

Todd Robben
In Pro Se
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FILED
AUG 29 2023
ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY *[Signature]*
CHIEF DEPUTY CLERK

IN THE SUPREME COURT OF THE STATE OF NEVADA

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

APPELLANT'S REPLY IN SUPPORT OF VERIFIED REQUEST FOR
SANCTIONS AGAINST RESPONDENT AND RESPONDENT'S
COUNSEL



Appellant, Todd Robben, *in pro se* replies in support of his motion for sanctions because the Respondent had concede to the motion and not filed any opposition for sanctions.

Respondent's Counsel, Fred M. Wallace, filed no objection in an effort to likely assert U.S. Fifth Amendment self incrimination, *did not even try to deny the facts*, further perjure himself, and taint his false narratives. In doing so, all facts as a matter of law, are conceded by the Respondent and Counsel Fred M. Wallace.

With no opposition to this instant motion, the Respondent conceded and the Court must grant the Appellant's meritorious motion for sanctions and agree that fabricated evidence, and then using it to attempt to dismiss your opponents case is a case concluding sanction, also know as the "Civil Death Penalty". Additionally, the Honorable Court must order the State bar to disbar Fred M. Wallace and refer the criminal matters to the State Attorney General. Anything less defiles the Court itself and would reward not only unethical behavior, but criminal behavior as admitted to in the pleadings.

MEMORANDUM OF POINTS AND AUTHORITIES

The Responded did not timely object within seven days pursuant to NRAP 27(a)(3)(A).

“This court concludes that appellants concede the merit of respondent's motion.” See Foster v. Dingwall, 126 Nev. 56, 66, 227 P.3d 1042, 1049 (2010) (stating that this court may construe the failure to oppose a motion as an admission that the motion is meritorious).

Respectfully signed under penalty of perjury,

A handwritten signature in black ink, appearing to read 'T.R. Robben', with a stylized flourish at the end.

/s/ Todd Robben

August 24, 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 24, 2023

Signed under penalty of perjury,

A handwritten signature in black ink, appearing to read "John Flynn". The signature is stylized with a large, sweeping "J" and a long horizontal stroke extending to the right.

/s/John Flynn

John Flynn

180 Upper Sunset

Sonora, CA 95370