

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Kellye Strickland,

Case No. 25-cv-02056-DWF-DJF

Plaintiff,

Hon. Donovan W. Frank

Hon. Dulce J. Foster

v.

Ramsey County, et al.,

Defendants.

**NOTICE OF PROCEDURAL IRREGULARITY
REGARDING DOCKET ENTRY NO. 69**

Plaintiff respectfully submits this Notice to preserve the procedural record regarding the Clerk's denial of default (Doc. 69), filed September 16, 2025.

The Clerk's letter states that default will not be entered because "the parties filed Motions to Dismiss pursuant to Fed. R. Civ. P. 12(b), which are considered responses to your Complaint." However, Plaintiff notes that the Motion to Dismiss filed by Bradley Kletscher on behalf of Barna, Guzy & Steffen (BGS) was submitted **after** the deadline for that party.

Specifically:

- Defendant **Barna, Guzy & Steffen LLP (BGS)** was served and due to respond by **September 2, 2025**.
- Defendant **Kyle Manderfeld**, who shares counsel, was separately served and due by **September 5, 2025**.
- Counsel **filed two Motions to Dismiss on September 3, 2025** (Dkt. 64), timely for Manderfeld but **one day late for BGS**.
- No request for extension or retroactive enlargement under Rule 6(b) was filed or granted.

Plaintiff notes that these defendants are separate parties with distinct deadlines, and a timely filing for one does not retroactively cure untimeliness for the other.

Plaintiff reserves all rights to raise the procedural consequences of BGS's failure to respond within the required time under Rule 12(a), and files this Notice to ensure the record reflects the full procedural context of the Clerk's denial of default.

Dated: September 16, 2025 Respectfully submitted,

/s/ Kellye Strickland

Kellye Strickland

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Pro Se Plaintiff