

FILED

JUL 29 2022

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

IN THE SUPREME COURT OF THE STATE OF NEVADA

WILLIAM MANTLE,
Appellant/Cross-Respondent,

No. 84821

vs.

JENNIFER BREKHUS, AKA JENNY
BREKHUS

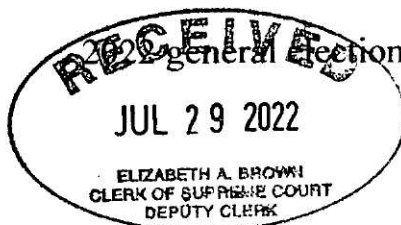
Respondent/Cross-Appellant,

THE CITY OF RENO,
Cross-Respondent.

RESPONSE TO MOTION TO DIMISS APPEAL AS MOOT

COMES NOW, Appellant/Cross-Respondent WILLIAM MANTLE
“Appellant”, and hereby files a RESPONSE TO MOTION TO DIMISS filed by
Respondent/Cross-Appellant “Respondent” JENNY BREKHUS’ counsel Luke A.
Busby & John L. Marshall on July 25, 2022.

The Appellant says as follows; the issue before this Honorable Court is not
whether the Respondent Jenny Brekhus is ‘currently’ on the ballot for the Nevada
general election for Reno City Mayor, it is whether the Second Judicial



22-23929

District Court erred in its decision which allowed Respondent to participate in an election that Respondent was legally barred from participating in. This Appellant seeks to exercise their sacred right to due process granted by the Nevada and United States constitutions to appeal by and through the Nevada Rules of Appellate Procedure. This Appellant has properly entreated this Honorable Court to seek remedy through this appeal to ask for the review and possible correction of the court record; it should not be considered and/or dismissed as moot, and further, that the court must take into consideration this Appellant's constitutional right to due process. Anything less than the continuation of this case would deny this Appellant's right to due process.

There can be no doubt that if Respondent unsuitably participated in an election as a result of an improper ruling by the Second Judicial District Court other qualified candidates, including this Appellant, were irrevocably damaged due to the vast amounts of time and money that were exhausted to participate in such an election that was influenced by an unqualified elector. Those candidates may be able to seek additional methods of relief if this court reverses the lower court's decision.

Furthermore, per the Respondent's cross-appeal docketing statement filed 30 June, 2022 4 issues are sought for relief. The act of filing this cross-appeal keeps these issues live. While the Respondent is willing to dismiss the issues of

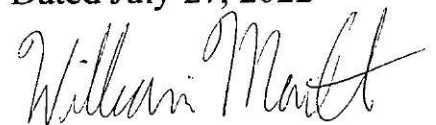
timeliness and attorney's fees if this motion were granted—and tacitly the issue of mootness due to Respondents ranking in the 2022 primary election may be addressed —Respondent did not address the other issue that would remain live. That issue being, “Whether the District Court erred in finding that Brekhus’ candidacy [for] Reno mayor was not prohibited by term limits imposed by the Nevada Constitution”. As the Respondent has not withdrawn their cross-appeal at the time of the writing of this response it is the Appellant’s position that granting Respondent’s motion to dismiss would harm the Respondent by denying their opportunity to seek the relief sought in their cross-appeal.

Lastly, this Appellant has expended considerable time and resources to access the constitutional right to due process guaranteed to citizens of these United States to seek a review of a constitutional question that only this Court can satisfy.

WHEREFORE, Appellant respectfully requests that this Honorable Court deny Respondent’s motion to dismiss, or in the alternative as this Honorable Court sees fair and just.

Pursuant to NRS 239B.030, this document does not contain personal information of any person.

Dated July 27, 2022

A handwritten signature in black ink, appearing to read "William Mantle", written in a cursive style.

William Mantle

CERTIFICATE OF SERVICE

Pursuant to NRCP 25(c), I certify that on the date indicated below, I caused service to be completed by:

☐ personally delivering;
☐ delivery via Reno/Carson Messenger Service;
☐ sending via Federal Express (or other overnight delivery service);
☒ depositing for mailing in the U.S. mail, with sufficient postage affixed thereto; or,
☐ delivery via electronic means (fax, eflex, NEF, etc.)
a true and correct copy of the foregoing pleading addressed to:

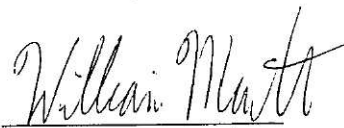
LUKE A. BUSBY ESQ. 316 California Ave., #82, Reno, NV 89509

KARL HALL, ESQ. for CITY OF RENO PO Box 1900, Reno, NV 89505

JOHN L. MARSHALL ESQ. 570 Marsh Ave., Reno, NV 89509

SUPREME COURT OF NEVADA, Office of the Clerk, 201 S. Carson St., STE 201, Carson City, NV 89701

Dated: July 27, 2022

By: 
William Mantle

1 Name: William Mantle
2 Address: 2040 Angel Ridge Dr.
3 Reno, NV 89521
4 Telephone: 775-842-9394
Email: mantleformayor@gmail.com
Self-Represented Litigant

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

6 WILLIAM MANTLE,)
Appellant,)
7 vs.) Case No. 84821
JENNIFER BREKHUS, A/K/A JENNY) District Court Case No CV22-00560
8 BREKHUS,)
9 Respondent.)

10 PROOF OF SERVICE

11 I served a true and correct copy of Response to Motion to
12 Dismiss Appeal as Moot upon the following people:

13 1. Name: LUKE A. BUSBY ESQ. Date: 07/27/2022

14 By: Certified mail, return receipt

15 Address where service occurred, if applicable:

16 316 CALIFORNIA AVE., #82, Reno, NV 89509

17 A copy of this Proof of Service has been electronically
18 served, mailed, or personally delivered to all parties or their
19 lawyer.

20 This document does not contain the personal information of any
21 person as defined by NRS 603a.040.

22 Date: 07/27/2022

Your Signature: William Mantle

23 Print Your Name: William Mantle
24
25
26

1 Name: William Mantle
2 Address: 2040 Angel Ridge Dr.
3 Reno, NV 89521
4 Telephone: 775-842-9394
5 Email: mantleformayor@gmail.com
6 Self-Represented Litigant

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8 WILLIAM MANTLE,)
9 Appellant,)
10 vs.)
11) Case No. 84821
12 JENNIFER BREKHUS, A/K/A JENNY) District Court Case No CV22-00560
13 BREKHUS,)
14 Respondent.)

15 PROOF OF SERVICE

16 I served a true and correct copy of Response to Motion to
17 Dismiss Appeal as Moot upon the following people:

18 1. Name: KARL HALL, ESQ. for CITY OF RENO Date: 07/27/2022

19 By: Certified mail, return receipt

20 Address where service occurred, if applicable:

21 P.O. BOX 1900, RENO, NV 89505

22 A copy of this Proof of Service has been electronically
23 served, mailed, or personally delivered to all parties or their
24 lawyer.

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26 person as defined by NRS 603a.040.

27 Date: 07/27/2022

28 Your Signature: William Mantle

29 Print Your Name: William Mantle

1 Name: William Mantle
2 Address: 2040 Angel Ridge Dr.
3 Reno, NV 89521
4 Telephone: 775-842-9394
5 Email: mantleformayor@gmail.com
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10 vs.)
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12 BREKHUS,) District Court Case No CV22-00560
13 Respondent.)

14 PROOF OF SERVICE

15 I served a true and correct copy of Response to Motion to
16 Dismiss Appeal as Moot upon the following people:

17 1. Name: JOHN L. MARSHALL ESQ. Date: 07/27/2022

18 By: Certified mail, return receipt

19 Address where service occurred, if applicable:

20 570 MARSH AVE., RENO, NV 89509

21 A copy of this Proof of Service has been electronically
22 served, mailed, or personally delivered to all parties or their
23 lawyer.

24 This document does not contain the personal information of any
25 person as defined by NRS 603a.040.

26 Date: 07/27/2022

Your Signature: William Mantle

Print Your Name: William Mantle