

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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Plaintiff,

v.

Attorney General Merrick Garland;  
Chief Justice John Roberts Jr.,  
Secretary General of the United Nations;  
et al in their capacity

Defendant,

**Civil No: 1:24-cv-00479-RC**

**PLAINTIFF'S OBJECTION TO THE ORDER TO SET/RESET DEADLINES**

Plaintiff, Rev. Dr. Christina Clement, respectfully submits this objection to the Court's recent order setting or resetting deadlines to October 18, 2024, in response to the Court's Show Cause Order. For the reasons detailed below, Plaintiff asserts that this new deadline is unnecessary and should be reconsidered based on the following:

**1. Response to Show Cause Filed**

On September 20, 2024, Plaintiff timely filed a comprehensive response to the Court's Show Cause Order. This filing is clearly referenced in ECF 76, specifically Exhibit 76-3, which includes all relevant documentation addressing the Court's concerns, clarifying any outstanding questions. Upon review of this submission, the Court will be in a better position to issue its final decision on the pending motions without the need for further extensions.

**2. Clarification for Granting of Default Judgment**

The Response to Show Cause thoroughly addresses all aspects necessary for the Court to rule on Plaintiff's previously filed Motion for Default Judgment, Writ, and Bill of Costs. This response provides sufficient legal reasoning and factual support to assist the Court in making its final decision. The requested extensions would only cause undue delay in a case that is ripe for judgment.

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**OCT 6 2024**

Clerk, U.S. District & Bankruptcy  
Court for the District of Columbia

Under Federal Rule of Civil Procedure 55(b), where a party has failed to plead or defend, and that failure is shown by affidavit or otherwise, the Court should enter default judgment. The Plaintiff has complied with all required steps, and further extensions are unwarranted.

### 3. Electronic Case Filing System (ECF) Documentation:

While Plaintiff is unable to reference specific portions of the Court-stamped documents due to illegible stamps, all pertinent filings, including the Response to Show Cause, are available and accessible in ECF 76. Plaintiff urges the Court to review these filings, which contain all necessary details to clarify the questions the Court may have, and believes the filings are complete for the Court's decision-making.

### 4. Legal Grounds for Objection

#### a. Case Law Supporting Prompt Default Judgment

- Butler v. Pearson, 2016 WL 9273472 (D.D.C.): This case reinforces the principle that when a defendant fails to defend a claim, the court should enter default judgment without unnecessary delays. Given the Defendant's failure to act, the case is ripe for judgment.

- Hunt v. Inter-Globe Energy, Inc., 770 F.2d 145 (D.C. Cir. 1985): The D.C. Circuit Court ruled that default judgment is appropriate when a party has failed to defend. This case highlights the need for timely resolution once procedural requirements are met, as they are in this instance.

- Jackson v. Beech, 636 F.2d 831 (D.C. Cir. 1980): This case affirms the right of a plaintiff to a default judgment when the defendant fails to properly plead or defend. Plaintiff has complied, and further delay only serves to impede justice.

#### b. Constitutional Protections

- Fifth Amendment Due Process Clause: The Fifth Amendment guarantees procedural fairness. Unnecessary extensions delay Plaintiff's right to a fair and timely resolution of the case. Delaying the court's ruling without good cause may infringe upon the due process rights of the Plaintiff.

- Seventh Amendment Right to a Speedy Trial: While primarily applied in criminal law, this principle can extend to civil matters when undue delay would prejudice one party. A delayed decision undermines Plaintiff's right to a prompt resolution, especially after compliance with all court directives.

#### c. Statutory Provisions

- 28 U.S.C. § 1657: This statute provides that federal courts should expedite cases when there is "good cause," particularly in civil rights and other matters where justice would be compromised

by delay. Given the gravity of Plaintiff's claims, extending deadlines would unduly delay justice in this matter, contravening the goals of judicial efficiency.

- Civil Rights Act of 1964: If the claims involve civil rights violations, further delay would exacerbate the harm done by continued infringement on these rights. The purpose of the Act is to provide timely justice and protection from discrimination, and unnecessary delays work against this goal.

**d. D.C. Circuit Precedent on Procedural Delays**

- *Ciralsky v. CIA*, 355 F.3d 661 (D.C. Cir. 2004): The D.C. Circuit ruled that unnecessary procedural delays should be avoided, particularly when they serve to frustrate timely justice. This case supports the argument that the court should not reset deadlines unnecessarily when the record is complete.

- *Dameron v. Washington Magazine, Inc.*, 779 F.2d 736 (D.C. Cir. 1985): The court held that procedural delays can be challenged when they unjustifiably deny a party's rights. The Plaintiff's right to a timely resolution is at risk with the resetting of deadlines, and further postponement is unjustified.

**e. Public Policy Considerations**

- Justice Delayed is Justice Denied: This legal principle has been widely recognized in both federal and state courts. In civil litigation, where parties have met all procedural requirements, delaying final decisions hinders justice. Plaintiff has filed all necessary documents and is entitled to a ruling without further delay.

**5. Conclusion**

The Plaintiff has provided all necessary information and has fully complied with the Court's Show Cause Order as filed in ECF 76. Further delays in this matter are unwarranted and would only serve to deny justice to the Plaintiff. Based on the Federal Rules of Civil Procedure, relevant case law, constitutional principles, and statutory provisions, Plaintiff respectfully requests that the Court vacate its order resetting deadlines to October 18, 2024, and proceed with a ruling on the pending motions for Default Judgment, Writ, and Bill of Costs in plaintiffs favor.

**REQUEST FOR RELIEF**

For the foregoing reasons, Plaintiff respectfully requests that the Court:

1. Vacate its order resetting the deadlines.
2. Proceed with issuing a decision on the Motion for Default Judgment, Writ, and Bill of Costs based on the submitted filings in favor of the plaintiff. Thank you.

Respectfully submitted,

Thank you for your attention to this matter.

A handwritten signature in blue ink, appearing to read 'C. Clement', with a horizontal line extending to the right.

Rev. Dr. Christina Clement, Presidential Candidate of the US 2024  
8 The Green, Suite A

Dover, DE 19901

678-780-5557

Rule 5 (c) Signing. A filing made through a person's electronic –filing account and authorized by that person, together with that person's name on a signature block, constitutes the person's signature.

<b>CERTIFICATE OF SERVICE</b>
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- I hereby certify that on October 06, 2024, I electronically emailed the foregoing with the Clerk of the Court using the email address dcd\_intake@dcd.uscourts.gov, which clerk will send notice to all parties  
"CHRISTINA CLEMENT, PM