IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
v.	*	**Criminal Case No. RDB-23-0027**
TOMEKA GLENN	*	

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CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant, Tomeka Glenn ("Ms. Glenn"), by and through his attorney, Christopher C. Nieto, and moves this Court to modify the conditions of release ordered in Ms. Glenn's pending matter, with the consent of all parties, and in support thereof states as follows:

1. On January 6, 2023, Ms. Glenn appeared in federal court for her initial appearance. The Government was not seeking detention, and conditions of release were fashioned. One of the conditions, specifically, imposed on Ms. Glenn was that she was subject to electronic home monitoring and not allowed to leave her home unless authorized to do so.

2. On August 18, 2023, after seven months of compliance with her pre-trial release conditions, Ms. Glenn's supervision was adjusted to allow her to submit to a curfew of 9:00pm to 8:30am in lieu of electronic home monitoring. Her adjustment to this new level of supervision has been satisfactory: she has had no issues with her supervising officer and has complied with all the conditions of her release.

3. With the Thanksgiving holiday this week, Ms. Glenn respectfully requests permission of the Court to extend her curfew until 11:00pm on Thursday night only. She plans to visit various family members for the holiday and, based on travel time and her desire to spend as much time with them as she can, she anticipates requiring an extra two hours outside her home for the holiday.

4. Undersigned counsel has spoken with both Assistant United States Attorney Paul Riley and United States Probation Officer Vicky Adams about this request. Neither party objects to this request.

WHEREFORE, Ms. Glenn respectfully requests that the Court grant this motion and enter the attached Amended Order.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2023, a copy of Defendant's Consent Motion to Modify, which was electronically filed in this case, was emailed to Paul Riley and Vicky Adams.

/s/

Christopher C. Nieto, #30031
Attorney for Ms. Glenn