

Case No: 27 CV- WR1-2025-0198

Pursuant to NRS 239B.030, the undersigned affirms that the document does not contain social security numbers.

IN THE ELEVENTH JUDICIAL DISTRICT COURT OF THE
STATE OF NEVADA IN AND FOR COUNTY OF PERSHING

JOHNNY E. McMAHON,
Petitioner,

VS.

THE STATE OF NEVADA, et al.
Respondents.

REQUEST FOR SUBMISSION OF MOTIONS

It is requested that the following Motions entitled:

- (1). Motion for Bail Release Pending Appeal in District Court Pursuant to §3143 and Fed. R. App. P. 9(b) filed 08-14-2025, be Adjudicated and Granted prior to the scheduled hearing date of Febr. 09, 2026 based solely on the fact that the State Respondents do not possess subject-matter jurisdiction over the case, or Mr McMahon's person pursuant to NRS 173.035 which renders the case as a void judgment as a matter of law and fully exonerates Mr. McMahon;
- (2). Motion for Evidentiary Hearing and Order For Clerk to Unseal Record and Produce Arrest Warrant of 2005 for McMahon

and any Record of Court Minutes of a Probable Cause hearing between Dec 12-15, 2005, Filed, 08-14-2025. Based upon the fact that a valid arrest warrant was never issued, or in place for Mr McMahon's arrest, as such the degree of lies and fraud upon the court by State Respondents in the past 18 years to engage in obstruction of justice, criminal forgery of the signature of a sitting judge on a legal document and RICO Act Violations, simply to secure a criminal conviction of a manufactured sex case, knowing full well the Clerk of the Eighth Judicial District Court, at no time possessed a valid arrest warrant on record. The State Respondents went above and beyond the scope of their official capacity to even seal/redact the record as the State Respondents plan, scheme and design was to keep Mr McMahon falsely imprisoned for life to keep JEMs from reconstructing Flying Saucer Entertainment and the Rapid Transit System to have exclusivity of over 500,000 guests per month flying into Harry Reid International Airport constructively destroying the surrounding hotel casinos bottom line. Wherefore, for the sake of judicial efficiency this Motion should be adjudicated prior to the scheduled hearing date of Febr. 09, 2026.

(3). Motion for Judgment by Default against State Respondents for Failure to Respond to Courts Order of July 24, 2026 Pursuant to Fed.R. Civ. P. 55, Filed 09-23-2025 be adjudicated prior to the scheduled hearing date of Febr. 09, 2026, as the State Respondents have no legal standing to begin with and a default judgment renders the instant case as null and void.

(4). Motion to Compel Court to Order State Respondents to Cease and Desist any Further Attempt from filing out-dated Responses to Petitioner's Motion for Judgment by Default, Filed 11-03-2025, as the State Respondents possesses no legal standing to participate in the instant case, as such this Motion should also be adjudicated prior to the scheduled hearing date of Febr. 09, 2026;

(5). Petitioner's Request and Order to Transport Petitioner to Scheduled Motion Hearing, Dated Febr. 09, 2026 at 2:00 P.M. This motion is necessary for Petitioner to be Transported to Scheduled Hearing, Sent to Clerk of Court on Nov. 22, 2025, to appear in person, as movant party petitioner to make a record for appellate review at the scheduled hearing date of Febr. 09, 2026 at 2:00 P.M.;

(6). Petitioner's Request for Admissions Pursuant to Fed. R. Civ. P. Rule 36 and Hearing Requested with Petitioner's Present, mailed Jan. 2026, be adjudicated prior to the scheduled hearing date of Febr. 09, 2026, as the Clerk of the Eighth Judicial Dist. Court at no time possessed a valid arrest warrant of 2005 for McMahon, this ruse on behalf of the Clark County Dist. Attorney's Office was instituted to overcome the proper re-filing of the case in a timely manner pursuant to NRS 173.035, which again, absent a valid warrant the case constitutes as a void judgment as held by the Nevada Supreme Courts law of the case on all 4's with the instant case,

(7). Petitioner's Motion for Court to Order State Respondents to Produce States Exhibits #32-33, to have DNA Evidence Forensically Analyzed Pursuant to NRS 176.0918(3)(c) to Determine Probative Value, mailed Jan. 2026, this evidence was central to the jury verdict and was intentionally designed by vindictive prosecutors to hoodwink the court and mislead the jury of the true evidence, using States Expert, R.D., from Utah Crime Lab, to claim the commingled DNA evidence on Mr McMahon's bedding was 1-38,000 against the defendant for tearing witness accuser, E.H.'s, hymenal blood sac during the initial sex act in June, 2004, when the said evidence used to convict was confiscated by LVMPD in Oct, 2004, the States fraudulent concealment of exculpatory DNA evidence of E.H.'s voluntary statement of Oct. 2005, claiming that she had a menstrual period discharge, on States Exhibits #32-33, which was intentionally withheld by State prosecutors, from court and jury, which now warrants Court to Order the DNA evidence to be forensically analyzed to eliminate Mr. McMahon of any involvement in a sex act with E.H., and again, to prove State Respondents' desperate use of evidence to secure a conviction against Mr McMahon and fraud upon the court. For the sake of judicial efficiency, having the States evidence examined, against the prima facie evidence on file, would only prove that the Clark County District Attorney's Office has no intentions of playing fair by the rules, as again, their objective from the outset was to secure a conviction of Mr McMahon using any means necessary as no court or the Nevada State Bar Assn. is going to hold any DDA or DA accountable for violating the law as the agency is being protected; and

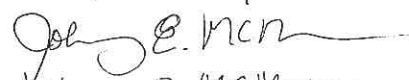
(8). Petitioner's Motion for Court to Declare the Petitioner's Post-Conviction First-Direct Appeal as Constitutionally Null and Void under the Fifth and Fourteenth Amendments, mailed on day of January, 2026. Eighth Judicial District Court, Judge, David Barker, intentionally forced legally retained/discharged trial attorney, Paul Wommer, back onto the instant case creating a clear conflict of interest. The court was put on notice, both at sentencing, and in timely filed pro se motions, for the court to stay the case and withdraw Wommer as counsel, enabling Mr McMahon to retain new counsel to prosecute the First-direct appeal of right. No court, including this reviewing court, has ever engaged in such a constitutional structural error, to violate the 6th Amendment rights of a defendant and an appellate court ruled that such error was proper and legal. Denying Mr McMahon of his rights to a procedurally full and fair First-direct appeal not only invalidates any AEDPA provisions as a State defense, it warrants this court to declare the Post-Conviction First-Direct Appeal as Null and Void as a matter of law.

Accordingly, the foregoing Motions are necessary for this Court to adjudicate prior to the scheduled hearing date of Febr. 09, 2026 at 2:00 P.M. for the sake of the justice owed to the case and to Mr. McMahon.

IT IS SO PRAYED.

Dated: day of January, 2026

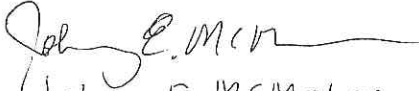
Respectfully submitted,


Johnny E. McMahon
Pro se

VERIFICATION / AFFIRMATION NRS 239B.030

Mr McMahon declares under penalty of perjury that the following and foregoing statements, evidence and pleading is true and accurate to the best of his ability and possesses first-hand knowledge of the truth and accuracy of the events and that no documents contain the social security number of anyone.

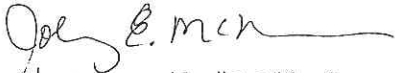
Dated: day of January, 2026.


Johnny E. McMahon

CERTIFICATE OF SERVICE

Mr McMahon declares that a true and correct copy of Request for Submission of Motions, was placed in U.S. mail postage prepaid on day of January, 2026 to:

Aaron Ford
Attorney General
State of Nevada
100 N. Carson St.
Carson City, NV 89701


Johnny E. McMahon
Pro se