

FILED

JUN 02 2021

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

1 Ali Shahrokhi
2 10695 Dean Martin Dr. #1214
3 Las Vegas, NV 89141
4 (702) 835-3558
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6 In Proper Person

7 **IN THE SUPREME COURT OF NEVADA**

8 ALI SHAHROKHI,)
9 Appellant,) Case No's.: **81978/82245**
10 vs.) District Court Case No.: D-18-581208-P
11 KIZZY BURROW,)
12 Respondent.)
13)

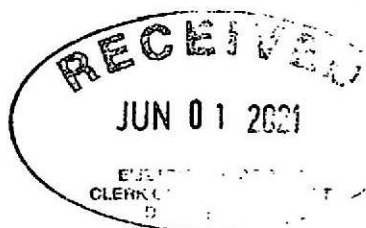
14 **"MOTION TO REQUEST FOR**
15 **RECONSIDERATION/REVIEW OF DENIAL OF MOTION**
16 **FOR LEAVE TO FILE A BRIEF IN EXCESS OF THE PAGE**
17 **LIMITATION TO BE HEARD BY 3 JUSTICE PANEL PER**
18 **NARP 27(C)(2)**

19 ALI SHAHROKHI ("ALI"), in proper person, respectfully submits this
20 Motion for reconsideration/REVIEW of DENIAL filed on 5/24/2021 on
21 motion to leave to file a brief in excess of the page limitation to be heard AND
22 reviewed by 3(Three) justice panel per NARP 27(c)(2). Shahrokhi respectfully
23 asks this Court to consider all facts involved for a good cause and grant this
24 order.

25 **DATED** this 1st day of June, 2021.

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Ali Shahrokhi
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26 Ali Shahrokhi
27 10695 Dean Martin Dr. #1214
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21-15454

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Shahrokhi respectfully requests this court to reconsider/review its order by a 3 justice panel instead of a single justice as per NARP 27(c)(2).

Courts cannot deny you access to the courts simply because you do not have an attorney. (Haines v Keaner) et al, 404 U.S. 519, 92 S. Ct 594, 30 L. Ed 2d 652.

However in-artfully Shahrokhi's fast track statement is, it must be held to less stringent standards than formal pleadings drafted by lawyers and can be only dismissed for failure to state a claim. If extra pages are not granted for a good cause as Shahrokhi has demonstrated before this court and has proven to set factors straight in support of his long list of arguments and violation of his due process rights and constitutional rights since the inception of custody case # D-18-581208-P-which would entitle him to relief, it will cause Shahrokhi and his minor child a true injustice.

Statement of Facts

Shahrokhi has filed two separate appeals under Nevada Supreme Court case # 81978 on 10/22/2020 and Nevada Supreme Court case # 82245 on 12/22/2020. Shahrokhi has paid a filing fee of \$250 per appeal for a total of \$500 for both cases as required per NARP.

Pursuant to NRAP(32)(7)(a)(i) every appellant has a maximum up to 30 pages per brief per appeal.

This Court by a single justice, Sua Sponte has combined both of these appeals for the sake of judicial economy and Shahrokhi has never filed a motion asking the two cases to be combined.

1
2 Since there are now two appeals combined, per NARP rule
3 32(7)(a)(i) maximum number of up to 30 pages limit per brief should
4 apply to each appeal on record and therefore a total of up maximum of
5 up to 60 pages for both combined briefs should be granted per NARP
6 32(7)(a)(i).

7 Every appellant is entitled to the maximum of 30 pages per brief
8 under NARP 32, and Shahrokhi should not have to forfeit any of the
9 pages that is guaranteed to every other appellant per NARP 32 just
10 because this court has decided to combine both cases sua sponte for
11 judicial economy reasons.

12 Shahrokhi believes this court is abusing its process by suddenly
13 ordering Shahrokhi a reduction of 15 pages per brief compare to what
14 is allowed under NARP 32(7)(a)(i) which is maximum of 60 pages for
15 two briefs.

16 INTRODUCTION

17 My case involves 8 writs of mandamus now where one, COA-
18 79336 the orders were remanded and the judge REFUSED followed the
19 writ, which is why I still have not seen my son on over 600 days and
20 have not been afforded even one visitation with him which is a direct
21 violation of my fundamental liberty interest as well as infringing on my
22 constitutional rights without proving subject-matter jurisdiction on the
23 record by the district court judge as he was challenged prior to trail
24 either though statutes or constitutional authority.

25 On August 6, 2019 , I hired, Bruce Shapiro, Esq., and Jack
26 Fleeman, Esq., who filed an emergency petition for writ of mandamus.
27
28

1 This was almost 2 years ago and many less issues involved and yet That
2 petition was 60 pages long, encompassing only 8 months of proceedings.
3 Since 8/6/2019 the issues have continued to be even more extensive and,
4 the willful misconducts and errors have multiplied in the past 18
5 months since that petition was filed.

6 I am in proper person, and I'm not an attorney, neither is my
7 native language English. I now have 2 appeals before this court and
8 much more issues that require the adjudication of the Nevada Supreme
9 Court and the very least the 30 page maximum per appeal should be
10 extended to me as well and I should be allowed at the very least to have
11 up to maximum of 60 pages for both appeals.

12 Court of appeals in 2019 accepted the 60 page petition for writ
13 from a licensed Nevada attorney; I hope I am not discriminated against
14 for being in proper person regarding the exhaustive amount of
15 information that must be reviewed by this court.

16 The issues in this case are **egregious** and my rights to parent
17 were stripped (no matter how the judge has labled or spinned the final
18 judgment ORDER) without following procedures in NRS 128 as
19 mandated for termination of parental rights. My son has been relocated
20 relocated 1,000 miles away where the court of appeals found that my
21 due process was violated. Even though Court of Appeals **ORDERDE** an
22 immediate visitation schedule set with my son back in August of 2019,
23 Burrow and her attorneys and district Court Judge has have conspired
24 to violate my rights and deny my visitations time after time interfering
25 with my parental rights which under Federal law a serious matter.

COA Writs #'s -78771, 79336, 79992, 80277, 80447, 81218, 81791(7 total writs of mandamus) speak for themselves in this combined case.

Shahrokhi now has a new writ of mandamus pending under case # 82803 which is most likely to be granted, I have done serious research and in the entire Supreme Court of Nevada history have not been able to find/locate 2 writs of mandamus being GRANTED to the same litigant in the same case. IF THAT DOES NOT RAISE SERIOUS CONCERNS, I am not sure if anything else does. (Please read this TWICE)

Conclusion

We come to courts based on FACTS and LAWS. Not speculations or assumptions. Shahrokhi has presented beyond clear and convincing under NARP Rule 32 that each appeal is entitled to maximum of 30 pages limit per brief.

Per NARP 14(4), it is the parties' brief that will determine the final issues on appeal and Shahrokhi is entitled to get same amount of pages per other appellants per brief, not to have a combined appeal and less paper space.

Since there are 2 combined cases in this appeal, under NRAP Rule 32(7)(a)(i), Shahrokhi will be entitled to up to 60 pages maximum for both combined briefs/cases.

Shahrookhi ask this court for the following relief:

1) An ORDER granting extension of the 92 pages for both combined briefs as Shahrokhi had originally requested;
Or in the alternative;

2) An ORDER granting maximum of 60 pages for both combined briefs which Shahrokhis entitled to per NARP 32 Rule.

Entered in this action on the 1st day of June, 2021

DocuSigned by:

Ali Shahrokhi

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Las Vegas, NV 89141
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In Proper Person

AFFIDAVIT of Ali Shahrokhi

My name is Ali Shahrokhi. I am a litigant before the court. All of the allegations herein are true and correct of my own personal knowledge. If called upon to testify, I could and would give competent and truthful evidence. I hereby declare under penalty of perjury under the laws of the State of Nevada the foregoing is both true and correct.

Dated: June 1st, 2021

DocuSigned by:

Ali Shahrokhi

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Ali Shahrokhi

Declarant.

-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 **June 1st, 2021**, I served the following:

"Motion for Reconsideration/Review"

On an interested party in the above-entitled action by
☒ via e-mail transmission,
☐ personal service on the person below listed,
☒ depositing it in the U.S. Mail, postage prepaid,
and addressed to the person below listed,
☐ overnight delivery, addressed as follows:

**Vincent Ochoa, District Court Judge
601 N. Pecos Rd.
Las Vegas, NV 89101
Yvonne Ruiz (E-Served)
170 S Green Valley Pkwy. #300
Henderson, NV 89012**

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

Dated: **June 1st, 2021.**

DocuSigned by:
Ali Shahrokhi
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Ali Shahrokhi