

IN THE SUPREME COURT OF NEVADA  
STATE OF NEVADA

JESUS NAJERA,

Petitioner,

vs.

THE EIGHTH JUDICIAL  
DISTRICT COURT; THE  
HONORABLE CRYSTAL  
ELLER,

Respondents,

STATE OF NEVADA,

Real Party in Interest.

Electronically Filed  
Apr 07 2022 02:41 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

S. Ct. No.: 83923

DIST. CT. NO. C-21-356361-1

**PETITIONER NAJERA'S REQUEST FOR LEAVE TO FILE A REPLY  
TO THE STATE'S ANSWER FILED MARCH 29, 2022.**

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CRYSTAL ELLER  
DISTRICT COURT JUDGE  
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**PET**

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Attorneys for Petitioner

**IN THE SUPREME COURT OF NEVADA**

**STATE OF NEVADA**

JESUS NAJERA,

Petitioner,

vs.

THE HONORABLE CRYSTAL

ELLER, EIGHTH JUDICIAL

DISTRICT COURT JUDGE,

DEPT. NO. 19,

Respondent,

STATE OF NEVADA,

Real Party in Interest.

S. Ct. No.: 83923

DIST. CT. NO. C-21-356361-1

**PETITIONER NAJERA'S REQUEST FOR LEAVE TO FILE A REPLY  
TO THE STATE'S ANSWER FILED MARCH 29, 2022.**

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**PETITIONER NAJERA'S REQUEST FOR LEAVE TO FILE A  
REPLY TO THE STATE'S ANSWER FILED MARCH 29, 2022.**

COMES NOW Petitioner/Appellant JESUS NAJERA, through his counsel  
MICHAEL D. PARIENTE, ESQUIRE. and JOHN G. WATKINS, ESQUIRE,  
OF COUNSEL and requests leave to file a Reply to the State's Answer filed  
March 29, 2022 because Najera believes that this Court will benefit from  
Najera's Reply because the State misrepresents NRAP 40B(a), falsely claims  
Najera has failed to comply with NRAP 40B, and submits numerous arguments  
which amount to nothing more than "red herrings".

DATED this 6<sup>th</sup> day of April, 2021.



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**VERIFICATION**

Under penalty of perjury, the undersigned declares that in the foregoing Motion and knows the contents thereof; that the Motion is true of the undersigned's own knowledge, except as to those matters stated on information and belief, and as to such matters the undersigned believes them to be true.

Respectfully submitted,



Michael D. Pariente, Esquire  
Attorney for Petitioner Martin  
John Glenn Watkins, Esquire

## **CERTIFICATE OF COMPLIANCE**

1. I hereby certify that this brief complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because:

☐ This brief has been prepared in a proportionally spaced typeface using Microsoft Word 2016 with Times Roman 14 font style

2. I further certify that this brief complies with the page – or type - volume limitations of NRAP 32(a)(7) because, excluding the parts of the brief exempted by NRAP 32(a)(7)(C), it is either:

☐ Proportionally spaced, has a typeface of 14 points or more, and contains 802 words; or

☐ Monospaced, has 10.5 or fewer characters per inch, and contains ----- words or ----- lines of text, or

☐ Does not exceed 51 pages.

3. Finally, I hereby certify that I have read this Motion, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose. I further certify that this brief complies with all applicable Nevada Rules of Appellate Procedure, in particular NRAP

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2 28(e)(1), which requires every assertion in the brief regarding  
3 matters in the record to be supported by a reference to the page  
4 and volume number, if any, of the transcript or appendix where  
5 the matter relied on it to be found. I understand that I may be  
6 subject to sanctions in the event that the accompanying brief  
7 is not in conformity with the requirements of the Nevada Rule  
8 of Appellate Procedure.  
9  
10

11 Dated this 6<sup>th</sup> day of April, 2022.  
12



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14 Michael D. Pariente, Esquire  
15 Attorney for Petitioner Martin  
16 John Glenn Watkins, Esquire  
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**CERTIFICATE OF SERVICE**

I, Christopher Barden, hereby certify and affirm that this document was filed electronically with the Supreme Court on April 6, 2022. Electronic Service of the foregoing Motion shall be made in accordance with the Master Service List as follows:

STEVEN WOLFSON,  
DISTRICT ATTORNEY



---

Christopher Barden,  
an employee of  
Michael D. Pariente,