

FILED

DEC 29 2023

AND ALSO SEE Case 2:22-cv-01740-JAD-EJY Document 21 Filed 04/24/23 Page 8 of 278

MATTHEW TRAVIS HOUSTON, Plaintiff-Appellant,  
v.  
DANIEL L. SCHWARTZ (not an individual) Defendants-Respondents.

Sup. Ct. Nev. No. 87003

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY *Mehana J. Jelle*  
DEPUTY CLERK

RESPONSE TO DOCKET 23-39492, DEMAND FOR REPAIRATIONS AND PETITION TO ESTABLISH FACTUAL INNOCENCE ~~RENEWED~~ LIST OF PARTIES AS AN OPENING BRIEF

"ORAL ARGUMENT REQUESTED"

1. Rosemarie McMorris-Alexander - SEDGWICK CMS
2. Redenta Blacic - STATE OF NEVADA (OMBUDSMAN) OFFICE OF CONSUMER HEALTH ASSISTANCE
3. Jonathan Shockley - SEDGWICK CMS
4. Brian P. Clark - CLARK MCCOURT, LLC
5. Daniell Schwartz - LEWIS, BRISBOIS, BISGAARD & SMITH, LLP
6. Karen Schwartz - GENEX D/B/A SEDGWICK CMS
7. Christopher D. Burk - BERNSTEIN & POISSON
8. Scott L. Poisson - SCOTT L. POISSON, ESQ <sup>Nevada Bar No. 10188</sup>
9. Kartie Gabour - BERNSTEIN & POISSON
10. Ryan M. Kerbow - BERNSTEIN & POISSON - Nevada Bar No. 11403
11. ~~Steven Paddock~~ BENJAMIN E. ABBOTT, ESQ Nevada Bar No. 15692
12. ~~M. Mulligan~~ <sup>LVMPD # 15657</sup> ~~Marylou Dennelly - Steven Paddock v. COSMOPOLITAN~~
13. Lina Sakalauskas - NEVADA ATTORNEY FOR INJURED WORKERS (NAIWI)
14. Dianne Ferrante - SEDGWICK CMS
15. ~~Las Vegas Fire and Rescue~~ J. Carroll - LVMPD #16715
16. Tierra Danielle Jones - EIGHTH JUDICIAL DISTRICT COURT (EJDC)
17. LVMPD Robert Jones No. 9920
18. David M. Jones - EJDC
19. Lisa Anderson - GGRM - witness "Ilyana" @ HEALTHSOUTH Law Firm
20. ~~HEALTH SOUTH~~ Benard H. Little, Nevada Bar No. 12025
21. ~~GGRM, Ilyana~~ Kristina A. Rhoades, Nevada Bar No. 12480
22. I.A.T.S.E. Local No. 720
23. ~~Fredman Companies~~ - OLD REPUBLIC INSURANCE COMPANY-P.S.A.V
24. ~~Encore Event Services~~ - ENCORE EVENT TECHNOLOGIES
25. ~~Poothammi~~ - EJDC - Haley Beza, Deputized Law Clerk
26. ~~Mary Kay Hottbas~~ - EJDC - Jennifer Togliatti

RECEIVED  
DEC 28 2023  
ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
DEPUTY CLERK

23-42255

LIST OF PARTIES (CONTINUED)

- 27. <sup>The Honorable</sup> Genet Porter (Ret.) - EJDC - D/B/A PRIVATE TRIALS, INC
- 28. Michael P. Villani - EJDC
- 29. <sup>Magistrate Melissa</sup> ~~Michelle~~ De La Garza - ~~EJDC~~ JUSTICE COURT, LAS VEGAS TOWNSHIP
- 30. ~~Susan Baccus~~ - ~~JENNIFER TOGLIATTI~~ - EJDC - Nancy Becker
- 31. Andrew Flahive - ANDREW SCOTT FLAHIVE, ESQ  
Flahive & Associates, Ltd.
- 32. Erica L. Tosh d/b/a Workers Comp Lawyers of Nevada
- 33. Jason W. Barrus d/b/a Law Office of Jason W. Barrus, Ltd.
- 34. Alex Bassett - ALEXANDER B. BASSETT - Clark County Public Defender "CB"
- 35. Joe Lombardo - SHERIFF, LVMPD
- 36. Clark County Detention Center - "aka" GGDC
- 37. Naphcare "aka" WELLPATH
- 38. LVMPD David Kelly No. 7413
- 39. LVMPD F. Edge No. 8645
- 40. Capitol Police Montero No. C6056
- 41. Cassandra Diez @ Clark County Public Defender "CCPD"
- 42. Darin F. Imlay @ Clark County Public Defender "CCPD"
- 43. ~~Bernard Little No. 12025~~ Jason Lewis @ Nevada Dept. of Administration - Hearings Division - Northern office
- 44. Jeremy B. Wood - CCPD
- 45. ~~Kayleigh Lopatic~~ - CCPD Nima Afshar Nevada Bar No. 14157
- 46. ~~Virginia F. Eichhacker~~ - CCPD W. Jake Merback, Clark County Deputy DA
- 47. ~~Jason Frierson~~ - CCPD Options Monitoring Program "SOP"
- 48. ~~██~~ LVMPD House Arrest Unit
- 49. ~~██~~ SCRAM "SMU"
- 50. ~~██~~ - A.L.A.
- 51. ~~██~~ - A.S.A.
- 52. Lillian R. McMorris

LIST OF PARTIES (CONTINUED)

53. Jack Bernstein
54. Jessica Flores
55. Anthony M. Goldstein dba Law Offices of Anthony M. Goldstein
56. High Desert State Prison (HDSP) - NDOC
57. Warden Calvin Johnson - NDOC (HDSP)
58. Nevada Department of Corrections (NDOC) Director Charles Daniels
59. NDOC Deputy Director Harold Wickham
60. Attorney General Aaron D. Ford in re C-17-323614-1
61. State of Nevada Office of Consumer Health Assistance <sup>(OMBUDSMAN)</sup>
62. Nicole Garcia of Murchison Law
63. Tyler Ure of Murchison Law
64. Steven B. Wolfson No. 1565
65. ~~Kristina Rhodes~~ <sup>JUSTICE COURT, LAS VEGAS TOWNSHIP</sup> No. ~~12480~~ Hon. Harmony T. Letizia, JDC <sub>Justice of the Peace.</sub>  
Nevada Bar
66. Laura Goodman No. 13390  
Nevada Bar
67. Taleen Pandukht No. 5734
68. Las Vegas Recovery Center in re C-17-323614 1
69. NuetoRestorative
70. Choices Group → BRIDGE COUNSELING
71. Nevada Community Enrichment Program (NCEP)
72. Mandalay Bay Corp., DBA Mandalay Bay Resort and Casino
73. Lukas B. McCourt - CLARK MCGCOURT, LLC
74. Rody H. Scott - CLARK MCGCOURT, LLC
75. "Will" e SEDGWICK
76. SEDGWICK CMS/Old Republic Insurance Co. / Agent For Freeman Companies
77. ~~Jason Lewis~~ HEALTHSOUTH off of Valley View and Charleston
78. Nevada Department of Administration, Hearings Division - Northern Division

LIST OF PARTIES (CONTINUED)

- 79. Nevada Attorney For Injured Workers "aka" - NAIW
- 80. Andrea Epping - SEDGWICK CMS
- 81. Gerri Lynn Hardcastle No. 13142 - Deputy Attorney General for Nevada
- 82. Craig Mueller <sup>Nevada</sup> Bar No. 4703
- 83. Larry Phillips <sup>Nevada</sup> Bar No. 7138
- 84. Kelsey L. Bernstein <sup>Nevada</sup> Bar No. 13825
- 85. Theresa Dodson
- 86. E. Del Padre
- 87. Supreme Court of Nevada
- 88. Capitol Police in re <sup>21</sup>CR019040
- 89. GENEX - SEDGWICK CMS
- 90. Capitol Police in re <sup>"aka" - GENEX -</sup> Karen Schwartz in C.17.323614 (2017)
- 91. P.S.A.V. "aka" - PRESENTATION AUDIO VISUAL SERVICES
- 92. Jennifer A. Dorsey - US DISTRICT COURT, DISTRICT OF NEVADA, Southern Division - Las Vegas
- 93. Magistrate ~~Nancy J. Koppe~~ DANIEL J. ALBRECHTS <sup>US Dist. Court</sup>
- 94. James "Jamie" H. Cocoran, BERNSTEIN & POISSON
- 95. Brian M. Boyer, BERNSTEIN & POISSON
- 96. Amber King, BERNSTEIN & POISSON
- 97. ~~G. Ford~~, Attorney General "SOP" Christina Greene
- 98. ~~D. Resch~~, Attorney General Dr. UNKNOWN re NVC <sup>"Dusky Standard"</sup> competency
- 99. ~~R. Garate~~, Attorney General "SOP" Stacey Ledesma
- 100. ~~Amanda White~~, Attorney General "SOP" Attorney Hastings
- 101. Attorney General Aaron D. Ford in re C.21.357927.1
- 102. NDOC James Dzurenda in re T.L.V.C.C.
- 103. NDOC ~~Associate~~ <sup>"Acting"</sup> Warden J. Bean - HDSP - Jeremy Bean
- 104. NDOC Associate Warden James Scally - HDSP

LIST OF PARTIES (CONTINUED)

105. NDOC Brian Williams
106. NDOC Senior CIO Curry in re B.M.U.
107. NDOC CIO Sage in re B.M.U.
108. NDOC CIO Brown in re UNIT 9
109. NDOC CIO Oisen
110. NDOC LT Oltevera
111. NDOC CIO Alvarez
112. NDOC CIO SGT Sanchez
113. NDOC Senior CIO Livingston
114. Evelyn R. Goddard, Clark County District Attorney
115. NDOC Senior CIO Martinez
116. ~~Lewis~~ "LEWIS" @ LEWIS, BRISBOIS, BISGAARD & SMITH, LLP
117. ~~Brisbois~~ "BRISBOIS" @ LEWIS, BRISBOIS, BISGAARD & SMITH, LLP
118. Bisgaard - @ LEWIS, BRISBOIS, BISGAARD & SMITH, LLP
119. Smith - @ LEWIS, BRISBOIS, BISGAARD & SMITH, LLP
120. University of Iowa Hospital
121. City of Maquoketa
122. John Deere Company
123. Lucinda - Rick Turnis
124. Lucreca Lavonna Schoenherr
125. Dennis Wayne Houston
126. NDOC Associate Warden Julie Williams
127. NDOC Caseworker Warner
128. Bernstein & Poisson, LLC
129. Sabina Demelas
130. ~~Scott L. Poisson, ESA No. 10186~~  
ELIZABETH GONZALEZ - EDOC

LIST OF PARTIES (CONTINUED)

131. ~~Ryan A. Kerbow, ESA No. 11403 NV PRP C. McCarrill~~
132. ~~Scott Poisson, ESA "SOP" EDDC Kristie Cury~~
133. ~~Ryan Kerbow, ESA EDDC "SOP" Mr. Moskal~~
134. ~~Michael P. Villani~~ EVAN B. BEAVERS dba NEVADA ATTORNEY FOR INJURED WORKERS - CARSON CITY
135. ~~Judge Barker~~ The Hon. David Barker
136. Bernstein & Poisson, LLP
137. Steve Sisolak and Governor Joe Lombardo
138. NDOC Associate Warden of Operations Ronald Oliver
139. Alexander G. Chen, Clark County District Attorney
140. NDOC inmate Michael Ray Knight
141. NDOC Senior CIO Ashcraft
142. NDOC CIO Draco Wilcovich
143. NDOC inmate No. 1129203 Jarred Heath Thompson
144. NDOC CIO ~~Pada~~ in re S.M.U.
145. NDOC CIO Vasquez in re S.M.U.
146. NDOC Caseworker Pardin in re S.M.U.
147. NDOC Caseworker Jefferson in re S.M.U.
148. NDOC LT CIO Barth in re S.M.U.
149. Clark McCourt, LLC
150. State Bar of Nevada
151. NDOC Caseworker Baker
152. NDOC Caseworker Smith
153. NDOC Caseworker Turnis
154. NDOC Caseworker Childers - Associate Warden
155. NDOC Caseworker Hernandez
156. NDOC Nevada Division of Forestry (NDF)

LIST OF PARTIES (CONTINUED)

157. Jaimre A. Stilz No. 13772
158. LVMPD House Arrest Officer Keyser
159. NDOC Movement/Transport C/O Nielson
160. Preferred Capital Funding
161. Oasis Financial
162. Brian Moonin
163. OASIS LEGAL FINANCIAL, LLC
164. Selestee A. Wyse, Clark County District Attorney
165. James Andrew Puccinelli, Clark County District Attorney
166. EJDC Court Clerk Cynthia Moleres
167. EJDC Recorder Velvet Wood
168. EJDC Recorder Brittany Amoroso
169. US DISTRICT COURT Andrew P. Gordon
170. US DISTRICT COURT Magistrate Brenda Wexler
171. EJDC Crystal Eller
172. NDOC TWCC LT Carlman
173. NDOC SDCC Warden Jerry Howell
174. S.O.P. Attorney "Kent" - KENT KOZAL, ESQ
175. NDOC Senior C/O Javier Garcia (509's)
176. EJDC Senior Judge James Crockett
177. EJDC Chief Judge Linda Marie Bell
178. Office of the Attorney General of NV - C. Martinez
179. Supreme Court of Nevada Justice Pickering
180. Chief Justice Parraguirre
181. Justice Cadish
182. Justice Hardesty

LIST OF PARTIES (CONTINUED)

- 183. Justice Herndon
- 184. Justice Stiglich
- 185. Justice Silver
- 186. Justice Gibbons
- 187. Justice Tao
- 188. Justice Bulla
- 189. Andrew Lococo
- 190. M. Mercier
- 191. Collette Martin
- 192. Elizabeth A. Brown
- 193. Linda Hamilton
- 194. Clark County Office of the District Attorney
- 195. Eighth Judicial District Court (EJDC)
- 196. CEO Steven D. Grienson
- 197. Michelle McCarthy
- 198. Chaunte Pleasant
- 199. Heather Ungermann
- 200. Amanda Ingersol
- 201. UNITED STATES DISTRICT COURT, DISTRICT OF NEVADA - Las Vegas
- 202. USDC Chief Judge Miranda M. Du-McDonald Carano LLP
- 203. USDC Clerk, Debra K. Kempf
- 204. USDC Chief Deputy Clerk, Vicente S. Angotti
- 205. USDC Magistrate V. Cam Farenbach
- 206. Ann Marie Dunn, Clark County DA's office
- 207. Nicholas Ventola, Oasis Finance
- 208. Abigail Fiala, Oasis Finance
- 209. Mayor of the City of Las Vegas, Carolyn Goodman

WHEREFORE, Appellant should be granted <sup>1-H</sup> injunctive relief in order to be able to properly serve all of the above ~~listed~~ parties pursuant to common law.

According to the facts, the Appellant's actual innocence is supported and meritorious. See attached:



STATEMENT OF FACTS: Human trafficked after being kidnapped

1. from his home in Iowa City, Iowa:  
2. 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. 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 CENC 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 #12483574A + #C1237802A; with the first being by J. Wood  
19 in the <sup>JUSTICE COURT, LAS VEGAS TOWNSHIP:</sup> ~~EIGHTH JUDICIAL DISTRICT COURT~~ 21-CR-019840 + 21-CR-035713. <sup>NEITHER Alexis M. Duecker</sup>  
20 visited Mr. Houston, whom is actually innocent pursuant to the facts: <sup>or Anthony M. Goldstein</sup>

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 extort, harass, threaten or "aggravated stalking any of the  
29 parties in any of his cases, neither did he act aggressively towards any other  
30 individual, business or entity. Mr. Houston is a victim of crime.  
31 WHEREFORE, Mr. Houston prays for relief this 13th day of December, 2023 :

**CERTIFICATE OF SERVICE**

I certify that on the date indicated below, I served a copy of this <sup>RESPONSE TO DOCKET 23-39492, DEMAND FOR REPARATIONS AND PETITION TO ESTABLISH FACTUAL INNOCENCE + RENEWED LIST OF PARTIES AS AN OPENING BRIEF</sup> completed informal brief form upon all parties to the appeal as follows:

- By personally serving it upon him/her; ~~or~~ <sup>See Summons</sup>
- By mailing it by first-class mail with sufficient postage prepaid to <sup>See Subpoena in e3dc case # A-22-859817-C</sup> the following address(es) (list names and address(es) of parties served):

Nev. Ct. Apps  
408 E. Clark Ave  
LV, NV 89101-4088

Lewis Brisbois Bisgaard & Smith LLP  
2300 W. Sahara Ave.  
Ste. 900 Box 2B  
Las Vegas, NV 89102

DATED this 13th day of December, 2023.



Signature of Appellant

Rev. Matthew Travis Houston

Print Name of Appellant

# 1210652 Po Box 650

Address

Indian Springs, NV 89070

City/State/Zip

610-762-4143<sup>or</sup> 714-916-7431

Telephone