

Exhibit U#29

(A/1): *The Bad faith in Crafty Bespeaks Defenses for Extension of time, inter alia*

STATEMENT OF THE ISSUES PRESENTED AND ASSIGNMENT OF ERRORS

ISSUE PRESENTED # I. (A/1)

Under the *free exercise clause* of the First Amendment or the precedent of *Thomas v. Review Bd., Ind. Empl. Sec. Div.*, 450 U.S. 707, 714 (1981), does the right of protected speech of religious beliefs and conscience prevail over the Defendants' *bespeak defenses*, unsupported by law or fact, thereby declaring "*Additionally, the June 14 Filings are incoherent and disorganized. Many of Plaintiff's allegations are incoherent.*"⁷ when Plaintiff was compelled by court order to form a *more secular message* for an "amended complaint" because judicial perception of the Plaintiff's particular belief or practice in question of religious beliefs was not acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection from an [OCV/Petition].

- Free Exercise Clause of the First Amendment to the United States Constitution
- *Cantwell v. Connecticut*, 310 U.S. 296, 304 (1940)
- *Thomas v. Review Bd., Ind. Empl. Sec. Div.*, 450 U.S. 707, 714 (1981)
- Religious Freedom Restoration Act ("RFRA") (42 U.S.C. § 2000bb et seq.)

ASSIGNMENT OF ERROR # I. (A/1.1)

Did the District Court err, as a matter of law, and/or a Federal Judge abuse her discretion when the Court allowed the Defendants to pass judgement on Plaintiff pure speech statements of religious beliefs, being debased as "*Additionally, the June 14 Filings are incoherent and disorganized. Many of Plaintiff's allegations are incoherent.*"⁷ presenting clear errors of law or fact, exhibiting a work of manifest injustice or by advancing misapplication or mistake of law?

ASSIGNMENT OF ERROR # I. (A/1.2)

Did the District Court err, as a matter of law, and/or a Federal Judge abuse her discretion when the Court failed to properly address Plaintiff's motions, opposition and request in (Doc. Nos. 53 & 54)

concerning the Defendants' *bespeak defenses*, unsupported by law or fact, and upholding the bad faith and Defendants' *doctrines of deception*, manifested by clear errors of law or fact, or exhibiting a work of manifest injustice or by advancing misapplication or mistake of law?

ASSIGNMENT OF ERROR # I. (A/1.3)

Did the District Court err, as a matter of law, and/or a Federal Judge abuse her discretion when the Court accepted Defendants' Rule 12(f) motion (Doc. No. 51) as a Rule 8 remedy of which "*is improper, or without legal foundation utilizing inapposite cases and should be stricken, or in the alternative, denied*" manifested by clear errors of law or fact, or exhibiting a work of manifest injustice or by advancing misapplication or mistake of law?

ISSUE PRESENTED # II. (A/1)

Under Fed. R. Civ. P., Rule 15(a)(3) which "provides all parties, including the United States, with only fourteen additional days in which to respond to an amended complaint" or of due process of law does a District Judge's decision and order supersede the conformity with requirement with Rule 15(a)(3) to manifest a clear error or advance the work of manifest injustice when the Court held the Plaintiff to the requirements of conformity under Fed. R. Civ. P., Rule 8 or the Defendants' crafty bespeak defenses presented the presence of bad faith on the part of the party seeking relief and prejudice to the adverse party through a motion for extension of time of 60 days to respond.

- *Schneckloth v. Bustamonte, 412 U.S. 218, 229 (1973)*
- *Grannis v. Ordean, 234 U.S. 385 (1914)*
- *Substantive Due Process Doctrine of the U.S. Supreme Court*
- Religious Freedom Restoration Act ("RFRA") (42 U.S.C. § 2000bb et seq.)
- Fed. R. Civ. P., Rule 15(a)(3)
- Fed. R. Civ. P., Rule 8

ASSIGNMENT OF ERROR # II. (A/1.1)

Did the District Court err, as a matter of law, and/or a Federal Judge abuse her discretion when the Court issued an order granting the Defendants the right “to file a responsive pleading within sixty (60) days of this Order”?

ASSIGNMENT OF ERROR # II. (A/1.2)

Did the District Court err, as a matter of law, and/or a Federal Judge abuse her discretion when the Court failed to complying with Fed. R. Civ. P., Rule 15(a)(3) requirement or by upholding the bad faith in *crafty bespeak defenses* or Defendants’ doctrines of deception, unsupported by law or fact?

ASSIGNMENT OF ERROR # II. (A/1.3)

Did the District Court err, as a matter of law, and/or a Federal Judge abuse her discretion when the Court failed to properly address Plaintiff’s motions, opposition, request for relief or brief in support thereof (Doc. Nos. 53, 54) with a single misleading statement or however designated as “other form of decision” postulating a legal position as “Plaintiff opposes the motion. ECF No. 54-1.”?

ISSUE PRESENTED # III. (A/1)

Under the due process of law of the 5th Amendment or with the Court precedent in *Schneckloth v. Bustamonte*, 412 U.S. 218, 229 (1973) does Defendants’ *crafty bespeak defenses* advanced by [July 11, 2017 Ruling] prevail for an extension of time or prevent due process of law by fail to address Plaintiff legal rights set forth in (Doc. Nos. 53 & 54) when “*it is the duty of courts to be watchful for the constitutional rights of the citizen and against any stealthy encroachments thereon*” or hold to the fundamental requisite of due process of law, is the opportunity to be heard.

- The *due process of law* provision of the Fifth Amendment, U.S. Constitution
- *Schneckloth v. Bustamonte*, 412 U.S. 218, 229 (1973)
- *Grannis v. Ordean*, 234 U.S. 385 (1914)

ASSIGNMENT OF ERROR # III. (A/1.1)

Did the District Court err, as a matter of law, and/or a Federal Judge abuse her discretion when the Court failed its duty to be *watchful for the constitutional rights of the citizen and against any stealthy encroachments thereon* or the Judge election not to consider the legal rights or duties of the Plaintiff's as addressed in his motions, requests or opposition set forth in (Doc. Nos. 53 & 54)?

ASSIGNMENT OF ERROR # III. (A/1.2)

Did the District Court err, as a matter of law, and/or a Federal Judge abuse her discretion when the Court accepted Defendants' *orphan brief* (Doc. No. 52) in support of a motion that *failed to incorporate* a "Memorandum in Support of United States' Motion to Strike Filings or, in the Alternative, for an Extension of Time" (Doc. No. 52)?

ASSIGNMENT OF ERROR # III. (A/1.3)

Did the District Court err, as a matter of law, and/or a Federal Judge abuse her discretion when the Court accepted Defendants' motion (Doc. No. 51) to Plaintiff surprise, "In the Eyes of Carrie Costantin, 'Respectfully submitted,'" a motion without proper notice of entry or her name represented on the docket sheet as legal counsel?