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This still at 16:27:03 from Officer A.W.'s BWC video shows Clayton with his arm above his head looking directly at Justin Winchell in the bright blue coat who is pleading for someone to

help Ms. Boyland who is prostrate below him. Clayton was protecting his head from rioters who were using a hockey stick and an American flag to attack the police officers. Two other people were on the ground in need of help. This was the scene of suffering right in front of Clayton *ten seconds before* Officer A.W. was viciously attacked and slammed to the ground.

We are grateful that the Government presented evidence of Clayton's attempt to help Ms. Boyland. On page 23 of the Government's Sentencing Memorandum (ECF No. 408), in Exhibit 11C, you can see Clayton's distinctive Merrell hiking shoe just inches from Ms. Boyland who lies at the edge of the archway. It came off as Clayton wedged his feet under her to block others from trampling her. Please also refer to page 17 for Exhibit 8 where Clayton is at that precise location holding on for dear life to save Ms. Boyland. His actions depicted in Exhibits 9A, 9B and 9C where he clung to the side of the tunnel at the archway also show him vigorously maintaining his protective posture over Ms. Boyland.

We humbly ask this Court to consider these distressing events as mitigation for the mistake Clayton made in grabbing Officer A.W.'s leg.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of January, 2024, I electronically filed the foregoing Response with the Clerk of Court using the CM / ECF system, which will send an electronic notification of such filing to all counsel of record.

/s/
Pat Munroe Woodward, Esq.