

In the  
UNITED STATES DISTRICT COURT  
for the  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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BRAND ENGAGEMENT NETWORK, INC. }  
Plaintiff, }  
v. } Civil Action No. 3:25-CV-00114-S  
RALPH WRIGHT BREWER III, *et. al.*, }  
Defendants. }  
}

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**MOTION FOR LEAVE TO FILE  
CIVIL RICO COMPLAINT AND RICO CASE STATEMENT  
(UNDER SEAL)**

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TO THE HONORABLE JUDGE KAREN GREN SCHOLER:

COMES NOW, Defendant Maurice Fitzpatrick (“Fitzpatrick”), pro se, and respectfully submits this *Motion For Leave To File Civil RICO Complaint and RICO Case Statement (Under Seal)*, provisionally under seal, and in support thereof, Fitzpatrick states as follows:

1. Fitzpatrick has previously filed Motions to Intervene and for IFP (Dkt. Nos. 21 and 22), seeking to participate in this matter as a whistleblower, aggrieved party, and to bring claims against present parties in this case and others not yet named.

2. Fitzpatrick has prepared a Civil RICO Complaint and a detailed RICO Case Statement in accordance with the Federal Rules of Civil Procedure.

3. These materials contain sensitive and non-public information, including:

- a. Whistleblower communications;
- b. References to sealed state court filings;
- c. Personally identifying and confidential business data; and
- d. Evidence of retaliation, obstruction, and professional misconduct.

4. In order to preserve the integrity of the record and avoid prejudicing any present or third parties, Fitzpatrick seeks leave to file his Complaint and Case Statement provisionally **under seal** pending resolution of his Motion to Intervene and any related jurisdictional matters.

5. This request is made in good faith and in the interest of judicial economy, pending resolution of his Motion to Intervene (Dkt. No. 21), IFP Motion (Dkt. No. 22), other filings, and Objections (Dkt. No. 58 et seq.).

Dated: April 11, 2025

Respectfully submitted,

/s/ Maurice Fitzpatrick  
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Maurice Fitzpatrick, pro se  
General Delivery  
Dallas, TX 75260-9999  
(214) 694-1551 Telephone  
Email: afglawsuit@yahoo.com

**CERTIFICATE OF SERVICE**

Defendant Fitzpatrick hereby certifies that a copy of the foregoing, *Motion For Leave To File Civil RICO Complaint and RICO Case Statement (Under Seal)*, was served upon the attorneys of record of all parties to the above cause through the Court's CM/ECF e-filing system on April 11, 2025.

/s/ Maurice Fitzpatrick  
Maurice Fitzpatrick, pro se  
General Delivery  
Dallas, TX 75260-9999  
(214) 694-1551 Telephone  
Email: afglawsuit@yahoo.com

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(b), Maurice Fitzpatrick, pro se, contacted all known opposing counsel for Plaintiff and Defendants, via email on April 9, 2025, seeking their position on this *Motion For Leave To File Civil RICO Complaint and RICO Case Statement (Under Seal)*. Counsel Jonathan Clark and Stephen Fox for Plaintiff, and Kelly Kleist for Defendants each responded with a single word: "Opposed."

Accordingly, this motion is submitted as opposed.

WHEREFORE, Maurice Fitzpatrick, pro se, respectfully requests that the Court:

- A. Grant him leave to file the proposed Civil RICO Complaint and RICO Case Statement provisionally under seal;
- B. Allow such filing to be deemed submitted for consideration with respect to his Motion to Intervene and IFP;
- C. Grant all such further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Maurice Fitzpatrick  
\_\_\_\_\_  
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