

IN THE NEVADA COURT OF APPEALS

Ali Shahrokhi,

Petitioner,

vs.

The Eighth Judicial District Court Of  
The State Of Nevada, in and for the  
County Of Clark, and The Honorable  
Mathew Harter, District Court Judge,

Respondents,

Kizzy Burrow,

Real Party in Interest.

Electronically Filed  
Jul 02 2020 02:09 p.m.

Sup. Ct. Docket No. 81218  
Enabazh A. Brown  
Clerk of Supreme Court

Dist. Ct. Case No. D-18-581208-P

**RESPONSE TO PETITIONER'S MOTION SEEKING TO DISQUALIFY  
JUSTICE JEROME T. TAO PURSUANT TO NRS 1.225(4), NRAP RULE 35**

Real Party in Interest, Kizzy Burrow (hereinafter "Ms. Burrow"), by and  
through her attorney, THOMAS J. STANDISH, ESQ., hereby responds to the Motion  
Seeking To Disqualify Justice Jerome T. Tao Pursuant to NRS 1.225(4), NRAP rule  
35, filed by Petitioner, Ali Shahrokhi (hereinafter "Mr. Shahrokhi"). \

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DATED this 1<sup>ST</sup> day of July, 2020.

STANDISH LAW GROUP



THOMAS J. STANDISH, ESQ.  
Nevada Bar No. 1424  
1635 Village Center Circle, Suite 180  
Las Vegas, Nevada 89134

**MEMORANDUM OF POINTS AND AUTHORITIES**

There is no basis to recuse Justice Jerome T. Tao.

Robert Cerceo, Esq. (hereinafter “Mr. Cerceo”), was employed by the Standish Naimi Law Group between March 14, 2017 and February 28, 2018. On or about February 2018, due to the departure of several attorneys, including Mr. Cerceo, the Standish Naimi Law Group became the Standish Law Group.

It appears from the record that prior to his association with Mr. Standish, Mr. Cerceo represented Justice Tao’s former wife in post-divorce custody litigation against Justice Tao. Neither the Standish Naimi Law Group nor the Standish Law Group ever represented Justice Tao’s former wife. Given the possibility that the post-divorce custody litigation might become active again, Mr. Cerceo believed there was a chance he would find himself with a case in front of Justice Tao in one matter while at the same time adverse to Justice Tao in another matter.

Justice Tao's former wife was never represented by Ms. Burrow's current counsel or any current employee of the Standish Law Group. There is no overlap of time between Mr. Cerceo being associated with Mr. Standish and Mr. Cerceo representing Justice Tao's former wife: Mr. Cerceo's representation of Justice Tao's former wife ended in May 2016, prior to him joining the Standish Naimi Law Group in March 2017. There is also no overlap between Mr. Cerceo's association with Mr. Standish and Mr. Standish's representation of Ms. Burrow: Ms. Burrow's case began in December 2018, after Mr. Cerceo left the Standish Naimi Law Group in February 2018.


Even if there were any bias or appearance thereof, such bias would be *against* Ms. Burrow. The tenuous connection with Justice Tao is an adversarial one – Mr. Cerceo represented Justice Tao's former wife *against* Justice Tao.

Petitioner's Motion to Disqualify is the latest manifestation of his need to blame others for his own misbehavior. Justice Tao's dissent was insightful: Petitioner could have obtained a psychological evaluation rather than petition the Court of Appeals. Rather than correct his clearly inappropriate behavior, Petitioner

1 “hatched a bold plan of legal attacks.”<sup>1</sup> These legal attacks included five appellate  
2 petitions, four of which included a request to remove the case from Judge Harter  
3 (79992, 80277, 80447, 81218). Petitioner also filed two appellate motions to  
4 disqualify Justice Tao (the first was denied, the second is now under review), filed a  
5 Motion to Disqualify Judge Harter at the District Court level (which was denied),  
6 and in the last month filed a Federal Lawsuit seeking damages against Judge Harter,  
7 the Clark County, and the State of Nevada. Petitioner seems to believe that if he can  
8 litigate enough, eventually everyone will give up.

9 Kizzy’s current counsel do not assert that any possible bias that Justice Tao  
10 may once have had against Mr. Cerceo has somehow transferred to them.

11 DATED this 18 day of July, 2020.

12   
13 THOMAS J. STANDISH, ESQ.  
14 Nevada Bar No. 1424  
15 1635 Village Center Circle, Suite 180  
16 Las Vegas, Nevada 89134  
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18  
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<sup>1</sup> Ali Shahrokhi’s Complaint for Damages & Injunction, *Ali Shahrokhi v. Judge Matthew Harter in His Honor’s Official Capacity as Judicial Office, (2) Clark County, (3) State of Nevada and Does 1-10*, US Dist. Ct., 2:20-cv-01019-APG-VCF, 14:26-27 (June 9, 2020).

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing RESPONSE TO PETITIONER'S MOTION SEEKING TO DISQUALIFY JUSTICE JEROME T. TAO PURSUANT TO NRS 1.225(4), NRAP RULE 35 was served, on this 2nd day of July, 2020, as follows:

By mailing it by first class mail with sufficient postage prepaid to the following address:

Honorable Mathew Harter  
District Court Judge Department N  
Eighth Judicial District Court  
Family Division  
601 North Pecos Road  
Las Vegas, Nevada 89101-2408

Ali Shahrokhi  
10695 Dean Martin Dr. #1214  
Las Vegas, NV 89141  
*Petitioner in Proper Person*

  
HOLLY THIELKE  
An employee of Standish Law Group