

1 Mark Joseph NejmeH
2 P.O. Box 589
3 Clifton, New Jersey 07012
4 Telephone: 732-995-3914
5 Email: research@warrantwire.com
6 Plaintiff, self-represented
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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
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11 MARK JOSEPH NEJMEH,
12 Plaintiff,
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14 v.
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16 THERIVA BIOLOGICS, INC.,
17 Defendant.
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Case No. 3:26-cv-00705

PLAINTIFF'S MOTION FOR
EXEMPTION FROM PACER
ELECTRONIC PUBLIC ACCESS
FEES IN THIS CASE, AND FOR
AUTHORIZATION TO SHARE THE
CASE RECORD WITH THE PUBLIC

20 Plaintiff Mark Joseph NejmeH, self-represented, respectfully moves for an order
21 exempting him from the Public Access to Court Electronic Records (PACER) user fees for
22 this case, under the "Discretionary Fee Exemptions" provisions of the Electronic Public
23 Access Fee Schedule issued by the Judicial Conference of the United States under 28
24 U.S.C. § 1913 note, and for express authorization to share the documents obtained under
25 the exemption with the public, free of charge.

26 **1. The standard.** The Fee Schedule provides that courts may exempt certain
27 persons from the user access fee, and that in granting an exemption a court must find that
28 the person seeking it has demonstrated that an exemption "is necessary in order to avoid
29 unreasonable burdens and to promote public access to information." The Fee Schedule
30 names indigents among those a court may consider exempting, and the PACER Service
31 Center states that a court determines on a case-by-case basis whether unrepresented (pro se)
32 litigants may be exempt.

33 **2. The record is large and growing.** Plaintiff's filings to date total approximately
34 719 pages. On September 29, 2026, Defendant filed its opposition to the Emergency
35 Motion (ECF No. 15), with a declaration and nineteen exhibits, which Plaintiff was able to
36 obtain only by paying PACER fees on October 1, 2026; Plaintiff's reply is due October 6,

1 2026. Plaintiff expects the record to grow by thousands of pages as Defendant responds and
2 as the case proceeds. A self-represented party must read the full record, including
3 Defendant's filings and the Court's orders, often more than once.

4 **3. The free access available does not cover that need.** As a party, Plaintiff receives
5 one free electronic copy of each document through the Notice of Electronic Filing. Under
6 the Court's own instructions, that "free look" expires after the first viewing or after 15 days,
7 whichever occurs first. Every later look at a document, every view of the docket sheet, and
8 every search is billed at \$0.10 per page (documents are capped at \$3.00 each; searches and
9 reports carry no maximum). The quarterly waiver applies only to charges of \$30.00 or less.

10 **4. The fees are an unreasonable burden for Plaintiff.** Plaintiff's only regular
11 income is Social Security of about \$2,200 per month, with occasional help from family and
12 friends. He has no fixed residence and lives in his truck; his mailing address is a post office
13 box. He paid the \$405 filing fee in this case by credit card. After his basic monthly
14 expenses of about \$2,170, about \$30 a month remains. Plaintiff cannot pay PACER fees on
15 a record of this size. His financial information is set out in the attached Declaration.

16 **5. The exemption would promote public access to information.** Plaintiff
17 maintains a public website, nejmehvstheriva.com, on which he posts the filings in this case
18 exactly as submitted, free of charge, with a notice that the Court's record on PACER
19 controls. Plaintiff does not sell court records and will not sell any data obtained under an
20 exemption.

21 **6. The request is limited.** Plaintiff asks that the exemption be limited to this case,
22 No. 3:26-cv-00705, including its docket and the documents filed in it; that it run until final
23 judgment and the conclusion of any appeal, or for such other definite period as the Court
24 sets; and that it be revocable at the Court's discretion, as the Fee Schedule provides.

25 **7. Authorization to share the record.** The Fee Schedule provides that a user
26 receiving an exemption must not transfer any data obtained as the result of the exemption
27 "unless expressly authorized by the court." Because the purpose of this request is public
28 access, Plaintiff asks the Court expressly to authorize him to post documents from this case
29 obtained under the exemption on nejmehvstheriva.com and to provide copies, free of
30 charge, to members of the public and the press. Plaintiff agrees not to sell any data obtained
31 under the exemption. If the Court declines to grant this authorization, Plaintiff asks in the
32 alternative for the exemption alone, and agrees not to transfer data obtained under it.

33 **8. Request for prompt ruling.** Plaintiff respectfully asks the Court to rule on this
34 motion as soon as possible. The Court has found that Plaintiff's Emergency Motion (ECF
35 No. 2) warrants expedited consideration (ECF No. 8), and Defendant's response and the
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1 Court's orders may be filed at any time. Plaintiff needs immediate access to keep up with
2 the case as filings are made.

3 **9. Relief requested.** Plaintiff respectfully asks the Court to order that: (a) Plaintiff is
4 exempt from PACER electronic public access fees for Case No. 3:26-cv-00705 until final
5 judgment and the conclusion of any appeal, or for such other period as the Court sets; (b)
6 Plaintiff is expressly authorized to post documents from this case obtained under the
7 exemption on nejmehevstheriva.com and to provide them free of charge to the public and the
8 press; (c) Plaintiff shall not sell any data obtained under the exemption; and (d) the Clerk
9 shall notify the PACER Service Center of the exemption.

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11 Dated: 10/1/2026

12 Respectfully submitted,

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16 Mark Joseph Nejme, Plaintiff, self-represented
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Nejmeh v. Theriva Biologics, Inc., Case No. 3:26-cv-00705

**DECLARATION OF MARK JOSEPH NEJMEH IN SUPPORT OF MOTION FOR
EXEMPTION FROM PACER FEES**

I, Mark Joseph Nejme, declare:

1. I am the Plaintiff in this case and represent myself. I make this declaration from personal knowledge.

2. My only regular income is Social Security, about \$2,200 per month. Family and friends occasionally help me.

3. I have no fixed residence. About two years ago, as the value of my Theriva shares fell, I gave up my apartment in Florida, and I have lived in my truck since. My mailing address is P.O. Box 589, Clifton, New Jersey 07012.

4. I paid the \$405 filing fee in this case by credit card.

5. My monthly expenses are about \$2,170: gas about \$350, food about \$1,500, a \$200 payment to the IRS, and my phone about \$120. That leaves about \$30 a month.

6. My cash and bank balances total about \$600. My credit card balance is about \$3,800.

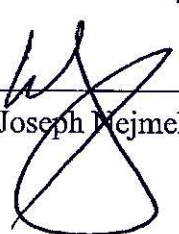
7. I still own my Theriva shares. Their market value today is about \$18,750, roughly \$700,000 less than I paid for them. I have not sold them; I am the stockholder plaintiff in this case.

8. The record in this case is already about 719 pages and will grow by thousands of pages. On my income I cannot pay PACER fees to read and re-read it.

9. I will not sell any data obtained under an exemption.

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

Executed on Oct 1 2026 at Skokie Public Library Illinois


Mark Joseph Nejme

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARK JOSEPH NEJMEH,
Plaintiff,

v.

THERIVA BIOLOGICS, INC.,
Defendant.

Case No. 3:26-cv-00705

**[PROPOSED] ORDER GRANTING
EXEMPTION FROM PACER
ELECTRONIC PUBLIC ACCESS
FEES**

Before the Court is Plaintiff's Motion for Exemption from PACER Electronic Public Access Fees in This Case, and for Authorization to Share the Case Record with the Public. The Court finds that Plaintiff has demonstrated that an exemption is necessary in order to avoid unreasonable burdens and to promote public access to information.

IT IS ORDERED that the motion is GRANTED.

IT IS FURTHER ORDERED that Plaintiff Mark Joseph NejmeH is exempt from the payment of PACER electronic public access fees for Case No. 3:26-cv-00705 until _____ . The exemption is limited to this case and may be revoked at the Court's discretion.

IT IS FURTHER ORDERED that Plaintiff is authorized to post documents from this case obtained under this exemption on nejmeHvstheriva.com and to provide them free of charge to the public and the press. Plaintiff shall not sell any data obtained under this exemption.

IT IS FURTHER ORDERED that the Clerk shall forward a copy of this Order to the PACER Service Center.

DATED: _____

UNITED STATES DISTRICT JUDGE / MAGISTRATE JUDGE

1 Mark Joseph Nejme
2 P.O. Box 589
3 Clifton, New Jersey 07012
4 Telephone: 732-995-3914
5 Email: research@warrantwire.com
6 Plaintiff, self-represented

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 **MARK JOSEPH NEJMEH,**
12 Plaintiff,

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14 v.

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16 **THERIVA BIOLOGICS, INC.,**
17 Defendant.
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Case No. 3:26-cv-00705

**PLAINTIFF'S MOTION FOR PRO
SE LITIGANT TO FILE
ELECTRONICALLY
(LR IC 2-1(b))**

20 Plaintiff Mark Joseph Nejme, self-represented, respectfully moves under Local
21 Rule IC 2-1(b) for authorization to register as an electronic filer in this case.

22 1. Local Rule IC 2-1(b) provides that a pro se litigant may request the Court's
23 authorization to register as a filer in a specific case.

24 2. Plaintiff has no fixed residence and receives mail at a post office box in New
25 Jersey, far from the Court in Reno. Filing on paper requires him to mail or courier each
26 document, which delays filings and adds cost. Electronic filing will let Plaintiff file
27 promptly and serve through the Court's system.

28 3. Plaintiff has internet access and a device capable of preparing and uploading
29 documents in PDF format, and an email address at which he will receive Notices of
30 Electronic Filing: research@warrantwire.com. Plaintiff has registered, or will immediately
31 register, for an individual PACER account.

32 4. Plaintiff has read, and agrees to comply with, the Local Rules of Practice,
33 including Part IC governing electronic filing, and will complete any training or certification
34 the Court requires.

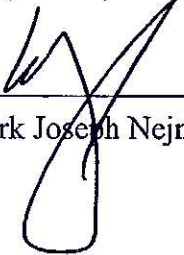
35 5. Plaintiff is filing, with this motion, the Court's Consent for Electronic Service of
36 Documents.

1 **6. Request for prompt ruling.** Plaintiff respectfully asks the Court to rule on this
2 motion as soon as possible. The Court has found that Plaintiff's Emergency Motion (ECF
3 No. 2) warrants expedited consideration (ECF No. 8), and Defendant's response and the
4 Court's orders may be filed at any time. Plaintiff needs immediate access to keep up with
5 the case as filings are made.

6 For these reasons, Plaintiff respectfully asks the Court to authorize him to register as
7 an electronic filer in Case No. 3:26-cv-00705.

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9 Dated: 10/1/2026

10 Respectfully submitted,

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14 Mark Joseph Nejme, Plaintiff, self-represented
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARK JOSEPH NEJMEH,
Plaintiff,

v.

THERIVA BIOLOGICS, INC.,
Defendant.

Case No. 3:26-cv-00705

[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR PRO
SE LITIGANT TO FILE
ELECTRONICALLY

Before the Court is Plaintiff's Motion for Pro Se Litigant to File Electronically under Local Rule IC 2-1(b).

IT IS ORDERED that the motion is GRANTED. Plaintiff Mark Joseph NejmeH is authorized to register as an electronic filer in Case No. 3:26-cv-00705.

IT IS FURTHER ORDERED that Plaintiff shall comply with the Local Rules of Practice governing electronic filing and with any training or certification requirement set by the Clerk.

DATED: _____

UNITED STATES DISTRICT JUDGE / MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CONSENT FOR ELECTRONIC SERVICE OF DOCUMENTS

I, Mark Joseph Nejme, am representing myself and
(Print Full Name)
consent to receive electronic notices of filings and/or delivery of documents by email.

I am providing my email address for the purpose of sending me electronic notice of any Order or other filing in my case with a link to the filed document. I understand that hard (paper) copies of orders will no longer be sent to me by the Court.

I understand that if my email or mailing address changes, it is my responsibility to notify the Court in writing of my new email or mailing address.

I understand that email filters (SPAM filters) may interfere with my receipt of email notifications and I will ensure that my email will not filter out messages from **cmecf@nvd.uscourts.gov**.

I have already registered *or* will immediately register for a PACER account (Public Access to Court Electronic Records).

I understand that consenting to service by email does not authorize me to file my documents electronically. I may request the court's authorization to register as an electronic filer by filing a separate written motion request (LR IC 2-1(b)).

Date: 10/1/2026

Signature 

Email Address (Please print legibly):

research@warrantwire.com

Confirm Email Address:

research@warrantwire.com

Mailing Address:

P.O. Box 589, Clifton, New Jersey 07012

Telephone Number:

732-995-3914

Case Number(s):

3:26-cv-00705-ART-CSD

**INSTRUCTIONS
FOR CONSENT FOR ELECTRONIC SERVICE OF DOCUMENTS**

- 1) Mail this completed Consent form and any changes of mailing and/or email address to the division of the Clerk's Office in which your case was originally filed.

U.S. District Court Clerk
Lloyd D. George U.S. Courthouse
333 Las Vegas Boulevard South, Room #1334
Las Vegas, NV 89101

U.S. District Court Clerk
Bruce R. Thompson U.S. Courthouse
400 S. Virginia Street, Room #301
Reno, NV 89501

- 2) To register for a PACER Account go to <https://pacer.psc.uscourts.gov/pscof/registration.jsf>

Important information regarding PACER usage and electronic notices from the Court:

- A Notice of Electronic Filing (NEF) will be sent to your email address each time something is filed in your case. This notice will contain a document number that is a hyperlink to the document in PACER.
- Pursuant to PACER's policy, you are allowed one "free look" at the document. It is highly recommended that you print or download the document the first time you view the document. After the one "free look", normal PACER fees will apply.
- The one "free look" to the hyperlink will expire after you look at the document the first time or after 15 days, whichever occurs first. Please check your email frequently.
- Additional electronic access to the docket sheet or case documents costs \$0.10 per page.
- PACER has a quarterly billing cycle (every 3 months). If your PACER quarterly usage is \$30.00 or less, your bill will be waived.