MOTION FOR PROTECTIVE ORDER AND PERSONAL SAFETY PROVISIONS

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

(WEST PALM BEACH DIVISION)

ROGERIO SCOTTON,

Owner of Legal Help 4 You LLC, individually and as an advocate and human rights whistleblower,

Plaintiff,

CASE NO: 9:25-CV-809-RMM

VS.

ALEXANDRE DE MORAES,

Minister of the Supreme Federal Court of Brazil,

Defendant,

PLAINTIFF'S MOTION FOR LEAVE TO FILE
AMENDED COMPLAINT DUE TO INADVERTENT

FILING DEFECT

NOW COMES the Plaintiff, Rogerio Scotton, appearing pro se and as founder of Legal Help 4 You LLC, respectfully requesting leave of this Honorable Court to file an amended complaint pursuant to Fed. R. Civ. P. 15(a)(2), and states as follows:

In the matter of Rogerio Scotton vs. Alexandre Morais

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On August 5, 2025, Plaintiff filed the initial Complaint for Violations of International Human Rights and Petition for Declaratory Relief.

Due to an inadvertent technical error during the final assembly and upload of the PDF document, pages 7 through 21 were unintentionally omitted from the filed version of the Complaint.

This omission was not intentional and was only discovered after final submission and docketing.

The omitted pages contain critical legal claims, factual allegations, and statutory foundations that are essential for the full and fair presentation of Plaintiff's case.

Plaintiff now seeks leave to file a corrected, complete version of the complaint, attached hereto as Exhibit A, to replace the previously filed incomplete version.

This request is made in good faith and will not cause any undue delay or prejudice, as service has not yet been completed or answered by the Defendant.

Courts favor amendments in the early stages of litigation where justice so requires.

See <u>Foman v. Davis, 371 U.S. 178 (1962)</u>; <u>Dussouy v. Gulf Coast Inv. Corp., 660</u> <u>F.2d 594 (5th Cir. 1981)</u>. In the matter of Rogerio Scotton vs. Alexandre Morais

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WHEREFORE, Plaintiff respectfully requests this Court:

a) Grant leave to file an amended complaint curing the inadvertent omission of pages

7 through 21;

b) Direct the Clerk to replace the original complaint with the corrected and complete

version attached as Exhibit A;

c) And grant such further relief as this Court deems just and proper.

Rogerio Scotton

160 W Camino Real # 102

Boca Raton, FL 33432

info@legalhelp4y.com

CERTIFICATE OF SERVICE

I hereby certify that, on August 5, 2025, I filed the foregoing Motion for Protective Order and Personal Safety Provisions with the United States District Court for the Southern District of Florida – West Palm Beach Division. I further certify that I am commencing lawful service of process upon the Defendant and appropriate government entities as detailed below:

Defendant: Justice Alexandre de Moraes

(In official and personal capacity)

Supreme Federal Court of Brazil (STF)

Praça dos Três Poderes – Brasília – DF, 70175-900, Brazil

Service Method(s):

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- Courtesy electronic service via diplomatic email channels (pending formal service pursuant to Rule 4(f)(1) or (2))
- Anticipated formal service via legal representative in Brazil pursuant to Rule 4(f)(3)
- Notice of lawsuit and summons delivery via Certified International Mail
- 2. Courtesy Notification via Email:

Brazilian Attorney General's Office (Advocacia-Geral da União)

Email: gabinete@agu.gov.br

STF Secretariat or Communication Office (Legal/Diplomatic Inquiries)

Email: secretaria@stf.jus.br

3. U.S. Government Notice – Human Rights Violations

U.S. Department of State - Bureau of Democracy, Human Rights and Labor

Email: DRL-PublicAffairs@state.gov

U.S. Department of Justice – Human Rights & Special Prosecutions Section

Email: hrsp.tip@usdoj.gov

U.S. Department of Treasury – Office of Foreign Assets Control (OFAC)

Email: OFAC feedback@treasury.gov

U.S. Embassy – Brasília, Brazil

Email: BrasiliaACS@state.gov

4. Court Notification – Filing Confirmation

Rogerio Scotton

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Boca Raton, FL 33432

info@legalhlep4y.com