

IN THE SUPREME COURT OF THE STATE OF NEVADA

BOBBY L. FRANKLIN,
Appellant,

vs.

D.J. LAUGHLIN, et al.,
Respondent.

Supreme Court No. 67364
District Court No. A707291

FILED

FEB 24 2015

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY [Signature]
CHIEF DEPUTY CLERK

MOTION FOR STAY FORM
FOR PARTIES WITHOUT ATTORNEYS

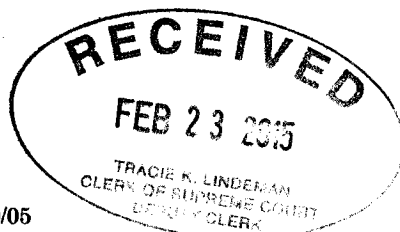
INSTRUCTIONS: Write only in the space allowed on the form. **Additional pages and attachments are not permitted.** The Nevada Supreme Court prefers short and direct statements. Citation to legal authority or the district court record is not required but would be helpful to the Court.

Any form you file with the Nevada Supreme Court must be mailed or delivered to all other parties to this appeal or to the parties' attorneys.

You may file your forms in person or by mail. You must file the original and 2 copies with the Clerk of the Nevada Supreme Court. If you want the clerk to return a file-stamped copy of your form, you must submit the original and 3 copies and include a self-addressed, stamped envelope. Documents cannot be faxed or e-mailed to the Clerk's Office.

This form must be filed with the Clerk of the Nevada Supreme Court at the following address:

Clerk of the Court
Supreme Court of Nevada
201 South Carson Street
Carson City, Nevada 89701
Telephone: (775) 684-1600 or (702) 486-9300



Judgment or Order You Are Appealing. Specify 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
1/14/2015	Motion to Expunge Property Title, Deed & Dismiss Complaint GRANTED;
1/20/2015	ORDER Granting Motion to Expunge Title on exhibit in the Complaint &
	Dismiss Complaint. (Order for Dismissal With Prejudice)

Notice of Appeal. Specify the date you filed your notice of appeal in the district court: 2/2/2015

Order to be Stayed. A stay from the Nevada Supreme Court prevents enforcement of a district court order. What do you want stayed?

The judgment and order that "expunged" my 80 acre Title & Deed rights on exhibit in the Complaint, without ever reading or examining its legal validity or effect.

Statement of Facts. Briefly explain the facts related to your request for a stay. (Your answer must be provided in the space allowed.)

On 9/20/1993, I re-recorded my 80 acre Title & Deed with the Clark County Recorder. On 12/19/1996, the Department of the Interior Board of Land Appeals ("IBLA") dismissed such re-recorded confirmation Title & Deed rights, in its *final* administrative decision. Subsequently, the federal judicial courts have denied their subject-matter jurisdiction to examine, review or enforce my confirmation property rights that are clearly guaranteed in my existing Title and Deed instrument.

On 1/14/2015 (on appeal), the District Court "expunged" my Title and Deed that was on exhibit in the Complaint, without ever reading or evaluating its legal validity; "dismissed" the QTA Complaint; and, ignored the related motions on the docket.

On 1/20/2015, a District Court Judge that had *resigned from office in 1995*, again

neglected his duty to examine the legal validity of my Title on exhibit in the
Complaint; expunged such Title; dismissed the Complaint with prejudice and
mooted the related motions on the docket

Effect on Your Appeal. If a stay is denied, how will this affect the issues you are appealing? (Your answer must be provided in the space allowed.)

The Defendants are currently trying to sell the subject 80 acres, during these Quiet
Title Action proceedings, and without Title Insurance to do so. The photo of their
billboard to sell it was filed on 12/22/2014, in the Plaintiff's Opposition to Defendant's
Motion to Expunge Lis Pendens and Motion to Dismiss Complaint, "Exhibit 3". To
prevent such extortion by the Defendants and the possible victims to accumulate, a
Stay from Expunging the Title and selling the described 80 acres in the Complaint
should not be denied during these QTA proceedings in abeyance.

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Harm to You. What serious harm will you experience if a stay is denied?
(Your answer must be provided in the space allowed.)

The Defendants can & will file their Order to "Expunge" with the Clark County Recorder, & immediately sell my land to other parties, during these proceedings. "Exhibit 3" in District Court is a photo of their "For Sale" sign(s) that they recently constructed on the described 80 acres to sell my asserted land to other parties.

Harm to Others. What harm will the other side experience if the stay is granted? (Your answer must be provided in the space allowed.)

NONE, because the Defendants can never get any Title Insurance on the property, without my 80 acre Title *rights* on exhibit in the Complaint being evaluated of its legal validity and effect in the judicial Clark County District Court.

Success on Appeal. Why are you likely to win this appeal? (Your answer must be provided in the space allowed.)

Pursuant to Federal & Nevada Rule of Civil Procedure 60(b)(4), the District Court's judgment or order on appeal is "**void**" of my Title rights on exhibit in the Complaint. A "**Void judgment**" is clearly defined in *Black's Law Dictionary* (See, Appeal Statem). The District Court has disregarded its subject-matter jurisdiction duty to evaluate the legal validity of my re-recorded property Title rights on exhibit in the Complaint, and is thereby inconsistent with due process of law and justice. (*Appeal Statement*)

CERTIFICATE OF SERVICE

I certify that on the date indicated below, I served a copy of this completed *Motion for Stay* 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):

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702-699-7500
Attorneys for the Defendants-Respondents

DATED this 17th day of February, 2015.

Bobby L. Franklin
Signature of Moving Party

BOBBY L. FRANKLIN (pro se)
Print Name of Moving Party

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