

E-FILED THURSTON COUNTY, WA SUPERIOR COURT 08/26/2021 4:02:52 PM Linda Myhre Enlow Thurston County Clerk

## IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON IN AND FOR THE COUNTY OF THURSTON

STATE OF WASHINGTON, Plaintiff,

Cause No. 21-1-00676-34

VS.

SELENA SMITH, Accused.

**DEFENSE MOTION** TO MODIFY CONDITIONS OF RELEASE

Selena Smith, through counsel, hereby urges the Court to modify his conditions of release to permit him to travel out of state to Oregon so that she may reside in her home State. As grounds he states the following:

- 1. Ms. Smith's current conditions of release prevent him from leaving the state of Washington.
- 2. Ms. Smith seeks the Court's authorization to modify this condition to permit her to leave Washington and travel to Oregon which is her home state.
- 3. Ms. Smith's government benefits are with the state of Oregon, including healthcare and food stamps.
- 4. Ms. Smith recently had a close friend die and wants to be present to support the family.
- 5. Should the Court agree and grant the modification, Ms. Smith is prepared to execute a waiver of extradition.

Respectfully submitted,

Attorney for Ms. Smith

DEFENSE MOTION TO MODIFY CONDITIONS OF RELEASE

THURSTON COUNTY PUBLIC DEFENSE 926 24TH Way SW Olympia, WA 98502 (360) 754-4897