

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

UNITED STATES OF AMERICA,

V.

No. 21-cr-78 (RCL)

JOHN EARLE SULLIVAN

**REPLY TO REMAINING ISSUES IN GOVERNMENT'S
MOTION IN LIMINE**

Defendant, by and through undersigned counsel, does hereby respond to the remaining issues in the Government's Motion in Limine.

1. Jury nullification:

Defendant will not be arguing nullification.

2. Use of federal resources and timing of discovery:

These matters will be argued to the jury. However, defendant reserves his right to raise discovery violations to the Court.

3. Character evidence:

Defendant will abide by the relevant provisions Federal Rule of Evidence 404 in seeking to admit character evidence that is "pertinent" to

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served, via the Court's electronic filing system, upon all counsel of record on this the ___7th___ day of July, 2023.

_____/s/_____
Steven R. Kiersh