

IN THE SUPREME COURT OF THE STATE OF NEVADA

FILED

MATTHEW TRAVIS HOUSTON,  
Appellant,  
vs.

No.(s): 79408

84885 FEB 10 2023

THE STATE OF NEVADA, ET AL,

85351

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

MANDALAY BAY CORP., ET AL,

No.(s): 80562

80562 -> COA

84417

84418

84477

84887

85352

THE STATE OF NEVADA, ET AL,

No.(s): 84281

84478

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BRIAN P. CLARK, ET AL,  
Respondent(s).

85354

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Appellant's Opening Brief And  
Renewed Request For Transcripts As A  
Motion For Extension of Time And  
Continued Motion For Reinstatement of All Briefing  
Schedules In All Cases of Matthew Travis Houston,

Bar Association Member No. 04662784 - Part III

RECEIVED  
FEB 09 2023  
The Court  
ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
DEPUTY CLERK

The Court will now take notice of the renewed interpleadings:

## STATEMENT OF FACTS:

1  
2 On July 14, 2021, MATTHEW TRAVIS HOUSTON (hereinafter "Petitioner-Appellant")  
3 was abducted from his hotel room at the Best Western located at or near 3041  
4 St. Rose Parkway in Henderson, Nevada, as he was not served with any sort of  
5 summons or WARRANT nor was told or read that he had any kind of rights. This  
6 false arrest prevented Petitioner-Appellant from attending his appointment the very  
7 next day at Nevada Retina Specialists, with Dr. Tyson Ward on July 15, 2021, while  
8 his continued imprisonment of his person also prevented him from attending his medical  
9 disability rating in Reno, Nevada, on August 15, 2021, with Dr. Dwagleri. Both appointments  
10 of which had been scheduled by the abductors, SEDAWICK's Dianne Ferrante, and her  
11 alleged supervisor, Rosemarie McMorris-Alexander, as was the booking of his room.

12 The Petitioner-Appellant's attempt at release from CDC was intended so that he could  
13 search for, and hopefully, retrieve his service animals. However, the now-dismissed counsel,  
14 Benard Little, provided misinformation regarding the lack of a directly related "City Jail  
15 Detainer Hold". Counsel had told Petitioner-Appellant, all the while coercing his client into a  
16 potential release from custody, that he "did not see a detainer hold" - when, in fact, there was.  
17 This coercion of the client by his previous representation created a second double-jeopardy  
18 in LAS VEGAS MUNICIPAL COURT #1248374A + #C1237802A; with the first being  
19 EIGHTH JUDICIAL DISTRICT COURT Z1-CR-019840 + Z1-CR-033713.

20 These traumatic events are a cruel and unusual punishment being inflicted upon an  
21 innocent man, who was forced into an involuntary relocation, with unnecessary hardships  
22 causing the eviction of his law office located at 435 South Linn Street #927, in Iowa  
23 City, Iowa (52240), \$36.5 million of property damage and the destruction of his K-9(s).

24 Due to crimes both civil and criminal, not to mention the willful omissions of Rosemarie  
25 McMorris-Alexander and Dianne Ferrante, SEDAWICK and the prosecutions' most unlawful use  
26 of overreaching tactics ~~in~~ their exploitation of the innocent man has put the Petitioner-Appellant  
27 into an unmanageable state of duress, homelessness, and extensive incarceration.

28 ///

MAY 10 2022

SUPPLEMENTAL PETITION TO NO. 84281  
IN THE SUPREME COURT OF THE STATE OF NEVADA  
TO REVIEW THE NEVADA COURT OF APPEALS DECISION(S)

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY \_\_\_\_\_  
DEPUTY CLERK

MATTHEW TRAVIS HOUSTON  
Appellant,  
  
vs. STATE OF NEVADA, ET AL,  
MANDALAY BAY CORP., ET AL  
Respondents also include Rosemary  
McMorris - Alexander and SEOGVICK, et al.

Supreme Court No. 84477  
"84478" and "84281"  
District Court No. A758861  
C 357927

JOINDER OF APPEAL AND APPELLANT'S INFORMAL BRIEF, COUNTERCLAIM AND

EMERGENCY MOT. IN RE DECISION OF NO. 84281 FILED 4/5/22.

**INSTRUCTIONS:** If you are an appellant proceeding pro se (without an attorney) in the Nevada Supreme Court, you must file either (1) a brief that complies with Nevada Rule of Appellate Procedure (NRAP) 28(a), or (2) a completed copy of this informal brief form, see NRAP 28(k), with the Nevada Supreme Court on or before the due date, see NRAP 31. In civil appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court may dismiss your appeal. In postconviction criminal appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court or Nevada Court of Appeals may decide your appeal on the record without briefing.

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**HOW TO FILL OUT THIS FORM:** This form must be typed, unless you are incarcerated, in which case it must be clearly handwritten. You do not need to refer to legal authority or the district court record. If you are completing your brief on this form, write only in the space allowed on the form. **Additional pages and attachments are not allowed.** If typing an informal brief, you may either use the lined paper contained in this form or an equivalent number of pages of your own paper. Your brief will be stricken if you fail to follow the directions in this form and the Nevada Rules of Appellate Procedure.

**WHERE TO FILE THE BRIEF:** You may submit your brief for filing in person or by mail.

**To file your brief in person:** Briefs may be submitted for filing Monday through Friday, 8:00 a.m. to 4:00 p.m.

**Carson City:** Bring the brief to the Clerk's Office at the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada, 89701.

**Las Vegas:** Place your brief in the Clerk's Office Drop Box at the Las Vegas Courthouse for the Nevada Appellate Courts, 408 East Clark Street, Las Vegas, Nevada, 89101.

Informal Brief Form, October 2017

C-1

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3



ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
DEPUTY CLERK

To file your brief by mail: Mail the brief to the Clerk of the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada 89701. **Your brief must be postmarked on or before the due date.**

You must file the original brief and 1 copy with the clerk of the Nevada Supreme Court. If you want the clerk to return a file-stamped copy of your brief, you must file the original form and 2 copies and include a self-addressed, stamped envelope. Documents cannot be faxed or emailed to the Supreme Court Clerk's Office.

Copies of the brief must be mailed or delivered to the other parties to this appeal or to the parties' attorneys, if they have attorneys. You must also include a proper certificate of service or complete the certificate that is attached to the informal brief form.

CAUTION: Pro se parties are prohibited from representing other parties. A pro se party may not complete a brief on behalf of other parties. Pro se parties may collaborate on their briefs, however, provided that if one brief is submitted on behalf of multiple pro se parties, each party must sign and date the brief to confirm that he or she has participated in the preparation of the brief and, by his or her signature, joins in the arguments and representations contained therein.

YOU WILL NOW TAKE NOTICE that this is not to be a "MIXED PETITION" as this counterclaim is result of interpleadings and his person in fact being the true VICTIM OF CRIME. By "his" we are referring to the Appellant whom is a survivor of the terrible ONE OCTOBER. He is also indigent and completely unable to serve any sort of "copies" of his pleadings due not only to the fact that they can look up all of this online, but by the fact that Radenta Blacic and Rosemary McMornis-Alexander are involved in an insurance scam to have the Appellant continuously wrongfully convicted, falsely imprisoned, illegally incarcerated and possibly murdered by prison gangs or worse.

**Judgment or Order You Are Appealing.** List the judgment or order that you are appealing from and the date that the judgment or order was filed in the district court.

Filed Date	Name of Judgment or Order
April 5th, 2022	ORDER DENYING REHEARING
	and everything else too.

**Notice of Appeal.** Give the date you filed your notice of appeal in the district court: December 27th, 2021

**Related Cases.** List all other court cases related to this case. Provide the case number, title of the case and name of the court where the case was filed.

Case No.	Case Title	Name of Court
C-17-323644	HOUSTON V. NEVADA	EIGHTH JUDICIAL
C-21-357927-1	HOUSTON V. NEVADA	CLARK COUNTY
A-17-758861-C	HOUSTON V. MANDALAY BAY, et al	CLARK COUNTY

**Pro Bono Counsel.** Would you be interested in having pro bono counsel assigned to represent you in this appeal?

Yes       No

**NOTE:** If the court determines that your case may be appropriate for having pro bono counsel assigned, an appropriate order will be entered. Assignment of pro bono counsel is not automatic.

**Statement of Facts.** Explain the facts of your case. (Your answer must be provided in the space allowed.)

Originalist jurisprudence should not be sterile or purely mechanical. It's understanding would be more rich, and its rules more durable, if it was informed by any sort of experience. In the case of A-17-758861-C both the EIGHTH JUDICIAL DISTRICT COURT and the SUPREME COURT OF NEVADA have contributed to damaging the Appellant by repeatedly violating NRS 11.207 by ignoring many other laws not limited to the quite significant

~~the~~ valid tolling of the statute of limitations.  
Keep in mind that an<sup>#1</sup> action against an attorney to recover damages for malpractice, whether based on a breach of contract or duty, must be commenced within 4 years after the plaintiff sustains damage or within 2 years after the plaintiff discovers or through the use of reasonable diligence should have discovered the material facts which constitute the cause of action, whichever occurs earlier.<sup>#2</sup> The time limitation is tolled for any period during which the attorney conceals any act, error or omission upon which the action is founded and which is known or the use of reasonable diligence should have been known to the attorney. In this case, to which the attorneys for the respondents and the interpleaded defendants have ruined the life of the Appellant again, by acting in coercion with Sedgwick, Dianne Ferrante, Jonathan Shockley, Rosemary McMorris - Alexander and no less than 40 other accomplices to wrongfully convict the Appellant <sup>causing</sup> ~~have~~ a 2nd false imprisonment. The initial intentional gross negligence and deliberate indifference of interpleaded defendants / respondents resulted in case C-17-323614-1 against the Appellant, and now this C-21-357927-1.

Pursuant to NAAP, in C-21-357927-1, the Appellant filed his DIRECT APPEAL from fish tank with little to no resources just after Dec. 20th, 2021 as both

Bernard <sup>#12025</sup> Little and Anthony M. Goldstein were to have been withdrawn as attorney of record. The Appellant also filed a pro se "EMERGENCY MOTION REQUESTING HEARING, DE NOVO, AND RELEASE TO INTENSIVE SUPERVISION" which was stamped "RECEIVED DEC 27, 2021 CLERK OF COURT" but mistakenly forwarded to the office of Anthony M. Goldstein when it should have sufficed as a "NOTICE OF APPEAL". The Appellant did not ~~not~~ intend to have appointed counsel from the onset of this case, to which there was no valid warrant as it was unsigned, there was no probable cause for the false arrest of the Appellant, and this case in its entirety is based on the false police reports and lies of Rosemary McMorris - Alexander and Radenta Blacic.

**Statement of District Court Error.** Explain why you believe the district court was wrong. Also state what action you want the Nevada Supreme Court to take. (Your answer must be provided in the space allowed.)

The question presented is one of first impression and of general statewide significance because pursuant to the law of the land, wrongful convictions and false imprisonment are in fact illegal. As is the malicious prosecution of Rosemary McMorris - Alexander, et al. The question presented to the Eighth Judicial District Court ("is Houston guilty?") which is in fact NO was not even allowed to be presented to the courts because of the coercion between way too many bad actors not limited to Brian P. Clark, Scott Poisson, Tierra Danielle Jones, David M. Jones, Laura A Goodman #013390, Jack Bernstein, Scott Poisson #10188, Radenta Blacic, Christopher Burk, Jessica Flores,

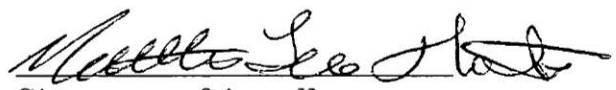
Dianne Ferrante, Jonathon Shackley, L.V.M.P.D, Las Vegas City Jail, HDSP, TLVCC, SDCC, Erica Tosch, Jason Barrus, the Attorney General Aaron Ford, Sheriff Joe Lombardo, MGM, Mandalay Bay Resort and Casino Convention Center, UMC, Encore Event Services, PSAV, FREEMAN, IATSE #720, the Nevada Gaming Commission, Division of Industrial Relations, Clark County District Attorneys Steven Wolfson, et al. #001565  
GGRM's Lisa Anderson, Ellie Rookhani, Michael P. Villani, Mary K. Holthus, Melissa De La Garza, Andrew Flahive, Alex Bassett, Gene Porten, Kristina A. Rhoades #12480, Anthony M. Goldstein, Dan Schwartz, Karen Schwartz (GENEX), Cassandra Diez, Jeremy Wood, Lina Sakabauskas, Rody Scott, Lukas McCowit, Nicole Garcia, Tyler Ure, David Kelly #7413, F. Edge #8645, Montero #C6056  
Again, this first impression was made by the clerk of court of the Regional Injustice Center when they certified the Appellant's request for de novo on December 27th, 2021, which was well before the 30 day time limit from December 8th, 2021 for the Appellant to file a pro se "notice of appeal". It is in no way the fault of the Appellant that the courts are backed up, it was in no way the fault of the Appellant that riots in the prison system and at CCDC caused the Appellant's mental state to make him suffer into incompetency and it was no way the fault of the Appellant that his "request for a de novo hearing" was not interpreted properly to the court as a "notice of appeal". Furthermore, it is in no way the fault of the appellant that Rosemary McMorris-Alexander is a liar.



The decision made by the Nevada Court of Appeals on April 5th, 2022 conflicted with the United States Supreme Court because pursuant to the Constitution of the United States, citizens are to be free and clear from any sort of cruel and unusual punishment. For going off 6 years now, all the courts of Nevada have been doing to the Appellant is punishing him for being a pro se litigant. This discrimination is in fact illegal and in a few more jurisdictions than the Kangaroo court of Clark County. It is hereby again demanded by the Appellant that each and every judge on the bench now take notice of the motion filed for a 2nd time electronically by the Clerk of Court of the Regional Injustice Center on April 6th, 2022 and is to be heard by District Court again on April 27th, 2022. Again, this notice of appeal was originally filed December 27, 2021. A notice of appeal is the same thing as asking the courts for a de novo hearing, and a technicality should not be the cause of extensive incarceration, false imprisonment, wrongful conviction or otherwise. This court is NOT to overlook any miscarriage of justice and it is NOT to overlook the initiative of the injured worker, or, in this case - the permanently totally disabled worker. In this case, unfortunately to the People of the State of Nevada, and all the other cases of Matthew Travis Houston, these courts and their bad actors have intentionally, deliberately and indifferently been overlooking justice and what it means, constituting an abuse of process and creating more unnecessary hardships within decision making.

This case involves fundamental issues of statewide public importance because nobody, permanently totally disabled or not, should be arrested without a valid warrant as the result of surviving a catastrophic work accident. This is absolutely a fundamental issue of statewide public importance because how many citizens of Nevada work in the convention and entertainment industry? How many of those citizens thrive in a safe and secure work environment? How many of those citizens think it's okay for an insurance company to lie to the courts and illegally withhold the injured worker's rightfully entitled benefits? How many people in the State of Nevada think that it's okay for the courts and the State Bar of Nevada to discriminate against pro se litigants and steal their service animals?

DATED this 20th day of April, 2022.



Signature of Appellant

Matthew Travis Houston  
Print Name of Appellant

**CERTIFICATE OF SERVICE**

I certify that on the date indicated below, I served a copy of this completed informal brief form upon all parties to the appeal as follows:

- By personally serving it upon him/her; or
- By mailing it by first-class mail with sufficient postage prepaid to the following address(es) (list names and address(es) of parties served):

The Supreme Court of Nevada  
and its fictitious "Court of Appeals"

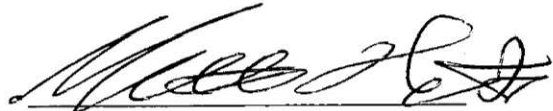
201 South Carson St, Ste 201  
Carson City, NV 89701

RJC @  
200 Lewis Ave.  
LV, NV-89155

CLARK MCCOURT, LLC  
7371 Prairie Falcon Rd, #120  
LV, NV 89128

AARON D. FORD  
555 E. Washington Ave.  
#3900  
LV, NV-89101

DATED this 20 day of April, 2022.



Signature of Appellant

Matthew Travis Houston

Print Name of Appellant

No. 1210652 @ H.O.S.P.

P.O. Box 650

Address

Indian Springs, NV 89070-

City/State/Zip 0650

Telephone