U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
FILED

JUN 1 6 2004

ROBERT H. SHEMWELL, CLERK

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 new owner reflects a need for his expertise out of state in Las Vegas, Nevada, from July 11 through July 17, 2004. (See attached Exhibit 1)

3.

The defendant feels a moral obligation to attempt to accomplish the request of Mr. Woodward.

4.

The government's position on the matter is unknown.

WHEREFORE, defendant, Gregory James Caton requests that his bail restrictions be modified to allow his travel to Las Vegas, Nevada, from July 11 through July 17, 2004, and in accordance with the requests the probation office deems necessary.

By Attorneys:

Lewis O. Unglesby (#12498)

UNGLESBY & MARIONNEAUX

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Baton Rouge, Louisiana 70802

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(225) 387-0120

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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 _____ day of June, 2004.

LEWIS O. UNGLESBY

GLOBAL PRESERVATIVES , L.L.C. 1401 HODGES STREET P. O. BOX 3023 LAKE CHARLES, LA. 70602

337-491-0502 (OFFICE) 337-433-4291 (PLANT) 337-433-5253 (FAX.) 8, 2004

Honorable Tucker L. Melancon Judge, United States District Court 4700 John M. Shaw U.S. Courthouse 800 Lafayette Street Lafayette, Louisiana

Re: Gregory Caton

Dear Judge Melancon:

This company was formed in connection with the purchase of certain assets from Mr. Caton for the manufacturing of a food preservative. We employ Mr. Caton as a consultant in connection with a pending patent. It is our intent to attend a trade show known as the Institute of Food Technologists (www.ift.org) being held in Las Vegas from July 13 through July 16, 2004.

It is our hope that you consider modifying Mr. Caton's travel restrictions to allow him to assist us since he is the only person with any experience concerning trade shows. My partner, Tim Vaughan, would accompany him. It is my intent to attend at least some of the trade show if my schedule will permit. Mr. Ronald Helo has advised Mr. Caton that, if permitted to attend the show, he would be required to register with the Las Vegas Police Department. That being the case, the proposed itinerary is for Mr. Caton and Mr. Vaughan to fly to Las Vegas on July 11, 2004, register with the law enforcement office designated by Mr. Helo, set up the company's display on July 12, participate in the trade show and return to Lake Charles on July 17, 2044.

The decision to submit this request was made by me only after it became obvious that Mr. Caton cannot adequately train other employees to effectively present our product at this trade show. We have made a substantial investment which has been proven to be successful. If we can be successful at the trade show,



Honorable Tucker L. Melancon June 8, 2004 Page 2 of 2

it is entirely conceivable that we will be able to implement a major expansion and significant increase of the number of people we employ. Although I realize this is a major request, I do so in light of the opportunity presented, my confidence that Mr. Caton does not pose the risk of flight and that we have no option of obtaining the necessary expertise. Your consideration of this request is sincerely appreciated. Please do not hesitate to contact me should you wish additional information or to otherwise discuss the matter.

Sincerely,

William D. Woodward

RECEIVED

UNGLESBY & MARIONNEAUX, LLC

Trials and Appeals

Order

JUN 1 6 2004

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†LEWIS O. UNGLESBY ROBERT M. MARIONNEAUX, JR. PLEASE REPLY TO: BATON ROUGE

June 11, 2004

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

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

LOU/llw

Enclosures

cc:

Mr. Larry Regan

Mr. Richard Moreno