

1 ROBERT BEADLES
10580 N. McCarran Blvd. #115, Apt. 386
2 Reno, NV 89503
3 Appellant, In Pro Per

4 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

6 MR ROBERT BEADLES, an individual,
7 Appellant,
8 vs.

NVSC Case No.: 87683
District 1 Case No: 23-OC-00105 1B
District 2 Case No: CV23-01341

9 JAMIE RODRIGUEZ, in her official
10 capacity as Registrar of Voters and in her
11 personal capacity; the WASHOE COUNTY
12 REGISTRAR OF VOTERS, a government
13 agency; ERIC BROWN in his official
14 capacity as WASHOE COUNTY
15 MANAGER and in his personal capacity,
16 ALEXIS HILL in her official capacity as
CHAIRWOMAN OF WASHOE COUNTY
BOARD OF COMMISSIONERS and in her
personal capacity; WASHOE COUNTY,
Nevada a political subdivision of the State
of Nevada, and DOES I-X; and ROE
CORPORATIONS I-X.

17 Respondents.

18 **MOTION TO EXPEDITE RULING**

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21 **I. INTRODUCTION**

22 Pursuant to NRAP Rule 27, Appellant, Robert Beadles, respectfully
23 submits this Motion to Expedite Ruling regarding the appeal from the
24 dismissal with prejudice under Rule 12(b)(5) of the Nevada Rules of Civil
25 Procedure. This motion is crucial due to the imminent nature of the
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1 upcoming election and the significant public interest in resolving the legal
2 issues at hand promptly.
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5 **II. BACKGROUND**

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7 On 12/11/23, I filed my Opening Appellate Brief challenging the lower
8 court's dismissal with prejudice under Rule 12(b)(5). The brief, among
9 other facts and evidence, demonstrated adherence to NRCPC Rule 8(a)(2),
10 effectively contesting the basis for dismissal. As of this date, it has been 33
11 days since the filing of my Opening Appellate Brief. The Respondents are
12 not required to respond to my brief, and there is zero chance of a successful
13 settlement conference; therefore, I ask this honorable court to expedite the
14 ruling in the best interests of all parties and the public.
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19 **III. ARGUMENT**

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21 **Urgency Due to Upcoming Election:** The matters at issue in this case are
22 directly pertinent to the forthcoming election, which is only five months
23 away. The resolution of these issues is imperative to ensure the lawfulness
24 of the electoral process.
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2 **Absence of Respondents' Response:** Given that the Respondents are not
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4 obligated to respond to my brief, per NRAP Rules 31 and 46, and there is
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6 no chance of a successful settlement conference, I urge this Honorable
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8 Court to move forward with its ruling based on my brief, my submitted
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10 pleadings, and all 170 exhibits submitted to this and the lower courts.

11 **Precedent for Expedited Rulings:** The Nevada Supreme Court has the
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13 authority to expedite proceedings in situations of significant public interest
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15 or urgency with elections as shown in *Miller v. Burk*, 124 Nev. 579, 188
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17 P.3d 1112 (Nev. 2008) and in *Election Integrity Project of Nevada, LLC v.*
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19 *Eighth Judicial District Court in and for County of Clark*, 136 Nev. 804,
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21 473 P.3d 1021 (Nev. 2020). Additionally, NRAP Rule 2 shows this
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23 honorable court can expedite its decision or for other good cause.

24 **Need for Swift Resolution:** An expedited ruling is imperative in this case.
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26 Should the Court decide in my favor, immediate relocation of the trial to a
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28 neutral county and the selection of a jury are critical steps, both of which

1 are notably time-consuming. This urgency is compounded by recent
2 developments: Respondent Rodriguez's resignation as ROV and the
3 appointment of a seemingly unqualified successor. Furthermore,
4 unresolved issues raised in my complaint persist. The respondents' media
5 team, as evidenced in Exhibits 168-170, is disseminating misleading
6 information, directly impacting the forthcoming election. Contradictorily,
7 while the District Attorney's Office has indicated the feasibility of
8 implementing Vice Chair Commissioner Herman's election integrity
9 measures, the respondents' media representation erroneously labels these
10 safeguards as potentially illegal. A prompt and favorable ruling would
11 address these multifaceted concerns, ensuring clarity and integrity in the
12 electoral process.
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1 **IV. CONCLUSION**

2 Your Honor, I am aware you have a tremendous caseload, and I apologize
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4 for adding to your workload with my motion and request. However, with
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6 the election just five months away, for any hope of having a lawful election
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8 by then, this case must be allowed to move forward. I believe I have
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10 overcome the NRCP Rule 12(b)(5) dismissal with prejudice, as I have over
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12 100 allegations in which I can be granted remedy by this court, a lower
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14 court, or a jury, thus adhering to NRCP Rule 8(a)(2). My court orders,
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16 Exhibit 72 alone, and the respondents' violations (Exhibits 23-24) should
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18 overturn Judge Russell's ruling.

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20 It is imperative that this case moves forward as swiftly as legally possible
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22 to ensure Washoe has lawful elections and to avoid setting an erroneous
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24 precedent by allowing cases to be dismissed under NRCP Rule 12(b)(5)
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26 when they clearly adhere to NRCP Rule 8(a)(2). I respectfully ask you to
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28 expedite this ruling in the pursuit of justice and the best interests of the
public, ensuring a lawful and fair electoral process.

Respectfully submitted,

By: _____

ROBERT BEADLES, Appellant In Pro Per,

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

Reno, NV 89503 916-573-7133

AFFIRMATION PURSUANT TO NRS 239B.030

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

DATED: January 12th, 2024.

Robert Beadles, Appellant In Pro Per

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that on January 12th, 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, Appellant In Pro Per