PORTER | HEDGES

Joshua W. Wolfshohl
Partner
(713) 226-6695 Phone
(713) 226-6295 Fax
jwolfshohl@porterhedges.com

Porter Hedges LLP
1000 Main Street, 36th Floor
Houston, Texas 77002-6341
(713) 226-6000 Main
porterhedges.com

September 29, 2026

Robert Wyn Young
Law Office of R. Wyn Young, Esq.
1421 Lexington Avenue, #180
Mansfield, OH 44907
rwyoung25@gmail.com

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
VIA EMAIL

Re: ***In re Alexander E. Jones*, Bankr. S.D. Tex. Case No. 22-33553 (CML); *Robert W. Young v. Christopher R. Murray, United States Chapter 7 Trustee*, Richland County Court of Common Pleas, Ohio, Case No. 2026 CV 0685 — Violation of the *Barton* Doctrine and Demand for Voluntary Dismissal**

Dear Attorney Young:

We represent Christopher R. Murray, in his capacity as Chapter 7 Trustee (the "***Trustee***") of the bankruptcy estate of Alexander E. Jones, in *In re Alexander E. Jones*, Bankr. S.D. Tex. Case No. 22-33553 (the "***Bankruptcy Case***"). We write regarding the miscellaneous action you filed on or about September 11, 2026, in the Richland County Court of Common Pleas, Ohio, styled *In re Robert W. Young*, Case No. 2026 CV 0685 R (the "***Miscellaneous Action***"), captioned as a "Miscellaneous Action to Make Mandatory Report, Pursuant to 18 U.S.C. § 2382, of Treason Against the United States."

As set forth in detail below, the Miscellaneous Action was filed in violation of the *Barton* doctrine, is barred as a matter of law, and must be dismissed immediately. Your allegations against the Trustee, parties in the Bankruptcy Case, and members of the federal judiciary are false and defamatory. **The Trustee hereby demands that you voluntarily dismiss the Miscellaneous Action, Case No. 2026 CV 0685, pending in the Richland County Court of Common Pleas, within seven (7) days of the date of this letter.** The Trustee reserves all rights.

I. The *Barton* Doctrine Bars the Miscellaneous Action

Before any suit may be commenced against a bankruptcy trustee for acts taken in the trustee's official capacity, the plaintiff must first obtain leave of the bankruptcy court that appointed the trustee. *See Barton v. Barbour*, 104 U.S. 126, 127 (1881); *Anderson v. United States*, 520 F.2d 1027, 1029 (5th Cir. 1975). This doctrine has been consistently applied and reaffirmed by the Fifth Circuit and courts nationwide. *See, e.g., Villegas v. Schmidt*, 788 F.3d 156 (5th Cir. 2015); *Carroll v. Abide*, 788 F.3d 502 (5th Cir. 2015).

You did not seek or obtain leave of the United States Bankruptcy Court for the Southern District of Texas before filing the Miscellaneous Action against the Trustee. Accordingly, the

Richland County Court of Common Pleas lacks jurisdiction over the Miscellaneous Action, and it is void *ab initio*.

II. The Miscellaneous Action Retreads Issues Already Adjudicated

Beyond the jurisdictional bar imposed by the *Barton* doctrine, the substance of your Miscellaneous Action raises the same allegations and issues that have already been adjudicated against you by both the United States Bankruptcy Court for the Southern District of Texas and the United States District Court for the Southern District of Texas.

On March 19, 2025, you filed a Motion for Leave to Intervene in the Bankruptcy Case (ECF No. 1120), seeking to present evidence of the alleged fraudulent nature of the Connecticut state court judgment against Mr. Jones. On April 22, 2025, the Honorable Christopher Lopez denied your motion, finding that you had no identifiable economic interest in the case, that your asserted interests were adequately represented by existing parties, and that your intervention would cause undue delay. The Bankruptcy Court expressly stated that it "carefully considered Young's motion and reviewed the exhibits" and declined to permit intervention or order any party to submit reports about the exhibits. *See* ECF No. 1129 at 2.

You then appealed that ruling to the United States District Court for the Southern District of Texas. On August 19, 2025, Judge Lee H. Rosenthal issued a Memorandum and Opinion affirming the Bankruptcy Court's denial of your motion to intervene, finding that the Bankruptcy Court was "well within its discretion" to deny intervention and that your self-proclaimed interest in protecting the First Amendment and the judicial process "does not give [you] a practical stake in the bankruptcy proceeding." *See* Civil Action No. H-25-2025, ECF No. 14 at 2. Judge Rosenthal further found that your evidence had been reviewed and that "[t]he Bankruptcy Court and the U.S. Trustee are fully able, and are in a much better position than Mr. Young, to detect any fraud, to protect the integrity of the bankruptcy process, and to ensure that the Constitution is followed". *Id.* at 3. Your appeal was dismissed. *See* Civil Action No. H-25-2025, ECF No. 15.

Additionally, on June 5, 2025, the Bankruptcy Court denied your Request for Certification of Direct Appeal and your Motion to Stay Pending Appeal, and the District Court likewise denied your request for certification to the Fifth Circuit.

Your Miscellaneous Action is nothing more than an impermissible attempt to relitigate these same issues in a state court forum—one that lacks jurisdiction to hear such claims—after both the Bankruptcy Court and the District Court have considered and rejected them. The filing of the Miscellaneous Action diverts time and estate resources, risks producing rulings inconsistent with those of the federal courts, and interferes with the orderly administration of the Bankruptcy Case.

III. Consequences of Failure to Comply

Should you fail to voluntarily dismiss the Miscellaneous Action within the seven-day period specified above, we will promptly seek relief from the United States Bankruptcy Court for the Southern District of Texas, including but not limited to the following:

- A permanent injunction prohibiting you from pursuing the Miscellaneous Action or any similar suit against the Trustee in any forum without first obtaining leave of the Bankruptcy Court, pursuant to 11 U.S.C. § 105(a);
- Sanctions for your willful violation of the *Barton* doctrine; and
- An award of attorneys' fees and costs incurred in connection with addressing and obtaining dismissal of the Miscellaneous Action.

We note that courts have not hesitated to impose such relief — including permanent injunctions against pro se litigants — to enforce the *Barton* doctrine. *See In re Amborn v. Szanto (In re Szanto)*, 671 B.R. 69, 75 (Bankr. D. Or. 2025); *Hindu Temple & Cmty. Ctr. Of Ga.*, 502 B.R. 881 (Bankr. N.D. Ga. 2013); and *In re Minh Vu Hoang*, 2014 Bankr. LEXIS 3490, at *11 (Bankr. D. Md. Aug. 15, 2014).

Please provide us with notice that the Miscellaneous Action has been dismissed.

Sincerely,

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl
Partner