



3. Defendant is requesting that he be allowed to move to Andersonville, GA, and reside at his sister, Mary Calhoun's, second home.
4. Defendant's law practice includes representing clients that live in areas outside of Macon, GA. The majority of Defendant's clients are in court proceedings in Sumter County, GA, and adjacent counties. Sumter County consists of the cities Americus, Plains, Andersonville, Leslie, and De Soto.
5. Areas in Sumter County are up to a 3-hour roundtrip drive from Macon, GA, and the requirement of living 77.2 miles away from his place of work has become very burdensome.
6. The gas cost and wear and tear on his vehicle is excessive and costly, but more importantly, the time constraint imposed by this distance is having a negative effect on his ability to get his work done in the practice of law.
7. In addition to keeping his prior diagnosis of prostate cancer at bay, the minimum of three hours of travel time that the Defendant has been driving every day since the middle of March, is taking a toll on his physical health.
8. Defendant has cataracts in his right eye, which makes driving at night even more challenging, especially since daylight savings and the days growing shorter of daylight. Defendant was in a minor accident two weeks ago when it was dark and raining, causing him to hit a guardrail. Thankfully he wasn't hurt, but it was a scary revelation as to his safety on the road, particularly

when it's dark outside.

9. Lastly, Defendant's Mother, who lives close to his sister's Andersonville house, has fallen several times over the past couple of weeks, and has been hospitalized twice as a result. Defendant needs to be closer to her so that he can help her and get to her more quickly as her condition might require.
10. On a regular basis Defendant is either going to court, visiting a client in jail, or in contact with a Judge, prosecutor, or law enforcement official, so his whereabouts will be readily known and easily verified. He is not a flight risk.
11. Defendant has been compliant while under pretrial supervision.
12. Undersigned counsel has brought this request to the Government's attorney to get their position on the matter, but has not yet received a response, and with a status hearing coming up on December 2, 2021, counsel did not want to miss an opportunity to have this request heard by the Court.

WHEREFORE, for the foregoing reasons, it is respectfully requested that the Court grant Defendant's Third Motion to Modify Conditions of Pretrial Release, enter an order allowing him to reside in Andersonville, and that this Motion be heard on December 2, 2021, at the currently scheduled status hearing in the case at hand.

Dated: November 28, 2021

Respectfully Submitted,  
WILLIAM MCCALL CALHOUN, JR.

/s/ Jessica N. Sherman-Stoltz

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**CERTIFICATE OF SERVICE**

I hereby CERTIFY that on this the 28th day of November 2021, a true and correct copy of the foregoing *Defendant's Third Motion to Modify Conditions of Pretrial Release* with the Clerk of Court via the CM/ECF system, which will automatically send an email notification of such filing to all counsel of record.

/s/ Jessica N. Sherman-Stoltz  
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