

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
NORTHERN DIVISION

Cause No.: RUB 18 CV 0885

RONALD E. DIXON JR., )  
18751 Harmony Woods Lane )  
Germantown, MD 20874 [Montgomery Co.] )

Petitioner, )

v. )

STATE OF MARYLAND, )

FREDERICK COUNTY DEPARTMENT )  
OF SOCIAL SERVICES, )

1888 North Market Street, P.O. Box 3066 )  
Frederick, MD 21705-3066, and )

BETH M. DIXON, )  
503 Mount Vernon Place #3 )

Rockville, MD 20850 [Montgomery Co.], )

Respondents. )

In the related removals from the Circuit  
Court of Frederick County, Maryland:

State case number: C-10-CR-18-000024  
("State of Maryland v. Ronald Eugene  
Dixon")

AND

State case number: 10-C-13-003130  
("Frederick County Department of  
Social Services v. Ronald Dixon")

Judge Julie R. Stevenson Solt, presiding

CONSTITUTIONAL QUESTIONS

DEMAND FOR JURY TRIAL

**Notice of Special *Pro Se* Litigant Rights**

Comes now Petitioner, Brian J. Robinson, respectfully providing the Court and all parties a sample collection of federal case law regarding certain special respect to and for *pro se* rights:

*Pro se* pleadings are always to be construed liberally and expansively, affording them all opportunity in obtaining substance of justice, over technicality of form. Maty v. Grasselli Chemical Co., 303 U.S. 197 (1938); Picking v. Pennsylvania Railroad Co., 151 F.2d 240 (3rd Cir. 1945); Jenkins v. McKeithen, 395 U.S. 411, 421 (1959); Haines v. Kerner, 404 U.S. 519, 520-21, 92 S.Ct. 594, 596, 30 L.Ed.2d 652 (1972); Cruz v. Beto, 405 U.S. 319, 322, 92 S.Ct.

1079, 1081, 31 L.Ed.2d 263 (1972); Puckett v. Cox, 456 F. 2d 233 (6th Cir. 1972); and, etc., etc., etc., practically *ad infinitum*.

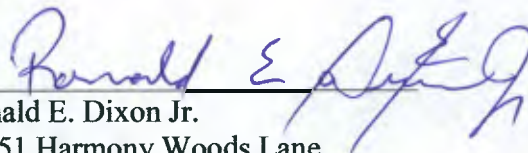
If the court can reasonably read the submissions, it should do so despite failure to cite proper legal authority, confusion of legal theories, poor syntax or sentence construction, or a litigant's unfamiliarity with particular rule requirements. Boag v. MacDougall, 454 U.S. 364, 102 S.Ct. 700, 70 L.Ed.2d 551 (1982); Estelle v. Gamble, 429 U.S. 97, 106, 97 S.Ct. 285, 50 L.Ed.2d 251 (1976) (quoting Conley v. Gibson, 355 U.S. 41, 45-46, 78 S.Ct. 99, 2 L.Ed.2d 80 (1957)); Haines v. Kerner, 404 U.S. 519, 92 S.Ct. 594, 30 L.Ed.2d 652 (1972); McDowell v. Delaware State Police, 88 F.3d 188, 189 (3rd Cir. 1996); United States v. Day, 969 F.2d 39, 42 (3rd Cir. 1992); Then v. I.N.S., 58 F.Supp.2d 422, 429 (D.N.J. 1999); and, etc., along with numerous similar rulings.

When interpreting *pro se* papers, this Court is required to use its own common sense to determine what relief that party either desires, or is otherwise entitled to. S.E.C. v. Elliott, 953 F.2d 1560, 1582 (11th Cir. 1992). See also, United States v. Miller, 197 F.3d 644, 648 (3rd Cir. 1999) (court has a special obligation to construe *pro se* litigants' pleadings liberally); Poling v. K. Hovnanian Enterprises, 99 F.Supp.2d 502, 506-07 (D.N.J. 2000); and, etc.

Indeed, the courts will even go to particular pains to **protect** *pro se* litigants against consequences of technical errors if injustice would otherwise result. U.S. v. Sanchez, 88 F.3d 1243 (D.C.Cir. 1996).

Moreover, "*the court is under a duty to examine the complaint to determine if the allegations provide for relief on **\*any\*** possible theory.*" (emphasis added) See, e.g., Bonner v. Circuit Court of St. Louis, 526 F.2d 1331, 1334 (8th Cir. 1975) (quoting Bramlet v. Wilson, 495 F.2d 714, 716 (8th Cir. 1974)), and etc.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Ronald E. Dixon Jr.", written over a horizontal line.

Ronald E. Dixon Jr.  
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*Pro Se Petitioner Party of Record*