

IN THE SUPREME COURT OF THE STATE OF NEVADA

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LISA MYERS,)
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 Petitioner,)
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 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

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NRAP 27(e) CERTIFICATE OF PETITIONER LISA MYERS

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

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

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

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(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 11 mos.), 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.

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

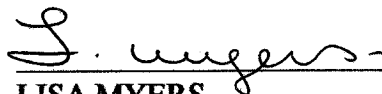
The Court further Ordered the Petitioner to undergo a psychological evaluation based on a completely unrelated matter which is currently on Appeal (reference Supreme Court Case No. 56426) and specifically a 2003 report by an unqualified individual (per the State Psychological Board) and despite the acceptance of 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.

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

(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.

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

Dated this 16th day of February, 2011.



LISA MYERS
9360 West Flamingo Road, No. 110-326
Las Vegas, Nevada 89147
Petitioner In Proper Person

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