

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Benjamin Brown, pro se,
Plaintiff,
v.
Federal Bureau of Prisons,
Defendant.

Case No: 19-cv-02795 (RBW)

MOTION FOR AN EXTENSION OF TIME

Proposed-intervenor and Claimant, Martin S. Gottesfeld (herein the "claimant"), acting pro se, hereby moves The Honorable Court for an extension of time until Monday, August 10th, 2020, in which for him to reply to the Defendant's opposition (Docket entry (D.B.) 25; April 16th, 2020) to his motions to intervene (D.B. 6 and R.B. 6-1; November 4th, 2019).

In support of this motion, the claimant herewith provides and respectfully directs The Court's attention to Exhibit 1 hereto, Declaration of Martin S. Gottesfeld (Thursday, July 2nd, 2020).

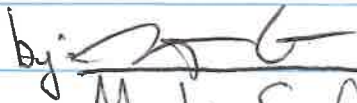
Should The Court be left with any questions, the claimant requests a brief telephonic hearing and that it order the defendant to produce the claimant for such hearing.

Respectfully filed in accordance with the prison-mailbox rule of Houston v. Lack, 487 U.S. 266 (1988), by mailing to The Court in an envelope bearing sufficient affixed pre-

RECEIVED
Mail Room
JUL 22 2020
Angela B. Casper, Clerk of Court
U.S. District Court, District of Columbia

1 of 3
1 of 5

paid first-class U.S. postage and U.S.P.S. tracking number 9114 9023 0722 4792 9874 68, handed to Ms. Jamie Wheeler of the FCI Terre Haute CMU unit team while acting in her official capacity as an agent of the defendant on Thursday, July 2nd, 2020, or the first opportunity thereafter,

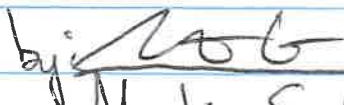
by: 

Martin S. Gottesfeld, pro se
Reg. No.: 12982-104
Federal Correctional Institution
P.O. Box 33
Terre Haute, IN 47808

CERTIFICATE OF SERVICE

I, Martin S. Gottesfeld, pro se, certify that I mailed copies of the foregoing document to the plaintiff and counsel for the defendant in the above-captioned case in envelopes bearing sufficient affixed pre-paid first-class U.S. postage, handed to Ms. Jamie Wheeler of the FCI Terre Haute CMU unit team while acting in her official capacity as an agent of The United States and of the defendant's counsel on Thursday, July 2nd, 2020, or the first opportunity thereafter,

2 of 3
2 of 5

by: 

Martin S. Gottesfeld, pro se

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

BENJAMIN BROWN,
Plaintiff,

v.

FEDERAL BUREAU OF
PRISONS,
Defendant.

Civil Action No.: 19-2795 (RBW)

ORDER

Upon consideration of the proposed intervenor's
foregoing MOTION FOR AN EXTENSION OF TIME, it is hereby
ORDERED that the proposed intervenor's foregoing
MOTION FOR AN EXTENSION OF TIME is GRANTED. It
is further

ORDERED that, on or before August 10, 2020, the
proposed intervenor shall file a reply, if any, in support of
his motion to intervene. It is further

ORDERED that the Clerk of the Court shall forthwith
mail copies of this Order to the plaintiff's and the proposed
intervenor's addresses on record.

SO ORDERED this _____ day of _____,
2020.

REGGIE B. WALTON
United States District Judge

Exhibit 1Declaration of Martin S. Gottesfeld:

I, Martin S. Gottesfeld, declare that the following is true and correct under the penalty of perjury under the laws of The United States pursuant to 28 U.S.C. § 1746(1) on this second (and) day of July, 2020:

1. I am Martin S. Gottesfeld and I am the proposed intervenor in the case of Braun v. Federal Bureau of Prisons, 19-cv-02795-RBW Cheren "the case", currently pending before The Honorable U.S. District Court for The District of Columbia Cheren "The Court".


2. My status during the defendant's nationwide coronavirus lockdown remains materially the same from my Monday, April 20th, 2020, MOTION FOR AN EXTENSION OF TIME (docket entry ~~26~~ (D.E.) 26), e.g. I am subject to unpredictable and indeterminate total lockdowns and otherwise deprived of adequate law-library access to compose robust legal documents. Id. Exhibit 1 ¶¶ 6-9. Please cf. also MINUTE ORDER 4:21 P.M. April 30, 2020.

3. I and agents of the defendant came to understand that the defendant was to re-evaluate the ongoing lockdown yesterday, however, nothing has materially changed and the defendant is yet to provide me additional insight.

4. I secured an extension of time until Monday, July 27, 2020, in which to file an amended reply in another case: Gottesfeld v. Lammer, 2:20-cv-00012-JRS-MJD ECF No. 45 (S.D. Ind. June 25, 2020).

5. If the lockdown ends on or around my current deadline in the instant case, Monday, July 13th, 2020, then I anticipate that the composition of my amended reply in the other case will require all of my law-firm's time up through Monday, July 27th, 2020, and that the earliest I could expect to file my reply in the instant case, pursuant to the postbox-mailbox rule of Houston v. Lack, 487 U.S. 266 (1988), would be Monday, August 10th, 2020.

I declare that the foregoing is true and correct under the penalty of perjury under the laws of The United States. Executed on Thursday, July 2nd, 2020.

by: 
Martin S. Gottesfeld

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

BENJAMIN BROWN, pro se,
Plaintiff,
v.
FEDERAL BUREAU OF
PRISONS,
Defendant.

Case No. 19-cv-02795 (RBW)

NOTICE OF FILING OF BLOCKED CORRESPONDENCE

Proposed-intervenor and claimant Martin S. Gottesfeld (herein the "claimant"), acting pro se, hereby notifies The Honorable Court and the parties of his filing of examples of his correspondence that the defendant unlawfully suppressed. Exhibits 1-3 hereto. The claimant also herewith-provides authentication thereof. Exhibit 4 hereto, Declaration of Martin S. Gottesfeld (Thursday, July 2nd, 2020).

The claimant will cite to these materials in his forthcoming reply in support of his motions to intervene (Docket entry (D.E.) 6 and D.E. 6-1). He herein makes no motion at this time.

Respectfully Filed in accordance with the prison-mailbox rule of Houston v. Lack, 487 U.S. 266 (1988), by mailing to The Court in an envelope bearing sufficient affixed pre-paid first-class U.S. postage and U.S.P.S. tracking number 9114 9023 0722 4792 9874 68, handed

1 of 2
1 of 7

to Ms. Jamie Wheeler of the FCI Terre Haute CMU unit team, while acting in her official capacity as an agent of the defendant on Thursday, July 2nd, 2020, or the first opportunity thereafter,

by: MSG

Martin S. Gottesfeld, pro se

Reg. No.: 12982-104

Federal Correctional Institution

P.O. Box 33

Terre Haute, IN 47808

CERTIFICATE OF SERVICE

I, Martin S. Gottesfeld, pro se, certify that I mailed copies of the foregoing document to the plaintiff and counsel for the defendant in the above-captioned case in envelopes bearing sufficient affixed pre-paid first-class U.S. postage, handed to Ms. Jamie Wheeler of the FCI Terre Haute CMU unit team while acting in her official capacity as an agent of The United States and of the defendant's counsel on Thursday, July 2nd, 2020, or the first opportunity thereafter,

by: MSG

Martin S. Gottesfeld, pro se

TRULINCS 12982104 - GOTTESFELD, MARTIN - Unit: THA-D-A

FROM: 12982104

TO: Bloom, Jordan; Bolling, Eric; Brown, Benjamin; Brown, Greg; Camp, Frank; Evans, Tim; Fortin, Lori; Gosztola, Kevin; Gottesfeld, Dana; Green, Jeremy; Grim, Ryan; Kiriakou, John; Kushner, David; Malkin, Michelle; Mcbreen, Kelen; Mcmillen, Alexi; Newman, Alex; Pavlo, Walter; Petrovskaya, Elmira; Sample, Brandon C; Shaw, Carey M; Tesoriero, Celeste; Thornton, Ian; Volpe, Michael; Wright, Meredith

SUBJECT: 2020-06-09: Statement

DATE: 06/09/2020 05:36:11 PM

Hi Jordan, Eric, Attorney Brown, Greg, Frank, Tim, Lori, Kevin, Dana, Attorney Green, Ryan, John, David, Michelle, Kelen, Lexi, Alex, Walter, Elmira, Attorney Sample, Mitchell, Attorney Tesoriero, Ian, Michael, and Meredith,

I hereby make the following available under the latest Creative Commons by-attribution derivatives-permitted no-need-to-share-alike commercial-use-permitted license.

Regards,

/s/ Marty

I sent you this message at approximately P.M. Tuesday, June 9th, 2020.

Suggested headline/tagline/featured image:

Headline (62 characters, 10 words): Federal Prison Official Jason Bradley May Have Spread Covid-19

Tagline (53 characters, 7 words): Coworker Also Accuses Bradley of Falsifying Documents

{Embed: featured image, available from my previous article, map of the BOP's North Central region, with dots for each facility and pinpoint on Terre Haute, Indiana; attribution: FreeMartyG/Creative Commons (2020); no caption}

A federal Bureau of Prisons (BOP) disciplinary officer named Jason Bradley may have condemned a federal prisoner to death by Covid-19.

That prisoner is now under federal quarantine. His move there followed the government's discovery that Bradley---who is an employee of the BOP's North Central regional office in Kansas City, Kansas---has coronavirus. Yet Bradley recently held disciplinary hearings inside the sprawling federal correctional complex in Terre Haute, Indiana. The complex is home to thousands of prisoners.

Since Bradley's visit, but before the BOP learned of his status as a coronavirus carrier, the BOP had acknowledged 1 prisoner death and 3 other positive tests in its Terre Haute complex. It is distinctly possible the coronavirus entered the complex through multiple vectors.

The new quarantine, however, can only reasonably be attributed to Bradley's presence.

Indeed, other BOP staffers at the facility are upset Bradley was allowed entry, since his presence may have negated weeks of arduous efforts to keep out the coronavirus.

And this is not the first time Bradley has faced consternation from his fellow BOP employees. Last year, a correctional officer (CO) in Terre Haute filed an official memorandum effectively accusing Bradley of falsifying federal documents.

Falsifying federal documents, of course, is a {start link to 18 U.S.C. Sec. 1519;}federal felony. Southern District of Indiana U.S. Attorney {insert full name} seems never to charge BOP employees like Bradley, however. Instead, the CO who reported Bradley is now under orders to avoid Bradley and not participate in the prison-discipline process.

{Insert surname of U.S. Attorney} never publicly addressed the decision not to charge Bradley.

BOP North Central Regional Director {Insert first name} E. {spell check surname;}Kruegger is also yet to address publicly Bradley's current status as a coronavirus carrier, the facilities he may have affected, or the previous complaints against Bradley for falsifying documents.

- Page 1 of 1 -
- Page 3 of 7 -

Exhibit 2

TRULINCS 12982104 - GOTTESFELD, MARTIN - Unit: THA-D-A

FROM: 12982104

TO: Bloom, Jordan; Bolling, Eric; Brown, Benjamin; Brown, Greg; Camp, Frank; Evans, Tim; Fortin, Lori; Gosztola, Kevin; Gottesfeld, Dana; Green, Jeremy; Grim, Ryan; Kiriakou, John; Kushner, David; Malkin, Michelle; Mcbreen, Kelen; Mcmillen, Alexi; Newman, Alex; Pavlo, Walter; Petrovskaya, Elmira; Sample, Brandon C; Shaw, Carey M; Tesoriero, Celeste; Thornton, Ian; Volpe, Michael; Wright, Meredith

SUBJECT: 2020-06-09: Statement Addendum

DATE: 06/09/2020 06:06:44 PM

Hi Jordan, Eric, Attorney Brown, Greg, Frank, Tim, Lori, Kevin, Dana, Attorney Green, Ryan, John, David, Michelle, Kelen, Lexi, Alex, Walter, Elmira, Attorney Sample, Mitchell, Attorney Tesoriero, Ian, Michael, and Meredith,

I wish to add the following---which I make available under the same Creative Commons license---to the end of the statement I dated earlier today.

Regards,

/s/ Marty

I sent you this message at approximately 6:10 P.M. Tuesday, June 9th, 2020.

Earlier this year, though, this reporter published an {start link to article at FreeMartyG.com;}unflattering look{end link} at {check spelling on surname;}Kruegger's leadership. It revealed that when Kruegger was the warden of the Terre Haute correctional complex, he used mannequins as decoys to staff guard towers, instead of professional marksmen. This complex, it's also worth noting, is home to the nation's only federal death row, which houses convicted murderers and child rapists, as well as a {start italics;}communications-management unit{end italics}, or {start italics;}CMU{end italics}, which houses convicted spies and terrorists---all of whom Kruegger guards with mannequins while his federal pension grows.

- Page 1 of 1 -
- Page 4 of 7 -

TRULINCS 12982104 - GOTTESFELD, MARTIN - Unit: THA-D-A

FROM: 12982104
TO: Evans, Tim; Gottesfeld, Dana; Sample, Brandon C
SUBJECT: Hello from the DOJ's black-site prison in Indiana
DATE: 06/12/2020 07:23:08 PM

Hi Tim, Dana, and Attorney Sample,

It is good to be in touch with Tim. I hope he received my mail, which I sent on May 4th, 2020, bearing U.S.P.S. tracking number 9114 9023 0722 4792 9863 55.

I apologize it took me a few days to send this electronic message. Things have been hectic and I have filing deadlines.

The first lead I wish to discuss is mentioned in the 2020-06-09 statement addendum I sent out. A corresponding article was published earlier this year at FreeMartyG.com and elsewhere. It featured an image of Jeff Dunham's characters Achmed the Dead Terrorist and Walter. I think Tim's readership in the state would be quite interested and surprised.

The second lead to discuss is the high-profile ISIS-inspired murder by near-beheading that happened here in the communications-management unit in November 2018. I have published about it and The Daily Caller wrote an article too, but Tim's readership in Indiana is yet to see an in-depth investigative piece in The Indy Star. I wish to note the legal principle of litigation privilege, i.e. any lawsuit filed in the U.S. against a publication for defamation, libel, or slander for quoting from court proceedings is subject to immediate summary dismissal (therefore no lawyer worth his or her salt would bring such a suit in the first place). The Daily Caller embedded a federal-court transcript that I think Tim will find very interesting.

Of course, DHO Bradley's recent indiscretion is also newsworthy. I hear an unconfirmed rumor that while Bradley was inside the FCI he openly bragged about having the virus. If there is any truth to this rumor, then I would expect similar bragging at other facilities and units he visited.

Please confirm your receipt of this message and let me know what you think of these leads. There are others, but I only have two (2) hours today outside my cell and I have much to do.

Also, please date/time stamp your messages to me as I have done below. My messages are often subject to extraordinary delays because I am a journalist on the inside. Absent manual timestamps, we won't know when our messages were actually sent; they falsify the timestamps in the computer to reflect instead when the censors let them pass.

Regards,
/s/ Marty

I sent you this message at approximately 7:24 P.M. Friday, June 12th, 2020.

- Page 1 of 1 -
- Page 5 of 7 -

Exhibit 4Declaration of Martin S. Gottsfeld:

I, Martin S. Gottsfeld, declare that the following is true and correct under the penalty of perjury under the laws of The United States pursuant to 28 U.S.C. § 1746 (1) on this second (2nd) day of July, 2020:

1. I am Martin S. Gottsfeld and I am the proposed intervenor in the case of Brown v. Federal Bureau of Prisons, 19-cv-02795-RBW (herein "the case"), currently pending before The Honorable U.S. District Court for The District of Columbia (herein "The Court").

2. Each of the preceding exhibits 1-3 of this filing is what it purports to be, correspondence I tried to send to the purported addressees at the purported dates using the defendant's electronic-messaging system.

3. The defendant rejected each message depicted in exhibits 1-3.

4. The defendant's aforementioned rejections were each untimely, so as they would not appear to me by default when I checked my "Rejected Messages" list in TRULINCS.

5. I never received any signed rejection notice from the defendant regarding the aforementioned untimely rejections, and so far as I know, the defendant sent no notification whatsoever to the addressees advising them that my correspondence to them had been rejected, thus leaving them unable to appeal these untimely rejections.

6. I am also unable to appeal the aforesaid untimely rejections, because, separately and severably, (1) I never received signed rejection notices and (2) the defendant vindictively retaliates against me when I try to use its administrative-remedy program (ARP).

~~Executed~~ I declare that the foregoing is true and correct under penalty of perjury under the laws of The United States. Executed on Thursday, July 2nd, 2020.

by: MSG
Merton S. Gottesfeld, pro se

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

BENJAMIN BROWN, *pro se*,
Plaintiff,

v.

FEDERAL BUREAU OF
PRISONS,
Defendant.

Case No. 19-cv-02795 (RBW)

MOTION TO ORDER THE DEFENDANT TO PRODUCE MR.
GOTTESFELD AT THE 11:00 A.M. NOVEMBER 2, 2020,
HEARING

Proposed-intervenor and Claimant Martin S. Gottesfeld (herein the "claimant"), acting *pro se*, hereby moves The Honorable Court to order the defendant to produce him telephonically at the 11:00 A.M. November 2, 2020, hearing. Please cf. docket entry (D.E.) 30 at 1 n. 2.

In support of this motion, the claimant herewith provides and respectfully directs The Court's attention to Exhibit 1 hereto, Declaration of Martin S. Gottesfeld (Thursday, July 2nd, 2020).

Should The Court be left with any questions, the claimant requests a brief telephonic hearing and that it order the defendant to produce the claimant for such hearing.

Respectfully filed in accordance with the prison-mailbox rule of Houston v. Lack, 487 U.S. 266 (1988), by mailing to The Court in an envelope bearing sufficient affixed pre-paid first-class U.S. postage and U.S.P.S. tracking number 9114 9023 0722 4792 9874 68, handed to Ms. Janice Wheeler of the FCI Terre Haute CMU unit team while acting in her official capacity as an agent of the defendant on Thursday, July 2nd, 2020, or the first opportunity thereafter,

by: 

Martin S. Gottesfeld, pro se
Reg. No. 12982-104
Federal Correctional Institution
P.O. Box 33
Terre Haute, IN 47808

2 of 5

2 of 8

CERTIFICATE OF SERVICE

I, Martin S. Gottesfeld, pro se, certify that I mailed copies of the foregoing document to the plaintiff and counsel for the defendant in the above-captioned case in envelopes bearing sufficient affixed pre-paid first-class U.S. postage, handed to Ms. Jamie Wheeler of the FCI Terre Haute CMU unit team while acting in her official capacity as an agent of The United States and of the defendant's counsel on Thursday, July 2nd, 2020, or the first opportunity thereafter.

by: MSG
Martin S. Gottesfeld, pro se

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

BENJAMIN BROWN,
Plaintiff,
v.
FEDERAL BUREAU OF
PRISONS,
Defendant.

Civil Action No. 19-2795 (RBW)

ORDER

Upon consideration of the proposed intervenor's foregoing MOTION TO ORDER THE DEFENDANT TO PRODUCE MR. GOTTESFELD AT THE 11:00 A.M. NOVEMBER 2, 2020, HEARING, it is hereby

ORDERED that the proposed intervenor's foregoing MOTION TO ORDER THE DEFENDANT TO PRODUCE MR. GOTTESFELD AT THE 11:00 A.M. NOVEMBER 2, 2020, HEARING is GRANTED. It is further

ORDERED that the defendant shall produce Mr. Gottesfeld telephonically at The Court's 11:00 A.M. November 2, 2020, hearing. It is further

ORDERED that the Clerk of the Court shall forthwith mail copies of this Order to the plaintiff's and the proposed intervenor's addresses of record.

SO ORDERED this _____ day of _____, 2020.

REGGIE B. WALTON
United States District Judge

5 of 5
5 of 8

Exhibit 1

Declaration of Martin S. Gottesfeld:

I, Martin S. Gottesfeld, declare that the following is true and correct under the penalty of perjury under the laws of The United States pursuant to 28 U.S.C. § 1746(1) on this second (and) day of July, 2020:

1. I am Martin S. Gottesfeld and I am the proposed intervenor in the case of Brown v. Federal Bureau of Prisons, 19-cv-02795-RBW wherein "the case", currently pending before The Honorable U.S. District Court for the District of Columbia wherein "The Court".

2. Attachment 1 hereto is a true copy of a written request I submitted to my unit team at the same time I handed over this filing for mailing.

3. Agent of the defendant Katherine Morris Sierewald has a well-established pattern of practice wherein she actively prevents CMU prisoners like me from participating in court hearings when we are ordered to do so, and this leads to unnecessary delays, orders to show cause, and judicial ineconomy.

4. I believe in good faith that the only way for The Court to be reasonably assured of my presence at the 11:00 A.M. November 2, 2020, hearing is for The Court to order the defendant to produce me at said hearing.

1 of 3
6 of 8

I declare that the foregoing is true and correct under the laws of The United States, ~~executed~~ under

the penalty of the perjury. Executed Thursday, July
2nd, 2020.

by: ~~MSG~~
Martin S. Gottstedt, pro se

2 of 3
7 of 8

Attachment 1
To: CMU Unit Team
From: Martin S. Gottesfeld (Reg. No. 12982-104)
Date: Thursday, July 2nd, 2020
Subject: Mandatory appearance at Federal-court hearing ~~at~~
at 11:00 A.M. November 2, 2020

Salutations Unit Team,

I hope you are well.

I have been ordered to appear telephonically at a hearing at 11:00 A.M. November 2, 2020, in the case of Brown v. Federal Bureau of Prisons, 19-cv-~~02795 (RBW)~~ ~~Please see id. Minute Order (4:21 P.M. April 30, 2020)~~ ~~02795-RBW (P.D.C.)~~ Please cf. id. Minute Order (4:21 P.M. April 30, 2020) for initial scheduling and id. ECF No. 30 (June 19, 2020) for its continuance until November 2, 2020.

Please arrange for my attendance at this mandatory hearing by telephone.

Thanks,



Martin S. Gottesfeld, pro se