

FILED

JUN 30 2022

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

ALI SHAHROKHI
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Self-Represented Plaintiff

NEVADA SUPREME COURT

STATE OF NEVADA

| | |
|--------------------|------------------------------|
| Ali Shahrokhi |) Appeals Ct: 81978, 82245 |
| |) District Ct: D-18-581208-P |
| |) |
| <i>Appellant,</i> |) APPELLANT'S MOTION |
| |) to STAY the REMITTITUR |
| vs. |) PENDING APPLICATION |
| |) to U.S. SUPREME COURT. |
| Kizzy Burrow |) |
| |) |
| <i>Respondent.</i> |) |
| |) Dept. U, Dawn Throne |

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Appellant's Motion to Stay Remittitur Pending Application to U.S. Supreme Court, p. 1

22-20706

I. PROCEDURAL HISTORY—

Order of Affirmance: On May 12, 2022, this Court entered an *Order of Affirmance* on Appellant's appeal, [Case #'s 81978, 82245].

Petition for Re-Hearing Denied: On June 29, 2022, Appellant's *Petition for Rehearing* was *DENIED*, [Case #'s 81978, 82245].

II. MOTION TO STAY REMITTITUR—

Motion to Stay Remittitur: "A party may file a motion to stay the remittitur pending application to the Supreme Court of the United States for a writ of certiorari," [NRAP, Rule, 41(b)(3)(A)].

Stay Shall Not Exceed 120 Days: As per the Rules, a stay of remittitur shall not exceed 120 days, [NRAP, Rule, 41(b)(3)(B)]. Appellant seeks a stay of 120 days—pending his application to the U.S. Supreme Court.

Writ of Certiorari: This Court ruled against Appellant on May 12, 2022; *therefore*, Appellant's last day to file his writ of certiorari is Aug. 10, 2022.

III. OVERLOOKED & MISAPPREHENDED—

Unresolved Issues of First Impression: This Court overlooks and misapprehends fundamental due process issues now ripe for resolution—

- May one party to a civil case bring a criminal cause-of-action against the other? (No!—of course, not.)
- May a district judge ignore appellant's pre-trial objection raising jurisdictional defects?
- May State of Nevada Violate Appelleant and his son's Firts Amendment rights to private speech, rright to practice religioun, right to personally educate his son, right to familial association, under the corrupt state's "best interest" Statute?

- May a state “best interest” statute trump appellant’s constitutional rights to **FIRST AMENDMENT RIGHTS?**
- May a bottom feeder so called judge commit perjury under penalty of perjury and be caught and refuse to **RECUSE?**

There is no private right of action to allege crimes in a civil case. No district judge may conclude that a parent committed a crime—unless or until The People bring a criminal complaint, [NRS 172.015; (“[e]very public offense must be prosecuted by indictment or information”)]. The criminal complaint is what confers subject-matter jurisdiction for the judge to make criminal findings and conclusions—and The People are the only entity who may bring criminal complaints—and Burrow, most certainly, is *not* The People.

CONCLUSION:

Shahrokhi demands this Court stay the remittitur pending the application to United States of America in case # 81978 and case # 82245.

Dated: **June 30, 2022**

DocuSigned by:
Ali Shahrokhi
ED43B0CA76FC4D6...

Ali Shahrokhi

*Ali Shahrokhi,
Appellant*

* * *

AFFIDAVIT of ALI SHAHROKHI

My name is ALI SHAHROKHI. I am the Appellant. All facts herein alleged are true and correct of my own personal knowledge. And as to those matters alleged on information and belief, I reasonably believe them to be true.

I hereby declare under penalty of perjury pursuant to the laws of Nevada, the foregoing is both true and correct.

Dated: **June 30, 2022**

DocuSigned by:
Ali Shahrokhi
ED43B0CA76FC4D6...

Ali Shahrokhi
Ali Shahrokhi,
Affiant

CERTIFICATE-OF-SERVICE

I am an individual over the age of eighteen and not a party to the within action. My business address is 9620 S. Las Vegas Blvd Suite 4, #152, Las Vegas, Nev. 89123. My phone number is (702) 835-3558 On **June 30, 2022**, I served the following:

Appellant's Motion to Stay Remittitur Pending Application to U.S. Supreme Court;

on an interested party in the above-entitled action by

 X via e-mail transmission, (Taylor Host)

 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:

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

Dated: **June 30, 2022**

DocuSigned by:

ED43B0CA76FC4D8...
/s/ Ali Shahrokhi.
Declarant.