

In the United States Court Of Appeals, 5th Circuit

Brian P. Carr, Rueangrong Carr, and Buakhao Von Kramer we versus 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	Case No. 26-10025 Verified Motion for Future Document Length Relief Certificate of Conference – OPPOSED
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Verified Motion for Future Document Length Relief

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Table of Contents: Basic Abbreviations Used

The following abbreviations are utilized throughout this document to ensure concise, clear arguments and explanations:

Abbreviation: Full Name or Phrase

5CCLR: Rules and Internal Operating Procedures of the Fifth Circuit

AUSA: Assistant United States Attorney

CFR: Code of Federal Regulations

CM/ECF or ECF: Case Management/Electronic Case Files system

DoJ: Department of Justice

FRAP: Federal Rules of Appellate Procedure

FRCP: Federal Rules of Civil Procedure

LPR: Lawful Permanent Resident

MTD: Motion to Dismiss

MSJ: Motion for Summary Judgment

MTR: Motion to Reconsider

NOA: Notice of Appeal

PACER: Public Access to Court Electronic Records

PII: Personal Identifying Information

ROA: Electronic Record on Appeal

TXND: United States District Court for the Northern District of Texas

USATXN: U.S. Attorney's Office for the Northern District of Texas

Abbreviation: Full Name or Phrase

USCA5 or 5CC: United States Court of Appeals for the Fifth Circuit

USC: United States Code

USCS: United States Code Section (e.g., [18 USCS 1001](#))

USCIS: United States Citizenship and Immigration Services

Table of Contents: Hyperlink Usage

Understanding Hyperlinks Provided With Case / ROA Citations

To enhance readability and provide easy access to the cited material, our citations embed hyperlinks using the following conventions:

[ECFdktN](#)

Links to a copy of TXND ECF document for case 3:23-cv-02875-S where dktN represents the document number.

Example: [ECF10-5](#) links to a copy of TXND ECF case 3:23-cv-02875-S document 10-5.

[5CCdktN](#)

Links to a copy of USCA5 ECF Case No. 26-10025 where dktN represents the document number.

Example: [5CC35-5](#) links to a copy of USCA5 ECF document 35-5, an exhibit attached to motion [5CC35-1](#).

[ROAdktNpgNNN](#)

A dual-link citation for documents from the Record on Appeal for Case No. 26-10025. The first portion ([ROAdktN](#)) links to the document from the TXND ECF, while the end page number ([NNN](#)) links to the document which starts at the specific page number from the USCA5 ROA file.

Example: In [ROA10-5pg177](#), [ROA10-5](#) has a link to [ECF10-5](#), the document 10-5 from the TXND ECF. [177](#) has a

different link to the same document extracted from page 177 of the ROA (but none of the preceding or following documents).

Privacy Exceptions: To comply with federal privacy mandates, no hyperlinks are provided for properly sealed documents. Sealed records are referenced using the text format above, but there is no link which prevents public access to the sealed document.

Hyperlinks Included For Existing Records and Exhibits

Exhibits Not Repeated in Every Motion, Hyperlinks Offer Better Access

While it is customary in this court for every motion to have an exhibit for each referenced document, we have chosen not to clutter the court's record with multiple copies of the same exhibits. If an exhibit is already in TXND ECF we instead simply cite ECFxxx to accurately describe the document referred to and provide easy access to a copy of the document, e.g. [ECF10-5](#) has link to an important exhibit which was provided previously.

If an adjudicator, opposing counsel, or a member of the public wishes to inspect a referenced docket entry, they can click the blue hyperlink to open the file and later easily return to the text of our argument.

I. Relief Requested

We request an order directing the clerk to evaluate the length of all computer-produced documents solely by word count, as required by the federal rules, rather than by page count. The clerk must also exclude the specific document sections exempted by the rules when calculating these length limits.

We further request that any future rejection notices or correction orders issued by the clerk for computer-produced documents explicitly state the correct word count limit and list the standard exclusions.

II. Legal Standard for Document Length

The clerk's order [5CC43-13](#) stated that our MTR [5CC43-1](#) exceeded a 20-page limit under [FRAP 27](#). However, the rule creates two distinct categories for document length. [FRAP 27](#)(d)(2) states:

- (2) Length Limits. Except by the court's permission, and excluding the accompanying documents authorized by [Rule 27](#)(a)(2)(B) [affidavits]:
 - (A) a motion or response to a motion produced using a computer must not exceed 5,200 words;
 - (B) a handwritten or typewritten motion or response to a motion must not exceed 20 pages;

Our motion [5CC43-1](#) was produced on a computer, submitted electronically, and included hyperlinks. Therefore, [FRAP 27](#)(d)(2)(A) governs the document, and the correct legal limit is 5,200 words, not 20 pages.

Additionally, the clerk's order omitted the mandatory exclusions listed in [FRAP 32](#)(f). When calculating document length, [FRAP 32](#)(f) states:

- (f) Items Excluded from Length. In computing any length limit, headings, footnotes, and quotations count toward the limit but the following items do not:
 - * cover page;
 - * disclosure statement;
 - * table of contents;
 - * table of citations;
 - * statement regarding oral argument;
 - * addendum containing statutes, rules, or regulations;

- * certificate of counsel;
- * signature block;
- * proof of service; and
- * any item specifically excluded by these rules or by local rule.

III. Argument

The use of an incorrect page-count standard penalizes clarity and readability. Because the federal rules set the limit for computer-produced motions in words rather than pages, we used generous white space and clear formatting. This layout makes our complex explanations and arguments easier for the court to read and understand.

Using white space can cause a compliant document to take up more physical pages than a densely typed paper. Our motion [5CC43-1](#) was a consolidated filing that addressed three separate motions for rulings, challenged two clerk orders, and requested the reopening of the case. It totaled 42 pages, but the formal certification showed a count of 7,152 words.

While this word count does exceed the 5,200-word limit, the clerk's order rejected the document based on an inapplicable 20-page standard. A clerk's order which rejects a filed document must apply the proper rule. A proper notice would state:

[document] was produced using a computer and, in accordance with [FRAP 27\(d\)\(2\)\(A\)](#), must not exceed [number specified by type of document, 5,200 applies to motions] words excluding the parts of the document exempted by [FRAP 32\(f\)](#)

To ensure fair proceedings and accurate records, the clerk must use the actual word limits established by [FRAP 27\(d\)\(2\)\(A\)](#) and [FRAP 32\(7\)](#) and respect the exclusions in [FRAP 32\(7\)\(f\)](#) whenever a certificate of compliance shows a

document was prepared on a computer.

IV. Conclusion

For these reasons, we respectfully request that the court order the clerk to apply word count limits and rule exclusions to all computer-produced documents, and to specify those exact criteria in any future correction notices.

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: 12. July 2026

Location: Irving, TX

Other Signatories

/s Air Carr

/s Buakhao Von Kramer

Rueangrong Carr	Buakhao Von Kramer
1201 Brady Dr	105 - 3 M 5 T YANGNERNG
Irving, TX 75061	SARAPEE, CHIANG MAI 50140
	THAILAND
Date: 19 Aug 2025	Date: 20 Aug 2025
Location: Irving, TX	Location: Bangkok, Thailand
 <i>/s Rujipas Lawichai</i>	 <i>/s Tanapon Lawichai</i>
Rujipas Lawichai	Tanapon Lawichai
Ban Tha Sala 1 Moo 7	Ban Tha Sala 1 Moo 7
Si Mueang Chum, Maesai,	Si Mueang Chum, Maesai,
Chiang Rai 57130 Thailand	Chiang Rai 57130 Thailand
Date: 20 Apr 2026	Date: 21 Apr 2026
Location: Phuket, Thailand	Location: Lopburi, Thailand

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Certificate of Counsel / Pro Se Party

The undersigned hereby certifies under penalty of perjury:

1. Certificate Of Interested Persons

The following listed persons and entities as described in [5CCLR 28.2.1](#) have an interest in the outcome of this case. These representations are made in order that the judges of this court may evaluate possible disqualification or recusal:

1. Brian P. Carr, Appellant
2. Rueangrong Carr, Appellant
3. Buakhao Von Kramer, Appellant
4. Tanapon Lawichai, potential Appellant
5. Rujipas Lawichai, potential Appellant
6. United States of America, et al., App appellees
7. Tami C. Parker, Counsel for Appellees with appealed motion for Sanctions, potential Appellee
8. George Monroe Padis, previous Counsel for Appellees with appealed motion for Sanctions, potential Appellee
9. TXDN Magistrate Rebecca Ann Rutherford with misconduct complaint and motion to recuse, potential Appellee
10. TXDN Judge Karen Gren Scholer with misconduct complaint and motion to recuse, potential Appellee

2. Certificate of Contact / Conference Compliance

In compliance with [5CCLR 27.4](#), I contacted AUSA Parker via email concerning this motion and on 2 Jun 2026 AUSA Parker stated:

Defendants oppose all your other proposed motions

As such, appellees / defendants are considered to be OPPOSED to this motion.

3. [FRAP 32\(g\)\(1\)](#) Length Compliance

This motion 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 556 words (which is less than the nominal 5,200 words for a single motion), as determined by LibreOffice Writer word processing software¹.

4. [FRAP 32\(a\)\(5\)](#) Typeface Compliance

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).

5. Certification Of Electronic Signatures

In accordance with [5CCLR 25.2.10](#) 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.

¹ 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 30 Jun 2026 at 1PM.

6. 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: 12. July 2026

Location: Irving, TX