

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

MATTHEW TRAVIS HOUSTON,  
Plaintiff / Plaintiff-in-Error /  
Petitioner - Appellant

VS.

THE STATE OF NEVADA  
BRIAN P. CLARK  
JOSEPH M. LOMBARDO ET AL  
MANDALAY BAY CORPORATION ET AL  
CALVIN JOHNSON ET AL  
DANIEL L. SCHWARTZ  
BERNSTEIN & POISSON ET AL  
Defendant(s)-Respondant(s)  
Appellee(s).

FILED

AUG 10 2023

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

Case No.(s) 84886-COA  
85747-COA  
86624  
86764-COA  
86972  
87003  
87005

RENENEWED PETITION TO REINSTATE ALL BRIEFINGS OF APPELLANT;  
EMERGENCY MOTION TO APPOINT COUNSEL  
AND SUPPLIMENTAL RESPONSE TO THE  
FALSE CLAIMS OF JOHN T. AFSHAR ET AL IN EX PARTE  
"de novo hearing(s) requested"

Comes now the wrongfully convicted and actually innocent  
Appellant, Matthew Travis Houston, in proper  
persona moves this court for an Order granting him  
counsel in the proceeding actions, most especially as  
there have been numerous violations of ethics and  
laws including but not limited to NRAP 46A(b)(1) -  
"A defendant who is appealing from a JOC may NOT  
appear without counsel". PLEASE SEE ATTATCHMENTS:

RECEIVED  
AUG 10 2023  
ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
DEPUTY CLERK

23-25911

STATEMENT OF FACTS: Kidnapped from his home

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2. <sup>in Iowa City</sup> On July 14, 2021, MATTHEW TRAVIS HOUSTON (hereinafter <sup>"Plaintiff-in-Error"</sup> "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 CASC was intended so that he could  
13 search for, and hopefully, retrieve his service animals. However, the now-dismissed counsel, J.  
14 Wood & 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 #1248384A + #C1237802A; with the first being in Justice  
19. Court/EIGHTH JUDICIAL DISTRICT COURT 21-CR-019840 + 21-CR-033713. A. Goldstein <sup>AND LAW, PLLC</sup> 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. Not at any  
28. times/did Mr. Houston harass, threaten, extort, or "aggravated stalking" any of  
29. the parties in any of his cases; neither did he act aggressively towards  
30. any other individual, business or entity. Mr. Houston is a victim of crimes:  
- PAGE No. 2 OF 5 -



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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 29 day of July, 2023.

Respectfully submitted,

X. Matthew Travis Houston  
REV. MATTHEW TRAVIS HOUSTON,  
NOC #1210652- CHTD  
ABA ID No. 04662784

→ EMERGENCY LETTER OF MOTION TO THE CLERK(S)  
AND CERTIFICATE OF SERVICE IN EX PARTE—

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):

Could y'all PLEASE return  
to me a file stamped COPY of  
this meritorious interpleading so  
that I may "SERVE" my  
slave owners?

DATED this 29 day of JULY, 2023.

DO NOT  
FORGET → COPY  
OF THE  
ENVELOPE PER  
MAILBOX RULE



  
\_\_\_\_\_  
Signature of Appellant

  
\_\_\_\_\_  
Print Name of Appellant

  
\_\_\_\_\_  
Address

  
\_\_\_\_\_  
City/State/Zip

  
\_\_\_\_\_  
Telephone

1-800-666-HELL

— PAGE No. 5 AND LAST —