

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

**UNITED STATES OF AMERICA**

**v.**

**MICHAEL T. FLYNN,**

**Defendant**

**Crim. No. 17-232 (EGS)**

**NOTICE OF COMPLIANCE**

John Gleeson hereby notifies the Court that he has complied with its September 6, 2020 Minute Order by delivering three courtesy copies of the Court-appointed *amicus curiae*'s brief filed on June 10, 2020, at Docket No. 225, and accompanying exhibits, to this Court's Chambers.

/s/ John Gleeson  
John Gleeson<sup>1</sup>  
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*Court-appointed Amicus Curiae*

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<sup>1</sup> On May 18, 2020, the Court ordered that I be admitted pro hac vice to appear in this matter, be conferred full privileges to file and receive papers through the Court's CM/ECF system in this proceeding, and be excused from the local counsel requirement of Local Criminal Rule 44.1(c)(1). *See* Minute Order of May 18, 2020.