

IN THE SUPREME COURT OF THE STATE OF NEVADA

See Case 2:22-cv-01607-APG-CSD Document 30 Filed 03/13/23 Page 1 of 2

See Case 2:22-cv-01285 Document 1-1 Filed 08/11/22 Page 1 of 9 and Document 7

NOCC No. 1210652 in HELL "aka" death-row S.M.U. @ U.S. Navy (Ret. June 6th, 2002) D.E.P. 1-04-08
AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

RECEIVED
SERVED ON
COUNSEL PARTIES OF RECORD
MAR 13 2023
FILED
MAR 22 2023
ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

MULTIJURISDICTIONAL LITIGATION FROM THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA - Las Vegas AND MULTIDISTRICT LITIGATION

Matthew Travis Houston
Petitioner-Plaintiff-Appellant
v. The State of Nevada,
William Jake Merback, Kristina A. Rhoades,
Joseph M. Lombardo, John T. Jones, Jr.,
"Acting Warden" Jeremy Bean,
Calvin Johnson, et al
Defendant(s) - Respondent(s) Brian P. Clark
(name of warden or authorized person having custody of petitioner)

SEE
CASE No. 2:23-cv-00031-REB
No. 84886 AND No. 85747

See Case No. 2:22-01607 and also
Case No. 2:22-cv-01285-MMD-VCF

MOTION FOR ENLARGEMENT OF TIME
TO FILE A CONTINUED RESPONSE,

RENEWED EMERGENCY SUPPLEMENT AND EX PARTE MOTION FOR RECONSIDERATION
AS A RENEWED PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241, MERITORIOUS
INTERPLEADINGS AND JOINDER OF APPEAL IN ALL CASES OF THE PETITIONER - PLAINTIFF -
APPELLANT

Plaintiff moves for an enlargement of time to file, due to no access to
1. (a) Your full name: Matthew Travis Houston the NDSPLaw Library;

(b) Other names you have used: n/a
2. Place of confinement:
(a) Name of institution: High Desert State Prison
(b) Address: 22010 Cold Creek Road PO Box 650
Indian Springs, NV 89070 - 0650
(c) Your identification number: 1210652

3. Are you currently being held on orders by:
 Federal authorities State authorities Other - explain: conspiracy of
Rosemarie McMorris-Alexander, et al (SEE ATTACHED) and
4. Are you currently: also 2:21-cv-00499-JAD-DJA for the record.

A pretrial detainee (waiting for trial on criminal charges)
 Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
If you are currently serving a sentence, provide:
(a) Name and location of court that sentenced you: Eighth Judicial District
Court of Clark County and Las Vegas Municipal Court, NV
(b) Docket number of criminal case: C-21-357927-1
(c) Date of sentencing: December 6th, December 8th, 2021

Being held on an immigration charge
 Other (explain): Matthew Travis Houston (Petitioner) has
suffered indefinite retaliation and irreparable harm having
been victim of C-17-32364-1 and Plaintiff in A-17-758861-C, and
numerous other litigation in jurisdictions not limited to the
EIGHTH JUDICIAL DISTRICT COURT, the JUSTICE COURT-LAS VEGAS
COURT OF THE STATE OF NEVADA in being victim of
the LAS VEGAS MUNICIPAL COURT and the SUPREME
COURT OF THE STATE OF NEVADA in being victim of
also arrests on September 20th, 2016, and July 14th, 2021. The following
STATEMENT OF FACTS show that Mr. Houston has exhausted all
of the remedies, especially because false arrest(s) are unconstitutional;

RECEIVED
MAR 27 2023
ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

23-08841 ①

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 [REDACTED] 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 this continued imprisonment of his person also prevented him from attending his medical
9 disability rating in Reno, Nevada, on August 15, 2021, with Dr. Gwagleri. 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 CCDC was intended so that he could
13 search for, and hopefully, retrieve his service animals. However, the now-dismissed counsel, J. Wood
14 and Bernard 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 #1248334A + #C1237802A; with the first being by Jeremy Wood,
19 in EIGHTH JUDICIAL DISTRICT COURT 21-CR-019840 + 21-CR-033713. Anthony M. Goldstein never visited
20 Mr. Houston. These traumatic events are a cruel and unusual punishment being inflicted upon an abused
21 and 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.

/// CONCLUSION:

29 WHEREFORE, the Petitioner-Appellant should be
30 expeditiously remanded to CCDC to prevent and end all
31 further miscarriage ^{of justice} / manifest injustice. x Matthew Travis Houston
DATED: March 05, 2023. Matthew Travis Houston (2)

RENEWED
CERTIFICATE OF SERVICE BY MAILING

28th

I, Matthew Travis Houston, hereby certify, pursuant to NRCP 5(b), that on this 10th
December, 2022, day of March, 2022, I mailed a true and correct copy of the foregoing, "Renewed and Amended

Complaint, (s) Application To Proceed In forma Pauperis(s)
and PETITION FOR A WRIT OF HABEAS CORPUS(S)

by depositing it in the High Desert State Prison, Legal Library, First-Class Postage, fully prepaid,
addressed as follows: AARON D. FORD #3900 CLARK McCURT, LLC
555 E. WASHINGTON AVE. #3900 7371 Prairie Falcon Rd
LAS VEGAS, NV 89101 Las Vegas, NV #120

Regional Injustice Center
Clerk of the Court
Stephen A. Gulesian
200 Lewis Ave., 3rd Floor
Las Vegas, NV
89155-1160

BERNSTEIN & POISSON
Christopher Burk, "Kylie"
Ryan Kerbow, Jack Bernstein
Scott Poisson, Nicole Garcia
Jessica Flores, Tyler Ure

L.B.B.S. Daniel Schwartz
2300 W. Sahara Avenue #900
Las Vegas, NV 89102

320 S. Jones Blvd.
Las Vegas, NV 89107

Lina Sakalauskas
Dan Schwartz (LBBS)
Nevada Attorney For
Injured Workers - NAIW
2200 Rancho
Las Vegas, NV

Jason Barrus
Erica Tosh
State Bar of Nevada
3100 W Charleston Blvd #100
Las Vegas, NV 89102

2:22-cv-00693-JAD-NJK (2:22-cv-01285-MMD-VCF)
CC:FILE 2:21-cv-00499-JAD-DJA
2:22-cv-01607-APG-NJK

DATED: this 10th day of March, 2022.

2:19-cv-01472-APG-DJA

2:19-cv-01371-JAD-DJA


2:22-cv-01285-MMD-VCF

2:22-cv-00693-JAD-NJK

2:19-cv-D1740-APG-BNW

2:19-cv-01475-GMN-EJY

2:19-cv-01360-RFB-VCF


Matthew Travis Houston #110652
Plaintiff-in-Eror /In Propria Personam
Post Office box 650 [HDSP]
Indian Springs, Nevada 89018
IN FORMA PAUPERIS:
ABA No. 04662784

SUPREME COURT OF NEVADA
201 S. Carson Street
N^o 201
Carson City, NV 89701

IN THE SUPREME COURT OF THE STATE OF NEVADA

REV.

1 MATTHEW TRAVIS HOUSTON, CHTD
Appellant/In Propria Persona
2 Post Office Box 650 (HDSP)
Indian Springs, Nevada. 89018
3 ABA No 04662784

4 MULTIJURISDICTIONAL LITIGATION FROM THE
EIGHTH JUDICIAL DISTRICT COURT OF
5 CLARK COUNTY, NEVADA
6 SEE EDDC No A-17-758861-C

7
8 MATTHEW TRAVIS HOUSTON }
Appellant }
9
10 vs. THE STATE OF NEVADA, }
11 BRIAN P. CLARK dba CLARK }
MCCOY, LLC, Respondent(s) }

Case No. 84886

AND

Case No. 85747

13
14 MOTION TO APPOINT COUNSEL

"Hearing Requested"

15 DATE OF HEARING: _____

16 TIME OF HEARING: _____

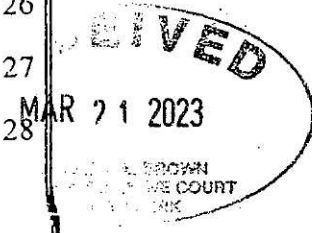
17
18 COMES NOW the Appellant, Matthew Travis Houston in proper persona and moves
19 this court for an Order granting him counsel in the proceeding action.

20 This motion is made and based upon all papers and pleadings on file herein and attached
21 points and authorities.

22
23 Dated this 15 day of March, 2023.

24
25 Respectfully Submitted,

26 Matthew Travis Houston
MATTHEW TRAVIS HOUSTON, CHTD
27 ABA No 04662784



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

POINTS AND AUTHORITIES

NRS 34.750 Appointment of Counsel for indigents; pleading supplemental to petition; response to dismiss.

“If the Court is satisfied that the allegation of indigency is true and the petition is not dismissed summarily, the Court may appoint counsel to represent the petitioner.”

NRS 171.188 Procedure for appointment of attorney for indigent defendant.

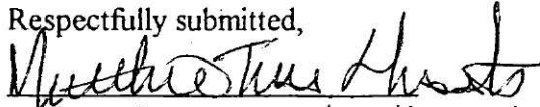
“Any defendant charged with a public offense who is an indigent may, be oral statement to the District Judge, justice of peace, municipal judge or master, request the appointment of an attorney to represent him.”

NRS 178.397 Assignment of counsel.

“Every defendant accused of a gross misdemeanor or felony who is financially unable to obtain counsel is entitled to have counsel assigned to represent him at every stage of the proceedings from his initial appearance before a magistrate or the court through appeal, unless he waives such appointment.”

WHEREFORE, petitioner prays the Court will grant his motion for appointment of counsel to allow him the assistance that is needed to insure that justice is served.

Dated this 15 day of March, 2023

Respectfully submitted,

REV. MATTHEW TRAVIS HOUSTON,
ABA No 04662784 CHTP