

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Criminal Number: 18-20315

v.

Hon. Judith E. Levy

Nathaniel Cotton,

Defendant.

**GOVERNMENT’S RESPONSE IN OPPOSITION TO DEFENDANT’S
MOTION FOR REVOCATION OF DETENTION ORDER AND MOTION
FOR COMPASSIONATE RELEASE**

In response to defendant’s motion for revocation of the detention order and motion for compassionate release, the government incorporates by reference the arguments stated in its response in opposition to Nathaniel Cotton’s *pro se* motions for bond. (R.87). Because Cotton’s counsel filed a motion for bond on Cotton’s behalf, the government’s motion to strike Cotton’s *pro se* motions (R. 83, 86) should be granted.

Cotton’s latest motion also states that he suffers from asthma, obesity and acid reflux disease. However, his medical records do not indicate a history of asthma or severed obesity (BMI \geq 40) making him a higher risk for contracting

Covid-19. *See* [CDC Website, People at Higher Risk](#). (R. 89: Sealed Medical Records).

Additionally, Cotton now requests “compassionate release”, however, since Cotton has not actually started serving a sentence through the Bureau of Prisons, compassionate release under 18 U.S.C. § 3582(c)(1)(A) is improper.

For these reasons and the reasons stated in the government’s response in opposition to Cotton’s *pro se* motions for bond, Cotton’s motion should be denied.

Respectfully Submitted,

Matthew Schneider
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/s/ Jihan M. Williams

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Certificate of Service

I certify that on June 12, 2020, I electronically filed the foregoing motion with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

Charles Longstreet, Counsel for Nathaniel Cotton

/s/ Jihan M. Williams
JIHAN M. WILLIAMS
Assistant United States Attorney
United States Attorney's Office