

NOW comes Defendant Benjamin Robinson by and through his undersigned counsel of record William L. Shipley, and respectfully requests that this Honorable Court modify his conditions of release to move his place of residence from the Southern District of North Carolina to the District of South Carolina and transfer his supervision to the District of South Carolina.

Earlier this month, Defendant Robinson purchased a house in Lancaster South Carolina for he, his wife, and two children ages three and one. Prior to making the purchase, Defendant Robinson alerted North Carolina Pretrial Services of the possible move. At that time Pretrial Services posed no objection to Defendant Robinson's relocation.

As of March 23, 2023, Defendant Robinson is being informed by North Carolina Pretrial Services that he is not allowed to move. This has now come after Defendant Robinson has closed on a home in South Carolina and his lease at his house in North Carolina has lapsed.

Defendant Robinson has only been charged with misdemeanors in the above cite case and is set to enter into a plea agreement at the beginning of April, 2023.

CONCLUSION

For the foregoing reasons, Defendant Robinson respectfully requests this Honorable Court to modify his conditions of pretrial release and allow him to move his place of residence from the Southern District of North Carolina to the District of South Carolina and transfer his supervision to the District of South Carolina.

Dated: March 23, 2023

Respectfully Submitted,

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