

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal Action No. 21-22 (CKK)

CHRISTOPHER RAY GRIDER.

Defendant.

DEFENDANT'S UNOPPOSED MOTION TO TRAVEL

TO THE HONORABLE COLLEEN KOLLAR-KOTELLY, UNITED STATES DISTRICT COURT JUDGE FOR THE DISTRICT OF COLUMBIA:

CHRISTOPHER RAY GRIDER, the Defendant in the above styled and numbered cause, by and through undersigned counsel, moves this Court to, as an exception to his conditions of release, permit him to travel as requested below.

1. As this Court is aware from previous motions to travel, Mr. Grider subject to a condition of release that requires him to participate in a location restriction/monitoring program with a GPS leg monitor and a curfew of 10:00 pm to 6:00 am. ECF Dkt. No. 14. Furthermore, Mr. Grider's travel is restricted to within the Western District of Texas where he resides and the Southern District of Texas where undersigned counsel has his primary place of practice. *Id.*
2. Mr. Grider is requesting permission to travel to Fredericksburg, Texas (located within the Western District of Texas, approximately two and a half hours southwest of his hometown) and be away from his home from September 29 to October

1, 2022 for a short vacation with his wife. As with previous requests to travel, Mr. Grider would take his location monitoring equipment with him to monitor his movement while on this trip and provide the details of his travel to his supervision officer.

3. While this Court previously denied a request by Mr. Grider's to travel earlier this year, suggesting that his time "might be better spent reviewing discovery and discussing with his counsel how this case is to be resolved," ECF Dkt. 89, Mr. Grider can assure this Court that he has spent a considerable amount of time doing both over the past months and is prepared to proceed to trial in December as scheduled. He would greatly appreciate the opportunity to spend a short amount of time with his wife away from their business and their children, however, before "clamping down" and preparing to come to Washington, D.C. for the trial in his case.
4. Undersigned counsel conferred with the attorney for the Government, Francesco Valentini, and he is not opposed to this motion.

WHEREFORE, PREMISES CONSIDERED, Mr. Grider respectfully requests this Honorable Court permit him to travel as set out in this motion.

Date: September 26, 2022

Respectfully Submitted,

MAYR LAW, P.C.

by: /s/ T. Brent Mayr
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ATTORNEY FOR THE DEFENDANT,
CHRISTOPHER RAY GRIDER

CERTIFICATE OF CONFERENCE

I certify that I conferred with Counsel for the Government, Francesco Valentini, and he is not opposed to this motion.

/s/ T. Brent Mayr
T. BRENT MAYR

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government, Francesco Valentini and Cindy Cho, on September 26, 2022, via CM/ECF and email.

/s/ T. Brent Mayr
T. BRENT MAYR