

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BRADY KNOWLTON,

Defendant

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Case No. 21-CR-00046-RDM

DEFENDANT’S UNOPPOSED MOTION TO TRAVEL

TO THE HONORABLE RANDOLPH D. MOSS, UNITED STATES DISTRICT
JUDGE FOR THE DISTRICT OF COLUMBIA:

BRADY KNOWLTON, the Defendant in the above-styled and numbered cause,
by and through undersigned counsel, requests this Court permit him to travel to Ha-
waii. In support thereof, he would show the following.

1. On April 7, 2021, Mr. Knowlton was released on conditions of release by a magis-
trate judge for the District of Utah that required *inter alia* that he abide by certain
travel restrictions, namely, that he not travel outside the state of Utah without
permission from the pretrial officer and not travel outside the United States with-
out prior permission from the Court. That condition was slightly modified by Mag-
istrate Judge G. Michael Harvey on April 12, 2021 such that this Court was to
“approve all [] travel outside of the *continental* U.S.” (Doc. No. 16 , Condition 7(f))
(emphasis added).
2. Mr. Knowlton seeks permission to travel to Hawaii from December 29, 2021 to
January 2, 2022.

3. Undersigned counsel conferred with Mr. Knowlton's pretrial supervision officer, Devin Dalton, and confirmed that he has been fully compliant with his conditions of release and does not oppose this travel. Undersigned counsel has further conferred with counsel for the Government, James Peterson, and he is not opposed to this motion.

WHEREFORE, PREMISES CONSIDERED, Mr. Knowlton respectfully requests this Court permit him to travel to Hawaii as requested.

Date: December 14, 2021

Respectfully Submitted,

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ATTORNEYS FOR THE DEFENDANT,
BRADY KNOWLTON

CERTIFICATE OF CONFERENCE

I certify that I conferred with both James Peterson, attorney for the Government, and Devin Dalton, Pretrial Services Officer for the District of Utah assigned to supervise Mr. Knowlton, and both do not object to his motion.

/s/ T. Brent Mayr

Brent Mayr

Attorney for Brady Knowlton

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government on August 9, 2021, via CM/ECF and by email to Devin Dalton, Pretrial Services Officer for the District of Utah assigned to supervise Mr. Knowlton on the same date.

/s/ T. Brent Mayr

Brent Mayr

Attorney for Brady Knowlton

