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| <p>Brian P. Carr,<br/>Rueangrong Carr, and<br/>Buakhao Von Kramer<br/>we<br/>versus<br/>United States,<br/>US Department of Justice,<br/>USPS, USPS OIG,<br/>USPS BoG, US CIGIE,<br/>Department of State,<br/>Department of State OIG,<br/>USCIS, DHS OIG, and<br/>SSA<br/>Appellees</p> | <p>Case No. <b>26-10025</b></p> <p><b>Verified Motion to</b></p> <ul style="list-style-type: none"><li>• <b>Compel Action,</b></li><li>• <b>Reconsider and</b></li><li>• <b>Supplement the ROA</b></li></ul> <p>Certificate of Conference – OPPOSED</p> |
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easy access to a copy of the document, e.g. [ECF10-5](#) has link to an important exhibit which was provided previously.

If an adjudicator, opposing counsel, or a member of the public wishes to inspect a referenced docket entry, they can click the blue hyperlink to open the file and later easily return to the text of our argument.

### **I. Introduction**

We are requesting that a panel of judges provide relief with supplements to the ROA which:

- unseal [ROA20pgSealed](#) and [ROA67pgSealed](#) (133 pages, 25 documents) but strike ECF20-1 and ECF67-13 (2 documents, 2 pages) with unredacted PII
- correct two garbled exhibits in the ROA, [ECF10-9](#) and [ECF16-1](#),
- document TXND recent actions which unsealed [ROA20pgSealed](#) and [ROA67pgSealed](#) but did not strike ECF20-1 and ECF67-13 as requested.

We also seek an order that ECF20-1 and ECF67-13 be struck in TXND ECF as they have unredacted PII but are available for public access in TXND ECF at this time. There are replacement exhibits [ROA24-1pg573](#) and [ROA69-1pg1571](#).

There are four original motions seeking relief each of which have been deferred pending judicial review or denied under varied circumstances (last 3). They are:

- [5CC13](#) a motion to seal ECF20-1 and ECF67-13 with unredacted PII,
- [5CC26](#) a motion seeking to correct two garbled records in the ROA,
- [5CC32](#) a motion to strike a new ROA with ECF20-1 and ECF67-13, and
- [ECF97](#) a TXND motion to strike ECF20-1 and ECF67-13.