IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA, *

Plaintiff, *

Criminal No. 8:23-cr-00210-RDB

v. *

DAVID EPSTEIN *

Defendant. *

* * * * * * * * * * * * * * *

MOTION TO AMEND THE ORDER SETTING CONDITIONS OF RELEASE (CONSENT)

Defendant David Epstein ("Epstein") by and through undersigned counsel hereby requests permission of this Court to Amend the Order Setting Conditions of Release, and in support states:

1. By Order of this Court on August 3, 2023, Epstein is not to enter into any financial transactions exceeding $2,000 without prior approval from Pretrial Services, with the exception of mortgage payments, legal fees and litigation costs. ECF 10.

2. During one of the recent storms, a tree fell on Mr. Epstein's vehicle and caused sufficient damage to the vehicle that the insurance company deemed the vehicle a total loss (see Exhibit 1).

3. As a result of the damage, Epstein is forced to either purchase or lease a replacement vehicle. To replace the vehicle, a purchase would require Epstein to borrow a maximum of $10,000 to supplement the amount of money the insurance company has agreed to pay for the damage to the vehicle. Therefore, Epstein is hereby requesting permission to amend the Order Setting Conditions of Release to allow Epstein, if necessary, to borrow an amount not exceeding $10,000, to supplement the insurance proceeds in connection with the purchase of a replacement vehicle or, in the alterative, authorizing Epstein to lease a vehicle.

4. Both Paul Riley, Assistant U.S. Attorney and Ken Langston of Pretrial Services have agreed to Epstein's alternate requests (Exhibit 2).

WHEREFORE, Defendant David Epstein requests approval of this Court to amend the ORDER SETTING CONDITIONS of RELEASE to allow Epstein, if necessary, to borrow an amount, not exceeding $10,000, to supplement the insurance proceeds in connection with the purchase of a replacement vehicle or in the alterative authorizing Epstein to lease a vehicle.

Dated: September 13, 2023

Respectfully submitted,

/s/ Robert B. Schulman, Esq.

Robert B. Schulman, Fed. Bar No. 00068
RBS@shg-legal.com
Richard Bardos, Fed Bar No. 01559
rbardos@shg-legal.com
Schulman, Hershfield & Gilden, P.A.
One East Pratt Street, Suite 904
Baltimore, Maryland 21202
Tel: (410) 332-0850
Fax: (410) 332-0866

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of September, 2023, the foregoing Pretrial Motion was filed and served, using the ECF filing system, upon:

Paul Riley, Esquire
Assistant United States Attorney
36 S. Charles Street
Baltimore, MD 20201

/s/ Robert B. Schulman, Esq.