

AUG - 9 2004

ROBERT H. SHEMPELL, CLERK  
BY \_\_\_\_\_  
DEPUTY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAKE CHARLES DIVISION

UNITED STATES OF AMERICA	CASE NUMBER: 03-20092-01
VERSUS	JUDGE MELANCON
GREGORY JAMES CATON	MAGISTRATE JUDGE HILL

\*\*\*\*\*

**MOTION FOR TEMPORARY MODIFICATION OF BAIL RESTRICTIONS**

NOW BEFORE THE COURT, comes the defendant, Gregory James Caton, who requests that his bail restrictions be modified for the following reasons:

1.

Defendant sold his business to William Woodward prior to his release from custody.

2.

The International Baking Industry Exposition is being held in Las Vegas, Nevada from August 13, 2004 through August 19, 2004 and defendant's expertise is requested by the new owner.

3.

Defendant feels a moral obligation to attempt to accomplish the request.

4.

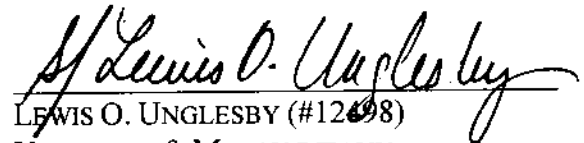
Defendant's counsel has attempted to contact both the probation officer and the government and has been advised they are out of town all week.

5.

Defendant's presentence is complete, objection filed, and sentencing set for August 24, 2004.

WHEREFORE, defendant, Gregory James Caton requests that his bail restrictions be modified to allow his travel to Las Vegas, Nevada, from August 13, 2004 through August 19, 2004, and that this motion be filed and request expedited consideration.

By Attorneys:



LEWIS O. UNGLESBY (#12698)

UNGLESBY & MARIONNEAUX

246 Napoleon Street

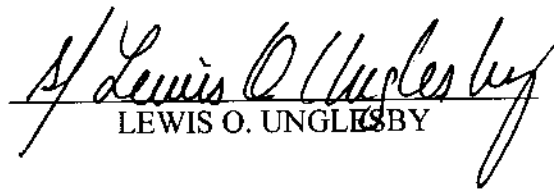
Baton Rouge, Louisiana 70802

Telephone: (225) 387-0120

Facsimile: (225) 336-4355

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been forwarded to all counsel of record via United States Mail, First Class postage prepaid and properly addressed or via Facsimile Transmission on this 5th day of August, 2004.



LEWIS O. UNGLESBY

*Order*

## UNGLESBY & MARIONNEAUX, LLC

*Trials and Appeals*

246 NAPOLEON STREET  
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†LEWIS O. UNGLESBY  
ROBERT M. MARIONNEAUX, JR.

PLEASE REPLY TO:  
BATON ROUGE

August 5, 2004

The Honorable Catherine B. Carter  
Deputy Clerk-in-Charge  
2100 John M. Shaw  
United States Courthouse  
800 Lafayette Street  
Lafayette, Louisiana 70801

RECEIVED

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ROBERT H. SHEMPELL, CLERK  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE, LOUISIANA

Re: USA v. Gregory J. Caton

Dear Ms. Carter:

Please find enclosed an original and one (1) copy of a Motion and Order for Temporary Modification of Bail Restrictions in the above encaptioned matter. I ask that you file the original and return one copy date stamped in the self-addressed stamped envelope.

Thanking you for your cooperation in this matter.

Sincerely,

*Lewis O. Unglesby*  
Lewis O. Unglesby  
*llw*

LOU/llw

Enclosures

cc: Honorable Tucker L. Melancon  
Larry Regan, Esquire  
Richard Moreno, Esquire  
Kenneth Michael Wright, Esquire  
Greg Caton