

**MOT**

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May 07 2019 04:22 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

TIMMIE CAMERON, JR.,

Petitioner,

vs.

THE HONORABLE ERIC JOHNSON,  
EIGHTH JUDICIAL DISTRICT  
COURT JUDGE,

Respondent,

STATE OF NEVADA,

Real Party in Interest.

Case No.: 77669

District Court Case No.: C-18-333868-2

**MOTION TO PLACE ON CALENDAR FOR**  
**NOTICE OF GRANTING OF NEVADA SUPREME COURT**  
**WRIT OF MANDAMUS**

COMES NOW PETITIONER, TIMMIE CAMERON, JR., by and through  
his attorney of record, MICHAEL D. PARIENTE, and petitions this Honorable  
Court to grant his motion to publish his order as an opinion pursuant to NRAP  
36(f).

DATED this 7th day of May, 2019.

Respectfully submitted,



MICHAEL D. PARIENTE, ESQ.  
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Attorney for Appellant Timmie Cameron

**MEMORANDUM OF POINTS AND AUTHORITIES**

Publication of this order as an opinion is necessary. Under NRAP 36(c)(1) reads in relevant part:

**(c) Form of Decision.** The Supreme Court and Court of Appeals decide cases by either published or unpublished disposition.

(1) A published disposition is an opinion designated for publication in the *Nevada Reports*. The Supreme Court or Court of Appeals will decide a case by published opinion if it:

- (A) Presents an issue of first impression;
- (B) Alters, modifies, or significantly clarifies a rule of law previously announced by either the Supreme Court or the Court of Appeals; or
- (C) Involves an issue of public importance that has application beyond the parties.

In this case, up until the Court’s instant order, there has been a lack of clarity among the Justice Courts and District Courts as to whether or not the

District Courts must consider the bail set in the Justice Court in determining whether to increase bail after a defendant's case has been indicted and assigned to a District Court. Further, the Court's opinion significantly clarifies "good cause" as it relates to NRS 178.499(1) because the Order mandates the District Court consider bail previously set by the Justice Court in determining whether to increase bail. This issue is of monumental public importance that has application beyond the parties given the widespread usage of grand juries by prosecutors to indict defendants whose cases are in Justice Court where bail was previously set and who are now before the District Court.

DATED this 7th day of May, 2019.

Respectfully submitted,



MICHAEL D. PARIENTE, ESQ.  
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**RULE 28.2 ATTORNEY’S CERTIFICATE**

STATE OF NEVADA    )  
  )ss:  
COUNTY OF CLARK    )

I, Michael D. Pariente, being first duly sworn, deposes and states as follows:

- (1) I as the signing attorney have read the brief;
- (2) To the best of my knowledge, information and belief, the brief is not frivolous or interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation;
- (3) The brief complies with all applicable Nevada Rules of Appellate Procedure, including the requirement of Rule 28(e) that every assertion in the briefs regarding matters in the record be supported by a reference to the page and volume number, if any, of the appendix where the matter relied on is to be found; and
- (4) The brief complies with the formatting requirements of Rule 32(a)(4)-(6), and either the page- or type-volume limitations stated in Rule 32(a)(7).

DATED this 7th day of May, 2019.



Michael D. Pariente, Esq. for  
Timmie Cameron, Jr.

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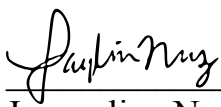
**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on the 7th day of May, 2019, a  
copy of the foregoing Motion was deposited in the United States Post Office at  
Las Vegas, Nevada, postage prepaid, addressed to the following:

Sheriff Joseph Lombardo  
Las Vegas Metropolitan Police Department  
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The Honorable Eric Johnson  
Eighth Judicial District Court  
Department 20  
200 Lewis Avenue  
Las Vegas, Nevada 89155

  
\_\_\_\_\_  
Jacqueline Nunez  
an employee of  
Michael D. Pariente, Esquire