

FILED

FEB 17 2022

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

David L. Reed #1696429
C.C.A.C.
330 S. Casino Center Blvd.
Las Vegas, NV 89101
petitioner pro per

IN THE SUPREME COURT OF NEVADA

David L. Reed,
petitioner,

Case No.

District Court No. C-18-329762-1

V.S.

THE STATE OF NEVADA, THE
EIGHTH JUDICIAL DISTRICT
COURT in and for the County
of Clark and the Clark
County District Attorney Office

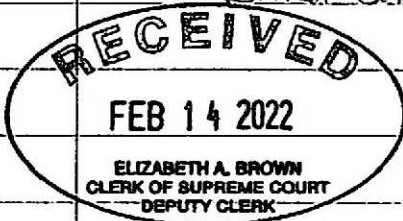
Respondent(s).

MOTION FOR LEAVE TO EXCEED 7,000 WORD
LIMIT

COMES NOW, Petitioner, David Reed, in Pro Per, and
Respectfully move this Court for leave to exceed 7,000 word
limit in his WRIT OF PROHIBITION

This Motion is made pursuant to Rule 21(d) of the
NRA, Good Cause.

Dated: January 25, 2022.



BY: *David Reed*
David Reed #1696429
Petitioner / Pro per

STATEMENT OF FACTS

Petitioner is not sure if this petition has went
over 7,000 words, but kept the petition as brief
as possible.

Legal Argument

Pro se Pleadings should be held to a less stringent standard than pleadings drafted by a trained attorney. Rayes v. Johnson, 969 F.2d 700, 703-04 (8th Cir. 1992) Counsel's failure to pursue his client's interests zealously, re Kramer, 61 Nev. 174, 122 P.2d 862 (1942), and Counsel's failure to prepare and investigate his client's case carefully, Jackson v. Warden, 91 Nev. 430, 537 P.2d 473 (1973) results in the deprivation of an accused's Sixth Amendment right to effective assistance of counsel.

Conclusion

For the reasons stated above, petitioner prays for the Court to allow him to exceed 7,000 words.

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Donna Keel
Petitioner / Pro se

CERTIFICATE OF SERVICE

I hereby certify that I am the petitioner pro se and that on this 24th day of April 2022, I gave the foregoing motion to a C/O to mail via first class mail U.S. Postage Free paid to:

Clerk of Court
Supreme Court of Nevada
201 S. Carson Street #201
Carson City, Nevada 89701

1 ROUTING STATEMENT

2 This writ of Prohibition is Presumptively retained by the
3 Supreme Court because it is AN extraordinary Pretrial writ and
4 the Petitioner has no other equitable Pretrial Remedy.
5 See NRS 177.015, 34.320

6 Jurisdictional Statement

7 This is A Pretrial writ of Prohibition. This Court
8 has jurisdiction Pursuant to NRS 177.015

9 NRAP 26.1 Disclosure

10 The undersigned Petitioner is proceeding in Pro Per and
11 certify that the following are persons and entities as
12 described in NRAP 26.1 (a) and must be disclosed pursuant
13 to that rule. These representations are made so that the
14 justices of this court may evaluate any potential conflicts
15 warranting disqualification or recusal.

16 1. Petitioner is pro per and have no Att. of record.

17 a. David L. Reed #1696429

18 2. Publicly held companies associated:

19 a. N/A

20 3. Law firm(s) appearing in the courts below:

21 (a) Clark County District Attorneys

(b) Marcus Kent Kozal

22 Dated this January 25, 2022

23 David L. Reed

24 David L. Reed #1696429

25 C.C.D.C.

26 330 S. Casino Center Blvd.
27 LV, NV 89101

1 STATEMENT OF ISSUES PRESENTED
2 FOR REVIEW

3
4 ABUSE OF DISCRETION

5 DUE PROCESS

6 EQUAL PROTECTION

7 WORK PRODUCT PRIVILEGE VIOLATION

8 NO plain, speedy Adequate Remedy

9 CERTIFICATE OF COMPLIANCE

10 1. I hereby certify that this Petition does not comply
11 with the formatting requirements of NRAP 32 (a)(4), does not comply
12 with the typeface requirements of NRAP 32(a)(5) and does not
13 comply with the type style requirements of NRAP 32(a)(6) because
14 I am Pro Per and don't have Microsoft.

15 2. I further certify that this Petition does not comply with
16 the page and type-volume limitations of NRAP 32(a)(7). see
17 motion to exceed 7,000 word limit.

18 3. Finally, I hereby certify that I have read this writ
19 OF PROHIBITION, and to the best of my knowledge, information, and
20 belief, it is not frivolous or interposed for any improper purpose, I
21 Finally certify that to the best of my ability that this Petition Comports
22 with NRAP 32 (a)(4) and 28(c)(1).

23 DATED: January 25, 2022

24 BY: Daniel J. Reed

25 PETITIONER PRO PER.