

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND	
RYAN DILLON-CAPPS	Civil Action
<i>Plaintiff,</i>	No. _____
vs.	
OHANA GROWTH PARTNERS, LLC <i>et al</i>	Hon. _____
<i>Defendants</i>	
<u>COMPLAINT INTEGRATED APPENDIX: EMERGENCY EX PARTE HEARING</u>	

Plaintiff incorporates all subsequent sections and attachments herein by reference as though fully stated in this main document.

TO THE HONORABLE COURT:

1 Pursuant to Federal Rules of Civil Procedure 65(b), 26(c), and 6(c)(1)(C), Plaintiff Ryan Dillon-Capps respectfully requests an immediate emergency ex parte hearing for the purposes of:

1. Allowing testimony under seal to protect sensitive information and ensure the safety of all involved parties;
2. Ruling on the following pending motions and requests:

2.1 In Forma Pauperis Relief with Limited Attorney Designation;

2.2 State-Level Negotiations and Systemic Oversight Relief;

2.3 Conditional Permissive Joinder;

2.4 Interlocutory Partial Summary Judgment.

### Grounds For Relief

#### I. TESTIMONY UNDER SEAL

2 Plaintiff seeks an order to secure testimony and evidence under seal due to the sensitive nature of the information involved, including:

1. Explicit admissions by Defendants under oath demonstrating willful violations of federal laws;
2. Evidence revealing systemic judicial misconduct and corruption that, if disclosed publicly, could endanger the Plaintiff and hinder investigations;
3. Records indicating procedural violations and acts of obstruction by state and judicial officials.

#### II. IMMEDIATE RULINGS ON PENDING REQUESTS

3 The Plaintiff asserts that the urgent nature of the ongoing harm and the systemic issues raised necessitate immediate judicial action on the following motions and requests:

1. **In Forma Pauperis Relief with Limited Attorney Designation:** To provide Plaintiff the ability to effectively present their case while safeguarding access to justice;
2. **State-Level Negotiations and Systemic Oversight Relief:** To address systemic issues involving judicial misconduct and ensure proper oversight;
3. **Conditional Permissive Joinder:** To include additional parties whose participation is necessary for a full resolution of the claims;
4. **Interlocutory Partial Summary Judgment:** To resolve key issues and claims that are fully supported by the evidence and require no further factual determination.

### Legal Basis

4 **Rule 65(b):** Temporary restraining orders without notice are warranted when specific facts show that immediate and irreparable harm will result.

5      **Rule 26(c):** Protective orders are appropriate to ensure confidentiality for testimony that risks exposing sensitive legal, financial, or personal matters.

6      **Rule 6(c)(1)(C):** Expedited hearings are warranted in situations where delaying justice risks compounding harm or irreversibly prejudicing the moving party.

Requested Relief

7      Plaintiff respectfully requests that this Court:

1.      Schedule an immediate emergency ex parte hearing to consider this motion;
2.      Allow testimony under seal to safeguard sensitive information;
3.      Rule on the following motions and requests:
  - 3.1      In Forma Pauperis Relief with Limited Attorney Designation;
  - 3.2      State-Level Negotiations and Systemic Oversight Relief;
  - 3.3      Conditional Permissive Joinder;
  - 3.4      Interlocutory Partial Summary Judgment;
4.      Provide any additional relief deemed just and proper in the circumstances.

Prayer For Relief

8      For the reasons stated above, Plaintiff prays this Honorable Court will:

1.      Grant this Motion for Emergency Ex Parte Hearing;
2.      Issue immediate rulings on the specified motions and requests;
3.      Provide any further relief this Court deems appropriate.

RESPECTFULLY SUBMITTED

December 25, 2024

/s/ Ryan Dillon-Capps  
Ryan Dillon-Capps

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