

MAR 11 2021

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY: *[Signature]*
DEPUTY CLERK

Valentina Monee Knight
Appellant,

No. 82316

THE STATE OF NEVADA
Respondent,

APPEALANTS MOTION TO REQUEST THE COURT TO STAY
THE ABOVE MENTIONED CASE IN LIGHT OF NEWLY
UNEXHAUSTED CLAIMS HAVE SURFACED AND EVIDENCE,

COMES NOW the petitioner, Valentina Knight, in the above
styled case, in PROSE, files this motion to humbly ask
that the court stay this Habeas petition and allow appellant
to return to state court to present newly discovered
evidence and unexhausted claims.

1) On September 22, 2020, a letter was drafted by
the counsel on file at the time of sentencing that
would substantiate claims of violation of my sixth
amendment rights. Ineffective Assistance of counsel
claims were newly discovered and per *Pellegrini v. State*,
117 Nev. 860 (2001), would result in a miscarriage of
justice. ~~claims~~ are failed to be considered.

RECEIVED
MAR 10 2021
ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK


A) After due diligence valid claims surfaced that could
not have existed prior to the filing of the states
Habeas corpus "NRS 34.800 (1)(A). 21-07173

2) After due diligence it was discovered additional unexhausted claims that would also violate my sixth amendment rights under ineffective assistance of counsel, newly discovered evidence not presented by counsel that would prove actual innocence. Under United States v. Agurs, 427 U.S. 97 (1976), if this evidence was presented and pursued, "it will likely produce a different outcome at a retrial,

CONCLUSION

For the above stated reason, I, Valentina Knight, hereby respectfully move the court to stay this petition of Habeas Corpus for the opportunity to exhaust newly discovered evidence and unexhausted new claims.

cc: Supreme Court of The State of Nevada
Attorney General / Carson City
Clark County District Attorney
Eighth District Court Clerk


Valentina Knight # 1228728
Florence Meekure Womens Correctional Center,
4370 Smiley RD
Las Vegas, NV 89115


CERTIFICATE OF SERVICE

I certify that on the date indicated below, I served a copy of this motion to stay Case NO. 82316 to exhaust newly discovered evidence and claims upon all parties to the appeal as follows:

By mailing it in the internal mailing system provided to inmates at Florence Meckre Womens Correctional Center to the following addresses:

- Clerk of the Supreme Court of Nevada,
201 South Carson Street, Carson City, Nevada 89701.
- Eighth District Court Clerk, 333 Las Vegas Boulevard South, Las Vegas, NV 89101
- Clark County District Attorney, 200 Lewis Avenue Las Vegas, Nevada 89155
- Attorney General, Heroes' Memorial Building
Capitol Complex, Carson City, Nevada, 89710

Dated this 4th Day of
March, 2021.


Valentina Knight # 1228728
4370 Smiley rd (FM, WCC)
Las Vegas, NV 89115