

NOV 29 2021

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERKIN THE SUPREME COURT OF THE STATE OF NEVADA

LUIS ANGEL CASTRO,

Appellant,

vs

No. 83680

THE STATE OF NEVADA,

Respondent,

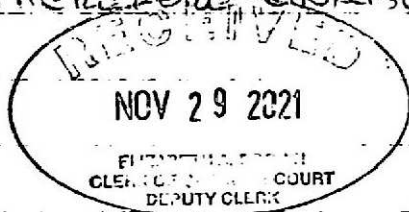
MOTION FOR APPOINTMENT OF COUNSEL AND
REQUEST FOR EVIDENTIARY HEARING

COMES NOW, APPELLANT, LUIS A. CASTRO, IN PRO SE,
DILIGENTLY AND RESPECTFULLY ASK THIS HONORABLE -
COURT TO APPOINT COUNSEL, TO REPRESENT HIM ON APPEAL
AND AT AN EVIDENTIARY HEARING, BASED ON THE FOLLOW-
ING REASONS:

1. THIS MOTION AND ALL PREVIOUS LEGAL INSTRUMENTS -
DOCUMENTS HAVE BEEN PREPARED BY TRANSIENT -
PRISONERS ON BEHALF OF THE APPELLANT.

2. THE CLAIMS/ISSUES INVOLVED IN THIS CASE
ARE COMPLEX, AND THE APPELLANT LACKS THE -
MENTAL FACULTY NECESSARY TO COMPREHEND
THE PROCEEDINGS.

3. THE APPELLANT IS AN INDIGENT PRISONER,
THEREFORE UNABLE TO AFFORD COUNSEL.



1 4. THE APPELLANT IS AND WILL BE CONTINUE TO BE
2 HOUSED IN ADMINISTRATIVE SEGREGATION, THE REFORM
3 IS EXTREMELY LIMITED ACCESS TO THE LAW LIBRARY AND
4 TO INDIVIDUALS WITH THE WILLINGNESS TO HELP HIM IN
5 THE PREPARATION OF AN APPELLANT'S BRIEF - THE PRE-
6 SENTING HIS CLAIMS IN POST CONVICTION APPEAL.

7 5. THIS WRITING WROTE LETTERS TO SEVERAL ATTORNEYS
8 ASKING THEM TO REPRESENT APPELLANT PRO BONO CON-
9 SIDERING HIS 'LOW INTELLECTUAL FUNCTION' AS THE
10 RECORD SUBSTANTIATES.

11 6. THIS CASE REQUIRES AN EVIDENTIARY HEARING.
12 DEFENSE COUNSEL'S MISLEADING ASSERTIONS TO THE
13 APPELLANT'S PARENTS, WERE MADE OUTSIDE THE
14 RECORD, HENCE THE DISCUSSIONS BETWEEN THEM
15 WERE ONLY WITNESSED BY EACH OTHER - THEREFORE,
16 THE APPELLANT SHOULD BE ENTITLED TO EXPAND THE
17 RECORD, TO INCLUDE DEFENSE COUNSEL - FALSE
18 STATEMENT TO APPELLANT'S PARENT, WHICH WAS
19 THE CATALYST IN THE APPELLANT'S A SET BACK OF
20 THE RIDICULOUS & POOR NEGOTIATION.

21 7. WITHOUT AN EVIDENTIARY HEARING THE
22 APPOINTED COUNSEL OR THE PRISONER(S) HELPING
23 THE APPELLANT WILL NOT BE ABLE TO ADEQUATELY
24 PRESENT THE CLAIMS ON APPEAL. ESPECIALLY,
25 SINCE AN INVESTIGATION WILL BE REQUIRED.

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1 THE APPOINTMENT OF COUNSEL IS THE STATE'S
2 CHOSEN METHOD OF PROVIDING THE APPELLANT MEANING-
3 FULL ACCESS TO THE COURT, FAILURE TO APPOINT
4 COUNSEL WILL GREATLY HINDER APPELLANT'S EFFORTS
5 TO PURSUE ARGUABLE LEGAL CLAIMS, WHICH HE
6 HAS DILIGENTLY ATTEMPTED TO FAIRLY PRESENT
7 TO THE COURT(S).

8 APPELLANT PRAYS THAT THE JUSTICE(S) CONSIDER
9 THE COMPLEXITIES OF THIS CASE, AND AGREE, THAT
10 TO DENY HIM AN ATTORNEY, WILL ALSO DENY HIM
11 DUE PROCESS.

12 BASED ON THE ABOVE REASONS, THE APPELLANT
13 REQUEST APPOINTMENT OF COUNSEL AND AN
14 EVIDENTIARY HEARING.

15
16 PURSUANT TO NRS 208.165, I DECLARE
17 UNDER THE PENALTY OF PERJURY THAT THE
18 AFOREREMENTIONED IS TRUE AND CORRECT.

19
20 Respectfully Submitted

21
22 
23 LUIS M. CASTRO, 1214547
24 APPELLANT IN PRO SE
25 ELY STATE PRISON
26 P. O. BOX 1989
27 ELY, NV. 89301
28

CERTIFICATE OF SERVICE

I, Luis A. Castro, HEREBY CERTIFY THAT I
AM THE Appellant IN THIS MATTER, AND I AM
REPRESENTING MYSELF IN PROPRIO PERSONA,

ON THIS 21ST DAY OF NOVEMBER 2, 2021, I SERVED
COPIES OF THE MOTION FOR APPOINTMENT OF
COUNSEL, REQUEST FOR AN EVIDENTIARY
HEARING, AND MOTION FOR ANCILLARY SERVICES
TO INCLUDE FEES TO HIRE AN INVESTIGATOR,
IN NEVADA SUPREME COURT CASE NO. 83680, AND
PLACED SAID MOTIONS IN U.S. FIRST CLASS MAIL,
POSTAGE PREPAID, ADDRESS - SENT TO:

NEVADA ATTORNEY GENERAL	CLARK Co. DIST. ATTORNEY
100 NORTH CROWN STREET	200 LEWIS AVE., 3 RD FL
CARSON CITY, NV. 89701-4717	LAS VEGAS NV. 89155-2212

SUPREME COURT OF NEVADA

OFFICE OF THE CLERK
Suite
201 S. Crown St., 201
CARSON CITY, 89701-4702


Luis A. Castro, 1214-47