

MAY 21 2025

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

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

In the Matter of:

TERRY LEE HINDS,
Pro se & Suri Juris,
Officially a/k/a Terry Lee Hinds,

Real Party in Interest as Plaintiff/Petitioner, (“[P/P]”)

-Vs-

JOSEPH R. BIDEN, JR., *in his official capacity*
as the President of the United States of America; &
actions of the Government of the United States, and

DANIEL WERFEL, *in his official capacity*
as Commissioner of Internal Revenue Service, &/or
as Commissioner of Internal Revenue; via § 7803 &
actions of INTERNAL REVENUE SERVICE, IRS &

JANET YELLEN, *in her official capacity*
as Secretary of the United States Department
of the Treasury; & actions of the UNITED STATES
DEPARTMENT OF THE TREASURY, and

MERRICK B. GARLAND, *in his official capacity*
as Attorney General of the United States; & actions of
UNITED STATES DEPARTMENT OF JUSTICE

Defendants/Respondents/Interested Party. (“[D/R/I P]”)

} CIVIL ACTION

} FILE NUMBER:

} 4:25-CV-00047 AGF

[P/P]’s MOTION TO VACATE, SET ASIDE, CANCEL OR CORRECT LEGAL DEFECTS IN THE DECISION WITH [ECF No. 6] & IN THE COURT’S ORDER [ECF No. 7] PREMISED ON SUBSTANTIVE RULE, LAW, RIGHTS & GROUNDS

TO THE HONORABLE JUDGE OF SAID COURT & RELEVANT PARTIES:

COMES NOW, [P/P] for his Petition, Protest, Protected Speech (“[PPP]”) & pursuant to *procedural due process & substantive due process/rights/grounds* for [P/P]’s case of [PPP] & under FRCP Rule 7(b) and Rule 8(e) Construing Pleadings. Pleadings must

be construed so as to do justice with relief sought under Rule 1- Scope and Purpose thus employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding premised on the Supreme Court's decisions, doctrines/precedents for *procedural due process & substantive due process/rights/grounds* in: *Mathews v. Eldridge*, 424 U.S. 319 (1976) & *San Antonio Independent School District v. Rodriguez*, 411 U.S. 1 (1973) & *Fuentes v. Shevin*, 407 U.S. 67 (1972) & *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306 (1950) & *Washington v. Glucksberg*, 521 U.S. 702 (1997) & with Attorney AHSAN's specific conduct violated **Rule 11(b)**.

Thereby, [P/P] requests and moves the Court to Vacate, Set Aside, Cancel or Correct Legal Defects in the decision with [ECF No. 6] and in the Court's Order [ECF No. 7] granting relief requested & for reasons & [Rights] stated within:

MEMORANDUM IN SUPPORT OF [P/P]'s
MOTION TO VACATE, SET ASIDE, CANCEL OR CORRECT LEGAL
DEFECTS¹ IN THE DECISION WITH [ECF No. 6] & IN THE COURT'S ORDER
[ECF No. 7] PREMISED ON SUBSTANTIVE RULE, LAW, RIGHTS & GROUNDS

[P/P]'s submits the attached memorandum in support of this motion.

f.n. ¹ Reasons for Filing Motion:

Insufficient Legal Grounds: The moving document ECF Nos. 6 did not follow or has the necessary elements for non-consent motion violating Local Rule 4.01(A), requiring the moving party to "file with each motion a memorandum in support of the motion." The Court may deny the motion for this reason. *Indep. Cont'ors of Maverick Transp., LLC v. Great W. Cas. Co.*, 2025 WL 871635, at *15 (E.D. Mo. 2025) ("It is within the Court's authority to deny a motion for failure to submit an adequate memorandum in support . . .").

Invalidity: The documents ECF Nos. 6-7 have been issued improperly for a "Complaint" not for a "Petition" & did not comply with legal requirements with Court "Requirements" "2. Informal Matters". Also [P/P] did not grant or gave consent for an extension of time.

Unconstitutionality: The documents ECF Nos. 6-7 and its proceeding violates [P/P]'s constitutional rights, Importance of Fair Notice, & violating Procedural Due Process.

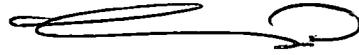
Legal Insufficient Arguments: See Exhibit BB#1
RE: [ECF No. 6] AS FACIALLY DEFECTIVE & PROCDURALLY IMPROPER.

Factual Insufficient See [ECF Nos. 9-10].

WHEREFORE, [P/P] respectfully requests that this Court enter a judgment & Order:

Pursuant to Judiciary Act of 1789, SEC. 32, this court respectively shall proceed and give judgment according as the right of the cause and matter in law shall appear unto them, without regarding any imperfections, defects, or want of form in such petition declaration, or other pleading, or course of proceeding whatsoever.

Signatures of



Dated the 20th day of May 2025

TERRY LEE HINDS,
Pro se & Suri Juris,
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CERTIFICATE OF SERVICE AND DELIVERY

I hereby certify that the foregoing was filed on this 20th day of May 2025 with the court, with a true and correct copy, served upon [D/R/I P] through their counsel for the defense, by First Class U.S. Mail, postage prepaid, at the following address and named attorney:

GREGORY L. MOKODEAN
DC Bar No. 1002890
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 7238
Washington, D.C. 20044
Telephone: (202) 307-6554
Fax: (202) 514-6770
Email: Gregory.L.Mokodean@usdoj.gov
Counsel for Defendants entry ECF No. 14
of Appearance on Thursday April 15, 2025

Initials 

Signatures of



Dated the 20th day of May 2025

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Note: Attorney Mollie Ahsan withdrawn from this case, stating leaving DOJ -ECF No. 17