UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)(
)(Criminal No. 21-204-01 (BAH)
v.)(Chief Judge Howell
)(Status: July 16, 2021
MATTHEW BLEDSOE)(<u>-</u>

UNOPPOSED MOTION TO TEMPORARILY MODIFY RELEASE CONDITIONS BY LIFTING CURFEW FOR JULY 4-JULY 5 OVERNIGHT PERIOD AND POINTS AND AUTHORITY IN SUPPORT THEREOF

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully moves this Honorable Court to temporarily modify his release conditions in this case by lifting his curfew for the overnight period of July 4 to July 5, 2021. Mr. Bledsoe makes this request so that he can take his children for an overnight visit with their grandparents from July 4 to July 5, 2021. In support of this motion, Mr. Bledsoe would show:

- 1. Currently, as a condition of his release in this case, Mr. Bledsoe is subject to a curfew that requires him to be in his home from 10:00 p.m. to 6:00 a.m.
- 2. On July 4, 2021, Mr. Bledsoe and his wife would like to take their children on an overnight trip to visit with their grandparents near Hohenwald, Tennessee. The plan is to travel to the Hohenwald area after 6:00 a.m. on Sunday, July 4, 2021, spend the night there, and then return home to the Memphis area before 10:00 p.m. on Monday, July 5, 2021. Accordingly, to

1

¹ As a condition of his release, Mr. Bledsoe is to notify the Pretrial Services Agency (PSA) for the Western District of Tennessee, which is supervising him as a courtesy to PSA for the District of the District of Columbia, in advance of travel outside of a 150-mile radius of Memphis, Tennessee. It appears that Mr. Bledsoe's travel for the period of July 4 to July 5, 2021 will take him close to the limit of that radius—but not outside of it. Further, as a precaution, Mr. Bledsoe will advise PSA for the Western District of Tennessee in advance of the travel.

be able to make such a trip, Mr. Bledsoe is requesting that his curfew be lifted for the overnight period of July 4 to July 5.

- 3. On June 25, 2021, undersigned counsel spoke with Assistant United States Attorney Mitra Jafary-Hariri. Counsel explained to Ms. Jafary-Hariri the substance and purpose of this motion. Ms. Mitra Jafary-Hariri graciously indicated that the government does not oppose this motion by Mr. Bledsoe to lift his curfew restriction for the overnight period of July 4 to July 5, 2021.
- 4. Conditions of release can be modified by a judicial officer at any time. 18 U.S.C. § 3142(c)(3).

WHEREFORE, the defendant, Matthew Bledsoe, moves this Honorable Court to temporarily modify his release conditions in this case by lifting his curfew for the overnight period of July 4 to July 5, 2021.

Respectfully submitted,

/s/

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