

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
UNITED STATES OF AMERICA,)	
)	
v.)	Crim. No. 81-306 (PLF)
)	
JOHN W. HINCKLEY, JR.,)	
)	
Acquitee.)	
_____)	

**JOHN W. HINCKLEY, JR. AND ST. ELIZABETHS HOSPITAL’S JOINT MOTION
FOR INTERIM RELIEF PENDING HOSPITAL’S REQUEST
FOR ENLARGEMENT OF TERMS OF CONDITIONAL RELEASE**

John W. Hinckley, Jr. and St. Elizabeths Hospital (the “Hospital”) respectfully file this Joint Motion to ask this Court for an Order granting Mr. Hinckley interim relief pending the Hospital’s filing of its request for enlargement of the terms of Mr. Hinckley’s conditional release, which is expected to be completed in or about June. Specifically, Mr. Hinckley requests that this Court enter an interim Order permitting Mr. Hinckley additional Phase IV visits to his mother’s home under the same terms and conditions as this Court’s July 20, 2009 order, until such time as the Court issues a new order.

This Court’s July 20, 2009 Order granted Mr. Hinckley a total of twelve (12) visits to his mother’s home for a duration of nine nights. Mr. Hinckley has recently completed his twelfth visit, and therefore is unable to continue progressing with the therapeutic and transitional goals of the visits unless and until there is further relief from this Court. Like his prior conditional release visits, each and every one of Mr. Hinckley’s twelve visits under the July 20, 2009 Court Order were completed in full and faithful compliance with the Court’s order, without any manifestation of mental disease or danger to himself or others, as has been reported to this Court.

Consequently, the Hospital is preparing a petition to this Court to request that Mr. Hinckley be given additional time in the area of his mother's home toward the goal of fully transitioning Mr. Hinckley there. During the pendency of the preparation of the petition, Mr. Hinckley and the Hospital respectfully request that this Court enter an Order granting him interim relief of additional visits until such time as the Court enters a new order in order for Mr. Hinckley to maintain his therapeutic and transitional goals.

CONCLUSION

For the reasons set forth above, Mr. Hinckley and the Hospital request that the Court grant Mr. Hinckley additional interim conditional release visits, pending further order of this Court.

Dated: March 29, 2011

Respectfully submitted,

/s/ Barry Wm. Levine

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CERTIFICATE OF SERVICE

I hereby certify that, on March 29, 2011, I caused copies of the foregoing document to be served by electronic mail and first-class mail, postage prepaid, upon:

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/s/ Barry Wm. Levine
Barry Wm. Levine

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[PROPOSED] ORDER

THIS MATTER having come before this Court upon John W. Hinckley, Jr. and St. Elizabeths Hospital's Joint Motion For Interim Relief Pending Hospital's Request for Enlargement of Terms of Conditional Release, and the Court having reviewed the submissions of counsel and the record, it is hereby ORDERED, that the Joint Motion is GRANTED; and it is further

ORDERED, that the conditional releases shall continue until further order of this Court, and should in all other should continue to be governed by the same terms and conditions set forth in this Court's Order of July 20, 2009.

DONE AND ORDERED this _____ day of _____, 2011.

The Honorable Paul L. Friedman
United States District Judge

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