

1 ROBERT BEADLES

2 10580 N. McCarran Blvd. #115, Apt. 386

3 Reno, NV 89503

4 *Plaintiff, Pro Se*

5 **FIRST JUDICIAL DISTRICT COURT OF NEVADA**
6 **CARSON CITY**

7 MR ROBERT BEADLES, an individual,

Case No.: 23oc001051b

8 Plaintiff,

9 vs.

Department: 1

10 JAMIE RODRIGUEZ, in her official capacity
11 as Registrar of Voters and in her personal
12 capacity; the WASHOE COUNTY
13 REGISTRAR OF VOTERS, a government
14 agency; ERIC BROWN in his official capacity

[Oral Argument Requested]

15 as WASHOE COUNTY MANAGER and in his
16 personal capacity, ALEXIS HILL in her official
17 capacity as CHAIRWOMAN OF WASHOE
18 COUNTY BOARD OF COMMISSIONERS
19 and in her personal capacity; WASHOE
20 COUNTY, Nevada a political subdivision of the
21 State of Nevada, and DOES I-X; and ROE
22 CORPORATIONS I-X.

23 Defendants.

24 **MOTION FOR ORAL ARGUMENT ON PLAINTIFF-APPELLANT'S MOTION TO**

25 **STAY ENFORCEMENT OF JUDGMENT PENDING APPEAL**

26 **I. INTRODUCTION**

27 The Plaintiff-Appellant, Robert Beadles, respectfully submits this Motion for Oral Argument
regarding the Court's recent decision to deny the Plaintiff-Appellant's Motion to Stay

Enforcement of Judgment Pending Appeal without an oral hearing. This Motion seeks to

1 illustrate the necessity and importance of oral argument in the fair and just consideration of the
2 Plaintiff-Appellant's request.

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4 The Plaintiff-Appellant, Robert Beadles, respectfully submits this Motion For Oral Arguments in
5 support of the reasons why my MOTION TO STAY ENFORCEMENT OF JUDGMENT
6 PENDING APPEAL should be granted, not denied.

7 8 9 **II. ARGUMENT**

10 11 **A. Importance of Oral Argument in Complex and Significant Matters**

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13 **Nature of the Case:** The complexities and significant financial implications of this case
14 necessitate a thorough and interactive discussion, which can best be achieved through oral
15 argument.

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18 **Clarification of Legal and Factual Issues:** Oral argument provides an invaluable opportunity
19 for the Court to hear my arguments as to why Stay should be granted, and seek clarification on
20 legal and factual matters, thus ensuring a well-informed decision.

21 22 **B. Precedent Supporting Oral Argument**

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25 As seen in *Rives v. Farris Supreme Court of Nevada*. March 31, 2022 138 Nev. 138506 P.3d
26 1064, and *Nalder v. Eighth Judicial District Court in and for County of Clark*

1 *Supreme Court of Nevada. April 30, 2020* 136 Nev. 200462 P.3d 677 oral argument allowed for
2 successful remedies, which the same should be afforded to me as my rights to due process should
3 not be infringed.

4
5 **Nevada Supreme Court Appeal:** Given the ongoing appeal in the Nevada Supreme Court
6 granting this motion to properly argue why a stay on enforcement of the order is in the best
7 interest of all parties, granting this motion is prudent.
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10 **C. Equity and Fairness**

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12 **Equal Treatment Under Law:** The denial of an opportunity for oral argument may be
13 perceived as a denial of the Plaintiff-Appellant's right to fully present my case.
14

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16 **Enhanced Understanding of Plaintiff-Appellant's Position:** Oral argument allows the
17 Plaintiff-Appellant to more effectively communicate the nuances and critical aspects of my
18 argument, which must not have be fully captured in written submissions.
19

20 **Judicial Economy and Fairness:** Additionally, it is pertinent to acknowledge Judge Russell
21 who, in his previous ruling, granted the defense a motion to dismiss with prejudice based on
22 judicial economy. In the spirit of fairness and consistency, extending similar consideration to the
23 Plaintiff-Appellant by arguing why staying the enforcement of the judgment is warranted. This
24 action aligns with the Court's approach to judicial economy, ensuring that both parties are subject
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1 to the same standards and considerations, thereby maintaining the integrity and fairness of the
2 judicial process.

3
4 **IV. CONCLUSION**

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6 In light of the above arguments, the Plaintiff-Appellant respectfully requests that the Court grant
7 this Motion for Oral Argument. The opportunity for oral discussion is not only a cornerstone of a
8 fair judicial process but is also crucial in ensuring a well-reasoned and just decision in a case of
9 this complexity and significance.
10

11 Dated: 1/9/24

12 Submitted,

13
14 By: _____

15 ROBERT BEADLES, Plaintiff Pro Se
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18
19 **AFFIRMATION PURSUANT TO NRS 239B.030**

20 The undersigned does hereby affirm that the preceding document does not contain the Social
21 Security Number of any person.

22 DATED: January 9th, 2024.

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24 Robert Beadles, Plaintiff
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that on January 9th, 2024, I served all parties by electronically emailing the defense counsel and by sending via first-class mail with sufficient postage prepaid to Lindsay Liddell, the respondents' defense attorney.

Haldeman, Suzanne shaldeman@da.washoecounty.gov

Hickman, Elizabeth ehickman@da.washoecounty.gov

Liddell, Lindsay L lliddell@da.washoecounty.gov

And mailed to:

One South Sierra Street Reno, Nevada 89501

Robert Beadles, Plaintiff