

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

)	
UNITED STATES OF AMERICA,)	
)	Case No. 1:21-cr-392-RCL
)	
v.)	
)	
FELIPE ANTONIO MARTINEZ, et al.,)	
)	
Defendants.)	
)	

DEFENDANT MARTINEZ’S UNOPPOSED MOTION TO TRAVEL

Defendant Martinez, through his counsel, files this unopposed motion to travel. On June 29, the Court entered an order setting Martinez’s conditions of release. ECF No. 34. At the time, Martinez was working in Travis County, Texas. As a pipelayer, Martinez works temporary, ad hoc construction projects. His current work project in Texas just concluded.

Martinez’s family resides in Riverside County, California. With no objection from the U.S. Attorney’s Office or the pretrial services offices in Austin, Texas and Washington, D.C., Martinez moves the Court to permit him to travel back to his home and family in Riverside County. The pretrial services office in D.C. has advised counsel that the appropriate pretrial services office in California has already assigned an officer to Martinez but that the office requests an order from the Court permitting Martinez to travel from Texas to California. Beyond reuniting with his family, Martinez will be able to review electronic discovery materials in his case at his home in California, unlike in Travis County.

Dated: August 26, 2021

Respectfully submitted,

/s/ Nicholas D. Smith
 Nicholas D. Smith, D.C. Bar No. 1029802
 David B. Smith, PLLC

7 East 20th Street, Suite 4R
New York, NY 10003
(917) 902-3869
nds@davidbsmithpllc.com

Counsel to Felipe Martinez

Certificate of Service

I hereby certify that on the 26th day of August, 2021, I filed the foregoing motion with the Clerk of Court using the CM/ECF system which will notify counsel of record.

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
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[PROPOSED] ORDER

Before the Court is Defendant Felipe Antonio Martinez’s motion to travel from Travis County, Texas to Riverside County, California, where his family resides. The government does not oppose Mr. Martinez’s motion. For the reasons set forth in the motion, it is

ORDERED, that the motion is **GRANTED**, and it is further

ORDERED, that Mr. Martinez may travel from Travis County, Texas to Riverside County, California.

IT IS SO ORDERED.

Date: August __, 2021

ROYCE C. LAMBERTH
UNITED STATES DISTRICT JUDGE