

1 ROBERT BEADLES  
2 10580 N. McCarran Blvd. #115, Apt. 386  
3 Reno, NV 89503  
4 *Plaintiff, Pro Se*

5  
6 **FIRST JUDICIAL DISTRICT COURT OF NEVADA**  
7 **CARSON CITY**  
8

MR ROBERT BEADLES, an individual,  
  
Plaintiff,

vs.

JAMIE RODRIGUEZ, in her official capacity as Registrar of Voters and in her personal capacity; the WASHOE COUNTY REGISTRAR OF VOTERS, a government agency; ERIC BROWN in his official capacity as WASHOE COUNTY MANAGER and in his personal capacity, 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.

Defendants.

Case No.: 23oc001051b

DEPT. NO.: 1

9

10 **Motion to Request Leave to File Limited Motion for Reconsideration of Change of Venue**  
11 **Location**

12  
13 **Introduction**

14 The Plaintiff filed a Motion for a Change of Venue in Washoe County District Court 2, presided  
15 over by the Honorable Judge Drakulich. While Judge Drakulich granted the Plaintiff's motion,  
16 the case was relocated to Carson City instead of Lyon County, as initially requested by the  
17 Plaintiff. Washoe County features significant news coverage of the Plaintiff, making a fair trial  
18 there unattainable. Although Carson City's population comprises merely 10% of Washoe



1 County's, a staggering 90% of Washoe's media influence extends into Carson City. This  
2 saturation similarly impedes the Plaintiff's prospects of a fair trial in Carson City. The Plaintiff  
3 respectfully petitions this Honorable Court to authorize the motion to transfer the venue to Lyon  
4 County. It is possible that the Honorable Judge Drakulich was unaware of the extent to which  
5 Washoe's media dominates Carson City. Had this been known, it's doubtful she would have  
6 selected it as the alternative venue. While she cited convenience as the principal reason for her  
7 decision — and indeed, Carson City might be more accessible than Lyon County — it is crucial  
8 to consider the overarching need for impartiality. Lyon County, being reasonably accessible to  
9 all parties yet adequately removed from the extensive media reach of Washoe County, provides a  
10 more promising environment for an unbiased trial. Furthermore, in our technologically advanced  
11 age, a significant portion of court proceedings can be facilitated through platforms like Zoom or  
12 other video-conferencing tools. This capability considerably diminishes the inconvenience for  
13 those traveling from Washoe to Lyon County. Every individual, including the Plaintiff, is  
14 entitled to an unbiased trial, and relocating to Lyon County undoubtedly presents the optimal  
15 path to achieving that fundamental right.

16 **Background**  
17 The Plaintiff has brought forth two causes of action against the defendants. The first cause  
18 alleges violations of various NRS, Voting Laws, and the Nevada Constitution, specifically  
19 concerning our most fundamental right: the right to suffrage. The second cause of action seeks  
20 the removal of Defendants Hill, Brown, and Rodriguez from office under NRS 283.440, citing  
21 malfeasance, nonfeasance, and malpractice.  
22 This case urgently needs to proceed to trial, given the significant volume of evidence and witness  
23 testimonies corroborating the Plaintiff's allegations. The Defense is attempting to divert this



1 Honorable Court's attention with their motions to dismiss and motions for sanctions. Far from  
2 being frivolous or falling under the purview of a 12(b)(5) or Rule 11 violation, this case is solidly  
3 grounded. The Plaintiff has fortified his position with over 156 exhibits and numerous pleadings,  
4 amply surpassing the burden of proof required to counter the Defense's oppositions.

5 Now, the Plaintiff respectfully requests this Honorable Court to transfer the venue to Lyon  
6 County from Carson City. Although the Honorable Judge Drakulich approved the Change of  
7 Venue from Washoe, the case was relocated to Carson City rather than Lyon County, as initially  
8 sought by the Plaintiff. Given the extensive unfavorable media coverage against the Plaintiff in  
9 Carson City and the notable connections the defendants maintain there with prominent  
10 policymakers, judiciary members, and media entities, the likelihood of the Plaintiff receiving an  
11 impartial trial in Carson City is nonexistent at best. The Plaintiff requests this Honorable court to  
12 grant the submission of the Plaintiffs "Limited Motion For Change Of Venue Location".

13 *leave to amend a pleading after the initial responsive pleadings have been served, "leave shall be*

14 **Argument** *"When justice so requires." The Nevada Supreme Court has held that "in the absence*

15 The Plaintiff is uncertain whether leave is necessary to file the limited motion since it doesn't  
16 seek a rehearing but merely requests the court to change the venue to Lyon County. This is due  
17 to new findings that 90% of Washoe County's media, which portrays the plaintiff unfavorably,  
18 reaches Carson City's 58,000 residents, compromising the likelihood of a fair trial there. To err  
19 on the side of caution, this motion for leave is submitted. *prejudice to the opponent or lack of*

20 *good faith by the moving party." There are strong reasons to grant leave to ensure justice and*

21 The court should grant leave, as the media influence from Washoe into Carson City, detailed in  
22 the Plaintiff's "Limited Motion For Reconsideration of Change of Venue Location," significantly  
23 removes the prospects of a fair trial for the plaintiff. Lyon County, while still accessible for all



1 parties, is insulated from Washoe's media influence and lacks the potential conflicts arising from  
2 the defendants' relationships with Carson City officials and courts.

3

4 Importantly, granting this leave or the limited motion for venue reconsideration would not  
5 prejudice the defendants. The Court should consider the merits of the case and the motion.

6 Holding the trial in Lyon County is imperative for fairness, convenience, and the overarching  
7 interests of justice. Media statistics are here below:

8 <https://g.co/bard/share/c8b8c35b9ec2>, <https://g.co/bard/share/731f6d61553a>,

9 <https://g.co/bard/share/dbc6489cc8ef>,

10 <https://g.co/bard/share/033350a54dfe>

11 **Nutton v. Sunset Station, Inc.**, 131 Nev., Advance Opinion 34 (Nev. App. Jun. 11, 2015)

12 states, "We consider each of these grounds seriatim. NRCP 15(a) recites that when a party seeks  
13 leave to amend a pleading after the initial responsive pleadings have been served, "leave shall be  
14 freely given when justice so requires." The Nevada Supreme Court has held that "in the absence  
15 of any apparent or declared reason—such as undue delay, bad faith or dilatory motive on the part  
16 of the movant—the leave sought should be freely given." *Stephens v. S. Nev. Music Co.*, 89  
17 Nev. 104, 105-06, 507 P.2d 138, 139 (1973). Thus, NRCP 15(a) contemplates the liberal  
18 amendment of pleadings, which in colloquial terms means that most such motions ought to be  
19 granted unless a strong reason exists not to do so, such as prejudice to the opponent or lack of  
20 good faith by the moving party." There are strong reasons to grant leave to ensure justice and  
21 uphold the parties' rights to due process. Conversely, there are no strong grounds to deny leave  
22 for the "Limited Motion For Reconsideration of Change of Venue Location" or to refuse the  
23 change of venue to Lyon County.



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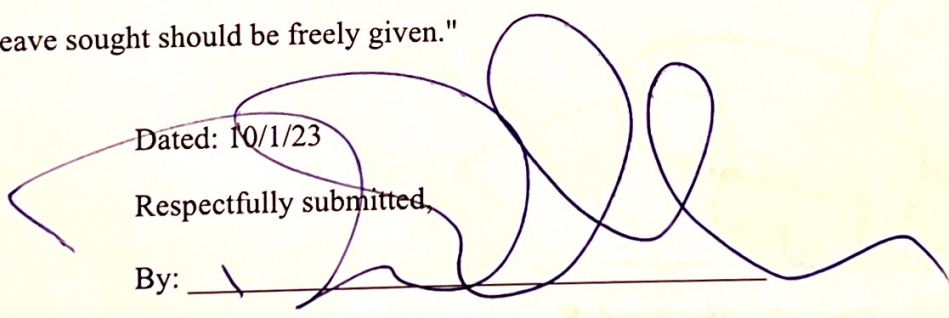
**Conclusion**

Your Honor,

It is in the best interest of all parties to receive an unbiased trial and ensure their rights are upheld. I am appreciative of the Honorable Judge Drakulich for granting his Motion to Change Venue. However, in Carson City, due to media penetration and relationships between defendants and public and court officials, it becomes impossible for me to secure a fair trial. It is the responsibility of this honorable court to ensure my rights are not compromised. I respectfully request this honorable court to grant my leave to file my Limited Motion to reconsider the change of venue location. As the NV Supreme Court stated, "in the absence of any apparent or declared reason—such as undue delay, bad faith or dilatory motive on the part of the movant—the leave sought should be freely given."

Dated: 10/1/23

Respectfully submitted,

By: 

ROBERT BEADLES, Plaintiff Pro Se

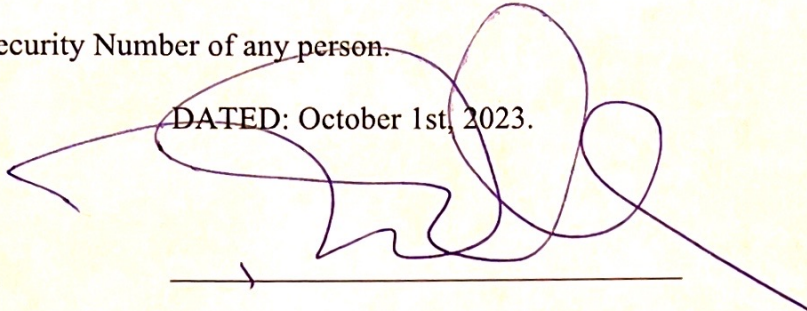


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**AFFIRMATION PURSUANT TO NRS 239B.030**

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

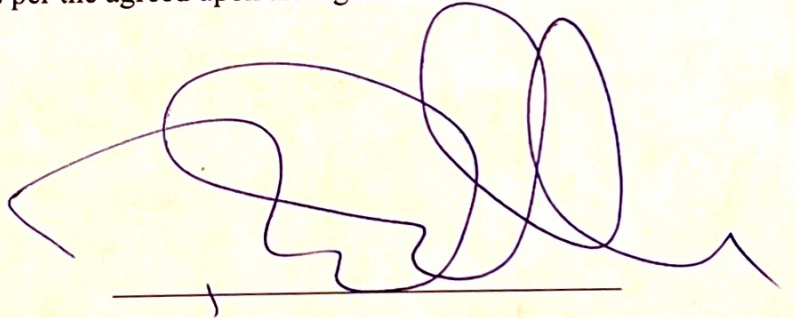
DATED: October 1st, 2023.

A handwritten signature in purple ink, consisting of several large, overlapping loops and a long horizontal stroke extending to the right.

Robert Beadles, Plaintiff

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I hereby certify that on October 1st, 2023, I electronically served all parties of record electronically as per the agreed upon arrangement with the Defense.

A handwritten signature in purple ink, identical to the one above, consisting of several large, overlapping loops and a long horizontal stroke extending to the right.

Robert Beadles, Plaintiff