IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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V.

Criminal Action No. 21-46 (RDM)

BRADY KNOWLTON,

Defendant.

DEFENDANT'S UNOPPOSED, AMENDED MOTION TO TRAVEL

TO THE HONORABLE RANDOLPH D. MOSS, UNITED STATES DISTRICT JUDGE FOR THE DISTRICT OF COLUMBIA:

BRADY KNOWLTON, the Defendant in the above-styled and numbered cause, by and through undersigned counsel, requests this Court extend the permitted travel approved by the Court's Minute Order of December 27, 2022. In support thereof, he would show the following.

- On December 26, 2022, Mr. Knowlton moved this Court, without opposition from the Government, to permit him to travel to Mexico for business-related purposes.
 ECF Dkt. <u>121</u>. More specifically, he sought permission to travel to Puerto Aventuras, Mexico from January 6 to January 12, 2023.
- 2. On December 27, 2022, this Court granted the motion by Minute Order and authorized the release of Mr. Knowlton's passport for the limited purpose of his travel and further ordered Mr. Knowlton to return his passport to Pretrial Services within 72 hours of his arrival back in the United States.

- After this Court granted Mr. Knowlton's motion, Mr. Knowlton learned that he would need to remain in Mexico until January 14, 2023.
- 4. Mr. Knowlton, by and through undersigned counsel, conferred with both counsel for the Government, as well as his supervision officer in the District of Utah, and neither are opposed to extending Mr. Knowlton's travel until January 14, 2023.

WHEREFORE, PREMISES CONSIDERED, Mr. Knowlton respectfully requests this Court permit him to extend his previously approved travel to Mexico until January 14, 2023.

Respectfully submitted,

RONALD SULLIVAN LAW, PLLC

by: /s/ Ronald S. Sullivan Jr.
RONALD S. SULLIVAN JR.
D.C.D.C. Bar ID 451518
rsullivan@ronaldsullivanlaw.com

1300 I Street NW Suite 400 E Washington, DC 2005 Telephone: (202) 935-4347 Fax: (617) 496-2277

MAYR LAW, P.C.

by: /s/ T. Brent Mayr
T. BRENT MAYR
D.C.D.C. Bar ID TX0206
bmayr@mayr-law.com

5300 Memorial Dr., Suite 750 Houston, TX 77007 Telephone: 713-808-9613

Fax: 713-808-9613

WAGNER PLLC

by: <u>/s/ Camille Wagner</u>
CAMILLE WAGNER
DC Bar No. 1695930
law@myattorneywagner.com

1629 K Street NW, Suite 300 Washington, DC 20006 (202) 630-8812

ATTORNEYS FOR THE DEFENDANT, BRADY KNOWLTON

CERTIFICATE OF CONFERENCE

I certify that I conferred with James Peterson, attorney for the Government, and he does not object to this motion. I further certify that Mr. Knowlton's supervision officer, Devin Dalton, was informed of the proposed modification and he does not oppose it either.

/s/ T. Brent Mayr Brent Mayr Attorney for Brady Knowlton

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government on January 9, 2023, via CM/ECF and by email to Devin Dalton, Pretrial Services Officer for the District of Utah assigned to supervise Mr. Knowlton on the same date.

/s/ T. Brent Mayr
Brent Mayr
Attorney for Brady Knowlton