

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 September 21, 2023.
2. The defense requests an adjournment of these proceedings to October 23, 2023, due to the fact that undersigned counsel is retained in a multi-defendant case, State v. Chait et al., pending in Broward County, Florida. A very critical deposition for my client's defense has been scheduled for September 21, 2023 at 10 a.m. This deposition is critical and has been extremely difficult to schedule to date. I am requesting a thirty (30) day adjournment.
3. The postponement will not have an impact on the Government or the plea agreement.
4. The parties request that the Court exclude the time from September 21, 2023, until October 23, 2023, pursuant to 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice

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served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A).

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

7. 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 October 23, 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, Holly Grosshans, AUSA, U.S. Attorney's Office for the District of Columbia, 601 D Street Northwest Washington, D.C. 20001 this 7th day of September, 2023.

Respectfully submitted,

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