

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

UNITED STATES

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v.

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Case No. 21-cr-00160-TJK

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RYAN ASHLOCK

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**UNOPPOSED MOTION TO TEMPORARILY MODIFY
CONDITIONS OF RELEASE**

COMES NOW the Defendant, Ryan Ashlock, by and through his attorneys, Michael E. Lawlor, and Brennan, McKenna & Lawlor, Chtd., and respectfully requests that this Honorable Court temporarily modify the conditions of release in this case. In support of this motion, counsel states the following.

1. Mr. Ashlock made his initial appearance before this Court and was released on pre-trial conditions on February 26, 2021. Specifically, this Court ordered that Mr. Ashlock be placed on personal recognizance with home detention and location monitoring.

2. Since that time, Mr. Ashlock has complied with all conditions of his pre-trial release.

3. At this time, Mr. Ashlock respectfully asks this Court to temporarily modify his conditions of release such that he be permitted to leave his home for the upcoming Thanksgiving Holiday. Specifically, Mr. Ashlock asks that this Court

permit him to be released from home detention and electronic monitoring, for the period of Wednesday, November 24, 2021 through Sunday, November 28, 2021.

4. Undersigned counsel contacted Assistant United States Attorney Christopher Veatch about the instant request. At this time undersigned counsel is authorized to state that the United States consents to this request.

5. Additionally, undersigned counsel contacted Officer Diana Kerns from Pretrial Services seeking her position on this motion. Undersigned counsel has not heard back from Officer Kerns at this time. Should counsel receive a response from Officer Kerns, the undersigned will file a supplement to this motion.

6. For these reasons, Mr. Ashlock respectfully asks this Court to temporarily modify his conditions of release such that he be permitted leave his home as detailed above.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, November 23, 2021, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Columbia.

/s/

Michael E. Lawlor