

IN THE  
Supreme Court of the United States

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*In re:*

MARCUS MARKO BACHMAYER (M.M.B.),

*Petitioner.*

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On Petition for Writ of Habeas Corpus to the State of Minnesota Court of  
Appeals

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MOTION FOR LEAVE TO EXCEED WORD LIMIT

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To the Honorable Brett M. Kavanaugh, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Eighth Circuit:

Pursuant to Rule 33.1(d) of the Rules of this Court, Kyle Dalke Bachmayer ("Father"), on behalf of M.M.B., respectfully seeks leave to dispense with the requirement of a word and page limit in this case.

"For good cause, the Court or a Justice may grant leave to file a document in excess of the word limits, but application for such leave is not favored." U.S. Sup. Ct. R. 33.1.(d). A petition for habeas corpus pursuant to U.S. Sup. Ct. R. 20.2 requires that "[a]ll contentions in support of the petition shall be included in the petition," and is limited to 9,000 words and 40 pages. U.S. Sup. Ct. R. 33.

The questions presented are important questions of law. The question that brings petition for writ of habeas corpus is that the district court was incompetent in making its order imprisoning the petitioner and its subsequent orders continuing and increasing its illegal imprisonment of the petitioner "in violation of the Constitution [and] laws ... of the United States." 28 U.S.C. § 2241(c). The petition challenges the constitutionality of the 1995 alterations to the Writ of Habeas Corpus under Anti-terrorism and Effective Death Penalty Act; the constitutionality of the Clearly Erroneous Standard of Review; the applicability of the Bill of Rights; and the need for a Best Interests of the Child Standard of Review. This case involves abuse of process, waste of public

resources, fraud on the administration of justice, and throughout of domestic abuse.

28 U.S.C. § 2403(a) applies.

The contentions of the petition are, broadly, that M.M.B.'s imprisonment is a result of fraud upon the court perpetrated continuously since the case's inception on June 13, 2018. If there were no word-count limitation, every contention supporting the petition could not be made. The totality of fraudulent nature of the defrauding party's case has been exercised with complete success. Multiple actors have engaged in said fraud of this case. The proceedings in which said fraud has been perpetrated differed in nature, resulting in frauds tailored to the different contexts to which applied.

If the petition is constrained to 9,000 words, the facts of the case cannot be adequately presented or argued.

That Father has autism spectrum disorder should be considered as supporting a grant of this request to suspend the word-count limitation in conjunction with his status as a pro se litigant and the complexity of the fraud involved.

Suspension of the word-count and page limitations will assure that the Father is able to fully present the M.M.B.'s case.

Wherefore, the petitioner respectfully requests that an order be entered granting leave to dispense with the requirement of a word and page limit in this case.

/s/ Kyle Dalke Bachmayer

KYLE DALKE BACHMAYER

*for Petitioner*

March 26, 2023