

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 1:21-cr-00366-JEB**
 :
 GARY EDWARDS, :
 :
 Defendant. :

DEFENDANT'S UNOPPOSED MOTION FOR LEAVE TO TRAVEL TO HAWAII

Defendant Gary Edwards, by and through undersigned counsel, respectfully moves this Court to allow him to travel to Hawaii from August 8 to August 14 to celebrate his 45th wedding anniversary with his family. In support of this motion, Mr. Edwards states:

1. On May 10, 2021, United States Magistrate Judge Robin M. Meriweather issued an Order Setting Conditions of Release in this case. The Order requires Mr. Edwards, among other things, to obtain Court approval prior to travel outside of the continental United States.

2. Prior to his arrest and release in this case, Mr. Edwards and his family planned and bought tickets for a trip to Hawaii to celebrate his and his wife's 45th wedding anniversary. *See* airfare confirmation and receipt dated March 29, 2021, attached hereto as Exhibit A. He is scheduled to leave Philadelphia on August 8, 2021 and return August 14, 2021. At no time will he be on foreign soil.

3. Mr. Edwards has complied in all respects with the conditions of his release. This includes turning his passport over to Pretrial Services.

4. The United States, through Assistant United States Attorney Christopher Amore, does not object to this request.

WHEREFORE, Mr. Edwards respectfully requests the Court permit him to travel to Hawaii and be away from the Eastern District of Pennsylvania from August 8, 2021 to August 14, 2021.

Respectfully submitted,

 /S/
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Counsel for Defendant Gary Edwards

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 16, 2021, I served a copy of this motion and proposed order on opposing counsel by email and through the Court's electronic filing system.

 /S/
Adam D. Harris

