

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	No.: 16-cr-10305-NMG
)	
MARTIN GOTTESFELD)	

MOTION FOR RELEASE FROM CUSTODY

The defendant Martin Gottesfeld (“Mr. Gottesfeld”) moves this Honorable Court for release from custody pursuant to 18 U.S.C. §3142. As grounds, today Mr. Gottesfeld, through counsel, filed a Motion to Dismiss (D-146) likely to prevail on the merits. Mr. Gottesfeld has been held in custody for over twenty-four (24) months. While a decision on the Motion to Dismiss is pending, Mr. Gottesfeld is willing to accept any and all appropriate conditions of release set by the Court. We respectfully request a hearing on this motion at the Court’s earliest convenience.

Respectfully submitted,
MARTIN GOTTESFELD
By his attorney:

/s/ David J. Grimaldi

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DATE: April 20, 2018

CERTIFICATE OF SERVICE

I, David J. Grimaldi, hereby certify that true copies of this motion were served on all registered participants in this matter via ECF this 20th day of April 2018.

/s/ David J. Grimaldi

David J. Grimaldi