

1 Justin Langford-1159546
 2 H.D.S.P.
 3 P.O. Box 650
 4 Indian Springs, Nv 89070

5
 6 SUPREME COURT OF
 7 THE STATE OF NEVADA

8 Justin Odell Langford,

9 (Beneficiary)

Docket No.: 75825, 76075

10 Appellant,

Case No.: C-14-296556-1

11 -VS-

12 State Of Nevada,

Omnibus Motion

13 (Fictitious Party)

14 Appellee.

FILED

JUN 29 2018

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

15
 16 COMES NOW Justin Odell Langford, Sui Juris,
 17 Moves this Honorable Court to grant this
 18 Omnibus Motion, which is based upon all
 19 papers and pleadings on file with this court
 20 and the lower courts.

21 Request:

22 1) That a reasonable bail be set; or

23 2) Stay Of Sentence with release from
 24 custody ordered

25 Dated this day of June, 2018

26 By:

27 Justin Odell Langford

28 RECEIVED 1159546

29 Justin Odell Langford
 JUN 28 2018

ELIZABETH A. BROWN
 CLERK OF SUPREME COURT
 DEPUTY CLERK

18-24760

NOTICE OF MOTION

2 TO: SUPREME COURT JUDGES and THE STATE
3 OF NEVADA you will take notice that the
4 undersigned will bring the foregoing Motion
5 for Hearing in the above-entitled courts.

6 By:

7 Justin Odell Langford
8 NDOC #1159546

10
11 ARGUMENT

12
13 1) APPLICATION FOR BAIL PURSUANT N.R.S.
14 178.488

15
16 The Appellant comes to this Honorable
17 Court to set a reasonable bail, pending his
18 case outcome to return to custody. The
19 Appellant brings to this court's attention
20 the Judicial Notice he recently filed with it
21 regarding the court order showing denial of
22 writ of Habeas Corpus. Trial Court Judge
23 Susan H. Johnson signed this court order the
24 state prepared for her as the reason she
25 denied the writ of Habeas, but all it is a
26 copy, cut and paste of the States
27 Argument against the writ of Habeas.
28 There was no real decision made.

29 //

1 Judge Johnson signed the court order
2 denying writ of Habeas as her reason for
3 it, for the Judge to sign that order as it is
4 shows she did not read the writ of Habeas or
5 read the order drawn up by the State. This
6 is a direct disregard for the law and the
7 Appellants rights. This is a filing of false
8 documents and perjury on the judges part.
9 This creates a Misscarriage of Justice to
10 appellant.

11
12 2) APPLICATION For Stay Of Sentence Pursuant to
13 NRS 34.726

14
15 NRS 34.726(2) states in pertinent part:

16 2. The execution of a sentence must not be
17 stayed for the period in subsection 1
18 solely because a petition may be filed
19 within that period. A stay of sentence must
not be granted unless:

20 (a) A Petition is actually filed; and

21 (b) The Petitioner establishes a compelling
22 basis for the stay.

23 As you can see this is an appeal from an
24 adverse decision on a writ of Habeas and a
25 motion to correct an illegal sentence. So as to
26 NRS 34.726(2)(A) that requirement is met and has
27 been met since Dec. 29, 2017.

28 As to NRS 34.726(2)(B) this appellant's ex-girl
29 friend has run off and left my daughter K.L. with

1 are family members. But both sides are having
2 issues getting medical care for her and enrolling
3 her into school and other educational programs
4 because none of them have legal custody of
5 her and no one will take my signature cause
6 I'm in custody. I've tried doing power of atty
7 for certain family members to do things in my
8 place but no one will except it without an
9 official notary notarizing it. No one takes
10 it even if signed under NRS 208.165 which is
11 the perjury statute. This appellant can get
12 everything set and taken care of for his
13 family to have temporary custody while
14 he deals with his legal issues in this court.
15 If granted stay with release the appellant
16 will have access to funds that he don't
17 access to because he is in custody
18 which would allow him to take care of
19 this issue.

20 The appellant has also filed a petition
21 with multiple counts with numerous facts
22 to support each issue. The Appellants'
23 petition was never read or decided on
24 the merits by the trial Judge, there are
25 three major Constitutional violations in the
26 Appellants' case. Appellant had
27 ineffective assistance of trial Counsel,
28 ineffective assistance of Appeal Counsel,
29 and denial of discovery by the State.

1 With all of the above issues with all the
2 other issues on appeal brief and petition.
3 The appellant argued every issue raised
4 Very ~~thru~~ thoroughly in his memorandum along
5 with his traverse. The appellant believes
6 had the Judge actually read the petition
7 she would have granted the petition. But
8 because the Judge didn't do her job,
9 the appellant believes that had the trial
10 judge actually read the Writ of Habeas
11 corpus filed by him he would be waiting for
12 a new trial at this time.

13 14 CONCLUSION

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16 The appellant respectfully ask this
17 court to grant at least one of his request
18 for relief. The appellant ask that if this
19 court is incline to grant release him on
20 bail that they set a reasonable bail or
21 stay his sentence with release on O.R. due
22 to all the misscarriages of justice he has
23 suffered through out his case.

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2 Pursuant to 28 U.S.C. §1746, I, Justin Langford,
3 declare and verify, under penalty of perjury
4 under the laws of the United States of
5 America, that I have read the foregoing and that
6 it is true and correct to the best of my belief
7 and knowledge.

8 Dated this 24th day of June, 2018

9 By: Justin Langford, Sui Juris

10 All Rights Reserved UCC 1-308 (old 1-207).4)

11 Justin Odell Langford

12

13 CERTIFICATE OF SERVICE

14 I, Justin Langford, certify, that I have attached omnibus
15 motion with special instructions for electronic filing and
16 service to the clerk of the court to serve my
17 opponents pursuant to N.E.E.C.R. 9. Et seq. (A-E). Etc. to
18 the following;

19

20 Office of the District ~~Attorney~~ Attorney

21 200 E. Lewis Ave., 3rd Floor

22 Las Vegas, NV 89155

23

24 R. Langford

25 P.O. Box 942

26 Searchlight, NV 89046

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