

NOW COMES Defendant Damon Beckley, by and through his undersigned counsel of record William L. Shipley, and respectfully moves this Honorable Court to vacate his current sentencing date of January 4, 2024, and to set this matter for a status conference for purposes of rescheduling the sentencing hearing as well as supplementation of pending motions and a Defense Sentencing Statement.

On February 23, 2023, this Court found Defendant Beckley guilty on Counts 1 and 2 of the Superseding Indictment pursuant to a stipulated bench trial. *See* Minute Order dated 02/23/2023.

Defendant Beckley recently retained the undersigned counsel appear on his behalf for all remaining matters involving his case, including the Sentencing Hearing. As the Court is aware, since the stipulated bench trial Defendant Beckley has been representing himself with the assistance of standby counsel Gretchen Staft.

The undersigned counsel needs additional time to review the filings and transcripts of the proceedings before the Court in connection with the stipulated bench trial, as well as to review various motions filed by Defendant Beckley while serving as his own counsel. The undersigned counsel also needs additional time to review the Presentence Report and Recommendation filed by the Probation Officer with respect to Defendant Beckley. Based on a review of the docket, neither Defendant Beckley nor the Government have filed Sentencing Statements.

Wherefore, to provide the undersigned counsel sufficient time to prepare for the sentencing hearing, Defendant Beckley request this Honorable Court

continue the Sentencing Hearing and all filing deadlines related to sentencing by a period of 60 days.

Dated: December 26, 2023

Respectfully Submitted,

/s/ William L. Shipley
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