

In the United States Court Of Appeals, 5th Circuit

<p>Brian P. Carr, Rueangrong Carr, and Buakhao Von Kramer Appellants</p> <p style="text-align: center;">versus</p> <p>United States, US Department of Justice, USPS, USPS OIG, USPS BoG, US CIGIE, Department of State, Department of State OIG, USCIS, DHS OIG, and SSA Appellees</p>	<p>Case No. 26-10025</p> <p>Verified¹ Consolidated Motions to:</p> <ul style="list-style-type: none"> • Amend the Caption <ul style="list-style-type: none"> - Adding Four Appellants - Adding Six Defendants / Appellees • Allow Submission of Joint Appeal • Sever the Sanctions, Recuse and Misconduct Complaints as Separate Actions <p>Certificate of Conference – OPPOSED²</p>
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Verified Consolidated Motions to:

- **Amend the Caption**
 - **Adding Four Appellants**
 - **Adding Six Defendants / Appellees**
- **Allow Submission of Joint Appeal**
- **Sever the Sanctions, Recuse and Misconduct Complaints as Separate Actions**

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Introduction

Consolidated Motions

These consolidated motions are submitted together as the topics are related with the later reliefs sought being highly dependent on the prior reliefs, e.g. Joint Appeal by all appellants depends on all the appellants and appellees being listed in the caption.

Amend the Caption

It is necessary before any appeals can be prepared and submitted that the appellants and appellees be clearly established.

Adding Rueangrong Carr as Appellant

It is requested that my wife, Rueangrong be clearly listed as an Appellant in these appeals.

Adding Buakhao Von Kramer as Appellant

Buakhao Von Kramer (Buakhao) is my wife's sister and was a pro se plaintiff in the district court. It is requested that she be considered as an Appellant in this matter.

Adding Rujipas Lawichai and Tanapon Lawichai as Appellants

My wife's sons are Rujipas Lawichai (Tin, his Thai nickname) and Tanapon Lawichai (Earth, his Thai nickname) and they were added as Plaintiffs in the proposed Second Amended Complaint ([ROA76-1pg1935](#))³. While the NOA

³ Each link to a district court document such as [ROA76-1pg1935](#) provides access to the relevant document as filed in the district court in ECF as in [document 76-1](#). There is also the mandated page number in the ROA (e.g. 1935 in the case of 76-1) which links to the identical excerpted document but with the ROA case number and page number in the footer. Either link should be accurate.

([ROA96pg2492](#)) does not specifically mention Tin or Earth, it does complain of the improper denial of [ROA76pg1908](#) which requested the addition of Tin and Earth as plaintiffs.

Adding IRS and TIGTA as Defendants / Appellees

While the matter was pending without any decision for almost a year, circumstances changed and a new dispute arose with the Internal Revenue Service (IRS) and the Treasury Inspector General for Tax Administration (TIGTA) which was remarkably similar to the complaints against USPS, DoS, and USCIS (and their IGs) with falsified statements and failure to report crimes to the DOJ.

Adding Mr. Padis and AUSA Parker as Defendants / Appellees

Appeals of denied motions for sanctions such as those against Mr. Padis ([ROA79pg2092](#)) and AUSA Parker ([ROA83pg2189](#)) are normally processed as appeals against the attorney who violated [FRCP Rule 11](#). As such, these attorneys should be added as appellees so that the matters can be severed and processed as separate actions.

Adding Magistrate Rutherford and Judge Scholer as Appellees

It is requested that the misconduct complaints against Magistrate Rutherford and Judge Scholer be explicitly joined with this appeal as they concern federal crimes and serious violations of individual constitutional rights which warrant greater public transparency. There is also substantial overlap with the appeal of the denial of the Motions for Sanctions and the apparent collusion between DoJ and the court.

Allow Submission of a Single Joint Appeal by All Appellants

We also seek permission to file a single joint appeal for all Appellants. Any consideration of separate appeals of each appellant and each defendant and the

numerous combinations suggests that separate appeals would be so numerous and repetitive as to be unworkable. The numerous facets of the appealable issues are elaborated with a coarse outline of the intended joint appeal to justify time and length exceptions.

Updates to Prior Motion for Extension ([5CC20-1](#))

The previous motion for an extension in time [5CC20-1](#) suggested that an attorney would be representing all parties. It turns out this was not feasible and we are remaining as pro se parties.

Amendments to Record on Appeal (ROA) Required

In preparing for this motion and the format of references to the ROA as required in appeal briefs, I discovered that there are four serious errors in the ROA which must be corrected before any appeal brief can be submitted. There will shortly be two motions to request these amendments to the ROA. I ask that any deadlines for submission of the initial appeal briefs be tolled until all three motions are decided and that the matter be re-docketed at that time.

Exceptions to Brief Length and Time to Prepare Brief Requested

Consolidating separate appeals into a joint appeal greatly increases judicial efficiency, but the logistical realities is that with multiple appellants and appellees the combinations of appealable issues requires additional time and space. As a result additional time and space are requested.

Sever the Sanctions, Recuse and Misconduct Complaints as Separate Actions
We request that the appeals of denials of sanctions, and denials to recuse (along with the corresponding misconduct complaints) be severed as a separate action.

Amend the Caption

There are a series of motions to adjust the caption of this matter.

Adding Rueangrong Carr as Appellant

While I submitted the Notice of Appeal (NOA, [ROA96pg2492](#)) solely on my own signature it is obvious that my wife, Rueangrong Carr, is an appellant according to [FRAP 3](#) and the obvious intention that our interests be considered together as part of our legal union.

[FRAP 3](#) states:

- (b) Joint or Consolidated Appeals...
- (2) A pro se notice of appeal is considered filed on behalf of the signer and the signer's spouse..., unless the notice clearly indicates otherwise.

Adding Buakhao Von Kramer as Appellant,

As immediate family members, Buakhao, my wife and I have numerous overlapping interests in life and in the underlying complaint ([ROA29pg611](#)). Every one of the contested orders and denied motions impacted the three of us.

Further, one of the denied 'motions' ([ROA66pg1501](#)) in the final order ([ROA95pg2491](#)) was submitted by Buakhao and the NOA [ROA96pg2492](#) explicitly challenges the denial of [ROA66pg1501](#). In addition, Buakhao's interests are an integral part of the complaint ([ROA29pg611](#)) as well as the proposed Second Amended Complaint ([ROA76-1pg1935](#)) and their dismissal / denial were contested at length in the NOA [ROA96pg2492](#).

[FRAP 3](#) states:

- (b) Joint or Consolidated Appeals...
- (4) The notice of appeal encompasses all orders that, for purposes of appeal,

merge into the designated judgment or appealable order. It is not necessary to designate those orders in the notice of appeal.

By explicitly contesting the denial of [ROA66pg1501](#) which was signed by and submitted by Buakhao I was including Buakhao in the NOA.

Interests of All Plaintiffs Overlap In Each Count

In each of the Counts in [ROA29pg611](#) and [ROA76-1pg1935](#) the interests of all plaintiffs overlap such that it is not possible to separate the interests. For example, all the primary counts entailed some fee which I paid. For the immigration visas, I prepared the application and paid the fees, my wife signed the petition (which entailed significant commitments), and Tin, Earth, and Buakhao were the beneficiaries who did the required research and provided required documents. As each claim is intertwined among multiple plaintiffs, the NOA against the final order ([ROA95pg2491](#)) which dismissed all claims impacted all plaintiffs (and requested additional plaintiffs) and it was clear that all plaintiffs were intended appellants.

Buakhao's DoS and SSA Claims at Heart of Court's Misconduct

My wife's sister, Buakhao, is also the widow of Nikolaus Von Kramer, a U.S. citizen and pre-1968 U.S. Army veteran. Central to her claim is her attempts receive Social Security surviving spouse benefits [ROA84-1pg2219 para5,99-133pg5,22-27](#) and ignored by the court.

In order to receive such benefits overseas, foreign nationals must visit the U.S. for at least a month to initiate benefits and then can not stay outside the U.S. for more than six months but must return for a full month every six months.

This process of regular lawful visits must continue for at least five years to establish a 'lawful presence' at which time the benefits can be received overseas and there is no longer a requirement to visit the U.S..

The relief sought from the court for Buakhao is most simple, declaratory relief that she was improperly denied the ability to visit the U.S. with a non immigrant visa by the Department of State (DoS) for three years and that she should be given credit for three years of 'lawful presence' for the consideration of the Social Security Administration. [ROA84-1pg2219](#) [relief15-16,pg70-71](#)

This very simple relief was the source of several of the transparently false statements made by the court in its decisions which try to conceal the violations by Department of State (DoS) which clearly warrant the declaratory relief which was sought.

Foundation of Court's Misconduct Was Denial of Electronic Signatures

In the Findings, Conclusions, and Recommendation (FCR) [ROA61pg1417](#) the court makes false and misleading statements in order to dismiss all claims. Central to this subterfuge was the challenge to the electronic signatures of my wife and Buakhao to the complaint [ROA29pg611](#). Any reasonable reading of [TXND Local Civil Rules LR 1.1](#) and [LR 11.1\(d\)](#) would conclude that there is a straightforward procedure for pro se parties to file a document electronically in ECF and certify the consent of other parties to their electronic signature. However, the court seems to have contorted the clear meaning to instead conclude that it is not possible for pro se parties to ever certify the signatures of other parties.

This absurd conclusion is contested at length in Objections [ROA92pg2402](#) pg 16, section ‘The Court Misunderstands Local Rules for Electronic Signatures’ but it was the foundation of the courts dismissing most of the claims (as my wife and her sister had purportedly not signed the complaint [ROA29pg611](#) there was no standing for the claims). Indeed, Buakhao physically signed a printed copy of the complaint ([ROA29pg611](#)) as [ROA66pg1501](#) but the court ignored this clear remedy without any discussion and simply denied [ROA66pg1501](#) without any explanation.

However, in the light of the court’s refusal to accept any joint document, I submitted the NOA [ROA96pg2492](#) without concerns about making it a joint document as the court had challenged every method of adding the signature of others. I instead relied on [FRAP 3](#) and its clear statements that intent overrides any errors of omitting specific named parties.

NOA [ROA96pg2492](#) Makes It Clear Buakhao Was An Intended Appellant While the NOA [ROA96pg2492](#) pg6-7 does not explicitly mention Buakhao, it describes the false statements at length and the court's concealing her improperly denied non immigrant visas. See [ROA67pgSealed](#) pg43-44 ‘The Court Falsifies Visas Denials To Conceal DoCNR Challenges’ referring to ([ROA29pg611](#)) pg12-21.

[FRAP 3](#) goes on to state:

- (b) Joint or Consolidated Appeals...
- (7) An appeal must **not** be dismissed for... failure to name a party whose intent to appeal is otherwise clear from the notice⁴

⁴ Bold added by appellant.

Clearly Buakhao must be considered as an appellant because NOA [ROA96pg2492](#) makes it clear that Buakhao was an intended party to the appeal.

Adding Rujipas Lawichai and Tanapon Lawichai as Appellants

My wife's sons Tin and Earth were added as Plaintiffs in the proposed Second Amended Complaint ([ROA76-1pg1935](#)). While the NOA ([ROA96pg2492](#)) does not specifically mention Tin or Earth, it does complain of the improper denial of [ROA76pg1908](#) which requested the addition of Tin and Earth as plaintiffs.

Central to this appeal is the apparent collusion between the Department of Justice (DoJ) and the District Court of Northern Texas (TXND). FCR [ROA61pg1417](#) of 27 Feb 2025 was filed just one day before my wife became significant a citizen.

Before my wife became a citizen on 28 Feb 2025 [ROA71-3pg1652](#) our primary relief from USCIS was to remedy their failure to grant her citizenship as approved by USCIS [ROA10-5pg177](#) on 31 Jan 2023 (more than two years earlier). Of course such delays by USCIS are improper and contrary to statute.

There was somewhat speculative relief in the complaint ([ROA29pg611](#)) of expedited processing of any immigrant visa applications of immediate relatives to compensate for the delay by USCIS in the rights of citizenship for my wife.

However, it was not known which, if any, of her immediate relatives would qualify making this relief speculative in nature.

After my wife became a citizen, immigration applications were completed by Earth [ROA71-1pg1650](#), Tin [ROA71-6pg1655](#), and Buakhao [ROA71-7pg1656](#). This required a proposed Second Amended Complaint [ROA76-1pg1935](#) which removed the satisfied relief of citizenship for my wife but elaborated on the previously speculative relief of expedited processing of immigration applications for Buakhao, Tin, and Earth.

As cited above, [FRAP 3](#) states:

(b) Joint or Consolidated Appeals...

(4) The notice of appeal encompasses all orders that, for purposes of appeal, merge into the designated judgment or appealable order. It is not necessary to designate those orders in the notice of appeal.

By explicitly identifying the denial of the Motion to Amend [ROA76pg1908](#) I was implicitly including Tin and Earth in the NOA [ROA96pg2492](#).

Again, according to [FRAP 3](#):

An appeal must not be dismissed for... failure to name a party whose intent to appeal is otherwise clear from the notice

and the intention to include Tin and Earth in the appeal is quite clear. Very early on the Fifth Circuit Court upheld this interpretation of [FRAP 3](#) in [Garcia v. Wash, 20 F.3d 608, 609 \(5th Cir. 1994\)](#) where it stated:

Similarly, [Rule 3\(c\)](#) was amended to prevent the loss of appellate rights where, as here, an intended party to an appeal fails to be named specifically.

As mentioned above, we are all immediate family members and our interests overlap in complex ways which require the consideration of all the family members as appellants.

Adding IRS and TIGTA as Defendants / Appellees

There was an extended delay between the Motion to Dismiss (MTD) [ROA31pg867](#) of 14 May 2024 and the Findings, Conclusions, and Recommendation (FCR) [ROA61pg1417](#) of 27 Feb 2025. During that delay my wife and I had problems with the IRS and TIGTA violating clear and specific statutes as well as federal crimes which were quite similar to the violations of the other defendants. As such they were added as defendants in the proposed Second Amended Complaint ([ROA76-1pg1935](#)).

The NOA ([ROA96pg2492](#)) complains of the improper denial of [ROA76pg1908](#) and suggests that the IRS collaborated in the apparent collusion between the Department of Justice (DoJ) and the District Court of Northern Texas (TXND). This requires that these proposed defendants be appellees as they can provide input on the sanctions, recuse and misconduct aspects of the appeal.

Further, for the court to have personal jurisdiction over a party / agency, proper service is not strictly required. The court need only be certain of timely notice of the complaint (which is most easily accomplished via proper service). Indeed, it can be argued that the request for assistance in [ROA67-1pgSealed](#)⁵ notified IRS and DoJ of the problems (fulfilling exhaustion of remedies requirements) and that

⁵ At this time this motion was filed the ECF document was available (with hyperlink [ECF67-1](#)) but the ROA version was not yet available. The Sealed hyperlink goes to the ECF version until the ROA version is available at which time the hyperlink will instead take you to the ROA version.

the ensuing collusion with DoJ demonstrated notice of the complaint.

Adding Mr. Padis and AUSA Parker as Defendants / Appellees

There were two Motions for Sanctions under [FRCP Rule 11\(c\)\(2\)](#) against Mr. Padis ([ROA79pg2092](#)) and AUSA Parker ([ROA83pg2189](#)) the denial of which was (according to the NOA [ROA96pg2492](#)) an 'abuse of discretion'. However, Mr. Padis and AUSA Parker must be considered as defendants and appellees so that they can be afforded due process and defend themselves.

Of course appealed motions for sanctions are often handled as separate matters but as the plaintiffs were damaged by the actions of the DoJ attorneys (and are eligible for costs) the appellants must also provided with due process and be included in the separate matters.

The apparent improper collusion of DoJ and TXND is elaborated in more detail in [ROA79pg2092](#).

Adding Magistrate Rutherford and Judge Scholer as Defendants / Appellees

There are separate misconduct complaints against Magistrate Rutherford and Judge Scholer. While such matters are normally dealt with discretely with little public transparency, in this case we ask that complaints be joined with separate appeals so that the damages to the plaintiffs / appellants can be given full consideration.

These are not simple matters of lack of discretion but instead federal crimes with serious damages to individuals.

Misconduct complaints and improper refusal to recuse are normally dealt with

privately by the Judicial Council of the Fifth Judicial Circuit. Presumably this is because such misconduct can be issues of discretion with allegations which may turn out to be unfounded. There is little reason to impugn the character of judges when there could be no basis for the complaint.

However, a central aspect of the NOA [ROA96pg2492](#) was misconduct by Magistrate Rutherford and Judge Scholer through federal crimes under [18 USC § 1001](#) falsifying government records (in their decisions and orders) and collusion with DoJ to deny individual constitutional rights.

Further, these are not questions of discretion which can be disputed but rather clearly established crimes based on the documents filed with the court and with full public access.

Indeed the initial misconduct complaints were attached to the NOA as [ROA96-1pg2514](#) and [ROA96-2pg2533](#) with the accepted complaints as [5CCrCR](#) and [5CCrSR](#) (Rutherford) and [5CCrCS](#) and [5CCrSS](#) (Scholer). While most such misconduct complaints are handled privately by the Judicial Council of the Fifth Circuit (JC5C) in this case all the misconduct is readily apparent in the record in this matter and, therefore, public information. Further, the damages which resulted from their improper collusion with DoJ and other federal agencies requires greater transparency.

Of course Magistrate Rutherford and Judge Scholer must also be provided with

due process and their right to defend themselves against these accusations (which is intrinsic to JC5C) so it is requested that the JC5C proceedings be merged with this appeal and the appeal of the denied Motions to Recuse to insure that the damaged parties also have due process and the ability to represent their interests.

Allow Submission of a Single Joint Appeal by All Appellants

[FRAP 3](#) also states:

(b) Joint or Consolidated Appeals.

(1) When two or more parties are entitled to appeal from a district-court judgment or order, and their interests make joinder practicable, they may file a joint notice of appeal. They may then proceed on appeal as a single appellant.

We, the appellants, are all immediate family members and our interests are so intrinsically intertwined that it is not reasonable to attempt to separate the appeals. A single joint appeal permits allows improved judicial efficiency and avoids repetitive 'boilerplate' appeals which repeat virtually the entirety of each claim with only fine adjustments in the damages or relief.

The duty to perform, failure to perform, damages and relief are in most cases identical with only minor variations between the parties. To delay the immigration visas for my wife's sons damages all parties (we are a family) and the relief sought benefits all family members.

Updates to Prior Motion for Extension ([5CC20-1](#))

The difficulties of finding an attorney who was interested and willing to represent several or all of the family members appears to be insurmountable. With DoJ

explicitly sanctioning lawyers, universities, and law firms which oppose their clear violations of the statutes and constitution has had the chilling effect described in the lead D.C. Circuit Court, case [Perkins Coie LLP v. U.S. Department of Justice, et al., D.C. Circuit 25-5241](#). Until the Supreme Court or Congress stop such reprisals and retaliation by the DoJ it is clear that all parties seeking relief from the violations of DoJ and complicit federal agencies will be forced to continue pro se.

James David Mercer, California Bar #233569 had expressed an interest in assisting in this matter but the significant barriers to appearing in this matter combined with his winding down his practice prevented him from taking on this new challenge.

There is also the significant challenge that four of the family members are in Thailand at this time and soliciting their approval of this joint motion is a logistical challenge. All four parties are in different provinces at this time increasing the challenge.

Overview of Anticipated Appeal Brief

It is expected that the appeal brief will have the following main sections:

- United States Postal Service (USPS) claim concerning falsified delivery time for ‘guaranteed delivery’ package and fraudulent claim to have paid refund when no such payment was made.
- Department of State (DoS) challenges to Doctrine of Consular Non Reviewability (DoCNR) based on denied non immigration visas contrary to clear and specific statutes and violating most (if not all) of the elements of due process as well as falsifying government records, a federal crime.

- United States Citizenship and Immigration Services (USCIS) violations of clear and specific statutes: to provide documentation to all permanent residents, promptly adjudicate I-751 applications, and promptly administer the oath of allegiance after approving N-400 applications. There are also criminal violations of falsifying records and violating individual constitutional rights.
- Internal Revenue Service (IRS) violations of clear and specific statutes by initiating property seizure while an appeal was pending and without the statute mandated 30 day notice. Further, the seizure notice contained false statements about the need for immediate action which is a federal crime.
- Four Inspector General Offices (USPS, DoS, DHS, and TIGTA) which violated clear and specific statutes mandating reporting federal crimes to the Department of Justice (DoJ) as well as not correcting abuse in the form of violations of individual constitutional rights (due process).
- CIGIE and DoJ failures to abide by their charters to enforce the law and correct violations of individual constitutional rights.
- Constitutional Questions and issues of law to include:
 - * Have the courts and agencies infringed on the right to representation such that the poor and uneducated can not choose / find appropriate representatives, e.g. immediate family members.
 - * Does [FRCP Rule 56](#) provide for [Rule 56\(d\)](#) Motion or [Rule 56\(d\)](#) Responses? The Fifth Circuit Court seems to have standardized on [Rule 56\(d\)](#) motions while the Third Circuit Court accepts [Rule 56\(d\)](#) Responses. I personally believe that greater judicial efficiency is provided by [Rule 56\(d\)](#) Responses (no explosion in the number of

pending motions), but this can only be resolved by the Supreme Court.

- * Are courts required to make the [FRCP Rule 72](#) Notices to pro se parties in a prominent fashion (as required by all circuit courts in some form) or can the court intentionally conceal the notice?
- * Does Sovereign Immunity extend to credits for future services when the agency has violated clear and specific statutes and not performed the service as required by law (can the court order redo's when the agency did not get it right the first time)?
- [FRCP Rule 11\(c\)\(2\)](#) Motions for Sanctions denials were 'abuse of discretion' as the court simply declined to consider sanctions without any consideration of the facts or circumstances.
- While the denial of Motions to Recuse and Misconduct Complaints can be based on incomplete allegations of personal indiscretion where privacy is well justified, these particular complaints are based on well considered affirmed statements in the public record and include compelling evidence of federal crimes of falsifying government records.

Based on the Magnitude and Complexity of Appeals Exceptions Requested

Requested Length Exception (65,000 words)

The Fifth Circuit Court supplemented [FRAP 32\(a\)\(7\)](#) states:

(7) Length.

(A) Page limitation. A principal brief may not exceed 30 pages... unless it complies with Rule 32(a)(7)(B).

(B) Type-Volume Limitation.

(i) A principal brief is acceptable if it:

* contains no more than 13,000 words; or

* uses a monospaced face and contains no more than 1,300 lines of text

It is expected that consolidation of numerous joint appeals will reduce the overall length from numerous separate appeals by avoiding needless repetition. However, given the number of appealable issues / topics from above (9), the number of appellants (5), and the number of appellees (15), we are requesting that we are permitted five times the length of a single normal appeal brief (65,000 words).

When writing legal papers I always try to be convincing and even compelling. This is normally accomplished by being clear, concise and correct which includes avoiding needless verbosity (though white space management and useful section headers can aid the reader in skipping topics where no convincing is required). As such it is expected that only half the requested length will be required, but this does not include any buffer for unforeseen circumstances. The buffer of an extra 33,000 words is requested so that there won't be needless additional motions in the event that the original estimate was too low.

Requested Time Exception (80 days)

[FRAP 31](#)(a)(1) states:

The appellant must serve and file a brief within 40 days after the record is filed.

However, given the expected magnitude of the consolidated joint appeal brief we are requesting this time be doubled to 80 days after the amended record is available with the amended captions. As we seek prompt resolution of this matter we will endeavor to prepare the brief as quickly as possible and expect that it is likely the brief will be filed within 40 days (half the requested time and the normal time for such briefs), but this estimate does include the margin for error to provide for unexpected problems. The additional time is sought so that unforeseen

circumstances won't require an additional request for additional time.

Sever the Sanctions, Recuse and Misconduct Complaints as Separate Actions

While it certainly improves judicial efficiency to join the appeals of the different appellants, it is suggested that court could also improve judicial efficiency by later severing the sanctions and misconduct from the base appeal. However, as apparent and improper collusion between the DoJ and district court are central to each of these appeals, they might be processed most expeditiously if they remained combined. Obviously decisions of improved judicial efficiency are exclusively in the purview of the court.

Conclusion

For the reasons stated the court is asked to amend the caption, grant permission to submit a joint appeal, grant extensions in time and space and sever appeals for denied motions for sanctions and motions to recuse as well as the misconduct complaints.

The court is also asked to provide such other and further relief as the court deems appropriate.

Respectfully Submitted,

Verification of Motion

I, the undersigned appellant, hereby affirm under penalty of perjury in both the United States and Thailand that:

1. I have reviewed the above motion and certifications below and believe all of the statements to be true to the best of my knowledge.
2. I have reviewed the associated documents and exhibits and believe them to be true and accurate copies with the exception of the documents identified as

being redacted. The redacted documents have only been altered to remove sensitive personal information according to normal redaction procedures.

I hereby reaffirm that the above is true to the best of my knowledge under penalty of perjury in both the United States and Thailand.

/s Brian P. Carr

Brian P. Carr
1201 Brady Dr
Irving, TX 75061

Date: 7. May 2026

Location: Irving, TX

Other Signatories

/s Air Carr

/s Buakhao Von Kramer

Rueangrong Carr
1201 Brady Dr
Irving, TX 75061

Buakhao Von Kramer
105 - 3 M 5 T YANGNERNG
SARAPEE, CHIANG MAI 50140
THAILAND

Date: 19 Aug 2025
Location: Irving, TX

Date: 20 Aug 2025
Location: Bangkok, Thailand

/s Rujipas Lawichai

/s Tanapon Lawichai

Rujipas Lawichai
Ban Tha Sala 1 Moo 7
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Chiang Rai 57130 Thailand

Tanapon Lawichai
Ban Tha Sala 1 Moo 7
Si Mueang Chum, Maesai,
Chiang Rai 57130 Thailand

Date: 20 Apr 2026
Location: Phuket, Thailand

Date: 21 Apr 2026
Location: Lopburi, Thailand

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Required Certificates of Compliance

The undersigned hereby certifies under penalty of perjury:

Conference Compliance⁶

These Consolidated Motions to:

- Amend the Caption
 - Adding Four Appellants
 - Adding Six Defendants / Appellees
- Allow Submission of Joint Appeal
- Sever the Sanctions, Recuse and Misconduct Complaints as Separate Actions

are OPPOSED.

The conference was held via an email sent to AUSA Parker on 20 Apr 2026 with a response on 28 Apr 2026 which states that the ‘Defendants object to all of the proposed motions’. As such, defendants are OPPOSED to these motions.

FRAP 32(g)(1) Length Compliance

This document complies with the type-volume limitation of [FRAP 27\(d\)\(2\)\(A\)](#) because, excluding the parts of the document exempted by [FRAP 32\(f\)](#), this document contains 4,186 words (which is less than the nominal 5,200 words for a single motion), as determined by LibreOffice Writer word processing software⁷.

2. This document complies with the typeface requirement of [FRAP 32\(a\)\(5\)](#) and the type-style requirements of [FRAP 32\(a\)\(6\)](#) because this document has been prepared in a proportionally spaced typeface using LibreOffice Writer using Times New Roman (14-point).

⁶ According to the Fifth Circuit Court's [Electronic Noticing and Filing Options Available to Pro Se Parties](#): All parties filing motions must also conduct a conference with all parties regarding the motion, the filer must contact all parties, advise what the motion will seek and ask each if they are opposed or unopposed to the motion

⁷ LibreOffice Writer does not have an ability to count words in a document excluding sections but instead can count words in the entire document (not useful or correct for this purpose) or in the selected section. By selecting everything below the Table of Contents but above the first signature block I can get the word count and then manually enter the count in the certification. The certified word count was accurate on 7 May 2026 at 7PM.

Certification Of Electronic Signatures

In accordance with [Fifth Circuit Rules and Internal Operating Procedures \(FCRIOP\)](#) which states:

25.2.10 Signatures... Documents which require more than one party's signature must be filed electronically by... showing the consent of the other parties on the document; or any other manner approved by the court.

I hereby certify that I did indeed receive the consent of the other parties to include their signatures on this document.

FRAP 25(b) Service

On the recorded date of this document, I electronically submitted the foregoing document with the clerk of 5th Circuit United States Court Of Appeals using the electronic case filing system (ECF) of the court. I also hereby certify that on this same date no copies were served via U.S. mail as all parties in this matter are enrolled in the court's electronic case filing (and service) system.

/s Brian P. Carr

Brian P. Carr
1201 Brady Dr
Irving, TX 75061

Date: 7. May 2026

Location: Irving, TX