

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

CHRISTOPHER RAY GRIDER.

*Defendant.*

Criminal Action No. 21-22 (CKK)

**DEFENDANT’S MOTION TO EXTEND SURRENDER DATE**

TO THE HONORABLE COLLEEN KOLLAR-KOTELLY, UNITED STATES DISTRICT COURT JUDGE FOR THE DISTRICT OF COLUMBIA:

CHRISTOPHER RAY GRIDER, the Defendant in the above styled and numbered cause, by and through undersigned counsel, moves this Court to extend the date for him to surrender to the Bureau of Prisons to commence his sentence approximately thirty days. In support thereof, he would show the following.

1. On May 23, 2023, this Court sentenced Mr. Grider to a term of imprisonment of 83 months. *See* ECF Dkt. [178](#). At his request, this Court recommended that he serve his sentence at FCI-Bastrop less than two hours from his home in Eddy, Texas. *See id.*
2. The Court further permitted Mr. Grider to remain released on conditions of release and to self-surrender in July 2023 to permit him to spend time with his family, including his wife and their newborn daughter who was born just weeks prior to Mr. Grider’s sentencing, and prepare for his incarceration.

3. The Defendant recently received notice that he is to surrender at FCI-Bastrop on Wednesday, July 19, 2023.
4. Shortly after sentencing and returning to Central Texas, Mr. Grider had to take his wife to the emergency room after she developed severe abdominal pain and vomiting. Doctors discovered that her gall bladder was compacted with gall stones and had several cysts along the walls of the gall bladder. Accordingly, doctors had to perform emergency gall bladder surgery. After the surgery, Mr. Grider was responsible, not only for the care of his wife in recovery, but for their three boys and newborn baby girl.

A week after surgery, however, Mrs. Grider had to return to the hospital. This time, doctors discovered her liver was injured, possibly during the previous surgery to repair her gall bladder.

Then, just this last week, Mrs. Grider had to return to the hospital for the third time with continued complications. Doctors diagnosed her with acute pancreatitis, inflammation of the liver, a urinary tract infection, and inflammation of the bile ducts due to gallstones that were left behind after the previous surgery and admitted her for further testing and observation. She has been in the hospital for the past four days and is being released today. However, she is still unable to function and will require Mr. Grider's assistance over the next several weeks as she recovers.

5. This motion is not made for the purpose of delay. Mr. Grider has continued to comply with his conditions of release and has no intention of doing any differently.

He has done his best to prepare for his surrender. But given the complications his wife has sustained over the past month and a half, it is still necessary for him to remain at home to care for her and their four children until she is well enough to care for their children on her own.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests that this Court extend the date for him to surrender to the Bureau of Prisons to commence his sentence approximately thirty days.

Date: July 11, 2023

Respectfully Submitted,

/s/ T. Brent Mayr

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ATTORNEY FOR THE DEFENDANT

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this motion was sent to Counsel for the Government, Francesco Valentini on July 11, 2023, via ECF and email.

/s/ T. Brent Mayr  
T. BRENT MAYR