

ORIGINAL

IN THE SUPREME COURT OF THE STATE OF NEVADA

LISA MYERS,

Petitioner,

vs.

CALEB O. HASKINS,

Respondent.

) Supreme Court Case No. 57621

) District Court Case No. 00-D-434495

PROPER PERSON  
RECEIVED/ENTERED

FEB 18 2011  
TRACIE K. LINDEMAN  
CLERK OF SUPREME COURT

NRAP 27(e) CERTIFICATE OF PETITIONER LISA MYERS

Petitioner hereby states the following as per NRAP 27(e)3:

(A) Lisa Myers, Petitioner In Proper Person, 9360 West Flamingo Road, Suite. 110-326, Las Vegas, Nevada 89147; (702) 401.4440; and,

Caleb Haskins, Respondent through his counsel Amanda M. Roberts, Esq., 2011 Pinto Lane, Suite 100, Las Vegas, Nevada 89106.

(B) At the January 19, 2011 hearing, which was to be a 16.2 Case Management Conference, Judge Moss allowed opposing counsel, Amanda Roberts Motion to be heard even though it was provided to this Petitioner 5 minutes prior to the hearing. Therefore, the Judge allowed Respondent three full unsupervised days with the parties minor child, Sydney Rose Myers-Haskins (now 11mos.), specifically awarded the parties Joint Physical and Legal Custody of the minor child, despite the fact the Petitioner has been the *de facto* Primary Physical and Legal Custodian of the minor child. The Judge further made her decision despite the evidence of his mental and physical impairments, conviction, extensive history of drug and alcohol abuse, anger problems, domestic abuse issues, his abandonment of the minor child who has a history of RSV, Respondent's own admissions in Court and his parents admissions. Recently, the minor child was returned to Petitioner lethargic, dehydrated, listless and ill. She was then diagnosed with a serious, contagious illness in which her Pediatrician wrote a note stating she is to remain in Petitioner's care.

RECEIVED

FEB 18 2011

TRACIE K. LINDEMAN  
CLERK OF SUPREME COURT  
DEPUTY CLERK

11-15-248

1 Further, Respondent previously signed a Joint Agreement giving Petitioner Sole  
2 Physical and Sole Legal Custody of the parties minor child waiving any visitation.  
3 Respondent also waived any visitation and refused a drug test at the prior TPO  
hearing, as well.

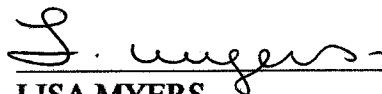
4 The Court further Ordered the Petitioner to undergo a psychological evaluation  
5 based on a completely unrelated matter which is currently on Appeal (reference  
6 Supreme Court Case No. 56426) and specifically a 2003 report by an unqualified  
7 individual (per the State Psychological Board) and despite the acceptance of  
8 expert testimony and reports rebutting same. The Court not only forced Petitioner  
to discuss in detail this completely unrelated matter which is on Appeal, but placed  
her in the position of defending herself in this matter.

9 Petitioner is extremely concerned about the health and safety of the minor child  
10 during the 3 days while in Respondent's "care" and "custody" and requests her  
11 emergency Motion be granted so as to protect the child, her best interests, rights  
and overall safety.

12  
13 (C) Counsel for Respondent Caleb Haskins was served a copy of the Motion in its  
original form February 1, 2011, the Amended Motion on February 15, 2011.

14 Further, Petitioner is filing an Emergency Petition for Rehearing Under NRAP 40  
15 and, Emergency Motion Under NRAP 27(e) due to the Supreme Court's Order  
16 Denying Petitioner's Emergency Motion for Stay, which will be served upon  
Respondent's counsel on February 17, 2011.

17  
18 Dated this 16<sup>th</sup> day of February, 2011.

19  
20   
21 LISA MYERS  
22 9360 West Flamingo Road, No. 110-326  
Las Vegas, Nevada 89147  
23 **Petitioner In Proper Person**

24 ///

25 ///

26 ///

IN THE SUPREME COURT OF THE STATE OF NEVADA

LISA MYERS,

Petitioner,

vs.

CALEB O. HASKINS,

Respondent.

) Supreme Court Case No. 57621

) District Court Case No. 00-D-434495

PROPER PERSON  
RECEIVED/ENTERED

FEB 18 2011  
TRACIE K. LINDEMAN  
CLERK OF SUPREME COURT

NRAP 27(c) CERTIFICATE OF PETITIONER LISA MYERS

Petitioner hereby states the following as per NRAP 27(e)3:

(A) Lisa Myers, Petitioner In Proper Person, 9360 West Flamingo Road, Suite. 110-326, Las Vegas, Nevada 89147; (702) 401.4440; and,

Caleb Haskins, Respondent through his counsel Amanda M. Roberts, Esq., 2011 Pinto Lane, Suite 100, Las Vegas, Nevada 89106.

(B) At the January 19, 2011 hearing, which was to be a 16.2 Case Management Conference, Judge Moss allowed opposing counsel, Amanda Roberts Motion to be heard even though it was provided to this Petitioner 5 minutes prior to the hearing. Therefore, the Judge allowed Respondent three full unsupervised days with the parties minor child, Sydney Rose Myers-Haskins (now 11mos.), specifically awarded the parties Joint Physical and Legal Custody of the minor child, despite the fact the Petitioner has been the *de facto* Primary Physical and Legal Custodian of the minor child. The Judge further made her decision despite the evidence of his mental and physical impairments, conviction, extensive history of drug and alcohol abuse, anger problems, domestic abuse issues, his abandonment of the minor child who has a history of RSV, Respondent's own admissions in Court and his parents admissions. Recently, the minor child was returned to Petitioner lethargic, dehydrated, listless and ill. She was then diagnosed with a serious, contagious illness in which her Pediatrician wrote a note stating she is to remain in Petitioner's care.

RECEIVED

FEB 18 2011

TRACIE K. LINDEMAN  
CLERK OF SUPREME COURT  
DEPUTY CLERK