

## Stuart Kaplan

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**From:** Stuart Kaplan  
**Sent:** Saturday, January 13, 2024 8:46 AM  
**To:** Martin, Sarah (USADC)  
**Cc:** Rosemary Bailey  
**Subject:** Re: USA v Michael Daniele

Good morning.  
We will note your objection.  
Thank you.  
Stuart  
**Stuart N. Kaplan, P.A.**

Sent from my iPhone

On Jan 13, 2024, at 8:37 AM, Martin, Sarah (USADC) <Sarah.Martin@usdoj.gov> wrote:

Good morning Stuart,

The government opposes the motion. Please let me know if you need anything additional.

Best,

Sarah

Sarah C. Martin  
Assistant United States Attorney  
U.S. Attorney's Office for the District of Columbia  
601 D Street NW  
Washington, D.C. 20001  
(202) 252-7048

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**From:** Stuart Kaplan <skaplan@stuartnkaplanpa.com>  
**Sent:** Friday, January 12, 2024 11:25 AM  
**To:** Martin, Sarah (USADC) <SMartin7@usa.doj.gov>  
**Cc:** Rosemary Bailey <rbailey@stuartnkaplanpa.com>  
**Subject:** [EXTERNAL] USA v Michael Daniele

Good morning, Sarah.  
Please find attached my Motion For Bill Of Particulars.  
Let me know if you opposed the filing of this Motion or in the alternative will provide the requested information.  
Thank you.  
Stuart

**EXHIBIT**  
"B"

Stuart N. Kaplan, Esq.  
Managing Partner



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