

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

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Case No. 1:21-CR-00447-CJN-03
	:	
JOSHUA CHRISTOPHER DOOLIN,	:	
Defendant.	:	

**MOTION FOR TEMPORARY
MODIFICATION OF CONDITIONS OF RELEASE**

COMES NOW, Joshua Christopher Doolin, through counsel, Allen H. Orenberg, respectfully request the entry of an Oder temporarily modifying his conditions of release by allowing him to attend and participate in a charity sporting clay fund-raiser on October 15, 2022, between the hours of 8:00 a.m. and 3:00 p.m.

As grounds for this motion counsel states the following:

1. Mr. Doolin is asking the Court's permission to attend and participate in, a charity sporting clay fund-raiser on October 15, 2022, between the hours of 8:00 a.m. and 3:00 p.m. In support of his request, Mr. Doolin has written a letter to the Court which is attached as an exhibit.

To be clear, Mr. Doolin is not only asking the Court's permission to attend this charity event, but he is also asking the Court's permission to participate by shooting at sporting clays, with a shotgun provided at the event.

2. It is counsel's understanding that Mr. Doolin is in full compliance of his conditions of release.

3. The government is opposed to this motion, per Assistant U.S. Attorney Matthew Moeder.

WHEREFORE, for these reasons and such other reasons that may appear just and proper, counsel respectfully requests the entry of an Order temporarily modifying his conditions of release by allowing him to attend and participate in a charity sporting clay fund-raiser on October 15, 2022, between the hours of 8:00 a.m. and 3:00 p.m..

Respectfully Submitted,

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