

Docket No. \_\_\_\_\_

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**In the Supreme Court of the United States**

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**ALI SHAHROKHI**

*Petitioner*

vs.

**WILLIAM "BILL" HENDERSON, MATHEW HARTEK, NEVADA  
STATE DISTRICT JUDGES, STEVE WOLFSON, CLARK COUNTY  
DISTRICT ATTORNEY**

*Respondents*

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**APPLICATION FOR EXTENSION OF TIME TO FILE  
PETITION FOR A WRIT OF CERTIORARI TO  
THE SUPREME COURT OF NEVADA**

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ALI SHAHROKHI  
9620 S. LAS VEGAS BLVD.  
SUITE 4, 152  
LAS VEGAS, NEVADA  
702-849-2001

**RECEIVED**  
JAN 11 2023  
OFFICE OF THE CLERK  
SUPREME COURT, U.S.

**PARTIES to the PROCEEDING**

The parties to the proceedings are Kizzy Burrow, William “Bill Henderson, Nevada District Court judge, Mathew Harter, Nevada District Court judge, Steve Wolfosn, Clark County District Attorney and Robert H. Thompson, Administrator of Nevada division of welfare who was not a party to this writ of mandamus.

**CORPORATE DISCLOSURE STATEMENT**

As per Rule 29.6, Petitioner, Shahrokhi, is a natural person. There is no parent corporation.

**RELATED PROCEEDINGS****US SUPREME COURT CASE:**

- SHAHROKHI v. BURROW- DOCKET NO. 22-6224

**STATE OF NEVADA CASES:**

- BURROW v. SHAHROKHI – A PATERNITY PETITION, CUSTODY DISPUTE,  
CURRENTLY

OPEN, CASE NO. D-18-581208-P, (A SEALED CASE).

- BURROW v. SHAHROKHI – A CHILD SUPPORT CASE, CURRENTLY OPEN, CASE  
No. R-21-218156-R.

**STATE OF OREGON CASES:**

- BURROW v. SHAHROKHI, A REGISTRATION OF FOREIGN CUSTODY ORDER,  
CHANGE OF JURISDICTION, CASE NO. 22DR14283.

**STATE OF NEVADA—APPELLATE CASES:**

- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, NOVEMBER 6, 2019, GRANTING PETITION FOR A WRIT OF MANDAMUS IN PART AND DENYING PETITION IN PART, CASE No. COA-79336, NEVADA COURT OF APPEALS.
  
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, JUNE 9, 2020, GRANTING PETITION FOR A WRIT OF MANDAMUS, CASE No. 82803, NEVADA SUPREME COURT.
  
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, JANUARY 2, 2020, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. COA-80277, NEVADA COURT OF APPEALS.
  
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, FEBRUARY 6, 2020, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. COA-80447, NEVADA COURT OF APPEALS.
  
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, JULY 28, 2020, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. COA-81218, NEVADA COURT OF APPEALS.
  
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, SEPTEMBER 18, 2020, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. COA-81791, NEVADA COURT OF APPEALS.
  
- SHAHROKHI v. BURROW, MAY 12, 2022, APPEALS AFFIRMED, THREE COMBINED CASES, CASE Nos. 81978, 82245, 83726, NEVADA SUPREME COURT.

- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, JULY 30, 2021, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. 83164, NEVADA SUPREME COURT.
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, OCTOBER 13, 2021, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. 83558, NEVADA SUPREME COURT.
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, NOVEMBER 16, 2021, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. 83772, NEVADA SUPREME COURT.
- SHAHROKHI v. BURROW, OCTOBER 28, 2021, DISMISSING APPEAL FOR LACK OF SUBJECT-MATTER JURISDICTION, CASE No. 83726, NEVADA SUPREME COURT.
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, FEBRUARY 2, 2022, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. 83973, NEVADA SUPREME COURT.
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, DECEMBER 23, 2021, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. 83927, NEVADA SUPREME COURT.
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, FEBRUARY 18, 2022, NO ACTION WAS TAKEN ON PETITION FOR WRIT OF MANDAMUS, CASE No. 84043.
- SHAHROKHI v. NEVADA COMMISSION ON JUDICIAL DISCIPLINE, FEBRUARY 10, 2022, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. 84124, NEVADA SUPREME COURT.

- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, APRIL 29, 2022, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. 84189, NEVADA SUPREME COURT.
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, MARCH 18, 2022, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No. 84341, NEVADA SUPREME COURT.
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, DECEMBER 6, 2022, DENYING PETITION FOR WRIT OF MANDAMUS, CASE No.85655, NEVADA SUPREME COURT.
- SHAHROKHI v. EIGHT JUDICIAL DISTRICT, CURRENTLY PENDING, CASE No. 85705, NEVADA SUPREME COURT.

**FEDERAL CASES:**

- SHAHROKHI v. HARTER, ET. AL., 2:20-cv-01019-APG-VCF, CASE DISMISSED UNDER YOUNGER ABSTENTION.
- SHAHROKHI v. HARTER, ET. AL., 2:20-cv-01623-JAD-NJK, CASE CURRENTLY STAYED UNDER YOUNGER ABSTENTION.
- SHAHROKHI v. TAO, ET. AL., 2:20-cv-02346-GMN-VCF, CASE DISMISSED.
- PHILLIPS, ET. AL., V. OCHOA, ET. AL., 2:21-cv-00483-APG-NJK, CASE DISMISSED UNDER YOUNGER ABSTENTION.
- SHAHROKHI v. HARTER, ET. AL., 2:21-cv-00557-APG-BNW, ERRONEOUS DISMISSAL BY THE DISTRICT COURT STATING: THE PLAINTIFFS HAVE NO CASE PENDING BEFORE JUDGE HARTER, SO THEY CANNOT SHOW THEY HAVE SUFFERED

PARTICULARIZED AND CONCRETE INJURY IN FACT. THEY THUS LACK STANDING TO ASSERT THESE CLAIMS. [SPOKEO, INC. V. ROBINS, 578 U.S. 330, 339-40 (2016)].

• SHAHROKHI V. THRONE, ET. AL., 2:22-CV-00001-JAD-VCF, CASE DISMISSED UNDER YOUNGER ABSTENTION.

**NINTH CIRCUIT COURT OF APPEALS CASES:**

• PHILLIPS, ET. AL., V. VINCENT OCHOA, ET. AL., 0:2021CV16030, AFFIRMED, COURT STATED YOUNGER ABSTENTION DOES NOT APPLY TO THIS CASE, YET AFFIRMED BASED ON ISSUE PRECLUSION.

• ALI SHAHROKHI, ET. AL., V. USDC-NEVADA, 0:2021OP71158, PETITION FOR WRIT OF MANDAMUS DENIED, PETITIONERS HAVE NOT DEMONSTRATED THAT THIS CASE WARRANTS THE INTERVENTION OF THIS COURT BY MEANS OF THE EXTRAORDINARY REMEDY OF MANDAMUS.

• ALI SHAHROKHI V. TAO, 0:2021CV16171, AFFIRMED.

• ALI SHAHROKHI V. DAWN THRONE, ET. AL., 0:2021CV16171, CURRENTLY PENDING BEFORE THE THREE-PANEL COURT.

• ALI SHAHROKHI V. HARTER, ET. AL., 0:2022CV15276, CURRENTLY PENDING BEFORE THE COURT.

RESPECTFULLY SUBMITTED,

/s/ALI SHAHROKHI, PETITIONER

SELF REPRESENTED (COUNSEL WILL BE RETAINED)

JANUARY 6, 2023

**To the Honorable Justice Elena Kagan:**

Pursuant to Supreme Court Rule 30.3, Petitioner, Ali Shahrokhi, (“Shahrokhi”), now makes this application to the Court, *respectfully*, for an extension of sixty (60) days to file his *Petition for a Writ of Certiorari*.

The Nevada Supreme Court entered a judgment denying Shahrokhi’s Petition for Writ of Habeas Corpus, Mandamus, or in the alternative a writ of Prohibition on Decemebr 6, 2023, in Case No. 85655 which is directly related to the Dometic violence fact findings and final child-custody order affirmance by Supreme Court of Nevada on May 12, 2022 . Shahrokhi’s *Petition for a Writ of Certiorari* is thus due on **MARCH 6, 2023**. This motion is being filed more than ten (10) days prior to that due date as required by Rule 13.5.

A copy of the Nevada Supreme Court's denial for a writ of habeas corpus is attached to this motion. This court's jurisdiction is invoked under 28 U.S.C. § 1254(1). Shahrokhi's case presents an important question of law involving whether a hearing master, who is not a judicial officer, can issue a bench warrant without oversight from a judicial officer or the judicial officer's knowledge or signature, using the bench warrant as a means of debt collection. This court has previously held that such practices create unnecessary risk that individuals' constitutional rights will be violated. Warrants must not be issued for failure to pay without providing adequate notice to a defendant. See Turner, 131 S. Ct. at 2519; Bearden, 461 U.S. at 671-72; Mullane, 339 U.S. at 314-15.

Another issue that the petitioner will raise before this court is whether state and local courts deprive defendants of due process and equal protection if they condition access to the courts on payment of fines or fees. This is done by requiring the petitioner to have permission from the state court before he can file an objection to the hearing master's recommendation that affects his liberty rights and puts him in jail without a judicial officer oversight, which is a direct violation of due process and the right to object and be heard. It has become the norm in Nevada as these so-called judges promote it.

The petitioner will also raise an issue of overreach by the Nevada government of a federally funded program under Title IV-D authority exacerbated by vague Nevada statutes. The Nevada public authority is the real party of interest in the IV-D program. The public authority has a pecuniary interest where they claim they have an interest in the welfare of the children, which is constitutionally limited by the *parens patriae* powers in such cases. Nevada statutes vaguely authorize the public authority to intervene in these cases as a "matter of right," which is unconstitutional because this program has federal limitations that the Nevada public authority is violating and ignoring. The Federal IV-D program law clearly states the limitation of the program to 1) families on welfare or 2) families at risk of falling on welfare, yet the Nevada public authority and statutes erroneously claim this as an absolute right so they can be involved in every case, bypassing federal law and rendering the action unconstitutional. It is a true overreach of authority by the State of Nevada.

There is currently an active bench warrant for the arrest of Shahrokhi in direct violation of his due process rights, as he will be put in jail for 5 days without a judicial officer's signature. The Nevada Statute allows for such a bench warrant to be fully active without the oversight and knowledge of a judicial officer, requiring only the signature of a district attorney employee or the hearing master, who has no judicial authority. The judicial officer department has, in writing, acknowledged that the judge had no knowledge of any bench warrant in his department, yet there is an active bench warrant fully in effect to arrest the petitioner and punish him for debt.

Because of so many violations of the petitioner's constitutional rights by the so-called Nevada Family Court judges and hearing master, Shahrokhi has been forced to bring many different lawsuits and appeals to compel the acknowledgement of his constitutional rights by the family court judges, who constantly ignore the US Constitution and believe that it falls to the discretion of a single family court judge to interpret it in family court. This is a common practice among family court judges in Nevada.



This Court held in *Troxell v Granvill* that the state has no authority to use a broad, vague "Best Interest Policy" to intrude on fit parents private decision making rights, yet Nevada continues to abuse such a broad statute and uses "best interest", ignoring constitutional rights to terminate parental rights without actually having to go through the judicial process. Nevada labels it as "primary custody" where one fit parent has no care, custody, or control of their children, all so the state can intrude in their private lives and create revenue by illegally forcing them into a federaly funded program where the only party that benefits from it is the state.

Such practices by the state are true violations of due process (procedural and substantive), privacy violations (familial privacy, decisional privacy, and data privacy), equal protection violations (similarly situated non-custodial parents being excluded), fundamental right violations (parental autonomy), and spending power violations (using public money for purely private purposes).

Shahrokhi respectfully thus requests a 60-day extension of time until May 5, 2023, in order to file the Petition for a writ of *cercerioti*.

Dated: **January. 6, 2023**

/s/ Ali Shahrokhi \_\_\_\_\_.  
Affiant

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**CERTIFICATE OF SERVICE**

A copy of this application was served via email and U.S. mail to parties listed below in accordance with Supreme Court Rules 22.2 and 29.3: I am an individual over the age of eighteen and not a party to the within action. My address is 9620 S. Las Vegas Blvd. Suite 4, 152 Las Vegas, Nevada 89123 . My phone number is (702) 849-2001.

On **January. 6, 2023**, I served the following:

Kizzy Burrow

16408 SW Timberland Dr.

Beaverton, OR 97007

Supreme Court of Neavda

201 South Casron St. Suite 201

Carson City, NV 89702

Bill Henderson/ Mathew Harter

601 N Pecos Rd.

Las Vegas, Nevada 89101

Steve Wolfson, District Attorney

200 Lewis Avenue

3<sup>rd</sup> Floor

Las Vegas, NV 89155

;

On an interested party in the above-entitled action by

\_\_\_ via e-mail transmission,

\_\_\_ personal service on the person below listed,

X  depositing it in the U.S. Mail, postage prepaid,

and addressed to the person below listed,

I declare under penalty of perjury under the laws of the United States,  
the foregoing is true and correct.

Dated: **January. 6, 2023**

/S/ ALI SHAHROKHI \_\_\_\_\_.  
Petitioner

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