

1 **ALI SHAHROKHI**
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6 *In Proper Person*

FILED

NOV 20 2020

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

7
8 **IN THE SUPREME COURT OF NEVADA**

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11 **ALI SHAHROKHI,**

12 Appellant,

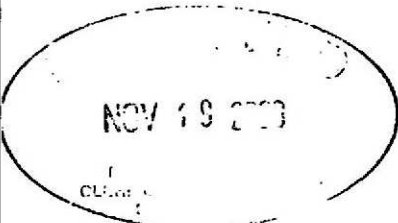
13 vs.

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15 **KIZZY BURROW,**

16 Respondent.

) **Supreme Court Case No.: 81978**

) **District Court Case No.: D-18-581208-P**

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1 **REPLY TO OPPOSITION TO JUDICIAL NOTICE**

2 SHAHROKI filed a motion asking the Court to take judicial notice of
3 NRS126.036, which is entitled: "Liberty interest of parent in care, custody and
4 management of parent's child is fundamental right."

5 NRS 126.036 says that—

6 ***"The liberty interest of a parent in the care, custody and***
7 ***management of the parent's child is a fundamental right."***

8 This fundamental right to parent is important because parenting is
9 essential in family court matters. Furthermore, the fundamental right to parent
10 is important because too many family court judges and lawyers refuse to
11 acknowledge that parenting is a fundamental right.

12 In Clark County, judges and lawyers act in collusion to pretend that
13 parenting is somehow not a fundamental right. Judges and lawyers
14 intentionally and vexatiously increase litigation costs for their own benefit.
15 The more they let the litigation drag on, the more money they extract from
16 desperate parents whose children have been kidnapped by a corrupt court and
17 a corrupt judge.

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19 **Defendant's Arguments:**

20 KIZZY'S lawyers say that SHAHROKHI is "confused," (*Opposition*, page 1,
21 line 17). However, nothing could be further from the truth. KIZZY'S lawyers
22 are blatantly and intentionally misleading the court in order to drive-up
23 litigation costs and attorney's fees. In misleading the court, KIZZY'S lawyers
24 make idiotic arguments. The court must stop KIZZY'S lawyers.

25 Under Nevada law, NRS 126.036 is a statement of public policy. NRS
26 126.036 neither commands nor forbids any conduct. It is an express declaration
27 which says that parenting is a fundamental right, which means it is equivalent
28 to constitutional rights.

1 KIZZY'S lawyers went to law school. They should be able to understand
2 that NRS 126.036 neither commands nor forbids any conduct. KIZZY'S lawyers
3 should therefore be able to recognize that NRS 126.036 is a declaration of public
4 policy. NRS 126.036 declares that parenting is a fundamental right, however,
5 KIZZY'S lawyers intentionally ignore fundamental rights because it benefits
6 them monetarily. KIZZY'S lawyers want the case to drag-on so they can earn
7 more attorney's fees from KIZZY, (and ultimately, from SHAHROKHI).

8 KIZZY'S lawyers violate *Nevada Rules of Professional Conduct* Rule 3.3,
9 ("*Candor Toward the Tribunal*"). Rule 3.3 says that: "A lawyer shall not
10 knowingly make a false statement of fact or law to a tribunal or fail to correct a
11 false statement of material fact or law previously made to the tribunal by the
12 lawyer." [NRPC Rule 3.3]

13 KIZZY'S lawyers also violate *Nevada Rules of Civil Procedure*, Rule
14 11(b)(2), which says that: "The claims, defenses, and other legal contentions are
15 warranted by existing law." [NRCP Rule 11(b)(2)]. KIZZY'S lawyers make legal
16 arguments NOT warranted by existing law. KIZZY'S lawyers mislead the court.

17 STANDISH and SPRADLING pretend they are in the family court
18 "circus" to which they are accustomed. However, the Nevada Supreme Court is
19 the highest court in the state and does not tolerate the unprofessional tactics of
20 lawyers like STANDISH and SPRADLING.

21 KIZZY'S lawyers claim that: "a parent's interest in the custody of a child
22 is not the stuff of which fundamental rights ... are made," citing *Michael H. vs.*
23 *Gerald D.* 491 US 110, 127, 109 S. Ct. 2333, 2344 (1989). However, this case is
24 bad law. It is over 30 years old! In the year 2000, the Supreme Court in *Troxel*
25 *v. Granville*, 530 U.S. 57, (2000), decided that parenting is a fundamental right.
26 KIZZY'S lawyers are misleading the court by citing a 30-year-old case. And, to
27 make matters worse, they purposely ignore the *Troxel* decision from the year
28 2000, (as well as NRS 126.036), which says that parenting is a fundamental
right.

1 Furthermore, the Michael H. case is not relevant because the party
2 declaring to have a fundamental right never had custody of the minor in the first
3 place. By contrast, SHAHROKHI'S name appears on the minor child's birth
4 certificate because he is the natural father and he once enjoyed the exercise of
5 his custodial rights (until the minor child was kidnapped by the courts).

6 KIZZY'S lawyers are making stale-dated arguments on purpose. KIZZY'S
7 lawyers are purposely misleading the Court with cases that are bad law, all the
8 while ignoring Troxel, which says that parenting is a fundamental right.

9 And then, in Nevada, in 2013, the legislature passed NRS 126.036, which
10 explains in crystal clear language that parenting is a fundamental liberty
11 interest, yet KIZZY'S lawyers ignore this law. STANDISH and SPRADLING
12 now intentionally deceive the court with bad case law and bad interpretation of
13 existing statutes.

14 Next, KIZZY'S lawyers argue that: "NRS 126.036 is in the context of
15 establishing paternity." But this is just ridiculous. All one needs to do is read
16 NRS 126.036, which never mentions the word "paternity." KIZZY'S lawyers
17 intentionally deceive the court. KIZZY'S lawyers do this nonsense in district
18 court, but the Nevada Supreme Court must not allow these tactics.

19 KIZZY'S lawyers proceed in bad faith. They write nonsense that makes no
20 sense in the English language. For example, the *Opposition*, (at page 2, line 5),
21 KIZZY'S lawyers write...

22 "Moreover, NRS 126.036(b) expressly provides circumstances in which a
23 state courts and other state entities from acting in their official capacity
24 within the scope of their authority." [*Opposition*, page 2, line 5.]

25 What on earth does this mean? This is all smoke and mirrors.
26 SHAHROKHI should not have to waste time responding to such nonsense.
27 This Court should sanction these lawyers for misleading the court and for
28 wasting everybody's time with their vexatious lies!

1 **Preposterous!**

2 Remarkably, KIZZY'S lawyers are asking the highest court in the State
3 of Nevada to NOT take notice of their own laws! This is preposterous! The
4 Nevada Supreme Court is already obliged to follow state law. SHAHROKHI
5 must ask the Court to take notice because the lower court refused to do so.

6 Why are KIZZY'S lawyers opposing the request for judicial notice?
7 Because they see it as a billing opportunity. KIZZY'S lawyers are ripping-off
8 KIZZY, and she doesn't even know it.

9 NRS 126.036 proves that parenting is a fundamental right. However,
10 KIZZY'S lawyers and the judge go out of their way to avoid recognizing this
11 fundamental right.

12
13 **Conclusion**

14 KIZZY'S lawyers provide no compelling argument against the court taking
15 judicial notice. KIZZY'S lawyers misrepresent the law. On top of that, they
16 make no argument why this court should not take judicial notice.

17 KIZZY'S lawyers violate the *Nevada Rules of Professional Conduct*, Rule
18 3.3, ("*Candor Toward the Tribunal*"). When KIZZY'S lawyers represent that
19 NRS 126.036 is not a declaration of public policy, and when they represent that
20 parenting is not a fundamental right, they knowingly make a "false statement(s)
21 of law to a tribunal." [NRPC Rule 3.3]

22 KIZZY'S lawyers also violate *Nevada Rules of Civil Procedure*, Rule
23 11(b)(2). When KIZZY'S lawyers represent that NRS 126.036 is not a
24 declaration of public policy, and when they represent that parenting is not a
25 fundamental right, KIZZY'S lawyers make "legal contentions not warranted by
26 existing law." [NRCP Rule 11(b)(2)]

27 KIZZY'S lawyers needlessly increase litigation costs and needlessly delay
28 these proceedings. This is sanctionable conduct. SHAHROKHI respectfully
requests that KIZZY'S lawyers be sanctioned accordingly.

1 **Date: November 15, 2020**
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4 **Respectfully Submitted,**

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9 **ALI SHAHROKHI, APPELLANT**
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15 **AFFIDAVIT of APPELLANT**
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17 My name is ALI SHAHROKHI, the Appellant. All facts alleged are true and
18 correct of my own personal knowledge. If called upon to testify, I would give
19 competent and truthful evidence.

20 I hereby declare under penalty of perjury under the laws of the State of
21 Nevada, this affidavit is true and correct.

22 Dated: **November 15, 2020**
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27 _____
28 **ALI SHAHROKHI**

-CERTIFICATE-OF-SERVICE-

I am an individual over the age of eighteen and not a party to the within action. My home address is 10695 Dean Martin Dr. #1214, Las Vegas, Nev. 89141. My phone number is (702)835-3558.

On **Nov. 16, 2020**, I served the following: **Reply to Defendant's response to Plaintiff's Request for Judicial Notice**

on an interested party in the above-entitled action by

 X via e-mail transmission,

 personal service on the person below listed,

 X depositing it in the U.S. Mail, postage prepaid,

and addressed to the person below listed,

 overnight delivery, addressed as follows:

**Thomas Standish, ESQ.
Standish Law
1635 Village Center Cir. #180
LAS VEGAS, NEV. 89135**

**Mathew Harter, District Court Judge
601 N. Pecos Rd.
Las Vegas, NV 89101**

I declare under penalty of perjury under Nevada law the foregoing is true and correct.

Dated: **Nov. 16, 2020**



/s/ Ali Shahrokhi

Declarant.