

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

<b>UNITED STATES OF AMERICA</b>	:	<b>1:21-CR-618-ABJ</b>
	:	
<b>v.</b>	:	
	:	
<b>RILEY JUNE WILLIAMS</b>	:	

**DEFENDANT’S MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL OBJECTIONS TO THE SENTENCING RECOMMENDATION**

Defendant Riley June Williams, by and through her attorneys, submits the within motion for leave to file supplemental objections to the Sentencing Recommendation (Doc. 144).

1. Sentencing in this matter is scheduled for March 23, 2023 at 9:30 a.m.
2. On February 15, 2023, the Final Presentence Investigation Report (“PSR”) and Sentencing Recommendation were filed in this matter. (Docs. 143 and 144).
3. The Sentencing Recommendation contains several proposed conditions of release that the defense did not have an opportunity to review before submitting objections to the draft PSR.
4. Ms. Williams has objections to several of the proposed conditions of release contained in the Sentencing Recommendation and defense counsel requests an opportunity to file a brief for the Court’s consideration. The brief has been prepared and can be filed forthwith.

Wherefore, Defendant respectfully requests that this Honorable Court grant her leave to file supplemental objections to the Sentencing Recommendation.

Date: March 2, 2023

Respectfully submitted:

/s/ Lori J. Ulrich

LORI J. ULRICH, ESQUIRE  
Assistant Federal Public Defender

/s/ Brandon R. Reish

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**CERTIFICATE OF SERVICE**

I, Lori J. Ulrich, Esquire, of the Federal Public Defender's Office, do hereby certify that I served a copy of the foregoing **Defendant's Motion for Leave to File Supplemental Objections to Sentencing Recommendation** via Electronic Case Filing, and/or by placing a copy in the United States mail, first class in Harrisburg, Pennsylvania, and/or by hand delivery, addressed to the following:

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RILEY JUNE WILLIAMS

Date: March 2, 2023

*/s/ Lori J. Ulrich*  
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