

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
Tampa Division**

MICHAEL T. FLYNN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 8:23-cv-485 (MSS/CPT)
	)	
UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	
	)	

**CONSENT MOTION FOR SECOND EXTENSION OF TIME  
TO FILE SECOND AMENDED COMPLAINT  
DUE TO EXTRAORDINARY CIRCUMSTANCES**

Plaintiff, Michael T. Flynn, by counsel, and with the consent of opposing counsel, respectfully requests an additional 45-day extension to file his Second Amended Complaint in this matter on the grounds of extraordinary circumstances. Pursuant to this Court’s January 2, 2025, Order, should Plaintiff file an amended complaint, the deadline to do so is on or before April 7, 2025. Dkt. No. 49. While the Court noted “[n]o further extensions of time will be granted, absent extraordinary circumstances,” such extraordinary circumstances are present, and good cause exists for this extension. On March 25, 2025, President Trump signed an executive order, ordering the “Immediate Declassification of Materials Related to the Federal Bureau of Investigation’s

Crossfire Hurricane Investigation.”<sup>1</sup> These documents are directly relevant to this case, which stems from alleged misconduct in the FBI’s Crossfire Hurricane investigation. Dkt. No. 34 at ¶ 6. Plaintiff believes that these documents will significantly aid this litigation. Accordingly, Plaintiff is requesting this additional extension to give time for the documents to be released, and so that Plaintiff can incorporate those documents in his Second Amended Complaint, rather than having to move for a potential Third Amended Complaint. Moreover, because the United States has consented to the extension, there is no prejudice to the opposing party. Plaintiff has agreed to a reciprocal extension of reasonable time for the United States to file its response, which it will request after the filing of the Second Amended Complaint if it so chooses.

**Local Rule 3.01(g) Certification**

Undersigned counsel certifies that he conferred with counsel for the United States and the parties agree on the resolution of this motion.

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<sup>1</sup> Presidential Memoranda, THE WHITE HOUSE (Mar. 25, 2025), <https://www.whitehouse.gov/presidential-actions/2025/03/immediate-declassification-of-materials-related-to-the-federal-bureau-of-investigations-crossfire-hurricane-investigation/>.

### Conclusion

Respectfully, Plaintiff, Michael T. Flynn, requests a 45-day extension to be granted, and that the deadline for filing his Second Amended Complaint be on or before Thursday, May 22, 2025.

Dated: March 28, 2025

Respectfully submitted,

/s/ Jason C. Greaves

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**CERTIFICATE OF SERVICE**

I certify that on March 28, 2025, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

*/s/ Jason C. Greaves* \_\_\_\_\_  
Jason C. Greaves

*Counsel for Plaintiff*