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Attorney for Defendant, RUSSELL TAYLOR

UNITED STATES DISTRICT COURT

DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

RUSSELL TAYLOR,
DEFENDANT

CASE NO. 1:21:CR:392-RCL

**DEFENDANTS UNOPPOSED MOTION
TO MODIFY BAIL TERMS AND
CONDITIONS**

JUDGE: ROYCE C. LAMBERTH

Defendant Russell Taylor, through his counsel, files this unopposed motion to modify his terms and conditions as it relates to leaving the Central District of California. Mr. Taylor requests the following modification to his terms and conditions of pretrial release.

1. That Mr. Taylor be permitted to travel to the Southern District of California, the district border being close to his home and his work requiring frequent trips there.
2. With the prior approval of his Pre Trial-Services Officer, that Mr. Taylor be permitted to leave the Central District of California to travel to the State of Utah, with incidental travel permitted via the State of Nevada and the State of Arizona.
3. That Mr. Taylor shall report any Pre Trial-Services approved travel (other than to the Southern District of California) to the United States Attorney's Office (via the

Government counsel of record), through his counsel of record, by email, a minimum of 48 hours prior to his leaving the Central District of California.

4. That the previously imposed Curfew is removed.

Travel to any other State or District shall continue to require specific Court Approval. Mr. Taylor shall continue to be allowed to travel to Washington D.C. for legal purposes or Court appearances pursuant to the current terms and conditions.

The Court has granted requests for travel to Utah on five previous occasions, without incident. Relevant orders at Dkt Nos. 65, 85, 104, 130, and 149. The Government has been presented with the request of Mr. Taylor to change his conditions to streamline future requests to travel and does not oppose this request.

Respectfully Submitted,



Dyke Huish

Attorney for Russell Taylor