

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

UNITED STATES OF AMERICA)	
)	Criminal No. 21-204-01 (BAH)
v.)	Chief Judge Howell
)	Status: November 19, 2021
MATTHEW BLEDSOE)	

**UNOPPOSED
MOTION TO TEMPORARILY MODIFY CONDITIONS OF RELEASE
TO PERMIT SPECIAL WORK TRAVEL
AND POINTS AND AUTHORITY IN SUPPORT THEREOF**

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully moves this Honorable Court to temporarily modify his conditions of release in this case to permit him to travel to Marshall, Arkansas from October 22 through October 24, 2021 for work purposes. In support of this motion, Mr. Bledsoe would show:

1. As has been discussed at earlier hearings and verified by the Pretrial Services Agency (PSA), Mr. Bledsoe owns a moving company in Memphis, Tennessee. Most of Mr. Bledsoe's business is for moves that occur within the Memphis area. However, on occasion, Mr. Bledsoe does do moves that are outside the area.

2. Currently, as a condition of his release in this case, Mr. Bledsoe is restricted to travel within a 150-mile radius of Memphis, Tennessee without first notifying the Pretrial Services Agency. Additionally, Mr. Bledsoe is on GPS location monitoring with a 10:00 p.m. to 6:00 a.m. curfew.

3. Mr. Bledsoe currently has an upcoming moving job scheduled that will take him outside a 150-mile radius of Memphis and conflict with his curfew. The moving job will take

Mr. Bledsoe out of the Memphis area from October 22 through October 24, 2021. Mr. Bledsoe will leave the Memphis area on October 22. He will do the moving job in Marshall, Arkansas on October 23 and 24. And he will return to the Memphis area by the end of the day on October 24.

4. On October 14, 2021, undersigned counsel spoke by phone with Assistant United States Attorney Mitra Jafary-Hariri. Ms. Jafary-Hariri graciously indicated that the government does not oppose this motion by Mr. Bledsoe to temporarily modify his conditions of release in this case to permit him to travel for work purposes to Marshall, Arkansas from October 22 through October 24, 2021.

5. Conditions of release can be modified by a judicial officer at any time. 18 U.S.C. § 3142(c)(3).

WHEREFORE, the defendant, Matthew Bledsoe, moves this Honorable Court to temporarily modify his conditions of release in this case to permit him to travel for work purposes to Marshall, Arkansas from October 22 through October 24, 2021.

Respectfully submitted,

/s/
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