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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

-----X
UNITED STATES OF AMERICA,

v.

Criminal No.: 19-cr-877-CCC

JOSEPH FRANK ABEL.,

Defendant.

Notice of Motion to
Reconsider
Pretrial Detention
and Order Immediate Release

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To:

Via Email

The Honorable Michael A. Hammer, U.S.M.J.
District Court of New Jersey
M.L. King Jr. Bldg. & Courthouse
50 Walnut Street
Newark, New Jersey 07101

Via Email

AUSA Jamie Lynn Hoxie
United States Attorney's Office
970 Broad Street, Room 700
Newark, New Jersey 07102

PLEASE TAKE NOTICE that on a time and date to be set by the Court, if necessary, Counsel for the Defendant, Joseph Abel, shall move before the District Court of New Jersey, the Honorable Michael A. Hammer, presiding for an order for reconsideration of pretrial detention and an order immediate release of defendant.

IN SUPPORT OF SAID MOTIONS, the Defendant will rely upon the attached Certification of Counsel.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Dated: March 26, 2020

Respectfully submitted,

/s/ Jason LeBoeuf

Jason J. LeBoeuf, Esq.