

Ali Shahrokhi  
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*Appearing in Proper Person*

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

ALI SHAHROKHI,  
Appellant,

**vs.**

KIZZY BURROW,  
Respondent.

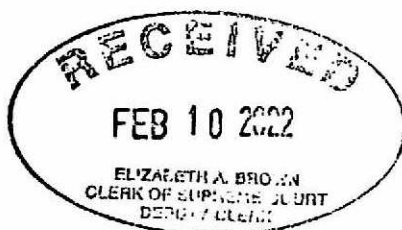
District Court Case D-18-581208-P  
Supreme Court Case No. 83726

**FILED**

FEB 10 2022

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

## “Reply to Fast Track Response”



22-04554

### **FIRST ARGUMENT:**

Once a notice of appeal is timely and properly filed, the district court is divested of jurisdiction to enter further orders granting relief on the same subject matter. See Mack-Manley v. Manley, 122 Nev. 849, 855, 138 P.3d 525, 529-30 (2006). The constitutionality of the NRS 125C is pending on appeal before this honorable court on appeal case No. 81978, 82245. Therefore The district court is divested out of jurisdiction on any orders arising or related to NRS 125C.

Since the District Court is divested of jurisdiction on NRS 125C, any orders that are related or have arisen from NRS 125C by the District Court are void and should be vacated. {See Mack-Manley v. Manley, 122 Nev. 849, 855, 138 P.3d 525, 529-530 (2006) (This court has consistently explained that a timely notice of appeal divests the district court of jurisdiction to act and vests jurisdiction in this court) (citations omitted)}. Burrow has NEVER filed any hunney-cut motion and the district court and the piece of shit fat fuck Dawn Thorne has exceeded her subject matter jurisdiction and all her orders on this appeal are VOID, not voidable. This court reviews legal questions de novo. Williams v. Eighth Judicial Dist. Court, 127 Nev. 518, 525, 127 Nev. 518, 262 P.3d 360, 365 (2011).

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## **SECOND ARGUMENT:**

If the district court is not inclined to grant the requested relief in a honeycut motion, however, then as stated by Nevada Supreme Court, the district court may enter an order denying the motion. See, King, 287 F.3d at 94; Federal Land Bank, 889 F.2d at 766. Nevada Supreme Court has stated that if the order denying such relief is independently appealable, such as an order denying NRCP 60(b) relief, denying an NRCP 59 new trial motion, or refusing to modify or vacate a child custody arrangement under NRS 125.510(1)(b), any party aggrieved by that order may appeal that order to this court. See, Holiday Inn v. Barnett, 103 Nev. 60, 732P.2d 1376 (1987) (order denying NRCP 60(b) relief is appealable); NRAP 3A(b)(2) (order denying a motion for a new trial is appealable); Burton v. Burton, 99 Nev. 698, 669 P.2d 703 (1983) (order denying a motion to modify a family court order, when the motion is based on changed factual or legal circumstances, is appealable as a special order after final judgment). The district Court has DENIED Shahrokhi's motion to set aside Rule 60 based on fraud upon the Court by Thomas Standish, Esq. and Kizzy Burrow and Shahrokhi and his minor son have been aggrieved by such stupid and ridiculous denial by the fat fuck Dawn Throne.

## **THIRD ARGUMENT:**

NRS 18.020(4) is clear. Costs are be allowed in a special proceeding.



Shahrokhi had even included a copy of the court of appeal decision in case # 65289, *Falconi v The Secretary State of Nevada*, however this fat fuck piece of shit Dawn Thorne, the biased piece of shit, she thinks she is above the law and laws do not apply to her fat brainless head. The precedent speaks clearly for itself, yet this dumb, fat ugly criminal wrongly named as a judge willfully denies Shahrokhi's request for cost in a special proceeding that Shahrokhi is entitled to. Shahrokhi will not waste more of his precious time arguing this matter as the precedent decision in Nevada Court of appeals case # 65289 is very clearly however this fat fuck Thorne seems to be the only piece of shit that doesn't get it. Thorne's head must be chasing after food, not legal arguments and that's why this fat low life is over 500 pounds. I hope she chokes on her stinking Cheetos, and she has a heart attack or stroke right on the bench one of these days. Thorne, the fat fuck belongs to HELL. The less criminals we have like the Thornes and Harters presiding over the honorable bench, the better people of Nevada will do getting their fair share of real justice.

#### **FOURTH ARGUMENT:**

A district court's grant or denial of an anti-SLAPP motion to dismiss is reviewed de novo. A special motion to dismiss under Nevada's anti-SLAPP statute should be granted where the defendant shows by a preponderance of the evidence that the claim is based upon a good-faith communication in furtherance of the right

to petition or the right to free speech regarding a matter of public concern, Nev. Rev. Stat. § 41.600(3)(a), and the plaintiff cannot show with prima facie evidence a probability of prevailing on the claim, Nev. Rev. Stat. § 41.660(3)(b). A good-faith communication in furtherance of the right to free speech regarding a matter of public concern includes any communication that is (1) made in direct connection with an issue of public interest, (2) in a place open to the public or in a public forum, and (3) which is truthful or is made without knowledge of its falsehood. Nev. Rev. Stat. § 41.637(4) Court never made any fact findings on this, no hearing was ever held and never did fact finding that the issue was of a public interest. Throne stating NRS 41.660 only applies to new action or new complaint is an abuse of discretion and trying to violate Shahrokhi's first amendment right to petition the court.

#### **FIFTH ARGUMENT:**

Whether a judge's impartiality can reasonably be questioned under an objective standard is a question of law that is reviewed de novo. PETA v. Bobby Berosini, Ltd., 111 Nev. 431, 437- 38, 894 P.2d 337, 341 (1995). The appellate court will "exercise its independent judgment of the undisputed facts." Id. Thorne has committed perjury under penalty of perjury. She has lied in her affidavit signed under penalty of perjury, part of the record on 9/10/2021 that she has NEVER

signed any written orders yet she completely committed perjury. Shahrokhi wants to make known to all, Shahrokhi will not tolerate corruption and criminal judges such as FAT FUCK THRONE who is the real criminal and Shahrokhi is entitled to a fair trial and a fair judge under 14<sup>th</sup> amendment of the U.S. Constitution as part of his due process rights, The fact that this fat fuck piece of shit Thorne has committed perjury and lied by clear and convincing evidence as part of the record and still refuses to recuse, she is violating Shahrokhi's fundamental rights to a fair and honest judge and fair and honest trial guaranteed by the 14<sup>th</sup> amendment of the US constitution. See Shahrokhi's petition to the Supreme court under case # 84043, Thorne Perjury. Thorne, the fat fuck MUST BE DISQUALIFIED and removed from Shahrokhi's case immediately.

### **CONCLUSION**

It is obvious Thorne is divested out of jurisdiction. She has no regard for subject-matter jurisdiction. Her behavior is troubling. As such behavior is not tolerated by U.S. Constitution and it is a high risk of bias. (See Rippo v Baker (2017)). Orders that are entered by the district court after having been divested of jurisdiction are VOID not voidable. (see, Smith v Emery 109 Nev. 737, 741, 856 P2d. 1386, 1388-1389(1993) [A]ll orders issued by the district court after Emery filed his notice of appeal are VOID).




Thorne is a PIECE OF SHIT, A FAT FUCK SCUM BAG. Shahrokhi's expression of speech using profanity toward Thorne who is a criminal committing perjury and thinking she is above the law is absolutely 100% protect by the First Amendment. Thorne is a fat fuck, scum bag. Thorne is a piece of shit and not judge material. Judges don't lie under perjury, Thorne is GRABAGE. She should be removed from the bench immediately, She is a danger to the public and shame on anyone one that protects this fat fuck smelly piece of shit. Just look at her fucking size. Shame on all you justices of the supreme court that allow a district court judge committing perjury and then refuse to recuse and use the bench to retaliate. That is not justice that is corruption and mis-justice.

Shahrokhi asks this honorable court for the sake of maintaining the integrity of the justice to do the following:

- 1) An ORDER immediately granting all of Shahrokhi's relief requests in the opening brief;
- 2) An ORDER immediately disqualifying fat fuck Thorne for committing perjury in the record, lying under penalty of perjury;
- 3) An ORDER for all cost, expenses and fees associated by this appeal to Shahrokhi and collected from Dawn Throne, Kizzy Burrow or combination of both of them;

4) Any other remedy and relief this court sees fit.

DATED this 8th Day of February 2022,



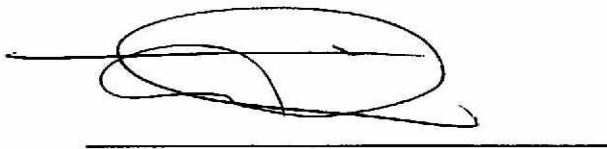
Ali Shahrokhi,

In Proper Person.

**CERTIFICATE of COMPLIANCE**

Pursuant to NRAP 3C(h)(2), this reply complies with the typeface and type style requirements of Rule 32, Times New Roman, 14-point, and this reply complies with the word limits. The reply contains 1,424 words (under the 2,333 legal word limit).

Dated: February 8th, 2022



ALI SHAHROKHI

Self-Represented Petitioner



**AFFIDAVIT of ALI SHAHROKHI**

My name is ALI SHAHROKHI. I am an Appellant herein. All facts herein alleged are true and correct of my own personal knowledge; and as to those matters alleged on information and belief, I reasonably believe them true. If called upon to testify, I could and would give competent and truthful evidence.

I declare under penalty of perjury, pursuant to the laws of the State of Nevada, the foregoing is both true and correct.

Dated: February 8th, 2022

ALI SHAHROKHI

IN PROPER PERSON

**CERTIFICATE OF SERVICE**

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

addressed as follows:

Eighth Judicial District Court

Kizzy Burrow

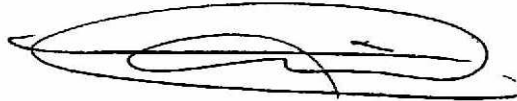
Dawn "FAT FUCK" Thorne, Dept. "U"

16408 SW Timberland Dr.

200 Lewis Ave.

Beaverton, Oregon 97007

Las Vegas, NV 89101

A handwritten signature in black ink, appearing to read 'Ali Shahrokhi', enclosed within a hand-drawn oval border.

**ALI SHAHROKHI**

**IN PROPER PERSON**