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SUPERIOR COURT  
OF THE  
DISTRICT OF COLUMBIA

U.S. DISTRICT COURT  
DISTRICT OF COLUMBIA  
CLERK OF COURT

2004 MAR 23 P 12:08

UNITED STATES OF AMERICA

FILED

v.

Criminal No.: M4113-03

Calendar 1: Judge Holeman

ELENA RUTH SASSOWER /

Trial Date: April 12, 2004

GOVERNMENT'S OPPOSITION TO DEFENDANT'S  
MOTION TO VACATE ORDERS OF JUDGE HOLEMAN AND TO CHANGE VENUE

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully opposes defendant's motion to vacate orders of Judge Holeman and to change venue. In support of its opposition, the United States relies on the following points and authorities, and such points and authorities as may be cited at a hearing on the motion:

1. Defendant has not demonstrated any specific bias or prejudice by Judge Holeman in this case necessitating that Judge Holeman's orders be vacated.

2. On August 20, 2003, Judge Abrecht denied defendant's motion for change of venue. No new facts have arisen since that date to warrant change of venue.

WHEREFORE, the United States respectfully requests that defendant's motion to vacate orders of Judge Holeman and to change venue be denied.

Respectfully submitted,

ROSCOE C. HOWARD, JR.  
United States Attorney

ANTHONY ASUNCION  
Assistant United States Attorney  
Chief, Misdemeanor Trial Section

By: Aaron Mendelsohn / SKL  
AARON MENDELSON  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing  
Opposition to Defendant's Motion to Continue Trial Date to May 3,  
2004, was served via facsimile and United States mail upon  
defendant, Elena Ruth Sassower, 16 Lake Street, Apartment 2D,  
White Plains, New York 10603, and attorney advisor Mark L.  
Goldstone, 9419 Spruce Tree Circle, Bethesda, Maryland 20814,  
this twenty-third day of March, 2004.

Ami K. Kim  
Assistant United States Attorney