



NOW comes Defendant Tyler Tew by and through his counsel of record, William L. Shipley, Esq., respectfully files this motion to vacate the currently set trial date and motion schedule.

On November 29, 2022, Defendant Tew filed a waiver of a trial by the district court judge. On December 8, 2022, the government filed a notice of no opposition. On December 12, 2022 District Court Judge Tanya S. Chutkan order the case referred to a magistrate judge. Later on, December 12, 2022, Magistrate Judge Robin M. Meriweather was assigned and ordered the parties to file a notice regarding the dates set by the Judge Chutkan. Defendant Tew files the following in response.

On January 3, 2023, undersigned confer with the government regarding Defendant Tew's position on the current schedule.

Attorney Shipley is currently in the second Oath Keeper's trial which is not set to conclude until the end of the January 2023. See United States v. Rhodes, et al. 22-cr-00015. Attorney Shipley is set for two separate trials in February and March-- United States v. Munzter, 21-cr-00105 is to begin February 6, 2023 and United States v. Bozell, 21-cr-00216 is set to begin March 20, 2023. Attorney Shipley is also set for trial in a civil matter in Hawaii Circuit Court, Paguriagan v. C&C Farmlands, on February 27, 2023, a matter first filed in 2016, and repeatedly continued as a result of COVID.

Due to Attorney Shipley's case load, newly provided discovery, and the extension of a plea offer, Defendant Tew wishes to vacate the current motions and trial schedule, and set a status conference for purposes of setting new

dates. Undersigned will confer with government counsel regarding potential dates for trial and motions.

Dated: January 4, 2023

Respectfully submitted,

/s/ William L. Shipley  
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