

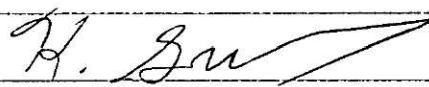
Keith Sullivan #92630 case NO: 85109 COA
SDCC
PO Box 208
Indian Springs, NV 89018

clerk of the court,

3/6/23

Please include these documents with the "Reply to the Respondent's Answering Brief" filed 2/23/23. Because I wasn't able to copy these documents due to SDCC's law library scheduling policy until Mon. 3/6/23, I wasn't able to include them in a simultaneous way.

Thank you,

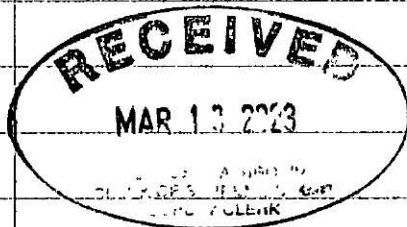
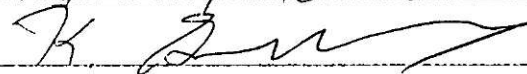


Keith Sullivan #92630

Petitioner, In Proper Person

The "Motion to Admit a second Petition for writ of Habeas corpus" directly opposes the Respondent's assertion that I didn't ~~submit~~ apply for permission to file a second Petition in a timely manner. I filed that motion once the NDOC's law libraries were available to inmate access and was informed to do so by inmate law library assistants.

Please send me a file-stamped copy included within



23-07807

FILED

AUG 30 2022

Keith Sullivan ID NO. 92630

SOUTHERN DESERT CORRECTIONAL CTN.
20825 COLD CREEK RD.
P.O. BOX 208
INDIAN SPRINGS, NV 89070

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

NEVADA SUPREME
~~IN THE SECOND JUDICIAL DISTRICT COURT~~
~~IN THE COURT OF WASHINGTON STATE~~
OF NEVADA and the 2nd JUDICIAL DISTRICT COURT.

Keith Sullivan }
petitioner }
v. }
Perry Russell, warden, et al }
Respondents }

CASE NO.: CR18-0427
DEPT. NO.: Eight
DOCKET: _____

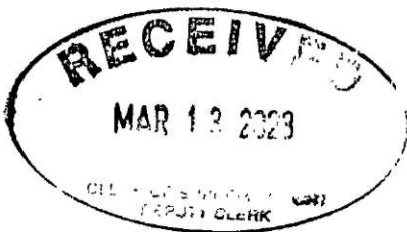
Motion to Admit Second Petition for Writ of Habeas
Corpus

COMES NOW, Keith Sullivan Petitioner IN PRO SE, herein above respectfully
moves this Honorable Court for an admission of a second petition for
Writ of Habeas Corpus

This Motion is made and based upon the accompanying Memorandum of Points and
Authorities,

DATED this 22nd day of AUGUST, 2022

BY: [Signature]
Keith Sullivan # 92630
Defendant In Proper Personam



22-27172

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CERTIFICATE OF SERVICE BY MAILING

I, Keith Sullivan, hereby certify, pursuant to NRCP 5(b), that on this _____ day of August, 2022, I mailed a true and correct copy of the foregoing, "MOTION to Admit second Petition for writ of Habeas Corpus" by placing document in a sealed pre-postage paid envelope and deposited said envelope in the United State Mail addressed to the following:

2nd Judicial Dist. Court
75 Court St.
Reno, NV 8950

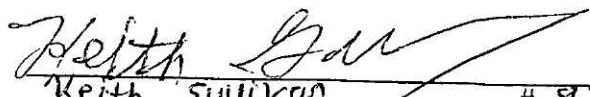
Nevada Atty Gen office
100 N. Carson St
Carson City, NV 89702

Washoe Co. Dist. Atty.
one S. Sierra St.
Reno, NV 89501

Nevada Supreme Court
201 S. Carson St., Suite 201
Carson City, NV 89702

CC:FILE

DATED: this 22nd day of August, 2022.


Keith Sullivan # 92630
/In Propria Personam
Post Office Box 208, S.D.C.C.
Indian Springs, Nevada 89018
IN FORMA PAUPERIS:



**State of Nevada
Department of Corrections**

INMATE GRIEVANCE REPORT

ISSUE ID# 20063147955

ISSUE DATE: 01/13/2023

INMATE NAME		NDOC ID	TRANSACTION TYPE	ASSIGNED TO	
SULLIVAN, KEITH WILLIAM		92630	RTRN INF	GMORAN	
LEVEL	TRANSACTION DATE	DAYS LEFT	FINDING	USER ID	STATUS
IF	01/24/2023	4	Partially Granted	KCURRIER	INACTIVE

INMATE COMPLAINT

OFFICIAL RESPONSE

Offender Sullivan, K #92630, I am in response to informal grievance log#20063147954 alleging that due to being separated from your property, you missed a deadline with the courts to file an appeal. While investigating your claim, I was able to confirm that you were originally being transferred on April 28, 2022 from Warm Springs Correctional Center with four (4) boxes. I cannot confirm or speak on the contents of the boxes. However, I was also able to confirm that due to not having enough space on the transportation vehicle, you were reduced to one (1) box and the rest were held back to be on the next transportation run. As a result of being in a restrictive housing unit from April 28, 2022 to May 11, 2022, you were not able to attend law library appointments. However, the law library provides legal services in restrictive housing units.

Partially Granted

GRIEVANCE RESPONDER

Report Name NVRIGR
Reference Name NOTIS-RPT-OR-0217.4
Run Date JAN-24-23 04:53 PM

Log Number 200003147954

NEVADA DEPARTMENT OF CORRECTIONS
INFORMAL GRIEVANCE

NAME Keith Sullivan I.D NUMBER 92630

INSTITUTION SDCC UNIT 5

GRIEVANT'S STATEMENT. ON April 28th 2022 I was transferred from
Warm Springs Correctional Ctr. to Southern Desert Correctional Ctr
When we were being loaded onto the bus Sgt. Brady informed us
that there wasn't enough room to include all of our legal work boxes.
He said our boxes would follow us in a few days, But after a week

SWORN DECLARATION UNDER PENALTY OF PERJURY

INMATE SIGNATURE: Keith Sullivan DATE: 1/13/23 TIME: 9 PM

GRIEVANCE COORDINATOR SIGNATURE: Lawrence DATE: 1/20/23 TIME: 1300

GRIEVANCE RESPONSE: Response Attached

CASEWORKER SIGNATURE: [Signature] DATE: 3/3/23

Denial
GRIEVANCE UPHELD GRIEVANCE DENIED ISSUE NOT GRIEVABLE PER AR 740

GRIEVANCE COORDINATOR APPROVAL: Lawrence DATE: 1/24/2023

INMATE AGREES INMATE DISAGREES

INMATE SIGNATURE: Keith Sullivan DATE: 3/3/23

FAILURE TO SIGN CONSTITUTES ABANDONMENT OF THE CLAIM. A FIRST LEVEL GRIEVANCE MAY BE PURSUED IN THE EVENT THE INMATE DISAGREES

- Original To inmate when complete, or attached to formal grievance
- Canary To Grievance Coordinator
- Pink Inmate's receipt when formal grievance filed
- Gold Inmate's initial receipt

Received
SDCC
JAN 19 2023
AWP

NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM

NAME Keith Sullivan ID NUMBER 92630

INSTITUTION SDCC UNIT # 5

GRIEVANCE # _____ GRIEVANCE LEVEL Informal

GRIEVANT'S STATEMENT CONTINUATION. PG two OF three

passed and I still didn't have them I filed an Emergency
Grievance. It was denied, deemed not an emergency. I then filed
an Informal Grievance. I didn't receive my legal work boxes
until May 24th (approximately). I'd been ordered to amend
my Habeas corpus in order to supplement my opposition to the
State's motion to dismiss it by May 17th, 2022, ~~the motion~~
by Eighth Judicial District Court Judge, Hon. B. Bresku.

Because I was separated from my legal papers by the
Nevada Dept. of Corrections through no fault of my own, I
missed Judge Bresku's deadline.

I filed many Grievances at various levels and was
confused and stymied by their responses. Eventually, in
mid-December, 2022, I met with AWP, Currier in her
office at SDCC. She explained my errors in some of the
latter grievances I'd filed but said she'd investigate
my claims. Today I spoke with her and she advised

Original: Attached to Grievance
Pink: Inmate's Copy

Received
SDCC

11/19/22
AWP

NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM

NAME Keith Sullivan ID NUMBER 92630

INSTITUTION SDCC UNIT # 5

GRIEVANCE #: _____ GRIEVANCE LEVEL Informal

GRIEVANT'S STATEMENT CONTINUATION PG three OF three

to file this grievance.

The problem is that I missed a court-ordered deadline because I'd been separated from my legal work for ~~the~~ three and a half weeks during which the deadline elapsed.

The remedy I am seeking is a simple acknowledgment that what I have stated is true and accurate so that I can prove that my missing the deadline was due to circumstances beyond my control. Please state unequivocally that I was transferred from W.S.C.C. to SDCC on April 28th, 2022 but did not receive my legal boxes until May 24th, 2022 and that I was unable to utilize the law library due to its closure because of COVID at the time and also because I was housed in Unit 6 which is a segregated housing unit. It was impossible to notify the court and the respondents in my appeal due to these circumstances. Thank you.

Original
Pink:

Attached to Grievance
Inmate's Copy

Received
SDCC

JAN 17 2023

AWED



State of Nevada
Department of Corrections

INMATE GRIEVANCE REPORT

ISSUE ID# 20063147955

ISSUE DATE: 01/13/2023

INMATE NAME		NDOC ID	TRANSACTION TYPE	ASSIGNED TO
SULLIVAN, KEITH WILLIAM		92630	RTRN INF	GMORAN
LEVEL	TRANSACTION DATE	DAYS LEFT	FINDING	USER ID
IF	01/24/2023	4	Partially Granted	KCURRIER
INMATE COMPLAINT				STATUS
				INACTIVE

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Partially Granted

GRIEVANCE RESPONDER

Report Name: MVRIGR
Reference Name: NOTIS-RPT-OP-02174
Run Date: JAN-24-23 04.53 PM

RECEIVED
MAR 13 2023
ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

Log Number 200003147954

NEVADA DEPARTMENT OF CORRECTIONS
INFORMAL GRIEVANCE

NAME Keith Sullivan I.D NUMBER 92630

INSTITUTION SDCC UNIT 5

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He said our boxes would follow us in a few days, But after a week

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GRIEVANCE COORDINATOR SIGNATURE: [Signature] DATE: 1/20/23 TIME: 1300

GRIEVANCE RESPONSE: Response Attached

CASEWORKER SIGNATURE: [Signature] DATE: 3/3/23

Penttila

GRIEVANCE UPHELD GRIEVANCE DENIED ISSUE NOT GRIEVABLE PER AR 740

GRIEVANCE COORDINATOR APPROVAL [Signature] DATE: 1/24/2023

INMATE AGREES INMATE DISAGREES

INMATE SIGNATURE: Keith Sullivan DATE: 3/3/23

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- Pink Inmate's receipt when formal grievance filed
- Gold Inmate's initial receipt

RECEIVED
SDCC
JAN 19 2023
AWP

NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM

NAME Keith Sullivan ID NUMBER 92650
INSTITUTION SDCC UNIT # 5
GRIEVANCE # _____ GRIEVANCE LEVEL: Informal

GRIEVANT'S STATEMENT CONTINUATION. PG. two OF three

passed and I still didn't have them I filed an Emergency
Grievance, It was denied, deemed not an emergency, I then filed
an Informal Grievance. I didn't receive my legal work boxes
until May 24th (approximately). I'd been ordered to amend
my Habeas Corpus in order to supplement my opposition to the
State's motion to dismiss it by May 17th, 2022, ~~THE~~
by Eighth Judicial District Court Judge, Hon. B. Breslow.

Because I was separated from my legal papers by the
Nevada Dept. of Corrections through no fault of my own, I
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I filed many Grievances at various levels and was
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my claims. Today I spoke with her and she advised

Original: Attached to Grievance
Pink: Inmate's Copy

Received
SDCC

AWP

NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM

NAME Keith Sullivan ID NUMBER 92630
INSTITUTION SDCC UNIT # 5
GRIEVANCE # _____ GRIEVANCE LEVEL Informal
GRIEVANT'S STATEMENT CONTINUATION PG three OF three

to file this grievance.

The problem is that I missed a court-ordered deadline because I'd been separated from my legal work for ~~the~~ three and a half weeks during which the deadline elapsed.

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Original. Attached to Grievance
Pink: Inmate's Copy

Received
SDCC

JAN 14 2023

AWED

FILED

AUG 30 2022

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

Keith Sullivan ID NO. 92630

SOUTHERN DESERT CORRECTIONAL CTN.
20825 COLD CREEK RD.
P.O. BOX 208
INDIAN SPRINGS, NV 89070

NEVADA SUPREME
~~IN THE SUPREME COURT~~
~~IN THE COURT OF APPEALS~~
~~IN THE COUNTY OF WASHINGTON STATE~~
OF NEVADA and the 2nd JUDICIAL DIST. COURT.

Keith Sullivan
Petitioner

v

Perry Russell, warden, et al
Respondents

CASE NO.: CR18-0427

DEPT. NO.: Eight

DOCKET: _____

Motion to Admit Second Petition for writ of Habeas
Corpus

COMES NOW, Keith Sullivan Petitioner IN PROSE, herein above respectfully
moves this Honorable Court for an admission of a second petition for
writ of Habeas Corpus

This Motion is made and based upon the accompanying Memorandum of Points and
Authorities,

DATED this 22nd day of AUGUST, 2022

BY: *[Signature]*
Keith Sullivan # 92630
Defendant In Proper Personam

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CERTIFICATE OF SERVICE BY MAILING

I, Keith Sullivan, hereby certify, pursuant to NRCp 5(b), that on this
day of August, 2022, I mailed a true and correct copy of the foregoing, "Motion to
Admit Second Petition for writ of Habeas Corpus"
by placing document in a sealed pre-postage paid envelope and deposited said envelope in the
United State Mail addressed to the following:

2nd Judicial Dist. Court
75 Court St.
Reno, NV 8950


Nevada Atty Gen office
100 N. Carson St
Carson City, NV 89702

Washoe Co. Dist. Atty.
One S. Sierra St.
Reno, NV 89501

Nevada Supreme Court
201 S. Carson St., Suite 201
Carson City, NV 89702

CC:FILE

DATED: this 22nd day of August, 2022.


Keith Sullivan # 92630
/In Propria Personam
Post Office Box 208, S.D.C.C.
Indian Springs, Nevada 89018
IN FORMA PAUPERIS:

CERTIFICATE OF SERVICE

I, Keith Sullivan, hereby certify that I am the
Petitioner in this matter and I am representing myself *in propria persona*.

On this 7th day of March, 2023, I served copies of
the documents supporting statements

in Case No. 85109EOA, and placed said document(s) in the United States
Mail, first-class postage prepaid, addressed as follows:

Nevada Supreme Court
100 S. Carson St., Suite 201
Carson City, NV 89701-4702

Nevada Atty Gen. Office
100 N. Carson St.
Carson City, NV 89701-4717

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he is the Petitioner in the
above-entitled action, and he has read this Certificate of Service and the information
contained therein is true and correct.

Executed pursuant to 28 U.S.C. § 1746 and 18 U.S.C. § 1621 at
SDCC on this 7th day of
March, 2023.



NDOC No. 92630

Petitioner – *In Propria Persona*