

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO.: 21-cr-342 PLF

JERAMIAH CAPLINGER,

Defendant.

_____ /

DEFENDANT'S UNOPPOSED MOTION
TO CANCEL APPELLATE BOND

Defendant moves this Court to enter an order cancelling his appellate bond. In support of his request Defendant states that:

1. Defendant Caplinger was sentenced to 35 days in custody followed by 2 years of probation.
2. He filed a timely notice of appeal
3. On September 2, 2022, this Court granted Defendant Caplinger bond pending appeal.
4. Defendant Caplinger's appeal is still pending.
5. Due to his personal circumstances, Defendant Caplinger feels it is in his best interest to serve his 35 days of imprisonment this winter, while his place of employment is willing to hold his job open for him.
6. He has made arrangements with his employer to work through mid-February.

7. He requests that his bond be cancelled and that he be ordered to report FCI Milan, his designated institution, on February 20, 2023.
8. The Assistant United States Attorney assigned to this case has been contacted and he has no opposition to Defendant's request.

Defendant requests that appellate bond be cancelled and that he be ordered to report to FCI Milan on February 20, 2023. Defendant reserves the right to request a delay in his reporting if his appeal is decided in his favor prior to February 20, 2023.

Submitted,

s/James R. Gerometta
Counsel for Jeramiah Caplinger
Federal Community Defender
613 Abbott Street, Suite 500
Detroit, Michigan 48226
Email: james_gerometta@fd.org
Phone: 313.967.5542

Dated: February 2, 2023

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO.: 21-cr-342 PLF

JERAMIAH CAPLINGER,

Defendant.

_____ /

BRIEF IN SUPPORT OF DEFENDANT'S
UNOPPOSED MOTION TO CANCEL APPELLATE BOND

For the reasons state in Defendant's brief and because the Government has no opposition, this Court should enter an order cancelling Defendant's appellate bond and directing him to report to the Bureau of Prisons at FCI Milan on February 20, 2023.

Submitted,

s/James R. Gerometta
Counsel for Jeramiah Caplinger
Federal Community Defender
613 Abbott Street, Suite 500
Detroit, Michigan 48226
Email: james_gerometta@fd.org
Phone: 313.967.5542

February 2, 2023