

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA )  
 )  
 v. ) No. 1:21-cr-104 (RJL)  
 )  
 KLETE DERIK KELLER, )  
 )  
 Defendant. )

**GOVERNMENT’S UNOPPOSED MOTION FOR PERMISSION TO  
APPEAR REMOTELY AT DECEMBER 16, 2021, STATUS HEARING**

The government respectfully moves the Court for permission to appear at the December 16, 2021, status hearing remotely via Zoom. Defense counsel does not oppose this motion.

On September 29, 2021, the defendant, Klete Derik Keller pleaded guilty before the Court to one count of 18 U.S.C. § 1512(c)(2). ECF 24. As part of the defendant’s plea agreement, he agreed to cooperate with the government’s investigation. *Id.* After the parties jointly moved to defer the defendant’s sentencing pending his cooperation, the Court scheduled the December 16, 2021, status hearing, in part, for the parties to update the Court regarding the status of the defendant’s cooperation. Given the defendant’s location in another district, the Court agreed to allow the defendant to appear at the status hearing remotely.

Government and defense counsel now jointly move the Court for permission to appear at the December 16, 2021, status hearing remotely. Both assigned government attorneys are currently in another jurisdiction and, while another prosecutor is available to represent the government’s interest should the hearing be held in person, the assigned prosecutors stand ready to provide a full report on the defendant’s cooperation via a remote proceeding similar to the previous status hearings held in this case. If the Court were to grant this motion, the defendant’s counsel would also appear remotely if permitted, though he stands ready to appear in person if need be.

Before the December 16, 2021, status hearing, the parties intend to file a joint status report to further aid the Court with a written update on the status of the defendant's cooperation to supplement the parties' oral update at the status hearing.


**CONCLUSION**

For the foregoing reasons, the government requests permission to appear before the Court at the December 16, 2021, status hearing remotely.

Respectfully submitted,

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By:

  
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