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*NOT ADMITTED TO THE NEW YORK BAR

August 6, 2020

VIA ECF

The Honorable Gary R. Brown
United States District Court for the Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722-9014

Re: *Flores v. Town of Islip*, No. 18 Civ. 3549(GRB)(SLT)

Dear Judge Brown:

We, along with co-counsel, represent the Plaintiffs in the above-referenced matter. In advance of the pretrial conference tomorrow, we write to inform the Court of an opportunity that has presented itself for conducting the upcoming trial on a remote basis, should it be helpful to the Court.

Impact Trial Consulting LLC ("Impact"), a trial services company, is willing to provide on a pro bono basis, technology to create a virtual courtroom for all parties and the Court. Impact uses *TrialbyZoom.com* to operate *Zoom for Government* in order to create the virtual courtroom; this is the most secure Zoom platform available and is authorized by the U.S. Department of Homeland Security. As a secure host, Impact would:

1. Manage the pre-registration process for all participants.
2. Test and train each participant.
3. Open the virtual courtroom and manage the online waiting room for participants every day.
4. Create online breakout rooms.
5. Conduct monitoring and real-time technology support for all registered users.
6. Stream the proceedings to the public.

If it would be helpful for the Court, we are prepared to answer questions about this potential option during tomorrow's conference.

Respectfully submitted,

/s/ Rachael A. Schuman

Rachael A. Schuman
Counsel for Plaintiffs

cc: All Counsel (via ECF)