

Dr. Orly Taitz, ESQ

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Dr. ORLY TAITZ, ESQ, PRO SE

Plaintiff,

v.

Michael Astrue, Commissioner of the

Social Security Administration,

Respondent

§ Case 11-cv-402

§ Hon Judge Lamberth

§ Chief Judge Presiding

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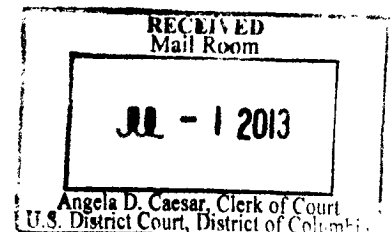
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**NOTICE OF DEFAULT/FAILURE TO ANSWER TO MOTION FOR
RECONSIDERATION
REQUEST FOR THE COURT TO CONSIDER LACK OF AN
OPPOSITION AS A CONSENT BY THE DEFENSE TO GRANT THE
MOTION FOR RECONSIDERATION BY THE PLAINTIFF.**

ARGUMENT

1. On 06.13.2013 Defendant and his attorneys were served with the motion for reconsideration at hand. They were served both by mail and through the ECF.

2. Defense did not oppose the motion.

3. Plaintiff, Orly Taitz, ESQ requests this court to grant her motion for reconsideration and order SSA, Social Security Administration, to furnish to the plaintiff SS-5, Social Security application for SSN xxx-xx-4425, for Harrison (Harry) J. Bounel, born in 1890 under the 5USC 552 Freedom of Information Act FOIA and 120 year rule of the Social Security Administration, whereby the Social Security Administration is required to produce under 5USC552 and “120 year rule” Social Security Applications SS-5 of “extremely aged individuals” of 120 year old or older without their consent or without proof of death. As Bounel was born in 1890, he would be 123 years old if he would be alive today and his SS-5 has to be released as an SS-5 of an “extremely aged individual”.

**REQUEST FOR SANCTIONS AGAINST THE DEFENDANT AND HIS
ATTORNEYS.**

1. Not only the SS-5 of Bounel should be released, there has to be an award of sanctions against the defendant and his attorneys.
2. Plaintiffs brought this case in 2010.
3. Unbeknown to Taitz the SSA already had “120 year”, it implemented it, however the public was not made aware of the rule until 2011. Under 120

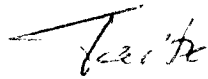
year rule, the SS-5 of “Extremely aged individuals” of 120 or older had to be released without consent of the individual or proof of death.

4. While Taitz did not have this information until recently, the defendant had at all times information showing that Harrison J Bounel, born in 1890 was the holder of SSN xxx-xx-4425 and that the defendant was obligated to release this SSN under 5USC552 and “120 year rule”.
5. Defendant and his attorney, “Department of Justice” engaged in egregious behavior and showed malice by refusing to provide the SS-5 in question and claiming privacy, even though they knew at all times that privacy did not apply. They defrauded Judge Lamberth and the US Court of Appeals for the District of Columbia Circuit claiming defense of privacy even though they knew that privacy did not apply.
6. Plaintiff, who is an attorney from the state of California, filed this case, as she was seeking to uphold constitutional freedoms, as a president for a not for profit Defend Our Freedoms foundation. She spent three years working on this case. She was also subjected to harassment and defamation as defense claimed that her actions were frivolous.
7. Not only interests of Justice would justify granting her motion for reconsideration under the Rule 60B(2),(6), but interests of Justice would justify sanctions against the defense for the reasonable value of time Taitz wasted in court for the past three years and abuse and defamation she was subjected to due to frivolous actions by the defense.

CONCLUSION

1. 60(B)(2)(6) motion for reconsideration should be granted.
2. Plaintiff should be compensated for the reasonable value of time she spent litigating this case for the past three years and for the abuse and defamation she underwent due to actions of the defense.

3. Any and all other relief this court considers reasonable and just.



/s/ Orly Taitz

06.28.2013

CERTIFICATE OF SERVICE

I, Lila Dubert, am over 18 years old, I have personal knowledge of foregoing and I attest under the penalty of perjury that I served the defense with attached pleadings on 06.28.2013 through his attorney

U.S. Attorney

555 Fourth Street, NW

Washington, DC 20530

/s/ Lila Dubert

