IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
v.	*	Case No.: RDB-23-27
KEVIN DAVIS	*	

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CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

Kevin Davis, through his attorney, C. Justin Brown, Brown Law, respectfully moves this Court to modify the terms of his release to permit Davis to attend his daughter's pre-prom sendoff on April 22, 2023. In support of his request, Davis states as follows:

1. On January 6, 2023, this Court ordered Davis's pretrial release on his personal recognizance.

2. Davis now seeks a modification of this Court's order, specifically Condition Number 8(s), which prohibits him from leaving his residence except for employment, medical necessities, attorney visits, court appearances, or other activities approved by the Court or pretrial services. Davis requests that this provision be modified to allow him to travel to Randallstown, Maryland, to attend his daughter's pre-prom sendoff.

3. The sendoff will take place on April 22, 2023, from 5pm-7pm. It will be held at Khadine Maragh's house at 9127 Sunset Ridge Road in Randallstown, Maryland. Maragh is the mother of Davis's daughter, Azoria Davis. Maragh and Davis have shared

custody of Azoria.

4. Azoria is 17 years old and a senior at Windsor Mill Academy. Prom is a pivotal event in any teenage girl's life and Davis, being an involved father, wants to be there to support his daughter. The purpose of the event is to take pictures and celebrate this momentous occasion in Azoria's life.

5. Davis respectfully moves this Court to modify the terms of his release to permit him to attend this event from 5pm-7pm, with an additional 30 minutes before and after the event to allow for travel time.

6. Tamika Glenn, Davis's codefendant in this case, will not be in attendance.

7. Davis's Pre-Trial Officer, Nick Luoco, does not object to this request.

8. Assistant United States Attorney Paul Riley does not object to this request.

WHEREFORE, for the reasons set forth above, Davis respectfully requests that this Court modify the conditions of his pretrial release to permit him to attend his daughter's pre-prom sendoff on April 22, 2023, subject to monitoring by U.S. Pretrial and Probation Services.

Respectfully Submitted,

_____/s/_____

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2023, a copy of this Motion was served on all parties via CM/ECF.

_____/s/_____
C. Justin Brown