

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

UNITED STATES OF AMERICA,)	
)	
v.)	No. 21-mj-436
)	
SEAN MICHAEL MCHUGH,)	
)	
Defendant.)	
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UNOPPOSED MOTION FOR STAY OF TRANSPORTATION ORDER

Defendant Sean McHugh, by and through counsel, and with the consent of the government, respectfully moves the Court to order the United States Marshal Service not transport the defendant to Washington, D.C. until the resolution of his bond review. In support of this motion, the defendant provides the following facts:

1. On May 24, 2021, Mr. McHugh was charged by complaint for alleged violations of 18 U.S.C. §1752(a)(1), (a)(2), and (a)(4), 40 U.S.C. §§ 5104 (e)(2)(D), and (e)(2)(F), 18 U.S.C. § 231(a)(3), 18 U.S.C. §111(a)(1) and (b), and 18 U.S.C. § 1512(c)(2).
2. On May 27, 2021, Mr. McHugh was arrested in Auburn, CA and appeared in the Eastern District of California on May 28, 2021 for a removal hearing. Mr. McHugh requested a detention hearing and the court scheduled one for June 1, 2021.
3. On June 1, 2021, Mr. McHugh was ordered detained pending trial after a detention hearing and ordered to be committed to the District of Columbia.
4. Mr. McHugh plans to request that the Court review the detention decision of the Honorable United States Magistrate Judge Kendall J. Newman.
5. In light of the impending motion for a bond review, Mr. McHugh respectfully

requests that the Court issue an Order staying the transportation order entered on June 1, 2021.

6. Mr. McHugh remaining in Sacramento pending his bond review before this Court would save enormous time and resources in the event that he is ultimately ordered to be released.

Based on the above circumstances, Mr. McHugh respectfully requests that the Court grant the attached proposed order staying the transportation order entered on June 1, 2021.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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ORDER

Upon consideration of the Unopposed Motion for Stay of Transportation Order, it is this
_____ day of _____, 2021

ORDERED that said motion be, and hereby is, GRANTED and, further

ORDERED that the United States Marshal Service be directed not to transport the
defendant until resolution of his bond review before this Court.

Dated _____, day of _____, 2021.

Honorable Beryl A. Howell
Chief United States District Judge