

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

<p>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</p>	<p>Civil No. 3-23CV2875 - S Request to Expedite Decision on Second Motion to Amend (ECF 49) Certificate of Conference - OPPOSED</p>
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The prior five motions pending before this court have been pending since 13 Jun 2024, over six months ago while the original Complaint was filed on 29 Dec 2023, almost a year ago. The Plaintiffs understand that this court has a full case load and that this is a complex case that warrants careful consideration.

However, the Defendants did not raise any serious concerns or injustices against the Second Motion to Amend (MTA2, ECF 49) of 19 Nov 2024. In fact the MTA2 makes the court's task easier by correcting simple errors like two count 8's and no count 9, adding a table of contents, and adjusting the relief sought to note relief which has already been provided (10 year green card provided by USCIS in ECF 49-3).

Further, it is plausible that Mrs. Carr could receive her Certificate of Naturalization in the next couple of months (ECF 49-4) so that another Motion to Amend would be necessary to alleviate the court's obligation to decide issues which have become

moot (see Relief 20, ECF 49-1)

For these reasons the court is asked to expedite any decision on the MTA2.

Respectfully submitted,

Verification of Motion

The Plaintiff hereby affirms under penalty of perjury in both the United States and Thailand that as an individual:

1. I have reviewed the above motion 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 or other redactable information (as cited in the redaction) 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: 27. Dec. 2024

Location: Chiang Rai, Thailand

Certificate of Conference

The foregoing Motion is OPPOSED

In accordance with [Local Civil Rule LR 7.1](#) on 26 Dec 2024 I sent an email to opposing counsel concerning this motion and on the same date I received a response that the motion is OPPOSED.

/s Brian P. Carr

Brian P. Carr
1201 Brady Dr
Irving, TX 75061

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

Brian P. Carr
1201 Brady Dr
Irving, TX 75061