

**UNITED STATES DISTRICT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	)	
v.	)	Case No. 21-MJ-296 (GMH)
	)	
CHRISTOPHER WORRELL,	)	
	)	
Defendant.	)	

**REPLY TO GOVERNMENT’S MEMORANDUM IN OPPOSITION TO EMERGENCY  
MOTION FOR RECONSIDERATION**

John M. Pierce (*PHV* admitted)  
**PIERCE BAINBRIDGE P.C.**  
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*Attorneys for Defendant Christopher Worrell*

Defendant Christopher Worrell, by and through his counsel, tenders this reply in response to Chief Judge Beryl A. Howell's Minute Order which instructed Mr. Worrell to explain "his failure to comply with this Court's April 1, 2021 minute order by 12:00 PM today as directed, see Min. Order (Apr. 1, 2021)". *See* Min. Order (April 5, 2021).

Counsel for Mr. Worrell apologizes and asks for leave of this Court for failure to comply with the twelve pm deadline set in the Minute Order on April 1. Counsel received new and relevant information regarding Mr. Worrell's status at 10:05 am, April 5, 2021 which required edits to Mr. Worrell's reply, causing the failure to meet the deadline.

Specifically, Mr. Worrell had been removed from the Charlotte County Jail en route to a facility in Washington D.C. This new information rendered statements of fact in Mr. Worrell's reply no longer true and accurate to the best of Counsel's abilities, thus revisions were necessary to state the facts as accurate as possible before the Court. At the same time, Counsel for Mr. Worrell was in contact with the U.S. Marshall's attempting to locate Mr. Worrell and ensure his health, given his worsening condition.

All efforts were made to comply with the Court's Minute Order, but exigent circumstances required Counsel for Mr. Worrell to make substantive revisions to reflect the circumstances as they were known to be prior to filing. As a result of these changes, Mr. Worrell failed to comply with the noon deadline set in the Minute Order on April 1. Counsel for Mr. Worrell again apologizes for the its failure to comply with the Minute Order, but believed it necessary to supply the Court with correct and accurate information at the time of the filing.

Dated: April 5, 2021

Respectfully Submitted,

/s/ John M. Pierce

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