

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

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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  Verified <sup>1</sup> <a href="#">FRCP Rule 60</a> Motions:  • To Strike ECF 77 and ECF 81 and • Notice of Corrected Filings  Certificate of Conference – UNOPPOSED
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**FRCP Rule 60 Motions To Strike ECF 77 and ECF 81 and  
Notice of Corrected Filings (ECF 76-1)**

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**Introduction**

These motions are submitted to correct errors in prior motion filings, the striking of

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<sup>1</sup> The Verification of Motion is listed in the Table Contents toward the end of this document.

two documents which were attempts to correct ECF 76-4 which had incorrect 'title' information as well as errors in the proposed Second Amended Complaint (ECF 76-1)

**Strike ECF 77 and ECF 81**

The court is asked to direct the clerk strike documents ECF 77 and ECF 81 which were intended to correct inadvertent mistakes in the 'title' of ECF 76-4. I apologize for the errors and any confusion which resulted, but it appears that my normal habitual procedure for verifying the accuracy in documents had a glitch for certain classes of errors delaying detection as well as correction. I hope to correct my verification process so that similar glitches are less common in the future. ECF 82 is the corrected document. Defendants do not oppose the striking of these documents.

**Notice of Corrected Filings (ECF 76-1)**

We are seeking to replace the previously proposed complaint (ECF 76-1) to cite the corrected document ECF 82 instead of the incorrect ECF 76-4 as well as correct a typographical error to cite 26 USC § 6331 instead of 8 USC § 6331 (which does not exist). The basis for these corrections is that the proposed complaint was verified which creates a moral, ethical, and, possibly, legal obligation to notify parties of such errors and attempt to correct the errors to limit the misunderstanding and confusion which would result from the inaccurate statements.

The Defendants stated:

You may reflect that Defendants oppose amending Plaintiff's previously proposed complaint. Defendants will not oppose a notice of correct to note the two above-referenced errors.

I interpret this to mean that the Defendants are not opposed to the correction of the errors cited above but remain opposed to the proposed 2<sup>nd</sup> Amended Complaint (whether corrected or not).

The court is asked to decide the current motion to amend the complaint (ECF 76) based on a proposed amended complaint of ECF 84-1 which incorporates these corrections rather than the previous ECF 76-1.

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*

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Brian P. Carr  
1201 Brady Dr  
Irving, TX 75061

Date: 7. October 2025

Location: Irving, TX

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## **Certificate of Conference**

These motions to strike ECF 77 and ECF 81 and the Notice of Corrected Filings (ECF 76-1) with corrections are UNOPPOSED.

The conference was held via an email discussion with AUSA Parker with the response from USATXN on 6 Oct 2025 as cited above with these motions being UNOPPOSED.

/s Brian P. Carr

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**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

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