

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

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:21-cr-00116
)	
WILLIAM MCCALL CALHOUN, JR)	
<i>Defendant.</i>)	

**DEFENDANT’S SECOND MOTION TO MODIFY
CONDITIONS OF PRETRIAL RELEASE**

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through his undersigned counsel, Jessica N. Sherman-Stoltz, Esq., and respectfully requests that this Honorable Court modify its March 9, 2021 and July 8, 2021 Orders Setting Conditions of Release (ECF Document Number 23 and July 8, 2021 Minute Order), by allowing Defendant to reside in Americus or Andersonville when he has multi-day trials out of the Macon area. In support, he states as follows:

1. Per this Court’s March 9, 2021, Order Setting Conditions of Release, Defendant is placed in the custody of his sister, Mary Calhoun, and is to reside at her house in Macon, GA.
2. Defendant’s law practice includes representing clients that live in areas outside of Macon, GA. The majority of Defendant’s clients are in court proceedings in Sumter County, GA, and the adjacent counties. Sumter County consists of the cities Americus, Plains, Andersonville, Leslie, and De

Soto.

3. Areas in Sumter County are up to a 3-hour roundtrip drive from Macon, GA.
4. Defendant is requesting that he be allowed to stay overnight, in either Americus (at an apartment within his office) or Andersonville (at his sister, Mary Calhoun's, second home), when he has multi-day trials in Sumter County, GA, and the adjacent counties.
5. Defendant is counsel of record in an upcoming murder trial in Sumter County that is currently scheduled to begin on Monday, August 23, 2021.
6. Due to Defendant's current conditions of bail that require him to reside in Macon, GA, he previously requested a continuance of the upcoming murder trial, but as of August 17, 2021, his motion has not been ruled on.
7. The 3-hour round trip drive to and from Macon, GA, is valuable time in which Defendant could be preparing, and/or resting, for the next day's trial proceedings.
8. Defendant will be appearing in court each day during these trial proceedings, so his whereabouts will be readily known and easily verified.
9. Defendant has been compliant while under pretrial supervision.

WHEREFORE, for the foregoing reasons, it is respectfully requested that the Court grant Defendant's Second Motion to Modify Conditions of Pretrial Release, enter an order allowing him to reside in Americus or Andersonville during multi-day trials in

Sumter County and adjacent counties, and that this Motion be heard before August 23, 2021, in light of the commencement of a week-long murder trial in Sumter County where Defendant is counsel of record and the Judge has not yet ruled on his Motion to Continue.

Dated: August 18, 2021

Respectfully Submitted,
WILLIAM MCCALL CALHOUN, JR.

/s/ Jessica N. Sherman-Stoltz
Jessica N. Sherman-Stoltz, Esq.
Virginia State Bar #90172
Sherman-Stoltz Law Group, PLLC.
P.O. Box 69, Gum Spring, VA 23065
Phone: (540) 760-7612
Fax: (540) 572-4272
Email: jessica@sslawgroupva.com

CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 18th day of August 2021, a true and correct copy of the foregoing *Defendant's Second Motion to Modify Conditions of Pretrial Release* with the Clerk of Court via the CM/ECF system, which will automatically send an email notification of such filing to all counsel of record.

/s/ Jessica N. Sherman-Stoltz
Jessica N. Sherman-Stoltz, Esq.
Virginia State Bar #90172
Sherman-Stoltz Law Group, PLLC.