

United States District Court  
for the Eastern District Of Missouri

TERRY LEE HINDS,

Plaintiff,

v.

“UNITED STATES” GOVERNMENT,

Defendant.

Case No. 4:17-CV-750-JAR

**United States’ Motion to Strike  
Filings or, in the Alternative, for an  
Extension of Time**

The United States moves, pursuant to Federal Rule of Civil Procedure 12(f), the Court to strike Plaintiff’s two sets of seven documents filed on June 14, 2017. The documents in the first set are titled “Plaintiff’s Hybrid Pleading #[1-7] Making a Conscientious Effort to Comply with the Court’s Orders Manifesting an Amended Complaint” and labelled “Revelation” 1 to 7. (ECF No. 44.) The documents in the second set are titled “Plaintiff’s Conscientious Effort to Comply with Court’s Orders to Manifest an Amended Complaint within a Religiosity of Facts” and labelled “Religiosity of Facts” 1 to 7. (ECF No. 45.) These filings do not comply with the Court’s Orders that Plaintiff file an amended complaint in compliance with Rule 8. They are not an amended complaint, as they state no claim for relief. But, even if the Court were to construe them as an amended complaint, they do not comply with Rule 8, and therefore Plaintiff has failed to satisfy the Court’s Orders. The Court should strike these filings.

If the event that the Court were to determine that Plaintiff’s filings satisfy Rule 8 and the Court’s Orders, the United States respectfully requests, pursuant to Rule 6(b)(1), a sixty-day extension of time in which to prepare and file a response to Plaintiff’s

fourteen filings, which together incorporate more than four hundred exhibits, totaling thousands of pages.

Dated: June 29, 2017

Respectfully submitted,

CARRIE COSTANTIN  
Acting United States Attorney

DAVID A. HUBBERT  
Acting Assistant Attorney General  
Tax Division

/s/ Gregory L. Mokodean  
GREGORY L. MOKODEAN  
Ohio Bar No. 0086880  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 7238  
Washington, DC 20044  
(202) 307-6554 (tel.)  
(202) 514-6770 (fax)  
Gregory.L.Mokodean@usdoj.gov  
Attorney for the United States

### CERTIFICATE OF SERVICE

I certify that on June 29, 2017, I filed this motion with the Court through the CM/ECF system and caused a copy to be mailed to:

Terry Lee Hinds  
438 Leicester Square Dr.  
Ballwin, MO 63021

/s/ Gregory L. Mokodean  
GREGORY L. MOKODEAN  
Ohio Bar No. 0086880  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 7238  
Washington, DC 20044  
(202) 307-6554 (tel.)  
(202) 514-6770 (fax)  
gregory.l.mokodean@usdoj.gov