

CLERK OF THE COURT

MEHMET SAIT KAR  
Kemalpasa Mahallesi  
4464 sol. no: 30  
Incirlik/Saricam  
Adana/Turkey  
+90-533-964-9642  
saitkar@hotmail.com  
Petitioner in Proper Person

Electronically Filed  
Jul 02 2014 11:58 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

KATHLEEN KAR,

Plaintiff,

vs.

MEHMET KAR,

Defendant,

) Case No. D441849

) Dept No. P

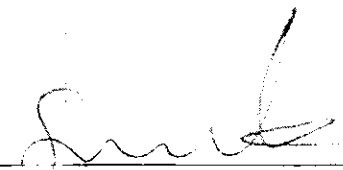
**NOTICE OF APPEAL**

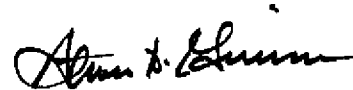
COMES NOW, Defendant, in Proper Person and gives notice that Defendant intends to  
file an Appeal in Case D441849, Dept P, Eighth Judicial District Court, Clark County, Nevada.

Plaintiff requests waiver of appeal bond in this matter, and to proceed in Proper Person.

This appeal is specifically related to the ORDER, filed 6/16/14, regarding jurisdiction and  
contempt issues. All parties are US Citizens, presently living abroad, who were divorced in  
Nevada.

Dated this 25 day of June, 2014.

  
\_\_\_\_\_  
MEHMET KAR  
Defendant in Proper Person



CLERK OF THE COURT

ASTA

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

In the Matter of the Joint Petition for Divorce of:  
KATHLEEN A. KAR and MEHMET SAIT KAR,

Case No: D-11-441849-Z  
Dept No: P

Petitioner(s),

**CASE APPEAL STATEMENT**

1. Appellant(s): Mehmet Kar

2. Judge: Sandra Pomrenze

3. Appellant(s): Mehmet Kar

Counsel:

Mehmet Kar  
kernalpasa Mahallesi  
4464 Sol. No 30  
Incirlik/Saricam  
Adana, Turkey

4. Respondent (s): Kathleen A. Kar

Counsel:

Kathleen A. Kar  
PSC 46 Box 75  
APO, AE 09469

5. Respondent's Attorney Licensed in Nevada: Yes

6. Appellant Represented by Appointed Counsel In District Court: No

7. Appellant Represented by Appointed Counsel On Appeal: N/A

1 8. Appellant Granted Leave to Proceed in Forma Pauperis\*\*: N/A

2 *\*\*Expires 1 year from date filed*

3 Appellant Filed Application to Proceed in Forma Pauperis: Yes, June 26, 2014

4 9. Date Commenced in District Court: February 14, 2011

5 10. Brief Description of the Nature of the Action: DOMESTIC - Marriage Dissolution

6 Type of Judgment or Order Being Appealed: Misc. Order

7 11. Previous Appeal: No

8 Supreme Court Docket Number(s): N/A

9 12. Child Custody or Visitation: Visitation

10 13. Possibility of Settlement: Unknown

11 Dated This 30 day of June 2014.

12 Steven D. Grierson, Clerk of the Court

13 

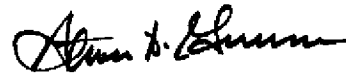
14 Teodora Jones, Deputy Clerk

15 200 Lewis Ave

16 PO Box 551601

17 Las Vegas, Nevada 89155-1601

18 (702) 671-0512



CLERK OF THE COURT

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Kemalpasa Mahallesi  
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Petitioner in Proper Person

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

KATHLEEN KAR,

Plaintiff,

vs.

MEHMET KAR,

Defendant,

) Case No. D441849

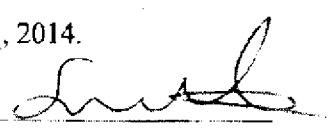
) Dept No. P

**REQUEST FOR AUTHORIZATION TO PROCEED IN PROPER PERSON;  
WAIVER OF APPEAL BOND;  
AND TO TRANSMIT ENTIRE RECORD ON FILE**

COMES NOW, Defendant MEHMET KAR, and requests authorization of the court to proceed in Proper Person, and that the court submit the entire record on file.

Plaintiff also requests the court waive the bond in this matter and cost of transcripts, as this is a matter of jurisdiction, and contempt issues.

Dated this 26<sup>th</sup> day of June, 2014.

  
MEHMET KAR

Defendant in Proper Person

**CASE SUMMARY****CASE NO. D-11-441849-Z**

In the Matter of the Joint Petition for Divorce of:  
**Kathleen A Kar and Mehmet Sait Kar, Petitioners.**

§  
§  
§  
§  
§

Location: **Department P**  
 Judicial Officer: **Pomrenze, Sandra**  
 Filed on: **02/14/2011**

**CASE INFORMATION****Related Cases**

D-13-483046-R (Related Family Case)

Case Type: **Divorce - Joint Petition**Subtype: **Joint Petition Subject Minor(s)****Statistical Closures**

06/16/2014 Settled/Withdrawn With Judicial Conference or Hearing

12/16/2013 Settled/Withdrawn Without Judicial Conference or Hearing

03/15/2011 Decision without Trial / Hearing

Case Status: **06/16/2014 Closed**Case Flags: **Order After Hearing Required  
Appealed to the Nevada Supreme  
Court****DATE****CASE ASSIGNMENT****Current Case Assignment**

Case Number D-11-441849-Z  
 Court Department P  
 Date Assigned 02/14/2011  
 Judicial Officer Pomrenze, Sandra

**PARTY INFORMATION****Petitioner****Kar, Kathleen A**

PSC 46 Box 75

APO, AE 09469

**Pro Se**

618-550-8600(H)

**Kar, Mehmet Sait**

Kemelpasa Mah, 4464 Sok. No 38

Incirlik/Saricam Adana Turkey

**Pro Se**

618-550-8600(H)

**Subject Minor****Kar, Alexander Kaan****DATE****EVENTS & ORDERS OF THE COURT****EVENTS**

06/26/2014



Notice of Appeal

Filed by: Petitioner Kar, Mehmet Sait

06/26/2014



Request

Filed by: Petitioner Kar, Mehmet Sait

Request for Authorization to Proceed in Proper Person; Waiver of Appeal Bond; and to Transmit Entire Record on File

06/16/2014



Withdrawal of Attorney

Filed by: Petitioner Kar, Kathleen A

Withdrawal of Attorney for Plaintiff

06/16/2014



Notice of Entry of Order

Filed by: Petitioner Kar, Kathleen A

Notice of Entry of Order

06/16/2014



Order

Order After Hearing

05/13/2014



Reply to Opposition

Filed by: Petitioner Kar, Mehmet Sait

**CASE SUMMARY**

**CASE NO. D-11-441849-Z**

*Reply to Opposition and Opposition to Countermotion*

05/07/2014



Notice of Change of Address

Filed by: Petitioner Kar, Kathleen A

*Notice of Change of Address*

05/07/2014



Certificate of Service

Filed by: Petitioner Kar, Kathleen A

*Certificate of Service*

05/07/2014



Opposition and Countermotion

Filed by: Petitioner Kar, Kathleen A

*Opposition To Motion To Hold Mother In Contempt Of Court Et Al. And Countermotion To Dismiss Case For Lack Of Subject Matter Jurisdiction/Improper Forum; Affidavit Of Attorney Jason P. Stoffel, Esq. On Behalf Of Plaintiff Under Nrs 15.010*

05/06/2014



Notice

Filed by: Petitioner Kar, Mehmet Sait

*Notice of Intent to Appear by Communication Equipment*

04/29/2014



Financial Disclosure Form

Filed by: Petitioner Kar, Mehmet Sait

*General Financial Disclosure Form*

04/25/2014



Certificate of Mailing

Filed by: Petitioner Kar, Mehmet Sait

*Certificate of Mailing*

04/25/2014



Certificate of Mailing

Filed by: Petitioner Kar, Mehmet Sait

*Certificate of Mailing*

04/25/2014



Certificate of Facsimile

Filed by: Petitioner Kar, Mehmet Sait

*Certificate of Facsimile*

04/22/2014



Motion

Filed by: Petitioner Kar, Mehmet Sait

*Motion to Hold Mother in Contempt for Termination Contact with Child; to Set Aside or in the Alternative, Modify Visitation; Modification of Child Support Imputed Without Any Evidence of Actual Income; Compensatory Visitation; Sanctions; Award of Fees and Costs; and Related Relief*

12/16/2013



Domestic Notice to Statistically Close Case

*Domestic Notice to Statistically Close Case*

07/15/2013



Notice of Entry of Order

Filed by: Petitioner Kar, Kathleen A

*Notice of Entry of Order*

07/12/2013



Order

Filed by: Petitioner Kar, Kathleen A

*Order After Hearing*

06/20/2013



Miscellaneous Filing

*Defendant Respond to Plaintiff*

05/15/2013



Certificate of Mailing

Filed by: Petitioner Kar, Kathleen A

*Certificate Of Mailing*

05/13/2013



Motion

Filed by: Petitioner Kar, Kathleen A

*Plaintiff's Motion For Sole Physical And Sole Legal Custody, For Specific Visitation For Defendant, For Child Support Arrears, To Reduce Arrears To Judgment, For Wage*

# CASE SUMMARY

CASE NO. D-11-441849-Z

*Garnishment, For Costs, And Other Related Relief*

05/13/2013



Schedule of Arrearages

Filed by: Petitioner Kar, Kathleen A  
*Schedule Of Arrearages*

05/13/2013



Financial Disclosure Form

Filed by: Petitioner Kar, Kathleen A  
*Financial Disclosure Form*

03/16/2011



Certificate of Mailing

Filed by: Petitioner Kar, Kathleen A  
*Certificate Of Mailing*

03/15/2011



Decree of Divorce

Filed by: Petitioner Kar, Kathleen A  
*Decree Of Divorce*

02/28/2011



Child Support and Welfare Party Identification Sheet

Filed by: Petitioner Kar, Mehmet Sait

02/28/2011



Child Support and Welfare Party Identification Sheet

Filed by: Petitioner Kar, Kathleen A

02/23/2011



Notice of Seminar Completion EDCR 5.07

Filed by: Petitioner Kar, Kathleen A  
*Notice Of Seminar Completion - EDCR 5.07*

02/23/2011



Notice of Seminar Completion EDCR 5.07

Filed by: Petitioner Kar, Mehmet Sait  
*Notice Of Seminar Completion - EDCR 5.07*

02/23/2011



Affidavit of Resident Witness

Filed by: Petitioner Kar, Kathleen A  
*Affidavit Of Resident Witness*

02/14/2011



Joint Petition for Summary Decree of Divorce

Filed by: Petitioner Kar, Kathleen A  
*Joint Petition For Summary Decree Of Divorce*

## **DISPOSITIONS**

07/12/2013

**Judgment** (Judicial Officer: Pomrenze, Sandra)  
Judgment (\$2,800.00, In Full , Child Support Arrears)

## **HEARINGS**

05/22/2014



**All Pending Motions** (10:00 AM) (Judicial Officer: Pomrenze, Sandra)

Matter Heard;  
Journal Entry Details:

*MEHMET SAIT KAR'S MOTION TO HOLD MOTHER IN CONTEMPT FOR TERMINATION OF CONTACT WITH CHILD; TO SET ASIDE, OR IN THE ALTERNATIVE, MODIFY VISITATION; MODIFICATION OF CHILD SUPPORT IMPUTED WITHOUT ANY EVIDENCE OF ACTUAL INCOME; COMPENSATORY VISITATION; SANCTIONS; AWARD OF FEES AND COSTS AND RELATED RELIEF...KATHLEEN KAR'S OPPOSITION AND COUNTERMOTION TO DISMISS CASE FOR LACK OF JURISDICTION/IMPROPER FORUM* Amber Robinson, bar number 103731, present on behalf of Mehmet Sait Kar in an unbundled capacity. Court inquired how it would have jurisdiction when Ms. Kar is in the military and stationed in the United Kingdom (U.K.) and Mr. Kar is in Turkey. Court inquired if Ms. Kar moved permanently to the U.K. and if she maintained a Las Vegas address. Mr. Stoffel replied she moved to the U.K. and did not have a Las Vegas address. Argument and discussion regarding the jurisdictional issues and how this Court would enforce any Orders. Court advised counsel Mr. Kar would need to enforce the Order through the courts in the U.K. under the Hague Convention. Mr. Stoffel advised the Court all Ms. Kar's belongings are in the U.K. and she has gotten remarried since the last hearing. Argument and discussion regarding

# CASE SUMMARY

CASE NO. D-11-441849-Z

*Ms. Kar's opportunities in the U.K. through the air force, her inability to have known in June 2014 what orders she would receive from the air force and the Court's inability to give Mr. Kar a remedy. Further argument and discussion regarding the jurisdictional issues and Mr. Kar's request for reconsideration. Ms. Robinson requested Plaintiff's address in the U.K. Mr. Stoffel replied he would provide it when he withdraws from the case. COURT ORDERED the following: 1. The MOTION is DENIED IN ITS ENTIRETY. 2. There shall be NO AWARD of ATTORNEY'S FEES to Ms. Kar. 3. This is a FINAL ORDER. Mr. Kar shall PROCEED in the UNITED KINGDOM. Mr. Stoffel shall PREPARE the ORDER. Ms. Robinson shall REVIEW the ORDER then COUNTERSIGN. ;*

05/22/2014 **Opposition & Countermotion** (10:00 AM) (Judicial Officer: Pomrenze, Sandra)

Events: 05/07/2014 Opposition and Countermotion

*Kathleen Kar's Opposition and Countermotion to Dismiss Case for Lack of Jurisdiction/Improper Forum*


No Ruling;

05/22/2014 **Motion for Contempt** (10:00 AM) (Judicial Officer: Pomrenze, Sandra)

Events: 04/22/2014 Motion

*Mehmet Sait Kar's Motion to Hold Mother in Contempt for Termination Contact With Child, to Set Aside or in the Alternative, Modify Visitation, Modification of Child Support Imputed Without Any Evidence of Actual Income, Compensatory Visitation, Sanctions, Award of Fees and Costs, and Related Relief*

Denied;

06/11/2013  **Motion for Child Custody** (11:00 AM) (Judicial Officer: Pomrenze, Sandra)

Events: 05/13/2013 Motion

*Kathleen Kar's Motion For Sole Physical And Sole Legal Custody, For Specific Visitation For Deft, For Child Support Arrears, To Reduce Arrears To Judgment, For Wage Garnishment, For Costs, And Other Related Relief*

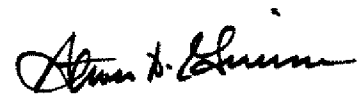
## MINUTES

Granted;

Journal Entry Details:

*KATHLEEN KAR'S MOTION FOR SOLE PHYSICAL AND SOLE LEGAL CUSTODY, FOR SPECIFIC VISITATION FOR DEFENDANT, FOR CHILD SUPPORT ARREARS, TO REDUCE ARREARS TO JUDGMENT, FOR WAGE GARNISHMENT, FOR COSTS, AND OTHER RELATED RELIEF. Attorney Stoffel stated Petitioner Mehmet resides in Turkey and he received an e-mail from Mehmet on 6/8/13 indicating he received the Motion and does not intend to participate. Upon inquiry by the Court, attorney Stoffel stated Petitioner Kathleen has received no support and Mehmet is not regularly involved with the child. Discussion regarding child support, attorney Stoffel stated he understands Mehmet is working for the Turkish Consulate but his income is not known at this time and requested child support be set at the Nevada Average Wage. COURT ORDERED, as follows: 1. Kathleen's Motion is GRANTED as unopposed; 2. Kathleen is awarded SOLE LEGAL CUSTODY; 3. Kathleen is awarded SOLE PHYSICAL CUSTODY; 4. Mehmet's VISITATION will be at Kathleen's SOLE DISCRETION; 5. CHILD SUPPORT ARREARS are set in the amount of \$2,800.00 through June 2013, which amount is REDUCED TO JUDGMENT against Mehmet; 6. Attorney Stoffel is to research to determine the current Nevada Average Wage, Mehmet's CHILD SUPPORT obligation will be MODIFIED to 18% of the Nevada Average Wage, that figure will be placed into the order from today's hearing and will become effective as of 7/1/13. Attorney Stoffel is to prepare the order from today's hearing. File is to be closed upon filing of the order. ;*





CLERK OF THE COURT

**ORDR**  
Jason P. Stoffel, Esq.  
State Bar of Nevada No. 8898  
**ROBERTS STOFFEL FAMILY LAW GROUP**  
2011 Pinto Lane, Suite 100  
Las Vegas, Nevada 89106  
PH: (702) 474-7007  
FAX: (702) 474-7477  
EMAIL: attorneys@lvfamilylaw.com  
Attorney for Plaintiff, Kathleen Kar

**DISTRICT COURT, FAMILY DIVISION**  
**CLARK COUNTY, NEVADA**

KATHLEEN A. KAR,

Plaintiff,

v.

MEHMET KAR,

Defendant.

) Case No: D441849

) Dept No: P

) **ORDER AFTER HEARING**

) Hearing Date: May 22, 2014

) Hearing Time: 10:00 a.m.

This matter having come before the Court on the 22<sup>nd</sup> day of May, 2014, on Defendant's Motion to Hold Mother in Contempt Et Al. and Countermotion to Dismiss Case for Lack of Jurisdiction, and the Defendant, Not Present, and represented by his attorney of record Amber, Robinson, Esq. in an unbundled capacity and the Plaintiff, Kathleen Kar, not present, but represented by and through her attorney of record, Jason P. Stoffel, Esq., of Roberts Stoffel Family Law Group, and the Court having read the pleadings and argument from counsel rules as follows:

IT IS HEREBY NOTED Defendant lives in Turkey and the Plaintiff has moved permanently to the United Kingdom with the military, has remarried, and no longer has a Nevada address.

**RECEIVED**

JUN 10 2014

FAMILY COURT  
DEPARTMENT P

Non-Trial Dispositions:  
☐ Other  
☐ Dismissed - Want of Prosecution  
☐ Involuntary (Statutory) Default Judgment  
☐ Transferred  
Settled/Withdrawn:  
☐ Without Judicial Conf/Hrg  
☐ With Judicial Conf/Hrg  
☐ By ADR  
Trial Dispositions:  
☐ Judgment Reached by Trial  
☐ Disposed After Trial

1 THE COURT FINDS that Defendant will need to enforce the Orders in the United  
2 Kingdom through the Hague Convention.

3 THE COURT FURTHER NOTED Mr. Robinson has requested Plaintiff's address in the  
4 United Kingdom. Attorney Stoffel replied that he will provide it in the Withdrawal of Attorney  
5 that will be filed with the Court.

6 THE COURT HEREBY ORDERS that the Defendant's Motion to hold the Plaintiff in  
7 contempt of Court is denied in its entirety.

8 THE COURT FURTHER ORDERED there shall be no attorney fees awarded to Plaintiff.

9 THE COURT FURTHER ORDERED this shall be a final Order of the Court and  
10 Defendant shall proceed in the United Kingdom.

11 THE COURT FURTHER ORDERED Attorney Stoffel shall prepare today's order and  
12 Attorney Robinson shall sign off.

13 IT IS SO ORDERED this 12<sup>th</sup> day of JUNE, 2014.

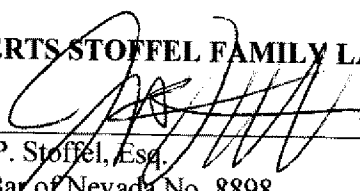
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District Court Judge  
SANDRA L. POMRENZE


Respectfully Submitted,

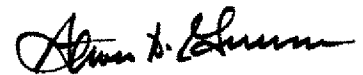
Reviewed as to form and content,

ROBERTS STOFFEL FAMILY LAW GROUP

ROBINSON LAW GROUP

21 By:  6/19/14  
22 Jason P. Stoffel, Esq.  
23 State Bar of Nevada No. 8898  
24 2011 Pinto Lane Ste. 100  
25 Las Vegas, Nevada 89106  
26 Phone: (702) 474-7007  
27 Fax: (702) 474-4777  
28 Email: attorneys@lvfamilylaw.com  
Attorneys for Plaintiff

By:   
Amber Robinson, Esq.  
State Bar of Nevada No. 10731  
1771 E. Flamingo Rd., Suite B-14  
Las Vegas, Nevada 89119  
PH: (702) 527-2625  
FAX: (702) 933-0924  
EMAIL:  
arobinson@familylawyerlasvegas.com  
Attorney for Defendant



CLERK OF THE COURT

1 **NEO**  
Jason P. Stoffel, Esq.  
2 State Bar of Nevada No. 8898  
**ROBERTS STOFFEL FAMILY LAW GROUP**  
3 2011 Pinto Lane, Suite 100  
Las Vegas, Nevada 89106  
4 PH: (702) 474-7007  
FAX: (702) 474-7477  
5 EMAIL: attorneys@lvfamilylaw.com  
Attorney for Plaintiff, Kathleen Kar  
6

7 **DISTRICT COURT**  
8 **CLARK COUNTY, NEVADA**

9  
10 KATHLEEN A. KAR,  
Plaintiff,

11 v.

12 MEHMET KAR,  
13 Defendant.  
14

) Case No: D441849  
) Dept No: P  
)  
)  
)

**NOTICE OF ENTRY OF ORDER**

15 Please take notice that an Order After Hearing was duly entered in the above referenced  
16 case on the 16<sup>th</sup> day of June, 2014 a copy of which is attached hereto and by reference fully  
17 incorporated herein.

18 DATED this 16<sup>th</sup> day of June, 2014.

19  
20 **ROBERTS STOFFEL FAMILY LAW GROUP**

21 By: 

22 Jason P. Stoffel, Esq.  
State Bar of Nevada No. 8898  
23 2011 Pinto Lane, Suite 100  
Las Vegas, Nevada 89106  
24 PH: (702) 474-7007  
FAX: (702) 474-7477  
25 EMAIL: attorneys@lvfamilylaw.com  
Attorney for Plaintiff, Kathleen Kar  
26  
27  
28

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**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, that on the  
11<sup>th</sup> day of June, 2014, I served a Notice of Entry of Order (With the Order attached) via  
electronic filing pursuant to Clark County District Court Administrative Order 14-2 for service of  
documents identified in *Rule 9* of the N.E.F.C.R.

Kathleen Kar  
kathleen\_kar@hotmail.com

Mehmet Sait Kar  
saitkar@hotmail.com

By:   
An Employee of Roberts Stoffel Family Law Group



CLERK OF THE COURT

1 **ORDR**  
Jason P. Stoffel, Esq.  
2 State Bar of Nevada No. 8898  
**ROBERTS STOFFEL FAMILY LAW GROUP**  
3 2011 Pinto Lane, Suite 100  
Las Vegas, Nevada 89106  
4 PH: (702) 474-7007  
FAX: (702) 474-7477  
5 EMAIL: attorneys@lvfamilylaw.com  
Attorney for Plaintiff, Kathleen Kar

6  
7 **DISTRICT COURT, FAMILY DIVISION**  
8 **CLARK COUNTY, NEVADA**

9 KATHLEEN A. KAR,  
10 Plaintiff,

11 v.

12 MEHMET KAR,  
13 Defendant.

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) Dept No: P

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) Hearing Date: May 22, 2014  
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14  
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18 Motion to Hold Mother in Contempt Et Al. and Countermotion to Dismiss Case for Lack of  
19 Jurisdiction, and the Defendant, Not Present, and represented by his attorney of record Amber,  
20 Robinson, Esq. in an unbundled capacity and the Plaintiff, Kathleen Kar, not present, but  
21 represented by and through her attorney of record, Jason P. Stoffel, Esq., of Roberts Stoffel  
22 Family Law Group, and the Court having read the pleadings and argument from counsel rules as  
23 follows:

24 IT IS HEREBY NOTED Defendant lives in Turkey and the Plaintiff has moved  
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26 address.

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JUN 10 2014

FAMILY COURT  
DEPARTMENT P

Non-Trial Dispositions:  
☐ Other  
☐ Dismissed - Want of Prosecution  
☐ Involuntary (Statutory) Dismissal  
☐ Default Judgment  
☐ Transferred  
Settled/Withdrawn:  
☐ Without Judicial Conf/Hrg  
☐ With Judicial Conf/Hrg  
☐ By ADR  
Trial Dispositions:  
☐ Judgment Entered by Trial Court  
☐ Judgment Entered by Trial Officer  
☐ Disposed After Trial

1 THE COURT FINDS that Defendant will need to enforce the Orders in the United  
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10 Defendant shall proceed in the United Kingdom.

11 THE COURT FURTHER ORDERED Attorney Stoffel shall prepare today's order and  
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13 IT IS SO ORDERED this 12<sup>th</sup> day of June, 2014.

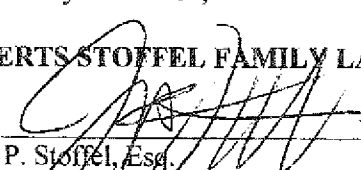
14  
15  
16  
17   
18 District Court Judge  
SANDRA L. POMRENZE


19 Respectfully Submitted,

Reviewed as to form and content,

20 **ROBERTS STOFFEL FAMILY LAW GROUP**

**ROBINSON LAW GROUP**

21 By:  6/19/14  
22 Jason P. Stoffel, Esq.  
23 State Bar of Nevada No. 8898  
24 2011 Pinto Lane Ste. 100  
25 Las Vegas, Nevada 89106  
26 Phone: (702) 474-7007  
27 Fax: (702) 474-4-7477  
28 Email: attorneys@lvfamilylaw.com  
Attorneys for Plaintiff

By:   
Amber Robinson, Esq.  
State Bar of Nevada No. 10731  
1771 E. Flamingo Rd., Suite B-14  
Las Vegas, Nevada 89119  
PH: (702) 527-2625  
FAX: (702) 933-0924  
EMAIL:  
arobinson@familylawyerlasvegas.com  
Attorney for Defendant

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Joint Petition**

**COURT MINUTES**

June 11, 2013

D-11-441849-Z

In the Matter of the Joint Petition for Divorce of:  
Kathleen A Kar and Mehmet Sait Kar, Petitioners.

**June 11, 2013**

**11:00 AM**

**Motion for Child  
Custody**

**HEARD BY:** Pomrenze, Sandra

**COURTROOM:** Courtroom 10

**COURT CLERK:** Debra Burak

**PARTIES:**

Alexander Kar, Subject Minor, not present

Kathleen Kar, Petitioner, present

Mehmet Kar, Petitioner, not present

Jason Stoffel, Attorney, present

Pro Se

<b>JOURNAL ENTRIES</b>
------------------------

- KATHLEEN KAR'S MOTION FOR SOLE PHYSICAL AND SOLE LEGAL CUSTODY, FOR SPECIFIC VISITATION FOR DEFENDANT, FOR CHILD SUPPORT ARREARS, TO REDUCE ARREARS TO JUDGMENT, FOR WAGE GARNISHMENT, FOR COSTS, AND OTHER RELATED RELIEF

Attorney Stoffel stated Petitioner Mehmet resides in Turkey and he received an e-mail from Mehmet on 6/8/13 indicating he received the Motion and does not intend to participate. Upon inquiry by the Court, attorney Stoffel stated Petitioner Kathleen has received no support and Mehmet is not regularly involved with the child. Discussion regarding child support, attorney Stoffel stated he understands Mehmet is working for the Turkish Consulate but his income is not known at this time and requested child support be set at the Nevada Average Wage.

COURT ORDERED, as follows:

1. Kathleen's Motion is GRANTED as unopposed;
2. Kathleen is awarded SOLE LEGAL CUSTODY;
3. Kathleen is awarded SOLE PHYSICAL CUSTODY;

4. Mehmet's VISITATION will be at Kathleen's SOLE DISCRETION;
5. CHILD SUPPORT ARREARS are set in the amount of \$2,800.00 through June 2013, which amount is REDUCED TO JUDGMENT against Mehmet;
6. Attorney Stoffel is to research to determine the current Nevada Average Wage, Mehmet's CHILD SUPPORT obligation will be MODIFIED to 18% of the Nevada Average Wage, that figure will be placed into the order from today's hearing and will become effective as of 7/1/13.

Attorney Stoffel is to prepare the order from today's hearing.

File is to be closed upon filing of the order.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Joint Petition****COURT MINUTES****May 22, 2014**

D-11-441849-Z

In the Matter of the Joint Petition for Divorce of:  
Kathleen A Kar and Mehmet Sait Kar, Petitioners.

**May 22, 2014****10:00 AM****All Pending Motions****HEARD BY:** Pomrenze, Sandra**COURTROOM:** Courtroom 10**COURT CLERK:** Carol Critchett**PARTIES:**

Alexander Kar, Subject Minor, not present

Kathleen Kar, Petitioner, not present

Mehmet Kar, Petitioner, not present

Jason Stoffel, Attorney, present

Pro Se

<b>JOURNAL ENTRIES</b>
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- MEHMET SAIT KAR'S MOTION TO HOLD MOTHER IN CONTEMPT FOR TERMINATION OF CONTACT WITH CHILD; TO SET ASIDE, OR IN THE ALTERNATIVE, MODIFY VISITATION; MODIFICATION OF CHILD SUPPORT IMPUTED WITHOUT ANY EVIDENCE OF ACTUAL INCOME; COMPENSATORY VISITATION; SANCTIONS; AWARD OF FEES AND COSTS AND RELATED RELIEF...KATHLEEN KAR'S OPPOSITION AND COUNTERMOTION TO DISMISS CASE FOR LACK OF JURISDICTION/IMPROPER FORUM

Amber Robinson, bar number 103731, present on behalf of Mehmet Sait Kar in an unbundled capacity.

Court inquired how it would have jurisdiction when Ms. Kar is in the military and stationed in the United Kingdom (U.K.) and Mr. Kar is in Turkey. Court inquired if Ms. Kar moved permanently to the U.K. and if she maintained a Las Vegas address. Mr. Stoffel replied she moved to the U.K. and did not have a Las Vegas address.

Argument and discussion regarding the jurisdictional issues and how this Court would enforce any Orders. Court advised counsel Mr. Kar would need to enforce the Order through the courts in the U.K. under the Hague Convention. Mr. Stoffel advised the Court all Ms. Kar's belongings are in the U.K. and she has gotten remarried since the last hearing.

Argument and discussion regarding Ms. Kar's opportunities in the U.K. through the air force, her inability to have known in June 2014 what orders she would receive from the air force and the Court's inability to give Mr. Kar a remedy.

Further argument and discussion regarding the jurisdictional issues and Mr. Kar's request for reconsideration. Ms. Robinson requested Plaintiff's address in the U.K. Mr. Stoffel replied he would provide it when he withdraws from the case.

COURT ORDERED the following:

1. The MOTION is DENIED IN IT'S ENTIRETY.
2. There shall be NO AWARD of ATTORNEY'S FEES to Ms. Kar.
3. This is a FINAL ORDER. Mr. Kar shall PROCEED in the UNITED KINGDOM.

Mr. Stoffel shall PREPARE the ORDER. Ms. Robinson shall REVIEW the ORDER then COUNTERSIGN.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**



EIGHTH JUDICIAL DISTRICT COURT CLERK'S OFFICE  
**NOTICE OF DEFICIENCY**  
ON APPEAL TO NEVADA SUPREME COURT

MEHMER KAR  
KEMALPASA MEHALLESİ  
4464 SOL. NO. 30  
INCIRLIK/SARICAM  
ADANA, TURKEY

DATE: June 30, 2014  
CASE: D441849

**RE CASE:** In the Matter of the Joint Petition for Divorce of: KATHLEEN A. KAR and MEHMET SAIT KAR

NOTICE OF APPEAL FILED: June 26, 2014

**YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.**

**PLEASE NOTE: DOCUMENTS NOT TRANSMITTED HAVE BEEN MARKED:**

- ☒ \$250 – Supreme Court Filing Fee\*\*
  - If the \$250 Supreme Court Filing Fee was not submitted along with the original Notice of Appeal, it must be mailed directly to the Supreme Court. The Supreme Court Filing Fee will not be forwarded by this office if submitted after the Notice of Appeal has been filed.
- ☐ \$24 – District Court Filing Fee (Make Check Payable to the District Court)\*\*
- ☒ \$500 – Cost Bond on Appeal (Make Check Payable to the District Court)\*\*
  - NRAP 7: Bond For Costs On Appeal in Civil Cases
- ☐ Case Appeal Statement
  - NRAP 3 (a)(1), Form 2
- ☐ Order
- ☐ Notice of Entry of Order

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**NEVADA RULES OF APPELLATE PROCEDURE 3 (a) (3) states:**

"The district court clerk must file appellant's notice of appeal despite perceived deficiencies in the notice, including the failure to pay the district court or Supreme Court filing fee. **The district court clerk shall apprise appellant of the deficiencies in writing,** and shall transmit the notice of appeal to the Supreme Court in accordance with subdivision (e) of this Rule with a notation to the clerk of the Supreme Court setting forth the deficiencies. Despite any deficiencies in the notice of appeal, the clerk of the Supreme Court shall docket the appeal in accordance with Rule 12."

*Please refer to Rule 3 for an explanation of any possible deficiencies.*

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**\*\*Per District Court Administrative Order 2012-01, in regards to civil litigants, "...all Orders to Appear in Forma Pauperis expire one year from the date of issuance." You must reapply for in Forma Pauperis status.**

# Certification of Copy

State of Nevada }  
County of Clark } SS:

I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, does hereby certify that the foregoing is a true, full and correct copy of the hereinafter stated original document(s):

NOTICE OF APPEAL; CASE APPEAL STATEMENT; REQUEST FOR AUTHORIZATION TO PROCEED IN PROPER PERSON; WAIVER OF APPEAL BOND; AND TO TRANSMIT ENTIRE RECORD ON FILE; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; ORDER AFTER HEARING; NOTICE OF ENTRY OF ORDER; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

In the Matter of the Joint Petition for Divorce of:  
KATHLEEN A. KAR and MEHMET SAIT  
KAR,

Case No: D441849  
Dept No: P

Petitioner(s),

now on file and of record in this office.

IN WITNESS THEREOF, I have hereunto  
Set my hand and Affixed the seal of the  
Court at my office, Las Vegas, Nevada  
This 30 day of June 2014.

Steven D. Grierson, Clerk of the Court



Teodora Jones, Deputy Clerk