington DC. In support of the motion, Mr. Mele shows
24 as follows:
25

- 26 1. Defendant has appeared as required by this Court by Zoom in all other
27 appearances.
28 2. Defendant has appeared as and when requested by his pre-trial services officer

1 and has complied with all requirements of pretrial release.

2 3. Mr. Mele has exhausted the funds he has allocated and saved for this case.
3 Moreover, he has recently filed a motion to have counsel appointed.

4 4. Trial is currently set for 10 day beginning October 12, 2023 and defendant needs
5 to save funds to pay for the extraordinary cost associated with being present for trial in October.

6 5. Defendant is represented in this case by Steven C. Bailey and his counsel will be
7 present in court to represent defendants' interests during hearings on trial scheduling, jury
8 questionnaire and pre-trial and in-limine motions.

9 6. Defendant Mele will be present by Zoom if the grants permission and will
10 maintain contact with his attorney both before and during the hearing by telephone.

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14 Respectfully submitted,

15 Dated: June 29, 2023

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18 By: /s/ Steven C. Bailey

19 Steven C. Bailey
20 Attorney for the Defendant
21 RONALD MELE

22 **CERTIFICATE OF SERVICE**

23 I, Steven C. Bailey, hereby certify that on June 29, 2023, I caused a copy of this Motion
24 to be Excused from attending Pre-Trial Motion Hearing in Person in Washington DC and for
25 Permission to Appear by Zoom to be delivered to the parties of record by filing it electronically.

26
27 /s/ Steven C. Bailey

28 Steven C. Bailey