UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA,

v.

RACHEL POWELL,

Defendant.

Case No. 1:21-cr-179-RCL

POWELL'S MOTION FOR PERMISSION TO TRAVEL

The Court has scheduled an in-person hearing for July 18 at 11:00 a.m. to announce its verdict after a bench trial in this matter. Powell moves the Court for permission to travel to Washington, D.C., on the morning of July 17 and to return home to Pennsylvania on the morning of July 19 (assuming she is not taken into custody). On her way to and from the district for trial, Powell encountered heavy traffic that significantly extended her travel time. For this hearing she will be traveling with her entire family which boasts a great many members. Powell also wants to ensure she has sufficient time to check in and out of the Airbnb residence she has rented for the occasion. For all these reasons, Powell respectfully requests permission to begin her trip one day before the hearing and to leave one day after it.

Dated: July 3, 2023

Respectfully submitted,

/s/ Nicholas D. Smith Nicholas D. Smith, D.C. Bar No. 1029802 1123 Broadway, Suite 909 New York, NY 10010 (917) 902-3869 nds@davidbsmithpllc.com *Counsel to Rachel Powell*

Certificate of Service

I hereby certify that on the 3rd day of July, 2023, I filed the foregoing motion with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following CM/ECF user(s):

Karen Rochlin Assistant United States Attorney 555 4th Street, N.W., Room 4408 Washington, D.C. 20530 (202) 252-6986

And I hereby certify that I have mailed the document by United States mail, first class postage prepaid, to the following non-CM/ECF participant(s), addressed as follows: [none].

/s/ Nicholas D. Smith Nicholas D. Smith, D.C. Bar No. 1029802 1123 Broadway, Suite 909 New York, NY 10010 (917) 902-3869 nds@davidbsmithpllc.com *Counsel to Rachel Powell*