

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Southern Division**

**MARVIN TUTT,  
Plaintiff,**

**Civil Action No. 8:25-cv-02006-TDC**

**v.**

**REGINA ROBINSON  
CHARLES COUNTY CHILD SUPPORT ADMINISTRATION  
CHARLES COUNTY DEPARTMENT OF SOCIAL SERVICES  
CHARLES COUNTY, MARYLAND  
STATE OF MARYLAND  
SHARA GABRIELLE HENDLER, ESQ.  
ANDREA KHOURY  
MISTEY L. METZGAR  
1-30 Jane/John Does And/Or Entities  
THEODORE D. CHUANG**

**Defendants.**

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# EMERGENCY MOTION FOR EXPEDITED DISCOVERY REGARDING COPYRIGHT  
INFRINGEMENT AND WITNESS PRESERVATION

**\*\*IN THE UNITED STATES DISTRICT COURT\*\***

**\*\*FOR THE DISTRICT OF MARYLAND\*\***

**\*\*MARVIN TUTT\*\***

**\*Plaintiff,\***

**v.**

**\*\*STATE OF MARYLAND, et al.\*\***

**\*Defendants.\***

**\*\*Case No.: 8:25-cv-02006-TDC\*\***

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## **## EMERGENCY MOTION FOR EXPEDITED DISCOVERY**

Plaintiff Marvin Tutt respectfully moves for expedited discovery based on: (1) imminent loss of witnesses due to August 4 buyouts; and (2) ongoing copyright infringement requiring immediate investigation.

### **## I. DUAL EMERGENCIES REQUIRE IMMEDIATE DISCOVERY**

#### **### A. Witness Buyout Deadline: August 4, 2025**

Governor Moore announced employee buyouts immediately after this lawsuit was filed. Key witnesses are disappearing through financial inducement, creating urgency for depositions.

#### **### B. Ongoing Copyright Infringement**

Defendants are actively accessing and using Plaintiff's copyrighted work at theburden.org without licenses, requiring immediate discovery of:

- Access logs before deletion

- Internal distribution patterns
- Strategic discussions about the work
- Financial benefit from infringement

## ## II. COPYRIGHT INFRINGEMENT DISCOVERY NEEDED

### ### A. Evidence of Systematic Theft

Cloudflare and GitHub analytics show Maryland government agencies accessing "The Burden" without purchasing required \$10,000 state government licenses. This includes:

- Attorney General's office
- Department of Social Services
- Child Support Administration
- State's attorneys
- Contract counsel

### ### B. Willful Nature Requires Broad Discovery

Defendants ignored prominent licensing requirements while prosecuting Plaintiff, showing consciousness of wrongdoing requiring discovery of:

#### \*\*1. Access and Distribution:\*\*

- Server logs from all agencies
- Download records
- Print/distribution logs

- Session duration data
- IP address records

**\*\*2. Strategic Discussions:\*\***

- Emails mentioning "The Burden"
- Discussions of "theburden.org"
- References to "Marvin Tutt" as author
- "Caia Tech" mentions
- "Civil Rights Engineer" references

**\*\*3. Use in Litigation:\*\***

- How copyright work informed strategy
- Pattern recognition techniques adopted
- Systems thinking methodologies used
- Documentation approaches copied
- Trauma processing insights exploited

**\*\*4. Financial Benefit:\*\***

- Avoided licensing costs
- Training value received
- Strategic advantages gained
- Litigation benefits obtained

### ## III. SPECIFIC DISCOVERY REQUESTS

#### ### A. Document Requests (Expedited)

##### \*\*1. Within 72 Hours - Preservation Confirmation:\*\*

- Written confirmation of litigation hold
- List of custodians notified
- Systems being preserved

##### \*\*2. Within 7 Days - Access Logs:\*\*

- All server logs showing theburden.org access
- Firewall logs with timestamps
- Proxy server records
- Individual device histories

##### \*\*3. Within 14 Days - Communications:\*\*

ALL communications from January 1, 2024 mentioning:

- "The Burden" (book or concept)
- "theburden.org" (domain)
- "Marvin Tutt" + "book" or "author"
- "Caia Tech"
- "Civil Rights Engineer"
- "Pattern recognition" + litigation

- "Systems thinking" + strategy
- Copyright/licensing discussions
- Surveillance of domain/author

**\*\*4. Within 21 Days - Strategic Materials:\*\***

- Litigation strategy documents referencing concepts from The Burden
- Training materials incorporating content
- Internal memoranda about the work
- Derivative works created
- Financial benefit analyses

**### B. Interrogatories (Priority)**

1. Identify all individuals who accessed theburden.org from your agency
2. State the purpose of each access
3. Describe all content downloaded or printed
4. Identify all internal distribution
5. Calculate financial value received
6. Admit/deny knowledge of licensing requirements
7. Explain decision not to purchase licenses
8. Describe use in Tutt litigation
9. Identify all derivative works created
10. State all benefits obtained

#### ### C. Depositions (By August 1)

##### \*\*Priority Witnesses:\*\*

1. IT administrators with log access
2. Legal counsel who accessed the work
3. Strategic planners using content
4. Training coordinators
5. Procurement officers who ignored licensing

#### ## IV. LEGAL STANDARD SATISFIED

##### ### A. Good Cause Exists

- Witnesses accepting buyouts by August 4
- Evidence being deleted (routine log purging)
- Ongoing daily infringement
- Willful violation of federal law

##### ### B. Relevance to Claims

- Copyright infringement (new federal claim)
- Pattern of taking Plaintiff's property
- Bad faith and malice
- Damages calculation

### ### C. Proportionality

Discovery sought is narrowly tailored to:

- Preserve disappearing evidence
- Document ongoing violations
- Calculate damages
- Prevent further infringement

### ## V. RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests this Court:

1. **\*\*GRANT expedited discovery\*\*** as outlined above
2. **\*\*ORDER immediate preservation\*\*** of all evidence
3. **\*\*COMPEL production\*\*** on shortened timelines:
  - 72 hours: Preservation confirmation
  - 7 days: Access logs
  - 14 days: Communications
  - 21 days: Strategic materials
4. **\*\*AUTHORIZE depositions\*\*** before August 1



5. **\*\*SANCTION spoliation\*\*** if evidence destroyed

6. **\*\*AWARD costs\*\*** for this motion

The confluence of witness buyouts and ongoing copyright theft creates extraordinary circumstances justifying immediate discovery.

**\*\*Respectfully submitted,\*\***

/s/ Marvin Tutt

Marvin Tutt

Pro Se Plaintiff

5407 Brinkley Road

Temple Hills, MD 20748

Email: owner@caiatech.com

**\*\*Date: July 15, 2025\*\***

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**## CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2025, I served this motion on all parties of record via certified mail and first-class mail to:

Charles County Child Support Administration

200 Kent Avenue

La Plata, MD 20646

Charles County Department of Social Services

200 Kent Avenue

La Plata, MD 20646

State of Maryland

c/o Office of the Attorney General

200 Saint Paul Place

Baltimore, MD 21202

Charles County, Maryland

200 Charles Street

La Plata, MD 20646

Shara Gabrielle Hendler, Esq.

c/o Charles County Child Support Administration

200 Kent Avenue

La Plata, MD 20646

Andrea Khoury

c/o Charles County Circuit Court

200 Charles Street

La Plata, MD 20646

Mistey L. Metzgar

c/o Charles County Circuit Court

200 Charles Street

La Plata, MD 20646

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Marvin Tutt

Marvin Tutt

Pro Se Plaintiff

Date: July 15, 2025\*\*