Party Name Here (Omit name/contact in Proposed Orders)
1234 Party Party Street
Partytown, PT 00000
Phone: (202) 555-1234
Fax: (202) 555-0987
E-mail: Party1234@internet.party

WRITE THE COURT'S MAIN NAME HERE

AND THE COURT'S DISTRICT NAME HERE

MARK HEDGES,
    Plaintiff,
 	
    v.
 	
WORLD,
    in official capacity as Planet Earth;
DOES 1 … 100;
    Defendants
	Case No. 1234-567890
	
	PLEADING TEMPLATE;
	MEMORANDUM OF POINTS AND
	AUTHORITIES; VERIFICATION;
	DECLARATION IN SUPPORT
	THEREOF
	
	[For use in United States Federal District and State Trial Courts]

MAY THE WORLD TAKE NOTICE: WHYFORE groovyness, Typist **MARK HEDGES** publishes this **TEMPLATE**; for utterance of legal claims in Trial Courts.

MAY ALL WRITERS USING THIS TEMPLATE TAKE NOTICE, that no warranty of fitness of this Template for any purpose is implied or expressed. Writer assumes all risks of use. This Template is not a substitute for legal advice. This Template is licensed under the MIT License. © Copyright 2015 Mark Hedges.

WHEREBY, Typist hopes to ease the experience of *pro se* litigants who cannot afford to pay expensive commercial fees for operating systems and word processor applications.

WHEREAS, Typist releases this Template under the above terms.

DATED: April 14, 2015   Respectfully submitted,

s/Mark Hedges
Mark Hedges, Typist *in pro per*
1234 Party Party Street
Partytown, PT 00000
Phone: (202) 555-1234 / Fax: (202) 555-0987
E-mail: Party@internet.party

TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

TABLE OF CONTENTS

TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

TABLE OF AUTHORITIES

Not sure how to do reference table correctly yet. So far I have always formatted these by hand. Not sure if there is a better way to do this.

TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

COMPLAINT

1. If this document is not a Complaint, omit this section and its subsections.

2. If this document is a Complaint, skip the introductory section and signature above on the first page, or use a short introductory paragraph on the first page, like:

> Plaintiff *pro se* MARK HEDGES alleges the following complaint
> based on information and belief.

3. If you have many plaintiffs or defendants, you may have to list them all in the left caption box on the title page, or write "SEE PARTY LIST NEXT PAGE" there and write them all out on a subsequent page. Ask the court clerk what to do about that. Usually only the initial complaint requires all the parties listed on the caption page. After that, each document can usually list just the first Plaintiff and/or first Defendants' name, each followed by "ET AL" if there are multiple Plaintiffs or Defendants.

4. Normally a complaint would have a few sections, like the following paragraphs, which should be automatically numbered consecutively by using the "USTrialCt_NumberedParagraphs" style. LibreOffice can be a little touchy with consecutively numbered paragraphs. It may be a bug. Your mileage may vary.

I.   Jurisdiction

5. Foo bar.

II.   Venue

6. Foo bar.

III.   Parties

7. Foo bar.

IV.   Exhaustion of Administrative Remedy

8. Foo bar.

V.   __Factual Background__

   9. Foo bar.

  10. Baz qux.

VI.   __Claims__

__Claim 1__

__Violation of some law or right__

__(12345 U.S.C. § 67890)__

  11. In the "USTrialCtHeader3ClaimTitle" block above, for the title of the specific claim, use shift-enter after each line to keep the description and code citation as part of the same header line. That makes the whole Claim Title appear nicely in the Table of Contents as one entry.

__Claim 2__

__Violation of some law or right__

__(12345 U.S.C. § 67891)__

  12. Foo bar.

VII.   __Request for Relief__

  13. WHEREAS, Plaintiff requests the following relief:

1. Use this list to spell out the relief requested. This numbered list will not appear in the paragraph numbering, and it has different indentation.

    1.1   This is a test of the emergency broadcast system.

    1.2   This is a test of the emergency broadcast system.

VIII. __Conclusion__

  14. Some brief and pithy conclusion. Rock the house!

\\

\\

DATED: April 14, 2015   Respectfully submitted,

_____

_____, _____ *in pro per*
1234 Party Party Street
Partytown, PT 00000
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TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

DEMAND FOR JURY TRIAL

Plaintiff *pro se* requests a jury trial on all issues and claims raised in the foregoing complaint.

DATED: April 14, 2015   Respectfully submitted,

_____

_____, _____ *in pro per*
1234 Party Party Street
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MEMORANDUM OF POINTS AND AUTHORITIES

In all the text of a Memorandum of Points and Authorities, or the main body of the pleading itself as above, Writer would write about Writer in the third-person impersonal voice. Typist does not provide this as legal advice, but only as a formatting aide.

Take note, that some courts have rules that allow or require filing of Memoranda of Points and Authorities as separate documents. Ask the court clerk or local *pro se* legal clinic for more information on filing requirements for various types of documents.

I.   REQUIRED SOFTWARE

SHALL THE WRITER WISH, useth these Templates with LibreOffice Writer for Linux, Microsoft, or Apple.

I.a.   *Using Linux*

Linux from http://debian.org is free, with a business-friendly unrestrictive sharing license, provided the free library sources are included with their own terms in whatever one makes with them.

If you use Debian, use the **package manager** in the System Tools section of the main menu to install LibreOffice and LinuxLibertine fonts instead of downloading. Figure out how to search for those in the package manager. Most Linux flavors these days have package managers to install free software from the network.

I.b.   *Robbers on the Highway*

If thee payeth for thine operating system like a sheep, or steal it like a wolf, either way jumping through hoops at a circus, linketh to http://linuxlibertine.org to get the fonts, and http://libreoffice.org to download and install LibreOffice. Thou wasteth thy gold and time.

II.   **HOW TO GET THIS TEMPLATE**

II.a.   ***Using `git`***

The best way to use this template is by checking it out from GitHub. See the page at http://git-scm.com/downloads for a git client, if you do not use Linux like the cool kids. The git repository is at https://github.com/hedges333/libreoffice-court-templates. If you use git to keep your template up to date, you will get updates to the Template from the open source project. If styles or formatting changes, then when you open a document based on the template, LibreOffice will ask you if you want to update the document instance styles.

Linux terminal users can type the following to obtain the template:

```
git clone https://github.com/hedges333/libreoffice-court-templates.git
```

To update the template, do:

```
cd libreoffice-court-templates
git pull
```

II.b.   ***Using a web browser***

If you cannot use git, download the template from:

https://github.com/hedges333/libreoffice-court-templates/

Any time that you want to update, just download the new version and replace the old file.   The next time you open a document instance based on the template, LibreOffice should detect that the template has changed, and will ask you if you want to update styles. If you have already filed a given document, answer "No" to that prompt to keep it exactly the same as it was. If it is a work in progress, answer "Yes" to get style updates.

III.   **HELPFUL TIPS**

III.a.   ***Folder Names***

Typist usually creates folders for every year. Inside each of those, folders for every

TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

month labeled 01-January, 02-February, etc. so they sort. Inside each of those, folders for every court, named with the court acronym, like SCLA or CACD. (Superior Court for Los Angeles or California Central District. Inside each of the monthly court folders, sometimes just documents, or sometimes folders for documents that have to be joined from multiple parts, or require a working directory to assemble, like evidence compilations.

III.b.   *File Names*

If you save using the flat-text XML format extension ".fodt", it saves a text document instead of a binary file. The files are slightly bigger, but if you do that, then you can search all your files with a command like:

```
ack-grep -i -G '.*\.fodt$' 'Miranda v. Arizona'
```

Use that `ack-grep` command in a terminal window to see all the instances of that text. That command searches in all folders below the working directory. In Debian Linux, install the "ack-grep" package. Change the mouse settings to auto-copy selected text for mouse-paste with the Middle button or Right-Left button combo.

Typist encourages Writers to name each document in the format "CTNM-Party-DocTitle.fodt". Court name might be an abbreviation, like CACD for the California Central District.

When Writers finish a document, export a PDF with a file name dated for date of filing. Add the date year-first at the beginning, so the format for the PDF file is "YYYYMMDD-CTNM-Party-DocTitle.pdf". Your folders can sort alphabetically. Writing them with the year this way sorts the dated ones chronologically, separate from the named FODT documents.

III.c.   *Formatting in LibreOffice*

III.c.1.   *Changing the Font*

The default font, <u>Linux Biolinum O</u>, is ¼ serif, and looks best when printed on an ink jet printer. Writers who desire full serifs may modify the style "Default," on the style

TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

definition Font tab, to use the font <u>Linux Libertine O</u>, or any other font. Changing the "Default" style will change the font for all other styles. The normal text style for writing a paragraph is called "Text body". "Text body" inherits properties from "Default".

III.c.2.   <u>*Non-breaking Hyphens and Spaces*</u>

When writing names like people or companies, or legal code citations, or naturally hyphenated words that hang together, try using non-breaking spaces and hyphens. Make sure the full name or code reference appears all on the same line, for example, 42 U.S.C. § 1983, which normally would have broken. This is easier for judges to read.

III.c.3.   <u>*Signatures*</u>

Typist sometimes pastes a scanned copy of an original signature for electronic filing, electronic service, printing, and mail service. If a paper filing after mail service requires original signature, Typist signs with blue pen next to the scanned signature on the filed copy. It is all a copy Typist's signature. Recipients of mail service received a true and complete *copy* of the exact text of the document with *a copy* of Typist's signature. The one on the service copies is a copy of Typist's signature, regardless of the time applied. Typist applies at the time of generating the PDF for copies and verifies with the original signature when filing. This creates conveniently text-searchable PDF copies. Otherwise, courtesy and rules of court on text-searchable electronic copies cannot be fulfilled in any context where paper documents are required. That would force *pro se* parties into a horrendous amount more work to scan original signature pages back in for the record. But then the record would have errors, because then you have to duplicate the first page and all the signed pages interwoven with the text of the PDF files. Typist went down that road for hours with PDF command-line utilities and thinks it is absurd to set the technical bar so high that *pro se* parties cannot satisfy all the rules without jumping through hoops, looking like a mess, or having to hand-write everything. That would be unequal protection by punishing the poor for seeking justice. It would add economic barriers to the political and judicial process for those who have less, like a poll tax. It's all a copy of my signature.

Whatever looks best and is most usable for the format presented to Courts and different parties seems to Typist the best signature to use on the production of that copy of the document, as long as the exact text on the documents is identical in every instance of the same title and filing date. In the California Central District, no original signature is required for court, as long as you can produce a copy with an original signature when asked. Only the proof of service has to have an original signature for court. OK, I sign the one in the file drawer, it has my original signature, and all the copies still have a copy of my original signature. Then I can send PDFs e-mail to an attorney service firm to file. In the Los Angeles Superior Court, the original signature has to be filed, and signing alongside the filed copy has been accepted. It still seems like it forces *pro se* parties to spend a lot more money, as opposed to attorneys who can use the electronic systems. Typist is not a lawyer and cannot recommend what Writers should do on this point, but this has all been fine with courts so far.

III.d.   ***Pro Tools – Command-line utilities***

III.d.1.   Numbering Paragraphs in a Complaint

It would be nice if there were a macro to number paragraphs of a certain style but no others. Not sure how to do that.

III.d.2.   Compiling volumes of evidence

More to come on this subject.

IV.   COPYRIGHT AND LICENSE

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TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

IV.a.   *The MIT License (MIT)*

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DATED: April 14, 2015   Respectfully submitted,

_____

_____, _____ *in pro per*

1234 Party Party Street
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E-mail: Party1234@internet.party

TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

EXAMPLES, WITH A REALLY LONG HEADING TITLE SO THE LINE BREAKS IN THE TABLE OF CONTENTS

Normally Writer would insert a page break with Control-Enter before a Heading 1 title, which should be used to start a new section like "Memorandum of Points and Authorities" or "Declaration of Mark Hedges."

This is a test of the emergency broadcast system. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

I.   "Text body" paragraph

This is some text in a paragraph using the default "Text body" style.

If you want regular paragraphs numbered, use "USTrialCt_NumberedParagraphs" style. Don't use a list, else it messes up the indentation. See examples in the "Claims" part above. A claim is typically the only place to use numbered paragraphs, but refer to your court's rules, or ask the clerk or a pro se clinic to make sure.

I.a.   *Numbered List Example*

The following is a numbered list, with numbering type switched to use "1.1.1.1" type:

2. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

    2.1   This is a test of the emergency broadcast system. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

    2.2   This is a test of the emergency broadcast system. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

3. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

    3.1   This is a test of the emergency broadcast system. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

        3.1.1   This is a test of the emergency broadcast system. This is a test of

TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

the emergency broadcast system.

      3.1.1.1   This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

This is a "Text body" paragraph again. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

I.a.1. *Block Quotes*

This is a "Text body" paragraph. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

> This is a "Quotations" paragraph block. Don't worry about how it changes the alignment of other text with the line numbers. The line numbers on the left side are really just for reference.
>
> Typist recommends you do not use frames for quotations. Frames do not flow well across page boundaries, and LibreOffice will mix them all up. By using a Quotations paragraph block instead of a frame, quotations naturally flow across pages like normal Text body paragraphs.
>
> "Quotations" blocks require a blank line at the end of each block, since they might contain multiple paragraphs. Typist is not sure how to add extra space automatically after switching styles, without adding space between each paragraph inside the Quotations block.

This is a "Text body" paragraph.

II. Baz Qux This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

This is a test of the emergency broadcast system. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

II.a. *Noz Schnozz. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.*

This is a test of the emergency broadcast system. This is a test of the emergency

broadcast system. This is a test of the emergency broadcast system.

II.a.1.   *Kirk Spock Mccoy. This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.*

McCoy.   This is a test of the emergency broadcast system.   This is a test of the emergency broadcast system. This is a test of the emergency broadcast system.

III.   Heading 2 with long number

Foo

III.a.   Heading 3 – Headings must be long enough for TOC to tab

Foo

IV.   H2

Foo

IV.a.   H3

Foo

IV.a.1.   H4

Foo

IV.a.1.i.   H5

Foo

IV.a.1.ii.   Yup, they gotta be long enough. What's up with Heading 5?

Foo

IV.a.1.iii.   Here is a really long Heading 5 that goes around the line to see what the table of contents looks like

Foo

IV.a.2.   Heading 4

Foo

V.   **That's a Wrap**

This is a test of the emergency broadcast system.   This is a test of the emergency broadcast system.

DATED: April 14, 2015   Respectfully submitted,

_____

_____, _____ *in pro per*
1234 Party Party Street
Partytown, PT 12345
Phone: (202) 555-1234
Fax: (202) 555-0987
E-mail: Party1234@internet.party

VERIFICATION

My name is _____. I am _____ (plaintiff or defendant)

pro se in the above-entitled case, and represent myself. I certify the foregoing document

true and correct under penalty of perjury, pursuant to the laws of the State of California

and the United States of America.

DATED: April 14, 2015   SIGNED:

_____

_____, _____ *in pro per*

1234 Party Party Street
Partytown, PT 12345
Phone: (202) 555-1234
Fax: (202) 555-0987
E-mail: Party1234@internet.party

TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

DECLARATION OF MARK HEDGES

My name is _____. I am _____ (plaintiff/defendant)

pro se in the above-entitled case. This personal declaration based on my information and belief, and if called, I could competently testify to the facts stated herein.

1. On October 19, 1781, Major-General Benjamin Lincoln under General Washington accepted an accord of surrender of the British Forces from General Charles O'Hara under General Lord Charles Cornwallis. Thus ended five years of bitterness and bloodshed among former countrymen.

2. On April 9, 1865, General Ulysses S. Grant of the United States Army accepted the surrender of General Robert E. Lee of the Confederate States Army, ending the Civil War and dissolving the Confederate States. The Generals parted amicably. General Lee was reported to have told the former Confederate troops something along the lines of, "Go home and become good citizens." General Grant was reported to have ordered Union troops to stop firing in celebration, saying "Stop the firing, the Rebels are our countrymen again. Thus ended four years of bitterness and bloodshed among countrymen.

3. On May 7, 1945, General Alfred Jodl of the German Armed Forces High Command signed the unconditional surrender of all German forces to the Allies, ending World War II over the following two days as news spread throughout the world. Japan, which refused to sign the Potsdam Accord, was bombed with nuclear weapons in Hiroshima and Nagasaki on August 6 and 9, 1945, leading to formal signing of surrender on September 2, 1945. Thus ended four years of bitterness and bloodshed among people of the world.

\\

\\

\\

\\   [... *These lines starting with* \\ *indicate the text continues on the next page.* ...]

01   I certify the foregoing declaration true and correct under penalty of perjury, pursuant

02 to the laws of the State of California and the United States of America.

03   DATED: April 14, 2015   SIGNED:

04

05   _____
                                                     _____, _____ *in pro per*
06   1234 Party Party Street
                                                     Partytown, PT 12345
07   Phone: (202) 555-1234
                                                     Fax: (202) 555-0987
08   E-mail: Party1234@internet.party

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TYPIST'S PLEADING TEMPLATE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION

INDEX OF EXHIBITS

Exhibits are a tricky beast, and require use of a shell script to assemble. In this section, create a table with which to index the exhibits attached to the document. Typist recommends using numbers for exhibits, if allowed by your court, instead of letters. This way they can be consecutively numbered across the entire case. Consult your local rules and court clerk about what they expect to see in an index of exhibits.

The page numbering of the exhibit section should start on the next page number after the last page of this document. There is no good way to do this inside the document. After generating the combined exhibits PDF with the shell scripts, manually update the page numbers in the table below.

Some documents also need attachments of orders, which would not necessarily need exhibit tags.

Exhibit	Description	Page
01	Registry of Funk *This doc shows which people got the funk, and how funky they is.*	XX
02	Proof of the Anti-Funk *This is some serious low-down [expletive redacted] right here.*	YY