

IN THE SUPREME COURT OF THE STATE OF NEVADA

FILED

MATTHEW TRAVIS HOUSTON,

No.(s) 79408

VS.

84885 SEP 28 2022

THE STATE OF NEVADA

No.(s) 84281

84478

84886

85353

MANDALAY BAY CORP, ET AL

No.(s) 80562

80562-COA

84417

84418

84477

84887

~~No.(s)~~ 85352 ✓

BRIAN P. CLARK, ET AL

No.(s) 85354

EMERGENCY EX PARTE EN BANC AS A LETTER
OF MOTION AND RENEWED PETITION FOR A WRIT
OF MANDAMUS AND OTHER INTERPLEADINGS NOT
LIMITED TO A ~~AND~~ MERITORIOUS INTERVENTION

RECEIVED

"de novo hearings demanded"

SEP 27 2022

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

ALL members of justice on the SUPREME
COURT for the STATE OF NEVADA will now read
the attached interpleading as will the clerks and
any and all other agents/associates/employees/etc.:

22-30443

EMERGENCY - EX PARTE - EN BANC - AS -
A - LETTER OF MOTION

Case Number(s) A-22-856372-C

Joinder → A-22-758861-C

A-22-853203-W

NEVADA DEPARTMENT OF CORRECTIONS
INFORMAL GRIEVANCE

Department - 20
Dept. XI

NAME: MATTHEW TRAVIS HOUSTON I.D. NUMBER: 1210652

INSTITUTION: HOSP "SMU" UNIT: 3A34

GRIEVANT'S STATEMENT: OATH and WILL from American Bar

Association Member No. 04662784 (LETTER OF MOTION
TO CHAMBERS). I am proud of Elli Roohani today in her

adherence to principle regarding the 6 year minimum
she imposed upon the burglar who skipped bail to go

SWORN DECLARATION UNDER PENALTY OF PERJURY (P. #1 of 7)

INMATE SIGNATURE: Matthew Travis Houston DATE: 8-31-22 TIME: 6PM

GRIEVANCE COORDINATOR SIGNATURE: _____ DATE: _____ TIME: _____

GRIEVANCE RESPONSE: _____

CASEWORKER SIGNATURE: _____ DATE: _____

___ GRIEVANCE UPHELD ___ GRIEVANCE DENIED ___ ISSUE NOT GRIEVABLE PER AR 740

GRIEVANCE COORDINATOR APPROVAL: _____ DATE: _____

___ INMATE AGREES ___ INMATE DISAGREES

INMATE SIGNATURE: _____ DATE: _____

FAILURE TO SIGN CONSTITUTES ABANDONMENT OF THE CLAIM. A FIRST LEVEL GRIEVANCE MAY
BE PURSUED IN THE EVENT THE INMATE DISAGREES.

Original: To inmate when complete, or attached to formal grievance
Canary: To Grievance Coordinator
Pink: Inmate's receipt when formal grievance filed
Gold: Inmate's initial receipt

MAILED TO CHAMBERS+
-OMANA - NEBRASKA-

**NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM**

NAME: MATTHEW TRAVIS HOUSTON I.D. NUMBER: 1210652

INSTITUTION: HDSP - "SMU" BMU UNIT #: 3A34

GRIEVANCE #: _____ GRIEVANCE LEVEL: INFORMAL

GRIEVANT'S STATEMENT CONTINUATION: PG. 2 OF 7

ruin people's lives in California when he was 17 and is now not even 25. I suffer from CPTSD (complex post-traumatic stress disorder) and numerous other impairments, and I ~~was~~^{shed} tears of empathy today, especially after the lady who received drug court informed the public about the recent suicide of her 13 year old son.

Other than to inform you of my renewed ABA Membership No. 04662784 (due in part to my companion, Andrew P. Gordon helping me to recover what's left of my law office that was destroyed in Iowa~~s~~ to which the defendants caused my loss of over \$36,500,000.⁰⁰ in losses of client intel, antiques and irreplaceable things not limited to my trusty K-9 UNIT, JOHNNY CASH and LIL' GEORGE LUCAS), I am writing to ~~inform~~^{elaborate} on my statement today,

Original: Attached to Grievance
Pink: Inmate's Copy

**NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM**

NAME: MATTHEW TRAVIS HOUSTON I.D. NUMBER: 1210652

INSTITUTION: HDSP "SMU-BMU" UNIT #: 3A 34

GRIEVANCE #: _____ GRIEVANCE LEVEL: INFORMAL

GRIEVANT'S STATEMENT CONTINUATION: PG. 3 OF 7

during which I thanked you for service to the town, NDOC NIELSON and company, and stated my 38 years of experience in dealing with criminal justice reform advocacy. I cannot afford to be any further misinterpreted. What has been difficult is feeling that NDOC staff probably think that I'm full of hot air, because I'd requested personal recommendations to NDF NEVADA DIVISION OF FORESTRY "FIRE-CAMP", Law Library clerk and Governor's Mansion jobs. Regardless of my factual and actual innocence, and being subjected to a violent and inhumane environment, I have been an over-achiever for 39 years. Too bad for the community that Judge Villani, Magistrate DeLaGarza, Mary Kay Holthus ^{or} ~~and~~ neither was Chief Linda informed of my valor. I am struggling with developing new relationships due to the events of my ONE OCTOBER

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**NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM**

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GRIEVANT'S STATEMENT CONTINUATION: PG. 4 OF 7

2016 and ONE OCTOBER 2017. This is where I am
issuing FORMAL REQUEST FOR INTERVENTION... Not only
in a legal "INTERVENTION" proceeding, but because of
being forced against my will to overstep potential
boundary lines between myself and the NDOC Caseworker(s)
as the difficulty of my current misclassification, in
addition to ~~my~~ ^{the} wrongful conviction and extensive
incarceration. These days are just so difficult
because nobody understands the definitions or acts
with any sense of accountability, integrity, trust,
honesty or any other virtues. Nobody will help
me with obtaining materials for my "REAL TALK"
program and my property destruction claims are,
at this point exponential (as allegedly some of my
investigation is in NDOC "PROPERTY ANNEX" and it
seems that nobody is helping with anything ...

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Pink: Inmate's Copy

**NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM**

NAME: MATTHEW TRAVIS HOUSTON I.D. NUMBER: 1210652

INSTITUTION: HOSP "SMU-BMU" UNIT #: 3A34

GRIEVANCE #: _____ GRIEVANCE LEVEL: INFORMAL

GRIEVANT'S STATEMENT CONTINUATION: PG. 5 OF 7

I had contributed just under \$92,000.⁰⁰ to the REAL TALK PROGRAM, and numerous other most honorable organizations over the last 39 years of my life and I'm concerned as to specifically and just why exactly I am in your "NDOC"? Illegally and for a 2ND term, especially as our non-existent Law Library are providing error, if anything at all. In the closing of a door to a diamond in the rough, I must reiterate that not all of us lawyers are ambulance chasers. Although it is rare, some of us actually care, about things other than money. Ell:, I am concerned regarding your order ~~for~~ appointment of counsel, and how that effects my reputation to the ABA, the Hague, the Ministry of Justice, the Vatican and so many of my associates, friends and family...

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Pink: Inmate's Copy

**NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM**

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GRIEVANT'S STATEMENT CONTINUATION: PG. 6 OF 7

Pursuant to Napoleonic Code, I demand respect
and timely accomodations in the motion for
expidition of briefing schedule(s) and further
motions for additional REINSTATEMENT OF BRIEFING
SCHEDULES. And where's my executive clemency
and pardon? Hidin' FROM BIDIN? Such valued
dreams of expiditious reality were of no value to
the genocide against my people, the Maguoketa,
to your UNION ARMY conspiray were they Mr.
Ulysses? This property destruction claim is quite
exponential and retroactive pursuant to filed
tolling motions. I WILL track down SKYWALKER
from 2019 @ THVCC, via my psychic agents @
LVMPD, as he's most likely dead already. Please
tip your medium as I tip this orange cup out
of 39 years of sustained OBLIVION towards FREEDOM.

Original: Attached to Grievance
Pink: Inmate's Copy

7

1 POINTS AND AUTHORITIES are not limited to the reason of law listed below:

2 The day that Plaintiff was transferred to Las Vegas City Jail to face double-jopardy
3 charges in Las Vegas Municipal Court, #C1248584A and #C1257802A, shows this
4 court the failure of communication by the Plaintiff's now-dismissed counsel with
5 his client. This further shows that Plaintiff did not enter any sort of guilty plea to
6 Case No. C-21-357927-1 and insisted upon proceeding to trial. See, State v. Huebler
7 128 Nev. 192, 275 P.3d 91, 128 Nev. Adv. Rep. 19, 2012 Nev. LEXIS 53 (Nev. 2012),
8 cert. denied, 568 U.S. 1147, 133 S. Ct. 988, 184 L. Ed. 2d 767, 2013 U.S. LEXIS 1009
9 (U.S. 2013).

10 NRS 34.726 validates Plaintiff's claims of ineffective assistance of counsel in
11 that it meets procedural requirements having been raised in a timely petition when
12 Plaintiff had requested to withdraw his plea during a video-court appearance prior to
13 December in which the "substitute" judge had appointed Anthony M. Goldstein to
14 represent Plaintiff in determining the prospective motions validity. Plaintiff was
15 prejudiced by Benard Little's failure completing an application to Mental Health
16 Court and the delay to Drug Court interview post-conviction on December 10th.

17 Plaintiff has been overwhelmingly prejudiced in this case, especially with the
18 initial statement made by the Prosecution labelling him as "a danger to society"
19 and when Judge Tierra Danielle Jones, after Benard Little neglectfully
20 failed to rebut the false pretenses made by Rosemarie McMorris-Alexander,
21 made personal comments further insulting the character of the Plaintiff after
22 he invoked his 5th Amendment rights- considering the fact prior the Plaintiff
23 being in state custody, he had never seen Rosemarie McMorris-Alexander
24 in person, up-close or from afar; nor had the Plaintiff communicated with
25 McMorris-Alexander via telephone, email, social media or any other
26 communicable device.

27 Plaintiff was denied his constitutional right to represent himself without
28 counsel when the substitute judge appointed Anthony M. Goldstein. See, Hollis

1 v. State, 95 Nev. 664, 601 P.2d 62, 1979 Nev. LEXIS 637 (Nev. 1979). "Unreliable" is
2 is self-explanatory. See, Buffalo v. State, 111 Nev. 1139, 901 P.2d 647, 111 Nev.
3 Adv. Rep. 127, 1995 Nev. LEXIS 125 (Nev. 1995).
4 Judge Tierra Danielle Jones and every other individual refusing to take
5 accountability for the current injustices against Plaintiff is guilty of violating
6 NRS 484.219 [renumbered to NRS 484E.010] and should be charged with leaving
7 the scene of a single accident because deliberate indifference is wrong- just as
8 Rosemarie McMorris-Alexander's lies she told on record were. See, Firestone v. State,
9 120 Nev. 13, 83 P.3d 279, 120 Nev. Adv. Rep. 3, 2004 Nev. LEXIS 3 (Nev. 2004). Further-
10 more, the credit for presentence incarceration of the Plaintiff is inaccurate. See,
11 Graffin v. State, 122 Nev. 731, 137 P.3d 1165, 122 Nev. Adv. Rep. 63, 2006 Nev.
12 LEXIS 70 (Nev. 2006).

13 Now see the FOURTH AMENDMENT OF THE U.S. CONSTITUTION (ie., "Fruit of the
14 POISONOUS Tree"). The Fourth Amendment requires that a search and seizure be
15 pursuant to a warrant supported by probable cause. Exceptions to the warrant
16 requirement under Terry include "traffic stops," of which must meet Terry requirements.
17 The Fourth Amendment places strict limitations on the State in its exercise of
18 power and authority.

19 Framing an injured worker for the second time and interfering with official acts
20 of the pleadings of Case No. A-17-758861-C, making false claims of supposed
21 "lifetime re-opening rights" to a claim that was catastrophic in nature and never
22 was to have been closed is *not* a valid exercise of constitutional authority in
23 Nevada or anywhere else in USA- especially Colorado, Iowa, and California.

24 Plaintiff committed none of these AGGRAVATING STALKING offenses as shown
25 on record by the fallible victim, Rosemarie McMorris-Alexander, whom the
26 Plaintiff had never even seen until brought to unfair hearings, has no
27 clue as to where she or her family resides. And it's perfectly legal and
28 the correct way that the Plaintiff reported SEDGWICK's scams with Dianne

1 Ferrante and Jonathon Shockey to LVMPD House Arrest Division; as it is the
2 Plaintiff who is the real and true victim of their negligent scam of extortion. The
3 state government trampled on Plaintiff's rights to be protected from unlawful
4 search and seizure, his rights as an American citizen, and desecrated the
5 Americans with Disabilities Act of 1993.

6 See 249 So. 2d 908, 918: This miscarriage of justice is a justiciable controversy
7 in that the dispute involves legal relations of parties who have real adverse interests,
8 and upon whom judgment may effectively operate through a decree of conclusive
9 which was defamed by the lies of the Defendant-Respondants, including the
10 Nevada Ombudsman of Consumer Health Assistance.

11 See 155 S.E. 2d 618, 621: This dispute is *not* in any way hypothetical, contingent
12 or abstract other than the fact that insurance claim adjusters might be paid kickbacks
13 and/or contingency fees to see Plaintiff-Appellant is denied his lawful indemnity, which
14 is what has happened on more than one occasion since his incurring of numerous
15 catastrophic injuries and multiple wrongful convictions. This court was not justiciable
16 in accepting Plaintiff's original plea nor was it fair or feasible for Prosecution to
17 conjure up the Information/Indictment on a permanently, totally-disabled worker as
18 result of the false pretenses made against the Plaintiff and other injustices he has
19 imperiously suffered.

20 The fact that this Court stood with a lying workers' compensation adjuster's
21 supervisor is pervasively and the continuous noticeable errors made by this
22 Court are extremely prejudicial to the Plaintiff, harmful in the utmost ways to him
23 and his family and friends, and warrant an immediate review by the Supreme
24 Court of the State of Nevada. See, 178 P.2d 341.

25 To explain the conflict between attorney, Plaintiff and this Court in both civil
26 and criminal case(s), the Clark County Public Defender's Office contributed to
27 Plaintiff's indigent status; while the history of the Las Vegas judicial system
28 being overwhelmingly biased against injured workers and their claims shows how

1 courts value the big insurance companies over the health, rights, and freedoms of
2 *the People*[.]. See, *Clark v. State*, 108 Nev. 324 (1992).

3 Plaintiff was unable to telephone Anthony M. Goldstein due to indigence and code
4 disallowing collect calls; nor was he provided any sort of telephone number to his
5 court-appointed attorney's office and insufficiently visited by the Clark County Public
6 Defender's office. See, *Young v. State*, 120 Nev. 965 (2004).

7 To reference for further use page __, Plaintiff-Appellant was subjected to double-
8 jeopardy that which began before he was arrested since the warrant was illegal due to the
9 facts that the Plaintiff was never served with any sort of summons/warrant to the charges
10 made against him; nor was he informed that any sort of crime had allegedly taken place-
11 especially because he did *not* reside within the jurisdiction of the State of Nevada. See,
12 *State v. Blackwell*, 65 Nev. 405, 198 P.2d 280, 1948 Nev. LEXIS 65 (Nev. 1948) cert. denied;
13 336 U.S. 939, 69 S. Ct. 742, 93 L. Ed. 1047, 1949 U.S. LEXIS 2642 (U.S. 1949).

14 This false imprisonment of the Plaintiff amounts to kidnapping by the fact that both his
15 person and his trained service animals were removed from 3041 St. Rose Parkway, Henderson, NV
16 to another location. See 174 N.E. 112, 113. This unlawful removal was of a substantial distance
17 and substantial time period in an isolated place for the purpose of Sedgewick obtaining an award,
18 facilitating numerous felonies not only by both harming and terrorizing the Plaintiff. The inter-
19 ruptions of Plaintiff's workers compensation, social security and personal injury litigations and
20 advocacy is interfering with governmental function. See, Model Penal Code § 212.1. The abduction
21 being purportrated by employees of Sedgewick and in coercion with law enforcement has transformed
22 the Appellant's indemnity into nothing more than a criminal ransom demand.

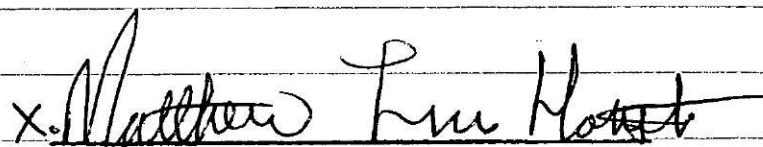
23 Not at any time has the Plaintiff ever felt comfortable with court-appointed counsel filing
24 his MOTION TO WITHDRAW PLEA while in custody because during a prior hearing the previous
25 case being heard involved a defendant who committed identity theft. What with Appellant being
26 a victim of identity theft, his duress increased.

27 This case illustrates how the State of Nevada cares not for its citizens, visitors, nor injured
28 workers and shows little if no regard for the health and mental/emotional security of the honest,

1 the permanently totally-disabled, their workplaces, survivors, friends and family- let alone
2 their pets and/or trained service animals. It is nothing more but a ploy and shallow attempt
3 to recruit more of the poor and unlucky into the forced slave-labor camps of the Nevada Division
4 of Forestry (NDF); so that corporate welfare may take advantage of the working-class while
5 profitting off of the weak and underprivileged, caring not of the freedom nor of the imprisoned.
6 The malicious prosecution employed expeditive tactics in obtaining their wrongful convictions
7 to obstruct not only the Plaintiff's entire life but they have delayed the orderly process of the
8 criminal justice system in siding with an insurance scam over the true victim, that being this
9 Principal and Plaintiff-in-Error, Matthew Travis Houston.

10 WHEREFORE, the undersigned demands that this Court conducts proper and accurate
11 judicial reviews of this case and all others related to the Plaintiff,
12 Matthew Travis Houston.

13
14 DATED: this 21st day of September, 2022.

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16
17
18
19
20 X. 
21 MATTHEW TRAVIS HOUSTON
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