

UNITED STATES DISTRICT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:21-cr-00292-RCL-1
	)	
CHRISTOPHER WORRELL,	)	
	)	
Defendant.	)	

**EMERGENCY MOTION FOR RECONSIDERATION**

Defendant Christopher Worrell, by and through his counsel, tenders this Emergency Motion for Reconsideration of Order of Detention/Reopening Detention Hearing Due to Changed Circumstances pursuant to 18 U.S.C. § 3142(f)(2) and Federal Rule of Civil Procedure Rule 59(e), which permits a judicial officer to reopen the issue of detention at any time if information exists which was unknown to the movant at the time of the hearing and which has a material bearing on the issue of whether there are conditions of release that will reasonably assure the appearance of the defendant and the safety of the community. A memorandum of support and declaration with accompanying exhibits are being submitted simultaneously with this motion, and a proposed order granting the relief requested is also tendered.

Date: May 11, 2021

Respectfully Submitted,



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*Attorney for Defendant Christopher Worrell*

**CERTIFICATE OF SERVICE**

I, John M. Pierce, hereby certify that on this day, May 11, 2021, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

                    /s/ John M. Pierce                      
John M. Pierce