

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

UNITED STATES OF AMERICA

*

v.

* **Criminal No. RDM-21-257**

RONNIE LEE PRESSLEY

*

* * * * *

**DEFENDANT'S EMERGENCY MOTION TO MODIFY
CONDITIONS OF RELEASE**

COMES NOW the defendant, Ronnie Presley, through counsel, Alfred Guillaume III, Esq., who hereby moves this Court to modify conditions of release. In support thereof, he states as follows:

1. Mr. Presley is currently incarcerated at the Northern Neck Regional Jail in Warsaw, Virginia.
2. On January 6, 2022, Mr. Presley informed undersigned counsel that he received news that his sixteen-year-old nephew, Caleb Pressley, unexpectedly passed away.
3. Mr. Johnson requests permission to attend the funeral in Sumner County, Tennessee.
4. Assistant United States Attorney Michael Liebman objects to any modification of the defendant's conditions of release.
5. Mr. Presley has indicated through counsel that he gives his word that he will immediately return to custody if he is allowed to attend the funeral.

WHEREFORE, for the foregoing reasons, the defendant respectfully requests that the court convene an emergency hearing so that he and undersigned counsel can provide the court more details about the funeral and the defendant's request to attend the funeral in Sumner County, Tennessee.

Respectfully submitted,

Alfred Guillaume

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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2022, a copy of Defendant's Motion, was electronically filed in this case to all parties of record.

Alfred Guillaume

Alfred Guillaume III, #MD0085

Attorney for Ronnie Lee Presley