

Joseph Laguna #60578
High Desert State Prison.

P.O. Box 650
27010 Cold Creek Ranch.
Las Vegas, Nevada 89070
Petitioner, In Pro se.

FILED

FEB 14 2020

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY S. Yancy
DEPUTY CLERK

Supreme Court
of Nevada

Joseph Laguna SC no: # 788166/788167.
Petitioner Dist Court: #A-18-785267-W.
VS.

State of Nevada. Motion to Appoint
Respondant. Counsel.

Petitioner, Joseph Laguna now moves this
Court for an Order granting him Counsel in
the action at hand.

This Motion is made and based upon all
papers, pleadings, on file and attached.

Points and Authorities

This Court has the authorities to
appoint counsel if it feels the petitioner
satisfies its standards by Law, which
would require it to appoint Counsel

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

20-06279

The Petitioner, Joseph Laguna is legally blind (See Exhibit A.) at all times relevant in this case and has been the subject of numerous operations, and surgeries on his eyes which prevent him from filing timely motions and petitions to challenge his conviction.

Petitioner is and continues to be the subject of surgeries, and operations in an attempt to correct his eye sight. he is legally blind in both eyes which prevents him from filing his petitions in a timely manner or continuing his appeal.

Based on his indigency and his physical disability to higher an attorney to file his appeals, and petitions good cause is shown which would allow this Court to order the appointment of Counsel as a matter of Law, preserved under the 5th, 10th and 14th amendment to protection of the Law, right to petition the Court, and the Due Process of the Law.

The Petitioner has a Constitutional Right to Challenge his conviction with the access to the Courts which can not be denied, yet do to his indigence and disability he is not able to obtain

Counsel on his own or file the Petitions on his own because he is blind and without a way to file said Petitions, respond to petitions, or litigate his case within reason.

Facts of Case.

Petitioner is legally blind and indigent which will not allow him to file the necessary petitions, motions, and responses required by Law.

The Petitioner is and continues to be the subject of operations, surgeries to fix his eyes which would not allow him to file the petitions, or to properly litigate his case.

Which requires this Court to order the Appointment of Counsel in good faith and to protect his Constitutional Rights of Due Process of the Law and access to the Courts.

Conclusion

Petitioner prays this Honorable Court will grant his Motion for the Appointment of Counsel to allow him the assistance that is needed to ensure that justice is served, and his Constitutional Rights preserved under both the Nevada, and U.S.

Constitution.

Dated this 26th day of January 2020.

By the Petitioner
Joseph Laguna.



Tel 702.485.5000
Fax 702.485.5001

Helga F. Pizio, MD
Ksenia Stafeeva, MD
Roman Fajardo, MD
Jason C. Smart, MD
Jeffrey K. Austin, OD
Andrew Kwong, OD

Date of letter: 12-19-19

Joseph Laguna
22010 Cold Creek Rd
Indian Springs, NV 89070

DOB: 7/21/1977

Patient last seen on: 12-19-19

To Whom It May Concern:

Joseph Laguna is considered legally blind in both eyes.

Visual Acuity:

OD Method Snellen scDva 20/400 Pinhole sc NI
OS Method Snellen scDva NLP

Impression:

Patient has multiple eye issues which required many surgeries. Currently treating for viral infection in the corneal transplant in the Right eye.

If you need further information please feel free to contact my office.

Sincerely,

Ksenia A. Stafeeva MD
Electronically Generated

New Eyes Las Vegas: 2020 Wellness Way, Suite 402, Las Vegas, NV 89106
New Eyes Green Valley: 7305 S. Pecos Rd, Suite 101, Las Vegas, NV 89120
New Eyes Centennial: 6850 N. Durango Dr, Suite 106, Las Vegas, NV 89149
New Eyes Summerlin: 10105 Banbury Cross Dr, Suite 255, Las Vegas, NV 89144
New Eyes Southwest: 8352 W. Warm Springs Rd, Suite 130, Las Vegas, NV 89113