

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

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 23-cr-00330-TNM</b>
	)	
<b>JEREMY RODGERS.,</b>	)	
	)	
<b>Defendant</b>	)	
	)	

**DEFENDANT JEREMY RODGER'S MOTION FOR RECONSIDERATION OF  
MOTION TO CONTINUE ALL MATTERS**

William L. Shipley, Jr., Esq.  
PO Box 745  
Kailua, Hawaii 96734  
Tel: (808) 228-1341  
Email: 808Shipleylaw@gmail.com

*Attorney for Defendant*

COMES NOW Defendant Jeremy Rodgers, by and through his undersigned counsel of record William L. Shipley, and hereby respectfully makes this motion to reconsider this Court's order denying Defendant Rodger's Motion to Continue All Matters.

Since the date of the Pretrial Conference, two subsequent events have added to the justification for continuing this trial until after the upcoming inauguration of President-Elect Trump. As noted previously, the defendant continues to benefit from the presumption of innocence in this case. The question as to how this case proceeds forward involves the continued exercise of prosecutorial discretion by the Biden Justice Department. On December 1, 2024, President Biden issued a pardon of his son, Hunter Biden, who was pending sentencing based on criminal convictions in the District of Delaware and the Central District of California. Terminating those prosecutions prior to sentencing fatality undermines the Government's claim in this case as to the public's right to a speedy trial and prompt administration of justice. Thus, there is no actual harm to the Government from a delay of six to eight weeks to start the trial in this matter. There is, however, substantial harm to the defendant from having this case begin on December 10 as scheduled and potentially suffering one or more felony convictions.

The second development since the date of the Court's denial of the previously filed motion has been the expressed representation on December 8, 2024, by Present- Elect Trump of his intention to provide some form of relief to individuals such as Mr. Rodgers charged in connection with the events of January 6, 2021. During an interview on NMC New, President-Elect Trump

stated his unequivocal intention to act in this regard on day one of his administration, January 20, 2025. This is a materially different circumstance than when this motion was previously put before the Court. At that time, the circumstances were such that the only promises that had been made were various representations during the course of the campaign. Now, however, there has been an expressed statement of intention and planning that will be put into effect beginning on January 20, 2025. If this matter is continued until after that date it is almost a certainty that the exercise of prosecutorial discretion will result in the dismissal of this matter and Mr. Rodgers will not stand trial.

Dated: December 10, 2024

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'W. Shipley, Jr.', with a long horizontal line extending to the right.

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Kailua, Hawaii 96734  
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