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☐ Plaintiff ☐ Plaintiff's Attorney (Utah Bar: _____)

☐ Defendant ☐ Defendant's Attorney (Utah Bar: _____)

 IN THE DISTRICT COURT OF UTAH
_____ Judicial District _____ County
 Court Address

<p>_____</p> <p>Plaintiff</p> <p>_____</p> <p>Defendant</p>	<p>EX PARTE MEMORANDUM: PRO SE LITIGANT ACCOMMODATION ARGUMENTS</p> <p>Hearing Requested <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>_____</p> <p>Case Number</p> <p>_____</p> <p>Judge</p> <p>_____</p> <p>Commissioner</p>
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I. INTRODUCTION

Plaintiff submits this ex parte memorandum addressing how well-established principles regarding pro se litigant accommodation mandate immediate judicial

intervention in this case. This memorandum is submitted ex parte due to the time-sensitive religious obligations that cannot withstand further procedural delay.

II. SUPREME COURT PRECEDENT REQUIRING LIBERAL CONSTRUCTION

The Supreme Court has consistently held that pro se litigants' pleadings must be held to "less stringent standards than formal pleadings drafted by lawyers." *Haines v. Kerner*, 404 U.S. 519, 520-21 (1972). The Court reaffirmed this principle in *Erickson v. Pardus*, 551 U.S. 89, 94 (2007), emphasizing that pro se complaints "however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers."

This standard requires courts to focus on the substance rather than form of pro se filings and to overlook technical deficiencies in favor of addressing the underlying substantive claims. As the Tenth Circuit has recognized, "a pro se litigant's pleadings are to be construed liberally and held to a less stringent standard than formal pleadings drafted by lawyers." *Hall v. Bellmon*, 935 F.2d 1106, 1110 (10th Cir. 1991).

III. PRO SE RELIGIOUS LIBERTY CLAIMS DESERVE HEIGHTENED ACCOMMODATION

When pro se status intersects with religious liberty claims, courts must be particularly vigilant in ensuring meaningful access to justice. The fundamental importance of religious liberty in our constitutional system, combined with the recognized challenges facing pro se litigants, creates a special duty of accommodation.

As the Supreme Court recognized in *Bounds v. Smith*, 430 U.S. 817, 821 (1977), "meaningful access to the courts is a fundamental constitutional right." This right takes on heightened significance when the underlying claim involves religious liberty protections under the First Amendment and RFRA.

The District of Utah recently recognized this principle in *Singularism v. Provo City* (D. Utah, February 20, 2025), holding that when pro se litigants raise religious freedom claims, courts must take special care to ensure procedural requirements do not become barriers to substantive justice: "For that guarantee of religious liberty to

mean anything, the laws must protect unfamiliar religions equally with familiar ones, both in design and in practice."

IV. UNIQUE CHALLENGES FACING PRO SE RELIGIOUS LITIGANTS

Plaintiff faces extraordinary challenges as a pro se religious litigant seeking to vindicate fundamental rights against the sitting President of the United States. The complexity of effectuating service on a heavily-protected federal official, the technical requirements of federal civil procedure, and the urgent religious timeline established in The Black Flag's religious texts create a perfect storm that threatens to deny meaningful access to justice.

The Supreme Court has recognized that courts may need to make special accommodations in such extraordinary circumstances. See *Houston v. Lack*, 487 U.S. 266, 270 (1988) (creating the "prison mailbox rule" to accommodate the unique challenges facing prisoner pro se litigants). Similar accommodation is warranted here, where the sitting President is uniquely positioned to evade standard service procedures while benefiting from procedural technicalities.

V. CONCLUSION

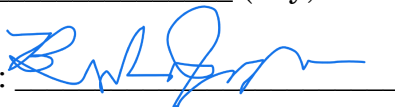
For the foregoing reasons, this Court should liberally construe Plaintiff's filings, overlook any technical deficiencies in service or procedure, and grant Plaintiff's Motion for Default Judgment to ensure meaningful access to justice for a pro se religious litigant facing extraordinary circumstances.

Respectfully submitted,

/s/ Brandon Michael Jeanpierre
Brandon Michael Jeanpierre, Pro Se Plaintiff

I declare under criminal penalty under the law of Utah that everything stated in this document is true.

Signed at: _____ (city, and state or county).

Date: _____ Signature: 

Printed Name: _____