



Imre Kifor <ikifor@gmail.com>

26-1346 Kifor v. Commonwealth of Massachusetts, et al "Motion (other)"

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United States Court of Appeals for the First Circuit

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Case Number: 26-1346

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Docket Text:

MOTION for injunction pending appeal filed by Appellant Imre Kifor. Served on 05/12/2026. [26-1346] (IK)

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666 Document Description: Main Document

Original Filename: 01-Emergency-Motion-For-Injunction.pdf

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[STAMP acecfStamp_ID=1104935054 [Date=05/12/2026] [FileNumber=6809309-0] [5755886d58ecf644912eb361db2351489c94ea498f22f9f87660bd1f9f01084b4243a56d0c176e1c05a999efdfb28799a4f1de66de2bd0b5ef6952c962fb4479]]

666 Document Description:

Original Filename: Exhibit-1_Redacted.pdf

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[STAMP acecfStamp_ID=1104935054 [Date=05/12/2026] [FileNumber=6809309-1] [7d65de3f3c1238c8631b9d72c04833c1ad4c759b2c23f4b84f4aee9e1e50682f1a48bfdffbed8b866b6f21fbf9b63305af4e2a81dfdfa4b2314bba5daa6c57f3]]

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[STAMP acecfStamp_ID=1104935054 [Date=05/12/2026] [FileNumber=6809309-2] [5daa3d69d7e66a1870d96befa0cd58ee50f19d0cdb5d417aba4a00bdd685ac4099e5a08d5a1e7d9c38d9f763c317622b781f3c6cacf1345eabd7fa7eefff1d87]]

UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

IMRE KIFOR,

Appellant,

v.

THE COMMONWEALTH OF
MASSACHUSETTS, et al.,

Appellees.

No. 26-1346

(On Appeal from the U.S. District
Court for the District of Mass., No.
1:25-cv-11831-AK, Kelley, J.)

**APPELLANT'S EMERGENCY MOTION FOR INJUNCTION PENDING
APPEAL UNDER FED. R. APP. P. 8(a)(2) AND THE ALL WRITS ACT, 28
U.S.C. § 1651(a), AGAINST CONTINUED MASSACHUSETTS PROBATE
AND FAMILY COURT (MIDDLESEX) AND DEPARTMENT OF REVENUE
/ CHILD SUPPORT ENFORCEMENT MAILING-OF-JUDGMENT AND
BILLING CONDUCT DIRECTED TO [demolished house mailbox]
NEWTON, MA 02464**

I, Imre Kifor, the pro se Appellant in the above-captioned matter, respectfully move this Court for an injunction pending appeal under Fed. R. App. P. 8(a)(2) and the All Writs Act, 28 U.S.C. § 1651(a), enjoining the Massachusetts Probate and Family Court, Middlesex Division (the "Family Court"), and the Massachusetts Department of Revenue, Child Support Enforcement Division (the "DOR/CSE"), from continuing to direct judgments, orders, decisions, and billing notices in

dockets [REDACTED] and [REDACTED] to the demolished/rebuilt-house address at [demolished house mailbox] Newton, MA 02464, and requiring those same agencies, going forward, to use Appellant's verified shelter address of record at Bristol Lodge Men's Shelter, PO Box 541095, Waltham, MA 02453.

This Motion is filed on an emergency basis because, on 5/11/2026 — fourteen days after Appellant's 4/27/2026 hand-delivered Amended Hand-Delivery Certificate notice of address change to the Family Court Registry (this Court's record, Doc 00118438630, Exhibits to ¶ 8 thereof), and one day before this filing — Appellant received, through the courtesy of the owner-occupant/seller of [demolished house mailbox]

two Family Court mailings dated 4/21/2026 and 4/23/2026 directed to that same demolished-and-rebuilt address. Each contains a substantive Family Court decision against Appellant on the parallel post-hearing motion record now before this Court. Each starts a Mass. R. Dom. Rel. P. 52, 59(e), and 60(b) clock; each starts a Mass. R. App. P. 4 clock. Each was mailed to an address from which mail can reach Appellant only by the in-person grace of a single “outsider” — a vector this Court should not be asked to rely on for the integrity of its appellate record.

I. JURISDICTION AND STANDARD

1. This Court has the authority to grant an injunction pending appeal under Fed. R. App. P. 8(a)(2) and, in aid of its appellate jurisdiction over No. 26-1346, under the All Writs Act, 28 U.S.C. § 1651(a). *Cheney v. United States Dist.*

Court, 542 U.S. 367, 380 (2004) (All Writs Act available "where appropriate" to issue extraordinary writs in aid of jurisdiction); *Bl(A)ck Tea Soc'y v. City of Boston*, 378 F.3d 8, 9 (1st Cir. 2004) (reciting the four-factor preliminary-injunction standard the First Circuit applies in this posture).

2. The familiar four-factor standard governs: (a) likelihood of success on the merits; (b) irreparable injury absent the injunction; (c) the balance of equities; and (d) the public interest. *Nken v. Holder*, 556 U.S. 418, 434 (2009); *Acevedo-García v. Vera-Monroig*, 296 F.3d 13, 16 (1st Cir. 2002). Where state action threatens the integrity of the federal appellate record itself, the public-interest factor and irreparable-injury factor merge and weigh heavily in favor of relief.
3. This Motion does not ask this Court to review, reverse, or modify any state-court judgment. It asks this Court to preserve the **mailability** of its own appellate record by requiring the state agencies whose mailing conduct now sits on that record to use the only physical-mail intake at which Appellant can, in fact, receive their mailings. The relief sought is administrative-mailing relief, not merits relief. *Younger v. Harris*, 401 U.S. 37 (1971), is not implicated; *Rooker-Feldman*, *Exxon Mobil Corp. v. Saudi Basic Indus. Corp.*, 544 U.S. 280 (2005), is not implicated; the Eleventh Amendment, under *Ex parte Young*, 209 U.S. 123 (1908), does not bar prospective injunctive relief against state officials in their official capacities for ongoing federal-law violations.

II. THE OPERATIVE RECORD

4. **Appellant's verified mailing address of record.** Since 4/1/2025, Appellant has slept every night at Bristol Lodge Men's Shelter, 27 Lexington Street, Waltham, Massachusetts. The shelter has no street-deliverable mailroom for residents; every resident must use Bristol Lodge PO Box 541095, Waltham, MA 02453. (This Court's record, Doc 00118439659, ¶ 6.) Appellant's 12/27/2025 "Affidavit Verifying His Only Valid Physical Mailing Address" identified the same Bristol Lodge address. (Doc 00118437699; D. Mass. 1:25-cv-11831-AK, Dkt. 28-9.) The U.S. District Court for the District of Massachusetts has adjudicated Appellant's forced-indigency posture on this same record and allowed Appellant to proceed *in forma pauperis* by Order of 3/25/2026 (Hon. Angel Kelley, D.J.), and that Court has accepted the Bristol Lodge address since at least 4/27/2026 (Doc 36 in 1:25-cv-11831-AK).
5. **The 4/27/2026 update and 4/28/2026 over-the-counter chain of custody.** On 4/27/2026, Appellant filed his Status Affidavit in this Court reciting the Bristol Lodge address (Doc 00118437697 / Entry ID 6804893). On 4/28/2026, Appellant hand-delivered to the Middlesex Probate and Family Court Registry, at the Lowell Justice Center, a paper companion bundle bearing the same Bristol Lodge address and Amended Hand-Delivery Certificates carrying the Registry's over-the-counter stamps. (This Court's record, Doc 00118438630, ¶¶

7–10.) The Registry's stamped copies of the Amended Hand-Delivery Certificate — one per Family Court docket, each face-stamped FILED APR 28 2026 — are preserved in Appellant's contemporaneous record and are referenced in Appellant's 4/28/2026 Status Affidavit in this Court.

6. **The 4/29/2026 DTA Connect written manifestation of the Massachusetts no-PO-Box rule.** The next morning — 4/29/2026 — the Massachusetts Department of Transitional Assistance ("DTA"), the agency that administers Appellant's federal SNAP benefits, rejected Appellant's DTA Connect residential-address update with the verbatim on-screen message: "Your residential address is where you live and cannot be a PO Box." (This Court's record, Doc 00118439659, ¶¶ 3–5 and Exhibit 1, Enclosures C-1 / C-2 / C-3.) That rule fires on any "PO Box" string. It operationally constrains the residential-address line of every Massachusetts agency that touches an indigent litigant, reads — including the Family Court Registry and the DOR/CSE.
7. **The 4/23/2026 DOR/CSE bill still addressed to [demolished house mailbox]** On or about 4/23/2026, six days *before* DTA Connect manifested the no-PO-Box rule in writing, and more than fourteen months after the [demolished house mailbox] structure was demolished on 2/12/2025, the DOR/CSE (PIN [REDACTED]) mailed Appellant a Lockbox Bill (Billing Period 4/17/2026 to 4/23/2026; Total Due \$208,172.00) addressed to "IMRE KIFOR, [demolished house mailbox],

NEWTON, MA 02464-1209." (This Court's record, Doc 00118439659, ¶ 11.)

That bill did not, and could not, reach Bristol Lodge through the U.S. Postal Service. Appellant received it only because of the four-month daily-monitored mail-pickup discipline he maintained at [demolished house mailbox] through the kindness of the owner-occupant/seller — a discipline this Court should not now be asked to assume will continue.

8. **The 2/18/2026 Family Court mail-fraud documentary impeachment.** This Court already has on its record (Doc 00118439659, ¶¶ 8–10) the 2/18/2026 documentary impeachment of the Family Court Registry's "All copies were mailed out on 2-13-26" representation. The 2/10/2026 Lee judgment envelope bore a Pitney Bowes meter / USPS franking marked "18 FEB 2026" — five days *after* the Registry's record-stated mailing-out date. Appellant could not have made that documentary impeachment had he been on the Bristol Lodge PO Box on 2/18/2026; PO Boxes batch mail at the post office, not at a continuously-observed street mailbox. The same Massachusetts no-PO-Box pressure that DTA Connect now manifests in writing, and that is mirrored in DOR/CSE notice handling, was therefore the very mechanism that — but for Appellant's four-month documentary discipline at [demolished house mailbox] — would have ensured the silent expiration of Appellant's Mass. R.Dom.Rel. P. 52, 59(e), and 60(b) clocks on the 2/10/2026 modification judgment, and the

loss of all further appellate rights. Mass. R. App. P. 4(a)(2)(B) (effective 10/17/2025) is what now safeguards the timely notices of appeal that were issued in this window; without the 2/18/2026 proof, even Rule 4(a)(2)(B) would not have been triggered.

III. THE 5/11/2026 FRESH-HARM TRIGGER

9. **Two Family Court decisions dated 4/21/2026 and 4/23/2026 were mailed to the demolished/rebuilt-house address.** On 5/11/2026, fourteen days after the 4/27/2026 over-the-counter Amended Hand-Delivery Certificates were stamped FILED at the Middlesex Registry, the owner-occupant/seller of ^[demolished house mailbox] delivered to Appellant — in person, "one last time" — two pieces of Family Court mail. The two envelopes bear mailing dates of 4/21/2026 and 4/23/2026. Each contains a substantive Family Court decision adverse to the Appellant on the parallel post-hearing motion record now before this Court on appeal. Each is addressed to "Imre Kifor, ^[demolished house mailbox] Newton, MA 02464." Both were mailed *after* Appellant's 4/27/2026 written notice of address change (Doc 00118437697) and *after* the 4/28/2026 over-the-counter delivery of the Amended Hand-Delivery Certificates to the Middlesex Registry.
10. **The continuing pattern is now structurally confirmed.** On 5/11/2026, fully two weeks past the over-the-counter Registry-stamped notice of address change on every parallel Family Court docket, the same Massachusetts no-PO-Box

pressure that operated on Appellant's parallel state-court submissions through 10/6/2025 (cf. *Kifor v. Massachusetts*, No. 25-6878 — address line on the front page of the dismissed petition), on the 2/18/2026 Family Court mail-fraud sequence, on the 4/23/2026 DOR/CSE Lockbox Bill, and on the 4/29/2026 DTA Connect rejection, continues to operate on the Family Court Registry's mailing-of-judgment workflow. The pattern is no longer a single-instance anomaly that prudence at [demolished house mailbox] could correct; it is a continuing administrative refusal whose immediate effect is to deprive Appellant of timely notice of state-court decisions whose review this Court will, in due course, be asked to undertake.

11. **The 5/11/2026 email contemporaneously preserves the fact.** On 5/11/2026 at 5:49 PM, Appellant emailed counsel of record — Massachusetts Attorney General c/o J. David Hampton (AAG), Katherine B. Dirks (Deputy Chief, Government Bureau), Joseph P. Lucia (AAG), [REDACTED] (DOR/CSE), [REDACTED] Esq. (counsel for Mother-B), [REDACTED] (pro se) — and copied the U.S. Attorney for the District of Massachusetts (Leah B. Foley, DOJ Civil Rights), as well as the Middlesex Probate Registry and [REDACTED] [REDACTED] attaching the photographs and contents of the two mailings and stating that "the Family Court is deliberately conspiring to conceal and obstruct justice by knowingly refusing to update the public court dockets and knowingly

mailing decisions to addresses declared 'undeliverable.'" A redacted copy of that email and its attachments is filed herewith as **Exhibit 1**.

IV. LIKELIHOOD OF SUCCESS ON THE MERITS

12. The merits before this Court in No. 26-1346 are the constitutional and statutory infirmities of the District Court's 3/26/2026 Dismissal Order, 3/31/2026 Enjoinment Order, and ancillary orders, and Appellant's federal civil-rights claims preserved therefrom. *That* merits posture is the subject of Appellant's principal brief (Doc 00118432189) & the bound 11-volume Record Appendix.
13. The merits relevant to *this* Motion are narrower: whether prospective injunctive relief lies, against state agencies acting under color of state law, to enjoin a continuing administrative practice that — as the record now establishes — deprives a federally-IFP-adjudicated indigent shelter-resident litigant of timely notice of state-court orders directly material to his pending federal appeal. On that narrower posture, the merits standard is comfortably satisfied:
 - a) *Ex parte Young*, 209 U.S. 123 (1908), authorizes prospective injunctive relief against state officials in their official capacities for ongoing federal-law violations. The Eleventh Amendment is not a bar.
 - b) The Fourteenth Amendment's Due Process Clause forbids the State from depriving a litigant of a meaningful opportunity to be heard. *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 314 (1950) ("notice

reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections"); *Jones v. Flowers*, 547 U.S. 220 (2006) (when state has reason to know notice has failed, additional steps are constitutionally required). The mailing-to-demolished-house conduct at issue here is, on its face, "not reasonably calculated" to apprise Appellant of anything; the State has both actual and record knowledge that [de mol ished] is undeliverable; the 5/11/2026 mailings, by their dates and addresses, refuse the very additional step *Jones v. Flowers* requires.

- c) The First Amendment's right of access to the courts is impaired when a state administrative practice forecloses the practical capacity to receive, and timely respond to, state-court orders on appeal. *Bounds v. Smith*, 430 U.S. 817 (1977); *Lewis v. Casey*, 518 U.S. 343 (1996). An indigent appellant cannot exercise the appellate right Massachusetts itself provides if the State's own mailing workflow systematically routes appealable orders to a structure that no longer exists.
- d) The Equal Protection Clause is impaired when an indigent shelter-resident litigant is subjected to a notice regime materially less adequate than the regime applied to a similarly situated address-of-record litigant.

Griffin v. Illinois, 351 U.S. 12 (1956); *M.L.B. v. S.L.J.*, 519 U.S. 102 (1996).

14. Section 1983 supplies the cause of action; 42 U.S.C. § 1985(3) supplies the conspiracy cause of action against the coordinated multi-agency pattern. Both are independently available for prospective injunctive relief against state officials.

V. IRREPARABLE INJURY

15. **Loss of timely state-court notice translates into loss of federal-court remedy.** The four-month documentary discipline at [demolished house mailbox] that produced the 2/18/2026 mail-fraud impeachment has now ended. The owner-occupant/seller of [demolished house mailbox] expressly informed Appellant on 5/11/2026 that the 5/11/2026 hand-off was "one last time." After 5/11/2026, mail directed to [demolished house mailbox] will go to the U.S. Postal Service's undeliverable-mail process; Appellant will not see it; the 10-day Rule 52 / 59(e) clocks will run silently; the 30-day Rule 4 NOA clocks will run silently; the integrity of this Court's appellate record will be impaired without notice to either Appellant or to this Court.
16. **The harm is, *per se*, irreparable.** An appellate clock that has expired cannot be recovered. *Bowles v. Russell*, 551 U.S. 205 (2007). A judgment that has become unappealable cannot, by any later motion, be reopened on the same

record. The injury here is the very injury that Rule 8(a) injunctions pending appeal are designed to prevent: the silent erosion, through state administrative conduct, of the appellate-clock framework that defines the scope and timing of this Court's own work.

17. **The harm is documented and ongoing.** Five separate Massachusetts administrative events — the 2/18/2026 Family Court mail-fraud meter-impeachment; the 4/23/2026 DOR/CSE Lockbox Bill; the 4/29/2026 DTA Connect rejection; the 5/11/2026 receipt of two 4/21/2026 and 4/23/2026 Family Court decisions at [demolished house mailbox] and the Massachusetts no-PO-Box pressure that reached the public record of the Supreme Court of the United States on the address line of *Kifor v. Massachusetts*, No. 25-6878 — establish that the pattern is not a Family Court anomaly. It is the operating practice of multiple Massachusetts agencies. Absent the relief requested, the next iteration will fall not on Appellant's monitored mailbox at [demolished house mailbox] but into the U.S. Postal Service's undeliverable-mail process.

VI. BALANCE OF THE EQUITIES AND THE PUBLIC INTEREST

18. The balance of equities tilts decisively for Appellant. The relief requested costs the Family Court Registry and the DOR/CSE nothing more than the change of a single field — already mandated by this Court's record and by 4/27/2026 written-and-stamped notice — in the public docket service rosters. It imposes

no burden, no expense, no delay; it merely requires what every state agency that interacts with the U.S. Postal Service routinely does on a litigant's written notice of address change.

19. The public interest, on the other hand, weighs heavily in favor of the Appellant.

The integrity of federal-court appellate jurisdiction over state-court administrative conduct that touches indigent litigants is of unmistakable public importance; the access-to-courts and equal-protection authorities already cited at ¶ 13(b)–(d) supply the doctrinal anchor, and *New Comm Wireless Servs., Inc. v. SprintCom, Inc.*, 287 F.3d 1, 8–9 (1st Cir. 2002), confirms that the public-interest factor in this Circuit asks how "the granting or denial of an injunction will interact with the public interest." Indigent shelter-resident litigants are a defined class for whom the appellate-clock framework is structurally fragile; what protects them protects every Massachusetts indigent litigant whose only physically deliverable address is a homeless-shelter PO Box.

20. Finally, the relief requested does not interfere with any pending state-court adjudication. Family Court remains free to decide; the DOR/CSE remains free to bill; the only thing they are enjoined from doing is mailing those decisions and bills to an address from which they cannot, in fact, reach Appellant.

VII. RELIEF REQUESTED

21. Appellant respectfully requests that this Court enter an Order:

- (a) Enjoining the Massachusetts Probate and Family Court, Middlesex Division, and the Massachusetts Department of Revenue, Child Support Enforcement Division, from directing any judgment, order, decision, decree, notice, bill, or other mailing in dockets [REDACTED] [REDACTED] and [REDACTED] or under PIN [REDACTED], to the address [demolished house mailbox] Newton, MA 02464;
- (b) Requiring those same agencies to direct any such mailing, going forward, to Appellant's verified mailing address of record at Bristol Lodge Men's Shelter, PO Box 541095, Waltham, MA 02453, and to update their public docket service rosters and billing systems accordingly within seven (7) days of the Order;
- (c) Requiring those same agencies to file, within fourteen (14) days of the Order, a written representation to this Court confirming compliance with subparagraphs (a) and (b);
- (d) In aid of the foregoing, ordering the U.S. Marshals Service to effect service of this Court's Order on the Massachusetts Attorney General (c/o J. David Hampton, AAG; Joseph P. Lucia, AAG; Katherine B. Dirks, Deputy Chief, Government Bureau), on the Middlesex Probate and Family Court Registry, and on the DOR / CSE; and

(e) Granting such other and further relief as this Court deems just and proper.

22. **Request for expedited consideration.** Because the owner-occupant/seller of [demolished house mailbox] has informed Appellant that the 5/11/2026 hand-off was "one last time," and because the Commonwealth's appellees' brief is due 5/18/2026, Appellant respectfully requests that this Court rule on the present Motion on an expedited basis under Loc. R. 27.0(g) and Fed. R. App. P. 27(b).

VIII. VERIFICATION

23. I declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746, that the factual statements made herein are true and correct on personal knowledge, and that the documentary references made herein are accurate as to docket numbers, document numbers, dates, and content.

IX. EXHIBIT

24. **Exhibit 1** — Redacted copy of Appellant's 5/11/2026 5:49 PM email to counsel of record and copied to U.S. Attorney Leah B. Foley (DOJ Civil Rights Division), with the two pieces of Family Court mail dated 4/21/2026 and 4/23/2026 received from the new owner-occupant of [demolished house mailbox] on 5/11/2026 attached and described; together with the contemporaneous Appellant's

"Affidavit on Public-Service Efforts and the Public Donation Drive" of identical date filed herewith.

X. SERVICE

25. Appellant is this day serving copies of this Emergency Motion (with Exhibit 1)

by electronic mail on counsel of record for the appellees and on opposing

parties: Andrea Joy Campbell, Attorney General of Massachusetts, c/o

Katherine B. Dirks (katherine.dirks@mass.gov), J. David Hampton

(david.hampton@mass.gov), and Joseph P. Lucia (joseph.lucia@mass.gov);

Leah B. Foley, U.S. Attorney for the District of Massachusetts (DOJ Civil

Rights Division), at USAMA.CivilRights@usdoj.gov; Massachusetts

Department of Revenue, Child Support Enforcement, at

████████████████████, c/o ██████████ ██████████ at ██████████;

████████████████████ Esq. (counsel for ██████████ ██████████ at ██████████);

and ██████████ ██████████ Pro Se, at ██████████.

26. Service is by electronic mail due to forced indigency, which the U.S. District Court (Hon. Angel Kelley, J.) adjudicated on 3/25/2026 by allowing Appellant's motion to proceed in forma pauperis in No. 1:25-cv-11831-AK.

Signed under the pains and penalties of perjury.

Executed on May 12, 2026.

/s/ Imre Kifor

Imre Kifor, Pro Se

Bristol Lodge Men's Shelter

PO Box 541095

Waltham, MA 02453

(forcedly indigent — only deliverable
mailing address available to Appellant)

ikifor@gmail.com

(857) 340-8699 (Lifeline)

I have no valid driver's license

<https://quantapix.com> & <https://femfas.net>

<https://github.com/quantapix>

UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

IMRE KIFOR,

Appellant,

v.

THE COMMONWEALTH OF
MASSACHUSETTS, et al.,

Appellees.

No. 26-1346

(On Appeal from the U.S. District
Court for the District of Mass., No.
1:25-cv-11831-AK, Kelley, J.)

**APPELLANT'S AFFIDAVIT ON PUBLIC-SERVICE EFFORTS AND THE
PUBLIC DONATION DRIVE — IN SUPPORT OF HIS EMERGENCY
MOTION FOR INJUNCTION PENDING APPEAL FILED OF EVEN DATE**

I, Imre Kifor, the pro se Appellant in the above-captioned matter, declare and state on personal knowledge under 28 U.S.C. § 1746 as follows:

I. IDENTITY AND ADDRESS OF RECORD

1. I am Imre Kifor, the pro se Appellant in U.S. Court of Appeals for the First Circuit No. 26-1346 and the pro se Plaintiff in Probate and Family Court (Middlesex Division) docketed [REDACTED] and [REDACTED]

[REDACTED] I make this affidavit on personal knowledge in support of my Emergency

Motion for Injunction Pending Appeal in No. 26-1346 and of my parallel Renewed Complaints for Modification in dockets [REDACTED] and [REDACTED] / [REDACTED]

2. My only operative mailing address is Bristol Lodge Men's Shelter, PO Box 541095, Waltham, MA 02453. The U.S. District Court for the District of Massachusetts adjudicated my forced-indigency posture on this record and allowed my motion to proceed *in forma pauperis* on 3/25/2026 in No. 1:25-cv-11831-AK (Hon. Angel Kelley, D.J.). I have slept every night, sleep-only, at Bristol Lodge Men's Shelter since 4/1/2025.

II. THE SIX-MONTH PUBLIC-SERVICE SOFTWARE-ENGINEERING EFFORT

3. Beginning on or about 4/28/2026 — the day after my Status Affidavit in No. 26-1346 was docketed (Doc 00118437697) and the day I hand-delivered the parallel state-court paper companion bundle to the Middlesex Probate and Family Court Registry (Doc 00118438630, Exhibit at ¶ 8 et seq.) — I have dedicated my available labor to a six-month full-time public-service software-engineering effort. The work is described, in published form, at the following public surfaces:

- (a) <https://quantapix.com> — the engineering organization's home site, presenting the architecture, the published commitments, and the current build status across every subproject;
- (b) <https://femfas.net> — the companion site presenting the same engineering work in a public-interest framing oriented at indigent litigants and other underserved court users;
- (c) <https://github.com/quantapix> — the public source-code journal, in which my engineering work over the six-month window is committed and timestamped; this GitHub journal is the going-forward record-substrate that replaces the weekly job-application bcc'd series I previously maintained (closing snapshot: 3,050+ fully compliant submitted job applications since 2019, anchored on the federal record).

4. The work product consists of:

- (a) **the *qagents* framework**, an open-source verification system whose first two consumer applications are *Qnarre* (a legal-complaint verifier — accepting a redacted complaint as input and returning a verification trace against axiomatized statutory predicates) and *Qresev* (a portfolio/risk evaluator, of the same shape, for financial-domain inputs);
- (b) **a Lean4-axiomatized federal and Massachusetts statutory base**, each section carrying a one-line statutory citation that resolves against the

canonical U.S. Code mirror used by the framework; coverage in scope at v1 includes civil RICO (18 U.S.C. § 1962), Title VI / VII (42 U.S.C. §§ 2000d / 2000e), 42 U.S.C. §§ 1981 / 1983 / 1985(3), with a started Massachusetts General Laws set landing during the six-month window;

- (c) **a live AWS-hosted verification service**, at qnarre.quantapix.com (legal-complaint verifier) and qresev.quantapix.com (portfolio evaluator), each accepting only redacted input documents and returning a verification trace streamed back over a server-sent-events channel.

5. The framework is built **with** the expert assistance of Claude Code AI (Anthropic PBC), in plain view of any reviewer. The conventions and the development memory trail — including which decisions were rejected and why — are published alongside the source code on github.com/quantapix. As one indigent pro se "team" — a single developer with AI assistance — I am, in parallel, releasing early-beta versions of the two applications. The work is professional and lawful work product; nothing in it is prepared for any improper purpose.

III. THE PUBLIC DONATION DRIVE (2026-06-01 → 2026-12-01)

6. On or before 6/1/2026, I am opening a public donation drive — under the working name "qagents public donation drive" — to fund the six-month public-service window. The drive's authoritative source document, dated 2026-05-12

and to be published on or before 6/1/2026 at quantapix.com and femfas.net with reciprocal links from github.com/quantapix, recites the following:

- (a) **Why the drive exists.** Pro se federal and state litigation work has surfaced a structural problem in the public record: court proceedings are difficult to verify against the statutes and rules that bound them. The *qagents* framework addresses that problem by axiomatizing the relevant federal and state code as Lean4 theorems backed by LLM-evaluated predicates, then exposing the verification engine as a redacted-input web service.
- (b) **Three concrete promises.** (1) An open-sourced, redacted *qagents* codebase, refreshed at least weekly, on github.com/quantapix. (2) A Lean4-axiomatized federal and Massachusetts statutory base, each USC and MGL section in scope, machine-checkable. (3) A running AWS-hosted verification service at qnarre.quantapix.com and qresev.quantapix.com, accepting only redacted input documents. A privacy floor — no real names, dockets, addresses, financial account numbers, or other PII — gates every accepted document.
- (c) **Four exclusive-use cost buckets.** (1) Claude Max20 subscription at \$200 / month; (2) Midpage Legal MCP subscription at \$100 / month; (3) AWS billing, variable, billed as used; (4) federal docketing fees, variable,

itemized per docket. Each bucket has a fixed exclusive use; cross-bucket movement is not allowed. Indicative six-month total at fixed buckets only: $\$300 / \text{month} \times 6 = \$1,800$; AWS billing and federal docketing fees add a variable layer that the monthly ledger reports as actuals.

(d) **Accountability.** A monthly public ledger posts within 5 calendar days of each month-end, reporting (i) total inflow that month broken out by channel with channel-side receipt IDs, (ii) per-bucket outflow with receipts, (iii) carryover, and (iv) one paragraph of progress per promise pointing at specific commits, deploys, or filings. A missed or late ledger is itself a daily-watcher finding.

(e) **Channels.** GitHub Sponsors and OpenCollective. Both channels are linked from every banner and from each monthly ledger header.

7. **Out of scope.** The drive does **not** fund: (a) legal fees or attorney retainers — the litigation work remains entirely pro se; (b) housing or personal subsistence — those are not in any bucket; (c) one-time hardware purchases — none planned in the six-month window. If the drive over-funds the fixed buckets, the excess flows into bucket (3) AWS billing and bucket (4) federal docketing fees, and is reported as such on the monthly public ledger. No inflow reaches me personally. My personal income remains approximately $\$298 / \text{month}$ in federal SNAP benefits.

8. **The drive is the credibility source for the public-service work, not the income source for me.** I draw no salary, no stipend, and no honorarium from the drive. The four buckets pay for the *tools* of the engineering work — the AI assistants, the legal-research MCP, the AWS platform, the federal docketing fees — and nothing more.

**IV. THE 5/11/2026 MAILING-FAILURE PROOF AND ITS
CONTEMPORANEOUS PRESERVATION**

9. On 5/11/2026, the owner-occupant/seller of [demolished house mailbox] delivered to me, in person and "one last time," two pieces of Family Court mail directed to me at that address. The two envelopes carry mailing dates of 4/21/2026 and 4/23/2026. Each contains a substantive Family Court decision adverse to me on the parallel post-hearing motion record now before the U.S. Court of Appeals for the First Circuit on appeal in No. 26-1346 and before the Probate and Family Court on the pending merits of my 2/12/2026 and 2/22/2026 motions.
10. The 4/21/2026 and 4/23/2026 mailing dates **post-date** my 4/27/2026 written notice of address change (USCA1 No. 26-1346, Doc 00118437697) and **post-date** the 4/28/2026 over-the-counter Registry stamping of my Amended Hand-Delivery Certificates on every parallel docket (USCA1 No. 26-1346, Doc 00118438630, ¶¶ 7–10).

11. On 5/11/2026 at 5:49 PM I sent an email titled "Further clear evidence that the Family Court is deliberately conspiring to conceal fraud on the court and to obstruct justice" — addressed to the Middlesex Probate Registry and Tara E. Melo, J. David Hampton (AAG), Katherine B. Dirks (Deputy Chief, Government Bureau), Joseph P. Lucia (AAG), [REDACTED] [REDACTED] (DOR / CSE), [REDACTED] [REDACTED] Esq. (counsel for [REDACTED] [REDACTED] [REDACTED] (pro se), and [REDACTED] [REDACTED] copied to the U.S. Attorney for the District of Massachusetts (DOJ Civil Rights Division). The email contemporaneously preserves the fact, attaches the two pieces of mail and the 4/29/2026 anchor of my GitHub journal series, and announces my intent to file a new notice of direct appeal for the two newly-received decisions and to seek interlocutory appellate relief on the DOR / CSE address question. A redacted copy of that email — with the Bcc field, PIN field, and other personally-identifying material redacted in accordance with the privacy floor I maintain across every public surface — is filed as an Exhibit to my Emergency Motion for Injunction Pending Appeal in USCA1 No. 26-1346, and is incorporated by reference into the parallel Renewed Complaints for Modification on the state-court dockets.

V. OPERATIVE EFFECT ON FINANCIAL CAPACITY

12. My financial capacity to pay any periodic support order during the 2026-06-01 → 2026-12-01 public-service window is, in operative fact, zero. My only

income is the federal SNAP allotment of approximately \$298 / month, which, by federal regulation, may be used only for groceries and certain household items. I have \$0.71 cash on hand. I have no savings, no checking account, no credit account, no telephone other than the federal Lifeline program, no valid driver's license, and no ownership interest in any real or personal property.

13. The donation drive does not change paragraph 12. The drive's four exclusive-use buckets cover the *tools* of the public-service engineering effort; they do not cover, and are forbidden by their own published terms from covering, my personal subsistence. I do not draw on the drive's inflows. The monthly public ledger will record every dollar in and every dollar out, with receipts, on the same public surface that this affidavit cites.

VI. RELATIONSHIP TO OTHER PENDING MATTERS AND TO THIS COURT'S RECORD

14. **Nothing in this affidavit revises any factual representation made in any earlier-filed paper in any docket.** My 4/28/2026 Status Affidavit in USCA1 No. 26-1346 (Doc 00118437697) and 4/30/2026 Status Affidavit (Doc 00118439659) remain operative; this affidavit supplements them with the 5/11/2026 development and with the affirmative content of the public donation drive. My 4/30/2026 Affidavit of Imre Kifor on the Updating of His Mailing Address of Record in U.S. District Court (MBD) No. 1:26-mc-91166-DJC

(Doc 3 therein) remains operative; this affidavit supplements it with the 5/11/2026 development.

15. The applications referenced herein — *Qnarre* (legal-complaint verifier) and *Qresev* (portfolio evaluator) — are referenced only because they are part of the same dated documentary record that this affidavit reports, and because the 6/1/2026 drive opening date is the operative anchor for the public donation drive's continued accountability. They are professional and lawful work products. They are not legal representation; the litigation work remains entirely pro se.

VII. NO IMPROPER PURPOSE

16. The factual statements made herein are made for the purpose of (a) supporting the relief requested in my Emergency Motion for Injunction Pending Appeal in USCA1 No. 26-1346; (b) supporting the relief requested in my Renewed Complaints for Modification in Probate and Family Court dockets [REDACTED] and [REDACTED] / [REDACTED] and (c) preserving on every record on which my litigation now sits the contemporaneous fact of the 5/11/2026 receipt of two 4/21/2026 and 4/23/2026 Family Court decisions at the demolished-and-rebuilt [demolished house mailbox] address. No part of this affidavit is made for any other purpose.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 12, 2026.

/s/ Imre Kifor

Imre Kifor, Pro Se

Bristol Lodge Men's Shelter

PO Box 541095

Waltham, MA 02453

(forcedly indigent — only deliverable
mailing address available to Appellant)

ikifor@gmail.com

(857) 340-8699 (Lifeline)

I have no valid driver's license

<https://quantapix.com> & <https://femfas.net>

<https://github.com/quantapix>