

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

United States of America,
Plaintiff

v.

Thomas A. Shay,
Alfred W. Trenkler,
Defendants

Criminal No.: 92-10369-Z

MEMORANDUM IN SUPPORT OF BILL OF PARTICULARS

Any information requested in a Rule 7 motion which is necessary for a defendant to be "informed of the nature and cause of the accusations against him fully enough to enable him to prepare his defense" must be provided to him. Williams v. U.S., 164 F.2d 302, 304 (5th Cir. 1947).

In this case, by this motion, defendant seeks information which will prevent surprise at trial and enable him to prepare his defense with full knowledge of the charges against him.

For example, the indictment alleges a conspiracy to receive explosives and attempted malicious destruction of property during September and October, 1991. By this motion, defendant is merely asking the prosecution to particularize the dates, places and manner and means of said conspiracy so he may prepare his defense.

Respectfully submitted,
For the Defendant,
ALFRED W. TRENKLER
By his attorneys,

A handwritten signature in black ink that reads "Terry Philip Segal". The signature is written in a cursive style with a large, sweeping initial "T".

Terry Philip Segal
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Scott P. Lopez
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Dated:

January 19, 1993