

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

United States of America,

v.

Jessica Watkins,

Defendant.

Case No. 21-cr-028 (APM)

**UNOPPOSED MOTION TO HOLD MOTION FOR RECONSIDERATION OF
DETENTION ORDER IN ABEYANCE PENDING ADDITIONAL DISCOVERY AND TO
VACATE HEARING**

Jessica Watkins, through counsel, respectfully requests that the Court hold her pending motion for reconsideration in abeyance while the record is more fully developed. The government has started the process of producing discovery and of disclosing exculpatory evidence; however, much has yet to be produced. While she continues to maintain her release would not pose a substantial risk to the community, Ms. Watkins wants to ensure that when the Court ultimately reviews its bond decision, she is able to present a more complete picture that places her actions into the proper context, and allows the Court the opportunity to properly consider where she falls on the spectrum of people who have been held versus people who have been released. This is not possible given the current state of the discovery production. Ms. Watkins asks that the hearing scheduled for Monday be vacated until as she renews her motion. The government does not oppose this request.

Respectfully submitted,
A.J. KRAMER
Federal Public Defender

_____/s/_____
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