

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-46-RDM
	:	
PATRICK MONTGOMERY,	:	
	:	
Defendant.	:	

**UNOPPOSED MOTION TO ADJUST THE STATUS OF
MR. MONTGOMERY'S CURFEW ON WEDNESDAY EVENINGS**

This Firm is counsel to defendant Patrick Montgomery and hereby submits this unopposed motion respectfully asking the Court to reconsider the conditions of his pre-trial release to adjust his nightly curfew on Wednesday evenings to 10:00 p.m. from 8:00 p.m. so that he may attend weekly men's group therapy counseling session. We have conferred with the government, which does not oppose this request, as well as Mr. Montgomery's probation officer, who also does not oppose this request.

As the Court is aware, Mr. Montgomery is currently permitted to leave his home, while still being monitored by an ankle bracelet, for the purpose of employment, but he is subject to a nightly 8:00 p.m. curfew. Mr. Montgomery has begun attending meetings at a men's counseling group, and the meetings end at approximately 7:30. Given the distance from the meetings to Mr. Montgomery's home, he is not able to make it home in time to satisfy the curfew and complete the meetings.

Seth Junker, Mr. Montgomery's probation officer, notes that Mr. Montgomery has remained compliant with his conditions of release. We respectfully submit that Mr. Montgomery's

participation in this ongoing Wednesday men's counseling group serves the interests of justice.

Mr. Montgomery's curfew will remain at 8:00 p.m. the other days of the week.

The Court's consideration of this request is greatly appreciated.

Respectfully submitted,

/s Duncan Levin
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