

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

_____	)	
UNITED STATES,	)	
	)	
v.	)	Crim. No. 21cr268
	)	Hon. Carl J. Nichols
JEFFREY McKELLOP,	)	
Defendant.	)	
_____	)	

**EMERGENCY MOTION FOR IMMEDIATE HOSPITALIZATION AND PRE-TRIAL  
RELEASE**

Comes now Defendant Jeffrey McKellop, by counsel, and moves the Court to order the immediate hospitalization of Defendant for treatment of a dangerous oral abscess – following which he should be released from pre trial confinement on conditions suitable to the Court.

Defendant has for several weeks suffered a very debilitating tooth ache and has requested orally and in writing that the staff of the Central Treatment Facility (“CTF”) afford him adequate medical care. His repeated requests have been dismissed or minimized, and he received no meaningful medical care with the predictable result that his condition worsened. Finally, he was issued antibiotics yesterday. Nonetheless, his condition has apparently continued to decline. As per a pod mate as reported to his counsel, Defendant’s pain has gone from severe to agonizing, and his jaw is grossly distended. Undersign fears an abscess and sepsis with potentially grave consequences.

Defendant needs to be transferred forthwith to a hospital to preclude further deterioration of his condition.

Once his condition has stabilized, the court should consider appropriate conditions for his release for the reasons previously propounded to the court and because CTF has definitively demonstrated its inability (or unwillingness) to care for the welfare of defendant.

Respectfully submitted,

JEFFREY McKELLOP  
By Counsel

/s/  
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Certificate of Electronic Service

I hereby certify that on August 3, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System with consequent service on all parties

/s/  
John C. Kiyonaga