

**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

Verified¹ [FRCP Rule 60](#) Motion for Relief

Restricting Unredacted Document

(Redacted Replacement Document
Attached)

Certificate of Conference - UNOPPOSED

FRCP Rule 60 Motions for LR 7.1, LR 7.2, and LR 11.1 Relief

I must apologize to the court and other parties as I inadvertently filed a document, an appeal to the IRS concerning penalties (ECF 67-13), which contains personal identifying information which was not redacted. At my request, the clerk has ‘locked’ this document so that only parties to this matter can access the document. I have attached as the first exhibit a redacted version of this document which is suitable for public access.

I ask the court to direct the clerk to permanently lock ECF 67-13 so that only parties to this matter will be able to access the document and update the description of the document in ECF to include ‘UNREDACTED’. Further, I request that all other parties not distribute the unredacted document.

¹ The Verification of Motion is at the end of this document.

FRCP Rule 60 Motion for Restricting Document is Timely

FRCP Rule 60 states:

(1) Timing. A motion under Rule 60(b) must be made within a reasonable time - and for reasons (1), (2), and (3) no more than a year after the entry of the judgment or order or the date of the proceeding.

FRCP Rule 59 (Amending a Judgment after trial) has the most stringent requirement for filing a motion to alter an order with:

(b) Time to File a Motion for a New Trial. A motion for a new trial must be filed no later than 28 days after the entry of judgment.

This motion is within the required time FRCP Rule 59(b) which clearly is a reasonable time for a FRCP Rule 60 motion.

Further, this motion is filed within one day of my discovering my error.

Respectfully submitted,

Verification of Motion

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

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 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: 18. Apr. 2025

Location: Irving, Texas

Certificate of Conference

This Motion for Restrcting Access is UNOPPOSED

The conference was held via an email discussion with AUSA Owen on 18 Apr 2025 with her response of UNOPPOSED.

/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 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