

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Case No. 21-CR-00708(RCL)
 :
 LEO KELLY. :
 :
 Defendant. :

**DEFENDANT’S EMERGENCY MOTION FOR RELEASE PENDING
APPEAL**

Pursuant to 18 U.S.C. Section 3143(b) and Fed. R. Crim P. 46(c), defendant LEO KELLY respectfully moves for his release pending appeal on the conditions of release previously imposed. Release should be granted for the reasons set forth in the accompanying memorandum of law. As Mr. Kelly could be ordered to report to BOP any day, he respectfully requests expedited treatment of this motion.

Respectfully submitted,

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Certificate of Service

I certify that a copy of the forgoing was filed electronically for all parties of record on this 15th day of September, 2023.

/s/ Kira West

Kira Anne West
Attorney for Mr. Kelly