IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	§	
	§	
VS.	§	NO. 1:22-CR-00153-001-RCL
	§	
RAUL JARRIN	§	

MOTION TO CONVERT HEARING TO ZOOM HEARING

TO THE HONORABLE ROYCE C. LAMBERTH, UNITED STATES DISTRICT JUDGE FOR THE DISTRICT OF COLUMBIA:

Now comes RAUL JARRIN, by and through counsel, and moves this Honorable Court to change the in-person sentencing hearing to a ZOOM hearing in this case. In support of this motion, defendant would show as follows:

I.

Sentencing is scheduled for Friday, June 23, 2023.

II.

Counsel for defendant respectfully requests this Honorable Court to grant this motion to convert the in-person hearing to a ZOOM hearing for the following reasons:

Counsel for defendant requests a ZOOM hearing for Sentencing that is set on June 23, 2023, for the following reason. Defendant and counsel for Defendant, both reside in Houston, Texas. Counsel for defendant has a motion hearing set on June 22, 2023, in Houston, Harris County that would make it difficult to travel to Washington, D.C. on June 23, 2023. Instead of filing a motion to continue to a

later date, counsel and Defendant are requesting to change to a ZOOM hearing. The defendant is on bond and consents to this motion. Additionally, Defendant has signed and filed a waiver. Defendant is fully compliant with all of his conditions of release.

Counsel for defendant has conferred with the Government who are unopposed to the motion.

III.

This motion is not made for the purpose of delay, but that justice may be done. For all the foregoing reasons, counsel for defendant requests that Sentencing be changed to a ZOOM hearing in this case.

SCHAFFER KENNEDY JOHNSON & MAYS

By: /s/ Kent A. Schaffer

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Attorneys for Defendant, RAUL JARRIN

CERTIFICATE OF CONFERENCE

Counsel for defendant conferred with AUSA Brittany Reed concerning her position on Defendant's Motion to Convert Hearing to a ZOOM Hearing. Ms. Reed advised that she has no opposition to this motion.

/s/ Kent A. Schaffer
Kent A. Schaffer

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to all parties.

/s/ Kent A. Schaffer
Kent A. Schaffer