

FILED

OCT 01 2021

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
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5 *Appellant in Propria Persona*

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

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10 **ALI SHAHROKH** ) **Case No: 81978,82245**  
11 )  
12 )  
13 *Appellant,* ) **APPELLANT'S NOTICE**  
14 **vs.** ) **OF SECOND SUPPLEMENTAL**  
15 ) **AUTHORITIES**  
16 **KIZZY BURROW** )  
17 )  
18 *Respondent.* )

19  
20 **APPEAL**

21 From the Eight Judicial District Court, Clark County  
22 MATHEW HARTER, DISTRICT COURT JUDGE

23  
24 **APPELLANT'S 2<sup>nd</sup> NOTICE OF SUPPLEMENTAL AUTHORITIES**



21-28268

## SUPPLEMENTAL AUTHIRITIES

Pursuant to N.R.A.P. 31(e), Ali Shahrokhi “Appellant”, notifies the Court of the following supplemental authorities.

1. On May 27, 2021 the Nevada Supreme Court issued its Published opinion in IN THE MATTER OF THE PARENTAL RIGHTS AS TO L.L.S., A MINOR, 137 Nev., Advance Opinion 22

The Court held that:

“The Nevada Constitution states that Ink) **person shall be deprived of life, liberty, or property, without due process of law.**” Nev. Const. art. 1, § 8(2); see also U.S. Const. amend. XIV(1). In analyzing the analogous provision of the federal constitution, the United States Supreme Court has recognized the **“fundamental liberty interest of natural parents in the care, custody, and management of their chile and explained that “[e]ven when blood relationships are strained, parents retain a vital interest in preventing the irretrievable destruction of their family life.” Santosky v. Kramer, 455 U.S. 745, 753 (1982). Accordingly, “due process requires states to provide parents with fundamentally fair procedures in parental termination proceedings.”** In re Parental Rights as to ALF., 132 Nev. 209, 212, 371 P.3d 995, 998 (2016)”

This relates to parental termination, raised in , Appellant’s brief on page 21, raising the issue as, “the custody decision was a misnomer for parental termination”. This also relates to parental termination, raised in, Appellant’s brief on page 57, raising the issue as ,” Harter handed Civil Death Penalty of Termination of Parental Rights disguised as a custody order.”

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3 2. On May 27, 2021 the Nevada Supreme Court issued its  
4 Published opinion in IN THE MATTER OF THE PARENTAL RIGHTS AS TO  
5 L.L.S., A MINOR, 137 Nev., Advance Opinion 22

6 The Court held that:

7 “This court applies the **three-part test outlined in Mathews v.**  
8 **Eldridge**, 424 U.S. 319, 335 (1976), when we consider whether a TPR trial  
9 complied with due process. In re Parental Rights as to M.M.L., Jr., 133 Nev.  
10 147, 149-52, 393 P.3d 1079, 1081-83 (2017); In re M.F., 132 Nev. at 213-14,  
11 371 P.3d at 998-99. The Mathews test requires us to carefully "consider and  
12 balance **(1) the parent's interest and (2) the risk of erroneous deprivation**  
13 **against (3) the government's interest.**" In re M.M.L., 133 Nev. at 150, 393  
14 P.3d at 1081. We review constitutional issues such as a parent's right to  
15 due process in a termination proceeding de novo. In re M.F., 132 Nev. at  
16 212, 371 P.3d at 997”

17  
18  
19 This relates to parental termination, raised in , Appellant’s brief on due  
20 process violations on pages:

21 7,12,14,21,22,23,25,27,28,29,33,34,37,39,40,48,49,54,55,56,57,58.

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24 **DATED** this 29<sup>th</sup> day of September



25 Ali Shahrokhi  
26 In Proper Person  
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On **Septemebr 29, 2021**, I served the following:  
**Shahrokhi's Notice of 2<sup>nd</sup> Supplemental Authorities**

Kizzy Burrow (E-served)  
1500 SW 11<sup>th</sup> Ave. #804  
Portland, Oregon. 97201

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

Dated: **September 29, 2021**

/s/ Ali Shahrokhi  
Declarant.