

March 12, 2025

Michael Williams  
PRO SE

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

**History Associates Incorporated;**

Plaintiff;

And

**Michael Williams;**

Plaintiff-Intervenor;

v.

**Federal Deposit Insurance Corporation;**

Defendant.

Case No. 1:24-cv-1857-ACR

**PLAINTIFF-INTERVENOR’S:**

**(1) NOTICE OF SPECIAL/LIMITED  
APPEARANCE**

**(2) CERTIFICATE OF SERVICE**

**NOTICE OF SPECIAL/LIMITED APPEARANCE**

TO THE HONORABLE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

**1. Appearance for Limited Purpose**

Pursuant to the Court’s Minute Order dated March 12, 2025 (Dkt. 45), Michael Williams (“Mr. Williams”), proceeding pro se, hereby enters this Special/Limited Appearance in the above-captioned matter. Mr. Williams appears solely to address and challenge:

- The Court’s authority to enter Orders (Dkts. 29 and 30) against Mr. Williams;
- Whether the Court has personal jurisdiction over Mr. Williams;
- The sufficiency of process and/or service of process;
- Venue; and

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- Any other threshold or substantive issues that may affect the Court's jurisdiction or Mr. Williams's constitutional, statutory, or procedural rights.

## **2. Scope of Intervention**

On March 12, 2025, the Court granted Mr. Williams's Motion to Intervene on a limited basis, explicitly permitting Mr. Williams to challenge the Orders at Dkts. 29 and 30 (including jurisdictional and substantive grounds). (See Minute Order, Dkt. 45.) This Notice of Special/Limited Appearance is therefore made in accordance with the Court's directives and shall not be construed as a general appearance or a waiver of any defenses.

## **3. Reservation of All Rights and Defenses**

By filing this Notice, Mr. Williams expressly reserves:

- All defenses under Federal Rule of Civil Procedure 12, 59, and 60, including but not limited to lack of personal jurisdiction, improper service, insufficient process, and improper venue;
- All rights and objections concerning the substance and constitutionality of any orders, including ex parte orders that purport to bind Mr. Williams; and
- Any arguments under statutory, constitutional, or common law, including due process and First Amendment defenses.

## **4. No Waiver or General Appearance**

This Notice of Special/Limited Appearance does not concede that this Court has personal jurisdiction over Mr. Williams or that the service of process was valid. Nor does Mr. Williams waive his right to challenge the Court's exercise of jurisdiction, venue, or any other substantive or procedural matter.

## **5. Further Filings**

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1 In accordance with the Minute Order (Dkt. 45), Mr. Williams will file any motions or memoranda  
2 on or before April 14, 2025, or by any other Court-ordered deadline. Mr. Williams reserves the right  
3 to seek additional relief necessary to protect his interests, consistent with the limited scope of his  
4 intervention.  
5

6 **6. Contact Information**

7 All service and correspondence related to these limited proceedings and challenges may be  
8 directed to Mr. Williams through CM/ECF or at the contact details below:  
9

10 **MICHAEL WILLIAMS**  
11 PO Box 1524  
12 Potts Point  
13 Australia  
+17014841337  
Email: mbwmbw1337@gmail.com

14 **7. Conclusion**

15 Mr. Williams respectfully requests that the Court take note of this Special/Limited Appearance and  
16 direct all pertinent filings or notices that concern the Court's orders at Dkts. 29 and 30 or the  
17 threshold issues of jurisdiction, venue, and due process to him at the above contact information. Mr.  
18 Williams further requests any additional relief the Court deems just and proper considering his  
19 limited intervention. Mr. Williams further asks that Her Honor direct the Clerk to update, if  
20 necessary, the docket to reflect Mr. Williams status in the case as a plaintiff-intervenor and no longer  
21 as a non-party respondent.  
22  
23  
24

25 Dated: March 12, 2025

Respectfully submitted,

26 /s/ Michael Williams

27 Michael Williams  
28 PRO SE

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 12, 2025, a true and correct copy of the foregoing Mr. Williams's Motion to Intervene was served, via CM/ECF, upon the following Counsel for Plaintiff History Associates Inc.:

- Eugene Scalia of GIBSON, DUNN & CRUTCHER, LLP at <escalia@gibsondunn.com>
- Denis Nicholas Harper of GIBSON, DUNN & CRUTCHER, LLP at <nharper@gibsondunn.com>
- Jonathan Charles Bond of GIBSON, DUNN & CRUTCHER, LLP at <jbond@gibsondunn.com>

I further certify that the same day, via CM/ECF, I served a copy upon Counsel for the Defendant, Federal Deposit Insurance Corporation:

- Andrew Jared Dober of Federal Deposit Insurance Corporation at <adober@fdic.gov>
- Lina Soni of Federal Deposit Insurance Corporation at <lsoni@fdic.gov>

Dated: March 12, 2025

Respectfully submitted,

/s/ Michael Williams

Michael Williams  
PRO SE