## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)(	
	)(	Criminal No. 21-204-01 (BAH)
v.	)(	Chief Judge Howell
	)(	Trial: July 18, 2022
MATTHEW BLEDSOE	)(	

## UNOPPOSED MOTION TO TEMPORARILY MODIFY CONDITIONS OF RELEASE TO PERMIT SPECIAL TRAVEL AND POINTS AND AUTHORITY IN SUPPORT THEREOF

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully moves this Honorable Court to temporarily modify his conditions of release in this case to permit him to travel to Hohenwald, Tennessee from Saturday, July 2 through Sunday, July 3, 2022. In support of this motion, Mr. Bledsoe would show:

- 1. Currently, as a condition of his release in this case, Mr. Bledsoe is restricted to travel within a 150-mile radius of Olive Branch, Mississippi without first notifying the Pretrial Services Agency. Additionally, Mr. Bledsoe is also on GPS location monitoring with a 10:00 p.m. to 6:00 a.m. curfew.
- 2. Mr. Bledsoe would like to take his family to a family event in Hohenwald, Tennessee from Saturday, July 2 to Sunday, July 3, 2022. Mr. Bledsoe plans to leave Olive Branch, Mississippi on the morning of July 2 and arrive in Hohenwald that same day. He plans to spend that night in Hohenwald. On Sunday, July 3, he will return to Olive Branch.
- 3. On June 28, 2028, undersigned counsel exchanged e-mails with Assistant United States Attorney Melanie Alsworth regarding Mr. Bledsoe's upcoming travel plans. Ms.

Alsworth graciously indicated that the government does not oppose a motion by Mr. Bledsoe to temporarily modify his conditions of release in this case to permit him to travel to Hohenwald, Tennessee from Saturday, July 2 to Sunday, July 3, 2022.

4. Conditions of release can be modified by a judicial officer at any time. 18 U.S.C. § 3142(c)(3).

WHEREFORE, the defendant, Matthew Bledsoe, moves this Honorable Court to temporarily modify his conditions of release to permit him to travel to Hohenwald, Tennessee from Saturday, July 2 through Sunday, July 3, 2022.

Respectfully submitted,

<u>/s/</u>\_\_\_\_

Jerry Ray Smith, Jr. D.C. Bar No. 448699 Counsel for Matthew Bledsoe 717 D Street, N.W.

Suite 310 Washington, DC 20004

E-mail: jerryraysmith@verizon.net

Phone: (202) 347-6101