

Name Keith Sullivan

NDOC # 92630

Southern Desert Correctional Center  
Post Office Box 208  
Indian Springs, Nevada 89070-208

FILED

OCT 03 2022

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY S. Young  
DEPUTY CLERK

FILED

SEP 01 2022

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

IN THE SUPREME COURT OF THE  
STATE OF NEVADA

No. 85109

\* \* \* \* \*

Keith Sullivan

Case No. 85075

Petitioner,

-vs-

**MOTION TO EXTEND PRISON  
COPYWORK LIMIT**

Perry Russell, Warden et al.,

Respondents.

COMES NOW, Petitioner, Keith Sullivan, in pro se,  
and submits his Motion to Extend Prison Copywork Limit, moving  
the Court to order the Nevada Department of Corrections ("NDOC")  
to extend his copywork limit for the narrow purposes of the  
instant habeas corpus proceedings.

This motion is based upon NDOC Administrative Regulation  
("AR") 722; all papers and documents on file herein; and the  
following points and authorities.

**POINTS AND AUTHORITIES**

Petitioner is an indigent prisoner, as demonstrated by the  
Motion for Leave to Proceed In Forma Pauperis on record herein.  
NDOC AR 722.01(7)(D) allows Petitioner to accrue a \$100.00 debt  
against his account towards legal copywork which, once reached,  
prohibits him from accumulating any further indebtedness for

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22-27576

1 such copywork. "Exceptions to this rule would be a court order  
2 received directly from the courts..." Id. The AR therefore  
3 gives this Court authority to issue an order allowing Petitioner  
4 to exceed his copywork limit.

5 Petitioner has reached or exceeded the \$100.00 limit of AR  
6 722.12. As such, NDOC has prohibited him at this time from  
7 receiving any further legal copywork in the instant proceeding  
8 unless the Court issues an order allowing him to do so.

9 Petitioner's grounds have merit. As such, he is entitled  
10 to relief in the instant habeas proceedings; however, he  
11 requires copywork services in order to litigate his instant  
12 petition. In addition to his originals of all pleadings,  
13 motions and other documents in this case, he will need copies to  
14 serve upon Respondents per FRCP 5, LR 5-1 and LR 7-2.  
15 Additionally, he will require a copy of same for his own  
16 records. See e.g. Gluth v. Kangas 951 F.2d 1504, 1510 (9th Cir.  
17 1991) (a reasonable amount of copywork for prisoners is found in  
18 that required to file, serve opponents and maintain copy for  
19 inmate's records).

20 Petitioner does not herein seek a blanket order for  
21 unlimited copywork, but seeks only a reasonable allowance of  
22 copywork for documents relevant to the instant proceeding,  
23 including, but not limited to, supplemented/amended pleadings,  
24 motions, responses, replies, notices, etc. Id.

25 As Petitioner's liberty is at the heart of these  
26 proceedings, he should be provided an extension of his copywork  
27 limitation in order to render him reasonably capable of fairly  
28 litigating this habeas action.

1  
2  
3 CONCLUSION

4 For the reasons set forth above, the Court should direct  
5 the NDOC to extend Petitioner's copywork limitations towards the  
6 allowance of receiving copies of documents pertinent to the  
7 instant habeas proceedings.

8 Dated this 25 day of August, 2022.

9 Keith Sullivan  
10 Keith Sullivan # 92630

11 S.D.C.C.

12 Indian Springs, Nevada 89070

13 Petitioner In Pro Se

14 CERTIFICATE OF SERVICE

15 I do certify that I mailed a true and correct copy of the  
16 foregoing to the below address on this 25 day of  
17 August, 2022, by placing same in the hands of  
18 prison law library staff for posting in the U.S. Mail:

19 Nevada Attny Gen. Office  
20 100 N. Carson St.  
21 Carson City, NV 89702

22 Nevada Supreme Court  
23 201 S. Carson St.  
24 Carson City, NV 89702

25 Attorney For Respondents

26 Keith Sullivan  
27 Keith Sullivan

28 Petitioner In Pro Se

**AFFIRMATION**  
Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding Motion

to Extend Prison Copywork Limit  
(Title of Document)

Supreme  
filed in ~~District~~ Court Case number 199 75075



Does not contain the social security number of any person.

-OR-

☐ Contains the social security number of a person as required by:

A. A specific state or federal law, to wit:

\_\_\_\_\_  
(State specific law)

-or-

B. For the administration of a public program or for an application  
for a federal or state grant.

Ken Gray  
Signature

8/25/22  
Date

Keith Sullivan  
Print Name

Petitioner IN PRO SE  
Title