

FILED

APR 15 2021

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

1 Ali Shahrokhi  
2 10695 Dean Martin Dr. #1214  
3 Las Vegas, Nev. 89141  
4 Tel: (702)835-3558

5 *Appellant in Propria Persona*

6  
7 **IN THE SUPREME COURT OF THE STATE OF NEVADA**  
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9

10	_____	)	Case No: 81978
11	<b>ALI SHAHROKH</b>	)	
12		)	
13	<i>Appellant,</i>	)	APPELLANT'S
14		)	REQUEST for JUDICIAL NOTICE
15	<b>vs.</b>	)	
16		)	
17	<b>KIZZY BURROW</b>	)	
18		)	
19	<i>Respondent.</i>	)	
20	_____	)	

21 Notice to Respondent: *You are required to file a written response to this*  
22 *motion with the Clerk of the Court and to provide the undersigned with a copy*  
23 *of the response within fourteen (14) day of your receipt of this motion. Failure*  
24 *to file a written response with the clerk of the court within fourteen (14) days of*  
25 *your receipt of this motion may result in the request relief being granted by the*  
26 *court without hearing prior to the scheduled hearing date.*  
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21-109605

**NOTICE of MOTION**

**PLEASE TAKE NOTICE:** Respondent asks the Court to take judicial notice of NRS 33.020 (2)(4)(5) and NRS 33.080(3).

**NRS 33.020 Requirements for issuance of temporary and extended orders; availability of court; court clerk to inform protected party upon transfer of information to Central Repository.**

1. If it appears to the satisfaction of the court from specific facts shown by a verified application that an act of domestic violence has occurred or there exists a threat of domestic violence, the court may grant a temporary or extended order. A court shall only consider whether the act of domestic violence or the threat thereof satisfies the requirements of NRS 33.018 without considering any other factor in its determination to grant the temporary or extended order.

2. A temporary or extended order must not be granted to the applicant or the adverse party unless the applicant or the adverse party has requested the order and has filed a verified application that an act of domestic violence has occurred or there exists a threat of domestic violence.

3. The court may require the applicant or the adverse party, or both, to appear before the court before determining whether to grant the temporary or extended order.

4. A temporary order may be granted with or without notice to the adverse party. An extended order may only be granted after notice to the adverse party and a hearing on the application.

5. A hearing on an application for an extended order must be held within 45 days after the date on which the application for the extended order is filed. If the adverse party has not been served pursuant to NRS 33.060 or 33.065 and fails to appear at the hearing, the court may, upon a showing that law enforcement, after due diligence, has been unable to serve the adverse party or that the adverse party has sought to avoid service by concealment, set a date for a second hearing which must be held within 90 days after the date on which the first hearing was scheduled.

**NRS 33.080 Expiration, conversion, modification and dissolution of order; hearing; court to enter findings of fact concerning extended order effective for more than 1 year; construction of section not to affect right of adverse party to interlocutory appeal.**

1. A temporary order expires within such time, not to exceed 45 days, as the court fixes. If an application for an extended order is filed within the period of a temporary order or at the same time that an application for a temporary order is filed, the temporary order remains in effect until:

(a) The hearing on the extended order is held; or

(b) If the court schedules a second or third hearing pursuant to subsection 5 or 6 of NRS 33.020, the date on which the second or third hearing on an application for an extended order is held.

2. On 2 days' notice to the party who obtained the temporary order, the adverse party may appear and move its dissolution or modification, and in that event the court shall proceed to hear and determine such motion as expeditiously as the ends of justice require.

3. An extended order expires within such time, not to exceed 2 years, as the court fixes. A temporary order may be converted by the court, upon notice to the adverse party and a hearing, into an extended order effective for not more than 2 years.

**Scope of Motion:** This motion is based on this notice of motion, the within points & authorities, affidavits, exhibits, requests for judicial notice, oral arguments, *etc.*, and other evidence as the Court may allow.

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Dated: April 14, 2021

Authentisign

*Ali Shahrokhi*

4/15/2021 8:02:41 AM PDT

**ALI SHAHROKHI**

*Petitioner, in Propria Persona*

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**REQUEST FOR JUDICIAL NOTICE—**

Request for Judicial Notice: In this case, grave injustice stems from the perjury and bankruptcy fraud and conspiracy to commit mortgage fraud Mathew Harter has committed while sitting on the bench as family court judge.

**GOVERNING LAW—**

Judicial Notice: NRS 47.140 governs requests for judicial notice as to “matters of law.” NRS 47.140 provides the governing law—

NRS 47.140 MATTERS OF LAW—

“The laws subject to judicial notice are:

1. [ ... ]

2. The Constitution of United States.

3. Any other statute of this State if brought to the attention of the court by its title and the day of its passage.”

[See NRS 47.140; underscores added.]

Nevada Revised Statutes: Pursuant to NRS 47.140(2), courts may properly take judicial notice of *Nevada Revised Statutes*, including, of course, NRS 126.036, [see NRS 47.140(2)].

**ORDERS EXCEEDING JURISDICTION:**

An order that exceeds the jurisdiction of the court is VOID. And can be aatcked in any proceeding in any court where the validity of the judgment comes into issue. (See Rose v. Himely (1808) *VOID ORDERS CAN BE ATTACKED ANY TIME*.

**NO OPPOURTUNITY to BE HEARD:**

A Judgment of a Court without hearing the party of giving him an oppourtunity to be heard is not ajudicial determination of his rights. Sabariego v. Maeverick, 124 US 261, 31 L Ed 430, 84 L ed 370; Ex Parte Rowland (1882) 104 U.S. 604, 26 L.Ed. 861:

**SUMMARY & CONCLUSION—**

**SUMMARY** : Plaintiff respectfully requests that this Court *GRANT* this Request for Judicial Notice. The facts sought to be noticed are not subject to reasonable dispute, and further, such facts are capable of accurate verification from sources whose accuracy cannot reasonably be questioned.

In the “NO CONTACT ORDER” with Kizzy Burrow, Bottom Feeder Mathew Harter, District Judge continues his violation of Shahrokhi’s Constitutional rights. Harter is a criminal who is still presiding over a bench, acting under color of law abusing litigants and **BOLDY** violating litigants constitutional rights, issuing VOID ORDERS, just because he can and no one has Stopped him. His behavior violating Shahrokhi’s has gone out the entire time of this case, and now we know a criminal that lies in his BK fillings and commits perjury, has NO PROBLEM violating constitution, and litigant’s protected rights in his Court room. **Nevada Judiciary, SHMAE ON YOU....THIS MUST STOP!**

**CONCLUSION:**

No Contact order for Kizzy Burrow is defective and it is in violations of Shahrokhi’s constitutional rights under due process. Shahrokhi has reached out many times for relief but the corrupt criminal Mathew Harter who has been wrongfully named as a judge for Department N, Family Court, Clark County Nevada has ignored the higher courts directives and acted as the **ANIMAL** that he is. (A criminal on the bench acting as a judge....**ONLY in NEVADA**) Burrow has NEVER filed a petition requestion restraining order in court room N, Shahrokhi has never been given notice what those allegatiosn were and no hearing was EVER set to give Shahrokhi to defend the allegations and MOST Importatntly

1 a no contact order without expiration date is **VOID**, it is in excess of statute and  
2 jurisdiction, due process has been violated and the order has no legal standing.  
3 Shahrokhi demands this Court to Immediatley issue a ORDER striking such  
4 ORDER to be VOID as it is **UNCONSTITUTIONAL**.

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7 Dated: April 14th, 2021

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9 Respectfully Submitted,

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11 Authentisign  
***Ali Shahrokhi***  
4/15/2021 8:02:42 AM PDT

12 **Ali Shahrokhi**

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14 *Respondent, in Propria Persona*  
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*Steven D. Grierson*

**ORDER**

THOMAS J. STANDISH, ESQ.  
Nevada Bar No. 1424  
tom@standishlaw.com  
CARLIA WAITE, ESQ.  
Nevada State Bar No. 8915  
carlia@standishlaw.com  
STANDISH LAW GROUP  
1635 Village Center Circle, Suite 180  
Las Vegas, Nevada 89134  
Tele: (702) 998-9344  
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*Attorneys for Plaintiff*

↓ ↓ ↓  
"" THIS ORDER IS VOID"

NO APPLICATION BEFORE THE COURT

NO NOTICE TO THE DEFENDANT

VIOLATION OF SHAHROKHI'S DUE PROCESS

AND. NOOOOO EXPIRATION DATE

"WHAT A JOKE...ORDER SIGNED BY CRIMINAL HARTER"

**DISTRICT COURT, FAMILY DIVISION**

**CLARK COUNTY, NEVADA**

\* \* \*

KIZZY BURROW,

Plaintiff,

vs.

ALI SHAHROKHI,

Defendant.

CASE NO: D-18-581208-P

DEPT. NO.: N

"ONLY IN STATE OF NEVADA THAT

CONSTITUTION DOES NOT EXIST"

I AM GOING TO PUT AN END TO ALL  
OF THIS NONSENSE "

**NO CONTACT ORDER**

This matter having come before this Court on July 11, 2019 at 10:00 a.m., for hearing on all pending motions, Plaintiff, KIZZY BURROW ("Kizzy"), present and represented by THOMAS J. STANDISH, ESQ., of the STANDISH LAW GROUP, and Defendant, ALI SHAHROKHI ("Ali"), present and appearing in Proper Person, and the Court having reviewed the pleadings filed herein, being fully advised in the premises and good cause appearing, makes the following orders:

**THE COURT HEREBY ORDERS THAT** Defendant, ALI SHAHROKHI, shall have NO CONTACT with Plaintiff, KIZZY BURROW. This applies to both direct and indirect contact, including but not limited to contact or communication that is face-to-face, by telephone, mail, electronic-mail (e-mail), social media, voice mails, text messages, Our Family Wizard and other messaging services, as well as perform

any of the above through any third party or other entity. ALI SHAHROKHI shall not go to or loiter around any place where KIZZY BURROW frequents, works, or resides, nor shall ALI SHAHROKHI do anything to stalk, harass, intimidate, threaten, or cause injury to KIZZY BURROW. ALI SHAHROKHI shall not contact KIZZY BURROW'S place of employment by any means whatsoever.

**THE COURT FURTHER ORDERS THAT** Defendant, ALI SHAHROKHI, shall have no contact with the parties' minor child, BENNETT ETHAN SHAHROKHI. This applies to both direct and indirect contact, including but not limited to contact and communication that is face-to-face, by telephone, mail, electronic-mail (e-mail), social media, voice mails, text messages, Our Family Wizard and other messaging services, as well as perform any of the above through any third party or other entity. ALI SHAHROKHI shall not go to or loiter around any place where BENNETT ETHAN SHAHROKHI frequents, goes to school, or resides, nor shall ALI SHAHROKHI do anything to stalk, harass, intimidate, threaten, or cause injury to BENNETT ETHAN SHAHROKHI. ALI SHAHROKHI shall not contact BENNETT ETHAN SHAHROKHI'S school by any means whatsoever.


DATED this 16<sup>th</sup> day of July, 2019.

  
DISTRICT COURT JUDGE

Respectfully submitted this 15<sup>th</sup> day of July, 2019.

STANDISH LAW GROUP

by:

  
THOMAS STANDISH, ESQ.  
Nevada State Bar No. 1424  
PHILIP SPRADLING, ESQ.  
Nevada State Bar No. 13590  
1635 Village Center Circle, Ste. 180

"CLEAR SIGN OF CONSPIRACY BETWEEN  
STANDISH LAW FIRM who has BOLDY

Committed PERJURY to this Court and

Criminal HARTER who has committed

PERJURY, BK FRAUD, and MORTGAGE FRAUD



Las Vegas, NV 89134  
Tel: (702) 998-9344  
*Attorneys for Plaintiff*

**"THIS IS AN UNCONSTITUTIONAL ORDER"**

**HAS ZERRRRRO LEGAL STANDING**

**THIS IS A BEHAVIOR HARTER HAS SHOWCASED...HE THINKS HE IS  
ABOVE THE LAW.....WELL we know he is a CRIMINAL and shame on this  
court calling him a JUDGE.....**

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: April 14th, 2021

Authentisign  
**Ali Shahrokhi**  
4/15/2021 8:02:43 AM PDT

**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 **April 14th, 2021**, I served the following:

**Respondent'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:

**Yvonne Ruiz, Esq  
Eserved-**

**Mathew Harter  
601 N Pecos Rd  
Las Vegas, NV 89101**

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

Dated: **April 14th, 2021**

/s/ Ali Shahrokhi  
Declarant.

Authentisign  
**Ali Shahrokhi**  
4/15/2021 8:02:45 AM PDT