

1 Ali Shahrokhi  
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3 Las Vegas, NV 89141  
4 (702) 835-3558  
5 Alibe76@gmail.com  
6 In Proper Person

**FILED**

**DEC 30 2020**

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY S. J. [Signature]  
DEPUTY CLERK

**FILED**

**DEC 31 2020**

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY [Signature]  
DEPUTY CLERK

**IN THE NEVADA COURT OF APPEALS**

6 ALI SHAHROKHI,  
7 Appellant,

) Case No.: 81978-COA

8 vs.

) District Court Case No.: D-18-581208-1

9 KIZZY BURROW,  
10 Respondent.  
11

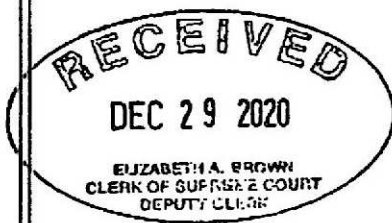
12 **APPELLANT'S MOTION TO EXTEND TIME IN WHICH TO FILE THE**  
13 **MOTION TO DISQUALIFY OR IN THE ALTERNATIVE ACCEPT A**  
14 **LATE FILING; AND PREMISSION TO EXCEED THE PAGE LIMIT**

15  
16 COMES NOW, Appellant, ALI SHAHROKHI ("ALI"), appearing in  
17 Proper Person, hereby moves this court to grant him an extension of time  
18 or in the alternative accept a late filing. Additionally, ALI requests  
19 within this same motion that he be granted permission to file his motion  
20 disqualifying Judge Jerome T. Tao, Judge Michael P. Gibbons and Judge  
21 Bonnie Bulla in excess of the 10 page limit.

22  
23 **I.**

24 **Request for an Extension of Time/Accept a Late Filing**

25 ALI is not an attorney and is before this court in proper person. In  
26 considering such, ALI is learning-as-he-goes on this appeal and is trying to  
27 mitigate mistakes as soon as he discovers them.  
28



~~20-46911~~

20-46999

1 ALI confused the parameters in calculating time to file a motion for  
2 judicial disqualification in this court. He understood that he had a  
3 timeline of 60 days from docketing, but ALI thought that docketing meant  
4 docketing statement, which was filed on 12/11/2020, just two weeks ago  
5 and in the middle of the holiday season.

6 Ultimately ALI confused which docketing started the clock to file  
7 this motion. There is the docketing which took place on 10/22/2020, the  
8 docketing statement filed on 12/11/2020 and then the case will have future  
9 docketing once the routing statement is reviewed. ALI now thinks he may  
10 have used the wrong "docketing" date in his calculations and that the time  
11 to file his motion to disqualify started on 10/22/2020, where the time limit  
12 to file the motion to disqualified would have expired on 12/22/2020, just  
13 prior to the Government holidays.

14 ALI is not filing this motion to delay proceedings and in good faith  
15 makes this request to extend the time for filing this motion for  
16 disqualification or in the alternate, accept a late filing. In such, please  
17 consider that only one judicial day has passed since the deadline, and ALI  
18 is trying to correct his mistakes as soon as possible. ALI appreciates the  
19 grace this court has given thus far in allowing him extended time to grieve  
20 and handle his late sister's affairs during these proceedings.

21 Importantly, ALI had formed arguments for disqualification and in  
22 his research found that the disqualification applied to all three judges who  
23 decided on his writs pending a final judgement. Immediately upon  
24 discovering that the Nevada Revised Code of Judicial Conduct Rule 2.11  
25 was applicable to this case, he is filing the motion to disqualify, which is  
26 not bound to the timelines set forth in NRAP 35. Again, since ALI is not  
27 an attorney he wants to be sure file a motion for the Court to consider the  
28 exception to the timelines when disqualification is predicated under the

1 Nevada Revised Code of Judicial Conduct. Also informing the court of his  
2 inadvertent mistake in miscalculating the timeline directed under NRAP  
3 35.

4 ALI does not waive his need to disqualify and in the instance that  
5 arguments made under NRS 1.225 and NRAP 35, have now expired and if  
6 this court will not consider the arguments; ALI asks that this court  
7 consider the motion to disqualify based on The Nevada Revised Code of  
8 Judicial Conduct, which is not bound to such timelines.<sup>1</sup>

## 10 II.

### 11 Additional Pages Requested

12 ALI asks that this court consider the motion to disqualify with  
13 additional seven pages as the motion is requesting disqualification of not  
14 one judge, **but three**. Furthermore, the underlying proceedings are vast  
15 both in the district court and the appellate court, as are the errors and  
16 reasons and arguments for disqualification. It is of the utmost importance  
17 that, moving forward, ALI's due process is upheld and that his case is  
18 reviewed under fair circumstances. It is of the utmost importance that  
19 there are no doubts as to the fairness of ALI's proceedings, as his due  
20 process has been found to have been violated already and his right to  
21 parent is protected by the fourteenth amendment.

22 Considering such, it is very important that the decisions be made on  
23 the merits, which is why the additional pages are necessary. ALI tried but

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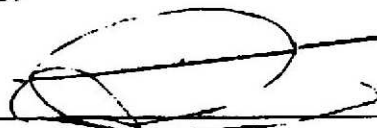
24 <sup>1</sup> "To the extent that our opinion in PETA suggests that motions under the NCJC  
25 must meet timelines contained in other provisions, such as NRS 1.235 or NRAP 35,  
26 it is [\*261] overruled. Similarly, our decision in Matter of Parental Rights as to  
27 Oren is overruled to the extent that it held the disqualification affidavit in that case  
28 timely under NRS 1.235." *Towbin Dodge, L.L.C. v. Eighth Judicial Dist.*, 121 Nev.  
251, 260-261, 112 P.3d 1063, 1069-1070, 2005 Nev. LEXIS 31, \*18, 121 Nev. Adv.  
Rep. 27 (Nev. June 9, 2005)



1 could not contain all of the necessary facts and arguments within the 10  
2 page limit and henceforth respectfully requests that this court accept the  
3 motion to disqualify three judges at 17 pages.

4 These requests to extend time and add pages to the motion to  
5 disqualify are made in good faith and not done to delay proceedings.

6  
7 DATED this 28<sup>th</sup> day of December, 2020.

8  
9   
10 Ali Shahrokhi  
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## VERIFICATION

I declare under penalty of perjury that I have read this motion to extend deadlines and add pages, that the information provided in this motion to extend deadlines and add pages is true and complete to the best of my knowledge, information and belief.

ALI SHAHROKHI

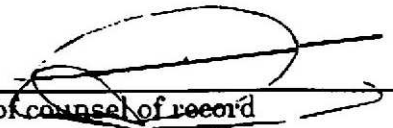
Name of appellant

Proper Person

Name of counsel of record

12/28/2020

Date

  
Signature of counsel of record

Nevada, Clark County

State and county where signed

## CERTIFICATE OF SERVICE

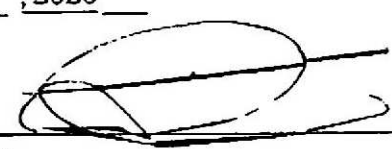
I certify that on the 29 day of December, 2020, I served a copy of this completed motion to extend time and add pages upon all counsel of record:

- ☐ By personally serving it upon him/her; or
- ☒ By mailing it by first class mail with sufficient postage prepaid to the following address(es): (NOTE: If all names and addresses cannot fit below, please list names below and attach a separate sheet with the addresses.)

**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**

Dated this 29 day of December, 2020

  
Signature