

**PIERCE BAINBRIDGE**

John M. Pierce  
Managing Partner  
355 S. Grand Avenue, 44th Floor  
Los Angeles, CA 90071  
jpierce@piercebainbridge.com  
(213) 400-0725

**VIA ECF**

March 26, 2021

Chief Judge Beryl A. Howell  
The U.S. District Court for the District of Columbia  
333 Constitution Avenue N.W.  
Washington D.C. 20001

**RE: *United States of America v. Worrell*, Case No. 21-MJ-00396 (BAH)**

Dear Judge Howell:

We represent Defendant Christopher Worrell (“Worrell” or “Defendant”) in the above-referenced action.

Today, Defendant filed a motion for reconsideration on Chief Judge Beryl A. Howell’s March 19, 2021 Order of Detention Pending Trial (ECF. No. 13). The attorney declaration submitted in support of Defendant’s reconsideration motion includes certain electronic files as exhibits (ECF No. 16, Ex. D.), which cannot be filed via ECF. We are requesting for a Court Order to file the hard-copy DVDs with the Clerk’s Office. Accordingly, we respectfully request an Order granting leave to do so to ensure that these exhibits are part of the record in this action.

We thank the Court for its attention to these matters.

Respectfully submitted,



John M. Pierce

cc: All counsel of Records (via ECF)