

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

Brian P. Carr, Rueangrong Carr, and Buakhao Von Kramer Plaintiffs 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 Defendants	Civil No. 3-23CV2875 - S  Certificate of Conference
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**Certificate of Conference**

**Apology For Delay in Conference**

The plaintiffs apologize to the court and the defendants for the failure to consult with defendants' attorney (USATXN) before filing the Motion to Amend Complaint on 28 Mar 2024 as required by the Court's Local Civil Rule LR 7.1.

The omission was unintentional and was caused by the desire to respond to the Defendants' Motion to Dismiss in a timely fashion (by 29 Mar 2024). The Plaintiffs also believed that Amended Complaint had only minor changes (no new Plaintiffs, Defendants, relief or even allegations). It had only:

- typographical and clerical corrections (e.g. correct addresses for two plaintiffs to achieve proper service),
- changes to conform to evidence (from redacted affirmations prepared after the complaint was submitted, see Doc 12-4 which is a redacted version of

the affirmations referred to in Complaint (Doc 11-1 and 18-2) para 89.

- minor additions of citations and statutes to correct omissions identified by the Defendants in their Motion to Dismiss. See Doc 18-2 para 9 and 147 and Relief 20.

As such it was well supported by FRCP Rule 15(a)(1)(B) (being timely and within 21 days of Defendants Motion to Dismiss) and did not require any consent.

Conference Held on 2 Apr 2024  
Motion to Amend Complaint Uncontested

The USATXN contacted Mr. Carr on 2 Apr 2024 and conferred with the conclusion the Plaintiffs' have "the federal government's written consent to file an amended complaint ... which should moot all pending motions."

The Defendants continued to request that the Plaintiffs file a new Motion to Amend Complaint under FRCP Rule 15(a)(2) while the Plaintiffs believe that the current Motion to Amend Complaint under FRCP Rule 15(a)(1)(B) was timely and did not require Defendants' consent.

No Agreement to Extend Time to Answer Amended Complaint  
or Other Motion

It appears that the Defendants consent to a Motion to Amend Complaint is intended to withdraw their Motion to Dismiss so that it need not be considered further (and is now moot by their acceptance of the new Amended Complaint Doc

18-2).

However, the Plaintiffs do not believe that their Motion for Partial Summary Judgment is rendered moot by the acceptance of the Motion to Amend the Complaint as the two motions were submitted contemporaneously in the same document. Submitting new identical motions would only confuse the record.

Resubmitting the same identical motions would also 'reset the clock' for the Defendants Answer which the Plaintiff contest.

Further, USATXN requested that the Plaintiffs agree to allowing the Defendants 30 days to Answer the Amended Complaint, but the Plaintiffs did not agree to such an extension from the standard 14 days.

#### Time Critical Issues Should Not Be Delayed

At this time Mrs. Carr has no document to prove that she is not an illegal alien as shown in:

- Doc20-1 AirGCexp20201113redacted.pdf, a redacted copy of Mrs. Carr's green card which 'expired' on 13 Nov 2020.
- Doc 18-6 USCIS green card extension letter which 'expired' on 13 Nov 2022 (referred to in Complaint (Doc 11-1 and 18-1) para 147 and 152 when Mrs. Carr was stranded in Thailand).
- Doc 20-2 RCi-551exp20240102.pdf Copy of temporary I-551 Stamp in passport 'evidencing permanent residency' which lists expiration date of 2 Jan 2024. An interesting legal question is whether this I-551 expired on 31

Jan 2023 when the I-751 was adjudicated (no longer pending).

In light of pending Texas Senate Bill Four (SB4 2024) and a current Presidential Candidate's promise to deport millions of illegal aliens on 'day one', it is essential that all legal Asian and Hispanic Texas residents have clear proof that they are here legally or they risk deportation without due process.

Such time critical issues are addressed in Plaintiffs' Motion for Partial Summary Judgment which should not be needlessly delayed.

#### Defendants Expected Motion for Additional Time to Answer Contested

It is expected that after the filing of this Certificate of Conference the Defendants will file a motion requesting 30 days from 5 Apr 2024 to Answer the Amended Complaint.

The conference completed on 2 Apr 2024 should qualify as a conference where it was determined that the Plaintiffs intend to Contest any motion to delay until the relief sought in their Motion for Partial Summary Judgment is granted in full.

At that time the Plaintiffs are comfortable with a much more leisurely consideration of the numerous interesting legal questions which can be addressed in this relatively complex case.

Respectfully submitted,

### Verification of Certificate

We the undersigned Plaintiffs hereby affirm under penalty of perjury in both the United States and Thailand that as individuals:

1. I have reviewed the above certificate and believe all of the allegations 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*

*/s Air Carr*

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Brian P. Carr  
1201 Brady Dr  
Irving, TX 75061  
Date: 5 Apr 2024  
Location: Irving, TX

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Rueangrong Carr  
1201 Brady Dr  
Irving, TX 75061  
Date: 5 Apr 2024  
Location: Irving, TX

*/s Buakhao Von Kramer*

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Buakhao Von Kramer  
105 - 3 M 5 T YANGNERNG  
SARAPEE, CHIANG MAI 50140 THAILAND  
Date: 5 Apr 2024  
Location: Irving, TX

CERTIFICATE OF SERVICE

On the recorded date of submission, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system 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 were enrolled in the court's electronic case filing (and service) system.

*/s Brian P. Carr*

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Brian P. Carr  
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Irving, TX 75061