

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

UNITED STATES OF AMERICA)	
)	
)	
v.)	Case No. 21-cr-00738-BAH
)	
MICHAEL OLIVERAS)	
)	
)	
Defendant)	
)	

**DEFENDANT OLIVERAS' UNOPPOSED MOTION TO CONTINUE
SENTENCING**

NOW comes Defendant Michael Oliveras, by and through his counsel of record William L. Shipley Jr., and respectfully request this Honorable Court to continue the sentencing and all filing deadlines related thereto.

Counsel for Mr. Olivares has consulted with Counsel for the Government, Trial Attorney Ashley Akers, and the Government has no objection to the requested continuance.

On January 27, 2023, Mr. Oliveras entered a plea of guilty to a single count Superseding Information charging him with a violation of 18 U.S.C. 111(a). *See* ECF. No 59. This Court set sentencing of Mr. Oliveras' for April 21, 2023, at 10:00 am. *See* 01/27/2023 Minute Entry.

On April 12, 2023, following the Notice of Appearance by undersigned counsel, this Court granted an unopposed motion to continue sentencing until June 2, 2023, to afford undersigned counsel an opportunity to review the case file and consult further with Mr. Olivares. *See* 4/12/2023 Minute Order.

As this Court is aware, Attorney Shipley was counsel for different defendants in back-to-back "Oath Keeper" trials before Judge Mehta -- United States v. Stewart Rhodes, et. al., 22-cr-00015, and United States v. Crowl, et. al., 21-cr-00028. Following the conclusion of the Crowl trial, Mr. Shipley represented the defendant in United States v. Worrell, 21-cr-00292, a bench trial before Judge Lamberth that concluded on May 12, 2023.

Sentencing hearings related to the Oath Keepers in the Rhodes matter are set to begin May 24, 2024, with an "omnibus" hearing to address all common sentencing objections with regard to all nine defendants convicted in the Rhodes case, with the sentencing of Mr. Shipley's client Roberto Minuta set

to take place on June 1, 2023. Due to the number of defendants and the complexity of the cases – including having to address a 183 page Sentencing Statement filed by the Government -- Attorney Shipley has not been able to adequately meet and confer with Mr. Olivares for the purpose of preparing his Sentencing Statement and for the sentencing hearing set for June 2, 2023.

Based on discussions between counsel for the Government and Mr. Olivares regarding their respective schedules, the parties request that if the continuance is granted, sentencing in this matter be reset in late July, subject to the availability of time on the Court's calendar.

Wherefore, based on the foregoing, and without opposition from the Government, Defendant Oliveras requests this Honorable Court to continue his sentencing and all filing deadlines.

Dated: May 19, 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

Attorney for Defendant