

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

UNITED STATES OF AMERICA,

v.

PAUL C. RAE,

Defendant.

Criminal No. 21-cr-378

**DEFENDANT'S SUPPLEMENTAL FILING
REGARDING RAE'S MOTION TO
TRAVEL AND MODIFY CONDITIONS**

NOW comes Defendant, Paul C. Rae, by and through his counsel of record, John M. Pierce, Esq., with this supplement to Mr. Rae's motion regarding attendance at Mr. Rae's friend's wedding.

Mr. Rae and counsel have been corresponding via email with counsel for the United States. The United States indicated they oppose Mr. Rae's attendance at the Las Vegas wedding. In response, Mr. Rae proposes a downsized attendance at the wedding, with four days instead of seven days. Instead of attending from October 13, 2022, through October 19, 2022, Mr. Rae proposes to fly out on Thursday, October 13, attend tuxedo fittings and other preparatory events on Friday, October 14th, attend the wedding rehearsal on Friday October 15th, and the ceremony on Sunday the 16th. Mr. Rae would return by air to Florida on Monday, October 17th.

As of this morning, we have not heard any response from the United States regarding our counterproposal.

CONCLUSION

Wherefore, Mr. Rae respectfully requests this honorable Court to grant his counterproposal, entailing attendance at the wedding of four nights rather than seven nights, from Thursday, October 13, through Monday morning, October 17th

Date: September 28, 2022

Respectfully Submitted,



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Attorney for Defendant

CERTIFICATE OF SERVICE

I, John M. Pierce, hereby certify that on this day, September 28, 2022, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce

John M. Pierce