IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION

UNITED STATES OF AMERICA *

v. * **Criminal Case No. DLB23-376**

TERRY CHEN, *

*

CONSENT MOTION FOR MODIFICATION OF CONDITIONS OF PRE-TRIAL RELEASE

COMES NOW, the Defendant, Terry Chen, by and through his undersigned counsel, Marc G. Hall, Esquire requesting this Court Grant a modification of the conditions of pre-trial release and allow him to travel to New Jersey with his family for Christmas and for reasons states the following:

1. The Defendant currently is released to the supervision of pre-trial services with home detention.

2. Currently Mr. Chen is in compliance with all the requirements of pre-trial services and with no violations of his pretrial release.

3. Mr. Chen lives with his family in the Oxon Hill area of Prince Georges County, Maryland.

4. Mr. Chen family will be travelling to Edison and to Bayview, New Jersey for Christmas to visit other family members leaving December 24, 2024, and returning December 29, 2024. From December 24, 2024, until December 29, 2024. His grandparents live in Bayview, and he has

cousins in Edison, NJ. Mr. Chen will remain in the District of New Jersey and reside at an address that has been provided to and approved by U.S. Pretrial Services.

5. Counsel spoke to the Assistant United States Attorney, Harry Gruber, who is assigned to this case, and he consents to this motion. The Defendant's Pre-Trial Officer Pamela Nieva has indicated he has no objection to his travel plans.

WHEREFORE, for these reasons the Defendant, Mr. Chen requests that the Court allow him to travel to Edison and to Bayview, New Jersey with his family for Christmas leaving on December 24 and returning on December 29, 2024.

Respectfully submitted,

Law Office of Marc G. Hall, P.C.

/S/

Marc G. Hall, Esquire (#01386)
6411 Ivy Lane
Suite 150
Greenbelt, MD 20770
240 205-3041
Attorney for the Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of December 2024, a copy of the foregoing document was electronically transmitted through ecf to the United States Attorney's Office, Greenbelt, Baltimore, Maryland 21201.

/S/
Marc G. Hall, Esquire (#01386)