

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

UNITED STATES OF AMERICA,

v.

RYAN TAYLOR NICHOLS

Defendant.

Case No. 21-CR-117 (RCL)

SUPPLEMENT TO MOTION TO CONTINUE

Mr. Nichols was happy, healthy, fit, strong, and handsome before the Government took him away on January 18, 2021. He was noticeably different when his wife, mother, and undersigned counsel picked him up from jail on November 22, 2022. Now, months after his November release, he is a shell of his former self. Mr. Nichols’ physical and mental health steadily declined during the twenty-two months he was incarcerated in highly unsanitary conditions with limited access to sunlight, ventilation, personal hygiene supplies, adequate nutrition, and quality medical care. Consequently, Mr. Nichols now suffers from multiple psychological and physiological illnesses. Mr. Nichols was denied reasonable access to medical care during the pendency of his pretrial detention, during which multiple requests for treatment related to PTSD, ear infections, and many other medical issues either went unanswered or were met with indifferent “medical treatment” that grossly deviated from any reasonable standard of medical care. As a result, Mr. Nichols’s PTSD is unmanaged. He has serious paranoia, severe hair loss, depression, nightmares, and other medical issues— including what appears to be active liver disease. Mr. Nichols’ psychiatric issues are complex and exasperating. Like Senator John Fetterman, who needs rest, compassion, and treatment. So too does Ryan Nichols. Because of these reasons, undersigned counsel respectfully submits that it is unconscionable for Mr. Nichols to stand trial at this time.

Dated: New York, NY
March 9, 2022

Respectfully submitted,

/s/ Joseph D. McBride, Esq.

Bar ID: NY0403

THE MCBRIDE LAW FIRM, PLLC

99 Park Avenue, 6th Floor

New York, NY 10016

p: (917) 757-9537

e: jmcbride@mcbridelawnyc.com

Counsel for the Defendant