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	NOTICE OF MOTION
	18-cr-602 (WHP)
	18-cr-850 (WHP)
X	

PLEASE TAKE NOTICE that, upon the annexed Affirmation of MICHAEL COHEN dated the 10th day of December, 2019, the Affirmation of LANNY DAVIS dated the 26th day of November, 2019, the Affirmation of MICHAEL MONICO dated the 9th day of December, 2019, the Affirmation of ROGER BENNET ADLER dated the 10th day of December, 2019, a copy of the Judgment and Commitment order, the sentence minutes, and all of the proceedings heretofore had herein, the undersigned will move in the United States District Court for the Southern District of New York, located at 500 Pearl Street in Courtroom 20B before Judge WILLIAM H. PAULEY on a date and time to be designated by the Court for an order pursuant to Rule 35(b) of the Federal Rules of Criminal Procedure for an order:

(1) Reducing the Court's previously imposed 36 month term of imprisonment, or, in the alternative, reducing it to a term of home confinement, coupled with a "community service" component,

- (2) Ordering a hearing to explore, evaluate, and quantify the cooperation which Defendant MICHAEL COHEN provided to the United States Government,
- (3) Granting such other and further relief as the Court deems just and proper.

Dated:

New York, New York

December 11, 2019

Yours, etc.,

Roger Bennet Adler, Esq. Attorney for Defendant 233 Broadway, Suite 2340 New York, New York 10279

(212) 406-0181

To:

Via ECF

Assistant U.S. Attorney Thomas McKay c/o United States Attorney's Office One St. Andrews Plaza New York, New York 10007

Via 1st Class Mail

Mr. Michael D. Cohen Inmate # 86067-054 c/o Otisville Camp P.O. Box 1000 Otisville, New York 10963

Via email

Lanny J. Davis, Esq. Michael Monico, Esq.