

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

MATTHEW D. GUERTIN

Plaintiff,

v.

HENNEPIN COUNTY, a municipal entity;

KEITH ELLISON, in his official  
capacity as Minnesota Attorney General;

MARY MORIARTY, in her official  
capacity as Hennepin County Attorney;

CHELA GUZMAN-WEIGART, in her  
official capacity as Assistant County  
Administrator for Law, Safety, and Justice;

JULIA DAYTON-KLEIN, in her  
individual capacity;

GEORGE F. BORER, in his  
individual capacity;

DANIELLE C. MERCURIO, in her  
individual capacity;

DR. JILL ROGSTAD, in her official  
capacity as Senior Clinical Forensic  
Psychologist in the Fourth Judicial District;

DR. ADAM MILZ, in his official capacity  
with Hennepin County Mental Health;

JACQUELINE PEREZ, in her  
official capacity as Assistant Hennepin  
County Attorney;

BRUCE M. RIVERS, in his  
individual capacity.

Defendants.

Case No: 24-cv-02646-JRT-DLM

**PLAINTIFF’S MOTION TO  
CORRECT PROCEDURAL  
DEFICIENCIES AND REQUEST  
FOR ADDITIONAL TIME**

**I. INTRODUCTION**

Plaintiff Matthew Guertin, proceeding pro se, respectfully submits this motion to address and correct certain procedural deficiencies identified by the Defendants in their recent filings. As a pro se litigant, Plaintiff has made every effort to comply with the Court’s procedural rules but acknowledges that some oversights have occurred. Plaintiff requests the Court’s understanding

understanding and seeks additional time to correct these deficiencies.

## **II. ACKNOWLEDGEMENT OF DEFICIENCIES**

In their recent memorandum, the Defendants identified several procedural deficiencies in Plaintiff's filings, specifically:

### **Failure to Schedule a Hearing:**

Plaintiff acknowledges that a hearing was not scheduled for the Motion for Preliminary Injunction, as required by local rules.

### **Lack of a Notice of Hearing and Proposed Order:**

Plaintiff failed to file a notice of hearing and a proposed order alongside the motion.

### **Bond Requirement:**

Plaintiff did not address the bond requirement associated with the request for a preliminary injunction.

## **III. REQUEST FOR ADDITIONAL TIME AND CORRECTION PLAN**

Plaintiff is committed to correcting these deficiencies promptly and respectfully requests the Court to grant additional time to take the following actions:

### **Schedule a Hearing:**

Plaintiff will contact the Court's deputy to schedule a hearing date for the Motion for Preliminary Injunction and will file a Notice of Hearing with the Court promptly thereafter.

### **File a Proposed Order:**

Plaintiff will submit a proposed order in accordance with the local rules.

**Address the Bond Requirement:**

Plaintiff will file a motion requesting a waiver of the bond requirement or, alternatively, propose a minimal bond amount within Plaintiff's means.

**IV. GOOD FAITH EFFORTS AND REQUEST FOR LENIENCY**

Plaintiff has made every effort to navigate the complexities of this case while balancing significant work obligations (currently painting a house) and limited legal experience. Plaintiff respectfully requests the Court's leniency in considering these procedural deficiencies, given the substantial issues at hand and the Plaintiff's pro se status. Plaintiff is committed to addressing these issues in good faith and within the requested additional time.

**V. CONCLUSION**

For the reasons stated above, Plaintiff respectfully requests that the Court grant this motion and provide additional time to correct the identified procedural deficiencies. Plaintiff remains fully committed to complying with all Court rules and procedures.

Dated: August 27, 2024

Respectfully submitted,

/s/ Matthew D. Guertin

Matthew David Guertin  
Pro Se Plaintiff  
1075 Traditions Ct.  
Chaska, MN 55318  
Telephone: 763-221-4540  
[MattGuertin@protonmail.com](mailto:MattGuertin@protonmail.com)  
[www.MattGuertin.com](http://www.MattGuertin.com)