

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

**UNITED STATES OF AMERICA,**

**V.**

**No. 21-cr-78 (RCL)**

**JOHN EARLE SULLIVAN**

**REPLY TO MOTION IN LIMINE  
(Security Related Topics)**

Defendant, by and through undersigned counsel, does hereby file the following reply to the Government's Motion in Limine related to security related topics.

Defendant does not oppose the Government's Motion in Limine related to the following topics:

1. The exact locations of USCP CCTV cameras;;
2. Protocols of the U.S. Secret Service;
3. Exact locations of USCP cameras;

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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Attorney for John Sullivan

**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