

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

UNITED STATES,)	
)	
)	
v.)	Crim. No. 21cr40
)	Hon. Trevor McFadden
CHRISTOPHER JOSEPH QUAGLIN,)	
Defendant.)	

**PLAINTIFF’S MOTION FOR AN EMERGENCY HEARING ON DEFENDANT’S
EMERGENCY MOTION FOR IMMEDIATE PRE-TRIAL RELEASE**

Comes now Defendant Christopher Quaglin, by counsel, and moves the Court to order a hearing scheduled for August 23, 2022 to hear Defendant’s Emergency Motion for Immediate Pre-trial Release.

On August 21, 2022, Defendant Christopher Quaglin by his undersigned counsel filed an Emergency Motion for Immediate Pre-Trial Release on the basis of, *inter alia*, an imminent threat of severe bodily harm to the Defendant due to deliberate indifference to his serious medical condition compounded with the conditions of confinement at the Northern Neck Regional Jail. Because of the urgent and timely nature of Defendant’s Motion, Defendant respectfully requests that a hearing be scheduled for Tuesday, August 23, 2022, or as soon as possible thereafter.

Dated: Washington, DC
August 22, 2022

Respectfully submitted,

[/s/ Joseph D. McBride, Esq.](#)

Bar ID: NY0403

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Counsel for the Defendant

Certificate of Electronic Service

I hereby certify that on August 10, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, with consequent service on all parties.

/s/ Joseph D. McBride, Esq.