

FILED

DEC 13 2023

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY *Melissa*
DEPUTY CLERK

1 ROBERT BEADLES
2 10580 N. McCarran Blvd. #115, Apt. 386
3 Reno, NV 89503
4 Appellant, In Pro Per

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

6 MR ROBERT BEADLES, an individual,
7 Appellant,
8 vs.

NVSC Case No.: 87683
District 1 Case No: 23-OC-00105 1B
District 2 Case No: CV23-01341

9 JAMIE RODRIGUEZ, in her official
10 capacity as Registrar of Voters and in her
11 personal capacity; the WASHOE COUNTY
12 REGISTRAR OF VOTERS, a government
13 agency; ERIC BROWN in his official
14 capacity as WASHOE COUNTY
15 MANAGER and in his personal capacity,
16 ALEXIS HILL in her official capacity as
17 CHAIRWOMAN OF WASHOE COUNTY
18 BOARD OF COMMISSIONERS and in her
19 personal capacity; WASHOE COUNTY,
20 Nevada a political subdivision of the State
21 of Nevada, and DOES I-X; and ROE
22 CORPORATIONS I-X.

23 Respondents.

24 **MOTION TO TRANSFER EXHIBITS TO SUPREME COURT**

25 **Introduction**

26 This urgent motion implores the Supreme Court of Nevada to direct the transfer of all
27 pivotal exhibits from the District Court, Judicial District 1. The extensive citation of
28 these exhibits in my Appellant's opening brief is not merely for reference but forms
the backbone of my legal arguments, making their review essential for justice.

29 **Statement of Facts**

30 The appellant's case in the Second Judicial Court of Washoe County, transferred to,
31 then dismissed with prejudice by Judge Russell in Carson City, First Judicial District,
32 is underpinned by over 160 exhibits. These documents are not just evidence; they are

33 **RECEIVED**
34 DEC 13 2023
35 ELIZABETH A. BROWN
36 CLERK OF SUPREME COURT
37 DEPUTY CLERK

23-40416

1 the crux of my legal stance against the miscarriage of justice that occurred in the
2 lower court.

3 Summary of the Argument

4 **a. Gross Injustice in Venue Change Dismissal:** The denial of the change of venue
5 motion is not just flawed; it's a legal travesty. The evidence of bias in Carson City is
6 irrefutable, and the court's dismissal in light of this evidence is a blatant disregard for
7 the constitutional principles of due process and equal protection. My reliance on
8 precedents like *Azucena v. State* is not casual; it's foundational to our understanding
9 of an impartial judicial system.

10 **b. Flagrant Overlook of Evidence in Dismissal Under Rule 12(b)(5):** The court's
11 decision to dismiss the case under Rule 12(b)(5) is not just an oversight; it's a judicial
12 error of monumental proportions. The detailed allegations, backed by a plethora of
13 evidence, scream for legal scrutiny, not dismissal. Exhibits for example like 72, 23,
14 and 24, are not mere paperwork; they are concrete proof of legal violations that
15 demand a trial.

16 **c. Unwarranted Dismissal of Second Cause of Action:** The dismissal of the second
17 cause of action despite robust evidence conforming to Rule 8(a)(2) and NRS 283.440
18 is not just wrong; it's legally untenable. The allegations against the respondents,
19 bolstered by examples like Exhibits 136, 137, 143, and more, provide more than just
20 cause for their removal; they demand it.

21 **d. Unjust and Chilling Imposition of Costs:** Awarding costs to the respondents is
22 not just unfair; it's a slap in the face to every truth-seeker and whistleblower in
23 Nevada. This decision sends a dangerous message that the powerful are untouchable,
24 even in the face of blatant legal violations.

25 Argument

26 **Critical Role of Exhibits in Appellate Review:** The transfer of these exhibits is not a
27 procedural formality; it's a necessity for justice. Their absence from this Court's
28 review would not just be prejudicial; it would be a denial of the appellant's right to a
fair appeal.

Legal Obligation to Review Exhibits: This Court is not just requested but legally
obligated to direct the transmission of these exhibits. Their exclusion would not only
undermine the appellant's case but would also erode the very foundations of our legal
system.

1 **Judicial Error and Misapplication of Law:** The lower court's decision is not just
2 questionable; it's a glaring example of judicial error and misapplication of law. The
3 evidence presented demands not just consideration but thorough examination, which
can only be achieved with the exhibits in question.

4 **Heightened Standard of Review:** The application of a heightened standard of review
5 is not just appropriate; it's essential. The arbitrary and capricious nature of the lower
6 court's dismissal, as evidenced by the extensive supporting material, necessitates a
rigorous review.

7 **Proper Transmission of Exhibits:** The transmission of these exhibits is not a mere
8 administrative task; it's a legal imperative. The method of transmitting these
9 documents must ensure their integrity and accessibility for a just examination.

10 **Conclusion**

11 This motion emphatically requests the Supreme Court to issue an order for the
12 transmission of the exhibits from the District Court to the Supreme Court,
13 acknowledging their critical role in this appeal. This step is not just procedural; it's
14 fundamental to the pursuit of justice.

15 Respectfully submitted,

16
17 By: _____

18 ROBERT BEADLES, Appellant In Pro Per,

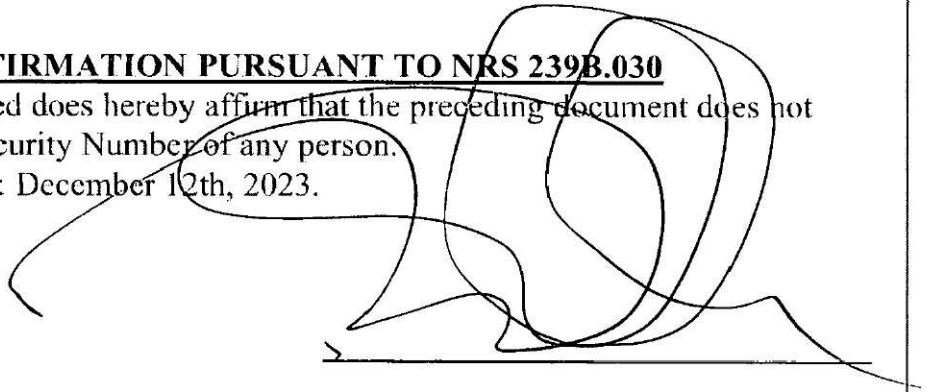
19 10580 N. McCarran Blvd. #115, Apt. 386,

20 Reno, NV 89503 916-573-7133
21
22
23
24
25
26
27
28

1 **AFFIRMATION PURSUANT TO NRS 239B.030**

2 The undersigned does hereby affirm that the preceding document does not
3 contain the Social Security Number of any person.

4 DATED: December 12th, 2023.

5 

6 Robert Beadles, Appellant In Pro Per
7

8
9
10
11 **CERTIFICATE OF SERVICE**

12
13
14 Pursuant to NRCP 5(b), I hereby certify that on December 12th, 2023, I served all
15 parties by electronically emailing the defense counsel and by sending via first-class mail
16 with sufficient postage prepaid to Lindsay Liddell, the respondents' defense attorney.

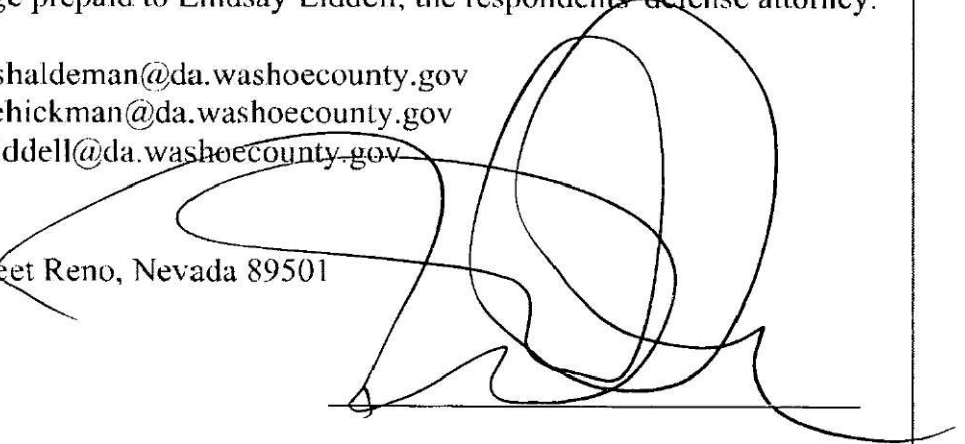
17 Haldeman, Suzanne shaldeman@da.washoecounty.gov

18 Hickman, Elizabeth ehickman@da.washoecounty.gov

19 Liddell, Lindsay L lliddell@da.washoecounty.gov

20 And mailed to:

21 One South Sierra Street Reno, Nevada 89501

22 

23 Robert Beadles, Appellant In Pro Per
24
25
26
27
28