

IN THE SUPREME COURT OF THE STATE OF NEVADA

**FILED**

BOBBY LEN FRANKLIN,

Appellant,

vs.

D.J. LAUGHLIN, D/B/A/ BWD

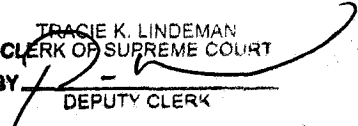
PROPERTIES 2, LLC; BWD

PROPERTIES 3, LLC; AND BWD

PROPERTIES 4, LLC,

Respondents.

AUG 25 2015

TRACIE K. LINDEMAN  
CLERK OF SUPREME COURT  
BY  -  
DEPUTY CLERK

Supreme Court Case No.: 67364

District Court No.: A-14-707291-C

COPY

---

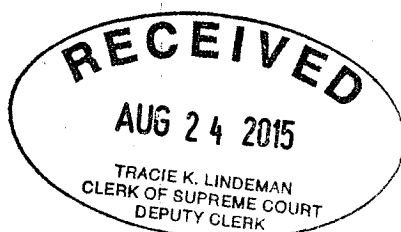
**OPPOSITION TO COUNTER-MOTION FOR SANCTIONS**

---

Sincerely submitted by:

Mr. Bobby Len Franklin (*pro se*)  
D/B/A/ Daydream Land & Systems Development  
Desert Land Entryman N-49548  
3520 Needles Hwy. Box 233  
Needles, CA. 92363

830-822-4791  
dlepatent@hotmail.com



15-25766

## I. INTRODUCTION

For many years now, the Respondents (lawyers) have been providing *false* information to the Nevada federal courts, by:

1. Falsely claiming Franklin ("I") do not have an existing *Title and Deed* on the described 80 acres, that I re-recorded with the Clark County Recorder on **9/20/1993**; and by,
2. Falsely claiming Franklin ("I") did not exhaust administrative remedies to my 80 acre Title confirmation rights, in the Department of the Interior's ("IBLA") final decision, that was certified to me on **12/19/1996**.

On 9/29/2008, the Respondents' lawyers convinced federal court 2:06-cv-1499 to grant the Respondents ownership Title to the 80 acres, and to annul my Title rights without reading them, all based on the (above) false information these lawyers have repeatedly provided to the federal court.

Subsequently, for the past few years now, this law firm has repeatedly requested such federal court to fine and *imprison* me, for simply requesting such federal court to examine and enforce my superior 1993 Title Deed rights.

On 7/13/2015, such federal court 2:06-cv-1499 fined me for \$5,260.50, plus interest, plus costs and reasonable attorney's fees, for simply requesting such federal court to examine and enforce my 1993 Title Deed rights, but it has not yet confined me into prison. (No judicial court ever examined my Title)

Now, in this Court, these lawyers are doing the exact thing, because I simply requested this Court to *order* my 1993 Title rights be examined.

## II. ARGUMENT

The Respondents' lawyers (above) acts are *prima facie* "extortion" committed, under a large number of criminal and civil laws. As pleaded in the pending Motion(s), I do have a solid *legal right* to condemn *all* of these federal court '***Void judgment(s)***' or orders that have *all* rejected their '*subject matter jurisdiction*' to ever examine or inforce my existing Title rights. This extortion can and should be stopped, and my 1993 Title rights be examined and enforced.

## III. CONCLUSION

Based on the foregoing, the Respondents *Counter-Motion for Sanctions* must be DENIED; all *void judgments* set aside; with an Order for the lower court to do its duty to examine the legal effect of my 1993 Title rights.

Sincerely submitted by,

s/Bobby L. Franklin  
BOBBY L. FRANKLIN (*pro se*)  
3520 Needles Hwy, Box 233  
Needles, CA. 92363  
830-822-4791 dlepatent@hotmail.com

8/20/2015  
DATED

## PROOF OF SERVICE

I certify under penalty of perjury that I mailed the foregoing *Opposition to Counter-Motion for Sanctions* to this Court Clerk and a copy to the following attorneys via prepaid USPS mail:

JOLLEY URGAL WOODBURY & LITTLE  
3800 Howard Hughes Pkwy.  
Wells Fargo Tower, 16<sup>th</sup> floor  
Las Vegas, NV. 89169  
E-mail: [FedCt@juww.com](mailto:FedCt@juww.com)  
*Attorneys for Respondents*

Sincerely submitted by,

s/Bobby Len Franklin  
BOBBY LEN FRANKLIN  
3520 Needles Hwy. Box 322  
Needles CA. 92363

830-822-4791  
[dlepatent@hotmail.com](mailto:dlepatent@hotmail.com)

8/20/2015  
DATED