

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

**UNITED STATES OF AMERICA**

**V.**

**ANTHONY SARGENT**

## Defendant

**Case No. 21-cr-00639-DLF**

**AMENDED STIPULATION TO CONTINUE JANUARY 13, 2023**  
**STATUS HEARING**

NOW COMES defendant Anthony Sargent, by and through his counsel of record, William L. Shipley, requests this Honorable Court to continue the status hearing set for January 13, 2023, to March 24, 2023.

During the November 10, 2022 status conference before this Court, the government informed counsel and the court a plea offer would be extended to Defendant Sargent.

A plea offer has been extended to the defendant. However, due to the short amount of time before the hearing, the defendant requires additional time to review additional discovery and the plea offer to be able to assess whether to accept the plea.

Moreover, Attorney Shipley began trial on December 5, 2022, in the second “Oath Keepers” case. See United States v. Rhodes, et al. 22-cr-00015-APM. Due to Attorney Shipley being in trial, there is not adequate time to review the plea offer with Defendant Sargent prior to the hearing currently scheduled for January 13, 2023.

Defendant Sargent agrees to exclude time pursuant to the Speedy Trial Act between January 13, 2023, and March 24, 2023, inclusive, in order to review additional discovery and to have sufficient time to confer with his counsel regarding the plea agreement in light of this discovery. Considering the reasonable time necessary for effective preparation by all parties taking into account the exercise of due diligence, the failure to grant such a continuance in this proceeding would be likely to make a continuation of the proceeding impossible, or result in a miscarriage of justice. Accordingly, the ends of justice served by granting such a request for a continuance outweigh the best interest of the public and the defendant in a speedy trial.

Wherefore, Defendant Sargent and the United States request this Honorable Court to continue the status hearing to March 24, 2023, and further request that the Court exclude the period from January 15, 2023, to March 24, 2023, inclusive, under the Speedy Trial Act.

Dated: January 12, 2023

Respectfully submitted,

/s/ William L. Shipley  
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