

FILED

SEP 28 2022

ETHEL A. BROWN
CLERK OF SUPREME COURT
BY: [Signature]
DEPUTY CLERK

1 Keith Sullivan ID NO. 92630

2 SOUTHERN DESERT CORRECTIONAL CTN.
3 20825 COLD CREEK RD.
4 P.O. BOX 208
5 INDIAN SPRINGS, NV 89010

6 IN THE NEVADA SUPREME
7 COURT, STATE OF NEVADA

8 Keith Sullivan
9 Appellant/Movant

10 v.

11 Perry Russell, warden, et al
12 Respondents

CASE NO.: [Crossed out]

DEPT. NO.: [Crossed out]

DOCKET: 85109

13 Motion to Correct a Harmful Error
14
15
16

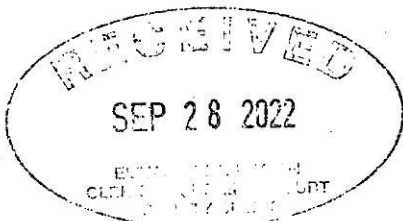
17 COMES NOW, Keith Sullivan In Proper Person, herein above respectfully
18 moves this Honorable Court for an Motion to Correct his Harmful
19 Error in his appeal.
20

21 This Motion is made and based upon the accompanying Memorandum of Points and
22 Authorities,

23 DATED: this 22 day of September, 2022

24 BY: [Signature]

25 Keith Sullivan # 92630
26 Defendant In Proper Personam



22-30535

1 This motion follows the Nevada Supreme Court's order denying
2 my various motions named in its order. This Court's Sept. 19, 2022
3 order dismisses those motions because it appears that I have
4 mistakenly assigned them to my Petition for Writ of Habeas Corpus,
5 docket no: 85075. I had meant to have them pertain to my appeal
6 of the petition's dismissal, docket no: 85109.

7 I hereby request this Honorable Court to re-file all of those
8 motions as well as one I recently mailed that was not stated in the
9 order, a "Third and Final Motion to Include Documents in Support of
10 Appellant's Motion to Apply Equitable Tolling to Amended Petition for
11 Writ of Habeas Corpus," in docket no: 85109. This will prevent my
12 having to replicate those documents which would be unduly
13 burdensome to me in terms of both time and money.

14 The NDOC's Law Library at Southern Desert Corr. Ctr. only
15 allows two, two-hour periods per week and does not provide type-
16 writers to inmates. Since I am perilously close to the NDOC's \$100
17 copywork limit, as stated in the "motion to Extend Prison Copywork
18 Limit," I would not be able to make the necessary copies to
19 present those motions to the Court and Respondents. Since both
20 parties already have those motions, the easiest way to resolve
21 my apparent error would be to grant this motion.

22 CONCLUSION

23 Additionally, there are original documents within those motions
24 that I cannot reproduce. For the above stated reasons I now
25 move this Court to grant this motion to Correct Harmful Error and
26 re-file all motions stated herein to docket no: 85109.

CERTIFICATE OF SERVICE BY MAILING

I, Keith Sullivan, hereby certify, pursuant to NRCP 5(b), that on this 22nd
day of September 2022, I mailed a true and correct copy of the foregoing, "Motion to
Correct a Harmful Error"
by placing document in a sealed pre-postage paid envelope and deposited said envelope in the
United State Mail addressed to the following:

Nevada Supreme Court
201 S. Carson St., Suite 201
Carson City, NV 89701

Nevada Atty Gen Office
100 N. Carson St
Carson City, NV 89701

Washoe Co. Dist. Atty
One S. Sierra St
Reno, NV 89501

CC:FILE

DATED: this 22 day of September, 2022.

Keith Sullivan

92630

/In Propria Personam
Post Office Box 208, S.D.C.C.
Indian Springs, Nevada 89018
IN FORMA PAUPERIS: