

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

_____ )	
UNITED STATES, )	
)	
v. )	Crim. No. 21cr268
)	Hon. Carl J. Nichols
JEFFREY McKELLOP, )	
Defendant. )	
_____ )	

**DEFENDANT’S EMERGENCY MOTION FOR RELIEF**

Comes now Defendant Jeffrey McKellop, by counsel, and moves the Court for emergency relief.

Undersigned was informed yesterday by the government that the government yesterday executed a search of Defendant’s cell at the Central Detention Facility (“CTF”) of the D.C. Jail. Undersigned had no advance notice of the search. The warrant for the search was secured from a Magistrate Judge as opposed to the District Judge presiding over this case since its indictment.

As of the time of the search, Defendant had been engaged for some time in the formulation of notes at the behest of undersigned for use in the preparation of his defense. Consequently, an indeterminate amount of the documents seized constitute Work Product and/or Attorney-Client Communication.

Undersigned has requested from the government, but has not received, a copy of the affidavit tendered in support of the application for the search warrant.

Wherefore, Defendant requests that the government be enjoined immediately from any review of the seized documents until the Court can convoke a hearing to determine:

- a. The how and why of the government’s decision to seek the warrant;

