

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

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

**DEFENDANT'S MOTION RECONSIDER ORDER DENYING ATTORNEY JOE
ALLEN'S MOTION TO WITHDRAW**

William L. Shipley, Jr., Esq.
PO Box 745
Kailua, Hawaii 96734
Tel: (808) 228-1341
Email: 808Shipleylaw@gmail.com

Attorney for Defendant

NOW comes Defendant Christopher Worrell by and through his counsel of record, William L. Shipley, Esq., and respectfully files this motion asking the Court to reconsider its Order denying Attorney Joe Allen's motion to withdraw as counsel for Defendant Worrell.

On January 26, 2023, Attorney Joe Allen filed a motion to withdraw as counsel to Defendant Worrell. *See* EFC. No. 205. That motion was filed on the instruction of the undersigned, Attorney William Shipley, based on a request from Defendant Worrell that Attorney Allen file such a motion.

On January 31, 2023, this Court denied the motion expressing concern that if it were to allow Attorney Allen to withdraw, it could cause a delay of the trial currently set for March 13, 2023.

As previously expressed in Defendant Worrell's motion to vacate trial (EFC. No. 198) the purpose of Defendant Worrell hiring the undersigned counsel was for Attorney Shipley to be lead trial counsel. The undersigned counsel was an Assistant United States Attorney in both the Eastern District of California and the District of Hawaii for a combined period of more than 21 years, and has been a defense attorney in private practice for nearly 10 years, working almost exclusively in federal courts.

The undersigned counsel has already participated in two trials of defendants charged with crimes committed on January 6 – a bench trial before Judge McFadden in August-September 2022, and a jury trial before Judge Mehta in December-January 2022-23.

Attorney Shipley agreed to take over the defense of Defendant Worrell understanding that the trial date would likely be in the spring of 2023. He

raised the issue of the initial February 13, 2023, trial setting only because that date was not cleared with him by the Government before it was suggested to the Court, and that happened while he was in a two-month long trial before Judge Mehta.

But when the Court reset the matter for March 13, 2023, Attorney Shipley did not raise any issue with that date, and he fully expects to be prepared and ready for trial on that date – without needing the assistance of co-counsel. The undersigned took more than 40 cases to trial without the assistance of co-counsel during his more than two decades of service as a federal prosecutor, and tried both January 6 cases in this District without the assistance of co-counsel in either case.

WHEREFORE, Defendant Worrell respectfully requests this Honorable Court reconsider its order DENYING Attorney Allen’s motion to withdraw.

Dated: February 1, 2023

Respectfully submitted,

/s/ William L. Shipley
William L. Shipley, Jr., Esq.
PO BOX 745
Kailua, Hawaii 96734
Tel: (808) 228-1341
Email: 808Shipleylaw@gmail.com