## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

V.

Case No. 19-CR-151

RICHARD D. GUYETTE,

Defendant.

## MOTION FOR FUNERAL RELEASE

Richard Guyette, by Kuchler & Cotton, S.C. Attorney Anthony D. Cotton, moves this Court, pursuant to 18 U.S.C. § 3142 to permit temporary release for his uncle's funeral. Mr. Guyette's uncle, Michael Dean Guyette, died unexpectedly at age 54 due to drowning on August 15, 2020. The funeral will occur on Friday, August 21, 2020 at Ryan Funeral Home, 305 N. 10th St., De Pere, Wisconsin. There is a private viewing for immediate family at 1:30pm and the public visitation will be held from 2pm -5pm. Michael Guyette was a father figure to the defendant, whose biological father committed suicide when Richard was approximately 7 years old. The defendant has a very small immediate family, which now consists of only his mother and her sister. Assistant United States Attorney William Roach does not object to this request, provided the release is supervised by law enforcement at Mr. Guyette's expense. Mr. Guyette would request that release occur on Friday, August 21, by 12:15pm or earlier to

allow for travel from the Manitowoc County Jail to De Pere, and end at approximately 6pm, to allow for return travel from De Pere to the jail.

Dated in Waukesha, Wisconsin this 19th day of August, 2020.

Respectfully submitted,

/s/ Anthony D. Cotton

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