

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In the Matter of:	}	
	}	
TERRY LEE HINDS,	}	
<i>Pro se,</i>	}	
Plaintiff,	}	CIVIL ACTION
	}	FILE NUMBER: 4:17 - CV – 750 AGF
-Vs-	}	
	}	
“UNITED STATES” GOVERNMENT,	}	
	}	
Defendants.	}	

**PLAINTIFF’S REQUEST FOR LEAVE PURSUANT TO LOCAL RULE 7-4.01(C) TO
FILE A MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION OF THE
“REPLY IN SUPPORT OF UNITED STATES’ MOTION TO DISMISS”, Re: ECF No. 86**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, TERRY LEE HINDS, (“Plaintiff”) proceeding *pro se* hereby submits and request leave to file a memorandum of points and authorities in opposition of the “REPLY IN SUPPORT OF UNITED STATES’ MOTION TO DISMISS” re ECF. No. 86. This request is made pursuant to Local Rule 7-4.01(C), as well as, the U.S. Supreme Court’s prevailing precedents with a legal system manifesting *due process* and Plaintiff’s First Amendment rights to petition and protest the Defendants’ *unconstitutional activities* concerning this case and its controversies. Plaintiff states or shows the Court the following:

1). Plaintiff’s request for leave will *not prejudice* the Defendants, or its legal counsel of the Department of Justice (“DOJ”) for the following reasons:

A. The DOJ, should not be seen in the light as the “Department of Justification” *versus* its established role, which the DOJ has declared on its website “The most sacred of the duties of

government [is] to do equal and impartial justice to all its citizens.’’. Moreover, the DOJ declares: “This sacred duty remains the guiding principle for the women and men of the U.S. Department of Justice.” <https://www.justice.gov/about> Plaintiff has a *sacred duty*, as well as, the Nation’s DOJ. Plaintiff’s request for leave will not produce a prejudice because of these two avowed statements:

OUR MISSION STATEMENT

To enforce the law and defend the interests of the United States according to the law; to ensure public safety against threats foreign and domestic; to provide federal leadership in preventing and controlling crime; to seek just punishment for those guilty of unlawful behavior; and to ensure fair and impartial administration of justice for all Americans.

ABOUT THE DEPARTMENT

The Office of the Attorney General was created by the Judiciary Act of 1789 (ch. 20, sec. 35, 1 Stat. 73, 92-93), as a one-person part-time position.

A concerned Congress passed the Act to Establish the Department of Justice (ch. 150, 16 Stat. 162), creating "an executive department of the government of the United States" with the Attorney General as its head.

B. The DOJ has well over 10,000 lawyers and personnel to manage this constitutional case and its controversies. There is no burden on the DOJ, rather a duty or obligation to uphold the law.

C. The Plaintiff is proceeding *pro se*, without the skills on practicing law in the courtroom. Plaintiff needs additional time to respond and address issues on the subject matter in the DOJ’s “REPLY IN SUPPORT OF UNITED STATES’ MOTION TO DISMISS” re ECF. No. 86. Furthermore, Defendants’ legal positions are moot or frivolous for the reasons that shall be stated in Plaintiff’s memorandum of points and authorities. Plaintiff seeks legal precision in his liberties.

2). In the interest of justice, and to prevent the Court in making a uniformed decision or *advancing* the DOJ or Defendants’ *doctrine of deception* concerning this case and its controversies, the Plaintiff shall show the evidence, as well as, the established law that governs this case and the claims made therein. Case in point, the DOJ or the Defendants have relied upon law that is either *misleading* or advances a surreal legal position that would be troubling with U.S. Supreme Court

precedents or would destroy the very fabric in the rule of law or the vital threads “We the People” hold within the preamble of the United States Constitution. See Plaintiff’s Exhibits U#-39, U#-40 and D#-3 as set forth and attached hereto and incorporated by reference as if fully set forth herein.

3). Plaintiff was restricted by this Court local rules to limit his response to 15 pages and a signature page, when he first addressed the Defendants’ motion to dismiss, re 82. This restraint on Plaintiff’s First Amendment right to protest governmental activities concerning his constitutional liberties under law, placed an undue burden on guaranteed rights of the First Amendment. Simply, Plaintiff could not properly respond to or protest all the legal issues or points of law presented by Defendants, because of this local rule or limitation.

Therefore, the reasons set forth herein or in accordance with established law, U.S. Supreme Court precedents or to advance this Nation’s concept of *due process* while upholding Plaintiff’s *free exercise rights* as guaranteed by the First Amendment, thereby allowing for the Plaintiff’s “other pleading” or a *course of proceeding whatsoever*; proper leave TO FILE A MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION OF THE “REPLY IN SUPPORT OF UNITED STATES’ MOTION TO DISMISS”, Re: ECF No. 86. The Plaintiff respectfully request that (1) the Court grant permission for additional time of 30 days or until October 30, 2017 for Plaintiff to file his MEMORANDUM OF POINTS AND AUTHORITIES, and (2) allow the Plaintiff up to or no more than 30 pages to advance his legal positions or rights established by a MEMORANDUM OF POINTS AND AUTHORITIES or for such other relief as the Court deems proper.

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Respectfully submitted,

Executed this 29th day of September, 2017

TERRY LEE HINDS, Plaintiff, *Pro se*
438 Leicester Square Drive
Ballwin, Missouri 63021
PH (636) 675-0028

CERTIFICATE OF SERVICE AND DELIVERY

I hereby certify that the foregoing was filed this 29th day of September, 2017 and served upon Defendants and its U.S. Attorney, by First class postage prepaid, U.S. Certified mail # 7009-0960-0000-0249-6927 at the following address:

Gregory L. Mokodean
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 7238
Washington, D.C. 20044

Initials _____

Signatures of

TERRY LEE HINDS, *Pro se*, Plaintiff