

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

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UNITED STATES OF AMERICA,

– against –

Docket No. 21-CR-00222 (TFH)

JULIAN ELIE KHATER,

Defendant.

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**UNOPPOSED MOTION TO WAIVE DEFENDANT JULIAN
KHATER’S APPEARANCE AT THE SEPTEMBER 27, 2023
RESTITUTION HEARING**

Defendant Julian Elie Khater, through his counsel, Tacopina Seigel & DeOreo, respectfully submits this motion to request, with the consent of the Government, that Mr. Khater’s appearance be waived at his upcoming restitution hearing, presently scheduled for September 27, 2023.

Notably, the instant request is made for the following two reasons: first, we understand from conferring with the Government that there will likely be no significant dispute, if any, at the hearing with respect to restitution. Second, we have been informed that the Bureau of Prisons (“BOP”) is delaying Mr. Khater’s transfer to his designated facility, and thus entry into an available BOP program, due to his present obligation to attend the hearing.

As referenced above, defense counsel has conferred with Assistant United States Attorneys Anthony Scarpelli and Gilead Light, who consent to this application on behalf of the Government.

WHEREFORE, Mr. Khater, with the consent of the Government, respectfully requests that his appearance at the September 27, 2023 restitution hearing be waived.

Dated this 31st day of August, 2023.

/s/ Chad Seigel
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CERTIFICATION OF SERVICE

I hereby certify that on August 31, 2023, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia, which will send notification of such filing to the following CM/ECF user:

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