# THE MATERA LAW FIRM

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LEAVE TO FILE GRANTED
APR. 30, 2021

*Beryl A. Howell*

April 30, 2021

**VIA EMAIL – (howell_chambers@dcd.uscourts.gov)**

The Honorable Beryl A. Howell
United States District Judge
District of Columbia
333 Constitution Ave. NW
Washington, DC 20001

> Re:   United States of America v. Greg Rubenacker
> Criminal Docket No.: 21-193 (BAH)

Dear Honorable Judge Howell:

This office represents the defendant, Greg Rubenacker in the above referenced matter. You may recall that at the time of Mr. Rubenacker's arraignment, I was still awaiting admission to the District of Columbia District Court Bar. It was my understanding that the admission was to occur in the first week of May, but I have been informed that there is an issue that is being resolved by my sponsor and the Court. That being said, I do not currently have access to file documents on the Pacer system in connection with this case.

I am writing to respectfully request a slight modification to the bail conditions pertaining to Mr. Rubenacker. The current bail conditions contain a curfew requiring Mr. Rubenacker to be home every day between the hours of 10:00 pm and 8:00 am. Mr. Rubenacker has been offered employment with a company named Loebs and Gordon Pool Care in East Hampton, New York. All of the homes he will be visiting are located in the Eastern District. He lives approximately an hour away from the company's main office and they typically work from sun up to sun down. In light of that fact, we are respectfully requesting that the be changed to require that he be at his residence from 11:00 pm to 3:00 am to account for the travel time as well as the work hours.

I have notified the Government of my intention to make this request and they have indicated that they do not have an objection.

Respectfully Submitted,

Michaelangelo Matera

MM/sm

cc:     United States Attorney's Office
        for the District of Columbia
        Attn:  AUSA Troy Edwards (via email)