

NOTICE OF INTENT TO FILE MOTION TO MODIFY CASE MANAGEMENT ORDER

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

NOTICE OF INTENT TO FILE MOTION TO MODIFY CASE MANAGEMENT ORDER

Pursuant to the Case Management Order (ironically), Plaintiff provides notice of intent to file a Motion to Modify the discriminatory Case Management Order.

DISCRIMINATORY BURDEN ON PRO SE LITIGANT

The Order creates unconstitutional barriers by:

- Doubling procedural requirements for every motion
- Imposing conference requirements beyond Federal Rules
- Creating special restrictions absent any misconduct
- Treating Plaintiff as quasi-prisoner despite free citizen status

VIOLATION OF COURT ACCESS RIGHTS

The Supreme Court recognizes fundamental right of court access. The Order violates this by:

- Creating procedure not in Federal Rules
- Imposing burdens based on unrepresented status
- Requiring skills beyond pro se capability
- Multiplying costs for indigent litigant

NO LEGITIMATE BASIS

The Order was issued:

- Sua sponte without request
- Before any defendant appeared
- Without identifying any problem
- Creating system favoring prisoners over free citizens
- By conflicted judge

THE REVERSE DISCRIMINATION PROBLEM

Exception #7 EXEMPTS prisoners from these restrictions, yet Plaintiff—a non-prisoner—must follow them all. This reveals:

- Actual prisoners receive better treatment
- Free citizens face more barriers than incarcerated ones
- Inverted discrimination favoring prisoners
- Constitutional violation of equal protection

The Court has created a system where imprisoned individuals have greater access to justice than free citizens.

RELIEF TO BE SOUGHT

The Motion will request:

1. Strike all special restrictions
2. Apply standard Federal Rules
3. Remove prisoner references
4. Award fees for discriminatory treatment
5. Alternative: void Order entirely

****Respectfully submitted,****

/s/ Marvin Tutt

Marvin Tutt

Pro Se Plaintiff

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

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2025, I served a true and correct copy of the foregoing Notice of Intent to Seek Modification upon the following parties via certified mail and first-class mail:

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