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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' RESPONSE TO ROBERT BEADLES'S MOTION TO**
REQUEST LEAVE TO FILE LIMITED MOTION FOR RECONSIDERATION
25 **OF CHANGE OF VENUE LOCATION**
26

1 Defendants Jamie Rodriguez, the Office of the Washoe County Registrar of Voters,
2 Washoe County Manager Eric Brown, Washoe County Commissioner Alexis Hill, and
3 Washoe County by and through counsel, DDA Lindsay Liddell, hereby file a limited
4 Response to Plaintiff Robert Beadles's ("Beadles") Motion to Request Leave to File
5 Limited Motion for Reconsideration of Change of Venue Location.

6 Beadles previously filed a Motion for Reconsideration of the Court's Corrected
7 Order Granting Plaintiff's Motion to Change Venue filed September 14, 2023. He filed his
8 Motion for Reconsideration without leave of Court, violating this Court's rules. *See*
9 FJDCR 3.13; DCR 13(7). Now, in the instant Motion for Leave, Beadles seeks leave to file
10 his Motion for Reconsideration. This would provide him an opportunity to argue that the
11 Second Judicial District Court should have transferred this case to Lyon County rather than
12 the First Judicial District Court in Carson City. He again provides no admissible or credible
13 evidence regarding alleged bias in Carson City, and alleged lack of bias in Lyon County.

14 Notwithstanding, pursuant to FJDCR 3.13(b), "[a]n opposition to motion for leave
15 to file a motion for reconsideration will not be filed unless ordered by the court." Therefore,
16 Defendants will file an opposition to the Motion for Leave only if the Court so orders.

17 PURSUANT TO NRS 239B.030

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

20 Dated this 10th day of October 2023.

21 By 
22 LINDSAY L. LIDDELL
23 Deputy District Attorney
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25 Reno, NV 89501
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(775) 337-5700
REPRESENTING DEFENDANTS
JAMIE RODRIGUEZ, WASHOE
COUNTY REGISTRAR OF VOTERS,
ERIC BROWN, ALEXIS HILL,
and WASHOE COUNTY

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCPP 5(b), I certify that I am an employee of the Office of the District
3 Attorney of Washoe County, over the age of 21 years and not a party to nor interested in
4 the within action. I certify that on this date, Defendants' Response To Robert Beadles's
5 Motion To Request Leave To File Limited Motion For Reconsideration Of Change Of
6 Venue Location was filed with the First Judicial District Court, Carson City. I certify that
7 on this date, based on the parties' agreement pursuant to NRCPP 5(b)(2)(E), Plaintiff Robert
8 Beadles was served with a copy of Defendants' Response To Robert Beadles's Motion To
9 Request Leave To File Limited Motion For Reconsideration Of Change Of Venue
10 Location at the following electronic mail address:

11 Robert Beadles
12 beadlesmail@gmail.com

13 Dated this 10th day of October 2023.

14 
15 S. Haldeman