

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

PRM GROUP, INC., *
Plaintiff, *
v. * Civil No. TJS-25-1077
PARALEGAL BOOTCAMP LLC *et al.*, *
Defendants. *

* * * * *

SHOW CAUSE ORDER

This is an Order for Defendants to show cause why the Court should not impose sanctions under Rule 11 and the Court’s inherent authority for their misconduct in this case.

On August 14, 2025, Defendants Timothy Raju Mahajan (“Mr. Mahajan”) and Paralegal Bootcamp LLC¹ filed a Motion to Dismiss (ECF No. 32) that contained multiple fictitious case citations and misrepresentations of law. *See* ECF No. 35 at 8-15, 18-19, 21-22, 25-26.

On August 26, 2025, counsel for Plaintiff PRM Group, Inc. emailed Mr. Mahajan to notify him that counsel had been unable to locate nine cases cited in the Motion to Dismiss. ECF No. 35-2 at 2. Plaintiff’s counsel requested that Mr. Mahajan provide a copy of the cases or the corrected citations promptly. *Id.* Mr. Mahajan responded the next day. ECF No. 35-3 at 2. Mr. Mahajan confirmed that “all of the cases cited in Defendants’ Motion to Dismiss are accurate,” and listed the full citation for each case. *Id.*

¹ Mr. Mahajan, an attorney, is representing himself and Paralegal Bootcamp LLC.

On August 28, 2025, the day when Plaintiff's response to the Motion to Dismiss was due, Defendants filed a "Motion for Leave to File Amended Motion to Dismiss" (ECF No. 33).² In this motion, Defendants stated that after filing the motion to dismiss,

[and] in further preparing for this litigation, Defendants identified opportunities to refine and strengthen the arguments presented in the initial motion. The proposed Amended Motion to Dismiss (a clean copy of which is attached as Exhibit A) provides a more precise and thorough legal analysis, incorporates additional supporting case law, and enhances the factual presentation for the Court's benefit. A redline comparison illustrating the specific amendments between the motion at ECF No. 32 and the proposed Amended Motion is attached as Exhibit B. It does not assert new causes of action or defenses but amplifies the existing ones.

ECF No. 33. Defendants did not disclose that the Motion to Dismiss contained numerous fictitious case citations.

The Court denied the motion for leave to amend the same day, explaining:

The Court does not find good cause to allow Defendants to modify their Motion to Dismiss for the purposes stated in Defendants' [33] Motion (that is, to provide "a more precise and thorough legal analysis, incorporate[] additional supporting case law, and enhance[] the factual presentation for the Court's benefit"). Defendants may address all of these matters in their reply in support of the Motion to Dismiss.

ECF No. 34.

Thereafter, Plaintiff filed its response to the Motion to Dismiss. In the response, Plaintiff pointed out numerous case citation errors and misrepresentations of legal authority in Defendants' Motion. ECF No. 35 at 8-15, 18-19, 21-22, 25-26. In Defendants' reply, they acknowledged that the Motion to Dismiss "contained several incorrect case citations that [Defendants] were unable to verify through standard legal databases." ECF No. 39 at 4. They explained their efforts to correct the mistake and stated that their "goal was not to obscure the error but to correct it with integrity

² Before filing the Motion for Leave to Amend, Mr. Mahajan improperly called my chambers *ex parte* to ask for advice on filing an amended motion to correct citation errors. My chambers advised him to file his request in writing.

and return the focus to the powerful, substantive legal arguments for dismissal that remain entirely valid and supported by ample, verifiable law.” ECF No. 39 at 5. They accused Plaintiff’s counsel of “weaponiz[ing] [the] good-faith corrective process” by dedicating “significant resources to cataloging [Plaintiff’s] initial citation errors.” *Id.* at 5.

Defendants shall show cause, by **December 30, 2025**, why their conduct does not violate Fed. R. Civ. P. 11(b) and why the Court should not impose sanctions under Fed. R. Civ. P. 11(c) and by the inherent power of the Court (including, but not limited to, disqualification of Defendants’ counsel, entry of default judgment, preclusion of certain defenses, imposition of a fine and attorney’s fees, and referral to licensing authorities) for Defendants’ (1) citation of fictitious legal authority in the Motion to Dismiss, (2) mischaracterization of valid legal authority in the Motion to Dismiss, and (3) attempt to mislead the Court as to the reason that Defendants wished to amend their Motion to Dismiss, *see* ECF No. 33. Defendants’ answer to this Order shall be filed on CM/ECF.

Plaintiff may file a memorandum regarding Defendants’ response within 14 days after it is filed. Absent further order of Court, no other filings regarding this Show Cause Order will be accepted.

Date: December 16, 2025

/s/
Timothy J. Sullivan
Chief United States Magistrate Judge