

FILED

JAN 12 2024

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

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

IN THE SUPREME COURT OF THE STATE OF NEVADA

MR ROBERT BEADLES, an individual,  
Appellant,  
vs.

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

JAMIE RODRIGUEZ, in her official capacity as Registrar of Voters and in her personal capacity; the WASHOE COUNTY REGISTRAR OF VOTERS, a government agency; ERIC BROWN in his official capacity as WASHOE COUNTY MANAGER and in his personal capacity, ALEXIS HILL in her official capacity as CHAIRWOMAN OF WASHOE COUNTY BOARD OF COMMISSIONERS and in her personal capacity; WASHOE COUNTY, Nevada a political subdivision of the State of Nevada, and DOES I-X; and ROE CORPORATIONS I-X.

Respondents.

**Request for Leave to File Motion to Transfer Exhibits to Supreme Court**

**Introduction**

Respectfully, I approach the Supreme Court of Nevada with this request for leave, seeking authorization to file a motion for the transfer of essential exhibits from the District Court, Judicial District 1. The crucial nature of these exhibits in the appellant's arguments, as evidenced by their extensive

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
DEPUTY CLERK

24-01319

1 citation, necessitates their inclusion for a full and equitable review in the  
2 appellate process.  
3  
4

### 5 **Legal Basis for Granting Leave**

6  
7 In accordance with the legal principle that leave should be freely given, as  
8 stated in NRCP 15(a)(2), there is no presence of undue delay, bad faith, or  
9  
10 dilatory motive on my part. This ethos is further supported by legal  
11 precedents, including *Stephens v. S. Nev. Music Co.* 89 Nev. 104, 105-06,  
12  
13 507 P.2d 138, 139 (1973), *DeSoto v. Yellow Freight Sys., Inc.*, 957 F.2d  
14  
15 655, 658 (9th Cir. 1992), and *Nutton v. Sunset Station, Inc.*, Court of  
16 Appeals of Nevada, June 11, 2015, 131 Nev. 279, 357 P.3d 966. These  
17 cases reinforce the notion that in the absence of detrimental factors, the  
18 court should grant leave to ensure justice and procedural fairness.  
19  
20  
21

### 22 **Necessity of Exhibits for Appellate Review**

23  
24 **Integral to Legal Arguments:** The more than 160 exhibits are not merely  
25 supportive but are integral to the foundation of the case's legal arguments.  
26  
27  
28

1 **Ensuring Justice and Fairness:** The absence of these exhibits  
2 significantly compromise the depth and fairness of the appellate review.  
3

#### 4 **Specific Reasons for Exhibit Transfer**

5 **Venue Change Dismissal:** The exhibits are key in illustrating the alleged  
6 bias in the original venue, such as Exhibit 132, 154-56.  
7

8 **Dismissal Under Rule 12(b)(5):** For a small example, Exhibits 11-24, 97,  
9 101, 109 and 111 are vital for challenging the lower Court's decision to  
10 improperly dismiss the case pursuant to NRCP 12(b)(5).  
11  
12

13 **Second Cause of Action:** Exhibits such as 134 through 140, 143, 149, 168-  
14 170 are crucial for substantiating the allegations.  
15

#### 16 **Argument for Granting Leave**

17 **Adherence to Legal Standards:** This request aligns with the guiding  
18 principle that amendments should be freely granted when justice requires,  
19 as per NRCP 15(a)(2).  
20  
21

22 **Precedent Support:** The aforementioned legal precedents bolster this  
23 request, emphasizing the court's obligation to facilitate justice through  
24 procedural fairness.  
25  
26  
27  
28

1 **No Undue Delay or Bad Faith:** My request is timely and made in good  
2 faith, devoid of any intention to delay or derail the proceedings.  
3

4 **Conclusion**

5 In light of the legal precedents and rules cited, and considering the pivotal  
6 role of the exhibits in question, this request for leave to file a motion for the  
7 transfer of exhibits from the District Court is submitted with a sincere  
8 appeal to the principles of justice and procedural fairness. The inclusion of  
9 these exhibits is not just a procedural formality; it is a fundamental aspect  
10 of ensuring a fair and comprehensive appellate review. Therefore, I  
11 respectfully request the Supreme Court grant this motion, enabling a  
12 thorough and equitable consideration of the case at hand.  
13  
14  
15  
16

17  
18 Respectfully submitted,  
19  
20

21 By: \_\_\_\_\_

22 ROBERT BEADLES, Appellant In Pro Per,  
23

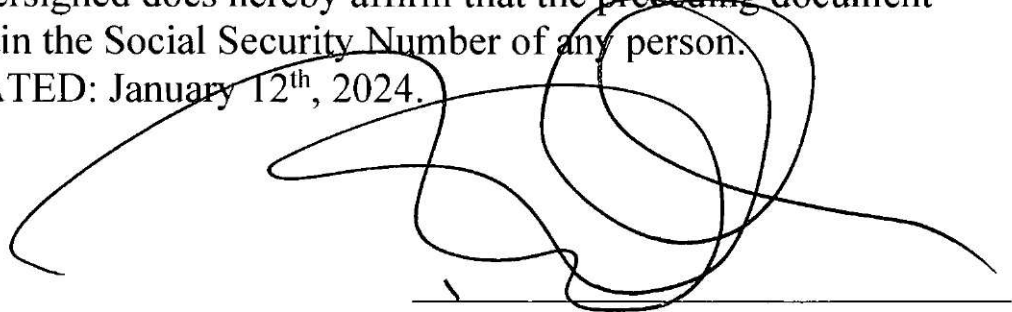
24 10580 N. McCarran Blvd. #115, Apt. 386,  
25

26 Reno, NV 89503 916-573-7133  
27  
28

1  
2  
3 **AFFIRMATION PURSUANT TO NRS 239B.030**

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

6 DATED: January 12<sup>th</sup>, 2024.

7  
8  
9 

10 Robert Beadles, Appellant In Pro Per

11  
12 **CERTIFICATE OF SERVICE**

13  
14 Pursuant to NRCP 5(b), I hereby certify that on January 12<sup>th</sup>, 2024, I served  
15 all parties by electronically emailing the defense counsel and by sending via  
16 first-class mail with sufficient postage prepaid to Lindsay Liddell, the  
17 respondents' defense attorney.

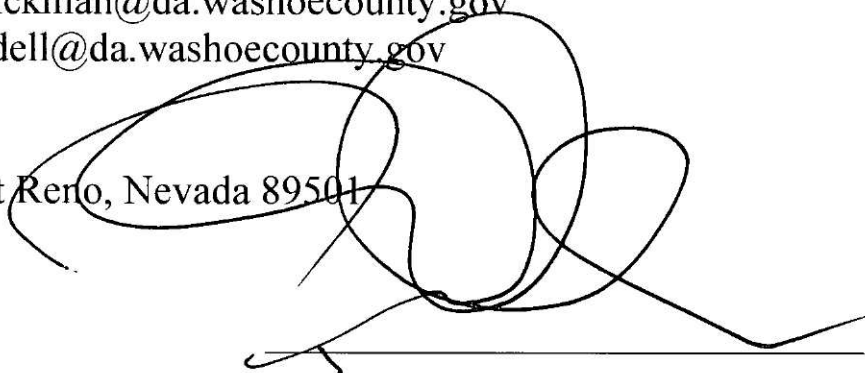
18 Haldeman, Suzanne shaldeman@da.washoecounty.gov

19 Hickman, Elizabeth ehickman@da.washoecounty.gov

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

21 And mailed to:

22 One South Sierra Street Reno, Nevada 89501

23  
24  
25 

26 Robert Beadles, Appellant In Pro Per