

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

23 Respondents.

24 **Request for Leave to File Motion to Transfer Exhibits to Supreme**
25 **Court**

26 **Introduction**

27 Respectfully, I approach the Supreme Court of Nevada with this request for
28 leave, seeking authorization to file a motion for the transfer of essential
exhibits from the District Court, Judicial District 1. The crucial nature of
these exhibits in the appellant's arguments, as evidenced by their extensive

1 citation, necessitates their inclusion for a full and equitable review in the
2 appellate process.
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5 **Legal Basis for Granting Leave**

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

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24 **Integral to Legal Arguments:** The more than 160 exhibits are not merely
25 supportive but are integral to the foundation of the case's legal arguments.
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1 **Ensuring Justice and Fairness:** The absence of these exhibits
2 significantly compromise the depth and fairness of the appellate review.
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4 **Specific Reasons for Exhibit Transfer**

5 **Venue Change Dismissal:** The exhibits are key in illustrating the alleged
6 bias in the original venue, such as Exhibit 132, 154-56.
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8 **Dismissal Under Rule 12(b)(5):** For a small example, Exhibits 11-24, 97,
9 101, 109 and 111 are vital for challenging the lower Court's decision to
10 improperly dismiss the case pursuant to NRCP 12(b)(5).
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13 **Second Cause of Action:** Exhibits such as 134 through 140, 143, 149, 168-
14 170 are crucial for substantiating the allegations.
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16 **Argument for Granting Leave**

17 **Adherence to Legal Standards:** This request aligns with the guiding
18 principle that amendments should be freely granted when justice requires,
19 as per NRCP 15(a)(2).
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22 **Precedent Support:** The aforementioned legal precedents bolster this
23 request, emphasizing the court's obligation to facilitate justice through
24 procedural fairness.
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1 **No Undue Delay or Bad Faith:** My request is timely and made in good
2 faith, devoid of any intention to delay or derail the proceedings.
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4 **Conclusion**

5 In light of the legal precedents and rules cited, and considering the pivotal
6 role of the exhibits in question, this request for leave to file a motion for the
7 transfer of exhibits from the District Court is submitted with a sincere
8 appeal to the principles of justice and procedural fairness. The inclusion of
9 these exhibits is not just a procedural formality; it is a fundamental aspect
10 of ensuring a fair and comprehensive appellate review. Therefore, I
11 respectfully request the Supreme Court grant this motion, enabling a
12 thorough and equitable consideration of the case at hand.
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19 Respectfully submitted,

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21 By: _____
22

23 ROBERT BEADLES, Appellant In Pro Per,

24 10580 N. McCarran Blvd. #115, Apt. 386,

25 Reno, NV 89503 916-573-7133
26
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3 **AFFIRMATION PURSUANT TO NRS 239B.030**

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

6 DATED: January 12th, 2024.
7
8

9 _____
10 Robert Beadles, Appellant In Pro Per
11

12 **CERTIFICATE OF SERVICE**
13

14 Pursuant to NRCP 5(b), I hereby certify that on January 12th, 2024, I served
15 all parties by electronically emailing the defense counsel and by sending via
16 first-class mail with sufficient postage prepaid to Lindsay Liddell, the
17 respondents' defense attorney.

18 Haldeman, Suzanne shaldeman@da.washoecounty.gov

19 Hickman, Elizabeth ehickman@da.washoecounty.gov

20 Liddell, Lindsay L lliddell@da.washoecounty.gov

21 And mailed to:

22 One South Sierra Street Reno, Nevada 89501
23
24

25 _____
26 Robert Beadles, Appellant In Pro Per
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