

1 Robert Scotlund Vaile
2 PO Box 727
3 Kenwood, CA 95452
4 (707) 833-2350
5 *Petitioner in Proper Person*

FILED

FEB 17 2010

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY A. Angers
DEPUTY CLERK

6 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

7 ROBERT SCOTLUND VAILE,

8
9 Petitioner,

Supreme Court Case No: 55446

District Court Case No: 98D230385

10
11 vs.

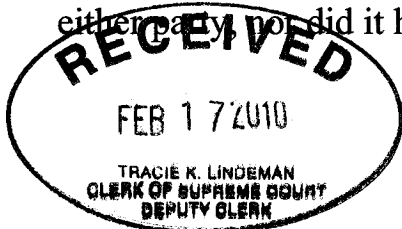
12 THE EIGHTH JUDICIAL DISTRICT
13 COURT OF THE STATE OF
14 NEVADA, IN AND FOR THE
15 COUNTY OF CLARK, AND THE
16 HONORABLE CHERYL B. MOSS,
17 DISTRICT JUDGE, FAMILY COURT
18 DIVISION,

19
20 Respondents.

21 **PETITION FOR WRIT OF MANDAMUS OR PROHIBITION**

22
23 **I. STATEMENT OF THE FACTS:**

- 24
25 1. In April, 2002, this Court issued a decision in response to Defendant
26 Porsboll's arguments that the district court lacked jurisdiction in this case.
27 This Court held that "the district court did not have personal jurisdiction over
28 either party, nor did it have subject matter jurisdiction over the marital status



1 of the parties when it entered the decree,” and furthermore that “[a]s neither
2 the children nor the parents have ever lived here or have a significant
3 relationship with Nevada, virtually no information is available in this state to
4 even arguably create jurisdiction” *Vaile v. Eighth Judicial Dist. Court*,
5 118 Nev. 262, 268, 275 (Nev. 2002).

- 6 2. On April 29, 2002, Defendant Porsboll's counsel, the Willick Law Group
7 (“Willick”) filed a *Motion to Amend Decision of April 11, 2002 and Petition*
8 *for Rehearing* in this Court, requesting amendment of the decision, and for an
9 order for attorney's fees on appeal. In that motion, Willick claimed that
10 “[o]nly this Court can make an award of attorney's fees for the appellate
11 proceedings,” and asserted that he was owed over \$35,000 in attorney's fees
12 at that time.
- 13 3. This Court denied Willick's motion, presumably based on jurisdictional
14 holdings that the Nevada courts had neither personal nor subject matter
15 jurisdiction of the parties.
- 16 4. Undeterred by the decision of this Court, Willick returned to the family court
17 and requested that the case (which had been transferred to Honorable Cheryl
18 B. Moss while the case was on appeal) be reopened and that the court order
19 attorney's fees denied by this Court - but this time to the tune of **\$116,732.09!**
20 Despite this Court's holding that the lower court lacked jurisdiction, the
21 family court entered an order filed on July 24, 2003, awarding the attorney
22 fees effective as of June 4, 2003. See Exhibit A.
- 23 5. Despite knowing Mr. Vaile's out-of-state addresses since the issuance of the
24 order, Willick has neither registered nor attempted enforcement of the fee
25 order in any state where Mr. Vaile has lived.
- 26 6. On June 16, 2009 however, citing the 2003 award of attorney's fees as its
27 only basis, Willick issued a Nevada writ of execution and garnishment to a
28

1 Nevada branch of Mr. Vaile's California employer, Deloitte & Touche LLP
2 ("Deloitte"), in an attempt to seize Mr. Vaile's *California* earnings.

3 7. Without objection by Mr. Vaile, Deloitte & Touche, LLP had been
4 garnishing Mr. Vaile's salary in California for child support and arrears since
5 the family court entered retroactive child support orders in March 2008.

6 8. However, a California court issued a TRO prohibiting Deloitte from
7 garnishing Mr. Vaile's earnings based on the writ of garnishment because
8 that Nevada judgment had not been domesticated in California. It also
9 ordered that Porsboll and Willick be served in that action.

10 9. Had Porsboll's counsel attempted registration of the fee order in California
11 and initiated garnishment proceedings there, it would have been made known
12 to the court that the Nevada judgment had expired before it was served on
13 Deloitte.

14 10. In response to the California action, Willick filed a motion in the Nevada
15 family court demanding that the Nevada family court order dismissal of the
16 California action. Willick also requested an order for Mr. Vaile to show
17 cause why Deloitte should not be held in contempt of court for not garnishing
18 Mr. Vaile's salary in California. Finally, Willick requested an order
19 mandating that Mr. Vaile make direct money payments to his firm in
20 fulfillment of the 2003 attorney fee award on threat of criminal contempt.

21 11. At a hearing addressing Willick's motions on October 26, 2009, Mr. Vaile
22 provided testimony to the family court below that the 2003 judgment had
23 expired and had not been renewed, and also demonstrated that according to
24 Nevada law, judgments were to be enforced by execution, not mandatory
25 payments under threat of contempt.

26 12. At the hearing, Willick provided no evidence (neither proof of notice nor of
27 recording) that the 2003 judgment had been renewed, other than his
28 assurances that he had renewed it.

1 13. With no evidence presented in support of the finding, the family court found
2 that the order **had been** properly renewed. See Exhibit B, ¶ 11. The court
3 also held that although NRS 31.294 required the family court to stay the case
4 pending the outcome in California, that stay would only be applied to
5 Deloitte, and not to Mr. Vaile or the case as a whole. See Exhibit B, ¶ 6.

6 14. The court also held that since Deloitte was restrained from garnishing Mr.
7 Vaile's salary, Mr. Vaile would be ordered to "self-garnish," and to
8 interplead 25% of his salary to the clerk of the court in payment of the 2003
9 attorney fee award or face criminal contempt. See Exhibit B, ¶ 7. The court
10 provided assurances to Defendant's counsel that they would receive these
11 funds and ordered a status check hearing on February 3, 2009.

12 15. Shortly after the Nevada hearing in October, Porsboll's California counsel
13 admitted in filings to the California court that the 2003 Nevada judgment had
14 not, in fact, been renewed. California counsel also made assurances to that
15 court and to Mr. Vaile directly that the Nevada garnishment would not be
16 pursued.

17 16. These assurances put Mr. Vaile on notice that he need not file bankruptcy or
18 attempt to interplead funds to the family court in satisfaction of the expired
19 2003 judgment (the order had not yet been signed). Mr. Vaile assumed that
20 Willick, as an officer of the court, would make known and correct the
21 material misstatements of fact to the family court.

22 17. Instead, Willick submitted a proposed order to the Nevada family court
23 which contained the finding that there was no deficiency in the renewal of
24 the 2003 order (a fact they knew to be untrue) and which ordered Mr. Vaile
25 to interplead his salary, despite Porsboll's admissions and assurances to the
26 contrary in California. See Exhibit B, ¶ 11.

27 18. The family court signed the order proposed by Willick which was filed on
28 December 22, 2009. See Exhibit B.

1 19. Since Mr. Vaile had, since June 11, 2008, been prohibited by the family court
2 of filing motions in proper person without the family court and Willick pre-
3 approving the motion first, Mr. Vaile submitted a motion to the court's
4 chambers requesting that the order be vacated.

5 20. The status check hearing in the family court was held on February 3, 2010.
6 Deloitte's attorney appeared and submitted a stipulation and order quashing
7 the Writ of Garnishment because of the revelation (in California) that the
8 2003 judgment had not been renewed.

9 21. Willick stipulated and the court signed the order in open court. See Exhibit
10 C.

11 22. Despite the fact that Willick had misrepresented the truth regarding the 2003
12 judgment's renewal to the family court in the previous October hearing,
13 Willick actually demanded that the family court hold Mr. Vaile in contempt
14 of court for failing to deliver 25% of his salary to the clerk of court in
15 satisfaction of the expired 2003 judgment.

16 23. Unbelievably, the family court scheduled a show cause hearing for March 8,
17 2010 for Mr. Vaile to show why he should not be held in contempt of court
18 for not self-garnishing his salary and interpleading those funds to the clerk of
19 court in satisfaction of the expired order.¹ See Exhibit D,² ¶ 3.

20 24. The court ordered Mr. Vaile to pay \$4,696.64 by March 8, 2010 or face
21 criminal contempt sanctions. It also ordered Mr. Vaile to continue to pay
22 25% of his salary into the court prospectively even though the writ of
23 garnishment was quashed! See Exhibit D, ¶ 3.

24 ¹ Mr. Vaile specifically asked: "I was to interplead as a substitution for the garnishment.
25 The writ of garnishment has just been quashed. On what basis am I to interplead funds?"
26 No answer was provided. Video transcript at 14h:59m:42s. The court's only answer: "My
27 order is valid. It's enforceable." Video transcript at 15h:03m:48s. See Exhibit E.

28 ² This is a copy of the proposed order provided by Porsboll's counsel. According to
Petitioner's knowledge, this order has not yet been signed by the judge. Since this
proposed order was produced by Porsboll's counsel, it demonstrates that Petitioner has
accurately portrayed the holdings of the lower court.

1 25. The family court went so far as to encourage Porsboll's counsel to provide a
2 basis for the lower court to withhold the funds before the next hearing
3 scheduled for March 8, 2010:

4 Court to Porsboll's counsel: "I want to make sure that as part of your
5 argument, that you believe there is – well probably sounds archaic but – you
6 need to argue the court's authority to do what you are asking"

7 Porsboll's counsel: "Oh we've got that nailed your honor. There's no
8 problem with that one."

9 Court: "Make sure."

10 Video transcript at 15h:14m:30s.

11 26. The family court also told Porsboll's counsel what to argue.

12 Court to Porsboll's counsel: "Well part of your argument also is that you have
13 exhausted by any collectable means."

14 Porsboll's counsel: "Yes, your honor."

15 Court: "Collectable by any lawful means - has it all been – that's your
16 argument, that it's been exhausted."

17 Video transcript at 15h:15m:31s.

18 27. With the prospect that Willick could, through this particular family court's
19 contempt power, enforce payment of money on threat of incarceration,
20 Willick recently asked the family court to register a default judgment from
21 the federal court in Las Vegas as a foreign judgment with the intent that the
22 family court demand collection from Mr. Vaile in the same manner.

23
24 * * *

25 * *

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1 When a court of this state acts outside the bounds of the law, this Court may
2 act to prohibit the conduct, or mandate that the law be followed. See Round Hill
3 Gen. Imp. Dist. v. Newman, 97 Nev. 601, 637 P.2d 534 (1981). Petitioner
4 requests just such a relief here.

5 **2. MAY A COURT ORDER A PARTY TO PAY A MONEY JUDGMENT FOR**
6 **ATTORNEY'S FEES UNDER THREAT OF IMPRISONMENT?**
7

8 **ANSWER: No.**

9 NRS 21.050 states that “[w]here a judgment requires the payment of money
10 or the delivery of real or personal property, the same shall be enforced in those
11 respects *by execution*.” The statute continues by providing the detailed steps a
12 judgment creditor must follow in order to execute on a judgment. By limiting
13 enforcement of money judgments to execution, this statute effectively eliminated
14 debtors' prisons in Nevada; a creditor may execute judgment against a debtor's
15 property, but not persecute him or have him imprisoned. No other statute
16 provides for enforcement of attorney fee awards, and no statute provides for
17 payment of money judgments for attorney's fees on threat of criminal contempt.

18 Even if the judgment in question had not expired as stipulated by all parties
19 here, a court of this state may not enforce the judgment in a manner not supported
20 by the statute. If a court were authorized to order payment on threat of
21 imprisonment, any creditor who is friendly with a judge could effect the
22 imprisonment of any debtors in the state. The courts of the state would
23 effectively have the power to force debtors into bankruptcy protection in order to
24 avoid imprisonment. Petitioner requests that this Court prevent this abuse of
25 discretion which stays far from the judicial power authorized by Nevada's
26 legislature.
27
28

1 Petitioner provided a financial affidavit to the family court in accordance
2 with its instructions. However, the family court refused to consider Mr. Vaile's
3 ability to pay when it made its retroactive order for child support payments. The
4 resultant order caused Mrs. Vaile to file bankruptcy because of the inability of the
5 family to both meet its outstanding obligations and to pay the retroactive child
6 support and arrearages established by the family court. Mr. Vaile has been
7 paying \$1300 per month plus \$130 in arrearages since the family court entered its
8 order in March 2008 – and Willick has been intercepting 40% of these payments.

9 The lower court further refused to consider Mr. Vaile's ability to pay when it
10 ordered him to pay \$16,000 to purge contempt that the court imposed on Mr.
11 Vaile for not retroactively adhering to the child support modifications made by
12 the court. Because of this order, Mrs. Vaile cashed in the entirety of her teacher
13 retirement benefit in order to pay the contempt judgment issued by lower court.
14 Since then, Mr. Vaile advised the family court that two of Mr. and Mrs. Vaile's
15 three small children have been diagnosed with Cystic Fibrosis, which is causing
16 significant medical expenses and stress on the family. Mr. and Mrs. Vaile have
17 no savings, no liquid assets, and simply do not have the capability to pay the
18 additional funds ordered by the lower court.

19 Completely ignoring Mr. Vaile's financial situation, the family court is, at
20 Willick's insistence, forcing Mr. Vaile to provide money to the court that he does
21 not have the physical capability to provide. The lower court is effectively forcing
22 Mr. Vaile to file bankruptcy before March 8, 2010, or be imprisoned on that date.⁵
23

24 ⁵ Mr. Vaile has previously advised this Court that Willick is intent on settling a declared
25 personal vendetta against Mr. Vaile and is acting in his own interest. Another matter to be
26 heard in the lower court on March 8, 2010 is Willick's request that the lower court issue an
27 advisory opinion reframing a previous order (that has since been amended) by that court in
28 order to help him defend an abuse of process case against him in Virginia (his client,
Porsboll is not a party to the Virginia case). By using this case to further his own will,
Willick has failed to recognize that his client will not be benefited by forcing Mr. Vaile
into imprisonment or bankruptcy, either of which threaten Mr. Vaile's employment and his
ability to provide ongoing payment to Willicks' clients.

1 Mr. Vaile requests that this Court act expeditiously to prevent this manifest
2 injustice.

3 **NECESSITY FOR AN EXTRAORDINARY WRIT**

4 During the hearing on February 3, 2010, the family court made it clear that it
5 was entering orders to which Mr. Vaile must comply by March 8, 2010. In this
6 case, Porsboll's attorneys have previously waited several months before providing
7 notice of entry of an order when they felt that it was in their best interests. It is
8 therefore likely that Porsboll's counsel will not submit the order from the
9 February 3 hearing until after the hearing on March 8, 2010. Either way, Mr.
10 Vaile must comply before March 8. By this date, Mr. Vaile will be forced to
11 either file bankruptcy or be imprisoned because he does not have the capability to
12 pay as ordered by the court. This matter cannot wait for the normal course of
13 appeal.

14 This matter will cause significant consequences for all parties involved.
15 Mr. Vaile's family and his ability to remain gainfully employed is at stake, which
16 will detrimentally effect Porsboll too. Since this issue may not be adequately
17 addressed after the fact on appeal (the damage will be done), it is necessarily the
18 subject of this Court's mandamus power to correct at this stage of the
19 proceedings. Accordingly, Petitioner respectfully requests that this Court act
20 urgently.

21 It must be assumed that the family court knows it is operating outside the
22 confines of the law in these actions. The impartiality and judicial actions in abuse
23 of its discretion by this family court directed at Mr. Vaile, at the prompting of
24 Willick, are not isolated to this event. At Willick's bidding, the court has
25 informed Mr. Vaile that this Courts' rules on telephonic appearances may not be
26 applied to him because Mr. Vaile complained that he could not hear when the
27 telephone system malfunctioned in March 2008. The court has forced him to fly
28

1 from California to Las Vegas half a dozen times to attend hearings each time
2 Willick has filed a new motion. At the February 3, 2010 hearing, the court denied
3 Mr. Vaile's renewed request that this Court's rules on telephonic appearances be
4 applied at future hearings. See Exhibit D, ¶ 1.

5 Upon Willick's insistence, the family court also singled out Mr. Vaile for
6 application of judicially created civil rules of Willick's creation. In what Willick
7 called a "Goat" order, the court prohibited Mr. Vaile from filing any motions in
8 this case without the court and Willick approving them first, regardless of the
9 Nevada rules on point. Not only is this action is unsupported by the legislature, it
10 is wholly unjustified given the fact that Willick filed far more motions in this case
11 than Mr. Vaile, and the fact that all of Mr. Vaile's motions have had merit. See
12 *Order for Hearing Held June 11, 2008*, ¶ 5. Willick has filed five different
13 motions⁶ just since the final orders were entered in this case alone.

14 The family court has denied Mr. Vaile the right to conduct discovery on the
15 issues before the court, has refused to cite the evidence Mr. Vaile presented in
16 hearings, and has found that arguments by Willick outweigh actual evidence
17 presented by Mr. Vaile. The court has made retroactive modifications to the
18 parties' support agreement, held Mr. Vaile in contempt of court for not adhering
19 to the modifications retroactively (an impossibility), but held that it has no further
20 jurisdiction to modify.⁷ The court has granted Willick many tens of thousands of
21 dollars in attorney's fees, and has now expressed its intent to enforce those
22 judgments through its contempt power. Clearly, the court has demonstrated not
23

24 ⁶ The practice by Porsboll's counsel of filing serial motions against Mr. Vaile was the
25 subject of Mr. Vaile's previous request that the lower court be stayed while the case was on
26 appeal.

27 ⁷ The parties oldest child turned 18 nearly a year ago. The court has avoided modifying
28 child support based on this fact by simply stating that it no longer has authority to modify.
See October 9, 2008 order, ¶ 161: "The Nevada Court does not presently have authority to
modify child support because both parents no longer live in the State of Nevada." Of
course, this Court held in 2002 that neither parent or children *ever* lived in Nevada.

1 only a bias in favor of local attorney Willick, but also that she will not let the law
2 stand in her way of giving Willick the legal advantage over an out-of-state
3 disfavored litigant. If ever the mandamus power of this Court was needed to
4 prevent manifest injustice in a Nevada lower court, that extraordinary intervention
5 is needed now.

6
7 **III. REQUESTS FOR RELIEF**

8 The order from the February 3, 2010 hearing has not yet been noticed as to
9 entry. Petitioner will produce for the Court the minutes, signed order and written
10 transcripts as soon as they can be secured. Given that these may not be available
11 until after March 8, 2010, Petitioner respectfully requests based upon the facts
12 and argument presented above, that this Honorable Court issue an order on an
13 emergency basis that includes:

14 1. Staying the proceedings in the lower court until:

15 a) the Court determines the merits of the defenses and jurisdictional
16 challenges pending on appeal;

17 b) the Court obtains the order from the hearing on February 3, 2010
18 and written transcripts of the October 26, 2009 and February 3, 2010
19 hearings; and
20


21 c) the Court can address the issues raised in this Petition;

22 2. Prohibiting the Honorable Cheryl B. Moss from enforcing judgments
23 other than as dictated by the Nevada statutes, namely by execution against
24 the debtor's property within the state of Nevada;

25 3. Mandating that the family court vacate its December 22, 2010 order
26 and any order from the hearing on February 3, 2010; and
27
28

1 4. Mandating that the family court case be reassigned to another family
2 law judge given the apparent inability of the court to exercise unbiased
3 judgment in this action.

4 Respectfully submitted this 16th day of February, 2010.

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8 Robert Scotlund Vaile
9 PO Box 727
10 Kenwood, CA 95452
11 (707) 833-2350
12 *Petitioner in Proper Person*

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4 (707) 833-2350
5 *Petitioner in Proper Person*

6 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

7 ROBERT SCOTLUND VAILE,
8

9 Petitioner,

Supreme Court Case No: _____

District Court Case No: 98D230385

10 vs.
11

12 THE EIGHTH JUDICIAL DISTRICT
13 COURT OF THE STATE OF
14 NEVADA, IN AND FOR THE
15 COUNTY OF CLARK, AND THE
16 HONORABLE CHERYL B. MOSS,
17 DISTRICT JUDGE, FAMILY COURT
18 DIVISION,

19 Respondents.

20 **AFFIDAVIT OF ROBERT SCOTLUND VAILE IN SUPPORT OF**
21 **PETITION FOR A WRIT OF MANDAMUS OR PROHIBITION**

22
23 Robert Scotlund Vaile, under penalty of perjury under the laws of the State
24 of Nevada, declares as follows:

- 25 1. I am the Plaintiff in this case.
26 2. I am making this Declaration in support of the Petition for a Writ of
27 Mandamus or Prohibition.
28

- 1 3. I have written with my own hand and am familiar with the contents of the
2 petition and the emergency motion, and those matters that I do not have
3 personal knowledge of, I state on information and belief.
- 4 4. I reside in Kenwood, California.
- 5 5. In April of 2002, this Court relinquished both personal and subject-matter
6 jurisdiction of both Plaintiff and Defendant in this case based on the finding
7 that neither party had ever resided in Nevada.
- 8 6. In July, 2003 the lower court entered an order for attorney's fees in the
9 previous litigation surrounding the jurisdiction of the Nevada courts.
- 10 7. I have never received notice that this order was registered in any state where
11 I have lived.
- 12 8. On June 16, 2009, Porsboll's counsel issued a Nevada writ of execution and
13 garnishment to a Nevada branch of my California employer, Deloitte &
14 Touche LLP ("Deloitte"), in an attempt to seize my California earnings.
- 15 9. I requested and obtained a California TRO prohibiting Deloitte from
16 garnishing my earnings based on the writ of garnishment because that
17 Nevada judgment had not been domesticated in California.
- 18 10. I understood the Nevada judgment to have expired in June 2009.
- 19 11. I received no notice regarding the judgment's renewal.
- 20 12. Since my employer, Deloitte, was restrained from garnishing my salary, the
21 Nevada family court ordered me to "self-garnish," and to interplead 25% of
22 my salary to the clerk of the court in payment of the 2003 attorney fee award
23 or face criminal contempt on October 26, 2010.
- 24 13. Shortly thereafter, Porsboll's California counsel admitted in filings to the
25 California court that the 2003 Nevada judgment had not, in fact, been
26 renewed.
- 27 14. California counsel made assurances to me directly, both verbally and in
28 email, that the Nevada garnishment would not be pursued.

1 15. Because of these assurances, I did not interplead funds to the family court in
2 satisfaction of the 2003 judgment.

3 16. On February 3, 2010, the lower court entered a stipulation and order
4 quashing the Nevada Writ of Garnishment based on the fact that the 2003
5 judgment had not been renewed.

6 17. The family court scheduled a show cause hearing for March 8, 2010 and
7 required that I show cause for why I should not be held in contempt of court
8 for not interpleading funds to the clerk of court in satisfaction of the expired
9 order.

10 18. The family court ordered me to pay \$4,696.64 by March 8, 2010 or face
11 criminal contempt sanctions.

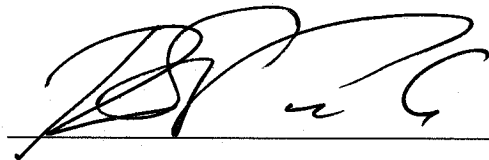
12 19. I have remained current on child support payments since this court entered
13 support orders in March 2008.

14 20. But I do have funds available to me to pay these additional amounts ordered
15 by the family court, and will be forced to file bankruptcy or be subject to
16 imprisonment on March 8, 2010 if this Court does not act.

17 21. I am respectfully requesting that Judge Moss be immediately prohibited by
18 this Honorable Court from enforcing an expired order or requiring payment
19 of funds on threat of contempt.

20 22. Further I say not.

21 Under penalty of perjury, State of Nevada.

22
23 
24 _____

25 Robert Scotlund Vaile
26
27
28

1 Robert Scotlund Vaile
2 PO Box 727
3 Kenwood, CA 95452
4 (707) 833-2350
5 *Petitioner in Proper Person*

6 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

7 ROBERT SCOTLUND VAILE,
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9 Petitioner,

Supreme Court Case No: _____
District Court Case No: 98D230385

10 vs.
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13 COURT OF THE STATE OF
14 NEVADA, IN AND FOR THE
15 COUNTY OF CLARK, AND THE
16 HONORABLE CHERYL B. MOSS,
17 DISTRICT JUDGE, FAMILY COURT
18 DIVISION,

19 Respondents.

20 **CERTIFICATE OF SERVICE**

21 Petitioner Robert Scotlund Vaile hereby certifies that a true and correct copy
22 of the following documents with attached exhibits were served

- 23 1) Emergency Motion to Expedite Supreme Court Review of Petition for
24 Writ of Mandamus or Prohibition
25
26 2) Affidavit of Robert Scotlund Vaile in Support of Emergency Motion to
27 Expedite Review of Petition for a Writ of Mandamus or Prohibition
28
3) Petition for Writ of Mandamus or Prohibition

1 4) Affidavit of Robert Scotlund Vaile in Support of Writ of Mandamus or
2 Prohibition

3 by depositing the same in the U.S. Mail at Santa Rosa, California in a sealed
4 envelope, first-class postage pre-paid and addressed as follows:
5

6 Marshal S. Willick
7 Willick Law Group
8 3591 E. Bonanza Road, Suite 200
9 Las Vegas, NV 89110-2101
 Attorneys for Real Party in Interest

10 Honorable Cheryl B. Moss
11 Eighth Judicial District Court
12 Family Division
13 601 North Pecos Road
 Las Vegas, NV 89101-2408

14
15 Dated this 16th day of February, 2010.

16
17 

18 Robert Scotlund Vaile
19 PO Box 727
20 Kenwood, CA 95452
21 (707) 833-2350
 Petitioner in Proper Person

**SUPREME COURT OF THE STATE OF NEVADA
OFFICE OF THE CLERK**

ROBERT SCOTLUND VAILE,
Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF
NEVADA, IN AND FOR THE COUNTY OF CLARK, AND THE
HONORABLE CHERYL MOSS, DISTRICT JUDGE, FAMILY COURT
DIVISION,

Respondents,

and

CISILIE A. PORSBOLL F/K/A CISILIE A. VAILE,
Real Party in Interest.

Supreme Court No. 55446

District Court Case No.

RECEIPT FOR DOCUMENTS

TO: Cheryl B. Moss , District Judge
Robert Scotlund Vaile
Willick Law Group and Marshal S. Willick

You are hereby notified that the Clerk of the Supreme Court has received and/or filed the following:

02/17/10	Received Filing Fee. \$250.00 from Robert Scotlund Vaile check no. 1155.
02/17/10	Filed Proper Person Petition for Writ. Petition for Writ of Mandamus or Prohibition.
02/17/10	Filed Appendix to Petition for Writ.
02/17/10	Received Proper Person Motion. Emergency Motion to Expedite Supreme Court Review of Petition for Writ of Mandamus or Prohibition.

DATE: February 17, 2010

Tracie Lindeman, Clerk of Court