



The Law Offices of
MONTELL FIGGINS, LLC

17 Academy Street, Suite 305
Newark, New Jersey 07102
Phone: (973) 242-4700
Fax: (973) 242-4701
www.figginslaw.com

BRANCH OFFICES:

140 East Ridgewood Avenue
Paramus, NJ 07640

30 Wall Street 8th Floor
New York, NY 1005

Reply to Newark Office [X]

Of Counsel
Douglas Mitchell, Esq.
Linda Childs, Esq.

September 1, 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 To Appear Remotely**

Dear Hon. Judge Torres:

As you are aware, our firm represents the defendant, Michael Thomas, in the above-captioned matter. We are scheduled for a hearing on September 9, 2020. Given the current pandemic, I am not sure if the Court is allowing in-person hearings; however, I am requesting to appear remotely due to the circumstances surrounding COVID-19. Due to my health, I am unfortunately high risk and believe that it is in my best interest to appear remotely.

In light of the foregoing, I respectfully request the Court to allow my appearance via video or telephone.

Respectfully yours,

/s/ Montell Figgins

Montell Figgins, Esq.

Attorney for Defendant Michael Thomas

cc: Nicolas Roos, Esq., *Counsel for Plaintiff*
Rebekah Donaleski, Esq., *Counsel for Plaintiff*
Jessica Lonergan, Esq., *Counsel for Plaintiff*
Jason Erroy Foy, Esq., *Counsel for Defendant Noel*