

**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> Notice of Delay in Reply  
Supporting [FRCP Rule 11\(c\)\(2\)](#)  
Motion for Sanctions (ECF 79)

Certificate of Conference – UNOPPOSED

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**Notice of Delay in Reply Supporting ECF 79**

I had intended to file a single combined Reply to ECF 86 and ECF 87 (the two responses to the two Motions for Sanctions) on 3 Nov 2025, the Reply date for ECF 86 in accordance with LR 7.1(f). However, due to unforeseen circumstances I was not be able to meet that deadline. I apologize to the court and all other parties for any inconvenience, confusion or other detrimental effects from this delay.

When it was apparent that I could not meet the deadline, on 3 Nov 2025 I contacted AUSA Parker and explained the delay and assured her that the combined Reply will be submitted well before 12 Nov 2025 as required for ECF 87.

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<sup>1</sup> The Verification of Notice is at the end of this document.

She responded with:

Defendants will not oppose an extension of time until November 12th to file a reply brief.

I ask the court to forgive this violation of local court rules and give full consideration to the combined Reply when it is submitted before 12 Nov 2025.

Respectfully submitted,

### **Verification of Notice**

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

1. I have reviewed the above notice 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: 4. November 2025

Location: Irving, TX

### **Certificate of Conference**

This Notice of Delay is UNOPPOSED.

When it was apparent that I could not meet the deadline, on 3 Nov 2025 I contacted AUSA Parker and explained the delay and assured her that the combined Reply will be submitted well before 12 Nov 2025 as required for ECF 87.

She responded with:

Defendants will not oppose an extension of time until November 12th to file a reply brief.

As such, this Notice and request for court acceptance of the delayed Reply is considered UNOPPOSED.

/s Brian P. Carr

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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

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Brian P. Carr  
1201 Brady Dr  
Irving, TX 75061