

5. Upon information and belief, this Court previously permitted Lee to appear by video conferencing at the U.S. District Court for the Western District of Michigan in Grand Rapids on a matter relating to her selection of counsel.
6. Lee lives approximately 20 minutes from the federal courthouse in Grand Rapids.
7. Lee agrees to be in the courthouse in Grand Rapids within 20 minutes of receiving notice that there is a verdict.
8. Lee defers to counsel on all matters relating to questions by the jury and will nonetheless remain available at all times for consultation with counsel.
9. Lee's oldest son will graduate high school on May 23, 2019, and she would normally participate in the events leading up to this milestone.
10. Lee's youngest son is 10 and is enduring the stress of her continued absence.
11. The Government has indicated its opposition to the instant motion.
12. Lee is amenable to any solutions the Court may entertain.

WHEREFORE, this Honorable Court is respectfully urged to grant the relief requested.

Respectfully submitted,



Peter Charles Horstmann, Esq.
BBO #556377
450 Lexington Street, Suite 450
Newton, Massachusetts 02466
(617) 723-1980

Attorney for Defendant Sunrise Lee

CERTIFICATE OF SERVICE

I, Peter Charles Horstmann, certify that I have caused a copy of this Memorandum to be served through the ECF system on AUSAs Nathaniel Yeager, David Lazaras and Fred Wyshack, United States Attorneys Office, One Courthouse Way, Boston, MA 02210, on April 24, 2019.

A handwritten signature in blue ink, appearing to read "P. C. Horstmann", is centered on the page.

Peter Charles Horstmann, Esquire