

Todd Robben
In Pro Se
P.O. Box 4251
Sonora, CA 95370
(209)540-7713

FILED

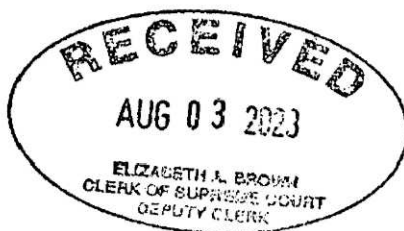
AUG 04 2023

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY *Elizabeth A. Brown*
DEPUTY CLERK

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

TODD ROBBEN,)	
)	Supreme Court Case No.: 86096
Appellant,)	
)	
vs.)	
)	
THE ESTATE OF THOMAS)	
JOSEPH HARRIS; AND)	
THOMAS J. HARRIS TRUST,)	
Respondents.)	

**APPELLANT'S REQUEST FOR LEAVE TO FILE A 46 PAGE
REQUEST FOR SANCTIONS AGAINST RESPONDENT AND THE
FACTS ALONE ARE MORE THAN THE RULES ALLOW FOR**



23-25043

Appellant Todd Robben requests leave to file a request for sanctions that may fall under NRAP 27 and require leave to exceed the allowable page limit.

Good cause exists because the numerous facts alone exceed the limit and the Appellant is not a lawyer. The facts demonstrate the most serious sanctionable offences that the Respondent and its lawyers have used against the Appellant and this Honorable Court including fabricating evidence, perjury and judicial deception.

The Appellant has articulated the facts, included the relevant law and case law along with embedding relevant evidence to make the document easy to read and understand.

If the Appellant is forced to squeeze the same information in less page, he will just refer to the overflow as exhibits.

The matter is urgent, the Appellant is indigent and the gravity of the situation demands an immediate resolution.

The Respondent cannot prevail and this Court is allowing Respondent "Another bite at the apple" and rewarding bad behavior.

An example of the the request for sanctions includes the fact Appellant was never electronically served July 7, 2023 by the Respondent or anyone else including the Court or the electronic

filing system. The Appellant, in *pro se*, is not even registered to use the electronic filing system pursuant to NRAP rule 25(5)(c)(1)(E) “notice by electronic means to registered users of the court’s electronic filing system consistent with NEFCR 9.” Appellant has no notification from the electronic filing system of any filings on July 07, 2023 – or any other date. There are no emails or any other proof/evidence the Respondent electronically served the Appellant on July 07, 2023.

The Certificate of Service pictured below is from the Respondent’s July 07, 2023 Motion for Reconsideration which shows the Respondent sent service to the Appellant by U.S. Mail and the Court’s e-filing system. This material evidence was signed under penalty of perjury.

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am an employee of *WALLACE & MILLSAP* that I am over the age of eighteen (18) years, and that I am not a party to, nor interested in this action. On this date, I caused to be served a true and correct copy of the foregoing document on all parties to this action by placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Reno, Nevada postage paid, following the ordinary course of business practices as follows:

Todd Robben
P.O. Box 4251
Sonora, California 95370

The foregoing document was also served upon Todd Robben through the Nevada Supreme Court's e-filing system.

DATED this 7th day of July 2023.

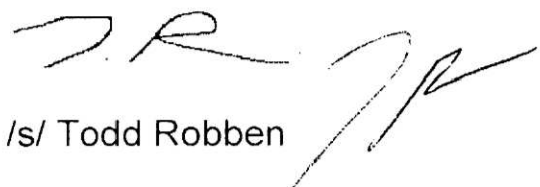
By: /s/ Caroline Carter
Employee of Wallace & Millsap

Obviously Caroline Carter, who did not actually sign the document, has committed perjury claiming the Appellant was served via the Nevada Supreme Court e-filing system. Mr. Wallace doubled-down this subordinated Ms. Carter's perjury and used it as his facts supporting his frivolous argument.

Essentially this is a discovery issue because this evidence proffered by the Respondent is fabricated – and based on a lie.

This Court may impose case-concluding sanctions for non-compliance with its orders under NRCP 37(b)(1). Blanco v. Blanco, 129 Nev. 723, 729, 311 P.3d 1170, 1174 (2013). Case-concluding sanctions may include striking pleadings, dismissing the action, or entering a default. Id. "In addition to this rule-based authority, the court has the inherent equitable power to enter defaults and dismiss actions for abusive litigation practices." Id. (citing Young, 106 Nev. at 92, 787 P.2d at 779).

Respectfully signed under penalty of perjury,

A handwritten signature in black ink, appearing to read 'T. Robben', followed by a large, stylized flourish or checkmark-like mark.

/s/ Todd Robben

August 01, 2023

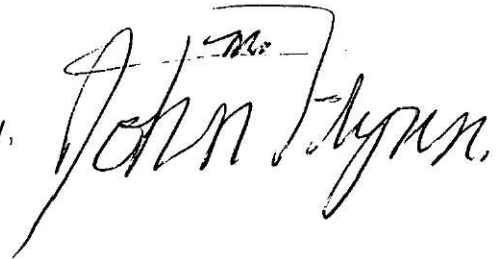
CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I certify that on the date indicated below, I served a copy of this Request for Sanctions to the parties pursuant to NRCP 5(b) by depositing an email to: F. McClure Wallace, counsel for Respondent, mcclure@wallacemillsap.com

DATED August 01, 2023

Signed under penalty of perjury,

A handwritten signature in black ink that reads "John Flynn". Above the first name, there is a small, handwritten "Mr." with a line through it.

/s/John Flynn

John Flynn

180 Upper Sunset

Sonora, CA 95370