USCA4 Appeal: 25-1162 Doc: 15-11 Filed: 04/16/2025 Pg: 1 of 2

IN THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

**RYAN DILLON-CAPPS** 

Plaintiff-Appellant,

VS.

OHANA GROWTH PARTNERS, LLC et al

Defendants-Appellees.

No. **25-1162** 

On Appeal from the U.S. District Court

Northern District of Maryland

No. 1:24-CV-3744

## PLAINTIFF-APPELLANTS' MOTION FOR LEAVE TO FILE AN OVERSIZED INFORMAL BRIEF AND SUPPLEMENTAL FILING

Ryan Dillon-Capps respectfully moves this Court for leave to file an oversized informal brief and to submit supplemental filings. The informal brief raises numerous serious concerns about the proceedings and record in the District Court, including potential violations of constitutional rights, procedural due process, and factual inconsistencies.

The informal brief includes statements of fact with evidentiary citations, legal authorities, and appendices to assist the Court's review. Due to the complex and urgent nature of the issues presented, including structural errors and potential ultra vires acts, a standard-length brief would be insufficient to address all relevant matters.

Unfortunately, Mr. Dillon-Capps's declining health has substantially impaired his ability to finalize a table of authorities, complete all cited exhibits, and perform additional revisions prior to the due date.

WHEREFORE, Plaintiff respectfully requests that this Court grant leave to file an oversized informal brief and permit supplemental/amended filing as necessary to complete the record and fully inform the Court's review.

## **RESPECTFULLY SUBMITTED**

April 16, 2025		1334 Maple Avenue
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