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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. With the **prior approval** of his Pre Trial-Services Officer, Mr. Taylor will be permitted to leave the Central District of California to travel for purpose of work to any District within the United States except the District of Columbia. This approval can come from either his Pre-Trial Officer in California, where he resides, or Pre-Trial Officer in the District of Columbia.
2. Mr. Taylor shall continue to be allowed to travel to travel to the District of Columbia for legal purposes or Court appearances pursuant to the current terms and conditions.

The Court has granted requests for travel out of the Central District of California on multiple 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.

July 23, 2023

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Dyke Huish". The signature is stylized with a large initial "D" and "H".

Dyke Huish

Attorney for Russell Taylor