

**UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
TEXAS**

Civil Action No. 3:22-CV-00009

JOE BLESSETT

PLAINTIFF

VS.

TEXAS

GREGG ABBOTT

KEN PAXTON,

**TEXAS OFFICE OF ATTORNEY GENERAL CHILD SUPPORT
ENFORCEMENT DIVISION,**

STEVEN C MCCRAW,

TEXAS DEPARTMENT OF PUBLIC SAFETY

XAVIER BECERRA

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

ANTONY BLINKIN

U.S. DEPARTMENT OF STATE

UNITED STATES

CITY OF GALVESTON

SINKIN LAW FIRM

DEFENDANTS

**Motion for the Production of Documents as per Fed. Rule of Civil Procedure
34 as per Rule 26(d)(2) and Rule 12(f)(1)**

Following the Federal Rules of Civil Procedure and local court rules, Plaintiff requests early production of documents to rebut presumptions presented in the complaint and for the court to strike Defendants motion to dismiss. Blessett Divorce Decree is a

presumption of law that established a fact, “proving the exclusion of Title IV-D debt or a debt to the state of Texas” in the legal instrument. Accordingly, we ask the court to take Judicial Notice of Adjudicative Facts presented in **Exhibit A** state court judgment Blessett’s Divorce Decree, Exhibit B Case 317-cv-00164 Document 21 filed in TXSD on 07/14/17 “The Texas Attorney General was not a party and did not participate in the mediated settlement or the Agreed Divorce Decree,” **Exhibit C** Notice of Change of Payee, and **Exhibit D** Texas Department of Safety Driver Eligibility for JOSEPH BLESSETT as per Fed. Rules of Evidence 201.

Title IV-D of the Social Security Act is a voluntary program and requires the voluntary consent of all participants in the program. Therefore, in unambiguous language, Joe Blessett has made it clear his 5th, 9th, 10th, and 14th amendment rights to enjoy his Divorce Decree judgment. The instrument is self-explanatory, in its unmodified state.

Plaintiff request that Texas office of Attorney General Child Support Enforcement Division, Gregg Abbott, Ken Paxton, documents that create a legal interference to the legal assumption that contradicts **Exhibits A** state court judgment Blessett’s Divorce Decree and **Exhibit B** Case 317-cv-00164 Document 21 filed in TXSD on 07/14/17 “The Texas Attorney General was not a party and did not participate in the mediated settlement or the Agreed Divorce Decree,” document showing JOSEPH BLESSETT consented to Title IV-D program **Exhibit C** change of payee and the judicial order for **Exhibit D** Texas Department of Safety Driver Eligibility for JOSEPH BLESSETT.

1. Blessett requests a copy of the modification to July 23, 1999, Final Divorce Decree used at 2:18 pm on October 22, 1999, by Cynthia Brown-Sayko, Texas Bar No. 00793042, and Assistant Attorney General of the Child Support Division to enter a "Notice of Change of Payee."
2. Blessett requests a copy of the modification to the July 23, 1999, Final Divorce Decree that triggered the use of Title IV-D federal statute 42 U.S.C. 652(k) for Denial of U.S. Passport in 2005.
3. Blessett requests a copy of the modification to the July 23, 1999, Final Divorce Decree that triggered the use of Title IV-D federal statute Driver License Suspension in 2014
4. Blessett requests a copy of the state court judicial order for the September 22, 2014, suspension of driving privileges listed in Exhibit D.
5. Blessett requests a copy of the documents to rebut the CERTIFICATE OF NON-RESPONSE served with the complaint naming Gregg Abbott.
6. Blessett requests a copy of the documents to rebut the CERTIFICATE OF NON-RESPONSE served with the complaint naming Ken Paxton.
7. Blessett requests a copy of the documents to rebut the CERTIFICATE OF NON-RESPONSE served with the complaint naming Steven C McCraw.
8. Blessett requests a copy of the documents required by Title IV-D of the Social Security Act Federal statute 42 U.S.C 654(12).
9. Blessett requests a copy of the Texas State Plan submitted to the Secretary of Health and Human Services for approval.

10. Blessett requests a copy of the Title IV-D service contract with the City of Galveston.

CONCLUSION

We request the Defendants respond in writing within 30 days after being served or delivered under Rule 26(d)(2). Plaintiff has made this motion within the rules set forth by the Federal Rules of Civil Procedure and local court rules. Plaintiff prays for fair and equal treatment.



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2/11/2022

Date

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Certificate of Service

. Plaintiff declares and certifies that copy of the Motion for the Production of Documents as **Fed. Rule of Civil Procedure 34 as per Rule 26(d)(2) and Rule 12(f)(1)** will be served to the Halie E. Daniels Counsel for the Defendants by an independent third-party process server.


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Certificate of Conference

On February 10, 2022, at 9:52 am, Plaintiff conferred with Halie E. Daniels, Assistant Attorney General, and counsel for the State of Texas, Greg Abbott, Ken Paxton, Texas Office of the Attorney General Child Support Enforcement Division, Steven McCraw, and the Texas Department of Public Safety.

Counsel for Plaintiff made his intentions known to request the Production of Documents to rebut the presumptions in the complaint. Counsel for the Defendants disagrees with Plaintiff's intentions. Counsel for the Defendants is confident the court will grant a stay of discovery.


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Date