

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
(Filed Electronically)**

_____	)	
	)	
<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	<b>Criminal Action No. 21-CR-178 (APM)</b>
	)	
<b>SHELLY STALLINGS, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	
_____	)	

**MOTION FOR RELEASE PENDING SENTENCING**

Comes the defendant, Shelly Stallings, by counsel, and moves the Court pursuant to 18 U.S.C. §3145(c) to release her pending sentencing herein following her anticipated change of plea on August 12, 2022.

Defendant has been totally compliant with the conditions of her release with no violations whatsoever and has been reporting to her supervising probation officer as directed, timely submitting to all requested drug tests, and attending required mental health and drug abuse evaluations. She is employed in Henderson, Kentucky, as a forklift driver, from 3:00 pm to 11:00 pm. She is engaged in ongoing treatment for recurrent breast cancer, including radiation therapy, an upper GI evaluation and a lower GI evaluation on March 2, 2022, and April 20, 2022; a bone scan On March 4, 2022; and a PET scan on April 20, 2022. She will not be able to retain access to her doctors and current treatment regimens if incarcerated pending sentencing, especially if incarcerated

in the Washington, D.C. area. Also, her incarceration in the Washington, D.C. area will adversely impact the ability of her counsel to properly prepare for sentencing.

/s/ Scott T. Wendelsdorf (Ky. Bar. No. 75790)  
Federal Defender  
629 Fourth Avenue  
200 Theatre Building  
Louisville, Kentucky 40202  
(502) 584-0525  
Scott\_Wendelsdorf@fd.org

Counsel for Defendant.

#### **CERTIFICATE**

I hereby certify that on August 10, 2022, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Scott T. Wendelsdorf