

1 JEREMY BRYSON #1084207  
 2 H.D.S.P.  
 3 P.O. BOX 650  
 4 Indian Springs, NV 89070


5  
 6 United States District Court  
 7 District of Nevada  
 8

9 10 11	Jeremy Bryson Plaintiff	Case No# 2:20-cv-00089 JAD BNW
12 13 14	-vs- Zuniga, et al Defendants	Motion For AN ORDER Compelling Discovery

15  
 16 Plaintiffs move this court for an order pursuant to  
 17 Rule 34(a) of the Federal Rules of Civil Procedure  
 18 compelling Defendants Yo Zuniga, Brian Williams,  
 19 James Dzuvenda to produce for inspection and  
 20 copying the following documents [Listed in Exhibit  
 21 #1] that were sent to the Attorney General's  
 22 office on 5/08/2021 - Document Number 21  
 23 of Bryson vs- Zuniga will show Proof of Service,  
 24 and Court Minutes of Magistrate Acknowledging  
 25 the document Request's. Plaintiff submitted  
 26 written Requests Pursuant to Rule 34 on 5/8/2021  
 27 but have NOT YET RECIEVED the documents  
 28

Continued

1 Plaintiff also moves for an order pursuant to Rule  
 2 37(a)(4) requiring the aforesaid Defendants to  
 3 pay Plaintiff the sum of \$2,000 dollars as  
 4 reasonable expenses in obtaining this order, on  
 5 the ground that Defendants' refusal to answer the  
 6 document request, or produce the documents had  
 7 no substantial justification

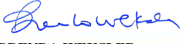
8  
 9 Dated: 8/31/2021 And declared under penalty  
 10 of perjury signed  1084207  
 11 JEREMY BRYSON  
 12 Plaintiff in Pro Se

13  
 14 H.D.S.P.  
 15 P.O. BOX 6050  
 16 Indian Springs NV 89070

**Order**

17  
 18 IT IS ORDERED that ECF No. 26 is DENIED without prejudice. Plaintiff  
 19 must meet and confer with Defendants under Local Rule IA 1-3(f)  
 20 before filing a motion to compel. Additionally, a "party who files a motion  
 21 to which the meet-and-confer requirement applies must submit a  
 22 declaration stating all meet-and-confer efforts, including the time, place,  
 23 manner, and participants. The movant must certify that, despite a  
 24 sincere effort to resolve or narrow the dispute during the meet-and-  
 25 confer conference, the parties were unable to resolve or narrow the  
 26 dispute without court intervention." LR IA 1-3(f)(2). If Plaintiff meets and  
 27 confers with Defendants and refiles his motion, he must also tell the  
 28 Court, specifically, which discovery requests he is moving to compel  
 responses to and why the Defendants' responses are improper.

IT IS SO ORDERED  
 DATED: 12:44 pm, September 03, 2021

  
 BRENDA WEKSLER  
 UNITED STATES MAGISTRATE JUDGE

**HDSP\_LawLibrary - Activity in Case 2:20-cv-00089-JAD-BNW Bryson v. Zuniga et al Minute Order**

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**From:** <cmechf@nvd.uscourts.gov>  
**To:** <cmechfhelpdesk@nvd.uscourts.gov>  
**Date:** 5/10/2021 2:59 PM  
**Subject:** Activity in Case 2:20-cv-00089-JAD-BNW Bryson v. Zuniga et al Minute Order

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This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

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**United States District Court**

**District of Nevada**

**Notice of Electronic Filing**

The following transaction was entered on 5/10/2021 at 2:58 PM PDT and filed on 5/10/2021

**Case Name:** Bryson v. Zuniga et al  
**Case Number:** 2:20-cv-00089-JAD-BNW  
**Filer:**  
**Document Number:** 21

**Docket Text:**

**MINUTE ORDER IN CHAMBERS** of the Honorable Magistrate Judge Brenda Weksler on 5/10/2021. Re: Discovery documents returned. (Attachments: # (1) Discovery Documents)(Copies have been distributed pursuant to the NEF - DRM)

**2:20-cv-00089-JAD-BNW Notice has been electronically mailed to:**

Henry Kim hkim@ag.nv.gov, cknigh@ag.nv.gov, cmackerl@ag.nv.gov, mpizzariello@ag.nv.gov, sregalado@ag.nv.gov

HDSP Law Library HDSP\_LawLibrary@doc.nv.gov

**2:20-cv-00089-JAD-BNW Notice has been delivered by other means to:**

The following document(s) are associated with this transaction:

**Document description:**Main Document

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

JEREMY BRYSON

Plaintiff,

v.

ZUNIGA, et al.

Defendants.

Case No. 2:20-cv-00089-JAD-BNW

**MINUTES OF THE COURT**

Date: May 10, 2021

PRESENT: THE HONORABLE BRENDA WEKSLER, U.S. MAGISTRATE JUDGE

Deputy Clerk: D.R. Morgan Reporter: NONE APPEARING

Counsel for Plaintiff: NONE APPEARING Counsel for Defendant: NONE APPEARING

MINUTE ORDER IN CHAMBERS:

[X] **DISCOVERY DOCUMENTS:** Unless the court orders otherwise, written discovery, including discovery requests, discovery responses, deposition notices, and deposition transcripts, must not be filed with the court. Your documents are returned herewith. See Local Rule 26-8.

**IT IS SO ORDERED.**

DEBRA K. KEMPI, CLERK

By: /s/  
Deputy Clerk

Certificate of Service By Mailing

I, JEREMY BRYSON, hereby certify, pursuant to NRCPS(b), that on this day the 7<sup>th</sup> of May, 2021 I mailed a true and correct copy of the foregoing "Request of Documents" to the defendants Zuniga, Brian Williams, James Dzuronda, ... To the Attorney Generals office by depositing it in the High Desert State Prison mail box, fully prepaid, addressed as follows

OFFICE of The Attorney General  
ATTN: Henry H. Kim  
555 E. Washington Ave., Ste. 3900  
Las Vegas, NV 89101

cc. file

Dated: this 7<sup>th</sup> day of May, 2021


  
JEREMY BRYSON # 1084207  
plaintiff / in propria personam  
Post office box 650 [ADSP]  
Indian Springs, Nevada 89018

EXHIBIT # 1

Page 1

1 JEREMY BRYSON #1084207  
2 H.I.D.S.P.  
3 P.O. BOX 650  
4 Indian Springs, NV 89070  
5

6 United States District Court  
7 District of NEVADA  
8

9 JEREMY BRYSON  
10 Plaintiff  
11  
12 -vs-  
13 Zuniga, et al  
14 Defendants

CASE NO #  
2:20-cv-00089 JAD BNW

\* Document REQUEST DIRECTED  
to: Zuniga, Brian Williams, James  
Dzurenda

16 In accordance with Fed.R.CIV.P. Rule 34, Plaintiff  
17 Requests defendant produce the documents listed herein  
18 within 30 days, either by making copies and forwarding the same  
19 to plaintiff, or by making the requested documents available for  
20 Plaintiff's inspection, In accordance with Fed.R.CIV.P Rule 26  
21 Rule 26 Permits the discovery of Matters "Relevant to the  
22 subject matter involved in the pending action." It is not grounds  
23 for objection that the information sought will be inadmissible at the  
24 trial if the information sought appears reasonably calculated to  
25 Lead to the discovery of admissible evidence. For the purposes  
26 of discovery relevance is construed "Broadly to encompass any  
27 matter that bears upon, or that could bear upon  
28

1 information which could reasonably lead to other  
 2 matters that could bear on any issue that is or may be  
 3 in the case. Fund Inc. v. Sanders 437 U.S. 340 @ 351 [1978]  
 4 Failure to timely object within (30) days of this Request  
 5 constitutes a waiver of objections. In accordance with  
 6 the Fed. R. Ev. rule 404(b) evidence of other crimes, wrongs  
 7 or acts --- is admissible to prove motive, opportunity,  
 8 intent, preparation, Plan, knowledge, Identity, or  
 9 absence of Mistake. "Document" means written or graphic matter  
 10 of every kind or description, however produced, reproduced,  
 11 whether in draft, final, or reproduction, not limited to, but  
 12 including, written communications, Letter, correspondence, memorandums,  
 13 notes, Bulletin, Directive, meeting notes, Records of any kind,  
 14 photographs, Audio Recording, contracts, agreements, operating  
 15 procedures, Regulations, telephone records, meta-DATA, diaries,  
 16 desk calendars, NOTIS Records, statements, Reports, computer  
 17 records, emails, statistical Abstracts, or any other hard copy  
 18 or electronic information. Failure to timely respond to this  
 19 Document request may subject you to Court sanctions which  
 20 may include monetary and other types of Adverse sanctions against  
 21 you PER Fed. R. Civ. P. Rule 37. Please Identify any and  
 22 ALL Documents Being withheld, for any reason, and explain  
 23 why this document is being withheld. Any term that is Ambiguous,  
 24 then define the term for your self, then answer the  
 25 question or request and include your definition so ascribed.  
 26 THE Following Pages list requested "documents" relevant  
 27 to this pending Case "All requests include any and All forms.  
 28



## Documents REQUESTED Continued

of descriptive "document" matter listed in document description on page # 2

### "Documents"

- 1] Any and all information, knowledge, plan, document, file; that has any information about plaintiff being an inmate at (N.D.O.C.) Nevada Department of Corrections.
- 2] Any and All information, known about Plaintiffs injuries, health, safety, or incarcerated situations or investigative info of plaintiff; being that plaintiff is in a Penal Custody relation while in Custody at (N.D.O.C.)
- 3] Any and All known info, documents, files, Identity, or recordings of (PC) protective Custody Inmates being placed in the very front row, of the transport vehicle, while being transported in the same vehicle with (GP) general population inmates sitting in all of the rows behind the (PC) inmates "who were on the very front row."
- 4] Any known information of (N.D.O.C.) staff, or employee, of (N.D.O.C.) or (H.D.S.P.) High Desert State Prison, who caused a dangerous situation to the safety of a (PC) inmate by deliberate indifference to the protective policies, and operating procedures put in place, and created to protect (PC) inmates due to their keep

Document Request Continued.

separate needs; to remain safe from (GP) inmates, who will try to harm them.

5] Any known information of Any time in the History of (NDOC) that the U.S. Courts have sanctioned (NDOC) for violating the Rights of an individual in their care.

6] Any known information of Plaintiff being forced to transport with the defendant in question % Zuniga, after the High Desert State Prison, and (NDOC) were made aware of this pending action, and the Plaintiff's fear for his safety.

7] Any known documents, or information, of the plaintiff's cooperation with the (IG) inspector general's office concerning the murder/homicide of Ralph Goodman at (H.D.S.P) High Desert State Prison, or death of Ralph Goodman; And Any known REASON that Plaintiff came to be an (PC) inmate the day of his death. This ~~now~~ includes all documents, files, of Plaintiff's cooperation with (IG) and therefore his (safety) being put in danger.

8] Any known EVIDENCE of Plaintiff's [safety] being in danger by any planned attack of (GP) gang members OR (GP) inmates, or affiliated prisoners seeking retaliation

Document Requested Continued

9] Any known information, document, of (PC) inmates being injured, or assaulted by policies, practices, or procedures [NOT] being correctly followed; or disregard for following proper procedures by (N.DOC) staff, or employees of (N.DOC.)

10] Any or ALL known information, documents, records of (OP) operating procedures; And/or (AR) administrative regulations, That have changed in any way since [June 25<sup>th</sup>, 2019] due to decisions made to improve the previous (OP) or (AR), finding fault in (OP) or (AR), or procedural deficiencies. This includes, but not limited to: transfers of inmates to court, segregation, protective custody and. Any changes in policies, and practices of any procedure made to improve function after June 25<sup>th</sup> 2019.


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6 United States District Court  
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9 JEREMY BRYSON  
10 Plaintiff  
11  
12 vs-  
13 Zuniga, et al  
14 Defendants

Case NO<sup>#</sup> 2:20-cv-00089 JADBNW  
Motion Asking LEAVE for  
Extension of Discovery  
Deadline

15  
16 Plaintiff asks the Court to extend the October  
17 deadline of the Discovery Order due to the  
18 Plaintiff is being Released from Prison on November  
19 15<sup>th</sup>/2021, Plaintiff is without Counsel, and will  
20 need to refile with the Court's, and Plaintiff will  
21 need to obtain further Medical Records, Videos, and  
22 documents that can be obtained once Released.

23  
24 Dated: 8/31/2021  
25 Under penalty of Perjury By:  1084207  
26 JEREMY BRYSON  
27 Plaintiff in Pro se