

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

5 *Appellant in Propria Persona*

FILED

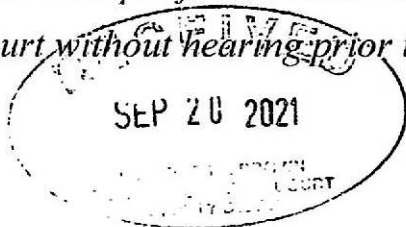
SEP 20 2021

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

IN THE SUPREME COURT OF THE STATE OF NEVADA

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

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



21-27141

PLEASE TAKE NOTICE: Respondent asks the Court to take judicial notice of certain facts in case # D-18-581208-P;

“Page 2, item # 2—That Parties were NEVER married.”

“Pursuant to NRS 125.110(2), NRS 125 is for dissolution of marriage and does not apply to a paternity case”

“On 2/1/2019 citing on his Order NRS 125.110 specifically for Divorce cases ONLY, where the judge knows this is not a divorce case”. (See Exhibit C)

Dated: September 20, 2021

DocuSigned by:
Ali Shahrokhi
D3A5D2A2AABB408...

ALI SHAHROKHI

in Propria Person

-REQUEST FOR JUDICIAL NOTICE-

Request for Judicial Notice: In this case, grave injustice stems from the perjury and bankruptcy fraud and conspiracy to defraud the state courts and federal courts by Burrow and her attorneys. Burrow's entire relocation request was presented to the court with her lies that her lie and the minor's life will be substantially improved and her boyfriend had a significant to support Burrow. We now fully know it was all lies and perjury. You can NOT tell family Courts life is amazing and then go to federal courts and claim you have \$0 to your name. Which story is the true story? Both can NOT be ture!

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)].

////

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.

Dated: September 20, 2021

DocuSigned by:
Ali Shahrokhi
D3A5D2A2AABB408...
Respectfully Submitted,

Ali Shahrokhi

in Propria Person

///
///
///

-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 **September 20, 2021**, I served the following:

Shahrokhi'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:

**Kizzy Burrow
1500 SW 11th Ave. #804
Portland, Oregon 97201**

**Dawn Throne, Department U
200 Lewis Ave.
Las Vegas, NV 89155**

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

Dated: **September 20, 2021**

/s/ Ali Shahrokhi
Declarant.

EXHIBIT A

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12/10/2018 4:56 PM
Steven D. Grierson
CLERK OF THE COURT

Steven D. Grierson

1 **CMPS**
2 **THOMAS J. STANDISH, ESQ.**
3 Nevada Bar No. 1424
4 tom@standishlaw.com
5 **LIANNA L. URFALYAN, ESQ.**
6 Nevada Bar No. 14636
7 lianna@standishlaw.com
8 Standish Law Group
9 1635 Village Center Circle, Suite 180
10 Las Vegas, Nevada 89134
11 Tele: (702) 998-9344
12 Fax: (702) 998-7460
13 *Attorneys for Plaintiff*

8 **DISTRICT COURT, FAMILY DIVISION**
9 **CLARK COUNTY, NEVADA**

10 **KIZZY BURROW,**
11 **Plaintiff,**

12 **vs.**

13 **ALI SHAHROKHI,**
14 **Defendant.**

CASE NO: D-18-581208-P

DEPT. NO.: N

15 **COMPLAINT TO ESTABLISH PATERNITY, CHILD CUSTODY,**
16 **VISITATION, AND CHILD SUPPORT**

17
18 COMES NOW Plaintiff, KIZZY BURROW (hereinafter "Mother"), by and
19 through her counsel of record, THOMAS J. STANDISH, ESQ., of the STANDISH
20 LAW GROUP, as and for her Complaint to Establish Paternity, Child Custody,
21 Visitation, and Child Support against Defendant, ALI SHAHROKHI (hereinafter
22 "Father"), alleges as follows:

23 1. That Mother, for a period of more than six (6) weeks immediately
24 preceding the commencement of this action has been, and now is, an actual, bona fide
25 and actual resident and domiciliary of the State of Nevada, County of Clark, and has
26 been actually physically and corporeally present and domiciled in Nevada for more
27 than six (6) weeks immediately prior to the commencement of this action, and has had
28

STANDISH LAW GROUP
1635 Village Center Circle, Suite 180 Las Vegas, NV 89134
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1 and still has the intent to make the State of Nevada her home, residence and domicile
2 for an indefinite period of time.

3 2. That the parties were never married.

4 3. That there is one (1) minor child issue of the parties' former relationship,
5 to wit: BENNETT ETHAN SHAHROKHI, born May 1, 2009, age 9. No children
6 were adopted by Mother and/or Father and Mother is not currently pregnant.

7 4. That the State of Nevada is the home state of the subject minor child.

8 5. That this Court has the necessary UCCJEA jurisdiction to enter orders
9 regarding custody, visitation and child support.

10 6. That Father has acknowledged and confirmed that he is the biological
11 father of the subject minor child, BENNETT ETHAN SHAHROKHI, and is identified
12 as the biological father on the child's birth certificate.

13 7. That no court has entered an order regarding paternity, custody, visitation
14 or child support for the subject minor child.

15 8. That Mother is a fit and proper person to be awarded sole legal custody
16 of the minor child.

17 9. That Mother is a fit and proper person to be designated as the primary
18 physical custodian of the minor child, subject to Father's reasonable supervised
19 visitation.

20 10. That child support for the minor child of this relationship should be set in
21 accordance with the provisions of NRS 125B.070 and NRS 125B.080 until said child
22 reaches the age of majority, marries, or becomes otherwise emancipated.

23 11. That the parties should continue to maintain medical, optical, and dental
24 insurance for the minor child, until said child reaches the age of majority, marries, or
25 becomes otherwise emancipated, with any premium being paid equally by both
26 parties.

27 12. That the parties should equally share all unreimbursed medical expenses
28 of the minor child, including but not limited to medical, dental, optical, orthodontic,

1 and psychological expenses. Reimbursement should be made pursuant to the 30/30
2 rule for such unreimbursed expenses, to wit: the party incurring such unreimbursed
3 medical expenses submits, in writing and accompanied by a copy of any receipt for
4 same, a request for reimbursement to the other party within thirty (30) days of
5 incurring such an expense, and the party receiving the request for reimbursement has
6 thirty (30) days from the day he/she receives the written request for reimbursement to
7 tender the same to the requesting party.

8 13. That Mother has been required to retain the services of the Standish Law
9 Group to prosecute this action and should be awarded her reasonable costs, expenses
10 and attorney's fees incurred herein.

11 WHEREFORE, Mother prays for Judgment as follows:

12 1. That the Court enter an order for paternity, child custody, visitation and
13 child support as stated in this Complaint;

14 2. That Mother be awarded sole legal custody of the minor child;

15 3. That Mother be awarded primary physical custody of the minor child;

16 4. That child support be set in accordance with the provisions of NRS
17 125B.070 and NRS 125B.080;

18 5. That Mother be awarded her reasonable attorney's fees and costs incurred
19 herein; and

20 6. For such other relief as the Court finds to be just and proper.

21
22 DATED this 10th day of December, 2018.

23 By:

24  #14036
25 per

26 THOMAS J. STANDISH, ESQ.
27 Nevada State Bar No. 1424
STANDISH LAW GROUP
1635 Village Center Circle, Ste. 180
28 Las Vegas, NV 89134
Email: tom@standishlaw.com
Attorneys for Plaintiff

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VERIFICATION

STATE OF NEVADA }
COUNTY OF CLARK } SS:

KIZZY BURROW, under penalties of perjury, being first duly sworn, deposes and says:

That she is the Plaintiff in the above-entitled action; that she has read the foregoing Complaint and knows the contents thereof; that the same is true of her own knowledge, except as to those matters therein stated upon information and belief, and as to those matters, she believes them to be true.

DATED this 7 day of December, 2018.


KIZZY BURROW

SUBSCRIBED and SWORN to before
me this 7 day of December, 2018.


NOTARY PUBLIC in and for said
County and State

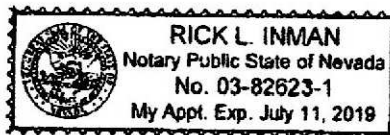
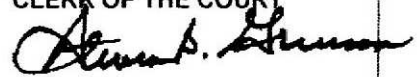


EXHIBIT B. EXHIBIT B

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Steven D. Grierson
CLERK OF THE COURT



1 **EXMT**
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5 STANDISH LAW GROUP
6 1635 Village Center Circle, Suite 180
7 Las Vegas, Nevada 89134
8 Tele: (702) 998-9344
9 Fax: (702) 998-7460
10 *Attorney for Plaintiff*

11 **DISTRICT COURT**
12 **CLARK COUNTY, NEVADA**

13 KIZZY BURROW,

14 Plaintiff,

15 vs.

16 ALI SHAHROKHI,

17 Defendant.

CASE NO: D-18-581208-P

DEPT. NO.: N

18 **EX-PARTE MOTION FOR ORDER SEALING RECORD**


19 Plaintiff, KIZZY BURROW, by and through her attorney, Thomas J. Standish,
20 Esq., of the law firm of Standish Law Group, hereby requests, pursuant to NRS
21 125.110(2), that this Court issue an order sealing all papers, records, proceedings and
22 evidence including exhibits and transcripts and video tapes of the testimony in this
23 case.
24 ...
25 ...
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28 ...

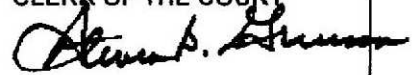
1 NRS 125.110(2) provides:

2 All of the papers, records, proceedings and evidence, including exhibits
3 and transcript of the testimony shall, upon the written request of either
4 party to the action, filed with the Clerk, be sealed and shall not be open to
5 inspection except to the parties or their attorneys or when required as
6 evidence in another action of proceeding.

7 DATED this 16th day of January, 2019.

8 STANDISH LAW GROUP

9 
10 THOMAS J. STANDISH, ESQ.
11 Nevada Bar No. 1424
12 1635 Village Center Circle, #180
13 Las Vegas, Nevada 89134
14 *Attorneys for Plaintiff*



1 **OSFD**
 2 THOMAS J. STANDISH, ESQ.
 3 Nevada Bar No. 1424
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 8 Tele: (702) 998-9344
 9 Fax: (702) 998-7460
 10 *Attorney for Plaintiff*

7 **DISTRICT COURT**
 8 **CLARK COUNTY, NEVADA**

9 KIZZY BURROW,

10 Plaintiff,

11 vs.

12 ALI SHAHROKHI,

13 Defendant.

CASE NO: D-18-581208-P

DEPT. NO.: N

14 **ORDER SEALING RECORD**

15 Pursuant to the request of the Plaintiff, KIZZY BURROW, and upon Ex-Parte
 16 Motion pursuant to NRS 125.110(2), and good cause appearing,

17 IT IS HEREBY ORDERED that the file in case number D-18-581208-P in
 18 the Eighth Judicial District Court, shall be sealed pursuant to NRS 125.110:

19 1. In any action for divorce, the following papers
 20 and pleadings in the action shall be open to the
 21 public inspection in the clerk's office:

22 **CRIMINAL**

23 **HARTER KNOWS**

24 **PARTIES NEVER**

25 **BEEN MARRIED.**

26 **HE LIED HERE AND**

27 **HE LIED ON HIS**

28 **BK 7 PETITION.**

(a) In case the complaint is not answered by the defendant, the summons, with the affidavit or proof of service; the complaint with memorandum endorsed thereon that the default of the defendant in not answering was entered, and the judgment; and in any case where service is made by publication, the affidavit for publication of summons and the order directing the publication of summons.

(b) In all other cases, the pleadings, the finding of the court, any order made on motion as


1 provided in Nevada Rules of Civil Procedure and
2 the judgment.

3 2. All other papers, records, proceedings and
4 evidence, including exhibits and transcript of the
5 testimony, shall, upon the written request of either
6 party to the action, filed with the clerk, be sealed
7 and shall not be open to inspection except to the
8 parties or their attorneys, or when required as
9 evidence in another action or proceeding.

10 DATED this 28th day of January, 2019.

11
12 
13 DISTRICT COURT JUDGE
14 MATHEW HARTER

15 Submitted by:
16 STANDISH LAW GROUP

17 
18 THOMAS J. STANDISH, ESQ.
19 Nevada Bar No. 1424
20 1635 Village Center Circle, #180
21 Las Vegas, Nevada 89134
22 *Attorneys for Plaintiff*
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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: **September 20, 2021**

DocuSigned by:
Ali Shahrokhi
D3A5D2A2AAB6408...

Ali Shahrokhi

Declarant.

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