

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

v.

MICHAEL T. FLYNN,

Defendant.

Case No. 17-cr-232 (EGS)

**MOTION FOR LEAVE TO
EXCEED PAGE LIMITS SET BY LOCAL RULE**

On May 13, 2020, the Court issued an order appointing me as *amicus curiae* “to present arguments in opposition to the Government’s Motion to Dismiss, ECF No. 198” ECF No. 205. The Court further directed me to “address whether the Court should issue an Order to Show Cause why Mr. Flynn should not be held in criminal contempt for perjury pursuant to 18 U.S.C. § 401, Federal Rule of Criminal Procedure 42, the Court’s inherent authority, and any other applicable statutes, rules, or controlling law.” *Id.* On May 19, 2020, the Court granted my request to submit a brief on or before June 10, 2020.

Under the Court’s Local Rules, absent leave of Court, a brief in a criminal case shall not exceed 45 pages, *see* Local Cr. R. 47(e), and “a brief filed by an *amicus curiae*. . . may not exceed 25 pages,” *see* Local Civ. R. 7(o)(4). Because my brief addresses the important and complex issues raised in the Government’s motion, I request leave to submit a brief not

