

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,

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.

24 **REQUEST TO SUBMIT MOTION TO STAY ENFORCEMENT OF JUDGMENT**
25 **PENDING APPEAL**

26 Pursuant to the RULES OF PRACTICE FOR THE FIRST JUDICIAL DISTRICT COURT OF
27 THE STATE OF NEVADA Rule 3.11, the Plaintiff and Appellant, Robert Beadles, hereby
respectfully requests the Court to submit for decision the following motion:

Identification of the Party: The motion was filed by Robert Beadles, the Plaintiff in the lower
court and the Appellant in this Supreme Court appeal.

1 **Name of the Motion:** "Motion to Stay Enforcement of Judgment Pending Appeal."
2

3 **Date of Filing:** 12/14/23
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5 **Proof of Service:** Attached herewith is the proof of service on the Defendants and Respondents,
6 evidencing that they have been served with a copy of this motion as required by the Nevada
7 Rules of Civil Procedure.
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9 The motion for a stay is essential to prevent irreparable harm to the Appellant and to maintain
10 the status quo while the substantial legal questions raised in the appeal are adjudicated. In
11 accordance with NRCP Rule 62, the Appellant has provided a check as security, covering the full
12 amount of the defense's attorney fees and costs, demonstrating my commitment to satisfying any
13 obligations as determined by the final outcome of the appeal.
14

15 **Conclusion:** In consideration of the above, and in accordance with Rule 3.11, I request that the
16 Court consider and rule on the "Motion to Stay Enforcement of Judgment Pending Appeal" as
17 promptly as possible.
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19
20 Dated: 12/13/23
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22 Submitted,
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24 By: _____
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26 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: December 13th, 2023.

Robert Beadles, Plaintiff

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that on December 13th, 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