

IN THE SUPREME COURT OF THE STATE OF NEVADA

ALI SHAHROKHI,

Appellant,

VS.

KIZZY BURROW,

Respondent.

District Court Case # D-18-581208-P  
Supreme Court Case # 81978

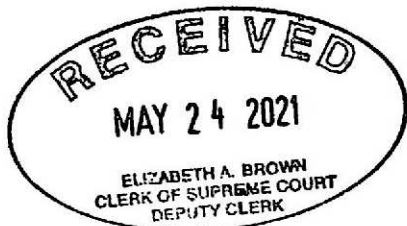
**FILED**

**MAY 24 2021**

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY S. Young  
DEPUTY CLERK

**“Appellant’s Reply to Respondent’s Response to Motion for Order Granting Expansion of Pages for Fast Track Brief. (Combined Appeals) Nos. 81978/82245 (SC)”**

COMES NOW, Petitioner, Ali Shahrokhi, appearing in Proper Person, hereby moves to address the Supreme Court Justices for an ORDER granting expansion of pages for fast track brief.



## **POINTS AND AUTHORITIES**

The issues in this case involve child custody and are submitted to this Court For violations of Shahrokhi's substantive rights, procedural due process rights, lack-of subject matter jurisdiction to infringe on Shahrokhi's fundamental liberty rights associated with First Amendment rights, Minor's mirroring rights violation by the Court and Burrow and her entire legal team that is UNHEARD of. There has been unlimited amount of willful judicial misconduct by the lower court judge, Burrow and her attorneys, serious abuse of process, complete malicious prosecution and conspiracy to kidnap the minor to State of Oregon to live with a drug dealer who is Burros boyfriend and perjury right before this court and now a Honeycutt motion pending for fraud upon the Court by Burrow an her entire legal team.

Shahrokhi is also challenging Nevada's Custody and relocation Statutes constitutionality and since there is Strict Scrutiny requirements, the burden actually shifts on the state of a Nevada to prove on the Records why the statutes are valid, therefore as of right now the presumption is Nevada Custody and relocation statutes are "INVALID".

On 8/6/2019, Bruce Shapiro. Esq , filed an emergency writ of mandamus on behalf Shahrokhi, case # 79336, Shapiro is considered a very skilled and highly

respectful attorney in Nevada to get a good picture of every thing that was going wrong 2 years ago, it was a 60 pages writ of mandamus.

2 years has gone by and so much misconduct and violation of constitution and pattern of willful legal errors has happened in this case that it is IMPOSSIBLE to explain all of that to this honorable court. Ruiz who is just a front man (Strawman) for Standish law firm claims my request should be denied as her and Standish law firm and Burrow are desperately running around trying to limit Shahrokhi's access to the court so their exposure to all the misconduct is wrapped under a rug and mitigated, however Ruiz has no place to make such arguments as Ruiz and Standish have committed perjury so boldly right in front of this honorable court that even revocation of their law licenses is not enough, no thought or consideration should be to fraudulent lawyers that commit perjury in this court.

This case includes significant error throughout proceedings, which is clear in the record where ALI was granted a writ because his rights were violated. In subsequent petitions for writ the rulings were basically deferred because a trial was to take place soon, which would allow ALI an appeal.

Shahrokhi is not litigating the whole case, the interlocutory orders are within scope of this appeal and ALI has a right to argue for this Superior Court to review them, where they clearly have authority to do such. Prior interlocutory orders included within scope. Where a timely appeal is taken from a final judgment or other appealable order, the interlocutory judgments, orders and rulings that were

not independently appealable when they were made and/or entered prior to final judgment can be reviewed on the appeal from the final judgment or other appealable order. *See Consolidated Generator v. Cummins Engine Co.*, 114 Nev. 1304, 1312, 971 P.2d 1251, 1256 (1998). Consequently, such interlocutory, non appealable judgments, orders and rulings need not be separately listed in the notice of appeal to be reviewed by the appellate court. *See id.*

As far as the timeline is concerned. I am not an attorney and I am trying my best, our country has been in a state of emergency during the pandemic and I have had a death in the family. As I was trying to reduce the size of my brief, I found relevant information that I believed would be helpful to the Supreme Court. In such I did file some notices. This case is overwhelming and the integrity of the lower court and this court have been violated by fraud brought by Burrow and her attorneys. That in parallel with a bias judge, I have been in the fight of my life to reunite with my child, where my rights to my child were not protected but rather violated over and over again. The bias in this case was to such an extreme that the judge acted outside of his authority granted by the state in holding trial on crimes I never noticed that I would be tried for, where no charges were brought about by the executive branch in a clear violation of the Nevada Constitution.

Burrow is desperately swinging in every direction because she has been caught red handed lying to this very court and omitting material evidence that

would have changed the course of the litigation. There is also a writ regarding department assignment pending right now in the underlying case. The motion to extend the deadline, I didn't know what to do when it was not adjudicated. I didn't know if I was allowed to file or not. After so much time passed, I went ahead and filed my brief.

It is also worth to acknowledge one more time, Yvonne Ruiz, is just a front (Strawman) for Standish law firm, who is still ghost writing all these legal briefings and having Ruiz file it under her name. It is impossible for Ruiz, who is a rookie attorney to fully understand 4100 pages of filed legal documents in less than 16 days to represent Burros in this appeal without any outside help.

A further search on the Supreme Courts site verifies, Ruiz has had less than 3 cases ever arguing before this court, and Since Burrow states she has spent well over \$186,000 in the lower Courts litigation by a charlatan attorney such as Standish, the Justice of Supreme Court should have serious concern why suddenly bring a super rookie lawyer on board within 16 days to represent your complicated issues where as most definitely Burrow will be ordered to return the minor to the State of Nevada immediately and remand the entire case for new trial.

This honorable Court on 4/28/2021 issued an ORDER for writ of mandamus In case # 81752, Slazar (Diego) v. District Ct (State), and release a prisoner based on the judicial misconduct of the trial court, well Supreme Court is going to be

shocked by amount of willful judicial misconducts by the lower court judge and burrow and entire legal team aka Standish law firm. It is an underestimate to say it has been just a few, Shahrokhi's and his minor son's constitution rights not only have been violated with by Burrow, the judge and Burrow's lawyers, they continue to participate and conspire to carry on the misconducts and malicious prosecution and abuse of process in hope they can stop Shahrokhi's access to the court s so they mitigate their damages.

Lets be very serious here, Shahrokhi has won a Writ of Mandamus for the same issues in case # 79336, Shahrokh is most definitely to be granted another writ of mandamus in case # 82803, and Shahrokhi has nothing but clear and convincing evidence to prove perjury committed by Thomas Standish, Philip Spardling and Fraud brought upon the Court by Burrow, her boyfriend and Yvonne Ruiz as the strawman.

Shahrokhi demands his constitutional rights to be protected as the jub of any court is to uphold the constitution of the U.S. and apply the proper law, however such does not exist in family court. Therefore this Court MUST grand the expansion of the pages to fully understand all issued and misconducts involve in this case to protect Shahrokhi and his minors son's constitutional rights given to them by God and nature and not the state of Nevada.

**Dated** this 23<sup>rd</sup> of May, 2021

DocuSigned by:  
*Ali Shahrokhi*  
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Ali Shahrokhi

In proper person

10695 Dean Martin Dr. #1214

Las Vegas, NV 89141

### **Verification**

I, Ali Shahrokhi, declare that I have read the foregoing *Petition*, and know the content thereof; that the same is true of my own knowledge except for those matters therein stated on information and belief, and as to those matters, I believe them to be true. Those factual allegations contained in the referenced filing are incorporated here as if set forth in full.

***I declare under penalty of perjury that the foregoing is true and correct.***

EXECUTED this 23rd day of May, 2021

DocuSigned by:  
*Ali Shahrokhi*  
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Ali Shahrokhi

### Certificate of Service

I, Ali Shahrokhi, do hereby declare that I am over the age of 18 and a party to this action, and that I have placed a true and correct copy of this *Petition* into a sealed envelope and mailed it, postage prepaid, *via* United States Postal Service, addressed as follows:

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

Yvonne Ruiz, esq (E-Served)  
170 S. Green Valley Pkwy.  
Suite 300  
Henderson, NV 89012

DocuSigned by:  
*Ali Shahrokhi*  
1E3FF1A4645B4B2...

SERVED THIS 23rd day of May, 2021.

Ali Shahrokhi,

In Proper Person