

FILED

MAY 11 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
5 Alibe76@gmail.com
6 In Proper Person

IN THE SUPREME COURT OF NEVADA

7 ALI SHAHROKHI,
8 Appellant,

9 vs.

10 KIZZY BURROW,
11 Respondent.

) Case No.: 81978; 82245

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

12 **MOTION FOR ORDER GRANTING EXPANSION OF PAGES FOR**
13 **FAST TRACK BRIEF (combined appeals)**

14
15 ALI SHAHROKHI ("ALI"), in proper person, respectfully requests that
16 this court issue an order granting him permission to file his Emergency Motion
17 for Stay which exceeds the NRAP 27 (d)(2) page limit of 30 pages.

18 DATED this 10th day of May, 2021.

DocuSigned by:

Ali Shahrokhi

1E3FF1A4645B4B2...

19 Ali Shahrokhi
20 10695 Dean Martin Dr. #1214
21 Las Vegas, NV 89141
22 (702) 835-3558
23 Alibe76@gmail.com



DECLARATION OF ALI SHAHROKHI

I ALI SHAHROKHI declare under penalty of perjury

(1) My child custody/paternity case has a record of approximately 4,000 pages. I have had no visitation with my son in 22 months. My case involves multiple writs where one, the orders were remanded and the judge never followed the writ, which is why I still have not seen my son on over 600 days and have not been afforded even one visitation with him.

(2) On August 6, 2019 an attorney, I hired, Bruce Shapiro, Esq., who filed a Petition for writ of mandamus. That petition was 60 pages long, encompassing 8 months of proceedings. That was over a year ago and the issues have continued to be even more extensive and, the errors have multiplied in the 18 months since that petition was filed.

(3) I am in proper person, and I'm not an attorney, neither is my native language English. What took 60 pages for Bruce Shapiro would likely have taken me 80 pages, yet this court accepted the 60 page petition for writ from a licensed Nevada attorney, I hope I am not discriminated against for being in proper person regarding the exhaustive amount of information that must be reviewed by this court.

1 (4) Additionally, my brief combines two separate appeals,
2 one from the three day trial commencing on 9/21/2020 and the
3 other appeal was a post judgement motion.

4 (5) Moreover, I was tried for crimes, in civil proceedings.
5 This was what took me so long to research and understand. The
6 issues in this case are egregious and my rights to parent were
7 stripped without following procedures in NRS 128. My son was
8 relocated 1,000 miles away where the court of appeals found
9 that my due process was violated.

10 (6) I tried my very best to keep the brief as short as I could
11 and I still fear I didn't get enough information before the court.

12 (7) My Appellate brief is 92 pages long. It's like a book. I
13 wish it wasn't so long and again, I fear everything wasn't
14 covered in getting me the relief I need.

15 (8) I have tried to conform to your requirements, please
16 forgive me if I did not meet your standards. I did my very best.
17 For my son.

18 (9) I do believe, considering an attorney needed 60 pages
19 to cover 8 months of proceedings, that my request for an
20 additional 32 pages (from what the attorneys needed) to cover 22
21 months of proceedings is a reasonable request. I come to you in
22 good faith and in hope for relief desperately needed.
23
24
25
26
27
28

1 (10) I ask for this court to grant me the additional 62 pages
2 needed, where the total length of my brief is 92 pages. If my
3 request for additional pages is not granted then I ask sufficient
4 time to re-write the fast track brief in 30 days.

5 DATED this 10th day of May, 2021.

DocuSigned by:
Ali Shahrokhi
1E3FF1A4645B4B2...

7 Ali Shahrokhi
8 10695 Dean Martin Dr. #1214
9 Las Vegas, NV 89141
10 (702) 835-3558
11 Alibe76@gmail.com

CERTIFICATE OF COMPLIANCE

1. I hereby certify that this fast track statement complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because:

☒ This fast track statement has been prepared in a proportionally spaced typeface using [Microsoft Word] in [13 point font in Century Schoolbook Mono]; or

☐ This fast track statement has been prepared in a monospaced typeface using [state name and version of word-processing program] with [state number of characters per inch and name of type style].

2. (I am requesting to increase these conditions so I have not chosen an option here)

My brief is 2,640 lines long and approximately double the allotted 1300 lines in fast track briefs

DATED this 10th day of May, 2021.

DocuSigned by:
Ali Shahrokhi
1E3FF1A4645B4B2...

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

VERIFICATION

I declare under penalty of perjury that I have read this motion, that the information provided in this motion 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

5/10/2021

Date

Signature of counsel of record

Nevada, Clark County

State and county where signed

CERTIFICATE OF SERVICE

I certify that on the 10 day of May, 2021, I served a copy of this completed motion 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.)

Eighth Judicial District Court
Judge Vincent Ochoa, Dept. S
601 N. Pecos Rd.
Las Vegas, NV 89101

Yvonne Ruizz, Esq.
170 S. Green Valley Pkwy.
Suite 300
Henderson, NV 89012

Dated this 10 day of May, 2021

DocuSigned by:

Ali Shahrokhi

1E3FF1A4845B4B2...

Signature