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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 FOR RECUSAL OF JUDGE

COMES NOW the Plaintiff, Robert Beadles, pursuant to the provisions of the Nevada Revised Statutes, and respectfully moves this Court for the recusal of Judge Scott Freeman, and in support thereof, states as follows:

1 **INTRODUCTION**

2 This action was filed in the Washoe County District Court to address alleged violations of the
3 Nevada Constitution Articles 1, 2, 15, and the Voter's Bill of Rights, malfeasance, malpractice,
4 and nonfeasance by the Defendants under NRS 283.440 Removal of Officers.
5

6 **FAILURE TO ADHERE TO STATUTORY TIMELINES**

7 The Nevada Revised Statutes (NRS 283.440) mandates that citations must be issued within a
8 timeline of 5 to 10 days upon the filing of a complaint. As of this date, 12 days have elapsed
9 since the filing of the complaint, and no citations have been issued, representing a clear departure
10 from the statute's requirements and depriving Plaintiff of his right to due process.
11

12 **LACK OF COMMUNICATION**

13 In an attempt to address this delay, the undersigned has made diligent efforts to communicate
14 with the Court. Despite leaving three voicemails and sending three emails, the Judge and the
15 Judicial Assistant have not provided any response, depriving the Plaintiff of the right to timely,
16 effective communication, and due process.
17

18 Emails: 8/11/23, 8/13/23, 8/14/23

19 Voicemails: 8/14/23, 8/15/23, 8/15/23
20
21

22 **FAILURE TO ADDRESS MOTIONS**

23 The Plaintiff has duly filed a Motion To Compel Court to Issue Citations, that has not been
24 addressed. Plaintiff has filed a Motion to Change Venue due to apparent biases and conflicts of
25 interest. As of this date, the Court has not addressed or ruled on these motions, further delaying
26 the resolution of the case and hindering the Plaintiff's right to a fair and timely hearing.
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CONFLICTS OF INTEREST

It has come to the Plaintiff's attention that Judge Freeman maintains both personal and professional relationships with the Defendants. Such relationships create an apparent conflict of interest and raise concerns about the impartiality of proceedings under the current jurisdiction. Additionally, it has come to the Plaintiff's attention that the Defense, Judge, and Defendants have been closely working together regarding this case, further showing the appearance of impropriety.

REQUEST FOR RECUSAL

Due to the aforementioned reasons, which suggest bias, potential conflict of interest, and failure to adhere to mandated procedures, the Plaintiff respectfully submits that the integrity of the judicial process requires Judge Freeman's recusal from the instant case.

WHEREFORE, the Plaintiff respectfully requests:

- That Judge Freeman recuses himself from the above-captioned case.
- That this case be reassigned to another judge devoid of the biases and conflicts described herein and immediately address all the unaddressed motions Plaintiff has filed.
- For such other and further relief as the Court may deem just and proper.

DATED this 16th day of August, 2023.

Respectfully 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: August 16th, 2023.

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Robert Beadles, Plaintiff

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CERTIFICATE OF SERVICE

Pursuant to NRCP 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.



Robert Beadles, Plaintiff



Robert Beadles <beadlesmail@gmail.com>

Re: Conflicts-CV23-01341

1 message

Robert Beadles <beadlesmail@gmail.com>

Mon, Aug 14, 2023 at 6:06 PM

To: Brianne.Ward@washocourts.us

Good evening,

I haven't heard back from you on any emails I have sent you. Additionally, I left a message on your voicemail today. The court was required to issue the citations today, but that appears not to have happened. Can you tell me when this will be done? If the court did not send out the citations today, the court appears to potentially be in violation of its responsibilities under NRS 283.440 and potentially my due process rights as well. Please speak with the Honorable Judge and advise as soon as possible.

Thank you. Have a good evening.

Robert Beadles

On Sun, Aug 13, 2023 at 7:48AM Robert Beadles <beadlesmail@gmail.com> wrote:

Good morning Brianne,

Pursuant to NRS 283.440, the Honorable Court has until Monday, 8/14/23, to issue citations to the defendants. I would appreciate it if you could inform me whether the Honorable Judge intends to proceed with the case, as time is pressing.

To facilitate the process, I have drafted the citations on behalf of the Honorable Court. However, as there are no dates or times currently set, I'm unable to file them in Eflex. I have attached them to this email for your convenience.

Should the Honorable Judge consider recusal, please ensure these documents are forwarded to the successor judge promptly tomorrow.

Kindly keep me informed.

Thank you,

Robert Beadles

On Fri, Aug 11, 2023 at 10:34AM Robert Beadles <beadlesmail@gmail.com> wrote:

Good morning Brianne,

I was recently informed that the Honorable Judge Freeman was assigned to my case, CV23-01341. I realize this was done randomly; therefore, I'd like to mention that there are obvious and severe conflicts with the Honorable Judge overseeing this case. I would like to give him the opportunity to recuse himself so this innocent assignment does not become a significant issue.

Due to the nature of this expedited case, the court must issue citations to the defendants by 8-14-23 at the latest. Knowing the timelines, time is of the essence. Please keep me posted on how the Honorable Judge would like to proceed today.

Thank you so much, and have a great day.

*Kind Regards,***Robert Beadles**

--

Kind Regards,

Robert Beadles

--

Kind Regards,

Robert Beadles

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 Motion To Recuse Judge

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)* 16th day of *(month)* August, 2023.

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



25 *(Print your name)* Robert Beadles

26 *(Attorney for)* N/A
27
28