

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

UNITED STATES OF AMERICA,)

)

V.)

)

No. 21-cr-52 (TJK)

MATTHEW GREENE,)

Defendant.)

)

**DEFENDANT’S UNOPPOSED MOTION TO ALLOW THE DEFENDANT TO ATTEND
FUNERAL SERVICES**

Defendant Matthew Greene, by and through undersigned counsel, submits the following unopposed motion seeking the Court’s permission for the Defendant to attend funeral services for his aunt, Ms. Linda Blazek, on August 12, 2023.

On December 22, 2021, the Defendant entered a guilty plea, pursuant to a cooperation agreement with the government and the Court. On March 10, 2022, the Court granted the unopposed motion of counsel to release the Defendant to home incarceration in the Northern District of New York, while he is awaiting sentencing. The terms of home incarceration included electronic location monitoring.

We are respectfully asking the Court’s permission for Mr. Greene to attend services on August 12, 2023, in St. Lawrence County, New York. The specific address is about ninety minutes from Mr. Greene’s home and has been provided to pretrial services in Syracuse, New York. Mr. Greene will return to his home the same day.

Undersigned counsel has spoken with a representative from the United States Probation Department in the Northern District of New York and confirmed that Mr. Greene has been in compliance with the terms set forth by the Court. Additionally, counsel has conferred with Assistant United States Attorney Erik Kenerson and the government does not oppose the relief sought in this motion.

WHEREFORE, the Defendant respectfully requests that he be permitted to attend funeral services for his aunt on August 12, 2023.

Dated: 8\9\23

Respectfully submitted,

/s/ Michael Kasmarek, Esq.

Bar roll number: 702427

Attorney for the Defendant

Kasmarek Law Office, PLLC

440 East Washington Street

Syracuse, New York 13202

/s/ Michael Spano, Esq.

Bar roll number:

Attorney for the Defendant

Spano Law Office, PLLC

220 South Warren Street

Syracuse, New York 13202