

IN THE SUPREME COURT OF NEVADA

GODERICK VILADELGADO,
PETITIONER,
V.

CASE NO. C-20-3474461

DEPT. NO. XVII

85273

FILED

SEP 21 2022

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

THE EIGHT JUDICIAL
DISTRICT COURT OF
NEVADA, IN CLARK
COUNTY, RESPONDENT.

MOTION TO AMEND

THE PETITIONER, GODERICK VILADELGADO,
ASK THE COURT FOR LEAVE TO FILE AN AMEND
COMPLAINT UNDER RULE 15 (a).

1. PRAYER FOR RELIEF

PETITIONER/PLAINTIFF RESPECTFULLY PRAYS,
INCLUDING ALREADY MENTIONED IN PETITION
FOR WRIT OF MANDAMUS SENT ON AUGUST
29, 2022, THAT THIS COURT:

a. DECLARE THAT THE ACTS AND OMISSIONS
DESCRIBED IN THE PETITION VIOLATED
PLAINTIFFS' RIGHTS UNDER THE CONSTITUTION

AND LAWS OF THE UNITED STATES;

b. ORDER RESPONDENT TO PAY NOMINAL
DAMAGES;

c. ORDER DEFENDANTS/RESPONDENT TO PAY
PUNITIVE DAMAGES;

d. ORDER RESPONDENT TO PAY REASONABLE

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22-29702

ATTORNEY FEES AND COSTS; AND

E. GRANT OTHER JUST AND EQUITABLE RELIEF
THAT THIS HONORABLE COURT DEEMS
NECESSARY.

II. CAUSES OF ACTION

1. PETITIONER INCORPORATES ARGUMENTS
ALREADY MENTIONED IN PETITION.
2. RESPONDENT VIOLATED NAC 213.514
WHEN THEY ESTABLISHED THE RISK LEVEL
AS MODERATE RISK WHEREAS THE OBJECTIVE
RISK ASSESSMENT OF ZERO TOTAL RISK
ASSESSMENT SCORE SHOULD ESTABLISH
LOW RISK LEVEL.

DATED: SEPTEMBER 14, 2022.

RESPECTFULLY SUBMITTED,



GODRICK VILADELGADO

#1237799

HIGH DESERT STATE PRISON

P.O. BOX 650

INDIAN SPRINGS, NV 89070