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July 16, 2024

VIA ECF and EMAIL

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Sajmir Alimehmeti* 16 Cr. 398 (PAE)

Dear Judge Engelmayer:

I write with regard to Sajmir Alimehmeti's pending motion for compassionate release.

I write to respectfully request that your Honor consider permitting us to make an oral presentation of our case. Additionally, Ms. Kunstler and I spoke with Mr. Alimehmeti earlier today and he asked if your Honor would permit him to attend any oral presentation virtually.

In today's call with Mr. Alimehmeti, we learned that he has been moved to "J Unit", where he enjoys limited additional privileges. Further, because he did so well as a unit orderly on "H Unit", and because of the trust that BOP staff have placed in him, ADX Florence has created a new unit orderly position on "J Unit", and Mr. Alimehmeti is the first person to hold this position – surpassing inmates who have been at ADX Florence for years longer than Mr Alimehmeti.

Your Honor's kind consideration of this request is appreciated.

Respectfully submitted,

Susan G. Kellman

Susan G. Kellman
Sarah Kunstler
Attorneys for Sajmir Alimehmeti

cc: AUSA Jane Chong