



**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](http://www.figginslaw.com)

---

*BRANCH OFFICES:*

140 East Ridgewood Avenue  
Paramus, NJ 07640

30 Wall Street 8<sup>th</sup> Floor  
New York, NY 10005

**Reply to Newark Office [X]**

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

September 8, 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  
Adjournment Request**

Dear Hon. Judge Torres:

As you are aware, our firm represents Defendant, Michael Thomas, in the above-captioned matter. We are seeking an application for an adjournment of the January 4, 2021 trial date. Due to COVID-19 and my health concerns, combined with the fact that I need more time to complete my investigation, I am requesting that the Court adjourns the trial date to sometime in mid spring, preferably on or about May 3, 2021.

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*