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4                   IN THE SUPREME COURT OF NEVADA  
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7                   JASON Bolden  
8                   (APPellant)  
9  
10                  VS.  
11  
12                  NEVADA DEPT. OF CORRECTION  
13                  (Respondent)

14                  Supreme Court No. 84293

15                  District Court No. A-21-842D92-W  
16                  L-18-334635

17                  FILED

18                  JUN 06 2022

19                  ELIZABETH A. BROWN  
20                  CLERK OF SUPREME COURT  
21                  BY: *[Signature]*  
22                  DEPUTY CLERK

23                  MOTION TO STAY PURSUANT N.R.A.P.

24                  RULE NO.8

25                  Comes now, appellant JASON BOLDEN above mentioned  
26                  and move this Honorable Court to grant the above titled  
27                  motion to stay appellant's informal brief filed on the above  
28                  case no. 84293 on April 27, 2022.

29                  this motion is based in all the documents, filings, and  
30                  memorandum of Points and Authorities stated herein.

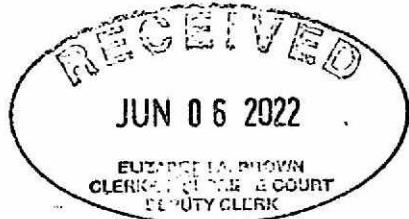
31                  dated: This 30th day of May, 2022

32                  Respectfully Submitted

33                  for BLL #1032099  
34                  Appellant acting Pro Se.

35                  JASON BOLDEN ID.NO. 1032099

36                  SDCC P.O Box 208  
37                  Indian Spring, NV 89070



MEMORANDUM OF POINTS AND AUTHORITIES

1     STATEMENT OF THE CASE

2     Appellant, Jason Bolden stated here in, filed a Petition for Writ of habeas Cor-  
3     pus at the eighth judicial district Court See R.D.A Vol 1 Pg 1-9; 61-67, Subsequently,  
4     a motion to Voluntary Dismiss the Petition for Writ of habeas Corpus (Post-Conviction)  
5     See Vol 3 11/20/2021 Pg 685-690. This Pleadings Were rejected by the Clerk of the  
6     Court. Pursuant District Court Rules 3:70,

7     There after, a Judicial notice to resolve matters that have come before the Court  
8     as to "Post- Conviction" Proceedings on habeas Corpus (Post-Conviction), Motion to withdraw  
9     Counsel of record and other issues. See R.D.A Vol 3 1/31/2022 Pg 708-726 Vol 4 1/31/2022  
10 Pg 727-732. Also rejected by the Clerk of the Court.

11     The District Court on January 27, 2022, issued an Order denying Appellant's Writ of ha-  
12     beas Corpus (Post-Conviction). Appointment of Counsel and request for evidentiary hearing.  
13     Accordingly, Appellant filed a timely notice of appeal, and this Case is Pending  
14     a decision by this Court.

15     LEGAL Argument.

16     THE NEVADA RULE OF APPELLATE PROCEDURE (NRAP) Rule 8, allow a motion to stay  
17     Pending Appeal or resolution of original Writ Proceedings, (1) initial motion in the  
18     district Court A)- a Party must Ordinarily move first in the district Court for the  
19     following Relief: b) a stay of the Judgment or Order of, or Proceedings in,  
20     a district Court Pending appeal or resolution of a Petition to the Supreme Court or  
21     Court of Appeals for an extraordinary Writ  
22     c- An Order Suspending, modifying, restoring or granting an injunction while an  
23     Appeal or Original, writ Petition is Pending.

24     Appellant's informal brief in Support of a Writ of habeas Corpus (Post-Conviction),  
25     is currently pending a decision by this Court, hence, is appellant's wishes for  
26     this Court to stay this Proceedings and remand appellant's Writ of habeas  
27     Corpus (Post Conviction) with an Order appointing Counsel for representation. Counsel  
28     Would amend and litigate the matter stated thereto, where evidentiary hearing

is required in Appellant's Case, which allege important issues of ineffective assistance of Trial Counsel, (Benjamin J. Nadig), whom failed to respond an important Appeal filed by the Prosecution in the district Court following, Appellant's dismissal of his Criminal Case by a Magistrate during Pre-trial hearing. See, Bolden v. State, Case No. 79715, and/or district Court No. C-18-334635. Trial Counsel's actions were ineffective and highly prejudicial to Appellant's liberty interest, the district Court granted the Prosecution's unopposed Appeal and proceeded to Trial whereas appellant was convicted in all charges and sentenced to serve harsh sentences.

This Court can also note from the record that Appellant is an unlearned litigant, Appellant's issues are complex and of Constitutional magnitude, his inexperience cause him to incorrectly file documentation while his direct Appeal is pending a decision by the Nevada Supreme Court en banc Panel, (See Petition For Rehearing) at Case No. 79715. This motion is not made with the purpose of unnecessary delay but that justice is fairly served.

Conclusion, for the above stated reasons is Appellant's wishes for this honorable Court to grant this motion to stay, and remand with an order for the district court appoint counsel and grant evidentiary hearing.

Respectfully Submitted

Dated: this 30th day of May, 2022

*JMB/L* #1032099  
Appellant Pro Se

#### CERTIFICATE OF SERVICE BY MAILING

I, Jason Belden, hereby certify pursuant to NRCP 5(c)(1) that on this 30th day of May, 2022, I mailed a true and correct copy of the foregoing MOTION TO STAY Pursuant N.R.A.P Rule No. 5 by placing document in a sealed Pre-Postage Paid envelope and deposited said envelope in the United States Mail addressed to the,

Clerk of the Supreme Court of Nevada.

201 South Carson St. # 201

Carson City, NV 89701

Dated: this 30th day of May, 2022

*JMB/L* #1032099  
Appellant in Propria Personam