

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

UNITED STATES OF AMERICA

v.

MICHAEL T. FLYNN,

Defendant

Crim. No. 17-232 (EGS)

JOINT NOTICE OF FILING

The United States of America, by and through the U.S. Attorney for the District of Columbia, and Michael T. Flynn, through his counsel, file this joint notice of filing. On February 27, 2020, the Court ordered the parties to file their joint proposed order setting forth the terms of the waiver of the attorney-client privilege and the authorization of disclosure of information with respect to Mr. Flynn's ineffective assistance of counsel claims by no later than 12:00 PM on March 6, 2020. The parties have met, conferred, and agreed on the terms of a joint stipulation, attached hereto as Exhibit A, setting forth certain agreed terms regarding Mr. Flynn's waiver of attorney client privilege, and the handling of information disclosed to the government by Mr. Flynn's former counsel at Covington & Burling LLP. The parties have further drafted a joint proposed order, consistent with the District of Columbia Rules of Professional Conduct Rule 1.6, and attached hereto as Exhibit B, authorizing Covington to take all actions reasonably necessary to respond to defendant Flynn's specific allegations of ineffective assistance of counsel, and requiring the government to treat any materials provided to it by Covington consistent with the terms set forth in the parties' joint stipulation and the previously-existing Protective Order (Doc.22).

Wherefore the parties request that the Court cause to be issued the joint proposed order attached hereto as Exhibit B.

Respectfully submitted,

/s/ Jocelyn Ballantine
TIMOTHY J. SHEA
U.S. Attorney for the District of Columbia

JOCELYN BALLANTINE
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/s/ Sidney Powell
SIDNEY POWELL
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Attorneys for Defendant