

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

UNITED STATES OF AMERICA, :

v. :

**:
:
:**

No. 21-CR-563 (JDB)

**VICTORIA CHARITY WHITE, :
Defendant. :**

**DEFENDANT WHITE’S MOTION TO APPEAR REMOTELY FOR
PRETRIAL CONFERENCE**

COMES NOW Defendant, Victoria Charity White, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for the entry of an Order allowing Ms. White to appear remotely via video conference technology for her upcoming pretrial conference on April 28, 2023. In support of this motion Ms. White asserts the following:

1. Trial is set for May 8, 2023 in this matter,
2. A pretrial conference is set for April 28, 2023 at 3:00pm. (ECF 54).
3. Ms. White qualifies for appointed counsel as an indigent in this matter.
4. It is a financial hardship for Ms. White to travel to the District of Columbia for the pretrial conference.

5. Ms. White is the sole caretaker of her daughters and finding childcare is a hardship for this pretrial conference as she is already securing childcare for her upcoming trial dates.
6. The travel to and from Minnesota would take Ms. White at least one day each way by car, which is her least expensive and preferred method of transportation.
7. This trip would then have to be done again less than a week later for her to arrive in Washington, D.C. in time to meet with her attorney prior to her trial date and attend her own trial.

For these reasons Ms. White respectfully requests permission to appear remotely for the pretrial conference in this case scheduled for April 28, 2023 at 3:00pm in Courtroom 30.

Respectfully Submitted,

/s/ Nicole Cubbage

Nicole Cubbage

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Attorney for Victoria Charity White

Certificate of Service

I certify that a copy of the forgoing was filed electronically for all parties of record on this 24^h day of February, 2023.

_____/s/_____

Nicole Cabbage
Attorney for Ms. White

Dated: February 24, 2023