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

10 UNITED STATE OF AMERICA,

11 Plaintiff,

12 vs.

13 RONALD MELE,

14 Defendant

Case No.: 1:21-cr-00392 -RCL-6

**DEFENDANT MELE’S MOTION TO BE
EXCUSED FROM ATTENDING PRE-
TRIAL HEARINGS IN PERSON IN
WASHINGTON DC AND FOR
PERMISSION TO APPEAR BY ZOOM**

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16 **DEFENDANT MELE’S MOTION TO BE EXCUSED FROM ATTENDING PRE-TRIAL**
17 **HEARINGS IN PERSON IN WASHINGTON DC AND FOR PERMISSION TO APPEAR**
18 **BY ZOOM**

19 TO THE HONORABLE ROYCE LAMBERTH, U.S. DISTRICT JUDGE FOR THE
20 DISTRICT OF COLUMBIA:

21 Mr. Ronald Mele, through his attorney, Steven C. Bailey, respectfully requests that this
22 Honorable Court excuse defendant from attending the pre-trial hearings currently scheduled for
23 April 26, 2023, and June 16, 2023, in the District Court in Washington DC. In support of the
24 motion, Mr. Mele shows as follows:
25

- 26 1. Defendant has appeared as required by this Court by Zoom in all other
27 appearances.
28 2. Defendant has appeared as and when requested by his pre-trial services officer

1 and has complied with all requirements of pretrial release.

2 3. Mr. Mele has exhausted the funds he has allocated and saved for this case.

3 Moreover, he has recently filed a motion to have counsel appointed.

4 4. Trial is currently set for 10 day beginning July 6, 2023 and defendant needs to
5 save funds to pay for the extraordinary cost associated with being present for trial in July.

6 5. Defendant is represented in this case by Steven C. Bailey and his counsel will be
7 present in court to represent defendants' interests during hearings on trial scheduling, jury
8 questionnaire and pre-trial and in-limine motions.

9 6. Defendant Mele will be present by Zoom if the grants permission and will
10 maintain contact with his attorney both before and during the hearing by telephone.

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14 Respectfully submitted,

15 Dated: March 1, 2023

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18 By: /s/ Steven C. Bailey
19 Steven C. Bailey
20 Attorney for the Defendant
21 RONALD MELE

22 **CERTIFICATE OF SERVICE**

23 I, Steven C. Bailey, hereby certify that on March 1, 2023, I caused a copy of this Motion
24 to be Excused from attending Pre-Trial Hearings in Person in Washington DC and for
25 Permission to Appear by Zoom to be delivered to the parties of record by filing it electronically.

26
27 /s/ Steven C. Bailey
28 Steven C. Bailey