

**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

Motion of the Plaintiffs
To Correct Clerical Errors
In the Captioning and Summons

Pursuant to Rule 4 and Rule 60a
of the FRCP

Pursuant to Federal Rule of Civil Procedure 4 and 60(a) Plaintiffs respectfully move seeking orders from the court:

1. To correct the tenth defendant in this matter from 'Department of Homeland Security' to 'Department of Homeland Security OIG'
2. To Correct the Summons entered on 2 Jan 2024 (document 5 in the record, pages 55, 57 and 59) specifying 'Department of Homeland Security' to instead specify 'Department of Homeland Security OIG'
3. Granting Plaintiffs 90 days from the date of the resolution of this motion to serve the summons and complaint on all Defendants.
4. for other and further relief as the Court deems just and proper.

Justification

1. The Complaint in this matter in its caption lists the tenth defendant as DHS OIG (document 3 in the record page 1) and describes the relevant defendant on page 7, paragraph 24 as:
The Department of Homeland Security (hereafter DHS) OIG is an agency of the United States which oversees USCIS, a Defendant in this matter and is represented by the DHS Inspector General in his professional capacity with contact information:

Department of Homeland Security Inspector General
245 Murray Dr.; Building 410;
Washington, DC 20528

2. While the meaning of the above text is not as clear as it could be, within the text of the Complaint it is clear that the Plaintiffs were describing the DHS OIG which oversees USCIS, the preceding Defendant.
3. The summons requested by the Plaintiffs in this matter (document 4 in the record, page 10) specified the Department of Homeland Security Inspector General as the head of the DHS OIG.
4. At this time no defendants have been served copies of the Complaint or Summons nor have they joined the matter.
5. Further, as there is only one real Defendant, the U.S. government, and all summons must be provided to the U.S. Attorney and U.S. Attorney General, the Plaintiffs are delaying service to all Defendants to minimize the confusion which would result from this clerical error.

Respectfully submitted,

/s Brian P. Carr

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/s Air Carr

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