


FILED

APR 13 2021

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY 
DEPUTY CLERK

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

IN THE SUPREME COURT OF NEVADA

ALI SHAHROKHI,)	Case No.: 82245
Appellant,)	
)	District Court Case No.: D-18-581208-P
vs.)	
)	
KIZZY BURROW,)	
Respondent.)	
)	

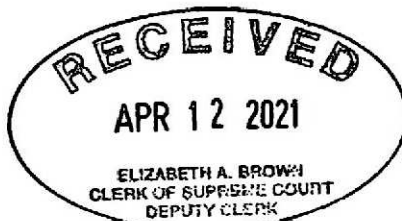
MOTION FOR ORDER GRANTING EXPANSION OF PAGES FOR
MOTION FOR STAY

ALI SHAHROKHI ("ALI"), in proper person, respectfully requests that this court issue an order granting him permission to file his Emergency Motion for Stay which exceeds the NRAP 27 (d)(2) page limit of 10 pages.

DATED this 12th day of April, 2021.

Authentisign
Ali Shahrokhi
4/12/2021 11:28:44 AM PDT

Ali Shahrokhi
10695 Dean Martin Dr. #1214
Las Vegas, NV 89141
702-835-3558



The issues in this case involve a post-judgement order which includes UNCONSTITUTIONAL ORDERS and the lower court lacking subject-matter jurisdiction which is a serious violation of Appellant's due process rights. . If this stay is NOT granted this court will continue to deprive the appellants out of his constitutional rights and that itself has legal consequences as well.

Ali's Motion for Stay is essential to Ali's case, and the appeal will be in vain if this stay is not granted. Worse, the level of damage to ALI's constitutional rights cannot be compensated monetarily.

The importance of the Motion for Stay is the reason why ALI exceeds the 10-page limit, also the extensive occurrences of abused discretion and error in the underlying case are significant and many. ALI is not an attorney and it is very difficult to argue the issues in a concise way, as English is not ALI's first language, it takes more time and more words to get his point across. The stay written by a seasoned attorney for the petition for writ in 79336-COA, was almost double the page allowance. Here ALI is pro se and the stay is so important to me I cannot risk leaving something out, as if this stay is not granted, *my fundamental rights to parents continue to be violated*. This stay is vital to my appeal, as if it is not granted.

ALI has striven to present the fullest picture in support of the request for stay, while still being mindful of the NRAP limitation. In doing that, ALI has been unable to get the motion for stay under 12 ½

1 pages of substance. Therefore, ALI requests that this Court permit the
2 filing of the The Motion for Stay.

3 ALI requests that the stay be accepted because there is good cause
4 in this particular case.

5 Entered in this action on the 12th day of April, 2021.
6
7
8

9 Authentisign
Ali Shahrokhi

10 4/12/2021 11:28:45 AM PDT
Ali Shahrokhi
11 10695 Dean Martin Dr. #1214
12 Las Vegas, NV 89141
13 (702) 835-3558
Alibe76@gmail.com
14 *In Proper Person*

15 **CERTIFICATE OF COMPLIANCE**
16

17 1. I certify that the underlying motion is necessary to avoid irreparable
18 harm and that relief is needed.

19 2. I further certify that the Respondent Judge and opposing counsel for
20 the real party in interest are being notified of this motion
21 contemporaneously with this filing and will receive a copy of this motion
22 as set forth in the Certificate of Service below.

23 4. Orders exceeding Jurisdiction are VOID.
24
25
26
27
28

5. This motion should be granted for the reasons set forth above.

6. I certify that this motion complies with the requirements of NRAP 2.

DATED this 12th day of April, 2021.

Authentisign
Ali Shahrokhi
4/12/2021 11:28:46 AM PDT

Ali Shahrokhi
10695 Dean Martin Dr. #1214
Las Vegas, NV 89141
(702) 835-3558
Alibe76@gmail.com
In Proper Person

-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 **April 12th, 2021**, I served the following:

Motion for Extra Pages

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,

1 and addressed to the person below listed,
2 _____ overnight delivery, addressed as follows:

3
4
5 Mathew Harter, District Court Judge
6 601 N. Pecos Rd.
7 Las Vegas, NV 89101

8 Yvonne Ruiz
9 170 S Green Valley Pkwy. #300
10 Henderson, NV 89012

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

13 Dated: **April 12, 2021.**

14
15 Authentisign
Ali Shahrokhii
16 4/12/2021 11:28:47 AM PDT