

1 [REDACTED]
2 N. Las Vegas, NV [REDACTED]
3 (702) [REDACTED]
4 [REDACTED]@gmail.com
5 Defendant in Proper Person

6 **DISTRICT COURT**
7 **CLARK COUNTY, NEVADA**

8 [REDACTED]

9 Plaintiff,

10 vs.

11 [REDACTED]

12 Defendant

} Case No.: D-19-[REDACTED]-C
} Dept. No.: I

} Hearing Date:
} Hearing Time:

} **HEARING AND ORAL**
} **ARGUMENT REQUESTED**

13 **DEFENDANT'S MOTION TO STRIKE NON-CONFORMING MOTION**
14 **BY THIRD PARTY INTERLOPER ALEXANDER FALCONI AKA OUR**
15 **NEVADA JUDGES; MOTION TO VACATE COURT ORDER DATED**
16 **MARCH 27, 2022 PURSUANT TO NRCP RULE 60-B(6) ON THE BASIS OF**
17 **NRCP RULE 11 NONCOMPLIANCE BY ALEXANDER FALCONI**

18 NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS
19 MOTION WITH THE CLERK OF THE COURT AND TO PROVIDE THE
20 UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN TEN (14)
21 DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A
22 WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN TEN
23 (14) DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE
24 REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT
25 HEARING PRIOR TO THE SCHEDULED HEARING DATE.

26 COMES NOW Defendant, [REDACTED] Defendant in Proper
27 Person, and respectfully submits this MOTION as follows:

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1. Defendant seeks relief and legal remedy for RECENT ORDER unjustly entered on March 27, 2022 for lack of jurisdictional standing.
 2. Defendant also prays this court will recognize FALCONI aka OUR NEVADA JUDGES as merely a legal machine used to move and

1 influence courts in Nevada via online presentations of legal proceedings,
2 they capture on video with their unwanted intrusion into private custody
3 matters. OUR NEVADA JUDGES is not a legitimate news media
4 organization, but more so an over glorified blog and judge tracking site.

5 3. Defendant also moves this court to order FALCONI, alleged
6 administrator of OUR NEVADA JUDGES, to present credentials of the
7 organization, as it has no filing status with the Nevada Secretary of State.

8 4. As it is Defendant, Plaintiff, the minor child, and others called as
9 witnesses fundamental rights to privacy at stake in this matter, Defendant
10 requests this Court apply the **POLICY of SRCR Rule 1, subsection 3**
11 wherein it states, “All court records in civil actions are available to the
12 public, except as otherwise provided in these rules or by statute.”

13 (Emphasis added)

14 5. Defendant further implores the court to recognize the **SCOPE of SRCR**
15 **Rule 1, subsection 4** wherein it states, “... These rules do not apply to
16 the sealing or redacting of court records under specific statutes...
17 domestic relations matters pursuant to... NRS Chapters 122 (Marriage),
18 123 (Rights of Husband and Wife), 125 (Dissolution), 126 (Parentage)
19 127 (Adoption)...

20 (Emphasis added)

21 6. Defendant argues that NRS 125C, of which this court substantially relies
22 upon for it’s jurisdiction on this case, falls under the “domestic relations
23 matters” qualifier, and under NRS 125, where such sealing and redacting
24 rules in SRCR shall not apply.

25 7. Finally, Defendant asks this court to examine the validity of FALCONI’S
26 misapplication of the law.
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3 This Motion is based upon all the records and files in this action, Points and
4 Authorities, Declaration of Defendant, and any argument adduced at the time of
5 hearing of this Motion.

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7 Dated this 9th day of May, 2022

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13 Defendant in Proper
Person

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15 **I. LEGAL ISSUE PRESENTED—**

16 Legal Issue Presented: May non-parties—such as Alexander Falconi—file
17 motions and oppositions into this case? As a matter of law, Defendant asserts he
18 DOES NOT have such legal footing to do so.

19 Rule-of-Law: Under Rule 11, every pleading, “must be signed by at least
20 one attorney of record ... or, by a party personally if the party is unrepresented,”
21 [NRCP, Rule 11(a); underscores added].

22 Legal Analysis: Alexander Falconi’s motions have no signature from any
23 “party”—and no signature from any “attorney-of-record”—a clear Rule 11
24 violation. Therefore, the motion briefs should be deemed “unsigned,” and the
25 Court “*must*” strike them for non-compliance with Rule 11(a).

26 The Opposition “Must” Be Stricken: Here, there is no latitude for the Court
27 to exercise discretion. Rule 11 is clear and unambiguous—“The Court must strike
28 an unsigned paper,” [NRCP, Rule 11(a); (underscores added)].

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2 **II. ORDER TO SHOW CAUSE—**

3 Abuse of Process: Alexander Falconi must be held liable for “abuse of
4 process.” Falconi has actual knowledge that he is *not* an attorney—and *not* a party.
5 Naturally, Falconi has flawed explanations and misapplication as to the legal basis
6 that supposedly allows non-party filings. Based on this, the Court may infer that
7 Falconi intentionally misuses these legal proceedings. Monetary sanctions are
8 appropriate.

9 O.S.C. re Sanctions: The Court is wise to set an O.S.C. re monetary
10 sanctions. Defendant has no time to waste—opposing frivolous motions from non-
11 party interlopers. The Court should order Alexander Falconi to pay sanctions for
12 wasting Defendant’s time in preparing the instant motion to strike. Falconi
13 violates Rule 11(a), which serves only to “needlessly increase the cost of
14 litigation,” [NRCP, Rule 11(b)(1)].

15 Falconi Must Appear and Testify: Alexander Falconi’s putative motions
16 challenges Defendant’s oppositions with “disputed facts,” which means the Court
17 may properly order Falconi to appear and to submit to able cross-examination by
18 Defendant, [*see* EDCR, Rule 2.21, “[T]he court may set the matter for a hearing
19 at a time in the future and require or allow oral examination of the
20 affiants/declarants to resolve factual issues shown by the affidavits/declarations to
21 be in dispute.”].

22 Defendant Cannot Make a Sanctions Motion: Notably, Defendant cannot
23 make a Rule 11 sanctions motion against Falconi. Why?—because Falconi is
24 neither an attorney, nor a party, and therefore, Rule 11 “certification” requirements
25 do not apply. Is it fair that Falconi can have his cake and eat it too?

26 Rule 11—No Application to Non-Parties: The Code provides that, by
27 presenting papers to the court, “an attorney or unrepresented party certifies” the
28 wholesomeness of the pleadings, [*see* Rule 11(b)]. However, as a non-party, it’s

1 legally impossible for Falconi to make Rule 11 certifications, which means Falconi
2 can never incur Rule 11 liability for his frivolous legal maneuvers—and this is
3 unfair to Defendant who wishes to hold Falconi liable for wasting everybody’s
4 time.

5 The Court Must Strike Falconi’s Motions: Once again, the Court must strike
6 Falconi’s motion. Rule 11 provides: “The Court must strike an unsigned paper,”
7 [NRCP, Rule 11(a); (underscores added)].

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9 **III. MOTION TO STRIKE—**

10 Defendant’s Motion to Strike: “The court may strike from a pleading an
11 insufficient defense or any redundant, immaterial, impertinent, or scandalous
12 matter, [NRCP, Rule 12(f).(2); (underscore added)]. Defendant contends that
13 Falconi’s unsigned motions are “immaterial” within the meaning of NRCP, Rule
14 12(f).(2).

15 Alexander Falconi—No Appearance Fee: According to court records,
16 Falconi paid no appearance fee. If Falconi wishes to participate, he must pay a
17 first appearance fee—just like everybody else.

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19 **IV. SUMMARY & CONCLUSION—**

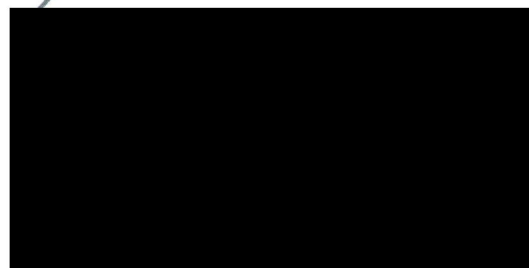
20 Unsigned Papers—Must Be Stricken: Falconi’s motion briefs must be
21 stricken, as per Rule 11— “The Court must strike an unsigned paper,” [NRCP,
22 Rule 11(a); (underscores added)].

23 O.S.C. Monetary Sanctions: The Court should issue an O.S.C. requiring
24 Falconi to explain why monetary sanctions should not be issued. Falconi violates
25 Rule 11(a)—which serves only to “needlessly increase the cost of litigation,”
26 [NRCP, Rule 11(b)(1)].

1 Disputed Facts: Falconi disputes Defendant’s material facts, and *vice-versa*;
2 therefore, because the parties present “disputed facts,” the Court may properly
3 order cross-examination, [*see* EDCR, Rule 2.21].

4 Conclusion: This Court must strike Falconi’s motions and rescind any
5 media order issued. This Court must DENY media access to Falconi.

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8 Dated this 9th day of May, 2022



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13 Defendant in Proper
14 Person

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17 DECLARATION OF [REDACTED]

18 STATE OF NEVADA }
19 COUNTY OF CLARK } ss.

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21 I, [REDACTED] being first duly sworn, depose and say:

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23 1. That I am Defendant in Proper Person in this matter and everything in my
24 Motion is true and correct.
25 2. That I petition this court to re-examine the Order dated March 27, 2022
26 so as to Vacate, pursuant to the facts and matters of law contained herein.
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- 1 3. That Alexander Falconi be denied access to ALL private domestic
2 relations matters under seal, and specifically this case, and be ordered to
3 cease and desist from any further interference with non-conforming
4 filings in this matter.
- 5 4. That this court Strike ALL motions illegally filed by Alexander Falconi,
6 and issue an Order to Show Cause for his legal abuse in this matter.

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8 Pursuant to NRS 53.045, I declare under penalty of perjury under the laws of the
9 State of Nevada that the foregoing is true and correct.
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12 Dated this 9th day of May, 2022
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