

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	CASE NO: 1:21-cr 00341
)	
Plaintiff,)	JUDGE COLLEEN KOLLAR
)	KOTELLY
)	
-vs-)	
)	
JOHN DOUGLAS WRIGHT)	<u>AGREED MOTION TO MODIFY</u>
)	<u>CONDITIONS OF RELEASE</u>
Defendant.)	
)	

Now comes Defendant, by and through Attorney Noah C. Munyer and respectfully requests that this court issue an Order Modifying Defendant's Conditions of Release to remove his stand alone monitoring and GPS requirement.

The basis for this motion is that it is necessary for Defendant to travel for employment purposes. Undersigned counsel has spoken to Assistant U.S. Attorney Jacob Strain and he stipulates to this motion and modification.

Wherefore, Defendant respectfully requests that the Court modify his conditions of pretrial release and remove his stand alone monitoring and GPS requirement.

Respectfully submitted,

/s/ Noah C. Munyer
Noah C. Munyer (0086575)
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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of May, 2021 a copy of a Notice of Appearance was filed electronically, Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. A copy was forwarded to Jacob Strain, jacob.strain@usdoj.gov All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/ Noah C. Munyer
Noah C. Munyer (0086575)
Attorney for John Douglas Wright