

1 ROBERT BEADLES  
2 10580 N. McCarran Blvd. #115, Apt. 386  
3 Reno, NV 89503  
4 *Plaintiff, Pro Se*

5 **FIRST JUDICIAL DISTRICT COURT OF NEVADA**  
6 **CARSON CITY**

7 MR ROBERT BEADLES, an individual,  
8 Plaintiff,  
9 vs.

Case No.: 23 OC 00105 1B  
Dept. No.: 1

10 JAMIE RODRIGUEZ, in her official capacity as  
11 Registrar of Voters and in her personal capacity;  
12 the WASHOE COUNTY REGISTRAR OF  
13 VOTERS, a government agency; ERIC BROWN in  
14 his official capacity as WASHOE COUNTY  
15 MANAGER and in his personal capacity, ALEXIS  
16 HILL in her official capacity as CHAIRWOMAN  
17 OF WASHOE COUNTY BOARD OF  
18 COMMISSIONERS and in her personal capacity;  
19 WASHOE COUNTY, Nevada a political  
20 subdivision of the State of Nevada, and DOES I-X;  
21 and ROE CORPORATIONS I-X.

Defendants.

22 **MOTION TO STAY ENFORCEMENT OF JUDGMENT PENDING APPEAL**

23 **Pursuant to NRCP Rule 62**

24 **I. INTRODUCTION**

25 This motion is submitted by Robert Beadles, the Plaintiff in this court and Appellant in the  
26 Supreme Court case #87683, seeking an immediate stay of enforcement of the judgment pending  
27 the appeal's outcome, under Nevada Rules of Civil Procedure Rule 62.

1 **II. NECESSITY OF STAY PENDING APPEAL**

2 **Irreparable Harm and Prejudice to Appellant:** The enforcement of the judgment during the  
3 appeal process poses a significant risk of irreparable harm and prejudice to the Appellant. The  
4 immediate enforcement of the judgment, including the award of costs to the Respondents, would  
5 unfairly punish me, when I believe and the law supports that my case should never have been  
6 dismissed, especially when the mountains of evidence and allegations are in conformance with  
7 NRCPC Rule 8(a)(2), which, based solely on law, should defeat an NRCPC Rule 12(b)(5). An  
8 example of this is that I have standing court orders, exhibit 72, which grant me the right to  
9 observe the entire vote-counting process; I was denied, as were all Nevadans. Therefore,  
10 according to NRCPC Rule 8(a)(2) - a short and plain statement of the claim showing that the  
11 pleader is entitled to relief - I have met the first part of the rule, in stating a claim. The second  
12 part of the rule states I must be entitled to relief, where I asked the court to enjoin the defendants  
13 to follow the court orders, this conforms to the entire Rule 8(a)(2) which overcomes a Rule  
14 12(b)(5) motion, in this one of hundreds of examples I can list. It is crucial that the Supreme  
15 Court rules on whether NRCPC Rule 8(a)(2) and Rule 12(b)(5) are now interpreted differently  
16 from what all case law shows, and if court orders are no longer worth the paper they are printed  
17 on. I ask you to stay the defense's motion and the court orders, and allow the Supreme Court to  
18 rule first, before enforcing the payment of any attorney fees and costs.  
19  
20  
21

22  
23 **Preservation of the Status Quo:** Granting a stay would preserve the status quo while the appeal  
24 is under consideration. This is crucial to prevent any change in circumstances that could render  
25 the appeal moot or significantly alter the Appellant's position.  
26

1 **Serious Legal Questions Raised:** The appeal raises substantial questions of law, particularly  
2 concerning the alleged unlawful dismissals and procedural irregularities. The significance of  
3 these legal questions warrants a stay to ensure they are fully and fairly adjudicated.  
4

5 **III. BOND OR SECURITY (if applies)**

6 It's debatable what subsection under NRCP Rule 62 applies, several could, so just to cover all  
7 the bases I have attached a check for full payment of all the defense attorney fees and costs the  
8 defense has requested.  
9

10 **Provision of Security:** In accordance with NRCP Rule 62(d), if this rule should apply, I am  
11 prepared to provide a bond or other form of security to stay the enforcement of the judgment. A  
12 check, representing the defense's attorney costs and fees as security, is attached herewith. This  
13 check will be held by the defense and only cashed should the appeal and my motions be resolved  
14 unfavorably to me.  
15

16  
17 **Adequacy of Security:** The provision of this check as security demonstrates my commitment to  
18 satisfying any obligations as determined by the final outcome of the appeal. It also underscores  
19 my confidence in the merits of my appeal and my intention to abide by the court's decision.  
20

21 **IV. CONCLUSION AND PRAYER FOR RELIEF**

22  
23 In light of the arguments presented and the security provided, I request this Court to grant a stay  
24 of enforcement of the judgment pending the resolution of the appeal. This relief is sought to  
25 prevent irreparable harm, maintain the status quo, and ensure the thorough and fair adjudication  
26 of the significant legal questions at hand.  
27

1 Dated: 12/13/23

2  
3 Submitted,

4  
5 By: \_\_\_\_\_

6 ROBERT BEADLES, Plaintiff Pro Se

7  
8  
9 **AFFIRMATION PURSUANT TO NRS 239B.030**

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

12 DATED: December 13<sup>th</sup>, 2023.

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14 \_\_\_\_\_  
15 Robert Beadles, Plaintiff

**CERTIFICATE OF SERVICE**

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Pursuant to NRCP 5(b), I hereby certify that on December 13<sup>th</sup>, 2023, I served all parties by electronically emailing the defense counsel and by sending via first-class mail with sufficient postage prepaid to Lindsay Liddell, the respondents' defense attorney.

- Haldeman, Suzanne shaldeman@da.washoecounty.gov
- Hickman, Elizabeth ehickman@da.washoecounty.gov
- Liddell, Lindsay L lliddell@da.washoecounty.gov

And mailed to:  
One South Sierra Street Reno, Nevada 89501

\_\_\_\_\_  
Robert Beadles, Plaintiff