UNITED STATES DISTRICT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 21-cr-00035-EGS
IDDEDDY D. CADOL)	
JEFFREY P. SABOL,)	
Defendant.)	

MOTION FOR ADMISSION PRO HAC VICE OF WILLIAM L. SHIPLEY

Pursuant to Local Civil Rule 83.2(d), John M. Pierce, a member of the bar of this Court and counsel for Defendant Ronald Colton McAbee, hereby moves for the admission *pro hac vice* of William L. Shipley in the above-captioned case. In support of this motion, the undersigned states as follows:

- 1. I am a member in good standing of the Bar of this Court.
- 2. William L. Shipley is an attorney with Law Office of William L. Shipley & Associates, located at P.O. Box 745, Kailua, HI 96734. Mr. Shipley resides in Kailua, Hawaii where he practices remotely.
- 3. As set forth in the attached declaration, William L. Shipley is an active member in good standing of the state bar of Hawaii (9066).
- 4. William L. Shipley does not wish to be admitted generally, but for the purposes of this case only.

WHEREFORE, movant respectfully requests that the Court enter an order permitting William L. Shipley to appear *pro hac vice* in the above-captioned case.

Dated: March 4, 2022 /s/ John M. Pierce

John M. Pierce CA SBN: 250443 21550 Oxnaird Street 3d Floor, PMB#172 Woodland Hills, CA 91367 Tel: (213) 279-7846 jpierce@piercebainbridge.com

Attorneys for Defendant Ronald Colton McAbee,

CERTIFICATE OF SERVICE

I hereby certify that, on March 4, 2022, this motion and the accompany declaration was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce John M. Pierce