

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed  
On SEP 22, 2022 at 02:47 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

JOSEPH NASO,

Appellant,

vs.

COUNTY OF MARIN, CALIFORNIA,

Respondent.

No. 83594

**RESPONDENT'S APPENDIX**

**VOL. 1**

MICHAEL A. ROSENAUER, ESQ.  
Nevada Bar No. 2782  
MICHAEL A. ROSENAUER, LTD.  
510 W. Plumb Lane, Ste. A  
Reno, NV 89509  
775-324-3303  
Counsel for Appellant Marin County

## CHRONOLOGICAL INDEX OF RESPONDENT'S APPENDIX

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Notice of Entry of Order Denying Motion to Strike and Dismiss Foul Judgment	08/17/2021	1	076
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Request for Judgment	02/20/2014	1	008

CV14-00331  
COUNTY OF MARIN  
District Court  
Washoe County  
DC-0900033659-022  
CA VS JOSEPH 2 Pages  
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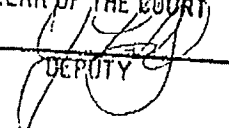
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MICHAEL A. ROSENAUER, ESQ.  
SBN 2782  
ROSENAUER & WALLACE  
510 West Plumb Lane, Suite A  
Reno, NV 89509  
775-324-3303

Attorney(s) for the COUNTY OF MARIN

FILED

2014 FEB 13 PM 2:57

JOEY GRADUNA HASTINGS  
CLERK OF THE COURT  
BY  DEPUTY

IN THE SECOND JUDICIAL DISTRICT COURT  
OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

COUNTY OF MARIN, CALIFORNIA,

Plaintiff,

v.

JOSEPH NASO,

Defendant.

Case No.: CV14 00331

Dept. No.: 4

**NOTICE OF FILING APPLICATION FOR FOREIGN JUDGMENT AND AFFIDAVIT OF  
JUDGMENT CREDITOR**

TO: Joseph Naso, Defendant; and

TO: Pedro Oliveros, Deputy Public Defender, Esquire, attorney for Defendant;

PLEASE TAKE NOTICE that an Application for Foreign Judgment, a copy of which is attached hereto as Exhibit "1", and an Affidavit of Judgment Creditor, a copy of which is attached hereto as Exhibit "2", were filed in the above-referenced case on the 13<sup>th</sup> day of February, 2014.

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1 RA 001



1 1. The name and post office address of the judgment creditor is:

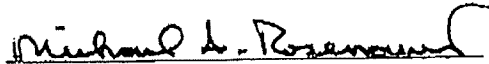
2 County Counsel of Marin County  
3 3501 Civic Center Drive, Suite 275  
4 San Rafael, CA 94903

5 2. The name and post office address of the judgment creditor's attorney is:

6 Jack F. Govi, Assistant County Counsel  
7 Office of the Marin County Counsel  
8 3501 Civic Center Drive, Suite 275  
9 San Rafael, CA 94903

10 **AFFIRMATION:** Pursuant to NRS 239B.030, the undersigned does hereby affirm that the  
11 preceding document does not contain the Social Security number of any person.

12 DATED this 13<sup>th</sup> day of February, 2014.

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15 Michael A. Rosenauer, Esq.  
16 Attorneys for County of Marin  
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CV14-00331  
COUNTY OF MARIN CA VS JOSEPH NASO  
District Court  
Washoe County  
DC-09900053659-023  
02/13/2014 02:57 PM  
1075  
V.J. NVO

CODE 1075

MICHAEL A. ROSENAUER, ESQ.  
SBN 2782  
ROSENAUER & WALLACE  
510 West Plumb Lane, Suite A  
Reno, NV 89509  
775-324-3303

FILED

2014 FEB 13 PM 2:57

JOEY ORDUNA HASTINGS  
CLERK OF THE COURT

BY [Signature]  
DEPUTY

Attorney(s) for the COUNTY OF MARIN

IN THE SECOND JUDICIAL DISTRICT COURT  
OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

COUNTY OF MARIN, CALIFORNIA,

Plaintiff,

v.

JOSEPH NASO,

Defendant.

Case No.:

CV14 00331

Dept. No.:

4

AFFIDAVIT OF JUDGMENT CREDITOR

STATE OF NEVADA )

COUNTY OF WASHOE )

SS:

1. The name and last known address of the Judgment Debtor is:

Joseph Naso, c/o Brandy Ebert, Litigation Coordinator

1 RA 003

1 Department of Corrections, State of California  
2 San Quentin State Prison  
3 San Quentin, CA 94964

4 2. The name and last known address of the Judgment Creditor is:

5 County of Marin  
6 c/o Jack F. Govi, Assistant County Counsel  
7 3501 Civic Center Drive, Suite 275  
8 San Rafael, CA 94903

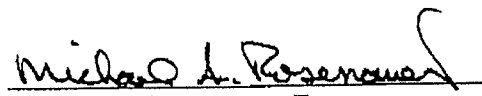
9 3. The foreign judgment that is attached to the Application of Foreign Judgment is valid and  
10 enforceable.

11 4. As of January 16, 2014, \$0.00 of the foreign judgment has been satisfied and \$170,949.69  
12 remains due and owing together with the applicable interest thereon.

13 **AFFIRMATION:** Pursuant to NRS 239B.030, the undersigned does hereby affirm that the  
14 preceding document does not contain the Social Security number of any person.

15 Dated: February 13, 2014

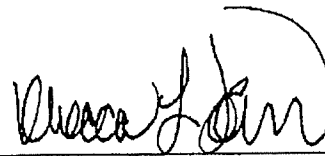
16 ROSENAUER & WALLACE

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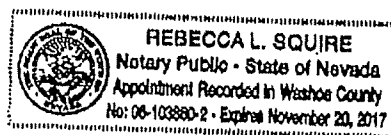
18 Michael A. Rosenauer, Esq.  
19 Attorney for County of Marin

20 Signed and sworn to (or affirmed) before me on the 13<sup>th</sup> day of February, 2014 by Michael A.  
21 Rosenauer, Esq.

22 Dated this 13<sup>th</sup> day of February, 2014

23 

24 NOTARY PUBLIC



1 RA 004

1 CODE 2610

2 Michael A. Rosenauer, Esq.  
3 SBN 2782  
4 ROSENAUER & WALLACE  
510 West Plumb Lane, Suite A  
6 Reno, NV 89509

7 Attorney(s) for the COUNTY OF MARIN

8  
9 **IN THE SECOND JUDICIAL DISTRICT COURT**  
10 **OF THE STATE OF NEVADA**  
11 **IN AND FOR THE COUNTY OF WASHOE**

12  
13 **COUNTY OF MARIN, CALIFORNIA,**

14 **Plaintiff,**

15 **v.**

16 **JOSEPH NASO,**

17 **Defendant.**

Case No.: CV14-00331

Dept. No.: \_4

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19  
20 **NOTICE OF PENDENCY OF ACTION**

21  
22 Pursuant to NRS 14.010, Plaintiff in this action hereby gives notice that on February 13,  
23 2014, it commenced an action in the Second Judicial District Court of the State of Nevada, in and for  
24 the County of Washoe, entitled "COUNTY OF MARIN, CALIFORNIA, v. JOSEPH NASO. The  
25 parties to the action are County of Marin, California, by and through its Counsel Michael A.  
26 Rosenauer, Esq. of the firm of Rosenauer & Wallace, and the defendant Joseph Naso. In this action,  
27 the plaintiff County of Marin has filed an Application of Foreign Judgment (Order Regarding  
28

**1 RA 005**

1 Payment of Defense Cost) from the Superior Court of California, County of Marin whereby  
2 defendant Joseph Naso was ordered to pay the County of Marin \$170,949.69 and such Order  
3 constitutes a judgment and such Order, after its filing in Nevada, authorizes the County of Marin to  
4 create a judgment lien against real property owned by Joseph Naso in Washoe County, Nevada.  
5 Such real property includes but is not limited to the real property known as 350 Medgar Way, Reno,  
6 Washoe County, Nevada, also known as Washoe County Assessor's Parcel Number (APN) 570-241-  
7 01. Defendant Joseph Naso is incarcerated in San Quentin Prison in Marin County, California,  
8 awaiting his execution on death row for the conviction of four capital murders.  
9

10  
11  
12 AFFIRMATION

13 The undersigned does hereby affirm that the preceding document does not contain the social  
14 security number of any person.

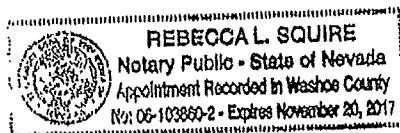
15 Dated this 13<sup>th</sup> day of February, 2014.

16 ROSENAUER & WALLACE

17  
18  
19 Michael A. Rosenauer  
20 Michael A. Rosenauer, Esq.  
21 Attorneys for the County of Marin

22 State of Nevada )  
ss)  
23 County of Washoe)

24 On this \_\_\_\_ day of February, 2014, personally appeared before me, Michael A. Rosenauer, Esq.  
25 who acknowledged to me that he executed the forgoing document.



Rebecca L. Squire  
NOTARY PUBLIC

1 CERTIFICATE OF SERVICE

2  
3 Pursuant to NRCp 5(b), I certify that I am an employee of Rosenauer & Wallace, 510 West  
4 Plumb Lane, Suite A, Reno, NV 89509, and that on this date I served the foregoing document(s)  
5 described as follows:  
6

7 NOTICE OF PENDENCY OF ACTION

8  
9 on the party(s) set forth below by:

10 \_\_\_\_\_ Reno Carson Messenger Service

11 XXX Placing an original or true copy thereof in a sealed envelope placed for  
12 collection and mailing in the United States Mail, at Reno,  
Nevada, postage paid, following ordinary business practices.

13 addressed as follows:  
14

15 Joseph Naso, in care of Brandy Ebert,  
16 Litigation Coordinator  
San Quentin State Prison  
17 San Quentin, CA 94964

Pedro Oliveros  
Deputy Public Defender  
County of Marin  
3501 Civic Center Drive, Suite 139  
San Rafael, CA 94903

18  
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22 DATED this 12<sup>th</sup> day of February, 2014.  
23

24  
25   
26 REBECCA SQUIRE  
27  
28

1 RA 007

1 CODE 3870

2 Michael A. Rosenauer, Esq.  
3 SBN 2782  
4 ROSENAUER & WALLACE  
5 510 West Plumb Lane, Suite A  
6 Reno, NV 89509

7 Attorney(s) for the COUNTY OF MARIN

8  
9 **IN THE SECOND JUDICIAL DISTRICT COURT**  
10 **OF THE STATE OF NEVADA**  
11 **IN AND FOR THE COUNTY OF WASHOE**

12  
13 **COUNTY OF MARIN, CALIFORNIA,**

14 **Plaintiff,**

15 **v.**

16 **JOSEPH NASO,**

17 **Defendant.**

Case No.: CV14-00331

Dept. No.: \_4

18  
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20 **REQUEST FOR JUDGMENT**

21  
22  
23 Plaintiff Marin County respectfully requests this Court issue a Nevada Judgment based upon  
24 its domestication of its California Judgment in Nevada.

25 Marin County retained Nevada Counsel to utilize the Uniform Enforcement of Foreign  
26 Judgments Act found within NRS Chapter 17 to domesticate its existing California Judgment.  
27 However, Marin County wishes to be on record in Nevada. To be on record in Nevada, the statutes  
28 require a recordable document entered by a Nevada Court. NRS 17.150(2) permits the holder of a

**1 RA 008**

1 sister state judgment to request a Nevada judgment such that it can be recorded within the various  
2 Nevada counties. Moreover, a Nevada judgment would be necessary to support a Writ of  
3 Garnishment in Aid of Execution or an Execution.

4 With these principles in mind, Plaintiff Marin County respectfully requests a Judgment  
5 identical in amount and substance to that entered by the California Superior Court be entered by this  
6 Court such that it can pursue any remedies within the State of Nevada.  
7

8  
9 **AFFIRMATION**

10 The undersigned does hereby affirm that the preceding document does not contain the social  
11 security number of any person.  
12

13 Dated this 20<sup>th</sup> day of February, 2014.

14 ROSENAUER & WALLACE  
15

16 Michael A. Rosenauer  
17 Michael A. Rosenauer, Esq.  
18 Attorneys for the County of Marin  
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IN THE SECOND JUDICIAL DISTRICT COURT FOR THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

COUNTY OF MARIN, CALIFORNIA,

Plaintiff,

v.

JOSEPH NASO,

Defendant.

Case No. CV14-00331

Department No.: 4

**JUDGMENT**

On February 13, 2014, Plaintiff, County of Marin, California, by and through its attorney, Michael A. Rosenauer, Esq. of Rosenauer & Wallace, filed an exemplified copy of a foreign Judgment pursuant to NRS Chapter 17 registering the December 20, 2013 Order Regarding Payment of Costs of Defense from the Superior Court of California, County of Marin, signed by the Honorable James T. Chou.

On February 13, 2014, Plaintiff filed a Notice of Filing Application for Foreign Judgment and Affidavit of Judgment Creditor wherein Defendant Joseph Naso and his attorney Pedro Oliveros, Deputy Public Defender, County of Marin, were notified of Plaintiff's Application for Foreign Judgment and the Affidavit of Judgment Creditor filed in the instant matter and provided a copy of the same. On February 14, 2014, Plaintiff filed an Affidavit of Mailing evidencing service on February 13, 2014 of a copy of the Filing of Exemplified Copy of Foreign Judgment, Notice of Filing Application of Foreign Judgment and the Affidavit of Judgment Creditor upon Joseph Naso and his attorney by certified mail, return receipt requested. Additionally, Plaintiff

1 filed a Notice of Pendency of Action. On February 20, 2014, a Request for Judgment was filed  
2 requesting this Court issue a Nevada Judgment based upon Plaintiff's domestication of its  
3 California Judgment in Nevada.

4 NRS 17.150(2) permits the holder of a sister state judgment to request a Nevada  
5 judgment such that it can be recorded within the various Nevada counties. Additionally, NRS  
6 17.350 states that the clerk shall treat the foreign judgment in the same manner as a judgment of  
7 the district court of this state, and that a judgment so filed has the same effect and is subject to  
8 the same procedures...and may be enforced or satisfied in like manner. NRS 17.360 states that  
9 no execution or other process for enforcement of a foreign judgment may issue until 30 days  
10 after the date of mailing of the notice of filing. More than thirty (30) days has passed since the  
11 mailing of the notice of filing and no opposition has been filed with this Court.

12 Plaintiff has complied with the provisions of Uniform Enforcement of Foreign Judgments  
13 Act, NRS17.330 et seq., and as such, the California Superior Court Order entered on December  
14 20, 2013 can be treated as a judgment of this Court.

15 Based upon the foregoing and good cause appearing,

16 IT IS HEREBY ORDERED:

17 1. That Defendant Joseph Naso is ordered to pay the County of Marin One Hundred  
18 Seventy Thousand Nine Hundred Forty-Nine Dollars and Sixty-Nine Cents (\$170,949.69).  
19 Judgment in the amount of One Hundred Seventy Thousand Nine Hundred Forty-Nine Dollars  
20 and Sixty-Nine Cents (\$170,949.69) is hereby entered in favor of the County of Marin,  
21 California and against Joseph Naso. This Judgment is inclusive of costs and will bear interest at  
22 the rate set forth by statute until fully paid.

23 2. That Defendant Joseph Naso is prohibited from making any encumbrances or  
24 divesting his real estate located at 350 Medgar Avenue, Reno, Nevada. Assessor's parcel  
25 number 570-241-01.

26 3. That the County of Marin is authorized to execute a lien in the amount of  
27 \$170,949.69 against real property owned by defendant: 350 Medgar Avenue, Reno, Nevada,  
28 APN 570-241-01, and against any vacant real property owned by defendant in Reno, Nevada.

1           4.     That execution or other process of enforcement of this judgment may issue  
2 immediately.

3           DATED this 26 day of March, 2014.

4                                 *Connie I. Steinheimer*  
5                                 \_\_\_\_\_  
6                                 DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

CASE NO. CV14-00331

I certify that I am an employee of the SECOND JUDICIAL DISTRICT COURT of the STATE OF NEVADA, COUNTY OF WASHOE; that on the 24<sup>th</sup> day of March, 2014, I electronically filed the **JUDGMENT** with the Clerk of the Court by using the ECF system.

I further certify that I transmitted a true and correct copy of the foregoing document by the method(s) noted below:

**Personal delivery to the following: [NONE]**

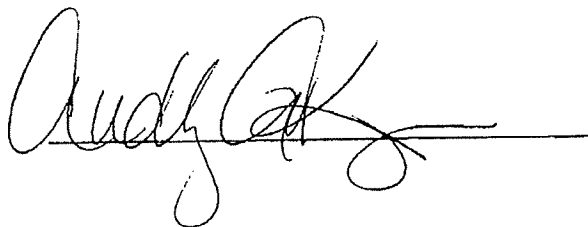
**Electronically filed with the Clerk of the Court by using the ECF system which will send a notice of electronic filing to the following:**

MICHAEL ROSENAUER, ESQ. for COUNTY OF MARIN

**Deposited in the Washoe County mailing system for postage and mailing with the United States Postal Service in Reno, Nevada:**

Joseph Naso, in care of Brandy Ebert  
Litigation Coordinator  
San Quentin State Prison  
San Quentin, CA 94964

Pedro Oliveros  
Deputy Public Defender  
County of Marin  
3501 Civil Center Dr., Ste. 139  
San Rafael, CA 94903

A handwritten signature in black ink, appearing to read "Andy G. K.", is written over a horizontal line.

1 CODE: 2535  
2 MICHAEL A. ROSENAUER, ESQ.  
3 ROSENAUER & WALLACE  
4 State Bar No. 2782  
5 510 West Plumb Lane, Suite A  
6 Reno, Nevada 89509  
7 (775) 324-3303 Telephone  
8 (775) 324-6616 Fax

9 Attorney for the County of Marin

10 **IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**  
11 **IN AND FOR THE COUNTY OF WASHOE**

12 \* \* \* \* \*

13 COUNTY OF MARIN, CALIFORNIA,  
14 Plaintiff,

CASE NO.: CV14-00331

15 v.

DEPT. NO.: 4

16 JOSEPH NASO,  
17 Defendant.

18 **NOTICE OF ENTRY OF JUDGMENT**

19 PLEASE TAKE NOTICE that on the 26<sup>th</sup> day of March, 2014, a Judgment (the  
20 "Judgment") was entered in the above-captioned matter.

21 A copy of the Order is attached hereto as Exhibit "1".

22 **AFFIRMATION:** Pursuant to NRS 239B.030, the undersigned does hereby affirm that  
23 the preceding document does not contain the Social Security number of any person

24 DATED this 27<sup>th</sup> day of March, 2014.

25 ROSENAUER & WALLACE

26   
MICHAEL A. ROSENAUER, ESQ.

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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of Rosenauer & Wallace,  
510 West Plumb Lane, Suite A, Reno, NV 89509, and that on this date I served the  
foregoing document(s) described as follows:

**NOTICE OF ENTRY OF JUDGMENT**

on the party(s) set forth below by:

XXX Electronic Mailing via Second Judicial District Court  
CM/ECF System to all those persons listed on the ECF  
Confirmation Sheet.


XXX Placing an original or true copy thereof in a sealed envelope  
placed for collection and mailing in the United States Mail,  
at Reno, Nevada, postage paid, following ordinary business  
practices.

addressed as follows:

Joseph Naso, in care of Brandy Ebert,  
Litigation Coordinator  
San Quentin State Prison  
San Quentin, CA 94964

Pedro Oliveros  
Deputy Public Defender  
County of Marin  
3501 Civic Center Drive, Suite 139  
San Rafael, CA 94903

DATED this 27<sup>th</sup> day of March, 2014.

  
REBECCA SQUIRE

Dept. No: 4

**1 RA 017**



FILED  
Electronically  
2014-03-27 04:20:17 PM  
Joey Orduna Hastings  
Clerk of the Court  
Transaction # 4363402

**Exhibit “1”**

**Exhibit “1”**

**1 RA 018**

3783

IN THE SECOND JUDICIAL DISTRICT COURT FOR THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

COUNTY OF MARIN, CALIFORNIA,

Plaintiff,

v.

JOSEPH NASO,

Defendant.

Case No. CV14-00331

Department No.: 4

**JUDGMENT**

On February 13, 2014, Plaintiff, County of Marin, California, by and through its attorney, Michael A. Rosenauer, Esq. of Rosenauer & Wallace, filed an exemplified copy of a foreign Judgment pursuant to NRS Chapter 17 registering the December 20, 2013 Order Regarding Payment of Costs of Defense from the Superior Court of California, County of Marin, signed by the Honorable James T. Chou.

On February 13, 2014, Plaintiff filed a Notice of Filing Application for Foreign Judgment and Affidavit of Judgment Creditor wherein Defendant Joseph Naso and his attorney Pedro Oliveros, Deputy Public Defender, County of Marin, were notified of Plaintiff's Application for Foreign Judgment and the Affidavit of Judgment Creditor filed in the instant matter and provided a copy of the same. On February 14, 2014, Plaintiff filed an Affidavit of Mailing evidencing service on February 13, 2014 of a copy of the Filing of Exemplified Copy of Foreign Judgment, Notice of Filing Application of Foreign Judgment and the Affidavit of Judgment Creditor upon Joseph Naso and his attorney by certified mail, return receipt requested. Additionally, Plaintiff

1 filed a Notice of Pendency of Action. On February 20, 2014, a Request for Judgment was filed  
2 requesting this Court issue a Nevada Judgment based upon Plaintiff's domestication of its  
3 California Judgment in Nevada.

4 NRS 17.150(2) permits the holder of a sister state judgment to request a Nevada  
5 judgment such that it can be recorded within the various Nevada counties. Additionally, NRS  
6 17.350 states that the clerk shall treat the foreign judgment in the same manner as a judgment of  
7 the district court of this state, and that a judgment so filed has the same effect and is subject to  
8 the same procedures...and may be enforced or satisfied in like manner. NRS 17.360 states that  
9 no execution or other process for enforcement of a foreign judgment may issue until 30 days  
10 after the date of mailing of the notice of filing. More than thirty (30) days has passed since the  
11 mailing of the notice of filing and no opposition has been filed with this Court.

12 Plaintiff has complied with the provisions of Uniform Enforcement of Foreign Judgments  
13 Act, NRS17.330 et seq., and as such, the California Superior Court Order entered on December  
14 20, 2013 can be treated as a judgment of this Court.

15 Based upon the foregoing and good cause appearing,

16 IT IS HEREBY ORDERED:

17 1. That Defendant Joseph Naso is ordered to pay the County of Marin One Hundred  
18 Seventy Thousand Nine Hundred Forty-Nine Dollars and Sixty-Nine Cents (\$170,949.69).  
19 Judgment in the amount of One Hundred Seventy Thousand Nine Hundred Forty-Nine Dollars  
20 and Sixty-Nine Cents (\$170,949.69) is hereby entered in favor of the County of Marin,  
21 California and against Joseph Naso. This Judgment is inclusive of costs and will bear interest at  
22 the rate set forth by statute until fully paid.

23 2. That Defendant Joseph Naso is prohibited from making any encumbrances or  
24 divesting his real estate located at 350 Medgar Avenue, Reno, Nevada. Assessor's parcel  
25 number 570-241-01.

26 3. That the County of Marin is authorized to execute a lien in the amount of  
27 \$170,949.69 against real property owned by defendant: 350 Medgar Avenue, Reno, Nevada,  
28 APN 570-241-01, and against any vacant real property owned by defendant in Reno, Nevada.

4. That execution or other process of enforcement of this judgment may issue immediately.

DATED this 26 day of March, 2014.

Connie L. Steinheimer  
DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

CASE NO. CV14-00331

I certify that I am an employee of the SECOND JUDICIAL DISTRICT COURT of the STATE OF NEVADA, COUNTY OF WASHOE; that on the 26 day of March, 2014, I electronically filed the JUDGMENT with the Clerk of the Court by using the ECF system.

I further certify that I transmitted a true and correct copy of the foregoing document by the method(s) noted below:

Personal delivery to the following: [NONE]

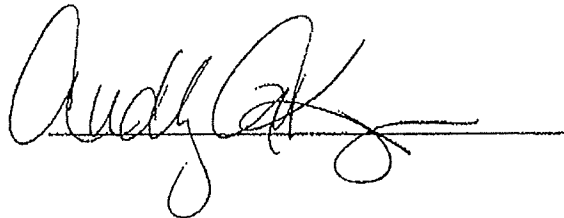
Electronically filed with the Clerk of the Court by using the ECF system which will send a notice of electronic filing to the following:

MICHAEL ROSENAUER, ESQ. for COUNTY OF MARIN

Deposited in the Washoe County mailing system for postage and mailing with the United States Postal Service in Reno, Nevada:

Joseph Naso, in care of Brandy Ebert  
Litigation Coordinator  
San Quentin State Prison  
San Quentin, CA 94964

Pedro Oliveros  
Deputy Public Defender  
County of Marin  
3501 Civil Center Dr., Ste. 139  
San Rafael, CA 94903



1 CODE: 2650  
2 MICHAEL A. ROSENAUER, ESQ.  
3 State Bar No. 2782  
4 MICHAEL A. ROSENAUER, LTD.  
5 510 West Plumb Lane, Suite A  
6 Reno, Nevada 89509  
7 (775) 324-3303 Telephone  
8 (775) 324-6616 Fax  
9 michael@mrosenauer.com

10 Attorney for the County of Marin

11 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
12  
13 IN AND FOR THE COUNTY OF WASHOE

14 \* \* \* \* \*

15 COUNTY OF MARIN, CALIFORNIA,  
16 Plaintiff,  
17 v.

CASE NO.: CV14-00331

DEPT. NO.: 4

18 JOSEPH NASO,  
19 Defendant.  
20 \_\_\_\_\_/

21 MARIN COUNTY'S OPPOSITION TO JOSEPH NASO'S MOTION TO  
22 STRIKE AND DISMISS FOUL JUDGMENT

23 Marin County hereby Opposes that document entitled Motion to Strike and  
24 Dismiss Foul Judgment filed by Defendant Joseph Naso. Unfortunately, Mr. Naso  
25 incorrectly interprets the Judgment entered by Judge James T. Chou, Superior Court  
26 Judge on December 20, 2013. Judge Chou found that Marin County was permitted to  
27 recover \$170,949.69 from Mr. Naso for costs incurred in his defense of the Criminal  
28 matter for which he is currently serving time on death row at San Quentin. This  
Court properly thereafter entered a Sister State Judgment. The Nevada Judgment  
should therefore remain unaltered. Mr. Naso's Motion is properly denied.

This matter was brought before the Nevada Court by way of the Full Faith and  
Credit portion of the United States Constitution. United States Constitution Article

1 IV,§1. The Uniform Enforcement of Foreign Judgments Act was codified by the  
2 Nevada Legislature in 1979 as NRS 17.350 *et. seq.* Full Faith and Credit permits the  
3 Court of one state to recognize the duly entered judgment of a sister state such that  
4 the originating state's judgment becomes effective in the sister state. NRS 17.350. A  
5 judgment creditor in the sister state can then execute upon the judgment debtor's  
6 assets found within the sister state. The attempts by judgment debtors to hide assets  
7 in adjoining or foreign states are thwarted.  
8

9 In the matter before this Court, Marin County presented an exemplified copy  
10 of the Judgment entered by Judge Chou on December 20, 2013. A copy of Judge  
11 Chou's Order is attached hereto as **Exhibit 1**. Thereafter, Marin County's Nevada  
12 Counsel served the required Notice and Affidavit of Judgment Creditor as required  
13 by NRS 17.360. On March 26, 2014, this Court entered a Judgment wherein the  
14 Marin County (California) Judgment became a Nevada Judgment.<sup>1</sup> The Nevada  
15 Judgment permitted Marin County to pursue Mr. Naso's Nevada assets, which it did.  
16 Copies of Marin County's filings with the Nevada Court are attached as **Exhibit 2**.  
17 This Court's corresponding Judgment is attached hereto as **Exhibit 3**.  
18  
19

20 Now, Mr. Naso argues that this Court misconstrued Judge Chou's Order and  
21 erroneously entered its Nevada Judgment. Motion to Strike P.2, l. 25-28. Judge's  
22 Chou's Order concludes "1) Defendant is ordered to pay the County of Marin  
23 \$170,949.69." See **Exhibit 1**, P.4, l.8. No group of words could state a conclusion  
24 more clearly. The Court continued to explicitly list the Nevada real property upon  
25  
26

---

27 <sup>1</sup> This proceeding was necessitated by way of Marin County discovering that Mr. Naso had assets  
28 within Nevada as of July, 2011 totaling of between \$560,000.00 and \$944,000.00. Mr. Naso was  
arguing that he was indigent and hence, entitled to Counsel at Marin County's expense. See Judge  
Chu's Order regarding Payment of Costs of Defense P.1, l. 25-26.

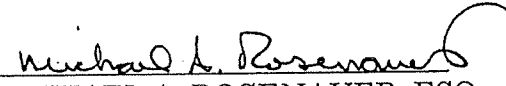
1 which Marin County was permitted to record a lien. See Exhibit 1, P4, 1.9-14. Mr.  
2 Naso is simply in error when he argues that Judge Chou's Order was improperly  
3 interpreted and applied by this Court.<sup>2</sup>

4 The Sister State Judgment signed March 26, 2014 was properly entered and  
5 should not be disturbed.

6  
7 **AFFIRMATION:** Pursuant to NRS 239B.030, the undersigned does hereby affirm  
8 that the preceding document does not contain the Social Security number of any  
9 person.

10 DATED this 7<sup>th</sup> day of June, 2021.

11 MICHAEL A. ROSENAUER, LTD.

12   
13 MICHAEL A. ROSENAUER, ESQ.

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<sup>2</sup> It is interesting that Mr. Naso was claiming he was, on one hand, indigent but within his same  
Motion, speaks of his "Reno property". See Motion P.2, l. 3 (indigence) and P.2,l. 26 (Reno property).



CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Michael A. Rosenauer, Ltd., 510 West Plumb Lane, Suite A, Reno, NV 89509, and that on this date I served the foregoing document(s) described as follows:

MARIN COUNTY'S OPPOSITION TO JOSEPH NASO'S MOTION TO STRIKE AND DISMISS FOUL JUDGMENT

on the party(s) set forth below by:

XXX

Electronic Mailing via Second Judicial District Court CM/ECF System to all those persons listed on the ECF Confirmation Sheet.

XXX

Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Reno, Nevada, postage paid, following ordinary business practices.

addressed as follows:

Joseph Naso, #AR-9737  
CSP-SQ 1-EB-80  
San Quentin State Prison  
San Quentin, CA 94964

Rob Bonta, Attorney General  
1300 "I" Street  
Suite 126  
Sacramento, CA 95814

Petro Oliveros  
Deputy Public Defender  
County of Marin  
3501 Civic Center Drive, Suite 139  
San Rafael, CA 94903

DATED this 7<sup>th</sup> day of June, 2021.

  
REBECCA SQUIRE

County of Marin California, Plaintiff

v.

Joseph Naso, Defendant

Case No.: CV14-00331

Dept. No: 4

Exhibit Number	Description	Pages
1.	Order Regarding Payment of Costs of Defense [Penal Code §§ 987 <i>et seq.</i> ]	5
2.	Filing of Exemplified Copy of Foreign Judgment	14
3.	Judgment	4

FILED  
Electronically  
CV14-00331  
2021-06-07 04:16:27 PM  
Alicia L. Lerud  
Clerk of the Court  
Transaction # 8483105 : yvilorla

**Exhibit “1”**

**EXHIBIT “1”**

**1 RA 028**

00000000

DEC 20 2013

KIM TURNER, Court Executive Officer  
MARIN COUNTY SUPERIOR COURT  
By: L. C. Turner, Deputy

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF MARIN

PEOPLE OF THE STATE OF CALIFORNIA

Case No. SC 175206A

v.

JOSEPH NASO,

Defendant.

ORDER REGARDING PAYMENT OF  
COSTS OF DEFENSE

[Penal Code §§ 987 *et seq.*]

Defendant Joseph Naso stands convicted by jury trial of multiple counts of special circumstances murder in Marin County Superior Court Case Number SC175206A (hereafter "defendant's criminal matter"). The Honorable Andrew E. Sweet presided over defendant's criminal matter which has now concluded.

This court was assigned the task of determining what, if any, amount of money defendant should pay to the County of Marin based upon funds expended for defendant's defense. This court is in possession of County Counsel's report dated July 27, 2011, entitled "Report Regarding Joseph Naso's Ability to Employ his own Counsel or Advisory Counsel" (hereafter "the July 27, 2011 report"). In that report, County Counsel concluded that defendant had assets in the minimum amount of \$560,000 up to \$944,000 at the maximum amount. The Court sealed its findings at that time (July 2011).

On December 13, 2013, this court held a hearing pursuant to Penal code section 987.8. In addition to the July 27, 2011 report, this court read and considered the following filings:

- 1) a notice of motion and motion for reimbursement of defense costs filed by County Counsel on October 31, 2013 (hereafter "notice of and motion for reimbursement");
- 2) defendant's one page declaration dated November 21, 2013, filed on that same date (hereafter "defendant's declaration");
- 3) a supplemental motion for reimbursement of defense costs filed by County Counsel on December 2, 2013 (hereafter "supplemental motion");
- 4) an addendum to July 27, 2011 report on Joseph Naso's assets filed by County Counsel on December 3, 2013 (hereafter "the addendum");
- 5) a declaration of Edward J. Kiernan and attachments in support of addendum to July 17, 2011 report on Joseph Naso's assets filed on December 3, 2013 (hereafter "first Kiernan declaration");
- 6) a declaration of Edward J. Kiernan and attachments in support of submittal of additional documents to the addendum to July 17, 2011 report on Joseph Naso's assets filed on December 12, 2013 (hereafter "second Kiernan declaration"); and
- 7) defendant's request for a gag order dated October 30, 2013 and received by this court on October 31, 2013.<sup>1</sup>

The addendum and first Kiernan declaration stated that defendant had transferred to his son David Naso approximately \$295,465.37 in liquid assets and gold coins (with such coins conservatively valued at \$30,000) between July 2011 and 2012. Defendant also divested himself of additional liquid assets from two accounts with Bank of America, an account at Wells Fargo Bank, and investments with Scott Trade. The whereabouts of such asset, as well as assets previously deposited in an account with Nevada State Bank, are presently unknown. The addendum also revealed that defendant currently owns improved real estate valued at or near \$125,000.00 and, potentially, an additional parcel of unimproved real estate that was not valued.

---

<sup>1</sup> The court considered this filing during the December 13, 2013 hearing pursuant to defendant's request.

1. In defendant's declaration, defendant asserts that he no longer possesses "any financial liquid  
2 assets." At the December 13, 2013 hearing, defendant again asserted that he no longer has any  
3 financial liquid assets.

4 In the notice of and motion for reimbursement and supplemental motion, County Counsel  
5 lists the fees and expenses incurred by the County of Marin. Those fees and expenses total  
6 \$151,526.58. In addition, this court found that the County will have paid \$19,423.11 in additional  
7 costs for the services of private investigator Everson Thompson. Therefore, the total cost of  
8 defendant's legal defense in this case is \$170,949.69.

9 Having read and considered all of the information submitted to it, and having conducted a  
10 review of the defendant's ability to pay all or part of the costs of his legal defense pursuant to Penal  
11 Code Section 987 et seq.,

12  
13 **THIS COURT HEREBY FINDS:**

- 14 1. Defendant has the ability to pay the legal costs, investigative costs, and witness costs  
15 associated with defendant's criminal matter; that defendant has significant assets including  
16 the improved and unimproved real estate as noted by County Counsel; and that defendant has  
17 transferred to his son, David Naso, a minimum of \$295,465.37 in liquid assets and gold  
18 coins.
- 19 2. Defendant received legal and investigative services from the County of Marin and a private  
20 investigator during the course of defendant's criminal matter; those legal and investigative  
21 services were provided to defendant to assist him in his defense of the criminal charges; legal  
22 services costs total \$116,207.70 and represent the 970.75 hours expended by the Marin  
23 County Public Defender at a reduced rate of \$120.00 per hour; and that the number of hours  
24 and the hourly rate are reasonable.
- 25 3. Investigative services costs total \$40,898.28 (including two approved witness fee invoices)  
26 and this court has previously approved the number of hours and invoices from the  
27 investigator; that the witness fees of \$577.51 are reasonable; and that discovery costs  
28 incurred by the District Attorney for defendant in the amount of \$13,266.20 are reasonable.

1 4. The total amount of the costs for the legal services, investigative service, and witness fees is  
2 \$170,949.69.

3 5. Defendant has the present ability to pay the County of Marin \$170,949.69.

4 6. Defendant did dispose of a minimum of \$295,465.37 of his liquid assets between the court's  
5 first inquiries in July 2011 and 2012, and the December 13, 2013 hearing.

6  
7 **BASED UPON THE COURT'S FINDINGS, IT IS HEREBY ORDERED:**

8 1. Defendant is ordered to pay the County of Marin \$170,949.69.

9 2. That defendant is prohibited from making any encumbrances or divesting his real estate  
10 located at:

11 350 Medgar Avenue, Reno NV. The Assessor's parcel number is 570-241-01.

12 3. The County of Marin is authorized to execute a lien in the amount of \$170,949.69 against the  
13 following real property owned by defendant: 350 Medgar Avenue, Reno NV. The  
14 Assessor's parcel number is 570-241-01. Additionally, the County of Marin is authorized to  
15 execute a lien in the amount of \$170,949.60 against any vacant real property owned by  
16 defendant in Reno, Nevada. This Order shall have the same force and effect of a civil  
17 judgment [Penal Code Section 987.8(f)].

18 4. The County of Marin is authorized to trace the liquid assets divested by defendant to his son,  
19 David, and others and the Court will entertain a motion to seize such assets as having been  
20 fraudulently or otherwise improperly divested to the extent necessary to satisfy the Court's  
21 order that defendant pay the \$170,949.69 to the County of Marin.

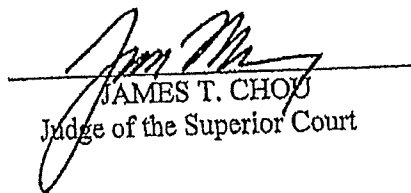
22 5. That to assist the County in tracing the assets owned by defendant, the July 27, 2011 report,  
23 the first Kiernan declaration, and the second Kiernan declaration may be released to the  
24 County of Marin for this specific purpose.

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6. The County of Marin is authorized to return to this Court for any orders that are necessary in facilitating the recovery of \$170,949.69 from defendant.

Dated: December 20, 2013.

  
JAMES T. CHOU  
Judge of the Superior Court



FILED  
Electronically  
CV14-00331  
2021-06-07 04:16:27 PM  
Alicia L. Lerud  
Clerk of the Court  
Transaction # 8483105 : yvilorla

**Exhibit “2”**

**EXHIBIT “2”**

**1 RA 034**

COPY

FILED

1 CODE \$1760  
2 MICHAEL A. ROSENAUER, Esq.  
3 SBN 2782  
4 ROSENAUER & WALLACE  
5 510 West Plumb Lane, Suite A  
6 Reno, NV 89509  
7 775-324-3303

2014 FEB 13 PM 2:57

JOEY CRDUNA HASTINGS  
CLERK OF COURT

BY \_\_\_\_\_  
DEPUTY

8 Attorney(s) for the COUNTY OF MARIN

9  
10 IN THE SECOND JUDICIAL DISTRICT COURT  
11 OF THE STATE OF NEVADA  
12 IN AND FOR THE COUNTY OF WASHOE

13  
14 COUNTY OF MARIN, CALIFORNIA,

15 Plaintiff,

16 v.

17 JOSEPH NASO,

18 Defendant.  
19  
20  
21

Case No.: CV14 00331  
4  
Dept. No.: \_\_\_\_\_

22 FILING OF EXEMPLIFIED COPY OF FOREIGN JUDGMENT  
23

24 COMES NOW Plaintiff, County of Marin, by and through counsel, Michael A. Rosenauer,  
25 Esq. of ROSENAUER & WALLACE, and hereby files the County of Marin's Foreign Judgment  
26 pursuant to NRS Chapter 17, specifically NRS 17.350, *et seq.* and registers an exemplified copy of  
27 the Judgment which is attached hereto as Exhibit "1" as follows:  
28

1 RA 035

1 Order Regarding Payment of Costs of Defense from the Superior Court of California, County  
2 of Marin, signed by the Honorable James T. Chou and filed on December 20, 2013.

3 I declare under penalty of perjury under the law of the State of Nevada that the foregoing is  
4 true and correct.

5 **AFFIRMATION:** Pursuant to NRS 239B.030, the undersigned does hereby affirm that the  
6 preceding document does not contain the Social Security number of any person.

7 Dated this 13<sup>th</sup> day of February, 2014

ROSENAUER & WALLACE

8  
9 Michael A. Rosenauer  
10 Michael A. Rosenauer, Esq.  
11 Counsel for the County of Marin  
12  
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14  
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V,  
Joseph Naso, Defendant  
Case No.:  
Dept. No: PR

V.

Joseph Naso, Defendant:

Case No.:

Dept. No: PR

[illegible]

**Exhibit “1”**

**Exhibit “1”**

**1 RA 038**

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF MARIN

PEOPLE OF THE STATE OF CALIFORNIA

CASE NO. SC175208A

V.

JOSEPH NASO

DEFENDANT.

EXEMPLIFICATION  
OF RECORD

I, Kim Turner, Court Executive Officer and Clerk of the Superior Court of California, County of Marin hereby certify that: the document(s) identified below are full, true and correct copies of the originals on file in this Court; therefore, these documents have been authenticated in accordance with the provisions of Title 28, United States Code § 1738, with the seal of the Marin County Superior Court affixed:

ORDER REGARDING PAYMENT OF COSTS OF DEFENSE [PENAL CODE §§ 987 ET SEQ.]

FILED DECEMBER 20, 2013



1/10/14  
Date

*Kim Turner*  
Court Executive Officer

I, Faye D'Opal, Presiding Judge of the Superior Court of California, County of Marin, hereby certify that: the Marin County Superior Court is a court of record; Kim Turner, who has signed this attestation, is the duly appointed Court Executive Officer and Clerk of the Marin County Superior Court; the above signature is her genuine handwriting; all her official acts as Court Executive Officer are entitled to full faith and credit, and this attestation is in due form of law.



1.10.2014  
Date

*Faye D'Opal*  
Presiding Judge

I, Kim Turner, Court Executive Officer of the Superior Court of California, County of Marin, and Clerk of the Court, do hereby certify that the Honorable Judge Faye D'Opal, who has signed the foregoing attestation, is the duly elected and qualified Presiding Judge of said Court, and that the signature of said Judge to said Certificate is genuine.



1/10/14  
Date

*Kim Turner*  
Court Executive Officer

000000

DEC 20 2013

KIM TURNER, Court Executive Officer  
MARIN COUNTY SUPERIOR COURT  
By: L. Ceballos, Deputy

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF MARIN

PEOPLE OF THE STATE OF CALIFORNIA

Case No. SC 175206A

v.  
JOSEPH NASO,  
Defendant.

ORDER REGARDING PAYMENT OF  
COSTS OF DEFENSE  
[Penal Code §§ 987 et seq.]

Defendant Joseph Naso stands convicted by jury trial of multiple counts of special circumstances murder in Marin County Superior Court Case Number SC175206A (hereafter "defendant's criminal matter"). The Honorable Andrew E. Sweet presided over defendant's criminal matter which has now concluded.

This court was assigned the task of determining what, if any, amount of money defendant should pay to the County of Marin based upon funds expended for defendant's defense. This court is in possession of County Counsel's report dated July 27, 2011, entitled "Report Regarding Joseph Naso's Ability to Employ his own Counsel or Advisory Counsel" (hereafter "the July 27, 2011 report"). In that report, County Counsel concluded that defendant had assets in the minimum amount of \$560,000 up to \$944,000 at the maximum amount. The Court sealed its findings at that time (July 2011).

On December 13, 2013, this court held a hearing pursuant to Penal code section 987.8. In addition to the July 27, 2011 report, this court read and considered the following filings:

- 1) a notice of motion and motion for reimbursement of defense costs filed by County Counsel on October 31, 2013 (hereafter "notice of and motion for reimbursement");
- 2) defendant's one page declaration dated November 21, 2013, filed on that same date (hereafter "defendant's declaration");
- 3) a supplemental motion for reimbursement of defense costs filed by County Counsel on December 2, 2013 (hereafter "supplemental motion");
- 4) an addendum to July 27, 2011 report on Joseph Naso's assets filed by County Counsel on December 3, 2013 (hereafter "the addendum");
- 5) a declaration of Edward J. Kiernan and attachments in support of addendum to July 17, 2011 report on Joseph Naso's assets filed on December 3, 2013 (hereafter "first Kiernan declaration");
- 6) a declaration of Edward J. Kiernan and attachments in support of submittal of additional documents to the addendum to July 17, 2011 report on Joseph Naso's assets filed on December 12, 2013 (hereafter "second Kiernan declaration"); and
- 7) defendant's request for a gag order dated October 30, 2013 and received by this court on October 31, 2013.<sup>1</sup>

The addendum and first Kiernan declaration stated that defendant had transferred to his son David Naso approximately \$295,465.37 in liquid assets and gold coins (with such coins conservatively valued at \$30,000) between July 2011 and 2012. Defendant also divested himself of additional liquid assets from two accounts with Bank of America, an account at Wells Fargo Bank, and investments with Scott Trade. The whereabouts of such asset, as well as assets previously deposited in an account with Nevada State Bank, are presently unknown. The addendum also revealed that defendant currently owns improved real estate valued at or near \$125,000.00 and, potentially, an additional parcel of unimproved real estate that was not valued.

---

<sup>1</sup> The court considered this filing during the December 13, 2013 hearing pursuant to defendant's request.



1 In defendant's declaration, defendant asserts that he no longer possesses "any financial liquid  
2 assets." At the December 13, 2013 hearing, defendant again asserted that he no longer has any  
3 financial liquid assets.

4 In the notice of and motion for reimbursement and supplemental motion, County Counsel  
5 lists the fees and expenses incurred by the County of Marin. Those fees and expenses total  
6 \$151,526.58. In addition, this court found that the County will have paid \$19,423.11 in additional  
7 costs for the services of private investigator Everson Thompson. Therefore, the total cost of  
8 defendant's legal defense in this case is \$170,949.69.

9 Having read and considered all of the information submitted to it, and having conducted a  
10 review of the defendant's ability to pay all or part of the costs of his legal defense pursuant to Penal  
11 Code Section 987 et seq.,

12  
13 **THIS COURT HEREBY FINDS:**

- 14 1. Defendant has the ability to pay the legal costs, investigative costs, and witness costs  
15 associated with defendant's criminal matter; that defendant has significant assets including  
16 the improved and unimproved real estate as noted by County Counsel; and that defendant has  
17 transferred to his son, David Naso, a minimum of \$295,465.37 in liquid assets and gold  
18 coins.
- 19 2. Defendant received legal and investigative services from the County of Marin and a private  
20 investigator during the course of defendant's criminal matter; those legal and investigative  
21 services were provided to defendant to assist him in his defense of the criminal charges; legal  
22 services costs total \$116,207.70 and represent the 970.75 hours expended by the Marin  
23 County Public Defender at a reduced rate of \$120.00 per hour; and that the number of hours  
24 and the hourly rate are reasonable.
- 25 3. Investigative services costs total \$40,898.28 (including two approved witness fee invoices)  
26 and this court has previously approved the number of hours and invoices from the  
27 investigator; that the witness fees of \$577.51 are reasonable; and that discovery costs  
28 incurred by the District Attorney for defendant in the amount of \$13,266.20 are reasonable.

1 4. The total amount of the costs for the legal services, investigative service, and witness fees is  
2 \$170,949.69.

3 5. Defendant has the present ability to pay the County of Marin \$170,949.69.

4 6. Defendant did dispose of a minimum of \$295,465.37 of his liquid assets between the court's  
5 first inquiries in July 2011 and 2012, and the December 13, 2013 hearing.

6  
7 **BASED UPON THE COURT'S FINDINGS, IT IS HEREBY ORDERED:**

8 1. Defendant is ordered to pay the County of Marin \$170,949.69.

9 2. That defendant is prohibited from making any encumbrances or divesting his real estate  
10 located at:

11 350 Medgar Avenue, Reno NV. The Assessor's parcel number is 570-241-01.

12 3. The County of Marin is authorized to execute a lien in the amount of \$170,949.69 against the  
13 following real property owned by defendant: 350 Medgar Avenue, Reno NV. The  
14 Assessor's parcel number is 570-241-01. Additionally, the County of Marin is authorized to  
15 execute a lien in the amount of \$170,949.60 against any vacant real property owned by  
16 defendant in Reno, Nevada. This Order shall have the same force and effect of a civil  
17 judgment [Penal Code Section 987.8(f)].

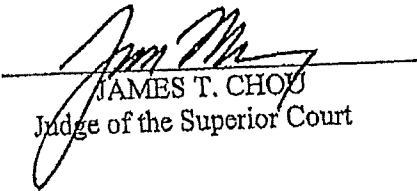
18 4. The County of Marin is authorized to trace the liquid assets divested by defendant to his son,  
19 David, and others and the Court will entertain a motion to seize such assets as having been  
20 fraudulently or otherwise improperly divested to the extent necessary to satisfy the Court's  
21 order that defendant pay the \$170,949.69 to the County of Marin.

22 5. That to assist the County in tracing the assets owned by defendant, the July 27, 2011 report,  
23 the first Kiernan declaration, and the second Kiernan declaration may be released to the  
24 County of Marin for this specific purpose.

25 ///

1  
2 6. The County of Marin is authorized to return to this Court for any orders that are necessary in  
3 facilitating the recovery of \$170,949.69 from defendant.  
4  
5

6 Dated: December 20, 2013.  
7  
8

  
JAMES T. CHOY  
Judge of the Superior Court

COPY

FILED

1 CODE 2610

2 MICHAEL A. ROSENAUER, ESQ.  
3 SBN 2782  
4 ROSENAUER & WALLACE  
5 510 West Plumb Lane, Suite A  
6 Reno, NV 89509  
7 775-324-3303

2014 FEB 13 PM 2:57

JOEY URDUNA HASTINGS  
CLERK OF THE COURT  
BY V. Lloyd  
DEPUTY

6 Attorney(s) for the COUNTY OF MARIN

7  
8 IN THE SECOND JUDICIAL DISTRICT COURT  
9 OF THE STATE OF NEVADA  
10 IN AND FOR THE COUNTY OF WASHOE

11  
12 COUNTY OF MARIN, CALIFORNIA,

13 Plaintiff,

14 v.

15 JOSEPH NASO,

16 Defendant.

Case No.:

CV14 00331

Dept. No.:

4

17  
18  
19 NOTICE OF FILING APPLICATION FOR FOREIGN JUDGMENT AND AFFIDAVIT OF  
20 JUDGMENT CREDITOR

21 TO: Joseph Naso, Defendant; and

22 TO: Pedro Oliveros, Deputy Public Defender, Esquire, attorney for Defendant;

23 PLEASE TAKE NOTICE that an Application for Foreign Judgment, a copy of which is  
24 attached hereto as Exhibit "1", and an Affidavit of Judgment Creditor, a copy of which is attached  
25 hereto as Exhibit "2", were filed in the above-referenced case on the 13<sup>th</sup> day of February, 2014.

26 ///

27 ///

28 ///

1 RA 045

1 1. The name and post office address of the judgment creditor is:

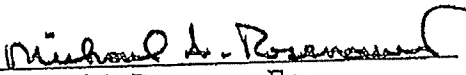
2 County Counsel of Marin County  
3 3501 Civic Center Drive, Suite 275  
4 San Rafael, CA 94903

5 2. The name and post office address of the judgment creditor's attorney is:

6 Jack F. Govi, Assistant County Counsel  
7 Office of the Marin County Counsel  
8 3501 Civic Center Drive, Suite 275  
9 San Rafael, CA 94903

10 AFFIRMATION: Pursuant to NRS 239B.030, the undersigned does hereby affirm that the  
11 preceding document does not contain the Social Security number of any person.

12 DATED this 13<sup>th</sup> day of February, 2014.

13  
14   
15 Michael A. Rosenauer, Esq.  
16 Attorneys for County of Marin  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

COPY

FILED

1 CODE 1075

2 MICHAEL A. ROSENAUER, ESQ.  
3 SBN 2782  
4 ROSENAUER & WALLACE  
5 510 West Plumb Lane, Suite A  
6 Reno, NV 89509  
7 775-324-3303

2014 FEB 13 PM 2:57

JOEY DRONA HASTINGS  
CLERK OF THE COURT  
BY V. Lloyd  
DEPUTY

8 Attorney(s) for the COUNTY OF MARIN

9  
10 IN THE SECOND JUDICIAL DISTRICT COURT  
11 OF THE STATE OF NEVADA  
12 IN AND FOR THE COUNTY OF WASHOE

13  
14  
15 COUNTY OF MARIN, CALIFORNIA,

16 Plaintiff,

17 v.

18 JOSEPH NASO,

19 Defendant.

Case No.:

CV14 00331

Dept. No.:

20  
21  
22 AFFIDAVIT OF JUDGMENT CREDITOR

23  
24  
25 STATE OF NEVADA )

SS:

26 COUNTY OF WASHOE )

27 1. The name and last known address of the Judgment Debtor is:

28 Joseph Naso, c/o Brandy Ebert, Litigation Coordinator

1 RA 047

1 Department of Corrections, State of California  
2 San Quentin State Prison  
3 San Quentin, CA 94964

4 2. The name and last known address of the Judgment Creditor is:

5 County of Marin  
6 c/o Jack F. Govi, Assistant County Counsel  
7 3501 Civic Center Drive, Suite 275  
8 San Rafael, CA 94903

9 3. The foreign judgment that is attached to the Application of Foreign Judgment is valid and  
10 enforceable.

11 4. As of January 16, 2014, \$0.00 of the foreign judgment has been satisfied and \$170,949.69  
12 remains due and owing together with the applicable interest thereon.

13 **AFFIRMATION:** Pursuant to NRS 239B.030, the undersigned does hereby affirm that the  
14 preceding document does not contain the Social Security number of any person.

15 Dated: February 13, 2014

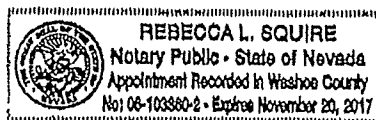
16 ROSENAUER & WALLACE

17 Michael A. Rosenauer  
18 Michael A. Rosenauer, Esq.  
19 Attorney for County of Marin

20 Signed and sworn to (or affirmed) before me on the 13<sup>th</sup> day of February, 2014 by Michael A.  
21 Rosenauer, Esq.

22 Dated this 13<sup>th</sup> day of February, 2014

23 Rebecca L. Squire  
24 NOTARY PUBLIC



1 RA 048

FILED  
Electronically  
CV14-00331  
2021-06-07 04:16:27 PM  
Alicia L. Lerud  
Clerk of the Court  
Transaction # 8483105 : yviloria

**Exhibit “3”**

**EXHIBIT “3”**

**1 RA 049**



3783

IN THE SECOND JUDICIAL DISTRICT COURT FOR THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

COUNTY OF MARIN, CALIFORNIA,

Plaintiff,

v.

JOSEPH NASO,

Defendant.

Case No. CV14-00331

Department No.: 4

JUDGMENT

On February 13, 2014, Plaintiff, County of Marin, California, by and through its attorney, Michael A. Rosenauer, Esq. of Rosenauer & Wallace, filed an exemplified copy of a foreign Judgment pursuant to NRS Chapter 17 registering the December 20, 2013 Order Regarding Payment of Costs of Defense from the Superior Court of California, County of Marin, signed by the Honorable James T. Chou.

On February 13, 2014, Plaintiff filed a Notice of Filing Application for Foreign Judgment and Affidavit of Judgment Creditor wherein Defendant Joseph Naso and his attorney Pedro Oliveros, Deputy Public Defender, County of Marin, were notified of Plaintiff's Application for Foreign Judgment and the Affidavit of Judgment Creditor filed in the instant matter and provided a copy of the same. On February 14, 2014, Plaintiff filed an Affidavit of Mailing evidencing service on February 13, 2014 of a copy of the Filing of Exemplified Copy of Foreign Judgment, Notice of Filing Application of Foreign Judgment and the Affidavit of Judgment Creditor upon Joseph Naso and his attorney by certified mail, return receipt requested. Additionally, Plaintiff

1 filed a Notice of Pendency of Action. On February 20, 2014, a Request for Judgment was filed  
2 requesting this Court issue a Nevada Judgment based upon Plaintiff's domestication of its  
3 California Judgment in Nevada.

4 NRS 17.150(2) permits the holder of a sister state judgment to request a Nevada  
5 judgment such that it can be recorded within the various Nevada counties. Additionally, NRS  
6 17.350 states that the clerk shall treat the foreign judgment in the same manner as a judgment of  
7 the district court of this state, and that a judgment so filed has the same effect and is subject to  
8 the same procedures...and may be enforced or satisfied in like manner. NRS 17.360 states that  
9 no execution or other process for enforcement of a foreign judgment may issue until 30 days  
10 after the date of mailing of the notice of filing. More than thirty (30) days has passed since the  
11 mailing of the notice of filing and no opposition has been filed with this Court.

12 Plaintiff has complied with the provisions of Uniform Enforcement of Foreign Judgments  
13 Act, NRS17.330 et seq., and as such, the California Superior Court Order entered on December  
14 20, 2013 can be treated as a judgment of this Court.

15 Based upon the foregoing and good cause appearing,

16 IT IS HEREBY ORDERED:

17 1. That Defendant Joseph Naso is ordered to pay the County of Marin One Hundred  
18 Seventy Thousand Nine Hundred Forty-Nine Dollars and Sixty-Nine Cents (\$170,949.69).  
19 Judgment in the amount of One Hundred Seventy Thousand Nine Hundred Forty-Nine Dollars  
20 and Sixty-Nine Cents (\$170,949.69) is hereby entered in favor of the County of Marin,  
21 California and against Joseph Naso. This Judgment is inclusive of costs and will bear interest at  
22 the rate set forth by statute until fully paid.

23 2. That Defendant Joseph Naso is prohibited from making any encumbrances or  
24 divesting his real estate located at 350 Medgar Avenue, Reno, Nevada. Assessor's parcel  
25 number 570-241-01.

26 3. That the County of Marin is authorized to execute a lien in the amount of  
27 \$170,949.69 against real property owned by defendant: 350 Medgar Avenue, Reno, Nevada,  
28 APN 570-241-01, and against any vacant real property owned by defendant in Reno, Nevada.

4. That execution or other process of enforcement of this judgment may issue immediately.

DATED this 26 day of March, 2014.

Connie L. Steinheimer  
DISTRICT JUDGE

CERTIFICATE OF SERVICE

CASE NO. CV14-00331

I certify that I am an employee of the SECOND JUDICIAL DISTRICT COURT of the STATE OF NEVADA, COUNTY OF WASHOE; that on the 26 day of March, 2014, I electronically filed the JUDGMENT with the Clerk of the Court by using the ECF system.

I further certify that I transmitted a true and correct copy of the foregoing document by the method(s) noted below:

Personal delivery to the following: [NONE]

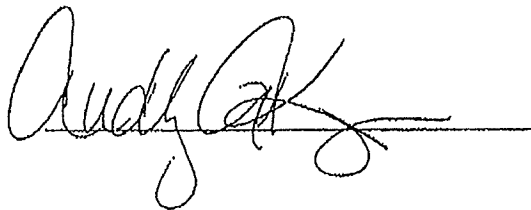
Electronically filed with the Clerk of the Court by using the ECF system which will send a notice of electronic filing to the following:

MICHAEL ROSENAUER, ESQ. for COUNTY OF MARIN

Deposited in the Washoe County mailing system for postage and mailing with the United States Postal Service in Reno, Nevada:

Joseph Naso, in care of Brandy Ebert  
Litigation Coordinator  
San Quentin State Prison  
San Quentin, CA 94964

Pedro Oliveros  
Deputy Public Defender  
County of Marin  
3501 Civil Center Dr., Ste. 139  
San Rafael, CA 94903



IN THE SECOND JUDICIAL DISTRICT COURT FOR THE  
STATE OF NEVADA, IN AND FOR THE COUNTY OF WASHOE

COUNTY OF MARIN, CALIFORNIA  
PLAINTIFF

V.

JOSEPH NASO  
DEFENDANT

CASE NO. CV14-00331

DEPARTMENT NO. 4

MOTION TO STRIKE AND DISMISS FOUL JUDGMENT  
PLEASE SEE EXHIBIT "A"

ON DEC. 13, 2013, IN DEPT. K, OF MARIN COUNTY, CALIF.  
SUPERIOR COURT, HONORABLE JUDGE, JAMES T. CHOU  
PRESIDED OVER A 987 PENAL CODE MONEY HEARING  
TO DECIDE IF DEFENDANT, JOSEPH NASO SHOULD BE  
ORDERED TO PAY MARIN COUNTY \$170,900 FOR THE  
SUPPOSED SERVICES OF A MARIN CTY. DEFENSE ATTORNEY  
AND A PRIVATE INVESTIGATOR. JUDGE CHOU ACCEPTED

## MOTION TO STRIKE AND DISMISS JUDGMENT

THE DEFENDANT, NASO'S PLEDGE TO BE INDIGENT OF HAVING LIQUID ASSETS. AT THE SAME TIME, JUDGE CHOU, DECLARED THAT NASO SHOULD NOT BE REQUIRED TO PAY THE 170,900 TAB. DEFENDANT NASO ALSO STATED, HE FELT THAT THE LARGE MONEY TAB WAS MUCH ENHANCED AND WAS NOT CONFIRMED TO BE CORRECT.

ATTORNEY PEDRO OLIVEROS WAS ONLY NASO'S ADVISORY COUNSEL DURING HIS CASE AND TRIAL. ATTORNEY OLIVEROS, DID NOT SAY ANYTHING ON NASO'S BEHALF OR DEFENSE, DURING THE MONEY HEARING. MR. OLIVEROS WORKS FOR MARIN COUNTY AS A FIRST PRIORITY. THE DEFENDANT NASO WAS NOT REPRESENTED BY ATTORNEY OLIVEROS AT THE DEC. 13, 2013 SESSION, AS WAS FALSELY STATED ON PAGE ONE OF THE FOUL JUDGMENT. THE MARIN COUNTY COUNSEL AND THEIR ATTORNEY, EDWARD KIERMAN OBJECTED TO JUDGE CHOU'S ORDER TO FREE NASO FROM BEING REQUIRED TO PAY THE LARGE MONEY TAB. THE MARIN COUNTY GROUP URGED JUDGE CHOU TO ORDER A JUDGMENT LIEN FOR THE 170,900 AGAINST NASO'S RENO PROPERTY. JUDGE STATED HE COULD NOT AND ~~WAS~~ NOT DO THAT IN HIS COURT.

1 WITH OUT JUDGE CHOU'S KNOWLEDGE A FEW MONTHS  
2 LATER, THE MARIN COUNTY ATTORNEYS TOOK THE  
3 LIBERTY TO CREATE A JUDGMENT LIEN AGAINST  
4 NASOS RENO HOME FOR THE 170,900 AND HAVE  
5 A RENO COURT JUDGE SIGN AND APPROVE THE ORDER.

6 POINTS AND AUTHORITY'S

7 CALIF. JURISPRUDENCE 3RD 40 A THOMPSON-  
8 WEST, 21 ST. CENTURY, RELIEF FROM A VOID  
9 JUDGMENT ORDER, JUDGMENTS 307, 308, 309

10 SUMMARY: A VOID JUDGMENT ORDER IS INVALID,  
11 BECAUSE THE COURT LACKED SUBJECT MATTER  
12 OR PERSONAL JURISDICTION OVER A DEFENDANT  
13 BECAUSE THE JUDGMENT ORDER VIOLATED A  
14 PARTY'S DUE PROCESS RIGHTS TO NOTICE AND  
15 AN OPPORTUNITY TO BE HEARD. WHEN THE  
16 COURT HAS JURISDICTION IN THE FUNDAMENTAL  
17 SENSE, BUT LACKS THE JURISDICTION OR POWER  
18 TO ACT EXCEPT IN A PARTICULAR MANNER OR  
19 TO GIVE CERTAIN PROCEDURAL ADVANCE, ITS  
20 JUDGMENT ORDER IS VOIDABLE AND THUS SUBJECT  
21 TO DIRECT ATTACK. WHEN A COURT LACKS THE  
22 JURISDICTION FUNDAMENTALS ANY JUDGMENT  
23 ORDER IT ISSUES IS VOID.

24  
25 WITH REGARD TO THE TRUE FACTS OF THIS MOTION,  
26 I PRAY THAT THE COURT DISMISSES THIS  
27 JUDGMENT AGAINST ME. JOSEPH NASO. ~~TRA 056~~

PROOF OF SERVICE BY MAIL

I, JOSEPH NASO, DEFENDANT OF THE ENCLOSED

CAPTIONED CASE, CV 14-00331, AND MOTION,

DO DECLARE THAT I MAILED COPIES OF THE

MOTION TO THE FOLLOWING TWO PARTY'S

ON, JUNE 2, 2021

NO. 1) MARIN COUNTY COUNSEL, ROOM 275

3501 CIVIC CENTER DR. SAN RAFAEL, CA. 94903

NO. 2) ROB BONTA, CALIF. ATTORNEY GENERAL

1301 I STREET, SUITE 126 SACRAMENTO,

CALIF. 95814

DATE OF MAILING, JUNE 2, 2021

*John*



CERTIFICATE OF SERVICE

CASE NO. CV14-00331

I certify that I am an employee of the SECOND JUDICIAL DISTRICT COURT of the STATE OF NEVADA, COUNTY OF WASHOE; that on the 24<sup>th</sup> day of March, 2014, I electronically filed the JUDGMENT with the Clerk of the Court by using the ECF system.

I further certify that I transmitted a true and correct copy of the foregoing document by the method(s) noted below:

Personal delivery to the following: [NONE]

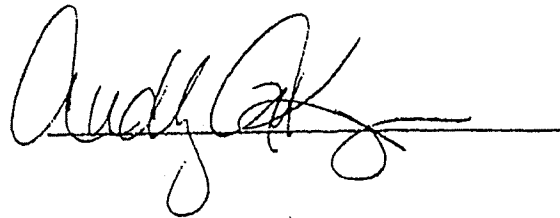
Electronically filed with the Clerk of the Court by using the ECF system which will send a notice of electronic filing to the following:

MICHAEL ROSENAUER, ESQ. for COUNTY OF MARIN

Deposited in the Washoe County mailing system for postage and mailing with the United States Postal Service in Reno, Nevada:

Joseph Naso, in care of Brandy Ebert  
Litigation Coordinator  
San Quentin State Prison  
San Quentin, CA 94964

Pedro Oliveros  
Deputy Public Defender  
County of Marin  
3501 Civil Center Dr., Ste. 139  
San Rafael, CA 94903



1  
2 SECOND JUDICIAL DISTRICT COURT  
3 COUNTY OF WASHOE, STATE OF NEVADA

4 AFFIRMATION  
5 Pursuant to NRS 239B.030 and 603A.040

6 The undersigned does hereby affirm that the preceding document, (*title of document*)

7 MOTION TO STRIKE FOUL JUDGMENT

8 file in case number: CASE NO. CV14-00331

9  
10 (☒ mark one)

11 ☒ Document does not contain the personal information of any person.

12  
13 ☐ Document contains the social security number of a person as required by: (☒ mark one)

14 ☐ A specific state or federal law, to wit: (*write the specific state or federal law*)

15 \_\_\_\_\_  
16 ☐ For the administration of a public program

17 ☐ For the administration for a federal or state grant

18 ☐ Confidential Family Court Information Sheet (NRS 125.130, NRS 125.230, and  
19 NRS 125B.055)

20  
21  
22 DATED this (day) 2 day of (month) JUNE, 20 21

23  
24 Submitted By: (*Your signature*) Maso

25 (*Print your name*) JOSEPH MASO

26 (*Attorney for*) PRO-SE

FILED  
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CV14-00331  
2021-06-08 02:50:56 PM  
Alicia L. Lerud  
Clerk of the Court  
Transaction # 8485237 : bblough

## Exhibit Cover Page

**EXHIBIT NUMBER** \_\_\_\_\_

**1 RA 060**

1 3783

2  
3  
4  
5  
6  
7 IN THE SECOND JUDICIAL DISTRICT COURT FOR THE STATE OF NEVADA  
8 IN AND FOR THE COUNTY OF WASHOE

9 COUNTY OF MARIN, CALIFORNIA,

10 Plaintiff,

11 v.

12 JOSEPH NASO,

13 Defendant.

Case No. CV14-00331

Department No.: 4

14 JUDGMENT

15 On February 13, 2014, Plaintiff, County of Marin, California, by and through its attorney,  
16 Michael A. Rosenauer, Esq. of Rosenauer & Wallace, filed an exemplified copy of a foreign  
17 Judgment pursuant to NRS Chapter 17 registering the December 20, 2013 Order Regarding  
18 Payment of Costs of Defense from the Superior Court of California, County of Marin, signed by  
19 the Honorable James T. Chou.

20 On February 13, 2014, Plaintiff filed a Notice of Filing Application for Foreign Judgment  
21 and Affidavit of Judgment Creditor wherein Defendant Joseph Naso and his attorney Pedro  
22 Oliveros, Deputy Public Defender, County of Marin, were notified of Plaintiff's Application for  
23 Foreign Judgment and the Affidavit of Judgment Creditor filed in the instant matter and provided  
24 a copy of the same. On February 14, 2014, Plaintiff filed an Affidavit of Mailing evidencing  
25 service on February 13, 2014 of a copy of the Filing of Exemplified Copy of Foreign Judgment,  
26 Notice of Filing Application of Foreign Judgment and the Affidavit of Judgment Creditor upon  
27 Joseph Naso and his attorney by certified mail, return receipt requested. Additionally, Plaintiff  
28

EXHIBIT  
A

1 RA 061

1 filed a Notice of Pendency of Action. On February 20, 2014, a Request for Judgment was filed  
2 requesting this Court issue a Nevada Judgment based upon Plaintiff's domestication of its  
3 California Judgment in Nevada.

4 NRS 17.150(2) permits the holder of a sister state judgment to request a Nevada  
5 judgment such that it can be recorded within the various Nevada counties. Additionally, NRS  
6 17.350 states that the clerk shall treat the foreign judgment in the same manner as a judgment of  
7 the district court of this state, and that a judgment so filed has the same effect and is subject to  
8 the same procedures...and may be enforced or satisfied in like manner. NRS 17.360 states that  
9 no execution or other process for enforcement of a foreign judgment may issue until 30 days  
10 after the date of mailing of the notice of filing. More than thirty (30) days has passed since the  
11 mailing of the notice of filing and no opposition has been filed with this Court.

12 Plaintiff has complied with the provisions of Uniform Enforcement of Foreign Judgments  
13 Act, NRS17.330 et seq., and as such, the California Superior Court Order entered on December  
14 20, 2013 can be treated as a judgment of this Court.

15 Based upon the foregoing and good cause appearing,

16 IT IS HEREBY ORDERED:

17 1. That Defendant Joseph Naso is ordered to pay the County of Marin One Hundred  
18 Seventy Thousand Nine Hundred Forty-Nine Dollars and Sixty-Nine Cents (\$170,949.69).  
19 Judgment in the amount of One Hundred Seventy Thousand Nine Hundred Forty-Nine Dollars  
20 and Sixty-Nine Cents (\$170,949.69) is hereby entered in favor of the County of Marin,  
21 California and against Joseph Naso. This Judgment is inclusive of costs and will bear interest at  
22 the rate set forth by statute until fully paid.

23 2. That Defendant Joseph Naso is prohibited from making any encumbrances or  
24 divesting his real estate located at 350 Medgar Avenue, Reno, Nevada. Assessor's parcel  
25 number 570-241-01.

26 3. That the County of Marin is authorized to execute a lien in the amount of  
27 \$170,949.69 against real property owned by defendant: 350 Medgar Avenue, Reno, Nevada,  
28 APN 570-241-01, and against any vacant real property owned by defendant in Reno, Nevada.

1           4.     That execution or other process of enforcement of this judgment may issue  
2 immediately.

3           DATED this 26 day of March, 2014.

4                                 *Connie I. Steinberg*  
5                                 \_\_\_\_\_  
6                                 DISTRICT JUDGE  
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IN THE SECOND JUDICIAL DISTRICT COURT OF THE  
STATE OF NEVADA AND THE COUNTY OF WASHOE

CASE NO. CV14-00331

DEPT. NO. 4

MARIN COUNTY, CALIF.

PLAINTIFF

V.

JOSEPH NASO

DEFENDANT

DEFENDANT'S MOTION  
IN REPLY TO DISMISS  
MARIN COUNTY'S MOTION  
TO OPPOSE DEFENDANT'S  
MOTION TO STRIKE AND VOID  
MARIN'S FULL JUDGMENT.

DEFENDANT, JOSEPH NASO,  
MOVES THIS HONORABLE COURT, TO MAKE A RULING,  
REVERSING THE COURTS ORDER THAT ORIGINALLY  
GRANTED THE PLAINTIFF A SUMMARY JUDGMENT, THAT  
WAS CONCOCTED BY AVOIDING THE RULE OF LAW, AND  
THUS, DENYING THE DEFENDANT HIS RIGHT TO DUE  
PROCESS OF LAW AND HIS RIGHT TO PROCEDURAL LAW  
AND JURISDICTION. FIRST OFF, THE DEFENDANT WILL  
CLEAR THE SMOKE AND TRY TO INTERPRET THE DOUBLE  
TALK OF ATTORNEY, ROSENAUER, WHO IS A COHORT AND  
AGENT FOR THE MARIN COUNTY, MONEY GRABBERS.

1 RA 964



ATTORNEY ROSENAUER TALKS ABOUT A LOT OF NON-RELEVANT MATERIAL, ISSUES AND TRIVIAL EVENTS. HE TALKS ABOUT MY SON AND I, OF WHAT WE DID WITH OUR MONEY. HOW MUCH WE HAD ON A VARIETY OF DATES, BUT ALL BEFORE DEC. 2013. THIS CASE AND MY MOTION IS NOT ABOUT MONEY. ITS ABOUT AN ILLEGALLY OBTAINED JUDGMENT LIEN AGAINST ME AND MY RENO NV. PROPERTY. BEFORE I GO ON I WANT TO GET ONE THING VERY CORRECT FOR ALL TO GRASP. PEDRO OLIVEROS IS NOT MY LAWYER OF RECORD. HE NEVER WAS AND NEVER WILL BE. YET HE CONTINUOUSLY IS FALSELY NAMED TO BE MY LAWYER. BY ATTORNEY ROSENAUER AND MARIN COUNTY. IF THEY CAN'T GET THAT MUCH CORRECT, HOW CAN THEY BE ETHICAL WITH MONEY CLAIMS. MR. OLIVEROS WAS ONLY A ADVISORY COUNSEL FOR THE DEFENDANT, NASO DURING HIS CRIMINAL CASE AND TRIAL. NOTHING MORE. NOT HIS LAWYER. OLIVEROS WAS HIRED BY THE TRIAL JUDGE. NOT BY THE DEFENDANT WHO WAS OPPOSED TO THIS ACT. THE DEFENDANT WAS ALWAYS ENGAGED AS PRO SE.



MR. OLIVEROS ADVISORY SERVICE WAS MOSTLY BEHIND GLASS VISITS AT THE MARIN COUNTY JAIL IN 2013 PRIOR TO TRIAL. HE ADVISED ME SOME ON JURY SELECTION. THERE WAS NO WRITTEN FORMAT OF THE VISITS, WHICH WERE SET TO BE FOR ONE HOUR, ON CERTAIN DAYS OF A WORK WEEK. I DID NOT KEEP RECORDS. BUT I DO FIRMLY RECALL THAT PEDRO SELDOM WOULD COME ON TIME TO START HIS HOUR VISIT. OFTEN TIMES HE WOULD BE AS MUCH AS  $\frac{1}{2}$  HOUR OR MORE LATE THEN HE WOULD DEPART EXACTLY AT WOULD HAVE BEEN THE END OF ANY HOUR, TO REPORT TO HIS OFFICE. DURING MANY OF HIS  $\frac{1}{2}$  HOUR TO 15 MINUTE VISITS, PEDRO TALKED MUCH ABOUT THE NFL RAIDERS AND HIS 4 DOGS. DURING TRIAL HE WAS RESTRICTED BY THE TRIAL JUDGE FROM TALKING TO ME, AT THE DEMAND OF THE PROSECUTION. THE LEGAL SERVICES FOR MR. OLIVEROS AT 970 HOURS AT 120.00 HR. = 116,207 AT THE DEC. 13, 2013 987 HEARING WAS MOSTLY ENHANCED AND GREATLY FABRICATED. GO TO PAGE 864

DURING THE DEC. 13, 2013 987 HEARING, WHEN THE TOTAL TAB FOR THE PUBLIC DEFENDER ADVISORY SERVICE WAS PRESENTED, MR. OLIVEROS AGREED. HE WORKS FOR MARIN COUNTY AND LIKELY GAVE THE COUNTY THE CHARGE RECORDS. I WAS NOT ALLOWED MY OPINION. WHICH WOULD HAVE BEEN A FIRM OBJECTION TO THE ADVISORY TAB. THE DEFENDANT'S CASE INVESTIGATOR, EVERSON THOMPSON REFUSED TO TESTIFY AND RAN OUT OF THE COURT ROOM. JACK GOVI, OF THE MARIN COUNTY COUNSEL, SPOKE OUT VILE, UNWARRANTED REMARKS ABOUT THE DEFENDANT'S TRIAL CASE. THE CLIMATE OF 987 MONEY HEARING TURNED OUT TO BE A DISPUTABLE AND PENDING PROMOTION. ONE THING THAT IS A TRUE FACT IS: THE DEFENDANT PLEDGED TO THE JUDGE, CHOU, HE IS CURRENTLY INDIGENT OF LIQUID ASSETS. HE MADE NO MENTION OF OWNING PROPERTY IN RENO, NV. IT WAS MARIN COUNTY WHO BROUGHT UP THE PROPERTY, WHICH IS NOT LIQUID. ATTORNEY ROSENAUER KNOWINGLY MISLEADS THE COURT WITH HIS PLAY OF WORDS. ALSO, THE 987 HEARING WAS NOT A JUDGMENT HEARING. REGARDLESS OF MR. ROSENAUER'S SISTER STATE SCHEME, A JUDGMENT LIEN IS ONLY VALID IF APPROVED IN A PROPER JUDGMENT HEARING AND JURISDICTION.



MARIN COUNTY, CALIFORNIA, THE PLAINTIFF OF THE FOUL JUDGMENT AND ITS AUTHOR AND THEIR ATTORNEY, MICHAEL ROSENAUER HAVE PERPETRATED DECEIT AND MISGUIDANCE ON THE COURT WHO APPROVED THE JUDGMENT IN RENO, NV. ON MARCH 26, 2014. THE JUDGMENT WAS NOT THE PRIOR RESULT OF A PROPER JUDGMENT HEARING IN A PROPER JURISDICTION. THE DEC. 13, 2013 987 HEARING IN MARIN COUNTY HAD NO STANDING ALSO OF THE JUDGMENT. MR. ROSENAUER, KEEPS BUSY WITH MORE ILLEGAL ABUSE AND MALFEASANCE TOWARD THE DEFENDANT AND HIS CIVIL RIGHTS TO POSSESS LEGAL MONEY PRIOR TO 2013. HE CONTINUES TO FALSIFY MORE MOTIONS LIKE THE ONE HE HAS JUDGE & HOU APPROVE IN EFFORT FOR MARIN COUNTY TO GRAB THE DEFENDANTS LIQUID ASSETS HE ONCE HAD PRIOR TO DEC. 2013. PEDRO OLIVEROS IS NOT MY LAWYER. HE KEEPS ON INSULTING ME. PEDRO HIMSELF TOLD ME OF HOW LAWYERS LIKE ROSENAUER WILL CHEAT CLIENTS AND TAKE THEIR MONEY AT WILL. AFTER I WAS SENTENCED AND ARRIVED AT PRISON NOV 26 2013, WITHOUT MY KNOWLEDGE, PEDRO GAVE AWAY 1000'S OF MY DISCOVERY TRANSCRIPTS, I WAS CHARGED WITH. PEDRO SHOULD HAVE TO PAY THE COUNTY FOR IT. OR HIS OFFICE SHOULD.

1 RA 068

## DEFENDANTS FINAL SUMMARY OF FACTS

THE DEFENDANT HAS COVERED MUCH OF WHAT WENT ON AT THE DEC. 13, 2013 MONEY HEARING IN JUDGE CHOI'S MARIN COUNTY COURT. ONE THING I FORGOT TO MENTION: DURING THE HEARING, THERE WAS NO COURT RECORDER, NOR TRANSCRIPTS THAT I AM AWARE OF. ALSO, I COULD NOT OBTAIN A COPY OF THE MINUTES IF THERE WERE ANY. WITH REGARD TO THE MARIN COUNTY COUNSEL'S DEMAND TO BE PAID FOR THE DEFENDANT'S SUPPOSED CASE AND TRIAL SERVICES, LET'S START WITH THE TRIAL JUDGE'S COURT TO PAY FOR MR. OLIVEROS SO CALLED ADVISORY SERVICE. IT WAS THE JUDGE WHO HIRED PEDRO. AND LET'S HAVE JUDGE CHOI'S COURT PAY FOR THE INVESTIGATOR'S FEES THAT HE APPROVED. AND HAVE MR. OLIVEROS PAY FOR THE 1000'S OF TRANSCRIPTS HE GAVE AWAY, THAT THE DEFENDANT NEVER DID SEE. THE \$170,900 JUDGMENT AGAINST THE DEFENDANT WAS FOUL FROM THE START: NOT LEGALLY OBTAINED. IT SHOULD BE DISMISSED. I PRAY THAT THE COURT WILL FAVORABLY CONSIDER THE FOREGOING AND GRANT MY REPLY MOTION. I HEREBY AFFIRM THAT THESE ENCLOSED PAGES AND MOTION DO NOT CONTAIN ANY PERSONS SOCIAL SECURITY NO. RA 069

DECLARATION (VERIFIED) M10



## PROOF OF SERVICE BY MAIL

E. JOSEPH NASO, DEFENDANT OF THE  
ENCLOSED CAPTIONED CASE, CV14-00331.

DO DECLARE THAT I MAILED COPY'S OF  
THE ENCLOSED MOTION TO THE TWO PARTY'S  
LISTED BELOW, ON JUNE 17, 2021

*E. Naso*

1) MARIN COUNTY COUNSEL, ROOM 275  
3501 CIVIC CENTER DR. SAN RAFAEL CA. 94903

2) ROB BONTA, CALIF. ATTORNEY GENERAL  
1300 I ST. SUITE 126 SACRAMENTO, CA. 95814

DATE OF MAILING FROM SAN QUENTIN PRISON:

JUNE 17 2021

*E. Naso*

1 RA 070

1 CODE: 2840  
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8 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
9 IN AND FOR THE COUNTY OF WASHOE

10 \* \* \* \* \*

11 COUNTY OF MARIN, CALIFORNIA,  
12 Plaintiff,

CASE NO.: CV14-00331

13 v.

DEPT. NO.: 4

14 JOSEPH NASO,  
15 Defendant.

16 ORDER DENYING MOTION TO STRIKE AND DISMISS FOUL JUDGMENT

17 The Court has reviewed Mr. Naso's "Motion to Strike and Dismiss Foul  
18 Judgment" filed June 8, 2021, the Opposition filed by Marin County on June 7, 2012  
19 and the Reply thereto filed June 22, 2021.<sup>1</sup> The Court also reviewed the entirety of  
20 its file including its Judgment filed March 26, 2013.

21 This matter stems from a Judgment entered by The Honorable James T. Chou,  
22 Judge of the Superior Court of California, on December 20, 2013. The December 20,  
23 2013 Judgement emanates from a post-conviction hearing focusing upon Mr. Naso's  
24 obligation to reimburse Marin County for expenses incurred on behalf of Mr. Naso  
25

26  
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28 <sup>1</sup> It appears as the anomaly in filing dates stems from the fact that Mr. Naso's Motion was served May 9, 2021 but was not filed until June 8, 2021. This time difference was probably caused by the fact that Mr. Naso's Motion was served by mail. These dates are irrelevant to the Court's decision.

1 while defending his criminal case alleging special circumstances murder. *See Order*  
2 *Regarding Payment of Costs of Defense* filed December 20, 2013. Mr. Naso argues  
3 that Judge Chou declared from the bench that Mr. Naso should not be required to  
4 pay the \$170,949.69 in expenses spent by Marin County for services of defense  
5 counsel, transcripts, investigation, and witness fees incident to his criminal defense.  
6 Motion P.2., 1.3-9. Therefore, and inexplicably, the written Judgment entered by  
7 Judge Chou on December 20, 2013, was improper.

9 Marin County, in Opposition, submitted a copy of Judge Chou's December 20,  
10 2013 Judgment, arguing that the document was executed by Judge Chou and  
11 therefore, properly entered. The California Judgment qualified as a Sister State  
12 Judgment and pursuant to the United States Constitution Article IV, §1 could be  
13 recognized in Nevada. Nevada utilizes the Uniform Enforcement of Foreign  
14 Judgments Act which is codified at NRS 17.350 *et seq.* Marin County had complied  
15 with all statutory requirements. *See Judgment of Second Judicial District Court of*  
16 *Nevada P.2., 1.12-14.* Judge Chou's December 13, 2013 Judgment was therefore a  
17 valid Nevada Judgment.

19 As authority, Mr. Naso directs the Court to Cal. Jur. 3<sup>rd</sup> Vol. 40A regarding  
20 Void Judgments arguing that judgments entered by Courts that lacked subject  
21 matter jurisdiction or personal jurisdiction over the defendant are void. Motion P.3,  
22 1. 10-11. When a Court has violated the Defendant's due process rights by not  
23 providing Notice or Right to be Heard, the judgment is voidable. Motion P. 3, 1. 7-22.

25 Mr. Naso's Motion is a direct attack upon the Nevada Judgment. He asks that  
26 it be set aside not because of a procedural irregularity in Nevada, but because it was  
27 based upon a Judgment erroneously entered in California by Judge Chou. Nevada  
28

1 Rule of Civil Procedure 60 addresses the entry of judgments and subsection (b)(4)  
2 focuses upon void judgments. NRCP 60(c)(1) requires that any Motion to set aside a  
3 Judgment under Rule 60(b)(4) must be brought within a reasonable time.<sup>2</sup> While  
4 subject to judicial discretion, the Nevada Supreme Court has found that two years is  
5 an unreasonable period of time. *Deal v. Baines*, 110 Nev. 509, 874 P.2d 775 (Nev.  
6 1994). In *Baines*, the Supreme Court found that almost two years between the entry  
7 of the Judgment and the Motion to Set Aside the Judgment was too long when the  
8 Counterclaimant continued to execute on the Counterclaim Defendant's assets for the  
9 intervening twenty months. *Baines*, 110 Nev. 509, 512, 874 P.2d 778.

11 In the matter before this Court, Judge Chou's Judgment was established in  
12 Nevada on March 26, 2014. Mr. Naso brought his Motion to set the Judgment aside  
13 on May 9, 2021.<sup>3</sup> More than 7 years had passed from the date the Nevada Judgment  
14 was entered and Mr. Naso's Motion to set the Judgment aside. Moreover, and similar  
15 to the facts in *Baines*, Mr. Naso had notice of the Nevada Judgment by way of the  
16 Nevada levies upon his property and the fact that the Nevada properties are  
17 enumerated within both the Nevada and California Judgments. It is undisputed that  
18 Mr. Naso received copies of both Judgments and most especially the moving paper in  
19 Nevada and the Nevada Judgment itself. *See e.g.* Certificate of Service attached to  
20 the Nevada Judgment dated March 26, 2014. In fact, Mr. Naso admits that he was at  
21 the December 13, 2013 hearing regarding his assets held before Judge Chou wherein  
22 his Nevada assets were specifically discussed. Motion P.2, l. 5-6. Mr. Naso therefore

---

26  
27 <sup>2</sup> NRCP 60(b)(1) through (3) Motions must be brought within six months from the date of the Judgment. NRCP  
60(c)(1).

28 <sup>3</sup> The Court could apply the Motion's filing date of June 8, 2021 but applying the date of service provides all  
deference to Mr. Naso as it decreases the time between the entry of the Nevada Judgment and his Motion.



1 cannot now argue that neither the Nevada nor California Judgments were entered  
2 without his knowledge. Mr. Naso was placed on actual notice that his Nevada assets  
3 were at risk at Judge Chou's December 13, 2013 hearing and by way of the resulting  
4 December 20, 2013 Judgment. Mr. Naso received both procedural due process and  
5 had the opportunity to be heard on December 13, 2013. The California Judgment is  
6 neither defective nor void.  
7

8 While the Court can deny Mr. Naso's Motion on this basis alone, the Court also  
9 must observe that Mr. Naso is attacking the sister state (Nevada) judgment, not the  
10 domiciliary (California) judgment. An attack upon the California Judgment would  
11 have been filed in Marin County, California. Therefore, the only arguments available  
12 to Mr. Naso are those which attack the validity of the domiciliary (California)  
13 judgment. *See e.g. City of Oakland v. Desert Outdoor Advertising*, 127 Nev. 533 at  
14 536, 267 P.3d 48 at \_\_\_\_, (Nev. 2011).  
15

16 Here, Mr. Naso's only criticism of the Marin County Judgment entered by  
17 Judge Chou is that the California Judgment was somehow entered without Judge  
18 Chou's knowledge or was entered by mistake. In reviewing Judge Chou's Judgment,  
19 it is clear that it was not entered by mistake. The Judgment specifically finds that  
20 Mr. Naso was not indigent when he made the contrary representation at the  
21 commencement of his defense to the charge of special circumstances murder. Judge  
22 Chou notes that Mr. Naso disposed of a minimum of \$295,465.37 in liquid assets prior  
23 to the December 13, 2013 hearing. Judge Chou's Order further enumerates some of  
24 Mr. Naso's Nevada real property assets which are subject to lien and subsequent levy.  
25 California Order Regarding Payment of Costs of Defense P. 3, l. 14 to P. 4, l. 24.  
26 Nothing could be mistaken, especially by Judge Chou's where he used the words,  
27  
28

1 "Defendant is Ordered to pay the County of Marin \$170,949.69". California Order P.4,  
2 1.8.

3 Therefore, based upon the foregoing, this Court finds that Mr. Naso's "Motion  
4 to Strike and Dismiss Foul Judgment" is untimely and not supported by applicable  
5 law. Mr. Naso's "Motion to Strike and Dismiss Foul Judgment" is hereby DENIED.  
6

7 DATED this 17 day of AUGUST, 2021.  
8

9  
10 Connie J. Steinheimer  
11 DISTRICT JUDGE  
12

13 Prepared by:

14 MICHAEL A. ROSENAUER, ESQ.  
15 State Bar No. 2782  
16 MICHAEL A. ROSENAUER, LTD.  
17 510 West Plumb Lane, Suite A  
18 Reno, Nevada 89509  
19 (775) 324-3303 Telephone  
20 (775) 324-6616 Fax  
21 michael@mrosenauer.com  
22  
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26  
27  
28

Attorney for the County of Marin

1 CODE: 2540  
2 MICHAEL A. ROSENAUER, ESQ.  
3 State Bar No. 2782  
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6 Reno, Nevada 89509  
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9 michael@mrosenauer.com

10 Attorney for the County of Marin

11 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
12 IN AND FOR THE COUNTY OF WASHOE

13 \*\*\*\*\*

14 COUNTY OF MARIN, CALIFORNIA, CASE NO.: CV14-00331  
15 Plaintiff,  
16 v. DEPT. NO.: 4  
17 JOSEPH NASO,  
18 Defendant.

19 NOTICE OF ENTRY OF ORDER DENYING MOTION TO STRIKE AND  
20 DISMISS FOUL JUDGEMENT

21 PLEASE TAKE NOTICE that on the 17<sup>th</sup> day of August 2021, an Order  
22 Denying Motion to Strike and Dismiss Foul Judgment (the "Order") was entered in  
23 the above-captioned matter.

24 A copy of the Order is attached hereto as Exhibit "1".

25 **AFFIRMATION:** Pursuant to NRS 239B.030, the undersigned does hereby affirm  
26 that the preceding document does not contain the Social Security number of any  
27 person.

28 DATED this 17<sup>th</sup> day of August 2021.

MICHAEL A. ROSENAUER, LTD.

/s/ Michael A. Rosenauer, Esq.  
MICHAEL A. ROSENAUER, ESQ.

**1 RA 076**

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Michael A. Rosenauer, Ltd., 510 West Plumb Lane, Suite A, Reno, NV 89509, and that on this date I served the foregoing document(s) described as follows:

NOTICE OF ENTRY OF ORDER DENYING MOTION TO STRIKE AND  
DISMISS FOUL JUDGEMENT

on the party(s) set forth below by:

XXX

Electronic Mailing via Second Judicial District Court  
CM/ECF System to all those persons listed on the ECF  
Confirmation Sheet.

XXX

Placing an original or true copy thereof in a sealed  
envelope placed for collection and mailing in the  
United States Mail, at Reno, Nevada, postage paid,  
following ordinary business practices.

addressed as follows:

Joseph Naso, #AR-9737  
CSP-SQ 1-EB-80  
San Quentin State Prison  
San Quentin, CA 94964

Rob Bonta, Attorney General  
1300 "I" Street  
Suite 126  
Sacramento, CA 95814

Petro Oliveros  
Deputy Public Defender  
County of Marin  
3501 Civic Center Drive, Suite 139  
San Rafael, CA 94903

DATED this 18<sup>th</sup> day of August 2021.

/s/ Rebecca Squire  
REBECCA SQUIRE

County of Marin California, Plaintiff

v.

Joseph Naso, Defendant

Case No.: CV14-00331

Dept. No: 4

Exhibit Number	Description	Pages
1.	Order Denying Motion to Strike and Dismiss Foul Judgment	5

FILED  
Electronically  
CV14-00331  
2021-08-17 02:06:53 PM  
Alicia L. Lerud  
Clerk of the Court  
Transaction # 8599827

**Exhibit “1”**

**EXHIBIT “1”**

**1 RA 079**

1 CODE: 2840  
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8 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
9 IN AND FOR THE COUNTY OF WASHOE

10 \* \* \* \* \*

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13 recognized in Nevada. Nevada utilizes the Uniform Enforcement of Foreign  
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15 with all statutory requirements. *See* Judgment of Second Judicial District Court of  
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1 Rule of Civil Procedure 60 addresses the entry of judgments and subsection (b)(4)  
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18 Mr. Naso received copies of both Judgments and most especially the moving paper in  
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26  
27 <sup>2</sup> NRCP 60(b)(1) through (3) Motions must be brought within six months from the date of the Judgment. NRCP 60(c)(1).

28 <sup>3</sup> The Court could apply the Motion's filing date of June 8, 2021 but applying the date of service provides all deference to Mr. Naso as it decreases the time between the entry of the Nevada Judgment and his Motion.

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6 neither defective nor void.  
7

8 While the Court can deny Mr. Naso's Motion on this basis alone, the Court also  
9 must observe that Mr. Naso is attacking the sister state (Nevada) judgment, not the  
10 domiciliary (California) judgment. An attack upon the California Judgment would  
11 have been filed in Marin County, California. Therefore, the only arguments available  
12 to Mr. Naso are those which attack the validity of the domiciliary (California)  
13 judgment. *See e.g. City of Oakland v. Desert Outdoor Advertising*, 127 Nev. 533 at  
14 536, 267 P.3d 48 at \_\_\_\_, (Nev. 2011).  
15

16 Here, Mr. Naso's only criticism of the Marin County Judgment entered by  
17 Judge Chou is that the California Judgment was somehow entered without Judge  
18 Chou's knowledge or was entered by mistake. In reviewing Judge Chou's Judgment,  
19 it is clear that it was not entered by mistake. The Judgment specifically finds that  
20 Mr. Naso was not indigent when he made the contrary representation at the  
21 commencement of his defense to the charge of special circumstances murder. Judge  
22 Chou notes that Mr. Naso disposed of a minimum of \$295,465.37 in liquid assets prior  
23 to the December 13, 2013 hearing. Judge Chou's Order further enumerates some of  
24 Mr. Naso's Nevada real property assets which are subject to lien and subsequent levy.  
25 California Order Regarding Payment of Costs of Defense P. 3, l. 14 to P. 4, l. 24.  
26 Nothing could be mistaken, especially by Judge Chou's where he used the words,  
27  
28

1 "Defendant is Ordered to pay the County of Marin \$170,949.69". California Order P.4,  
2 1.8.

3 Therefore, based upon the foregoing, this Court finds that Mr. Naso's "Motion  
4 to Strike and Dismiss Foul Judgment" is untimely and not supported by applicable  
5 law. Mr. Naso's "Motion to Strike and Dismiss Foul Judgment" is hereby DENIED.  
6

7 DATED this 17 day of AUGUST, 2021.  
8

9   
10 DISTRICT JUDGE  
11

12  
13 Prepared by:

14 MICHAEL A. ROSENAUER, ESQ.  
15 State Bar No. 2782  
16 MICHAEL A. ROSENAUER, LTD.  
17 510 West Plumb Lane, Suite A  
18 Reno, Nevada 89509  
19 (775) 324-3303 Telephone  
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21 michael@mrosenauer.com  
22

23 Attorney for the County of Marin  
24  
25  
26  
27  
28

IN THE SECOND JUDICIAL COURT OF THE STATE OF  
NEVADA FOR THE COUNTY OF WASHOE

MARIN COUNTY CALIF. CASE NO. CV14-00331

PLAINTIFF

DEPT. 4

V

JOSEPH NASO

DEFENDANT

REPLY TO MARIN COUNTY'S

OPPOSITION OF THE

DEFENDANTS MOTION TO

STRIKE FOWL JUDGMENT

PLEASE TAKE NOTICE OF THE DEFENDANTS RESPONSE  
WITH THE TRUTHFUL AND ACTUALITY OF THE EVENTS:  
I DRAW YOUR ATTENTION TO LINE 21 OF PAGE ONE  
OF ATTORNEY ROSENALERS, MOTION TO DENY DEFENDANTS  
MOTION TO STRIKE FOWL JUDGMENT: DEFENDANT HAS  
NO KNOWLEDGE NOR EVIDENCE THAT JUDGE CHOI  
HAD ENTERED A JUDGMENT ORDER ON DEC. 20, 2013.  
DURING THE DEC. 13, 2013 987 MONEY HEARING, JUDGE  
CHOI STATED THAT MARIN COUNTY MAY PURSUE A  
JUDGMENT ELSEWHERE, BUT NOT IN HIS COURT. THE  
SISTER STATE ACT DOES NOT JUSTIFY A JUDGMENT,  
NO MATTER WHAT STATE, SISTER OR COURT, WON'T WORK,  
IF THE DEFENDANT IS NOT PRESENT IN A JUDGMENT  
HEARING OR REPRESENTED BY COUNSEL TO DEFEND  
HIMSELF. REGARDLESS OF WHAT JUDGE WAS ORDERED TO  
DO, THE JUDGMENT WAS ILLEGALLY OBTAINED. NOT VALID.

1 RA 085

1 MR. ROSENBAUM'S MOTION WITH A VARIETY OF  
2 SUBJECTS WITH A VARIETY OF WORDS, WITH  
3 NO DOUBT, IS AN ATTEMPT TO SWAY THE COURT  
4 TO FAVOR MARIN COUNTY. BUT IT WON'T GO. THE COURT  
5 IS WISE TO THE FACT THAT THERE IS NO PROOF TO  
6 JUSTIFY THE FOUL JUDGMENT. YES THE JUDGMENT  
7 WAS SERVED ON ME IN MARCH 2014. AND 6 YEARS  
8 LATER, I DECIDE TO LEGALLY OPPOSE IT. I'VE BEEN  
9 IN PRISON TRYING TO ADJUST. I'VE HAD AILMENTS.  
10 1/2 DOZEN EXPENSIVE LAW BOOKS I CAME TO PRISON  
11 WITH IN NOV. 2013, WERE SEIZED. NEVER SAW THEM.  
12 BUT I HAVE A GOOD MEMORY, AND ESPECIALLY OF THE  
13 2013 MONKEY HEARING, THAT HAD NO COURT REPORTER,  
14 NOR TRANSCRIPTS. I WAS THERE. MR. ROSENBAUM  
15 WAS NOT. JUDGE CHOU NEVER MADE ANY MENTION  
16 ABOUT 295,000 I MAY HAVE HAD BEFORE OR AFTER.  
17 WHAT I HAD OR DID 2 OR 3 YEARS BEFORE JUDGE  
18 CHOU'S 2013 HEARING IS NOT RELEVANT. YES, I WAS  
19 A PRO-SEI DEFENDANT IN THE MURDER TRIAL. BUT I DID  
20 NOT HAVE ANY COUNSEL AT THE DEC. 13, 2013 HEARING,  
21 WHICH WAS A SEPERATE 987 HEARING. PEDRO OLIVERAS WAS  
22 THERE AND JUST SAT. HE SAID, NOR DID ANYTHING IN MY  
23 BEHALF. PEDRO OR WHO EVER CLAIMS HE IS MY LAWYER  
24 IS A BIG LIAR. I TOLD THE TRUTH THAT I WAS INDIGENT  
25 OF LIQUID ASSETS DURING THE HEARING. AND I DID NOT HAVE  
26 ANY LEGAL COUNSEL. I ASK THE HONORABLE COURT TO  
27 APPROVE MY MOTION TO STRIKE THE FOUL JUDGMENT. **186**

28 RESPECTFULLY SUBMITTED: *[Signature]*

1 ADDENDUM TO ENCLOSED MOTION, CASE CV-1400331

2  
3 DEFENDANT, JOSEPH NASO, IS SURPRISED THAT THE  
4 COURT ACTED SO SWIFTLY WITH A DENIAL OF HIS  
5 MOTION TO STRIKE THE FOUL JUDGMENT, BEFORE HE HAD  
6 MINIMUM TIME TO RESPOND TO THE AUG. 17, 2021  
7 MOTION AGAINST HIM. THE DEFENDANT NOW, YIELDS  
8 HIS WORTHY MOTION, WITH THIS ADDENDUM, UNDER  
9 APPEAL TO THE COURT. IT SEEMS DENIAL WAS PRE-SET.

10  
11 WITH REGARD TO ATTORNEY ROSENBERG'S, AUG. 17, 2021  
12 MOTION, THAT CLAIMS THE DEFENDANT RECEIVED DUE PROCESS  
13 AND HAD A CHANCE TO BE HEARD ON DEC. 13, 2013; THIS CLAIM  
14 IS FALSE. ALSO THE DEFENDANT IS NOT AWARE OF A JUDGMENT  
15 HEARING IN JUDGE CHOU'S COURT ON DEC. 20, 2013 THIS CLAIM  
16 IS FALSE. THERE IS NO PROOF THAT THE DEFENDANT WAS  
17 PRESENT OR REPRESENTED BY COUNSEL IN ANY SEPERATE,  
18 DISTINGUISHED JUDGMENT HEARING, IN ANY STATE.

19  
20 WITH REGARD TO THE MARIN COUNTY, 170,949. EXPENSE,  
21 THE DEFENDANT HAS NOT SEEN VERIFICATION OF THIS TALLY.

22  
23 THE CASE: DEAL V. BAINES 110, N.B.V. 509, 512 874-P.2D., MAY  
24 NOT APPLY TO A MAN IN PRISON OF ANOTHER STATE. THERE  
25 IS NO STATUTE OF TIME TO DEFEND AGAINST A INVALID  
26 JUDGMENT WHILE IN PRISON OF ANOTHER STATE. THE  
27 DEFENDANT FEELS THAT THE AUG. 17, 2021 DENIAL SHOULD

28 RE REPEATED DEFENDANT'S COUNCILMAN. 17 RA 087

AFFIRMATION AT BOTTOM OF THIS PAGE

PROOF OF SERVICE

I, JOSEPH NASO, DEFENDANT OF THE  
ENCLOSED CAPTIONED MOTION, AND  
WITH CASE NO. CV14-00331, DID, SEND  
BY U.S. MAIL, COPIES OF THE MOTION TO:

1) ROB BONTA, ATTORNEY GENERAL, SUITE 126  
1300 "I" STREET SACRAMENTO, CA. 95814

AND TO:

2) ATTORNEY, MICHAEL ROSENAUER, SUITE A  
510 WEST PLUMB LANE, RENO, NV. 89509

DATE OF MAILING: AUGUST 26, 2021

AFFIRMATION

AFFIRMATION PURSUANT TO NRS 239B.030 AND  
603A.040

I, JOSEPH NASO, DECLARES THAT THE S.S. NO.  
DOES NOT APPEAR OF ANY PERSON, NAMED  
WITHIN ANY OF THE ENCLOSED PAPERS.

JOSEPH NASO, ~~OF NURE~~

DATED: AUGUST 26, 2021

Joseph Naso, #AR-9737  
San Quentin State Prison  
1-EB-80  
San Quentin, CA 94974

FILED

SEPT. 17, 2021

SEP 24 2021

ALICIA L. LERUD, CLERK

By: [Signature]  
DEPUTY CLERK

IN THE SECOND JUDICIAL DISTRICT COURT OF THE  
STATE OF NEVADA, AND THE COUNTY OF WASHOE

MARIN COUNTY, CALIF.

PLAINTIFF

VS.

JOSEPH NASO

DEFENDANT

CASE, CV14-00331

DEPT. 4

NOTICE OF APPEAL

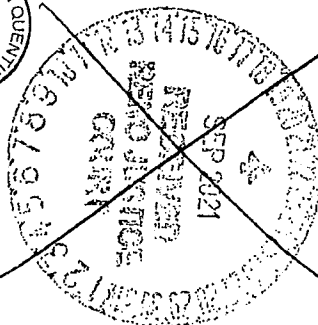
DEFENDANT, JOSEPH NASO, HEREBY GIVES NOTICE  
THAT HE WILL BE FILING AN APPEAL ON THE DISMISSAL  
OF HIS MOTION TO STRIKE A FOUJ. JUDGMENT,  
RULED BY THE ABOVE COURT ON AUG. 17, 2021

JOSEPH NASO

[Signature]

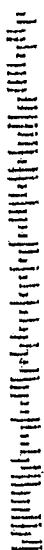


Joseph Naso, #AR-9737  
CSP-SQ 1-EB-80  
San Quentin, CA 94974



PLEASE SEND  
ME BACK A  
FILE COPY OF  
THIS NOTICE.  
THANK YOU.

8950131528 0026



Dist. Court  
RENO JUSTICE COURT  
1 SIERRA STREET  
RENO, NEVADA,  
89501

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1 RA 090