## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
V.	)	CRIMINAL NO. 21-177 (CRC)
	)	
	)	
DANIEL D. EGTVEDT.	)	

## UNOPPOSED MOTION FOR TEMPORARY MODIFICATION OF PRETRIAL RELEASE CONDITIONS

COMES NOW Kira Anne West, counsel for Mr. Daniel D. Egtvedt in the above captioned case, and asks this Honorable Court to order a temporary modification in pretrial release conditions for the below reasons and in support states the following:

As this Court knows, Mr. Egtvedt is charged with numerous counts, both misdemeanors and felonies, in the January 6, 2021, riot at the Capitol. As the Court also knows, Mr. Egtvedt has been completely compliant with his pretrial release conditions.

On March 29th, undersigned counsel filed an unopposed motion to modify conditions of release temporarily with the dates April 11-13. This Court granted the motion. Unfortunately, yesterday, Mr. Egtvedt's elderly mother fell and suffered numerous medical issues which caused her immediate hospitalization. She was transferred from the local hospital to Morgantown, W. Va. yesterday.

Specifically, Mr. Egtvedt requests that he be allowed to stay in Morgantown, W. Va. until his mother is safely out of surgery and transferred to another facility depending upon where and when she will recuperate. Mr. Egtvedt has provided detailed facts about her condition and location to undersigned counsel and to his supervising pretrial officer.

Undersigned counsel will keep the parties apprised of the situation as decisions are made.

United States Attorney's Office AUSA's. Mr. Liebman has no opposition to three day extension which would include Thursday, Friday and Saturday. Undersigned counsel also spoke to Mr. Copes who does not oppose this motion. In the event further developments call for a further extension, Mr. Copes defers to this Honorable Court. Undersigned counsel has made sure that Mr. Egtvedt is taking his daily medications with supervision.

Mr. Egtvedt respectfully requests that this Court order pretrial services to temporarily allow him to stay in Morgantown, W. Va., to include travel to the hospital with his brother until his mother is released from the hospital and transferred to a rehab facility, which hopefully will be by this weekend. Mr. Egtvedt understands that he must give exact specifics with regard to times of arrival and departure to pretrial services and his lawyer.

Respectfully submitted,

KIRA ANNE WEST

By: \_\_\_\_\_/s/\_

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## **CERTIFICATE OF SERVICE**

I hereby certify on the 13th day of April, 2022 a copy of same was delivered to the
parties of record, by email, pursuant to the Covid standing order and the rules of the Clerk of
Court.
/S/
Kira Anne West