

IN THE SUPREME COURT OF THE STATE OF NEVADA

Teddie C. Craig
Appellant,

VS.

Dr. Donnelly et.al.

Respondent

Supreme Court No. 75050 -COA

Dist. Court No. P116-1044

FILED

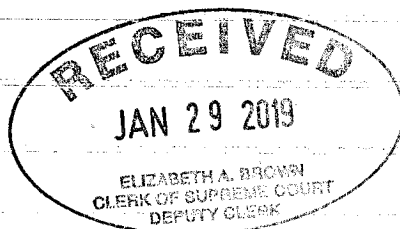
JAN 29 2019

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY J. Hednes
DEPUTY CLERK

OPPOSITION to Defendant's Motion
TO DISMISS

Appellant / Plaintiff, Moves This Court For A
Order to Dismiss or Denie Defendants Motion to
Dismiss and Reverse and Remand this Case back
to Dist. Court OR have this Case Removed to Federal Court.
With Good Cause Shown..

A Defendant Motion to Dismiss a plaintiff's
Complaint under Nev. R. Civ. P. 12(b)(5) is Subject to
a rigorous Standard OF Review on Appeal.



A Reviewing Court will recognize all
Factual Allegations in the Plaintiff's Complaint
AS True

- 1.) The U.S. Constitution were violated by the
Defendants, Plaintiff cited those violations in the Complaint.
- 2.) Defendants Subjected Plaintiff, to A Life
Threaten Situation.
- 3.) Defendants Failed to Remove this Case to the
Federal Court, And Dist. Court never gave Me a Chance to Fix the
Deficiencies in the Complaint.
- 4.) See Affidavit IN Support OF this Opposition to DISMISS.

Failure to Name The STATE AS A Defendant
which didn't Deprive the Court of Subject Matter
Jurisdiction in Counts 1 & 2 Plaintiff, Cited
The U.S. Constitution and This Should had
been Removed to the Federal Dist. Court.
FROM STATE COURT...

IN The Federal Dist. Court. A Plaintiff
Cannot Sue The STATE OF NEVADA OR NAME them
AS A Defendant IN a civil suit. See Will V. Michigan
Dept OF STATE Police, 491 U.S. 58, 65 1989 F Rule 82.

The Defendants Motion to DISMISS This Suite
Should be Denied Based on the FACT, That they
did not produce OR give Me any Discovery that
I had Requested per. Rules 26 Through 36,
Commencing 30 Days AFTER Service OF the
Complaint.

Plaintiff Respectfully Request this Court to
Remove this Case to Federal Dist. Court, by Reverse
and Remand. to Fix the Deficiencies, and to Complet
Discovery that the Plaintiff, had Requested From
the Defendants.

AFFIDAVIT IN Support OF Plaintiff's
Opposition to Defendant's Motion to
DISMISS

STATE OF NEVADA)
CARSON City NV.) ss:

I Teddie C. Craig, the undersigned, do hereby
Swear that all the following statements are true and
Correct, and to the best of my own personal knowledge.

1. Every event and statement made in my
INFORMAL Brief Filed on MAY 07 2018
is TRUE.
2. Every event and statement made in my
Opposition to Defendant's Motion to DISMISS
is TRUE.
3. The Defendants, had admitted to these Civil Rights
Violations.

I declare under penalty of perjury that the
Foregoing is True and Correct, and that this Document
is executed without the benefit of a Notary pursuant
to NRS 208.165, and/or 28-USCA:1746 as I am a
Prisoner to State Custody

x 
DATE 1-20-19

BASED ON THIS OPPOSITION AND Appellant's
INFORMAL BRIEF AND Plaintiff's AFFIDAVIT IN
SUPPORT OF THIS OPPOSITION TO DEFENDANT'S MOTION TO
DISMISS.

THE DEFENDANT'S MOTION TO BE DISMISSED SHOULD
BE DENIED AND THIS CASE SHOULD BE REVERSE AND
REMANDED TO THE DISTRICT COURT.

DATE 1-20-19

x 

CERTIFICATE OF SERVICE.

I Teddie C. Craig, at N.N.I.C.C. put in the U.S.
Postal Mail Box. a TRUE COPY OF Plaintiff's
OPPOSITION TO DEFENDANT'S MOTION TO DISMISS
MAILED OUT ON 1-24 2019. TO THE FOLLOWING.

ATTORNEY GENERAL OFFICE
100. N. CARSON ST.
CARSON, CITY, NV 89702

SUPREME COURT OF
NEVADA
CARSON CITY, NV. 89702

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