

1 ROBERT BEADLES

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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.

**[Oral Argument Requested]**

24 **MOTION FOR LEAVE TO FILE MOTION TO SET ASIDE ORDER GRANTING**  
25 **DEFENDANTS' MOTION FOR ATTORNEY'S FEES AND COSTS**

26 Pursuant to the Rules of Practice for the First Judicial District Court of the State of Nevada,

27 particularly under Rule 3.13, I request leave of this Court to file a Motion to Set Aside Order

Granting Defendants' Motion for Attorney's Fees and Costs.

1 **INTRODUCTION**

2 This motion seeks the court's reconsideration of its recent order granting the defendants attorney  
3 fees and costs, which infringes upon my rights and contravenes procedural fairness and due  
4 process.

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6 **ARGUMENTS IN SUPPORT OF THE MOTION**

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9 **Violation of Procedural Rules and Due Process:** This court's rapid action in granting the  
10 Defendant's Motion for Attorney Fees and Costs without allowing the requisite 14 days for  
11 opposition violates NRCP Rule 12 (A) (1)(i) and the court's Rule 3.8. This denial of due process  
12 and breach of procedural norms necessitates reconsideration.

13  
14 **Pending Motions and Oppositions:** Several critical documents filed by the Plaintiff, including a  
15 Motion to Stay Enforcement of Judgment Pending Appeal and an Opposition to Defendant's  
16 Motion for Attorney's Fees and Costs, remain unaddressed. It is essential for the integrity of this  
17 process that these filings are duly considered.

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19  
20 **Judicial Economy and Fairness:** In line with the principle of Judicial Economy cited in favor  
21 of the defense, it is equitable to apply the same principle to stay all orders and enforcement  
22 actions until the Supreme Court's ruling on the Plaintiff's appeal. This approach not only serves  
23 the interests of fairness but also prevents potential unnecessary judicial labor.  
24

1 **Request for Oral Argument:** In accordance with this court's Rule 3.12, a request is made for an  
2 oral argument to ensure comprehensive understanding and addressal of the matters in this  
3 motion.

4  
5 **CONCLUSION**

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7  
8 Given the significant concerns regarding procedural violations and the breach of due process, it  
9 is respectfully submitted that this Motion for Leave to File Motion to Set Aside Order Granting  
10 Defendant's Motion for Attorney's Fees and Costs should be granted. This action will uphold the  
11 principles of fairness and justice, ensuring that all motions and oppositions are properly  
12 addressed and that the integrity of the appellate process is maintained.

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14  
15 Dated: 12/20/23

16  
17 Submitted,

18  
19 By: \_\_\_\_\_

20 ROBERT BEADLES, Plaintiff Pro Se

