Dear Pro Se Intake Clerk,

This submission is made solely to restore a previously stricken evidentiary filing to the docket **on the first permissible filing date following the Court's most recent filing injunction**. It is identical in content to ECF 476, which was stricken solely under that temporary restriction.

Re-filing is made pursuant to Fed. R. Civ. P. 60(b)(3), Rule 83(b), and Fed. R. App. P. 10(e) to preserve record continuity and ensure an accurate appellate record. This filing does not advance new argument or seek reconsideration.

The attached PDF is flattened and retains the original timestamp for authentication. Please confirm docketing under the title above.

Respectfully,
/s/ Albert Rojas
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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

MPHASIS CORPORATION,

Plaintiff,

v. Case No. 1:25-cv-03175 (JMF)(OTW)

ALBERT ROJAS,

Defendant.

NOTICE OF SUPPLEMENTAL RELIEF SOUGHT

(Rule 60(b)(3) – Request for Full Vacatur and Corrected Record)

Defendant Albert Rojas, appearing pro se, respectfully submits this Notice to supplement

his previously filed Supplemental Rule 60(b)(3) Memorandum (ECF 474).

In light of the record now before the Court, Defendant requests the following relief:

1. VACATE IN FULL the sanctions order (ECF 404) and any derivative rulings that relied on ECF 12 p.20 ¶2 (including compelled forensic imaging of a personal device);

2. ORDER WITHDRAWN the misrepresentation quoted at ECF 12 p.20 ¶2 and require Plaintiff to file a short corrected statement on the docket;

3. DIRECT THE CLERK to annotate the docket so the public record is clear, by:

a. marking ECF 404 “VACATED,” and

b. adding a docket note that vacatur is based on misrepresentation identified under Rule 60(b)(3);

4. REPAY/REIMBURSE to Defendant any amounts paid or assessed under ECF 404 and tax against Plaintiff Defendant’s reasonable, documented out-of-pocket costs caused by the misstatement (pro se—no attorney’s fees);

5. ISSUE ANY FURTHER RELIEF the Court deems just to restore the accuracy of the record and prevent recurrence, including referral under the Court's inherent authority and Local Civil Rule 1.5 if appropriate.

6. In the alternative, or in addition to vacatur, the Court should **impose a compensatory sanction equal to the $9,194.41 previously assessed against Defendant**, payable by Plaintiff, to offset the prejudice caused by Plaintiff's misrepresentation and the resulting compelled forensic order. The requested sanction would serve both to **restore parity** and to **deter future misconduct**, consistent with the Court's inherent authority to remedy bad faith litigation conduct and to preserve the integrity of its proceedings. *See Chambers v. NASCO, Inc.*, 501 U.S. 32, 44–46 (1991).

Respectfully submitted,

/s/ Albert Rojas

Albert Rojas (Pro Se Defendant)

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Dated: October 22, 2025