

LADCO DEFENSE TECHNOLOGIES (LANIER CAPITAL LLC)

Operational Node Izmail, Ukraine

CAGE Code: 1X2Y8 | UEI: Q7SXLLP6EM51

Email: ladcodefensetechnologies@gmail.com | Telegram: +380957538284

**VIA ELECTRONIC MAIL (efile-vitter@laed.uscourts.gov)
AND U.S. MAIL (COURTESY COPY)**

May 23, 2026

The Honorable Wendy B. Vitter, Chief Judge
United States District Court for the Eastern District of Louisiana
500 Poydras Street, Room C368
New Orleans, LA 70130

Attn:

Marie Firmin, Judicial Assistant
Lanie Bryant, Case Manager
Monty Truett, Law Clerk (*Even-Numbered Cases*)
Richard Bordelon, Law Clerk (*Odd-Numbered Cases*)

RE: *Henri Bryant Lanier Sr., et al. v. Google LLC, d/b/a Google AI Studio, et al.*

Case No.: _____ (*To be assigned by the Clerk of Court*)

Subject: Transmittal of Verified Complaint, Fee Payment, and Notice of Imminent Filing of
Emergency Motion for Temporary Restraining Order / Preliminary Injunction

Dear Chief Judge Vitter:

I write as Plaintiff in my individual capacity and as legal counsel of record for Plaintiff Ladco Defense Technologies (Lanier Capital LLC). Concurrently with this letter, Plaintiffs are submitting a complete filing package, including our *Verified Complaint for Injunctive Relief, Declaratory Judgment, and Damages* against Defendant Google LLC and Does 1–10 in the above-captioned matter, along with the required filing fee payment.

Pursuant to this Court's local guidelines, Chambers instructions, and the Federal Rules of Civil Procedure, the purpose of this letter is to transmit courtesy copies of the Verified Complaint (along with its incorporated **Exhibit A**), confirm the processing of our payment, and respectfully provide chambers with advance notice of an imminent filing for emergency injunctive relief. We kindly request that the Clerk of Court return a conformed, file-stamped copy of the processed filing to us via email at our designated address (ladcodefensetechnologies@gmail.com) for our records and to facilitate immediate service.

LADCO DEFENSE TECHNOLOGIES (LANIER CAPITAL LLC)

Operational Node Izmail, Ukraine

CAGE Code: 1X2Y8 | UEI: Q7SXLLP6EM51

Email: ladcodefensetechnologies@gmail.com | Telegram: +380957538284

I. Overview of the Dispute and Immediate Irreparable Harm

I am an active-duty Master Specialist (E-9) in the United States Army Signal Corps (MOS 31MX), currently stationed at Operational Node Izmail, Ukraine. I have served this Nation continuously on active duty for over 44 years. Due to my extensive service, I am a qualified individual with severe physical disabilities, including arthritic degeneration, neuropathic damage, and fine motor coordination impairments that strictly limit my manual dexterity.

To execute my ongoing military, engineering, and legal commands, I rely on high-fidelity, assistive text-to-speech (TTS) engines as an essential auxiliary aid and reasonable accommodation. My firm maintains a paid, developer-grade commercial subscription to Google AI Studio for this explicit purpose.

On May 23, 2026, I attempted to synthesize a patriotic, historical address entitled the "Sovereign and Unbroken" speech (**Exhibit A**) into audio to distribute to active-duty service members and disabled veterans under my purview. Defendant's automated, unadapted civilian "safety" classifiers blocked the document wholesale due to standard military, historical, and financial terminology (e.g., "war," "fight," "arsenal," "blood"), returning generic, non-descriptive errors that violate Web Content Accessibility Guidelines (WCAG 2.1 AA).

Because Defendant has refused to establish any human-in-the-loop override or military-domain-specific bypass, I am currently locked out of my critical, paid assistive technology pipeline. This has caused—and continues to cause—severe physical strain, operational delays, and a total disruption of vital command-and-control communications in a highly sensitive active theater of operations.

Intentionally Left Blank

LADCO DEFENSE TECHNOLOGIES (LANIER CAPITAL LLC)

Operational Node Izmail, Ukraine

CAGE Code: 1X2Y8 | UEI: Q7SXLLP6EM51

Email: ladcodefensetechnologies@gmail.com | Telegram: +380957538284

II. Notice of Imminent Emergency Motion under FRCP 65(b)

Because of the severe, ongoing nature of this civil rights violation, the physical injuries resulting from manual alternatives, and the critical time-sensitivity of the military communications at issue, **Plaintiffs intend to imminently file an Emergency Motion for a Temporary Restraining Order (TRO) and Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65(b) and Local Rule 65.**

This emergency motion will seek to:

1. Enjoin Defendant Google LLC from applying overbroad, unadapted civilian-oriented automated keyword filters to verified military, defense contractor, and veteran developer accounts; and
2. Order Defendant to immediately restore unimpeded text-to-speech synthesis capabilities for the historic address attached as Exhibit A, or provide a real-time human-reviewed override mechanism.

Intentionally Left Blank

LADCO DEFENSE TECHNOLOGIES (LANIER CAPITAL LLC)

Operational Node Izmail, Ukraine

CAGE Code: 1X2Y8 | UEI: Q7SXLLP6EM51

Email: ladcodefensetechnologies@gmail.com | Telegram: +380957538284

III. Transmittal, Fee Payment, and Request for Return Copy

Concurrently herewith, we are transmitting the complete filing package alongside the applicable filing fee payment. Enclosed with this correspondence, please find digital courtesy copies of:

1. The complete **Verified Complaint for Injunctive Relief, Declaratory Judgment, and Damages**; and
2. **Exhibit A** (The full text of the blocked "Sovereign and Unbroken" address).

We respectfully request that, upon formal entry and receipt of payment, the Clerk of Court email a conformed copy of the docketed filing back to us at ladcodefensetechnologies@gmail.com. Once the Clerk of Court has processed the filing and assigned a Case No., we will immediately notify Ms. Lanie Bryant (Case Manager) and the designated Law Clerk (Mr. Truett or Mr. Bordelon, depending on the assigned case number) so that emergency scheduling can be coordinated.

Intentionally Left Blank

LADCO DEFENSE TECHNOLOGIES (LANIER CAPITAL LLC)

Operational Node Izmail, Ukraine

CAGE Code: 1X2Y8 | UEI: Q7SXLLP6EM51

Email: ladcodefensetechnologies@gmail.com | Telegram: +380957538284

IV. Notice to Opposing Party

Because this filing is made prior to Defendant's formal appearance, a copy of this letter, the Verified Complaint, and Exhibit A are being concurrently transmitted electronically to Google LLC's registered agent for service of process in Delaware (The Corporation Trust Company) and directly to Google's corporate legal department via their established developer communications portal. Plaintiffs will certify formal service of process as soon as the Summons is issued.

Thank you for your time, attention, and consideration of this urgent matter.

Respectfully submitted,

Henri Bryant Lanier Sr. Esq. PhD

By: _____

Henri Bryant Lanier Sr., Esq., Ph.D.

Master Specialist E-9, USASC, 31MX

Ladco Defense Technologies

UEI: Q7SXLLP6EM51 - CAGE: 1X2Y8

Telegram: +380957538284

Email: ladcodefensetechnologies@gmail.com

Web: <https://qh1731mx.wordpress.com/>

Officer of the Court, Commonwealth of Pennsylvania

Attorney for Plaintiffs

CC: Marie Firmin, Judicial Assistant (via efile-vitter@laed.uscourts.gov); Lanie Bryant, Case Manager (via efile-vitter@laed.uscourts.gov); Google LLC (via designated legal and developer counsel portals)

