

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

CASE NO.: 1:23-CR-00143

UNITED STATES OF AMERICA,

vs.

MICHAEL DANIELE,

Defendant.

\_\_\_\_\_/

**UNOPPOSED MOTION FOR CONTINUANCE OF  
STATUS CONFERENCE/CHANGE OF PLEA**

COMES NOW, the Defendant, MICHAEL DANIELE, by and through his undersigned counsel and pursuant to the Federal Rules of Criminal Procedure and file this his Motion for Continuance of Calendar Call and Trial. In support of this motion, MICHAEL DANIELE would state the following:

1. Said matter is set for a status conference/change of plea on July 18, 2023.
2. The defense requests, with the government's consent, an adjournment of these proceedings to September 21, 2023 for the purpose of finalizing the terms of a plea agreement between the government and the Defendant. The government and the Defendant has been engaged in fruitful and substantial plea negotiations that both sides are now confident will result in a plea agreement and change of plea. This adjournment is in the interest of justice in that it will allow the parties to reach an agreement that will spare the government and the Court from expending further scarce resources on the preparation for, and the conduct of, a trial in this matter.
3. The Defendant waives his right to speedy trial

4. Counsel has contacted AUSA Holly Grosshans and she does not object to said continuance of the status conference/change of plea.

5. The filing of this motion is made in good faith and not for the purpose of delay.

WHEREFORE, in the interest of justice, undersigned counsel would respectfully request this Honorable Court grant the Defendant, MICHEAL DANIELLE'S Motion for Continuance of the status conference/change of plea until September 21, 2023.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via CM/ECF and an electronic notification was sent to: [HOLLY.GROSSHANS@usdoj.gov](mailto:HOLLY.GROSSHANS@usdoj.gov), Holly Grosshans, AUSA, U.S. Attorney's Office for the District of Columbia, 601 D Street Northwest Washington, D.C. 20001 this 28<sup>th</sup> day of June, 2023.

Respectfully submitted,

**THE LAW OFFICES OF STUART N. KAPLAN, P.A.**  
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