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6 REPRESENTING DEFENDANTS
JAMIE RODRIGUEZ, WASHOE
7 COUNTY REGISTRAR OF VOTERS,
ERIC BROWN, ALEXIS HILL,
8 and WASHOE COUNTY

9 **FIRST JUDICIAL DISTRICT COURT OF NEVADA**
10 **CARSON CITY**

11 * * *

12 ROBERT BEADLES, an individual,

13 Plaintiff,

Case No. 23-OC-00105-1B

14 vs.

Dept No. D1

15 JAMIE RODRIGUEZ, in her official
capacity as Registrar of Voters and in her
16 personal capacity; the WASHOE COUNTY
REGISTRAR OF VOTERS, a government /
17 agency; ERIC BROWN in his official
capacity as WASHOE COUNTY
18 MANAGER and in his personal capacity,
ALEXIS HILL in her official capacity as
19 CHAIRWOMAN OF WASHOE
COUNTY BOARD OF
20 COMMISSIONERS and in her personal
capacity; WASHOE COUNTY, a political
21 subdivision of the State of Nevada, and
DOES I-X; and ROE CORPORATIONS I-
22 X.

23 Defendants.

24 **DEFENDANTS' MOTION TO ENLARGE PAGE LIMITS FOR REPLY IN**
25 **SUPPORT OF MOTION FOR SANCTIONS**
26

1 Pursuant to FJDCR Rule 3.23(c), Defendants Jamie Rodriguez (“Ms. Rodriguez”),
2 the Office of the Washoe County Registrar of Voters (“ROV”), Washoe County Manager
3 Eric Brown (“Manager Brown”), Washoe County Commissioner Alexis Hill
4 (“Commissioner Hill”), and Washoe County, by and through counsel, DDA Lindsay
5 Liddell, hereby submit their Motion to Enlarge Page Limits regarding their Reply in
6 Support of Motion for Sanctions.

7 The Motion for Sanctions was filed in the Second Judicial District Court, which has
8 no page limits. Plaintiff Robert Beadles filed an Opposition to the Motion for Sanctions
9 with 49 pages, excluding exhibits. The instant Motion was concurrently filed with
10 Defendants’ Reply in Support of Motion for Sanctions. A proposed order is attached
11 hereto as “Exhibit 1.”

12 **DECLARATION OF DDA LINDSAY L. LIDDELL**

13 I, LINDSAY L. LIDDELL, declare under penalty of perjury as follows:

14 1. I am an attorney representing Commissioner Hill, Manager Brown, Ms.
15 Rodriguez, the ROV, and Washoe County in the above-entitled action. I made this
16 Declaration in support of Defendants’ Motion to Enlarge Page Limits. I have personal
17 knowledge of the facts stated herein and am competent to testify to those facts.

18 2. Concurrent with the filing of the instant motion to enlarge page limits,
19 Defendants submit their Reply in Support of Motion for Sanctions. Defendants seek
20 sanctions against Robert Beadles under NRCP 11 and NRS 18.010 in the form of
21 attorneys’ fees and costs, and a sanction fine paid to the court.

22 3. Good cause exists to extend the 5-page limit for Replies under Rule 3.23(b).
23 Plaintiff Robert Beadles submitted a lengthy Opposition, well beyond this Court’s 10-
24 page limit. Complete briefing all on issues is important and necessary. This case involves
25 baseless claims of election fraud, and a full rebuttal is important to show why this case is
26 a misuse of the judicial system and an inappropriate attempt to undermine confidence in

1 the Washoe County elections system. Additionally, should this matter be appealed,
2 complete briefing will be helpful to the parties.

3 AFFIRMATION PURSUANT TO NRS 239B.030

4 The undersigned does hereby affirm that the preceding document does not contain
5 the social security number of any person.

6 Dated this 28th day of September, 2023.

7
8 By


LINDSAY L. LIDDELL
Deputy District Attorney
One South Sierra Street
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(775) 337-5700

9
10 REPRESENTING DEFENDANTS
11 JAMIE RODRIGUEZ, WASHOE
12 COUNTY REGISTRAR OF VOTERS,
13 ERIC BROWN, ALEXIS HILL,
14 and WASHOE COUNTY
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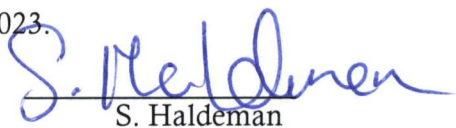
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the Office of the District Attorney of Washoe County, over the age of 21 years and not a party to nor interested in the within action. I certify that on this date, Defendants' Motion to Enlarge Page Limits Reply in Support of Motion for Sanctions was filed with the First Judicial District Court, Carson City. I certify that on this date, based on the parties' agreement pursuant to NRCP 5(b)(2)(E), Plaintiff Robert Beadles was served with a copy of Defendants' Motion To Enlarge Page Limits For Reply In Support Of Motion For Sanctions at the following electronic mail address:

Robert Beadles
beadlesmail@gmail.com

Dated this 28th day September, 2023.


S. Haldeman

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INDEX OF EXHIBITS

Exhibit 1 Proposed Order 3 pages