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**Reply to Newark Office [X]**

ASSOCIATES

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March 20, 2020

**SENT VIA ECF**

Honorable Analisa Torres  
U.S. Southern District of NY  
500 Pearl Street  
New York, NY 10007

**Re: State of NY v Michael Thomas, et al.  
Docket No.: 1:19-cr-00830  
Request Extension to File Motion**

Dear Judge Torres:

As you are aware, our firm represents the Defendant, Michael Thomas, in the above-captioned matter. Pursuant to Your Honor's Order, our firm's motion to dismiss was due today, March 20, 2020, however, we are requesting a fourteen (14) day extension in which to file our motion. Needless to say, the current events with respect to the pandemic affecting the country, has drastically affected my staff's work hours, as well as my ability to complete this motion while still managing other issues associated with my business and my family.

In light of the foregoing, the Defendants, by and through the undersigned, respectfully requests a 14 day extension to file its motion to dismiss.

Respectfully submitted,

/s/ Montell Figgins

Montell Figgins, Esq.

*Attorney for Defendant Michael Thomas*

MF/sf