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April 28, 2022

2nd Circuit Court of Appeals
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

RE: Remote Oral Argument Request for *U.S. v. Keith Raniere*
Case#: 20-3520
Date: 05/03/2022

To the Honorable Court of the 2nd Circuit Court of Appeals

On May 3, 2022, I am set to orally argue on behalf of Mr. Keith Raniere in this matter.

I am writing to request permission to appear and argue remotely. Good cause exists for remote oral argument as I am located in California, and appearing in person would necessitate over fifteen hours of travel, all during our current pandemic as COVID-19 continues to be present and infectious. The total time allotted for this hearing is twenty minutes, with five minutes for each defense counsel and ten minutes for the government. The health risk weighed against a short argument provides good cause to allow me on behalf of Mr. Raniere to argue orally remotely, especially in light of an absence of prejudice to this Court or any party.

Neither the government nor Ms. Bronfman's counsel objects to me arguing remotely, as long as they are both permitted to argue before this Honorable Court in person. Therefore, I respectfully request that this Honorable Court allow this argument to be a hybrid of in-person and remote appearances.

Mr. Raniere also respectfully requests to appear remotely. He is presently incarcerated at a United States Penitentiary in Tucson, Arizona.

Therefore, I respectfully request that the Court grant this request and allow me to argue remotely on May 3, 2022.

Very truly yours,
Tully & Weiss Attorneys at Law

/s/ Joseph M. Tully

Joseph M. Tully

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