UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES)	
)	
V.)	Case No. 1:21-cr-117-1 (TFH)
)	
RYAN NICHOLS)	
)	
)	

MOTION TO AMEND CONDITIONS OF RELEASE TO ALLOW THE DEFENDANT TO ACCESS TO GOOGLE DOCS AND GOOGLE SHEETS FOR THE SOLE PURPOSE OF SHARING DOCUMENTS AND SPREADSHEETS WITH HIS ATTORNEYS ONLINE

Ryan Nichols, by and through counsel, hereby request that the Court amend the Court's Order of release (ECF No. 180) to allow for Mr. Nichols to access Google Docs and Google Sheets so that he can share documents and spreadsheets with his attorneys in realtime.

The Court's order allows for Mr. Nichols to use the internet with limited access. It also allows for Mr. Nichols to use Microsoft Word and Microsoft Excel. Mr. Nichols and his attorneys have found that using Microsoft products is cumbersome and time consuming because it requires Mr. Nichols and his attorneys send emails back and forth each time a change to a document or spreadsheet is made. Google Docs and Google Sheets allows both parties to share changes in real time and does not require the production of new versions each time a change is made. Allowing the use would simply allow Mr. Nichols to go to Google.com/documents and Google.com/spreadsheets and maintain online folders containing documents and spreadsheets that can be shared with his attorneys. He will not use the Google products for any other purpose other than preparing for trial.

Undersigned counsel spoke with Jaynice Harden from pretrial services and she said that pretrial services have no objection to this amendment. Undersigned counsel also contacted the Government and they do not oppose this motion.

Accordingly, we respectfully request that the Court amend the order to allow for the use of Google Docs and Google Sheets.

Dated: December 29, 2022

/s/ Jonathan Gross
Jonathan Gross
Bar ID MD0162
2833 Smith Ave, Suite 331
Baltimore, MD 21209
(443) 813-0141
jon@clevengerfirm.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being served on opposing counsel via email on December 29, 2022.

/s/ Jonathan Gross