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

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

MR ROBERT BEADLES, an individual,

Plaintiff,

Case No.: CV23-01341

Dept. No.: 9

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.

MOTION TO COMPEL COURT TO ISSUE CITATIONS AGAINST DEFENDANTS

COMES NOW, the Plaintiff, Robert Beadles, and pursuant to NRS 283.440, respectfully moves this Court to compel the issuance of citations against the Defendants, JAMIE RODRIGUEZ, in her official capacity as Registrar of Voters; ERIC BROWN, in his official capacity as WASHOE COUNTY MANAGER; and ALEXIS HILL, in her official capacity as CHAIRWOMAN OF THE WASHOE COUNTY BOARD OF COMMISSIONERS. In support thereof, Plaintiff states the following:

1 On 8/4/23, Plaintiff filed a complaint alleging acts of malpractice, malfeasance, and nonfeasance
2 by the Defendants pursuant to NRS 283.440.

3 The complaint was properly served upon the Defendants on 8/8/23, as evidenced by the attached
4 affidavit of service.

5 Pursuant to NRS 283.440, upon the proper filing and service of such a complaint, the court is
6 mandated to issue citations against the defendants named therein.

7 As of 8/13/23, the court has not yet issued the requisite citations against the Defendants in
8 compliance with NRS 283.440.

9 The delay in issuing these citations impedes Plaintiff's ability to seek timely redress and the prompt
10 resolution that NRS 283.440 seeks to ensure.

11 In light of the foregoing, Plaintiff respectfully urges this Court to issue citations against the
12 Defendants in accordance with NRS 283.440, and to do so no later than 8/14/23.

13 WHEREFORE, Plaintiff respectfully requests this Court:
14

15 To compel the issuance of citations against the Defendants as mandated by NRS 283.440;
16

17 To grant such other and further relief as the Court may deem just and proper.
18

19 Dated: 8/13/23
20

21 Respectfully submitted,
22

23 By: _____
24

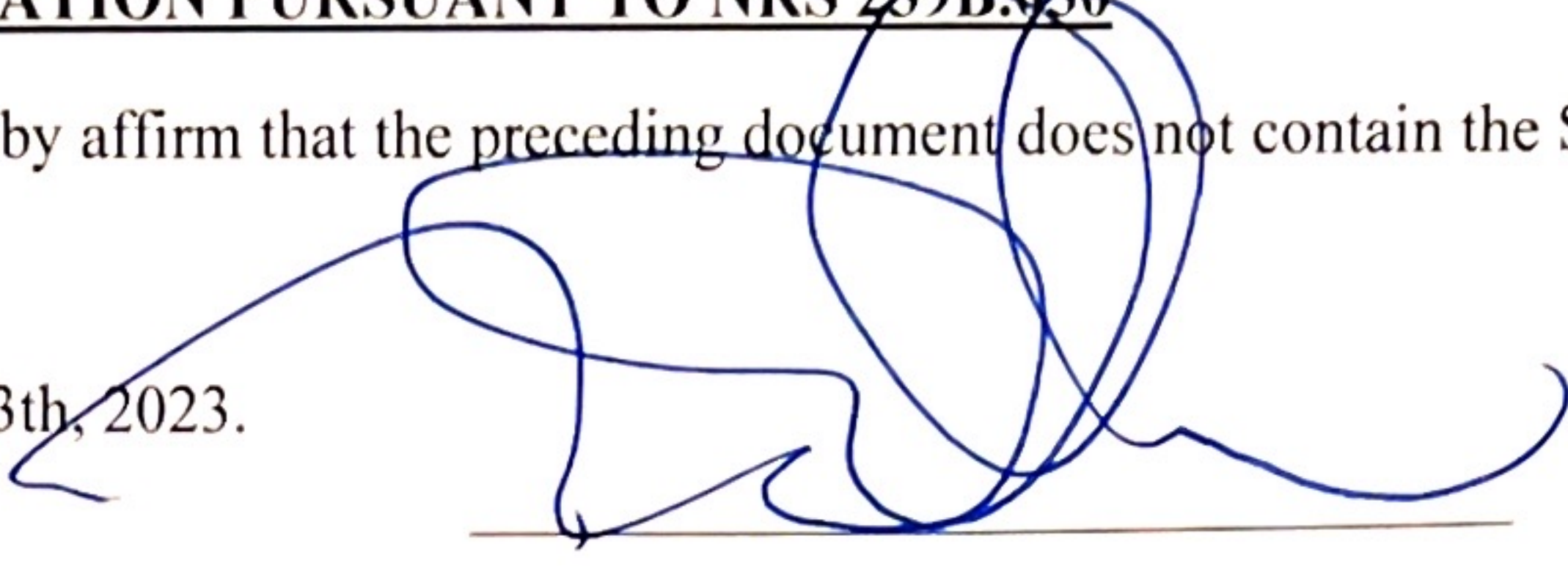
25 ROBERT BEADLES, Plaintiff Pro Se
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AFFIRMATION PURSUANT TO NRS 239B.030

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

DATED: August 13th, 2023.

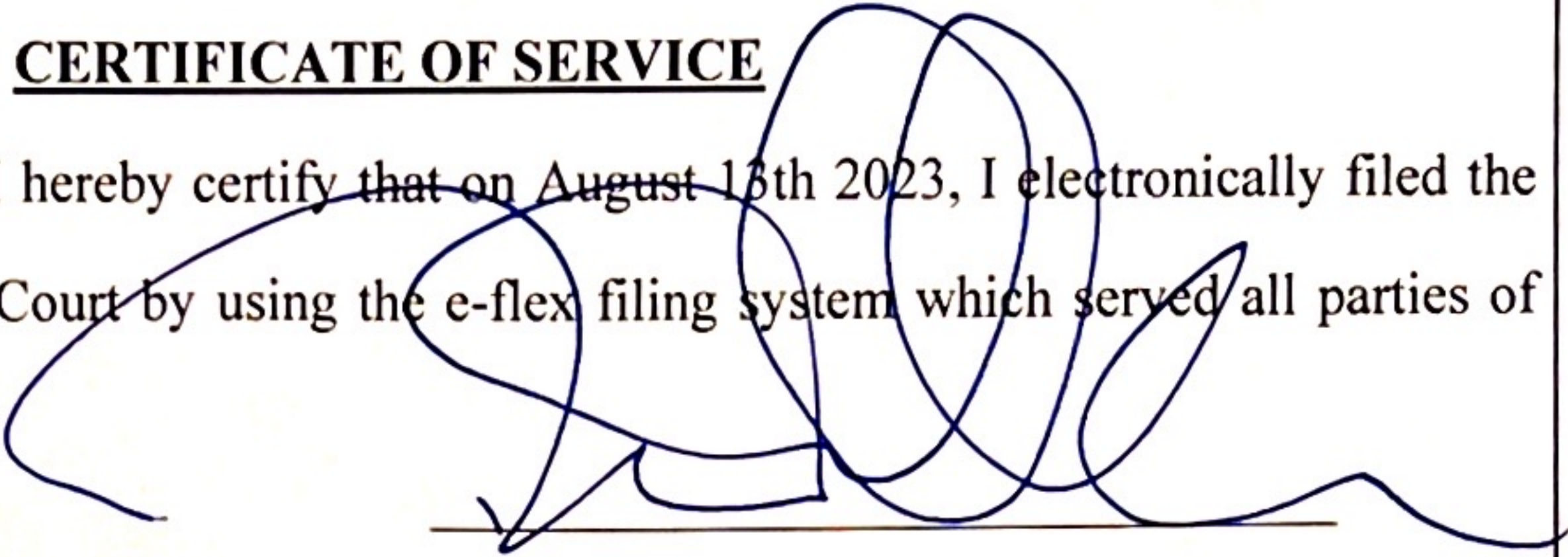


Robert Beadles, Plaintiff

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CERTIFICATE OF SERVICE

Pursuant to NRCPP 5(b), I hereby certify that on August 16th 2023, I electronically filed the foregoing with the Clerk of the Court by using the e-flex filing system which served all parties of record electronically.

A handwritten signature in blue ink, appearing to read 'Robert Beadles', is written over a horizontal line. The signature is somewhat stylized and overlaps the text of the certificate.

Robert Beadles, Plaintiff

AFFIDAVIT OF SERVICE

STATE OF NEVADA)

COUNTY OF WASHOE)

I, George Badillo, being duly sworn depose and says:

At all times herein affiant was and is a citizen of the United States, over 18 years of age, and not a party to or interested in the proceeding in which this affidavit is made.

The affiant received 1 copy (ies) of the DISCOVERY, & EXHIBITS on the 7th day of August of 2023, and served the same on the 8th day of August, 2023 at 02:15 PM, by

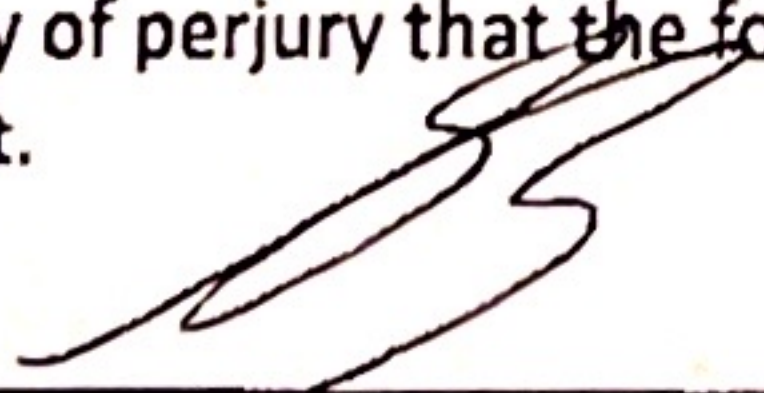
Serving the defendant/witness, Alexis Hill by personally delivering a copy with: Lydia, Office Assistant (Employee of Defendant), a person of suitable age and discretion residing at the defendant's/witness's usual place of abode located at 1001 E 9th St., Reno, NV 89512

Description of person served: Race: Asian
Gender: F
Approx Age: 37
Height: 5'2"
Weight: 110
Hair: Black

Fee For Service \$45.00 Mileage \$0.00 Total Charge \$45.00

COURT FILE # - SJDCN-CV23-01341

In accordance with NRS 53.045 I declare under penalty of perjury that the foregoing is true and current.



(signature)

Executed on: 8/9/2023
(date)

George Badillo, R-2022-19844
SMART LEGAL DOCUMENT SERVICE
License # 1767

AFFIDAVIT OF SERVICE

STATE OF NEVADA)

COUNTY OF WASHOE)

I, George Badillo, being duly sworn depose and says:

At all times herein affiant was and is a citizen of the United States, over 18 years of age, and not a party to or interested in the proceeding in which this affidavit is made.

The affiant received 1 copy (ies) of the DISCOVERY, & EXHIBITS on the 7th day of August of 2023, and served the same on the 8th day of August, 2023 at 02:15 PM, by

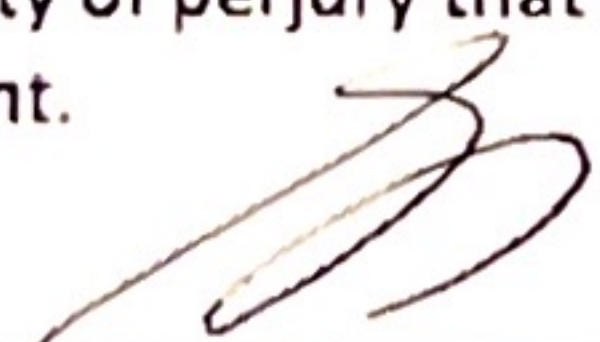
Serving the defendant/witness, Eric Brown by personally delivering a copy with: Lydia, Office Assistant (Employee of Defendant), a person of suitable age and discretion residing at the defendant's/witness's usual place of abode located at 1001 E 9th St., Reno, NV 89512

Description of person served: Race: Asian
Gender: F
Approx Age: 37
Height: 5'2"
Weight: 110
Hair: Black

Fee For Service \$45.00 Mileage \$0.00 Total Charge \$45.00

COURT FILE # - SJDCN-CV23-01341

In accordance with NRS 53.045 I declare under penalty of perjury that the foregoing is true and current.



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(date)

George Badillo, R-2022-19844
SMART LEGAL DOCUMENT SERVICE
License # 1767

AFFIDAVIT OF SERVICE

STATE OF NEVADA)

COUNTY OF WASHOE)

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The affiant received 1 copy (ies) of the DISCOVERY, & EXHIBITS on the 7th day of August of 2023, and served the same on the 8th day of August, 2023 at 02:15 PM, by

Serving the defendant/witness, Washoe County (Eric Brown) by personally delivering a copy with: Lydia, Office Assistant (Employee of Defendant), a person of suitable age and discretion residing at the defendant's/witness's usual place of abode located at 1001 E 9th St., Reno, NV 89512

Description of person served: Race: Asian
Gender: F
Approx Age: 37
Height: 5'2"
Weight: 110
Hair: Black

Fee For Service \$45.00 Mileage \$0.00 Total Charge \$45.00

COURT FILE # - SJDCN-CV23-01341

In accordance with NRS 53.045 I declare under penalty of perjury that the foregoing is true and current.



(signature)

Executed on: 8/9/2023
(date)

George Badillo, R-2022-19844
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License # 1767

AFFIDAVIT OF SERVICE

STATE OF NEVADA)

COUNTY OF WASHOE)

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At all times herein affiant was and is a citizen of the United States, over 18 years of age, and not a party to or interested in the proceeding in which this affidavit is made.

The affiant received 1 copy (ies) of the DISCOVERY, & EXHIBITS on the 7th day of August of 2023, and served the same on the 8th day of August, 2023 at 02:05 PM, by

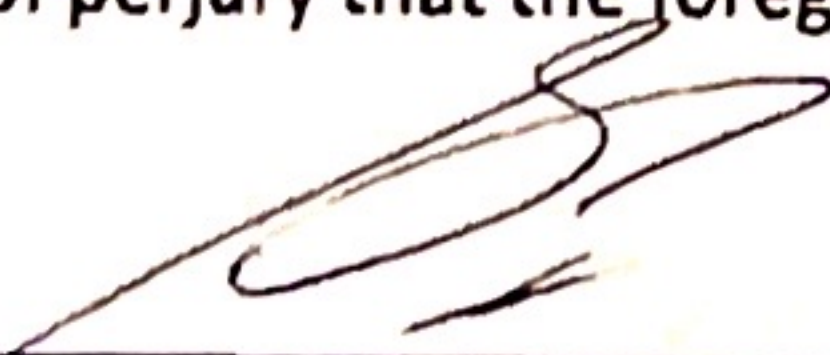
Delivering and leaving a copy with the defendant/witness, Jamie Rodriguez at 1001 E 9th St..

Description of person served: Race: Hispanic
Gender: F
Approx Age: 40
Height: 5'10"
Weight: 130
Hair: Brown

Fee For Service \$45.00 Mileage \$0.00 Total Charge \$45.00

COURT FILE # - SJDCN-CV23-01341

In accordance with NRS 53.045 I declare under penalty of perjury that the foregoing is true and current.



(signature)

Executed on: 8/9/2023

George Badillo, R-2022-19844
SMART LEGAL DOCUMENT SERVICE
License # 1767

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

3
4 AFFIRMATION
Pursuant to NRS 239B.030 and 603A.040

5
6 The undersigned does hereby affirm that the preceding document, *(title of document)*

7 Motion To Compel Court To Issue Citations against Defendants

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)* 13th day of *(month)* August, 2023

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

25 *(Print your name)* Robert Beadles

26 *(Attorney for)* N/A