

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DR. ORLY TAITZ, ESQ, PRO SE,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 11-CV-00402-RCL
)	The Honorable Royce C. Lamberth
CAROLYN W. COLVIN,)	
ACTING COMMISSIONER,)	
SOCIAL SECURITY ADMINISTRATION)	
)	
Defendant.)	
)	

DEFENDANT’S MOTION TO STRIKE

Defendant, the Acting Commissioner of the Social Security Administration, by and through its undersigned counsel, hereby moves the Court to strike from the record Plaintiff’s third Motion for Reconsideration, dkt. no. 52, including the exhibits contained therein. Those filings contain multiple social-security numbers (“SSNs”), along with Plaintiff’s allegations as to the individuals to whom those numbers are assigned. “Unless the court orders otherwise, in an electronic or paper filing with the court that contains an individual’s social-security number . . . a party or nonparty making the filing may include only . . . the last four digits of the social-security number.” Fed. R. Civ. P. 5.2(a)(1). For at least the seventh time in the above-captioned case – to say nothing of examples in other cases she has filed in this and other Courts – Plaintiff has violated this rule by filing unredacted social-security numbers.

Indeed, this filing follows the Court’s admonitions to Plaintiff that “the rules regarding redaction of social security numbers are simple,” that the Court “has reminded the plaintiff of

this on multiple occasions,” and that “repeated violations of the Rules are in fact sanctionable, even *sua sponte*.” Memorandum & Order, dkt. no. 44 (June 7, 2013).¹ Notwithstanding this warning, Plaintiff has again made only a half-hearted attempt to ensure her filings are in compliance with the Rules. In this instance, Plaintiff substituted the text “xxx-xx” for the first five digits of an SSN in the body of her motion. *See, e.g.*, dkt. no. 52 at p. 6. Yet in the attached exhibits, she continues to file multiple unredacted SSNs in their entirety, including the one for which she substituted alternate text in her motion. *See, e.g.*, dkt. no. 52 at page 25 (purported printout from Social Security Number Verification System containing SSN and name); *id.* at page 29 (IRS Form 709 containing name and lightly crossed-out SSN); *Id.* at page 32 (“Affidavit” containing SSNs).

CONCLUSION

For the foregoing reasons, the Court should strike Plaintiff’s motion for reconsideration from the docket and grant such other relief as may be warranted.

Dated: November 4, 2013

Respectfully submitted,

STUART F. DELERY
Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Director, Federal Programs Branch

/s/Eric J. Soskin
Eric J. Soskin
PA Bar No. 200663
Trial Attorney

¹ Defendant has not sought sanctions for Plaintiff’s past violations out of respect for the Court’s time and mindful that collateral motions practice is generally disfavored. Defendant has noted the Court’s statement in its June 7, 2013 Order that it “has declined to previously impose sanctions because the defendant has not sought them,” and, in light of Plaintiff’s continued disregard for the Rules, will consider whether to file such a motion.

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