

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

LANDON BRYCE MITCHELL,

Defendant.

Crim. Action No. 1:21CR508(BAH)

**MR. MITCHELL'S MOTION FOR PERMISSION TO GO OUTSIDE FOR 20
MINUTES PER DAY FOR FRESH AIR AND TO WALK THE DOG**

Landon Mitchell, through counsel, respectfully moves this Court for an Order permitting him to go outside for twenty minutes to walk his brother's dog. Mr. Mitchell is living with his brother under strict terms of home incarceration. Since the Court imposed home incarceration on January 27, 2023, he has not been outside the house. Sentencing in this matter was recently continued from March 2, 2023, to April 20, 2023. In light of the extended period of time for which Mr. Mitchell will be under terms of home incarceration, he now moves for a minor adjustment in his condition so that he may walk around the block for twenty minutes each day at a time approved by pre-trial services. In support of this Motion, counsel state:

1. Mr. Mitchell is before the Court having accepted responsibility to, *inter alia*, obstruction of justice. The sentencing in this matter is scheduled on April 20, 2023.
2. On January 27, 2023, the Court ordered the defendant to reside at his brother's house under "24-hour-a-day lock-down except for medical emergencies and

court appearances and other activities specifically approved by the Court.”

Minute Order, 1/27/2023. Mr. Mitchell is also on GPS monitoring.

3. Mr. Mitchell has been compliant with the terms of home incarceration.
4. On February 28, 2023, the Court continued the sentencing hearing in this matter to April 2023. Minute Order, 2/28/2023.
5. Mr. Mitchell has not been outside since January 27, 2023. The lack of fresh air and physical activity is taking a toll on his mental and physical health. Mr. Mitchell moves the Court for permission to go outside for twenty minutes per day, at a time approved by Pre-Trial Services, so that he can get some physical activity and walk his brother’s dog around the block.
6. The government defers to the Court as to this request.

Respectfully Submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

ELIZABETH MULLIN
DIANE SHREWSBURY
Assistant Federal Public Defender
625 Indiana Avenue, N.W., Suite 550
Washington, D.C. 20004
(202) 208-7500