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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 **REQUEST FOR SUBMISSION OF DEFENDANTS'**
25 **MOTION FOR SANCTIONS**
26


1 It is respectfully requested that the Motion to Sanctions filed by Defendants Washoe
2 County Commissioner Alexis Hill, Washoe County Manager Eric Brown, Washoe County
3 Registrar of Voters Jamie Rodriguez, Washoe County Office of the Registrar of Voters, and
4 Washoe County on September 11, 2023, be submitted to the Court for its review. A
5 proposed order is attached hereto as "Exhibit 1."

6 AFFIRMATION PURSUANT TO NRS 239B.030

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

9 Dated this 28th day of September, 2023.

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By 
LINDSAY L. LIDDELL
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REPRESENTING DEFENDANTS
JAMIE RODRIGUEZ, WASHOE
COUNTY REGISTRAR OF VOTERS,
ERIC BROWN, ALEXIS HILL,
and WASHOE COUNTY

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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, Request for Submission of Defendants' 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 the Request for Submission of Defendants' Motion for Sanctions at the following electronic mail address:

Robert Beadles
beadlesmail@gmail.com

Dated this 28th day September, 2023.


S. Haldeman

INDEX OF EXHIBITS

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Exhibit 1 Proposed Order 24 pages