

ROBERT BEADLES
10580 N. McCarran Blvd. #115, Apt. 386
Reno, NV 89503
Plaintiff, Pro Se

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA IN
AND FOR THE COUNTY OF WASHOE**

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.: CV23-01341

DEPT. NO.:

**COMPLAINT FOR EQUITABLE,
INJUNCTIVE RELIEF, PETITION FOR
REMOVAL OF PUBLIC OFFICIAL
FROM OFFICE,
AND PUNITIVE DAMAGES**

**(Jury Trial Demanded)
Automatically Exempt from Arbitration
NAR 5(a)(1)(G)—Declaratory Relief**

2ND MOTION TO REQUEST JUDGE SIMONS

Plaintiff, Robert Beadles, hereby moves this Honorable Court to request Judge Lynne K. Simons as the assigned judge for the above-referenced case. Petitioner respectfully requests this Court to consider the following reasons in support of this motion:

Plaintiff now in both cases filed, CV23-01283 and now CV23-01341 has received the same judge. This appears to contradict Rule 21 from the case In Matter of the Adoption of Amendments, Adkt 446 in where the cases are randomly assigned. Plaintiff, since 8/7/23 has been without a judge assigned. The nature of cause 2, NRS 283.440 is an accelerated timetable and requires the court to issue citations today 8/9/23 to 8/14/23 at the latest.

Plaintiff respectfully requests the Honorable Judge Simons take this case as numerous authorities state her ability to. For instance, Sell v. Diehl (In re T.T.H.) cites three authorities (NRS 3.223, NRS 3.025(3), and EDCR 1.30(15)) that discuss the assignment of cases to specific judges or divisions. Similarly, Ferguson v. State discusses the authority of the chief judge to assign cases to specific judges or departments within a district court. Other authorities, such as ADOPTION OF ADD'L RULES LAS VEGAS JUSTICE CRT. and Matter of Amendment of Eighth Jud. Dist. Court, Adkt 418, also contain information about the authority of the chief judge to assign or reassign cases. In both cases, the chief judge is given the authority to reassign cases for convenience or necessity. Additionally, Nev. Rev. Stat. § 3.025, which outlines the duties of the Chief Judge in certain judicial districts, including the authority to assign cases to specific judges.

Plaintiff believes that Judge Simons' experience and expertise make her the ideal judge to preside over this case.

Plaintiff believes that Judge Simons' ethical, fair and impartial approach to the law will ensure that the case is decided on its merits.

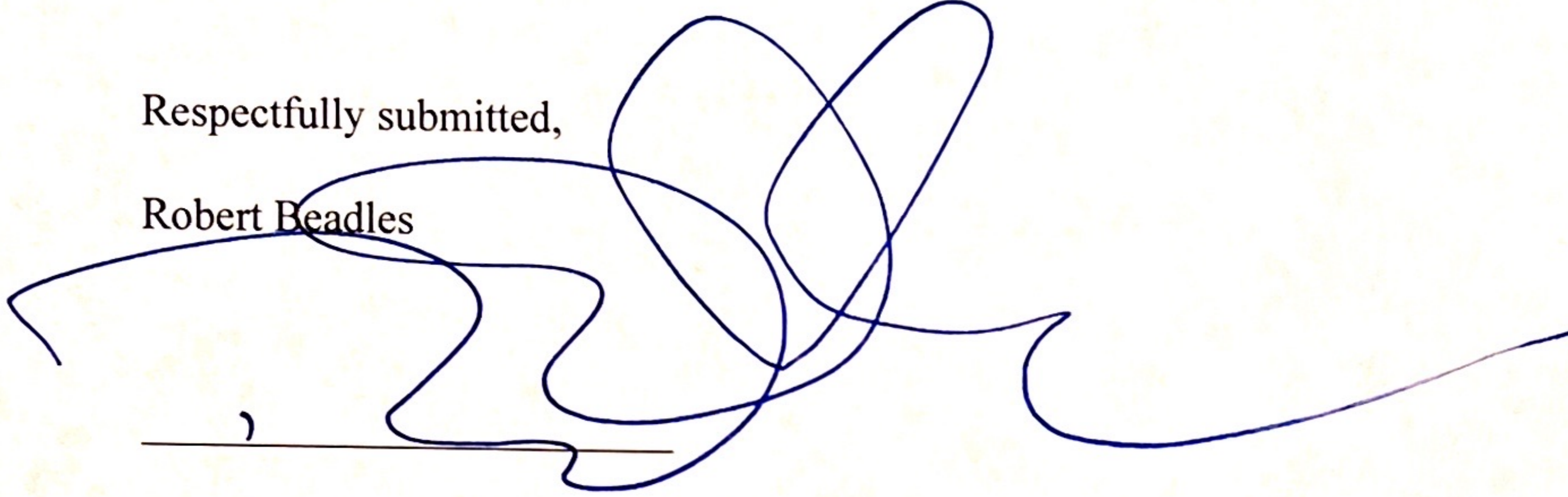
Plaintiff believes that Judge Simons' calendar allows for a timely resolution of this case.

Plaintiff has no prior relationship with Judge Simons that would compromise the integrity of the judicial process.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to grant this motion and assign Judge Simons as the presiding judge for this case.

Respectfully submitted,

Robert Beadles



DATED: 8/9/23

1
2 SECOND JUDICIAL DISTRICT COURT
3 COUNTY OF WASHOE, STATE OF NEVADA

4 AFFIRMATION
5 Pursuant to NRS 239B.030 and 603A.040

6 The undersigned does hereby affirm that the preceding document, *(title of document)*

7 2nd Motion For Request of Judge Simons

8 file in case number: CV23-01341

9
10 (mark one)

11 Document does not contain the personal information of any person.

12
13 Document contains the personal information of a person as required by: (mark one)

14 A specific state or federal law, to wit: *(write the specific state or federal law)*

15 _____
16 For the administration of a public program

17 For the administration for a federal or state grant

18 Confidential Family Court Information Sheet (NRS 125.130, NRS 125.230, and
19 NRS 125B.055)

20
21
22 DATED this *(day)* 9th day of *(month)* August, 2023.

23
24 Submitted By: *(Your signature)* _____

25 *(Print your name)* Robert Beadles

26 *(Attorney for)* N/A