

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

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
v.	:	<b>No. 1:21cr-00026-CRC</b>
	:	
<b>CHRISTOPHER ALBERTS,</b>	:	
<b>Defendant.</b>	:	

**CONSENT MOTION TO TEMPORARILY REMOVE  
DEFENDANT’S GPS MONITORING DEVICE**

COMES NOW, Defendant, Christopher Alberts, by and through attorney Allen H. Orenberg and hereby respectfully moves this Court for the entry of an Order directing the United States Probation Office to temporarily remove the defendant’s GPS monitoring device on March 8, 2022, from 8:00 a.m. until not later than then end of the next business day, in order for him to receive proper medical treatment.

As grounds, the following is stated:

1. Mr. Alberts injured his left hand. As part of this ongoing course of treatment, a MRI procedure is medically required and this type of procedure may not be safely conducted when the GPS device is attached to the defendant.
  
2. It is counsel’s understanding the MRI procedure will occur on March 8, 2020, (1:00 p.m.) at Advanced Radiology, located at 9110 Philadelphia Avenue, Suite 114, Baltimore, MD 21237. (Tel. No. 888-970-9700)

4. An MRI examination may not be performed while a person is wearing a GPS monitoring device. Accordingly, the GPS monitoring device should be removed, temporarily, by the United States Probation Office (per instructions by USPO John Stagg – MDXDM) at or about 8:00 a.m. on March 8, 2021. After the MRI procedure is completed, the defendant will promptly report to U.S. Probation Office, no later than the end of the next business day for the re-installation of the GPS monitoring device.

5. The Government (per AUSA Jordan Koeing) consents to Mr. Randolph having his GPS ankle monitor removed for the sole purpose of the medically-necessary MRI procedure at Advanced Radiology.

6. All other conditions of release remain in full force and effect.

WHEREFORE, for the foregoing reasons and such other reasons that may appear just and proper, defendant Christopher Alberts respectfully moves this Court for the entry of an Order directing the United States Probation Office to temporarily remove the defendant's GPS monitoring device on March 8, 2022, from 8:00 a.m. until not later than then end of the next business day, in order for him to receive proper medical treatment as described herein.

Respectfully Submitted,

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Dated: March 1, 2022