

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

MICHAEL T. FLYNN,

Defendant.

Criminal Action No. 17-232-EGS

**SECOND SUPPLEMENT TO MOTION TO DISMISS  
FOR EGREGIOUS GOVERNMENT MISCONDUCT**

On April 29, 2020, the government produced to the defense a second tranche comprised of eleven pages, including emails and additional Strzok-Page text messages. *See Brady v. Maryland*, 373 U.S. 83 (1963) and this Court’s standing order, ECF No. 10. The second production bears Bates labeled as DOJSCO – 700023465 through DOJSCO – 700023475. The government then produced to Mr. Flynn a redacted version of those documents, agreed as suitable for filing upon the public docket (“Redacted Production”). These documents further support Mr. Flynn’s Motion to Dismiss for Egregious Government Misconduct and in the Interest of Justice. ECF No. 162. The Redacted Production is attached in its entirety as Exhibit 1.

Dated: April 30, 2020

Respectfully submitted,

/s/ Jesse R. Binnall

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2020 a true and genuine copy of this Second Supplement to Motion to Dismiss for Egregious Government Misconduct and in the Interest of Justice was served via electronic mail by the Court's CM/ECF system to all counsel of record, including:

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Respectfully submitted,

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