

**UNITED STATES DISTRICT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 21-cr-00292-RCL</b>
	)	
<b>CHRISTOPHER WORRELL, et. al.,</b>	)	
	)	
<b>Defendant</b>	)	
	)	

**DEFENDANT’S MOTION TO VACATE TRIAL DATE**

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*Attorney for Defendant*

NOW comes Defendant Christopher Worrell by and through his counsels of record, William L. Shipley, Esq., and Joe Allen, Esq. respectfully files this motion to vacate the currently set trial date.

Attorney Shipley is currently in the second Oath Keeper's trial which is expected to continue into the week of January 23, 2023, and with the anticipation of deliberations to extend into the week of January 30, 2023. Attorney Shipley is also set for trial in a civil matter in Hawaii Circuit Court, Paguriagan v. C&C Farmlands, on February 27, 2023, a matter first filed in 2016, and repeatedly continued as a result of COVID.

Attorney Allen already has several matters on his calendar for the week of February 13, 2023.

Attorney Shipley filed a notice of appearance into the above cited case on November 22, 2022. *See* EFC. No. 186. Attorney Shipley and Mr. Worrell understood that Mr. Shipley could enter the case only if the then-pending November 2022 trial date was continued based on Defendant Worrell's medical condition, a motion that was pending at the time. Only after that motion was granted by this Court, on November 15, 2022, did Mr. Shipley make an appearance and Attorney Alex Stavrou was asked by Defendant Worrell to withdraw.

The Final Pretrial Conference in the second United States v. Stuart Rhodes case before Judge Mehta took place on November 23, 2022, jury selection began on December 5, 2022, and opening statements took place on December 12, 2022.

Jurors were told that the case would last approximately six weeks, with a break for the holidays, and they should plan for the case to take the month of January, 2023.

Attorney Shipley was not advised in advance, nor was he aware immediately when it was filed, that the Government suggested a February 13, 2023, trial date in this case. That date was impossible on Attorney Shipley's calendar as he had a trial already set before Judge Cobb of this Court on February 6, 2023 – United States v. Muntzer. Attorney Shipley was under the impression that in granting the motion to vacate the trial date, a new trial date would not be set until Defendant Worrell's medical care providers determined that his health condition was stabilized or abated, as the Court ordered monthly reports be filed in order to track his treatment.

Mr. Shipley represents approximately 30 January 6 defendants charged in more than 25 different actions. After the Rhodes/Oathkeeper trial, he currently has a February 6, 2023 trial before Judge Cobb, noted above. Because the Rhodes/Oathkeeper case has lasted much longer than anticipated, a motion to continue the Muntzer trial date will be filed shortly.

Mr. Shipley has three trials set in February, March, and April the state and federal courts in Hawaii where he normally practices. Two are civil cases filed prior to the COVID pandemic which have each been continued numerous times but are now set on February 27, 2023 (Paguriagan v. C&C Farms, CV 15-1-1226 Hawaii Circuit Court – filed in 2015), and on March 28, 2023 (Graves v. S&G Labs Hawaii, 19-cv-310 (LEK) in federal court.

Mr. Shipley is also CJA appointed counsel in United States v. Miske, 19-cr-099, a multi-defendant RICO/homicide case in federal court in Hawaii. That case is set to start trial on April 17, 2023, with a four-month trial estimate.

Defendant Worrell made the determination to hire Attorney Shipley due to his over thirty (30) years of federal criminal trial experience. Due to Attorney Shipley's notice of appearance being filed, Attorney Stavrou filed a motion to withdraw on November 24, 2022. *See* EFC. No. 187. This Court granted Attorney Stavrou's withdraw on January 5, 2023 allowing Attorney Shipley to take over in his place. *See* Minute Order 1/4/2023.

Attorney Shipley has been in trial the entirety of the time since taking on the representation of Defendant Worrell, and has had no time to review any discovery or the facts of the case. As such, Attorney Shipley cannot be ready to provide effective representation of Defendant Worrell between the end of his current trial and the February 13, 2023, trial date suggested by the Government.

Undersigned will confer with government counsel regarding potential dates for trial and motions.

Dated: January 9, 2023

Respectfully submitted,

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