

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

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 21-cr-00035-EGS
)	
JEFFERY P. SABOL, et. al,)	
)	
Defendants.)	

**DEFENDANT RONALD MCABEE'S UNOPPOSED MOTION TO
MOVE TO TRIAL GROUP TWO**

NOW COMES Defendant, Ronald McAbee, by and through his counsel of record William L. Shipley, and moves this Court for an order transferring Defendant McAbee from the first trial group to the second trial group for purposes of trial in this matter.

Counsel for Defendant McAbee has communicated with the Government on this request, and the Government has no objection to the request.

On August 1, 2022, this Court entered a pretrial order separating the above cited case into two trials, the first beginning on November 30, 2022. Defendant McAbee was placed in the first trial group.

The pretrial order placed Defendant Michael Lopatic in the second trial group. Defendant Lopatic passed away on July 3, 2022.¹ This leaves the first trial group with five (5) defendants and the second trial group with three (3) defendants.

In addition, counsel for Defendant McAbee has a conflict with the scheduled trial date. Currently, counsel for Defendant McAbee is scheduled for a trial on November 29, 2022, in United States v. Rhodes, 22-cr-000150-APM. Counsel was retained by Defendant McAbee, and Defendant McAbee wishes to maintain continuity of the counsel of his choice, which will not be possible if Defendant McAbee remains in the first trial group.

For the foregoing reasons, Defendant McAbee requests that this Court amend its pretrial order by moving Defendant McAbee from the first trial group to the second trial group.

¹ https://lancasteronline.com/news/local/michael-lopatic-manheim-township-man-charged-in-jan-6-attack-dead-at-58-update/article_51821f1e-fcbd-11ec-a0e4-a7cef1b8ff53.html

Dated: August 8, 2022

Respectfully submitted,

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