



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 8<sup>th</sup> Floor  
New York, NY 1005

**Reply to Newark Office [X]**

ASSOCIATES

Kenneth E. Brown, Esq.  
Linda Childs, Esq.

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