Imre Kifor, Pro Se
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PO Box 541095
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ikifor@gmail.com
(857) 340-8699
(by the federal Lifeline program)
I have no valid driver's license
I sleep in a homeless shelter
https://femfas.net and https://quantapix.com
https://github.com/quantapix

May 20, 2026

Chief Justice Amy Lyn Blake
Massachusetts Appeals Court
John Adams Courthouse
One Pemberton Square, Room 1200
Boston, MA 02108

c/o Paul Little, Clerk of the Massachusetts Appeals Court

**Re: Renewed request that the Appeals Court (a) relay Father's parallel Second Amended Notice of Appeal to the Middlesex Probate and Family Court under Mass. R. A. P. 4(a)(1)(B), and (b) order the three parallel Family Court appeals assembled and docketed under Mass. R. A. P. 9(a)(2) and the erased record rectified under Mass. R. A. P. 8(e)(1) — the Family Court having continued to strip and erase every record submission, including the Registry-stamped April 28, 2026, hand-delivery certificate**

Dear Chief Justice Blake,

1. This letter follows my letter to you of March 7, 2026. In that letter, I asked the Appeals Court, pursuant to Mass. R. A. P. 4(a)(1)(B) ("Mistaken Filing in the Appellate Court"), to relay to the Middlesex Probate and Family Court two parallel First Amended Notices of Appeal that the Family Court's e-filing system had refused, with the message "Notice of appeal cannot be e-filed." The Appeals Court's relay worked: within two days, on March 9, 2026, the Family Court docketed all three of my parallel notices of appeal. I write again because the obstruction that made the March 7 letter necessary has not stopped — it has escalated — and because the Appeals Court itself has now, in its May 19, 2026 decision, directed me to seek review elsewhere.

2. On May 19, 2026, the panel of Massing, Ditkoff, and Hand, JJ., entered its Rule 23.0 decision in my pending appeal No. 2025-P-0855, affirming the Superior Court's judgment in No. [redacted] and stating that, "[i]f dissatisfied with the rulings of the Massachusetts courts, the plaintiff can seek review

by the United States Supreme Court." I am preparing that petition. But No. 2025-P-0855 was the appeal of the Superior Court's certiorari judgment. It was not — and could not have been — the three direct Family Court appeals, Docket Nos. [redacted], for which I filed timely notices of appeal on May 16 and May 19, 2025, and which the Appeals Court relayed to the Family Court on March 9, 2026. Those three appeals still carry no Appeals Court docket numbers, for one reason only: the Register of Probate has never assembled or transmitted their records, even though Justice [redacted] allowed assembly of the record on October 17, 2025.

3. The reason the Family Court provides me with no assembled record is that the Family Court does not keep my record — it removes it. Between January 23 and April 28, 2025, across six successive e-filing dates, I e-filed my 437-item Request for Admissions — the uncontested factual core of these cases — in eighteen parallel envelopes, three per filing date, seventy-seven to eighty-one pages per envelope. On every one of those dates, and on each of the three parallel dockets, the Registry reduced the envelope to a two-page docket entry. The Commonwealth's own e-filing vendor proves this. Each Tyler "Filing Submitted" receipt carries an Odyssey-generated "Download Document" link, stated on the receipt's own face to be "active for 548 days." Computed from the submission dates, those links remain live today, and each one still retrieves the complete seventy-seven-to-eighty-one-page envelope exactly as I transmitted it. The Combined Record Appendix that the Appeals Court accepted for filing in No. 2025-P-0855 on August 27, 2025, records the same fact in its own Table of Contents, which uses the word "Erased" to describe the March 20, 2025, admission sets.

4. The erasure is not limited to electronic filing. On April 28, 2026, I hand-delivered to the Register, in paper, an Amended Hand-Delivery Certificate whose Section II itemized, line by line, the nine-item, 793-page paper bundle I delivered that day; the Register applied the "FILED APR 28 2026" stamp to it. The copy the Family Court has docketed has Section II — the itemized list of exactly what I delivered — stripped out. Whether I file electronically or on paper, the Family Court keeps the stamp and removes the contents.

5. Because of this, and consistent with the procedure that succeeded on March 7, 2026, I respectfully submit the enclosed documents to the Appeals Court and ask the Court to take the following three actions:

(a) Under Mass. R. A. P. 4(a)(1)(B), relay the enclosed parallel Second Amended Notice of Appeal — covering Docket Nos. [redacted], and [redacted] — to the Clerk of the Middlesex Probate and Family Court, noting the date of receipt, so that it is deemed filed in that court on the date so noted, exactly as the Appeals Court did with my First Amended Notices on March 9, 2026. **This request is time-sensitive**. The Second Amended Notice of Appeal adds to the appeal the April 21 and April 23, 2026, denial orders of [redacted] and [redacted] JJ. The thirty-day appeal period for the earlier (April 21, 2026) order runs to May 21, 2026. I am submitting this Notice to the Appeals Court, in person, on May 20, 2026 — within that period — precisely so that, under Rule 4(a)(1)(B), the date the Appeals Court notes as the date of receipt falls within the appeal period; I respectfully ask that the date of receipt be noted and the Notice transmitted accordingly.

(b) Under Mass. R. A. P. 9(a)(2) — which provides that "the appellate court or a single justice thereof may order the record to be assembled, and the appellate court or a single justice thereof

may order the appeal to be docketed, at any time" — order the records of the three direct Family Court appeals assembled and those appeals docketed in the Appeals Court. The Register has had Justice [redacted] October 17, 2025, assembly allowance in hand for more than seven months without assembling or transmitting anything.

(c) Under Mass. R. A. P. 8(e)(1) — which provides that, where anything material is omitted from the record, "the appellate court or a single justice may direct that any omission be rectified," and which is the very rule the Court Transcription Services Supervisor quoted to me on May 18, 2026 — direct that the omitted Request for Admissions be added to the record. The proof the Court would need is already in the Court's own possession: it is in the Combined Record Appendix filed in No. 2025-P-0855, and it is itemized and attached, together with the Tyler receipts, in the enclosed Rule 60(a) Motion to Correct the Record.

6. I enclose the parallel Rule 60(a) Motion for Permission and Motion to Correct the Record because they are trial-court motions that I have been unable to place, intact, before the Family Court. I do not ask the Appeals Court to decide them. There is one further reason they are enclosed. On May 19, 2026, the single justice ([redacted] J.) dismissed my parallel petitions for interlocutory relief in Nos. [redacted] and [redacted] — which sought review of the Family Court's implicit denial of my homeless-shelter PO Box as a valid address of record — for want of jurisdiction, holding that I had "not filed this request for relief in the Probate Court, and thus there is no order for review." The enclosed Motion to Correct the Record is that request: its prayer (b) asks the Family Court, under Rule 60(a), to correct my address of record, and so supplies the predicate the single justice identified as missing. I ask the Court to accept the two motions as the documentary offer of proof supporting the requests in paragraph 5(b) and (c) above, and, if the Court sees fit, to transmit copies to the Register together with the relayed Second Amended Notice of Appeal, so that the complete record of what I have tried to file is, for once, before a court that keeps it.

7. Every other court and office in these matters keeps my record. The United States Court of Appeals for the First Circuit holds the eleven-volume Combined Record Appendix in No. 26-1346; this Appeals Court has held the nine-volume version in No. 2025-P-0855 since August 2025; the United States District Court, the Office of the Attorney General, and the certified transcriptionist all correspond with me at my shelter address. Only the Middlesex Probate and Family Court strips what I deliver. I respectfully ask the Appeals Court to relay, to assemble, and to docket, so that the three parallel appeals I noticed a year ago can at last be reviewed on a record that reflects what I actually filed.

Respectfully,

/s/ Imre Kifor[1], Pro Se
Imre Kifor, Pro Se
Bristol Lodge Men's Shelter
PO Box 541095
Waltham, MA 02453

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[1] Signed under the pains and penalties of perjury as an affidavit in support of my federal Complaint for Declaratory and Injunctive Relief and Damages for violations of Title VI and Title VII of the Civil Rights Act of 1964.

**Enclosures**:

1. Imre Kifor's Second Amended Notice of Constitutional Questions-Raising Direct Appeal of All Parallel Judgments, Decrees, and Orders (parallel — [redacted]).
2. Imre Kifor's Parallel Motion for Permission to File a Motion to Correct the Record Under Mass. R. Dom. Rel. P. 60(a) and for Evidentiary Hearing Under Standing Order 2-99(b)(2).
3. Imre Kifor's Parallel Motion to Correct the Record Pursuant to Mass. R. Dom. Rel. P. 60(a), with Exhibits A–O (including the Tyler/Odyssey e-filing receipts for the six 2025 admission-set filing dates and the Combined Record Appendix Table of Contents, Volumes I–IX).

The 408-page Memorandum of Facts and Law that the Second Amended Notice of Appeal incorporates by reference is already on file with this Court, identically, in both parallel dockets Nos. [redacted] and [redacted] (filed May 13, 2026), and is therefore not re-transmitted with this letter.

Copies served, by electronic mail (the undersigned being forcedly indigent and without means to mail paper copies), upon: [redacted]; the Office of the Attorney General (J. David Hampton, david.hampton@mass.gov; Katherine B. Dirks, katherine.dirks@mass.gov; Joseph P. Lucia, joseph.lucia@mass.gov); the Department of Revenue / Child Support Enforcement ([redacted]; and the United States Attorney for the District of Massachusetts, Civil Rights (USAMA.CivilRights@usdoj.gov).

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# Shared Exhibits To The Parallel Motions To Correct The Record

ON 4 VOLUMES AND 389 PAGES