

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

FILED

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

AUG 10 2023

VS.

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

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).

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

RENEWED 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 INEX 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

23-25917

STATEMENT OF FACTS: Kidnapped from his home

1
2. ^{in Iowa City} On July 14, 2021, MATTHEW TRAVIS HOUSTON (hereinafter ^{"Plaintiff-in-Error"} "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. 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 CADC 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 #1248374A + #C1237802A; with the first being in Justice
19. COURT/EIGHTH JUDICIAL DISTRICT COURT 21-CR-019840 + 21-CR-033713. ^{AND LAW, PLLC} A. 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. Not at any
28. time 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 -

1
2 POINTS AND AUTHORITIES

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

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

7 NRS 171.188 Procedure for appointment of attorney for indigent defendant.

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

11 NRS 178.397 Assignment of counsel.

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

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

18
19 Dated this 29 day of July, 2023.

20
21 Respectfully submitted,

22 X. Matthew Travis Houston
23 REV. MATTHEW TRAVIS HOUSTON
24 NDOC #1210652- CHTD
25 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 —