

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  
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 **REQUEST FOR LEAVE TO FILE MOTION FOR ORAL ARGUMENT ON**  
25 **PLAINTIFF'S MOTION TO STAY ENFORCEMENT OF JUDGMENT PENDING**  
26 **APPEAL**

27 **I. INTRODUCTION**

The Plaintiff-Appellant, Robert Beadles, respectfully requests leave of the Court to file the attached Motion for Oral Argument on the Plaintiff-Appellant's Motion to Stay Enforcement of

1 Judgment Pending Appeal. This request is made in accordance with RULES OF PRACTICE  
2 FOR THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

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4 Rule 3.13. Reconsideration of orders.

5 (a) Leave required. Issues once heard and disposed of will not be renewed in the same  
6 cause except by leave of court granted upon motion. The court may reconsider a decision if the  
7 court overlooked or misunderstood a material fact, or overlooked, misunderstood, or misapplied  
8 law that directly controls a dispositive issue.  
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10 **II. NECESSITY FOR LEAVE TO FILE MOTION**

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12 Given the critical nature of the Plaintiff-Appellant's Motion to Stay Enforcement of Judgment  
13 Pending Appeal and the Court's decision to deny it without oral hearing, the Plaintiff-Appellant  
14 seeks the Court's permission to file a motion for oral argument. The Plaintiff-Appellant firmly  
15 believes that an oral hearing will provide an essential platform for making my record, with a  
16 detailed and comprehensive discussion of the issues at hand, which is pivotal for the fair  
17 resolution of this matter.  
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19 **III. REASONS FOR GRANTING LEAVE**

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21 **Enhanced Judicial Review:** The complexity and significance of the legal and factual issues in  
22 the present case necessitate a more dynamic and interactive form of review that oral arguments  
23 can facilitate.  
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1 **Precedent and Fairness:** Granting leave to file this motion aligns with judicial precedent that  
2 recognizes the value of oral arguments in ensuring justice and fairness, especially in complex  
3 legal matters.

4 **Equity in Judicial Process:** Allowing the Plaintiff-Appellant the opportunity for oral argument  
5 ensures equitable treatment under the law, affording the Plaintiff-Appellant a full and fair chance  
6 to present my case.  
7

#### 8 **IV. Legal Basis for Granting Leave**

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10 In accordance with the legal principle that leave should be freely given, as stated in NRCP  
11 15(a)(2), there is no presence of undue delay, bad faith, or dilatory motive on my part. This ethos  
12 is further supported by legal precedents, including *Stephens v. S. Nev. Music Co.* 89 Nev. 104,  
13 105-06, 507 P.2d 138, 139 (1973), *DeSoto v. Yellow Freight Sys., Inc.*, 957 F.2d 655, 658 (9th  
14 Cir. 1992), and *Nutton v. Sunset Station, Inc.*, Court of Appeals of Nevada, June 11, 2015, 131  
15 Nev. 279, 357 P.3d 966. These cases reinforce the notion that in the absence of detrimental  
16 factors, the court should grant leave to ensure justice and procedural fairness.  
17

#### 18 **V. CONCLUSION**

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20 In consideration of the importance of oral argument in complex legal matters and the need for a  
21 thorough and equitable judicial review, the Plaintiff-Appellant respectfully requests that the  
22 Court grant this request for leave to file the Motion for Oral Argument. This request is made in  
23 the interest of justice and to ensure a fair and comprehensive consideration of the Plaintiff-  
24 Appellant's Motion to Stay Enforcement of Judgment Pending Appeal.  
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**Respectfully submitted,**

Dated: 01/09/24

Submitted,

By: \_\_\_\_\_

ROBERT BEADLES, Plaintiff Pro Se

**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 9th, 2024.

\_\_\_\_\_

Robert Beadles, Plaintiff

**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

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Robert Beadles, Plaintiff