

IN THE SUPREME COURT OF THE STATE OF NEVADA

WESLEY ALLEN LEWIS,
Appellant(s),

vs.

MARIA DANIELA LEWIS A/K/A MARIA
DANIELA PERDOMO,
Respondent(s),

Case No: D427054

Docket No: 66497

RECORD ON APPEAL VOLUME 5

ATTORNEY FOR APPELLANT
WESLEY LEWIS, PROPER PERSON
4650 IDAHO AVE.
LAS VEGAS, NV 89104

ATTORNEY FOR RESPONDENT
FRANCES-ANN FINE, ESQ.
8975 S. PECOS ROAD, STE. 5
HENDERSON, NV 89074

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

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Wesley Allen Lewis, Defendant.**

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

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CLERK OF THE COURT

1 WESLEY ALLEN LEWIS
2 4650 Idaho Ave.
3 Las Vegas, NV 89104
4 (702) 432-3996
5 Defendant in Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

6 MARIA DANIELA LEWIS,
7 aka MARIA DANIELA PERDOMO
8 Plaintiff,

Case No. D-10-427054-D
Dept No. T

9 vs.

10 WESLEY ALLEN LEWIS,
11 Defendant,

**AFFIDAVIT IN SUPPORT OF MOTION TO PROCEED ON APPEAL
IN FORMA PAUPERIS**

13 STATE OF NEVADA)
14) ss.
15 COUNTY OF CLARK)

16 That WESLEY LEWIS, being first duly sworn, deposes and says:

17 I am the Defendant in the above-entitled case; that in support of my motion to obtain
18 transcripts without cost; that I believe I am entitled to redress; and that the issues which I desire to
19 present on appeal are the following:

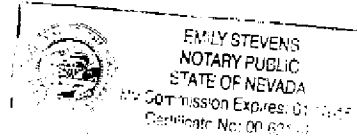
20 Abuse of discretion of District Court Judge in becoming personally involved in the case -
21 stating so on the record - and making orders that are not in the best interest of the child, and that are
22 an abuse of discretion, including ordering Defendant to bear ½ costs of child care, and allowing
23 Respondent to reduce Defendant's time with the child by enrolling her in extracurricular activities
24 and forcing Defendant to bear the cost of transportation in addition to the lost time.

1 I understand that a false statement or answer to any question in this affidavit will subject me
2 to penalties for perjury.

3 
4 WESLEY LEWIS

5 Subscribed and Sworn to
6 before me this 10 day of Nov 2014.

7 
8 NOTARY PUBLIC



**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****May 26, 2011**

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

**May 26, 2011 2:00 PM Case Management
Conference**

HEARD BY: Nathan, Gayle**COURTROOM:** RJC Courtroom 10A**COURT CLERK:** Lucinda Tait**PARTIES:**

Isabella Lewis, Subject Minor, not present
 Maria Lewis, Plaintiff, Counter Defendant, Lidia Rincon, Attorney, present
 present
 Wesley Lewis, Defendant, Counter Claimant, Pro Se
 present

JOURNAL ENTRIES

- CASE MANAGEMENT CONFERENCE

Court congratulated parents on reaching a Parenting Agreement through Family Mediation Center (FMC). PARENTING AGREEMENT EXECUTED and FILED IN OPEN COURT. COURT ORDERED, PARENTING AGREEMENT AFFIRMED and ADOPTED.

Discussion regarding child support and matter moving forward with a possible Prove Up and Divorce today.

COURT stated parents have JOINT PHYSICAL, JOINT LEGAL CUSTODY of minor child. Court reviewed parents Financial Disclosure Forms (FDF) and calculated that father's obligation to mother for CHILD SUPPORT shall be \$440.00 per month, effective June, 2011. Father shall communicate to Counsel which day or day(s) of the month he will pay his ORDERED child support to mother.

Discussion regarding medical insurance for the child which father is currently paying. COURT ORDERED, father shall have an OFFSET for 1/2 of the medical insurance upon proof to Counsel and

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once confirmation is received, that amount shall be entered into the Order.

Attorney Buche addressed the court and advised that just before Court, the father advised him he now has a new job and is making about \$1200.00 less a month than he was previously. COURT stated it BINDS Defendant to the FDF he signed on 5/24/11.

Argument by Counsel regarding mother's income. Court reviewed her FDF and finds mother has two part time jobs.

Following discussion, Parties SWORN and TESTIFIED.

Parties have agreed, Plaintiff shall take her personal property and Defendant shall take his personal property.

Father shall claim the minor child for tax purposes in EVEN years and mother shall claim the minor child for tax purposes in ODD years.

Neither party shall be awarded SPOUSAL SUPPORT.

Each party shall pay their own Attorney fees.

Mother, Maria Daniela Lewis shall have her maiden name restored and shall now be known as MARIA DANIELA PERDOMO.

COURT FINDS, it has personal and subject JURISDICTION and JURISDICTION over the minor child. COURT ORDERED, DIVORCE GRANTED.

Attorney Lidia Rincon to prepare Divorce Decree and have Attorney Ernest Buche review and sign off by 6/17/11. CASE CLOSED upon Entry of Order.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Canceled: September 06, 2013 1:30 PM Motion to Compel

Canceled: May 21, 2014 2:00 PM Order to Show Cause

Canceled: May 22, 2014 9:00 AM Motion

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot Courtroom 05

Nathan, Gayle

Boyle, Kathleen

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Canceled: October 16, 2014 1:30 PM Evidentiary Hearing
Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated
Nathan, Gayle
Courtroom 05
Boyle, Kathleen

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

June 04, 2013

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

June 04, 2013 9:30 AM All Pending Motions

HEARD BY: Nathan, Gayle **COURTROOM:** Courtroom 14

COURT CLERK: Lucinda Tait

PARTIES:

Isabella Lewis, Subject Minor, not present
Maria Lewis, Plaintiff, Counter Defendant, Frances-Ann Fine, Attorney, present
present
Wesley Lewis, Defendant, Counter Claimant, Pro Se
present

JOURNAL ENTRIES

- PLAINTIFF'S MOTION TO HAVE DEFENDANT HELD IN CONTEMPT OF COURT, TO ENFORCE DECREE OF DIVORCE, TO REDUCE CHILD SUPPORT ARREARS TO JUDGMENT AND FOR AWARD OF ATTORNEY FEES...DEFENDANT'S RESPONSE AND COUNTERMOTION FOR ATTORNEY'S FEES AND RELATED RELIEF

Court reviewed the matters at hand and reported she even reviewed the Child Support hearing video.

COURT GRANTED Plaintiff's request for an Order to Show Cause.

Parties STIPULATE that the other parent shall receive at least one phone call from minor child while in the other parent's custody and the cell phone shall travel with the minor child.

Court agrees to construe mother's Motion as a 60B Motion.

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COURT ORDERED: District Attorney's Office to complete a new audit regarding case number R-11-161532-R, with CHILD SUPPORT calculated at \$440.00 per month as Ordered.

Court authorizes the Clerk of the Court to sign off on Child's passport if father refuses to do so.

Mother may only take children to visit in countries that have the HAGUE CONVENTION.

Father to provide a copy of minor child's report card at the Evidentiary hearing.

Child shall have her own bed at each parent's home.

Matter set for EVIDENTIARY HEARING 8/29/13 at 1:30 pm. Both counsel shall file, submit to chambers and exchange their Pre Trial Memorandums and Tabbed Exhibits no later than the close of business, ONE week prior to the Hearing. Witness lists shall be filed and exchanged no later than the close of business, 6/14/13. Discovery shall conclude by the close of business, FIFTEEN days prior to the hearing. Failure to disclose any witnesses and/or provide the Court with tabbed exhibits will result in them not being permitted at the time of the Hearing.

****A copy of this MINUTE ORDER was forwarded to the District Attorney's office regarding their case number R-11-161532-R by court clerk/**ct**

INTERIM CONDITIONS:

FUTURE HEARINGS:

Canceled: September 06, 2013 1:30 PM Motion to Compel

Canceled: May 21, 2014 2:00 PM Order to Show Cause

Canceled: May 22, 2014 9:00 AM Motion

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot Courtroom 05

Nathan, Gayle

Boyle, Kathleen

Canceled: October 16, 2014 1:30 PM Evidentiary Hearing

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated

Nathan, Gayle

Courtroom 05

Boyle, Kathleen

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****August 09, 2013**

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

August 09, 2013 1:30 PM Motion to Compel

HEARD BY: Beecroft, Chris A, Jr.; Beecroft, Chris **COURTROOM:** Courtroom 13
A, Jr.

COURT CLERK: Amy Lunsford

PARTIES:

Isabella Lewis, Subject Minor, not present
Maria Lewis, Plaintiff, Counter Defendant, not present Frances-Ann Fine, Attorney, present
Wesley Lewis, Defendant, Counter Claimant, Pro Se
not present

JOURNAL ENTRIES

- PLAINTIFF'S MOTION TO COMPEL DISCOVERY RESPONSES AND FOR AWARD OF ATTORNEY'S FEES AND EX PARTE APPLICATION FOR AN ORDER SHORTENING TIME

COURT NOTED no opposition was filed. Attorney Marr indicated that she only received the Motion yesterday and had no opportunity to respond. Arguments by Counsel as to the notice of the Motion and the notice provided outlining the deficiencies in the discovery responses.

COMMISSIONER RECOMMENDED:

1. Plaintiff's Motion to Compel is GRANTED; the relief as set forth in Attorney Fine's July 24th letter is GRANTED;
2. Defendant shall provide SUPPLEMENTAL RESPONSES to all Interrogatories and Requests to Plaintiff prior to the close of business, August 16, 2013;

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3. Decision on Plaintiff's request for ATTORNEY'S FEES shall be deferred to the District Court Judge.

Attorney Fine shall prepare a Report and Recommendation; Attorney Marr to countersign.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Canceled: September 06, 2013 1:30 PM Motion to Compel

Canceled: May 21, 2014 2:00 PM Order to Show Cause

Canceled: May 22, 2014 9:00 AM Motion

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot
Courtroom 05*

Nathan, Gayle

Boyle, Kathleen

Canceled: October 16, 2014 1:30 PM Evidentiary Hearing

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated
Nathan, Gayle*

Courtroom 05

Boyle, Kathleen

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****August 29, 2013**

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

August 29, 2013 1:30 PM All Pending Motions

HEARD BY: Nathan, Gayle **COURTROOM:** Courtroom 14

COURT CLERK: Neida Parker

PARTIES:

Isabella Lewis, Subject Minor, not present
Maria Lewis, Plaintiff, Counter Defendant, Frances-Ann Fine, Attorney, present
present
Wesley Lewis, Defendant, Counter Claimant, Pro Se
present

JOURNAL ENTRIES

- EVIDENTIARY HEARING: RE: CHILD SUPPORT...ORDER TO SHOW CAUSE

COURT NOTED, the three (3) issues are the correct Child Support amount, arrears, and how much the District Attorney's office has collected and applied towards Defendant's Child Support amount.

Arguments by counsel regarding whether testimony should or should not be heard, contempt issues, whether Defendant willfully refused to pay child support, and Plaintiff incurring the cell phone bill expense that Defendant had originally bought.

Attorney Fine requested to INVOKE the EXCLUSIONARY RULE. COURT SO ORDERED.

COURT NOTED, an Order to Show Cause was issued.

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Arguments by counsel regarding extra curriculum activities.

Testimony and exhibits presented (see worksheets); both Counsel STIPULATED to Defendant's Exhibits A, B, C, E, F, H, K, M, and R.

Matter TRAILED at the request of Attorney Marr. Matter RECALLED with a sidebar at the request of Attorney Marr.

Both Counsel also STIPULATED to Plaintiff's Exhibits 6, 15, 16,17, 21, and 24.

Due to the power outage, COURT ORDERED, matter CONTINUED. The Department's Judicial Executive Assistance (JEA) shall contact both counsel regarding setting a continuance date.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Canceled: September 06, 2013 1:30 PM Motion to Compel

Canceled: May 21, 2014 2:00 PM Order to Show Cause

Canceled: May 22, 2014 9:00 AM Motion

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot

Courtroom 05

Nathan, Gayle

Boyle, Kathleen

Canceled: October 16, 2014 1:30 PM Evidentiary Hearing

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated

Nathan, Gayle

Courtroom 05

Boyle, Kathleen

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****October 08, 2013**

D-10-427054-D Maria Daniela Lewis, Plaintiff
 vs.
 Wesley Allen Lewis, Defendant.

October 08, 2013 10:30 AM Evidentiary Hearing

HEARD BY: Nathan, Gayle**COURTROOM:** Courtroom 14**COURT CLERK:** Kathleen Boyle**PARTIES:**

Isabella Lewis, Subject Minor, not present
 Maria Lewis, Plaintiff, Counter Defendant, Frances-Ann Fine, Attorney, present
 present
 Wesley Lewis, Defendant, Counter Claimant, Pro Se
 present

JOURNAL ENTRIES

- The Court noted this matter had been continued from 8/29/13, and the issues to be resolved were child support and child support arrearages.

The Court heard continued testimony from Plaintiff and Defendant.

Exhibits offered and admitted. (See worksheets).

The Court FINDS exhibit 16 is not consistent with the testimony presented.

Exhibit 22 was admitted only for the purpose of establishing that Plaintiff paid Ms. Flores for eight (8) tutoring sessions.

Closing arguments.

COURT ORDERED, the following:

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1. This matter shall be taken UNDER ADVISEMENT.
2. Defendant shall take the minor child to Kumon Tutoring on Mondays after school.

Discussion regarding Defendant's Motion to Modify, filed in August, 2012.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Canceled: May 21, 2014 2:00 PM Order to Show Cause

Canceled: May 22, 2014 9:00 AM Motion

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot
Courtroom 05*

Nathan, Gayle

Boyle, Kathleen

Canceled: October 16, 2014 1:30 PM Evidentiary Hearing

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated

Nathan, Gayle

Courtroom 05

Boyle, Kathleen

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****October 14, 2013**

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

October 14, 2013 10:00 AM Minute Order

HEARD BY: Nathan, Gayle**COURTROOM:** Courtroom 14**COURT CLERK:** Lucinda Tait**PARTIES:**

Isabella Lewis, Subject Minor, not present

Maria Lewis, Plaintiff, Counter Defendant, not present Frances-Ann Fine, Attorney, not present

Wesley Lewis, Defendant, Counter Claimant, Pro Se
not present

JOURNAL ENTRIES

- MINUTE ORDER RE: FINDINGS AND ORDER AFTER EVIDENTIARY HEARING

This matter came before the Court on Plaintiff's Order to Show Cause on August 28, 2013 which was continued to October 8, 2013 because of a power outage that impacted the video recording system; On both dates, Plaintiff was present and represented by Frances-Ann Fine, Esq.; Defendant was present and represented by Patricia Marrs, Esq.; the Court heard testimony and took evidence and makes the following FINDINGS and ORDER:

1. The Court has personal and subject matter in this post-decree matter;
2. On October 8, 2013, the Court found that Exhibit 16 was not consistent with the testimony presented so no weight was given to that exhibit; Exhibit 22 was admitted only for the purpose of establishing that Plaintiff paid Ms. Flores for eight tutoring sessions; The Court ORDERED that Defendant take the minor child Isabella Lewis (Bella), dob 8/10/2006 to the Kuman Tutoring Class that is paid for by mom on Mondays immediately after school; the Court finds this to be in Bella's best interest.
3. The Court had previously set aside the Master's Recommendation and Order under R-11161532-R

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as the arrears set by that Court did not accurately reflect the correct arrears based upon the child support that was ordered to be paid, to wit, the sum of \$440 for all but three months as the Defendant father failed to maintain the medical insurance for the minor child; As Welfare is on this case the Court ORDERS that the District Attorney's Office shall make a new Judgment consistent with this Order, to wit, that Defendant was ordered to pay \$440 monthly in child support; he was afforded an offset of \$133.00 for insurance, thus his child support for the months of June 2011; July 2011 and August 2011, ONLY is set at \$307 per month; and that the TOTAL ARREARS up to and including August 2013 is \$9012.38 with interest and penalty. For each and every month thereafter his child support is set at \$440 per month through August, 2013.

4. The Court finds that the Defendant's testimony that he is working only 26 hours per week so that he can care for Bella on his days off is not compelling to the Court as Bella is now in her second year of elementary school (albeit repeating the first grade). There was no testimony that Defendant was physically or mentally impaired or disabled or unable to work. The Court finds that the Defendant has a duty to financially support his daughter by working a full time job as the Mother of his child does and it was apparent from the testimony and evidence that he does not meet his financial obligations on 26 hours per week; the Court accepts the Plaintiff's testimony that she has, at times, worked three jobs to support herself and Bella. The Court finds that, based upon the Defendant's continuing failure since 2011 to pay his Court Ordered Child Support on a consistent monthly basis, that 26 hours of work per week is not sufficient to meet the financial needs of his child. The Court declines to set aside the Child Support Order of 2011 that set the child support at \$440 or to make this Order retroactive to August 2012 when he made application to have his Child Support reviewed in Child Support Court. See below on Credibility.

5. Whether Defendant chooses to work 40 hours is up to him, however, the Court finds that he is willfully underemployed and is imputing another 16 hours of wages at this time; A review of the Defendant's paystubs reflects that he is paid an hourly wage of \$9 per hour and is paid commission as well. Although his July and August 2013 paystubs do not reflect commission, his May 2013 paystubs reflect commission; Additionally, on the Pay Stub for Pay Date 8/2/2013 his year to date for commissions was \$3069; for 7 months that is \$438.42 per month in income for commissions; this could be looked at in several ways, even breaking down to an increased hourly amount to calculate income on, however the Court will calculate 40 hours per week at \$9 per hour for a gross monthly of \$1560; adding in \$438 in average commissions, his gross monthly is set at \$1998 per month.

6. Plaintiff's income is \$1495 per month; 18% of that is \$269.00. Defendant's income is \$1998 per month; 18% of that is \$360.00. The difference is \$91.00 with Defendant the obligor.

Additionally, Plaintiff maintains insurance for the minor child at a cost to her of \$100 per month. Defendant is ordered to pay one half of that, increasing his child support to \$141.00 per month.

7. On ARREARS: Once the District Attorneys Office has calculated arrears based upon paragraph 3, to which interest and penalties must be calculated; Defendant shall pay the sum of \$100 on the arrears until said sum is paid in full.

8. Therefore, Defendant's Child Support Obligation, with insurance and a payment on Arrears is a total of \$241 per month commencing October 2013. Until the full amount is deducted from his paycheck the Defendant is responsible for paying the Plaintiff the full amount each and every month; In October the full amount is due to Plaintiff by October 31, 2013; in November he may pay \$120.50 on the 5th of the month and \$120.50 on the 20th of the month, and every month thereafter until there

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is a wage assignment in place for the full amount. Failure to make any one payment is a Contempt of Court and Plaintiff may submit an Order to Show Cause with a supporting Affidavit/Declaration detailing the missed payment(s) to obtain an evidentiary hearing re contempt.

9. On the issue of CREDIBILITY ; the Defendant testified on several issues where the Court found his credibility suspect, or that he was motivated to act in a manner that was contrary to the best interest of his minor child;

A. Defendant testified that his current income was \$900 per month; the Court found his income to be, at a minimum \$1481 per month, when looking at the year to date on his paystubs (noting that the calculation used to set child support uses his hourly on 40 hours and a sum that is equal to his average monthly commission as his gross monthly). The Court finds that his testimony, on his gross monthly income was not credible as it was not supported by the math in an analysis of his paystubs.

B. Defendant testified that Plaintiff moved in with someone he didn't know which "affected" him and that it was hard for him to handle; the Court finds that he was motivated to not cooperate or co-parent or pay his child support based upon his feelings toward this third party and Plaintiff's new relationship.

C. The Court did not find Defendant credible that he sits down for 2 hours every day to go over his first grade daughter's homework with her.

D. The Court did not find Defendant credible when he testified that he did not know Bella was in gymnastics classes or mini-cheer; it defies the Court's understanding of children that Bella did not want to show off her tumbling and cheer skills to her daddy; additionally, he testified that he was asked to buy cheer shoes for Bella and he declined to do so. He was invited to events involving cheer/gymnastics but did not attend. All of this testimony underlined his credibility.

10. The Court has concerns about co-parenting issues that were not before it; these include Defendant not charging Bella's telephone so that Plaintiff has daily access to her daughter; not bringing Bella to Kumon Tutoring that Plaintiff is paying \$200 per month for; ignoring the activities that Plaintiff has Bella involved in and not sharing the activities he has Bella involved in with Plaintiff. Defendant is cautioned to actively engage in co-parenting with Plaintiff.

CONTINUED (see page 2)...

INTERIM CONDITIONS:

FUTURE HEARINGS:

Canceled: May 21, 2014 2:00 PM Order to Show Cause

Canceled: May 22, 2014 9:00 AM Motion

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot Courtroom 05

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Nathan, Gayle
Boyle, Kathleen

Canceled: October 16, 2014 1:30 PM Evidentiary Hearing
Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated
Nathan, Gayle
Courtroom 05
Boyle, Kathleen

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****October 14, 2013**

D-10-427054-D Maria Daniela Lewis, Plaintiff
 vs.
 Wesley Allen Lewis, Defendant.

October 14, 2013 10:00 AM Minute Order

HEARD BY: Nathan, Gayle**COURTROOM:** Courtroom 14**COURT CLERK:** Lucinda Tait**PARTIES:**

Isabella Lewis, Subject Minor, not present

Maria Lewis, Plaintiff, Counter Defendant, not present Frances-Ann Fine, Attorney, not present

Wesley Lewis, Defendant, Counter Claimant, Pro Se
 not present

JOURNAL ENTRIES

- MINUTE ORDER RE: FINDINGS AND ORDER FROM EVIDENTIARY HEARING
 (CONTINUED...PART 2)

11. The Court finds that Defendant has lived with his parents since August of 2012, hence he has built in daycare, when needed. Additionally, his rent is listed at \$300 per month; the Court infers that it is unlikely he would be evicted if he was late or missed a rent payment. The Court finds that Defendant's monthly expenses are minimal.

12. The Court finds that Defendant is in contempt for his non-payment of child support as follows: In 2011; for June, July, August, September ; In 2012 for January , May, June, July, September, October and November.

13. For his contempt the Defendant is sanctioned the sum of \$500 for each and every missed payment as set forth above, for a total sanction of $11 \times \$500 = \5500 . Said sum is herein reduced to Judgment and may be collected by any and all lawful means. The Court is also imposing a 10 day jail sentence for each of the 11 contempt s for a total sentence of 110 days; said jail sentence is stayed ; jail will be imposed on any future missed payments.

14. Additionally, the Court finds that Defendant is responsible for some if not all of Plaintiff s

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attorney fees. While the Court finds that both counsel meet the Brunzell factors as set forth in that case and applied herein, the Plaintiff has met her burden and established contempt. Ms. Fine will draft the final Order and forward it to Ms. Marrs for approval and signature and Ms. Fine will submit a Memorandum of Fees and Costs for the Court to review in determining an attorney award.

15. The Court finds it is in Bella's best interest, and an appropriate expense under NRS 125B.080(k) that both parties share in the cost of Bella's tutoring as she is currently being serviced through Kuman Tutoring; as Plaintiff has paid for October, 2013, Defendant is ORDERED to pay for November's tutoring, in FULL by the due date for November; failure to pay will be a contempt of Court and Plaintiff may submit an Order to Show Cause with a supporting Affidavit/Declaration detailing the missed payment(s) to obtain an evidentiary hearing re contempt. Thereafter the parties will equally share the cost, paying on the due date so there is no break in the delivery of tutoring services. Bella will continue to receive tutoring services until she is testing at or above grade level as tested by Kunam, or if they do not test by the CRT's administered by CCSD, or the parents mutually decide to terminate the service. If she is testing at or above grade level and one parent wishes to continue the tutoring, that will be at that parent's expense. If she needs tutoring again in the future, based upon her grades or a teacher recommendation, this ORDER stands; to wit, the cost will be equally borne.

16. The Court declines to award any costs the Plaintiff has borne in the past for extra curricular activities or the cell phone; the Court is denying the request they equally bear the cost of gymnastics and cheer or any other recreational activity.

17. Other than the tutoring the Parties are ORDERED not to enroll the child in an activity during the other parent's timeshare without that parents WRITTEN AGREEMENT to the activity.

IT IS SO ORDERED.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Canceled: May 21, 2014 2:00 PM Order to Show Cause

Canceled: May 22, 2014 9:00 AM Motion

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot Courtroom 05

Nathan, Gayle

Boyle, Kathleen

Canceled: October 16, 2014 1:30 PM Evidentiary Hearing

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated

Nathan, Gayle

Courtroom 05

Boyle, Kathleen

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****May 01, 2014**

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

May 01, 2014 9:30 AM All Pending Motions

HEARD BY: Nathan, Gayle**COURTROOM:** Courtroom 05**COURT CLERK:** Kathleen Boyle**PARTIES:**

Isabella Lewis, Subject Minor, not present
Maria Lewis, Plaintiff, Counter Defendant, Frances-Ann Fine, Attorney, present
present
Wesley Lewis, Defendant, Counter Claimant, Pro Se
present

JOURNAL ENTRIES

- MOTION TO MODIFY CUSTODY; TO ENFORCE ORDER OF DECEMBER 27, 2013 AND AN AWARD OF ATTORNEY FEES...OPPOSITION TO MOTION TO MODIFY CUSTODY AND DEFENDANT'S COUNTERMOTION FOR FEES; TO ORDER THERAPY FOR PLAINTIFF; TO HOLD PLAINTIFF IN CONTEMPT; AND FOR RELATED RELIEF

Patricia Marr, Bar #8846, appeared in an unbundled capacity to represent Defendant.

The Court reviewed its notes on the case, and FINDS Plaintiff has established adequate cause for the Court to set an Evidentiary Hearing. The Court reviewed the allegations made by Plaintiff.

Ms. Marr advised the Court she had filed a Motion to Withdraw on an Order Shortening Time; however, she was still served with the Motion. Ms. Marr said she had reviewed the paperwork and noted Defendant was more laid back than Plaintiff with regard to the treatment of the minor child. Ms. Marr asked the Court to review the emails from Plaintiff to Defendant at the time of the

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Evidentiary Hearing. Defendant said he met with Warren Wheatley on 4/1/14.

Response by Ms. Fine.

Ms. Marr tendered a money gram in the amount of \$84.50 to Plaintiff IN OPEN COURT.

COURT ORDERED, the following:

1. An Evidentiary Hearing will be conducted on 7/29/14 and 8/5/14 at 1:30 p.m., to determine custody. The standard is best interest of the minor child.
2. Pre-trial Memorandums and tabbed exhibits will be presented one week prior to the 7/29/14 trial date.
3. Initial witness lists will be submitted by 5/12/14, and supplemented thereafter.
4. Discovery will close thirty (30) days prior to the first day of trial.
5. The Court's Judicial Executive Assistant will prepare a Trial Management Order.
6. The Order to Show Cause will be heard on 7/29/14, and the 5/21/14 order shall be VACATED.
7. The minor child shall remain in counseling until the mental health professional deems it is no longer helpful to the child, and therefore, the parents may not remove her from counseling.
8. The attorney fees previously awarded to Ms. Fine, shall be REDUCED TO JUDGMENT subject to any offsets for payments made.
9. TEMPORARILY until the Evidentiary Hearing Defendant's timeshare will be modified to commence on Monday after school through Wednesday at 6:00 p.m. while school is in session. When school is out of session, the timeshare will commence on Monday at 9:00 a.m. and conclude on Wednesday at 6:00 p.m.
10. If there are any medical episodes, Defendant shall obtain written instructions from the physician, and if there is evidence he is not following the medical protocol, this matter can be placed on calendar and the Court will hear it for further orders.
11. If the allegations against Defendant are proved, Plaintiff will be awarded primary custody of the minor child. The standard is best interest of the child.
11. Ms. Marr's Motion to Withdraw as Attorney of Record is GRANTED. Ms. Marr shall submit the Order.

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12. Ms. Fine shall prepare the Order.

7/29/14 1:30 P.M. EVIDENTIARY HEARING: CUSTODY

7/29/14 1:30 P.M. ORDER TO SHOW CAUSE

8/5/14 1:30 P.M. EVIDENTIARY HEARING: CUSTODY (DAY 2)

INTERIM CONDITIONS:

FUTURE HEARINGS:

Canceled: May 21, 2014 2:00 PM Order to Show Cause

Canceled: May 22, 2014 9:00 AM Motion

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot
Courtroom 05*

Nathan, Gayle

Boyle, Kathleen

Canceled: October 16, 2014 1:30 PM Evidentiary Hearing

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated

Nathan, Gayle

Courtroom 05

Boyle, Kathleen

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****July 29, 2014**

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

July 29, 2014 1:30 PM All Pending Motions

HEARD BY: Nathan, Gayle**COURTROOM:** Courtroom 05**COURT CLERK:** Kathleen Boyle**PARTIES:**

Isabella Lewis, Subject Minor, not present
 Maria Lewis, Plaintiff, Counter Defendant, Frances-Ann Fine, Attorney, present
 present
 Wesley Lewis, Defendant, Counter Claimant, Pro Se
 present

JOURNAL ENTRIES

- EVIDENTIARY HEARING: DAY 1 - CUSTODY...ORDER TO SHOW CAUSE

EXCLUSIONARY RULE INVOKED BY MS. FINE.

Parties SWORN and TESTIFIED.

The Court noted Ms. Fine was requesting relief, since Defendant had failed to participate in Discovery. Counsel requested Defendant's pleadings be stricken. Defendant said he had responded to the production requests, and produced copies of the documents he had mailed to Ms. Fine on 6/26/14.

Testimony presented. Exhibits offered and admitted. (See worksheets).

COURT ORDERED, the Opposition to the Notice of Entry of Order and Order filed on 7/2/2014 is deemed to be a FUGITIVE DOCUMENT, since it was not authorized and it shall be STRICKEN. Plaintiff's request to deem the admissions admitted is GRANTED. Defendant shall produce the email

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he disclosed in his testimony, with regard to the end of the skin treatment for the minor child, at the 8/5/14 hearing. This matter shall be CONTINUED to 8/5/14 at 1:30 p.m.

INTERIM CONDITIONS:

FUTURE HEARINGS:

*Canceled: October 16, 2014 1:30 PM Evidentiary Hearing
Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated
Nathan, Gayle
Courtroom 05
Boyle, Kathleen*

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****August 05, 2014**

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

August 05, 2014 1:30 PM All Pending Motions

HEARD BY: Nathan, Gayle**COURTROOM:** Courtroom 05**COURT CLERK:** Kathleen Boyle**PARTIES:**

Isabella Lewis, Subject Minor, not present
Maria Lewis, Plaintiff, Counter Defendant, Frances-Ann Fine, Attorney, present
present
Wesley Lewis, Defendant, Counter Claimant, Pro Se
present

JOURNAL ENTRIES

- EVIDENTIARY HEARING - CUSTODY ORDER TO SHOW CAUSE: ORDER TO SHOW CAUSE (DAY 2)

Testimony presented.

Exhibits offered and admitted. (See worksheets).

The Court advised Defendant he could not admit exhibits, which had not been disclosed during Discovery.

Closing arguments.

The COURT made its FINDINGS and ORDERED, the following:

1. Defendant's 7/18/14 Motion to Declare Item or Material Obscene and Obtain Injunction for Dismissal shall be STRICKEN as a FUGITIVE DOCUMENT.

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2. In October, 2013 Defendant had child support arrearages amounting to \$9,012.38. The Court also ordered Defendant to pay half of the cost of the child's medical insurance, and made a finding he was not credible. The Court did not find Defendant to be credible when he testified he spent two hours with the child going over her homework. The Court also had concerns about him not charging the child's phone so Mom could have daily access to the child. The emails attached as an exhibit by Plaintiff confirmed she was unable to have daily contact with the minor child. The Court was also concerned at the 10/13/13 hearing the Defendant was not taking the child for her tutoring at Kumon, after school, and the Court FOUND Defendant to be in CONTEMPT for failing to take the minor child to her tutoring classes. In addition, the Court FOUND Defendant to be in CONTEMPT in October 2013, for his failure to pay his child support in June, July, August, and September of 2011, and January, May, June, July, August, September, October, and November, in 2012. Defendant is also in CONTEMPT for failing to pay his child support in October, November, December and January, in compliance with the Court's November order. In addition, Defendant is in CONTEMPT for not paying half of the tuition for Kumon, from November to July in the amount of \$1,000.00, and for failing to take the child to her tutoring classes during the summer. Therefore, the amounts set forth in the two Schedules of Arrearages (exhibits 17 and 18), which included child support arrearages in the amount of \$14,535.35, shall be REDUCED TO JUDGMENT.

3. Defendant shall be responsible for half of Mr. Wheatley's bill, in the amount of \$950.00, which shall be REDUCED TO JUDGMENT.

4. For failing to bring the minor child to tutoring on Mondays during his custodial time, the Court FINDS Defendant to be in CONTEMPT of Court, and he is SANCTIONED to twenty (20) days in the Clark County Detention Center, which shall be STAYED.

5. For each of the missed child support payments for December, January, and February Defendant is SANCTIONED to twenty (20) days in the Clark County Detention Center, totaling sixty (60) days, which shall be STAYED.

6. In the future, if Defendant fails to follow the Orders of the Court, and the matter comes back before the Court on an Order to Show Cause, the stayed jail time will be IMPOSED by the Court.

7. As to the timeshare, the Court FINDS based on Defendant's conduct over the past ten (10) months, it is in the best interest of the minor child for the Court to change the custodial arrangement; therefore, going forward Defendant's timeshare will be every other Friday from after school to Sunday at 5:00 p.m., when she will be picked up by Plaintiff. Defendant shall make sure the child is ready to leave with Plaintiff at 5:00 p.m. Defendant shall make sure all of the papers in the child's back pack remain in the back pack so Plaintiff has a chance to look at the papers when the child is returned. In addition, Defendant shall have dinner with the minor child on Mondays and Tuesdays every week from after school until 7:00 p.m., when Plaintiff will pick up the child from Defendant's residence.

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8. The current holiday schedule shall remain AS IS.
9. Plaintiff shall have telephone contact with the minor child while she is with Defendant on weekends, and Defendant shall have telephone contact with the minor child every evening at 7:00 p.m., with the exception of Mondays and Tuesdays.
10. Based on 18% of his gross monthly income of \$1,998.00, Defendant's child support shall be SET at \$360.00 per month, effective August, 2014.
11. Medical insurance for the minor child shall be continued to be provided as per the Court's previous order.
12. Ms. Fine shall prepare the Order, which shall include findings.

INTERIM CONDITIONS:

FUTURE HEARINGS:

*Canceled: October 16, 2014 1:30 PM Evidentiary Hearing
Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated
Nathan, Gayle
Courtroom 05
Boyle, Kathleen*

PRINT DATE:	02/19/2015	Page 25 of 27	Minutes Date:	May 26, 2011
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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****August 28, 2014**

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

August 28, 2014 11:30 AM Minute Order

HEARD BY: Nathan, Gayle**COURTROOM:** Courtroom 05**COURT CLERK:** Kathleen Boyle**PARTIES:**

Isabella Lewis, Subject Minor, not present

Maria Lewis, Plaintiff, Counter Defendant, not present Frances-Ann Fine, Attorney, not present

Wesley Lewis, Defendant, Counter Claimant, Pro Se
not present

JOURNAL ENTRIES

- An Evidentiary Hearing was conducted in this case on August 5, 2014, wherein the Court ordered Defendant's visitation with the minor child would include a dinner date with the child on Mondays and Tuesdays every week, from after school until 7:00 p.m. To FURTHER CLARIFY the Court's order, in the event the minor child has an extra-curricular activity scheduled during Defendant's visitation on Monday and Tuesday evenings, he shall be responsible for transporting the minor child to and from the scheduled activity.

The child's Monday tutoring classes at Kumon were discussed at the Evidentiary Hearing on August 5, 2014, and Defendant was found to be in CONTEMPT for failing to take the child to Kumon for her tutoring classes, and for failing to pay his share of the tuition fees. The minor child is still scheduled to attend tutoring classes at Kumon after school on Mondays; therefore, it is Defendant's responsibility to make sure she gets to her tutoring classes, and to any other scheduled after school activity during his timeshare. If Defendant fails to take the minor child to her tutoring classes at Kumon, or to any other scheduled after school activity which occurs during his visitation time, his Monday visitation with the minor child shall be VACATED.

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Minutes Date:

May 26, 2011

Defendant shall continue to be responsible for one half the cost of tutoring; he shall pay for Monday's sessions when he brings the minor child. Said tutoring shall continue until KUMON finds that the child is testing at grade level.

The Plaintiff's Motion for Clarification filed on 8/26/14 has been resolved with this minute order. Plaintiff shall prepare an Order for the Court's signature.

IT IS SO ORDERED.

CLERK'S NOTE: A copy of the Minute Order was faxed to Ms. Fine's office, and a copy was mailed to Defendant. KB 8/29/14

INTERIM CONDITIONS:

FUTURE HEARINGS:

*Canceled: October 16, 2014 1:30 PM Evidentiary Hearing
Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated
Nathan, Gayle
Courtroom 05
Boyle, Kathleen*

PRINT DATE:	02/19/2015	Page 27 of 27	Minutes Date:	May 26, 2011
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Certification of Copy and Transmittal of Record

State of Nevada }
County of Clark } SS:

Pursuant to the Supreme Court order dated February 13, 2015, I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, do hereby certify that the foregoing is a true, full and correct copy of the complete trial court record for the case referenced below. The record comprises five volumes with pages numbered 1 through 949.

MARIA DANIELA LEWIS nka MARIA
DANIELA PERDOMO,

Plaintiff(s),

vs.

WESLEY ALLEN LEWIS,

Defendant(s),

Case No: D427054

Dept. No: T

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 19 day of February 2015.

Steven D. Grierson, Clerk of the Court



Teodora Jones, Deputy Clerk

IN THE SUPREME COURT OF THE STATE OF NEVADA

WESLEY ALLEN LEWIS,
Appellant(s),

vs.

MARIA DANIELA LEWIS A/K/A MARIA
DANIELA PERDOMO,
Respondent(s),

Case No: D427054

Docket No: 66497

RECORD ON APPEAL VOLUME 4

ATTORNEY FOR APPELLANT
WESLEY LEWIS, PROPER PERSON
4650 IDAHO AVE.
LAS VEGAS, NV 89104

ATTORNEY FOR RESPONDENT
FRANCES-ANN FINE, ESQ.
8975 S. PECOS ROAD, STE. 5
HENDERSON, NV 89074

I N D E X

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

I N D E X

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5	11/12/2014	AFFIDAVIT IN SUPPORT OF MOTION TO PROCEED ON APPEAL IN FORMA PAUPERIS	921 - 922
4	07/22/2014	AFFIDAVIT IN SUPPORT OF ORDER EXTENDING TIME TO ANSWER	821 - 842
1	03/18/2010	AFFIDAVIT OF RESIDENT WITNESS	7 - 8
1	03/31/2010	AFFIDAVIT OF RESIDENT WITNESS	11 - 12
1	03/31/2010	AFFIDAVIT OF SERVICE	9 - 10
4	09/23/2014	AMENDED NOTICE OF APPEAL	916 - 917
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4	07/22/2014	CERTIFICATE OF MAILING	847 - 848
4	07/23/2014	CERTIFICATE OF MAILING	875 - 875

**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

I N D E X

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3	04/15/2014	CERTIFICATE OF SERVICE	652 - 653
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1	03/18/2010	COMPLAINT FOR DIVORCE	1 - 6
1	06/22/2011	CONFIDENTIAL FAMILY COURT INFORMATION SHEET (UNFILED)	80 - 80
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2	09/17/2013	DISCOVER COMMISSIONER'S REPORT AND RECOMMENDED ORDER	365 - 368
4	06/26/2014	DISCOVERY	708 - 786
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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

I N D E X

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3	03/19/2014	MOTION TO MODIFY CUSTODY; TO ENFORCE ORDER OF DECEMBER 27, 2013 AND AN AWARD OF ATTORNEY'S FEES	532 - 631
3	04/09/2014	MOTION TO WITHDRAW AS ATTORNEY FOR DEFENDANT ON ORDER SHORTENING TIME	642 - 649
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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

I N D E X

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3	04/24/2014	OPPOSITION TO MOTION TO MODIFY CUSTODY, TO ENFORCE ORDER OF DECEMBER 27, 2013 AND AN AWARD OF ATTORNEY;S FEES AND COUNTERMOTION FOR FEES; TO ORDER THERAPY FOR PLAINTIFF; TO HOLD PLAINTIFF IN CONTEMPT; AND FOR RELATED RELIEF	654 - 685
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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

I N D E X

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2	08/22/2013	PLAINTIFF'S PRE-EVIDENTIARY HEARING BRIEF	346 - 353
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3	04/28/2014	PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO MOTION TO MODIFY CUSTODY; TO ENFORCE ORDER OF DECEMBER 27, 2013 AND AN AWARD OF ATTORNEY'S FEES AND COUNTERMOTION FOR FEES; TO ORDER THERAPY FOR PLAINTIFF; TO HOLD PLAINTIFF IN CONTEMPT AND FOR RELATED RELIEF (CONTINUED)	686 - 690
4	04/28/2014	PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO MOTION TO MODIFY CUSTODY; TO ENFORCE ORDER OF DECEMBER 27, 2013 AND AN AWARD OF ATTORNEY'S FEES AND COUNTERMOTION FOR FEES; TO ORDER THERAPY FOR PLAINTIFF; TO HOLD PLAINTIFF IN CONTEMPT AND FOR RELATED RELIEF (CONTINUATION)	691 - 692

**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

I N D E X

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1	04/19/2010	REPLY TO DEFENDANT'S ANSWER AND COUNTERCLAIM FOR DIVORCE	27 - 28
4	09/09/2014	REQUEST FOR AUTHORIZATION TO PROCEED IN PROPER PERSON; WAIVER OF APPEAL BOND; AND TO TRANSMIT ENTIRE RECORD ON FILE	907 - 907
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1	11/29/2010	STATEMENT OF LEGAL AID REPRESENTATION AND FEE WAIVER (PURSUANT TO NRS 12.015)	41 - 41
1	03/31/2010	SUMMONS	14 - 14
2	05/31/2013	SUPPLEMENTAL CERTIFICATE OF SERVICE	241 - 242
4	09/04/2014	SUPPLEMENTAL ORDER	902 - 904

1 home. When MARIA asked him why he had not contacted MARIA so she
2 could take her to school, it was WESLEY who began yelling until the
3 police officers caused him to stop. They impressed upon WESLEY
4 that in the future the parties need to speak with one another in
5 order to avoid this type of situation.

6 As can be seen, MARIA made no threats to remove ISABELLA
7 from WESLEY's custody on February 26, 2014 or any other time.
8 ISABELLA was calm throughout the incident. WESLEY has taken a
9 minor incident that he caused and then magnified it and lied about
10 it in an effort to attack MARIA and defend his own failings as a
11 responsible co-parent.


12 IV. ARGUMENT

13 WESLEY has a track record with which this Court is
14 familiar after presiding out last year's Evidentiary Hearing.
15 While enjoying the benefits of being a parent, he avoids the
16 responsibilities that are an equal part of the package. He will
17 not financially support his child, properly attend to her health
18 care needs, take part in and support her educational development,
19 or co-parent. If it is work that must be done, then WESLEY cannot
20 be bothered.

21 WESLEY is not without abilities. He can make a good
22 living in sales, but it is easier to just live in his parents' home
23 rather than put forth the effort to be successful. He takes the
24 same approach with his daughter. MARIA's motion provides
25 supporting documentation evidencing the allegations and arguments
26 she presents. With WESLEY, all he provides to this Court are
27 transparent last-minute efforts to appear as if he is a responsible
28 parent and obvious and unsupported lies attacking MARIA.

1 Based upon the foregoing, it is respectfully submitted
2 that MARIA's motion be granted in its entirety. Conversely,
3 WESLEY's countermotion should be summarily denied either as a
4 fugitive document or on its lack of merit.

5 DATED this 28 day of April, 2014.

6
7 
8 The Fine & Price Law Group
9 FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
Attorney for Plaintiff
MARIA DANIELA PERDOMO

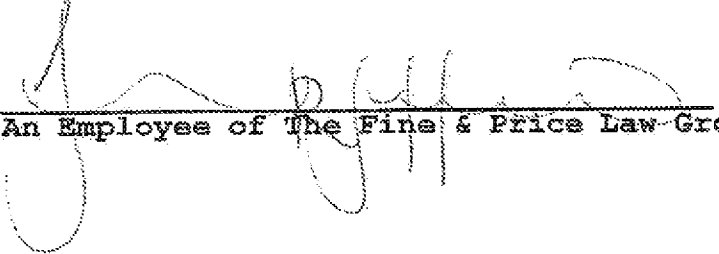
10 CERTIFICATE OF SERVICE

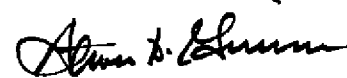
11 I HEREBY CERTIFY that on the 28th day of April, 2014,
12 service of the foregoing Plaintiff's Reply To Defendant's
13 Opposition And Countermotion was made by placing a copy of same
14 into the United States Mail, first class postage prepaid, at
15 Henderson, Nevada, addressed to:

16 Patricia A. Marr, Esq.
17 4305 Dean Martin Dr., Ste. 185
18 Las Vegas, Nevada 89103

19 and

20 Wesley Allen Lewis
21 4650 Idaho Avenue
22 Las Vegas, Nevada 89104

23 
24 An Employee of The Fine & Price Law Group
25
26
27
28



CLERK OF THE COURT

ORD
PATRICIA A. MARR, LTD.
PATRICIA A. MARR, ESQ.
Nevada Bar No. 8846
2470 St. Rose Parkway, Ste. 106H
Henderson, Nevada 89074
(702) 353-4225 (phone)
(702) 912-0088 (fax)
Lvlaw03@yahoo.com

Mailing Address:
9484 South Eastern Ave., #399
Las Vegas, Nevada 89123
Attorney for Defendant
WESLEY ALLEN LEWIS

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS aka
MARIA DANIELA PERDOMO,

Plaintiff,

v.

WESLEY ALLEN LEWIS,

Defendant.

Case No. D-10-427054

Dept No. T

Hearing Date: 5/01/14

Time of Hearing: 9:30 am

ORDER

This action having come on for hearing for Plaintiff's *Motion* to modify custody and related matters and Plaintiff, Maria Daniela Perdomo, appearing with her counsel, Fran Fine, Esq. and Corrine Price, Esq. and Defendant, Wesley Allen Lewis, appearing with his counsel, Patricia A. Marr, Esq., appearing in an unbundled capacity, and Ms. Marr, Esq. having confirmed her withdrawal as counsel and no objection having

///

///

RECEIVED

MAY 07 2014

FAMILY COURT
DEPARTMENT T

1 been made to the same, and good cause appearing, it is hereby

2 ORDERED that Ms. Marr's request to withdraw as counsel is granted.

3 DATED this 9th day of May, 2014.

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28
DISTRICT COURT JUDGE *LS*

GAYLE NATHAN

Respectfully submitted by:

PATRICIA A. MARR, LTD.

~~PATRICIA A. MARR, ESQ.~~

Nevada Bar No. 008846

2470 St. Rose Parkway, Ste. 106H

Henderson, Nevada 89074

(702) 353-4225 (phone)

(702) 912-0088 (fax)

lvlaw03@yahoo.com

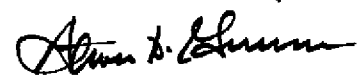
Mailing Address:

9484 South Eastern Ave., #399

Las Vegas, Nevada 89123

Attorney for Defendant

WESLEY ALLEN LEWIS



CLERK OF THE COURT

1 WIT
2 The Fine & Price Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@finepricelaw.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10-427054-D
Plaintiff,)	DEPT. NO. T
)	
vs.)	DATE OF HEARING: 7-29-14
)	TIME OF HEARING: 1:30 p.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

PLAINTIFF'S INITIAL LIST OF WITNESSES

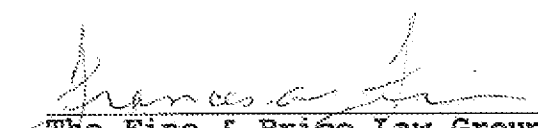
COMES NOW Plaintiff, MARIA DANIELA PERDOMO, by and through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price Law Group, and submits her initial list of witnesses Plaintiff intends to call at the July 29, 2014 hearing in this matter:

1. Plaintiff, c/o The Fine & Price Law Group, 8975 South Pecos Road, Suite 5, Henderson, Nevada 89074, telephone (702) 384-8900.
2. Defendant.
3. Ms. Sarah Burgess, Twitchell Elementary School, 2060 Desert Shadow Trail, Henderson, Nevada 89012, telephone (702) 799-6860.
4. Warren Wheatley, ACSW, LCSW, DCSW, Oasis Counseling,

1 LLC, 2360 W. Horizon Ridge Parkway, Ste. 120, Henderson, Nevada
2 89052, telephone (702) 294-0433.

3 5. Scott Neuah, Kumon, 10545 S. Eastern Avenue, Ste.
4 110, Henderson, Nevada 89052, telephone (702) 365-5866.

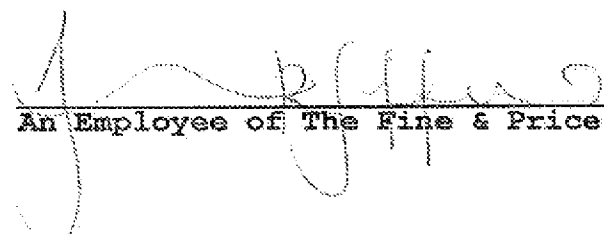
5 DATED this 12th day of May, 2014.

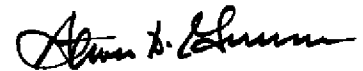
6
7 
8 The Fine & Price Law Group
9 FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
Attorney for Plaintiff
MARIA DANIELA PERDOMO

10 CERTIFICATE OF SERVICE

11 I HEREBY CERTIFY that on the 12th day of May, 2014,
12 service of the foregoing Plaintiff's Initial List Of Witnesses was
13 made by placing a copy of same into the United States Mail, first
14 class postage prepaid, at Henderson, Nevada, addressed to:

15 Wesley Allen Lewis
16 4650 Idaho Avenue
17 Las Vegas, Nevada 89104

18
19 
20 An Employee of The Fine & Price Law Group
21
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28



CLERK OF THE COURT

COS
PATRICIA A. MARR, LTD.
PATRICIA A. MARR, ESQ.
Nevada Bar No. 008846
2470 St. Rose Parkway, Ste. 106H
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lvlaw03@yahoo.com

Mailing Address:

9484 South Eastern Ave., #399
Las Vegas, Nevada 89123
Attorney for Defendant,
WESLEY ALLEN LEWIS

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS aka)
MARIA DANIELA PERDOMO,)

Plaintiff,)

v.)

WESLEY ALLEN LEWIS)

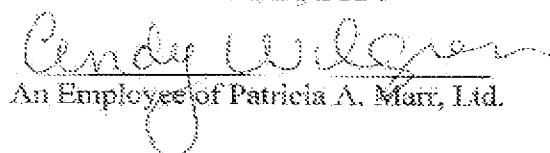
Defendant.)

CASE NO. D-10-427054
DEPT NO. T

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of May, 2014, I mailed via the U.S. Mail,
postage prepaid a copy of an *Order* from the May 1st 2014 hearing to the following: *Frances Ann*
Fine, Esq. Fine & Price Law Group, 8975 S. Pecos Road, #5, Henderson, Nevada 89074.

PATRICIA A. MARR, LTD.



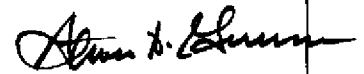
An Employee of Patricia A. Marr, Ltd.

1 OSEH

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA

4 ****

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CLERK OF THE COURT

5 MARIA DANIELA LEWIS, PLAINTIFF
6 VS.
7 WESLEY ALLEN LEWIS, DEFENDANT.

CASE NO: D-10-427054-D
DEPARTMENT T

8 **ORDER SETTING EVIDENTIARY HEARING**

9 **PRE-Trial Memorandum DUE: July 22, 2014**

10 **HEARING DATE: July 29, 2014 and August 05, 2014**

11
12 **IT IS HEREBY ORDERED** that the above-entitled case is set for an
13 Evidentiary Hearing in Department T on **July 29, 2014, at the hour of 1:30 PM** for a
14 period of **one half (1/2) day each date** at the Family Courts & Services Center, 601
15 N. Pecos Road, Las Vegas, Nevada, 89101 in courtroom #5. If this matter settles,
16 please advise the Court as soon as possible.

17 **IT IS FURTHER ORDERED** that a Pre-Trial Memorandum be filed on or
18 before **July 22, 2014**. A copy of same is to be hand-delivered to Judge's chambers
19 and served upon opposing counsel or party the same day. The Pre-Trial
20 Memorandum shall set forth the issues in a clear and concise manner, the relief
21 requested, along with any relevant case law or statutes in point and authorities
22 format. Failure to file and exchange the Pre-Trial Memorandum on the designated
23 date shall result in sanctions. Said sanctions may include striking the Complaint or
24 Answer/Counterclaim, vacating the trial date, or monetary sanctions.

25 **IT IS FURTHER ORDERED** that all discovery shall be completed no later than
26 June 30, 2014. Initial Witness Lists shall be filed and exchanged no later than the
27 close of business May 12, 2014, and can be supplemented thereafter. Any and all
28

1 Tabbed Exhibits must be delivered to chambers no later than one week prior to
2 Evidentiary Hearing.
3

4 **IT IS FURTHER ORDERED** that no continuances will be granted to either
5 party unless written application is made to the Court, served upon opposing counsel,
6 and a hearing held at least three (3) days prior to the Evidentiary Hearing.

7 **DATED:** This 27th day of May, 2014.



8
9 GAYLE NATHAN
10 District Court Judge
11 Department T
12

13 **CERTIFICATE OF MAILING**

14
15 I hereby certify that I caused on the above file stamped date, a copy of the attached
16 **Order Setting Evidentiary Hearing** to be mailed postage prepaid to the following
17 person or persons at their last known address:

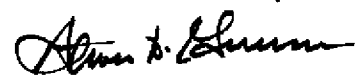
18 Frances-Ann Fine, Esq.
19 8975 South Pecos Road, Suite 5
20 Henderson, NV. 89074
fran@franpricelaw.com

21 WESLEY A LEWIS
22 4650 Idaho Avenue
Las Vegas, NV. 89104

23 By:



24 Caryne Pierce
25 Judicial Executive Assistant
26 Department T
27
28



CLERK OF THE COURT

1 ORD
The Fine Law Group
2 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
3 8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
4 Telephone: 702/384-8900
Facsimile: 702/384-6900
5 fran@thefinelawgroup.com
Attorney for Plaintiff
6 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka
10 MARIA DANIELA PERDOMO,

Plaintiff,

11 vs.

12 WESLEY ALLEN LEWIS,

13 Defendant.
14

)
)
) CASE NO. D-10-427043-D
) DEPT NO. T
)
) DATE OF HEARING: 5/1/2014
) TIME OF HEARING: 9:30 a.m.
)
)
)
)

427054

15 ORDER

16 THIS matter having come before the Court on May 1, 2014
17 for hearing on Plaintiff's Motion to Modify Custody, to Enforce
18 Order of December 27, 2013 and Award of Attorney Fees and
19 Defendant's Opposition and Countermotion thereto. Plaintiff, MARIA
20 PERDOMO, appearing personally and through her counsel, FRANCES-ANN
21 FINE, ESQUIRE, of The Fine & Price Law Group; Defendant, WESLEY
22 ALLEN LEWIS, appearing personally and through his counsel, PATRICIA
23 A. MARR, ESQUIRE, in an unbundled capacity; the Court having
24 reviewed all papers and pleadings on file herein and having
25 considered the arguments presented and good cause appearing,

26 IT IS HEREBY ORDERED that the parties minor child shall
27 remain in counseling until the mental health professional feels
28

1 that it is no longer a benefit to the child. No parent shall
2 unilaterally decide to stop the counseling. (VT 9:58:20 - 9:58:35)

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4 hereby temporarily modified until the Evidentiary Hearing, based on
5 ~~not seeking~~ ^{ALLEGATIONS HE FAILED TO SEEK} medical treatment for the minor child, his avoidance of
6 the police on a well check, not following the court ordered
7 financial support and not acting in the best interest of the child.
8 (VT 9:58:40 - 10:00:02)

9 IT IS FURTHER ORDERED that Defendant's visitation while
10 the minor child is in school commences on Monday after school
11 through Wednesday at 6:00 p.m. Once school is out of session,
12 Defendant shall have visitation Monday at 9:00 a.m. through
13 Wednesday at 6:00 p.m. (VT 10:01:55 - 10:02:25)

14 IT IS FURTHER ORDERED that should the minor child have
15 any more medical episodes, Defendant is to get a copy of written
16 instructions from the doctor to follow. Any evidence to the
17 Defendant not following the doctors' medical protocol, Plaintiff
18 may place this issue back on the Court's calendar for further
19 orders. (VT 10:02:30 - 10:02:58)

20 IT IS FURTHER ORDERED that the attorney fee award in
21 favor of the Plaintiff in the amount of \$15,000.00, previously
22 ordered on the 8th day of October, 2013, is hereby reduced to
23 judgment, subject to any offsets if payments have been made. (VT
24 10:00:25 - 10:00:38)

25 IT IS FURTHER ORDERED that for the record, Defendant paid
26 Plaintiff \$84.50 by a money gram in open court as and for child
27 support. (VT 10:17:58 - 10:18:20)

28

1 IT IS FURTHER ORDERED that the Order to Show Cause
2 hearing currently scheduled for May 21, 2014 is hereby continued
3 until the Evidentiary Hearing. (VT 10:03:01 - 10:03:16)

4 IT IS FURTHER ORDERED that the Evidentiary Hearing shall
5 be scheduled for July 29, 2014 at 1:30 p.m. and August 5, 2014 at
6 1:30 p.m. (VT 10:17:05 - 10:17:45)

7 IT IS FURTHER ORDERED that the pre-trial memoranda and
8 tabbed exhibits must be delivered to the opposing party and to
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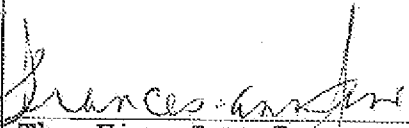
14 IT IS FURTHER ORDERED that the initial list of witnesses
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
17 DATED this 12th day of June, 2014

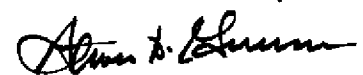
18 
19 DISTRICT COURT JUDGE 
GAYLE NATHAN

20 SUBMITTED BY:

APPROVED AS TO FORM AND CONTENT:

21 
22 The Fine Law Group
23 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
24 8975 South Pecos Road
Henderson, NV 89074
25 Telephone: 702-384-8900
Facsimile: 702-384-6900
26 fran@thefinelawgroup.com
Attorneys for Plaintiff

27 
PATRICIA A. MARR, LTD
PATRICIA A. MARR, ESQUIRE
Nevada Bar NO. 8846
28 4305 Dean Martin Dr., Suite 184
Las Vegas, NV 89103
Telephone: 702-353-4225
Facsimile: 702-737-1776
Lvlaw03@yahoo.com
Attorney for Defendant (unbundled)



CLERK OF THE COURT

NEOJ
The Fine & Price Law Group
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
Suite 5
8975 South Pecos Road
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT NO. T
vs.)	
)	DATE OF HEARING: 5/1/2014
)	TIME OF HEARING: 9:30 a.m.
WESLEY ALLEN LEWIS,)	
Defendant.)	

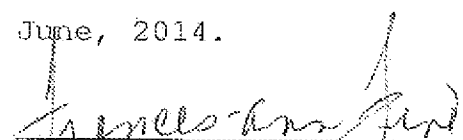
NOTICE OF ENTRY OF ORDER

TO: WESLEY ALLEN LEWIS, Defendant;

TO: PATRICIA MARR, Attorney for Defendant:

YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an ORDER, a copy of which is attached hereto, was entered and filed in the above-entitled matter on the 16th day of June, 2014.

DATED the 18 day of June, 2014.



The Fine & Price Law Group
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 S. Pecos Road, Ste. 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA PERDOMO

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CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing NOTICE OF ENTRY OF ORDER, was made on the 11th day of June, 2014, at Henderson, Nevada, by copy of same being delivered as indicated to the individuals listed below:

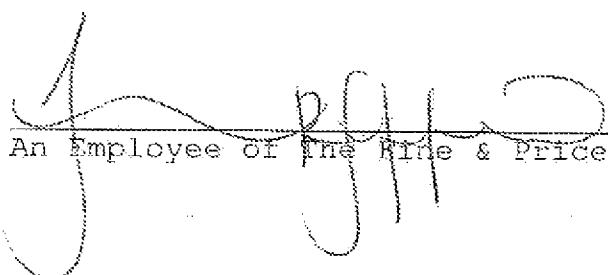
Patricia Marr, Esquire
4305 Dean Martin Dr., Ste 184
Las Vegas, Nevada 89145

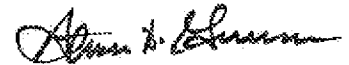
☒ Via E-Filing
☒ Via U.S. Mail
☐ Via Facsimile
☐ Via Email

and

Wesley Lewis
4650 Idaho Avenue
Las Vegas, Nevada 89104

☐ Via E-Filing
☒ Via U.S. Mail
☐ Via Facsimile
☐ Via Email


An Employee of the Fine & Price Law Group


CLERK OF THE COURT

1 ORD
2 The Fine Law Group
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

427054
CASE NO. D-10-427043-D
DEPT NO. T
DATE OF HEARING: 5/1/2014
TIME OF HEARING: 9:30 a.m.

ORDER

THIS matter having come before the Court on May 1, 2014 for hearing on Plaintiff's Motion to Modify Custody, to Enforce Order of December 27, 2013 and Award of Attorney Fees and Defendant's Opposition and Countermotion thereto. Plaintiff, MARIA PERDOMO, appearing personally and through her counsel, FRANCES-ANN FINE, ESQUIRE, of The Fine & Price Law Group; Defendant, WESLEY ALLEN LEWIS, appearing personally and through his counsel, PATRICIA A. MARR, ESQUIRE, in an unbundled capacity; the Court having reviewed all papers and pleadings on file herein and having considered the arguments presented and good cause appearing,

IT IS HEREBY ORDERED that the parties minor child shall remain in counseling until the mental health professional feels

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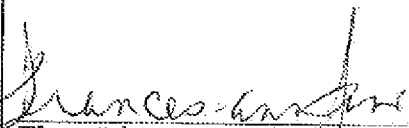
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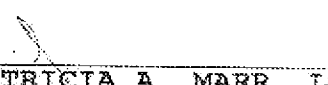
17 DATED this 12th day of June, 2014

18 
19 DISTRICT COURT JUDGE
GAYLE NATHAN

20 SUBMITTED BY:

APPROVED AS TO FORM AND CONTENT:

21 
22 The Fine Law Group
23 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
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26 fran@thefinelawgroup.com
Attorneys for Plaintiff

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Las Vegas, NV 89103
Telephone: 702-353-4225
Facsimile: 702-737-1776
Lvlaw03@yahoo.com
Attorney for Defendant (unbundled)

Opp
Wesley Allen Lewis
4650 Idaho Ave.
Las Vegas, Nevada 89104
702-432-3996
Defendant In
Proper Person

Electronically Filed
06/26/2014 02:54:49 PM


CLERK OF THE COURT

**District Court
Family Division
Clark County, Nevada**

AKA- Maria Daniela Scrima
AKA- Maria Daniela Lewis
AKA- Maria Daniela Perdomo
AKA- Maria Daniela Fuentes

Plaintiff

Case No. D-10-427054

- VS -

Dept. No. T

Wesley Allen Lewis

Date of hearing: 7/29/2014

Defendant

Time of hearing: 1:30 PM

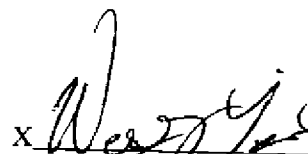
Discovery

Discovery: and motion for temporary custody pending trial and motion to have plaintiff held in contempt and for attorney fees be awarded to defendant

Comes now, defendant Wesley Allen Lewis, in proper person and hereby files his discovery and motion for temporary custody pending trial.

Defendant motion for order for temporary custody is made and based upon the following memorandum of points and Authorities, the findings of facts affidavits, of defendant and witnesses and newly discovered evidence bordering fraud and colorable representation due to presumptive evidence presented by plaintiff

Dated This 26th day of June 2014.

X 
Wesley Allen Lewis
Defendant in proper person

POINTS AND AUTHORITIES

REITERATION OF FACTS WITH ADDITIONAL FACTS

Defendant, WESLEY ALLEN LEWIS, and Plaintiff, MARIA PERDOMO were divorced by way of Decree on July 26, 2011. Pursuant to the Decree, the parties stipulated to the joint legal and physical custody of the minor child, Isabella Sarah Lewis, DOB: August 10, 2006. During the divorce Maria asked to have her maiden name restored to Pedromo.

Point

After the divorce, **Maria filed Chapter 7 Bankruptcy and wiped out all of her debt. Under her maiden name Perdomo, leaving her debt free.** Consequently, all of the debt was dumped into Wesley's lap, including all of the bills associated with the parties' deceased infant son. Wesley continues in his efforts to meet all of his financial obligations, including the debt from the parties' marriage; however it has placed a significant financial burden on him (this all happened during the rescission of late)

Point

On or about February 27, 2013, the Child Support Court heard Wesley's request for a downward modification of his child support based upon a significant decrease in his monthly wages. When the Hearing Master granted Wesley's request upon hearing the truth Maria stormed out of the court room and has been on a vendetta to make Wesley "pay" in any way, shape or form that she can, including now, a request to modify the joint physical custody the parties stipulated to. Maria's ultimate goal is to remove Isabella from the State of Nevada, which she has already informed Isabella that she is going to do. Isabella stated to her dad, Momma said we are moving to California Soon.

Point

Maria is not the "demure", innocent girl she portrays herself to be in court. In fact, she has utilized Isabella as a pawn in her never-ending quest to punish and torment Wesley – **3 years** after the divorce! Moreover, Maria's goal is to relocate out of the State of Nevada and therefore, a modification of custody will make that goal more achievable.

Nonetheless, it is not in Isabella's best interest that joint physical custody be modified for many reasons.

First, Maria suffers from hypothyroidism, a syndrome in which "psychiatric Symptoms are fairly common and may precede all other physical signs and symptoms. Typical manifestations are those of mental lethargy and slowing of all cognitive functions, leading to poor concentration and impairment of short-term memory. Depressive symptoms and, to some extent, anxiety may commence as early as 3 weeks after the onset of hypothyroidism. Insomnia, irritability and mood liability often occur. (**Exhibit A**)

Maria has a volatile, "hair-trigger" temper, which is exacerbated by her condition. 1 Despite Wesley's best efforts to communicate in a way as to not upset Maria, Maria is loud, abusive, uncooperative, and typically hangs up the telephone on Wesley 99% of the time that he attempts to co-parent with her. Such behaviour is not in Isabella's best interest, especially when it takes place in front of Isabella. Moreover, it evidences Maria's refusal and/or inability to co-parent with Wesley, despite his best efforts to do so. **See Exhibit A-1** affidavit of Sid Lewis Grandfather.

Maria has lived with a multitude of men since the parties' divorce and Wesley is informed that Isabella is forced to sleep with Maria and her boyfriend's when Isabella is not provided with a bedroom of her own. Subsequent to the divorce Maria and Isabella have lived in a one-bedroom condo at the Aria Hotel with Maria's former boyfriend, Ele Sahot and another boyfriend, Kevin Little John in a one bedroom condo on East Flamingo. Maria's and her current boyfriend, Juan Fuente, only recently moved into a 2 bedroom condo after previously living in a one bedroom condo. Isabella informed Wesley that the 3 of them shared the same bed, but that Juan had his own blanket. **See Exhibit A-2**

Wesley denies the false assertions raised in Maria's motion:

And urges the court to order an evaluation of Maria's condition before court date (and reason being) to award Temporary Custody to Wesley, pending trial for the best interest of Isabella's safety

Maria's condition causes her to act very irritable and she often acts violently at any given moment which is in the best interest of Isabella to be with her father pending hearing date.

See exhibit A-3 – of most recent outburst – via email for father's day.

1. Maria's asserts that Wesley refuses to communicate and co-parent with her, however, the converse is accurate. Maria refuses to communicate and co-parent with Wesley, including but not limited to: refusing to answer his telephone calls and refusing to consult with Wesley regarding health care and education decisions for Isabella. **Wesley is typically only informed of Maria's unilateral decisions after the fact** (as DR. Wheatley)
2. Wesley continues to assist Isabella with her homework - as he has historically done. Isabella currently has straight A's in school and continues to excel in all subjects (Exhibit B);
3. Isabella does not miss school to "care for her sick father",
4. The assertion that Wesley "continues to sleep with the child each night" is completely false. Isabella has her own room at Wesley's home and continues to sleep, alone, in her room; as has been the case. Maria's assertion is a lie to cover up her own misconducts- (**See Exhibit A-5**)
5. Wesley is not neglecting Isabella's health needs or refuse to follow the directives of her providers. The only time that Isabella appears to be sick is while she is in Maria's care. Recently, Wesley did inquire as to whether Isabella needed to seek the doctor when she said her head hurt. Isabella's response was "No, my mom takes me to the doctor every **Thursday, Friday, Saturday and Sunday** so I don't need to." In any event, Isabella has generally remained in Maria's care while sick. Pursuant to the doctor's directives, Isabella is now taking showers instead of baths while in Wesley's care;
6. Maria's assertion that Wesley will not participate in treatment despite specific requests of her counsellor is also untrue. (**Exhibit A-6**); (**See Exhibit A-7**)
7. Notably, Warren Wheatley, who is not a licensed medical doctor, opines that Isabella went from having a rash on her to having strep throat, which may have been the cause of neglect. Again, Mr. Wheatley is not a licensed medical doctor and his *unsupported* speculation is questionable at best;
8. With respect to the financial issues, Wesley is paying what he is able to afford: Wesley made a \$200 payment on February 26, 2014, a \$500 payment on April 18, 2014, and another \$500 payment on April 25, 2014. Wesley attempted to make payments for Kumon at the Child Support Office, but was rejected. Kumon is not a requirement of the family support division but a decision made by one of the parents," Maria".

Wesley has not "thumbed his nose at the Court's orders and takes his obligations to Isabella Seriously and was acting under the direction of the family court division of the district attorney – as he was directed to do so

Wesley is simply doing the best he can within his financial means.

Statements by plaintive that Wesley has made no payment for child support and medical is not true. (See exhibit A-8 family support division district attorney)

**ARGUMENT
(PAYMENT FORMS)**

IT IS NOT ISABELLA'S BEST INTEREST TO MODIFY CUSTODY

(Because of dessent)

Custody was modified by the court on May 1st requested by the plaintive and The Plaintifs's Attorney skilfully manipulated this court to gain advantage over the Defendant. Plaintive's counsel knew that the Plaintive was wrong in enrolling Isabella to 1st grade at Twitchell Elementary School twenty (20) miles one way from father's home at 4650 Idaho Ave where Isabells has to be driven & picked up Monday, Tuesday, Wednesday, and Thursday morning by Wesley. The legal Dept. at C.C.S.D States that the parent who has the child the most days during School should have say as to where the child is to attend School, so as to make it easy on the parent doing so. Wesley and Maria had agreed that Isabella would attend Hal Smith

Elementary School 5150 East Desert Inn Road which is one block away from where Wesley was living at the time, Maria used a false address to enroll Isabella at Twichell, and without the consent of the father who was shocked at her uncaring deceiving act.

This has put a great burden on Wesley each school day for the **last 2 years** – trying to maintain School & work along with other obligations has taken its toll.

Maria has harassed Wesley during his work hours making demands that are unreasonable (this has been ongoing years) Wesley just found out about the for CCSD, co-parenting legal facts just the other day – Maria is cold hard and has a demanding personality.

She couldn't care less about the distance to and from school for Isabella the Gas & wear and tear on his car and the time it takes up each day (it's a wonder he has a job that will work with him so he can be there for Isabella). The words of her attorney that he has a "built in babysitter" is not true. Unlike Maria, Wesley is there each day for Isabella after School. (See Exhibit B)

Argument cont NRS 125.480

Best interests of child; preferences; presumptions when court determines parent or person seeking custody is perpetrator of domestic violence or has committed act of abduction against child or any other child.

1. In determining custody of a minor child in an action brought under this chapter, the sole consideration of the court is the best interest of the child. If it appears to the court that joint custody would be in the best interest of the child, the court may grant custody to the parties jointly.
2. Preference must not be given to either parent for the sole reason that the parent is the mother or the father of the child.
3. The court shall award custody in the following order of preference unless in a particular case the best interest of the child requires otherwise:
 - (a) To both parents jointly pursuant to NRS 125.490 or to either parent. If the court does not enter an order awarding joint custody of a child after either parent has applied for joint custody, the court shall state in its decision the reason for its denial of the parent's application.
 - (b) To a person or persons in whose home the child has been living and where the child has had a wholesome and stable environment.**
 - (c) To any person related within the fifth degree of consanguinity to the child whom the court finds suitable and able to provide proper care and guidance for the child, regardless of whether the relative resides within this State.
 - (d) To any other person or persons whom the court finds suitable and able to provide proper care and guidance for the child.
4. In determining the best interest of the child, the court shall consider and set forth its specific findings concerning, among other things: **Wesley**
 - (a) The wishes of the child if the child is of sufficient age and capacity to form an intelligent preference as to his or her custody.
 - (b) Any nomination by a parent or a guardian for the child. **Wesley**
 - (c) Which parent is more likely to allow the child to have frequent associations and a continuing relationship with the noncustodial parent. Wesley**
 - (d) The level of conflict between the parents.

- (e) The ability of the parents to cooperate to meet the needs of the child. Wesley*
- (f) The mental and physical health of the parents. Wesley*
- (g) The physical, developmental and emotional needs of the child, Wesley*
- (h) The nature of the relationship of the child with each parent.*
- (i) The ability of the child to maintain a relationship with any sibling.
- (j) Any history of parental abuse or neglect of the child or a sibling of the child. **Maria**
- (k) Whether either parent or any other person seeking custody has engaged in an act of domestic violence against the child, a parent of the child or any other person residing with the child **Maria**
- (l) Whether either parent or any other person seeking custody has committed any act of abduction against the child or any other child. **Maria (See Exhibit B-1)**

(b) To a person or persons in whose home the child has been living and where the child has had a wholesome and stable environment. Wesley

Isabella enjoys a wholesome and stable environment while in Wesley's care, while conversely, she is subjected to a multitude of strange men and subjected to her mother's relations when she must live in a one bedroom condo. Despite sharing a bed with her mother and various men, Isabella has exclaimed that "he has his own blanket!" Such conduct is not in the best interest of impressionable Isabella. NRS 125.510 (ARGUMENT EXHIBIT B-2 NRS 125.510)

(c) Which parent is more likely to allow the child to have frequent associations and a continuing relationship with the noncustodial parent. (Wesley)

Maria has historically demonstrated that she is the parent least likely to allow Isabella to have a continuing relationship with Wesley. Her recent conduct of contacting the police in an attempt to tear Isabella from Wesley during his timeshare and horrifying Isabella is part and parcel of her pattern of behaviour, including but not limited to the filing of her instant motion. See argument exhibit #2 (afidavid of Sid Lewis)

(e) The ability of the parents to cooperate to meet the needs of the child.

Maria has further demonstrated that she is unwilling to co-parent with Wesley, including but not limited to, unilaterally making decisions regarding Isabella's health and education without consulting with Wesley and only telling him about her decisions after she has implemented them; **verbally abusing Wesley in front of Isabella; calling the police without a basis and subjecting Isabella to emotional trauma;** refusing to answer her own daughter's telephone calls; and otherwise continually behaving in a narcissistic manner. Such behaviour is not in the best interest of Isabella. (See Exhibit B-3)

(f) The mental and physical health of the parents.

Wesley submits that Maria's mental health is questionable, in addition to her volatile temper, which is not in Isabella's best interest. (See Exhibit B-4)

(g) The physical, developmental and emotional needs of the child.

Isabella is young and impressionable and Maria's constant attempts to create drama in the parties' lives is adversely affecting her. Consistent with see argument exhibit # (copy of hypothyroidism systems) (See Exhibit B-5)

(h) The nature of the relationship of the child with each parent.

Isabella has a wonderful relationship with Wesley who continues to nurture her and provide her with a stable and wholesome environment. Isabella feels safe when she is with Wesley, whose (Wesley's current employee is aware of his situation and works with Wesley on scheduling) sole focus has been on her upbringing. Apparently, Isabella's relationship with Maria is not as good, as Maria recently confessed that Isabella acts out while in her care, by biting her and slapping her.

Clearly, Isabella is exhibiting anger toward Maria, which is not in Isabella's best interest and warrants further investigation as to why Isabella has such anger and contempt for Maria. (See Exhibit B-6)

WESLEY SHOULD BE AWARDED HIS ATTORNEY'S FEES FOR HAVING TO RESPOND TO MARIA'S SPECIOUS MOTION.

NRS 18.080 provides:

1. The compensation of an attorney and counsellor for his or her services is governed by agreement, express or implied, which is not restrained by law.
2. In addition to the cases where an allowance is authorized by specific statute, the court may make an allowance of attorney's fees to a prevailing party:
 - (a) When the prevailing party has not recovered more than \$20,000; or
 - (b) Without regard to the recovery sought, when the court finds that the claim, counterclaim, cross-claim or third-party complaint or defence of the opposing party was brought or maintained **without** reasonable ground or to harass the prevailing party. The court shall liberally construe the provisions of this paragraph in favour of awarding attorney's fees in all appropriate situations. It is the intent of the Legislature that the court award attorney's fees pursuant to this paragraph and impose sanctions pursuant to **Rule 11 of the Nevada Rules of Civil Procedure** in all appropriate situations to punish for and deter frivolous or vexatious claims and defenses because such claims and defenses overburden limited judicial resources, hinder the timely resolution of meritorious claims and increase the costs of engaging in business and providing professional services to the public.
3. In awarding attorney's fees, the court may pronounce its decision on the fees at the conclusion of the trial or special proceeding without written motion and with or without presentation of additional evidence.
4. Subsections 2 and 3 do not apply to any action arising out of a written instrument or agreement which entitles the prevailing party to an award of reasonable attorney's fees.

Maria's quest to undermine Wesley's parenting skills is motivated by nothing more than her plan to leave the State of Nevada and otherwise based on sheer retribution using the court to accomplish her motive **Maria has no ties to Las Vegas what so ever!** She cleared her debt to xxxx when she asked for her maiden name be restored and being done so filed chapter 7 Bankruptcy. Any obligation to debt or ties to Las Vegas & the repayment of such now is all in Wesley's hands. A premeditated move by Maria's intent to relocate and be free of any obligation.

Wesley should be awarded all fees incurred as a result of her conduct!! And disgusting repugnant acts of Disregard for Isabella's state of mind safely while in Maria's so called care. (See Exhibit B-7)

MARIA FAILED TO COMPLY WITH EDCR 5.11 BEFORE FILING HER MOTION.

WESLEY MAY NOT BE HELD IN CONTEMPT FOR HIS INABILITY TO PAY.

In Rodriguez v. The Eighth Judicial District Court, 120 Nev. 798 (2004) the Nevada

Supreme Court held:

While the determination of a party's indigency status is generally within the trial court's sound discretion and, therefore, entitled to great deference on review, it is also subject to careful scrutiny when it involves the protection of basic constitutional rights.

Id.

It further held:

A party cannot be found guilty of contempt for failing to pay child support and sentenced to jail conditional upon his payment of arrearages unless the trial court first determine that the individual (1) has the ability to make the payment and (2) wilfully refuses to pay.

- Id. In Wesley's case he has always shown his love & care for Isabella. He fell behind when the unemployment rate was 30% and he was unemployed for a period of one year. He finally found employment and has been doing his best to catch up and stay current.

Yet further, the Court held:

In determining whether an indigent party in a **contempt** proceeding based on non-payment of child support has a due process right to appointment of counsel, after balancing each of the due process elements against the other, they as a whole are measured against the presumption that a right to appointed counsel arises only when the indigent party may lose his personal freedom. U.S.C.A. Const. Amend. 14.

The need for appointed counsel in a civil **contempt** proceeding for non payment of child support turns on an initial determination of indigency, for unless a party is truly indigent, the State need not provide representation; if an indigent party faces the threat of possible incarceration for the non-payment of child support, the court should then seek to balance the private liberty interest at stake, the government's interest, and the risk of an erroneous finding, *taking into account the complexity of the legal and factual issues and the party's ability to effectively communicate on his own behalf*

As a matter of law, Wesley cannot be held in contempt of court for his inability to pay.

Final Point

Maria's past has caught up with her, she lied to Wesley when they first met, leading him to believe she was single. Committing Adultery, she became pregnant by Wesley- Wesley paid for her divorce so they could get married. She lied to the courts during divorce proceedings and after divorce never let anyone know her change in address including the court. She lied to the school District with a signed affidavit as to her residence for enrolling Isabella in 1st grade as was seen by this court. (Exhibit B-8). If she lied to the C.C.S.D. and got away with it! Being under oath is meaningless to Maria.

Exhibit “A”

Maria Lewis
1405 S. Nellis Blvd, 2116
Las Vegas NV 89104
Ph. 457-1812

To: Dennis /
Dr. Meli's Office
6301 Mountain Vista Street
Suite 100
Henderson, NV 89014

Subject: Medical authorization to be excused from Jury Duty

Dennis due to the complication with my thyroid under supervision of Dr. Meli via Cheryl, can help me by faxing over to the Jury summons Judicial District Court a medical authorization written by Dr. Meli excusing me from Jury Duty. Fax number is 702.671.4515

Thanks you to so much and have a wonderful day.

Sincerely,
Maria Lewis

HYPERTHYROIDISM

Hyperthyroidism refers to a syndrome resulting from excessive production of thyroid hormones. The condition can be caused by several diseases, such as thyroid tumors, inflammation, and spontaneous diffuse overactivity of the gland. Severe stress, and acute emotional disturbances have been implicated in precipitating hyperthyroidism as well (Michael & Gibbons, 1963). Common physical signs and symptoms include fatigue, palpitations, tremor, diarrhea, weight loss despite increased appetite, excessive sweating, intolerance of warm temperatures, and oligomenorrhea (reduced menstrual blood flow). In cases of Graves' disease, prominent proptosis (exophthalmos or protrusion of the eyes) may occur. The gland may or may not be enlarged. The disease affects females more than males in a ratio of 6 to 1, and occurs most commonly during the second and third decades of life (Lishman, 1987).

Psychiatric manifestations of hyperthyroidism include restlessness, irritability, overactivity, and emotional lability. Distractibility, impaired concentration, and difficulty with recent memory may occur as well (Whybrow, Prange & Treadway, 1969). In some cases, severe anxiety and panic symptoms can develop. The symptoms can be identical to those encountered in "primary" disorders to the point that misdiagnosis is fairly common. Symptoms of mood disorders can also occur, especially mania and, less frequently, depression. Symptoms of psychosis with hallucinations and delusions that can resemble schizophrenia have also been reported (Greer & Parsons, 1968).

Careful differential diagnosis should be undertaken, and the diagnosis is usually confirmed by specific laboratory tests that show elevation of thyroid hormones. Treatment should focus on the underlying cause by administering antithyroid drugs. Usually, most neuropsychiatric symptoms reverse with antithyroid treatment, although a full year may be needed before complete recovery is attained (Goldman, 1992). Symptomatic treatment with anxiolytic

and antipsychotic is very effective.

Hypothyroidism resulting from decreased production of thyroid hormones. The condition can be caused by ablation of the gland, treatment, and, in some cases, autoimmune disease. Common signs and symptoms include fatigue, low energy level, vague, slow pulse, weight gain, intolerance to cold, constipation, oligomenorrhea (increased menstrual blood flow), and impotence in males. The skin is puffy complexion. The face is pale and its texture is usually coarse and dry. The voice is coarse and hoarse. The thyroid gland may be enlarged. Reflexes are slow to occur more frequently. The ratio of 8 to 1, and is more common in females (Lishman, 1987).

Psychiatric symptoms include all other physical manifestations are the same. All cognitive functions are impaired of short-term memory of interest and initiative. In severe or long-standing cases, patients report mistakes (Goldman, 1990). In some extent, anxiety and depression may occur weeks after the onset of the disease (1990). Insomnia, if it occurs. Psychosis is usually

Exhibit “*A-1*”

GENERAL AFFIDAVIT

Dated this 26th day of JUNE, 20 14

BEING FIRST DULY SWORN, deposes and says: I/We, My wife AND I both would have liked to stay of this mess of a custody battle. for one thing Maria lives in a dream world trying to show her mother that she is living up to her expectations. I have seen her explode over the smallest thing with Isabella AND Wesley. When she lived here she was very unhappy with everybody. She called Isabella one day to go with her where ever she was going, Isabella didn't want to go, she got angry AND said - - - you AND gave Isabella the finger sign. She AND Wesley were in the back patio talking AND she exploded AND she started hitting Wesley. Wesley put his arms around her face to face to keep her from swinging. She scratched his face so bad it bled AND he used some make up to cover it up for work. I have tried to counsel them together AND she said I don't have to listen to you, so she left. She left once for 4 months. She had her stepdad call Wesley to please let her see Isabella AND Wesley did. They got back together just long enough for her to get ISABELLA AND moved out. It's been terrible ever since.
IN WITNESS WHEREOF, I/We have hereunto set my hand/our hands this 26th day of JUNE, 20 14.

Signature of Affiant

Signature of Affiant

Print or Type name here

Print or Type name here

STATE OF _____)

COUNTY OF _____)

SWORN TO AND SUBSCRIBED to before me by _____

on this _____ day of _____, 20 _____

Notary Public

My commission expires: _____

Consult an attorney if you doubt this forms fitness for your purpose.

AFF100mk

Nevada Legal Forms & Books, Inc. (702) 870-8977
3901 West Charleston Boulevard
Las Vegas, Nevada 89102
www.legalformsmk.com

© Consult an attorney if you doubt this forms fitness for your purpose

Exhibit “#2”

CLARK COUNTY SCHOOL DISTRICT REGISTRATION FORM - Please Print Clearly

Homeroom Teacher: FloraRoom No. 58

Rev 02/11

STUDENT MUST BE ENROLLED BY LEGAL NAME (As per birth certificate or other legal document)

HOME LANGUAGE SURVEY:

Parent or Guardian Must Complete.

1. First language learned by student?

☒ English ☐ ASL/Deaf☐ Other

2. Language spoken by student with friends?

☒ English ☐ ASL/Deaf☐ Other

Language used in home?

☐ English ☐ ASL/Deaf☒ Other Spanish

Is student 1/4 (25%) AMERICAN INDIAN or enrolled in a tribe?

☐ Yes ☐ No

SCHOOL INFORMATION

Has student ever received Special Education Services? ☐ Yes ☒ NoDoes student have a current Accommodation Plan (Section 504) in school? ☐ Yes ☒ NoHas student ever been expelled? ☐ Yes ☒ NoDATE 8-27-12 ☐ Yes ☒ No

Student's Last Name

Lewis

First Name

Isabella

Middle Name

Sara

Apndg

1st

Grade

F

Gender

F

Home Address

497 First Light Henderson

Residence Phone Number

Student Cell Number

Mailing Address/P.O. Box (if different than Residence)

Zip Code

Birth Date

08/10/12

Birth Place (City/State/Country)

Las Vegas NV

SSN # (Last four digits only)

000-00-7270

PARENT/GUARDIAN INFORMATION - MUST BE COMPLETED BY LEGAL PARENT/GUARDIAN

Relationship

Mother

Parent Last Name

Lewis

Parent Employer

UNCE

Occupation

CB II

Parent First Name, Middle Initial

Maria D

Resides With

☒ Yes ☐ No

Cell Phone Number

[REDACTED]

Parent Employer

UNCE

Occupation

CB II

Parent First Name, Middle Initial

Maria D

Relationship

Father

Parent Last Name

Lewis

Parent Employer

UNCE

Occupation

CB II

Parent First Name, Middle Initial

Maria D

Resides With

☒ Yes ☐ No

Cell Phone Number

(702) 340-1221

Parent Employer

UNCE

Occupation

CB II

Parent First Name, Middle Initial

Maria D

Mother/Guardian E-mail address:

Father/Guardian E-mail address:

PARENT/GUARDIAN INFORMATION

☐ Non-Custodial☒ Joint Custody

Relationship

Father

Parent Last Name

Lewis

Parent First Name

Wesley

Occupation

CB II

Parent First Name, Middle Initial

Wesley A

Home Address

4650 Lake Ave

Cell Phone Number

[REDACTED]

Parent Employer

UNCE

Occupation

CB II

Parent First Name, Middle Initial

Wesley A

SCHOOL INFORMATION

Last School Attended - Name/Address/City/State Please Check One: ☐ CCSD ☒ Public ☐ Private ☐ CharterHas the student ever been enrolled in a CCSD SCHOOL? ☐ Yes ☒ No

SIBLING INFORMATION

Sibling At This School

Grade

Sibling At This School

Grade

Sibling At This School

Grade

LOCAL EMERGENCY CONTACT: A person who may be contacted if the parent/guardian is unavailable and who is authorized to pick up the student in an emergency.

1. Emergency Contact Person

Ann Lewis

Telephone Number

[REDACTED]

Relationship to Student

Grandmother

3. Emergency Contact Person

John Martinez

Telephone Number

[REDACTED]

Relationship to Student

Sister

2. Emergency Contact Person

Andrew Lewis

Telephone Number

[REDACTED]

Relationship to Student

Grandmother

4. Emergency Contact Person

Corrado Collins

Telephone Number

[REDACTED]

Relationship to Student

Grandmother

TRANSPORTATION REQUESTED FOR:

MAG (Magnet)

2M (Lives 2 miles away or greater)

MD (Medical, Non SpEd)

SE (SpEd Related)

CHOICE (NCIB)

M2M (Approved Zone Option)

Hazard

Note: Please contact Special Education to arrange transportation for self-contained students.

PARENT/GUARDIAN SIGNATURE

DATE 08/17/06 COMMENTS

CCSD

CLARK COUNTY SCHOOL DISTRICT

REV. 02/11

6

721

CLARK COUNTY SCHOOL DISTRICT REGISTRATION FORM - Please Print Clearly

NRS 392.165: STATE LAW REQUIRES ENROLLMENT OF STUDENT BY LEGAL NAME

Homeroom Teacher:

F. Davis

Room No.: 58

STUDENT MUST BE ENROLLED BY LEGAL NAME. (As per birth certificate or other legal document)

HOME LANGUAGE SURVEY:

Parent or Guardian Must Complete

1. First language learned by student?

☐ English ☐ ASL/Deaf

☐ Other _____

2. Language spoken by student with friends?

☐ English ☐ ASL/Deaf

☐ Other _____

☐ English used in home? ☐ English ☐ ASL/Deaf ☐ Other _____

Is student 1/4 (25%) AMERICAN INDIAN or enrolled in a tribe?

☐ Yes ☐ No

SCHOOL INFORMATION

Has student ever received Special Education Services? ☐ Yes ☐ NoDoes student have a current Accommodation Plan (Section 504) in school? ☐ Yes ☐ NoHas student ever been expelled? ☐ Yes ☐ No

SCHOOL USE ONLY

With Certificate ☐ Yes ☐ No

Immunizations ☐ Yes ☐ No

Records Requested ☐ Yes ☐ No

Military Compact ☐ Yes ☐ No

30-day Provisional Enrollment ☐ Yes ☐ No

Homeless (SAS) ☐ Yes ☐ No

All Students: ☐ Yes ☐ No

1 Proof of Address ☐ Yes ☐ No

Zone Variance ☐ Yes ☐ No

Residential Affidavit ☐ Yes ☐ No

Custodial Papers/Legal Docs ☐ Yes ☐ No ☐ Pending

Student's Last Name First Name Middle Name Apndg Grade Gender

LEWIS Isaacella Sara 1 F

Home Address 595 S. Green Valley Pkwy #1524 Zip Code 891012

Residence Phone Number Student Cell Number Mailing Address/P.O. Box (if Different Than Residence) Henderson NV Zip Code

Birth Date 08/16/12 Birth Place (City/State/Country) Las Vegas NV SSN # (Last four digits only) 000-00-7290

PARENT/GUARDIAN INFORMATION - MUST BE COMPLETED BY LEGAL PARENT/GUARDIAN

Relationship Parent Last Name Parent First Name, Middle Initial

Resides With Cell Phone Number Parent Employer Occupation Employer Phone Work Ext. Work Hours

Relationship Parent Last Name Parent First Name, Middle Initial

Resides With Cell Phone Number Parent Employer Occupation Employer Phone Work Ext. Work Hours

Mother/Guardian E-mail address: Father/Guardian E-mail address:

PARENT/GUARDIAN INFORMATION ☐ Non-Custodial ☐ Joint Custody

Relationship Parent Last Name Parent First Name Parent M.I. Telephone Number

Home Address Zip Code Extra Mailing ☐ Yes ☐ No

SCHOOL INFORMATION

Last School Attended - Name/Address/City/State Please Check One: ☐ CCSD ☐ Public ☐ Private ☐ Charter Has the student ever been enrolled in a CCSD SCHOOL? ☐ Yes ☐ No

SIBLING INFORMATION

Sibling At This School Grade Sibling At This School Grade Sibling At This School Grade

LOCAL EMERGENCY CONTACT: A person who may be contacted if the parent/guardian is unavailable and who is authorized to pick up the student in an emergency.

1. Emergency Contact Person Telephone Number Relationship to Student 3. Emergency Contact Person Telephone Number Relationship to Student

2. Emergency Contact Person Telephone Number Relationship to Student 4. Emergency Contact Person Telephone Number Relationship to Student

TRANSPORTATION REQUESTED FOR:

MAG (Magnet) 2M (Lives 2 miles away or greater) MD (Medical, Non Speed) SE (Speed Related)

CHOICE (Magnet) WZM (Approved Zone Option) Hazard

Note: Please contact Special Education to arrange transportation for self-contained students.

PARENT/GUARDIAN SIGNATURE



DATE: 12/21/12

COMMENTS:

City Address 12/21/12

CCSD

CLARK COUNTY SCHOOL DISTRICT REGISTRATION FORM - Please Print Clearly

NRS 392.165: STATE LAW REQUIRES ENROLLMENT OF STUDENT BY LEGAL NAME

Homeroom Teacher:

FLORES

Room No. 58

STUDENT MUST BE ENROLLED BY LEGAL NAME: (As per birth certificate or other legal document)

HOME LANGUAGE SURVEY:

Parent or Guardian Must Complete.

1. First language learned by student?

☐ English ☐ ASL/Deaf☐ Other

2. Language spoken by student with friends?

☐ English ☐ ASL/Deaf☐ Other

Language used in home?

☐ English ☐ ASL/Deaf☐ Other

Is student 1/4 (25%) AMERICAN INDIAN or enrolled in a tribe?

☐ Yes ☐ No

SCHOOL INFORMATION

Has student ever received Special Education Services? ☐ Yes ☐ NoDoes student have a current Accommodation Plan (Section 504) in school? ☐ Yes ☐ NoHas student ever been expelled? ☐ Yes ☐ No

SCHOOL USE ONLY

Birth Certificate

Immunizations

Records Requested

Military Compact

30-day Provisional Enrollment

Homeless (SAS) code

All Students:

1. Proof of Address

Zone Variance

Residential Affidavit

Custodial Papers/Legal Docs

☐ Yes ☐ No ☐ Pending

Student's Last Name

First Name Isabelle

Middle Name S

Apndg

Grade 4th

Gender F

SCHOOL USE ONLY
Student ID
Status Date
Status Code
English Prof.
Attend Permit
Code
Date

Home Address

Residence Phone Number

Student Cell Number

Mailing Address/P.O. Box (if Different Than Residence)

Zip Code

Birth Date

Birth Place (City/State/Country)

SSN # (Last four digits only)

000-00-

PARENT/GUARDIAN INFORMATION - MUST BE COMPLETED BY LEGAL PARENT/GUARDIAN

Relationship

Parent Last Name

PERDANA

Parent First Name, Middle Initial

MARENA DANIELA

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Mother/Guardian E-mail address:

Father/Guardian E-mail address:

PARENT/GUARDIAN INFORMATION

☐ Non-Custodial☐ Joint Custody

Relationship

Parent Last Name

Parent First Name

Parent M.I.

Telephone Number

Home Address

Zip Code

Extra Mailing

☐ Yes ☐ No

SCHOOL INFORMATION

Last School Attended - Name/Address/City/State Please Check One: ☐ CCSD ☐ Public ☐ Private ☐ CharterHas the student ever been enrolled in a CCSD SCHOOL? ☐ Yes ☐ No

SIBLING INFORMATION

Sibling At This School

Grade

Sibling At This School

Grade

Sibling At This School

Grade

LOCAL EMERGENCY CONTACT: A person who may be contacted if the parent/guardian is unavailable and who is authorized to pick up the student in an emergency.

1. Emergency Contact Person

Telephone Number

Relationship to Student

3. Emergency Contact Person

Telephone Number

Relationship to Student

2. Emergency Contact Person

Telephone Number

Relationship to Student

4. Emergency Contact Person

Telephone Number

Relationship to Student

TRANSPORTATION REQUESTED FOR:

MAG (Magnet)

2M (Lives 2 miles away or greater)

MD (Medical, Non Speed)

SE (Speed Related)

Hazard

Note: Please contact Special Education to arrange transportation for self-contained students.

CHOICE (NCLB)

W2M (Approved Zone Option)

PARENT/GUARDIAN SIGNATURE

DATE: 4/10/13

COMMENTS: (Mom) Change of name

from FLORES to PERDANA

(Not Student)

CCSD

CLARK COUNTY SCHOOL DISTRICT REGISTRATION FORM - Please Print Clearly

CCF-705
Rev. 02/11

NRS 392.165: STATE LAW REQUIRES ENROLLMENT OF STUDENT BY LEGAL NAME

Homeroom Teacher: FloraRoom No.: 54

STUDENT MUST BE ENROLLED BY LEGAL NAME. (As per birth certificate or other legal document)

HOME LANGUAGE SURVEY:

Parent or Guardian Must Complete:

1. First language learned by student?

☐ English ☐ ASL/Deaf☐ Other _____

2. Language spoken by student with friends?

☐ English ☐ ASL/Deaf☐ Other _____

Language used in home?

☒ English ☐ ASL/Deaf☐ Other _____

Is student 1/4 (25%) AMERICAN INDIAN or enrolled in a tribe?

☐ Yes ☐ No

SCHOOL INFORMATION

Has student ever received Special Education Services? ☐ Yes ☐ NoDoes student have a current Accommodation Plan (Section 504) in school? ☐ Yes ☐ NoHas student ever been expelled? ☐ Yes ☐ No

SCHOOL USE ONLY

w Students:

Birth Certificate ☐ Yes ☐ NoImmunizations ☐ Yes ☐ NoRecords Requested ☐ Yes ☐ NoMilitary Compact ☐ Yes ☐ No30-day Provisional Enrollment ☐ Yes ☐ No

Homeless (SAS) code: _____

All Students:

1. Proof of Address ☐ Yes ☐ NoZone Variance ☐ Yes ☐ NoResidential Affidavit ☐ Yes ☐ NoCustodial Papers/Legal Docs ☐ Yes ☐ No ☐ Pending

Student's Last Name	First Name	Middle Name	Apndg	Grade	Gender	SCHOOL USE ONLY
<u>LEWIS</u>	<u>Isabella</u>	<u>Grace</u>		<u>4th</u>	<u>Female</u>	Student ID: <u>7354466</u>
Home Address	<u>545 S. Green Valley Hwy #1524 Henderson NV</u>					Status Date: _____
Residence Phone Number	Student Cell Number	Mailing Address/P.O. Box (if Different Than Residence)	Zip Code	English Prof. _____		
<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>Same</u>	<u>89012</u>	Attend. Permit _____		
Birth Date	Birth Place (City/State/Country)	SSN # (Last four digits only)	Code _____ Date _____			
<u>08/10/06</u>	<u>Las Vegas NV</u>	<u>[REDACTED]</u>				

PARENT/GUARDIAN INFORMATION - MUST BE COMPLETED BY LEGAL PARENT/GUARDIAN

Relationship	Parent Last Name	Parent First Name, Middle Initial	Occupation	Parent First Name, Middle Initial
<u>Mother</u>	<u>PERDANO</u>	<u>MAENA</u>	<u>Health & Nutrition</u>	<u>[REDACTED]</u>
Resides With	Cell Phone Number	Parent Employer	Employer Phone	Work Ext.
<u>Yes</u> <input type="checkbox"/> No <input type="checkbox"/>	<u>[REDACTED]</u>	<u>UNCLES</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
Relationship	Parent Last Name	Parent First Name, Middle Initial	Occupation	Parent First Name, Middle Initial
<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
Resides With	Cell Phone Number	Parent Employer	Employer Phone	Work Ext.
<input type="checkbox"/> Yes <input type="checkbox"/> No	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
Mother/Guardian E-mail address:	Father/Guardian E-mail address:			
<u>[REDACTED]</u>	<u>[REDACTED]</u>			

PARENT/GUARDIAN INFORMATION ☐ Non-Custodial ☐ Joint Custody

Relationship	Parent Last Name	Parent First Name	Parent M.I.	Telephone Number
<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
Home Address	Zip Code	Extra Mailing	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>		

SCHOOL INFORMATION

Last School Attended - Name/Address/City/State Please Check One: ☐ CCSD ☐ Public ☐ Private ☐ CharterHas the student ever been enrolled in a CCSD SCHOOL? ☐ Yes ☐ No

SIBLING INFORMATION

Sibling At This School	Grade	Sibling At This School	Grade
<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>

LOCAL EMERGENCY CONTACT: A person who may be contacted if the parent/guardian is unavailable and who is authorized to pick up the student in an emergency.

1. Emergency Contact Person	Telephone Number	Relationship to Student	3. Emergency Contact Person	Telephone Number	Relationship to Student
<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
2. Emergency Contact Person	Telephone Number	Relationship to Student	4. Emergency Contact Person	Telephone Number	Relationship to Student
<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>

TRANSPORTATION REQUESTED FOR:

MAG (Magnet)	2M (Lives 2 miles away or greater)	MD (Medical, Non Sped)	SE (Sped Related)
<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
CHOICE (NCLB)	M2M (Approved Zone Option)	Hazard	
<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>	

Note: Please contact Special Education to arrange transportation for self-contained students.

PARENT/GUARDIAN SIGNATURE _____

March 23rd

DATE: _____

COMMENTS: Chg Mum's last Name3/22/13CCSD
CLARK COUNTY
SCHOOL DISTRICT

CLARK COUNTY SCHOOL DISTRICT REGISTRATION FORM - Please Print Clearly

NRS 392.165: STATE LAW REQUIRES ENROLLMENT OF STUDENT BY LEGAL NAME

Homeroom Teacher:

Room No.:

44

STUDENT MUST BE ENROLLED BY LEGAL NAME (As per birth certificate or other legal document)

HOME LANGUAGE SURVEY:

Parent or Guardian Must Complete:

1. First language learned by student?

☒ English ☐ ASL/Deaf☐ Other

2. Language spoken by student with friends?

☒ English ☐ ASL/Deaf☐ Other

Language used in home?

☒ English ☐ ASL/Deaf☐ OtherIs student $\frac{1}{8}$ (25%) AMERICAN INDIAN or enrolled in a tribe?☐ Yes ☒ No

SCHOOL INFORMATION

Has student ever received Special Education Services?

☐ Yes ☒ No

Does student have a current Accommodation Plan (Section 504) in school?

☐ Yes ☒ No

Has student ever been expelled?

☐ Yes ☒ No

Student's Last Name

LEWIS

First Name

Isabella

Middle Name

Sara

Age

11

Grade

5

Gender

Female

Home Address

595 S. Green Valley Pkwy #1504

Student Cell Number

[REDACTED]

Mailing Address/P.O. Box (If Different Than Residence)

Henderson NV

Zip Code

89012

Residence Phone Number

[REDACTED]

Birth Date

08/10/00

Birth Place (City/State/Country)

Las Vegas NV

SSN # (Last four digits only)

000-00-8888 7298

PARENT/GUARDIAN INFORMATION - MUST BE COMPLETED BY LEGAL PARENT/GUARDIAN

Relationship

Mother

Parent Last Name

PERDINO

Parent First Name, Middle Initial

MAREN

Occupation

CBI II

Employer Phone

[REDACTED]

Work Ex.

[REDACTED]

Work Hours

[REDACTED]

Resides With

☒ Yes ☐ No

Cell Phone Number

[REDACTED]

Parent Employer

[REDACTED]

Occupation

[REDACTED]

Employer Phone

[REDACTED]

Work Ex.

[REDACTED]

Work Hours

[REDACTED]

Relationship

Father

Parent Last Name

LEWIS

Parent First Name, Middle Initial

[REDACTED]

Occupation

[REDACTED]

Employer Phone

[REDACTED]

Work Ex.

[REDACTED]

Work Hours

[REDACTED]

Resides With

☐ Yes ☒ No

Cell Phone Number

[REDACTED]

Parent Employer

[REDACTED]

Occupation

[REDACTED]

Employer Phone

[REDACTED]

Work Ex.

[REDACTED]

Work Hours

[REDACTED]

Mother/Guardian E-mail address:

[REDACTED]

Father/Guardian E-mail address:

[REDACTED]

PARENT/GUARDIAN INFORMATION

☐ Non-Custodial☒ Joint Custody

Relationship

Parent Last Name

Parent First Name

[REDACTED]

Parent M.I.

[REDACTED]

Telephone Number

[REDACTED]

Home Address

[REDACTED]

SCHOOL INFORMATION

Last School Attended - Name/Address/City/State Please Check One: ☐ CCSD ☐ Public ☐ Private ☐ CharterHas the student ever been enrolled in a CCSD SCHOOL? ☒ Yes ☐ No

SIBLING INFORMATION

Sibling At This School

Grade

Sibling At This School

Grade

Sibling At This School

Grade

LOCAL EMERGENCY CONTACT: A person who may be contacted if the parent/guardian is unavailable and who is authorized to pick up the student in an emergency.

1. Emergency Contact Person

Lisa Clark

Telephone Number

[REDACTED]

Relationship to Student

Friend

3. Emergency Contact Person

Corrado Balis

Telephone Number

[REDACTED]

Relationship to Student

Grandmother

2. Emergency Contact Person

Olga Lewis

Telephone Number

[REDACTED]

Relationship to Student

Grandmother

4. Emergency Contact Person

[REDACTED]

Telephone Number

[REDACTED]

Relationship to Student

[REDACTED]

TRANSPORTATION REQUESTED FOR:

MAG (Magrel)

[REDACTED]

2M (Lives 2 miles away or greater)

[REDACTED]

MD (Medical, Non SpEd)

[REDACTED]

SE (SpEd Related)

[REDACTED]

Note: Please contact Special Education to arrange transportation for self-contained students.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PARENT/GUARDIAN SIGNATURE

[REDACTED]

DATE: 4/10/13

COMMENTS:

April 10th 2013

?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Room No.: 44/5

Homerom Teacher: 29.11.2023

Room No.: 405

Note: Please contact Special Education to arrange for self-contained students.

COMMENTS:

1000

CLARK COUNTY SCHOOL DISTRICT REGISTRATION FORM - Please Print Clearly

NRS 392.165: STATE LAW REQUIRES ENROLLMENT OF STUDENT BY LEGAL NAME

Homeroom Teacher: *Michelle S*Room No.: *46*STUDENT MUST BE ENROLLED
BY LEGAL NAME. (As per birth
certificate or other legal document)

HOME LANGUAGE SURVEY:

Parent or Guardian Must Complete

1. First language learned by student?

☐ English ☐ ASL/Deaf☐ Other2. Language spoken by student
with friends?☐ English ☐ ASL/Deaf☐ Other☐ English ☐ ASL/Deaf☐ OtherIs student 1/4 (25%) AMERICAN
INDIAN or enrolled in a tribe?☐ Yes ☐ NoHas student ever received Special
Education Services? ☐ Yes ☐ NoDoes student have a current
Accommodation Plan (Section 504)
in school? ☐ Yes ☐ No

Has student ever been expelled?

☐ Yes ☐ No

SCHOOL INFORMATION

w Students:

Birth Certificate ☐ Yes ☐ NoImmunizations ☐ Yes ☐ NoRecords Requested: ☐ Yes ☐ NoMilitary Compact ☐ Yes ☐ No30-day Provisional Enrollment ☐ Yes ☐ NoHomeschool (SAS model) ☐ Yes ☐ No

SCHOOL USE ONLY

MAY 15 2014

STUDENT'S LAST NAME

First Name

Middle Name

Apndg

Grade

Gender

Home Address

Student Cell Number

Mailing Address/P.O. Box (if Different Than Residence)

Zip Code

Birth Date

Birth Place (City/State/Country)

SSN # (Last four digits only)

PARENT/GUARDIAN INFORMATION - MUST BE COMPLETED BY LEGAL PARENT/GUARDIAN

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

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Occupation

Employer Phone

Work Ext.

Work Hours

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Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

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Parent Last Name

Parent First Name, Middle Initial

Resides With

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Work Ext.

Work Hours

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Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

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Parent First Name, Middle Initial

Resides With

Cell Phone Number

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Work Ext.

Work Hours

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Parent First Name, Middle Initial

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Parent First Name, Middle Initial

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Parent First Name, Middle Initial

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Parent First Name, Middle Initial

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Work Hours

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Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

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Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

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Work Hours

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Work Hours

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Cell Phone Number

Parent Employer

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Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

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Employer Phone

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Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

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Cell Phone Number

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Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Work Hours

Relationship

Parent Last Name

Parent First Name, Middle Initial

Resides With

Cell Phone Number

Parent Employer

Occupation

Employer Phone

Work Ext.

Exhibit “A3”



Date: Thursday, June 12, 2014 2:03 PM

From: Wesley Lewis <info4WLewis@yahoo.com>

To: Mom <oalewis@cox.net>

Subject: Fwd: Text conversation for Isabella

Sent from Wesley Lewis

Begin forwarded message:

From: Wesley Lewis <info4WLewis@yahoo.com>

Date: June 12, 2014 1:57:19 PM PDT

To: Maria Daniela Perdomo <perdomomda@gmail.com>

Subject: Text conversation for Isabella

HOME 3G 1:49 PM 57%

Messages Maria Perdomo Edit

May 26, 2014 9:01 AM

Wesley

Hi Maria: it's 9:00am I'm waiting outside your place for Bella.

Jun 11, 2014 4:53 PM

I'm running late. I'll be there to pick her up at 6:30

Maria

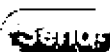
Wesley

That's fine no problem.

Jun 12, 2014 1:14 PM

Maria

My family is coming next week on Wednesday morning and leaving on Friday. Would you like to trade a day. This Sunday for 1pm? They wanna



Page (1)

A-3

829 (1)

HOME 3G 1:50 PM 57%

Messages

Maria Perdomo

Edit

It's not that complicated

Isabella wants to be with my parents. If it was per me I can wait until 6. I'm doing it for them

Maria... I'm on the floor working ... That's not too hard to understand is it ?

Ok I'll get a answer to you by 6 ok.

Ok so yes or no?

If yes then pick her up on Sunday if not then pick her up at 9am on Monday



Send

S

(2)

27-2

(2)

HOME 3G 1:49 PM 57%

Messages Maria Perdomo Edit

Jun 12, 2014 1:43 PM

Well this Sunday is fathers day I was already expecting to pick her up at 9:00 am. I already requested that day off to spend with her.

Wesley

I don't think so. The custody order was changed

Maria

But the 1pm Wednesday pick up doesn't sound like I'd have a problem with that.

Wesley

Maria

You can pick her up at 1



Send

page (3)

ε. A

(S) 1940

HOME 3G

1:49 PM

57%

Messages

Maria Perdomo

Edit

Yeah the custody was
changed for our days but
not for holidays and such.
But I'll double check.

Wesley

Maria Check n let me know

Maria When can you let me
know by?Maria I need to make
reservations for my
parents

After I get off work
tonight sometime after
7ish

Wesley

Maria Make a desicion now then



Send

(4)

A-3
46

E-4

24

HOME 3G

1:50 PM

57%

Messages

Maria Berdono

Edit

Maria ... I'm on the floor
working ... That's not to
hard to understand is it ?

Wesley

Ok I'll get a answer to you
by 6 ok

Wesley

Ok so yes or no?

Maria

If yes then pick her up on
Sunday if not then pick
her up at 9am on Monday

Maria

I'm not waiting that long

Maria

You know what for get it

Maria

See you on Monday

Maria

o Send

I hope we can resolve this without unneeded complications....

Regards

Wesley Lewis

sent from Wesley Lewis

(5)

A-3

—

—

—

8-4

20

Exhibit “A4”

Maria Perdomo
Wesley Lewis

2/27/14 11:30 PM

To: "info4WLewis@yahoo.com" <info4WLewis@yahoo.com>
Sent: Tuesday, September 24, 2013 7:12 PM
Subject: Isabella's Psychologist Appointment

Wesley,

I am writing to you regarding Isabella's appointment with the psychologist as suggested by Dr Heath Hodapp, on August 8th medical examination we both attend to at St. Rose Pediatrics.

I am letting you know that I have scheduled an appointment with Dr Warren Wheatley from Oasis Counseling LLC, this next Saturday September 28th at 10:00 am and your presence is required.

Directions:
2360 W. Horizon Ridge Parkway, Suite
120, Henderson, NV 89052
(702) 294 0433
<http://www.oasiscounselingtoday.com/>

Consultation price is 100.00 USD per hour.
Ps: could you please check that Isabella's phone is turn on as I have been trying to call her several times after school and I haven't able to talk to her.

Regards,

Maria Perdomo

Sent from my iPhone

Maria Daniela Perdomo <perdomomda@gmail.com>
To: juanfuentec@gmail.com

Sat, Oct 5, 2013 at 12:36 PM

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: October 5, 2013, 11:41:31 AM PDT
To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>
Subject: Confirmation for Isabella's appointment

<https://mail.google.com/mail/u/0/?ui=2&ik=b8d4715031&view=pt&search=sent&th=14189ecc2cb71c58>

Page 3 of 4

(1)



Maria Daniela Perdomo <perdomomda@gmail.com>

Confirmation for Isabella's appointment

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 11:41 AM

Correction, Isabella's appointment is at 3:00 pm today not at 2:30. We hope to see you there. Please confirm if you can attend.

Sincerely,
Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>

Date: October 4, 2013, 7:36:57 PM PDT

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Subject: Isabella's Psychologist Appointment has changed

Wesley,

Please be aware that Warren Wheatley canceled this afternoon's appointment on the last minute, due to personal reasons. He reschedule for tomorrow after 2:30 pm.

I have not receive any confirmation of your assistance, please let me know if you will be able to attend tomorrow. If you cannot, Warren will contact you directly to schedule a meeting.

Sorry for any inconveniences this may cause.

Sincerely,

Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>

Date: September 29, 2013, 7:18:45 PM PDT

To: Wesley Allen Lewis <info4WLewis@yahoo.com>

Subject: Fwd: Isabella's Psychologist Appointment

Wesley,

I am writing to you to inform you that the psychologist evaluated Isabella and determined that she is having a depression, so she is going to start seeing Dr. Warren Wheatley once per week. The next appointment will be Friday, October 4th @ 6:00 pm at Oasis Counseling.

I am letting you know in advance so you can plan your schedule and be able to attend.

Sincerely,

Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: September 25, 2013, 8:59:12 PM PDT
To: Wesley Lewis <info4wlewis@yahoo.com>
Subject: Re: Isabella's Psychologist Appointment

Wesley,

I am sorry but the appointment cannot be rescheduled. Hope you can clear your agenda and make it on Saturday Sept 28th, if you cannot then I will inform you the outcome.

Sincerely,

Maria Perdomo

Sent from my iPhone

On Sep 25, 2013, at 3:47 PM, Wesley Lewis <info4wlewis@yahoo.com> wrote:

Maria

I'm quite sure that had a typo when informing of the date of Isabella's appointment ... "this" followed by "next" Sat. the 28th doesn't make sense ..and isn't adequate time for me to make arrangements to attend..please reschedule the appointment due to the sensitive nature of the appointment. thanks again, as for her phone its on and you talked with her by calling the land line tues afternoon.. so let me know the date of the rescheduled appointment so I can attend thanks maria..
Wesley Lewis

From: Maria Daniela Perdomo <perdomomda@gmail.com>



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's DR. Appointment

2 messages

Wesley Lewis <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 1:12 PM

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Maria if you could please give proper notice for me to attend Isabellas doctors appointments I rescheduled my schedule to attend her appointment on the fourth you did not inform me that the DR. canceled the 4th and rescheduled it for the fifth at 2:30 which gave me exactly around what 16 hours notice after I did send you text messages and I did try to call Isabella's phone. You sent me a email at 7:38 PM after I send you text messages at 6:00 PM to wonder where this doctors office was you respond in ways that are not helpful to coparenting please all I'm asking is consideration for others

Sent from Wesley Lewis

Maria Daniela Perdomo <perdomomda@gmail.com>
To: juanfuentec@gmail.com

Sat, Oct 5, 2013 at 2:42 PM

Sent from my iPhone

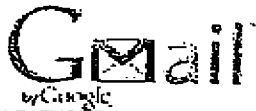
Begin forwarded message:

From: Wesley Lewis <info4WLewis@yahoo.com>
Date: October 5, 2013, 1:12:13 PM PDT
To: "perdomomda@gmail.com" <perdomomda@gmail.com>
Subject: Isabella's DR. Appointment

Maria if you could please give proper notice for me to attend Isabellas doctors appointments I rescheduled my schedule to attend her appointment on the fourth you did not inform me that the DR. canceled the 4th and rescheduled it for the fifth at 2:30 which gave me exactly around what 16 hours notice after I did send you text messages and I did try to call Isabella's phone. You sent me a email at 7:38 PM after I send you text messages at 6:00 PM to wonder where this doctors office was you respond in ways that are not helpful to coparenting please all I'm asking is consideration for others

Sent from Wesley Lewis

(4)



Maria Daniela Perdomo <perdomomda@gmail.com>

Respectful parenting and proper advance notice of appointment changes

2 messages

Wesley Lewis <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 2:27 PM

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Maria I called the doctors office Dr. Wheatley's office and they're not open on the weekends so if I'm not able to even get in contact with the doctor on my own account to understand how this appointment was rescheduled after being canceled due to the doctors personal reasons I feel it's in best interest if it would be rescheduled at a different time where everybody could attend and I can contact the doctor on the day of their operational hours I don't know how this doctor is at his office when the office is closed it makes it rather frustrating on my side due to the short notice and due to lack of communication thanks again

Regards

Wesley Lewis

Sent from Wesley Lewis

Maria Daniela Perdomo <perdomomda@gmail.com>

Sat, Oct 5, 2013 at 2:41 PM

To: juanfuentec@gmail.com

Sent from my iPhone

Begin forwarded message:

From: Wesley Lewis <info4WLewis@yahoo.com>

Date: October 5, 2013, 2:27:12 PM PDT

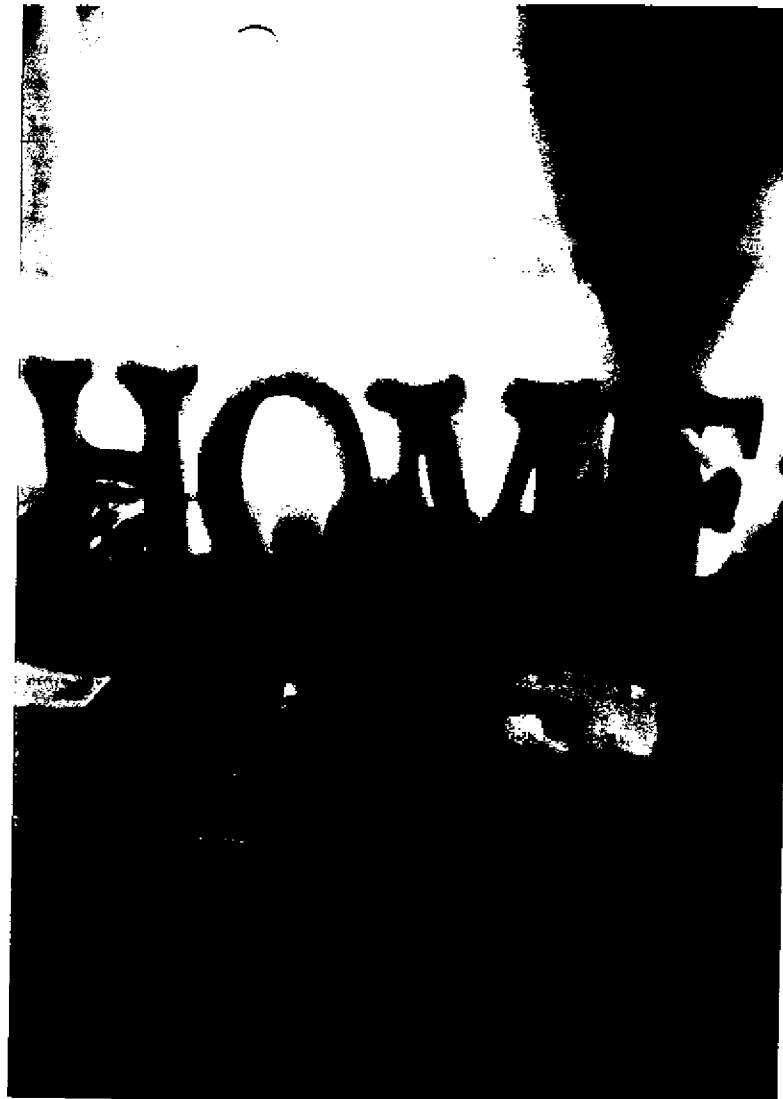
To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Subject: Respectful parenting and proper advance notice of appointment changes

[Quoted text hidden]

(5)

Exhibit “*HS*”

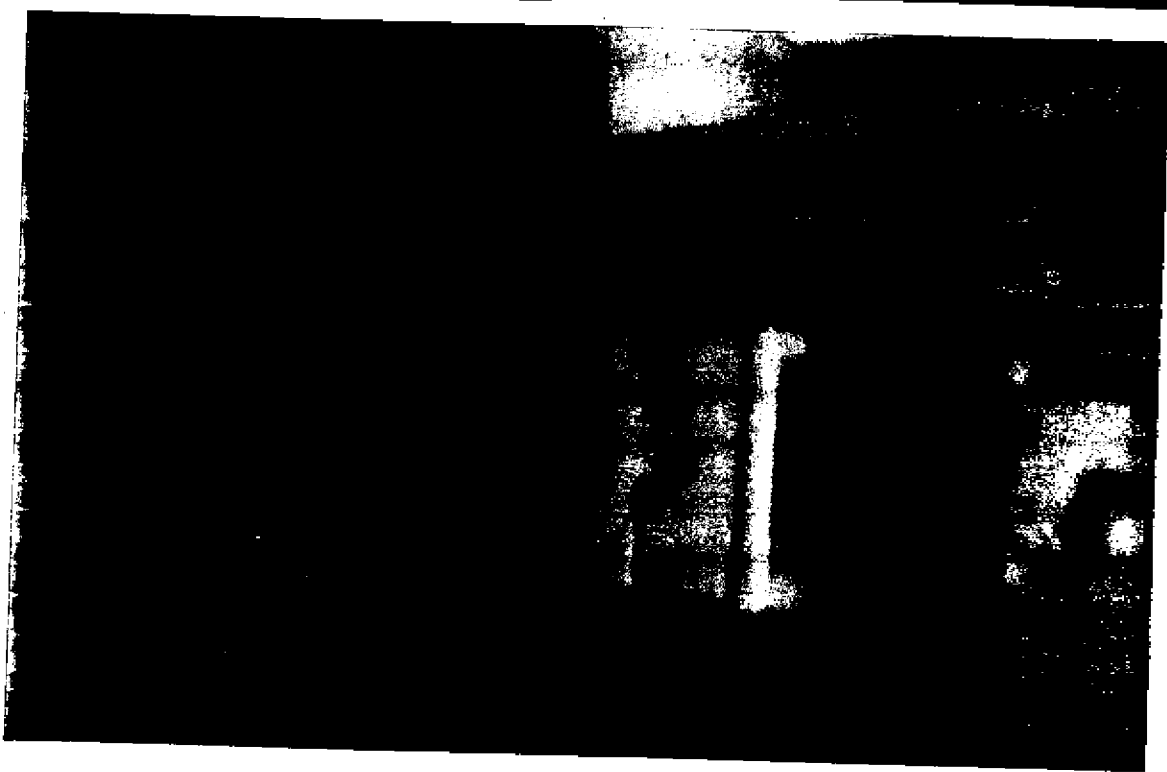
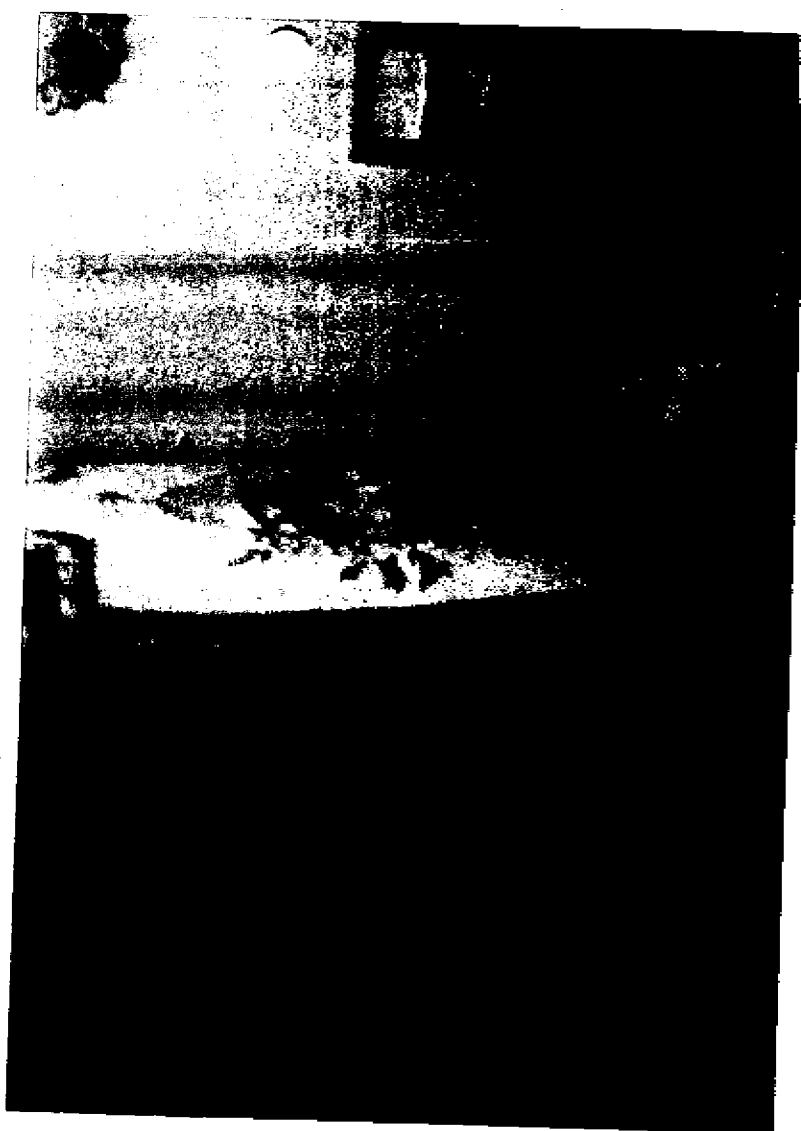
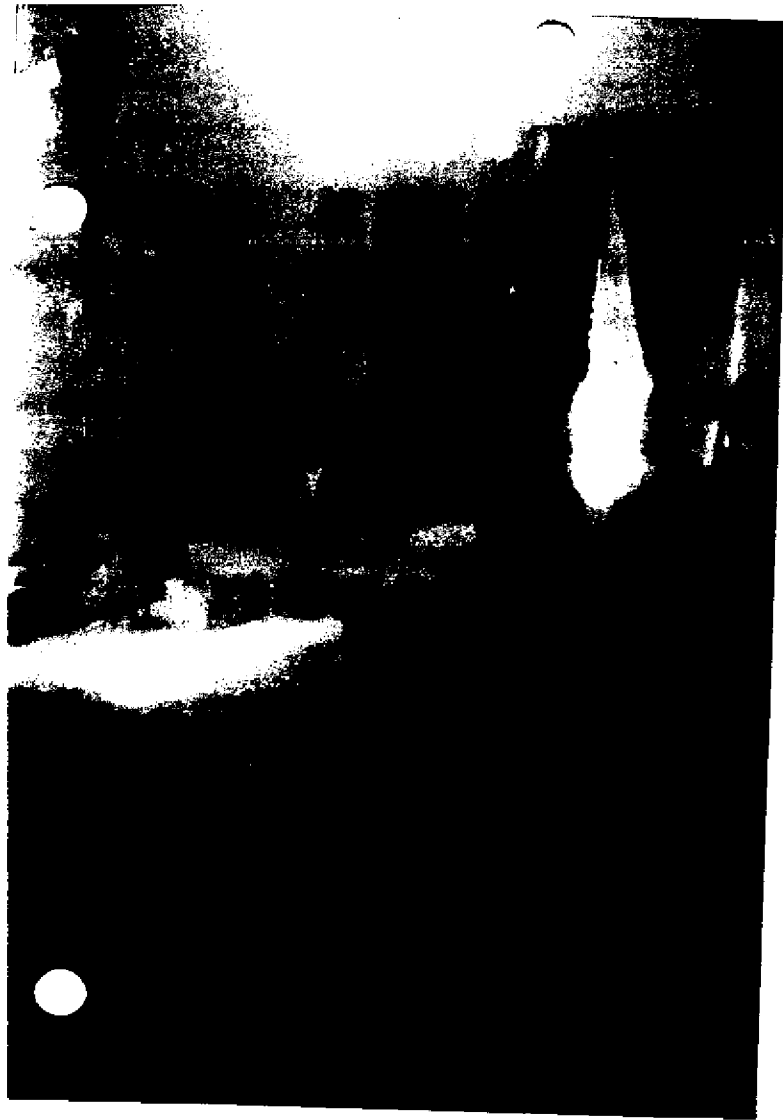


Daughter,
Isabella's
Bed
Room

EXhibit A-5

1571000000
2411000000
0901
110000

2-A 1100000000

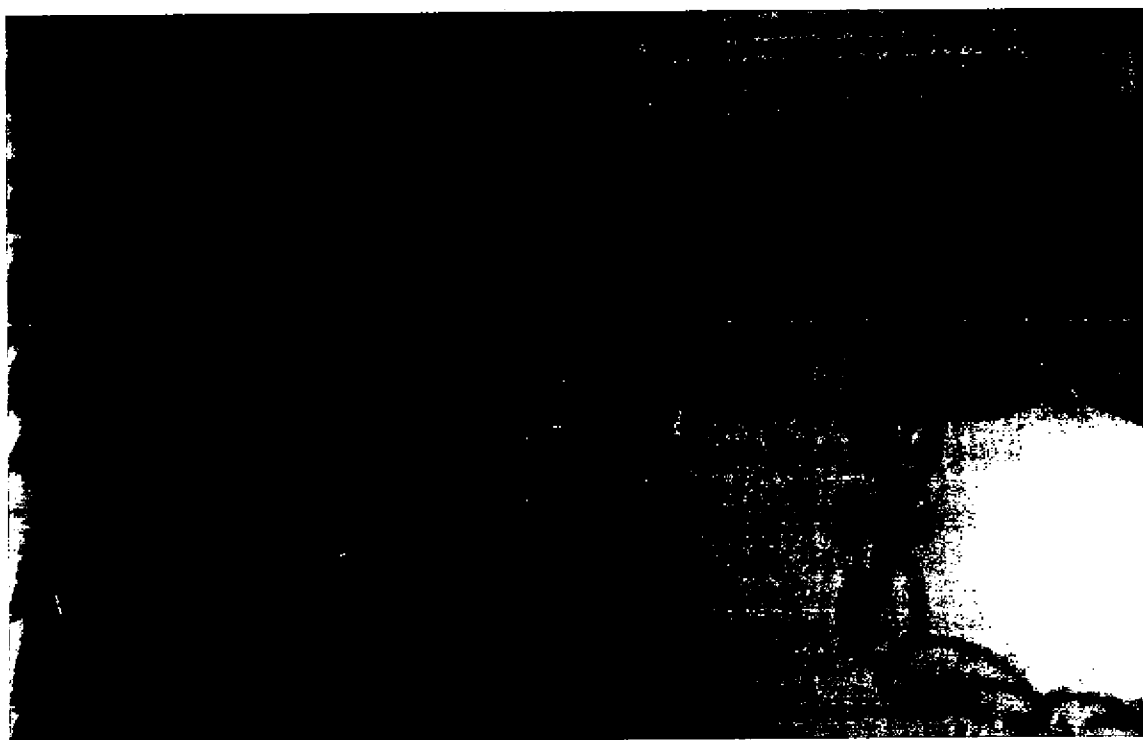


Daughter
Isabella's
Bedroom
Side
View

Exhibit 115

Davidson
Halliday
Machin
Shaw
Wright

27/10/19



DAD
Wesley's
Bed
Room

Exhibit A-5

Room
Bed
Westley's
DAD

Exhibit 11-11-12



Neil C. Twitchell

Outstanding Achievement

This award is presented to Isabella Lewis
for A/B HONOR ROLL
Presented this 4th day of June, 2014

Mrs. Burress
Teacher

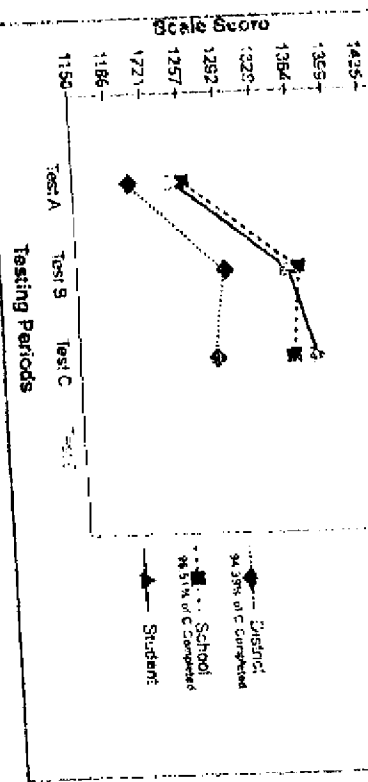
Mrs. Woshell
Principal

"Inspiring A Passion For Life-Long Learning"

Lewis, Isabella S
 Grade 1
 School Year: 2013-2014
 NV Common Core Math Grade 1 (ABCD)
 Generated: March 18, 2014

Proficiency of student
 Level 1
 Level 2
 Level 3
 Level 4
 Determined by # correct

Growth Comparison to School & District



Overall Subject Summary

	Test A	Test B	Test C	Test D
Number Correct	19/20	20/20	25/20	12
Percent Correct	95%	100%	125%	60%
Scale Score	1249	1357	1383	719
Proficiency Level	Level 3	Level 4	Level 4	Level 2
National Percentile	55	79	78	72

Performance by Standard Summary

Reporting Category	Test A	Test B	Test C	Test D
Operations	1.OA.1 Add and Subtract V 1.OA.2 Word Problems: Add 1.OA.3 Properties of Addition 1.OA.4 Subtraction as Addition 1.OA.5 Relate Counting 1.OA.6 Addition and Subtraction 1.OA.7 Understand Equality 1.OA.8 Find Unknown in A	1.OA.1 Add and Subtract V 1.OA.2 Word Problems: Add 1.OA.3 Properties of Addition 1.OA.4 Subtraction as Addition 1.OA.5 Relate Counting 1.OA.6 Addition and Subtraction 1.OA.7 Understand Equality 1.OA.8 Find Unknown in A	1.OA.1 Add and Subtract V 1.OA.2 Word Problems: Add 1.OA.3 Properties of Addition 1.OA.4 Subtraction as Addition 1.OA.5 Relate Counting 1.OA.6 Addition and Subtraction 1.OA.7 Understand Equality 1.OA.8 Find Unknown in A	Unavailable
Base Ten	1.NBT.1 Counting, Representing 1.NBT.2 Place Value 1.NBT.3 Compare Whole Numbers 1.NBT.4 Add Whole Numbers 1.NBT.5 Subtract Multiples	1.NBT.1 Counting, Representing 1.NBT.2 Place Value 1.NBT.3 Compare Whole Numbers 1.NBT.4 Add Whole Numbers 1.NBT.5 Subtract Multiples	1.NBT.1 Counting, Representing 1.NBT.2 Place Value 1.NBT.3 Compare Whole Numbers 1.NBT.4 Add Whole Numbers 1.NBT.5 Subtract Multiples	Unavailable
Measurement & Data	1.MD.1 Compare and Order 1.MD.2 Express Length 1.MD.3 Tell Time, Write Time 1.MD.4 Represent and Interpret	1.MD.1 Compare and Order 1.MD.2 Express Length 1.MD.3 Tell Time, Write Time 1.MD.4 Represent and Interpret	1.MD.1 Compare and Order 1.MD.2 Express Length 1.MD.3 Tell Time, Write Time 1.MD.4 Represent and Interpret	Unavailable
Geometry	1.G.1 Defining Attributes of Shapes 1.G.2 Compose Shapes and Patterns 1.G.3 Partition Circles and Rectangles	1.G.1 Defining Attributes of Shapes 1.G.2 Compose Shapes and Patterns 1.G.3 Partition Circles and Rectangles	1.G.1 Defining Attributes of Shapes 1.G.2 Compose Shapes and Patterns 1.G.3 Partition Circles and Rectangles	Unavailable

Answers

Test A	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
Test B	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
Test C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
Test D	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30

☒ Correct Answer ☒ Incorrect Answer (Student's Answer Shown) ☒ Student Did Not Answer ☒ Unused Item

	Interim 1	Interim 2	Interim 3	Final
Special Subjects				
Art	Satisfactory progress	Satisfactory progress		
Humanities	Satisfactory progress	Exceptional progress		
Library	Exceptional progress	Exceptional progress		
Music	Exceptional progress	Exceptional progress		
PE	Exceptional progress	Exceptional progress		
Successful Learner Behaviors				
Observes School Rules	Exceptional progress	Exceptional progress		
Follows Classroom Rules	Exceptional progress	Satisfactory progress		
Follows Directions	Satisfactory progress	Satisfactory progress		
Accepts Responsibility	Satisfactory progress	Satisfactory progress		
Works Independently	Exceptional progress	Exceptional progress		
Works Cooperatively	Exceptional progress	Exceptional progress		
Completes and Returns Homework on Time	Satisfactory progress	Satisfactory progress		
Quality of Work	Exceptional progress	Exceptional progress		
Attendance Record				
Days Absent	2	5		
Times Tardy	6	8		
Days Present	63	53		

Learner Progress Scales

Knowledge of Work - Overall summary grade for content area.
A- 90-100% mastery of grade level standard
B- 80-89% mastery of grade level standard
C- 70-79% mastery of grade level standard
D- 60-69% mastery of grade level standard
F- Below 60% mastery of grade level standard
W- Working on standards below grade level (see attachment)

Special Subjects and Learner Behaviors
Exceptional progress
Satisfactory progress
Needs improvement

Teacher Comments - 1st Trimester

Isabella scored 53 wpm on the AIMSweb assessment, which is above-grade level. In order to challenge her, she is currently reading beginner chapter books with her reading group. We have discussions about the plot, characters, and setting and she is able to contribute to the group. She enjoys reading to the class and picks out wonderful books we like to hear. Occasionally, Isabella needs reminders to complete unfinished school work or centers in her desk folder. She can work on being more responsible by completing this in a more timely manner and without being told. Isabella is a kind, polite girl who consistently follows directions and classroom rules. She is also a straight-A student.

Teacher Comments - 2nd Trimester

This trimester, Isabella scored 112 wpm on the AIMSweb assessment, which is well-above grade level. Her reading group continues to read beginner chapter books and has discussions about what was read. She continues to show enthusiasm with reading to the class. Lately, Isabella has had a difficult time answering questions during Saxon Phonics and can be easily distracted. Many times throughout the day, I will catch her looking from behind, while she is supposed to be completing assignments at her desk. She requires more time to complete seat work compared to others and needs redirection. Isabella takes pride in her writing and completes amazing illustrations. She shows a lot of passion with art. She lights up and is excited to share her accomplishments with classmates. Isabella is an A-B Honor Roll student.

Teacher Comments - 3rd Trimester

Gail Burgess

Teacher's Signature

Exhibit “*A6*”

Maria Perdomo
Wesley Lewis

2/27/14 11:30 PM

To: "info4WLewis@yahoo.com" <info4WLewis@yahoo.com>
Sent: Tuesday, September 24, 2013 7:12 PM
Subject: Isabella's Psychologist Appointment

Wesley,

I am writing to you regarding Isabella's appointment with the psychologist as suggested by Dr Heath Hodapp, on August 8th medical examination we both attend to at St. Rose Pediatrics.

I am letting you know that I have scheduled an appointment with Dr Warren Wheatley from Oasis Counseling LLC, this next Saturday September 28th at 10:00 am and your presence is required.

Directions:
2360 W. Horizon Ridge Parkway, Suite
120, Henderson, NV 89052
(702) 294 0433
<http://www.oasiscounselingtoday.com/>

Consultation price is 100.00 USD per hour.
Ps: could you please check that Isabella's phone is turn on as I have been trying to call her several times after school and I haven't able to talk to her.

Regards,

Maria Perdomo

Sent from my iPhone

Maria Daniela Perdomo <perdomomda@gmail.com>
To: juanfuentec@gmail.com

Sat, Oct 5, 2013 at 12:36 PM

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: October 5, 2013, 11:41:31 AM PDT
To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>
Subject: Confirmation for Isabella's appointment

<https://mail.google.com/mail/u/0/?ui=2&ik=b8d4715031&view=pt&search=sent&th=14189ecc2cb71c58>



Maria Daniela Perdomo <perdomomda@gmail.com>

Confirmation for Isabella's appointment

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 11:41 AM

Correction, Isabella's appointment is at 3:00 pm today not at 2:30. We hope to see you there. Please confirm if you can attend.

Sincerely,
Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>

Date: October 4, 2013, 7:36:57 PM PDT

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Subject: Isabella's Psychologist Appointment has changed

Wesley,

Please be aware that Warren Wheatley canceled this afternoon's appointment on the last minute, due to personal reasons. He reschedule for tomorrow after 2:30 pm.

I have not receive any confirmation of your assistance, please let me know if you will be able to attend tomorrow. If you cannot, Warren will contact you directly to schedule a meeting.

Sorry for any inconveniences this may cause.

Sincerely,

Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>

Date: September 29, 2013, 7:18:45 PM PDT

To: Wesley Allen Lewis <info4WLewis@yahoo.com>

Subject: Fwd: Isabella's Psychologist Appointment

Wesley,



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's DR. Appointment

2 messages

Wesley Lewis <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 1:12 PM

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Maria if you could please give proper notice for me to attend Isabellas doctors appointments I rescheduled my schedule to attend her appointment on the fourth you did not inform me that the DR. canceled the 4th and rescheduled it for the fifth at 2:30 which gave me exactly around what 16 hours notice after I did send you text messages and I did try to call Isabella's phone. You sent me a email at 7:38 PM after I send you text messages at 6:00 PM to wonder where this doctors office was you respond in ways that are not helpful to coparenting please all I'm asking is consideration for others

Sent from Wesley Lewis

Maria Daniela Perdomo <perdomomda@gmail.com>
To: juanfuentec@gmail.com

Sat, Oct 5, 2013 at 2:42 PM

Sent from my iPhone

Begin forwarded message:

From: Wesley Lewis <info4WLewis@yahoo.com>

Date: October 5, 2013, 1:12:13 PM PDT

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Subject: Isabella's DR. Appointment

Maria if you could please give proper notice for me to attend Isabellas doctors appointments I rescheduled my schedule to attend her appointment on the fourth you did not inform me that the DR. canceled the 4th and rescheduled it for the fifth at 2:30 which gave me exactly around what 16 hours notice after I did send you text messages and I did try to call Isabella's phone. You sent me a email at 7:38 PM after I send you text messages at 6:00 PM to wonder where this doctors office was you respond in ways that are not helpful to coparenting please all I'm asking is consideration for others

Sent from Wesley Lewis

(3)



Maria Daniela Perdomo <perdomomda@gmail.com>

Respectful parenting and proper advance notice of appointment changes

2 messages

Wesley Lewis <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 2:27 PM

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Maria I called the doctors office Dr. Wheatley's office and they're not open on the weekends so if I'm not able to even get in contact with the doctor on my own account to understand how this appointment was rescheduled after being canceled due to the doctors personal reasons I feel it's in best interest if it would be rescheduled at a different time where everybody could attend and I can contact the doctor on the day of their operational hours I don't know how this doctor is at his office when the office is closed it makes it rather frustrating on my side due to the short notice and due to lack of communication thanks again

Regards

Wesley Lewis

Sent from Wesley Lewis

Maria Daniela Perdomo <perdomomda@gmail.com>

Sat, Oct 5, 2013 at 2:41 PM

To: juanfuentec@gmail.com

Sent from my iPhone

Begin forwarded message:

From: Wesley Lewis <info4WLewis@yahoo.com>

Date: October 5, 2013, 2:27:12 PM PDT

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Subject: Respectful parenting and proper advance notice of appointment changes

[Quoted text hidden]

Exhibit “A.1”

Encounter Summary
ISABELLA LEWIS (Sex: F, DOB: 08/10/2006)
Date of Visit: 05/01/2014

Chief Complaint

f/u for strep, pain on both legs

pain now resolved
no fever
tol po no v/d
finished abx, got rash with amoxil on day 9
no problems now
no swelling or redness in legs

ROS Findings

Eyes: Denies red eyes or eye drainage, photophobia, double vision, floaters or blind spots, change in visual fields, change in color perception or haloes around objects.

Patient History

Allergies History reviewed and *updated*, pertinent for:
Allergies/Reactions Reviewed by Michael Argarin (325) 05/01/2014 15:40:17
amoxicillin hives 2/10/14
E930.0 ADVERSE EFFECT OF PENICILLINS

Medication List Reviewed by Michael Argarin (325) 05/01/2014 15:40:19

Medications Reviewed

Zithromax suspension for reconstitution 200 mg/5 mL

Vital Signs

Temp (TA): 98.5F / 36.9c @15:40
Weight: 47lb 4oz / 21.48kg (18 %ile)

Exam Findings

Constitutional: Normal general appearance: alert, pleasant, not ill appearing, no distress.

Eyes: Normal conjunctivae & lids: pink & moist.

Ears, Nose, Mouth, Throat: Normal canals & TMs: clear with normal landmarks & light reflex; nares: clear;
oropharynx: moist mucous membranes, without pharyngeal erythema or intraoral lesions.

Neck: Normal neck: supple, trachea midline, no masses or significant adenopathy; without meningeal signs; thyroid:
no enlargement or mass.

Respiratory: Normal respiratory effort: no retractions, no tachypnea; auscultation of lungs: clear & equal breath
sounds without rales, rhonchi or wheeze.

Cardiovascular: Normal palpation of heart: PMI nondisplaced; auscultation of heart: regular rate & rhythm, no
murmur.

Gastrointestinal: Normal abdomen: soft, nontender/nondistended, normal bowel sounds, no mass; liver & spleen: no
hepatosplenomegaly.

Skin: Normal inspection: no rash.

Assessment

strep throat resolved

DX 1: 034.0 STREP PHARYNGITIS

Plan

RTC if body aches return for fever or change in symptoms

Procedures

100

Encounter Summary
IS ELLA LEWIS (Sex: F, DOB: 08/10/2006)
Date of Visit: 05/01/2014

99213 OFFICE/OUTPATIENT VISIT, EST

Patient accompanied by: Both Parents
Rendering Provider: Heath Hodapp, MD (317)
Assisted By: Michael Argarin (325)
Finalized By: Heath Hodapp, MD (317) 05/05/2014 07:25 AM

	05/01/2014
Electronically Signed by: Heath Hodapp, MD	Date
License Number: 9481	

Exhibit “*A8*”



PAYMENT RECORD as of 2014-06-08

Payments Received between 1999-01-01 and 2014-06-08

SUMMARY for LEWIS, WESLEY ALLEN

Case ID	CST Full Name	Total Monthly Amount Owed	Total Disbursed to Custodian	Total Retained by the State
800342200A	PERDOMO, MARIA DANIELA	\$241.00	\$5,707.26	\$0.00
	Sum:	\$241.00	\$5,707.26	\$0.00

**DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 E. FLAMINGO RD SUITE 100
LAS VEGAS NV 89119**



Nevada Child Support Enforcement

PAYMENT RECORD as of 06-08-2014
Payments Received between 01-01-1999 and 06-08-2014
Total Number of Cases Retrieved: 1

Payor:

LEWIS, WESLEY ALLEN

Case ID:

800342200A

Custodial Parent:

PERDOMO, MARIA DANIELA

Case Status:

ACTIVE

Docket Number:

D-10-427054-D

Statement prepared by:

MOSSFR

Cur Order Eff Date: 12-27-2013

Payment Total for

Requested Time frame:

\$5,707.26

CURRENT MONTH OBLIGATION

Provision Type	Current Support	Arrears	Total Monthly Amount
Child Support	\$91.00	\$100.00	\$191.00
Medical Cash	\$50.00	\$0.00	\$50.00

PAYMENTS RECEIVED BETWEEN 01-01-1999 AND 06-08-2014

#	Distribution Date	Distribution Source	Distribution Amount	Order Eff Date	Applied to Provision	Disbursed To
1	06-02-2014	IW	\$91.00	12-27-2013	Child Support	CUSTODIAN
2	06-02-2014	IW	\$22.23	12-27-2013	Medical Cash	CUSTODIAN
3	05-19-2014	IW	\$85.46	12-27-2013	Child Support	CUSTODIAN
4	05-19-2014	IW	\$27.77	12-27-2013	Medical Cash	CUSTODIAN
5	05-05-2014	IW	\$91.00	12-27-2013	Child Support	CUSTODIAN
6	05-05-2014	IW	\$22.23	12-27-2013	Medical Cash	CUSTODIAN
7	04-29-2014	NP	\$500.00	12-27-2013	Child Support	CUSTODIAN
8	04-21-2014	IW	\$85.46	12-27-2013	Child Support	CUSTODIAN
9	04-21-2014	IW	\$27.77	12-27-2013	Medical Cash	CUSTODIAN
10	04-18-2014	NP	\$500.00	12-27-2013	Child Support	CUSTODIAN
11	04-07-2014	IW	\$91.00	12-27-2013	Child Support	CUSTODIAN
12	04-07-2014	IW	\$22.23	12-27-2013	Medical Cash	CUSTODIAN
13	03-24-2014	IW	\$85.46	12-27-2013	Child Support	CUSTODIAN
14	03-24-2014	IW	\$27.77	12-27-2013	Medical Cash	CUSTODIAN
15	03-10-2014	IW	\$91.00	12-27-2013	Child Support	CUSTODIAN
16	03-10-2014	IW	\$22.23	12-27-2013	Medical Cash	CUSTODIAN
17	02-26-2014	NP	\$150.00	12-27-2013	Child Support	CUSTODIAN
18	02-26-2014	NP	\$50.00	12-27-2013	Medical Cash	CUSTODIAN
19	10-07-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
20	09-23-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
21	09-09-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
22	08-26-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
23	08-12-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
24	07-29-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
25	07-15-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
26	07-01-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
27	06-17-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
28	06-03-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
29	05-20-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
30	05-06-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
31	04-22-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN



Nevada Child Support Enforcement

PAYMENT RECORD as of 06-08-2014

Payments Received between 01-01-1999 and 06-08-2014

Total Number of Cases Retrieved: 1

Payor:

LEWIS, WESLEY ALLEN

Case ID:

800342200A

Custodial Parent:

PERDOMO, MARIA DANIELA

Case Status:

ACTIVE

Docket Number:

D-10-427054-D

Statement prepared by:

MOSSFR

Cur Order Eff Date:

12-27-2013

Payment Total for

Requested Time frame:

\$5,707.26

CURRENT MONTH OBLIGATION

Provision Type	Current Support	Arrears	Total Monthly Amount
Child Support	\$91.00	\$100.00	\$191.00
Medical Cash	\$50.00	\$0.00	\$50.00

PAYMENTS RECEIVED BETWEEN 01-01-1999 AND 06-08-2014

#	Distribution Date	Distribution Source	Distribution Amount	Order Eff Date	Applied to Provision	Disbursed To
32	04-08-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
33	03-26-2013	IW	\$15.85	02-05-2013	Child Support	CUSTODIAN
34	03-12-2013	IW	\$157.54	02-05-2013	Child Support	CUSTODIAN
35	02-26-2013	IW	\$157.54	07-15-2011	Child Support	CUSTODIAN
36	02-12-2013	IW	\$157.54	07-15-2011	Child Support	CUSTODIAN
37	01-29-2013	IW	\$157.54	07-15-2011	Child Support	CUSTODIAN
38	01-15-2013	IW	\$157.54	07-15-2011	Child Support	CUSTODIAN
39	01-02-2013	IW	\$157.54	07-15-2011	Child Support	CUSTODIAN
40	12-18-2012	IW	\$140.66	07-15-2011	Child Support	CUSTODIAN
41	08-23-2012	NP	\$308.00	07-15-2011	Child Support	CUSTODIAN
42	03-19-2012		\$1,162.00	07-15-2011	Child Support	CUSTODIAN
43	11-10-2011	NP	\$921.00	07-15-2011	Child Support	CUSTODIAN
Grand Total:			\$5,707.26			

DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 E. FLAMINGO RD SUITE 100
LAS VEGAS NV 89119



Exhibit “B”


B

Map & Directions

Map Only

Directions Only

Print

 **Green Valley Ranch Resort** greenvalleyranchresort.com/ A Beautiful Resort Away From The Las Vegas Strip. Book Direct & Save


Ad

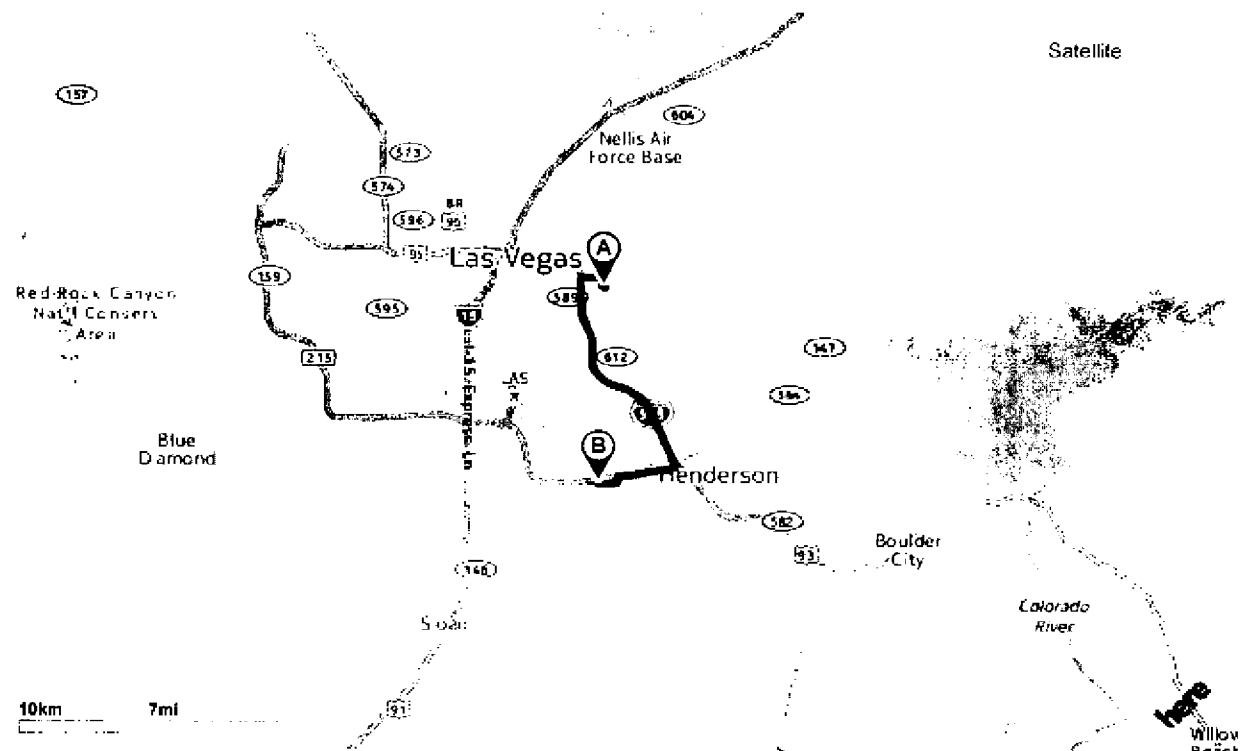
YAHOO!
MAPS

A 4650 Idaho Ave, Las Vegas, NV 89104-5910

B 2060 Desert Shadow Trl, Henderson, NV 89012-3272




Total Distance: 15.53 miles— Total Time: 20 mins

Map Layout 








A 4650 Idaho Ave, Las Vegas, NV 89104-5910

Expand All

- | | | |
|--|----------------|------|
| Head toward Arden Ave on Idaho Ave. | Go for 291 ft | Hide |
|  Turn right onto Arden Ave | Go for 0.4 mi | Hide |
|  Turn left onto E Charleston Blvd (NV-159 W). | Go for 1.0 mi | Hide |
|  Turn left and take ramp onto Las Vegas Expy (I-515 S). | Go for 10.1 mi | Hide |

(1)

	Take exit #61A/I-215 W onto Bruce Woodbury Belt (I-215 W).	Go for 2.4 mi	Hide
	Take exit #3B/Valle Verde Drive toward Valle Verde Dr South	Go for 0.4 mi	Hide
	Bear left onto S Valle Verde Dr.	Go for 0.3 mi	Hide
	Turn right onto Paseo Verde Pky.	Go for 0.3 mi	Hide
	Turn right onto Desert Shadow Trl.	Go for 0.6 mi	Hide
Your destination on Desert Shadow Trl is on the right. The trip takes 15.5 mi and 20 mins.			Hide



2060 Desert Shadow Trl, Henderson, NV 89012-3272

Expand All

When using any driving directions online it is a good idea to double check and make sure the road still exists, watch out for construction, and follow all traffic safety precautions. This is only to be used as an aid in planning.

Exhibit "B-1"

B-1

GENERAL AFFIDAVIT

Dated this 26th day of JUNE, 2014

BEING FIRST DULY SWORN, deposes and says: I/We, I Wesley Lewis in proper person AM Telling The Court That Maria Left The State Taking Isabella with her. There was No Abuse Like She is saying. She did not like the fact that we were living in the garage at my Mom & Dad's house. She was losing her 2 houses And I had mine selling on a short sale. She hated the fact that we were in the garage, although it was fixed up very nice. She called me And told me she was in California with Isabella And she wasn't coming back. If I wanted to see Isabella, I could come And get her. I Asked her to come home. Another day passed And she called And wanted me to come And get her And Isabella. That she was having car trouble? She had a new Ford, how could it be running bad? What she wanted was for me to go to Ventura CA. so that I would be arrested As she had lied to the police there. I would be in jail And she would be with her Mother & step dad. She came home after 3 mon days realizing I WAS NOT going after her. IN JAN. 2011 she LEFT for 4 months without telling anyone And Left Isabella with me. she came back to divorce me. IN WITNESS WHEREOF, I/We have hereunto set my hand/our hands this 26 day of JUNE, 2014

Signature of Affiant

Signature of Affiant

Print or Type name here

Print or Type name here

STATE OF _____)

COUNTY OF _____)

SWORN TO AND SUBSCRIBED to before me by _____
on this _____ day of _____, 20____

Notary Public

My commission expires: _____

Consult an attorney if you doubt this forms fitness for your purpose.

AFF100mk

Nevada Legal Forms & E-File, Inc. (702) 670-6977
3901 West Charleston Boulevard
Las Vegas, Nevada 89102
www.legalformsinc.com

(1)

© Consult an attorney if you doubt this forms Fitness for your purpose



OFFICE OF THE DISTRICT ATTORNEY
Bureau of Investigation
County of Ventura, State of California

GREGORY D. TOTTE
District Attorney

JAMES D. ELLISON
Chief Assistant District Attorney

ROBERT A. BRINER
Chief Investigator

GLEN A. KITZMANN
Deputy Chief Investigator

KENNETH A. VALENTINI
Deputy Chief Investigator

IMPORTANT FAX ALERT

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by telephone and return the original message to me at the address below via U.S. Postal Service. Thank you.

Date: 11-9-09

To: Mark Lewis

From: Erika Lorenzen, Investigative Assistant

Subject: Court Contracts and Penai Center Info.

Number of Pages (includes cover sheet) 6

Your Fax Number: 484-8244

My Fax Number: (805) 477-1655

Please notify me immediately if the referenced material is not received by calling me at (805) 477-1668

Please deliver this material to the named recipient as soon as possible.

Thank you,

646 County Square Drive, Suite 200, Ventura, CA 93003 www.ventura.org/vcda (805) 477-1693 FAX (805) 477-1655

(2)

DV-101

Description of Abuse

Case Number:

(4) This form is attached to DV-100, Item 21.

(1) Your name: MARIA DANIELA LEWIS(2) Name of person you want protection from (restrained person): Wesley Allen Lewis

(3) Describe the most recent abuse.

a. Date of most recent abuse: 11/9/09

b. Who was there?

Isabella (our daughter) his brother Sidney (was sleeping in the other room)

(c) What did the person in (b) do or say to you that made you afraid?

He told me that I was never going to be a somebody and that if I ever bother him he would take Isabella away from me. He strip my clothes w/ his bare hands and took his wedding ring off his finger and shoved it, pressing ~~against~~ my face really hard like making an indentation or mark & the ring in my face & throat. He also said that I was a bitch, a nobody. He placed both of his hands around my throat squeezing w/ strength along w/ choking. I bleed from his Vegas to protect my daughter and my self. He is unpredictable and violent no matter who is around.

d. Describe any use or threatened use of guns or other weapons.

none

e. Describe any injuries.

red mark from the ring and the clothes about he ripped off my bodyf. Did the police come? ☒ No ☐ YesIf yes, did they give you an Emergency Protective Order? ☐ Yes ☐ No ☐ I don't know

Attach a copy if you have one.

(3)

Maria

Taking a look at my human
dark side

a side that all human beings
have.

good side

yearning to love

bad side

yearning to fight
to be destructive

* book described that there
is a possibility that I might lack
the skill to develop a loving
relationship.

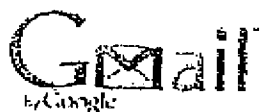
~~WP~~

(4)

Exhibit “B2”

Gmail - We are moving!!

Page 1 of 1



Maria Daniela Perdomo <perdomomda@gmail.com>

We are moving!!

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Wesley Allen Lewis 7023401221 <Info4WLewis@yahoo.com>

Mon, Nov 11, 2013 at 9:36 PM

Wesley,

Please be informed that my address will change effective on December 1, 2013, to the following address:

595 S. Green Valley Parkway

APT #923

Henderson, NV 89012

My telephone number remains the same: (702) 885-2853

Please update your records accordingly. Feel free to contact me for additional information. Btw, I'm happy to announce that Isabella will have her own private bedroom and bath.

Sincerely,

Maria Perdomo

(1)

the amount of alimony or child support to consider what a spouse or parent could in good faith earn if he so desired. *Rosenbaum v. Rosenbaum*, 86 Nev. 550, 471 P.2d 254, 1970 Nev. LEXIS 562 (1970).

Evidence supporting finding of unfitness.

The award of custody of two boys to their father, in whose custody they were during the pendency of the divorce action, on an express finding that the mother had committed adultery and neglected the children and was not the proper person to have custody of the minor children, was upheld. *Timney v. Timney*, 76 Nev. 230, 351 P.2d 611, 1960 Nev. LEXIS 99 (1960).

Amendment by the trial court of its original judgment so as to change custody of the minor children from mother to father, upon findings that mother had continued her relationship with an unmarried male, had allowed and encouraged this individual to remain in her home far into the evening and early morning hours, had continually engaged in illicit conduct in her home when the children were in close proximity to her bedroom, that the children were of a discerning age and aware that an unmarried man slept in the same bedroom with their mother at times, and that the school work of the children had deteriorated while they were in their mother's custody, would be affirmed. *Culbertson v. Culbertson*, 91 Nev. 230, 533 P.2d 768, 1975 Nev. LEXIS 594 (1975).

It is presumed that a trial court has properly exercised its judicial discretion in determining the best interests of the children. *Culbertson v. Culbertson*, 91 Nev. 230, 533 P.2d 768, 1975 Nev. LEXIS 594 (1975).

Powers granted by statute.

In modifying decrees of divorce with respect to child support, a court exercises the discretionary powers conferred upon it by statute. *Schmutzer v. Schmutzer*, 76 Nev. 123, 350 P.2d 142, 1960 Nev. LEXIS 89 (1960).

Determination based on personal knowledge of judge.

Statement of the trial judge that he had children and that he based his determination of child support on his knowledge of the cost of maintaining his children did not amount to error. *Fenkell v. Fenkell*, 86 Nev. 397, 469 P.2d 701, 1970 Nev. LEXIS 530 (1970).

Absence of basis to exercise discretion.

While, under this section, the court has discretion to act when the matter before it concerns children, their interests or welfare, there is nothing upon which discretion may properly operate when such subjects are in no way

involved; for a court to proceed to an exercise of discretion in the absence of a basis for such exercise is error. *Paine v. Paine*, 71 Nev. 262, 287 P.2d 716, 1955 Nev. LEXIS 88 (1955).

Judgment not disturbed unless discretion abused.

The trial court is vested with a large discretion in determining what is for a child's best welfare and unless such discretion is abused, the judgment will not be disturbed. *Timney v. Timney*, 76 Nev. 230, 351 P.2d 611, 1960 Nev. LEXIS 99 (1960); *Fenkell v. Fenkell*, 86 Nev. 397, 469 P.2d 701, 1970 Nev. LEXIS 530 (1970); *Noble v. Noble*, 86 Nev. 459, 470 P.2d 430, 1970 Nev. LEXIS 543 (1970); *Culbertson v. Culbertson*, 91 Nev. 230, 533 P.2d 768, 1975 Nev. LEXIS 594 (1975); *Gilbert v. Warren*, 95 Nev. 296, 594 P.2d 696, 1979 Nev. LEXIS 608 (1979), superseded by statute, NC-DSH, Inc. v. Garner, — Nev. —, 218 P.3d 853, 2009 Nev. LEXIS 55 (2009); *Patel v. Patel*, 96 Nev. 51, 604 P.2d 816, 1980 Nev. LEXIS 517 (1980).

Concern of the court on appeal of an order modifying a divorce decree with respect to child support is only whether the action of the court below constituted an abuse of discretion. *Schmutzer v. Schmutzer*, 76 Nev. 123, 350 P.2d 142, 1960 Nev. LEXIS 89 (1960).

Determination that custody should be changed made because mother did not obey a questionable court order, that the ten-year-old child should not be left alone for even 5 minutes, was an abuse of discretion. *Sims v. Sims*, 109 Nev. 1146, 865 P.2d 328, 1993 Nev. LEXIS 171 (1993).

Where divorced husband and father who sought a reduction in alimony and child support could have obtained his own relief by disposing of two of the three automobiles owned by himself and his new family, the trial court's refusal to modify his alimony and support payments was not an abuse of discretion. *Edwards v. Edwards*, 82 Nev. 392, 419 P.2d 637, 1966 Nev. LEXIS 251 (1966).

No changes in circumstances found.

Father's proposed grounds for finding a material change in circumstances, i.e., the mother's excessive yelling at the child, the mother's failure to facilitate a relationship between the father and the child, and the mother's lack of personal transportation, all existed at the time of the custodial order issued with the divorce decree and therefore did not constitute grounds for finding a material change in circumstances. *Hopper v. Hopper*, 113 Nev. 1138, 946 P.2d 171, 1997 Nev. LEXIS 128 (1997), overruled in part, *Castle v. Simmons*, 120 Nev. 98, 86 P.3d 1042, 2004 Nev. LEXIS 18 (2004).

-Special Provisions-

N.R.S. 125:570 (Evidence Supporting finding of unmarried)

The Award of custody of two boys to their father in whose custody they were during the pendency of the divorce action, on an express finding that the mother had committed adultery and neglected the children and was not the proper person to have custody of the minor children, was upheld Timney v. Timney, 76 Nev. 230 351 P.2d 611, 1960 Nev. Lexis 99 (1960)

Amendment by the Court of its original judgment so as to change custody of the minor children from the mother to father, upon findings that mother had continued her relationship with an unmarried man had allowed and encouraged this individual to remain in her home far into the evening and early morning hours. had continually engaged in illicit conduct in her home when the children were in close proximity to her bedroom, that the children were of a discerning age and aware that an unmarried man slept in the same bedroom with their mother at times and that the school work of the children had deteriorated while they were in their mother's custody, would be affirmed. Culbertson v. Culbertson 91 Nev. 230, 533 P.2d 768, 1975 NV Lexis 594 1975

IT is presumed that a Trial Court will properly (as in this case) exercise its Judicial discretion in determining the best interest of the child, with powers granted by statute and with direct, positive & substantive evidence to support the facts.

ॐ

ॐ नमो भगवते वासुदेवाय

ॐ नमो भगवते वासुदेवाय ॥ २॥

of Procedure AND The NEVADA Revised Statutes
outlined by The Court ORDER AS Stipulations
to be followed when granting The Decree of Divorce.

OBTAINING INFORMATION

The Plaintiff (Maria DANIELA Perdomo) Moved from the
Apartment She WAS Living in on EAST Sahara Ave
when the Court proceedings for Divorce were
Declared final. She refused to ANSWER calls from
the Defendant Wesley Lewis OR to CONTACT
him as to the Where they WERE AND with
Whom. Upon constant calling by Mr. Lewis
— She Eventually ANSWERED. They talked but
She refused to give him a Physical Custody
Address of Where They Lived.

FOR visitation days Maria Perdomo would
Meet The father Wesley Lewis in the parking
Lot of the Fashion Show Mall for Drop off
and Pick up. This went on for MONTHS —

FACTS < Physical Custody Provisions >

Without Concern for Isabella, She continued in defiance.

The Truth is Maria Perdomo had Set up residence
in The New High Rise Aria Hotel AND WAS
Living with Mr. Eric Sabat in a Million dollar Apt. A
ONE Bed Room Condo with TOTAL disregard
for the parental responsibilities for the Child's
Mental health By observing The Mothers Actions.
< Refer to N.R.S. 125:510 > Findings of UNFITNESS

225.144.12.12 29.12.2017 7.01.2018

(6)

Exhibit “B-3”

GENERAL AFFIDAVIT

Dated this 19 day of June, 20 14.

BEING FIRST DULY SWORN, deposes and says: I was busy doing a job when I received a call from my son Wesley telling me that his car was not starting and he had to get Isabella to school. That was about 8:00 AM. I was across town and I told him it would be at least an hour before I could get there. I carry my truck key & the Rav-4 key on the same chain. I arrived at home it was after 9:00 AM. He was concerned because it is such a long drive to school and it would be about 10:00 AM before he could get Isabella to school. I left him with the Rav-4 and took the truck. I told him, you better call Maria or she will have the cops over here. I wasn't wrong! Maria came over with the police meeting her at my house. I have lived at this same address for over 20 years and never had the police come to my house. Maria came in to our lives and the way we lived our personal lives changed. The police have been to my house at least 4-5 times in 3 years. My wife and I try to stay out of Maria and Wesley's co-parenting. They try, I know Wesley does.
IN WITNESS WHEREOF, I/we have hereunto set my hand/our hands this 26 day of June, 20 14.

Signature of Affiant

Signature of Affiant

Print or Type name here

Print or Type name here

STATE OF)

COUNTY OF)

SWORN TO AND SUBSCRIBED to before me by _____
on this _____ day of _____, 20____.

Notary Public

My commission expires: _____

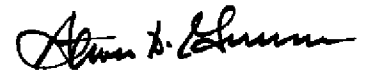
Consult an attorney if you doubt this form's fitness for your purpose.

AFF100mk

Nevada Legal Forms & Books, Inc. (702) 870-6977
5501 West Charleston Boulevard
Las Vegas, Nevada 89102

(1)

© Consult an attorney if you doubt this form's fitness for your purpose.



CLERK OF THE COURT

DECL
WESLEY ALLEN LEWIS
4650 Idaho Avenue
Las Vegas, NV 89104
In Proper Person

EIGHTH JUDICIAL DISTRICT COURT, FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA DANIELA PERDOMO)	
Plaintiff,)	Case No. D-10-427054-D
)	Dept. T
vs.)	
)	
WESLEY ALLEN LEWIS)	
Defendant,)	
)	

DECLARATION IN SUPPORT OF
ORDER TO EXTEND TIME TO ANSWER

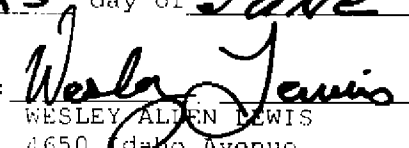
I, WESLEY ALLEN LEWIS the Defendant in this case, have been unable to file and serve an answer within 30 days after the service of the PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS TO DEFENDANT, PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS and PLAINTIFF'S FIRST SET OF INTERROGATORIES. (Please refer to Exhibits A, B, and C) as required by NRCp 12(a). I intend to defend this action and request an Order granting an extension of time to file the Answer.

Good cause exists as to why I have not filed an Answer, specifically since I am in the process of seeking legal representation and gathering information and evidence. I have every intention of answering these claims and I am asking this court to please grant me the extended time I am requesting to seek affordable legal counsel.

I request the Court sign an Order extending the time to answer or otherwise respond to September 30, 2014.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this 23rd day of June, 2014.

Submitted By: 
WESLEY ALLEN LEWIS
4650 Idaho Avenue
Las Vegas, NV 89104
In Proper Person

Handwritten text, likely bleed-through from the reverse side of the page. The text is illegible due to the quality of the scan.

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EXHIBIT A

1 ADMS
The Fine & Price Law Group
2 FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
3 Suite 5
8975 South Pecos Road
4 Henderson, Nevada 89074
Telephone: 702/384-8900
5 Facsimile: 702/384/6900
Email: fran@finepricelaw.com
6 Attorneys for Plaintiff
MARIA DANIELA LEWIS nka
7 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,)
MARIA DANIELA PERDOMO,)
11)
Plaintiff;) CASE NO: D-10-427054-D
12 v.) DEPT NO: T
13 WESLEY ALLEN LEWIS,)
DATE OF HEARING: n/a
14 Defendant.)
TIME OF HEARING: n/a
15)

16 Plaintiff's First Request For Admissions To Defendant

17 TO: WESLEY ALLEN LEWIS, Defendant:

18 COMES NOW Plaintiff, MARIA DANIELA PERDOMO, by and
19 through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price
20 Law Group, and hereby propounds the following requests for
21 admission upon Defendant, WESLEY ALLEN LEWIS, pursuant to Rule 36
22 of Nevada Rules of Civil Procedure, which must be answered under
23 oath and in writing within thirty (30) days of service herewith.

24 GENERAL INSTRUCTIONS

25 Pursuant to Rule 36 of the Nevada Rules of Civil
26 Procedure, any matter is deemed admitted unless written answer or
27 objection addressed to the matter signed by you is filed within
28 thirty (30) days after service of this request. If any objection

1 is made, the reasons therefore must be stated. The answer should
2 specifically deny any request not specifically admitted, or should
3 set forth in detail the reason why the answering party cannot
4 truthfully admit or deny any particular request.

5 A denial shall thoroughly meet the substance of the
6 request for admissions, and when good faith requires that a party
7 qualify its answer or deny only a part of the matter in which an
8 admission is requested, the party shall specify so much of it is
9 true and qualify or deny the remainder. The Plaintiff should not
10 give lack of information or knowledge as a reason for failure to
11 admit or deny unless they can state that a reasonable inquiry has
12 been made and that the information known or readily available and
13 obtainable to them is insufficient to enable them to admit or deny.

14 REQUEST FOR ADMISSION NO. 1: Admit that you work less
15 than forty hours per week at your place of employment.

16 REQUEST FOR ADMISSION NO. 2: Admit that you have not
17 since October 8, 2013 applied for full-time employment with any
18 entity.

19 REQUEST FOR ADMISSION NO. 3: Admit that you have not
20 made timely \$91.00 per month current child support payments to
21 Plaintiff commencing October 2013.

22 REQUEST FOR ADMISSION NO. 4: Admit that you have not
23 made timely \$100.00 per month child support arrears payments to
24 Plaintiff commencing October 2013.

25 REQUEST FOR ADMISSION NO. 5: Admit that you have not made
26 timely \$50.00 per month payments to Plaintiff as and for half of
27 your minor child's health insurance premiums commencing October
28 2013.

1 REQUEST FOR ADMISSION NO. 6: Admit that since October
2 2013 you have not made monthly payments directly to Kumon each and
3 every month as and for one-half of Isabella's tutoring costs.

4 REQUEST FOR ADMISSION NO. 7: Admit that you have made no
5 payments to Plaintiff in partial satisfaction of the \$5,500.00
6 contempt judgment rendered by the Court.

7 REQUEST FOR ADMISSION NO. 8: Admit that you have made no
8 payments to Plaintiff in partial satisfaction of the \$15,000.00
9 attorney fees judgment rendered by the Court.

10 REQUEST FOR ADMISSION NO. 9: Admit that Isabella is
11 consistently not completing her nightly homework assignments while
12 in your care.

13 REQUEST FOR ADMISSION NO. 10: Admit that Isabella
14 experienced a drop in her grades between the first and second
15 trimester of the 2013-2014 school year, including an entire letter
16 grade drop in "writing".

17 REQUEST FOR ADMISSION NO. 11: Admit that Isabella's
18 school absences more than doubled between the first and second
19 trimester of the 2013-2014 academic year.

20 REQUEST FOR ADMISSION NO. 12: Admit that despite
21 receiving detailed instructions on how to treat Isabella's Eczema,
22 you did not fully follow the instructions.

23 REQUEST FOR ADMISSION NO. 13: Admit that on January 29,
24 2014, you did not take Isabella to see a doctor for flu symptoms
25 that turned out be strep throat.

26 REQUEST FOR ADMISSION NO. 14: Admit that Warren Wheatly,
27 a licensed counselor, has diagnosed Isabella with generalized
28 anxiety disorder.

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EXHIBIT B

1 REQT
The Fine & Price Law Group
2 FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
3 Suite 5
8975 South Pecos Road
4 Henderson, Nevada 89074
Telephone: 702/384-8900
5 Facsimile: 702/384/6900
Email: fran@finepricelaw.com
6 Attorneys for Plaintiff
MARIA DANIELA LEWIS nka
7 MARIA DANIELA PERDOMO

8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,)
MARIA DANIELA PERDOMO,)
11)
Plaintiff;) CASE NO: D-10-427054-D
12 v.) DEPT NO: T
13 WESLEY ALLEN LEWIS,)
14 Defendant.) DATE OF HEARING: n/a
TIME OF HEARING: n/a
15)

16 Plaintiff's Request For Production Of Documents

17 TO: WESLEY ALLEN LEWIS, Defendant in Proper Person:

18 Under authority of Rule 34, Nevada Rules Of Civil
19 Procedure, Plaintiff, MARIA DANIELA PERDOMO, by and through her
20 attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price Law Group,
21 does hereby request that Defendant produce within thirty days at
22 The Fine Law Group, 8975 South Pecos Road, Suite 5, Henderson,
23 Nevada 89074 the following documents:

24 REQUEST NO. 1: Copies of any and all documents showing
25 your income and earnings from all sources, to include copies of any
26 and all Federal Income Tax Returns, W-2 statements, 1099 forms,
27 and/or pay stubs received by you from any employer for which you
28 are, or were, employed, for the period beginning January 1, 2013

1 forward.

2 **REQUEST NO. 2:** Copies of any and all documents evidencing
3 payments you have made since October 8, 2013 as and for current
4 child support, child support arrears, your contribution towards
5 Isabella's health insurance premium, and Kumon tutoring visits.

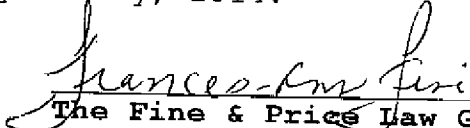
6 **REQUEST NO. 3:** Copies of any and all documentation
7 evidencing expenditures you have made from January 1, 2013 forward
8 for the benefit of Isabella, including but not limited to school-
9 related expenses, tutoring, clothes, medical bills, counseling
10 bills.

11 **REQUEST NO. 4:** For the period from January 1, 2013
12 forward, copies of all monthly, semi-monthly, annual or any other
13 periodic account statements for any accounts in financial
14 institutions in which you have, or have had, an interest, or made
15 deposits or withdrawals from, including but not limited to,
16 checking accounts, savings accounts, stocks, mutual funds, IRA's,
17 401(k)s, pensions, profit sharing and retirement accounts.

18 **REQUEST NO. 5:** An updated Financial Disclosure Form.

19 **REQUEST NO. 6:** Copies of any and all documents which you
20 intend to offer as proposed exhibits at the hearing scheduled in
21 this matter.

22
23 DATED this 28 day of May, 2014.

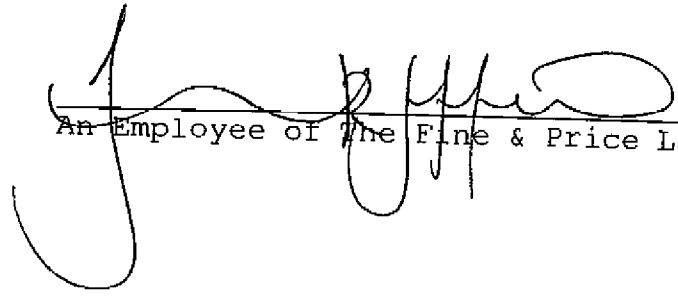
24
25 
26 The Fine & Price Law Group
27 FRANCES-ANN FINE, ESQ.
28 Nevada Bar No. 0025
 Attorney for Plaintiff
 MARIA DANIELLA PERDOMO

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CERTIFICATE OF MAILING

On this 20th day of May, 2014, a copy of the foregoing
Plaintiff's Request for Production of Documents was served by
placing a copy of same into the United States Mail, first class
postage prepaid at Henderson, Nevada addressed to the following:

Wesley Allen Lewis
4650 Idaho Avenue
Las Vegas, Nevada 89104


An Employee of The Fine & Price Law Group

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EXHIBIT C

1 INT
2 The Fine & Price Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 Suite 5
6 8975 South Pecos Road
7 Henderson, Nevada 89074
8 Telephone: 702/384-8900
9 Facsimile: 702/384/6900
10 Email: fran@finepricelaw.com
11 Attorneys for Plaintiff
12 MARIA DANIELA LEWIS nka
13 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,)
11 MARIA DANIELA PERDOMO,)
12)
13 Plaintiff;) CASE NO: D-10-427054-D
14 v.) DEPT NO: T
15)
16 WESLEY ALLEN LEWIS,) DATE OF HEARING: n/a
17) TIME OF HEARING: n/a
18 Defendant.)
19)

20 Plaintiff's First Set Of Interrogatories

21 TO: WESLEY ALLEN LEWIS, Defendant in Proper Person:

22 Under authority of Rule 33, Nevada Rules Of Civil
23 Procedure, Plaintiff, MARIA DANIELA LEWIS, by and through her
24 attorney, FRANCES-ANN FINE, ESQUIRE, of The Fine & Price Law Group,
25 hereby requests that Defendant answer in writing and under oath
26 within thirty (30) days the following Interrogatories.

27 NOTE: When used in these Interrogatories, the term
28 "DEFENDANT", its plural or any synonym thereof, is intended to and
shall embrace and include in addition to the named party or
parties, counsel for said party, and all agents, servants,
employees, representatives, investigators and others who are in
possession of or may have obtained information for or on behalf of

1 the named party or parties. As to each person named in response to
2 each question herein, state the person's full name, last known
3 address, telephone number, job title, and capacity or position at
4 last known employment.

5 In answering these Interrogatories, Defendant is
6 requested to furnish all information available to her at the time
7 the answers are made, including information in the possession of
8 her current or former agents, accountants, attorneys or
9 investigators for her attorneys, not merely information known of
10 the personal knowledge of her officers, directors, agents and
11 employees. If a claim of privilege is made as to any information
12 or documents sought by these Interrogatories, you must specify the
13 basis for privilege and describe the information or documents
14 claimed to be privileged.

15 **PRELIMINARY EXPLANATIONS AND DEFINITIONS**

16 The following definitions are applicable throughout the
17 Interrogatories which follows:

18 "Facts" means all circumstances, events and evidence
19 pertaining to or touching upon the item in question.

20 "You" refers to the party or parties to whom these
21 Interrogatories are directed.

22 "Witnesses" means the name, address and telephone number
23 of each person having knowledge of or pertaining to the item in
24 question.

25 "Writing" includes, but is not limited to, any record,
26 minutes of meetings, agreement, contract, memorandum, map, diagram,
27 illustration, photograph, telegram, written analysis, report,
28 recording, transcription, and memoranda made of any telephone

1 communication or face-to-face oral meeting or conversation, written
2 communication (which includes, but is not limited to, any letter,
3 inter-office communication and telegram), paper, book or other
4 document. It includes the original, any copy and any drafts
5 thereof.

6 "Statement" includes each recordation of any interview or
7 conversation with a witness, whether by a signed or unsigned
8 writing, recording, court reported statement or otherwise.

9 "Document" includes written reports, letters, books,
10 telegrams, memoranda, drawings, notes, tape recordings,
11 photographs, or any other written or graphic material communication
12 however denominated.

13 "Person" includes natural persons, partnerships,
14 consortiums, joint ventures, and every other form of legally
15 recognized entity, including corporations.

16 "Identify", when used in reference to an individual
17 person, means to:

- 18 1. State his full name;
- 19 2. State his present or last-known address;
- 20 3. State his present or last-known position and
21 business affiliation; and
- 22 4. Describe his relationship to you.

23 "Identify", when used in reference to a corporation,
24 partnership, or entity, means to:

- 25 1. State its full name;
- 26 2. State its present or last-known address;
- 27 3. In the case of a corporation, set forth the state
28 of its incorporation; and

- 1 4. Describe your relationship to it, if any.
- 2 "Identify", when used in reference to a document or
- 3 writing, means to:
- 4 (a) State the date of preparation, author, title (if
- 5 any), subject matter, number of pages, and type of
- 6 document (e.g., contract, letter, reports, etc.) or
- 7 some other means of distinguishing the document or
- 8 writing;
- 9 (b) Identify each and every person who prepared or
- 10 participated in the preparation of the document or
- 11 writing;
- 12 (c) Identify each and every person who received a copy
- 13 of the document;
- 14 (d) State the present location of the document or
- 15 writing;
- 16 (e) Identify each and every person having custody or
- 17 control of the document or writing;
- 18 (f) State whether any copy of the document or writing
- 19 is not identical to the original by reason of
- 20 shorthand or other written notes, initials, or any
- 21 other modifications;
- 22 (g) State, if the document or writing has been
- 23 destroyed, the circumstances surrounding and the
- 24 reason for the destruction;
- 25 (h) Identify, if the document or writing has been
- 26 destroyed, each and every person who destroyed, or
- 27 participated in, or ordered or suggested the
- 28 destruction of it.

1 "Identify", when used in reference to an oral
2 communication other than a meeting, means to:

3 (a) State the date and place of the oral communication
4 or some other means of identifying the oral
5 communication;

6 (b) State the medium through which the oral
7 communication was made (e.g. in person, by
8 telephone, etc.);

9 © Identify each and every person who participated in
10 the oral communication;

11 (d) Identify each and every person (other than a
12 participant) hearing the oral communication;

13 (e) State the substance of the oral communication,
14 including the substance of the discussion (who said
15 what to whom and the order in which it was said)
16 and the decisions reached in the course of or as a
17 result of the oral communication;

18 (f) Identify each and every document concerning what
19 was said in the oral communication.

20 If you cannot answer any of the following Interrogatories
21 in full and complete detail, after exercising due diligence to
22 secure the information to do so, so state, and answer to the extent
23 possible, specifying your inability to answer the remainder, and
24 stating whatever information or knowledge you have concerning the
25 unanswered portion.

26 These Interrogatories shall be deemed continuing so as to
27 require supplemental answers if you or your attorneys obtain
28 further information between the time answers are served and the

1 time of hearing.

2 INTERROGATORY NO. 1: Please state your full name,
3 your date of birth and your social security number.

4 INTERROGATORY NO. 2: State the name and address of
5 each employer you have had since January 2013 and further list your
6 job title at each place of employment, state your weekly work
7 schedule and provide a detailed description of your job duties.

8 INTERROGATORY NO. 3: State the gross monthly income
9 you have received from each employer listed in response to
10 Interrogatory 2.

11 INTERROGATORY NO. 4: Identify any and all sources of
12 income other than those disclosed in response to Interrogatories 2
13 and 3, including but not limited to: settlements or judgments
14 received from legal actions, gifts from friends, relatives and/or
15 significant others, rental income, gambling winnings, benefits and
16 allowances received from employers, investment income, dividends
17 and disbursements. For any such income received since January
18 2013, please identify:

- 19 1) The source of the income;
20 2) The date of receipt;
21 3) The dollar amount received; and
22 4) The financial institution or other initial place of
23 deposit of the income.

24 INTERROGATORY NO. 5: Please identify all monetary
25 accounts in all financial institutions in which you have or have
26 had an interest (whether or not your name is on the account), in
27 which you have made a deposit, or from which you have made a
28 withdrawal from January 2013 forward, including but not limited to,

1 checking, savings, certificates of deposit and IRA accounts, as
2 well as any monetary accounts of any business entity in which you
3 have or have had an ownership interest. Such identification shall
4 include the name of each such financial institution and account
5 number associated therewith.

6 **INTERROGATORY NO. 6:** From January 2013 to the
7 present, please describe any and all efforts that you have made to
8 obtain full-time employment, or to otherwise supplement your income
9 and identify all entities to which you have submitted a resume or
10 application for employment, or otherwise sought employment from.

11 **INTERROGATORY NO. 7:** For each potential employer from
12 which you have sought employment, or to which you have submitted a
13 resume, please provide the following information:

- 14 1. Company name;
- 15 2. Date of interview;
- 16 3. Salary or Compensation sought;
- 17 4. Nature of employment sought;
- 18 5. Address of company;
- 19 6. Company telephone number;
- 20 7. Address of work location; and
- 21 8. Contact or interviewer's name.

22 **INTERROGATORY NO. 8:** If you claim to have a
23 disability or medical condition which impacts your ability to work,
24 state in detail the impact of the condition on your earning
25 capacity, any and all work related limitations of your condition,
26 what efforts you have made to secure alternative employment which
27 would not be limited by your condition, whether you have been
28 officially deemed "disabled" pursuant to any administrative or

1 governmental authority, and whether you have ever applied for
2 disability benefits due to the condition.

3 INTERROGATORY NO. 9: Please explain why you and
4 Isabella are sharing a bedroom, despite the availability of two
5 other bedrooms in your home.

6 INTERROGATORY NO. 10: Please explain why Isabella's
7 homework log is not consistently being completed while she in your
8 care.

9 INTERROGATORY NO. 11: Please explain why Isabella's
10 cellular telephone is consistently uncharged and therefore not
11 operational while she is in your care.

12 INTERROGATORY NO. 12: Please explain why you did not
13 take Isabella to see a doctor on or around January 29, 2014, when
14 she exhibited flu symptoms that resulted in strep throat.

15 INTERROGATORY NO. 13: Please explain why you
16 continue to sleep with a large fan operating in your joint bedroom
17 with Isabella.

18 INTERROGATORY NO. 14: Please state the year, make, and
19 model of any and all vehicles that you currently drive and/or own.
20 For every vehicle that you drive and/or own, please state how the
21 vehicle was purchases, the name of any co-signer, if any, the
22 purchase price of the vehicle, and if any down payments were made,
23 where did the funds for same come from?

24 INTERROGATORY NO. 15: If it is your contention that
25 Maria should not be awarded primary physical custody of Isabella,
26 please provide a detailed explanation of your reasoning.

27 INTERROGATORY NO. 16: For the period from October 8,
28 2013 forward, state the date and amount of each current child

1 support payment you have made to Plaintiff.

2 INTERROGATORY NO. 17: For the period from October 8,
3 2013 forward, state the date and amount of each child support
4 arrears payment you have made to Plaintiff.

5 INTERROGATORY NO. 18: For the period from October 8,
6 2013 forward, state the date and amount of each payment to
7 Plaintiff as and for your half of Isabella's health insurance
8 premium.

9 INTERROGATORY NO. 19: For the period from October 8,
10 2013 forward, state the date and amount of each payment to Kuman
11 Tutoring as and for Isabella's tutoring.

12 INTERROGATORY NO. 20: Identify each and every document
13 used, consulted or relied upon in the preparation of your answers
14 to these Interrogatories.

15 INTERROGATORY NO. 21: Please state the name, address,
16 and telephone number of each and every person who has knowledge of
17 discoverable matters and of facts to support any and all
18 allegations in your papers and pleadings filed in this case.

19 INTERROGATORY NO. 22: State the names, addresses, and
20 telephone numbers of each and every witness you plan on calling on
21 your behalf at the hearing in this matter, as well as the subject
22 matter of each witness' testimony.

23 / / /

24 / / /

25 / / /

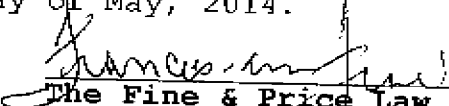
26 / / /

27 / / /

28 / / /

1 INTERROGATORY NO. 23: Identify by name and description
2 all documents which you plan to offer as proposed exhibits at the
3 hearing on this matter.

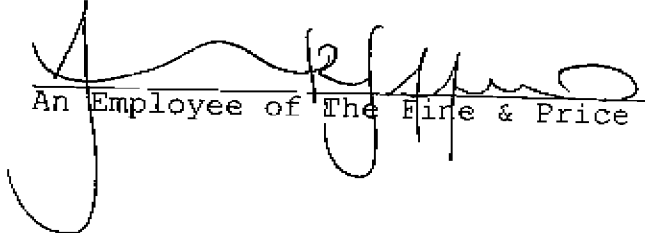
4 DATED this 26 day of May, 2014.

5 
6 The Fine & Price Law Group
7 FRANCES-ANN FINE, ESQUIRE
8 Nevada Bar No. 0025
9 Attorney for Plaintiff
10 MARIA DANIELA PERDOMO

10 CERTIFICATE OF MAILING

11 I hereby certify that on the 26th day of May, 2014,
12 service of the foregoing Plaintiff's First Set Of Interrogatories
13 was made by placing a copy of same into the United States Mail,
14 first class postage prepaid, at Las Vegas, Nevada, addressed to the
15 following:

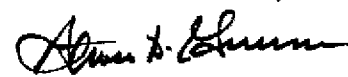
16 Wesley Allen Lewis
17 4650 Idaho Avenue
18 Las Vegas, Nevada 89104

19 
20 An Employee of The Fine & Price Law Group

MISC

Name: Frances-Ann Fine, Esquire
Address: 8975 S. Peccs Rd. Ste 5
Henderson, Nevada 89104
Phone: 702/364-8900
Email: fran@fineprice-law.com
Attorney for Plaintiff
Nevada State Bar No. 6025

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CLERK OF THE COURT

Eighth Judicial District Court
Clark County, Nevada

<u>Maria Daniela Pordano</u> Plaintiff,	Case No. <u>D-10-427054-D</u>
vs.	Dept. <u>T</u>
<u>Wesley Allen Lewis</u> Defendant.	

GENERAL FINANCIAL DISCLOSURE FORM

A. Personal Information:

1. What is your full name? (first, middle, last) Maria Daniela Pordano
2. How old are you? 35
3. What is your date of birth? 10-5-1979
4. What is your highest level of education? Bachelor's Degree

B. Employment Information:

1. Are you currently employed/ self-employed? (☒ check one)

☐ No

☒ Yes If yes, complete the table below. Attached an additional page if needed.

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
11-1-2011	University of NV - Reno			

2. Are you disabled? (☒ check one)

☒ No

☐ Yes

If yes, what is your level of disability? _____
What agency certified you disabled? _____
What is the nature of your disability? _____

C. Prior Employment: If you are unemployed or have been working at your current job for less than 2 years, complete the following information.

Prior Employer: _____ Date of Hire: _____ Date of Termination: _____
Reason for Leaving: _____

Monthly Personal Income Schedule

A. Year-to-date Income.

As of the pay period ending 10-30-2014 my gross year to date pay is \$ 12,701.58.

B. Determine your Gross Monthly Income.

Hourly Wage

	×		=		×	52 Weeks	=		÷	12 Months	=	
Hourly Wage		Number of hours worked per week		Weekly Income				Annual Income				Gross Monthly Income

Annual Salary

<u>23,701.58</u> Annual Income	÷	12 Months	=	<u>1,981.04</u> Gross Monthly Income
-----------------------------------	---	--------------	---	---

C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income			
Bonuses			
Car, Housing, or Other allowance:			
Commissions or Tips:			
Net Rental Income:			
Overtime Pay			
Pension/Retirement:			
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support			
Workman's Compensation			
Other: <u>Bilingual</u>	<u>every 2 weeks</u>	<u>\$47.18</u>	<u>\$566.16</u>
Total Other Income Received			

D. Monthly Deductions

	Type of Deduction	Amount
1.	Court Ordered Child Support	
2.	Federal Health Savings Plan	
3.	Federal Income Tax	5.00
4.	Health Insurance	113.23 avg.
5.	Life, Disability, or Other Insurance Premiums	
6.	Medicare	29.05 avg.
7.	Other: (Type of Deduction)	
8.	Retirement, Pension, IRA, or 401(k)	287.00 avg.
9.	Savings	
10.	Social Security	
11.	Union Dues	
Total Monthly Deductions (Lines 1-11)		

Business/Self-Employment Income & Expense Schedule

A. Business Income:

What is your average gross monthly income/revenue from self-employment or businesses? \$ _____

B. Business Expenses: Attach an additional page if needed.

Type of Business Expense	Frequency	Amount	12 Month Average
Advertising			
Car and truck used for business			
Commissions, wages or fees			
Business Entertainment/Travel			
Insurance			
Legal and professional			
Mortgage or Rent			
Other: (type of expense)			
Pension and profit-sharing plans			
Repairs and maintenance			
Supplies			
Taxes and licenses			
Utilities			

Personal Expense Schedule (Monthly)

- A. Fill in the table with the amount of money you spend each month on the following expenses and check whether you pay the expense for you, for the other party, or for both of you.

Expense	Monthly Amount I Pay	For Me <input type="checkbox"/>	Other Party <input type="checkbox"/>	For Both <input type="checkbox"/>
Alimony Spousal Support				
Auto Insurance				
Car Loan/Lease Payment				
Cell Phone	120. ⁰⁰			
Child Support				
Clothing, Shoes, Etc...	100. ⁰⁰			
Credit Card Payments				
Dry Cleaning				
Electric	100. ⁰⁰			
Food (groceries & restaurants)	200. ⁰⁰			
Fuel	150. ⁰⁰			
Gas	30. ⁰⁰			
Health Insurance				
HOA				
Home Insurance				
Home Phone				
Internet/Cable	100. ⁰⁰			
Lawn Care				
Membership Fees				
Mortgage/Rent/Lease	995. ⁰⁰			
Other:				
Pest Control				
Pets	30. ⁰⁰			
Pool Service				
Property Taxes				
Security				
Sewer				
Student Loans	120. ⁰⁰			
Unreimbursed Medical Expense				
Water				
Total Monthly Expenses	2,505. ⁰⁰			

Personal Expense Schedule
Household Information

- A. Fill in the table below with the name and date of birth of each child, the person the child is living with, and whether the child is from this relationship. Attached a separate sheet if needed.

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 st	Isabella Lewis	8-10-2000	Both	Yes	No
2 nd					
3 rd					
4 th					

- B. Fill in the table below with the amount of money you spend each month on the following expenses for each child.

Type of Expense	1 st Child	2 nd Child	3 rd Child	4 th Child
Child Care				
Clothing	100.00			
Education	200.00			
Entertainment	40.00			
Summer Camp/Programs	40.00			
Transportation Costs for Visitation	20.00			
Unreimbursed Medical Expenses				
Telephone	37.00			
Total Monthly Expenses				

- C. Fill in the table below with the names, ages, and the amount of money contributed by all persons living in the home over the age of eighteen. If more than 4 adult household members attached a separate sheet.

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc...)	Monthly Contribution
Juan Fierle		husband	850.00

Personal Asset and Debt Chart

A. Complete this chart by listing all of your assets, the value of each, the amount owed on each, and whose name the asset or debt is under. If more than 15 assets, attach a separate sheet.

Line #	Description of Asset and Debt Thereon	Gross Value		Total Amount Owed		Net Value	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.		\$	-	\$	=	\$	
2.		\$	-	\$	=	\$	
3.		\$	-	\$	=	\$	
4.		\$	-	\$	=	\$	
5.		\$	-	\$	=	\$	
6.		\$	-	\$	=	\$	
7.		\$	-	\$	=	\$	
8.		\$	-	\$	=	\$	
9.		\$	-	\$	=	\$	
10.		\$	-	\$	=	\$	
11.		\$	-	\$	=	\$	
12.		\$	-	\$	=	\$	
13.		\$	-	\$	=	\$	
14.		\$	-	\$	=	\$	
15.		\$	-	\$	=	\$	
Total Value of Assets (add lines 1-15)		\$	-	\$	=	\$	

B. Complete this chart by listing all of your unsecured debt, the amount owed on each account, and whose name the debt is under. If more than 5 unsecured debts, attach a separate sheet.

Line #	Description of Credit Card or Other Unsecured Debt	Total Amount owed	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.		\$	
2.		\$	
3.		\$	
4.		\$	
Total Unsecured Debt (add lines 1-5)		\$	

CERTIFICATION

Attorney Information: Complete the following sentences:

1. I (have/have not) have retained an attorney for this case.
2. As of the date of today, the attorney has been paid a total of \$ 19,200.00 on my behalf.
3. I have a credit with my attorney in the amount of \$ 0.
4. I currently owe my attorney a total of \$ 10,977.91.
5. I owe my prior attorney a total of \$ 0.

IMPORTANT: Read the following paragraphs carefully and initial each one.

MP I swear or affirm under penalty of perjury that I have read and followed all instructions in completing this Financial Disclosure Form. I understand that, by my signature, I guarantee the truthfulness of the information on this Form. I also understand that if I knowingly make false statements I may be subject to punishment, including contempt of court.

MP I have attached a copy of my 3 most recent pay stubs to this form.

[Signature]
Signature

07/22/14
Date

CERTIFICATE OF SERVICE

I hereby declare under the penalty of perjury of the State of Nevada that the following is true and correct:

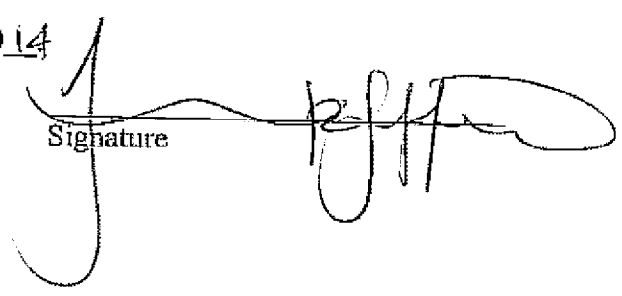
That on (date) July 22, 2014, service of the General Financial Disclosure Form was made to the following interested parties in the following manner:

☒ Via 1st Class U.S. Mail, postage fully prepaid addressed as follows:

Wesley Allan Lewis, 4050 Idaho Avenue, Las Vegas, Nevada 89104

☐ Via Facsimile and/or Email Pursuant to the Consent of Service by Electronic Means on file herein to: _____

Executed on the 22nd day of July, 2014

Signature 



UNIVERSITY OF NEVADA, RENO
PAYROLL DEPARTMENT
RENO, NV
89557
PHONE NUMBER: 775 784 6553

STATEMENT OF EARNINGS

FOR: PERDOMO, MARIA DANIELA

006161768

Pay Period End Date: 06/30/14
Pay Date: 07/10/14

ADVICE NUMBER
A167401

EMPLOYEE ADDRESS 595 SOUTH GREEN VALLEY PARKWAY UNIT 923 RENDERSON, NV 89012		DIRECT DEPOSIT Institution J.P. MORGAN CHASE		Account Number *****3026	Amount 745.01	TAX DATA Filing Status: S Allowances: 5 Additional Info:		
TOTAL GROSS		FEDERAL TAXABLE GROSS		TOTAL TAXES		TOTAL DEDUCTIONS		
CURRENT: 990.78		889.17		12.89		332.80		
YTD TO DATE: 12701.58		12022.19		207.11		3401.82		
						\$ 745.01		
HOURS AND EARNINGS				EMPLOYEE TAXES				
Description	Rate	Hours	Current Earnings	Description	Current	Year to Date		
REG PAY			943.52	MEDICARE	12.89	174.32		
BILINGUAL			47.18	FEDERAL TAX		32.99		
TOTAL:				TOTAL:				
990.78				12.89 207.11				
FEDERAL WITHHOLDING PRE-TAX DEDUCTIONS			STANDARD DEDUCTIONS			EMPLOYER RETIREMENT CONTRIBUTION		
Description	Current	Year to Date	Description	Current	Year to Date	Description	Current	Year to Date
HEALTH INS PRN	101.53	679.39	PERS 1 PRN	131.27	1722.42	PERS 1 PRN	131.27	1722.42
TOTAL:			TOTAL:			TOTAL:		
101.53 679.39			131.27 1722.42			131.27 1722.42		



UNIVERSITY OF NEVADA, RENO
PAYROLL DEPARTMENT
RENO, NV
89557
PHONE NUMBER: 775 784 8693

STATEMENT OF EARNINGS

FOR: PERDOMO, MARIA DANIELA

000161768

EMPLOYEE ADDRESS 595 SOUTH GREEN VALLEY PARKWAY UNIT 523 HENDERSON, NV 89012		Pay Period End Date: 06/15/14 Pay Date: 06/25/14		ADVICE NUMBER A159770	
		DIRECT DEPOSIT Institution: J.P. MORGAN CHASE Account Number: *****3026 Amount: 730.28		TAX DATA Filing Status: S Allowances: 5 Additional: 0	
TOTAL GROSS Current: 822.38 Year to Date: 11710.88		FEDERAL TAXABLE GROSS Current: 874.23 Year to Date: 11133.02		TOTAL TAXES Current: 12.68 Year to Date: 194.43	
TOTAL DEDUCTIONS Current: 179.43 Year to Date: 2163.01		NET PAY \$ 730.28			
HOURS AND EARNINGS			EMPLOYEE TAXES		
Description	Rate	Hours	Current Earnings	Description	Current
REG PAY			943.52	MEDICARE	12.68
CLA FUR	14.46	4.50	65.07	FEDERAL TAX	32.99
CLA 5\$ FUR	.72	4.50	3.25		
BILINGUAL			47.12		
TOTAL:			9.00	522.38	12.68
FEDERAL WITHHOLDING PRE-TAX DEDUCTIONS			STANDARD DEDUCTIONS		EMPLOYER RETIREMENT CONTRIBUTION
Description	Current	Year to Date	Description	Current	Year to Date
HEALTH INS PRE	46.15	577.86	PERS 1 ERS	131.27	1591.15
TOTAL:			46.15	577.86	131.27
			131.27	1591.15	131.27
			131.27	1591.15	1591.15



UNIVERSITY OF NEVADA, RENO
PAYROLL DEPARTMENT
RENO, NV
89557
PHONE NUMBER: 775 784 6653

STATEMENT OF EARNINGS

FOR: PERDOMO, MARIA DANIELA

000161768

EMPLOYEE ADDRESS 595 SOUTH GREEN VALLEY PARKWAY UNIT 923 HENDERSON, NV 89012		PAY PERIOD Pay Period End Date: 05/31/14 Pay Date: 05/30/14		ADVICE NUMBER A156490	
		DIRECT DEPOSIT Institution: J.P. MORGAN CHASE Account Number: *****3026 Amount: 885.43		TAX DATA Filing Status: S Allowances: 5 Additional Tax:	
TOTAL GROSS Current: 1110.78 Year to Date: 10786.50		FEDERAL TAXABLE GROSS Current: 1063.62 Year to Date: 10786.79		TOTAL TAXES Current: 30.01 Year to Date: 181.74	
TOTAL DEDUCTIONS Current: 195.34 Year to Date: 1989.89		NET PAY Current: \$ 885.43 Year to Date:			
HOURS AND EARNINGS				EMPLOYEE TAXES	
Description	Rate	Hours	Current Earnings	Description	Current
REG PAY	15.01	8.00	120.08	MEDICARE	15.41
REG PAY			343.52	FEDERAL TAX	14.60
BILINGUAL			47.15		
TOTAL:			8.00	TOTAL:	
			1110.78		
FEDERAL WITHHOLDING PRE-TAX DEDUCTIONS			STANDARD DEDUCTIONS		EMPLOYER RETIREMENT CONTRIBUTION
Description	Current	Year to Date	Description	Current	Year to Date
HEALTH INS PRE	46.16	529.71	PERS 1 BES	147.18	1459.88
TOTAL:			46.16	TOTAL:	
			529.71		
			147.18		
			1459.88		
			147.18		
			1459.88		



UNIVERSITY OF NEVADA, RENO
PAYROLL DEPARTMENT
RENO, NV
89557
PHONE NUMBER: 775 784 6653

STATEMENT OF EARNINGS

FOR: PERDOMO, MARIA DANIELA

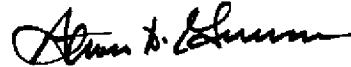
080161768

EMPLOYEE ADDRESS 505 SOUTH GREEN VALLEY PARKWAY UNIT 923 HENDERSON, NV 89012		Pay Period End Date: 05/15/14 Pay Date: 05/23/14		ADVICE NUMBER A147170	
		DIRECT DEPOSIT Institution: J.P. MORGAN CHASE Account Number: *****1026 Amount: 795.03		TAX DATA Filing status: 5 Allowances: 5 Additional tax:	
TOTAL GROSS Current: 990.70 Year to Date: 9677.72		FEDERAL TAXABLE GROSS Current: 942.55 Year to Date: 9196.17		TOTAL TAXES Current: 16.25 Year to Date: 151.73	
TOTAL DEDUCTIONS Current: 179.42 Year to Date: 1794.25		NET PAY Current: \$ 795.03			
HOURS AND EARNINGS				EMPLOYEE TAXES	
Description	Rate	Hours	Current Earnings	Description	Current
REG PAY			943.52	MEDICARE	13.66
BILINGUAL			47.18	FEDERAL TAX	2.59
TOTAL:			990.70	TOTAL: 16.25	
FEDERAL WITHHOLDING PRE-TAX DEDUCTIONS			STANDARD DEDUCTIONS		EMPLOYER RETIREMENT CONTRIBUTION
Description	Current	Year to Date	Description	Current	Year to Date
HEALTH INS PRE	48.15	481.55	PERS 1 EEE	131.27	1312.70
TOTAL: 48.15 481.55			TOTAL: 131.27 1312.70		TOTAL: 131.27 1312.70

1 AFFT

2 Wesley Allen Lewis
3 4650 Idaho Av.
4 LAS Vegas NV 89104
5 702-432-3996
IN PROPER PERSON

DISTRICT COURT



CLERK OF THE COURT

6 Ana Maria Daniela Schima CLARK COUNTY, NEVADA

7 Ana Maria Daniela Lewis

8 Ana Maria Daniela Perdomo

9 Ana Maria Daniela Fuentes

Plaintiff(s).

11 -vs-

CASE NO. D-10-427054-D

DEPT. NO. T

12 Wesley Allen Lewis

Defendant(s).

14 IN PROPER PERSON

16 AFFIDAVIT IN SUPPORT OF ORDER EXTENDING TIME TO ANSWER

17 STATE OF Nevada)

18)
19 COUNTY OF CLARK)

ss:

20 ☒ Defendant(s) ☐ Counsel for Defendant(s), being duly sworn, states that

21 Defendant(s) _____ has been unable to serve and file an Answer within 20 days after
22 the service of the Summons and Complaint on Defendant(s) as required by NRCP
23 12(a). Defendant(s) intends to defend this action and requests an Order granting an
24 extension of time to file the Answer. Affiant states that good cause exists why an
25 Answer has not been made, specifically: _____
26
27
28

1 Therefore, Affiant requests the Court sign an Order extending time to answer or
2 otherwise respond, extending the date to the 30 day of Sept. 2014.

3 I declare under penalty of perjury under the law of the State of Nevada that the
4 foregoing is true and correct.

5 EXECUTED this 22nd day of July, 2014.

6
7 Wesley Y.
8 Affiant
9
10
11
12
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14
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16
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19
20
21
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23
24
25
26
27
28

Notes:

Dear Judge Nathan

I'm Requesting Additional time, to Answer
Interrogatories and for Plaintiff to send
information as to when Defendant can
contact witnesses (See list that needs
to be addressed by plaintiff)

Thank you.
Wesley Lewis

(See list included
Add time requested
Thank you)

EXHIBIT 1

Telephone # List for Judges Staff.
 Sidney Lewis - Grandfather 702-432-3996
 702-336-9786
 Olga Ann Lewis Grandmother - 702-432-3996
 702-767-9283
 Wesley Allen Lewis father 702-
 Maria Daniela Perdomo mother ?

Other Telephone Numbers of Interest

1. MRS. FLOREZ 1st grade teacher
 Telephone # 702-336-6292
- * 2. Kevin Little ^X Boy friend
 702-250-2012 E. FLAMINGO
 702-250-2017 1 Bed Rm Condo
- * 3. Ele Sabat ^X Live in boy friend # 2
 Telephone # ARIA HOTEL - 1 Bed Rm Condo
 702-767-3422
 Work # 988-0000
- * 4. Juan Fuentes New Live in boy friend
 Juanfuentes@gmail.com
 Lives w/ Maria Perdomo at this time.
 Moved to a Two bed Rm Apt after several
 months - Isabella said they all slept in
 the same bed - but that he had his own
 Blanket!

Judge

Note -

EXHIBIT 2

Different Strangers Picking up Isabella
and taking her to School -
Started the week of 4/21/11

Staff #1. Audry Leon (20) times ? Why -

#2. Eli Sabat - Plaintiff Boyfriend

3722 So Las Vegas Blvd Apt 1825

#3

LAS VEGAS NV.

Cell - 702-767-3422

WOAK 982-0000 Salon & Spa

* #4. Kevin Littlejohn NO Address ? Friend !

10/13/10 702-250-2012
250-2017

9100 West FLAMINGO ROAD - #1101

* Eli Sabat - Live in boyfriend one Bd. Apt

ER's Hotel & Casino -

3722 So L.V. Blvd So

10/3/2011 Took her to School ?

11/28/2011 took her to School ?

* Note - Juan ? - New Boyfriend -

Enrollment date 7/28/11

At Pre-School -

Living at 3722 So L.V. Blvd -

With Eli
One Bed Room

1 INT
The Fine & Price Law Group
2 FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
3 Suite 5
8975 South Pecos Road
4 Henderson, Nevada 89074
Telephone: 702/384-8900
5 Facsimile: 702/384/6900
Email: fran@finepricelaw.com
6 Attorneys for Plaintiff
MARIA DANIELA LEWIS nka
7 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,)
MARIA DANIELA PERDOMO,)
11)
Plaintiff;) CASE NO: D-10-427054-D
12 v.) DEPT NO: T
13 WESLEY ALLEN LEWIS,)
DATE OF HEARING: n/a
14 Defendant.)
TIME OF HEARING: n/a
15)

16 Plaintiff's First Set Of Interrogatories

17 TO: WESLEY ALLEN LEWIS, Defendant in Proper Person:

18 Under authority of Rule 33, Nevada Rules Of Civil
19 Procedure, Plaintiff, MARIA DANIELA LEWIS, by and through her
20 attorney, FRANCES-ANN FINE, ESQUIRE, of The Fine & Price Law Group,
21 hereby requests that Defendant answer in writing and under oath
22 within thirty (30) days the following Interrogatories.

23 NOTE: When used in these Interrogatories, the term
24 "DEFENDANT", its plural or any synonym thereof, is intended to and
25 shall embrace and include in addition to the named party or
26 parties, counsel for said party, and all agents, servants,
27 employees, representatives, investigators and others who are in
28 possession of or may have obtained information for or on behalf of

1 the named party or parties. As to each person named in response to
2 each question herein, state the person's full name, last known
3 address, telephone number, job title, and capacity or position at
4 last known employment.

5 In answering these Interrogatories, Defendant is
6 requested to furnish all information available to her at the time
7 the answers are made, including information in the possession of
8 her current or former agents, accountants, attorneys or
9 investigators for her attorneys, not merely information known of
10 the personal knowledge of her officers, directors, agents and
11 employees. If a claim of privilege is made as to any information
12 or documents sought by these Interrogatories, you must specify the
13 basis for privilege and describe the information or documents
14 claimed to be privileged.

15 PRELIMINARY EXPLANATIONS AND DEFINITIONS

16 The following definitions are applicable throughout the
17 Interrogatories which follows:

18 "Facts" means all circumstances, events and evidence
19 pertaining to or touching upon the item in question.

20 "You" refers to the party or parties to whom these
21 Interrogatories are directed.

22 "Witnesses" means the name, address and telephone number
23 of each person having knowledge of or pertaining to the item in
24 question.

25 "Writing" includes, but is not limited to, any record,
26 minutes of meetings, agreement, contract, memorandum, map, diagram,
27 illustration, photograph, telegram, written analysis, report,
28 recording, transcription, and memoranda made of any telephone

1 communication or face-to-face oral meeting or conversation, written
2 communication (which includes, but is not limited to, any letter,
3 inter-office communication and telegram), paper, book or other
4 document. It includes the original, any copy and any drafts
5 thereof.

6 "Statement" includes each recordation of any interview or
7 conversation with a witness, whether by a signed or unsigned
8 writing, recording, court reported statement or otherwise.

9 "Document" includes written reports, letters, books,
10 telegrams, memoranda, drawings, notes, tape recordings,
11 photographs, or any other written or graphic material communication
12 however denominated.

13 "Person" includes natural persons, partnerships,
14 consortiums, joint ventures, and every other form of legally
15 recognized entity, including corporations.

16 "Identify", when used in reference to an individual
17 person, means to:

- 18 1. State his full name;
- 19 2. State his present or last-known address;
- 20 3. State his present or last-known position and
21 business affiliation; and
- 22 4. Describe his relationship to you.

23 "Identify", when used in reference to a corporation,
24 partnership, or entity, means to:

- 25 1. State its full name;
- 26 2. State its present or last-known address;
- 27 3. In the case of a corporation, set forth the state
28 of its incorporation; and

- 1 4. Describe your relationship to it, if any.
- 2 "Identify", when used in reference to a document or
- 3 writing, means to:
- 4 (a) State the date of preparation, author, title (if
- 5 any), subject matter, number of pages, and type of
- 6 document (e.g., contract, letter, reports, etc.) or
- 7 some other means of distinguishing the document or
- 8 writing;
- 9 (b) Identify each and every person who prepared or
- 10 participated in the preparation of the document or
- 11 writing;
- 12 (c) Identify each and every person who received a copy
- 13 of the document;
- 14 (d) State the present location of the document or
- 15 writing;
- 16 (e) Identify each and every person having custody or
- 17 control of the document or writing;
- 18 (f) State whether any copy of the document or writing
- 19 is not identical to the original by reason of
- 20 shorthand or other written notes, initials, or any
- 21 other modifications;
- 22 (g) State, if the document or writing has been
- 23 destroyed, the circumstances surrounding and the
- 24 reason for the destruction;
- 25 (h) Identify, if the document or writing has been
- 26 destroyed, each and every person who destroyed, or
- 27 participated in, or ordered or suggested the
- 28 destruction of it.

1 "Identify", when used in reference to an oral
2 communication other than a meeting, means to:

3 (a) State the date and place of the oral communication
4 or some other means of identifying the oral
5 communication;

6 (b) State the medium through which the oral
7 communication was made (e.g. in person, by
8 telephone, etc.);

9 © Identify each and every person who participated in
10 the oral communication;

11 (d) Identify each and every person (other than a
12 participant) hearing the oral communication;

13 (e) State the substance of the oral communication,
14 including the substance of the discussion (who said
15 what to whom and the order in which it was said)
16 and the decisions reached in the course of or as a
17 result of the oral communication;

18 (f) Identify each and every document concerning what
19 was said in the oral communication.

20 If you cannot answer any of the following Interrogatories
21 in full and complete detail, after exercising due diligence to
22 secure the information to do so, so state, and answer to the extent
23 possible, specifying your inability to answer the remainder, and
24 stating whatever information or knowledge you have concerning the
25 unanswered portion.

26 These Interrogatories shall be deemed continuing so as to
27 require supplemental answers if you or your attorneys obtain
28 further information between the time answers are served and the

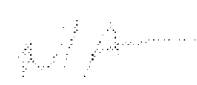
1 time of hearing.

2 INTERROGATORY NO. 1: Please state your full name,
3 your date of birth and your social security number.

4 INTERROGATORY NO. 2: State the name and address of
5 each employer you have had since January 2013 and further list your
6 job title at each place of employment, state your weekly work
7 schedule and provide a detailed description of your job duties.

8 INTERROGATORY NO. 3: State the gross monthly income
9 you have received from each employer listed in response to
10 Interrogatory 2.

11 INTERROGATORY NO. 4: Identify any and all sources of
12 income other than those disclosed in response to Interrogatories 2
13 and 3, including but not limited to: settlements or judgments
14 received from legal actions, gifts from friends, relatives and/or
15 significant others, rental income, gambling winnings, benefits and
16 allowances received from employers, investment income, dividends
17 and disbursements. For any such income received since January
18 2013, please identify:

- 19 1) The source of the income; 
20 2) The date of receipt;
21 3) The dollar amount received; and
22 4) The financial institution or other initial place of
23 deposit of the income.

24 INTERROGATORY NO. 5: Please identify all monetary
25 accounts in all financial institutions in which you have or have
26 had an interest (whether or not your name is on the account), in
27 which you have made a deposit, or from which you have made a
28 withdrawal from January 2013 forward, including but not limited to,

1 checking, savings, certificates of deposit and IRA accounts, as
2 well as any monetary accounts of any business entity in which you
3 have or have had an ownership interest. Such identification shall
4 include the name of each such financial institution and account
5 number associated therewith.

6 INTERROGATORY NO. 6: From January 2013 to the
7 present, please describe any and all efforts that you have made to
8 obtain full-time employment, or to otherwise supplement your income
9 and identify all entities to which you have submitted a resume or
10 application for employment, or otherwise sought employment from.

11 INTERROGATORY NO. 7: For each potential employer from
12 which you have sought employment, or to which you have submitted a
13 resume, please provide the following information:

- 14 1. Company name;
- 15 2. Date of interview;
- 16 3. Salary or Compensation sought;
- 17 4. Nature of employment sought;
- 18 5. Address of company;
- 19 6. Company telephone number;
- 20 7. Address of work location; and
- 21 8. Contact or interviewer's name.

22 INTERROGATORY NO. 8: If you claim to have a
23 disability or medical condition which impacts your ability to work,
24 state in detail the impact of the condition on your earning
25 capacity, any and all work related limitations of your condition,
26 what efforts you have made to secure alternative employment which
27 would not be limited by your condition, whether you have been
28 officially deemed "disabled" pursuant to any administrative or

1 governmental authority, and whether you have ever applied for
2 disability benefits due to the condition.

3 INTERROGATORY NO. 9: Please explain why you and
4 Isabella are sharing a bedroom, despite the availability of two
5 other bedrooms in your home.

6 INTERROGATORY NO. 10: Please explain why Isabella's
7 homework log is not consistently being completed while she is in your
8 care.

9 INTERROGATORY NO. 11: Please explain why Isabella's
10 cellular telephone is consistently uncharged and therefore not
11 operational while she is in your care.

12 INTERROGATORY NO. 12: Please explain why you did not
13 take Isabella to see a doctor on or around January 29, 2014, when
14 she exhibited flu symptoms that resulted in strep throat.

15 INTERROGATORY NO. 13: Please explain why you
16 continue to sleep with a large fan operating in your joint bedroom
17 with Isabella.

18 INTERROGATORY NO. 14: Please state the year, make, and
19 model of any and all vehicles that you currently drive and/or own.
20 For every vehicle that you drive and/or own, please state how the
21 vehicle was purchased, the name of any co-signer, if any, the
22 purchase price of the vehicle, and if any down payments were made,
23 where did the funds for same come from? ~~any~~

24 INTERROGATORY NO. 15: If it is your contention that
25 Maria should not be awarded primary physical custody of Isabella,
26 please provide a detailed explanation of your reasoning.

27 INTERROGATORY NO. 16: For the period from October 8,
28 2013 forward, state the date and amount of each current child

1 support payment you have made to Plaintiff.

2 INTERROGATORY NO. 17: For the period from October 8,
3 2013 forward, state the date and amount of each child support
4 arrears payment you have made to Plaintiff.

5 INTERROGATORY NO. 18: For the period from October 8,
6 2013 forward, state the date and amount of each payment to
7 Plaintiff as and for your half of Isabella's health insurance
8 premium.

9 INTERROGATORY NO. 19: For the period from October 8,
10 2013 forward, state the date and amount of each payment to Kuman
11 Tutoring as and for Isabella's tutoring.

12 INTERROGATORY NO. 20: Identify each and every document
13 used, consulted or relied upon in the preparation of your answers
14 to these Interrogatories.

15 INTERROGATORY NO. 21: Please state the name, address,
16 and telephone number of each and every person who has knowledge of
17 discoverable matters and of facts to support any and all
18 allegations in your papers and pleadings filed in this case.

19 INTERROGATORY NO. 22: State the names, addresses, and
20 telephone numbers of each and every witness you plan on calling on
21 your behalf at the hearing in this matter, as well as the subject
22 matter of each witness' testimony.

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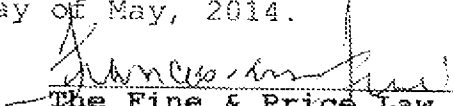
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1 INTERROGATORY NO. 23: Identify by name and description
2 all documents which you plan to offer as proposed exhibits at the
3 hearing on this matter.

4 DATED this 28 day of May, 2014.

5 
6 The Fine & Price Law Group
7 FRANCES-ANN FINE, ESQUIRE
8 Nevada Bar No. 0025
9 Attorney for Plaintiff
10 MARIA DANIELA PERDOMO

10 CERTIFICATE OF MAILING

11 I hereby certify that on the 28th day of May, 2014,
12 service of the foregoing Plaintiff's First Set Of Interrogatories
13 was made by placing a copy of same into the United States Mail,
14 first class postage prepaid, at Las Vegas, Nevada, addressed to the
15 following:

16 Wesley Allen Lewis
17 4650 Idaho Avenue
18 Las Vegas, Nevada 89104

19 
20 An Employee of The Fine & Price Law Group

1 REQ
2 The Fine & Price Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 Suite 5
6 8975 South Pecos Road
7 Henderson, Nevada 89074
8 Telephone: 702/384-8900
9 Facsimile: 702/384/6900
10 Email: fran@finepricelaw.com
11 Attorneys for Plaintiff
12 MARIA DANIELA LEWIS nka
13 MARIA DANIELA PERDOMO

14 DISTRICT COURT

15 CLARK COUNTY, NEVADA

16 MARIA DANIELA LEWIS, nka,)
17 MARIA DANIELA PERDOMO,)
18)
19 Plaintiff;) CASE NO: D-10-427054-D
20 v.) DEPT NO: T
21)
22 WESLEY ALLEN LEWIS,) DATE OF HEARING: n/a
23) TIME OF HEARING: n/a
24 Defendant.)
25)

26 Plaintiff's Request For Production Of Documents

27 TO: WESLEY ALLEN LEWIS, Defendant in Proper Person:

28 Under authority of Rule 34, Nevada Rules Of Civil
Procedure, Plaintiff, MARIA DANIELA PERDOMO, by and through her
attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price Law Group,
does hereby request that Defendant produce within thirty days at
The Fine Law Group, 8975 South Pecos Road, Suite 5, Henderson,
Nevada 89074 the following documents:

REQUEST NO. 1: Copies of any and all documents showing
your income and earnings from all sources, to include copies of any
and all Federal Income Tax Returns, W-2 statements, 1099 forms,
and/or pay stubs received by you from any employer for which you
are, or were, employed, for the period beginning January 1, 2013

1 forward.

2 REQUEST NO. 2: Copies of any and all documents evidencing
3 payments you have made since October 8, 2013 as and for current
4 child support, child support arrears, your contribution towards
5 Isabella's health insurance premium, and Kumon tutoring visits.

6 REQUEST NO. 3: Copies of any and all documentation
7 evidencing expenditures you have made from January 1, 2013 forward
8 for the benefit of Isabella, including but not limited to school-
9 related expenses, tutoring, clothes, medical bills, counseling
10 bills.

11 REQUEST NO. 4: For the period from January 1, 2013
12 forward, copies of all monthly, semi-monthly, annual or any other
13 periodic account statements for any accounts in financial
14 institutions in which you have, or have had, an interest, or made
15 deposits or withdrawals from, including but not limited to,
16 checking accounts, savings accounts, stocks, mutual funds, IRA's,
17 401(k)s, pensions, profit sharing and retirement accounts.

18 REQUEST NO. 5: An updated Financial Disclosure Form.

19 REQUEST NO. 6: Copies of any and all documents which you
20 intend to offer as proposed exhibits at the hearing scheduled in
21 this matter.

22
23 DATED this 28 day of May, 2014.

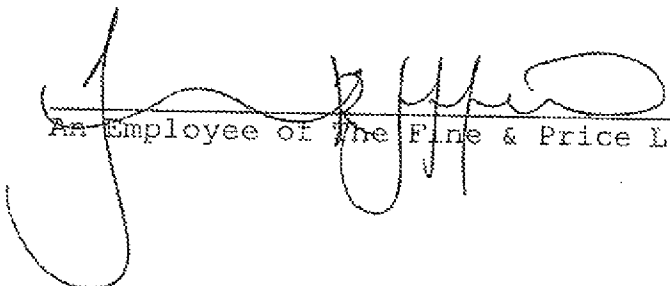
24
25 Frances-Ann Fine
26 The Fine & Price Law Group
27 FRANCES-ANN FINE, ESQ.
28 Nevada Bar No. 0025
 Attorney for Plaintiff
 MARIA DANIELLA PERDOMO

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CERTIFICATE OF MAILING

On this 20th day of May, 2014, a copy of the foregoing
Plaintiff's Request for Production of Documents was served by
placing a copy of same into the United States Mail, first class
postage prepaid at Henderson, Nevada addressed to the following:

Wesley Allen Lewis
4650 Idaho Avenue
Las Vegas, Nevada 89104


An Employee of The Fine & Price Law Group

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EXHIBIT C

Alvin L. Quinn

CLERK OF THE COURT

1 NCOA
(Your Name) Wesley A. Lewis

2
3 (Address) 4650 Idaho Ave

4 LAS Vegas NV 89104

5 (Telephone) 702-432-3996

6 (Email Address) Info4WLewis@yahoo.com

7 In Proper Person

~~MANIA DANIELA FERNANDEZ~~

~~MANIA DANIELA SERINA~~

~~MANIA DANIELA LEWIS~~

~~MANIA LERDOMO~~

DISTRICT COURT

CLARK COUNTY, NEVADA

11 Plaintiff,

12 vs.

13 Wesley Lewis

14 Defendant.

CASE NO.: D10-427054-D

DEPT NO.: T

NOTICE OF CHANGE OF ADDRESS

16 TO: Clerk of Court; and

17 TO: Opposing Counsel or Litigant

18 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE THAT: (☒ check one)

19 ☐ Plaintiff/☒ Defendant has a new mailing address.

20 New Mailing Address: 4650 Idaho Ave

21 LAS Vegas Nevada 89104

22 DATED this 22 day of July, 20 14.

23 (Your Signature) *Wesley Lewis*

24 (Your Printed Name) Wesley LEWIS

CERT

(Your Name) Wesley Allen Lewis

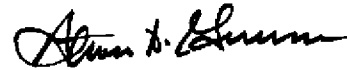
(Address) 4650 Idaho Ave

Las Vegas NV 89104

(Telephone) 702-432-3996

(Email Address) Info4WLEWIS@yahoo.com

In Proper Person



CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

Marla Davida Pardo

Plaintiff,

vs.

Wesley Allen Lewis

Defendant.

CASE NO.: D-10-427054-D

DEPT NO.: T

CERTIFICATE OF MAILING

I, (name of person who mailed document) Wesley Lewis, DO HEREBY
declare under penalty of perjury under the law of the State of Nevada that the following is true
and correct. That on (month) July (day) 22, (year) 14 service of the: (check one)

☐ Answer

☐ Opposition

☐ Motion

☒ Other

Affidavit in Support
of ORDER extending time

was made pursuant to NRCP 5(b) by depositing a copy of same in the U.S. Mail in Las Vegas,
Nevada, postage prepaid, addressed as follows:

(Print the name and address of the person you mailed the documents to)

FRANCES ANN FINE ESQ

8975 S. Pecos Rd #5

HENDERSON NV 89074

DATED this 22 day of July, 20 14



(Signature)

Wesley Allen Lewis

1 CERT

2 (Your Name) Wesley Lewis

3 (Address) 4650 Idaho Ave

4 LAS Vegas NV 89104

5 (Telephone) 702-432-3996

6 (Email Address) Info4WLewis@yahoo.com

7 In Proper Person



CONFIDENTIAL

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Alvin L. Blum

CLERK OF THE COURT

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 Maria Perdomo

11 Plaintiff,

12 vs.

13 Wesley Lewis

14 Defendant.

CASE NO.: D-10-927054-D

DEPT NO.: T

15 CERTIFICATE OF MAILING

16 I, (name of person who mailed document) Wesley Lewis DO HEREBY
17 declare under penalty of perjury under the law of the State of Nevada that the following is true
18 and correct. That on (month) July (day) 21, (year) 14 service of the: (check one)

19 ☐ Answer

☐ Opposition

20 ☒ Motion

☒ Other Injunction

21 was made pursuant to NRCP 5(b) by depositing a copy of same in the U.S. Mail in Las Vegas,
22 Nevada, postage prepaid, addressed as follows:

23 (Print the name and address of the person you mailed the documents to)

24 FRANCES FINE ESQ

25 8975 S. Pecos Rd #5

26 HENDERSON NV - 89074

27 DATED this 21 day of July, 20 14

28 Wesley Lewis
(Signature)

Tracking # 9114 9011 8986 5178 71

INTRODUCTION

1 CERT

2 (Your Name) Wesley Lewis

3 (Address) 4650 Idaho Ave

4 LAS VEGAS NV. 89104

5 (Telephone) 702-432-3996

6 (Email Address) info4wlewis@yahoo.com

7 In Proper Person

COPY

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Allen D. Blum

CLERK OF THE COURT

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 Monia Daniela Perdomo

11 Plaintiff,

12 vs.

13 Wesley Allen Lewis

14 Defendant.

CASE NO.: D-10-427054-0

DEPT NO.: T

15 CERTIFICATE OF MAILING

16 I, (name of person who mailed document) Wesley Lewis, DO HEREBY
17 declare under penalty of perjury under the law of the State of Nevada that the following is true
18 and correct. That on (month) July (day) 2nd, (year) 14 service of the: (check one)

19 ☐ Answer

☒ Opposition

20 ☐ Motion

☐ Other _____

21 was made pursuant to NRCP 5(b) by depositing a copy of same in the U.S. Mail in Las Vegas,
22 Nevada, postage prepaid, addressed as follows:

23 (Print the name and address of the person you mailed the documents to)

24 The Fine & Price Law Group P.A. Francis Fine

25 8975 So. Pecos Rd. #5

26 HENDERSON NV. 89074

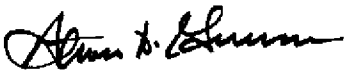
27 DATED this 2nd day of July, 2014

28 Wesley Lewis
(Signature)

USPS TRACKING # 9114 9012 3080 3128 9379 06
3 CUSTOMER
RECEIPT For Tracking or signature go to USPS.com
or call 1-800-222-1811.

Y905 

MEMO
The Fine & Price Law Group
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
8975 South Pecos Road Ste. 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@finepricelaw.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO


CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO,

Plaintiff
v.
WESLEY ALLEN LEWIS,

Defendant.

CASE NO: D-10-427054-D
DEPT NO: T

DATE OF HEARING: 7-29-14
TIME OF HEARING: 1:30 p.m.

Plaintiff's Pre-Evidentiary Hearing Brief

COMES NOW Plaintiff, MARIA DANIELA PERDOMO, formerly known as MARIA DANIELA LEWIS, by and through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price Law Group, pursuant to the Court's Order Setting Evidentiary Hearing filed May 27, 2014, and submits Plaintiff's Pre-Evidentiary Hearing Brief:

POINTS AND AUTHORITIES

I. INTRODUCTION

Plaintiff (hereafter "MARIA") and Defendant (hereafter "WESLEY") were formerly married to one another and are the parents of one minor child, to-wit: ISABELLA SARA LEWIS (hereafter

1 "ISABELLA"), born August 10, 2006. Since the filing of their
2 Decree of Divorce on July 15, 2011, the parties have had joint
3 legal and joint physical custody of ISABELLA.

4 The Decree Of Divorce imposed a child support obligation
5 upon WESLEY effective June 2011. WESLEY's child support obligation
6 of \$440.00 per month was reduced by \$133.00 (one-half of the amount
7 he represented to be the cost of health insurance he was
8 maintaining to cover ISABELLA), resulting in a payment of \$307.00.

9 On May 2, 2013 MARIA filed Plaintiff's Motion To Have
10 Defendant Held In Contempt Of Court, To Enforce Decree of Divorce,
11 To Reduce Child Support Arrears To Judgment, And For Award Of
12 Attorney Fees. WESLEY filed an opposition to MARIA's motion and a
13 countermotion seeking "attorney's fees and related relief". This
14 Court then scheduled an Evidentiary Hearing that was eventually
15 conducted on October 8, 2013.

16 The Court's findings and orders from the October 8, 2013
17 Evidentiary Hearing were thereafter set forth in the Findings Of
18 Fact, Conclusions Of Law And Order filed on December 27, 2013.
19 Those orders are summarized as follows:

20 (1) WESLEY was held in contempt of court for his non-
21 payment of child support in June, July, August and
22 September of 2011; and January, May, June, July,
September, October and November of 2012.

23 (2) WESLEY was sanctioned by the sum of \$500.00 for each
24 of his eleven contempts for a total sanction of
25 \$5,500.00. This was reduced to judgment in favor of
26 MARIA. The Court also imposed a 10 day jail sentence
27 for each of the eleven contempts for a total sentence of
28 110 days. The order provided that "Said jail sentence is
stayed, but will be imposed in the event that Defendant
has any future missed payments to Plaintiff." (Emphasis
added)

(3) MARIA was also awarded a judgment against WESLEY in
the amount of \$15,000.00 as and for attorney fees.

1 (4) WESLEY's child support arrears, exclusive of
2 interest and penalties, were determined to be, through
August 2013, in the amount of \$9,012.38.

3 (5) WESLEY was ordered to bear the cost of ISABELLA's
4 tutoring with Kuman in November 2013, with the parties
each paying one-half the month's tutoring expense
5 commencing December 2013. WESLEY was also ordered to
6 take ISABELLA to Kuman tutoring on Mondays immediately
after school.

7 (6) Effective October 2013, WESLEY's current child
8 support obligation was reduced to \$91.00. He was also
9 ordered to pay MARIA \$50.00 per month for his one-half of
the monthly cost of ISABELLA's health insurance provided
10 by MARIA. Commencing October 2013, WESLEY was also
11 ordered to pay MARIA \$100.00 per month for child support
12 arrears.

13 On March 19, 2014 MARIA filed her Motion To Modify
14 Custody; To Enforce Order Of December 27, 2013; And An Award Of
15 Attorney Fees. The motion alleged that WESLEY had, in essence,
16 ignored this Court's explicit directives as to his financial
17 obligations in this case. It was also demonstrated in that motion
18 that WESLEY had failed to co-parent with MARIA and otherwise failed
19 to take necessary actions for ISABELLA's well-being.

20 This Court issued an Order To Show Cause against WESLEY
21 on March 27, 2014. At a hearing conducted on May 1, 2014, the
22 Court scheduled an Evidentiary Hearing to be conducted on July 29,
23 2014 and August 5, 2014 on both the aforementioned Order To Show
24 Cause and the other relief sought in MARIA's motion (including an
25 award to her of primary physical custody of ISABELLA). In the
26 interim, WESLEY's joint physical custodial status was temporarily
27 altered as follows:

28 **IT IS FURTHER ORDERED** that Defendant's visitation is
hereby temporarily modified until the Evidentiary
Hearing, based on allegations he failed to seek medical
treatment for the minor child, his avoidance of the
police on a well check, not following the court ordered
financial support and not acting in the best interest of

1 the child.

2 IT IS FURTHER ORDERED that Defendant's visitation while
3 the minor child is in school commences on Monday after
4 school through Wednesday at 6:00 p.m. Once school is out
of session, Defendant shall have visitation Monday at
9:00 a.m. through Wednesday at 6:00 p.m.

5 II. ANTICIPATED EVIDENCE

6 The uncontroverted evidence to be adduced at the
7 Evidentiary Hearing will confirm WESLEY's repeated intentional
8 failure to comply with this Court financial orders made at the
9 October 8, 2013 hearing. It was only after having been served with
10 MARIA's motion in March 2014 that he belatedly attempted compliance
11 with those orders.

12 The evidence will also show that WESLEY time and time
13 again failed to act in ISABELLA's best interests, whether that be
14 not addressing her health needs or addressing her educational
15 needs. Interestingly, even after the May 1, 2014 hearing WESLEY
16 has continued to posture rather than co-parent, to fail to support
17 ISABELLA's tutoring, and to attack MARIA.

18 III. WITNESSES

19 MARIA's counsel intends to call both parties as witnesses
20 at the Evidentiary Hearing. It is further anticipated that the
21 following additional witnesses will also be called to testify on
22 MARIA's behalf:

23 1. SARAH BURGESS, ISABELLA's teacher during the last
24 school year.

25 2. WARREN WHEATLEY of Oasis Counseling LLC, who
26 provided therapy for ISABELLA.

27 3. SCOTT NEUAH of Kumon Tutoring.

28 / / /

1 IV. EXHIBITS

2 MARIA's counsel intends to offer the following as
3 exhibits at the evidentiary hearing:

- 4 1. Plaintiff's First Request For Admissions To
5 Defendant.
- 6 2. Plaintiff's First Set Of Interrogatories.
- 7 3. Plaintiff's Request For Production Of Documents.
- 8 4. Nevada Child Support Enforcement Payment Record.
- 9 5. Emails regarding ISABELLA's absence from Kumon
10 Tutoring.
- 11 6. Emails regarding Summer Kumon tutoring.
- 12 7. Emails regarding ISABELLA's dental appointment.
- 13 8. Kumon payment records.
- 14 9. Email regarding ISABELLA's cell phone.
- 15 10. MARIA's updated financial disclosure form.
- 16 11. Oasis Counseling records.

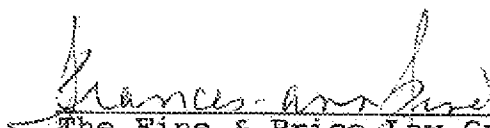
17 In the event that the Court decides to award MARIA attorney fees,
18 her counsel will thereafter serve and file a memorandum of fees and
19 costs which will include both a detailed invoice from The Fine &
20 Price Law Group and a discussion of the Brunzell factors.

21 V. UNUSUAL LEGAL ISSUE

22 On May 28, 2014 MARIA's counsel served WESLEY by mail
23 with Plaintiff's First Request For Admissions To Defendant, a copy
24 of which is attached hereto as Exhibit "1". WESLEY has failed and
25 refused to respond. Therefore, it is requested that this Court
26 deem each Request For Admission admitted. Also on May 28, 2014
27 MARIA's counsel served WESLEY by mail with Plaintiff's First Set Of
28 Interrogatories (see Exhibit "2") and Plaintiff's Request For

1 Production Of Documents (see Exhibit "3"). WESLEY has ignored
2 these discovery requests as well. Based upon WESLEY's failure to
3 participate in the discovery process, thereby negatively impacting
4 MARIA's preparation for the Evidentiary Hearing, it is requested
5 that he be barred from introducing evidence at said Evidentiary
6 Hearing and that the relief sought by MARIA be summarily granted.

7 DATED this 22 day of July, 2014..

8
9 
10 The Fine & Price Law Group
11 FRANCES-ANN FINE, ESQ.
12 Nevada Bar No. 0025
13 Attorney for Plaintiff
14 MARIA DANIELA PERDOMO

14 CERTIFICATE OF SERVICE

15 I HEREBY CERTIFY that on this 22nd day of July, 2014, a
16 copy of the foregoing Plaintiff's Pre-Evidentiary Hearing Brief was
17 placed into the United States Mail, first class postage prepaid, at
18 Henderson, Nevada, addressed to the following:

19 Wesley Allen Lewis
20 4650 Idaho Avenue
21 Las Vegas, Nevada 89104

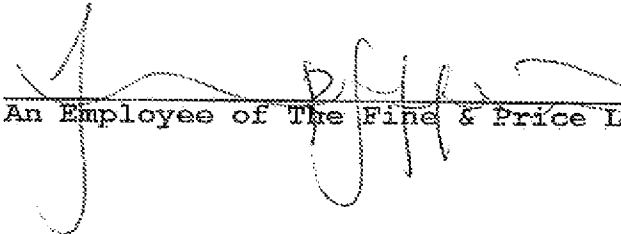
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23 
24 An Employee of The Fine & Price Law Group
25
26
27
28

EXHIBIT "1"

1 ADMS
The Fine & Price Law Group
2 FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
3 Suite 5
8975 South Pecos Road
4 Henderson, Nevada 89074
Telephone: 702/384-8900
5 Facsimile: 702/384/6900
Email: fran@finepricelaw.com
6 Attorneys for Plaintiff
MARIA DANIELA LEWIS nka
7 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,)	
MARIA DANIELA PERDOMO,)	
)	
Plaintiff;)	CASE NO: D-10-427054-D
12 v.)	DEPT NO: T
)	
13 WESLEY ALLEN LEWIS,)	DATE OF HEARING: n/a
)	TIME OF HEARING: n/a
14 Defendant.)	

15 Plaintiff's First Request For Admissions To Defendant

16 TO: WESLEY ALLEN LEWIS, Defendant:

17
18 COMES NOW Plaintiff, MARIA DANIELA PERDOMO, by and
19 through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price
20 Law Group, and hereby propounds the following requests for
21 admission upon Defendant, WESLEY ALLEN LEWIS, pursuant to Rule 36
22 of Nevada Rules of Civil Procedure, which must be answered under
23 oath and in writing within thirty (30) days of service herewith.

24 GENERAL INSTRUCTIONS

25 Pursuant to Rule 36 of the Nevada Rules of Civil
26 Procedure, any matter is deemed admitted unless written answer or
27 objection addressed to the matter signed by you is filed within
28 thirty (30) days after service of this request. If any objection

1 is made, the reasons therefore must be stated. The answer should
2 specifically deny any request not specifically admitted, or should
3 set forth in detail the reason why the answering party cannot
4 truthfully admit or deny any particular request.

5 A denial shall thoroughly meet the substance of the
6 request for admissions, and when good faith requires that a party
7 qualify its answer or deny only a part of the matter in which an
8 admission is requested, the party shall specify so much of it is
9 true and qualify or deny the remainder. The Plaintiff should not
10 give lack of information or knowledge as a reason for failure to
11 admit or deny unless they can state that a reasonable inquiry has
12 been made and that the information known or readily available and
13 obtainable to them is insufficient to enable them to admit or deny.

14 REQUEST FOR ADMISSION NO. 1: Admit that you work less
15 than forty hours per week at your place of employment.

16 REQUEST FOR ADMISSION NO. 2: Admit that you have not
17 since October 8, 2013 applied for full-time employment with any
18 entity.

19 REQUEST FOR ADMISSION NO. 3: Admit that you have not
20 made timely \$91.00 per month current child support payments to
21 Plaintiff commencing October 2013.

22 REQUEST FOR ADMISSION NO. 4: Admit that you have not
23 made timely \$100.00 per month child support arrears payments to
24 Plaintiff commencing October 2013.

25 REQUEST FOR ADMISSION NO. 5: Admit that you have not made
26 timely \$50.00 per month payments to Plaintiff as and for half of
27 your minor child's health insurance premiums commencing October
28 2013.

1 REQUEST FOR ADMISSION NO. 6: Admit that since October
2 2013 you have not made monthly payments directly to Kumon each and
3 every month as and for one-half of Isabella's tutoring costs.

4 REQUEST FOR ADMISSION NO. 7: Admit that you have made no
5 payments to Plaintiff in partial satisfaction of the \$5,500.00
6 contempt judgment rendered by the Court.

7 REQUEST FOR ADMISSION NO. 8: Admit that you have made no
8 payments to Plaintiff in partial satisfaction of the \$15,000.00
9 attorney fees judgment rendered by the Court.

10 REQUEST FOR ADMISSION NO. 9: Admit that Isabella is
11 consistently not completing her nightly homework assignments while
12 in your care.

13 REQUEST FOR ADMISSION NO. 10: Admit that Isabella
14 experienced a drop in her grades between the first and second
15 trimester of the 2013-2014 school year, including an entire letter
16 grade drop in "writing".

17 REQUEST FOR ADMISSION NO. 11: Admit that Isabella's
18 school absences more than doubled between the first and second
19 trimester of the 2013-2014 academic year.

20 REQUEST FOR ADMISSION NO. 12: Admit that despite
21 receiving detailed instructions on how to treat Isabella's Eczema,
22 you did not fully follow the instructions.

23 REQUEST FOR ADMISSION NO. 13: Admit that on January 29,
24 2014, you did not take Isabella to see a doctor for flu symptoms
25 that turned out be strep throat.

26 REQUEST FOR ADMISSION NO. 14: Admit that Warren Wheatly,
27 a licensed counselor, has diagnosed Isabella with generalized
28 anxiety disorder.

1 REQUEST FOR ADMISSION NO. 15: Admit that despite the fact
2 that Isabella began counseling on September 21, 2013, the first time
3 you ever attended a session was after you received notice that Maria
4 had already filed the motion to modify custody on March 19, 2014.

5 REQUEST FOR ADMISSION NO. 16: Admit that from October 8,
6 2013 forward you have not taken Isabella for treatment by a health
7 care professional.

8 REQUEST FOR ADMISSION NO. 17: Admit that on February 26,
9 2014, you were escorted home by police officers who arrived at your
10 residence after Maria called them for a wellness check on Isabella.

11 REQUEST FOR ADMISSION NO. 18: Admit that while in your
12 care, after October 8, 2013 Isabella continued to sleep in the same
13 room as you.

DATED this 28 day of May, 2014.

The Fine & Price Law Group
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
Attorneys for Plaintiff
MARIA DANIELA PERDOMO

CERTIFICATE OF MAILING

20 I hereby certify that on this 18th day of May, 2014, a
21 copy of the foregoing Plaintiff's First Request for Admissions to
22 Defendant was placed into the United States Mail, first class
23 postage prepaid at Henderson, Nevada, addressed to the following:

Wesley Allen Lewis
4650 Idaho Avenue
Las Vegas, NV 89104

An Employee of The Fine & Price Law Group

EXHIBIT "2"

1 INT
The Fine & Price Law Group
2 FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
3 Suite 5
8975 South Pecos Road
4 Henderson, Nevada 89074
Telephone: 702/384-8900
5 Facsimile: 702/384/6900
Email: fran@finepricelaw.com
6 Attorneys for Plaintiff
MARIA DANIELA LEWIS nka
7 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,)
11 MARIA DANIELA PERDOMO,)
12 Plaintiff;) CASE NO: D-10-427054-D
13 v.) DEPT NO: T
14 WESLEY ALLEN LEWIS,)
15 Defendant.) DATE OF HEARING: n/a
TIME OF HEARING: n/a

16 Plaintiff's First Set Of Interrogatories

17 TO: WESLEY ALLEN LEWIS, Defendant in Proper Person:

18 Under authority of Rule 33, Nevada Rules Of Civil
19 Procedure, Plaintiff, MARIA DANIELA LEWIS, by and through her
20 attorney, FRANCES-ANN FINE, ESQUIRE, of The Fine & Price Law Group,
21 hereby requests that Defendant answer in writing and under oath
22 within thirty (30) days the following Interrogatories.

23 NOTE: When used in these Interrogatories, the term
24 "DEFENDANT", its plural or any synonym thereof, is intended to and
25 shall embrace and include in addition to the named party or
26 parties, counsel for said party, and all agents, servants,
27 employees, representatives, investigators and others who are in
28 possession of or may have obtained information for or on behalf of

1 the named party or parties. As to each person named in response to
2 each question herein, state the person's full name, last known
3 address, telephone number, job title, and capacity or position at
4 last known employment.

5 In answering these Interrogatories, Defendant is
6 requested to furnish all information available to her at the time
7 the answers are made, including information in the possession of
8 her current or former agents, accountants, attorneys or
9 investigators for her attorneys, not merely information known of
10 the personal knowledge of her officers, directors, agents and
11 employees. If a claim of privilege is made as to any information
12 or documents sought by these Interrogatories, you must specify the
13 basis for privilege and describe the information or documents
14 claimed to be privileged.

15 PRELIMINARY EXPLANATIONS AND DEFINITIONS

16 The following definitions are applicable throughout the
17 Interrogatories which follows:

18 "Facts" means all circumstances, events and evidence
19 pertaining to or touching upon the item in question.

20 "You" refers to the party or parties to whom these
21 Interrogatories are directed.

22 "Witnesses" means the name, address and telephone number
23 of each person having knowledge of or pertaining to the item in
24 question.

25 "Writing" includes, but is not limited to, any record,
26 minutes of meetings, agreement, contract, memorandum, map, diagram,
27 illustration, photograph, telegram, written analysis, report,
28 recording, transcription, and memoranda made of any telephone

1 communication or face-to-face oral meeting or conversation, written
2 communication (which includes, but is not limited to, any letter,
3 inter-office communication and telegram), paper, book or other
4 document. It includes the original, any copy and any drafts
5 thereof.

6 "Statement" includes each recordation of any interview or
7 conversation with a witness, whether by a signed or unsigned
8 writing, recording, court reported statement or otherwise.

9 "Document" includes written reports, letters, books,
10 telegrams, memoranda, drawings, notes, tape recordings,
11 photographs, or any other written or graphic material communication
12 however denominated.

13 "Person" includes natural persons, partnerships,
14 consortiums, joint ventures, and every other form of legally
15 recognized entity, including corporations.

16 "Identify", when used in reference to an individual
17 person, means to:

- 18 1. State his full name;
- 19 2. State his present or last-known address;
- 20 3. State his present or last-known position and
21 business affiliation; and
- 22 4. Describe his relationship to you.

23 "Identify", when used in reference to a corporation,
24 partnership, or entity, means to:

- 25 1. State its full name;
- 26 2. State its present or last-known address;
- 27 3. In the case of a corporation, set forth the state
28 of its incorporation; and

- 1 4. Describe your relationship to it, if any.
- 2 "Identify", when used in reference to a document or
- 3 writing, means to:
- 4 (a) State the date of preparation, author, title (if
- 5 any), subject matter, number of pages, and type of
- 6 document (e.g., contract, letter, reports, etc.) or
- 7 some other means of distinguishing the document or
- 8 writing;
- 9 (b) Identify each and every person who prepared or
- 10 participated in the preparation of the document or
- 11 writing;
- 12 (c) Identify each and every person who received a copy
- 13 of the document;
- 14 (d) State the present location of the document or
- 15 writing;
- 16 (e) Identify each and every person having custody or
- 17 control of the document or writing;
- 18 (f) State whether any copy of the document or writing
- 19 is not identical to the original by reason of
- 20 shorthand or other written notes, initials, or any
- 21 other modifications;
- 22 (g) State, if the document or writing has been
- 23 destroyed, the circumstances surrounding and the
- 24 reason for the destruction;
- 25 (h) Identify, if the document or writing has been
- 26 destroyed, each and every person who destroyed, or
- 27 participated in, or ordered or suggested the
- 28 destruction of it.

1 "Identify", when used in reference to an oral
2 communication other than a meeting, means to:

- 3 (a) State the date and place of the oral communication
4 or some other means of identifying the oral
5 communication;
- 6 (b) State the medium through which the oral
7 communication was made (e.g. in person, by
8 telephone, etc.);
- 9 © Identify each and every person who participated in
10 the oral communication;
- 11 (d) Identify each and every person (other than a
12 participant) hearing the oral communication;
- 13 (e) State the substance of the oral communication,
14 including the substance of the discussion (who said
15 what to whom and the order in which it was said)
16 and the decisions reached in the course of or as a
17 result of the oral communication;
- 18 (f) Identify each and every document concerning what
19 was said in the oral communication.

20 If you cannot answer any of the following Interrogatories
21 in full and complete detail, after exercising due diligence to
22 secure the information to do so, so state, and answer to the extent
23 possible, specifying your inability to answer the remainder, and
24 stating whatever information or knowledge you have concerning the
25 unanswered portion.

26 These Interrogatories shall be deemed continuing so as to
27 require supplemental answers if you or your attorneys obtain
28 further information between the time answers are served and the

1 time of hearing.

2 INTERROGATORY NO. 1: Please state your full name,
3 your date of birth and your social security number.

4 INTERROGATORY NO. 2: State the name and address of
5 each employer you have had since January 2013 and further list your
6 job title at each place of employment, state your weekly work
7 schedule and provide a detailed description of your job duties.

8 INTERROGATORY NO. 3: State the gross monthly income
9 you have received from each employer listed in response to
10 Interrogatory 2.

11 INTERROGATORY NO. 4: Identify any and all sources of
12 income other than those disclosed in response to Interrogatories 2
13 and 3, including but not limited to: settlements or judgments
14 received from legal actions, gifts from friends, relatives and/or
15 significant others, rental income, gambling winnings, benefits and
16 allowances received from employers, investment income, dividends
17 and disbursements. For any such income received since January
18 2013, please identify:

- 19 1) The source of the income;
20 2) The date of receipt;
21 3) The dollar amount received; and
22 4) The financial institution or other initial place of
23 deposit of the income.

24 INTERROGATORY NO. 5: Please identify all monetary
25 accounts in all financial institutions in which you have or have
26 had an interest (whether or not your name is on the account), in
27 which you have made a deposit, or from which you have made a
28 withdrawal from January 2013 forward, including but not limited to,

1 checking, savings, certificates of deposit and IRA accounts, as
2 well as any monetary accounts of any business entity in which you
3 have or have had an ownership interest. Such identification shall
4 include the name of each such financial institution and account
5 number associated therewith.

6 INTERROGATORY NO. 6: From January 2013 to the
7 present, please describe any and all efforts that you have made to
8 obtain full-time employment, or to otherwise supplement your income
9 and identify all entities to which you have submitted a resume or
10 application for employment, or otherwise sought employment from.

11 INTERROGATORY NO. 7: For each potential employer from
12 which you have sought employment, or to which you have submitted a
13 resume, please provide the following information:

- 14 1. Company name;
- 15 2. Date of interview;
- 16 3. Salary or Compensation sought;
- 17 4. Nature of employment sought;
- 18 5. Address of company;
- 19 6. Company telephone number;
- 20 7. Address of work location; and
- 21 8. Contact or interviewer's name.

22 INTERROGATORY NO. 8: If you claim to have a
23 disability or medical condition which impacts your ability to work,
24 state in detail the impact of the condition on your earning
25 capacity, any and all work related limitations of your condition,
26 what efforts you have made to secure alternative employment which
27 would not be limited by your condition, whether you have been
28 officially deemed "disabled" pursuant to any administrative or

1 governmental authority, and whether you have ever applied for
2 disability benefits due to the condition.

3 INTERROGATORY NO. 9: Please explain why you and
4 Isabella are sharing a bedroom, despite the availability of two
5 other bedrooms in your home.

6 INTERROGATORY NO. 10: Please explain why Isabella's
7 homework log is not consistently being completed while she in your
8 care.

9 INTERROGATORY NO. 11: Please explain why Isabella's
10 cellular telephone is consistently uncharged and therefore not
11 operational while she is in your care.

12 INTERROGATORY NO. 12: Please explain why you did not
13 take Isabella to see a doctor on or around January 29, 2014, when
14 she exhibited flu symptoms that resulted in strep throat.

15 INTERROGATORY NO. 13: Please explain why you
16 continue to sleep with a large fan operating in your joint bedroom
17 with Isabella.

18 INTERROGATORY NO. 14: Please state the year, make, and
19 model of any and all vehicles that you currently drive and/or own.
20 For every vehicle that you drive and/or own, please state how the
21 vehicle was purchases, the name of any co-signer, if any, the
22 purchase price of the vehicle, and if any down payments were made,
23 where did the funds for same come from?

24 INTERROGATORY NO. 15: If it is your contention that
25 Maria should not be awarded primary physical custody of Isabella,
26 please provide a detailed explanation of your reasoning.

27 INTERROGATORY NO. 16: For the period from October 8,
28 2013 forward, state the date and amount of each current child

1 support payment you have made to Plaintiff.

2 INTERROGATORY NO. 17: For the period from October 8,
3 2013 forward, state the date and amount of each child support
4 arrears payment you have made to Plaintiff.

5 INTERROGATORY NO. 18: For the period from October 8,
6 2013 forward, state the date and amount of each payment to
7 Plaintiff as and for your half of Isabella's health insurance
8 premium.

9 INTERROGATORY NO. 19: For the period from October 8,
10 2013 forward, state the date and amount of each payment to Kuman
11 Tutoring as and for Isabella's tutoring.

12 INTERROGATORY NO. 20: Identify each and every document
13 used, consulted or relied upon in the preparation of your answers
14 to these Interrogatories.

15 INTERROGATORY NO. 21: Please state the name, address,
16 and telephone number of each and every person who has knowledge of
17 discoverable matters and of facts to support any and all
18 allegations in your papers and pleadings filed in this case.

19 INTERROGATORY NO. 22: State the names, addresses, and
20 telephone numbers of each and every witness you plan on calling on
21 your behalf at the hearing in this matter, as well as the subject
22 matter of each witness' testimony.

23 / / /

24 / / /

25 / / /

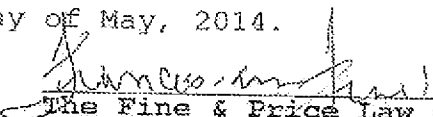
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1 INTERROGATORY NO. 23: Identify by name and description
2 all documents which you plan to offer as proposed exhibits at the
3 hearing on this matter.

4 DATED this 28 day of May, 2014.

5 
6 The Fine & Price Law Group
7 FRANCES-ANN FINE, ESQUIRE
8 Nevada Bar No. 0025
9 Attorney for Plaintiff
10 MARIA DANIELA PERDOMO

11 CERTIFICATE OF MAILING

12 I hereby certify that on the 28th day of May, 2014,
13 service of the foregoing Plaintiff's First Set Of Interrogatories
14 was made by placing a copy of same into the United States Mail,
15 first class postage prepaid, at Las Vegas, Nevada, addressed to the
16 following:

17 Wesley Allen Lewis
18 4650 Idaho Avenue
19 Las Vegas, Nevada 89104

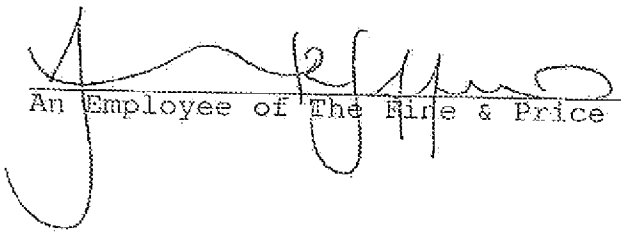
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21 An Employee of The Fine & Price Law Group
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EXHIBIT "3"

1 REQT
The Fine & Price Law Group
2 FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
3 Suite 5
8975 South Pecos Road
4 Henderson, Nevada 89074
Telephone: 702/384-8900
5 Facsimile: 702/384/6900
Email: fran@finepricelaw.com
6 Attorneys for Plaintiff
MARIA DANIELA LEWIS nka
7 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,)
MARIA DANIELA PERDOMO,)
11)
Plaintiff;) CASE NO: D-10-427054-D
12 v.) DEPT NO: T
13 WESLEY ALLEN LEWIS,)
DATE OF HEARING: n/a
14 Defendant.) TIME OF HEARING: n/a
15)

16 Plaintiff's Request For Production Of Documents

17 TO: WESLEY ALLEN LEWIS, Defendant in Proper Person:

18 Under authority of Rule 34, Nevada Rules Of Civil
19 Procedure, Plaintiff, MARIA DANIELA PERDOMO, by and through her
20 attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price Law Group,
21 does hereby request that Defendant produce within thirty days at
22 The Fine Law Group, 8975 South Pecos Road, Suite 5, Henderson,
23 Nevada 89074 the following documents:

24 REQUEST NO. 1: Copies of any and all documents showing
25 your income and earnings from all sources, to include copies of any
26 and all Federal Income Tax Returns, W-2 statements, 1099 forms,
27 and/or pay stubs received by you from any employer for which you
28 are, or were, employed, for the period beginning January 1, 2013

1 forward.

2 REQUEST NO. 2: Copies of any and all documents evidencing
3 payments you have made since October 8, 2013 as and for current
4 child support, child support arrears, your contribution towards
5 Isabella's health insurance premium, and Kumon tutoring visits.

6 REQUEST NO. 3: Copies of any and all documentation
7 evidencing expenditures you have made from January 1, 2013 forward
8 for the benefit of Isabella, including but not limited to school-
9 related expenses, tutoring, clothes, medical bills, counseling
10 bills.

11 REQUEST NO. 4: For the period from January 1, 2013
12 forward, copies of all monthly, semi-monthly, annual or any other
13 periodic account statements for any accounts in financial
14 institutions in which you have, or have had, an interest, or made
15 deposits or withdrawals from, including but not limited to,
16 checking accounts, savings accounts, stocks, mutual funds, IRA's,
17 401(k)s, pensions, profit sharing and retirement accounts.

18 REQUEST NO. 5: An updated Financial Disclosure Form.

19 REQUEST NO. 6: Copies of any and all documents which you
20 intend to offer as proposed exhibits at the hearing scheduled in
21 this matter.

22

23 DATED this 28 day of May, 2014.

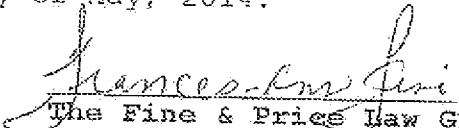
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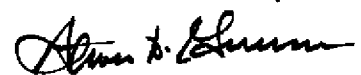
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The Fine & Price Law Group
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
Attorney for Plaintiff
MARIA DANIELLA PERDOMO

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Wesley Allen Lewis
4650 Idaho Avenue
Las Vegas, Nevada 89104

An Employee of The Fine & Price Law Group



CLERK OF THE COURT

COM
THE FINE & PRICE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

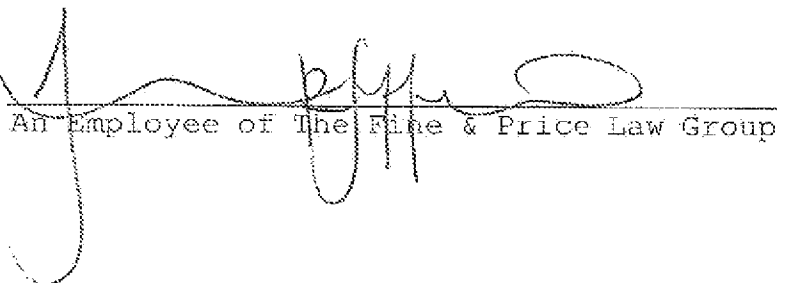
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10-427043-D
Plaintiff,)	DEPT. NO. T
)	
vs.)	DATE OF HEARING: 7/29/14
)	TIME OF HEARING: 1:30 p.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

CERTIFICATE OF MAILING

I hereby certify that on 22nd day of July, 2014, service of Plaintiff's Proposed Exhibits and Plaintiff's Pre-Evidentiary Hearing Brief was made by placing a copy of same into the United States Mail, first class postage prepaid, at Las Vegas, Nevada, addressed to:

Wesley Lewis
4650 Idaho Avenue
Las Vegas, Nevada 89104



An Employee of The Fine & Price Law Group

Allen B. Shuman

CLERK OF THE COURT

SCHD
The Fine & Price Law Group
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Attorney for Plaintiff
MARIA DANIELA PERDOMO

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

CASE NO. D-10-427054-D

DEPT. NO. T

DATE OF HEARING:

TIME OF HEARING:

SCHEDULE OF ARREARAGES

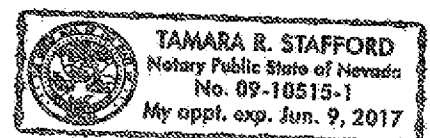
I am owed and entitled to receive certain periodic monthly payments in the form of medical insurance and reimbursement for tutoring through Kumon for the parties minor child as well as contempt charges and Attorney Fee Award from Defendant, WESLEY LEWIS, pursuant to the Findings of Fact, Conclusions of Law and Order filed December 27, 2013. Defendant has failed to make all of those payments when due as set forth herein. The following schedules are true and accurate statements of all payment due dates and of any payments received by me during the month noted.

Further, affiant sayeth naught.

MARIA PERDOMO
MARIA PERDOMO

SUBSCRIBED AND SWORN to before me this
27th day of July, 2013.

[Signature]
NOTARY PUBLIC in and for County and State



MEDICAL/KUMON/CONTEMPT AND ATTORNEY FEE EXPENSE ARREARS

Date Expense Incurred	Amount of Expense	Date Proof of Payment Provided	Amount Paid	Outstanding Expense Arrears
Medical				
10.1.2013	50.00		0.00	50.00
11.1.2013	50.00		0.00	100.00
12.1.2013	50.00		0.00	150.00
1.1.2014	50.00		0.00	200.00
2.1.2014	50.00	2.1.2014	50.00	200.00
3.1.2014	50.00	3.1.2014	50.00	200.00
4.1.2014	50.00	4.1.2014	50.00	200.00
5.1.2014	50.00	5.1.2014	50.00	200.00
6.1.2014	50.00	6.1.2014	50.00	200.00
7.1.2014	50.00	7.1.2014	50.00	200.00
				\$200.00
Kumon				
11.1.2013	200.00		0.00	200.00
12.1.2013	100.00		0.00	300.00
1.1.2014	100.00		0.00	400.00
2.1.2014	100.00		0.00	500.00
3.1.2014	100.00		0.00	600.00
4.1.2014	100.00		0.00	700.00
5.1.2014	100.00		0.00	800.00
6.1.2014	100.00		0.00	900.00
7.1.2014	100.00		0.00	1,000.00
				\$1,000.00

1 SCHD
The Fine & Price Law Group
2 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
3 8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
4 Telephone: 702/384-8900
Facsimile: 702/384-6900
5 fran@thefinelawgroup.com
Attorney for Plaintiff
6 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

Electronically Filed
07/29/2014 10:41:22 AM

Ann L. Quinn
CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

CASE NO. D-10-427054-D
DEPT. NO. T

DATE OF HEARING:
TIME OF HEARING:

SCHEDULE OF ARREARAGES

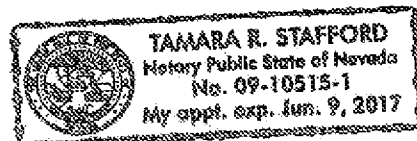
I am owed and entitled to receive certain periodic
monthly payments in the form of child support from Defendant,
WESLEY LEWIS, pursuant to the Findings of Fact, Conclusions of Law
and Order filed December 27, 2013. Defendant has failed to make
all of those payments when due as set forth herein. The following
schedules are true and accurate statements of all payment due dates
and of any payments received by me during the month noted.

Further, affiant sayeth Naught.

us
MARIA PERDOMO

SUBSCRIBED AND SWORN to before me this
27th day of July, 2013.

NOTARY PUBLIC in and for
County and State



Arrearage Calculation Summary

Predomo vs. Lewis 2

Page: 1

Report Date: 07/29/2014

Summary of Amounts Due

Total Principal Due 07/01/2014:	\$7,903.05
Total Interest Due 07/01/2014:	\$365.78
Total Penalty Due 07/01/2014:	\$631.06
Amount Due if paid on 07/01/2014:	\$8,899.89
Amount Due if paid on 07/02/2014:	\$8,903.19
Daily Amount accruing as of 07/02/2014:	\$3.30

Date Due	Amount Due	Date Received	Amount Received	Accum. Arrearage	Accum. Interest
10/01/2013	*91.00	10/01/2013	0.00	91.00	0.00
10/14/2013	*9,025.35	10/14/2013	0.00	9,116.35	0.17
11/01/2013	*91.00	11/01/2013	0.00	9,207.35	23.77
12/01/2013	*91.00	12/01/2013	0.00	9,298.35	63.50
01/01/2014	*91.00	01/01/2014	0.00	9,389.35	104.96
02/01/2014	*91.00	02/01/2014	150.00	9,330.35	146.82
03/01/2014	*91.00	03/01/2014	176.46	9,244.89	184.40
04/01/2014	*91.00	04/01/2014	1,176.46	8,159.43	225.62
05/01/2014	*91.00	05/01/2014	176.46	8,073.97	260.83
06/01/2014	*91.00	06/01/2014	176.46	7,988.51	296.83
07/01/2014	*91.00	07/01/2014	176.46	7,903.05	365.78
Totals	9,935.35		2,032.30	7,903.05	365.78

* Indicates a payment due is designated as child support.

Child Support Penalty Table

Date Due	Amount Due	Accum. Child Sup. Arrearage	Accum. Penalty
10/01/2013	*91.00	0.00	0.00
10/14/2013	*9,025.35	91.00	0.32
11/01/2013	*91.00	9,116.35	45.28
12/01/2013	*91.00	9,207.35	120.96
01/01/2014	*91.00	9,298.35	199.93
02/01/2014	*91.00	9,330.35	279.68
03/01/2014	*91.00	9,244.89	351.25
04/01/2014	*91.00	8,159.43	429.77
05/01/2014	*91.00	8,073.97	496.83
06/01/2014	*91.00	7,988.51	565.41
07/01/2014	*91.00	7,903.05	631.07
Totals	9,935.35	7,903.05	631.07

* Indicates a payment due is designated as child support.

Notes:

Payments are applied to oldest unpaid balance.
 Interest and penalties are calculated using number of days past due.
 Payments apply to principal amounts only.
 Interest is not compounded, but accrued only.
 Penalties calculated on past due child support amounts per NRS 125B.095.

Interest Rates Used by Program:

7.00%	from Jan 1960 to Jun 1979		8.00%	from Jul 1979 to Jun 1981
12.00%	from Jul 1981 to Jun 1987		10.25%	from Jul 1987 to Dec 1987
10.75%	from Jan 1988 to Jun 1988		11.00%	from Jul 1988 to Dec 1988
12.50%	from Jan 1989 to Jun 1989		13.00%	from Jul 1989 to Dec 1989
12.50%	from Jan 1990 to Jun 1990		12.00%	from Jul 1990 to Jun 1991
10.50%	from Jul 1991 to Dec 1991		8.50%	from Jan 1992 to Dec 1992
8.00%	from Jan 1993 to Jun 1994		9.25%	from Jul 1994 to Dec 1994
10.50%	from Jan 1995 to Jun 1995		11.00%	from Jul 1995 to Dec 1995
10.50%	from Jan 1996 to Jun 1996		10.25%	from Jul 1996 to Jun 1997
10.50%	from Jul 1997 to Dec 1998		9.75%	from Jan 1999 to Dec 1999
10.25%	from Jan 2000 to Jun 2000		11.50%	from Jul 2000 to Jun 2001
8.75%	from Jul 2001 to Dec 2001		6.75%	from Jan 2002 to Dec 2002
6.25%	from Jan 2003 to Jun 2003		6.00%	from Jul 2003 to Dec 2003
6.00%	from Jan 2004 to Jun 2004		6.25%	from Jul 2004 to Dec 2004
7.25%	from Jan 2005 to Jun 2005		8.25%	from Jul 2005 to Dec 2005
9.25%	from Jan 2006 to Jun 2006		10.25%	from Jul 2006 to Dec 2007
9.25%	from Jan 2008 to Jun 2008		7.00%	from Jul 2008 to Dec 2008
5.25%	from Jan 2009 to Dec 2012		5.25%	from Jan 2013 to Jun 2013
5.25%	from Jul 2013 to Dec 2013		5.25%	from Jan 2014 to Jun 2014
5.25%	from Jan 2014 to Jun 2014		5.25%	from Jul 2014 to Dec 2014

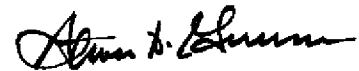
Report created by:

Marshal Law version 4.0

Copyright (c) 1991, 1999, 2001, 2013 Willick Law Group, LLC

The Fine & Price Law Group - Fran@finepricelaw.com - (702) 384-8900

End of Report



CLERK OF THE COURT

EXPARTE MOT
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10-427054-D
Plaintiff,)	DEPT. NO. T
)	
vs.)	
)	
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

EX PARTE REQUEST FOR CLARIFICATION AND/OR INSTRUCTIONS

COMES NOW Plaintiff, MARIA DANIELA PERDOMO (formerly known as MARIA DANIELA LEWIS), by and through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price Law Group, and moves this Court for the issuance of a minute order clarifying the minor child's tutoring and timeshare schedule modification.

This Ex Parte request is made and based upon all papers and pleadings on file herein, Points And Authorities submitted herewith, exhibits attached hereto, and such further argument as may be adduced at the hearing of this motion.

/ / /

/ / /

POINTS AND AUTHORITIES

I. FACTS

Plaintiff (hereafter "MARIA") and Defendant (hereafter "WESLEY") were last before this Court on August 5, 2014 for evidentiary hearing on custodial issues and the Order To Show Cause issued against Wesley.

The Court found Wesley in contempt for failing to take the parties' minor child to her tutoring sessions and modified the custodial timeshare schedule due to Wesley's misconduct.

As a result of the Defendant's actions, he no longer has joint physical custody. Plaintiff has been awarded primary physical custody and Defendant is to enjoy visitation with his minor daughter on alternating weekends from Friday after school until Sunday at 5:00 p.m., and a dinner date with the minor child every Monday and Tuesday beginning after school and concluding at 7:00 p.m. *Exhibit 1, Court Minutes from August 5, 2014 Hearing.*

The parties' minor child continues to attend tutoring at Kumon on Mondays. The timeshare modification noted above remains in conflict with this tutoring schedule and no direction was provided to the Defendant of the mandatory requirement that the child attend on his time, and at his expense. On the first day of school, to wit: August 25, 2014 the Defendant indeed picked up his daughter from school, but did not take the child to Kumon's, and instead they played video games.

It is therefore respectfully requested that further instructions/clarification be provided regarding the interaction between Wesley's visitation time and the child's tutoring classes.

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II. Conclusion

For the foregoing reasons the Plaintiff simply requests clarification as to whether the Defendant is responsible for the tutoring and if so, then the Order will so require and if not, then the Plaintiff respectfully requests that the visitation on Monday nights be terminated.

DATED this 25th day of August, 2014.

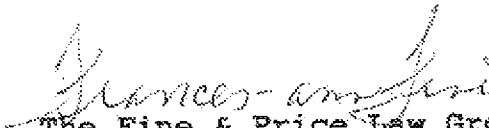

The Fine & Price Law Group
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

EXHIBIT "1"

Skip to Main Content Logout My Account My Cases Search Menu New Family Record
Search Refine Search Close

Location : Family Courts Images Help

REGISTER OF ACTIONS

CASE NO. D-10-427054-D

Maria Daniela Lewis, Plaintiff vs. Wesley Allen Lewis, Defendant.

Case Type: Divorce - Complaint
Subtype: Complaint Subject Minor (s)
Date Filed: 03/18/2010
Location: Department T
Cross-Reference Case Number: D427054

Case No. D-10-427054-D

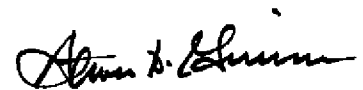
PARTY INFORMATION			Lead Attorneys
Defendant	Lewis, Wesley Allen 3150 S. Nellis BLVD Las Vegas, NV 89121	Male 6' 2", 175 lbs	Pro Se
Plaintiff	Lewis, Maria Daniela <i>Now Known As</i> Perdomo, Maria Daniela 4555 E Sahara Ave 217 Las Vegas, NV 89104	Female	Frances-Ann Fine, ESQ <i>Retained</i> 702-384-8900(W)
Subject Minor	Lewis, Isabella Sara	Female	

EVENTS & ORDERS OF THE COURT	
08/05/2014	All Pending Motions (1:30 PM) (Judicial Officer Nathan, Gayle)
Minutes	<p>08/05/2014 1:30 PM</p> <p>EVIDENTIARY HEARING - CUSTODY ORDER TO SHOW CAUSE: ORDER TO SHOW CAUSE (DAY 2) Testimony presented. Exhibits offered and admitted. (See worksheets). The Court advised Defendant he could not admit exhibits, which had not been disclosed during Discovery. Closing arguments. The COURT made its FINDINGS and ORDERED, the following: 1. Defendant's 7/18/14 Motion to Declare Item or Material Obscene and Obtain Injunction for Dismissal shall be STRICKEN as a FUGITIVE DOCUMENT. 2. In October, 2013 Defendant had child support arrearages amounting to \$9,012.38. The Court also ordered Defendant to pay half of the cost of the child's medical insurance, and made a finding he was not credible. The Court did not find Defendant to be credible when he testified he spent two hours with the child going over her homework. The Court also had concerns about him not charging the child's phone so Mom could have daily access to the child. The emails attached as an exhibit by Plaintiff confirmed she was unable to have daily contact with the minor child. The Court was also concerned at the 10/13/13 hearing the Defendant was not taking the child for her tutoring at Kumon, after school, and the Court FOUND Defendant to be in CONTEMPT for failing to take the minor child to her tutoring classes. In addition, the Court FOUND Defendant to be in CONTEMPT in October 2013, for his failure to pay his child support in June, July, August, and September of 2011, and January, May, June, July, August, September, October, and November, in 2012. Defendant is also in CONTEMPT for failing to pay his child support in October, November, December and January, in compliance with the Court's November order. In addition, Defendant is in CONTEMPT for not paying half of the tuition for Kumon, from November to July in the amount of \$1,000.00, and for failing to take the child to her tutoring classes during the summer. Therefore, the amounts set forth in the two Schedules of Arrearages (exhibits 17 and 18), which included child support arrearages in the amount of</p>

\$14,535.35, shall be REDUCED TO JUDGMENT. 3. Defendant shall be responsible for half of Mr. Wheatley's bill, in the amount of \$950.00, which shall be REDUCED TO JUDGMENT. 4. For failing to bring the minor child to tutoring on Mondays during his custodial time, the Court FINDS Defendant to be in CONTEMPT of Court, and he is SANCTIONED to twenty (20) days in the Clark County Detention Center, which shall be STAYED. 5. For each of the missed child support payments for December, January, and February Defendant is SANCTIONED to twenty (20) days in the Clark County Detention Center, totaling sixty (60) days, which shall be STAYED. 6. In the future, if Defendant fails to follow the Orders of the Court, and the matter comes back before the Court on an Order to Show Cause, the stayed jail time will be IMPOSED by the Court. 7. As to the timeshare, the Court FINDS based on Defendant's conduct over the past ten (10) months, it is in the best interest of the minor child for the Court to change the custodial arrangement; therefore, going forward Defendant's timeshare will be every other Friday from after school to Sunday at 5:00 p.m., when she will be picked up by Plaintiff. Defendant shall make sure the child is ready to leave with Plaintiff at 5:00 p.m. Defendant shall make sure all of the papers in the child's back pack remain in the back pack so Plaintiff has a chance to look at the papers when the child is returned. In addition, Defendant shall have dinner with the minor child on Mondays and Tuesdays every week from after school until 7:00 p.m., when Plaintiff will pick up the child from Defendant's residence. 8. The current holiday schedule shall remain AS IS. 9. Plaintiff shall have telephone contact with the minor child while she is with Defendant on weekends, and Defendant shall have telephone contact with the minor child every evening at 7:00 p.m., with the exception of Mondays and Tuesdays. 10. Based on 18% of his gross monthly income of \$1,998.00, Defendant's child support shall be SET at \$360.00 per month, effective August, 2014. 11. Medical insurance for the minor child shall be continued to be provided as per the Court's previous order. 12. Ms. Fine shall prepare the Order, which shall include findings.

Parties Present

Return to Register of Actions



CLERK OF THE COURT

ORD
The Fine & Price Law Group
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Ste 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10-4270 ⁵⁴ -D
Plaintiff,)	DEPT NO. T
)	
vs.)	DATE OF HEARING: 08/05/2014
)	TIME OF HEARING: 1:30 p.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

ORDER

THIS matter having come before the Court on the 5th day of August, 2014 for Evidentiary Hearing on custodial issues and the Order To Show Cause; Plaintiff, MARIA PERDOMO, appearing personally and through her counsel, FRANCES-ANN FINE, ESQUIRE, of The Fine & Price Law Group; Defendant, WESLEY ALLEN LEWIS, appearing in Proper Person; the Court having reviewed all papers and pleadings on file herein and having considered the arguments presented and good cause appearing,

/ / /

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

Page 1 of 5

RECEIVED

AUG 27 2014

FAMILY COURT
DEPARTMENT T

1 **IT IS HEREBY FOUND AND ORDERED** that Defendant's July 18,
2 2014 *Motion to Declare Item or Material Obscene and Obtain*
3 *Injunction for Dismissal* shall be stricken as a fugitive document.

4 **IT IS FURTHER FOUND** that in October, 2013, Defendant had
5 child support arrearages amounting to \$9,012.38. The Court also
6 ordered Defendant to pay half of the cost of the child's medical
7 insurance and made a finding that his testimony was not credible.
8 The Court did not find Defendant to be credible when he testified
9 he spent two hours with the child going over her homework. The
10 Court also had concerns about him not charging the child's phone so
11 that Mom could have daily access to the child. The e-mails attached
12 as an exhibit by Plaintiff confirmed she was unable to have daily
13 contact with the minor child. The Court was also concerned at the
14 October 13, 2013 hearing that the Defendant was not taking the
15 child for her tutoring at Kumon after school, and the Court found
16 Defendant to be in contempt for failing to take the minor child to
17 her tutoring classes.

18 **IT IS FURTHER FOUND AND ORDERED** that the Court found
19 Defendant to be in contempt in October of 2013 for his failure to
20 pay his child support in June, July, August, and September of 2011,
21 and January, May, June, July, August, September, October, and
22 November, in 2012. Defendant is also in contempt for failing to pay
23 his child support in October, November, December and January, in
24 compliance with the Court's November order. In addition, Defendant
25 is in contempt for not paying half of the tuition for Kumon, from
26 November to July, in the amount of \$1,000.00, and for failing to
27 take the child to her tutoring classes during the summer.
28 Therefore, the amounts set forth in the two Schedules of Arrearages

1 (Exhibits 17 and 18), which included child support arrearages in
2 the amount of \$14,535.35, shall be reduced to judgment against
3 Defendant, and in favor of Plaintiff, and are collectible by any
4 and all lawful means.

5 **IT IS FURTHER FOUND AND ORDERED** that Defendant shall be
6 responsible for half of Mr. Wheatley's bill, in the amount of
7 \$950.00, which shall be reduced to judgment and collectible by any
8 and all lawful means.

9 **IT IS FURTHER FOUND AND ORDERED** that Defendant is in
10 contempt of court for failing to bring the minor child to tutoring
11 on Mondays during his custodial time. Defendant is hereby
12 sanctioned to twenty (20) days in the Clark County Detention
13 Center, which shall be stayed.

14 **IT IS FURTHER FOUND AND ORDERED** that Defendant is in
15 contempt of court for each of the missed child support payments for
16 December, January, and February. Defendant is hereby sanctioned to
17 twenty (20) days in the Clark County Detention Center, totaling
18 sixty (60) days, which shall be stayed.

19 **IT IS FURTHER FOUND AND ORDERED** that in the future, if
20 Defendant fails to follow the Orders of the Court, and the matter
21 comes back before the Court on an Order to Show Cause, the above-
22 referenced stayed jail time will be imposed by the Court.

23 **IT IS FURTHER FOUND AND ORDERED** that as to the timeshare,
24 the Court finds, based on Defendant's conduct over the past ten
25 (10) months, that it is in the best interest of the minor child for
26 the Court to change the custodial arrangement. Therefore, going
27 forward, Defendant's timeshare will be every other Friday from
28 after school to Sunday at 5:00 p.m., when she will be picked up by

1 Plaintiff. Defendant shall make sure the child is ready to leave
2 with Plaintiff at 5:00 p.m. Defendant shall make sure all of the
3 papers in the child's back pack remain in the back pack so that
4 Plaintiff has a chance to look at the papers when the child is
5 returned. In addition, Defendant shall have dinner with the minor
6 child on Mondays and Tuesdays every week from after school until
7 7:00 p.m., when Plaintiff will pick up the child from Defendant's
8 residence. Defendant remains responsible for transporting the
9 minor child to her tutoring session each Monday and paying for
10 same. Should he fail to do so, the Monday visits will be
11 terminated.

12 **IT IS FURTHER FOUND AND ORDERED** that the current holiday
13 schedule shall remain status quo.

14 **IT IS HEREBY FOUND AND ORDERED** that Plaintiff shall have
15 telephone contact with the minor child while she is with Defendant
16 on weekends, and Defendant shall have telephone contact with the
17 minor child every evening at 7:00 p.m., with the exception of
18 Mondays and Tuesdays.

19 **IT IS HEREBY FOUND AND ORDERED** that based on 18% of his
20 gross monthly income of \$1,998.00 imputed to the Defendant, his
21 child support shall be set at \$360.00 per month, effective August,
22 2014.

23 / / /

24 / / /

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28 / / /

IT IS HEREBY FOUND AND ORDERED that medical insurance for the minor child shall continue to be provided as per the Court's previous order, to wit: Defendant provides the sum of \$50.00 per month as and for one-half of the minor child's health insurance.

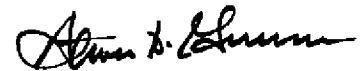
DATED this 29 day of Sept, 2014.

DISTRICT COURT JUDGE *RB*

GAYLE NATHAN

SUBMITTED BY:

~~The Fine & Price Law Group~~
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
Attorneys for Plaintiff
Maria Perdomo



CLERK OF THE COURT

1 NEOJ
2 THE FINE LAW GROUP
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 Attorney for Plaintiff
10 MARIA DANIELA LEWIS nka
11 MARIA DANIELA PERDOMO

7 DISTRICT COURT
8 CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka
10 MARIA DANIELA PERDOMO,

11 Plaintiff,

12 vs.

13 WESLEY ALLEN LEWIS,

14 Defendant.

)
)
) CASE NO. D-10-427054-D
) DEPT. NO. T

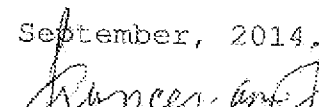
)
) DATE OF HEARING: 8/5/2014
) TIME OF HEARING: 1:30 p.m.

15 NOTICE OF ENTRY OF ORDER

16 TO: WESLEY ALLEN LEWIS, Defendant in Proper Person:

17 YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an
18 ORDER, a copy of which is attached hereto, was entered and filed in
19 the above-entitled matter on the 2nd day of September, 2014.

20 DATED the 2nd day of September, 2014.

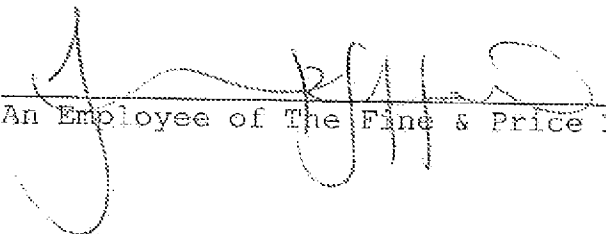
21 
22 The Fine & Price Law Group
23 FRANCES-ANN FINE, ESQUIRE
24 Nevada Bar No. 0025
25 8975 S. Pecos Road, Ste. 5
26 Henderson, Nevada 89074
27 Telephone: 702/384-8900
28 Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

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CERTIFICATE OF MAILING

I hereby certify that on this 2nd day of September, 2014, a copy of the foregoing NOTICE OF ENTRY OF ORDER was placed into the United States Mail, first class postage prepaid at Las Vegas, Nevada, addressed to:

Wesley Allen Lewis
4650 Idaho Avenue
Las Vegas, Nevada 89104


An Employee of The Fine & Price Law Group

FILED

Steph L. Lussier

CLERK OF THE COURT

1 ORD
2 The Fine & Price Law Group
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Ste. 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS nka
11 MARIA DANIELA PERDOMO,
12 Plaintiff,
13 vs.
14 WESLEY ALLEN LEWIS,
15 Defendant.

)
)
) CASE NO. D-10-4270⁵⁴-D
) DEPT NO. T
)
) DATE OF HEARING: 08/05/2014
) TIME OF HEARING: 1:30 p.m.
)
)
)

ORDER

18 THIS matter having come before the Court on the 5th day
19 of August, 2014 for Evidentiary Hearing on custodial issues and the
20 Order To Show Cause; Plaintiff, MARIA PERDOMO, appearing personally
21 and through her counsel, FRANCES-ANN FINE, ESQUIRE, of The Fine &
22 Price Law Group; Defendant, WESLEY ALLEN LEWIS, appearing in
23 Proper Person; the Court having reviewed all papers and pleadings
24 on file herein and having considered the arguments presented and
25 good cause appearing,

26 / / /

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

RECEIVED

AUG 27 2014

FAMILY COURT
DEPARTMENT T

1 IT IS HEREBY FOUND AND ORDERED that Defendant's July 18,
2 2014 Motion to Declare Item or Material Obscene and Obtain
3 Injunction for Dismissal shall be stricken as a fugitive document.

4 IT IS FURTHER FOUND that in October, 2013, Defendant had
5 child support arrearages amounting to \$9,012.38. The Court also
6 ordered Defendant to pay half of the cost of the child's medical
7 insurance and made a finding that his testimony was not credible.
8 The Court did not find Defendant to be credible when he testified
9 he spent two hours with the child going over her homework. The
10 Court also had concerns about him not charging the child's phone so
11 that Mom could have daily access to the child. The e-mails attached
12 as an exhibit by Plaintiff confirmed she was unable to have daily
13 contact with the minor child. The Court was also concerned at the
14 October 13, 2013 hearing that the Defendant was not taking the
15 child for her tutoring at Kumon after school, and the Court found
16 Defendant to be in contempt for failing to take the minor child to
17 her tutoring classes.

18 IT IS FURTHER FOUND AND ORDERED that the Court found
19 Defendant to be in contempt in October of 2013 for his failure to
20 pay his child support in June, July, August, and September of 2011,
21 and January, May, June, July, August, September, October, and
22 November, in 2012. Defendant is also in contempt for failing to pay
23 his child support in October, November, December and January, in
24 compliance with the Court's November order. In addition, Defendant
25 is in contempt for not paying half of the tuition for Kumon, from
26 November to July, in the amount of \$1,000.00, and for failing to
27 take the child to her tutoring classes during the summer.
28 Therefore, the amounts set forth in the two Schedules of Arrearages

1 (Exhibits 17 and 18), which included child support arrearages in
2 the amount of \$14,535.35, shall be reduced to judgment against
3 Defendant, and in favor of Plaintiff, and are collectible by any
4 and all lawful means.

5 **IT IS FURTHER FOUND AND ORDERED** that Defendant shall be
6 responsible for half of Mr. Wheatley's bill, in the amount of
7 \$950.00, which shall be reduced to judgment and collectible by any
8 and all lawful means.

9 **IT IS FURTHER FOUND AND ORDERED** that Defendant is in
10 contempt of court for failing to bring the minor child to tutoring
11 on Mondays during his custodial time. Defendant is hereby
12 sanctioned to twenty (20) days in the Clark County Detention
13 Center, which shall be stayed.

14 **IT IS FURTHER FOUND AND ORDERED** that Defendant is in
15 contempt of court for each of the missed child support payments for
16 December, January, and February. Defendant is hereby sanctioned to
17 twenty (20) days in the Clark County Detention Center, totaling
18 sixty (60) days, which shall be stayed.

19 **IT IS FURTHER FOUND AND ORDERED** that in the future, if
20 Defendant fails to follow the Orders of the Court, and the matter
21 comes back before the Court on an Order to Show Cause, the above-
22 referenced stayed jail time will be imposed by the Court.

23 **IT IS FURTHER FOUND AND ORDERED** that as to the timeshare,
24 the Court finds, based on Defendant's conduct over the past ten
25 (10) months, that it is in the best interest of the minor child for
26 the Court to change the custodial arrangement. Therefore, going
27 forward, Defendant's timeshare will be every other Friday from
28 after school to Sunday at 5:00 p.m., when she will be picked up by

1 Plaintiff. Defendant shall make sure the child is ready to leave
2 with Plaintiff at 5:00 p.m. Defendant shall make sure all of the
3 papers in the child's back pack remain in the back pack so that
4 Plaintiff has a chance to look at the papers when the child is
5 returned. In addition, Defendant shall have dinner with the minor
6 child on Mondays and Tuesdays every week from after school until
7 7:00 p.m., when Plaintiff will pick up the child from Defendant's
8 residence. Defendant remains responsible for transporting the
9 minor child to her tutoring session each Monday and paying for
10 same. Should he fail to do so, the Monday visits will be
11 terminated.

12 **IT IS FURTHER FOUND AND ORDERED** that the current holiday
13 schedule shall remain status quo.

14 **IT IS HEREBY FOUND AND ORDERED** that Plaintiff shall have
15 telephone contact with the minor child while she is with Defendant
16 on weekends, and Defendant shall have telephone contact with the
17 minor child every evening at 7:00 p.m., with the exception of
18 Mondays and Tuesdays.

19 **IT IS HEREBY FOUND AND ORDERED** that based on 18% of his
20 gross monthly income of \$1,998.00 imputed to the Defendant, his
21 child support shall be set at \$360.00 per month, effective August,
22 2014.

23 / / /

24 / / /

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1 IT IS HEREBY FOUND AND ORDERED that medical insurance for
2 the minor child shall continue to be provided as per the Court's
3 previous order, to wit: Defendant provides the sum of \$50.00 per
4 month as and for one-half of the minor child's health insurance.

5 DATED this 24 day of Sept, 2014.

6
7
8 DISTRICT COURT JUDGE JB
9 GAYLE NATHAN

8 SUBMITTED BY:

9 *Frances Ann Fine*
10 The Fine & Price Law Group
11 FRANCES-ANN FINE, ESQUIRE
12 Nevada Bar No. 0025
13 Attorneys for Plaintiff
14 Maria Perdomo


CLERK OF THE COURT

COM
THE FINE & PRICE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT
CLARK COUNTY, NEVADA

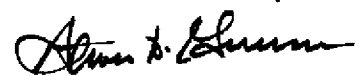
MARIA DANIELA LEWIS nka)
MARIA DANIELA PERDOMO,)
Plaintiff,) CASE NO. D-10-427054-D
vs.) DEPT. NO. T
WESLEY ALLEN LEWIS,)
Defendant.)

CERTIFICATE OF MAILING

I hereby certify that on 2nd day of September, 2014,
service of EX PARTE REQUEST FOR CLARIFICATION AND/OR INSTRUCTIONS
was made by placing a copy of same into the United States Mail,
first class postage prepaid, at Las Vegas, Nevada, addressed to:

Wesley Lewis
4650 Idaho Avenue
Las Vegas, Nevada 89104


An Employee of The Fine & Price Law Group



CLERK OF THE COURT

1 ORD
2 The Fine & Price Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Ste 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@finepricelaw.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS nka)
11 MARIA DANIELA PERDOMO,)
12 Plaintiff,) CASE NO. D-10-427054-D
13 vs.) DEPT NO. T
14 WESLEY ALLEN LEWIS,)
15 Defendant.)
16)
17)

SUPPLEMENTAL ORDER

18 THIS matter having come before the Court on Plaintiff's
19 Ex Parte Request For Clarification And/Or Instructions filed on
20 August 26, 2014; the Court having reviewed all papers and pleadings
21 on file herein, and having issued Court Minutes on August 28, 2014,
22 and good cause appearing,

23 IT IS HEREBY FOUND that at an Evidentiary Hearing
24 conducted on August 5, 2014 this Court ordered that Defendant's
25 visitation with the parties' minor child would include a dinner
26 date with the child on Mondays and Tuesdays every week, from after
27 school until 7:00 p.m.

RECEIVED

SEP 02 2014

1 **IT IS HEREBY ORDERED** that in the event the parties' minor
2 child has an extra-curricular activity scheduled during Defendant's
3 visitation on Monday and Tuesday evenings, he shall be responsible
4 for transporting the minor child to and from the scheduled
5 activity.

6 **IT IS FURTHER FOUND** that the parties' minor child's
7 tutoring classes at Kumon were discussed at the August 5, 2014
8 Evidentiary Hearing, and Defendant was found to be in contempt for
9 failing to take the minor child to Kumon for her tutoring classes
10 and for failing to pay his share of the tuition fees.

11 **IT IS FURTHER FOUND** that the parties' minor child is
12 still scheduled to attend tutoring classes at Kumon after school on
13 Mondays.

14 **IT IS FURTHER ORDERED** that it is Defendant's
15 responsibility to make sure that the parties' minor child gets to
16 her tutoring classes and to any other scheduled after school
17 activity during his timeshare. If Defendant fails to take the
18 minor child to her tutoring classes at Kumon, or to any other
19 scheduled after school activity which occurs during his visitation
20 time, his Monday visitation with the minor child shall be vacated.

21 **IT IS FURTHER ORDERED** that Defendant shall continue to be
22 responsible for one-half the cost of the parties' minor child's
23 tutoring. Defendant shall pay for Monday's tutoring sessions when
24 he brings the minor child to same.

25 **IT IS FURTHER ORDERED** that the parties' minor child's
26 tutoring shall continue until Kumon finds that the minor child is
27 testing at grade level.

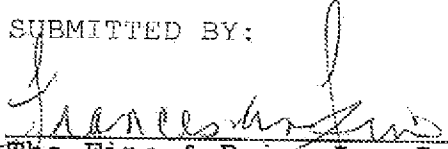
28

1 IT IS HEREBY FOUND AND ORDERED that Plaintiff's Ex Parte
2 Request For Clarification And/Or Instructions filed on August 26,
3 2014 has been resolved with the issuance of the Court's Minute
4 Order on August 28, 2014 and the instant Order.

5 DATED this 31st day of Sept, 2014.

6
7
8 DISTRICT COURT JUDGE 18
GAYLE NATHAN

9 SUBMITTED BY:

10 
11 The Fine & Price Law Group
12 FRANCES-ANN FINE, ESQ.
13 Nevada Bar No. 0025
Attorneys for Plaintiff
14 MARIA PERDOMO
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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Case No. D-10-427054-D
Dept No. T

WESLEY ALLEN LEWIS,
Defendant,

I hereby certify that on 8 day of Sept, 2014, I deposited for mailing a true and correct copy of the Notice of Appeal and Request for Authorization to Proceed in Proper Person; Waiver of Appeal Bond; and to Transmit Entire Record on File in the United States Post Office, First Class Mail, postage prepaid thereon, addressed to:

Neely, J. C.
PERSON MAILING

1 WESLEY ALLEN LEWIS
2 4650 Idaho Ave.
3 Las Vegas, NV 89104
(702) 432-3996
Defendant in Proper Person

Case No. D-10-427054-D
Dept No. T

VS.

WESLEY ALLEN LEWIS,
Defendant,

COMES NOW, Defendant, in Proper Person and gives notice that Defendant intends to file an Appeal in Case D-10-427054-D, Dept T, Eighth Judicial District Court, Clark County, Nevada.

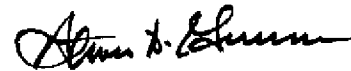
Defendant requests waiver of appeal bond in this matter, and to proceed in Proper Person.

This appeal is specifically related to the Order modifying shared custody and imputing income, filed on September 2, 2014. The trial was more of an AMBUSH by opposing counsel AND the court, than a trial.

Defendant believes the court made improper rulings with respect to child custody and support.

Dated this 8 day of Sept, 2014.

WESLEY ALLEN LEWIS
Defendant in Proper Person



CLERK OF THE COURT

WESLEY ALLEN LEWIS
4650 Idaho Ave.
Las Vegas, NV 89104
(702) 432-3996
Defendant in Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

MARIA DANIELA LEWIS,
aka MARIA DANIELA PERDOMO
Plaintiff,

vs.

WESLEY ALLEN LEWIS,
Defendant,

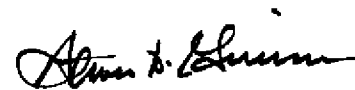
Case No. D-10-427054-D
Dept No. T

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

COMES NOW, Defendant WESLEY ALLEN LEWIS, and requests authorization of the court to proceed in Proper Person, and that the court submit the entire record on file. ~~Defendant~~ Plaintiff also requests the court waive the bond in this matter, as this is a matter of custody.

Dated this 8 day of Sept, 2014.


WESLEY ALLEN LEWIS
Plaintiff in Proper Person



CLERK OF THE COURT

ASTA

**IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE
STATE OF NEVADA IN AND FOR
THE COUNTY OF CLARK**

MARIA DANIELA LEWIS nka MARIA
DANIELA PERDOMO,

Plaintiff(s),

vs.

WESLEY ALLEN LEWIS,

Defendant(s),

Case No: D-10-427054-D
Dept No: T

CASE APPEAL STATEMENT

1. Appellant(s): Wesley Lewis

2. Judge: Gayle Nathan

3. Appellant(s): Wesley Lewis

Counsel:

Wesley Lewis
4650 Idaho Ave.
Las Vegas, NV 89104

4. Respondent (s): Maria Daniela Lewis nka Maria Daniela Perdomo

Counsel:

Frances-Ann Fine, Esq.
8975 S. Pecos Road, Ste. 5
Henderson, NV 89074

1 5. Appellant(s)'s Attorney Licensed in Nevada: N/A

2 Permission Granted: N/A

3 Respondent(s)'s Attorney Licensed in Nevada: Yes

4 Permission Granted: N/A

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

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

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

8 ***Expires 1 year from date filed*

9 Appellant Filed Application to Proceed in Forma Pauperis: Yes, September 9, 2014

10 9. Date Commenced in District Court: March 18, 2010

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

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

13 11. Previous Appeal: No

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

15 12. Child Custody or Visitation: Custody

16 13. Possibility of Settlement: Unknown

17 Dated This 11 day of September 2014.

18 Steven D. Grierson, Clerk of the Court

19 

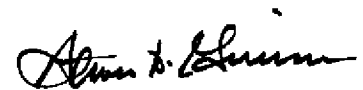
20 Teodora Jones, Deputy Clerk

21 200 Lewis Ave

22 PO Box 551601

23 Las Vegas, Nevada 89155-1601

24 (702) 671-0512



CLERK OF THE COURT

1 NEOJ
2 THE FINE LAW GROUP
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 Attorney for Plaintiff
10 MARIA DANIELA LEWIS nka
11 MARIA DANIELA PERDOMO

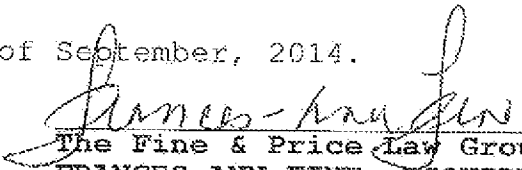
DISTRICT COURT
CLARK COUNTY, NEVADA

12 MARIA DANIELA LEWIS nka)
13 MARIA DANIELA PERDOMO,)
14) CASE NO. D-10-427054-D
15 Plaintiff,) DEPT. NO. T
16)
17 vs.) DATE OF HEARING: 8/05/2014
18) TIME OF HEARING: 1:30 p.m.
19 WESLEY ALLEN LEWIS,)
20)
21 Defendant.)
22)

NOTICE OF ENTRY OF SUPPLEMENTAL ORDER

23 TO: WESLEY ALLEN LEWIS, Defendant in Proper Person:
24 YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an
25 Supplemental Order, a copy of which is attached hereto, was entered
26 and filed in the above-entitled matter on the 4th day of September,
27 2014.

28 DATED the 12 day of September, 2014.

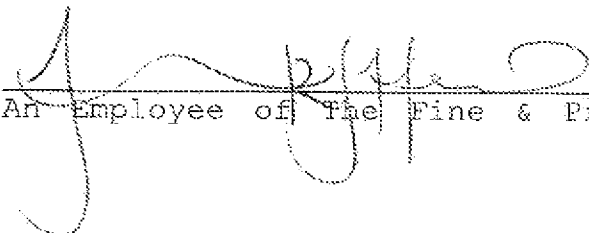


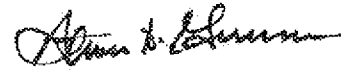
The Fine & Price Law Group
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 S. Pecos Road, Ste. 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

CERTIFICATE OF MAILING

I hereby certify that on this 15th day of September, 2014, a copy of the foregoing Notice of Entry of Supplemental Order was placed into the United States Mail, first class postage prepaid at Las Vegas, Nevada, addressed to:

Wesley Allen Lewis
4650 Idaho Avenue
Las Vegas, Nevada 89104


An Employee of The Fine & Price Law Group



CLERK OF THE COURT

ORD
The Fine & Price Law Group
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
8975 South Pecos Road, Ste 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@finepricelaw.com
Attorney for Plaintiff
MARIA DANIELA LEWIS aka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS aka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT NO. T
vs.)	
)	DATE OF HEARING: 08/05/2014
WESLEY ALLEN LEWIS,)	TIME OF HEARING: 1:30 p.m.
)	
Defendant.)	

SUPPLEMENTAL ORDER

THIS matter having come before the Court on Plaintiff's
Ex Parte Request For Clarification And/Or Instructions filed on
August 26, 2014; the Court having reviewed all papers and pleadings
on file herein, and having issued Court Minutes on August 28, 2014,
and good cause appearing,

IT IS HEREBY FOUND that at an Evidentiary Hearing
conducted on August 5, 2014 this Court ordered that Defendant's
visitation with the parties' minor child would include a dinner
date with the child on Mondays and Tuesdays every week, from after
school until 7:00 p.m.

RECEIVED

SEP 02 2014

FAMILY COURT
DEPARTMENT T

1 IT IS HEREBY ORDERED that in the event the parties' minor
2 child has an extra-curricular activity scheduled during Defendant's
3 visitation on Monday and Tuesday evenings, he shall be responsible
4 for transporting the minor child to and from the scheduled
5 activity.

6 IT IS FURTHER FOUND that the parties' minor child's
7 tutoring classes at Kumon were discussed at the August 5, 2014
8 Evidentiary Hearing, and Defendant was found to be in contempt for
9 failing to take the minor child to Kumon for her tutoring classes
10 and for failing to pay his share of the tuition fees.

11 IT IS FURTHER FOUND that the parties' minor child is
12 still scheduled to attend tutoring classes at Kumon after school on
13 Mondays.

14 IT IS FURTHER ORDERED that it is Defendant's
15 responsibility to make sure that the parties' minor child gets to
16 her tutoring classes and to any other scheduled after school
17 activity during his timeshare. If Defendant fails to take the
18 minor child to her tutoring classes at Kumon, or to any other
19 scheduled after school activity which occurs during his visitation
20 time, his Monday visitation with the minor child shall be vacated.

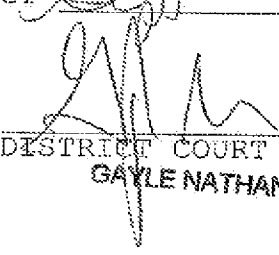
21 IT IS FURTHER ORDERED that Defendant shall continue to be
22 responsible for one-half the cost of the parties' minor child's
23 tutoring. Defendant shall pay for Monday's tutoring sessions when
24 he brings the minor child to same.

25 IT IS FURTHER ORDERED that the parties' minor child's
26 tutoring shall continue until Kumon finds that the minor child is
27 testing at grade level.

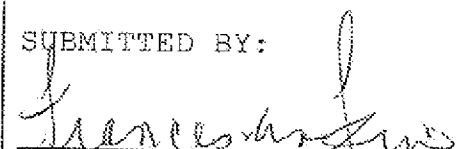
28

1 IT IS HEREBY FOUND AND ORDERED that Plaintiff's Ex Parte
2 Request For Clarification And/Or Instructions filed on August 26,
3 2014 has been resolved with the issuance of the Court's Minute
4 Order on August 28, 2014 and the instant Order.

5 DATED this 3rd day of Sept, 2014.

6
7
8 
DISTRICT COURT JUDGE
GAYLE NATHAN

9 SUBMITTED BY:

10 
11 The Fine & Price Law Group
FRANCES-ANN FINE, ESQ.
12 Nevada Bar No. 0025
Attorneys for Plaintiff
13 MARIA PERDOMO
14
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16
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**DISTRICT COURT
CLARK COUNTY, NEVADA**

PERSON MAILING


CLERK OF THE COURT

1 WESLEY ALLEN LEWIS
2 4650 Idaho Ave.
3 Las Vegas, NV 89104
4 (702) 432-3996
5 Defendant in Proper Person

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

8 MARIA DANIELA LEWIS,
9 aka MARIA DANIELA PERDOMO
10 Plaintiff,

) Case No. D-10-427054-D
) Dept No. T
)

11 vs.

12 WESLEY ALLEN LEWIS,
13 Defendant,

14 **AMENDED NOTICE OF APPEAL**

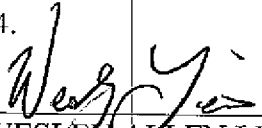
15 COMES NOW, Defendant, in Proper Person and gives notice that Defendant intends to
16 file an Appeal in Case D-10-427054-D, Dept T, Eighth Judicial District Court, Clark County,
17 Nevada.

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

19 This appeal is specifically related to the Order modifying shared custody and imputing
20 income, filed on September 2, 2014. The trial was more of an AMBUSH by opposing counsel
21 AND the court, than a trial. This appeal is amended to include an EX PARTE ORDER entitled
22 "SUPPLEMENTAL ORDER" filed 9/4/14, which requires Defendant to transport the child for
23 extracurricular activities. This modifies the prior order unilaterally, and again shows ambush.
24
25
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1 Defendant believes the court made improper rulings with respect to child custody and
2 support; and issues relating to the child's KUMON schooling, which Defendant could not afford,
3 and extracurricular activities.
4

5 Dated this 19 day of September 2014.

6 
7 _____
8 WESLEY ALLEN LEWIS
9 Defendant in Proper Person
10
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EOT

ORIGINAL

FILED

OCT 20 2014 *sq*

Sherry Justice
CLERK OF COURT

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS,) CASE NO. D-10-427054-D
) DEPT. T
Plaintiff,)
)
vs.)
)
WESLEY ALLEN LEWIS,)
)
Defendant.) ESTIMATED COST of
APPEAL TRANSCRIPTS

The office of Transcript Video Services received a request for transcript estimates, for the purpose of appeal, from Wesley Lewis on October 20, 2014, for the following proceedings in the above-captioned case:

JULY 29, 2014; AUGUST 05, 2014
for original transcript and one copy of each.

The estimated cost of the transcripts is \$1160.00.

Payment in the amount of **\$1160.00**, payable to **Verbatim Reporting & Transcription**, must be presented to the Transcript Video Services Office, 601 North Pecos Road, Las Vegas, Nevada, 89101, prior to work commencing on the transcripts. Payment must be in the form of **cashier's check or money order**.

There being no telephone number provided, this estimate is being sent to Wesley Lewis via US Postal Service.

DATED this 20th day of October, 2014.

Sherry Justice
SHERRY JUSTICE
Transcript Video Services

Transcript ESTIMATE amount of \$ _____ paid on
date of _____ Cash _____ Check # _____

This is only an **estimate**. Upon completion of transcript(s), a balance may be due, or you may receive a refund of your deposit if overpayment is greater than \$15.00.

NOTE: STATUTORY FEES ARE SUBJECT TO CHANGE PER LEGISLATIVE SESSION.

ITEMS LEFT BEYOND NINETY DAYS ARE SUBJECT TO DISPOSAL WITHOUT REFUND.

COUNTY RETENTION POLICY APPROVED BY INTERNAL AUDIT.


CLERK OF THE COURT

WESLEY ALLEN LEWIS
4650 Idaho Ave.
Las Vegas, NV 89104
(702) 432-3996
Defendant in Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

MARIA DANIELA LEWIS,
aka MARIA DANIELA PERDOMO
Plaintiff,

vs.

WESLEY ALLEN LEWIS,
Defendant,

) Case No. D-10-427054-D
) Dept No. T
)
)
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EX PARTE MOTION FOR LEAVE FOR WAIVER OF TRANSCRIPT COSTS

COMES NOW, WESLEY LEWIS, Defendant, in Proper Person, and moves this court for an Order permitting the applicant to obtain transcripts that are necessary in support of his appeal in the Nevada Supreme Court without cost. This pertains to the above case, and transcripts for the following: 7/29/14 and 8/5/14. There is no way the Supreme Court can see the extend the District Court Judge involved itself without a transcript of these hearings, and the cost is \$1,100. Defendant's monthly income is approximately \$1,100 per month at this time.

This Motion is based upon the grounds that Defendant is unable to afford the costs of the necessary transcripts in this case, and that he is, nonetheless, entitled to redress.

This application is made and based upon Points and Authorities below and all of the pleadings and papers on file herein.

POINTS AND AUTHORITIES

In pertinent part, NRAP section 24 states as follows:

(a) Leave to proceed on appeal in forma pauperis from district court to Supreme Court. A party to an action in a district court who desires to proceed on appeal in forma pauperis shall file in the district court a motion for leave to so proceed, together with an affidavit showing, in the detail prescribed by Form 4 of the Appendix of Forms, his inability to pay fees and costs or to give security therefor, his belief that he is entitled to redress, and a statement of the issues which he intends to present on appeal...If the motion is denied, the District Court shall state in writing the reasons for the denial...If a motion for leave to proceed on appeal

1 in forma pauperis is denied by the District Court, or if the District Court shall certify that the
2 appeal is not taken in good faith, or shall find that the party is otherwise not entitled to
3 proceed in forma pauperis, the clerk shall forthwith serve notice of such action.
4 In the event this court denied this motion, which is presented in good faith, this court must

5 pursuant to NRAP 24(a), state in writing the reasons for the denial, and the clerk must forthwith
6 serve notice of such action.

7 DATED this 10 day of NOV, 2014.

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9 _____
10 WESLEY LEWIS
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IN THE SUPREME COURT OF THE STATE OF NEVADA

WESLEY ALLEN LEWIS,
Appellant(s),

vs.

MARIA DANIELA LEWIS A/K/A MARIA
DANIELA PERDOMO,
Respondent(s),

Case No: D427054

Docket No: 66497

RECORD ON APPEAL VOLUME 3

ATTORNEY FOR APPELLANT
WESLEY LEWIS, PROPER PERSON
4650 IDAHO AVE.
LAS VEGAS, NV 89104

ATTORNEY FOR RESPONDENT
FRANCES-ANN FINE, ESQ.
8975 S. PECOS ROAD, STE. 5
HENDERSON, NV 89074

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
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**D-10-427054-D Maria Daniela Lewis, Plaintiff
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**D-10-427054-D Maria Daniela Lewis, Plaintiff
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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

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KUMON

Name Isabella Lewis

Registration Fee _____ \$ _____

Monthly Tuition _____ \$ 200

TUITION FOR YEAR

Mom JANUARY 2014

Date Received 1/22

☐ Cash ☐ Check # _____

Amount Paid: \$ 200

Balance Due: \$ 0.00

Mom FEBRUARY 2014

Date Received 1/29

☐ Cash ☐ Check # _____

Amount Paid: \$ 200

Balance Due: \$ 0.00

MARCH

Date Received _____

☐ Cash ☐ Check # _____

Amount Paid: \$ _____

Balance Due: \$ _____

APRIL

Date Received _____

☐ Cash ☐ Check # _____

Amount Paid: \$ _____

Balance Due: \$ _____

MAY

Date Received _____

☐ Cash ☐ Check # _____

Amount Paid: \$ _____

Balance Due: \$ _____

JUNE

Date Received _____

☐ Cash ☐ Check # _____

Amount Paid: \$ _____

Balance Due: \$ _____

JULY

Date Received _____

☐ Cash ☐ Check # _____

Amount Paid: \$ _____

Balance Due: \$ _____

AUGUST

Date Received _____

☐ Cash ☐ Check # _____

Amount Paid: \$ _____

Balance Due: \$ _____

SEPTEMBER

Date Received _____

☐ Cash ☐ Check # _____

Amount Paid: \$ _____

Balance Due: \$ _____

OCTOBER

Date Received _____

☐ Cash ☐ Check # _____

Amount Paid: \$ _____

Balance Due: \$ _____

NOVEMBER

Date Received _____

☐ Cash ☐ Check # _____

Amount Paid: \$ _____

Balance Due: \$ _____

DECEMBER

Date Received _____

☐ Cash ☐ Check # _____

Amount Paid: \$ _____

Balance Due: \$ _____

1. Registration fee due at time of enrollment.
2. Enrollment fee required if student is absent over 2 months.
3. Tuition fee is due in advance by the end of each month.

Please make check payable to: _____

Mom's credit card is used
for auto pay every month. Amen

Exhibit “3”



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's Progress in Kumon's

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Fri, Jan 17, 2014 at 12:34 AM

To: Wesley Allen Lewis 7023401221 <Info4WLewis@yahoo.com>

Cc: Maria Daniela Perdomo 7028852853 <perdomoMDA@gmail.com>

Wesley,

I am concern about Isabella's math progress in the kumon's program. She does not seem to be able to advance in addition.

I have talked to Scott about this matter, and he pointed out the importance of consistency during this part of her learning process, as well as the relevance of math for her future. We both need to cooperate with Isabella's homework in order for her to advance.

There have been a few weeks now, since I have been noticing that Isabella is not completing her homework during parenting time. As Scott pointed out, this is extremely important for her. So please, in your daughter's best interest, commit yourself to help her complete Kumons homework. Be sure it is turned in every Monday when you drop her off.

Regards,

MariaDaniela Perdomo

Sent from my iPhone

Exhibit “4”

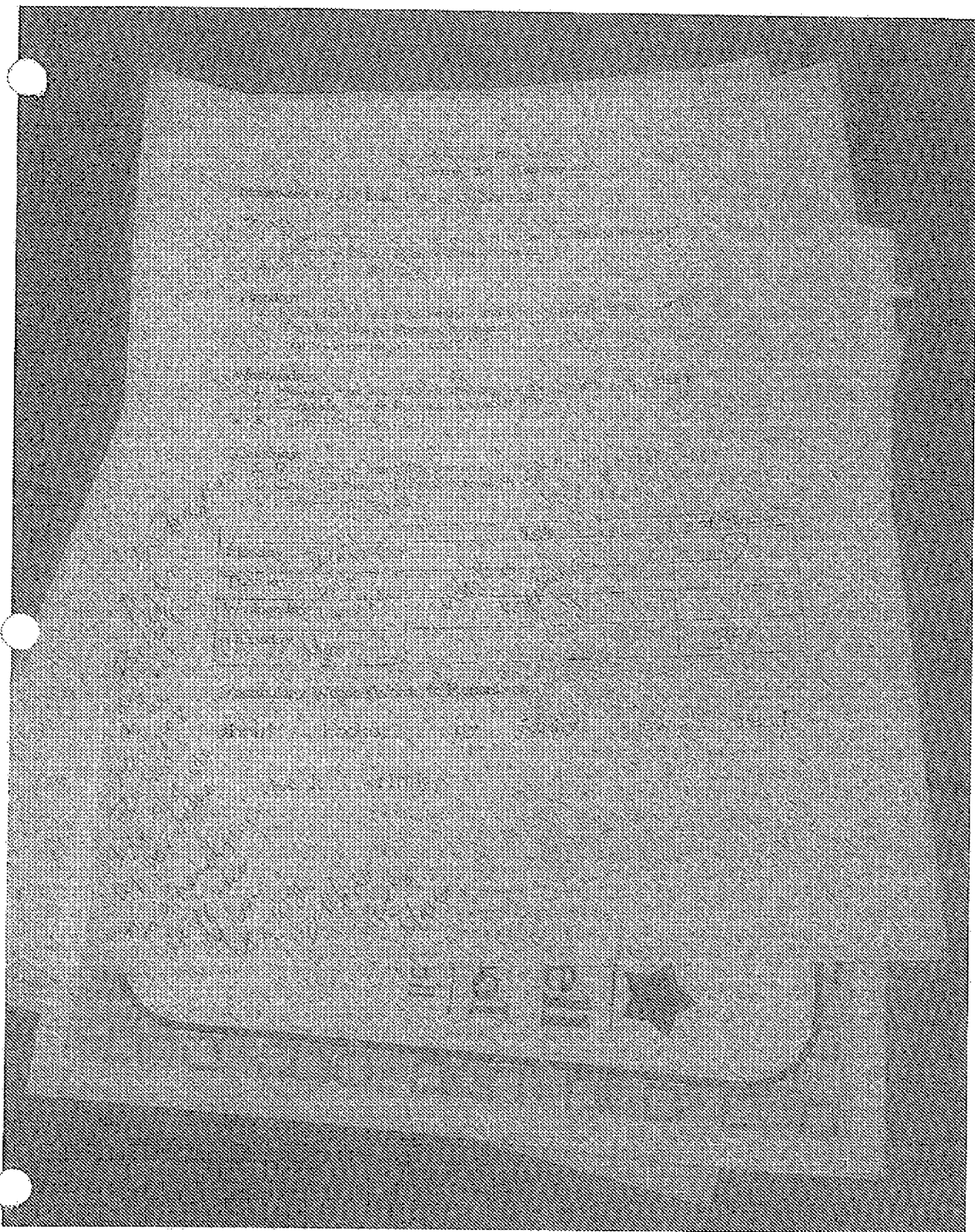


Exhibit “5”

	Trimester 1	Trimester 2	Trimester 3	Final
Reading	A 97%	B 88%		
Writing	A 94%	A 94%		
Language	A 95%	B 87%		
Speaking and Listening	A 93%	A 93%		
Mathematics	A 90%	B 84%		
Science/Health	A 100%	A 95%		
Social Studies	A 99%	A 86%		
Special/Subject				
Art	Satisfactory progress	Satisfactory progress		
Humanities	Satisfactory progress	Exceptional progress		
Library	Exceptional progress	Exceptional progress		
Music	Exceptional progress	Exceptional progress		
PE	Exceptional progress	Exceptional progress		
Successful Learner Behaviors				
Observes School Rules	Exceptional progress	Exceptional progress		
Follows Classroom Rules	Exceptional progress	Satisfactory progress		
Follows Directions	Satisfactory progress	Satisfactory progress		
Accepts Responsibility	Satisfactory progress	Satisfactory progress		
Works Independently	Exceptional progress	Exceptional progress		
Works Cooperatively	Exceptional progress	Exceptional progress		
Completes and Returns Homework on Time	Satisfactory progress	Satisfactory progress		
Quality of Work	Exceptional progress	Exceptional progress		
Attendance Record:				
Days Absent	2	5		
Times Tardy	6	8		
Days Present	63	53		

**Learner
Progress
Scales**

Knowledge of Work - Overall summary grade for content area.
A- 90-100% mastery of grade level standard
B- 80-89% mastery of grade level standard
C- 70-79% mastery of grade level standard
D- 60-69% mastery of grade level standard
F- Below 60% mastery of grade level standard
W- Working on standards below grade level (see attachment)

Special Subjects and
Learner Behaviors
Exceptional progress
Satisfactory progress
Needs improvement

Teacher Comments - 1st Trimester

Isabella scored 53 wpm on the AIMSweb assessment, which is above-grade level. In order to challenge her, she is currently reading beginner chapter books with her reading group. We have discussions about the plot, characters, and setting and she is able to contribute to the group. She enjoys reading to the class and picks out wonderful books we like to hear. Occasionally, Isabella needs reminders to complete unfinished school work or centers in her desk folder. She can work on being more responsible by completing this in a more timely manner and without being told. Isabella is a kind, polite girl who consistently follows directions and classroom rules. She is also a straight-A student.

Teacher Comments - 2nd Trimester

This trimester, Isabella scored 112 wpm on the AIMSweb assessment, which is well-above grade level. Her reading group continues to read beginner chapter books and has discussions about what was read. She continues to show enthusiasm with reading to the class. Lately, Isabella has had a difficult time answering questions during Saxon Phonics and can be easily distracted. Many times throughout the day, I will catch her looking from behind, while she is supposed to be completing assignments at her desk. She requires more time to complete seat work compared to others and needs redirection. Isabella takes pride in her writing and completes amazing illustrations. She shows a lot of passion with art. She lights up and is excited to share her accomplishments with classmates. Isabella is an A-B Honor Roll student.

Teacher Comments - 3rd Trimester

Teacher's Signature

	Trimester 1	Trimester 2	Trimester 3	Final
Reading	A 97%			
Writing	A 94%			
Language	A 95%			
Speaking and Listening	A 93%			
Mathematics	A 90%			
Science/Health	A 100%			
Social Studies	A 90%			
Special Subject				
Art	Satisfactory progress			
Humanities	Satisfactory progress			
Library	Exceptional progress			
Music	Exceptional progress			
PE	Exceptional progress			
Successful Learner Behaviors:				
Observes School Rules	Exceptional progress			
Follows Classroom Rules	Exceptional progress			
Follows Directions	Satisfactory progress			
Accepts Responsibility	Satisfactory progress			
Works Independently	Exceptional progress			
Works Cooperatively	Exceptional progress			
Completes and Returns Homework on Time	Satisfactory progress			
Quality of Work	Exceptional progress			
Attendance Record:				
Days Absent	2			
Times Tardy	6			
Days Present	63			

**Learner
Progress
Scales**

Knowledge of Work - Overall summary grade for content area.
A- 90-100% mastery of grade level standard
B- 80-89% mastery of grade level standard
C- 70-79% mastery of grade level standard
D- 60-69% mastery of grade level standard
F- Below 60% mastery of grade level standard
W- Working on standards below grade level (see attachment)

Special Subjects and
Learner Behaviors
Exceptional progress
Satisfactory progress
Needs improvement

Lewis - Report Card

Teacher Comments - 1st Trimester

Isabella scored 53 wpm on the AIMSweb assessment, which is above-grade level. In order to challenge her, she is currently reading beginner chapter books with her reading group. We have discussions about the plot, characters, and setting and she is able to contribute to the group. She enjoys reading to the class and picks out wonderful books we like to hear. Occasionally, Isabella needs reminders to complete unfinished school work or centers in her desk folder. She can work on being more responsible by completing this in a more timely manner and without being told. Isabella is a kind, polite girl who consistently follows directions and classroom rules. She is also a straight-A student.

Teacher Comments - 2nd Trimester

Teacher Comments - 3rd Trimester

Teacher's Signature

Mom's

STUDENT PROGRESS REPORT
Monday, November 25, 2013

Lewis, Isabella

Ms. Burgess
Twitchell Elementary School

Grade Summary	Overall
Language	1235/1300 = 95% A
• Category: NA	1235/1300 = 95% A
Mathematics	1806.43/2000 = 90% A
• Category: NA	1806.43/2000 = 90% A
Reading	2606.33/2700 = 97% A
• Category: NA	2606.33/2700 = 97% A
Science/Health	750/750 = 100% A
• Category: NA	750/750 = 100% A
Social Studies	1190/1200 = 99% A
• Category: NA	1190/1200 = 99% A
Speaking and Listening	380/400 = 95% A
• Category: NA	380/400 = 95% A
Writing	1220/1300 = 94% A
• Category: NA	1220/1300 = 94% A

Follows classroom rules	<input checked="" type="radio"/> E	<input type="radio"/> S	<input type="radio"/> N
Follows directions	<input checked="" type="radio"/> E	<input type="radio"/> S	<input type="radio"/> N
Accepts responsibility	<input type="radio"/> E	<input checked="" type="radio"/> S	<input type="radio"/> N
Works independently	<input checked="" type="radio"/> E	<input type="radio"/> S	<input type="radio"/> N
Quality of work	<input checked="" type="radio"/> E	<input type="radio"/> S	<input type="radio"/> N

Mom's

STUDENT PROGRESS REPORT

Friday, December 20, 2013

Lewis, Isabella

Ms. Burgess

Twitchell Elementary School

Grade Summary	Overall
Language	200/200 = 100% A
• Category: NA	200/200 = 100% A
Mathematics	100/100 = 100% A
• Category: NA	100/100 = 100% A
Reading	564/600 = 94% A
• Category: NA	564/600 = 94% A
Science/Health	100/100 = 100% A
• Category: NA	100/100 = 100% A
Social Studies	200/200 = 100% A
• Category: NA	200/200 = 100% A
Writing	200/200 = 100% A
• Category: NA	200/200 = 100% A

Follows classroom rules

E

S

N

Follows directions

E

S

N

Accepts responsibility

E

S

N

Works independently

E

S

N

Quality of work

E

S

N

Starting to talk during
seatwork more / disruptive

- getting out of seat
during lessons taught

Dear Parents,

This progress report does not reflect a complete picture of your child's ability and progress. These grades will go up and down as the trimester continues and more grades are entered. You may keep this copy.

Mom's

STUDENT PROGRESS REPORT

Friday, January 31, 2014

Lewis, Isabella

Ms. Burgess

Twitchell Elementary School

Grade Summary	Overall
Language	874.19/1000 = 87% B
• Category: NA	874.19/1000 = 87% B
Mathematics	637.61/800 = 80% B
• Category: NA	637.61/800 = 80% B
Reading	1862.33/2000 = 93% A
• Category: NA	1862.33/2000 = 93% A
Science/Health	680/700 = 97% A
• Category: NA	680/700 = 97% A
Social Studies	490/500 = 98% A
• Category: NA	490/500 = 98% A
Speaking and Listening	200/200 = 100% A
• Category: NA	200/200 = 100% A
Writing	760/800 = 95% A
• Category: NA	760/800 = 95% A

Follows classroom rules

E

S

N

Follows directions

E

S

N

Accepts responsibility

E

S

N

Work on getting work done in time given. Thx!

Works independently

E

S

N

Quality of work

E

S

N

You may keep this copy.

Exhibit “6”



Maria Daniela Perdomo <perdomomda@gmail.com>

Incomplete HW

4 messages

Maria Daniela Perdomo <perdomomda@gmail.com>
To: "Sarah R.U.T. Burgess" <sburgess@interact.ccsd.net>

Fri, Jan 17, 2014 at 12:52 AM

Hi Mrs Burgess,

I am writing to you because I have noticed by reviewing the homework log, that Isabella it is not completing her reading portion of the homework while she is with the father. She expressed that her father is not helping her with it and that seems to really upset her. However, she's too scared/shy to say anything.

I have noticed she has a lack of interest in reading which is odd because as you already know, she loves to read! Also, she is having a hard time focusing when doing math.

Have you noticed anything different while she in class. Apparently she was absent from school last week and I wasn't informed either.

Could you please give me some feedback on her performance in class.

Thanks in advance for your help.

Sarah R.U.T. Burgess <sburgess@interact.ccsd.net>
To: perdomomda@gmail.com

Fri, Jan 17, 2014 at 7:21 AM

Hi Maria,

Yes, I am glad you emailed me. Recently in the last couple weeks, I have noticed a change in her school performance. For example, I have been constantly telling her to work faster and make sure she's completing her work on time. Luckily, she does complete the rest during student/teacher read aloud, but is still easily distracted by it that I've had to put her in the pod to get it done. During class at times, I have had to sit her at the reading table by herself, so she doesn't get distracted by others in her group and complete her work.

I've also noticed, she's having a difficult time answering questions during Saxon Phonics. I make sure to review these concepts over so she doesn't get behind. She missed last Wednesday and I had written that on her last week's homework packet. I meant to sent it home (yesterday) Thursday for you to see, but my days this week in my head were all messed up, so I think I sent it home Wed. instead! My apologies, because I did want you to see that. Isabella told me dad was sick and had to take care of him. I sent home a blue Decodable for book for her to read and return Friday. Again, I meant for you to get it but believe I sent it home Wed. instead. Hopefully, you saw it and can return it today.

Please let me know if there's anything else I can do! Isabella is a wonderful, sweet girl who can achieve so much! I would hate for her to fall behind in school.

Thanks so much for your concern,
S. Burgess

Maria Daniela Perdomo <perdomomda@gmail.com>
To: Juan Fuente <juanfuentec@gmail.com>, palamidis@hotmail.com

Fri, Jan 17, 2014 at 2:22 PM

Sent from my iPhone

Begin forwarded message:

From: "Sarah R.U.T. Burgess" <sburgess@interact.ccsd.net>
Date: January 17, 2014 at 7:21:19 AM PST
To: perdomomda@gmail.com
Subject: Re: Incomplete HW

[Quoted text hidden]

Juan Fuente <juanfuentec@gmail.com>
To: María Daniela Perdomo <perdomomda@gmail.com>

Fri, Jan 31, 2014 at 10:37 PM

Sent from my iPhone

Begin forwarded message:

From: María Daniela Perdomo <perdomomda@gmail.com>
Date: 17 de enero de 2014 14:22:43 GMT-8
To: Juan Fuente <juanfuentec@gmail.com>, palamidis@hotmail.com
Subject: Fwd: Incomplete HW

[Quoted text hidden]

Exhibit “7”



2360 W. Horizon Ridge Parkway, Ste 120
Henderson, NV 89052
(702) 294-0433
www.oasiscounselingtoday.com

Re: Isabella Sara Lewis

DOB: 08.10.2006

Date: February 19, 2014

To: Frances-Ann Fine

The Fine & Price Law Group

8975 S. Pecos Rd, Suite 5

Henderson, Nevada 89074

Ms. Fine

I am writing this letter in response to your request to provide any clinical information as it relates to the parties' minor child, Isabella Sara Lewis born 08.10.2006, as I have been seeing her in individual therapy.

I have seen Isabella in individual and family therapy with mom since 09.21.2013. I have seen her for a total of 15 sessions as of this date.

I have diagnosed Isabella with a clinical diagnosis of generalized anxiety disorder based on DSM IV-TR criteria. From my findings, observations, and client verbalizations, she has felt in the middle between her mom and biological dad. At the start of therapy Isabella reiterated on several occasions that she wanted a mom and dad, but not where they were fighting all the time. I have been addressing her anger at both school and at home, which was the initial reason client was presented here at Oasis counseling.

In the course of treatment, I have found Isabella to be a very friendly and likeable child who is very pre-occupied about pleasing others, but at the same time having underlying control issues. I have seen her interactions with the mom, which have been very positive, but occasionally angry, especially when we discussed the breakup of the family system. I have used Cognitive therapy, mixed with play therapy, and using art as a vehicle to help her explain feelings in a safe environment. At first she was very quiet when talking about the father and the grandmother. She stated "I have to be extra good because I don't want to get in trouble over there, or for grandma to use the spoon on me." There was a strong effort by Isabella to protect the father. Note she has never stated that she disliked him, but did state that when she goes to his house she gets bored because the dad does not play with her like mom does.

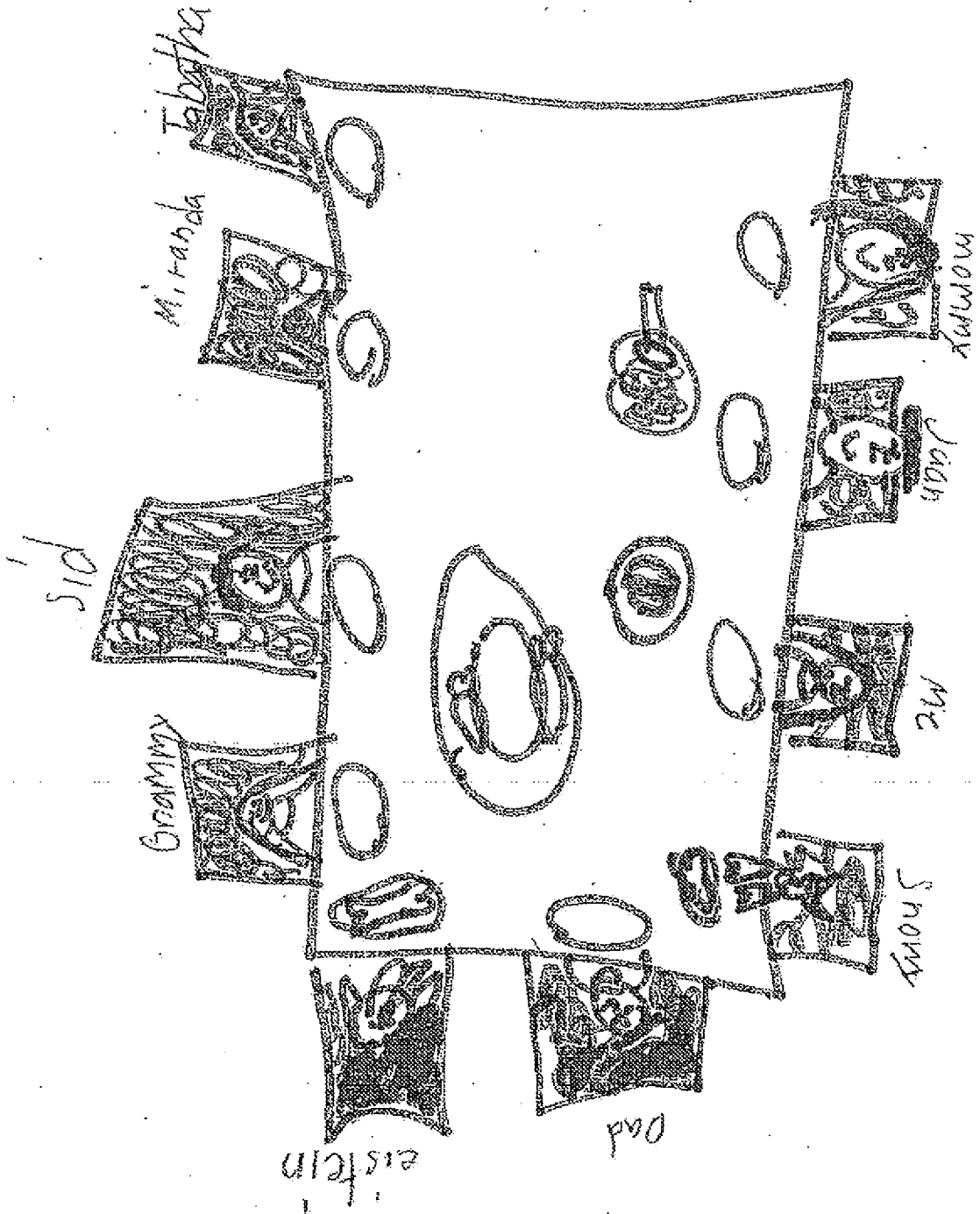
On several occasions I tried to get the father to come in to therapy with his daughter, including leaving a message. To no avail he did not respond. My goal was to view the interactions with my client and her father, to look closely at the interaction as well as to illicit the father's help in making sure she was not being placed in the middle on either a covert or overt level. I was concerned because on three occasions it was reported by the mom, and my client that she was ill, and dad did not take care of her. My client stated, he did not put the medicine on her like mom did. It was also reported that the father did not follow through getting her to the doctor, or calling mom about medical concerns. In two weeks my client went from having a rash on her to having strep throat, which may have been the result of neglect. It was also during this same period that I noticed an increase in anger from Isabella, which had been reduced for some time. The anger did escalate to the point she had hit the mom and mom's boyfriend. It was during this period that client became much quieter, and did not want to discuss any family issues. During play therapy she did verbalize how she would punish people by taking their family away.

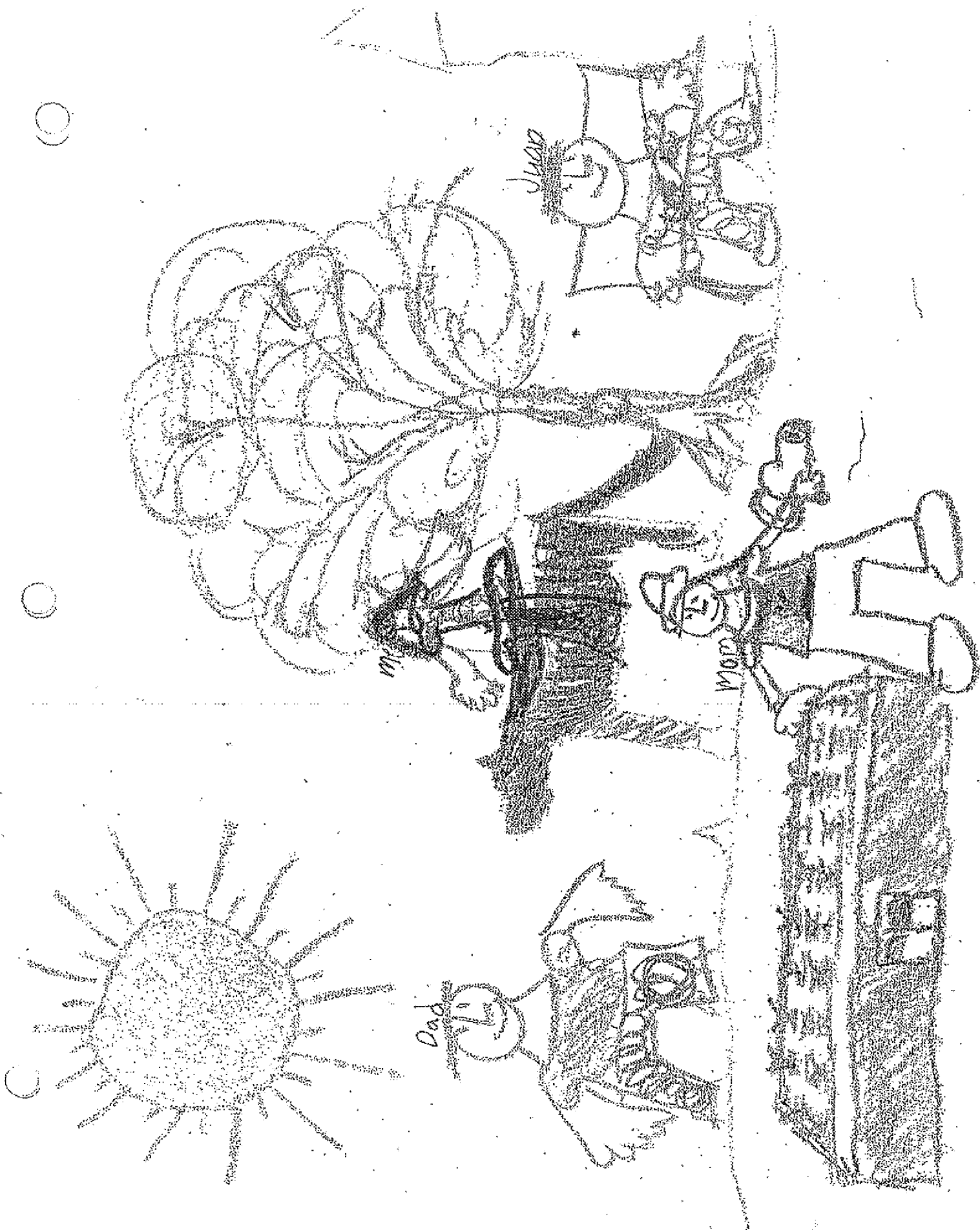
In the last session, Isabella seemed much happier. Stated she liked being around her mom and mom's boyfriend because they "did more with her." During the last session she drew a picture which showed that she, mom and mom's boyfriend were more isolated from her dad. Mom stated that this week Isabella had requested not to go over to dad's this week. Isabella would not address this comment.

In closing I find that Isabella continues to be in the middle, and is still grieving over mom and dad's breakup. Currently I am working on having her adjust to the situation, as a month ago she seemed much happier, and I suggested to mom that since things were going better that perhaps we could reduce the amount of time she is coming into therapy. I changed this once the anger and physical aggression increased. Again, I will reiterate, that it was the time she became physically ill with strep throat that her emotions of stress and anger resurfaced. The anger at school has just recently been reduced, as I have been working with her with anger management and effective communication. It is very important that Isabella feel safe, and not have to take any responsibility for how others deal with their feelings.

Sincerely


Warren Wheatley ACSW, LCSW, DCSW





MAKE CHECKS PAYABLE TO:

Oasis Counseling, LLC
2360 W Horizon Ridge Pkwy Ste 120
Henderson, NV 89052
7022940433

STATEMENT DATE	PAY THIS AMOUNT	ACCOUNT #
2/6/2014	(\$100.00)	2071
PATIENT: Lewis, Isabella		

STATEMENT

Perdomo, Maria
595 South Green Valley Pkwy
henderson, NV 89012

DOS	Pra	Insurer		CPT	Descrip.	Charge	Adjustm	Ins. Paid	Pat. Paid	Ins. Bal	Pat. Bal
9/21/2013	Wheatley	PEBP	MH	90791		\$300.00	\$200.00	\$0.00	\$100.00	\$0.00	\$0.00
9/28/2013	Wheatley	PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
10/5/2013	Wheatley	PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
10/19/2013	Wheatley	PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
10/26/2013	Wheatley	PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
11/16/2013	Wheatley	PEBP	MH	90834	45 minute	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
11/23/2013	Wheatley	PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
12/7/2013	Wheatley	PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
12/21/2013	Wheatley	PEBP	MH	90834	45 minute	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
1/3/2014	Wheatley	PEBP	MH	90847	Family	\$250.00	\$150.00	\$0.00	\$100.00	\$0.00	\$0.00
1/11/2014	Wheatley	PEBP	MH	90834	45 minute	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
1/18/2014	Wheatley	PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
1/25/2014	Wheatley	PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
2/1/2014	Wheatley	PEBP	MH	90834	45 minute	\$200.00	\$0.00	\$0.00	\$0.00	\$200.00	\$0.00
Patient Balance											\$0.00
Unassigned Balance											(\$100.00)
PATIENT BALANCE AMOUNT											(\$100.00)

RECEIPT

Transaction ID: 2836253
Transaction Date: 01/31/2014

Received from: Maria Perdomo

\$ 406.06

For: DOS: 1/3, 1/11, 1/18, 1/25 \$ 2/1

Method: ☐ Cash ☐ Check ☒ Credit Card ☐ Other

Card Type: Master Card

Acct. No.: *****8456

Auth. No.: 27411Z

I agree to pay above total amount according to card issuer agreement.

Sig.: _____


Date: _____

Received By: _____

Karina

Maria Perdomo

Oasis Counseling, LLC



Oasis Counseling LLC

2360 W. Horizon Ridge Pkwy.
Suite 120
Henderson, NV 89052

Phone: (702) 294-0433
Fax: (702) 446-8363

oasiscounseling@gmail.com
oasiscounselingtoday.com
VETERAN, SUBSTANCE ABUSE SPECIALIST

Walter Wheatley, ACSW, LCSW
Licensed Clinical Social Worker
Psychotherapist

Henderson. The Clinic is within minutes from Green Valley, St. Rose Medical Center, Horizon Ridge Pkwy, and the Anthem area.

Our staff of Nevada Licensed mental health professionals represent a broad range of expertise and specialty areas.

Medical Psychotherapy

Serving patients who are dealing with psychological effects on physical/medical condition and vice versa. Specialists assessing and counseling all age groups coping with the effects of acute and chronic illness and life threatening conditions.

- Cancer
- Heart Disease
- Kidney Disease
- Fibromyalgia
- Diabetes
- Arthritis
- Hypochondriasis
- Pain Management
- Post Partum Depression
- Chronic Health Issues
- PMS
- Weight Management
- Smoking Cessation
- Stress Management

Couples & Family Counseling

Direct and sensitive treatment of issues effecting couples and/or families.

Services

Anxiety & Mood Disorders

Assessment and treatment of Anxiety and Depressive Disorders.

- Panic Disorder
- Post Traumatic Stress
- Generalized Anxiety
- Obsessive-Compulsive
- Social Anxiety Disorder
- Major Depression
- Bi-Polar Depression
- Short term Depression
- Grieving Loss
- Phobias

Child/Adolescent Counseling

Providing a broad range of services for children and adolescents experiencing learning, motivational, behavioral, emotional, or social adjustment problems.

- Pediatric Specialty Services
- Child Counseling
- Attention Deficit Disorders (ADHD)
- Adolescence Counseling
- Parenting Training
- Internal Family Systems
- Learning/Motivation

Hypnosis & Stress Management

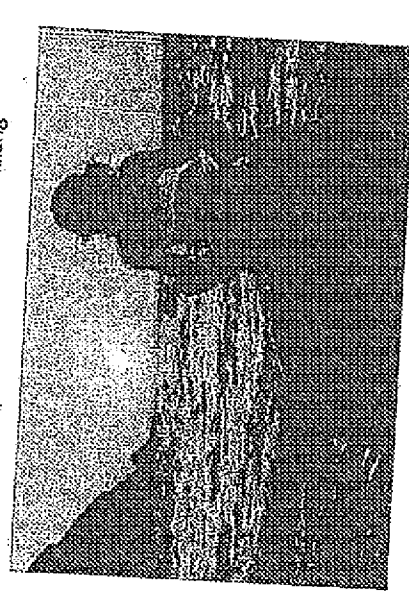
Utilization of Hypnotic and Relaxation Methods for many conditions. Stress management in learning, and developing techniques to reduce overall tension and stress at work, school, home and away. Assertiveness training to meet your needs and reduce shyness.

Psychological Assessment

Licensed Psychologists in the community are utilized and consulted to provide assessment services for children, adolescents, adults and elders for psychological, vocational, learning disabilities, and memory testing for essential information needed for counseling treatment..

Specialty Services

- Internal Family Systems Therapy
- EMDR (Eye Movement Desensitization Rep)
- Desensitization Therapy
- Brain Wave Biofeedback
- Leadership Planning/Business Consulting



Telephone: (702) 294-0433

Fax: (702) 446-8363

Learn More at Our Website at:
<http://oasiscounselingtoday.com>

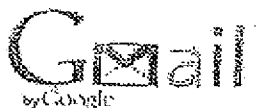
Exhibit “8”

#14

Shrubs

ST. ROSE PEDIATRICS, LLP		377462		WELL <input checked="" type="checkbox"/> SICK <input type="checkbox"/> FU <input type="checkbox"/>	
NAME (Last) Lewis		(First) Isabella		DOB 8/10/06	
MEDICATIONS		Allergies NKDA		AUG 08 2013	
AGE 7yr		46 1/2 in. % 75-80		Wt 41 lbs. % 5-10	
VITALS: Temp 97.4		P 109		RR 97/63	
CC NP-WC		+ also congestion & poss Allergies, from x 4 days		Headache <input type="checkbox"/> Days	
HPI/ROS/DEV		+ Child has alot of nightmares mom wants a referral for Specialist		Earache <input type="checkbox"/>	
HOSP		FIT-allergies / M2 20		Fever <100 <input checked="" type="checkbox"/>	
SURG		no allergies		Coughing <input type="checkbox"/> 4	
ROS		purely		Runny Nose <input type="checkbox"/> 4	
RE-Exam		Patient Not Examined		Vomiting <input type="checkbox"/>	
N AD		N AD		Diarrhea <input type="checkbox"/>	
ASSESSMENT		Well Check		Sore Throat <input type="checkbox"/>	
1		allergies		Sick Contacts <input type="checkbox"/>	
2		LMD			
PLAN:		Psychology			
1		Ophthalmology			
2		M2 20			
3		M2 20			
RTIC if respiratory distress, jaundice, lethargy		NS		Newborn <input type="checkbox"/>	
Warning Signs Discussed		Bulb Syringe		Newborn Pamphlet <input type="checkbox"/>	
Antic. Guid. Discussed: Behavior		Cool Mint		Age Appropriate <input type="checkbox"/>	
Safety		OTC / Cough / Cold		ASAP if worsening symptoms, toxic <input type="checkbox"/>	
ORDERS		IMMUNIZATIONS		Follow Up	
Tylenol Elixir cc PO		DTap 1 2 3 4 5		pin <input type="checkbox"/>	
Ibupro. Susp. cc PO		HIB 1 2 3 4		day(s) <input type="checkbox"/> wk(s) <input type="checkbox"/> mo(s) <input type="checkbox"/>	
Albuterol UD Neb x		IPV 1 2 3 4		Next Well Check @ <input type="checkbox"/> old	
Atrivent UD Neb x		PCV 13 1 2 3 4 5		Rapid Strep <input type="checkbox"/>	
Xopenex .63 mg UD Neb x		Hep B 1 2 3		pos <input type="checkbox"/> neg <input type="checkbox"/>	
Pulmicort UD Neb x		Pediarix 1 2 3		UA <input type="checkbox"/>	
Prelone cc PO		HPV 1 2 3		Throat Cx <input type="checkbox"/>	
Rocaphin mg IM		Rotarix/teq 1 2 3		Stool Guaiac <input type="checkbox"/>	
Pulse Oximetry		MMR 1 2		pos <input type="checkbox"/> neg <input type="checkbox"/>	
		Hep A 1 2		Routine Cx <input type="checkbox"/>	
		Influenza 1 2		O & P <input type="checkbox"/>	
		Flu Melt 1 2		C. Difficile <input type="checkbox"/>	
		Varivax 1 2		Rotavirus <input type="checkbox"/>	
		Menveo 1 2		Fecal WBC <input type="checkbox"/>	
		Menactra 1		Giardia <input type="checkbox"/>	
		Tdap 1			
		Kindix 1			
				HEARING <input type="checkbox"/> Passed <input type="checkbox"/> Not Passed <input type="checkbox"/>	
				SIGNATURE <input type="checkbox"/> 8/20/40 9/20/40 8/20/40	
				Heath Hodapp, MD	

Form SR-100 Progress Notes (03/20/13)



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's DR. Appointment

2 messages

Wesley Lewis <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 1:12 PM

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Maria if you could please give proper notice for me to attend Isabellas doctors appointments I rescheduled my schedule to attend her appointment on the fourth you did not inform me that the DR. canceled the 4th and rescheduled it for the fifth at 2:30 which gave me exactly around what 16 hours notice after I did send you text messages and I did try to call Isabella's phone. You sent me a email at 7:38 PM after I send you text messages at 6:00 PM to wonder where this doctors office was you respond in ways that are not helpful to coparenting please all I'm asking is consideration for others

Sent from Wesley Lewis

Maria Daniela Perdomo <perdomomda@gmail.com>

Sat, Oct 5, 2013 at 2:42 PM

To: juanfuentec@gmail.com

Sent from my iPhone

Begin forwarded message:

From: Wesley Lewis <info4WLewis@yahoo.com>

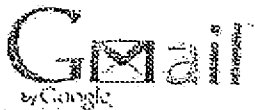
Date: October 5, 2013, 1:12:13 PM PDT

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Subject: Isabella's DR. Appointment

Maria if you could please give proper notice for me to attend Isabellas doctors appointments I rescheduled my schedule to attend her appointment on the fourth you did not inform me that the DR. canceled the 4th and rescheduled it for the fifth at 2:30 which gave me exactly around what 16 hours notice after I did send you text messages and I did try to call Isabella's phone. You sent me a email at 7:38 PM after I send you text messages at 6:00 PM to wonder where this doctors office was you respond in ways that are not helpful to coparenting please all I'm asking is consideration for others

Sent from Wesley Lewis



Maria Daniela Perdomo <perdomomda@gmail.com>

Respectful parenting and proper advance notice of appointment changes
2 messages

Wesley Lewis <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 2:27 PM

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Maria I called the doctors office Dr. Wheatley's office and they're not open on the weekends so if I'm not able to even get in contact with the doctor on my own account to understand how this appointment was rescheduled after being canceled due to the doctors personal reasons I feel it's in best interest if it would be rescheduled at a different time where everybody could attend and I can contact the doctor on the day of their operational hours I don't know how this doctor is at his office when the office is closed it makes it rather frustrating on my side due to the short notice and due to lack of communication thanks again

Regards

Wesley Lewis

Sent from Wesley Lewis

Maria Daniela Perdomo <perdomomda@gmail.com>

Sat, Oct 5, 2013 at 2:41 PM

To: juanfuentec@gmail.com

Sent from my iPhone

Begin forwarded message:

From: Wesley Lewis <info4WLewis@yahoo.com>

Date: October 5, 2013, 2:27:12 PM PDT

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Subject: Respectful parenting and proper advance notice of appointment changes

[Quoted text hidden]



Maria Daniela Perdomo <perdomomda@gmail.com>

Confirmation for Isabella's appointment

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 11:41 AM

Correction, Isabella's appointment is at 3:00 pm today not at 2:30. We hope to see you there. Please confirm if you can attend.

Sincerely,
Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: October 4, 2013, 7:36:57 PM PDT
To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>
Subject: Isabella's Psychologist Appointment has changed

Wesley,

Please be aware that Warren Wheatley canceled this afternoon's appointment on the last minute, due to personal reasons. He reschedule for tomorrow after 2:30 pm.

I have not receive any confirmation of your assistance, please let me know if you will be able to attend tomorrow. If you cannot, Warren will contact you directly to schedule a meeting.

Sorry for any inconveniences this may cause.

Sincerely,

Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: September 29, 2013, 7:18:45 PM PDT
To: Wesley Allen Lewis <info4WLewis@yahoo.com>
Subject: Fwd: Isabella's Psychologist Appointment

Wesley,

I am writing to you to inform you that the psychologist evaluated Isabella and determined that she is having a depression, so she is going to start seeing Dr. Warren Wheatley once per week. The next appointment will be Friday, October 4th @ 6:00 pm at Oasis Counseling.

I am letting you know in advance so you can plan your schedule and be able to attend.

Sincerely,

Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: September 25, 2013, 8:59:12 PM PDT
To: Wesley Lewis <info4wlewis@yahoo.com>
Subject: Re: Isabella's Psychologist Appointment

Wesley,

I am sorry but the appointment cannot be rescheduled. Hope you can clear your agenda and make it on Saturday Sept 28th, if you cannot then I will inform you the outcome.

Sincerely,

Maria Perdomo

Sent from my iPhone

On Sep 25, 2013, at 3:47 PM, Wesley Lewis <info4wlewis@yahoo.com> wrote:

Maria

I'm quite sure that had a typo when informing of the date of Isabella's appointment ... "this" followed by "next" Sat. the 28th doesn't make sense ..and isn't adequate time for me to make arrangements to attend..please reschedule the appointment due to the sensitive nature of the appointment. thanks again, as for her phone its on and you talked with her by calling the land line tues afternoon.. so let me know the date of the rescheduled appointment so I can attend thanks maria..
Wesley Lewis

From: Maria Daniela Perdomo <perdomomda@gmail.com>

To: "info4WLewis@yahoo.com" <info4WLewis@yahoo.com>
Sent: Tuesday, September 24, 2013 7:12 PM
Subject: Isabella's Psychologist Appointment

Wesley,

I am writing to you regarding Isabella's appointment with the psychologist as suggested by Dr Heath Hodapp, on August 8th medical examination we both attend to at St. Rose Pediatrics.

I am letting you know that I have scheduled an appointment with Dr Warren Wheatley from Oasis Counseling LLC, this next Saturday September 28th at 10:00 am and your presence is required.

Directions:
2360 W. Horizon Ridge Parkway, Suite
120, Henderson, NV 89052
(702) 294 0433
<http://www.oasiscounselingtoday.com/>

Consultation price is 100.00 USD per hour.
Ps: could you please check that Isabella's phone is turn on as I have been trying to call her several times after school and I haven't able to talk to her.

Regards,

Maria Perdomo

Sent from my iPhone

Maria Daniela Perdomo <perdomomda@gmail.com>
To: juanfuentec@gmail.com

Sat, Oct 5, 2013 at 12:36 PM

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: October 5, 2013, 11:41:31 AM PDT
To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>
Subject: Confirmation for Isabella's appointment

<https://mail.google.com/mail/u/0/?ui=2&ik=b8d4715031&view=pt&search=sent&th=14189ecc2cb71c58>

[Quoted text hidden]

Exhibit “9”

Confidential Information

SL Rose Pediatrics, 2350 W. Horizon Ridge Parkway, Henderson, Nevada 89052

702-564-8558

Encounter Summary

ISABELLA LEWIS (Sex: F, DOB: 8/10/2006)

Date of Visit: 1/24/2014

Chief Complaint

SKIN RASH, dry skin and it itches a lot

Fever: None

ROS Findings

Respiratory: Denies daytime cough, nighttime cough disturbing sleep.
Gastrointestinal: Denies vomiting, diarrhea.

Patient History

Allergies, Past Medical History reviewed and *updated*, pertinent for:
Allergies/Reactions Reviewed by Michael Verona (350) 01/24/2014 14:35:30
No active medication allergies or reactions

Medication List Reviewed by Michael Verona (350) 01/24/2014 14:35:43

Problem List Reviewed by Dominic LaRocco (368) 01/24/2014 15:04:19

Vital Signs

Temp (TA): 98.7F / 37.1c @14:35
Weight: 48lb 8oz / 21.14kg (21 %ile)

Exam Findings

Constitutional: Normal general appearance: alert, pleasant, not ill appearing, no distress.
Eyes: Normal conjunctivae & lids: pink & moist.
Ears, Nose, Mouth, Throat: Normal canals & TMs: clear with normal landmarks & light reflex; nares: clear;
oropharynx: moist mucous membranes, without pharyngeal erythema or intraoral lesions.
Neck: Normal neck: supple, trachea midline, no masses or significant adenopathy; without meningeal signs; thyroid:
no enlargement or mass.
Respiratory: Normal respiratory effort: no retractions, no tachypnea; auscultation of lungs: clear & equal breath
sounds without rales, rhonchi or wheeze.
Cardiovascular: Normal palpation of heart: PMI nondisplaced; auscultation of heart: regular rate & rhythm, no
murmur.
Gastrointestinal: Normal abdomen: soft, nontender/nondistended, normal bowel sounds, no mass; liver & spleen: no
hepatosplenomegaly.
Skin: ABNORMAL inspection: + generally dry skin with erythematous patches/scaling.

Assessment

Eczema

DX 1: 691.8 ATOPIC DERMATITIS AND RELATED CONDITIONS OTHER

Plan

Discussed daily moisturizer, skin care
Avoid chemical irritants/use hypoallergenic detergents/soaps and no fabric softener/dryer sheets
For flares:
Call if no better 1-2 weeks, sooner for change/concerns.
Recheck in office prn

Patient Instructions

You were seen in our office today for eczema, also known as atopic dermatitis. It is important to realize that eczema
cannot be "cured" but rather controlled through a variety of strategies. It is common for eczema to have periodic flare

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Page 1 of 2

Encounter Summary
ISABELLA LEWIS (Sex: F, DOB: 8/10/2006)
Date of Visit: 1/24/2014

ups which may require additional intervention. Treatment is focused on decreasing skin irritants and improving moisturization. When patients experience "flare ups" you will likely see rough, red, scaly patches at various locations. Flares may be triggered by change in weather, exposures to allergens or an illness. We will give you strategies including specific medications to use when your child has flares. Please follow the directions on your prescriptions closely. Contact our office if your child is not improving or you have additional questions or concerns. Additional information may be found at:
<http://www.healthychildren.org/English/health-issues/conditions/skin/Pages/Eczema.aspx>

Prescriptions

hydrocortisone ointment 2.5%

Dispense: 60 (sixty) gram

Apply topically twice a day

Start date: 01/24/2014

End date: 01/24/2014

Refills: 0

Substitutions Permitted

Procedures

99213 OFFICE/OUTPATIENT VISIT, EST

Patient accompanied by: Mother

Rendering Provider: Dominic LaRocco, PA (368)

Supervising Provider: Heath Hodapp, MD (317)

Assisted By: Michael Verona (350)

Finalized By: Dominic LaRocco, PA (368) 01/24/2014 03:13 PM

Electronically Signed by: Dominic LaRocco, PA
License Number: 364

1/24/2014

Date

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Page 2 of 2

YOUR PERSONAL PRESCRIPTION INFORMATION

Your Walgreens Pharmacy Location
601 S Green Valley Parkway
Henderson, NV 89052
(702)896-2956

IF YOU HAVE QUESTIONS ABOUT YOUR PRESCRIPTION, PLEASE CONTACT YOUR WALGREENS PHARMACIST OR CALL 1-800-WALGREENS.

PATIENT	ISABELLA LEWIS	DOCTOR	D. LAROCCO, PBR	DRUG DESCRIPTION
BIRTH DATE	08/10/06			
MEDICATION	HYDROCORTISONE 2.5% OINT 28.35GM	PATIENT		
QUANTITY	56.7	ALLERGIES		
DIRECTIONS	APPLY TOPICALLY TWICE DAILY			

INGREDIENT NAME: HYDROCORTISONE
(HYE-droe-KOR-ti-sone)

COMMON USES: This medicine is a corticosteroid used to reduce itching, redness, and swelling associated with many skin conditions. It may also be used to treat other conditions as determined by your doctor.

BEFORE USING THIS MEDICINE: INFORM YOUR DOCTOR OR PHARMACIST of all prescription and over-the-counter medicine that you are taking. ADDITIONAL MONITORING OF YOUR DOSE OR CONDITION may be needed if you are taking prednisone (or similar medicines). Inform your doctor of any other medical conditions, allergies, pregnancy, or breast-feeding.

HOW TO USE THIS MEDICINE: Follow the directions for using this medicine provided by your doctor. TO USE THIS MEDICINE: apply a small amount of medicine to the affected area. Gently rub the medicine in until it is evenly distributed. Wash your hands after applying this medicine, unless your hands are part of treated area. DO NOT BANDAGE OR WRAP the affected area unless directed otherwise by your doctor. STORE THIS MEDICINE at room temperature, away from heat and light. KEEP THIS MEDICINE out of the reach of children and away from pets. IF YOU MISS A DOSE OF THIS MEDICINE, apply it as soon as possible. If it is almost time for your next dose, skip the missed dose and go back to your regular dosing schedule.

CAUTIONS: DO NOT TAKE THIS MEDICINE if you have had an allergic reaction to it or are allergic to any ingredient in this product. IF YOUR SYMPTOMS DO NOT IMPROVE WITHIN A FEW DAYS, or if they become worse, check with your doctor. DO NOT EXCEED THE RECOMMENDED DOSE or use this medicine for longer than prescribed without checking with your doctor. KEEP ALL DOCTOR AND LABORATORY APPOINTMENTS while you are using this medicine. Do not use any other medicines or special cleansers on your skin unless your doctor instructs you otherwise. AVOID GETTING THIS MEDICINE IN YOUR EYES or on the inside of your nose or mouth. CAUTION IS ADVISED WHEN USING THIS

MEDICINE IN CHILDREN because they may be more sensitive to the effects of the medicine. FOR WOMEN: IF YOU PLAN ON BECOMING PREGNANT, discuss with your doctor the benefits and risks of using this medicine during pregnancy. IT IS UNKNOWN IF THIS MEDICINE IS EXCRETED in breast milk. IF YOU ARE OR WILL BE BREAST-FEEDING while you are using this medicine, check with your doctor or pharmacist to discuss the risks to your baby.

POSSIBLE SIDE EFFECTS: CHECK WITH YOUR DOCTOR AS SOON AS POSSIBLE if you experience skin thinning and discoloration, stinging, rash, dry skin, itching, burning, redness, or swelling not present before using this medicine. If you notice other effects not listed above, contact your doctor, nurse, or pharmacist. This is not a complete list of all side effects that may occur. If you have questions about side effects, contact your healthcare provider. Call your doctor for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088.

OVERDOSE: If overdose is suspected, contact your local poison control center or emergency room immediately. Symptoms may include muscle weakness; severe or persistent headache; symptoms of high blood sugar (eg, increased thirst, hunger, or urination; confusion; drowsiness; flushing; rapid breathing; fruit-like breath odor); unusual weight gain, especially in the face; or vision changes.

ADDITIONAL INFORMATION: DO NOT SHARE THIS MEDICINE with others for whom it was not prescribed. DO NOT USE THIS MEDICINE for other health conditions. KEEP THIS MEDICINE out of the reach of children. IF USING THIS MEDICINE FOR AN EXTENDED PERIOD OF TIME, obtain refills before your supply runs out.

KEEP OUT OF REACH OF CHILDREN: STORE IN SAFETY CONTAINER OR SECURE AREA.

Call your doctor for medical advice about side effects.
You may report side effects to FDA at 1-800-FDA-1088.

Do not flush unused medications or pour down a sink or drain.

WIC# 216392

YOUR DOCTOR. KEEP ALL DOCTOR AND LABORATORY APPOINTMENTS while you are using this medicine. Do not use any other medicines or special cleansers on your skin unless your doctor instructs you otherwise. AVOID GETTING THIS MEDICINE IN YOUR EYES or on the inside of your nose or mouth. CAUTION IS ADVISED WHEN USING THIS

KEEP OUT OF REACH OF CHILDREN; STORE IN SAFETY CONTAINER OR SECURE AREA.

WIC# 216382

ISABELLA LEWIS

8000 West Bauda #1013, Las Vegas, NV 89113
7021490-2082

RX# 0553063-06615

DATE: 01/24/14

HYDROCORTISONE 2.5% OINT 28.35GM
QTY: 56.7 NO REFILLS - DR. AUTH REQUIRED
New NDC: 00168-0146-30
Retail Price: \$27.99 Your Insurance Saved You: \$17.91

\$ 10.08

D. LAROCCO, PBR
MFG: FOUGERA
JCR/JCH/JCR/ JCR

PLAN: CTRX
GROUP# STNV
CLAIM REF# 140277505320007995

Walgreens

801 S GREEN VALLEY PARKWAY HENDERSON, NV 89052
PH: (702) 896-2956

Customer
Receipt

Pharmacy use only

ISABELLA LEWIS

8000 West Bauda #1013, Las Vegas, NV 89113
7021490-2082

RX# 0553063-06615

DATE: 01/24/14

HYDROCORTISONE 2.5% OINT 28.35GM
QTY: 56.7 NO REFILLS - DR. AUTH REQUIRED
New NDC: 00168-0146-30
Retail Price: \$27.99 Your Insurance Saved You: \$17.91

\$ 10.08

D. LAROCCO, PBR
MFG: FOUGERA
JCR/JCH/JCR/ JCR

PLAN: CTRX
GROUP# STNV
CLAIM REF# 140277505320007995

Walgreens

801 S GREEN VALLEY PARKWAY HENDERSON, NV 89052
PH: (702) 896-2956

Duplicate
Receipt

FRI 5:32PM
New

HYDROCORTISONE 2.5% OINT 28.35GM
00168-0146-30
ALPHA

QTY 56.7

JCR/JCH/JCR/ JCR

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LOOK INSIDE FOR IMPORTANT DETAILS ABOUT YOUR MEDICATION.

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ISABELLA LEWIS
8000 West Bauda #1013
Las Vegas, NV 89113
(702) 490-2082
*Your Insurance Saved You: \$17.91

Welcome
01/24/14
New
Need Allergy Info

FRI 5:32PM
\$10.08

25
LE
CTRX
0553063 0301 5 000103 4*

Exhibit “10”



Maria Daniela Perdomo <perdomomda@gmail.com>

Indications for Isabella's skin condition

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Sun, Jan 26, 2014 at 9:08 PM

To: Wesley Allen Lewis 7023401221 <info4WLEwis@yahoo.com>

Wesley,

As I told you last Thursday, Isabella had a severe skin rash all over her body. Therefore I took her to the doctor immediately, and she was diagnose with severe skin dryness as a result of being over expose to hard water, meaning frequent long baths, that combined to the winter weather worsen her condition.

Finally, the doctor prohibited Isabella to take baths until summer. Therefore she should only take showers, for no longer than two minutes. Also, you should apply the ointment I putted on her backpack twice a day preferably after showers even if the skin looks moisturize.

I will appreciate you follow these indications, as this condition is extremely unpleasant for Isabella to the point she can not focus in class.

Maria Daniela Perdomo



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's Skin Rash 01/23/14

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Maria Daniela Perdomo 7028852853 <perdomoMDA@gmail.com>

Mon, Feb 3, 2014 at 10:16 AM

Sent from my iPhone

Exhibit “11”

Confidential Information

St. Rose Podiatry, 2350 W. Horizon Ridge Parkway, Henderson, Nevada 89052

702-564-8555

Encounter Summary
ISABELLA LEWIS (Sex: F, DOB: 08/10/2006)
Date of Visit: 01/31/2014

Chief Complaint

sore throat, cough, and red swollen eye today
decreased appetite, decreased activity

Fever: Low grade; Onset: 2 days ; Duration: Intermittent; Severity: Mild; Quality: Worsening
sore throat, low grade fever, swollen eye today
decreased appetite, restless sleep last night

ROS Findings

Constitutional: Reports fever/chills, body aches, headachy, loss of appetite, not sleeping well.

Eyes: Reports red eyes or eye drainage.

ENT: Reports runny nose and/or nasal congestion, sore throat, difficulty swallowing. Denies postnasal drip, ear pain, mouth ulcers.

Respiratory: Reports daytime cough, nighttime cough disturbing sleep. Denies wheezing or difficulty breathing.

Cardiovascular: Denies fainting during exercise.

Gastrointestinal: Reports decreased appetite. Denies nausea, vomiting, diarrhea.

Genitourinary (M/F): Reports good urine out put. Denies bloody, tea colored or dark urine.

Musculoskeletal: Reports normal activity when fever down.

Integumentary (Skin/Breast): Denies rashes or dry skin.

Patient History

Allergies, Past Medical History reviewed and updated, pertinent for:
Problem List Reviewed by Thalia Guerra (681) 01/31/2014 16:07:19

Allergies/Reactions Reviewed by Thalia Guerra (681) 01/31/2014 16:07:21
No active medication allergies or reactions

Medication List Reviewed by Thalia Guerra (681) 01/31/2014 16:07:23
OTC cough suppressant

Problem List Reviewed by Diane Goebel (440) 02/01/2014 23:14:09

Allergies/Reactions Reviewed by Diane Goebel (440) 02/01/2014 23:14:11
No active medication allergies or reactions

Medication List Reviewed by Diane Goebel (440) 02/01/2014 23:14:14

Vital Signs

Pulse Oximetry: 100 % @16:08
Pulse: 105 bpm
Temp (TA): 99.2F / 37.3C
Weight: 46lb / 20.91kg (18 %ile)

Exam Findings

Constitutional: Normal general appearance: alert, pleasant, not ill appearing, no distress.

Eyes: ABNORMAL conjunctivae & lids: no d/c no inflammation mild swelling left eye.

Ears, Nose, Mouth, Throat: ABNORMAL oropharynx: moist mucous membranes, with erythematous 3+ tonsils, exudate and palatal petechiae. Normal canals & TMs: clear with normal landmarks & light reflex; nares: clear.

Neck: ABNORMAL neck: supple, slightly increased anterior cervical adenopathy. Normal without meningeal signs.

Respiratory: Normal respiratory effort: no retractions, no tachypnea; auscultation of lungs: clear & equal breath

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Page 1 of 3

sounds without rales, rhonchi or wheeze.

Cardiovascular: Normal palpation of heart: PMI nondisplaced; auscultation of heart: regular rate & rhythm, no murmur.

Skin: Normal inspection: no scarletiform rash.

Assessment

Group A strep pharyngitis

Group A strep pharyngitis

DX 1: 034.0 STREPTOCOCCAL SORE THROAT

DX 2: 780.60 FEVER, UNSPECIFIED

Plan

Rapid Strep: POSITIVE

Antibiotics as prescribed:

Treat symptoms with acetaminophen or ibuprofen as needed

Increase fluids

Discussed strep throat and expected course

Discussed contagious until on antibiotics for 24 hours

Follow up if not improved in 48-72 hrs or sooner if lethargy, irritability, poor feeding, persistent temperature, respiratory distress or poor urine output.

recheck pm

Rapid Strep: POSITIVE

Antibiotics as prescribed:

Treat symptoms with acetaminophen or ibuprofen as needed

Increase fluids

Discussed strep throat and expected course

Discussed contagious until on antibiotics for 24 hours

Follow up if not improved in 48-72 hrs or sooner if lethargy, irritability, poor feeding, persistent temperature, respiratory distress or poor urine output.

recheck pm

Patient Instructions

You were seen today for a strep throat, a bacterial infection of the throat caused by *Streptococcus pyogenes*. You have received a prescription for antibiotics, and it is important that you complete your medication according to the directions. Strep throat is not only treated to make the child feel better, but also to prevent potential complications of strep throat such as rheumatic fever. It is important that your child drink enough to stay well-hydrated. You may use acetaminophen or ibuprofen as needed for comfort. In addition, your child is contagious until on antibiotics for 24 hours and should not return to school/day care until fever-free x 24 hours and feeling improved. Call our office if your child is having difficulty swallowing, is not responding to medicine or you have other concerns. More information may be available at:

<http://www.healthychildren.org/English/health-issues/conditions/infections/Pages/Group-A-Streptococcal-Infections.aspx>

You were seen today for a strep throat, a bacterial infection of the throat caused by *Streptococcus pyogenes*. You have received a prescription for antibiotics, and it is important that you complete your medication according to the directions. Strep throat is not only treated to make the child feel better, but also to prevent potential complications of strep throat such as rheumatic fever. It is important that your child drink enough to stay well-hydrated. You may use acetaminophen or ibuprofen as needed for comfort. In addition, your child is contagious until on antibiotics for 24 hours and should not return to school/day care until fever-free x 24 hours and feeling improved. Call our office if your child is having difficulty swallowing, is not responding to medicine or you have other concerns. More information may be available at:

<http://www.healthychildren.org/English/health-issues/conditions/infections/Pages/Group-A-Streptococcal-Infections.aspx>

Prescriptions

Amoxicillin Suspension for Reconstitution 400 mg/5 mL

Dispense: 200 (two hundred) mL

Take 10 mL by mouth twice a day for 10 days
(10 mL = 800 mg) (5 mL = 1 tsp)

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Encounter Summary
ISABELLA LEWIS (Sex: F, DOB: 08/10/2006)
Date of Visit: 01/31/2014

Start date: 01/31/2014
End date: 02/10/2014
Refills: 0
Substitutions Permitted

Orders

PULSE OX(IN HOUSE)
In House Diag Tests: STREP ASSAY

Diagnostic Tests

STREP ASSAY: POSITIVE Note: no culture sent to lab.mo

Procedures

99214 OFFICE/OUTPATIENT VISIT, EST

Patient accompanied by: Mother
Rendering Provider: Diane S. Goebel, MD (440)
Assisted By: (681)
Finalized By: Diane S. Goebel, MD (440) 02/01/2014 11:15 PM

01/31/2014

Electronically Signed by: Diane S. Goebel, MD
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Date

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Kenneth Misch, M.D., F.A.A.P.
Heath Hodapp, M.D., F.A.A.P.
Michael Alazard, M.D., F.A.A.P.
S. Sangeeta Krishen, M.D., F.A.A.P.
Diane S. Goshel, M.D., F.A.A.P.
Denise Ogletree-McGinn, MS, D. MINN, APRN



ST. ROSE
PEDIATRICS

Rosemary Y. Hyun, M.D.
Ivana Winkler, M.D., F.A.A.P.
Gayle Grisman, M.S.N., F.N.P.
Robert A. Shapiro, M.D.H.A., P.A.-C.
Dominic LaRocco, M.D.H.A., P.A.-C.

Phone: (702) 564-8556 Fax: (702) 564-4485

Date

1/31/14

Name Isabella Lewis

D.O.B.

08/10/06

Address 595 S. Green Valley Pkwy #923

Ph.

(702) 885-2853

Rx Has strep throat
Needs to finish Amox
for few days - if not
can get strep & rheumatic
fever & let her heart
disease

☐ Label
Refill

times

10 each

DEA#

M.D.

Dispense only as written ☐

2350 W. Horizon Ridge Pkwy • Henderson, NV 89052
7220 S. Cimarron Road, Suite 165 • Las Vegas, NV 89113

Home	Slideshow Pictures	Image Collection	Quizzes	Diseases & Conditions	Symptom Checker	Health & Living	Medications	MedTerms Dictionary	Pet Health
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 Multiple Sclerosis Facts
 Eczema Slideshow
 Psoriasis Slideshow
 Childhood ADHD Slideshow
 Atrial Fibrillation Slideshow

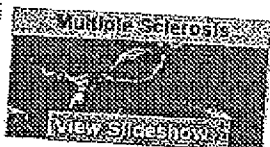
TOP 10

Strep Throat (GAS) Related Articles

Adenoids and Tonsils
 Group B Strep
 Heart Murmur
 Infectious Mononucleosis
 Rapid Strep Test
 Sleep Apnea
 Snoring
 Sore Throat (Pharyngitis)
 Tonsillectomy
 Upper Respiratory Infection
[Complete List >](#)

Cold and Flu Topics

Sore Throat Remedies
 Is Laryngitis Contagious?
 Flu Treatment
 Home Remedies for the Common Cold
 Causes of Fever
 Types of Flu Vaccine
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Latest Cold and Flu News

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 Hand Washing, Zinc May Ward Off Colds: Review
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Related Diseases

Images & Quizzes

PREVIOUS

1 2 3 4 5 6 7 NEXT

Strep Throat (GAS) (cont.)


[Just a Sore Throat or Strep Slideshow](#)
[Take the Strep Throat Infection Quiz!](#)
[Infectious Mononucleosis Slideshow](#)
Medical Author: [John Mersch, MD, FAAP](#)Medical Editor: [William C. Shiel Jr., MD, FACP, FACR](#)Medical Editor: [Mallissa Conrad Stappeler, MD](#)

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PRINT

What are the potential complications of strep throat?

The possible complications of strep throat include:

Comment on this
[Share Your Story](#)

- Acute rheumatic fever (see below),
 - Glomerulonephritis (see below),
 - Otitis media (middle ear infection),
 - Toxic shock syndrome (a rare but severe complication which may result in the failure of multiple organs and may thus be fatal),
 - Peritonsillar abscess or retropharyngeal abscess (walled off infection containing GAS bacteria and pus which may encroach upon the structures in the back of the throat or invade and rupture into deeper structures which may ultimately be fatal), and PANDAS (Pediatric Autoimmune Neuropsychiatric Disorder Associated with Strep) - (see below).
- Acute rheumatic fever (ARF): While rare, this complication of an untreated or inadequately treated strep infection can have devastating and lifelong consequences. It is believed that due to incomplete eradication of the strep bacteria,

IN THIS ARTICLE

What is strep throat and what causes strep throat?

What are the signs and symptoms of strep throat?

Are the signs and symptoms of strep throat different in various age groups?

Is strep throat contagious?

How is the diagnosis of strep throat established?

What are home remedies, OTC, and medical treatments for strep throat?

What are the potential complications of strep throat?

How can I prevent contracting strep throat?

Strep Throat Facts

[Just a Sore Throat or Strep - Slideshow](#)

[Take the Strep Throat Infection Quiz](#)

[Infectious Mononucleosis - Slideshow](#)

[Strep Throat \(Streptococcal\) Infection FAQs](#)

[Patient Comments: Strep Throat - Experience](#)

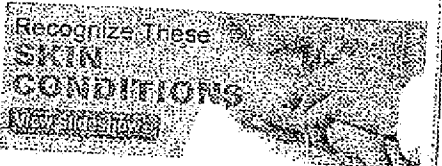
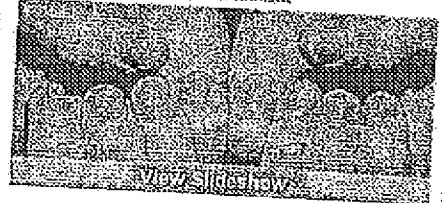
[Patient Comments: Strep Throat - Symptoms](#)

[Patient Comments: Strep Throat - Contagious](#)

[Patient Comments: Strep](#)

Psoriasis

Symptoms, Causes and Treatment



ER teams trained in listening.

Hello humankindness

 Dignity Health
 St. Rose Dominican

From WebMD

Healthy Resources

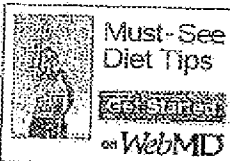
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 The Dangers of OVT
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Level of
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RxList

Pill Identifier

Quick and easy
pill identification

Use Pill Finder

Find a Pharmacy
Includes 24-hour locations

Find It Now

Drug Interaction Checker
See potential drug interactions

Check Interactions

Strep Throat Symptoms, Causes, Treatment - What are the potential complications of strep throat? - MedicineNet

certain GAS develop an immune response which may attack the joints leading to permanent arthritis. More concerning is the autoimmune response to the heart valves which may damage them and may result in heart failure. Many studies have shown that effective and appropriate antibiotic therapy for strep throat vastly reduces the likelihood of developing ARF.

Throat - Treatments
Patient Comments: Strep Throat - Diagnosis
Strep Throat (GAS) Index

Glomerulonephritis: Similar to the aberration of the immune response seen with ARF, autoantibodies may develop to the microscopic filters (glomeruli) of the kidney. This complication more commonly affects children between 7 to 10 years of age. While more common than acute rheumatic fever, glomerulonephritis carries a less ominous prognosis. Helpful therapies exist and most children make a complete recovery and do not experience long-term kidney damage. Unlike ARF, the development of glomerulonephritis is not necessarily prevented by effective antibiotic treatment.

PANDAS (Pediatric Autoimmune Neuropsychiatric Disorder Associated with Strep): Specialists debate the proposed link of a GAS infection in children with the development and/or worsening of obsessive-compulsive behaviors or tic disorder (Tourette's syndrome in the extreme). One area being researched in this controversial condition is whether antibiotic therapy affects the development of or severity of the disorder.

Medically Reviewed by a Doctor on 10/4/2013

Next: How can I prevent contracting strep throat?

PREVIOUS 1 2 3 4 5 6 7 NEXT

Strep Throat (GAS) Index

Patient Comments

Viewers share their comments.

Strep Throat - Experience

Please describe your experience with strep throat.

View 3 Comments Submit >

Strep Throat - Symptoms

Please describe the symptoms you experienced with strep throat.

View 7 Comments Submit >

Strep Throat - Contagious

Did you catch strep throat from someone else? Did you give strep throat to someone?

View 1 Comment Submit >

Strep Throat - Treatments

What home remedies soothed your strep throat symptoms and what antibiotics were prescribed for your case of strep throat?

View 3 Comments Submit >

Strep Throat - Complications

Please describe your experience with complications of strep throat.

Submit >

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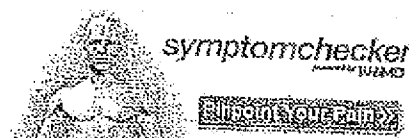
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Strep Throat - Diagnosis

How was your case of strep throat diagnosed?

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WebMD

Suggested Reading on Strep Throat by
Our Doctors

Related Diseases & Conditions

15 articles

- ♦ Infectious Mononucleosis
 - Infectious mononucleosis is a virus infection in which there is an increase of white blood cells that are mononuclear (with a single nucleus) "Mono"
- ♦ Upper Respiratory Tract Infection
 - An upper respiratory infection is a contagious infection of the structures of the upper respiratory tract, which includes the nose, nasal passages.
- ♦ Group B Strep
 - Group B strep are bacteria called *Streptococcus agalactiae* that may sometimes cause infections both in a pregnant woman and her newborn. Symptoms include
- ♦ Sore Throat
 - Sore throat can naturally develop as a result of inflammation in the throat area. It

Medications

24 articles

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Doctor's & Expert's Views

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Health News

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See All Strep Throat



Depression

Physical Symptoms of Depression



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http://www.medicinenet.com/strep_throat_gas/page6.htm#what_are_the_potential_complications_of_strep_throat

Strep Throat Symptoms, Causes, Treatment - What are the potential complications of strep throat? - MedicineNet

Hearing Aid Alternative
Testosterone Treatment
High Triglycerides?

Persistent RA Symptoms?
ED Tablet
Low T Medication

Help for Low T
Learn About Triglycerides
Erectile Dysfunction?

Lower Your Triglycerides
Bladder Control Problems
Insulin Options

Dupuytren's Disease?
Low Testosterone?
Manage Triglycerides

Health Categories:

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Diseases & Conditions
Symptoms & Signs
Procedures & Tests
Medications
Healthy Living
Vitamins & Supplements
Image Collection
Quizzes
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Pet Health

Popular Health Centers:

Allergies
Asthma
Blood Pressure
Cancer
Chronic Pain
Cold & Flu
Depression
Diabetes
Digestion
Health & Living
Healthy Kids
Hearing & Ear

Heart
HIV/AIDS
Infectious Disease
Men's Health
Mental Health
Neurology
Pregnancy
Sexual Health
Skin
Thyroid
Women's Health
More...

MedicineNet:

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Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's Skin Rash & Now She has Strep Throat!

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Sun, Feb 2, 2014 at 2:32 PM

To: Maria Daniela Perdomo 7028852853 <perdomomda@gmail.com>, Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

Last Wednesday, January 20 Mrs Burgess contacted me to let me know that Isabella did not attend to school. I called Isabella on her cellphone but she did not answer, also called you with no luck either. Finally, I called your house and talked to your father about what happened to Isabella and why she was absence. He said it was nothing serious just sore throat, I advise him to tell you to take her to the doctor. This situation, Isabella's being absence from school and you not been able to communicate the reasons for it, have been happening over and over again in the past three weeks in January alone.

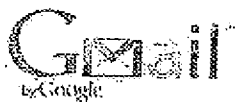
When I picked up Isabella from school last Thursday 30, she had flu symptoms, so I made an appointment for Friday 31 with Doctor Diane Goebble at Saint Rose Pediatrics. That Friday she had red skin around her eyes when I saw her after school, so I took her to the doctor as scheduled. After running some tests the diagnosis was strep throat which is a very serious and contagious infection. She was prescribed antibiotics, 10ml twice a day (morning and evening) for 10 days, I have already started the treatment and she is starting to feel a little better. As per the doctor directions, Isabella should rest and cannot be in contact with other kids for at least 48 hours after commencing the treatment. Therefore, she has been resting at home and she did not attend to her regular activities in my time.

I really do not like the way you are handling things in regard to Isabella's health during your days, I have been taking her to the doctor this past two weeks because she has been feeling sick during your days and you did nothing about it, not even take her to the doctor. Furthermore, last week when she was diagnose with severe skin rash by Doctor Dominic LaRocco at Saint Rose Pediatrics, you neglect to follow doctor's directions indicated on my email.

Finally, I am keeping her tonight, February 2, as I consider is the best way for me to follow the strep throat treatment thru at least the first two days which is vital for her recovery. Therefore, instead of coming for her tonight at 7:00pm do so tomorrow after school.

Best regards,

Maria Daniela Perdomo



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's red circles under her eyes. 1/31/14
2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>
To: Maria Daniela Perdomo 7028852853 <perdomoMDA@gmail.com>

Mon, Feb 3, 2014 at 9:45 AM

>

>

>

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>

>

>

>

> Sent from my iPhone

3 attachments



image.jpeg
103K



image.jpeg
115K

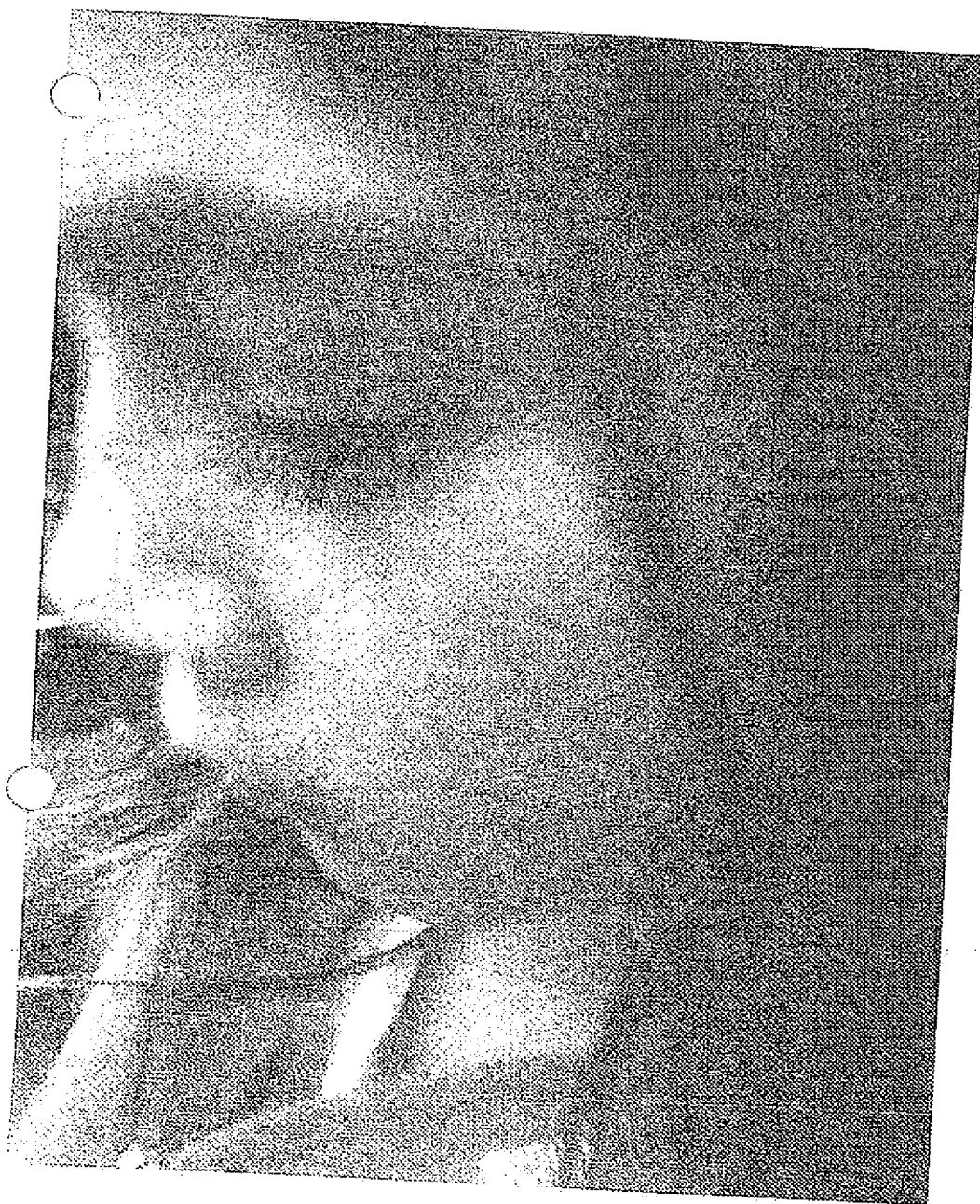


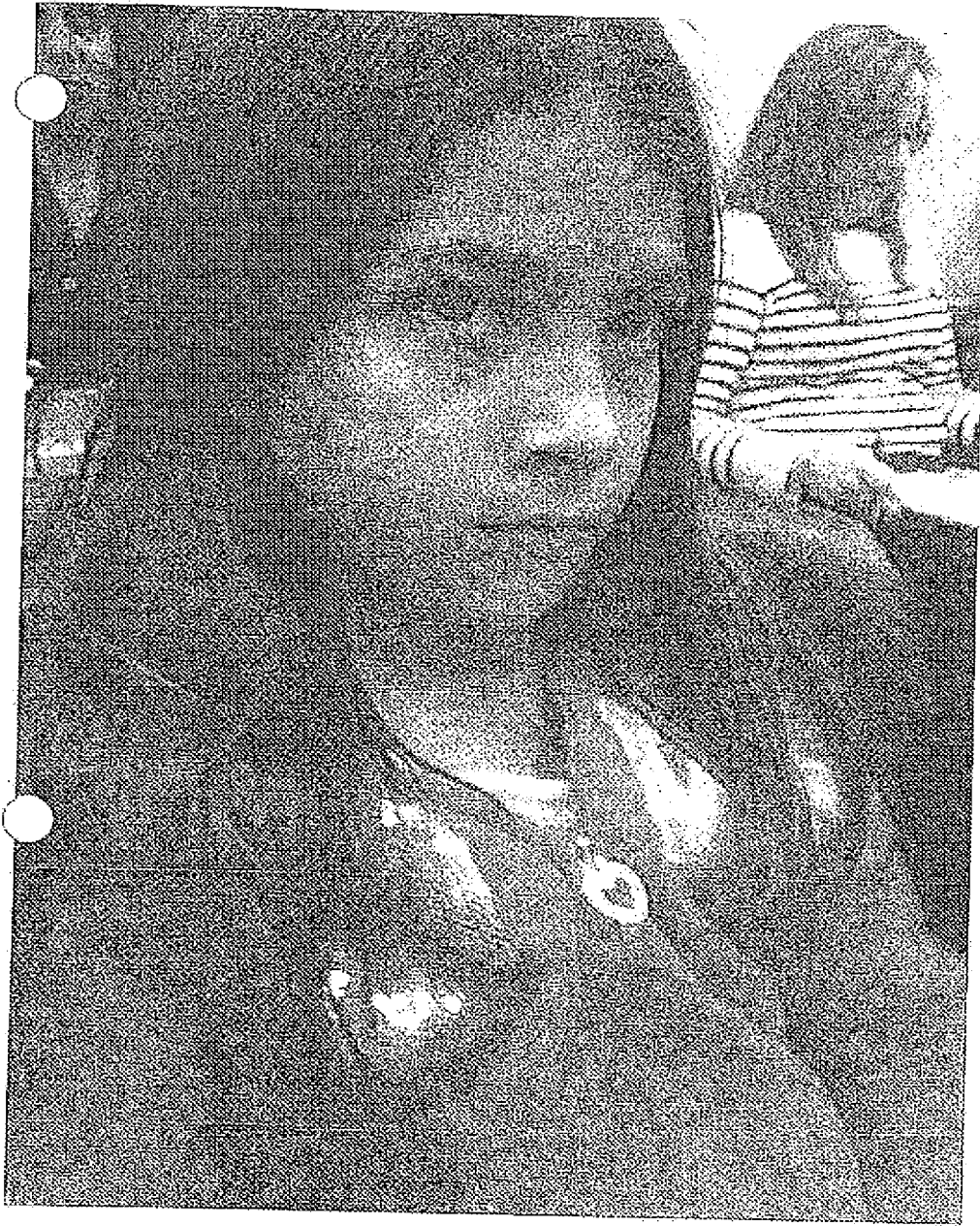
image.jpeg
91K

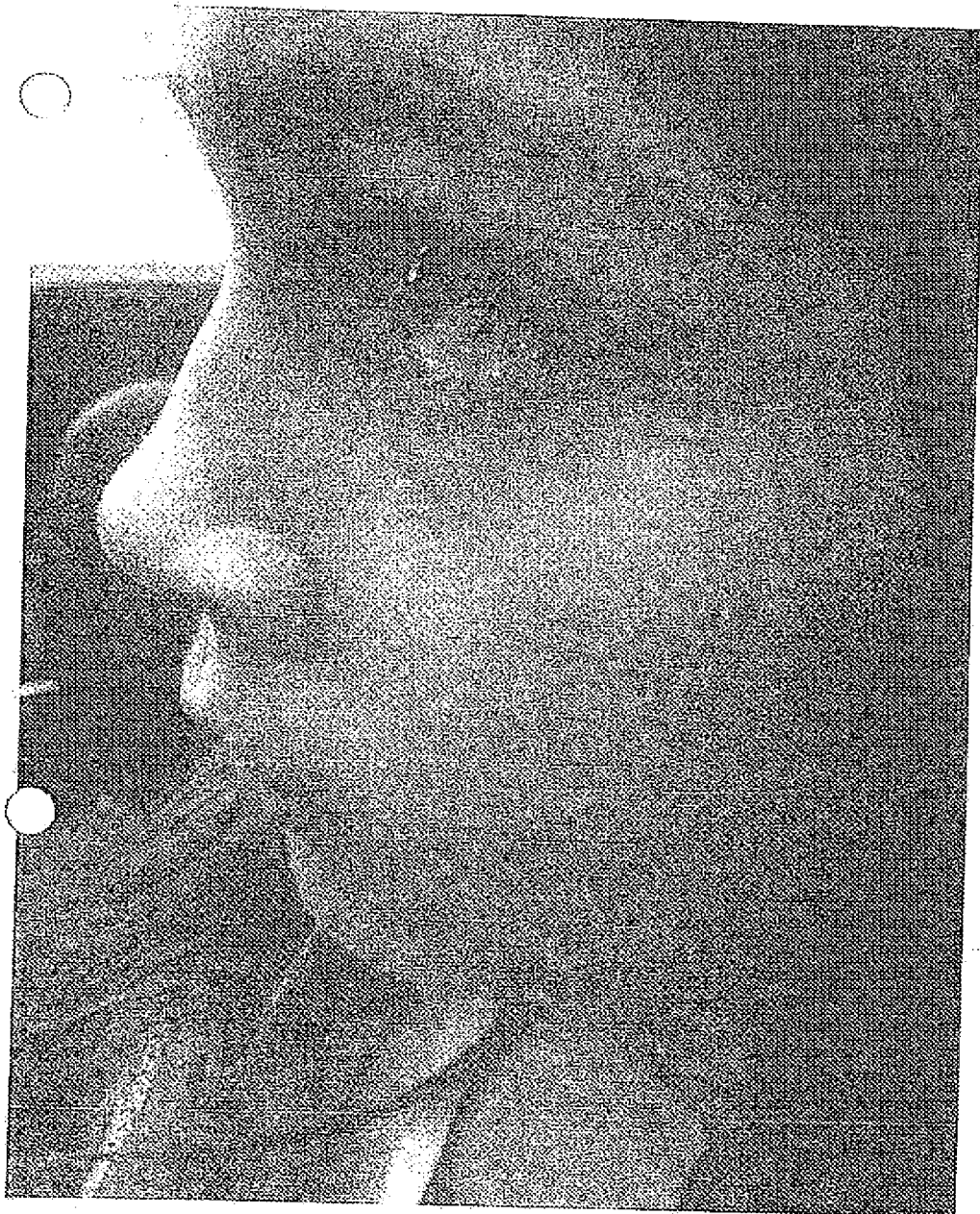
Maria Daniela Perdomo <perdomomda@gmail.com>

Mon, Feb 3, 2014 at 9:49 AM

<https://mail.google.com/mail/u/0/?ui=2&ik=b8d4715031&view=pt&search=inbox&th=143f...> 2/3/2014









Maria Daniela Perdomo <perdomomda@gmail.com>

Unable to reach Isabella

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Wesley Allen Lewis 7023401221 <info4WLEwis@yahoo.com>

Thu, Feb 6, 2014 at 8:30 AM

Cc: Maria Daniela Perdomo 7028852853 <perdomomda@gmail.com>

Wesley,

I've been trying to reach Isabella on her cell phone for the last 3 days, including this morning before she went to school. Unfortunately, I cannot seem to be able speak to her to see how she's feeling in regards to her Strep throat. I've tried calling her during different times in the day or evening with no luck and it's really frustrating; this situation is becoming quite annoying.

When she is with you, I feel she's extremely distant and disconnected from me. In fact, on Monday before I left her at school she was extremely happy, sweet, caring, and responsive. However, when she's under your care I can't seem to communicate with her freely. Therefore, it is impossible for me to know how Isabella is doing during your days. She's so disconnected that the only way I can get any information about her wellbeing is by calling the school, emailing her teacher or by speaking to her counselor at Twitchell.

It saddens me that you can be so careless to inform me about her health, school work or to even encourage her to take care of her phone.

Going back to her Strep throat condition, be sure to send back her antibiotics medication along with the ointment so I can continue with her treatment. Be aware that I will not be going to your place to pick up any medicine, Kumons, or Twitchell HW left behind as it happen last week.

Regards,

Maria Perdomo

Sent from my iPhone

Wesley Lewis <info4WLEwis@yahoo.com>

To: Maria Daniela Perdomo <perdomomda@gmail.com>

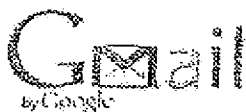
Thu, Feb 6, 2014 at 2:02 PM

Maria her phone is always accessible .. In fact she was on it many times throughout the week , I made a effort to have it charged .., which might have back fired , after getting her medication and school work and lunch in her back pack water bottle and the apple she insisted on giving Ms. Burgess .. Bella forgot her phone , I work from 5-11:30 I'll take her phone with me. You can just drive through valet and I can hand it to you , let me know

what you decide. Sorry about the inconvenience

Sent from Wesley Lewis
(Quoted text hidden)

Exhibit “12”



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's phone is off!! 9/24, 9/25

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>
To: Wesley Allen Lewis <info4WLewis@yahoo.com>

Wed, Sep 25, 2013 at 6:42 PM

Wesley,

I am trying to reach Isabella on her cellphone and it is off; as it was yesterday. I have informed you about this situation on our last email and yet the situation remains the same.

Could you please turn on the cell phone and make her call me. I would like to talk to her. Thank you

Sincerely,
Maria

Sent from my iPhone

Maria Daniela Perdomo <perdomomda@gmail.com>
To: juanfuentec@gmail.com

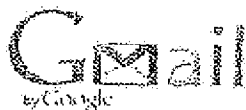
Wed, Sep 25, 2013 at 6:42 PM

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: September 25, 2013, 6:42:00 PM PDT
To: Wesley Allen Lewis <info4WLewis@yahoo.com>
Subject: Isabella's phone is off!! 9/24, 9/25

[Quoted text hidden]



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's Extracurricular Activities Time Schedule 2023-2014

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

Mon, Sep 30, 2013 at 10:02 PM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

I am writing to you in order to let you know Isabella's time schedule her Extracurricular Activities for the year 2013-2014.

All the information is shown on the pdf file attached



Please be aware that there are some extra costs for the uniforms, gear and accessories:

- All Star Competition & uniforms including shoes:
400.00 USD

- Warm up suit:
75.00 USD

- Bow and hair accessories:
20.00 USD

The following information is regarding Isabella's All Star Cheer Lakers Team, Out of State competition:

Jamz Youth Cheerleading
Competition
Date: Nov 3, 2013 | Sunday

Venue:
Six Flags Magic Mountain/Golden Bear Theatre
26101 Magic Mountain Parkway
Valencia, CA 91355

Details:
Jamz Youth Cheerleading
Group:
All Star Cheer Lakers Las Vegas

Six Flags and JAMZ invites All Star Lakers Cheer Youth, to compete at this year's Coaster Classic on Sunday, November 3, 2013. For more information and to get tickets, please contact (800) 920-4272 or log on to www.jamz.com.

If you want to attend to Isabella's outstate competition please contact Coach Delilah, from Larry Lakes Gymnastics, the contact information is shown on the chart.

Sincerely,

Maria

2 attachments

Activity	Days	Time	Location	Days	Time	Location	Days	Time	Location
Academic	Mon-Fri	7:00-8:00	Academic	Mon-Fri	8:00-9:00	Academic	Mon-Fri	9:00-10:00	Academic
Art	Sat	9:00-10:00	Art	Sat	10:00-11:00	Art	Sat	11:00-12:00	Art
Band	Mon-Fri	10:00-11:00	Band	Mon-Fri	11:00-12:00	Band	Mon-Fri	12:00-1:00	Band
Chess	Sat	12:00-1:00	Chess	Sat	1:00-2:00	Chess	Sat	2:00-3:00	Chess
Clubs	Mon-Fri	1:00-2:00	Clubs	Mon-Fri	2:00-3:00	Clubs	Mon-Fri	3:00-4:00	Clubs
Dance	Sat	3:00-4:00	Dance	Sat	4:00-5:00	Dance	Sat	5:00-6:00	Dance
Drum	Mon-Fri	2:00-3:00	Drum	Mon-Fri	3:00-4:00	Drum	Mon-Fri	4:00-5:00	Drum
Field	Mon-Fri	3:00-4:00	Field	Mon-Fri	4:00-5:00	Field	Mon-Fri	5:00-6:00	Field
Gym	Mon-Fri	4:00-5:00	Gym	Mon-Fri	5:00-6:00	Gym	Mon-Fri	6:00-7:00	Gym
Instrument	Mon-Fri	5:00-6:00	Instrument	Mon-Fri	6:00-7:00	Instrument	Mon-Fri	7:00-8:00	Instrument
Language	Mon-Fri	6:00-7:00	Language	Mon-Fri	7:00-8:00	Language	Mon-Fri	8:00-9:00	Language
Math	Mon-Fri	7:00-8:00	Math	Mon-Fri	8:00-9:00	Math	Mon-Fri	9:00-10:00	Math
Music	Mon-Fri	8:00-9:00	Music	Mon-Fri	9:00-10:00	Music	Mon-Fri	10:00-11:00	Music
Physical	Mon-Fri	9:00-10:00	Physical	Mon-Fri	10:00-11:00	Physical	Mon-Fri	11:00-12:00	Physical
Reading	Mon-Fri	10:00-11:00	Reading	Mon-Fri	11:00-12:00	Reading	Mon-Fri	12:00-1:00	Reading
Science	Mon-Fri	11:00-12:00	Science	Mon-Fri	12:00-1:00	Science	Mon-Fri	1:00-2:00	Science
Sports	Mon-Fri	12:00-1:00	Sports	Mon-Fri	1:00-2:00	Sports	Mon-Fri	2:00-3:00	Sports
Swimming	Mon-Fri	1:00-2:00	Swimming	Mon-Fri	2:00-3:00	Swimming	Mon-Fri	3:00-4:00	Swimming
Tennis	Mon-Fri	2:00-3:00	Tennis	Mon-Fri	3:00-4:00	Tennis	Mon-Fri	4:00-5:00	Tennis
Volleyball	Mon-Fri	3:00-4:00	Volleyball	Mon-Fri	4:00-5:00	Volleyball	Mon-Fri	5:00-6:00	Volleyball
Weight	Mon-Fri	4:00-5:00	Weight	Mon-Fri	5:00-6:00	Weight	Mon-Fri	6:00-7:00	Weight
Yoga	Mon-Fri	5:00-6:00	Yoga	Mon-Fri	6:00-7:00	Yoga	Mon-Fri	7:00-8:00	Yoga

Isabellas Time Schedule.jpg
73K

Isabella's Time Schedule.pdf
35K

Maria Daniela Perdomo <perdomomda@gmail.com>
To: Juan Fuente <juanfuentec@yahoo.com>

Tue, Oct 1, 2013 at 9:29 AM

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: September 30, 2013, 10:02:52 PM PDT
To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>
Subject: Isabella's Extracurricular Activities Time Schedule 2023-2014

[Quoted text hidden]

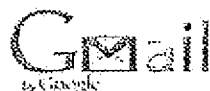
2 attachments

Activity	Days	Time	Location	Days	Time	Location	Days	Time	Location
Academic	Mon-Fri	7:00-8:00	Academic	Mon-Fri	8:00-9:00	Academic	Mon-Fri	9:00-10:00	Academic
Art	Sat	9:00-10:00	Art	Sat	10:00-11:00	Art	Sat	11:00-12:00	Art
Band	Mon-Fri	10:00-11:00	Band	Mon-Fri	11:00-12:00	Band	Mon-Fri	12:00-1:00	Band
Chess	Sat	12:00-1:00	Chess	Sat	1:00-2:00	Chess	Sat	2:00-3:00	Chess
Clubs	Mon-Fri	1:00-2:00	Clubs	Mon-Fri	2:00-3:00	Clubs	Mon-Fri	3:00-4:00	Clubs
Dance	Sat	3:00-4:00	Dance	Sat	4:00-5:00	Dance	Sat	5:00-6:00	Dance
Drum	Mon-Fri	2:00-3:00	Drum	Mon-Fri	3:00-4:00	Drum	Mon-Fri	4:00-5:00	Drum
Field	Mon-Fri	3:00-4:00	Field	Mon-Fri	4:00-5:00	Field	Mon-Fri	5:00-6:00	Field
Gym	Mon-Fri	4:00-5:00	Gym	Mon-Fri	5:00-6:00	Gym	Mon-Fri	6:00-7:00	Gym
Instrument	Mon-Fri	5:00-6:00	Instrument	Mon-Fri	6:00-7:00	Instrument	Mon-Fri	7:00-8:00	Instrument
Language	Mon-Fri	6:00-7:00	Language	Mon-Fri	7:00-8:00	Language	Mon-Fri	8:00-9:00	Language
Math	Mon-Fri	7:00-8:00	Math	Mon-Fri	8:00-9:00	Math	Mon-Fri	9:00-10:00	Math
Music	Mon-Fri	8:00-9:00	Music	Mon-Fri	9:00-10:00	Music	Mon-Fri	10:00-11:00	Music
Physical	Mon-Fri	9:00-10:00	Physical	Mon-Fri	10:00-11:00	Physical	Mon-Fri	11:00-12:00	Physical
Reading	Mon-Fri	10:00-11:00	Reading	Mon-Fri	11:00-12:00	Reading	Mon-Fri	12:00-1:00	Reading
Science	Mon-Fri	11:00-12:00	Science	Mon-Fri	12:00-1:00	Science	Mon-Fri	1:00-2:00	Science
Sports	Mon-Fri	12:00-1:00	Sports	Mon-Fri	1:00-2:00	Sports	Mon-Fri	2:00-3:00	Sports
Swimming	Mon-Fri	1:00-2:00	Swimming	Mon-Fri	2:00-3:00	Swimming	Mon-Fri	3:00-4:00	Swimming
Tennis	Mon-Fri	2:00-3:00	Tennis	Mon-Fri	3:00-4:00	Tennis	Mon-Fri	4:00-5:00	Tennis
Volleyball	Mon-Fri	3:00-4:00	Volleyball	Mon-Fri	4:00-5:00	Volleyball	Mon-Fri	5:00-6:00	Volleyball
Weight	Mon-Fri	4:00-5:00	Weight	Mon-Fri	5:00-6:00	Weight	Mon-Fri	6:00-7:00	Weight
Yoga	Mon-Fri	5:00-6:00	Yoga	Mon-Fri	6:00-7:00	Yoga	Mon-Fri	7:00-8:00	Yoga

Isabellas Time Schedule.jpg
73K

Isabella's Time Schedule.pdf
35K

ACTIVITY	INSTITUTION	LOCATION	THURSDAY	FRIDAY	SATURDAY	SUNDAY	MONTHLY COSTS
Gymnastics	Larry Lakes Gymnastics, LLC	1483 W Horizon Ridge Pkwy Henderson, NV 89012 +1 702-998-6397	6:00 - 7:00 PM	4:00 - 5:00 PM	-	-	200.00 \$
Mini Cheer			-	-	12:00 - 1:30 PM	-	
All Star Cheer			7:00 - 8:00 PM	-	10:00 - 11:00 AM	-	
Private Tutoring	Kumon Math and Reading Center of Henderson	10890 South Eastern Avenue, Suite #113, Henderson, NV 89012	2:30 - 3:30 PM	-	-	-	200.00 \$
TOTAL COSTS PER MONTH							400.00 \$



Maria Daniela Perdomo <perdomomda@gmail.com>

Library Courtesy Reminder

2 messages

do.not.reply@mypubliclibrary.com <do.not.reply@mypubliclibrary.com>

Tue, Oct 1, 2013 at 6:23 AM

Reply-To: do.not.reply@mypubliclibrary.com

To: perdomomda@gmail.com

From:

Paseo Verde Library
280 S Green Valley Parkway
Henderson, NV 89012
702-492-7252

To:

Isabella Lewis
585 Green Valley Parkway
HENDERSON, NV 89012

JUST A REMINDER: The following items are due back to the library soon. Please return to any Henderson Library, or renew the items by going to <http://www.mypubliclibrary.com>. Items may also be renewed by phone or in person. Our library locations and phone numbers can be accessed on our website at <http://www.mypubliclibrary.com/catalog/library/userdef/locations.aspx>.

Additional items from other libraries may also be due. Please check your account to verify the due dates on your outstanding items. Do not respond to this email, refer questions to reference@hdpil.org. Thanks for using Henderson Libraries.

Due Date	Title	Format	From	Renewals
10/5/2013	Oh say can you say?	Book	Paseo Verde Library	5

If you do not wish to receive this information via email, please contact the library at reference@hdpil.org.

Maria Daniela Perdomo <perdomomda@gmail.com>

Tue, Oct 1, 2013 at 9:29 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

Isabella left this book at your house. Ca you help her find it and bring it back to school on Thrusday

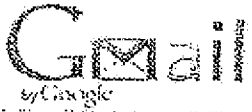
Sincerely,
Maria

Sent from my iPhone

Begin forwarded message:

From: <do.not.reply@mypubliclibrary.com>
Date: October 1, 2013, 6:23:03 AM PDT
To: <perdomomda@gmail.com>
Subject: Library Courtesy Reminder
Reply-To: <do.not.reply@mypubliclibrary.com>

[Quoted text hidden]



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's has Stomach flu symptoms

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Sat, Oct 12, 2013 at 8:58 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

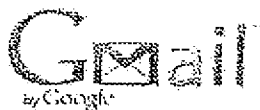
I'm writing you to inform you that Isabella has been ill since yesterday and has stomach flu like symptoms such as vomiting, muscle pains, low grade fever, and her appetite has decreased significantly. She's been resting and drinking plenty of fluids to prevent dehydration.

Due to her condition, I'm canceling her appointment with Dr. Warren, along with her gymnastics and AllStar Cheer practices.

If she doesn't feel better by Monday then I will make an appointment with her pediatrician, Dr. Heath Hodapp @ St. Rose Pediatrics.

Sincerely,
Maria

Sent from my iPhone.



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's activities for next week

3 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

Sun, Oct 27, 2013 at 5:34 PM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

I am writing to you to remind you, as we had agreed via text message, that Isabella has a mandatory cheerleading practice tomorrow from 7:00 to 8:00 pm at Larry Lakes. She has the uniform and shoes in her bag (backpack).

Also, Isabella has a book report to turn in tomorrow. We have already done it and it includes a painting/ on a canvas, so please be sure she gets it to school.

Next Thursday, she must wear a costume for school's Halloween celebration. So I am sending her Rapunzel dress and shoes for that purpose.

Finally, please do not forget about Kumons on Tuesday from 3:00-4:00 pm. The blue package is in her bag.

Regards,

Maria

Sent from my iPhone

Wesley Lewis <info4WLewis@yahoo.com>

Sun, Oct 27, 2013 at 5:54 PM

To: Maria Daniela Perdomo <perdomomda@gmail.com>

I was asked by you to take Bella to Kumons on Monday's any schedule changes would be appreciated if I was asked if the day changes will be ok .. And Larry's lakes location would be appreciated if given .. Also if possible Bella's Dr appointments on Sat .. If that could alternate to one of the days she's with me would make it possible for us both to be involved thanks Maria see you at the pumpkin patch @7:30

Sent from Wesley Lewis

[Quoted text hidden]

Maria Daniela Perdomo <perdomomda@gmail.com>

Mon, Oct 28, 2013 at 8:38 AM

To: Wesley Lewis <info4WLewis@yahoo.com>

Nothing has changed with Kumons. You can take her as early as 2:30pm on Mondays. The tutoring session should not take last more than 1 hour and half.

Larry Lakes is located on 215 and Stephanie. Cross streets are Horizon Ridge and Arroyo right behind the Albertson shopping center. Take the 215, exit Stephanie, turn right on Horizon, make a U-turn on Arroyo. Practice At 7:00pm, please arrive 10 minutes early if you can.

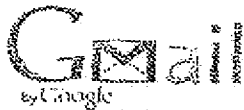
The Address is:

1483 W Horizon Ridge Pkwy, Henderson, NV

In regards to Warren, Isabella's Psychologist, Warren said that you never called him to schedule an appointment.
Based on availability, I will let you know if he can see her during the week between Monday - Wednesday.

Sincerely,
Maria

[Quoted text hidden]



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella was absent from school

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Fri, Nov 1, 2013 at 11:47 AM

To: Wesley Allen Lewis 7023401221 <info4WLEwis@yahoo.com>

Wesley,

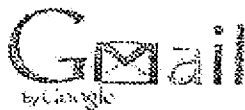
I'm writing to inform you that Isabella was absent from school today, on November 1, 2013, due to lower back pain. This morning I took her to get checked out at St. Rose Pediatrics, located at 2350 W. Horizon Ridge, Henderson NV 89052. She was seen by Dr. Diane Goebel because Dr. Heath Hodapp was not available.

Dr. Goebel said that Isabella has a small muscle spasm on her lower back from playing on the monkey bars. The Dr. Suggested for her to relax for today; to apply heat on her back and to massage the area with ice hot; in which I've already done. She also suggested for Isabella to go in a swirled pool or jacuzzi to help relax the back.

If you have any question or concerns, please feel free to contact Dr. Goebel at her office (702) 564-8556.

Best Regards,
Maria

Sent from my iPhone



Maria Daniela Perdomo <perdomomda@gmail.com>

New Address from St. Pediatrics

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

Fri, Nov 1, 2013 at 8:38 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

Im writing to inform you that that Isabella's Pediatrician, Dr. Heath Hodapp, has moved to a new location.

The new address is:

St. Rose Pediatrics
2350 W. Horizon Ridge Parkway
Henderson, NV 89052

P: (702) 564- 8556

Cross streets are: Green Valley Pkwy & Horizon Ridge

Website: www.StRosePeds.com

Sincerely,
Maria

Sent from my iPhone

Maria Daniela Perdomo <perdomomda@gmail.com>

Fri, Nov 1, 2013 at 12:15 PM

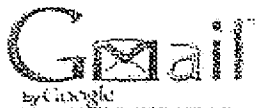
To: Maria Daniela Perdomo 7026852853 <perdomoMDA@gmail.com>

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: November 1, 2013, 8:38:50 AM PDT
To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>
Subject: New Address from St. Pediatrics

[Quoted text hidden]



Maria Daniela Perdomo <perdomomda@gmail.com>

We are moving!!

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Mon, Nov 11, 2013 at 9:36 PM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

Please be informed that my address will change effective on December 1, 2013, to the following address:

595 S. Green Valley Parkway

APT #923

Henderson, NV 89012

My telephone number remains the same: (702) 885-2853

Please update your records accordingly. Feel free to contact me for additional information. Btw, I'm happy to announce that Isabella will have her own private bedroom and bath.

Sincerely,

Maria Perdomo



Maria Daniela Perdomo <perdomomda@gmail.com>

Winter break 2013- 2014

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Fri, Dec 13, 2013 at 11:07 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

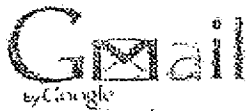
Wesley,

I am writing to you regarding the winter holidays. As I told you via SMS, I will be taking Isabella to California for Christmas.

The school vacation time starts on December 20th until January 6th, so I will have her from Dec 20th till 29th. You can pick her up that Sunday at my house around 7:30 pm.

Best regards,

Maria



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella whereabouts for this weekend?

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Sat, Jan 4, 2014 at 10:32 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Cc: Maria Daniela Perdomo 7028852853 <perdomoMDA@gmail.com>

Wesley,

I am writing to you because Isabella mention over the phone that there was a possibility of she going out of town with her grandmother this weekend. As you know we are obligated by law to inform each other when Isabella is going out of town with the other parent. I have yet now received any email from you notifying me about this trip with her grandmother, I have no address, no telephone number or any information in regards to whereabouts.

I have been trying to call her and her cellphone is off (for several days now), please provide me with the information ASAP, land line number, location, who is she staying with?

Sincerely,

Maria

Sent from my iPhone

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Maria Perdomo
Plaintiff/Petitioner

-vs-

Nashay Lewis
Defendant/Respondent

CASE NO. D-10-421054-D

DEPT. T

**FAMILY COURT MOTION/OPPOSITION
FEE INFORMATION SHEET (NRS 19.0312)**

Party Filing Motion/Opposition: ☒ Plaintiff/Petitioner ☐ Defendant/Respondent

MOTION FOR/OPPOSITION TO Modify Custody

Notice

Motions and Oppositions to
Motions filed after entry of
final Decree or Judgment
(pursuant to NRS 125,
125B & 125C)
are subject to the Re-open
Filing Fee of \$25.00, unless
specifically excluded.
(See NRS 19.0312)

Excluded Motions/Oppositions

- ☐ Motions filed before final Divorce/Custody Decree entered
(Divorce/Custody Decree NOT final)
- ☐ Child Support Modification ONLY
- ☐ Motion/Opposition For Reconsideration (Within 10 days of Decree)
Date of Last Order _____
- ☐ Request for New Trial (Within 10 days of Decree)
Date of Last Order _____
- ☒ Other Excluded Motion _____
(Must be prepared to defend exclusion to Judge)

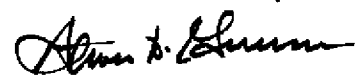
NOTE: If no boxes are checked, filing fee **MUST** be paid.

☐ Motion/Opp IS subject to \$25.00 filing fee ☒ Motion/Opp IS NOT subject to filing fee

Date: March 19, 2014

Tamara Gaffard
Printed Name of Preparer

[Signature]
Signature of Preparer



CLERK OF THE COURT

MOT
THE FINE & PRICE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT. NO. T
vs.)	
)	DATE OF HEARING: 05/01/2014
)	TIME OF HEARING: 9:30 am
WESLEY ALLEN LEWIS,)	
Defendant.)	

Motion To Modify Custody; to Enforce Order of
December 27, 2013 and an Award of Attorney's Fees

NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION/COUNTERMOTION WITH THE CLERK OF THE COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION/COUNTERMOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION/COUNTERMOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING DATE.

COMES NOW Plaintiff, MARIA DANIELA PERDOMO (formerly known as MARIA DANIELA LEWIS), by and through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price Law Group, and moves this Court for the following relief:

(1) For an award of primary physical custody of the parties' minor child;

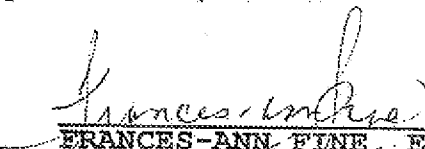
(2) To enforce the Order of December 27, 2013; and

(3) For an award of attorney's fees and costs.

This Motion is made and based upon all papers and

1 pleadings on file herein, Points And Authorities submitted
2 herewith, Plaintiff's attached affidavit, and such further evidence
3 and argument as may be adduced at the hearing of this motion.

4 DATED this 19th day of March, 2014.

5
6 
7 FRANCES-ANN FINE, ESQUIRE
8 Nevada Bar No. 25
9 The Fine & Price Law Group
Attorneys for Plaintiff
MARIA DANIELA PERDOMO

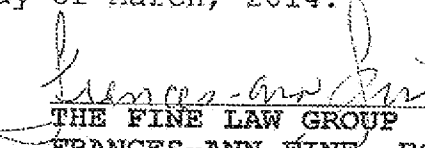
10 NOTICE OF MOTION

11 TO: WESLEY ALLEN LEWIS, Defendant;

12 TO: PATRICIA MARR, ESQ., Attorney for Defendant:

13 YOU WILL PLEASE TAKE NOTICE that the undersigned will
14 bring Plaintiff's Motion To Modify Custody; For An Order To Show
15 Cause Why Defendant Should Not Be Held In Contempt of Court and an
16 Award of Attorney's Fees on for hearing before the above-entitled
17 Court on: May 1, 2014 @ 9:30am

18 DATED this 19th day of March, 2014.

19
20 
21 THE FINE LAW GROUP
22 FRANCES-ANN FINE, ESQ.
23 Nevada Bar No. 0025
Attorney for Plaintiff
MARIA DANIELA PERDOMO

24 POINTS AND AUTHORITIES

25 I. FACTS

26 Plaintiff (hereafter "Maria") and Defendant (hereafter
27 "Wesley") were last before this Court on October 8, 2013 for
28 evidentiary hearing. After two days of proceedings, this Court
carefully analyzed the testimony and evidence presented and made

1 detailed findings and specific orders regarding the parties'
2 financial responsibilities, co-parenting issues and payment plans
3 for existing sums owed. The Court's findings, conclusions and
4 orders were formalized in the *Findings of Fact, Conclusions of Law*
5 and Order filed on December 27, 2013. **Exhibit 1.**

6 Wesley had refused to abide by a single order of this
7 Court in the five months since the evidentiary hearing, both as a
8 co-parent and financially.

9 The Court indicated in its Order that if the Defendant
10 failed to comply with any of her orders that an automatic Order to
11 Show Cause would issue. Hence, an Order to Show Cause is being
12 supplied to this Court for signature, to be heard on the date and
13 time of the underlying motion to change custody.

14 Defendant's open defiance of the orders of this Court
15 since the October 8, 2013 evidentiary hearing and the filing of the
16 Findings of Fact, Conclusions of Law and Order filed on the 27th day
17 of December, 2013 are clearly offensive and NOT in the best
18 interests of the minor child herein.

19 What is even more troubling is Wesley's continued refusal
20 to communicate and co-parent with Maria. Isabella's cellular
21 telephone remains unavailable when Maria attempts to call.
22 Homework is not being completed during Wesley's custodial time and
23 Isabella is now missing school because "she needs to care for her
24 sick father." Wesley continues to sleep with the child each night,
25 despite his assurances that he has prepared a separate room for
26 her.

27 What is truly offensive, is that Wesley is neglecting
28 Isabella's health needs and refusing to follow the directives of

1 her healthcare providers during his custodial time.

2 As stated during the evidentiary hearing, Maria hoped
3 that Wesley would truly hear the words and admonishments of the
4 Court. She sincerely hoped that a change in custody would not be
5 needed following the extensive previous litigation and specific
6 orders of the Court. However, matters have only become worse and
7 Isabella has now been diagnosed with a generalized anxiety
8 disorder. Wesley will not participate in treatment despite the
9 specific requests of her counselor. Isabella is not progressing
10 academically due to Wesley's failure to complete homework
11 assignments with her during his custodial days. She has suffered
12 through strep throat and a progressive rash without treatment due
13 to Wesley's refusal to take Isabella to the doctor or comply with
14 the doctor's instructions. At this juncture, Maria must request a
15 formal change in custody due to Wesley's obstinance and direct
16 disregard of their daughter's best interests.

17 Regarding the financial issues, Defendant was
18 specifically ordered to commence the following payments on or
19 before October 30, 2013:

20 (1) One-half of the tutoring for the minor child at
21 Kumon's (\$200.00 is owed) to be paid directly to Kumon;

22 (2) Child support in the amount of \$91.00 per
23 month;

24 (3) One-half of health insurance in the amount of
25 \$50.00 per month; and

26 (4) An arrears payment of \$100.00 per month.

27 Not one penny was received in October, November,
28 December, January or February. In fact, Plaintiff only learned

1 that Defendant made the following payments:

2 (A) On March 2, 2014 the sum of \$200.00 was
3 received by at Family Support; and

4 (B) On March 13, 2014 the sum of \$113.23 was taken
5 out of Wesley's paycheck.

6 Wesley should have paid to Kumon \$200.00. Additionally,
7 he was to pay the sum of \$546.00 as and for child support from
8 October, 2013 through March, 2014 at \$91.00 per month.
9 Additionally, he should have paid the sum of \$300.00 as and for
10 one-half of the health insurance premium that Maria has been
11 paying; and finally he was to pay on the arrears, whether or not
12 they had been determined by the Family Support Division, the sum of
13 \$600.00.

14 Summarily, Wesley is now in further arrears of \$532.77 on
15 the current monies owed since October of 2013. This figure is
16 arrived at by taking the money he should have paid commencing in
17 October, again \$91.00 a month for child support or \$546.00 plus
18 \$50.00 a month for health insurance for six month or \$300.00 a
19 month for a total of \$846.00 minus what was just received on March
20 2, 2014 and March 13, 2014, or \$313.23 which leaves an additional
21 arrearage of \$532.77, plus the previously ordered arrears. Wesley
22 has simply "thumbed his nose" at these arrears.

23 Maria has taken the most recent order to Family Support
24 and requested them to comply with this Honorable Court's directive
25 of calculating a new and updated arrears amount pursuant to her
26 order including the full amount of child support, rather than the
27 amount of child support minus the health insurance offset. This
28 was done since Wesley only had insurance for three months with

1 which to offset, and the previous schedule offset the health
2 insurance for the entire amount of time.

3 In a nutshell, other than \$313.23 Wesley is not providing
4 on a timely basis child support, health insurance, arrears or
5 tutoring. His arrears remain completely unpaid, despite the
6 monthly payment plan specifically ordered by the Court.

7 **II. CUSTODY**

8 As specifically set forth above, there is clear and
9 convincing evidence that there is a necessity to immediately change
10 custody of the minor child at issue.

11 The parties currently share joint physical custody of
12 Isabella.

13 Pursuant to Truax v. Truax, 110 Nev. 437, 438-39, 874
14 P.2d 10, 11 (1994) and NRS 125.510(2), a joint physical custody
15 arrangement may be modified or terminated by the court upon a
16 showing that it is in the child's best interest. At this juncture,
17 it is clearly in Isabella's best interest to remain in Maria's
18 primary physical custody. Isabella's educational success, health
19 care needs and struggles with mental health issues requires such a
20 modification.

21 Regarding Isabella's academics, the Court will recall
22 that she is already repeating the first grade due to her
23 educational struggles. Maria established regular communications
24 with her classroom teacher (Mrs. Burgess) and set up private
25 tutoring through Kumon. Wesley is not completing the homework
26 assignments from Kumon during his custodial time and therefore her
27 progress has not been as anticipated by the director of Kumon,
28 Scott Nuha. **Exhibit 3.** Isabella has similarly not consistently

1 completed her mandatory homework assignments for Twitchell
2 Elementary and her unfinished homework assignments continue to be
3 an area of concern with her teacher. **Exhibit 4.** Isabella's
4 performance in math has dropped significantly in January, a
5 specific academic problem area for her. **Exhibit 5.** Furthermore,
6 Isabella reported to her teacher that she was absent from school
7 because "dad was sick and she had to take care of him." **Exhibit 6.**

8 These academic issues have been compounded by Isabella's
9 emotional and behavioral troubles, which have also impacted her
10 school performance. Isabella is showing signs of anger and
11 emotional instability, lack of attention in class, having a
12 difficult time concentrating, biting herself, and hitting/kicking
13 other classmates. **Exhibit 7.** Wesley refused to communicate with
14 Maria regarding Isabella's absences or homework issues.

15 In September of 2013, Isabella started therapy at Oasis
16 Counseling Center. Her psychotherapist, Mr. Warren Wheatley,
17 immediately noted signs of depression and recommended regularly
18 weekly sessions. Wesley has been invited and encouraged to attend
19 these appointments since September 28, 2013, but he has not
20 responded to the requests of either Maria or Isabella's therapist.
21 Mr. Warren has diagnose Isabella with a generalized anxiety
22 disorder, and Wesley's refusal to participate in her treatment, is
23 detailed in his letter dated February 19, 2014. **Exhibit 7.**

24 Isabella's physical health has also suffered since the
25 last Court proceedings. Wesley has been invited to attend every
26 medical appointment made for Isabella so that he is aware of her
27 condition and each doctor's recommendations for her care. **Exhibit**
28 **8.** In January of 2014, Isabella had flu symptoms combined with a

1 general rash all over her body. Upon picking Isabella up from
2 school and noting her condition, Maria immediately made an
3 appointment with Dr. Dominic LaRocco at St. Rose Pediatrics.
4 Isabella was diagnosed with Eczema and instructions were provided
5 to decrease all skin irritants (utilize hypo-allergenic
6 soaps/detergents, no softeners/dryer sheets, short 2 minute
7 showers, no baths). **Exhibit 9.** Wesley was informed about her skin
8 condition and detailed treatment instructions were sent to him via
9 e-mail. **Exhibit 10.** Wesley did not follow these directions, which
10 caused Isabella significant emotional distress. **Exhibit 7.**

11 On January 29, 2014, Maria was informed by Isabella's
12 teacher (not by Wesley) that Isabella was absent from school.
13 Wesley did not inform Maria about the absence and he did not answer
14 his telephone call when she attempted to find out what was going
15 on. Isabella did not answer her telephone, either. Maria was
16 finally able to reach Isabella's grandfather, who explained that
17 Isabella was not feeling well, she had a sore throat, and was
18 having flu symptoms. It was apparent when Maria picked Isabella up
19 from school the following day that she was a really sick little
20 girl. A trip to the pediatrician confirmed that Isabella had strep
21 throat which required immediate antibiotics. **Exhibit 11.** It
22 remains unclear why Wesley ignored her significant symptoms which
23 clearly required a doctor's intervention.

24 Finally, Wesley has continued his pattern of non-
25 communication and refusal to co-parent or cooperate with Maria in
26 any manner. Maria has notified Wesley about doctor's appointments,
27 extracurricular activities, vacation plans, address changes,
28 Isabella's behavior and emotional issues, school performance, and

1 any other relevant topics concerning their daughter's health and
2 well-being. **Exhibit 12.** This has been predominantly one-way
3 communication, with Wesley rarely answering e-mails. He does not
4 give any feedback regarding Isabella's performance or well-being,
5 his vacation plans or activities that she is involved in during his
6 custodial time. He continues to fail to charge Isabella's cellular
7 phone in the evenings to prevent the child's direct communication
8 with Maria.

9 As an example, on February 26, 2014, Isabella was again
10 absent from school. Maria learned of the absence (again) from
11 Isabella's teacher. Maria tried to contact Isabella multiple times
12 without success, and also tried Wesley's home and cellular
13 telephone. Wesley called several hours later and stated that his
14 car had broken down, which was why Isabella had missed school. He
15 did not sound right and Maria could hear Isabella crying in the
16 background. Maria offered to pick Isabella up that evening to
17 ensure that she made it to school the next day, but Wesley refused
18 and accused Maria of trying to control the situation. When Maria
19 went to the house to confirm that Isabella was alright, no one was
20 home and Wesley continued to not answer Maria's calls. The police
21 were called to do a well-check on Isabella and they saw Wesley
22 driving by his home, apparently to avoid their visit. The officers
23 chased him down and escorted him back into the residence. They
24 explained to Wesley that he needed to communicate with Maria to
25 avoid situations like this. Wesley refused to allow Maria any
26 contact with Isabella to ensure she was alright.

27 It is respectfully submitted that a modification of
28 custody is now required to meet Isabella's educational, medical and

1 mental health needs. Wesley has been repeatedly ordered to
2 communicate with Maria, appropriately co-parent and put his
3 daughter's well-being above his own personal feelings towards
4 Maria. He simply cannot do so. Further Court orders requiring him
5 to parent Isabella appropriately can not be expected to fix the
6 situation, as he refuses to follow the multiple orders already in
7 place.

8 III. CONTEMPT

9 NRS 1.210(3) states that "[t]he Court has the power to
10 compel obedience to its orders," and NRS 22.010(3) provides that
11 "[t]he refusal to abide by a lawful order issued by the Court is
12 contempt."

13 NRS 22.100 provides:

14 Upon the answer and the evidence taken, the Court or
15 Judge or jury, as the case may be, shall determine
16 whether the person proceeded against is guilty of the
17 contempt charged, and if it be found that he is guilty of
18 the contempt, a fine may be imposed upon him not
19 exceeding \$500, or he may be imprisoned not exceeding 25
20 days, or both, but no imprisonment shall exceed 25 days
21 except as provided in NRS 22.110.

22 Plaintiff does not want the Defendant to go to jail. It
23 is not in the best interests of the minor child to know that her
24 father is being punished for his contempt, but Plaintiff does not
25 know how to otherwise get his attention. She is hopeful that this
26 Honorable Court can otherwise determine what an appropriate
27 sanction should be.

28 A. WESLEY HAS NOT PAID HIS ONE-HALF SHARE OF ISABELLA'S TUTORING

The Findings of Fact, Conclusions of Law and Order filed
on December 27, 2013 provides as follows:

IT IS HEREBY ORDERED both parties shall equally share in
the cost of BELLA's tutoring, currently with Kuman

1 Tutoring. Since Plaintiff paid for tutoring in October
2 2013, Defendant shall bear the cost of her tutoring for
3 November 2013. Commencing in December 2013, the parties
will each pay one-half the month's tutoring expense by
the due date for said payment.

4 Wesley has not made a single payment towards Isabella's tutoring
5 with Kumon. He did not pay the full \$200.00 monthly payment for
6 November, 2013, and he has not paid \$100.00 per month pursuant to
7 the Court's order for December, January, February or March. Maria
8 has paid 100% of these expenses without reimbursement. **Exhibit 2.**
9 Each of these non-payments constitutes a separate act of contempt
10 of this Court's orders.

11 **B. WESLEY HAD NOT MADE A TIMELY CHILD SUPPORT PAYMENT**

12 The *Findings of Fact, Conclusions of Law and Order* filed
13 on December 27, 2013 provides as follows:

14 **IT IS FURTHER ORDERED** that, commencing October 2013,
15 Defendant shall pay current child support to Plaintiff in
the amount of \$91.00.

16 Wesley had made no payment of \$91.00 pursuant to this Court's order
17 and only in March was there a payment made. Said payment was not
18 designated as anything, so we can only assume it was a partial
19 payment on the new arrears. He is, therefore, in contempt, at
20 least, for the months of October, November, December, January and
21 February. Maria requests a finding of contempt and sanctions for
22 each violation.

23 **C. WESLEY HAS NOT CONTRIBUTED TO THE COST OF THE CHILD'S MEDICAL
24 INSURANCE COVERAGE**

25 The *Findings of Fact, Conclusions of Law and Order* filed
26 on December 27, 2013 provides as follows:

27 **IT IS FURTHER ORDERED** that Plaintiff shall continue to
28 maintain health insurance to cover BELLA with a present
cost of same in the amount of \$100.00. Defendant shall
pay to Plaintiff one-half the cost of BELLA's health

1 insurance, or currently \$50.00 per month.

2 As with his other financial obligations to Isabella, Wesley had not
3 made a single payment towards the cost of the child's medical
4 insurance coverage. Hence \$300.00 would have been due and should
5 have been paid, but nothing was paid until March of 2014. This is
6 an additional at least either five (5) or six (6) acts (however,
7 the court wishes to characterize the minimal payments) of contempt
8 to be adjudicated by the Court.

9 **D. WESLEY HAS NOT MADE A SINGLE PAYMENT TOWARDS HIS CHILD SUPPORT**
10 **ARREARS**

11 The *Findings of Fact, Conclusions of Law and Order* filed
12 on December 27, 2013 provides as follows:

13 IT IS FURTHER ORDERED that once the Family Support
14 Division of the Clark County District Attorney's Office
15 calculates Defendant's child support arrears, including
interest and penalties, Defendant shall pay to Plaintiff
the sum of \$100.00 per month on the arrears until paid in
full.

16 Again, Wesley has not made any payment on any of his obligations
17 under the Court's order, including the payment towards his existing
18 arrears. This is an additional six (6) acts of contempt to be
19 adjudicated by the Court.

20 **E. SANCTIONS REQUESTED - EXPEDITED PROCEEDINGS AND IMPOSITION OF**
21 **WESLEY'S SUSPENDED SENTENCE**

22 This Court specifically detailed the potential
23 consequences of Wesley's continued defiance of judicial orders. He
24 was made aware that his failure to make:

25 "[A]ny one payment is a contempt of court, and Plaintiff
26 may submit an Order To Show Cause with a supporting
Affidavit/Declaration detailing the missed payment(s) to
obtain an evidentiary hearing regarding contempt."

27 Exhibit 1, page 10. Furthermore, the suspended incarceration for
28 his previous contemptuous acts would be imposed in the event of any

1 further missed payments:

2 **IT IS FURTHER ORDERED** that Defendant is sanctioned by the
3 sum of \$500.00 for each of his eleven contempts set forth
4 in the preceding paragraph for a total sanction of
5 \$5,500.00. Said sum is reduced to judgment in favor of
6 Plaintiff and may be collected by any and all lawful
7 means. The Court is also imposing a 10 day jail sentence
8 for each of the eleven contempts for a total sentence of
9 110 days. Said jail sentence is stayed, but will be
10 imposed in the event that Defendant has any future missed
11 payments to Plaintiff.

12 Maria respectfully requests this court enforce the previous
13 contempts in whatever manner she believes is just, but is not
14 certain that jail will benefit anyone. He will lose his job and
15 the ability to pay any monies. It certainly will not be in the
16 best interests of the child when she learns that her father, who
17 she continues to love, in spite of his neglect was incarcerated
18 because of her.

19 Plaintiff requests that there be expedited proceedings
20 based upon Welsey's continued non-payment.

21 Finally, Wesley has failed to pay any monies whatsoever
22 toward the attorney's fee award of \$15,000.00 and for that contempt
23 should also issue.

24 **IV. ATTORNEY'S FEES**

25 NRS 22.100 (3) provides that, in addition to the
26 penalties provided in NRS 22.100 (2) a party found in contempt of
27 court may be ordered to pay to the party seeking to enforce an
28 order that party's attorneys fees. EDCR 7.60 provides that a court
may impose as sanctions attorney fees and costs when a party "fails
or refuses to comply with an order of a judge of the court."
Additionally, NRS 125.180 specifically authorizes the awarding of

1 attorney fees and costs in addition to a judgment for arrears.

2 Based upon the foregoing authority, it is respectfully
3 requested that Maria be awarded a judgment against Wesley for her
4 attorney fees and costs incurred in the instant litigation, subject
5 to the filing of a Brunzell Affidavit setting forth the amount of
6 said fees as well as the other factors addressed in that case.

7 DATED this 19th day of March, 2014.

8
9 
10 The Fine Law Group
11 FRANCES-ANN FINE, ESQ.
12 Nevada Bar No. 0025
13 Attorney for Plaintiff
14 MARIA DANIELA PERDOMO

12 AFFIDAVIT OF MARIA DANIELA PERDOMO

13 STATE OF NEVADA)
14) ss.
15 COUNTY OF CLARK)

15 MARIA DANIELA PERDOMO, being first duly sworn, does
16 depose and state as follows:

17 1. I am the Plaintiff in the above-captioned matter,
18 and make this affidavit based upon my own personal knowledge except
19 as to those matters stated upon information and belief, and as to
20 those matters I believe them to be true.


21 2. I have reviewed the contents of this motion to which
22 this affidavit is attached, and attest that the facts stated
23 therein are true and correct.

24 3. My major concern is the best interests of our
25 daughter are not being met with the current custodial order and I
26 request this Court to comply with the standards represented in the
27 cases cited by my counsel in allowing for me to be designated as
28 the Primary Physical Custodian.

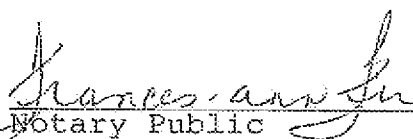
1 4. I further request that on the days that the
2 Defendant will have Isabella in his care that there be restrictions
3 to monitor her health and well-being as designated by her health
4 care providers and that if that does not occur, that he be granted
5 only supervised visitation.

6 5. Specifically, relating to the Order to Show Cause
7 issues addressed herein, Wesley has failed to pay for his one-half
8 share of Isabella's: (1) tutoring costs, (2) health insurance
9 premium, (3) his monthly child support obligation, and (4) his
10 monthly payment towards existing child support arrears. I do not
11 request Defendant be incarcerated, but I do request some
12 appropriate sanction or he will continue to ignore the Orders of
13 this Court. Since the date of our evidentiary hearing, Wesley has
14 paid only \$313.23 towards these court-ordered obligations.

15 Further Affiant sayeth naught.

16
17 
18 MARIA DANIELA PERDOMO

19 SUBSCRIBED AND SWORN to before
20 me this 19 day of March, 2014

21 
22 Notary Public

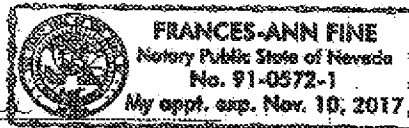
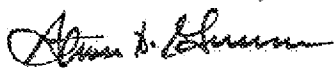


Exhibit “1”


CLERK OF THE COURT

1 ORDER
2 The Fine & Price Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 Suite 5
6 8975 South Pecos Road
7 Henderson, Nevada 89074
8 Telephone: 702/384-8900
9 Facsimile: 702/384-6900
10 fran@thefinelawgroup.com
11 Attorney for Plaintiff
12 MARIA DANIELA LEWIS nka
13 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,
11 MARIA DANIELA PERDOMO,

Plaintiff;

12 v.

13 WESLEY ALLEN LEWIS,

14 Defendant.

CASE NO: D-10-427054-D

DEPT NO: F

DATES OF HEARING: 10-8-13

TIME OF HEARING: 9:00 a.m.

15
16 Findings Of Fact, Conclusions Of Law And Order

17 THIS MATTER having come before the Court for Evidentiary
18 Hearing on August 28, 2013 and concluding on October 8, 2013 before
19 the Honorable Gayle Nathan; Plaintiff appearing personally and
20 through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price
21 Law Group; Defendant appearing personally and through his attorney,
22 PATRICIA A. MARR, ESQ., of Patricia A. Marr, Ltd; The Court having
23 considered the testimony of witnesses, the exhibits admitted at
24 trial, and the arguments of counsel; The matter having been
25 submitted for decision and the Court having issued its Minute Order
26 on October 14, 2013, the Court hereby makes the following findings
27 of fact, conclusions of law and orders:
28 / / /

RECEIVED

DEC 02 2013

FAMILY COURT
DEPARTMENT 7

FINDINGS OF FACT

1
2 1. That the parties were divorced pursuant to a Decree
3 Of Divorce filed on July 15, 2011. In said Decree the parties were
4 awarded joint legal and joint physical custody of their minor
5 child, to-wit: ISABELLA SARA LEWIS (hereafter "BELLA"), born on
6 August 10, 2006.

7 2. That the Court had previously in its Order filed on
8 July 15, 2013, set aside the Master's Recommendation And Order in
9 Case No. R-11-161532-R inasmuch as the arrears set by that Court
10 did not accurately reflect the correct arrears based upon the child
11 support that Defendant was ordered to pay.

12 3. That for the period from June 2011 through August
13 2013 Defendant's child support obligation was in the amount of
14 \$440.00 per month for each and every month save and except the
15 three months of June, July and August of 2011. For those three
16 months, Defendant's child support obligation was \$307.00 per month.

17 4. That From June 2011 forward, Defendant maintained
18 health insurance to cover the parties' minor child for only the
19 months of June, July and August of 2011. Accordingly, it was only
20 in those three months that Defendant was entitled to a \$133.00 per
21 month offset against his \$440.00 per month child support
22 obligation.

23 5. That Defendant's total child support arrears,
24 exclusive of interest and penalties, up to and including August
25 2013 are in the amount of \$9,012.38.

26 6. That Defendant's testimony that he is working only
27 26 hours per week so that he can care for the parties' minor child,
28 Bella, on his days off is not compelling to the Court as Bella is

1 now in her second year of elementary school (albeit repeating the
2 first grade).

3 7. That there was no testimony that Defendant was
4 physically or mentally impaired or disabled or unable to work.

5 8. That Defendant has a duty to financially support his
6 daughter by working a full time job as the mother of his child
7 does, and it was apparent from the testimony and other evidence
8 that he does not meet his financial obligations working 26 hours
9 per week. Based upon Defendant's continuing failure since 2011 to
10 pay his court ordered child support on a consistently monthly
11 basis, 26 hours of work per week is not sufficient to meet the
12 financial needs of his child.

13 9. That the Court accepts Plaintiff's testimony that
14 she has, at times, worked three jobs to support herself and Bella.

15 10. Whether Defendant chooses to work 40 hours per week
16 is up to him. However, the Court finds that he is wilfully
17 underemployed and is imputing another 16 hours of wages at this
18 time.

19 11. That a review of Defendant's pay stubs reflects that
20 he is paid an hourly wage of \$9.00 per hour and is paid commission
21 as well. Although his July and August 2013 pay stubs do not
22 reflect commission, his May 2013 pay stubs reflect commission.
23 Additionally, on the pay stub for pay date August 2, 2013
24 Defendant's year-to-date for commissions was \$3,069.00, resulting
25 in an average of \$438.42 per month in commission income. The Court
26 will calculate 40 hours per week at \$9.00 per hour for a gross
27 monthly salary of \$1,560.00, plus \$438.42 commissions, in arriving
28 at an imputed total gross monthly income of \$1,998.00 for

1 Defendant.

2 12. Plaintiff's gross monthly income is \$1,495.00.
3 Eighteen percent of that is \$269.00. Defendant's imputed gross
4 monthly income is \$1,998.00. Eighteen percent of that is \$360.00.

5 13. That the Court declines to modify Defendant's
6 current child support obligation retroactive to August 2012 when he
7 made application to have his child support reviewed in Child
8 Support Court. Therefore commencing October 2013 Defendant's
9 current child support obligation to Plaintiff shall be \$91.00 per
10 month.

11 14. That Plaintiff maintains health insurance to cover
12 the parties' minor child at a cost to her of \$100.00 per month, for
13 which Defendant shall have one-half responsibility.

14 15. That on the issue of credibility, Defendant
15 testified on several issues where the Court found his credibility
16 suspect, or that he was motivated to act in a manner that was
17 contrary to the best interest of his minor child, as reflected by
18 the following:

19 A. Defendant testified that his current income was
20 \$900.00 per month. The Court found his income to be, at
21 a minimum \$1,481.00 per month, when looking at the year-
22 to-date on his pay stubs (noting that the calculation
23 used to set child support uses his hours on 40 hours and
24 a sum that is equal to his average monthly commission as
25 his gross monthly). The Court finds that his testimony,
26 on his gross monthly income was not credible as it was
27 not support by the math in an analysis of his pay stubs.

24 B. Defendant testified that Plaintiff moved in with
25 someone he didn't know which "affected" him and that it
26 was hard for him to handle. The Court finds that he was
27 motivated to not cooperate or co-parent or pay his child
28 support based upon his feelings toward this third party
and Plaintiff's new relationship.

C. The Court did not find Defendant credible when he
testified that he sits down for 2 hours every day to go

1 over his first grade daughter's homework with her.

2 D. The Court did not find Defendant credible when he
3 testified that he did not know Bella was in gymnastics
4 classes or mini-cheer. It defies the Court's
5 understanding of children that Bella did not want to show
6 off her tumbling and cheer skills to her Daddy.
7 Additionally, Defendant testified that he was asked to
8 buy cheer shoes for Bella and he declined to do so. He
9 was invited to events involving cheer/gymnastics but did
10 not attend. All of this testimony undermined his
11 credibility.

12 16. That Plaintiff paid Ms. Flores, Bella's teacher last
13 school year, for eight tutoring sessions for Bella.

14 17. That Bella's attendance at the Kuman Tutoring Class
15 that is paid for by Plaintiff on Mondays immediately after school
16 is in Bella's best interest.

17 18. That the Court has concerns about co-parenting
18 issues that were not before it. These include Defendant not
19 charging Bella's telephone so that Plaintiff has daily access to
20 her daughter; Defendant not bringing Bella to Kuman Tutoring that
21 Plaintiff is paying \$200.00 per month for; Defendant ignoring the
22 activities that Plaintiff has Bella involved in and not sharing
23 with Plaintiff the activities he has Bella involved in. For these
24 reasons, Defendant is cautioned to actively engage in co-parenting
25 with Plaintiff.

26 19. That Defendant has lived with his parents since
27 August of 2012, and hence has built-in daycare when needed.
28 Defendant's rent is listed at \$300.00 per month. The Court infers
that it is unlikely Defendant would be evicted if he was late or
missed a rent payment. The Court finds that Defendant's monthly
expenses are minimal.

20. That Defendant is found to be contempt of court for

1 his non-payment of child support as follows: In 2011, for June,
2 July, August and September; In 2012, for January, May, June, July,
3 September, October and November.

4 21. That Defendant is responsible for some if not all of
5 Plaintiff's attorney fees.

6 22. That both counsel meet the *Brunzell* factors.

7 23. That Plaintiff's counsel is experienced in the
8 practice of family law and is of good professional standing. It
9 is hereby found that Plaintiff's counsel performed extensive pre-
10 evidentiary hearing preparation and said preparation and
11 performance at the evidentiary hearing was conducted in a
12 professional and thorough manner. Plaintiff is the "prevailing
13 party" as to the major issues addressed at the evidentiary hearing.

14 24. That Plaintiff incurred a total of \$24,842.87 in
15 attorney fees and costs in this post-divorce litigation through the
16 drafting of Plaintiff's Memorandum Of Fees And Costs filed on
17 November 7, 2013.

18 25. It is in Bella's best interest, and an appropriate
19 expense under NRS 125B.080(k) that both parties share in the cost
20 of Bella's tutoring as she is currently being serviced through
21 Kuman Tutoring.

22 26. Plaintiff has paid for Bella's tutoring for October
23 2013.

24 27. That if any Finding Of Fact is more properly
25 determined to be a Conclusion Of Law, then same shall be the case.

26 CONCLUSIONS OF LAW

27 1. That NRS 125.510 affords the Court with the
28 authority "during the pendency of the action, at the final hearing

1 or at any time thereafter during he minority of any of the children
2 of the marriage, make such an order the custody, care, education,
3 maintenance and support of the minor children as appears in their
4 best interest."

5 2. That NRS 125.180 provides that "when either party to
6 an action for divorce, makes default in paying any sum of money as
7 required by the judgment or order directing the payment thereof,
8 the district may make an order directing entry of judgment of the
9 amount of such arrears, together with costs and a reasonable
10 attorney's fees."

11 3. That NRS 22.010 provides that "disobedience or
12 resistance to any lawful writ, order, rule or process issued by the
13 court of judge at chambers" constitutes an "act or omission" which
14 shall be deemed a contempt.

15 4. EDCR 7.60 provides that when a party "fails or
16 refuses to comply with any order of a judge of the court",
17 sanctions may be imposed "including the imposition of fines, costs
18 or attorney's fees".

19 5. In view of the parties' joint legal and joint
20 physical custody of BELLA, the current child support obligation is
21 governed by NRS Chapter 125B and *Wesley v. Foster*, 119 Nev. 110, 65
22 P.3d 251 (2003)

23 6. That if any Conclusion Of Law is more properly
24 determined to be a Finding Of Fact, then same shall be the case.

25 Now, therefore, by reason of the foregoing,

26 / / /

27 / / /

28 / / /

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1713

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.....

1 IT IS FURTHER ORDERED that the Court declines to set
2 aside the child support order of 2011 that set Defendant's child
3 support obligation at \$440.00 per month or to make this Order
4 retroactive to August 2012 when Defendant made application to have
5 his child support reviewed in Child Support Court.

6 IT IS FURTHER ORDERED that (as Welfare is on this case)
7 the Family Support Division of the Clark County District Attorney's
8 Office in Case No. R-11-161532-R obtain a new judgment in favor of
9 Plaintiff against Defendant consistent with this Order, to-wit:
10 that Defendant was ordered to pay \$440.00 monthly in child support;
11 he was afforded an offset of \$133.00 for insurance, thus his child
12 support for the months of June, July and August of 2011 only is set
13 at \$307.00 per month. For each and every month thereafter through
14 August 2013 Defendant's current child support obligation was
15 \$440.00 per month; total child support arrears, exclusive of
16 interest and penalties, through August 2013 is \$9012.38.

17 IT IS FURTHER ORDERED that, commencing October 2013,
18 Defendant shall pay current child support to Plaintiff in the
19 amount of \$91.00.

20 IT IS FURTHER ORDERED that Plaintiff shall continue to
21 maintain health insurance to cover BELLA with a present cost of
22 same in the amount of \$100.00. Defendant shall pay to Plaintiff
23 one-half the cost of BELLA's health insurance, or currently \$50.00
24 per month.

25 IT IS FURTHER ORDERED that once the Family Support
26 Division of the Clark County District Attorney's Office calculates
27 Defendant's child support arrears, including interest and
28 penalties, Defendant shall pay to Plaintiff the sum of \$100.00 per

1 month on the arrears until paid in full.

2 IT IS FURTHER ORDERED that commencing October 2013
3 Defendant shall pay Plaintiff a total of \$241.00 per month
4 consisting of \$91.00 current child support, \$50.00 contribution
5 towards BELLA's health insurance cost, and \$100.00 for child
6 support arrears.

7 IT IS FURTHER ORDERED that Defendant shall pay Plaintiff
8 the full \$241.00 in October by October 31, 2013. Commencing
9 November 2013 and continuing until there is a wage assignment in
10 place, Defendant may pay to Plaintiff \$120.50 on the 5th day of the
11 month and \$120.50 on the 20th day of the month. A failure by
12 Defendant to make any one payment is a contempt of court, and
13 Plaintiff may submit an Order To Show Cause with a supporting
14 Affidavit/Declaration detailing the missed payment(s) to obtain an
15 evidentiary hearing regarding contempt.

16 IT IS FURTHER ORDERED that Defendant is held in contempt
17 of court for his non-payment of child support as follows: In 2011,
18 for June, July, August, September; In 2012, for January, May, June,
19 July, September, October and November.

20 IT IS FURTHER ORDERED that Defendant is sanctioned by the
21 sum of \$500.00 for each of his eleven contempts set forth in the
22 preceding paragraph for a total sanction of \$5,500.00. Said sum is
23 reduced to judgment in favor of Plaintiff and may be collected by
24 any and all lawful means. The Court is also imposing a 10 day jail
25 sentence for each of the eleven contempts for a total sentence of
26 110 days. Said jail sentence is stayed, but will be imposed in the
27 event that Defendant has any future missed payments to Plaintiff.

28 IT IS FURTHER ORDERED that Plaintiff be awarded the sum

1 of ~~4~~ 15,000 as and for attorney fees and costs, with said sum
2 reduced to judgment in favor of Plaintiff and collected by any and
3 all lawful means.

4 DATED this 20th day of December, 2013.

5
6
7 DISTRICT COURT JUDGE J. K.

8 GAYLE NATHAN
9

10 Submitted by:

11 Frances-Ann Fine
12 The Fine & Price Law Group
13 FRANCES-ANN FINE, ESQ.
14 Nevada Bar No. 0025
Attorney for Plaintiff
15 MARIA DANIELA PERDOMO
16
17
18
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21
22
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28

Exhibit “2”

KUMON

Name Tschell/Lewis

Registration Fee _____ \$ _____

Monthly Tuition _____ \$ 200

TUITION FOR YEAR

JANUARY Date Received _____ <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ _____ Balance Due: \$ _____	FEBRUARY Date Received _____ <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ _____ Balance Due: \$ _____	MARCH Date Received _____ <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ _____ Balance Due: \$ _____
APRIL Date Received _____ <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ _____ Balance Due: \$ _____	MAY Date Received _____ <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ _____ Balance Due: \$ _____	JUNE Date Received _____ <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ _____ Balance Due: \$ _____
JULY Date Received _____ <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ _____ Balance Due: \$ _____	AUGUST Date Received _____ <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ _____ Balance Due: \$ _____	SEPTEMBER 2013 Date Received <u>9/2</u> <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ <u>200</u> Balance Due: \$ <u>0</u>
OCTOBER Date Received <u>9/30</u> <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ <u>200</u> Balance Due: \$ <u>0</u>	NOVEMBER Date Received <u>10/28</u> <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ <u>200</u> Balance Due: \$ <u>0</u>	DECEMBER Date Received <u>11/25</u> <input type="checkbox"/> Cash <input type="checkbox"/> Check # _____ Amount Paid: \$ <u>200</u> Balance Due: \$ <u>0</u>

1. Registration fee due at time of enrollment.
2. Enrollment fee required if student is absent over 2 months.
3. Tuition fee is due in advance by the end of each month.

Please make check payable to: _____

KUMON

Name Isabella Lewis

Registration Fee _____ \$ _____

Monthly Tuition _____ \$ 200

TUITION FOR YEAR

~~mom~~ JANUARY 2014
Date Received 1/22
☐ Cash ☐ Check # _____
Amount Paid: \$ 200
Balance Due: \$ 0

~~mom~~ FEBRUARY 2014
Date Received 2/29
☐ Cash ☐ Check # _____
Amount Paid: \$ 200
Balance Due: \$ 0

MARCH

Date Received _____
☐ Cash ☐ Check # _____
Amount Paid: \$ _____
Balance Due: \$ _____

APRIL

Date Received _____
☐ Cash ☐ Check # _____
Amount Paid: \$ _____
Balance Due: \$ _____

MAY

Date Received _____
☐ Cash ☐ Check # _____
Amount Paid: \$ _____
Balance Due: \$ _____

JUNE

Date Received _____
☐ Cash ☐ Check # _____
Amount Paid: \$ _____
Balance Due: \$ _____

JULY

Date Received _____
☐ Cash ☐ Check # _____
Amount Paid: \$ _____
Balance Due: \$ _____

AUGUST

Date Received _____
☐ Cash ☐ Check # _____
Amount Paid: \$ _____
Balance Due: \$ _____

SEPTEMBER

Date Received _____
☐ Cash ☐ Check # _____
Amount Paid: \$ _____
Balance Due: \$ _____

OCTOBER

Date Received _____
☐ Cash ☐ Check # _____
Amount Paid: \$ _____
Balance Due: \$ _____

NOVEMBER

Date Received _____
☐ Cash ☐ Check # _____
Amount Paid: \$ _____
Balance Due: \$ _____

DECEMBER

Date Received _____
☐ Cash ☐ Check # _____
Amount Paid: \$ _____
Balance Due: \$ _____

1. Registration fee due at time of enrollment.
2. Enrollment fee required if student is absent over 2 months.
3. Tuition fee is due in advance by the end of each month.

Please make check payable to: _____

Mom's credit card is used
for auto pay every month. Amen

Exhibit “3”



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's Progress in Kumon's

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Fri, Jan 17, 2014 at 12:34 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Cc: Maria Daniela Perdomo 7028852853 <perdomoMDA@gmail.com>

Wesley,

I am concern about Isabella's math progress in the kumon's program. She does not seem to be able to advance in addition.

I have talked to Scott about this matter, and he pointed out the importance of consistency during this part of her learning process, as well as the relevance of math for her future. We both need to cooperate with Isabella's homework in order for her to advance.

There have been a few weeks now, since I have been noticing that Isabella is not completing her homework during parenting time. As Scott pointed out, this is extremely important for her. So please, in your daughter's best interest, commit yourself to help her complete Kumons homework. Be sure it is turned in every Monday when you drop her off.

Regards,

MariaDaniela Perdomo

Sent from my iPhone

Exhibit “4”

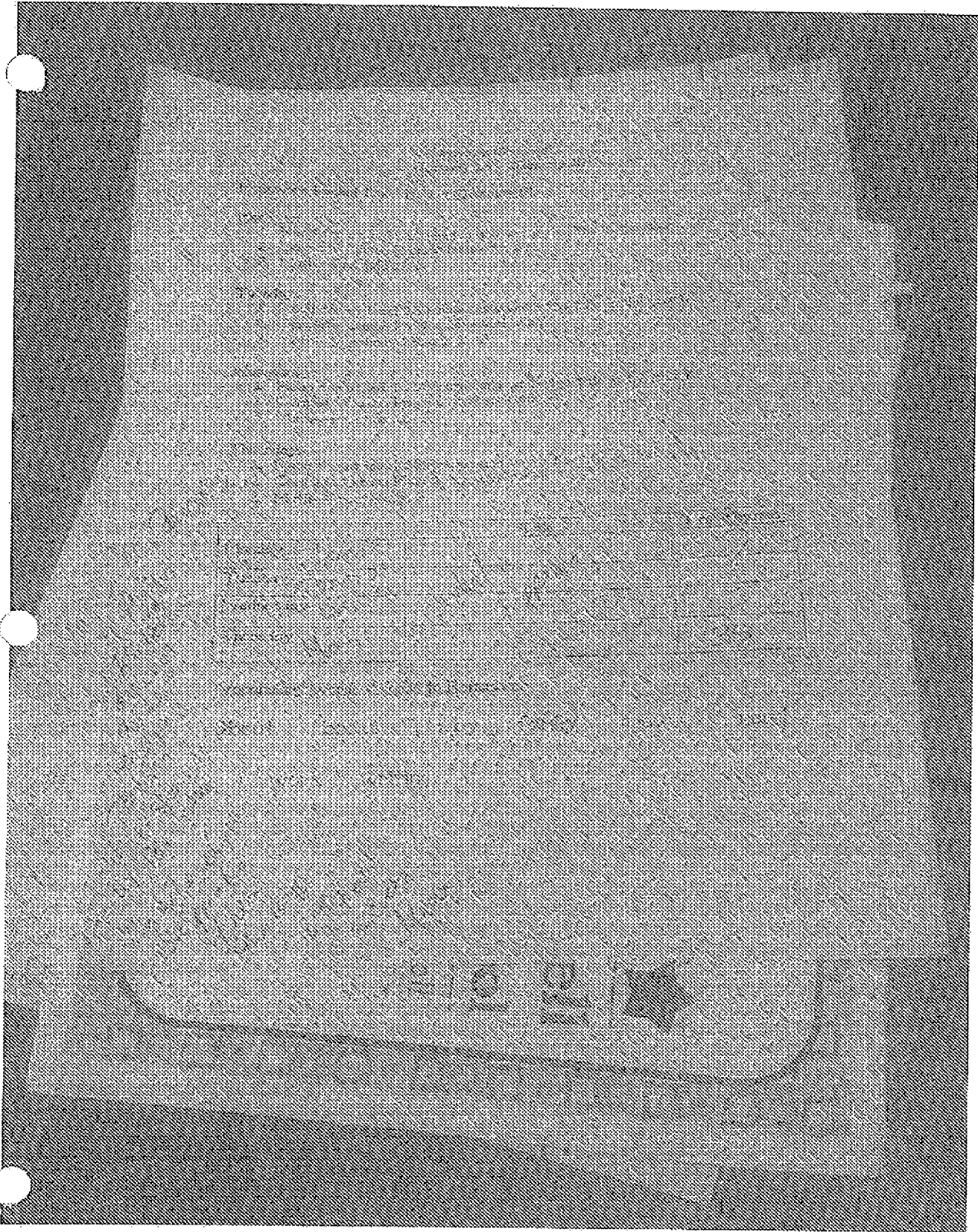


Exhibit “5”

	Trimester 1	Trimester 2	Trimester 3	Final
Reading	A 97%	B 88%		
Writing	A 94%	A 94%		
Language	A 95%	B 87%		
Speaking and Listening	A 93%	A 93%		
Mathematics	A 90%	B 84%		
Science/Health	A 100%	A 95%		
Social Studies	A 99%	A 99%		
Special Subject				
Art	Satisfactory progress	Satisfactory progress		
Humanities	Satisfactory progress	Exceptional progress		
Library	Exceptional progress	Exceptional progress		
Music	Exceptional progress	Exceptional progress		
PE	Exceptional progress	Exceptional progress		
Successful Learner Behaviors				
Observes School Rules	Exceptional progress	Exceptional progress		
Follows Classroom Rules	Exceptional progress	Satisfactory progress		
Follows Directions	Satisfactory progress	Satisfactory progress		
Accepts Responsibility	Satisfactory progress	Satisfactory progress		
Works Independently	Exceptional progress	Exceptional progress		
Works Cooperatively	Exceptional progress	Exceptional progress		
Completes and Returns Homework on Time	Satisfactory progress	Satisfactory progress		
Quality of Work	Exceptional progress	Exceptional progress		
Affendance Record				
Days Absent	2	5		
Times Tardy	6	8		
Days Present	63	53		

Learner Progress Scales	Knowledge of Work - Overall summary grade for content area. A- 90-100% mastery of grade level standard B- 80-89% mastery of grade level standard C- 70-79% mastery of grade level standard D- 60-69% mastery of grade level standard F- Below 60% mastery of grade level standard W- Working on standards below grade level (see attachment)	Special Subjects and Learner Behaviors Exceptional progress Satisfactory progress Needs improvement
--------------------------------	---	---

Teacher Comments - 1st Trimester

Isabella scored 53 wpm on the AIMSweb assessment, which is above-grade level. In order to challenge her, she is currently reading beginner chapter books with her reading group. We have discussions about the plot, characters, and setting and she is able to contribute to the group. She enjoys reading to the class and picks out wonderful books we like to hear. Occasionally, Isabella needs reminders to complete unfinished school work or centers in her desk folder. She can work on being more responsible by completing this in a more timely manner and without being told. Isabella is a kind, polite girl who consistently follows directions and classroom rules. She is also a straight-A student.

Teacher Comments - 2nd Trimester

This trimester, Isabella scored 112 wpm on the AIMSweb assessment, which is well-above grade level. Her reading group continues to read beginner chapter books and has discussions about what was read. She continues to show enthusiasm with reading to the class. Lately, Isabella has had a difficult time answering questions during Saxon Phonics and can be easily distracted. Many times throughout the day, I will catch her looking from behind, while she is supposed to be completing assignments at her desk. She requires more time to complete seat work compared to others and needs redirection. Isabella takes pride in her writing and completes amazing illustrations. She shows a lot of passion with art. She lights up and is excited to share her accomplishments with classmates. Isabella is an A-B Honor Roll student.

Teacher Comments - 3rd Trimester

Teacher's Signature

	Trimester 1	Trimester 2	Trimester 3	Final
Reading	A 97%			
Writing	A 94%			
Language	A 95%			
Speaking and Listening	A 93%			
Mathematics	A 90%			
Science/Health	A 100%			
Social Studies	A 99%			
Special Subject				
Art	Satisfactory progress			
Humanities	Satisfactory progress			
Library	Exceptional progress			
Music	Exceptional progress			
PE	Exceptional progress			
Successful Learner Behaviors				
Observes School Rules	Exceptional progress			
Follows Classroom Rules	Exceptional progress			
Follows Directions	Satisfactory progress			
Accepts Responsibility	Satisfactory progress			
Works Independently	Exceptional progress			
Works Cooperatively	Exceptional progress			
Completes and Returns Homework on Time	Satisfactory progress			
Quality of Work	Exceptional progress			
Attendance Record				
Days Absent	2			
Times Tardy	6			
Days Present	63			

**Learner
Progress
Scales**

Knowledge of Work - Overall summary grade for content area.
A- 90-100% mastery of grade level standard
B- 80-89% mastery of grade level standard
C- 70-79% mastery of grade level standard
D- 60-69% mastery of grade level standard
F- Below 60% mastery of grade level standard
W- Working on standards below grade level (see attachment)

Special Subjects and
Learner Behaviors
Exceptional progress
Satisfactory progress
Needs improvement

Teacher Comments - 1st Trimester

Isabella scored 53 wpm on the AIMSweb assessment, which is above-grade level. In order to challenge her, she is currently reading beginner chapter books with her reading group. We have discussions about the plot, characters, and setting and she is able to contribute to the group. She enjoys reading to the class and picks out wonderful books we like to hear. Occasionally, Isabella needs reminders to complete unfinished school work or centers in her desk folder. She can work on being more responsible by completing this in a more timely manner and without being told. Isabella is a kind, polite girl who consistently follows directions and classroom rules. She is also a straight-A student.

Teacher Comments - 2nd Trimester

Teacher Comments - 3rd Trimester

Teacher's Signature

Mom's

STUDENT PROGRESS REPORT

Monday, November 25, 2013

Lewis, Isabella

Ms. Burgess

Twitchell Elementary School

Grade Summary	Overall
Language	1235/1300 = 95% A
• Category: NA	1235/1300 = 95% A
Mathematics	1806.43/2000 = 90% A
• Category: NA	1806.43/2000 = 90% A
Reading	2606.33/2700 = 97% A
• Category: NA	2606.33/2700 = 97% A
Science/Health	750/750 = 100% A
• Category: NA	750/750 = 100% A
Social Studies	1190/1200 = 99% A
• Category: NA	1190/1200 = 99% A
Speaking and Listening	380/400 = 95% A
• Category: NA	380/400 = 95% A
Writing	1220/1300 = 94% A
• Category: NA	1220/1300 = 94% A

Follows classroom rules

E

S

N

Follows directions

E

S

N

Accepts responsibility

E

S

N

Works independently

E

S

N

Quality of work

E

S

N

Mom's

STUDENT PROGRESS REPORT

Friday, December 20, 2013

Lewis, Isabella

Ms. Burgess
Twitchell Elementary School

Grade Summary	Overall
Language	200/200 = 100% A
• Category: NA	200/200 = 100% A
Mathematics	100/100 = 100% A
• Category: NA	100/100 = 100% A
Reading	564/600 = 94% A
• Category: NA	564/600 = 94% A
Science/Health	100/100 = 100% A
• Category: NA	100/100 = 100% A
Social Studies	200/200 = 100% A
• Category: NA	200/200 = 100% A
Writing	200/200 = 100% A
• Category: NA	200/200 = 100% A

Follows classroom rules

E

S

N

Follows directions

E

S

N

Accepts responsibility

E

S

N

Works independently

E

S

N

Quality of work

E

S

N

Starting to talk during
seatwork more / disruptive

- getting out of seat
during lessons taught

Dear Parents,

This progress report does not reflect a complete picture of your child's ability and progress. These grades will go up and down as the trimester continues and more grades are entered. You may keep this copy.

Mom's

STUDENT PROGRESS REPORT
Friday, January 31, 2014

Lewis, Isabella

Ms. Burgess
Twitchell Elementary School

Grade Summary	Overall
Language	874.19/1000 = 87% B
• Category: NA	874.19/1000 = 87% B
Mathematics	637.61/800 = 80% B
• Category: NA	637.61/800 = 80% B
Reading	1862.33/2000 = 93% A
• Category: NA	1862.33/2000 = 93% A
Science/Health	680/700 = 97% A
• Category: NA	680/700 = 97% A
Social Studies	490/500 = 98% A
• Category: NA	490/500 = 98% A
Speaking and Listening	200/200 = 100% A
• Category: NA	200/200 = 100% A
Writing	760/800 = 95% A
• Category: NA	760/800 = 95% A

Follows classroom rules

E

S

N

Follows directions

E

S

N

Accepts responsibility

E

S

N

Work on getting work done in time given.
Thx!

Works independently

E

S

N

Quality of work

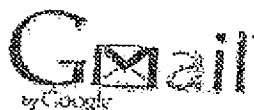
E

S

N

You may keep this copy.

Exhibit “6”



Maria Daniela Perdomo <perdomomda@gmail.com>

Incomplete HW

4 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

To: "Sarah R.U.T. Burgess" <sburgess@interact.ccsd.net>

Fri, Jan 17, 2014 at 12:52 AM

Hi Mrs Burgess,

I am writing to you because I have noticed by reviewing the homework log, that Isabella it is not completing her reading portion of the homework while she is with the father. She expressed that her father is not helping her with it and that seems to really upset her. However, she's too scared/shy to say anything.

I have noticed she has a lack of interest in reading which is odd because as you already know, she loves to read! Also, she is having a hard time focusing when doing math.

Have you noticed anything different while she in class. Apparently she was absent from school last week and I wasn't informed either.

Could you please give me some feedback on her performance in class.

Thanks in advance for your help.

Sarah R.U.T. Burgess <sburgess@interact.ccsd.net>

To: perdomomda@gmail.com

Fri, Jan 17, 2014 at 7:21 AM

Hi Maria,

Yes, I am glad you emailed me. Recently in the last couple weeks, I have noticed a change in her school performance. For example, I have been constantly telling her to work faster and make sure she's completing her work on time. Luckily, she does complete the rest during student/teacher read aloud, but is still easily distracted by it that I've had to put her in the pod to get it done. During class at times, I have had to sit her at the reading table by herself, so she doesn't get distracted by others in her group and complete her work.

I've also noticed, she's having a difficult time answering questions during Saxon Phonics. I make sure to review these concepts over so she doesn't get behind. She missed last Wednesday and I had written that on her last week's homework packet. I meant to sent it home (yesterday) Thursday for you to see, but my days this week in my head were all messed up, so I think I sent it home Wed. instead! My apologies, because I did want you to see that. Isabella told me dad was sick and had to take care of him. I sent home a blue Decodable for book for her to read and return Friday. Again, I meant for you to get it but believe I sent it home Wed. instead. Hopefully, you saw it and can return it today.

Please let me know if there's anything else I can do! Isabella is a wonderful, sweet girl who can achieve so much! I would hate for her to fall behind in school.

Thanks so much for your concern,
S. Burgess

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Juan Fuente <juanfuentec@gmail.com>, palamidis@hotmail.com

Fri, Jan 17, 2014 at 2:22 PM

Sent from my iPhone

Begin forwarded message:

From: "Sarah R.U.T. Burgess" <sburgess@interact.ccsd.net>
Date: January 17, 2014 at 7:21:19 AM PST
To: perdomomda@gmail.com
Subject: Re: Incomplete HW

[Quoted text hidden]

Juan Fuente <juanfuentec@gmail.com>
To: Maria Daniela Perdomo <perdomomda@gmail.com>

Fri, Jan 31, 2014 at 10:37 PM

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: 17 de enero de 2014 14:22:43 GMT-8
To: Juan Fuente <juanfuentec@gmail.com>, palamidts@hotmail.com
Subject: Fwd: Incomplete HW

[Quoted text hidden]

Exhibit “7”



2360 W. Horizon Ridge Parkway, Ste 120
Henderson, NV 89052
(702) 294-0433
www.oasiscounselingtoday.com

Re: Isabella Sara Lewis

DOB: 08.10.2006

Date: February 19, 2014

To: Frances-Ann Fine

The Fine & Price Law Group

8975 S. Pecos Rd, Suite 5

Henderson, Nevada 89074

Ms. Fine

I am writing this letter in response to your request to provide any clinical information as it relates to the parties' minor child, Isabella Sara Lewis born 08.10.2006, as I have been seeing her in individual therapy.

I have seen Isabella in individual and family therapy with mom since 09.21.2013. I have seen her for a total of 15 sessions as of this date.

I have diagnosed Isabella with a clinical diagnosis of generalized anxiety disorder based on DSM IV-TR criteria. From my findings, observations, and client verbalizations, she has felt in the middle between her mom and biological dad. At the start of therapy Isabella reiterated on several occasions that she wanted a mom and dad, but not where they were fighting all the time. I have been addressing her anger at both school and at home, which was the initial reason client was presented here at Oasis counseling.

In the course of treatment, I have found Isabella to be a very friendly and likeable child who is very pre-occupied about pleasing others, but at the same time having underlying control issues. I have seen her interactions with the mom, which have been very positive, but occasionally angry, especially when we discussed the breakup of the family system. I have used Cognitive therapy, mixed with play therapy, and using art as a vehicle to help her explain feelings in a safe environment. At first she was very quiet when talking about the father and the grandmother. She stated "I have to be extra good because I don't want to get in trouble over there, or for grandma to use the spoon on me." There was a strong effort by Isabella to protect the father. Note she has never stated that she disliked him, but did state that when she goes to his house she gets bored because the dad does not play with her like mom does.

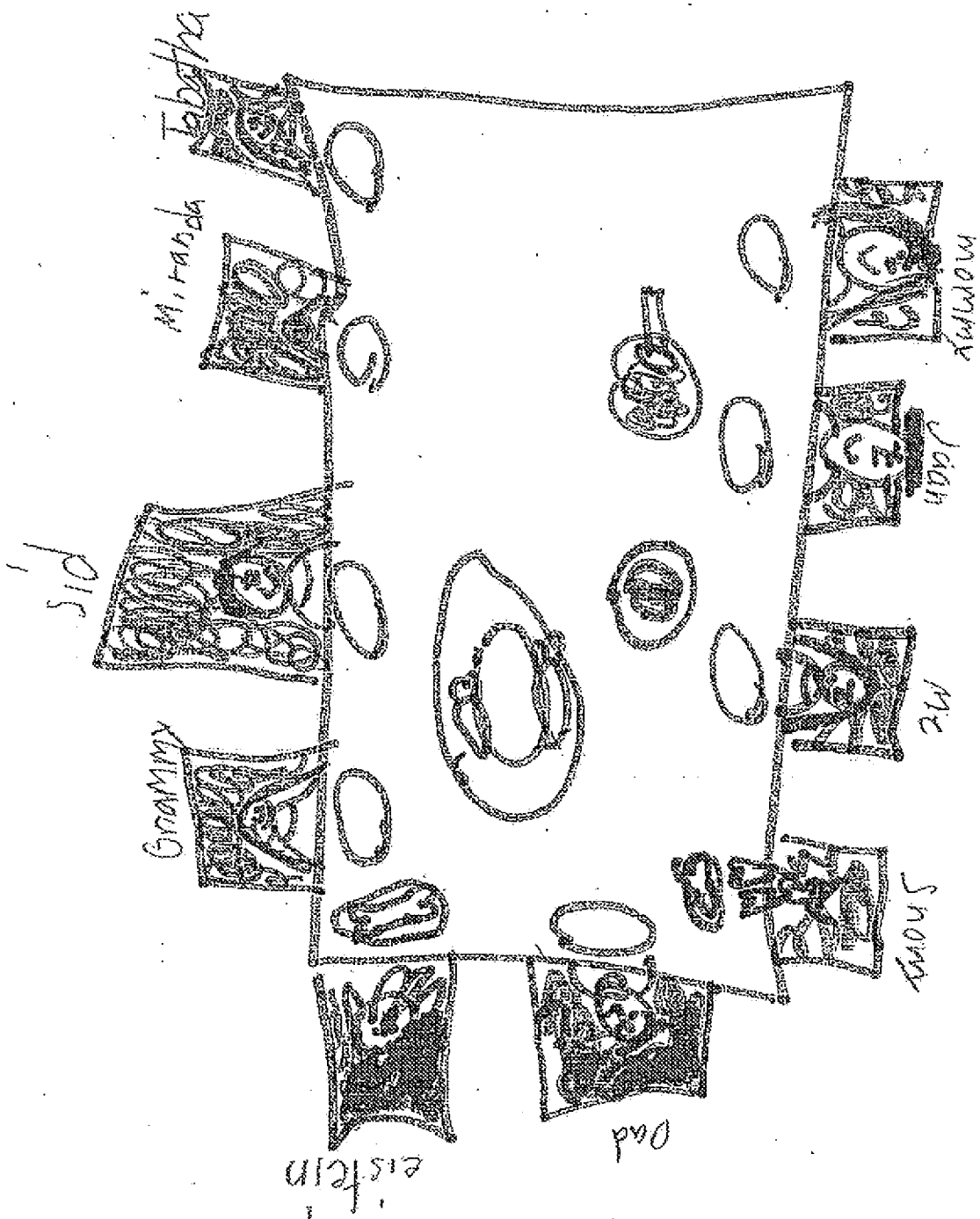
On several occasions I tried to get the father to come in to therapy with his daughter, including leaving a message. To no avail he did not respond. My goal was to view the interactions with my client and her father, to look closely at the interaction as well as to illicit the father's help in making sure she was not being placed in the middle on either a covert or overt level. I was concerned because on three occasions it was reported by the mom, and my client that she was ill, and dad did not take care of her. My client stated, he did not put the medicine on her like mom did. It was also reported that the father did not follow through getting her to the doctor, or calling mom about medical concerns. In two weeks my client went from having a rash on her to having strep throat, which may have been the result of neglect. It was also during this same period that I noticed an increase in anger from Isabella, which had been reduced for some time. The anger did escalate to the point she had hit the mom and mom's boyfriend. It was during this period that client became much quieter, and did not want to discuss any family issues. During play therapy she did verbalize how she would punish people by taking their family away.

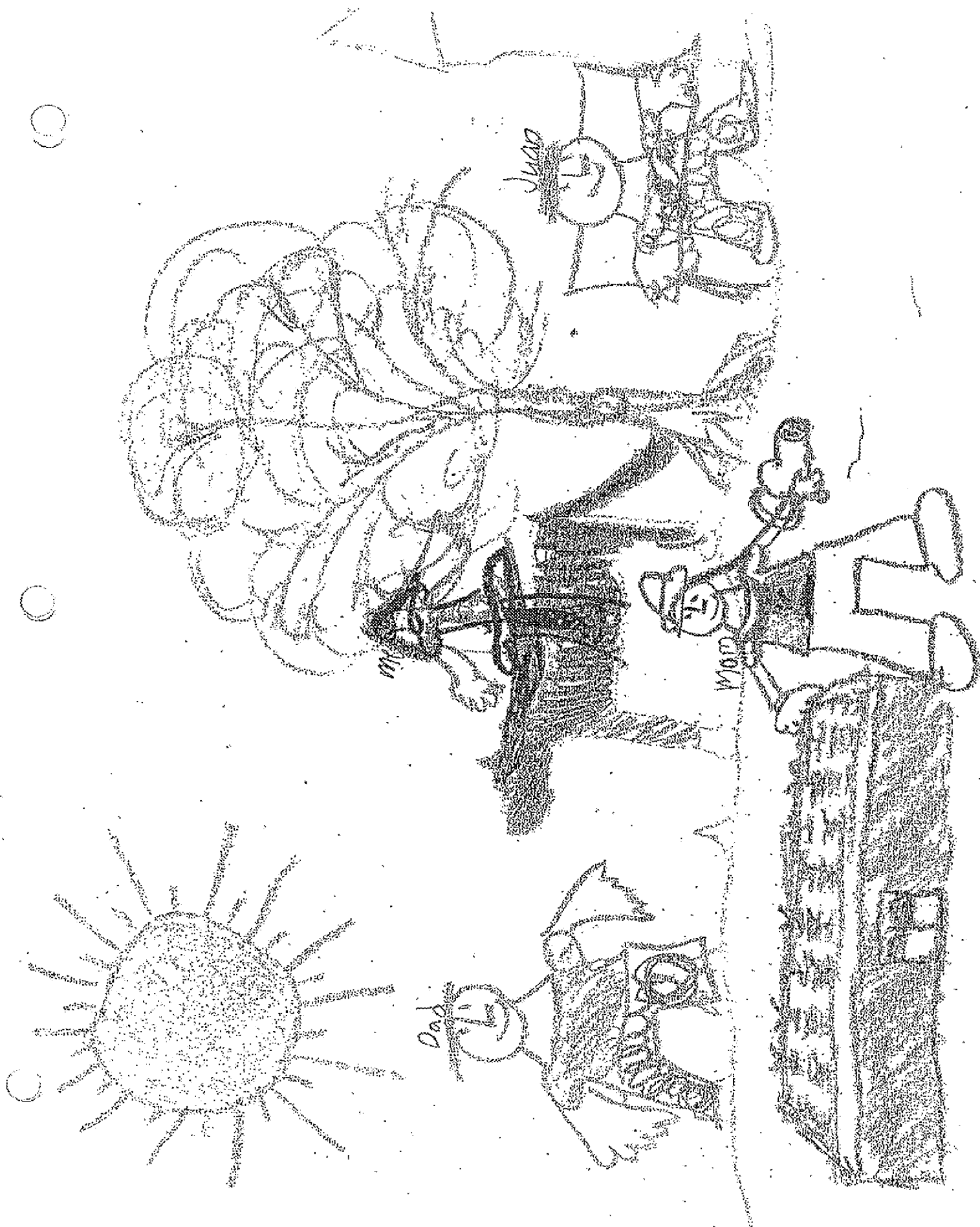
In the last session, Isabella seemed much happier. Stated she liked being around her mom and mom's boyfriend because they "did more with her." During the last session she drew a picture which showed that she, mom and mom's boyfriend were more isolated from her dad. Mom stated that this week Isabella had requested not to go over to dad's this week. Isabella would not address this comment.

In closing I find that Isabella continues to be in the middle, and is still grieving over mom and dad's breakup. Currently I am working on having her adjust to the situation, as a month ago she seemed much happier, and I suggested to mom that since things were going better that perhaps we could reduce the amount of time she is coming into therapy. I changed this once the anger and physical aggression increased. Again, I will reiterate, that it was the time she became physically ill with strep throat that her emotions of stress and anger resurfaced. The anger at school has just recently been reduced, as I have been working with her with anger management and effective communication. It is very important that Isabella feel safe, and not have to take any responsibility for how others deal with their feelings.

Sincerely


Warren Wheatley ACSW, LCSW, DCSW





MAKE CHECKS PAYABLE TO:

Oasis Counseling, LLC
2360 W Horizon Ridge Pkwy Ste 120
Henderson, NV 89052

7022940433

STATEMENT DATE 2/5/2014	PAY THIS AMOUNT (\$100.00)	ACCOUNT # 2071
PATIENT: Lewis, Isabella		

STATEMENT

Perdomo, Maria
595 South Green Valley Pkwy
henderson, NV 89012

DOS	Pra	Insurer	CPT	Descrip.	Charge	Adjustm	Ins. Paid	Pat. Paid	Ins. Bal	Pat. Bal
9/21/2013	Wheatley PEBP	MH	90791		\$300.00	\$200.00	\$0.00	\$100.00	\$0.00	\$0.00
9/28/2013	Wheatley PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
10/5/2013	Wheatley PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
10/19/2013	Wheatley PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
10/26/2013	Wheatley PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
11/16/2013	Wheatley PEBP	MH	90834	45 minute	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
11/23/2013	Wheatley PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
12/7/2013	Wheatley PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
12/21/2013	Wheatley PEBP	MH	90834	45 minute	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
1/3/2014	Wheatley PEBP	MH	90847	Family	\$250.00	\$150.00	\$0.00	\$100.00	\$0.00	\$0.00
1/11/2014	Wheatley PEBP	MH	90834	45 minute	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
1/18/2014	Wheatley PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
1/25/2014	Wheatley PEBP	MH	90837	60 minutes	\$200.00	\$100.00	\$0.00	\$100.00	\$0.00	\$0.00
2/1/2014	Wheatley PEBP	MH	90834	45 minute	\$200.00	\$0.00	\$0.00	\$0.00	\$200.00	\$0.00
Patient Balance										\$0.00
Unassigned Balance										(\$100.00)
PATIENT BALANCE AMOUNT										(\$100.00)

RECEIPT

Transaction ID: 2836253
Transaction Date: 01/31/2014

Received from: Maria Perdomo

\$ 406.06

For: DOS: 1/3, 1/11, 1/18, 1/25 \$ 2/1

Method: ☐ Cash ☐ Check ☒ Credit Card ☐ Other

Card Type: Master Card

Acct. No.: *****8456

Auth. No.: 27411Z

I agree to pay above total amount according to card issuer agreement.


Sig.: _____

Date: _____

Received By: Karina

Maria Perdomo

Oasis Counseling, LLC



Oasis Counseling LLC

Warren Wheatley, ACSW, LCSW
Licensed Clinical Social Worker
Psychotherapist

2360 W. Horizon Ridge Pkwy.
Suite 420
Henderson, NV 89052

Phone: (702) 274-6430
Fax: (702) 446-8363
oasiscounseling@gmail.com
www.oasiscounselingllc.com

Services

Anxiety & Mood Disorders

Assessment and treatment of Anxiety and Depressive Disorders.

- Panic Disorder
- Post Traumatic Stress
- Generalized Anxiety
- Obsessive-Compulsive
- Social Anxiety Disorder
- Major Depression
- Bi-Polar Depression
- Short term Depression
- Grieving Loss
- Phobias

Medical Psychotherapy

Serving patients who are dealing with psychological effects on physical/medical condition and vice versa. Specialists assessing and counseling all age groups coping with the effects of acute and chronic illness and life threatening conditions.

- Cancer
- Heart Disease
- Kidney Disease
- Fibromyalgia
- Diabetes
- Arthritis
- Hypochondriasis
- Pain Management
- Post Partum Depression
- Chronic Health Issues
- PMS
- Weight Management
- Smoking Cessation
- Stress Management

Couples & Family Counseling

Direct and sensitive treatment of issues affecting couples and/or families.

Child/Adolescent Counseling

Providing a broad range of services for children and adolescents experiencing learning, motivational, behavioral, emotional, or social adjustment problems.

- Pediatric Specialty Services
- Child Counseling
- Attention Deficit Disorders (ADHD)
- Adolescence Counseling
- Parenting Training
- Internal Family Systems
- Learning/Motivation

Hypnosis & Stress Management

Utilization of Hypnotic and Relaxation Methods for many conditions. Stress management in learning, and developing techniques to reduce overall tension and stress at work, school, home and away. Assertiveness training to meet your needs and reduce shyness.

Psychological Assessment

Licensed Psychologists in the community are utilized and consulted to provide assessment services for children, adolescents, adults and elders for psychological, vocational, learning disabilities, and memory testing for essential information needed for counseling treatment..

Specialty Services

- Internal Family Systems Therapy
- EMDR (Eye Movement Desensitization Rep)
- Desensitization Therapy
- Brain Wave Biofeedback
- Leadership Planning/Business Consulting



Telephone: (702) 294-0433

Fax: (702) 446-8363

Learn More at Our Website at:

<http://oasiscounselingtoday.com>

Exhibit “8”

Shute

male



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's DR. Appointment

2 messages

Wesley Lewis <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 1:12 PM

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Maria if you could please give proper notice for me to attend Isabella's doctors appointments I rescheduled my schedule to attend her appointment on the fourth you did not inform me that the DR. canceled the 4th and rescheduled it for the fifth at 2:30 which gave me exactly around what 16 hours notice after I did send you text messages and I did try to call Isabella's phone. You sent me a email at 7:38 PM after I send you text messages at 6:00 PM to wonder where this doctors office was you respond in ways that are not helpful to coparenting please all I'm asking is consideration for others

Sent from Wesley Lewis

Maria Daniela Perdomo <perdomomda@gmail.com>
To: juanfuentec@gmail.com

Sat, Oct 5, 2013 at 2:42 PM

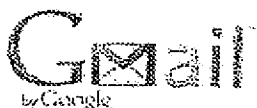
Sent from my iPhone

Begin forwarded message:

From: Wesley Lewis <info4WLewis@yahoo.com>
Date: October 5, 2013, 1:12:13 PM PDT
To: "perdomomda@gmail.com" <perdomomda@gmail.com>
Subject: Isabella's DR. Appointment

Maria if you could please give proper notice for me to attend Isabella's doctors appointments I rescheduled my schedule to attend her appointment on the fourth you did not inform me that the DR. canceled the 4th and rescheduled it for the fifth at 2:30 which gave me exactly around what 16 hours notice after I did send you text messages and I did try to call Isabella's phone. You sent me a email at 7:38 PM after I send you text messages at 6:00 PM to wonder where this doctors office was you respond in ways that are not helpful to coparenting please all I'm asking is consideration for others

Sent from Wesley Lewis



Maria Daniela Perdomo <perdomomda@gmail.com>

Respectful parenting and proper advance notice of appointment changes
2 messages

Wesley Lewis <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 2:27 PM

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Maria I called the doctors office Dr. Wheatley's office and they're not open on the weekends so if I'm not able to even get in contact with the doctor on my own account to understand how this appointment was rescheduled after being canceled due to the doctors personal reasons I feel it's in best interest if it would be rescheduled at a different time where everybody could attend and I can contact the doctor on the day of their operational hours I don't know how this doctor is at his office when the office is closed it makes it rather frustrating on my side due to the short notice and due to lack of communication thanks again

Regards

Wesley Lewis

Sent from Wesley Lewis

Maria Daniela Perdomo <perdomomda@gmail.com>
To: juanfuentec@gmail.com

Sat, Oct 5, 2013 at 2:41 PM

Sent from my iPhone

Begin forwarded message:

From: Wesley Lewis <info4WLewis@yahoo.com>

Date: October 5, 2013, 2:27:12 PM PDT

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Subject: Respectful parenting and proper advance notice of appointment changes

[Quoted text hidden]



Maria Daniela Perdomo <perdomomda@gmail.com>

Confirmation for Isabella's appointment

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 11:41 AM

Correction, Isabella's appointment is at 3:00 pm today not at 2:30. We hope to see you there. Please confirm if you can attend.

Sincerely,
Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>

Date: October 4, 2013, 7:36:57 PM PDT

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Subject: Isabella's Psychologist Appointment has changed

Wesley,

Please be aware that Warren Wheatley canceled this afternoon's appointment on the last minute, due to personal reasons. He reschedule for tomorrow after 2:30 pm.

I have not receive any confirmation of your assistance, please let me know if you will be able to attend tomorrow. If you cannot, Warren will contact you directly to schedule a meeting.

Sorry for any inconveniences this may cause.

Sincerely,

Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>

Date: September 29, 2013, 7:18:45 PM PDT

To: Wesley Allen Lewis <info4WLewis@yahoo.com>

Subject: Fwd: Isabella's Psychologist Appointment

Wesley,

I am writing to you to inform you that the psychologist evaluated Isabella and determined that she is having a depression, so she is going to start seeing Dr. Warren Wheatley once per week. The next appointment will be Friday, October 4th @ 6:00 pm at Oasis Counseling.

I am letting you know in advance so you can plan your schedule and be able to attend.

Sincerely,

Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: September 25, 2013, 8:59:12 PM PDT
To: Wesley Lewis <info4wiewis@yahoo.com>
Subject: Re: Isabella's Psychologist Appointment

Wesley,

I am sorry but the appointment cannot be rescheduled. Hope you can clear your agenda and make it on Saturday Sept 28th, if you cannot then I will inform you the outcome.

Sincerely,

Maria Perdomo

Sent from my iPhone

On Sep 25, 2013, at 3:47 PM, Wesley Lewis <info4wiewis@yahoo.com> wrote:

Maria

I'm quite sure that had a typo when informing of the date of Isabella's appointment ... "this" followed by "next" Sat. the 28th doesn't make sense ..and isn't adequate time for me to make arrangements to attend..please reschedule the appointment due to the sensitive nature of the appointment. thanks again, as for her phone its on and you talked with her by calling the land line tues afternoon.. so let me know the date of the rescheduled appointment so I can attend thanks maria..
Wesley Lewis

From: Maria Daniela Perdomo <perdomomda@gmail.com>

To: "info4WLewis@yahoo.com" <info4WLewis@yahoo.com>
Sent: Tuesday, September 24, 2013 7:12 PM
Subject: Isabella's Psychologist Appointment

Wesley,

I am writing to you regarding Isabella's appointment with the psychologist as suggested by Dr Heath Hodapp, on August 8th medical examination we both attend to at St. Rose Pediatrics.

I am letting you know that I have scheduled an appointment with Dr Warren Wheatley from Oasis Counseling LLC, this next Saturday September 28th at 10:00 am and your presence is required.

Directions:
2360 W. Horizon Ridge Parkway, Suite
120, Henderson, NV 89052
(702) 294 0433
<http://www.oasiscounselingtoday.com/>

Consultation price is 100.00 USD per hour.
Ps: could you please check that Isabella's phone is turn on as I have been trying to call her several times after school and I haven't able to talk to her.

Regards,

Maria Perdomo

Sent from my iPhone

Maria Daniela Perdomo <perdomomda@gmail.com>
To: juanfuentec@gmail.com

Sat, Oct 5, 2013 at 12:36 PM

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: October 5, 2013, 11:41:31 AM PDT
To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>
Subject: Confirmation for Isabella's appointment

<https://mail.google.com/mail/u/0/?ui=2&ik=b8d4715031&view=pt&search=sent&th=14189ecc2cb71c58>

[Quoted text hidden]



Exhibit “9”

Confidential Information

St. Ross Pediatrics, 2350 W. Horizon Ridge Parkway, Henderson, Nevada 89052

702-684-8658

Encounter Summary
ISABELLA LEWIS (Sex: F, DOB: 8/10/2006)
Date of Visit: 1/24/2014

Chief Complaint

SKIN RASH, dry skin and it itches a lot

Fever: None

ROS Findings

Respiratory: Denies daytime cough, nighttime cough disturbing sleep.
Gastrointestinal: Denies vomiting, diarrhea.

Patient History

Allergies, Past Medical History reviewed and *updated*, pertinent for:
Allergies/Reactions Reviewed by Michael Verona (350) 01/24/2014 14:35:30
No active medication allergies or reactions

Medication List Reviewed by Michael Verona (350) 01/24/2014 14:35:43

Problem List Reviewed by Dominic LaRocco (368) 01/24/2014 15:04:19

Vital Signs

Temp (TA): 98.7F / 37.1c @14:35
Weight: 46lb 8oz / 21.14kg (21 %ile)

Exam Findings

Constitutional: Normal general appearance: alert, pleasant, not ill appearing, no distress.

Eyes: Normal conjunctivae & lids: pink & moist.

Ears, Nose, Mouth, Throat: Normal canals & TMs: clear with normal landmarks & light reflex; nares: clear; oropharynx: moist mucous membranes, without pharyngeal erythema or intraoral lesions.

Neck: Normal neck: supple, trachea midline, no masses or significant adenopathy; without meningeal signs; thyroid: no enlargement or mass.

Respiratory: Normal respiratory effort: no retractions, no tachypnea; auscultation of lungs: clear & equal breath sounds without rales, rhonchi or wheeze.

Cardiovascular: Normal palpation of heart: PMI nondisplaced; auscultation of heart: regular rate & rhythm, no murmur.

Gastrointestinal: Normal abdomen: soft, nontender/nondistended, normal bowel sounds, no mass; liver & spleen: no hepatosplenomegaly.

Skin: ABNORMAL inspection: + generally dry skin with erythematous patches/scaling.

Assessment

Eczema...

DX 1: 691.8 ATOPIC DERMATITIS AND RELATED CONDITIONS OTHER

Plan

Discussed daily moisturizer, skin care

Avoid chemical irritants/use hypoallergenic detergents/soaps and no fabric softener/dryer sheets

For flares:

Call if no better 1-2 weeks, sooner for change/concerns.

Recheck in office prn

Patient Instructions

You were seen in our office today for eczema, also known as atopic dermatitis. It is important to realize that eczema cannot be "cured" but rather controlled through a variety of strategies. It is common for eczema to have periodic flare

Generated: 1/31/2014 4:11:46 PM

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v2012.4.12.1

Confidential Information

Page 1 of 2

Encounter Summary
ISABELLA LEWIS (Sex: F, DOB: 8/10/2006)

Date of Visit: 1/24/2014

ups which may require additional intervention. Treatment is focused on decreasing skin irritants and improving moisturization. When patients experience "flare ups" you will likely see rough, red, scaly patches at various locations. Flares may be triggered by change in weather, exposures to allergens or an illness. We will give you strategies including specific medications to use when your child has flares. Please follow the directions on your prescriptions closely. Contact our office if your child is not improving or you have additional questions or concerns. Additional information may be found at:
<http://www.healthychildren.org/English/health-issues/conditions/skin/Pages/Eczema.aspx>

Prescriptions

hydrocortisone ointment 2.5%

Dispense: 60 (sixty) gram

Apply topically twice a day

Start date: 01/24/2014

End date: 01/24/2014

Refills: 0

Substitutions Permitted

Procedures

99213 OFFICE/OUTPATIENT VISIT, EST

Patient accompanied by: Mother

Rendering Provider: Dominic LaRocco, PA (368)

Supervising Provider: Heath Hodapp, MD (317)

Assisted By: Michael Verona (350)

Finalized By: Dominic LaRocco, PA (368) 01/24/2014 03:13 PM

1/24/2014

Electronically Signed by: Dominic LaRocco, PA
License Number: 364

Date

Generated: 1/31/2014 4:11:46 PM

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v2012.4.12.1

Confidential Information

Page 2 of 2

YOUR PERSONAL PRESCRIPTION INFORMATION

Your Walgreens Pharmacy Location
601 S Green Valley Parkway
Henderson, NV 89052
(702)896-2956

IF YOU HAVE QUESTIONS ABOUT YOUR PRESCRIPTION, PLEASE CONTACT YOUR WALGREENS PHARMACIST OR CALL 1-800-WALGREENS.

PATIENT	ISABELLA LEWIS	DOCTOR	D. LAROCCO, PBR	DRUG DESCRIPTION
BIRTH DATE	08/10/06			
MEDICATION	HYDROCORTISONE 2.5% OINT 28.35GM			
QUANTITY	56.7	PATIENT	ALLERGIES	
DIRECTIONS	APPLY TOPICALLY TWICE DAILY			

INGREDIENT NAME: HYDROCORTISONE
(HYE-droe-KOR-ti-sona)

COMMON USES: This medicine is a corticosteroid used to reduce itching, redness, and swelling associated with many skin conditions. It may also be used to treat other conditions as determined by your doctor.

BEFORE USING THIS MEDICINE: INFORM YOUR DOCTOR OR PHARMACIST of all prescription and over-the-counter medicine that you are taking. ADDITIONAL MONITORING OF YOUR DOSE OR CONDITION may be needed if you are taking prednisone (or similar medicines). Inform your doctor of any other medical conditions, allergies, pregnancy, or breast-feeding.

HOW TO USE THIS MEDICINE: Follow the directions for using this medicine provided by your doctor. **TO USE THIS MEDICINE:** apply a small amount of medicine to the affected area. Gently rub the medicine in until it is evenly distributed. Wash your hands after applying this medicine, unless your hands are part of treated area. **DO NOT BANDAGE OR WRAP** the affected area unless directed otherwise by your doctor. **STORE THIS MEDICINE** at room temperature, away from heat and light. **KEEP THIS MEDICINE** out of the reach of children and away from pets. **IF YOU MISS A DOSE OF THIS MEDICINE,** apply it as soon as possible. If it is almost time for your next dose, skip the missed dose and go back to your regular dosing schedule.

CAUTIONS: **DO NOT TAKE THIS MEDICINE** if you have had an allergic reaction to it or are allergic to any ingredient in this product. **IF YOUR SYMPTOMS DO NOT IMPROVE WITHIN A FEW DAYS,** or if they become worse, check with your doctor. **DO NOT EXCEED THE RECOMMENDED DOSE** or use this medicine for longer than prescribed without checking with your doctor. **KEEP ALL DOCTOR AND LABORATORY APPOINTMENTS** while you are using this medicine. Do not use any other medicines or special cleansers on your skin unless your doctor instructs you otherwise. **AVOID GETTING THIS MEDICINE IN YOUR EYES** or on the inside of your nose or mouth. **CAUTION IS ADVISED WHEN USING THIS**

MEDICINE IN CHILDREN because they may be more sensitive to the effects of the medicine. **FOR WOMEN: IF YOU PLAN ON BECOMING PREGNANT,** discuss with your doctor the benefits and risks of using this medicine during pregnancy. **IT IS UNKNOWN IF THIS MEDICINE IS EXCRETED** in breast milk. **IF YOU ARE OR WILL BE BREAST-FEEDING** while you are using this medicine, check with your doctor or pharmacist to discuss the risks to your baby.

POSSIBLE SIDE EFFECTS: CHECK WITH YOUR DOCTOR AS SOON AS POSSIBLE if you experience skin thinning and discoloration, stinging, rash, dry skin, itching, burning, redness, or swelling not present before using this medicine. If you notice other effects not listed above, contact your doctor, nurse, or pharmacist. This is not a complete list of all side effects that may occur. If you have questions about side effects, contact your healthcare provider. Call your doctor for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088.

OVERDOSE: If overdose is suspected, contact your local poison control center or emergency room immediately. Symptoms may include muscle weakness; severe or persistent headache; symptoms of high blood sugar (eg, increased thirst, hunger, or urination; confusion; drowsiness; flushing; rapid breathing; fruit-like breath odor); unusual weight gain, especially in the face; or vision changes.

ADDITIONAL INFORMATION: **DO NOT SHARE THIS MEDICINE** with others for whom it was not prescribed. **DO NOT USE THIS MEDICINE** for other health conditions. **KEEP THIS MEDICINE** out of the reach of children. **IF USING THIS MEDICINE FOR AN EXTENDED PERIOD OF TIME,** obtain refills before your supply runs out.

KEEP OUT OF REACH OF CHILDREN: STORE IN SAFETY CONTAINER OR SECURE AREA.

Call your doctor for medical advice about side effects.
You may report side effects to FDA at 1-800-FDA-1

Do not flush unused medications or pour down a sink or drain.

WIC# 216362

your doctor. KEEP ALL DOCTOR AND LABORATORY APPOINTMENTS while you are using this medicine. Do not use any other medicines or special cleansers on your skin unless your doctor instructs you otherwise. AVOID GETTING THIS MEDICINE IN YOUR EYES or on the inside of your nose or mouth. CAUTION IS ADVISED WHEN USING THIS

KEEP OUT OF REACH OF CHILDREN: STORE IN SAFETY CONTAINER OR SECURE AREA.

ISABELLA LEWIS

8000 West Bauda #1013, Las Vegas, NV 89113
702/490-2082

RX # 0553063-066715

DATE: 01/24/14

HYDROCORTISONE 2.5% OINT 28.35GM

QTY: 56.7 NO REFILLS - DR. AUTH REQUIRED

New NDC: 00168-0146-30

Retail Price: \$27.99 Your Insurance Saved You: \$17.91

\$ 10.08

D. LAROCCO, PBR
MFG/FOUGERA
JCR/JCR/JCR/ JCR

PLAN: CTRX
GROUP# STNV
CLAIM REF# 140277505320007999

Walgreens

505 S GREEN VALLEY PARKWAY HENDERSON, NV 89052
PH: (702) 896-2956

Customer
Receipt

Pharmacy use only

ISABELLA LEWIS

8000 West Bauda #1013, Las Vegas, NV 89113
702/490-2082

RX # 0553063-066715

DATE: 01/24/14

HYDROCORTISONE 2.5% OINT 28.35GM

QTY: 56.7 NO REFILLS - DR. AUTH REQUIRED

New NDC: 00168-0146-30

Retail Price: \$27.99 Your Insurance Saved You: \$17.91

\$ 10.08

D. LAROCCO, PBR
MFG/FOUGERA
JCR/JCR/JCR/ JCR

PLAN: CTRX
GROUP# STNV
CLAIM REF# 140277505320007999

Walgreens

505 S GREEN VALLEY PARKWAY HENDERSON, NV 89052
PH: (702) 896-2956

Duplicate
Receipt

FRI 5:32PM
New

HYDROCORTISONE 2.5% OINT 28.35GM
00168-0146-30
ALPHA

QTY 56.7

JCR/JCR/JCR/ JCR

Learn more about ways to manage your health and your prescriptions at Walgreens.com/pharmacy.

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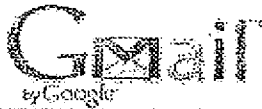
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8000 West Bauda #1013
Las Vegas, NV 89113
(702) 490-2082
*Your Insurance Saved You: \$17.91

FRI 5:32PM
\$10.08
Welcome
01/24/14
New
Need Allergy Info

Exhibit “10”



Maria Daniela Perdomo <perdomomda@gmail.com>

Indications for Isabella's skin condition

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Sun, Jan 26, 2014 at 9:08 PM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

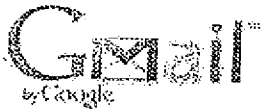
Wesley,

As I told you last Thursday, Isabella had a severe skin rash all over her body. Therefore I took her to the doctor immediately, and she was diagnosed with severe skin dryness as a result of being overexposed to hard water, meaning frequent long baths, that combined to the winter weather worsened her condition.

Finally, the doctor prohibited Isabella to take baths until summer. Therefore she should only take showers, for no longer than two minutes. Also, you should apply the ointment I put on her backpack twice a day preferably after showers even if the skin looks moisturized.

I will appreciate you follow these indications, as this condition is extremely unpleasant for Isabella to the point she can not focus in class.

Maria Daniela Perdomo



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's Skin Rash 01/23/14

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Maria Daniela Perdomo 7028862853 <perdomoMDA@gmail.com>

Mon, Feb 3, 2014 at 10:16 AM

Sent from my iPhone

Exhibit “11”

Encounter Summary

ISABELLA LEWIS (Sex: F, DOB: 08/10/2006)

Date of Visit: 01/31/2014

Chief Complaint

sore throat, cough, and red swollen eye today
decreased appetite, decreased activity

Fever: Low grade; Onset: 2 days ; Duration: Intermittent; Severity: Mild; Quality: Worsening
sore throat, low grade fever, swollen eye today
decreased appetite, restless sleep last night

ROS Findings

Constitutional: Reports fever/chills, body aches, headachy, loss of appetite, not sleeping well.

Eyes: Reports red eyes or eye drainage.

ENT: Reports runny nose and/or nasal congestion, sore throat, difficulty swallowing. Denies postnasal drip, ear pain, mouth ulcers.

Respiratory: Reports daytime cough, nighttime cough disturbing sleep. Denies wheezing or difficulty breathing.

Cardiovascular: Denies fainting during exercise.

Gastrointestinal: Reports decreased appetite. Denies nausea, vomiting, diarrhea.

Genitourinary (M/F): Reports good urine out put. Denies bloody, tea colored or dark urine.

Musculoskeletal: Reports normal activity when fever down.

Integumentary (Skin/Breast): Denies rashes or dry skin.

Patient History

Allergies, Past Medical History reviewed and updated, pertinent for:
Problem List Reviewed by Thalia Guerra (681) 01/31/2014 16:07:19

Allergies/Reactions Reviewed by Thalia Guerra (681) 01/31/2014 16:07:21
No active medication allergies or reactions

Medication List Reviewed by Thalia Guerra (681) 01/31/2014 16:07:23
OTC cough suppressant

Problem List Reviewed by Diane Goebel (440) 02/01/2014 23:14:08

Allergies/Reactions Reviewed by Diane Goebel (440) 02/01/2014 23:14:11
No active medication allergies or reactions

Medication List Reviewed by Diane Goebel (440) 02/01/2014 23:14:14

Vital Signs

Pulse Oximetry: 100 % @16:08
Pulse: 105 bpm
Temp (TA): 99.2F / 37.3c
Weight: 46lb / 20.91kg (18 %ile)

Exam Findings

Constitutional: Normal general appearance: alert, pleasant, not ill appearing, no distress.

Eyes: ABNORMAL conjunctivae & lids: no d/c no inflammation mild swelling left eye.

Ears, Nose, Mouth, Throat: ABNORMAL oropharynx: moist mucous membranes, with erythematous 3+ tonsils, exudate and palatal petechiae. Normal canals & TMs: clear with normal landmarks & light reflex; nares: clear.

Neck: ABNORMAL neck: supple, slightly increased anterior cervical adenopathy. Normal without meningeal signs.

Respiratory: Normal respiratory effort: no retractions, no tachypnea; auscultation of lungs: clear & equal breath

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sounds without rales, rhonchi or wheeze.

Cardiovascular: Normal palpation of heart; PMI nondisplaced; auscultation of heart: regular rate & rhythm, no murmur.

Skin: Normal inspection; no scarlatiniform rash.

Assessment

Group A strep pharyngitis

Group A strep pharyngitis

DX 1: 034.0 STREPTOCOCCAL SORE THROAT

DX 2: 780.60 FEVER, UNSPECIFIED

Plan

Rapid Strep: POSITIVE

Antibiotics as prescribed:

Treat symptoms with acetaminophen or ibuprofen as needed

Increase fluids

Discussed strep throat and expected course

Discussed contagious until on antibiotics for 24 hours

Follow up if not improved in 48-72 hrs or sooner if lethargy, irritability, poor feeding, persistent temperature, respiratory distress or poor urine output.

recheck prn

Rapid Strep: POSITIVE

Antibiotics as prescribed:

Treat symptoms with acetaminophen or ibuprofen as needed

Increase fluids

Discussed strep throat and expected course

Discussed contagious until on antibiotics for 24 hours

Follow up if not improved in 48-72 hrs or sooner if lethargy, irritability, poor feeding, persistent temperature, respiratory distress or poor urine output.

recheck prn

Patient Instructions

You were seen today for a strep throat, a bacterial infection of the throat caused by *Streptococcus pyogenes*. You have received a prescription for antibiotics, and it is important that you complete your medication according to the directions. Strep throat is not only treated to make the child feel better, but also to prevent potential complications of strep throat such as rheumatic fever. It is important that your child drink enough to stay well-hydrated. You may use acetaminophen or ibuprofen as needed for comfort. In addition, your child is contagious until on antibiotics for 24 hours and should not return to school/day care until fever-free x 24 hours and feeling improved. Call our office if your child is having difficulty swallowing, is not responding to medicine or you have other concerns. More information may be available at:
<http://www.healthychildren.org/English/health-issues/conditions/infections/Pages/Group-A-Streptococcal-Infections.aspx>

You were seen today for a strep throat, a bacterial infection of the throat caused by *Streptococcus pyogenes*. You have received a prescription for antibiotics, and it is important that you complete your medication according to the directions. Strep throat is not only treated to make the child feel better, but also to prevent potential complications of strep throat such as rheumatic fever. It is important that your child drink enough to stay well-hydrated. You may use acetaminophen or ibuprofen as needed for comfort. In addition, your child is contagious until on antibiotics for 24 hours and should not return to school/day care until fever-free x 24 hours and feeling improved. Call our office if your child is having difficulty swallowing, is not responding to medicine or you have other concerns. More information may be available at:
<http://www.healthychildren.org/English/health-issues/conditions/infections/Pages/Group-A-Streptococcal-Infections.aspx>

Prescriptions

Amoxicillin Suspension for Reconstitution 400 mg/5 mL

Dispense: 200 (two hundred) mL

Take 10 mL by mouth twice a day for 10 days
(10 mL = 800 mg) (5 mL = 1 tsp)

Encounter Summary
ISABELLA LEWIS (Sex: F, DOB: 08/10/2006)
Date of Visit: 01/31/2014

Start date: 01/31/2014
End date: 02/10/2014
Refills: 0
Substitutions Permitted

Orders
PULSE OX(IN HOUSE)
In House Diag Tests: STREP ASSAY

Diagnostic Tests
STREP ASSAY: POSITIVE Note: no culture sent to lab.mo

Procedures
99214 OFFICE/OUTPATIENT VISIT, EST

Patient accompanied by: Mother
Rendering Provider: Diane S. Goebel, MD (440)
Assisted By: (681)
Finalized By: Diane S. Goebel, MD (440) 02/01/2014 11:15 PM

Electronically Signed by: Diane S. Goebel, MD
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Heath Hodapp, M.D., F.A.A.P.
Michael Alazard, M.D., F.A.A.P.
S. Sangoeta Krishen, M.D., F.A.A.P.
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Dominic LaRocco, M.C.H.A., P.A.-C.

Phone: (702) 564-8556 Fax: (702) 564-4485

Date

1/31/14

Name Isabella Lewis

D.O.B. 02/10/06

Address 595 S. Green Valley Pkwy #923 Ph. (702) 885 2853

Rx Has sleep trouble
Needs to finish Amox
for ten day - if not
can get strep & rheumatic
fever & get heart disease
Weakish

☐ Label

Refill

times

DEA#

M.D.

Dispense only as written ☐

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Strep Throat (GAS) (cont.)



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[Take the Strep Throat Infection Quiz!](#)
[Infectious Mononucleosis Slideshow](#)

Medical Author: [John M. M. MD, FACP](#)
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What are the potential complications of strep throat?

The possible complications of strep throat include:

- Acute rheumatic fever (see below).
- Glomerulonephritis (see below).
- Otitis media (middle ear infection).
- Toxic shock syndrome (a rare but severe complication which may result in the failure of multiple organs and may thus be fatal).

▫ Peritonsillar abscess or retropharyngeal abscess (walled off infection containing GAS bacteria and pus which may encroach upon the structures in the back of the throat or invade and rupture into deeper structures which may ultimately be fatal), and PANDAS (Pediatric Autoimmune Neuropsychiatric Disorder Associated with Strep) - (see below).

Acute rheumatic fever (ARF): While rare, this complication of an untreated or inadequately treated strep infection can have devastating and lifelong consequences. It is believed that due to incomplete eradication of the strep bacteria,

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IN THIS ARTICLE

What is strep throat and what causes strep throat?

What are the signs and symptoms of strep throat?

Are the signs and symptoms of strep throat different in various age groups?

Is strep throat contagious?

How is the diagnosis of strep throat established?

What are home remedies, OTC, and medical treatments for strep throat?

What are the potential complications of strep throat?

How can I prevent contracting strep throat?

Strep throat facts

[Just a Sore Throat or Strep - Slideshow](#)

[Take the Strep Throat Infection Quiz!](#)

[Infectious Mononucleosis - Slideshow](#)

[Strep Throat \(Streptococcal\) Infection FAQs](#)

[Patient Comments: Strep Throat - Experience](#)

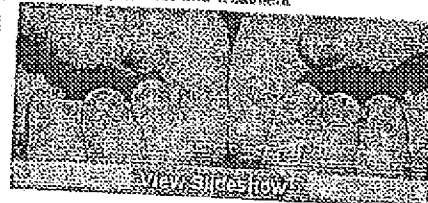
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Psoriasis

Symptoms, Causes and Treatment



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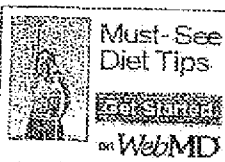
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Check Interactions

Strep Throat Symptoms, Causes, Treatment - What are the potential complications of strep throat? - MedicineNet

certain GAS develop an immune response which may attack the joints leading to permanent arthritis. More concerning is the autoimmune response to the heart valves which may damage them and may result in heart failure. Many studies have shown that effective and appropriate antibiotic therapy for strep throat vastly reduces the likelihood of developing ARF.

Throat - Treatments

Patient Comments: Strep Throat - Diagnosis

Strep Throat (GAS) Index

Glomerulonephritis: Similar to the aberration of the immune response seen with ARF, autoantibodies may develop to the microscopic filters (glomeruli) of the kidney. This complication more commonly affects children between 7 to 10 years of age. While more common than acute rheumatic fever, glomerulonephritis carries a less ominous prognosis. Helpful therapies exist and most children make a complete recovery and do not experience long-term kidney damage. Unlike ARF, the development of glomerulonephritis is not necessarily prevented by effective antibiotic treatment.

PANDAS (Pediatric Autoimmune Neuropsychiatric Disorder Associated with Strep): Specialists debate the proposed link of a GAS infection in children with the development and/or worsening of obsessive-compulsive behaviors or tic disorder (Tourette's syndrome in the extreme). One area being researched in this controversial condition is whether antibiotic therapy affects the development of or severity of the disorder.

Medically Reviewed by a Doctor on 10/4/2013

Next: How can I prevent contracting strep throat?

PREVIOUS

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Strep Throat (GAS) Index

Patient Comments

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Please describe your experience with strep throat.

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What home remedies soothed your strep throat symptoms and what antibiotics were prescribed for your case of strep throat?

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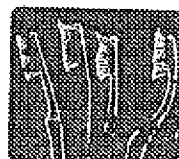
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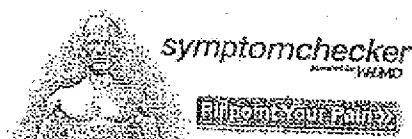
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How to Prevent Muscle Cramps



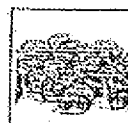
Sinus Problems? It Could Be a Sinus Infection

Strep Throat - Diagnosis

How was your case of strep throat diagnosed?

View 3 Comments

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Suggested Reading on Strep Throat by Our Doctors



Related Diseases & Conditions

15 articles

- Infectious Mononucleosis
 - Infectious mononucleosis is a virus infection in which there is an increase of white blood cells that are mononuclear (with a single nucleus) "Mono"
- Upper Respiratory Tract Infection
 - An upper respiratory infection is a contagious infection of the structures of the upper respiratory tract, which includes the sinuses, nasal passages,
- Group B Strep
 - Group B strep are bacteria called Streptococcus agalactiae that may sometimes cause infections both in a pregnant woman and her newborn. Symptoms include
- Sore Throat
 - Sore throats are normally described as pain or irritation in the throat area. A

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Persistent RA Symptoms?
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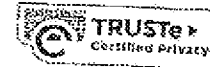
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Digestion
Health & Living
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Hearing & Ear
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Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's Skin Rash & Now She has Strep Throat!

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Maria Daniela Perdomo 7028852853 <perdomoMDA@gmail.com>, Wesley Allen Lewis 7023401221
<info4WLewis@yahoo.com> Sun, Feb 2, 2014 at 2:32 PM

Wesley,

Last Wednesday, January 29 Mrs Burgess contacted me to let me know that Isabella did not attend to school. I called Isabella on her cellphone but she did not answer, also called you with no luck either. Finally, I called your house and talked to your father about what happened to Isabella and why she was absence. He said it was nothing serious just sore throat, I advise him to tell you to take her to the doctor. This situation, Isabella's being absence from school and you not been able to communicate the reasons for it, have been happening over and over again in the past three weeks in January alone.

When I picked up Isabella from school last Thursday 30, she had flu symptoms, so I made an appointment for Friday 31 with Doctor Diane Gooble at Saint Rose Pediatrics. That Friday she had red skin around her eyes when I saw her after school, so I took her to the doctor as scheduled. After running some tests the diagnosis was strep throat which is a very serious and contagious infection. She was prescribed antibiotics, 10ml twice a day (morning and evening) for 10 days, I have already started the treatment and she is starting to feel a little better. As per the doctor directions, Isabella should rest and cannot be in contact with other kids for at least 48 hours after commencing the treatment. Therefore, she has been resting at home and she did not attend to her regular activities in my time.

I really do not like the way you are handling things in regard to Isabella's health during your days, I have been taking her to the doctor this past two weeks because she has been feeling sick during your days and you did nothing about it, not even take her to the doctor. Furthermore, last week when she was diagnose with severe skin rash by Doctor Dominic LaRocco at Saint Rose Pediatrics, you neglect to follow doctor's directions indicated on my email.

Finally, I am keeping her tonight, February 2, as I consider is the best way for me to follow the strep throat treatment thru at least the first two days which is vital for her recovery. Therefore, instead of coming for her tonight at 7:00pm do so tomorrow after school.

Best regards,

Maria Daniela Perdomo



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's red circles under her eyes. 1/31/14

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Maria Daniela Perdomo 7028852853 <perdomoMDA@gmail.com>

Mon, Feb 3, 2014 at 9:45 AM

▼

▼

▼

▼

▼

▼

▼

▼

▼ Sent from my iPhone

3 attachments



image.jpeg
103K



image.jpeg
115K



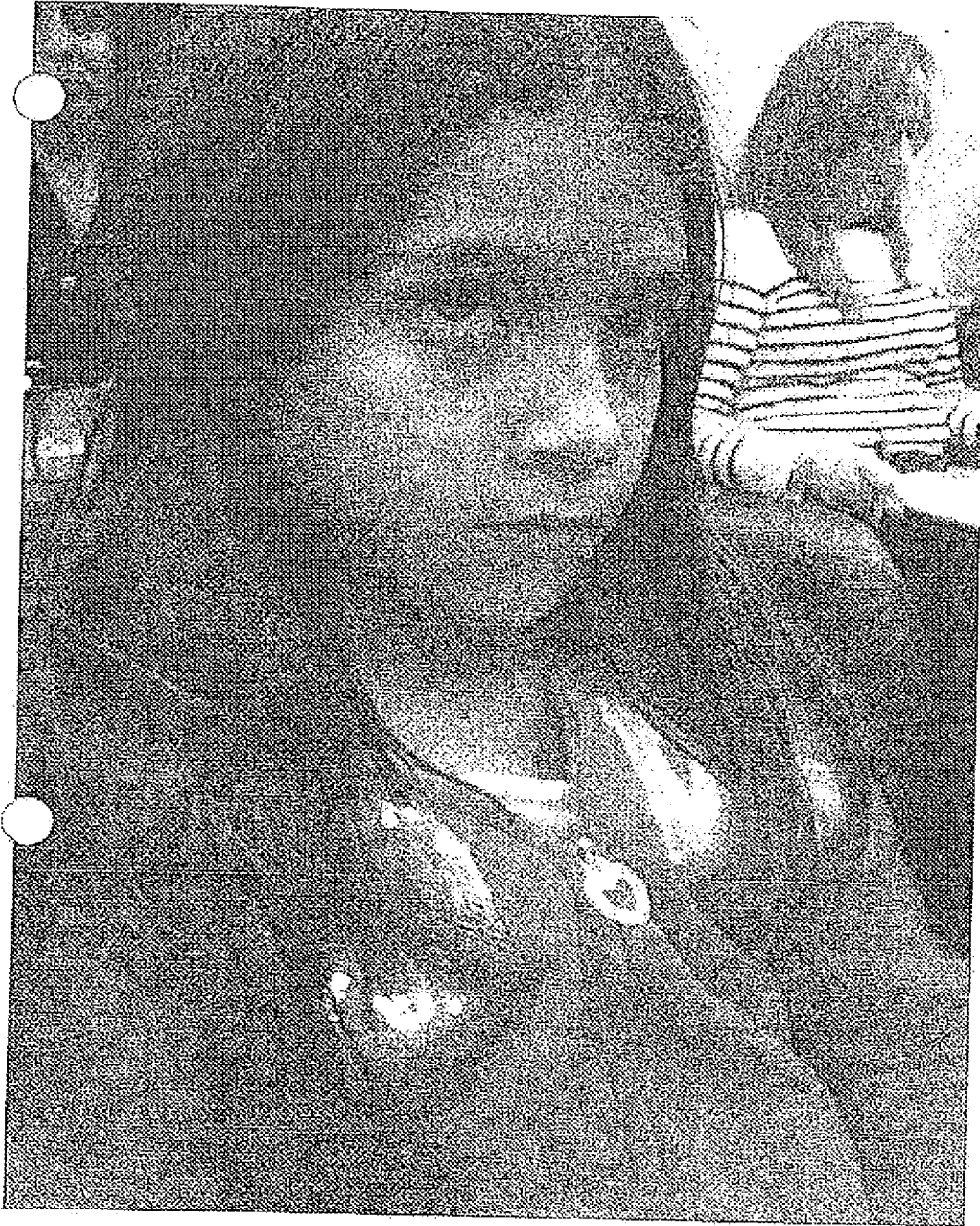
image.jpeg
91K

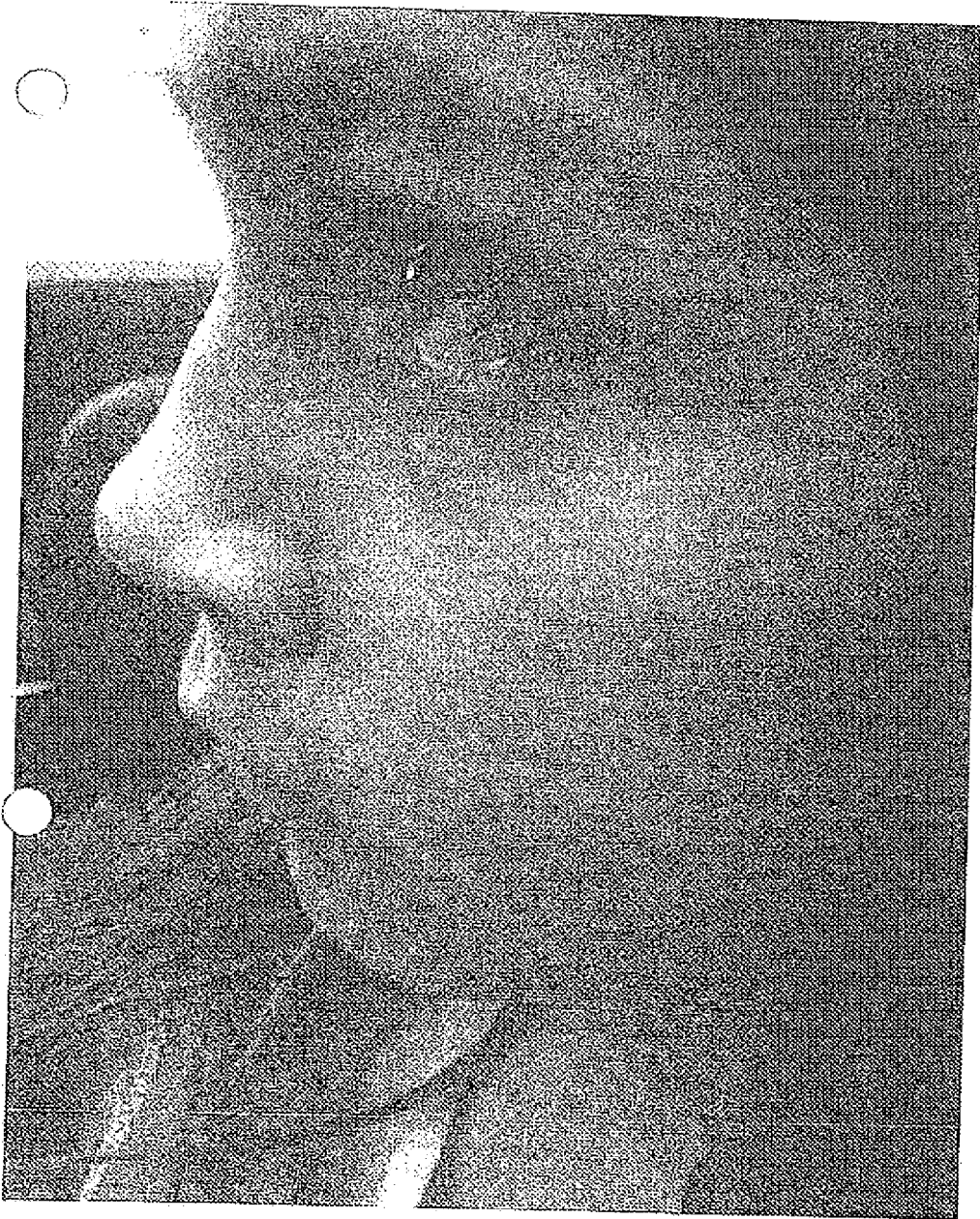
Maria Daniela Perdomo <perdomomda@gmail.com>

Mon, Feb 3, 2014 at 9:49 AM

<https://mail.google.com/mail/u/0/?ui=2&ik=b8d4715031&view=pt&search=inbox&th=143f...> 2/3/2014









Maria Daniela Perdomo <perdomomda@gmail.com>

Unable to reach Isabella

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

Thu, Feb 6, 2014 at 8:30 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Cc: Maria Daniela Perdomo 7028852853 <perdomoMDA@gmail.com>

Wesley,

I've been trying to reach Isabella on her cell phone for the last 3 days, including this morning before she went to school. Unfortunately, I cannot seem to be able speak to her to see how she's feeling in regards to her Strep throat. I've tried calling her during different times in the day or evening with no luck and it's really frustrating; this situation is becoming quite annoying.

When she is with you, I feel she's extremely distant and disconnected from me. In fact, on Monday before I left her at school she was extremely happy, sweet, caring, and responsive. However, when she's under your care I can't seem to communicate with her freely. Therefore, it is impossible for me to know how Isabella is doing during your days. She's so disconnected that the only way I can get any information about her wellbeing is by calling the school, emailing her teacher or by speaking to her counselor at Twitchell. It saddens me that you can be so careless to inform me about her health, school work or to even encourage her to take care of her phone.

Going back to her Strep throat condition, be sure to send back her antibiotics medication along with the ointment so I can continue with her treatment. Be aware that I will not be going to your place to pick up any medicine, Kumons, or Twitchell HW left behind as it happen last week.

Regards,

Maria Perdomo

Sent from my iPhone

Wesley Lewis <info4WLewis@yahoo.com>

Thu, Feb 6, 2014 at 2:02 PM

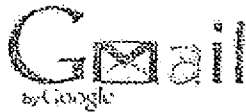
To: Maria Daniela Perdomo <perdomomda@gmail.com>

Maria her phone is always accessible ... In fact she was on it many times throughout the week, I made a effort to have it charged ... which might have back fired, after getting her medication and school work and lunch in her back pack water bottle and the apple she insisted on giving Ms. Burgess. Bella forgot her phone, I work from 5-11:30 I'll take her phone with me. You can just drive through valet and I can hand it to you, let me know

what you decide. Sorry about the inconvenience

Sent from Wesley Lewis
(Quoted text hidden)

Exhibit “12”



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's phone is off!! 9/24, 9/25

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>
To: Wesley Allen Lewis <info4WLewis@yahoo.com>

Wed, Sep 25, 2013 at 6:42 PM

Wesley,

I am trying to reach Isabella on her cellphone and it is off; as it was yesterday. I have informed you about this situation on our last email and yet the situation remains the same.

Could you please turn on the cell phone and make her call me. I would like to talk to her. Thank you

Sincerely,
Maria

Sent from my iPhone

Maria Daniela Perdomo <perdomomda@gmail.com>
To: juanfuentec@gmail.com

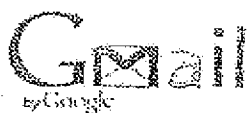
Wed, Sep 25, 2013 at 6:42 PM

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: September 25, 2013, 6:42:00 PM PDT
To: Wesley Allen Lewis <info4WLewis@yahoo.com>
Subject: Isabella's phone is off!! 9/24, 9/25

(Quoted text hidden)



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's Extracurricular Activities Time Schedule 2023-2014

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>
To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Mon, Sep 30, 2013 at 10:02 PM

Wesley,

I am writing to you in order to let you know Isabella's time schedule her Extracurricular Activities for the year 2013-2014.

All the information is shown on the pdf file attached



Please be aware that there are some extra costs for the uniforms, gear and accessories:

- All Star Competition & uniforms including shoes:
400.00 USD

- Warm up suit:
75.00 USD

- Bow and hair accessories:
20.00 USD

The following information is regarding Isabella's All Star Cheer Lakers Team, Out of State competition:

Jamz Youth Cheerleading
Competition
Date: Nov 3, 2013 | Sunday

Venue:
Six Flags Magic Mountain/Golden Bear Theatre
26101 Magic Mountain Parkway
Valencia, CA 91355

Details:
Jamz Youth Cheerleading
Group:
All Star Cheer Lakers Las Vegas

Six Flags and JAMZ invites All Star Lakers Cheer Youth, to compete at this year's Coaster Classic on Sunday, November 3, 2013. For more information and to get tickets, please contact (800) 920-4272 or log on to www.jamz.com.

If you want to attend to Isabella's outstate competition please contact Coach Delilah, from Larry Lakes Gymnastics, the contact information is shown on the chart.

Sincerely,

Maria

2 attachments

Activity	Days	Time	Location	Notes
Isabella's Time Schedule	Monday	4:00 - 5:00 PM	Isabella's Time Schedule	Isabella's Time Schedule
Isabella's Time Schedule	Tuesday	4:00 - 5:00 PM	Isabella's Time Schedule	Isabella's Time Schedule
Isabella's Time Schedule	Wednesday	4:00 - 5:00 PM	Isabella's Time Schedule	Isabella's Time Schedule
Isabella's Time Schedule	Thursday	4:00 - 5:00 PM	Isabella's Time Schedule	Isabella's Time Schedule
Isabella's Time Schedule	Friday	4:00 - 5:00 PM	Isabella's Time Schedule	Isabella's Time Schedule

Isabellas Time Schedule.jpg
73K

Isabella's Time Schedule.pdf
35K

Maria Daniela Perdomo <perdomomda@gmail.com>
To: Juan Fuente <juanfuentec@yahoo.com>

Tue, Oct 1, 2013 at 9:29 AM

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: September 30, 2013, 10:02:52 PM PDT
To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>
Subject: Isabella's Extracurricular Activities Time Schedule 2023-2014

[Quoted text hidden]

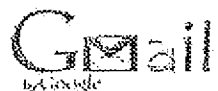
2 attachments

Activity	Days	Time	Location	Notes
Isabella's Time Schedule	Monday	4:00 - 5:00 PM	Isabella's Time Schedule	Isabella's Time Schedule
Isabella's Time Schedule	Tuesday	4:00 - 5:00 PM	Isabella's Time Schedule	Isabella's Time Schedule
Isabella's Time Schedule	Wednesday	4:00 - 5:00 PM	Isabella's Time Schedule	Isabella's Time Schedule
Isabella's Time Schedule	Thursday	4:00 - 5:00 PM	Isabella's Time Schedule	Isabella's Time Schedule
Isabella's Time Schedule	Friday	4:00 - 5:00 PM	Isabella's Time Schedule	Isabella's Time Schedule

Isabellas Time Schedule.jpg
73K

Isabella's Time Schedule.pdf
35K

ACTIVITY	INSTITUTION	LOCATION	THURSDAY	FRIDAY	SATURDAY	SUNDAY	MONTHLY COSTS
Gymnastics	Larry Lakes Gymnastics, LLC	1483 W Horizon Ridge Pkwy Henderson, NV 89012 +1 702-998-6397	6:00 - 7:00 PM	4:00 - 5:00 PM	-	-	200.00 \$
Mini Cheer			-	-	12:00 - 1:30 PM	-	
All Star Cheer			7:00 - 8:00 PM	-	10:00 - 11:00 AM	-	
Private Tutoring	Kumon Math and Reading Center of Henderson	10890 South Eastern Avenue, Suite #113, Henderson, NV 89012	2:30 - 3:30 PM	-	-	-	200.00 \$
TOTAL COSTS PER MONTH							400.00 \$



Maria Daniela Perdomo <perdomomda@gmail.com>

Library Courtesy Reminder

2 messages

do.not.reply@mypubliclibrary.com <do.not.reply@mypubliclibrary.com>

Tue, Oct 1, 2013 at 6:23 AM

Reply-To: do.not.reply@mypubliclibrary.com

To: perdomomda@gmail.com

From:

Paseo Verde Library
280 S Green Valley Parkway
Henderson, NV 89012
702-492-7252

To:

Isabella Lewis
585 Green Valley Parkway
HENDERSON, NV 89012

JUST A REMINDER. The following items are due back to the library soon. Please return to any Henderson Library, or renew the items by going to <http://www.mypubliclibrary.com>. Items may also be renewed by phone or in person. Our library locations and phone numbers can be accessed on our website at <http://www.mypubliclibrary.com/catalog/library/userdef/locations.aspx>.

Additional items from other libraries may also be due. Please check your account to verify the due dates on your outstanding items. Do not respond to this email, refer questions to reference@hdpl.org. Thanks for using Henderson Libraries.

Due Date	Title	Format	From	Renewals
10/5/2013	Oh say can you say?	Book	Paseo Verde Library	5

If you do not wish to receive this information via email, please contact the library at reference@hdpl.org.

Maria Daniela Perdomo <perdomomda@gmail.com>

Tue, Oct 1, 2013 at 9:29 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

Isabella left this book at your house. Ca you help her find it and bring it back to school on Thrusday

Sincerely,
Maria

Sent from my iPhone

Begin forwarded message:

From: <do.not.reply@mypubliclibrary.com>
Date: October 1, 2013, 6:23:03 AM PDT
To: <perdomomda@gmail.com>
Subject: Library Courtesy Reminder
Reply-To: <do.not.reply@mypubliclibrary.com>

[Quoted text hidden]



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's has Stomach flu symptoms

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Sat, Oct 12, 2013 at 8:58 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

I'm writing you to inform you that Isabella has been ill since yesterday and has stomach flu like symptoms such as vomiting, muscle pains, low grade fever, and her appetite has decreased significantly. She's been resting and drinking plenty of fluids to prevent dehydration.

Due to her condition, I'm canceling her appointment with Dr. Warren, along with her gymnastics and AllStar Cheer practices.

If she doesn't feel better by Monday then I will make an appointment with her pediatrician, Dr. Heath Hodapp @ St. Rose Pediatrics.

Sincerely,
Maria

Sent from my iPhone



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's activities for next week

3 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

Sun, Oct 27, 2013 at 5:34 PM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

I am writing to you to remind you, as we had agreed via text message, that Isabella has a mandatory cheerleading practice tomorrow from 7:00 to 8:00 pm at Larry Lakes. She has the uniform and shoes in her bag (backpack).

Also, Isabella has a book report to turn in tomorrow. We have already done it and it includes a painting/ on a canvas, so please be sure she gets it to school.

Next thursday, she must wear a custom for school's Halloween celebration. So I am sending her Rapunzel dress and shoes for that purpose.

Finally, please do not forget about kumons on Tuesday from 3:00-4:00 pm. The blue package is in her bag.

Regards,

Maria

Sent from my iPhone

Wesley Lewis <info4WLewis@yahoo.com>

Sun, Oct 27, 2013 at 5:54 PM

To: Maria Daniela Perdomo <perdomomda@gmail.com>

I was asked by you to take Bella to Kumons on Monday's any schedule changes would be appreciated if I was asked if the day changes will be ok .. And larrys lakes location would be appreciated if given .. Also if possible Bellas Dr appointments on sat .. If that could alternate to one of the days she's with me would make it possible for us both to be involved thanks Maria see you at the pumpkin patch @7:30

Sent from Wesley Lewis

[Quoted text hidden]

Maria Daniela Perdomo <perdomomda@gmail.com>

Mon, Oct 28, 2013 at 8:38 AM

To: Wesley Lewis <info4WLewis@yahoo.com>

Nothing has changed with Kumons. You can take her as early as 2:30pm on Mondays. The tutoring session should not take last more than 1 hour and half.

Larry Lakers is located on 215 and Stephanie. Cross streets are Horizon Ridge and Arroyo right behind the albertson shopping center. Take the 215, exit Stephanie, turn right on Horizon, make a U turn on Arroyo. Practice At 7:00pm, please arrive 10 minutes early if you can.

The Address is:

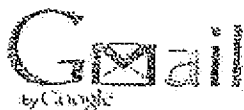
1483 W Horizon Ridge Pkwy, Henderson, NV

In regards to Warren, Isabella's Psychologist, Warren said that you never called him to schedule an appointment.

Based on availability, I will let you know if he can see her during the week between Monday - Wednesday.

Sincerely,
Maria

[Quoted text hidden]



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella was absent from school

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Fri, Nov 1, 2013 at 11:47 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

I'm writing to inform you that Isabella was absent from school today, on November 1, 2013, due to lower back pain. This morning I took her to get checked out at St. Rose Pediatrics, located at 2350 W. Horizon Ridge, Henderson NV 89052. She was seen by Dr. Diane Goebel because Dr. Heath Hodapp was not available.

Dr. Goebel said that Isabella has a small muscle spasm on her lower back from playing on the monkey bars. The Dr. Suggested for her to relax for today; to apply heat on her back and to massage the area with ice hot; In which I've already done. She also suggested for Isabella to go in a swirled pool or jacuzzi to help relax the back.

If you have any question or concerns, please feel free to contact Dr. Goebel at her office (702) 564-8556.

Best Regards,
Maria

Sent from my iPhone



Maria Daniela Perdomo <perdomomda@gmail.com>

New Address from St. Pediatrics

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

Fri, Nov 1, 2013 at 8:38 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

Im writing to inform you that that Isabella's Pediatrician, Dr. Heath Hodapp, has moved to a new location.

The new address is:

St. Rose Pediatrics
2350 W. Horizon Ridge Parkway
Henderson, NV 89052

P: (702) 564- 8556

Cross streets are: Green Valley Pkwy & Horizon Ridge

Website: [www. StRosePeds.com](http://www.StRosePeds.com)

Sincerely,
Maria

Sent from my iPhone

Maria Daniela Perdomo <perdomomda@gmail.com>

Fri, Nov 1, 2013 at 12:15 PM

To: Maria Daniela Perdomo 7028852853 <perdomoMDA@gmail.com>

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>
Date: November 1, 2013, 8:38:50 AM PDT
To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>
Subject: New Address from St. Pediatrics

[Quoted text hidden]



Maria Daniela Perdomo <perdomomda@gmail.com>

We are moving!!

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Mon, Nov 11, 2013 at 9:36 PM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Wesley,

Please be informed that my address will change effective on December 1, 2013, to the following address:

595 S. Green Valley Parkway

APT #923

Henderson, NV 89012

My telephone number remains the same: (702) 885-2853

Please update your records accordingly. Feel free to contact me for additional information. Btw, I'm happy to announce that Isabella will have her own private bedroom and bath.

Sincerely,

Maria Perdomo



Maria Daniela Perdomo <perdomomda@gmail.com>

Winter break 2013- 2014

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Fri, Dec 13, 2013 at 11:07 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

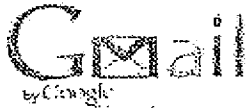
Wesley,

I am writing to you regarding the winter holidays. As I told you via SMS, I will be taking Isabella to California for Christmas.

The school vacation time starts on December 20th until January 6th, so I will have her from Dec 20th till 29th. You can pick her up that Sunday at my house around 7:30 pm.

Best regards,

Maria



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella whereabouts for this weekend?

1 message

Maria Daniela Perdomo <perdomomda@gmail.com>

Sat, Jan 4, 2014 at 10:32 AM

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Cc: Maria Daniela Perdomo 7028852853 <perdomoMDA@gmail.com>

Wesley,

I am writing to you because Isabella mention over the phone that there was a possibility of she going out of town with her grandmother this weekend. As you know we are obligated by law to inform each other when Isabella is going out of town with the other parent. I have yet now received any email from you notifying me about this trip with her grandmother, I have no address, no telephone number or any information in regards to whereabouts.

I have been trying to call her and her cellphone is off (for several days now), please provide me with the information ASAP, land line number, location, who is she staying with?

Sincerely,

Maria

Sent from my iPhone

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Maria Perdomo
Plaintiff/Petitioner

-VS-

Nestor Lewis
Defendant/Respondent

CASE NO. D-10-427054-13

DEPT. I

**FAMILY COURT MOTION/OPPOSITION
FEE INFORMATION SHEET (NRS 19.0312)**

Party Filing Motion/Opposition: ☒ Plaintiff/Petitioner ☐ Defendant/Respondent

MOTION FOR/OPPOSITION TO Modify Custody

Notice

**Motions and Oppositions to
Motions filed after entry of
final Decree or Judgment
(pursuant to NRS 125,
125B & 125C)
are subject to the Re-open
Filing Fee of \$25.00, unless
specifically excluded.
(See NRS 19.0312)**

Excluded Motions/Oppositions

- ☐ Motions filed before final Divorce/Custody Decree entered
(Divorce/Custody Decree NOT final)
- ☐ Child Support Modification ONLY
- ☐ Motion/Opposition For Reconsideration (Within 10 days of Decree)
Date of Last Order _____
- ☐ Request for New Trial (Within 10 days of Decree)
Date of Last Order _____
- ☒ Other Excluded Motion _____
(Must be prepared to defend exclusion to Judge)

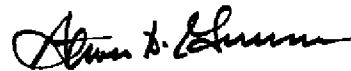
NOTE: If no boxes are checked, filing fee **MUST** be paid.

☐ Motion/Opp IS subject to \$25.00 filing fee ☒ Motion/Opp IS NOT subject to filing fee

Date: March 19, 2014

Tamara Gaffard
Printed Name of Preparer

[Signature]
Signature of Preparer



CLERK OF THE COURT

COM
THE FINE & PRICE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT


CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10-427054-D
Plaintiff,)	DEPT. NO. T
)	
vs.)	DATE OF HEARING: 5.1.14
)	TIME OF HEARING: 9:30 a.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

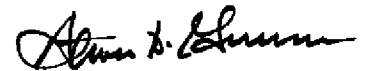
CERTIFICATE OF MAILING

I hereby certify that on 25th day of March, 2014,
service of the MOTION TO MODIFY CUSTODY; TO ENFORCE ORDER OF
DECEMBER 27TH, 2013 AND AN AWARD OF ATTORNEY'S FEES filed on March
19th, 2014 was made by placing a copy of same into the United States
Mail, first class postage prepaid, at Las Vegas, Nevada, addressed
to:

Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103



An Employee of The Fine & Price Law Group



CLERK OF THE COURT

1 ORD
2 The Fine Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 Suite 5
6 8975 South Pecos Road
7 Henderson, Nevada 89074
8 Telephone: 702/384-8900
9 Facsimile: 702/384-6900
10 corinne@thefinelawgroup.com
11 Attorney for Plaintiff
12 MARIA DANIELA LEWIS nka
13 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS nka)	
11 MARIA DANIELA PERDOMO)	
)	
12 Plaintiff,)	CASE NO: D-10-427054-D
)	DEPT NO: T
13 vs.)	
)	DATE OF HEARING:
14 WESLEY ALLEN LEWIS,)	TIME OF HEARING:
)	
15 Defendant.)	

16 ORDER TO SHOW CAUSE

17 This matter having come before the Court on Plaintiff's
18 Motion To Modify Custody and to Enforce Order of December 27, 2013
19 and an Award of Attorney's Fees; that the Order from the Hearing o
20 October 8, 2013 and filed on December 27, 2013 states on page 10,
21 lines 7 through 15 as follows:

22 "IT IS FURTHER ORDERED that Defendant shall pay
23 Plaintiff the full \$241.00 in October by October 31,
24 2013. Commencing November 2013 and continuing until
25 there is a wage assignment in place, Defendant may pay to
26 Plaintiff \$120.50 on the 5th day of the month and \$120.50
27 on the 20th day of the month. A failure by Defendant to
28 make any one payment is a contempt of court, and
Plaintiff may submit an Order To Show Cause with a
Support Affidavit/Declaration detailing the missed
payment(s) to obtain an evidentiary hearing regarding
contempt."

RECEIVED

MAR 21 2014

1 Attached as Exhibit "1" is the Plaintiff's Motion to
2 Modify Custody and to Enforce [this Court's] Order of December 27,
3 2013 as and for the Affidavit to support this Order to Show Cause.

4 Therefore, the Court having reviewed said motion and
5 having considered the arguments of counsel, and good cause
6 appearing,

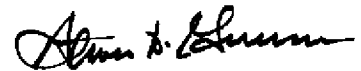
7 IT IS HEREBY ORDERED that Defendant come before the Court
8 on the 21st day of May, 2014 at 2:00 p.m. of said day
9 to show cause, if any he has, why he should not be held in contempt
10 of Court and punished accordingly for his failure to comply with
11 this Court's Order from the evidentiary hearing held on October 8,
12 2014 and reduced to a written Judgment and filed with this Court on
13 the 27th day of December, 2013.

14 DATED this 24th day of March, 2014 2014

15
16
17 DISTRICT COURT JUDGE
GAYLE NATHAN

18 Submitted by:

19 Frances-Ann Fine
20 The Fine Law Group
21 FRANCES-ANN FINE, ESQ.
22 Nevada Bar No. 0025
23 8975 S Pecos Road, Suite 5
24 Henderson, Nevada 89074
25 Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO



CLERK OF THE COURT

NEOJ
THE FINE & PRICE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

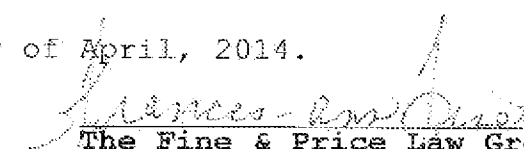
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT. NO. T
vs.)	
)	
WESLEY ALLEN LEWIS,)	
Defendant.)	

NOTICE OF ENTRY OF ORDER TO SHOW CAUSE

TO: WESLEY ALLEN LEWIS, Defendant; and
TO: PATRICIA A. MARR, ESQUIRE, Attorney for Defendant;
YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an
ORDER TO SHOW CAUSE, a copy of which is attached hereto, was
entered and filed in the above-entitled matter on the 27th day of
March, 2014.

DATED the 1st day of April, 2014.



The Fine & Price Law Group
FRANCES-ANN FINE, ESQUIRE
8975 S. Pecos Road, Ste. 5
Henderson, Nevada 89074
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

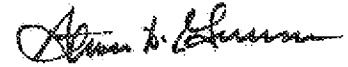
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CERTIFICATE OF MAILING

I hereby certify that on this 1st day of April, 2014, a copy of the foregoing NOTICE OF ENTRY OF ORDER TO SHOW CAUSE was placed into the United States Mail, first class postage prepaid at Henderson, Nevada, addressed to:

Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Dr., Ste. #185
Las Vegas, Nevada 89103


An Employee of The Fine & Price Law Group


CLERK OF THE COURT

ORD
The Fine Law Group
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
Suite 5
8975 South Pecos Road
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
corinne@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO)	
)	
Plaintiff,)	CASE NO: D-10-427054-D
)	DEPT NO: T
vs.)	
)	DATE OF HEARING:
WESLEY ALLEN LEWIS,)	TIME OF HEARING:
)	
Defendant.)	

ORDER TO SHOW CAUSE

This matter having come before the Court on Plaintiff's Motion To Modify Custody and to Enforce Order of December 27, 2013 and an Award of Attorney's Fees; that the Order from the Hearing on October 8, 2013 and filed on December 27, 2013 states on page 10, lines 7 through 15 as follows:

"IT IS FURTHER ORDERED that Defendant shall pay Plaintiff the full \$241.00 in October by October 31, 2013. Commencing November 2013 and continuing until there is a wage assignment in place, Defendant may pay to Plaintiff \$120.50 on the 5th day of the month and \$120.50 on the 20th day of the month. A failure by Defendant to make any one payment is a contempt of court, and Plaintiff may submit an Order To Show Cause with a Support Affidavit/Declaration detailing the missed payment(s) to obtain an evidentiary hearing regarding contempt."

RECEIVED

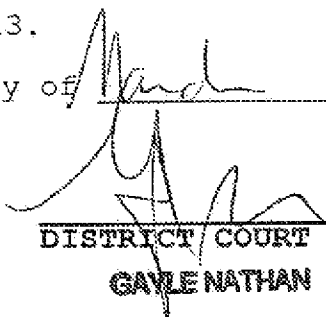
MAR 21 2014

1 Attached as Exhibit "1" is the Plaintiff's Motion to
2 Modify Custody and to Enforce [this Court's] Order of December 27,
3 2013 as and for the Affidavit to support this Order to Show Cause.

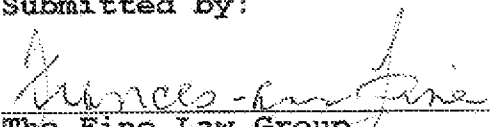
4 Therefore, the Court having reviewed said motion and
5 having considered the arguments of counsel, and good cause
6 appearing,

7 IT IS HEREBY ORDERED that Defendant come before the Court
8 on the 21st day of May, 2014 at 2:00 p.m. of said day
9 to show cause, if any he has, why he should not be held in contempt
10 of Court and punished accordingly for his failure to comply with
11 this Court's Order from the evidentiary hearing held on October 8,
12 2014 and reduced to a written Judgment and filed with this Court on
13 the 27th day of December, 2013.

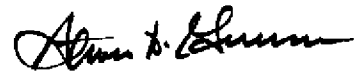
14 DATED this 24th day of March, 2014.

15
16 
17 DISTRICT COURT JUDGE
18 GAYLE NATHAN

19 Submitted by:

20 
21 The Fine Law Group
22 FRANCES-ANN FINE, ESQ.
23 Nevada Bar No. 0025
24 8975 S Pecos Road, Suite 5
25 Henderson, Nevada 89074
26 Telephone: 702/384-8900
27 Facsimile: 702/384-6900
28 Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

1 PSER
The Fine Law Group
2 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
3 8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
4 Telephone: 702/384-8900
Facsimile: 702/384-6900
5 fran@thefinelawgroup.com
Attorney for Plaintiff
6 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO



CLERK OF THE COURT

7 DISTRICT COURT

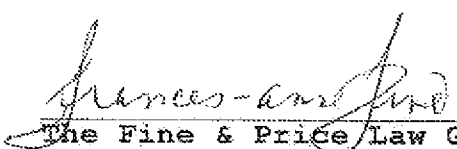
8 CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka)
MARIA DANIELA PERDOMO,)
10 Plaintiff,) CASE NO. D-10-4270A-D
11 vs.) DEPT. NO. T
12 WESLEY ALLEN LEWIS,)
13 Defendant.)
14)

15 PROOF OF SERVICE

16 COMES NOW Plaintiff, MARIA PERDOMO, by and through her
17 attorney, FRANCES-ANN FINE, ESQUIRE of The Fine & Price Law Group,
18 and submits to the Court the attached Affidavit Of Service
19 evidencing personal service of the Order to Show Cause and Motion
20 to Modify Custody et. al., upon Defendant, WESLEY ALLEN PERDOMO, on
21 March 27, 2014.

22 DATED this 2nd day of April, 2014.

23
24 
25 The Fine & Price Law Group
FRANCES-ANN FINE, ESQUIRE
26 Nevada Bar No. 0025
Suite 5
27 8975 South Pecos Road
Henderson, Nevada 89074
28 Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA PERDOMO

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Patricia Marr, Esquire
4305 Dean Martin Drive
Suite 185
Las Vegas, Nevada 89103

Page 2 of 2

1 STATE OF NEVADA)

2)ss
3 COUNTY OF CLARK)

AFFIDAVIT OF SERVICE

4 Gerald R Fitzsimmons (#738364), being duly sworn, says: That all time herein affiant is a
5 citizen of the United States, was and is over 18 years of age, not a party to nor interested in the
6 proceeding in which this affidavit is made. That affiant received a copy of the Order to Show Cause
7 Motion to Modify Custody, to Enforce Order of December 27, 2013 and an Award of Attorney's Fees
8 on the 26th day of March, 2014, and served the same on the 27th day of March, 2014 at 2:40pm by:

(Affiant must complete the appropriate paragraph)

9 1. Delivering and leaving a copy with the Defendant Wesley Allen Lewis at (state address):
10 4650 Idaho Ave. Las Vegas, Nevada.

11 2. Serving the Defendant _____ by personally delivering and
12 leaving a copy with _____, a person of suitable age and
13 discretion residing at the Defendant's usual place of abode located at (state address): _____

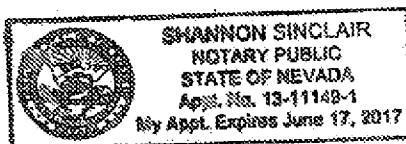
14 I declare under penalty of perjury under the law of the State of Nevada that the foregoing is
15 true and correct.

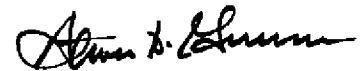
Dated this 28th day of March, 2014

16
17 Gerald R. Fitzsimmons
18 Affiant
19 Corporate Intelligence Int'l
20 720 E Charleston Blvd Suite 135
21 Las Vegas, Nevada 89104
22 State License #595-595A

23 **SUBSCRIBED AND SWORN** to before me this
24 28th day of March, 2014

25 Shannon Sinclair
26 NOTARY PUBLIC in and for said County and State
27 My Commission expires: _____
28 (SEAL)





CLERK OF THE COURT

MOT
PATRICIA A. MARR, LTD.
PATRICIA A. MARR, ESQ.
Nevada Bar No. 8846
2470 St. Rose Parkway, Ste. 106H
Henderson, Nevada 89074
(702) 353-4225 (phone)
(702) 912-0088 (fax)
Lvlaw03@yahoo.com

Mailing Address:
9484 South Eastern Ave., #399
Las Vegas, Nevada 89123
Attorney for Defendant
WESLEY ALLEN LEWIS

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS aka)	
MARIA DANIELA PERDOMO,)	Case No. D-10-427054
)	Dept No. 1
Plaintiff,)	
)	
v.)	
)	
WESLEY ALLEN LEWIS,)	
)	
Defendant,)	
)	

MOTION TO WITHDRAW AS ATTORNEY FOR DEFENDANT ON ORDER

SHORTENING TIME

Date of Hearing: 5 / 22 / 2014

Time of Hearing: 9 : 00 AM

COMES NOW, PATRICIA A. MARR, ESQUIRE of the law firm of PATRICIA A.
MARR, LTD., and respectfully requests this Honorable Court for leave to withdraw as counsel of

1 record for Defendant, WESLEY LEWIS, based upon Defendant's inability to abide by his financial
2 agreement and non-communication with client.

3 This Motion is made and based upon the attached Declaration of PATRICIA A. MARR,
4 ESQUIRE of the law firm of PATRICIA A. MARR, LTD., the Memorandum of Points and
5 Authorities attached hereto, the pleadings and papers on file herein, and upon the arguments of
6 counsel, should the Court wish to hear the same.
7

8 DATED this 9th day of April, 2014.
9

10 PATRICIA A. MARR, LTD.

11 /s/Patricia A. Marr, Esq.

12
13 PATRICIA A. MARR, ESQ.
14 Nevada Bar No. 8846
15 2470 St. Rose Parkway, Ste. 106H
16 Henderson, Nevada 89074
17 (702) 353-4225 (phone)
(702) 912-0088 (fax)
Lvlaw03@yahoo.com

18 Mailing Address:
19 9484 South Eastern Ave., #399
20 Las Vegas, Nevada 89123
21 *Attorney for Defendant*
22 *WESLEY ALLEN LEWIS*
23
24
25
26
27
28

1 NOTICE OF MOTION

2
3 TO: FRANKLINE, ESQUIRE, Attorney for the Plaintiff.

4 TO: WESLEY LEWIS, the above-named Defendant.

5
6 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned
7 attorney will bring the foregoing **MOTION TO WITHDRAW AS COUNSEL AS FOR**
8 **DEFENDANT ON ORDER SHORTENING TIME**, on for hearing before the above-entitled
9 5 / 2 2 / 2 0 1 4 9 : 0 0 AM
10 Court on the ____ day of _____, 2014, at the hour of _____ o'clock ____m., before the Family Court
11 Judge in Department No. "T", or as soon thereafter as counsel may be heard. You are required to
12 attend if you wish to oppose said Motion. In the event you do not respond to said Motion within
13 ten (10) days upon your receipt of same, an Order may be entered for the relief requested without a
14 hearing.
15

16 DATED this 9th day of April, 2014.

17 PATRICIA A. MARR, LTD.

18 /s/Patricia A. Marr, Esq.

19
20 _____
21 PATRICIA A. MARR, ESQ.
22 Nevada Bar No. 8846
23 2470 St. Rose Parkway, Ste. 106H
24 Henderson, Nevada 89074
(702) 353-4225 (phone)
(702) 912-0088 (fax)
Lvlaw03@yahoo.com

25
26 Mailing Address:
27 9484 South Eastern Ave., #399
28 Las Vegas, Nevada 89123
Attorney for Defendant
WESLEY ALLEN LEWIS

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Nevada Supreme Court Rule 1.16 states in relevant part, as follows:

(a) Except as stated in subsection 3, a lawyer shall not represent a client or where representation has commenced, shall withdraw from the representation of a client if:

- (b) Except as stated in paragraph (c), a lawyer may withdraw from representing a client if:

- ८३

- 1 (5) The client fails substantially to fulfill an obligation to the lawyer
2 regarding the lawyer's services and has been given reasonable
3 warning that the lawyer will withdraw unless the obligation is
4 fulfilled;
5 (6) The representation will result in an unreasonable financial burden
6 on the lawyer or has been rendered unreasonably difficult by the
7 client; or
8 (7) Other good cause for withdrawal exists.
9 (c) A lawyer must comply with applicable law requiring notice to or permission
10 of a tribunal when terminating representation. When ordered to do so
11 by a tribunal, a lawyer shall continue representation notwithstanding good
12 cause for terminating the representation.
13 (d) Upon termination of representation, a lawyer shall take steps to the extent
14 reasonably practicable to protect a client's interests, such as giving
15 reasonable notice to the client, allowing time for employment of other
16 counsel, surrendering papers and property to which the client is entitled and
17 refunding any advance payment of fee that has not been earned. The lawyer
18 may retain papers relating to the client to the extent permitted by other law.

19 In the instant case, Defendant, WESLEY LEWIS, has failed to comply with his financial
20 agreement with the undersigned and failed to communicate with counsel, which prevents your
21 movant from appropriately and properly representing said Defendant in this matter.

22 The Eighth Judicial District Court Rules, Rule 7.40, Subsections (b)(2)(i) and (c)
23 provide in pertinent part as follows:

24 Appearances; Substitutions; Withdrawal or Change of Attorney.

25 (b) Counsel in any case may be changed only:

- 26 (2) When no attorney has been retained to replace the attorney withdrawing,
27 only by order of the court, at such time as may be fixed by the court in an
28 order shortening time for the hearing of the motion, and
(i) If the application is made by the attorney, he shall include in an affidavit the
address, or last known address, at which the client may be served with notice

1 of further proceedings taken in the case in the event the application for
2 withdrawal is granted, and he shall serve a copy of the application upon the
3 client and all other parties to the action or their attorneys.

- 4 (c) No application for withdrawal or substitution shall be granted if a delay of
5 the trial or of the hearing of any other matter in the case would result.

6 Further:

7 EDCR 5.31 - Shortening Time, provides:

8 Ex parte motions to shorten time may not be granted except upon an affidavit or
9 certificate of counsel, or if unrepresented, the party, describing the circumstances claimed to
10 constitute good cause and justify shortening of time. If a motion to shorten time is granted,
11 it must be served upon all parties promptly. An order which shortens the notice of a hearing
12 to less than 10 days may not be served by mail. In no event may the notice of the hearing of
13 a motion be shortened to less than 1 full judicial day.

14 Based upon the Rules cited above, and the reasons more fully set forth in the Declaration of
15 PATRICIA A. MARR, ESQ., movant respectfully requests that this Motion to Withdraw as
16 Counsel for Defendant be granted.

17 Dated this 9th day of April, 2014.

18
19 PATRICIA A. MARR, LTD.

20 /s/Patricia A. Marr, Esq.

21
22
23 PATRICIA A. MARR, ESQ.
24 Nevada Bar No. 8846
25 2470 St. Rose Parkway, Ste. 106H
26 Henderson, Nevada 89074
27 (702) 353-4225 (phone)
28 (702) 912-0088 (fax)
Lvlaw03@yahoo.com

Mailing Address:

1 9484 South Eastern Ave., #399
2 Las Vegas, Nevada 89123
3 *Attorney for Defendant*
4 *WESLEY ALLEN LEWIS*

5
6
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10
11 **DECLARATION OF PATRICIA A. MARR IN SUPPORT OF**
12 **MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT**

13 PATRICIA A. MARR, being first duly sworn under the penalties of perjury makes
14 the following Declaration and deposes and says:
15

16 That I am an attorney in good standing and duly licensed to practice law in the State of
17 Nevada.
18

19 That I was retained by Defendant to represent him in a contempt matter, specifically in
20 response to Plaintiff's Motion to hold Defendant in contempt. That the Plaintiff's hearing for
21 Plaintiff's Motion was resolved and Plaintiff has filed a new motion and an order to show
22 cause has been issued. Defendant has a significant balance with counsel and has otherwise been
23 uncommunicative rendering it extremely difficult to continue her representation of Defendant.
24

25 Further, the Defendant simply does not have the funds or otherwise have the ability to pay
26 for movant's legal services, Defendant cannot continue to pay for movant's legal service, and
27 movant cannot afford to represent Defendant without payment.
28

1 That Defendant has been advised of your affiant of my intention to withdraw as counsel
2 from this case. That the last known addresses of Defendant, WESLEY LEWIS at which
3 place he may be served with further proceedings taken in this action, in the event that this Motion
4 for Withdrawal is granted is:

5
6 4650 Idaho Street
7 Las Vegas, Nevada 89104.

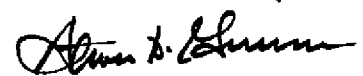
8 That Plaintiff has filed a motion to modify custody and a hearing is set for May 1, 2014, and
9 the Court has issued an order to show cause and a hearing has been set for May 21, 2014.

10 If movant is not permitted to withdraw as counsel immediately she will be adversely
11 effected financially.

12 I declare under penalty of perjury under the laws of the State of Nevada (NRS 53.045
13 and 28 U.S.C. §1746), that the foregoing is true and correct.

14 Dated this 9th day of April, 2014.

15
16
17
18 PATRICIA A. MARR, ESQ.
19
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28



CLERK OF THE COURT

1 SUB

2 PATRICIA A. MARR, LTD.

3 PATRICIA A. MARR, ESQ.

4 Nevada Bar No. 8846

5 2470 St. Rose Parkway, Ste. 106II

6 Henderson, Nevada 89074

(702) 353-4225 (phone)

(702) 912-0088 (fax)

Lvlaw03@yahoo.com

Mailing Address:

9484 South Eastern Ave., #399

Las Vegas, Nevada 89123

Attorney for Defendant

WESLEY ALLEN LEWIS

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS aka
MARIA DANIELA PERDOMO,

Plaintiff,

v.

WESLEY ALLEN LEWIS,

Defendant.

Case No. D-10-427054

Dept No. T

ACKNOWLEDGMENT OF
SUBSTITUTION IN PROPER
PERSON

COMES NOW, Defendant, WESLEY ALLEN LEWIS, and hereby substitutes himself In
Proper Person, in the place and stead of PATRICIA A. MARR, ESQ., in the above-entitled matter.

DATED this 10th day of April, 2014.


WESLEY ALLEN LEWIS

1 I, Patricia A. Marr, Esq., hereby consent to the above-substitution.
2

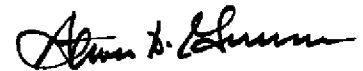
3 DATED this 10th day of April, 2014.
4

5 PATRICIA A. MARR, LTD.
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PATRICIA A. MARR, ESQ.

Nevada Bar No. 008846
2470 St. Rose Parkway, Ste. 106H
Henderson, Nevada 89074
(702) 353-4225 (telephone)
(702) 912-0088 (facsimile)

Mailing Address:
9484 South Eastern Avenue, #399
Las Vegas, Nevada
Attorney for Defendant
WESLEY ALLEN LEWIS



CLERK OF THE COURT

COS
PATRICIA A. MARR, LTD.
PATRICIA A. MARR, ESQ.
Nevada Bar No. 008846
2470 St. Rose Parkway, Ste. 106H
Henderson, Nevada 89074
(702) 353-4225 (telephone)
(702) 912-0088 (facsimile)
lvlaw03@yahoo.com
Mailing Address:
9484 South Eastern Ave., #399
Las Vegas, Nevada 89123
Attorney for Defendant,
WESLEY ALLEN LEWIS

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS aka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10-427054
Plaintiff,)	DEPT NO. I
)	
v.)	
)	
WESLEY ALLEN LEWIS)	
)	
Defendant,)	
)	

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April, 2014, I mailed via the U.S. Mail,
postage prepaid a copy of *Acknowledgement of Substitution in Proper Person* to the following:

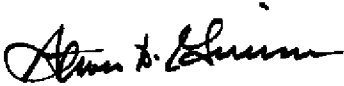
Frances Ann Fine, Esq.
Fine & Price Law Group
8975 S. Pecos Road, #5
Henderson, Nevada 89074

Wesley Allen Lewis

1 4650 Idaho Avenue
2 Las Vegas, Nevada 89104
3
4

PATRICIA A. MARR, LTD.

5
6 *Cindy Wilgren*
7 An Employee of Patricia A. Marr, LTD
8
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CLERK OF THE COURT

1 OPP
2 WESLEY ALLEN LEWIS
3 4650 Idaho Ave.
4 Las Vegas, Nevada 89104
5 (702) 432-3996 (telephone)
6 Defendant In Proper Person

7 DISTRICT COURT
8 FAMILY DIVISION
9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS aka)
11 MARIA DANIELA PERDOMO,)

12 Plaintiff,)

13 v.)

14 WESLEY ALLEN LEWIS,)

15 Defendant.)

Case No. D-10-427054

Dept No. T

Date of Hearing: 5/01/2014

Time of Hearing: 9:00 am

16 **OPPOSITION TO MOTION TO MODIFY CUSTODY; TO ENFORCE ORDER OF**
17 **DECEMBER 27, 2013 AND AN AWARD OF ATTORNEY'S FEES**
18 **AND COUNTERMOTION FOR FEES; TO ORDER THERAPY FOR PLAINTIFF;**
19 **TO HOLD PLAINTIFF IN CONTEMPT; AND FOR RELATED RELIEF**

20
21 COMES NOW, Defendant, WESLEY ALLEN LEWIS, In Proper Person and hereby files
22 files his Opposition as follows.

23 Defendant's Opposition is made and based upon the following Memorandum of Points and
24 Authorities, the pleadings and papers on file herein, and the Affidavits of Defendant, and Sid
25 Lewis.

26 Dated this 24 day of April, 2014.

27 
28 WESLEY ALLEN LEWIS,
Defendant In Proper Person

1 **POINTS AND AUTHORITIES**

2 **FACTS**

3 Defendant, WESLEY ALLEN LEWIS, and Plaintiff, MARIA PERDOMO were divorced
4 by way of Decree on July 26, 2011. Pursuant to the Decree, the parties stipulated to the joint legal
5 and physical custody of the minor child, Isabella Sarah Lewis, DOB: August 10, 2006.
6

7 After the divorce, Maria filed Chapter 7 Bankruptcy and wiped out all of her debt.
8 Consequently, all of the debt was dumped into Wesley's lap, including all of the bills associated
9 with the parties' deceased infant son. Wesley continues in his efforts to meet all of his financial
10 obligations, including the debt from the parties' marriage, however it has placed a significant
11 financial burden on him.
12

13 On or about February 27, 2013, the Child Support Court heard Wesley's request for a
14 downward modification of his child support based upon a significant decrease in his monthly
15 wages. When the Hearing Master granted Wesley's request, Maria stormed out of the court
16 room and has been on a vendetta to make Wesley "pay" in any way, shape or form that she can,
17 including now, a request to modify the joint physical custody the parties stipulated to. Maria's
18 ultimate goal is to remove Isabella from the State of Nevada, which she has already informed
19 Isabella that she is going to do.
20
21

22 Maria is not the demure, innocent girl she portrays herself to be in court. In fact, she
23 has utilized Isabella as a pawn in her never-ending quest to punish and torment Wesley ~ 3
24 years after the divorce! Moreover, Maria's goal is to relocate out of the State of Nevada and
25 therefore, a modification of custody will make that goal more achievable.
26

27 Nonetheless, it is not in Isabella's best interest that joint physical custody be modified for
28

1 many reasons. First, Maria suffers from hypothyroidism, a syndrome in which "psychiatric
2 symptoms are fairly common and may precede all other physical signs and symptoms. Typical
3 manifestations are those of mental lethargy and slowing of all cognitive functions, leading to poor
4 concentration and impairment of short-term memory. Depressive symptoms and, to some extent,
5 anxiety may commence as early as 3 weeks after the onset of hypothyroidism. Insomnia,
6 irritability and mood lability often occur. (Exhibit A).

8 Maria has a volatile, "hair-trigger" temper, which is exacerbated by her condition.¹ Despite
9 Wesley's best efforts to communicate in a way as to not upset Maria, Maria is loud, abusive,
10 uncooperative, and typically hangs up the telephone on Wesley 99% of the time that he attempts to
11 co-parent with her. Such behavior is not in Isabella's best interest, especially when it takes
12 place in front of Isabella. Moreover, it evidences Maria's refusal and/or inability to co-parent with
13 Wesley, despite his best efforts to do so.

16 Maria has lived with a multitude of men since the parties' divorce and Wesley is informed
17 that Isabella is forced to sleep with Maria and her boyfriends when Isabella is not provided with a
18 bedroom of her own. Subsequent to the divorce Maria and Isabella have lived in a one-bedroom
19 condo at the Aria Hotel with Maria's former boyfriend, Ele Sabot and another boyfriend, Kevin
20 Little John in a one bedroom condo on East Flamingo. Maria's and her current boyfriend, Juan
21 Fuente, only recently moved into a 2 bedroom condo after previously living in a one bedroom
22 condo. Isabella informed Wesley that the 3 of them shared the same bed, but that Juan had his own
23 blanket.

26 Wesley denies the false assertions raised in Maria's motion:
27

28

¹ Maria's condition causes her to act very irritable and she often acts violently at any given moment.

1. Maria asserts that Wesley refuses to communicate and co-parent with her, however, the converse is accurate. Maria refuses to communicate and co-parent with Wesley, including but not limited to: refusing to answer his telephone calls and refusing to consult with Wesley regarding health care and education decisions for Isabella. Wesley is typically only informed of Maria's unilateral decisions after the fact;
2. Wesley continues to assist Isabella with her homework – as he has historically done. Isabella currently has straight A's in school and continues to excel in all subjects (Exhibit B);
3. Isabella does not miss school to "care for her sick father";
4. The assertion that Wesley "continues to sleep with the child each night" is completely false. Isabella has her own room at Wesley's home and continues to sleep, alone, in her room;
5. Wesley is not neglecting Isabella's health needs or refuse to follow the directives of her providers. The only time that Isabella appears to be sick is while she is in Maria's care. Recently, Wesley did inquire as to whether Isabella needed to seek the doctor when she said her head hurt. Isabella's response was "No, my mom takes me to the doctor every Thursday, Friday, Saturday and Sunday so I don't need to." In any event, Isabella has generally remained in Maria's care while sick. Pursuant to the doctor's directives, Isabella is now taking showers instead of baths while in Wesley's care;
6. Maria's assertion that Wesley will not participate in treatment despite specific requests of her counselor is also untrue. (Exhibit C);
7. Notably, Warren Wheatley, who is not a licensed medical doctor, opines that Isabella went from having a rash on her to having strep throat, which may have been the cause of neglect. Again, Mr. Wheatley is *not* a licensed medical doctor and his *unsupported speculation* is questionable at best;
8. With respect to the financial issues, Wesley is paying what he is able to afford; Wesley made a \$200 payment on February 26, 2014, a \$500 payment on April 18, 2014, and will make a \$500 payment on April 25, 2014. Wesley attempted to make payments for Kumon at the Child Support Office, but was rejected.

Wesley has not "thumbed his nose at the Court's orders and takes his obligations to Isabella seriously. However, Wesley does not have a millionaire step-father to fund expensive, specious litigation like Maria and is simply doing the best he can within his financial means.

ARGUMENT

IT IS NOT IN ISABELLA'S BEST INTEREST TO MODIFY CUSTODY.

NRS 125.480 provides:

1 **NRS 125.480 Best interests of child; preferences; presumptions when court determines**
2 **parent or person seeking custody is perpetrator of domestic violence or has committed act of**
3 **abduction against child or any other child.**

4 1. In determining custody of a minor child in an action brought under this chapter, the sole
5 consideration of the court is the best interest of the child. If it appears to the court that joint custody
6 would be in the best interest of the child, the court may grant custody to the parties jointly.

7 2. Preference must not be given to either parent for the sole reason that the parent is the
8 mother or the father of the child.

9 3. The court shall award custody in the following order of preference unless in a particular
10 case the best interest of the child requires otherwise:

11 (a) To both parents jointly pursuant to NRS 125.490 or to either parent. If the court does not
12 enter an order awarding joint custody of a child after either parent has applied for joint custody, the
13 court shall state in its decision the reason for its denial of the parent's application.

14 (b) *To a person or persons in whose home the child has been living and where the child has*
15 *had a wholesome and stable environment.*

16 (c) To any person related within the fifth degree of consanguinity to the child whom the court
17 finds suitable and able to provide proper care and guidance for the child, regardless of whether the
18 relative resides within this State.

19 (d) To any other person or persons whom the court finds suitable and able to provide proper
20 care and guidance for the child.

21 4. In determining the best interest of the child, the court shall consider and set forth its
22 specific findings concerning, among other things:

23 (a) The wishes of the child if the child is of sufficient age and capacity to form an intelligent
24 preference as to his or her custody.

25 (b) Any nomination by a parent or a guardian for the child.

26 (c) *Which parent is more likely to allow the child to have frequent associations and a*
27 *continuing relationship with the noncustodial parent.*

28 (d) The level of conflict between the parents.

(e) *The ability of the parents to cooperate to meet the needs of the child.*

(f) *The mental and physical health of the parents.*

(g) *The physical, developmental and emotional needs of the child.*

(h) *The nature of the relationship of the child with each parent.*

(i) The ability of the child to maintain a relationship with any sibling.

(j) Any history of parental abuse or neglect of the child or a sibling of the child.

(k) Whether either parent or any other person seeking custody has engaged in an act of
domestic violence against the child, a parent of the child or any other person residing with the
child.

(l) Whether either parent or any other person seeking custody has committed any act of
abduction against the child or any other child.

(b) *To a person or persons in whose home the child has been living and where the child has had*
a wholesome and stable environment.

Isabella enjoys a wholesome and stable environment while in Wesley's care, while

1 conversely, she is subjected to a multitude of strange men and subjected to her mother's relations
2 when she must live in a one bedroom condo. Despite sharing a bed with her mother and various
3 men, Isabella has exclaimed that "he has his own blanket!" Such conduct is not in the best interest
4 of impressionable Isabella.
5

6 ***(c) Which parent is more likely to allow the child to have frequent associations and a continuing***
7 ***relationship with the noncustodial parent.***

8 Maria has historically demonstrated that she is the parent least likely to allow Isabella to
9 have a continuing relationship with Wesley. Her recent conduct of contacting the police in an
10 attempt to tear Isabella from Wesley during his timeshare and horrifying Isabella is part and parcel
11 of her pattern of behavior, including but not limited to the filing of her instant motion.
12

13 ***(e) The ability of the parents to cooperate to meet the needs of the child.***

14 Maria has further demonstrated that she is unwilling to co-parent with Wesley, including
15 but not limited to, unilaterally making decisions regarding Isabella's health and education without
16 consulting with Wesley and only telling him about her decisions after she has implemented them;
17 verbally abusing Wesley in front of Isabella; calling the police without a basis and subjecting
18 Isabella to emotional trauma; refusing to answer her own daughter's telephone calls; and otherwise
19 continually behaving in a narcissistic manner. Such behavior is not in the best interest of Isabella.
20

21 ***(f) The mental and physical health of the parents.***

22 Wesley submits that Maria's mental health is questionable, in addition to her volatile
23 temper, which is not in Isabella's best interest.
24

25 ***(g) The physical, developmental and emotional needs of the child.***

26 Isabella is young and impressionable and Maria's constant attempts to create drama in the
27 parties' lives is adversely affecting her.
28

1 ***(h) The nature of the relationship of the child with each parent.***

2 Isabella has a wonderful relationship with Wesley who continues to nurture her and provide
3 her with a stable and wholesome environment. Isabella feels safe when she is with Wesley, whose
4 sole focus has been on her upbringing. Apparently, Isabella's relationship with Maria is not as
5 good, as Maria recently confessed that Isabella acts out while in her care, by biting her and slapping
6 her. Clearly, Isabella is exhibiting anger toward Maria, which is not in Isabella's best interest and
7 warrants further investigation as to why Isabella has such anger and contempt for Maria.
8
9

10 **WESLEY SHOULD BE AWARDED HIS ATTORNEY'S FEES FOR HAVING TO**
11 **RESPOND TO MARIA'S SPECIOUS MOTION.**

12 NRS 18.080 provides:

- 13 1. The compensation of an attorney and counselor for his or her services is governed by
14 agreement, express or implied, which is not restrained by law.
15 2. In addition to the cases where an allowance is authorized by specific statute, the court may
16 make an allowance of attorney's fees to a prevailing party:
17 (a) When the prevailing party has not recovered more than \$20,000; or
18 (b) Without regard to the recovery sought, when the court finds that the claim, counterclaim,
19 cross-claim or third-party complaint or defense of the opposing party was brought or maintained
20 without reasonable ground or to harass the prevailing party. The court shall liberally construe the
21 provisions of this paragraph in favor of awarding attorney's fees in all appropriate situations. It is
22 the intent of the Legislature that the court award attorney's fees pursuant to this paragraph and
23 impose sanctions pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all appropriate
24 situations to punish for and deter frivolous or vexatious claims and defenses because such claims
25 and defenses overburden limited judicial resources, hinder the timely resolution of meritorious
26 claims and increase the costs of engaging in business and providing professional services to the
27 public.
28 3. In awarding attorney's fees, the court may pronounce its decision on the fees at the conclusion
of the trial or special proceeding without written motion and with or without presentation of
additional evidence.
4. Subsections 2 and 3 do not apply to any action arising out of a written instrument or agreement
which entitles the prevailing party to an award of reasonable attorney's fees.

29 Maria's quest to undermine Wesley's parenting skills is motivated by nothing more than her
30 plan to leave the State of Nevada and otherwise based on sheer retribution. Wesley should be

1 awarded all fees incurred as a result of her conduct.

2 **MARIA FAILED TO COMPLY WITH EDCR 5.11 BEFORE FILING HER**
3 **MOTION.**

4 **WESLEY MAY NOT BE HELD IN CONTEMPT FOR HIS INABILITY TO PAY.**

5 In Rodriguez v. The Eighth Judicial District Court, 120 Nev. 798 (2004) the Nevada

6 Supreme Court held:

7
8 While the determination of a party's indigency status is generally within the trial court's
9 sound discretion and, therefore, entitled to great deference on review, it is also subject to
10 careful scrutiny when it involves the protection of basic constitutional rights.

11 Id.

12 It further held:

13 A party cannot be found guilty of contempt for failing to pay child support and sentenced to
14 jail conditional upon his payment of arrearages unless the trial court first determine that the
15 individual (1) has the ability to make the payment and (2) willfully refuses to pay.

16 Id.

17 Yet further, the Court held:

18 In determining whether an indigent party in a **contempt** proceeding based on nonpayment
19 of child support has a due process right to appointment of counsel, after balancing each of
20 the due process elements against the other, they as a whole are measured against the
21 presumption that a right to appointed counsel arises only when the indigent party may lose
22 his personal freedom. U.S.C.A. Const.Amend. 14.

23 The need for appointed counsel in a civil **contempt** proceeding for nonpayment of child
24 support turns on an initial determination of indigency, for unless a party is truly indigent,
25 the State need not provide representation; if an indigent party faces the threat of possible
26 incarceration for the nonpayment of child support, the court should then seek to balance the
27 private liberty interest at stake, the government's interest, and the risk of an erroneous
28 finding, *taking into account the complexity of the legal and factual issues and the party's
ability to effectively communicate on his own behalf.*

As a matter of law, Wesley cannot be held in contempt of court for his inability to pay.

1 Thus, Maria's motion to hold Wesley should be denied.

2 **COUNTERMOTION**

3 **MARIA SHOULD BE HELD IN CONTEMPT FOR HER REFUSAL TO CO-**
4 **PARENT AND KEEP WESLEY APPRISED OF HER ADDRESS.**

5 NRS 1.210(3) provides that this Court has the power to compel obedience to its orders and
6 NRS 22.010(3) provides that the refusal to abide by a lawful order issued by the Court is contempt.

7
8 The Decree incorporates the Parenting Agreement that provides the parties are to provide
9 each other with the address and telephone number where Isabella resides. Further, the parents
10 agree to notify each other and the Clerk of the Court in writing at least ten (10) days prior to
11 changing residences, phone number, or employment. (Page 2, lines 8-20, Parenting Agreement).
12 However, Maria has consistently failed and otherwise refused to do so.
13

14 **MARIA VERBALLY ABUSES WESLEY IN FRONT OF ISABELLA, REFUSES TO**
15 **COMMUNICATE WITH WESLEY REGARDING ISABELLA AND DISCUSSES**
16 **PARENTAL ISSUES WITH ISABELLA.**

17 The Parenting Agreement also provides that the parents are not to verbally abuse each other
18 in front of the child, communicate directly regarding the child's needs and not to use the child as
19 a communicator regarding parental issues. (Parenting Agreement, page 5, lines 23-27).
20

21 Maria continues to carry a lot of resentment toward Wesley and has historically verbally
22 abused Wesley in front of Isabella, refuses to communicate with Wesley and involves Isabella in
23 parental matters. For example, on February 26, 2014, Isabella missed school because Wesley
24 had unexpected car problems and was unable to secure alternate transportation. Isabella's school is
25 approximately 18 miles from Wesley's home. When Maria telephoned Wesley that day, he missed
26 her call but returned it approximately 20 minutes later. At no times did Maria question or express
27 concern as to Wesley's ability to provide school transportation the following day.
28

1 Moreover, contrary to Maria's assertion that she became alarmed because she heard Isabella
2 crying in the background – Isabella was not crying. But, Isabella was later moved to hysteria
3 during a cell phone call with Maria when Maria threatened to remove her from Wesley's custody.
4 At that point Maria informed Wesley that she was coming to his home to "take Isabella" with
5 complete disregard of the fact that Wesley's visitation should not have concluded until the next day
6 at school.
7

8 Afterward, Maria immediately ceased further communication with Wesley by not
9 answering repeated phone calls, which caused alarm to Isabella. Nonetheless, Maria demonstrated
10 a callous disregard for any resolution through constructive conversation and instead, involved law
11 enforcement under the false pretenses that she was concerned for Isabella's welfare. Further,
12 Maria's refusal to answer Isabella's phone calls after telling her she was coming to "take her"
13 affected Isabella's mental and emotional state, which was obvious when she cried and pleaded
14 with Maria during her initial phone call "No mommy, please, I want to stay with Daddy." Instead
15 Maria hung up on Isabella which was evident because Isabella could be heard saying "Mommy?
16 Mommy are you there? Despite Isabella's immediate and repeated phone calls to Maria, Maria
17 refused to answer her calls, thereby escalating Isabella's anxiety.
18

19 Even though it was not her timeshare, Maria arrived at Wesley's home at approximately 4
20 pm that same day with her current boyfriend, Juan Gabriel. She arrived accompanied by 2 police
21 cars. Wesley was in route to return to his residence after making a child support payment to the
22 Child Support Division when he was stopped by the police. Wesley explained that when Isabella
23 saw the police at Wesley's home Isabella became hysterical despite Wesley's attempts to calm and
24 reassure her that everything was going to be okay.
25
26
27
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1 When Wesley and Isabella arrived at home Isabella demonstrated considerable anger and
2 frustration with Maria for involving the police and yelled at Maria "Why did you call the police!"
3 Maria confided to Wesley that Isabella has a history of anger and physical aggression toward her by
4 hitting and biting her, which had never been previously disclosed to Wesley. It was only then that
5 Maria disclosed to Wesley that she had sought counseling for Isabella. Isabella does not display
6 such behavior while in Wesley's care.
7

8
9 It is noteworthy that Maria had requested Wesley accompany them to counseling, however,
10 the reason for the family counseling was not attributed to aggression on behalf of Isabella.
11 Nonetheless, when Wesley made arrangements to attend the counseling, Maria provided him with
12 less than 24 hour notice, claimed the appointment had been changed and the doctor would not
13 reschedule. Maria's failure to work with Wesley's schedule is nothing more than a deliberate effort
14 to portray Wesley in an unsupportive light. (Exhibit D).
15

16
17 With the new insight as to the reasons behind Isabella's behavior Wesley and his family
18 used Bible based reasoning and love to help Isabella understand that she should love and respect
19 her mother even when her mother upsets her. This appears to have had a significant impact on
20 Isabella because when Wesley met with Dr. Warren Wheatley on April 1, 2014, he informed
21 Wesley that he was going to recommend to Maria that Isabella no longer needed family counseling.
22

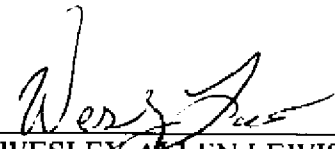
23 In sum, Maria an order should issue as to why Maria should not be held in contempt for her
24 continued conduct, which is in complete disregard of the Court's orders.
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CONCLUSION

Based upon the above, Maria's motion should be denied and Wesley's countermotion should be granted.

Dated this 24 day of April, 2014.


WESLEY ALLEN LEWIS,
Defendant In Proper Person

DECLARATION OF WESLEY ALLEN LEWIS

WESLEY ALLEN LEWIS, being first duly sworn under the penalties of perjury makes the following Declaration and deposes and says:

That I am the Defendant in the above-referenced action;

That I have read the Opposition and know the contents thereof; that the same is true of my own knowledge, except as to those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true.

WHEREFORE, it is respectfully requested that this Court deny Maria's motion and grant my countermotion.

I declare under penalty of perjury under the laws of the State of Nevada (NRS 53.045 and 28 U.S.C. §1746), that the foregoing is true and correct.


WESLEY ALLEN LEWIS

GENERAL AFFIDAVIT

Dated this 22^{ed} day of April, 20 14.

BEING FIRST DULY SWORN, deposes and says: I Sidney A. Lewis Am The Defendant's Father of Isabella's Grandfather. For the Record To Inform the Court that for The time that I have known Maria Pendergast which is Approximately 8 years. She has Never changed, She has Always been Argumentative. I do believe She Never Wants to get Married to my son AS She was Already Married to Some one else. She Never Seems to be happy Even With her own parents, by the way She talks to them. We worry - my wife & I that The Safety of Isabella is in danger (More ways than one) She has Lived in 6 different places in 2 1/2 yrs with 4-5 different Males. She does not tell the Truth, She would never tell us where She Lived or with who I do believe it is scaring Isabella now that She is Almost 8 yrs old - She Seems Confused AS to how many daddys She has. *Note* She Made Me Promise to Never Sell My house, She says She feels safe here. *We love her but we ARE NOT baby sitters.*
IN WITNESS WHEREOF, I We have hereunto set my hand/four hands this 22 day of April, 20 14.

Sidney A. Lewis
Signature of Affiant

X
Signature of Affiant

Sidney A. Lewis
Print or Type name here

X
Print or Type name here

STATE OF _____)
COUNTY OF _____)
SWORN TO AND SUBSCRIBED to before me by _____
on this _____ day of _____, 20 _____.

Notary Public
My commission expires: _____
Consult an attorney if you doubt this forms fitness for your purpose.

AFF100mk

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EXHIBIT A

HYPERTHYROIDISM

Hyperthyroidism refers to a syndrome resulting from excessive production of thyroid hormones. The condition can be caused by several diseases, such as thyroid tumors, inflammation, and spontaneous diffuse overactivity of the gland. Severe stress, and acute emotional disturbances have been implicated in precipitating hyperthyroidism as well (Michael & Gilhous, 1963). Common physical signs and symptoms include fatigue, palpitations, tremor, diarrhea, weight loss despite increased appetite, excessive sweating, intolerance of warm temperatures, and hemoptysis (increased menstrual blood flow). In cases of Graves' disease, prominent proptosis (exophthalmos or protrusion of the eyes) may occur. The gland may or may not be enlarged. The disease affects females more than males in a ratio of 6 to 1, and occurs most commonly during the second and third decades of life (Fishman, 1967).

Psychiatric manifestations of hyperthyroidism include restlessness, irritability, overactivity, and emotional lability. Distractibility, impaired concentration, and difficulty with recent memory may occur as well (Whitrow, Prange & Treadway, 1968). In some cases, severe anxiety and manic symptoms can develop. The symptoms can be identical to those encountered in "primary" disorders to the point that misdiagnosis is fairly common. Symptoms of mood disorders can also occur, especially mania and, less frequently, depression. Symptoms of psychosis with hallucinations and delusions that can resemble schizophrenia have also been reported (Greer & Parsons, 1966). Careful differential diagnosis should be undertaken, and the diagnosis is usually confirmed by specific laboratory tests that show elevation of thyroid hormones. Treatment should focus on the underlying cause by administering antithyroid drugs. Usually, most neuropsychiatric symptoms reverse with antithyroid treatment, although a full year may be needed before complete recovery is attained (Goldman, 1992). Symptomatic treatment with anxiolytic

Exhib: 6:7

and antipsychotic agents may be required, and is often very effective.

HYPOTHYROIDISM

Hypothyroidism or myxedema refers to a syndrome resulting from decreased production of thyroid hormones. The condition can be caused by autoimmune disorders, ablation of the gland as a result of surgery or radioactive treatment, and, in some cases, long-term lithium therapy. Common signs and symptoms include sluggishness, low energy level, vague generalized aches, muscle weakness, slow pulse, weight gain despite diminished appetite, intolerance to cold temperatures, constipation, menorrhagia (increased menstrual blood flow) in females, and impotence in males. The skin becomes dry with a puffy complexion. The eyelids are baggy due to the edema which involves the face and limbs. Hair loss often occurs, and its texture is usually lank and dry. Speech is slow and the voice is coarse and toneless. The gland may or may not be enlarged. Reflexes are often diminished. The disease occurs more frequently in females than in males in a ratio of 8 to 1, and is more common during middle age (Fishman, 1967).

Psychiatric symptoms are fairly common and may precede all other physical signs and symptoms. Typical manifestations are those of mental lethargy and slowing of all cognitive functions, leading to poor concentration and impairment of short-term memory. There is profound loss of interest and initiative, with a tendency towards apathy. In severe or long-standing cases, marked dementia develops and patients report losing things and making "stupid" mistakes (Goldman, 1992). Depressive symptoms and, to some extent, anxiety may commence as early as three weeks after the onset of hypothyroidism (Denicoff et al., 1980). Insomnia, irritability, and mood lability often occur. Psychosis is usually nonspecific and often involves

11dinh

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Psychosis
Symptoms

EXPIRA

EXHIBIT B

Art	Satisfactory progress	Satisfactory progress	
Humanities	Satisfactory progress	Exceptional progress	
Library	Exceptional progress	Exceptional progress	
Music	Exceptional progress	Exceptional progress	
PE	Exceptional progress	Exceptional progress	
Observes School Rules	Exceptional progress	Exceptional progress	
Follows Classroom Rules	Exceptional progress	Satisfactory progress	
Follows Directions	Satisfactory progress	Satisfactory progress	
Accepts Responsibility	Satisfactory progress	Satisfactory progress	
Works Independently	Exceptional progress	Exceptional progress	
Works Cooperatively	Exceptional progress	Exceptional progress	
Completes and Returns Homework on Time	Satisfactory progress	Satisfactory progress	
Quality of Work	Exceptional progress	Exceptional progress	
Days Absent	2	5	
Times Tardy	6	8	
Days Present	63	53	

Knowledge of Work - Overall summary grade for content area.
A- 90-100% mastery of grade level standard
B- 80-89% mastery of grade level standard
C- 70-79% mastery of grade level standard
D- 60-69% mastery of grade level standard
F- Below 60% mastery of grade level standard
W- Working on standards below grade level (see attachment)

**Special Subjects and
Learner Behaviors**
Exceptional progress
Satisfactory progress
Needs improvement

Isabella scored 53 wpm on the AIMSweb assessment, which is above-grade level. In order to challenge her, she is currently reading beginner chapter books with her reading group. We have discussions about the plot, characters, and setting and she is able to contribute to the group. She enjoys reading to the class and picks out wonderful books we like to hear. Occasionally, Isabella needs reminders to complete unfinished school work or centers in her desk folder. She can work on being more responsible by completing this in a more timely manner and without being told. Isabella is a kind, polite girl who consistently follows directions and classroom rules. She is also a straight-A student.

This trimester, Isabella scored 112 wpm on the AIMSweb assessment, which is well-above grade level. Her reading group continues to read beginner chapter books and has discussions about what was read. She continues to show enthusiasm with reading to the class. Lately, Isabella has had a difficult time answering questions during Saxon Phonics and can be easily distracted. Many times throughout the day, I will catch her looking from behind, while she is supposed to be completing assignments at her desk. She requires more time to complete seat work compared to others and needs redirection. Isabella takes pride in her writing and completes amazing illustrations. She shows a lot of passion with art. She lights up and is excited to share her accomplishments with classmates. Isabella is an A-B Honor Roll student.

Gail Burgess

Teacher's Signature

Dad

STUDENT PROGRESS REPORT

Wednesday, April 02, 2014

Lewis, Isabella

Ms. Burgess

Twitchell Elementary School

Grade Summary	Overall
Language	187.8/200 = 94% A
• Category: NA	187.8/200 = 94% A
Mathematics	680/700 = 97% A
• Category: NA	680/700 = 97% A
Reading	540/600 = 90% A
• Category: NA	540/600 = 90% A
Science/Health	300/300 = 100% A
• Category: NA	300/300 = 100% A
Social Studies	280/300 = 93% A
• Category: NA	280/300 = 93% A
Speaking and Listening	180/200 = 90% A
• Category: NA	180/200 = 90% A
Writing	400/400 = 100% A
• Category: NA	400/400 = 100% A

Kumon North America
Certificate
of

This is to certify that Isabella Lewis
has successfully completed Kumon Level A1 in Reading
and has exhibited the necessary aptitude in the subject
to meet the Kumon proficiency requirements.

KUMON

12/2/13
Date
[Signature]
Kumon Instructor

EXHIBIT C



Maria Daniela Perdomo <perdomomda@gmail.com>

Isabella's DR. Appointment

2 messages

Wesley Lewis <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 1:12 PM

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Maria if you could please give proper notice for me to attend Isabella's doctors appointments I rescheduled my schedule to attend her appointment on the fourth you did not inform me that the DR. canceled the 4th and rescheduled it for the fifth at 2:30 which gave me exactly around what 16 hours notice after I did send you text messages and I did try to call Isabella's phone. You sent me a email at 7:38 PM after I send you text messages at 6:00 PM to wonder where this doctors office was you respond in ways that are not helpful to coparenting please all I'm asking is consideration for others

Sent from Wesley Lewis

Maria Daniela Perdomo <perdomomda@gmail.com>

Sat, Oct 5, 2013 at 2:42 PM

To: juanfuentes@gmail.com

Sent from my iPhone

Begin forwarded message:

From: Wesley Lewis <info4WLewis@yahoo.com>

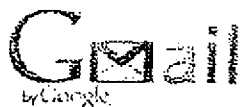
Date: October 5, 2013, 1:12:13 PM PDT

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Subject: Isabella's DR. Appointment

Maria if you could please give proper notice for me to attend Isabella's doctors appointments I rescheduled my schedule to attend her appointment on the fourth you did not inform me that the DR. canceled the 4th and rescheduled it for the fifth at 2:30 which gave me exactly around what 16 hours notice after I did send you text messages and I did try to call Isabella's phone. You sent me a email at 7:38 PM after I send you text messages at 6:00 PM to wonder where this doctors office was you respond in ways that are not helpful to coparenting please all I'm asking is consideration for others

Sent from Wesley Lewis



Maria Daniela Perdomo <perdomomda@gmail.com>

Respectful parenting and proper advance notice of appointment changes

2 messages

Wesley Lewis <info4WLEwis@yahoo.com>

Sat, Oct 5, 2013 at 2:27 PM

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Maria I called the doctors office Dr. Wheatley's office and they're not open on the weekends so if I'm not able to even get in contact with the doctor on my own account to understand how this appointment was rescheduled after being canceled due to the doctors personal reasons I feel it's in best interest if it would be rescheduled at a different time where everybody could attend and I can contact the doctor on the day of their operational hours I don't know how this doctor is at his office when the office is closed it makes it rather frustrating on my side due to the short notice and due to lack of communication thanks again

Regards

Wesley Lewis

Sent from Wesley Lewis

Maria Daniela Perdomo <perdomomda@gmail.com>

Sat, Oct 5, 2013 at 2:41 PM

To: juanfuentec@gmail.com

Sent from my iPhone

Begin forwarded message:

From: Wesley Lewis <info4WLEwis@yahoo.com>

Date: October 5, 2013, 2:27:12 PM PDT

To: "perdomomda@gmail.com" <perdomomda@gmail.com>

Subject: Respectful parenting and proper advance notice of appointment changes

[Quoted text hidden]

2/27/14 11:30 PM



Maria Daniela Perdomo <perdomomda@gmail.com>

Confirmation for Isabella's appointment

2 messages

Maria Daniela Perdomo <perdomomda@gmail.com>

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Sat, Oct 5, 2013 at 11:41 AM

Correction, Isabella's appointment is at 3:00 pm today not at 2:30. We hope to see you there. Please confirm if you can attend.

Sincerely,
Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>

Date: October 4, 2013, 7:36:57 PM PDT

To: Wesley Allen Lewis 7023401221 <info4WLewis@yahoo.com>

Subject: Isabella's Psychologist Appointment has changed

Wesley,

Please be aware that Warren Wheatley canceled this afternoon's appointment on the last minute, due to personal reasons. He reschedule for tomorrow after 2:30 pm.

I have not receive any confirmation of your assistance, please let me know if you will be able to attend tomorrow. If you cannot, Warren will contact you directly to schedule a meeting.

Sorry for any inconveniences this may cause.

Sincerely,

Maria

Sent from my iPhone

Begin forwarded message:

From: Maria Daniela Perdomo <perdomomda@gmail.com>

Date: September 29, 2013, 7:18:45 PM PDT

To: Wesley Allen Lewis <info4WLewis@yahoo.com>

Subject: Fwd: Isabella's Psychologist Appointment

Wesley,

EXHIBIT D

State of Nevada
State Collection and Disbursement Unit (SCaDU)

Receipt of Payment

Received Date/Time : Apr 18, 2014 12:59:41 PM

Pay Source : NCP

Received By : sdunn

Pay Type : Cash

Receipt Number : 201470010679

Check/Debit Auth # : Cash

Received From (Payor) : LEWIS WESLEY

#	Case Name	NCP SSN	NCP UPI	Office Code	Docket/Case #	Amount
1	LEWIS WESLEY	530947093	800342200	02		500.00
					Total Payment Amount (\$) :	500.00

Notes :

1.

PAID

State of Nevada
State Collection and Disbursement Unit (SCaDU)

Receipt of Payment

Received Date/Time : Feb 26, 2014 2:12:24 PM

Pay Source : NCP

Received By : csedillo

Pay Type : Cash

Receipt Number : 201470004994

Check/Debit Auth # : CASH

Received From (Payor) : LEWIS WESLEY

#	Case Name	NCP SSN	NCP UPI	Office Code	Docket/Case #	Amount
1	LEWIS WESLEY	530947093	800342200	02		200.00
					Total Payment Amount (\$) :	200.00

Notes :

1.

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Maria Daniela Perdomo
Plaintiff/Petitioner)

-vs-

Wesley Lewis
Defendant/Respondent)

CASE NO. D-10-427054DEPT. No. 1

**FAMILY COURT MOTION/OPPOSITION
FEE INFORMATION SHEET (NRS 19.0312)**

Party Filing Motion/Opposition: ☐ Plaintiff/Petitioner ☒ Defendant/Respondent

MOTION FOR/OPPOSITION TO Motion

Notice

**Motions and Oppositions to
Motions filed after entry of
final Decree or Judgment
(pursuant to NRS 125,
125B & 125C)
are subject to the Re-open
Filing Fee of \$25.00, unless
specifically excluded.
(See NRS 19.0312)**

Excluded Motions/Oppositions

- ☐ Motions filed before final Divorce/Custody Decree entered
(Divorce/Custody Decree NOT final)
- ☐ Child Support Modification ONLY
- ☐ Motion/Opposition For Reconsideration (Within 10 days of Decree)
Date of Last Order _____
- ☐ Request for New Trial (Within 10 days of Decree)
Date of Last Order _____
- ☐ Other Excluded Motion _____
(Must be prepared to defend exclusion to Judge)

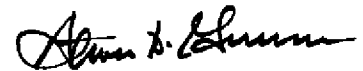
NOTE : If no boxes are checked, filing fee **MUST be paid.**

☒ Motion/Opp IS subject to \$25.00 filing fee ☐ Motion/Opp IS NOT subject to filing fee

Date: 4-24, 2014

Wesley Lewis
Printed Name of Preparer

Wesley Lewis
Signature of Preparer



CLERK OF THE COURT

1 RPLY
2 The Fine & Price Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@finepricelaw.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10-427054-D
Plaintiff,)	DEPT. NO. T
)	
vs.)	DATE OF HEARING: 5-1-14
)	TIME OF HEARING: 9:30 a.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO MOTION TO
MODIFY CUSTODY; TO ENFORCE ORDER OF DECEMBER 27, 2013 AND
AN AWARD OF ATTORNEY'S FEES AND COUNTERMOTION FOR FEES; TO
ORDER THERAPY FOR PLAINTIFF; TO HOLD PLAINTIFF IN CONTEMPT
AND FOR RELATED RELIEF

19 COMES NOW Plaintiff, MARIA DANIELA PERDOMO, by and
20 through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price
21 Law Group, and submits her Reply to Defendant's opposition and
22 counter-motion filed on April 24, 2014.

POINTS AND AUTHORITIES

I. DEFENDANT'S FILING IS A FUGITIVE DOCUMENT

24 The pending motion by Plaintiff (hereafter "MARIA") was
25 filed on March 19, 2014. A file-stamped copy of same was served
26 upon counsel of record for Defendant (hereafter "WESLEY") by mail
27 on March 25, 2014. Accordingly, WESLEY's opposition to the motion

1 was required to be served and filed by April 11, 2014, pursuant to
2 EDCR 2.20. A purported opposition and countermotion filed by
3 WESLEY in Proper Person was filed and served on April 24, 2014.

4 The document WESLEY filed in Proper Person on April 24,
5 2014 is a fugitive document because he had no standing to do so.
6 At the time of the filing of MARIA's motion, PATRICIA A. MARR,
7 ESQ., was WESLEY's attorney of record **and that remains the case.**
8 The mere filing of the document entitled "Acknowledgment Of
9 Substitution In Proper Person" on April 14, 2014 does not change
10 that fact.

11 EDCR 7.40 is very clear as to the procedure that must be
12 followed for the withdrawal or change of an attorney. When there
13 are pending proceedings (as was the case here), if there is no new
14 counsel substituting in, counsel may be changed only "by order of
15 the court, granted upon written motion". That procedure has not
16 been followed, and therefore the April 24, 2014 filing is a
17 fugitive document that should be disregarded by the Court.

18 Even if WESLEY had the standing to independently file
19 documents in this case, the opposition and countermotion was filed
20 13 days late and served upon MARIA's counsel late in the afternoon
21 of April 24, 2014. This service was a mere four judicial days
22 before the hearing and prevents MARIA from filing a timely Reply
23 thereto. Accordingly, the untimeliness of the April 24, 2014
24 filing renders WESLEY's document a fugitive document that should be
25 disregarded by the Court.

26 **II. ORDER TO SHOW CAUSE ARGUMENTS SHALL BE MADE ON MAY 21, 2014**

27 WESLEY's April 24, 2014 filing contains some argument
28 that addresses the issue of his actions and inactions that render

1 him subject to being held in contempt of court. As this Court is
2 well aware, the hearing on the pending Order To Show Cause is
3 scheduled for May 21, 2014 at 2:00 p.m., and it is at that hearing
4 that this argument will be refuted. This Reply will only address
5 facts and arguments relevant to the relief sought in MARIA's motion
6 filed on March 19, 2014 and the countermotion with the document
7 filed by WESLEY on April 24, 2014.

8 **III. RESPONSE TO WESLEY'S FALSE AND IRRELEVANT ALLEGATIONS**

9 WESLEY's opposition and countermotion does what most
10 litigants do when confronted with their own actions and the legal
11 impact of same. It attempts to create a smokescreen with a myriad
12 of false and irrelevant factual allegations to seek to avert the
13 Court's eyes from the truth. MARIA was married on Friday, April
14 25, 2014. That fact, plus the untimely filing of WESLEY's
15 opposition and countermotion, prevents the attaching of her
16 affidavit to this Reply. She will be present in open court to
17 attest to the following statements.

18 The Court's time will not be wasted by a detailed
19 discussion of allegations WESLEY makes concerning the parties
20 dating back from before the Evidentiary Hearing conducted last year
21 to before the parties were even divorced. The allegations are
22 nearly uniformly false, and they clearly have no relevance to the
23 issues before the Court now.

24 WESLEY's attempt to insert into this hearing MARIA's
25 hypothyroidism that was induced during her pregnancy and then
26 treated is laughable. The same is true of his (or his father's)
27 "armchair psychiatry". It is MARIA who communicates with WESLEY
28 via emails in a respectful manner and who makes sure that if she is

1 going to meet him, she makes sure that the police or another
2 witness is present. The allegations of boyfriends, sleeping
3 arrangements and residences are untrue. The Court will note that
4 all WESLEY offers are claims without proof.

5 On page 4 of his opposition and countermotion WESLEY at
6 least makes allegations that have some relevance, if not truth.
7 These eight items are briefly addressed as follows:

8 (1) As reflected in MARIA's motion, she does in
9 fact communicate with WESLEY. As to his claim that MARIA
10 informs him of decisions after the fact, WESLEY never has
11 wanted to take an active part in ISABELLA's health or
12 educational decisions. If MARIA has not taken action,
13 nothing gets done.

14 (2) The report card attached to WESLEY's opposition
15 and countermotion shows a decrease in reading, language
16 and mathematics from the first semester. While MARIA
17 provides assistance to ISABELLA, WESLEY does nothing to
18 assist her with homework.

19 (3) While WESLEY may argue that ISABELLA does not
20 miss school to "care for her sick father", the truth is
21 that her teacher heard ISABELLA saying this.

22 (4) ISABELLA informs her mother that she continues
23 to sleep in the same room with WESLEY, in a different bed
24 next to WESLEY's bed. Their house has three bedrooms,
25 and the third is a storage room.

26 (5) Over the last weeks ISABELLA has been sick
27 numerous times, and MARIA has been the one making doctor
28 appointments and caring for her. MARIA has provided
WESLEY with a second insurance card, but he does not take
ISABELLA to the doctor when needed.

(6) WESLEY attaches to his opposition and
countermotion alleged proof of his involvement in
ISABELLA's counseling. The truth is that he decided to
attend a session a week after receiving MARIA's motion in
a transparent attempt to change the record and show some
involvement in ISABELLA's care.

(7) ISABELLA was intermittently sick over a period
of two months, and during sessions Mr. Warren knew of the
situation and decided to include it in his assessment
letter. He has been a Licensed Clinical Social Worker
for 23 years.

1 (8) WESLEY should have been paying child support on
2 the 10th and 25th of each month since October 2013. Yet,
3 he did not start paying child support until February
4 2014. After WESLEY was served with MARIA's motion, he
5 made extra payments. As of April 28, 2014, MARIA has
6 herself received only the February 2014 payment of
7 \$200.00 and one April payment of \$500.00.

8 On pages 9 through 11 of his opposition and counter-motion
9 WESLEY makes a number of false accusations against MARIA concerning
10 an incident on February 26, 2014. According to WESLEY, these
11 allegations support his claim that it is MARIA who refuses to co-
12 parent. Instead, the truth shows the contrary.

13 On Wednesday, February 26, 2014, ISABELLA was absent
14 again from school. WESLEY did not inform MARIA of that fact.
15 Instead, she learned this via an email from ISABELLA's teacher.
16 MARIA attempted to contact ISABELLA several times without success,
17 and was similarly unable to reach WESLEY on either his home or
18 cellular phones.

19 Later, WESLEY telephoned MARIA stating that his car had
20 broken down and that he could not take ISABELLA to school. He
21 sounded strange and MARIA could hear ISABELLA crying in the
22 background. Therefore, MARIA told WESLEY that she was going to
23 come to his house that afternoon to make sure ISABELLA attended
24 school the next day. He refused, stating that he did not want
25 MARIA coming to his house to check on ISABELLA.

26 When MARIA arrived at WESLEY's home that afternoon,
27 neither WESLEY nor ISABELLA were there. After unsuccessfully
28 attempting to reach WESLEY on his cell phone, MARIA called the
29 police to do a wellness check on ISABELLA. The police arrived, and
30 after a few minutes WESLEY drove by and attempted to avoid them.
31 The officers gave chase and WESLEY was apprehended and escorted

**PLEADING
CONTINUES
IN NEXT
VOLUME**

IN THE SUPREME COURT OF THE STATE OF NEVADA

WESLEY ALLEN LEWIS,
Appellant(s),

vs.

MARIA DANIELA LEWIS A/K/A MARIA
DANIELA PERDOMO,
Respondent(s),

Case No: D427054

Docket No: 66497

RECORD ON APPEAL VOLUME 2

ATTORNEY FOR APPELLANT
WESLEY LEWIS, PROPER PERSON
4650 IDAHO AVE.
LAS VEGAS, NV 89104

ATTORNEY FOR RESPONDENT
FRANCES-ANN FINE, ESQ.
8975 S. PECOS ROAD, STE. 5
HENDERSON, NV 89074

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

I N D E X

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On May 20, 2013 counsel for WESLEY requested an extension of time within which to serve and file his opposition. Counsel for MARIA granted an extension to and including Friday, May 24, 2013. Finally, at 5:59 p.m. on May 28, 2013, WESLEY's counsel emailed a copy of the opposition to MARIA's counsel. Formal service of WESLEY's Response And Countermotion did not take place until May 29, 2013, and it is assumed that the document was filed later that date.

The service and filing of WESLEY's Response And Counter-motion after it was originally due and after the extension granted by counsel has prevented MARIA from timely filing this Reply in compliance with EDCR 2.20. The Court is therefore requested to either treat the Response And Counter-motion as a fugitive document or to consider MARIA's Reply despite its filing date.

II.
SUMMARY OF RELIEF SOUGHT BY THE PARTIES

MARIA's motion seeks to have WESLEY held in contempt in court and punished pursuant to statute for repeated violations of the parties' Decree Of Divorce, primarily consisting of his failure to pay child support as ordered and his failure to cooperate in the obtaining of a passport for the parties' daughter, ISABELLA. The motion further seeks enforcement of the Decree. A judgment for child support arrearages is requested, as is an award of attorney fees.

WESLEY's Response And Countermotion requests that MARIA's motion be denied, that Rule 11 sanctions be imposed, and that he be awarded attorney fees. Finally, he alleges that MARIA has claimed

1 ISABELLA as a dependent on her 2011 and 2012 tax returns and
2 therefore seeks permission to do the same for his 2013 and 2014
3 returns.

4 **III.**
5 **WESLEY IS ADMITTEDLY IN CONTEMPT OF COURT**

6 In responding to MARIA's motion, WESLEY provides this
7 Court with a child support audit performed by the Clark County
8 District Attorney's Office and argues to this Court that the audit
9 is accurate. While there are inaccuracies in that audit, one thing
10 is clear. Despite the fact that this Court ordered WESLEY to pay
11 child support commencing June 2011, there have been many months in
12 which he has paid no child support whatsoever. Indeed the majority
13 of the child support that has been collected took place when
14 WESLEY's tax refund was attached. Each of those months constitutes
15 an individual act of contempt.

16 WESLEY also acknowledges that the Decree (by adopting the
17 parties' Parenting Agreement) provides, in pertinent part, that
18 "the father and child shall obtain passports, so that the child can
19 travel internationally with each parent." WESLEY also acknowledges
20 that he has prevented the obtaining of a passport for ISABELLA.
21 WESLEY's excuses for this are without merit. Therefore, this
22 failure to comply with the Decree Of Divorce constitutes another
23 action that warrants a contempt finding and attendant punishment.

24 **IV.**
25 **ENFORCEMENT OF DECREE**

26 MARIA seeks enforcement of the parties' Decree Of Divorce
27 in as it pertains to WESLEY's child support obligation. When this
28 matter was last before the Court on May 26, 2011, it refused to be
swayed by WESLEY's last minute attempt to avoid his child support

1 obligation. The Court imposed a child support obligation based
2 upon his Financial Disclosure Form filed just the previous day
3 rather than his story that in the last 24 hours he had obtained a
4 new job that paid \$1,200.00 less per month.

5 Recognizing that this Court would not fall for his
6 schemes and misrepresentations, WESLEY instead tried the DA's
7 Office and child support court to see if he could fool them. As a
8 result, a father who has continuously refused to pay his child
9 support obligation had it reduced to nothing other than a
10 meaningless \$30.00 per month payment on arrears.

11 On May 29, 2013 WESLEY's Financial Disclosure Form was
12 filed with this Court and served upon MARIA's counsel. To the DA's
13 Office WESLEY represented that his average gross monthly income is
14 \$1,353.58 (See Master's Recommendations in Case No. R11161532R from
15 February 5, 2013 hearing, page 3). In his Financial Disclosure
16 Form filed with this Court on May 29, 2013, WESLEY represents on
17 page 2 that his gross monthly income is \$1,684.00. The pay stubs
18 attached to WESLEY's Financial Disclosure Form reveal that this
19 year his earnings level has been at a rate of \$1,748.18 per month.

20 WESLEY urges this Court to simply adopt the current child
21 support recommended by the Hearing Master in child support court.
22 In other words, WESLEY wants no child support obligation
23 whatsoever. Yet, his documentation filed with this Court reveals
24 an average gross monthly income that is nearly \$400.00 more than
25 the Hearing Master believed to be the case. Thus, an adoption of
26 the Hearing Master's recommendation is not appropriate.

27 Aside from the difference between WESLEY's documented
28 income based upon his recent filing with this Court and the amount

1 found by the Hearing Master that warrants the imposition of a child
2 support obligation, the facts and the law require the child support
3 imposed by this Court in the Decree to be reinstated. Whatever
4 WESLEY is currently earning, he has a track record of being able to
5 earn substantially more. The fact that he can live with his
6 parents has enabled him to apparently move to a lower paying job in
7 order to lessen (or with the DA eliminate) his child support.
8 WESLEY's current child support obligation should be based upon his
9 earning capacity. It can also be argued that the monies saved on
10 WESLEY not having to pay rent, should be considered income to him
11 and included in a child support award.

12 MARIA also seeks the enforcement of the Decree provision
13 that the parties' daughter, ISABELLA, have a passport so that she
14 can travel internationally with each parent. WESLEY's excuses for
15 why he has refused to permit the obtaining of such a passport are
16 completely without merit. MARIA has not threatened to abscond with
17 ISABELLA to Venezuela. Indeed, WESLEY's own Response And
18 Countermotion notes on page 4 that "Maria has family members that
19 reside in California, including her mother." Does WESLEY really
20 believe that MARIA would flee to Venezuela and therefore keep
21 ISABELLA from her maternal grandmother?

22 WESLEY has engaged in scare tactics as a way of
23 justifying his actions. MARIA's father was press director for the
24 Democratic Party from 1979 to 1988. After his political career
25 ended in 1988 he was self-employed. MARIA's father died in 2008 of
26 Leukemia here in Las Vegas, living half the time with MARIA's
27 brother and half the time with MARIA and WESLEY. Neither MARIA nor
28 her family have any association with any political party in

1 Venezuela. The Decree should be enforced by an order requiring
2 WESLEY to immediately cooperate in the obtaining of a passport for
3 ISABELLA.

4 **V.**

5 **A JUDGMENT FOR ACTUAL CHILD SUPPORT ARREARS SHOULD BE**
6 **ENTERED FOLLOWING A NEW AUDIT**

7 MARIA has filed with this Court her Schedule Of
8 Arrearages and has requested a judgment against WESLEY for the
9 total amount reflected therein. WESLEY, on the other hand,
10 suggests to this Court that the issue of child support arrears has
11 already been settled in child support court. He attaches a copy of
12 the audit performed by the DA's Office, and of course WESLEY is
13 happy with both the amount of arrears found and the obligation to
14 pay merely \$30.00 per month on said arrears.

15 The audit previously performed by the DA's Office is not
16 accurate and cannot be relied upon in determining the amount of
17 WESLEY's child support arrears. First of all, the audit commences
18 with a child support obligation as of August 2011. This is based
19 upon the fact that the Decree was filed on July 15, 2011. Yet, the
20 Decree expressly imposed the child support obligation upon WESLEY
21 effective **June 2011**. Thus, the first two months of WESLEY's
22 obligation are missed by the audit. The audit also ended with the
23 month of September 2012.

24 More important, the audit previously performed improperly
25 assumes that WESLEY's child support obligation for most of the
26 months was \$307.00. His actual child support obligation was
27 \$440.00 per month. The Decree provided him with a \$133.00 per
28 month offset or credit based upon the alleged fact that WESLEY was
paying \$266.00 per month to maintain health and medical insurance

1 for ISABELLA.

2 As this Court is well aware, what is not said is often
3 more revealing than what is said. MARIA's motion asserts that from
4 June 2011 forward WESLEY has not maintained the aforementioned
5 insurance for ISABELLA. Indeed, the motion argues that he should
6 be held in contempt for failing to maintain that insurance.
7 WESLEY'S RESPONSE DOES NOT ONCE ASSERT THAT HE MAINTAINED HEALTH
8 INSURANCE FOR ISABELLA FOR ANY PERIOD OF TIME FROM JUNE 2011
9 FORWARD. In fact, it defends against the contempt argument by
10 noting that the Decree imposed the obligation to maintain the
11 insurance only if it was available through his employment.

12 If WESLEY's child support arrearages are to be based upon
13 any monthly amount less than \$440.00, he must provide proof of the
14 period when he maintained insurance for ISABELLA and the monthly
15 cost of her insurance. Otherwise, the full \$440.00 per month child
16 support obligation must be utilized in calculating WESLEY's
17 arrearages.

18 Based upon the foregoing, it is submitted that an order
19 should be entered requiring the DA's Office to perform a new child
20 support audit. That audit should cover the period from June 2011
21 forward. It should also utilize a monthly child support obligation
22 of \$440.00, not \$307.00. Once that audit is conducted and
23 presented to the Court, a new judgment for arrearages should be
24 entered. In the interim, a reasonable arrearage payment per month
25 (not \$30.00) should be ordered.

26 / / /

27 / / /

28 / / /

1 VI.
2 CLAIMING ISABELLA FOR TAX PURPOSES

3 WESLEY complains that MARIA has claimed ISABELLA as a
4 dependant on both her 2011 and 2012 tax returns, despite the fact
5 that the Decree affords her that right only in odd numbered years.
6 While this assertion is correct, there are many more relevant
7 facts.

8 When MARIA tried to claim ISABELLA on her 2011 tax return
9 she was told that WESLEY had already claimed her as well. MARIA
10 was justifiably outraged because WESLEY was not paying any child
11 support nor financially assisting with ISABELLA's expenses. MARIA
12 was paying for ISABELLA's private kindergarten as well as her day
13 care after school. MARIA contacted the IRS and explained to it the
14 fact that both parties had claimed ISABELLA. MARIA was advised to
15 send the IRS a letter explaining the circumstances and to include
16 all of her receipts for ISABELLA's expenses. In the end, MARIA was
17 able to claim ISABELLA for 2011.

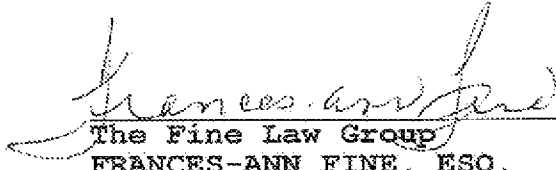
18 As for 2012, MARIA was not sure if she could claim
19 ISABELLA again since WESLEY was still behind on child support.
20 Therefore, she contacted the Child Support Services Customer
21 Representative who advised that since WESLEY's tax refund would get
22 confiscated again it was suggested that she claim ISABELLA again.
23 MARIA needed the money for ISABELLA's tutoring and extracurricular
24 activities since WESLEY was still not providing support.

25 VII.
26 WESLEY'S REQUEST FOR RULE 11 SANCTIONS AND
27 THE PARTIES' RESPECTIVE ATTORNEY FEE REQUESTS

28 As noted above, WESLEY has requested that the Court
impose NRCF Rule 11 sanctions based upon the assertion that MARIA's

1 motion is "frivolous and is based upon anger rather than facts".
2 Both parties have requested a separate award of attorney fees. It
3 is respectfully submitted that WESLEY's request for
4 sanctions/attorney fees is itself wholly without merit. It is
5 WESLEY who has violated this Court's orders contained in the Decree
6 and who has accumulated in a short period of time substantial child
7 support arrearages. WESLEY's requests should be summarily denied.
8 Based upon the authority presented in MARIA's motion, her request
9 for attorney's fees should be granted.

10 DATED this 30 day of MAY, 2013.

11
12 
13 The Fine Law Group
14 FRANCES-ANN FINE, ESQ.
15 Nevada Bar No. 0025
16 Attorney for Plaintiff
17 MARIA DANIELA LEWIS nka
18 MARIA DANIELA PERDOMO

16 AFFIDAVIT OF MARIA DANIELA PERDOMO

17 STATE OF NEVADA)
18) ss.
19 COUNTY OF CLARK)

20 MARIA DANIELA PERDOMO, being first duly sworn, does
21 depose and state as follows:

22 1. I am the Plaintiff in the above-captioned matter,
23 and make this affidavit based upon my own personal knowledge except
24 as to those matters stated upon information and belief, and as to
25 those matters I believe them to be true.


26 / / /

27 / / /

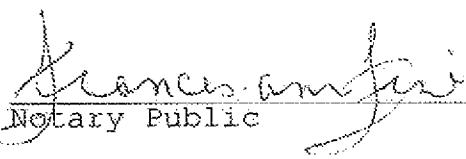
28 / / /

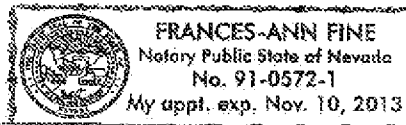
1 2. I have the contents of this reply to which this
2 affidavit is attached, and attest that the facts stated therein are
3 true and correct.

4 Further Affiant sayeth naught.

5
6 
7 MARIA DANIELA LEWIS nka
 MARIA DANIELA PERDOMO

8 SUBSCRIBED AND SWORN to before
9 me this 31 day of May, 2013

10 
11 Notary Public

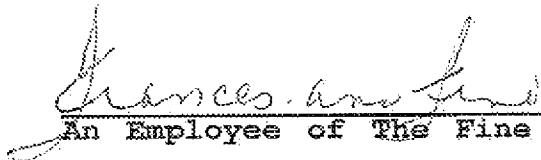


12 CERTIFICATE OF SERVICE

13 I HEREBY CERTIFY that on the 31st day of May, 2013,
14 service of the foregoing Plaintiff's Reply To Defendant's Response
15 And Countermotion For Attorney's Fees And Related Relief was made
16 by placing a copy of same into the United States Mail, first class
17 postage prepaid, at Henderson, Nevada, addressed to:

18 Patricia A. Marr, Esq.
19 4305 Dean Martin Dr., Ste. 185
20 Las Vegas, Nevada 89103

21 and via email: Lvlaw03@yahoo.com

22
23 
24 An Employee of The Fine Law Group
25
26
27
28

Fran Fine

From: Fran Fine
Sent: Friday, May 31, 2013 8:42 AM
To: Mlaw03@yahoo.com
Cc: Earl; Reception; Tamara; perdomo.reply@trustifi.com
Subject: Plaintiff's Reply to Defendant's Response, et al.
Attachments: Reply to Def's Resp and CM 5-31-13.pdf

Tracking:	Recipient	Read
	Mlaw03@yahoo.com	
	Earl	Read: 5/31/2013 8:43 AM
	Reception	
	Tamara	
	perdomo.reply@trustifi.com	
	'Maria Daniela Perdomo'	

Ms. Marr:

Attached is the Plaintiff's Reply To Defendant's Response and Counter-motion for Attorney's Fees and Related Relief.

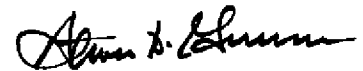
Fran Fine

Frances- Ann Fine, Esquire
The Fine Law Group
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
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IRS CIRCULAR 230 DISCLOSURE: As required by U.S. Treasury Regulations governing tax practice, you are hereby advised that any written tax advice contained herein was not written or intended to be used (and cannot be used) by any taxpayer for the purpose of avoiding penalties that may be imposed under the U.S. Internal Revenue Code.

☐ Please consider the environment before printing this e-mail



CLERK OF THE COURT

1 COM
2 THE FINE LAW GROUP
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

CASE NO. D-10-427054-D

DEPT. NO. T

DATE OF HEARING: 06/04/2013


TIME OF HEARING: 9:30 a.m.

SUPPLEMENTAL CERTIFICATE OF SERVICE

I hereby certify that on 30th day of May, 2013, service
of the PLAINTIFF'S GENERAL FINANCIAL DISCLOSURE FORM filed on May
8, 2013 was made by placing a copy of same into the United States
Mail, first class postage prepaid, at Las Vegas, Nevada, addressed
to:

Patricia A. Marr, Esq.
4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103

and via email to: lvlaw03@yahoo.com


An Employee of The Fine Law Group

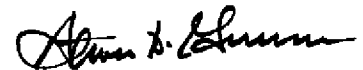
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From: Administrator
Sent: Thursday, May 30, 2013 9:57 AM
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CLERK OF THE COURT

**DISTRICT COURT
CLARK COUNTY, NEVADA**

MARIA DANIELA LEWIS, PLAINTIFF.
VS.
WESLEY ALLEN LEWIS, DEFENDANT.

CASE NO: D-10-427054-D
DEPARTMENT T

ORDER SETTING EVIDENTIARY HEARING

**PRE-HEARING BRIEF DUE: August 22, 2013
HEARING DATE: August 29, 2013**

IT IS HEREBY ORDERED that the above-entitled case is set for an Evidentiary Hearing in Department T on **August 29, 2013, at the hour of 1:30 PM** for a period of **one half (1/2) day** at the Family Courts & Services Center, 601 N. Pecos Road, Las Vegas, Nevada, 89101 in courtroom #14. If this matter settles, please advise the Court as soon as possible.

IT IS FURTHER ORDERED that a Pre-Hearing Brief be filed on or before **August 22, 2013**. A copy of same is to be hand-delivered to Judge's chambers and served upon opposing counsel or party the same day. The Pre-Hearing Brief shall set forth the issues in a clear and concise manner, the relief requested, along with any relevant case law or statutes in point and authorities format. Failure of an attorney or party to comply with this paragraph may result in a judgment of dismissal, other appropriate judgment, default and/or sanctions being imposed pursuant to EDCR 5.87(c).

IT IS FURTHER ORDERED that all discovery shall be completed no later than August 14, 2013. Witness Lists shall be exchanged by June 14, 2013. Any and all Tabbed Exhibits must be delivered to chambers no later than one week prior to Evidentiary Hearing.

IT IS FURTHER ORDERED that no continuances will be granted to either party unless written application is made to the Court, served upon opposing counsel, and a hearing held at least three (3) days prior to the Evidentiary Hearing.

DATED: This 7th day of June, 2013.

Mayle Nathan

GAYLE NATHAN
District Court Judge
Department T

CERTIFICATE OF MAILING

I hereby certify that I caused on the above file stamped date, a copy of the attached **Order Setting Evidentiary Hearing** to be mailed postage prepaid to the following person or persons at their last known address:

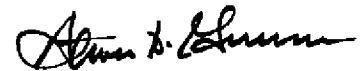
Frances-Ann Fine, Esq.
8975 S. Pecos Rd. #5
Henderson, NV. 89074

Patricia Marr, Esq.
4305 Dean Martin Dr., Suite 185
Las Vegas, NV. 89103

By:

Walter P.

Caryne Pierce
Judicial Executive Assistant
Department T



CLERK OF THE COURT

ORD
The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
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Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

)
)
) CASE NO. 0-10-427054-0
) ~~0-10-427043-D~~
) DEPT NO. T
)
) DATE OF HEARING: 6/4/2013
) TIME OF HEARING: 9:30 a.m.
)
)
)
)

ORDER REGARDING ISSUANCE OF PASSPORT

THIS matter having come before the Court on the 4th day of June, 2013 on Plaintiff's Motion to have Defendant Held in Contempt of Court, To Enforce Decree of Divorce, To Reduce Child Support Arrears to Judgment, and For Award Of Attorney Fees and Defendant's Countermotion For Attorney's Fees and Related Relief. The Plaintiff, MARIA PERDOMO, appeared personally and through her counsel, FRANCES-ANN FINE, ESQUIRE of The Fine Law Group, and Defendant, WESLEY LEWIS, appeared personally and through his counsel, PATRICIA MARR, ESQUIRE; the Court having reviewed all papers and pleadings on file herein and having considered the arguments presented and good cause appearing,

IT IS HEREBY ORDERED that the Defendant is hereby ordered to participate with the Plaintiff in obtaining a valid Passport for

RECEIVED
JUN 10 2013
FAMILY COURT
DEPARTMENT 1

1 the Minor child, herein, to wit: ISABELLA SARA LEWIS, born on the
2 10th day of August, 2006, as ordered in the Decree of Divorce,
3 Parenting Agreement, filed with this Court previously on the 15th
4 day of July, 2011.

5 **IT IS FURTHER ORDERED** that if the Defendant refuses to
6 participate with the Plaintiff in obtaining a valid Passport for
7 the Minor Child as ordered in the Decree of Divorce, on July 15,
8 2011 and again ordered on the date and time above, stated then the
9 Clerk of this Court, Steven Grierson, is hereby authorized to sign
10 in the place and stead of the Defendant, herein.

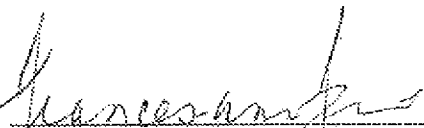
11 **IT IS FURTHER ORDERED** that when and if travel outside of
12 the United States is planned, the countries to be visited must be
13 ~~signatories to~~ ^{Abduction} members of the Hague Convention Treaty.

14 DATED this 11th day of June, 2013..

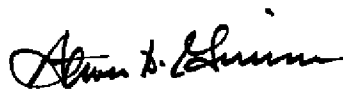
15
16
17 DISTRICT COURT JUDGE
GAYLE NATHAN

18 SUBMITTED BY:

19 APPROVED AS TO FORM AND CONTENT:

20
21 
22 The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
23 Nevada Bar No. 0025
8975 South Pecos Road
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24 Facsimile: 702-384-6900
fran@thefinelawgroup.com
25 Attorneys for Plaintiff
MARIA DANIELA PERDOMO fka
26 MARIA DANIELA LEWIS

27
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PATRICIA A. MARR, LTD
PATRICIA A. MARR, ESQUIRE
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Telephone: 702-353-4225
Facsimile: 702-737-1776
Lvlaw03@yahoo.com
Attorney for Defendant
Wesley Allen Lewis



CLERK OF THE COURT

1 LIST
2 The Fine Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 Suite 5
6 8975 South Pecos Road
7 Henderson, Nevada 89074
8 Telephone: 702/384-8900
9 Facsimile: 702/384-6900
10 fran@thefinelawgroup.com
11 Attorney for Plaintiff
12 MARIA DANIELA LEWIS nka
13 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS nka)	
11 MARIA DANIELA PERDOMO,)	CASE NO: D-10-427054-D
12 Plaintiff)	DEPT NO: T
13 vs.)	
14 WESLEY ALLEN LEWIS,)	DATE OF HEARING: 8-29-13
15 Defendant)	TIME OF HEARING: 1:30 p.m.

16 Plaintiff's Initial Evidentiary Hearing Witness List

17 COMES NOW Plaintiff, MARIA DANIELA PERDOMO, by and
18 through her attorney, FRANCES-ANN FINE, ESQ., of The Fine Law
19 Group, in compliance with the Court's Order Setting Evidentiary
20 Hearing filed June 7, 2013, and submits the following initial list
21 of witnesses that Plaintiff may call to testify at the evidentiary
22 hearing to be conducted on August 29, 2013:

- 23 1. Plaintiff, as to all issues.
24 2. Defendant, as to all issues.

25 This initial list of witnesses shall be supplemented as


26 / / /

27 / / /

28 / / /

identities of additional potential witnesses become known through investigation and discovery.

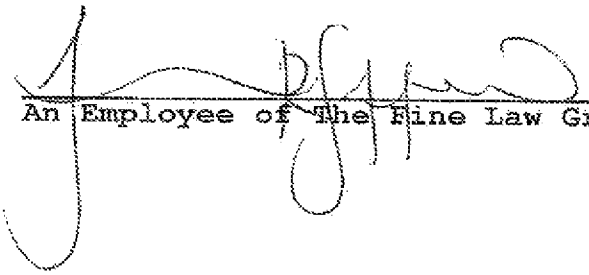
DATED this 14th day of June, 2013.

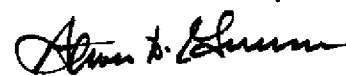

The Fine Law Group
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
Attorney for Plaintiff
MARIA DANIELA PERDOMO

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of June, 2013, service of the foregoing Plaintiff's Initial Evidentiary Hearing Witness List was made by placing a copy of same into the United State Mail, first class postage prepaid, at Henderson, Nevada, addressed to:

Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Drive, Ste. 185
Las Vegas, Nevada 89103


An Employee of The Fine Law Group



CLERK OF THE COURT

NEOJ
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)
MARIA DANIELA PERDOMO,)
Plaintiff,) CASE NO. D-10-427054-D
vs.) DEPT. NO. T
WESLEY ALLEN LEWIS,)
Defendant.)
DATE OF HEARING: 06/04/2013
TIME OF HEARING: 9:30 a.m.

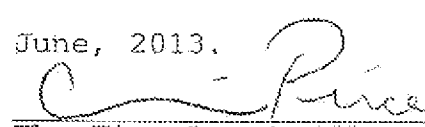
NOTICE OF ENTRY OF ORDER REGARDING ISSUANCE OF PASSPORT

TO: WESLEY ALLEN LEWIS, Defendant; and

TO: PATRICIA A. MARR, ESQUIRE, Attorney for Defendant;

YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an
ORDER REGARDING ISSUANCE OF PASSPORT, a copy of which is attached
hereto, was entered and filed in the above-entitled matter on the
13th day of June, 2013.

DATED the 11th day of June, 2013.



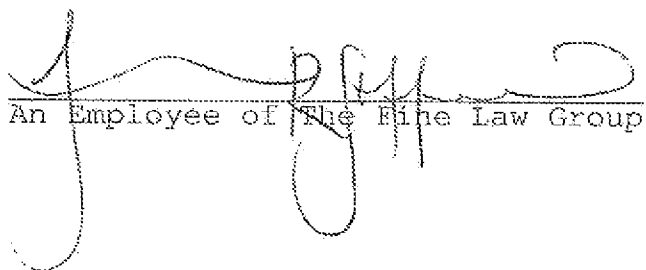
The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 S. Pecos Road, Ste. 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

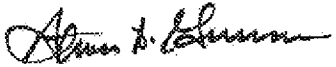
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CERTIFICATE OF MAILING

I hereby certify that on this 17th day of June, 2013, a copy of the foregoing NOTICE OF ENTRY OF ORDER REGARDING ISSUANCE OF PASSPORT was placed into the United States Mail, first class postage prepaid at Las Vegas, Nevada, addressed to:

Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Dr., Ste. #185
Las Vegas, Nevada 89103


An Employee of The Fine Law Group


CLERK OF THE COURT

1 ORD
2 The Fine Law Group
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka
10 MARIA DANIELA PERDOMO,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

)
)
) CASE NO. D-10-427043-D
) DEPT NO. T

)
) DATE OF HEARING: 6/4/2013
) TIME OF HEARING: 9:30 a.m.

ORDER REGARDING ISSUANCE OF PASSPORT

16 THIS matter having come before the Court on the 4th day
17 of June, 2013 on Plaintiff's Motion to have Defendant Held in
18 Contempt of Court, To Enforce Decree of Divorce, To Reduce Child
19 Support Arrears to Judgment, and For Award Of Attorney Fees and
20 Defendant's Countermotion For Attorney's Fees and Related Relief.
21 The Plaintiff, MARIA PERDOMO, appeared personally and through her
22 counsel, FRANCES-ANN FINE, ESQUIRE of The Fine Law Group, and
23 Defendant, WESLEY LEWIS, appeared personally and through his
24 counsel, PATRICIA MARR, ESQUIRE; the Court having reviewed all
25 papers and pleadings on file herein and having considered the
26 arguments presented and good cause appearing,

27 IT IS HEREBY ORDERED that the Defendant is hereby ordered
28 to participate with the Plaintiff in obtaining a valid Passport for

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JUN 10 2013

FAMILY COURT
DEPARTMENT 1

1 the Minor child, herein, to wit: ISABELLA SARA LEWIS, born on the
2 10th day of August, 2006, as ordered in the Decree of Divorce,
3 Parenting Agreement, filed with this Court previously on the 15th
4 day of July, 2011.

5 **IT IS FURTHER ORDERED** that if the Defendant refuses to
6 participate with the Plaintiff in obtaining a valid Passport for
7 the Minor Child as ordered in the Decree of Divorce, on July 15,
8 2011 and again ordered on the date and time above, stated then the
9 Clerk of this Court, Steven Grierson, is hereby authorized to sign
10 in the place and stead of the Defendant, herein.

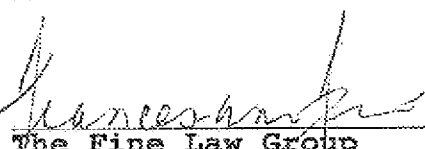
11 **IT IS FURTHER ORDERED** that when and if travel outside of
12 the United States is planned, the countries to be visited must be
13 ~~signatories to~~ ^{Abduction} members of the Hague Convention Treaty.

14 DATED this 11 day of June, 2013..

15
16 
17 DISTRICT COURT JUDGE
18 GAYLE NATHAN

19 SUBMITTED BY:

20 APPROVED AS TO FORM AND CONTENT:

21 
22 The Fine Law Group
23 FRANCES-ANN FINE, ESQUIRE
24 Nevada Bar No. 0025
25 8975 South Pecos Road
26 Henderson, NV 89074
Telephone: 702-384-8900
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Attorneys for Plaintiff
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MARIA DANIELA LEWIS

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Lvlaw03@yahoo.com
Attorney for Defendant
Wesley Alllen Lewis

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5 fran@thefinelawgroup.com
Attorney for Plaintiff
6 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka
10 MARIA DANIELA PERDOMO,

Plaintiff,

11 vs.

12 WESLEY ALLEN LEWIS,

13 Defendant.
14

)
)
) CASE NO. Q-10-427054-D
~~D-10-427043-D~~

) DEPT NO. T
)

) DATE OF HEARING: 6/4/2013

) TIME OF HEARING: 9:30 a.m.
)

15 ORDER REGARDING ISSUANCE OF PASSPORT

16 THIS matter having come before the Court on the 4th day
17 of June, 2013 on Plaintiff's Motion to have Defendant Held in
18 Contempt of Court, To Enforce Decree of Divorce, To Reduce Child
19 Support Arrears to Judgment, and For Award Of Attorney Fees and
20 Defendant's Countermotion For Attorney's Fees and Related Relief.
21 The Plaintiff, MARIA PERDOMO, appeared personally and through her
22 counsel, FRANCES-ANN FINE, ESQUIRE of The Fine Law Group, and
23 Defendant, WESLEY LEWIS, appeared personally and through his
24 counsel, PATRICIA MARR, ESQUIRE; the Court having reviewed all
25 papers and pleadings on file herein and having considered the
26 arguments presented and good cause appearing,

27 IT IS HEREBY ORDERED that the Defendant is hereby ordered
28 to participate with the Plaintiff in obtaining a valid Passport for

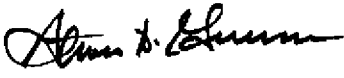
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JUN 10 2013

FAMILY COURT
DEPARTMENT

1 ORD
2 The Fine Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 Suite 5
6 8975 South Pecos Road
7 Henderson, Nevada 89074
8 Telephone: 702/384-8900
9 Facsimile: 702/384-6900
10 corinne@thefinelawgroup.com
11 Attorney for Plaintiff
12 MARIA DANIELA LEWIS nka
13 MARIA DANIELA PERDOMO

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CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO)	
)	
Plaintiff,)	CASE NO: D-10-427054-D
)	DEPT NO: T
vs.)	
)	DATE OF HEARING: 8-29-13
WESLEY ALLEN LEWIS,)	TIME OF HEARING: 1:30 p.m.
)	
Defendant.)	

ORDER TO SHOW CAUSE

This matter having come before the Court on Plaintiff's Motion To Have Defendant Held In Contempt Of Court, To Enforce Decree Of Divorce, To Reduce Child Support Arrears To Judgment, And For Award Of Attorney Fees; Plaintiff appearing personally and through her attorney, FRANCES-ANN FINE, ESQ., of The Fine Law Group; Defendant appearing personally and through his attorney, PATRICIA A. MARR, ESQ., of Patricia A. Marr, Ltd.; the Court having reviewed said motion and having considered the arguments of counsel, and good cause appearing,

IT IS HEREBY ORDERED that Defendant come before the Court on the 29th day of August, 2013 at 1:30 p.m. of said day to show

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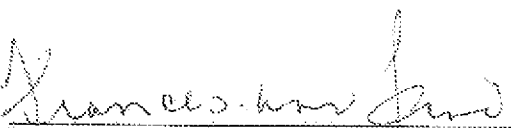
1 cause, if any he has, why he should not be held in contempt of
2 Court and punished accordingly for his failure to comply with the
3 Decree Of Divorce filed July 15, 2011 as to his child support
4 obligation to Plaintiff.

5 DATED this 15th day of July, 2013.

6
7
8 DISTRICT JUDGE

9 GAYLE NATHAN

10 Submitted by:

11
12 
13 The Fine Law Group
14 FRANCES-ANN FINE, ESQ.
15 Nevada Bar No. 0025
16 8975 S Pecos Road, Suite 5
17 Henderson, Nevada 89074
18 Telephone: 702/384-8900
19 Facsimile: 702/384-6900
20 Attorney for Plaintiff
21 MARIA DANIELA LEWIS nka
22 MARIA DANIELA PERDOMO
23
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ORD
The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
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Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

CLARK COUNTY, NEVADA

427054

) DATE OF HEARING: 6/4/2013
) TIME OF HEARING: 9:30 a.m.

2000

THIS matter having come before the Court on June 4, 2013 for hearing on Plaintiff's Motion to have Defendant Held in Contempt of Court, To Enforce Decree of Divorce, To Reduce Child Support Arrears to Judgment, and For Award Of Attorney Fees and Defendant's Countermotion For Attorney's Fees and Related Relief. Plaintiff, MARIA PERDOMO, appearing personally and through her counsel, FRANCES-ANN FINE, ESQ., of The Fine Law Group; Defendant, WESLEY ALLEN LEWIS, appearing personally and through his counsel, PATRICIA A. MARR, ESQ., of Patricia A. Marr, Ltd.; the Court having reviewed all papers and pleadings on file herein and having considered the arguments presented and good cause appearing,

IT IS HEREBY ORDERED that Plaintiff's request for an Order To Show Cause is hereby granted as to Defendant's failure to

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Jul 08 2013

FAMILY COURT
DEPARTMENT T

1 pay the child support ordered in the parties' Decree Of Divorce
2 filed July 15, 2011.

3 **IT IS FURTHER ORDERED** that the child support obligation
4 imposed upon Defendant by the Decree Of Divorce was in the amount
5 of \$440.00 per month unless he maintained health insurance for the
6 parties' minor child and was warranted a credit of one-half of the
7 cost thereof.

8 **IT IS FURTHER ORDERED** that the Court construes
9 Plaintiff's motion as seeking NRCP 60(b) relief as to the child
10 support arrears judgment rendered in Case No. R-11-161532-R, and
11 grants such request, and sets aside said judgment on the basis of
12 that court's mistake as to the amount of Defendant's monthly child
13 support obligation.

14 **IT IS FURTHER ORDERED** that the Family Support Division of
15 the Clark County District Attorney's Office perform a new audit of
16 Defendant's child support obligation utilizing a monthly child
17 support obligation of \$440.00 per month commencing June 2011. Said
18 audit shall be completed prior to August 29, 2013.

19 **IT IS FURTHER ORDERED** that, pursuant to stipulation of
20 the parties, the parties' minor child shall permitted to telephone
21 the parent she is not with at least once per day and that she shall
22 be permitted to keep with her the cell phone to be utilized for
23 those telephone calls.

24 **IT IS FURTHER ORDERED** that the parties' minor child shall
25 have her own bed in each party's household.

26 **IT IS FURTHER ORDERED** that Plaintiff's request for the
27 obtaining of a passport for the parties' minor child is hereby
28 granted, the details of which shall be set forth in a separate

1 order.

2 **IT IS FURTHER ORDERED** that, absent a stipulated agreement
3 between the parties, a failure to comply with the Decree Of Divorce
4 provision regarding the right to claim the parties' minor child as
5 a dependent for tax purposes in a particular year shall be cured by
6 the offending party making appropriate arrangements with the
7 Internal Revenue Service to comply with the Decree.

8 **IT IS FURTHER ORDERED** that an Evidentiary Hearing be
9 conducted on August 29, 2013 commencing at 1:30 p.m. Issues to be
10 considered at that Evidentiary Hearing shall be:

11 (1) the Order To Show Cause why Defendant should not
12 be held in contempt of court for his failure to pay
13 ordered child support;

14 (2) Plaintiff's request for a judgment for child
15 support arrears;

16 (3) The imposition of a monthly payment on child
17 support arrears;

18 (4) A current child support obligation/sharing of
19 minor child's expenses; and

20 (5) A determination as and for attorney's fees.

21 **IT IS FURTHER ORDERED** that Defendant shall bring the
22 minor child's report card to the Evidentiary Hearing.

23 **IT IS FURTHER ORDERED** that the parties may conduct post-
24 divorce discovery.

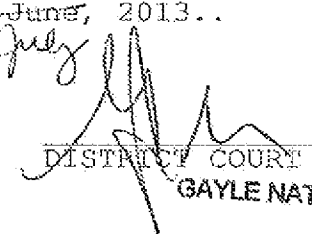
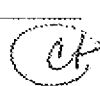
25 **IT IS FURTHER ORDERED** that the parties shall serve and
26 file, with a courtesy copy delivered to Chambers, a Pre-Evidentiary
27 Hearing Brief.

28 / / /

1 IT IS FURTHER ORDERED that discovery shall close fifteen
2 (15) days before the August 29, 2013 Evidentiary Hearing.

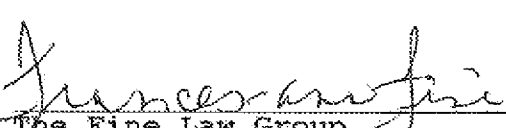
3 IT IS FURTHER ORDERED that the Court shall issue a
4 separate Scheduling Order as to deadlines associated with the
5 Evidentiary Hearing.

6 DATED this 10th day of ~~June~~ ^{July}, 2013..

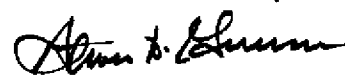
7
8 
9 DISTRICT COURT JUDGE
GAYLE NATHAN 

10 SUBMITTED BY:

11 APPROVED AS TO FORM AND CONTENT:

12 
13 The Fine Law Group
14 FRANCES-ANN FINE, ESQUIRE
15 Nevada Bar No. 0025
8975 South Pecos Road
16 Henderson, NV 89074
Telephone: 702-384-8900
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fran@thefinelawgroup.com
17 Attorneys for Plaintiff
18 MARIA DANIELA PERDOMO fka
MARIA DANIELA LEWIS

PATRICIA A. MARR, LTD
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Telephone: 702-353-4225
Facsimile: 702-737-1776
Lvlaw03@yahoo.com
Attorney for Defendant
WESLEY ALLEN LEWIS



CLERK OF THE COURT

NEOJ
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

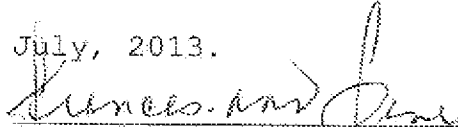
DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)
MARIA DANIELA PERDOMO,)
Plaintiff,) CASE NO. D-10-427054-D
vs.) DEPT. NO. T
WESLEY ALLEN LEWIS,) DATE OF HEARING: 08/29/2013
Defendant.) TIME OF HEARING: 1:30 p.m.

NOTICE OF ENTRY OF ORDER TO SHOW CAUSE

TO: WESLEY ALLEN LEWIS, Defendant; and
TO: PATRICIA A. MARR, ESQUIRE, Attorney for Defendant:
YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an
ORDER TO SHOW CAUSE, a copy of which is attached hereto, was
entered and filed in the above-entitled matter on the 11th day of
July, 2013.

DATED the 16 day of July, 2013.



The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 S. Pecos Road, Ste. 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

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Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Dr., Ste. #185
Las Vegas, Nevada 89103

Page 2 of 2

1 ORD
2 The Fine Law Group
3 FRANCES-ANN FINE, ESQ.
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9 Facsimile: 702/384-8900
10 corinne@thefinelawgroup.com
11 Attorney for Plaintiff
12 MARIA DANIELA LEWIS nka
13 MARIA DANIELA PERDOMO

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CLERK OF THE COURT

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS nka)
11 MARIA DANIELA PERDOMO)

12 Plaintiff,)

CASE NO: D-10-427054-D

DEPT NO: T

13 vs.)

DATE OF HEARING: 8-29-13

14 WESLEY ALLEN LEWIS,)

TIME OF HEARING: 1:30 p.m.

15 Defendant.)

16 ORDER TO SHOW CAUSE

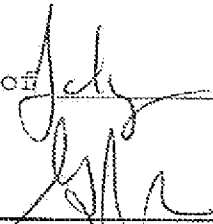
17 This matter having come before the Court on Plaintiff's
18 Motion To Have Defendant Held In Contempt Of Court, To Enforce
19 Decree Of Divorce, To Reduce Child Support Arrears To Judgment, And
20 For Award Of Attorney Fees; Plaintiff appearing personally and
21 through her attorney, FRANCES-ANN FINE, ESQ., of The Fine Law
22 Group; Defendant appearing personally and through his attorney,
23 PATRICIA A. MARR, ESQ., of Patricia A. Marr, Ltd.; the Court having
24 reviewed said motion and having considered the arguments of
25 counsel, and good cause appearing,

26 IT IS HEREBY ORDERED that Defendant come before the Court
27 on the 29th day of August, 2013 at 1:30 p.m. of said day to show
28

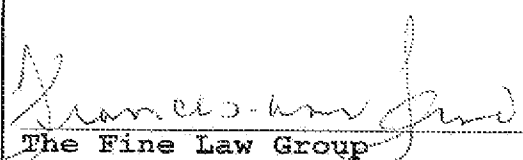
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JUN 20 2013

1 cause, if any he has, why he should not be held in contempt of
2 Court and punished accordingly for his failure to comply with the
3 Decree Of Divorce filed July 15, 2011 as to his child support
4 obligation to Plaintiff.

5 DATED this 15th day of July, 2013.

6
7
8 
DISTRICT JUDGE
9 GAYLE NATHAN

10 Submitted by:

11
12 
13 The Fine Law Group
FRANCES-ANN FINE, ESQ.
14 Nevada Bar No. 0025
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15 Henderson, Nevada 89074
Telephone: 702/384-8900
16 Facsimile: 702/384-6900
Attorney for Plaintiff
17 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO
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1 ORD
The Fine Law Group
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corinne@thefinelawgroup.com
6 Attorney for Plaintiff
MARIA DANIELA LEWIS nka
7 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

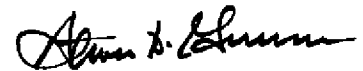
10 MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO)	
)	
Plaintiff,)	CASE NO: D-10-427054-D
)	DEPT NO: T
12 vs.)	
)	
13 WESLEY ALLEN LEWIS,)	DATE OF HEARING: 8-29-13
)	TIME OF HEARING: 1:30 p.m.
14 Defendant.)	
)	
15)	

16 ORDER TO SHOW CAUSE

17 This matter having come before the Court on Plaintiff's
18 Motion To Have Defendant Held In Contempt Of Court, To Enforce
19 Decree Of Divorce, To Reduce Child Support Arrears To Judgment, And
20 For Award Of Attorney Fees; Plaintiff appearing personally and
21 through her attorney, FRANCES-ANN FINE, ESQ., of The Fine Law
22 Group; Defendant appearing personally and through his attorney,
23 PATRICIA A. MARR, ESQ., of Patricia A. Marr, Ltd.; the Court having
24 reviewed said motion and having considered the arguments of
25 counsel, and good cause appearing,

26 IT IS HEREBY ORDERED that Defendant come before the Court
27 on the 29th day of August, 2013 at 1:30 p.m. of said day to show
28

RECEIVED
JUN 20 2013



CLERK OF THE COURT

1 NEOJ
2 THE FINE LAW GROUP
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 Attorney for Plaintiff
10 MARIA DANIELA LEWIS nka
11 MARIA DANIELA PERDOMO

DISTRICT COURT

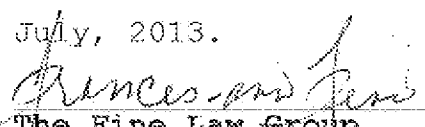
CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka)
10 MARIA DANIELA PERDOMO,)
11 Plaintiff,) CASE NO. D-10-427054-D
12 vs.) DEPT. NO. T
13 WESLEY ALLEN LEWIS,) DATE OF HEARING: 06/04/2013
14 Defendant.) TIME OF HEARING: 9:30 a.m.

NOTICE OF ENTRY OF ORDER

15 TO: WESLEY ALLEN LEWIS, Defendant; and
16 TO: PATRICIA A. MARR, ESQUIRE, Attorney for Defendant;
17 YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an
18 ORDER, a copy of which is attached hereto, was entered and filed in
19 the above-entitled matter on the 15th day of July, 2013.

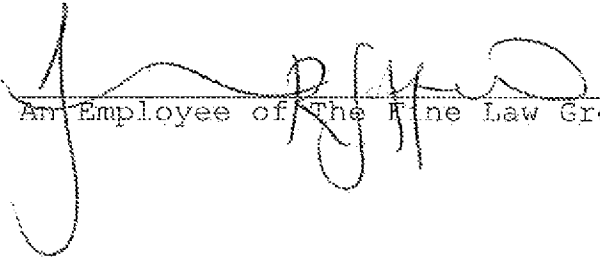
20 DATED the 16th day of July, 2013.

21 
22 The Fine Law Group
23 FRANCES-ANN FINE, ESQUIRE
24 Nevada Bar No. 0025
25 8975 S. Pecos Road, Ste. 5
26 Henderson, Nevada 89074
27 Telephone: 702/384-8900
28 Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

1 CERTIFICATE OF MAILING

2 I hereby certify that on this 19th day of July, 2013, a
3 copy of the foregoing NOTICE OF ENTRY OF ORDER was placed into the
4 United States Mail, first class postage prepaid at Las Vegas,
5 Nevada, addressed to:

6 Patricia A. Marr, Esq.
7 Patricia A. Marr, Ltd.
8 4305 Dean Martin Dr., Ste. #185
9 Las Vegas, Nevada 89103

10
11
12 
13 An Employee of The Fine Law Group
14
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CLERK OF THE COURT

1 ORD
2 The Fine Law Group
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka
10 MARIA DANIELA PERDOMO,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

)
)
) 427054
) CASE NO. D-10-427043-D
) DEPT NO. T
)
)
) DATE OF HEARING: 6/4/2013
) TIME OF HEARING: 9:30 a.m.
)
)
)
)
)

ORDER

16 THIS matter having come before the Court on June 4, 2013
17 for hearing on Plaintiff's Motion to have Defendant Held in
18 Contempt of Court, To Enforce Decree of Divorce, To Reduce Child
19 Support Arrears to Judgment, and For Award Of Attorney Fees and
20 Defendant's Countermotion For Attorney's Fees and Related Relief.
21 Plaintiff, MARIA PERDOMO, appearing personally and through her
22 counsel, FRANCES-ANN FINE, ESQ., of The Fine Law Group; Defendant,
23 WESLEY ALLEN LEWIS, appearing personally and through his counsel,
24 PATRICIA A. MARR, ESQ., of Patricia A. Marr, Ltd.; the Court having
25 reviewed all papers and pleadings on file herein and having
26 considered the arguments presented and good cause appearing,

27 IT IS HEREBY ORDERED that Plaintiff's request for an
Order To Show Cause is hereby granted as to Defendant's failure to

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FAMILY COURT
DEPARTMENT T

1 pay the child support ordered in the parties' Decree Of Divorce
2 filed July 15, 2011.

3 **IT IS FURTHER ORDERED** that the child support obligation
4 imposed upon Defendant by the Decree Of Divorce was in the amount
5 of \$440.00 per month unless he maintained health insurance for the
6 parties' minor child and was warranted a credit of one-half of the
7 cost thereof.

8 **IT IS FURTHER ORDERED** that the Court construes
9 Plaintiff's motion as seeking NRCP 60(b) relief as to the child
10 support arrears judgment rendered in Case No. R-11-161532-R, and
11 grants such request, and sets aside said judgment on the basis of
12 that court's mistake as to the amount of Defendant's monthly child
13 support obligation.

14 **IT IS FURTHER ORDERED** that the Family Support Division of
15 the Clark County District Attorney's Office perform a new audit of
16 Defendant's child support obligation utilizing a monthly child
17 support obligation of \$440.00 per month commencing June 2011. Said
18 audit shall be completed prior to August 29, 2013.

19 **IT IS FURTHER ORDERED** that, pursuant to stipulation of
20 the parties, the parties' minor child shall be permitted to telephone
21 the parent she is not with at least once per day and that she shall
22 be permitted to keep with her the cell phone to be utilized for
23 those telephone calls.

24 **IT IS FURTHER ORDERED** that the parties' minor child shall
25 have her own bed in each party's household.

26 **IT IS FURTHER ORDERED** that Plaintiff's request for the
27 obtaining of a passport for the parties' minor child is hereby
28 granted, the details of which shall be set forth in a separate

1 order.

2 **IT IS FURTHER ORDERED** that, absent a stipulated agreement
3 between the parties, a failure to comply with the Decree Of Divorce
4 provision regarding the right to claim the parties' minor child as
5 a dependent for tax purposes in a particular year shall be cured by
6 the offending party making appropriate arrangements with the
7 Internal Revenue Service to comply with the Decree.

8 **IT IS FURTHER ORDERED** that an Evidentiary Hearing be
9 conducted on August 29, 2013 commencing at 1:30 p.m. Issues to be
10 considered at that Evidentiary Hearing shall be:

11 (1) the Order To Show Cause why Defendant should not
12 be held in contempt of court for his failure to pay
13 ordered child support;

14 (2) Plaintiff's request for a judgment for child
15 support arrears;

16 (3) The imposition of a monthly payment on child
17 support arrears;

18 (4) A current child support obligation/sharing of
19 minor child's expenses; and

20 (5) A determination as and for attorney's fees.

21 **IT IS FURTHER ORDERED** that Defendant shall bring the
22 minor child's report card to the Evidentiary Hearing.

23 **IT IS FURTHER ORDERED** that the parties may conduct post-
24 divorce discovery.

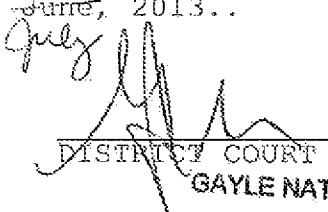

25 **IT IS FURTHER ORDERED** that the parties shall serve and
26 file, with a courtesy copy delivered to Chambers, a Pre-Evidentiary
27 Hearing Brief.

28 / / /

1 IT IS FURTHER ORDERED that discovery shall close fifteen
2 (15) days before the August 29, 2013 Evidentiary Hearing.

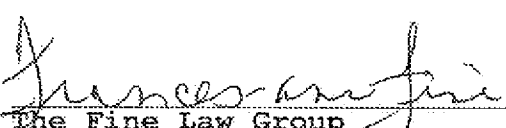
3 IT IS FURTHER ORDERED that the Court shall issue a
4 separate Scheduling Order as to deadlines associated with the
5 Evidentiary Hearing.

6 DATED this 10th day of ~~June~~ ^{July}, 2013..

7
8 
9 DISTRICT COURT JUDGE
GAYLE NATHAN 

10 SUBMITTED BY:

11 APPROVED AS TO FORM AND CONTENT:

12 
13 The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
14 Nevada Bar No. 0025
8975 South Pecos Road
15 Henderson, NV 89074
Telephone: 702-384-8900
16 Facsimile: 702-384-6900
fran@thefinelawgroup.com
17 Attorneys for Plaintiff
18 MARIA DANIELA PERDOMO fka
MARIA DANIELA LEWIS

PATRICIA A. MARR, LTD
PATRICIA A. MARR, ESQUIRE
Nevada Bar NO. 8846
4305 Dean Martin Dr., Suite 184
Las Vegas, NV 89103
Telephone: 702-353-4225
Facsimile: 702-737-1776
Lvlaw03@yahoo.com
Attorney for Defendant
WESLEY ALLEN LEWIS

1 ORD
The Fine Law Group
2 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
3 8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
4 Telephone: 702/384-8900
Facsimile: 702/384-6900
5 fran@thefinelawgroup.com
Attorney for Plaintiff
6 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka)
MARIA DANIELA PERDOMO,) **427054**
10 Plaintiff,) CASE NO. D-10-427043-D
11 vs.) DEPT NO. T
12) DATE OF HEARING: 6/4/2013
WESLEY ALLEN LEWIS,) TIME OF HEARING: 9:30 a.m.
13 Defendant.)
14)

15 ORDER

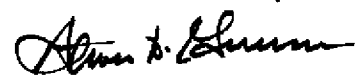
16 THIS matter having come before the Court on June 4, 2013
17 for hearing on Plaintiff's Motion to have Defendant Held in
18 Contempt of Court, To Enforce Decree of Divorce, To Reduce Child
19 Support Arrears to Judgment, and For Award Of Attorney Fees and
20 Defendant's Countermotion For Attorney's Fees and Related Relief.
21 Plaintiff, MARIA PERDOMO, appearing personally and through her
22 counsel, FRANCES-ANN FINE, ESQ., of The Fine Law Group; Defendant,
23 WESLEY ALLEN LEWIS, appearing personally and through his counsel,
24 PATRICIA A. MARR, ESQ., of Patricia A. Marr, Ltd.; the Court having
25 reviewed all papers and pleadings on file herein and having
26 considered the arguments presented and good cause appearing,

27 IT IS HEREBY ORDERED that Plaintiff's request for an
Order To Show Cause is hereby granted as to Defendant's failure to

✓
RECEIVED

JUL 08 2013

FAMILY COURT
DEPARTMENT T



CLERK OF THE COURT

1 PSER
The Fine Law Group
2 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
3 8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
4 Telephone: 702/384-8900
Facsimile: 702/384-6900
5 fran@thefinelawgroup.com
Attorney for Plaintiff
6 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

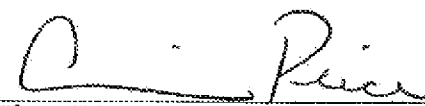
CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
10 Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT. NO. T
11 vs.)	
)	DATE OF HEARING: 8/29/2013
12 WESLEY ALLEN LEWIS,)	TIME OF HEARING: 1:30 p.m.
)	
13 Defendant.)	
14)	

15 PROOF OF SERVICE

16 COMES NOW Plaintiff, MARIA PERDOMO, by and through her
17 attorney, FRANCES-ANN FINE, ESQUIRE of The Fine Law Group, and
18 submits to the Court the attached Affidavit Of Service evidencing
19 personal service of the Order to Show Cause, upon Defendant, WESLEY
20 ALLEN PERDOMO, on July 18, 2013.

21 DATED this 24th day of July, 2013.

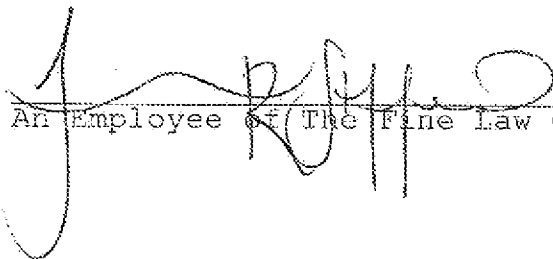
22 
23 _____
24 The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
25 Nevada Bar No. 0025
Suite 5
26 8975 South Pecos Road
Henderson, Nevada 89074
27 Telephone: 702/384-8900
Facsimile: 702/384-6900
28 Attorney for Plaintiff
MARIA PERDOMO

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CERTIFICATE OF MAILING

I hereby certify that on this 24th day of July, 2013, a copy of the foregoing PROOF OF SERVICE was place into the United States Mail, first class postage prepaid at Henderson, Nevada, addressed to the following:

Patricia Marr, Esquire
4305 Dean Martin Drive
Suite 185
Las Vegas, Nevada 89103


An Employee of The Fine Law Group

1 STATE OF NEVADA)

2 COUNTY OF CLARK)

)ss:

AFFIDAVIT OF SERVICE

3 Deborah Metz (#R-059360), a citizen of the United States, over 18 years of age, not a party to, nor
4 interested in the proceeding in which this affidavit is made. That affiant received a copy of the Order to Show
5 Cause, on the 16th day of July, 2013 and served the same on the 18th day of July, 2013 at 8:00am by:

6 (Affiant must complete the appropriate paragraph)

7 1. Delivering and leaving a copy with the Defendant Wesley Allen Lewis, at (state address) _____
8 4650 Idaho Ave. Las Vegas, Nevada

9 2. Serving the Defendant _____, by personally delivering and leaving a copy with _____
10 _____, a person of suitable age and discretion residing at the Defendant's usual place of abode
11 located at: (state address): _____

12 3. Serving the Defendant _____, by personally delivering and leaving a copy at (state
13 address) _____

14 (a) With _____ as _____, an agent lawfully designated by statute to accept service of
process;

15 (b) With _____, pursuant to NRS 14.020 as a person of suitable age and discretion
16 at the above address, which address is the address of the resident agent as shown on the current certificate of
designation filed with the Secretary of State.

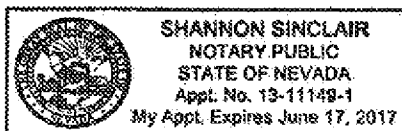
17 I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and
18 correct.

19 EXECUTED this 19th day of July, 2013

20 _____
21 Signature of person making service
22 Corporate Intelligence International
707 South 10th Street
Las Vegas, Nevada 89101
State License #595-595A

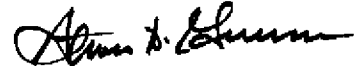
23 SUBSCRIBED AND SWORN to before me this
24 19th day of July, 2013

25 Shannon Sinclair
26 NOTARY PUBLIC in and for said County and State
My Commission expires: _____
27 (SEAL)



1 ACC
The Fine Law Group
2 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
3 8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
4 Telephone: 702/384-8900
Facsimile: 702/384-6900
5 fran@thefinelawgroup.com
Attorney for Plaintiff
6 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

Electronically Filed
07/24/2013 03:32:05 PM



CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

)
)
) CASE NO. D-10-427054-D
) DEPT. NO. T
)
) DATE OF HEARING: 08/29/2013
) TIME OF HEARING: 1:30 p.m.
)
)
)

ACCEPTANCE OF SERVICE

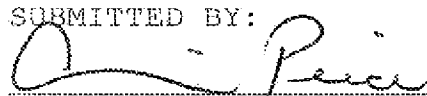
16 On this 24th day of July, 2013, Defendant, WESLEY ALLEN
17 LEWIS by and through his undersigned attorney, PATRICIA MARR,
18 ESQUIRE, accepted Service of Plaintiff's Order to Show Cause.

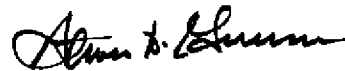
19 This Service will have the same force and effect as if it
20 were served in person on the Defendant.

21 DATED this 24th day of July, 2013.

22
23 Patricia Marr, Esquire
Patricia Marr, Ltd.
4305 Dean Martin Drive, Suite 185
Las Vegas, Nevada 89103

25 SUBMITTED BY:

26 
27 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025



CLERK OF THE COURT

MOT
The Fine Law Group
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Email: fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO: D-10-427054-D
Plaintiff)	DEPT NO: T / <i>Discovery</i>
vs.)	
)	DATE OF HEARING: 9/6/2013
WESLEY ALLEN LEWIS,)	TIME OF HEARING: 1:30 PM
)	
Defendant.)	

Motion To Compel Discovery Responses
And For Award Of Attorney's Fees

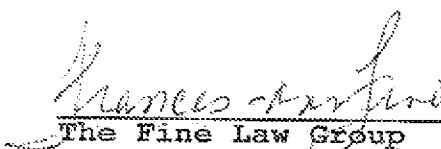
and
Ex Parte Application For An Order Shortening Time

COMES NOW Plaintiff, MARIA DANIELA PERDOMO, by and through her attorney, FRANCES-ANN FINE, ESQ., of The Fine Law Group, and moves this Court for an order compelling Plaintiff to respond fully and completely to Plaintiff's First Request For Production of Documents and Plaintiff's First Set Of Interrogatories served upon Defendant via mail on June 12, 2013 and for an award of attorney fees. Plaintiff further requests that this motion be heard on an order shortening time.

This motion is made and based upon all papers and pleadings on file herein, Points And Authorities submitted herewith, exhibits attached hereto, the Declaration of counsel in

1 support of the application for an order shortening time, and such
2 further argument as may be adduced at the hearing on Plaintiff's
3 motion.

4 DATED this 6th day of August, 2013.

5
6 
7 The Fine Law Group
8 FRANCES-ANN FINE, ESQ.
9 Nevada Bar No. 0025
Attorney for Plaintiff
MARIA DANIELA PERDOMO

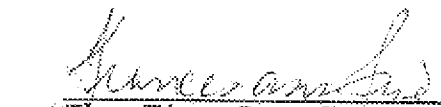
10 NOTICE OF MOTION

11 TO: WESLEY ALLEN LEWIS, Defendant

12 TO: PATRICIA A. MARR, ESQ., Attorney for Defendant:

13 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the
14 undersigned will bring Plaintiff's Motion To Compel Discovery
15 Responses And For Award Of Attorney's Fees And Ex Parte
16 Application For Order Shortening Time on for hearing before the
17 Discovery Commissioner of above-entitled Court on 9/6/2013
18 1:30 PM

19 DATED this 6th day of August, 2013.

20
21 
22 The Fine Law Group
23 FRANCES-ANN FINE, ESQ.
24 Nevada Bar No. 0025
Attorney for Plaintiff
MARIA DANIELA PERDOMO

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1 the parties to serve and file a Pre-Evidentiary Hearing Brief no
2 later than August 22, 2013. An ordinary course setting of the
3 hearing on the instant motion will be beyond the August 22, 2013
4 deadline for filing the Pre-Evidentiary Hearing Brief as well as
5 beyond the evidentiary hearing date (rendering the motion moot) or
6 take place so close in time to the evidentiary hearing as to
7 render it impossible for Plaintiff to be able to prepare for said
8 evidentiary hearing.

9 7. Based upon the foregoing, it is submitted that good
10 cause has been shown for an expedited hearing on Plaintiff's
11 instant motion, and it is respectfully requested that the Court
12 enter an order shortening the time for the hearing on said motion
13 to the earliest date available to the Court.

14 DATED this 6th day of August, 2013.

15
16 
17 FRANCES-ANN FINE

18 POINTS AND AUTHORITIES

19 I.
20 FACTS

21 This matter was last before the District Court for
22 hearing on June 4, 2013. An order filed on July 15, 2013 setting
23 forth the Court's rulings provides in pertinent part as follows:

24 IT IS FURTHER ORDERED that an Evidentiary Hearing be
25 conducted on August 29, 2013 commencing at 1:30 p.m.
26 Issues to be considered at the Evidentiary Hearing shall
27 be:

28 (1) The Order To Show Cause why Defendant should not be
held in contempt of court for his failure to pay ordered
child support;

(2) Plaintiff's request for a judgment for child support
arrears;

1 (3) The imposition of a monthly payment on child support
2 arrears;

3 (4) A current child support obligation/sharing of minor
4 child's expenses; and

5 (5) A determination as and for attorney's fees.

6 In order to prepare for the August 29, 2013 Evidentiary
7 Hearing, on June 12, 2013 interrogatories and requests to produce
8 were served by mail upon Defendant's counsel. On July 15, 2013
9 Defendant's Response To Plaintiff's First Set Of Interrogatories (a
10 copy of which is attached hereto as **Exhibit "1"**) and Defendant's
11 Response To Plaintiff's First Request For Production Of Documents
12 (a copy of which - minus the accompanying produced documents - is
13 attached hereto as **Exhibit "2"**).

14 As noted in the undersigned counsel's accompanying
15 Declaration, on July 24, 2013 a letter was faxed to Defendant's
16 counsel detailing the deficiencies in Defendant's discovery
17 responses. A copy of this letter is attached hereto as **Exhibit**
18 **"3"**. As can be seen, the letter requested that Defendant's counsel
19 arrange for a mutually convenient time to conduct a discovery
20 dispute telephone conference. Defendant's counsel failed to
21 respond in any way to the July 24, 2013 letter. Thus, this motion
22 is being filed.

23 **II.**
APPLICABLE LAW

24 EDCR 5.37 provides as follows:

25 "Rule 2.34 applies to discovery disputes, discovery
26 conferences and related matters in the family division."

27 EDCR 2.34 provides in pertinent part as follows:

28 "(a) Unless otherwise ordered, all discovery disputes
(except disputes presented at a pre-trial conference or

1 at trial) must first be heard by the Discovery
2 Commissioner."

3
4 "(d) Discovery motions may not be filed unless an
5 affidavit of moving counsel is attached thereto setting
6 forth that after a discovery dispute conference or a good
7 faith effort to confer, counsel have been unable to
8 resolve the matter satisfactorily. A conference requires
9 either a personal or telephone conference between or
10 among counsel. Moving counsel must set forth in the
11 affidavit what attempts to resolve the discovery dispute
12 were made, what was resolved and what was not resolved,
13 and the reasons therefor. If a personal or telephone
14 conference was not possible, the affidavit shall set
15 forth the reasons.

16 If the responding counsel fails to answer the discovery,
17 the affidavit shall set forth what good faith attempts
18 were made to obtain compliance. If, after request,
19 responding counsel fails to participate in good faith in
20 the conference or to answer the discovery, the court may
21 require such counsel to pay to any other party the
22 reasonable expense, including attorney's fees, caused by
23 the failure. When a party is not represented by counsel,
24 the party shall comply with this rule.

25
26"

27 NRCP 37 provides in pertinent part as follows:
28 "(a) A party, upon reasonable notice to other parties and
all persons affected thereby, may apply for an order
compelling disclosure or discovery as follows:

(1) An application for an order to a party may be
made to the court in which the action is pending, or, on
matters relating to a deposition, to the court in the
district where the deposition is being taken. An
application for an order to a deponent who is not a party
shall be made to the court in the district where the
deposition is being, or is to be taken.

(2) Motion.

(A) If a party fails to make a disclosure required
by Rule 16.1(a), any other party may move to compel
disclosure and for appropriate sanctions. The motion
must include a certification that the movant has in good
faith conferred or attempted to confer with the party not
making the disclosure in an effort to secure the
disclosure without court action.

(B) If a deponent fails to answer a question
propounded or submitted under Rules 30 or 31, or a

1 corporation or other entity fails to make a designation
2 under Rule 30(b)(6) or 31(a), or a party fails to answer
3 an interrogatory submitted under Rule 33, or a party, in
4 response to a request for inspection submitted under Rule
5 34, fails to respond that inspection will be permitted as
6 requested or fails to permit inspection as requested, the
7 discovery party may move for an order compelling
8 inspection in accordance with the request. The motion
9 must include a certification that the movant has in good
10 faith conferred or attempted to confer with the person or
11 party failing to make the discovery in an effort to
12 secure the information or material without court action.
13 When taking a deposition on oral examination, the
14 proponent of the question may complete or adjourn the
15 examination before applying for an order.

16 (3) For purposes of this subdivision an evasive or
17 incomplete disclosure, answer or response is to be
18 treated as a failure to disclose, answer or respond.

19 (4)(A) If the motion is granted or if the
20 disclosure or requested discovery is provided after the
21 motion was filed, the court shall, after affording an
22 opportunity to be heard, require the party or deponent
23 whose conduct necessitated the motion or the party or
24 attorney advising such conduct or both or them to pay to
25 the moving party the reasonable expenses incurred in
26 making the motion, including attorney's fees, unless the
27 court finds that the motion was filed without the movant
28 first making a good faith effort to obtain the disclosure
or discovery without court action, or that the opposing
party's nondisclosure, response or objection was
substantially justified, or that other circumstances make
an award of expenses unjust.

..."

20 **III.**
21 **FULL AND COMPLETE DISCOVERY RESPONSES**
22 **SHOULD BE ORDERED BY A DATE CERTAIN**

23 Defendant's deficient discovery responses are his answers
24 to interrogatories numbers 4, 12 and 14; and his responses to
25 requests to produce numbers 1, 4, 11 and 12. In an effort to
26 resolve the discovery dispute without court intervention, the
27 undersigned counsel's July 24, 2013 letter to opposing counsel
28 (Exhibit "3" attached hereto) set forth in detail the manner in
which Defendant's responses failed to fulfill his discovery

1 responsibilities.

2 In the interest of brevity, rather than repeat the
3 contents of the aforementioned letter, the Court's attention is
4 respectfully directed to that letter for Plaintiff's position as to
5 the current discovery dispute, as though it were fully set forth in
6 this motion. It is requested that an order be entered requiring
7 Defendant to respond fully and completely to the subject discovery
8 requests by a date certain.

9 IV.

10 MARIA SHOULD BE AWARDED HER ATTORNEY FEES

11 As has been shown, Defendant has failed to comply with
12 his discovery obligations by responding fully and completely to all
13 the discovery requests served upon him. The record further
14 reflects that Plaintiff's counsel has made a sincere and good faith
15 effort of resolve this discovery dispute without court intervention
16 by providing Defendant's counsel with a detailing of Plaintiff's
17 position on the discovery responses and an effort to arrange for a
18 discovery dispute telephone conference. This has been met with
19 utter silence from Defendant. For that reason, it is submitted
20 that Plaintiff should be awarded her attorney fees incurred
21 relative to obtaining the discovery responses.

22 DATED this 6th day of August, 2013.


23
24 
The Fine Law Group
25 FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
26 Attorney for Plaintiff
MARIA DANIELA PERDOMO
27
28

EXHIBIT "1"

REC'D JUL 15 2013

1 PATRICIA A. MARR, LTD.
2 PATRICIA A. MARR, ESQ.
3 Nevada Bar No. 8846
4 4305 Dean Martin Dr., Ste. 185
5 Las Vegas, Nevada 89103
6 (702) 353-4225 (phone)
7 (702) 737-1776 (fax)
8 Lvlaw03@yahoo.com
9 Attorney for Defendant
10 WESLEY ALLEN LEWIS

11 DISTRICT COURT
12 FAMILY DIVISION
13 CLARK COUNTY, NEVADA

14 MARIA DANIELA LEWIS aka)
15 MARIA DANIELA PERDOMO,)
16)
17 Plaintiff,)

Case No. D-10-427054
Dept No. T

18 v.)

19 WESLEY ALLEN LEWIS,)
20)
21 Defendant.)

DEFENDANT'S RESPONSE
TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES

22 COMES NOW, Defendant, WESLEY ALLEN LEWIS, by and through his counsel,
23 PATRICIA A. MARR, ESQ. of PATRICIA A. MARR, LTD., and submits his Response to
24 Plaintiff's First Set of Interrogatories as follows.

25 Dated this 17th day of July, 2013.

26 PATRICIA A. MARR, LTD.

27 PATRICIA A. MARR, ESQ.
28 4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103
(702) 353-4225 (phone)
(702) 737-1776 (fax)
Lvlaw03@yahoo.com

1 INTERROGATORY NO. 1: State your full name, your date of birth, place of birth, and your social
2 security number.

3 RESPONSE TO INTERROGATORY NO. 1: Wesley Allen Lewis; DOB: 7/23/1977; Place of
4 birth: Las Vegas, Nevada; SSN: 530947093.

5
6 INTERROGATORY NO. 2: State the address where you currently reside. As to that residence:

- 7 (A) Who is the owner of that address;
8 (B) For what period have you resided at that address;
9 (C) Provide the names and ages of all individuals who reside at that address;
(D) State how many bedrooms are being utilized at that address.

10 RESPONSE TO INTERROGATORY NO. 2: 4650 Idaho Ave., Las Vegas, NV 89104

- 11 (A) Olga Lewis
12 (B) 14 years
13 (C) Olga Lewis (64), Sid Lewis (72), Wesley Allen Lewis (35), Isabella Sarah Lewis (6)
14 (D) Objection this Interrogatory is not relevant to the issues at hand. Notwithstanding said
objection, 3 bedrooms are utilized at the residence.

15 INTERROGATORY NO. 3: For the period from January 1, 2011, forward, state the name and
16 address of each employer you have had. For each such employer, provide the dates of your
17 employment, your job title, weekly work schedule, and rate of pay.

18
19 RESPONSE TO INTERROGATORY NO. 3: Objection, this Interrogatory is not relevant with
20 respect to the time period requested prior to the parties' divorce. Notwithstanding said objection:
21 Gregorys 4887 Alpha Rd., #205, Dallas, TX 75244; sales associate; \$15 an hour +3% commission
22 off of shoes 2% commission off of clothing; 11/30/2010-10/1/2011

23 Marshall retail group 5385 Wynn Rd., Las Vegas, NV 89118; sales associate; nine dollars an hour
24 versus 6% commission; 10/1/2012 - present

25 INTERROGATORY NO. 4: For the period from June 2011 forward, list each child support
26 payment you have made to Plaintiff, setting forth the amount and date of each such payment.

27
28 RESPONSE TO INTERROGATORY NO. 4: Objection, this Interrogatory is not relevant with

1 respect to the time period requested prior to the parties' divorce and requires evidence already in
2 the possession of Plaintiff. Notwithstanding said objection, Plaintiff has already been provided
3 with the NCP Financial Transaction History for this action.
4

5 INTERROGATORY NO. 5: For the period from June 2011 forward, list each payment you have
6 made to maintain medical insurance to cover the parties' minor child including the date of each
7 payment and its amount.
8

9 RESPONSE TO INTERROGATORY NO. 5: Objection, this Interrogatory is not relevant with
10 respect to the time period requested prior to the parties' divorce. Notwithstanding said objection:
11 medical insurance was maintained for the minor child from June, 2011, through October, 2011, at
12 the costs of \$207 per month.
13

14 INTERROGATORY NO. 6: Identify all monetary accounts in all financial institutions in which
15 you have or have had an interest (whether or not you name is on the account), in which you have
16 made a deposit or from which you have made a withdrawal, from January 1, 2011 forward,
17 including but not limited to: checking, savings, certificates of deposit and IRA accounts. Such
18 identification shall include the name of each such financial institution and account numbered
19 associated therewith.
20

21 RESPONSE TO INTERROGATORY NO. 6: Objection, this Interrogatory is not relevant with
22 respect to the time period requested prior to the parties' divorce. Notwithstanding said objection:
23 savings account with stage employees Federal credit Union; account number is
24 012487776759001008179.
25

26 INTERROGATORY NO. 7: For the period from January 1, 2011, forward, have you applied for
27 unemployment benefits? If not, why not? If so, was your application granted and for what period
28

1 did you receive unemployment benefits?

2 RESPONSE TO INTERROGATORY NO. 7: Objection, this Interrogatory is not relevant with
3 respect to the time period requested prior to the parties' divorce. Notwithstanding said objection:
4 I did not apply for unemployment benefits on the basis that I was informed there was a non-fraud
5 overpayment that I didn't receive. Because I did not have the funds to resolve the issue I could not
6 apply for additional benefits.
7

8 INTERROGATORY NO. 8: State the reason why your employment with Gregory's was
9 terminated.
10

11 RESPONSE TO INTERROGATORY NO. 8: Objection, this Interrogatory is not accurate. I was
12 never terminated by Gregorys, rather, I was granted personal leave. The basis I required personal
13 leave was related to my pending divorce. Maria's antics during the proceedings distracted me from
14 work and otherwise had an effect that reverberated throughout my place of employment, in addition
15 to adversely affecting my performance to the extent my employer deemed it necessary to provide
16 me with personal time off. Upon my return, the company had moved it location.
17

18 INTERROGATORY NO. 9: For the period from June 2011 forward, list all expenditures you have
19 made for the benefit of the parties' minor child, including but not limited to daycare, pre-school,
20 kindergarten, dance classes, gymnastic classes, tutoring, clothes and medical bills.
21

22 RESPONSE TO INTERROGATORY NO. 9: Objection, this Interrogatory is not relevant with
23 respect to the time period requested prior to the parties' divorce. Notwithstanding said objection:
24 Expenditures made for the benefit of the minor child Isabelle Lewis, besides essential living
25 expenses, include *inter alia*, her lunch while she was attending Hillindale, school pictures from
26 Twitchell Elementary, for which I gave Plaintiff half, tutoring with her first grade teacher Naomi
27
28

1 Florez when Maria decided that she was no longer going to pay for it she asked me to handle that
2 which I did, clothing and recreational club activities.

3 INTERROGATORY NO. 10: As for \$90.00 per month storage charges you pay as reflected in
4 Defendant's Financial Disclosure Form filed May 29, 2013, identify the entity to whom those
5 payments are made, the address where you have items stored, and an itemization of the items you
6 have in storage.

7
8 RESPONSE TO INTERROGATORY NO. 10: The monthly ministorage is located at 2975
9 Southmeadows Blvd., Las Vegas, NV 89121 unit number C057, Oasis Meadows. The items in
10 storage consist of Inter alia, items from the apartment that Isabella and myself lived at, including
11 couches, tables, dining chairs, bed frame, loveseat, beanbags, clothing, daily essentials, pots and
12 pans.
13

14
15 INTERROGATORY NO. 11: What medications do you purchase that make up the \$120.00 per
16 month expenditure for "medications" reflected in Defendant's Financial Disclosure Form filed May
17 29, 2013, what physician(s) prescribed such medication, and what health condition is such
18 medication to address.
19

20 RESPONSE TO INTERROGATORY NO. 11: Adderall, Xanax and Ambien for ADHD attention
21 deficit hyperactivity disorder, diagnosed in 1998. My current doctor is Dr. James Meli.

22 INTERROGATORY NO. 12: List the name, address, telephone number, and dates of contact for
23 each physician or dentist to whom you have personally taken the parties' minor child for evaluation
24 or treatment.
25

26 RESPONSE TO INTERROGATORY NO. 12: Dr. Richard Weiner, Desert Pediatrics, 2150 S
27 Eastern Ave., Las Vegas; (702) 641-2150. This response will be supplemented.
28

1 INTERROGATORY NO. 13: State the names, addresses and telephone numbers of and every
2 witness you plan on calling to testify on your behalf at the evidentiary hearing scheduled in this
3 matter.

4 RESPONSE TO INTERROGATORY NO. 13:
5

- 6 1. Wesley Allen Lewis
7 c/o Patricia A. Marr, Esq.
8 4305 Dean Martin Dr., Ste. 185
9 Las Vegas, Nevada 89103
10 (702) 353-4225
- 11 2. Maria Lewis aka Maria Perdomo
12 c/o Frances Fine, Esq.
13 8975 South Pecos Road, Ste. 5
14 Henderson, Nevada 89074
- 15 3. Sid Lewis
16 4650 Idaho Avenue
17 Las Vegas, Nevada 89104
18 (702) 432-3996
- 19 4. Naomi Flores
20 2060 Desert Shadow Trail
21 Henderson, NV 89012
22 (702) 336-6292
- 23 5. Andrew Lewis
24 4650 Idaho Avenue
25 Las Vegas, Nevada 89104
26 (702) 818-9458

27 Discovery is continuing and Defendant reserves the right to supplement his list of witnesses.

28 INTERROGATORY NO. 14: Identify by name and description all documents which you plan to
offer as proposed exhibits at the evidentiary hearing scheduled in this matter.

RESPONSE TO INTERROGATORY NO. 14:

1. All documents provided in Defendant's discovery responses, specifically, Defendant's responses to Plaintiff's request for production of documents herewith;

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2. All documents previously provided to Plaintiff subsequent to the divorce proceedings herein.

Discovery is continuing and Defendant reserves the right to supplement his list of documents.

Dated this 17th day of July, 2013.

PATRICIA A. MARR, LTD.



PATRICIA A. MARR, ESQ.
Nevada Bar No. 8846
4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103
(702) 353-4225 (phone)
(702) 737-1776 (fax)
Lvlaw03@yahoo.com


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VERIFICATION

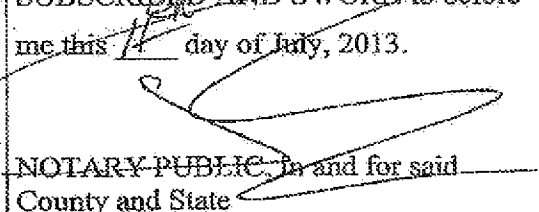
STATE OF NEVADA
COUNTY OF CLARK

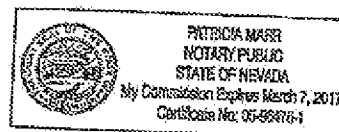
WESLEY LEWIS, under penalty of perjury, makes the following assertions:

He is a Defendant in the above-entitled action; that he has read the foregoing *DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT* and knows the contents thereof; that the same is true of his own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, he believes it to be true.


WESLEY LEWIS

SUBSCRIBED AND SWORN to before
me this 14 day of July, 2013.

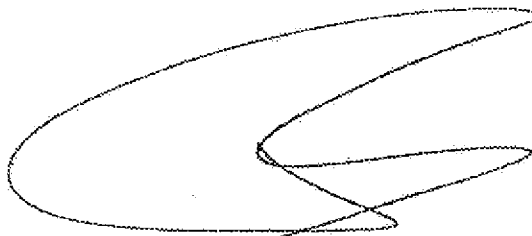

NOTARY PUBLIC, in and for said
County and State



CERTIFICATE OF MAILING

I hereby certify that on the 11th day of July, 2013, a copy of *Defendant's Response to Plaintiff's First Set of Interrogatories* was sent via United States Mail, postage prepaid to the following:

Fran Fine, Esq.
8975 South Pecos Rd., Ste. 5
Las Vegas, Nevada 89074



An employee of Patricia A. Marr, Ld.

EXHIBIT "2"

REC'D JUL 15 2013

1 PATRICIA A. MARR, LTD.
2 PATRICIA A. MARR, ESQ.
3 Nevada Bar No. 8846
4 4305 Dean Martin Dr., Ste. 185
5 Las Vegas, Nevada 89103
6 (702) 353-4225 (phone)
7 (702) 737-1776 (fax)
8 Lvlaw03@yahoo.com
9 Attorney for Defendant
10 WESLEY ALLEN LEWIS

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

11 MARIA DANIELA LEWIS aka
12 MARIA DANIELA PERDOMO,

13 Plaintiff,

14 v.

15 WESLEY ALLEN LEWIS,

16 Defendant.

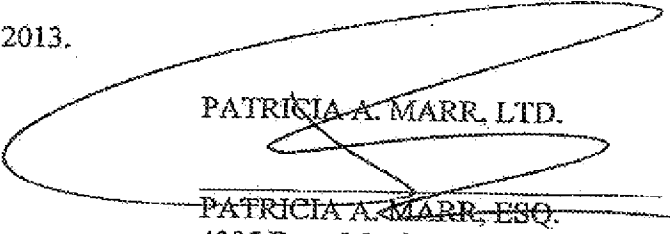
Case No. D-10-427054
Dept No. T

DEFENDANT'S RESPONSE
TO PLAINTIFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS

18 COMES NOW, Defendant, WESLEY ALLEN LEWIS, by and through his counsel,
19 PATRICIA A. MARR, ESQ. of PATRICIA A. MARR, LTD., and submits his Response to
20 Plaintiff's First Request for Production of Documents as follows.
21

22 Dated this 17th day of July, 2013.

23 PATRICIA A. MARR, LTD.

24 
25 PATRICIA A. MARR, ESQ.
26 4305 Dean Martin Dr., Ste. 185
27 Las Vegas, Nevada 89103
28 (702) 353-4225 (phone)
(702) 737-1776 (fax)
Lvlaw03@yahoo.com

1 REQUEST NO. 1: Copies of any and all documents showing your income and earnings from all
2 sources, to include copies of any and all Federal Income Tax Returns, W-2 Statements, 1099
3 Forms, and/or pay stubs received by you from any employer for which you are, or were, employed,
4 for the period beginning January 1, 2011, forward.
5

6 RESPONSE TO NO. 1: Objection, this Request is not relevant with respect to the time period
7 requested prior to the parties' divorce. Notwithstanding said objection see Exhibit A.
8

9 REQUEST NO. 2: Copies of any and all documentation evidencing expenditures you have made
10 from January 1, 2011, forward for the benefit of the parties' minor child, including but not limited
11 to day care, pre-school, kindergarten, dance classes, gymnastics, tutoring, clothes, and medical
12 bills.
13

14 RESPONSE TO NO. 2: Objection, this Request is not relevant with respect to the time period
15 requested prior to the parties' divorce. Notwithstanding said objection see Exhibit B.
16

17 REQUEST NO. 3: Copies of any and all documentation for the period from January 1, 2011,
18 forward evidencing medical insurance you maintained to cover the parties' minor child, reflecting
19 the period that said insurance was maintained and the monthly cost of maintain same.
20

21 RESPONSE TO NO. 3: Objection, this Request is not relevant with respect to the time period
22 requested prior to the parties' divorce. Notwithstanding said objection see Exhibit C.
23

24 REQUEST NO. 4: For the period from January 1, 2011, forward, copies of all monthly, semi-
25 monthly, annual or any other periodic account statements for any accounts in financial institutions
26 in which you have, or have had, an interest or made deposits or withdrawals from, including but not
27 limited to, checking accounts, savings accounts, stocks, mutual funds, IRAs, 401(k)s, pensions,
28 profit sharing an retirement accounts.

1 RESPONSE NO. 4: Objection, this Request is not relevant with respect to the time period
2 requested prior to the parties' divorce. Notwithstanding said objection see Exhibit D.

3 REQUEST NO. 5: For the period from January 1, 2011 forward, copies of any and all
4 documentation evidencing your payment of residential rent (currently represented to be \$350.00 per
5 month) as set forth in Defendant's Financial Disclosure Form filed May 29, 2013).

7 RESPONSE NO. 5: Objection, this Request is not relevant with respect to the time period
8 requested prior to the parties' divorce. Notwithstanding said objection see Exhibit E.

9 REQUEST NO. 6: Copies of any and all documentation evidencing the source of the funds utilized
10 to pay the \$1,500.00 retainer reflected in Defendant's Financial Disclosure Form filed May 29,
11 2013.

13 RESPONSE NO. 6: See Exhibit F.

14 REQUEST NO. 7: Copies of any and all documentation evidencing the \$90.00 per month storage
15 charges reflected in Defendant's Financial Disclosure Form filed May 29, 2013, including those
16 identifying the name, address and telephone number of the entity to whom Defendant pays the
17 aforementioned storage charges and the location of the storage facility.

19 RESPONSE TO NO. 7: See Exhibit G.

21 REQUEST NO. 8: Copies of any and all documentation evidencing Defendant's expenditure of
22 \$120.00 per month for "medications" as reflected in Defendant's Financial Disclosure Form filed
23 May 29, 2013, including the name of said medication and the physician(s) who prescribed said
24 medication.

26 RESPONSE TO NO. 8: See Exhibit H.

27 REQUEST NO. 9: Copies of any and all documentation relating to the termination of any of
28

1 Defendant's employment (including but not limited to Defendant's employment by Gregory's)
2 from January 1, 2013 forward including but not limited to any termination notice or notice to quit.

3 RESPONSE TO NO. 9: Objection, this Request is not relevant with respect to the time period
4 requested prior to the parties' divorce. Notwithstanding said objection, no such documentation
5 exists.
6

7 REQUEST NO. 10: For the period from January 1, 2011 forward, copies of any and all
8 documentation relating to your receipt of unemployment benefits including all documents you
9 completed applying for same and any documents you received from any governmental agency
10 relating to said benefits.
11

12 RESPONSE TO NO. 10: Objection, this Request is not relevant with respect to the time period
13 requested prior to the parties' divorce. Notwithstanding said objection see Exhibit I.
14

15 REQUEST NO. 11: For the period from January 1, 2011 forward, copies of any and all credit card
16 receipts, statements, correspondence and/or any other billing records for any account or debt for
17 which you are, or have been responsible for payment. This request shall include, but is not limited
18 to, all credit card statements, mortgage statements, installment debts, property or other asset
19 encumbrances, and personal loans.
20

21 RESPONSE TO NO. 11: This response will be supplemented.
22

23 REQUEST NO. 12: Copies of any and all documents which you or your attorney intend to offer as
24 proposed exhibits at the evidentiary hearing scheduled in this matter.

25 RESPONSE TO NO. 12: See responses herein and documents attached hereto. Defendant intends
26 to use any and all documents produced to Plaintiff subsequent to the parties' divorce in June, 2011.
27
28

1 Discovery is continuing and Defendant reserves the right to supplement his documents.

2 Dated this 17th day of July, 2013.

3 PATRICIA A. MARR, LTD.
4

5
6
7 PATRICIA A. MARR, ESQ.
8 Nevada Bar No. 2846
9 4305 Dean Martin Dr., Ste. 185
10 Las Vegas, Nevada 89103
11 (702) 353-4225 (phone)
12 (702) 737-1776 (fax)
13 Lvlaw03@yahoo.com

14 CERTIFICATE OF MAILING

15 I hereby certify that on the 17th day of July, 2013, a copy of *Defendant's Response to*
16 *Plaintiff's First Request for Production of Documents* was sent via United States Mail, postage
17 prepaid to the following:

18 Fran Fine, Esq.
19 8975 South Pecos Rd., Ste. 5
20 Las Vegas, Nevada 89074

21
22 An employee of Patricia A. Marr, Ltd.
23
24
25
26
27
28

EXHIBIT "3"

THE

Fine Law Group

A PROFESSIONAL CORPORATION

Frances-Ann Fine, Esquire
Corinne Price, Esquire

Litigation Administrator
Earl T. Ayers

July 24, 2013

VIA FACSIMILE ONLY: 737-1776

Patricia A. Marr, Esq.
4305 Dean Martin Drive, Ste. 185
Las Vegas, Nevada

RE: Maria Perdomo v. Wesley Lewis
CASE NUMBER D-10-427054-D

Dear Ms. Marr:

The purpose of this letter is to comply with the requirements that counsel confer to resolve discovery disputes. On July 15, 2013 I received copies of Defendant's Response To Plaintiff's First Request For Production Of Documents and Defendant's Response To Plaintiff's First Set Of Interrogatories, both of which reflected they had been placed in the mail on July 11, 2013.

It is clear that the discovery responses were timely served, thereby preserving legitimate objections. However, it is submitted that in many instances the responses contain objections that are not well-founded and are otherwise insufficient. My position on same is set forth below.

Response To Interrogatory No. 4

Interrogatory No. 4 sought the detailing of each child support payment Mr. Lewis made to Ms. Perdomo from June 2011 forward, "setting forth the amount and date of each such payment. The Response was as follows:

"Objection, this Interrogatory is not relevant with respect to the time period requested prior to the parties' divorce and requires evidence already in the possession of Plaintiff. Notwithstanding said objection, Plaintiff has already been provided with the NCP Financial Transaction History for this action."

8975 South Pecos Road
Henderson, Nevada 89074
Telephone (702) 384-8900 Facsimile (702) 384-6900

Patricia A. Marr, Esq.
July 24, 2013
Page Two

I respectfully submit that the objection that has been interposed is without merit. The prove-up of the parties' divorce was conducted on May 26, 2011, and the Decree (on page 2) expressly states that Mr. Lewis' child support obligation contained therein is "effective June 2011". The interrogatory limits itself to the period beginning June 2011. Thus, the objection should be withdrawn.

If Mr. Lewis is conceding that the NCP Financial Transaction History does in fact accurately reflect all child support payments he has made to Ms. Perdomo from June 2011 forward, then his Response should say so. Otherwise, he must list all the child support payments and provide the amounts and dates of each.

Response To Interrogatory No. 12

Your client's response to Interrogatory No. 12 provided the name, address and telephone number of Dr. Weiner and further stated that "This response will be supplemented". The evidentiary hearing is rapidly approaching, and Mr. Lewis must provide the dates that he personally took the parties' minor child to Dr. Weiner and any other physician or dentist.

Response To Interrogatory No. 14

This interrogatory requested that Mr. Lewis "identify by name and description all documents which you plan to offer as proposed exhibits". While the response refers specifically to those documents produced in response to the request to produce, it also adds "all documents previously provided to Plaintiff subsequent to the divorce proceedings herein". This latter category of documents is so vague as to be meaningless.

Response To Request No. 1

Mr. Lewis' response fails to produce copies of his 2011 and 2012 tax returns. In view of the fact that he has had a federal tax refund intercepted due to his child support arrears, it is clear that tax returns were filed. Therefore, the missing returns must be produced.

Response To Request No. 4

Request No. 4 seeks production of all statements of Mr. Lewis' financial accounts from January 1, 2011 forward. In Defendant's Response To Plaintiff's First Set Of Interrogatories, Mr. Lewis represented that his only financial account during this period has been Stage Employees Federal Credit Union Account No. 012487776759001008179.

8975 South Pecos Road
Henderson, Nevada 89074
Telephone (702) 384-8900 Facsimile (702) 384-6900

Patricia A. Marr, Esq.
July 24, 2013
Page Three

Mr. Lewis' response to Request No. 4 produced copies of only a July 19, 2013 withdrawal slip and a single account statement for the period from July 1, 2011 through September 30, 2011. The missing statements for this account must be produced, and they are readily available as a computer print-out at his credit union.

Response To Request No. 11

Mr. Lewis' response fails to provide any of his credit card statements. Instead the sole response is "This response will be supplemented." When will they be produced?

Response To Request No. 12

As reflected above in the discussion of Mr. Lewis' response to Interrogatory No. 14, the response "Defendant intends to use any and all documents produced to Plaintiff subsequent to the parties' divorce in June, 2011" is not sufficient. It fails to identify in any meaningful sense of the word proposed exhibits and obviously fails to produce them.

I am out of the State of Nevada at this time, but will be returning early next week. Please contact my office to schedule a telephone discovery dispute conference for either July 30, 2013 or July 31, 2013 at a mutually convenient time. Unless these discovery issues are resolved by August 1, 2013, I will have no alternative but to proceed with an appropriate motion.

Very truly yours,

FRANCES-ANN FINE

FRANCES-ANN FINE

FAF/EA/s

Dictated but not read

Copy to Ms. Maria Perdomo

8975 South Pecos Road
Henderson, Nevada 89074
Telephone (702) 384-8900 Facsimile (702) 384-6900

Send Result Report

MFP

TASKalfa 4500i

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THE

Fine Law Group

A PROFESSIONAL CORPORATION

Francis-Arn Fine, Esquire
Corinne Price, Esquire

Litigation Administrator
Earl T. Ayers

July 24, 2013

VIA FACSIMILE ONLY: 737-1776

Patricia A. Marr, Esq.
4305 Dean Martin Drive, Ste. 185
Las Vegas, Nevada

RE: Maria Ferdome v. Wesley Lewis
CASE NUMBER D-10-427054-D

Dear Ms. Marr:

The purpose of this letter is to comply with the requirements that counsel confer to resolve discovery disputes. On July 15, 2013 I received copies of Defendant's Response To Plaintiff's

No.	Date and Time	Destination	Times	Type	Result	Resolution/EOM
001	07/24/13 13:07	7371776	0°00'30"	FAX	OK	200x100 Normal/On

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Maria Perdomo
Plaintiff/Petitioner

-vs-

Nesha Lewis
Defendant/Respondent

CASE NO. D-16-427054-D

DEPT. T / Discovery

FAMILY COURT MOTION/OPPOSITION
FEE INFORMATION SHEET (NRS 19.0312)

Party Filing Motion/Opposition: ☒ Plaintiff/Petitioner ☐ Defendant/Respondent

MOTION FOR/OPPOSITION TO _____

Notice

Motions and Oppositions to
Motions filed after entry of
final Decree or Judgment
(pursuant to NRS 125,
125B & 125C)
are subject to the Re-open
Filing Fee of \$25.00, unless
specifically excluded.
(See NRS 19.0312)

Excluded Motions/Oppositions

- ☐ Motions filed before final Divorce/Custody Decree entered
(Divorce/Custody Decree NOT final)
- ☐ Child Support Modification ONLY
- ☐ Motion/Opposition For Reconsideration (Within 10 days of Decree)
Date of Last Order _____
- ☐ Request for New Trial (Within 10 days of Decree)
Date of Last Order _____
- ☒ Other Excluded Motion _____
(Must be prepared to defend exclusion to Judge)

NOTE: If no boxes are checked, filing fee **MUST** be paid.

☐ Motion/Opp IS subject to \$25.00 filing fee ☒ Motion/Opp IS NOT subject to filing fee

Date: August 12, 2013

Tamara Prebber
Printed Name of Preparer

[Signature]
Signature of Preparer


CLERK OF THE COURT

1 ORD
2 The Fine Law Group
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 corinne@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT
CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka)	
10 MARIA DANIELA PERDOMO)	
)	
11 Plaintiff,)	CASE NO: D-10-427054-D
)	DEPT NO: T/Discovery
12 vs.)	
)	DATE OF HEARING: 8-29-13
13 WESLEY ALLEN LEWIS,)	TIME OF HEARING: 1:30 p.m.
)	
14 Defendant.)	

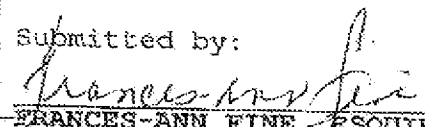
ORDER SHORTENING TIME

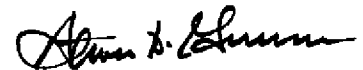
16 THIS MATTER having come before the Court on Plaintiff's
17 ex parte application for an order shortening time; the Court having
18 reviewed all papers and pleadings on file herein including the
19 Declaration of Plaintiff's counsel, and good cause appearing,

20 IT IS HEREBY ORDERED that the hearing on Plaintiff's
21 Motion To Compel Discovery Responses And For Award Of Attorney Fees
22 be conducted before the Discovery Commissioner on the 9th day of
23 August 2013 at the hour of 1:30 p.m.

24 DATED this 6th day of Aug, 2013.


DISCOVERY COMMISSIONER

26 Submitted by:
27 
28 FRANCES-ANN FINE, ESQUIRE



CLERK OF THE COURT

ROC
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

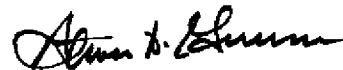
MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT. NO. T
vs.)	
)	DATE OF HEARING: 08/09/2013
)	TIME OF HEARING: 1:30 a.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

RECEIPT OF COPY

On this 6th day of August, 2013, a copy of ORDER
SHORTENING TIME was delivered to and receipt of same is hereby
acknowledged:



Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Dr., Ste. #185
Las Vegas, Nevada 89103



CLERK OF THE COURT

1 NEOJ
2 THE FINE LAW GROUP
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 Attorney for Plaintiff
10 MARIA DANIELA LEWIS nka
11 MARIA DANIELA PERDOMO

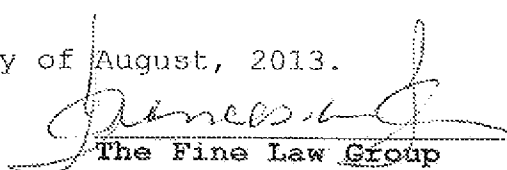
DISTRICT COURT
CLARK COUNTY, NEVADA

12 MARIA DANIELA LEWIS nka)
13 MARIA DANIELA PERDOMO,)
14 Plaintiff,) CASE NO. D-10-427054-D
15 vs.) DEPT. NO. T
16) DATE OF HEARING: 08/09/2013
17 WESLEY ALLEN LEWIS,) TIME OF HEARING: 1:30 p.m.
18)
19 Defendant.)
20)

NOTICE OF ENTRY OF ORDER SHORTENING TIME

21 TO: WESLEY ALLEN LEWIS, Defendant; and
22 TO: PATRICIA A. MARR, ESQUIRE, Attorney for Defendant;
23 YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an
24 ORDER SHORTENING TIME, a copy of which is attached hereto, was
25 entered and filed in the above-entitled matter on the 6th day of
26 August, 2013.

27 DATED the 8 day of August, 2013.



28 The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 S. Pecos Road, Ste. 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

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Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Dr., Ste. #185
Las Vegas, Nevada 89103

An Employee of the Fine Law Group

Ann L. Quinn

CLERK OF THE COURT

1 ORD
2 The Fine Law Group
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 cozanne@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO
13

DISTRICT COURT
CLARK COUNTY, NEVADA

14 MARIA DANIELA LEWIS nka
15 MARIA DANIELA PERDOMO

16 Plaintiff,

17 vs.

18 WESLEY ALLEN LEWIS,

19 Defendant.

CASE NO: D-10-427034-D

DEPT NO: T/Discovery

DATE OF HEARING: 8-29-13

TIME OF HEARING: 1:30 p.m.

ORDER SHORTENING TIME

20 THIS MATTER having come before the Court on Plaintiff's
21 ex parte application for an order shortening time; the Court having
22 reviewed all papers and pleadings on file herein including the
23 Declaration of Plaintiff's counsel, and good cause appearing,

24 IT IS HEREBY ORDERED that the hearing on Plaintiff's
25 Motion To Compel Discovery Responses And For Award Of Attorney Fees
26 be conducted before the Discovery Commissioner on the 9th day of
27 August 2013 at the hour of 1:30 p.m.

28 DATED this 6th day of Aug, 2013.

Submitted by:

Frances Ann Fine
FRANCES-ANN FINE, ESQUIRE

[Signature]
DISCOVERY COMMISSIONER

1 ORD
The Fine Law Group
2 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
3 8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
4 Telephone: 702/384-8900
Facsimile: 702/384-6900
5 corinne@thefinelawgroup.com
Attorney for Plaintiff
6 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

7
8 DISTRICT COURT
CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka
10 MARIA DANIELA PERDOMO

11 Plaintiff,

12 vs.

13 WESLEY ALLEN LEWIS,

14 Defendant.

CASE NO: D-10-427054-D

DEPT NO: T/Discovery

DATE OF HEARING: 8-29-13

TIME OF HEARING: 1:30 p.m.

15 ORDER SHORTENING TIME

16 THIS MATTER having come before the Court on Plaintiff's
17 ex parte application for an order shortening time; the Court having
18 reviewed all papers and pleadings on file herein including the
19 Declaration of Plaintiff's counsel, and good cause appearing,

20 IT IS HEREBY ORDERED that the hearing on Plaintiff's
21 Motion To Compel Discovery Responses And For Award Of Attorney Fees
22 be conducted before the Discovery Commissioner on the 9th day of
23 August 2013 at the hour of 1:30 p.m.

24 DATED this 6th day of Aug, 2013.

25
26 DISCOVERY COMMISSIONER
27 dm

26 Submitted by:

27 Frances-Ann Fine
28 FRANCES-ANN FINE, ESQUIRE

1 ORD
The Fine Law Group
2 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
3 8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
4 Telephone: 702/384-8900
Facsimile: 702/384-6900
5 corinne@thefinelawgroup.com
Attorney for Plaintiff
6 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO
7

8 DISTRICT COURT
CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka)
MARIA DANIELA PERDOMO)

10 Plaintiff,)

11 vs.)

12 WESLEY ALLEN LEWIS,)

13 Defendant.)
14

CASE NO: D-10-427054-D

DEPT NO: T/Discovery

DATE OF HEARING: 8-29-13

TIME OF HEARING: 1:30 p.m.

15 ORDER SHORTENING TIME

16 THIS MATTER having come before the Court on Plaintiff's
17 ex parte application for an order shortening time; the Court having
18 reviewed all papers and pleadings on file herein including the
19 Declaration of Plaintiff's counsel, and good cause appearing,

20 IT IS HEREBY ORDERED that the hearing on Plaintiff's
21 Motion To Compel Discovery Responses And For Award Of Attorney Fees
22 be conducted before the Discovery Commissioner on the ____ day of
23 ____, 2013 at the hour of ____ .m.

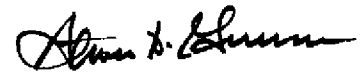
24 DATED this ____ day of ____, 2013.

25
26 DISCOVERY COMMISSIONER

27 Submitted by:

28 FRANCES-ANN FINE, ESQUIRE

ROC
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO



CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO,

Plaintiff,

vs.

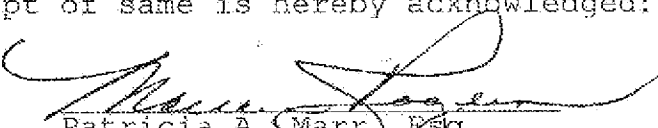
WESLEY ALLEN LEWIS,

Defendant.

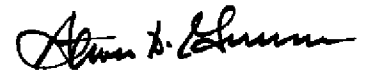
)
)
) CASE NO. D-10-427054-D
) DEPT. NO. T
)
) DATE OF HEARING: 08/09/2013
) TIME OF HEARING: 1:30 a.m.
)
)
)
)

RECEIPT OF COPY

On this 8th day of August, 2013, a copy of Plaintiff's
Motion to Compel Discovery Responses and For Award of Attorney's
Fees and Ex Parte Application for Order Shortening Time was
delivered to and receipt of same is hereby acknowledged:



Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Dr., Ste. #185
Las Vegas, Nevada 89103



CLERK OF THE COURT

1 ORD
2 The Fine Law Group
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka
10 MARIA DANIELA PERDOMO,

Plaintiff,

11 vs.

12 WESLEY ALLEN LEWIS,

13 Defendant.
14

427054
CASE NO. D-10-427043-D
DEPT NO. T
DATE OF HEARING: 6/4/2013
TIME OF HEARING: 9:30 a.m.

15 CONSENT ORDER REGARDING ISSUANCE OF PASSPORT

16 THIS matter having come before the Court on the 4th day
17 of June, 2013 on Plaintiff's Motion to have Defendant Held in
18 Contempt of Court, To Enforce Decree of Divorce, To Reduce Child
19 Support Arrears to Judgment, and For Award Of Attorney Fees and
20 Defendant's Countermotion For Attorney's Fees and Related Relief.
21 The Plaintiff, MARIA PERDOMO, appeared personally and through her
22 counsel, FRANCES-ANN FINE, ESQUIRE of The Fine Law Group, and
23 Defendant, WESLEY LEWIS, appeared personally and through his
24 counsel, PATRICIA MARR, ESQUIRE; the Court having reviewed all
25 papers and pleadings on file herein and having considered the
26 arguments presented and good cause appearing,

27 / / /

RECEIVED
AUG 02 2013
FAMILY COURT
CLERK OF THE COURT

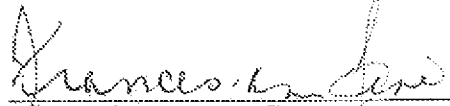
1 IT IS HEREBY ORDERED that the Court hereby authorizes the
2 Plaintiff and mother, MARIA PERDOMO, to obtain a valid passport for
3 issuance for the minor child, herein, to wit: ISABELLA SARA LEWIS,
4 born on the 10th day of August, 2006, as ordered in the Decree of
5 Divorce, Parenting Agreement, filed with this Court previously on
6 the 15th day of July, 2011, allowing the minor child to travel
7 outside of the United States.

8 DATED this 8 day of August, 2013..

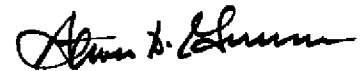
9
10
11 DISTRICT COURT JUDGE
GAYLE NATHAN

12 SUBMITTED BY:

13 APPROVED AS TO FORM AND CONTENT:

14 
15 The Fine Law Group
16 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road
Henderson, NV 89074
17 Telephone: 702-384-8900
Facsimile: 702-384-6900
18 fran@thefinelawgroup.com
Attorneys for Plaintiff
19 MARIA DANIELA PERDOMO fka
MARIA DANIELA LEWIS

PATRICIA A. MARR, LTD
PATRICIA A. MARR, ESQUIRE
Nevada Bar NO. 8846
4305 Dean Martin Dr., Suite 184
Las Vegas, NV 89103
Telephone: 702-353-4225
Facsimile: 702-737-1776
Lvlaw03@yahoo.com
Attorney for Defendant
Wesley Allen Lewis



CLERK OF THE COURT

PATRICIA A. MARR, LTD.
PATRICIA A. MARR, ESQ.
Nevada Bar No. 8846
4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103
(702) 353-4225 (phone)
(702) 737-1776 (fax)
Lvlaw03@yahoo.com
Attorney for Defendant
WESLEY ALLEN LEWIS

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS aka
MARIA DANIELA PERDOMO,

Plaintiff,

v.

WESLEY ALLEN LEWIS,

Defendant.

Case No. D-10-427054

Dept No. T

Hearing Date: 8/29/13

Hearing Time: 1:30 pm

DEFENDANT'S
AMENDED WITNESS LIST AND
DOCUMENT DISCLOSURE

COMES NOW, Defendant, WESLEY ALLEN LEWIS, by and through his counsel,
PATRICIA A. MARR, ESQ. of PATRICIA A. MARR, LTD., and hereby submits his initial list of
witnesses as follows:

1. Wesley Allen Lewis
c/o Patricia A. Marr, Esq.
4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103

Mr. Lewis will testify regarding all issues at the time of evidentiary hearing in this
matter.

2. Maria Lewis aka Maria Perdomo
c/o Frances Fine, Esq.
8975 South Pecos Road, Ste. 5

1 Henderson, Nevada 89074

2 Ms. Perdomo is expected to testify regarding all issues at the time of evidentiary hearing
3 in this matter.

- 4 3. Sid Lewis
5 c/o Patricia A. Marr, Esq.
6 4305n Martin Dr., Ste. 185
7 Las Vegas, Nevada 89103

8 Mr. Lewis is expected to testify regarding Defendant's employment and/or
9 unemployment at the time of evidentiary hearing in this matter.

- 10 4. Naomi Flores
11 2060 Desert Shadow Trail
12 Henderson, Nevada 89012
13 (702) 336-6292

14 Ms. Flores is expected to testify regarding the minor child's performance in school and
15 her tutoring of the minor child.

- 16 5. Andrew Lewis
17 4650 Idaho Avenue
18 Las Vegas, Nevada 89104
19 (702) 818-9458

20 Mr. Lewis is expected to testify regarding the Defendant's employment and related
21 issues, including, *inter alia*, the Defendant's expenditures for the minor child.

22 Discovery is ongoing and Defendant reserves the right to amend his witness list.

- 23 6. Brandon Burrows
24 619 Silverpoint Ave.
25 Henderson, Nevada 89123
26 (702) 285-8505

27 Mr. Burrows is expected to testify regarding Defendant's care of the minor child,
28 including activities that the minor child participates during Defendant's timeshare.

7. Kelly Burrows
619 Silverpoint Ave.
Henderson, Nevada 89123
(702) 285-8505

1 Mrs. Burrows is expected to testify regarding Defendant's care of the minor child,
2 including activities that the minor child participates during Defendant's timeshare.

3 DOCUMENTS

- 4 1. Student of the Month Certificate, May 2013;
5 2. May, 2013, Homework Reading Log;
6 3. May, 2013, school calendar;
7 4. Any and all documents provided to Plaintiff in Defendant's Responses to Plaintiff's
8 Request for Production of Documents; and
9 5. Any and all documents relied upon by Plaintiff.

Dated this 14th day of August, 2013.

PATRICIA A. MARR, LTD.

PATRICIA A. MARR, ESQ.

Nevada Bar No. 8846

4305 Dean Martin Dr., Ste. 185

Las Vegas, Nevada 89103

(702) 353-4225 (phone)

(702) 737-1776 (fax)

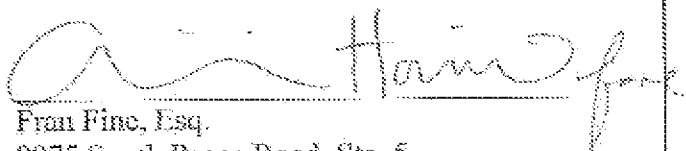
Lvlaw03@yahoo.com

Attorney for Defendant

17 RECEIPT OF COPY

18 RECEIPT OF A COPY of Defendant's Amended Witness List is hereby acknowledged this

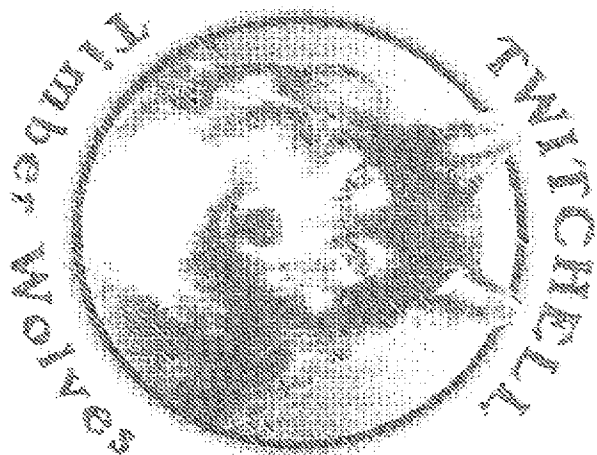
19 14th
20 day of August, 2013.

21 

Fran Fine, Esq.

8975 South Pecos Road, Ste. 5

Henderson, Nevada 89074



Neil C. Twitchell Elementary School

Student of the Month

Congratulations to

Isabella Lewis

for being selected as the
Student of the Month

ms. shover

Teacher

Ms. Michele Woolfbridge, Principal

May 2013

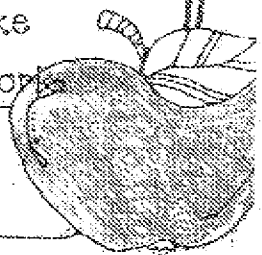
Date

May's Homework Reading Log

Please document reading time below. Remember, readers make the best writers! This is a mandatory portion of daily homework.

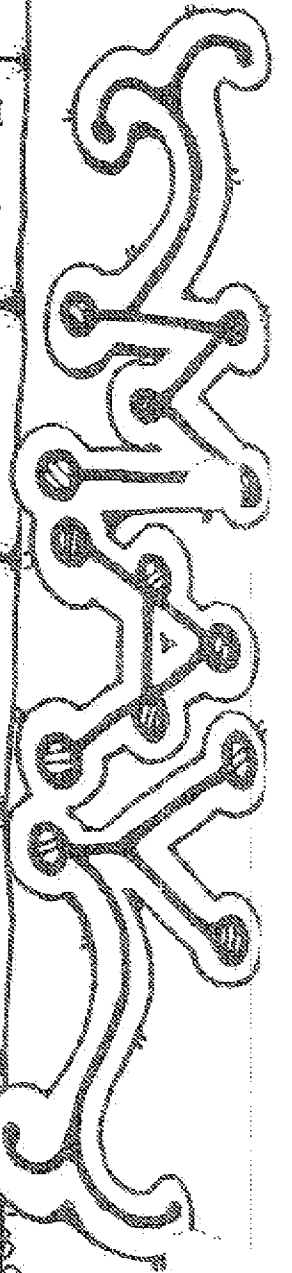
Mrs. Flores

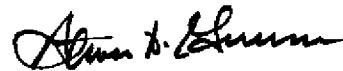
Name: Isabella Lewis



Book Title	Time Read	Date	Listener's signature
Acorn Mother?	25	5/13	(Signature)
String Bean has no wife Barbie & Sisters at the Ball	25	5/2	Maun Pedge
A Vole finds a Home - Seeing the Sights - One Rainy Day	40	5/6	(Signature) (Signature)
Benny Bunn - Ricky and Lucy	30	5/7	(Signature)
Wild Wild Things	30	5/8	(Signature) (Signature)
One Rainy Day	30	5/9	(Signature) (Signature)
One Rainy Day - Ricky & Lucy	30	5/13	(Signature)
Wild Wild Things	30	5/14	(Signature) (Signature)
16 H.P.B.	20	5/15	(Signature) (Signature)
One Rainy Day - Ricky & Lucy	30	5/16	(Signature) (Signature)
Mr. Bad & Mrs. Good	20	5/20	(Signature)
The Turtle and the Bird The Story of the Star	35	5/21	(Signature)
The Story of the Star	30	5/22	(Signature)
The Story of the Star	20	5/23	(Signature)
Key's Best Toy	20	5/28	(Signature)
Jack and the Beanstalk	35	5/29	(Signature)
One Rainy Day - Ricky & Lucy	40	5/30	(Signature) (Signature)

Happy Reading!

[illegible]



CLERK OF THE COURT

NEOJ
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10-427054-D
Plaintiff,)	DEPT. NO. T
)	
vs.)	DATE OF HEARING: 06/04/2013
)	TIME OF HEARING: 9:30 a.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

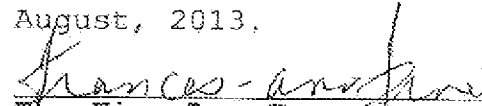
Notice Of Entry Of Consent Order Regarding Issuance of Passport

TO: WESLEY ALLEN LEWIS, Defendant; and

TO: PATRICIA A. MARR, ESQUIRE, Attorney for Defendant:

YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an
Consent Order Regarding Issuance of Passport, a copy of which is
attached hereto, was entered and filed in the above-entitled matter
on the 13th day of August, 2013.

DATED the 21 day of August, 2013,



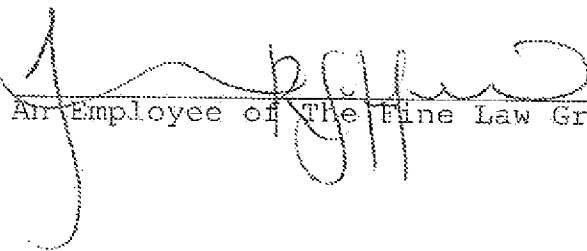
The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 S. Pecos Road, Ste. 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

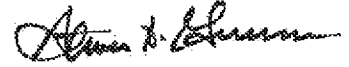
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CERTIFICATE OF MAILING

I hereby certify that on this 22nd day of August, 2013,
a copy of the foregoing Notice Of Entry Of Consent Order Regarding
Issuance of Passport was placed into the United States Mail, first
class postage prepaid at Las Vegas, Nevada, addressed to:

Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Dr., Ste. #185
Las Vegas, Nevada 89103


An Employee of The Fine Law Group


CLERK OF THE COURT

1 ORD
2 The Fine Law Group
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka
10 MARIA DANIELA PERDOMO,

Plaintiff,

vs.

12 WESLEY ALLEN LEWIS,

13 Defendant.

)
)
) 427054
) CASE NO. D-10-427054-D
) DEPT NO. T
)
)
) DATE OF HEARING: 6/4/2013
) TIME OF HEARING: 9:30 a.m.
)
)
)
)

15 CONSENT ORDER REGARDING ISSUANCE OF PASSPORT

16 THIS matter having come before the Court on the 4th day
17 of June, 2013 on Plaintiff's Motion to have Defendant Held in
18 Contempt of Court, To Enforce Decree of Divorce, To Reduce Child
19 Support Arrears to Judgment, and For Award Of Attorney Fees and
20 Defendant's Countermotion For Attorney's Fees and Related Relief.
21 The Plaintiff, MARIA PERDOMO, appeared personally and through her
22 counsel, FRANCES-ANN FINE, ESQUIRE of The Fine Law Group, and
23 Defendant, WESLEY LEWIS, appeared personally and through his
24 counsel, PATRICIA MARR, ESQUIRE; the Court having reviewed all
25 papers and pleadings on file herein and having considered the
26 arguments presented and good cause appearing,

27 / / /

RECEIVED
AUG 02 2013
FAMILY COURT
CLERK OF THE COURT

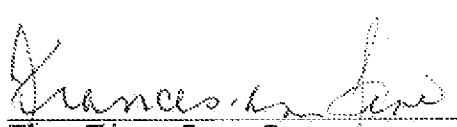
1 IT IS HEREBY ORDERED that the Court hereby authorizes the
2 Plaintiff and mother, MARIA PERDOMO, to obtain a valid passport for
3 issuance for the minor child, herein, to wit: ISABELLA SARA LEWIS,
4 born on the 10th day of August, 2006, as ordered in the Decree of
5 Divorce, Parenting Agreement, filed with this Court previously on
6 the 15th day of July, 2011, allowing the minor child to travel
7 outside of the United States.

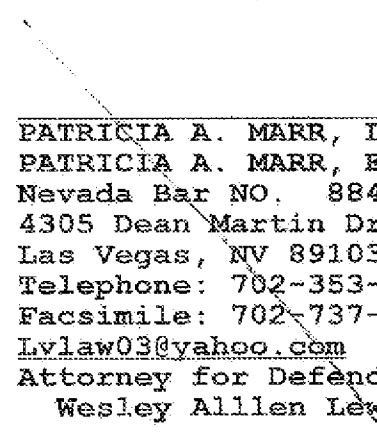
8 DATED this 8 day of August, 2013..

9
10
11 
DISTRICT COURT JUDGE
GAYLE NATHAN

12 SUBMITTED BY:

APPROVED AS TO FORM AND CONTENT:

13 
14 The Fine Law Group
15 FRANCES-ANN FINE, ESQUIRE
16 Nevada Bar No. 0025
17 8975 South Pecos Road
18 Henderson, NV 89074
19 Telephone: 702-384-8900
20 Facsimile: 702-384-6900
21 fran@thefinelawgroup.com
22 Attorneys for Plaintiff
23 MARIA DANIELA PERDOMO fka
24 MARIA DANIELA LEWIS


PATRICIA A. MARR, LTD
PATRICIA A. MARR, ESQUIRE
Nevada Bar NO. 8846
4305 Dean Martin Dr., Suite 184
Las Vegas, NV 89103
Telephone: 702-353-4225
Facsimile: 702-737-1776
Lvlaw03@yahoo.com
Attorney for Defendant
Wesley Alllen Lewis

1 ORD
The Fine Law Group
2 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
3 8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
4 Telephone: 702/384-8900
Facsimile: 702/384-6900
5 fran@thefinelawgroup.com
Attorney for Plaintiff
6 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka)
MARIA DANIELA PERDOMO,)

10 Plaintiff,)

11 vs.)

12 WESLEY ALLEN LEWIS,)

13 Defendant.)
14

427054
) CASE NO. D-10-427043-D

) DEPT NO. T

) DATE OF HEARING: 6/4/2013

) TIME OF HEARING: 9:30 a.m.

15 CONSENT ORDER REGARDING ISSUANCE OF PASSPORT

16 THIS matter having come before the Court on the 4th day
17 of June, 2013 on Plaintiff's Motion to have Defendant Held in
18 Contempt of Court, To Enforce Decree of Divorce, To Reduce Child
19 Support Arrears to Judgment, and For Award Of Attorney Fees and
20 Defendant's Countermotion For Attorney's Fees and Related Relief.
21 The Plaintiff, MARIA PERDOMO, appeared personally and through her
22 counsel, FRANCES-ANN FINE, ESQUIRE of The Fine Law Group, and
23 Defendant, WESLEY LEWIS, appeared personally and through his
24 counsel, PATRICIA MARR, ESQUIRE; the Court having reviewed all
25 papers and pleadings on file herein and having considered the
26 arguments presented and good cause appearing,

27 / / /
28

RECEIVED

AUG 02 2013

FAMILY COURT
DEPARTMENT T

FDP

PATRICIA A. MARR, ESQ.

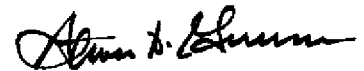
Nevada Bar No. 008846

4305 Dean Martin Dr., Ste. 185

Las Vegas, Nevada 8910

(702) 353-4225

Attorney for



CLERK OF THE COURT

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS

Plaintiff,

vs.

WESLEY ALLEN LEWIS

Defendant.

) Case No.

D-10-427043-D

)

) Dept. No.

T

)

)

)

)

GENERAL FINANCIAL DISCLOSURE FORM

The judge uses this form to understand the financial position of the Plaintiff and the Defendant. You must fill this form out completely and truthfully.

A. Personal Information:

1. What is your full name? (first, middle, last)
2. How old are you?
3. What is your date of birth?
4. What is your occupation?
5. What is your highest level of education?

Wesley Allen Lewis

36

7-23-1977

Sales

HS. Diploma

B. Employment Information: (☒ check one)

1. Are you currently employed?

☒

If yes, what is the name of your employer?

M.R.G.

What date were you hired on? (mm/dd/yy)

10-20-2012

2. Are you disabled? (☒ check one)

If yes, what is the level of your disability?

n/a

What agency certified you disabled?

n/a

What is the nature of your disability?

n/a

C. Attorney Information: Complete the following sentences:

1. An Attorney (has/has not) _____ has _____ been retained on my behalf for this case.
2. As of today, the attorney has been paid a total of 1200 on my behalf.
3. I have a credit with my attorney in the amount of 0.
4. I currently owe my attorney a total of 300.
5. I owe my prior attorney a total of 0.

Revised 2/26/13

Section 1: Personal Income

Before you can complete the next section you need to figure out your pay frequency.
Your pay frequency is determined by the number of time you are paid each month.

Pay Frequency Table

1.00 = Paid one time per month

2.00 = Paid two times per month

2.17 = Paid every two weeks

4.33 = Paid every week

A. Fill in the line that applies to you. Only complete line 1 OR line 2.

Line #	Income Question	Amount Earned	Number of Hours Worked per Pay Period	Pay Frequency (1.00, 2.00, 2.17, or 4.33)	Monthly Income
1	I am paid a hourly wage in the amount of	9\$ HR. VS. 6% cost	x	x	= \$0.00
2	I am paid a base salary in the amount of		x		\$0.00 \$900.31 = \$0.00

B. Fill in the amount of money you receive each month for the following types of income:

Line #	Income Question	Amount Received Monthly
3	I regularly work overtime and each month earn an average of	
4	I receive bonuses, commissions, or tips in the amount of	
5	I receive a car, gas, housing, or other allowance in the amount of	
6	I receive spousal support in the amount of	
7	I receive social security in the amount of	
8	I receive social security disability in the amount of	
9	I receive workman's compensation benefits in the amount of	
10	I receive unemployment benefits in the amount of	
11	I receive pension or retirement income in the amount of	
12	I receive net rental income in the amount of	
13	I receive income from other sources in the amount of	
14	Total Income Received (add lines 3-13)	\$0.00

C. Total monthly income from all sources:

Line #		
15	Total from Line 1 OR 2	\$0.00
16	Total from Line 14	\$0.00
17	Total Gross Monthly Income (Add lines 15-16)	\$0.00 900.31

	Child's Name:	Child's Date of Birth	Whom is child living with? (Mom, Dad, or Both)	Is this child from this marriage / relationship? (Yes or No)
1st	Isabella Lewis	8-10-2006	Both	yes
2nd				
3rd				
4th				
5th				

B. Fill in the table below with the amount of money you spend each month on the following expenses for the children:

	Children's Expenses	1st Child	2nd Child	3rd Child	4th Child	5th Child
1	Clothes, Shoes and Accessories	30				
2	Unreimbursed Medical Expenses					
3	Telephone and Internet	30				
4	Entertainment	80				
5	Food	160				
6	Insurance (other than health)					
7	Education Related Expenses	40				
8	Summer Camp/Programs					
9	Vehicle					
10	Transportation Cost for Visitation	200				
11	Total Monthly Expenses for Children (add lines 1-11)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		\$540.00				

Section 5: Household Information

A. I live with (number) 1 other adults, including children over the age of eighteen, who contribute to or pay the household expenses in the amount of \$ _____.

Section 6: Personal Expenses

Fill in the table with the amount of money you spend each month on the following expenses and check whether you pay the expense for you, for the other party, or for both of you.

Expense	Monthly Amount of Expense	For Me	For the Other Party	For Both
Home				
Mortgage/Rent/Lease	300			
Property Taxes				
HOA				
Home Owner's Insurance				
Lawn Care				
Pest Control				
Pool Service				
Security				
Other				
Utilities				
Water				
Electric				
Gas				
Sewer				
Home Phone				
Internet/Cable				
Other				
Medical				
Health Insurance				
Unreimbursed Medical Expenses				
Other	150			
Transportation				
Car Loan/Lease Payment				
Fuel	300			
Auto Insurance	120			
Other	20			
Personal				
Food (groceries and restaurants)	160			
Pets				
Cell phone	80			
Membership fees				
Clothing, Shoes, etc.	100			
Dry Cleaning				
Other	80			
Debts				
Credit Card Payments				
Child Support	31.70			
Alimony/Spousal Support				
Student Loans				
Other				
Total Monthly Expenses	90.00	1,341.70		

Section 2: Personal Deductions

A. Fill in the amount of money that is taken out of every paycheck for each of the following deductions:

Line #	Name of Deduction	Amount Deducted
18	Court Ordered Child Support is deducted from every paycheck in the amount of	15.85
19	Federal Income Tax is deducted from every paycheck in the amount of	
20	Social Security Tax is deducted from every paycheck in the amount of	
21	Medicare is deducted from every paycheck in the amount of	
22	Union Dues are deducted from every paycheck in the amount of	
23	Health Insurance Cost is deducted from every paycheck in the amount of	
24	Life, Disability, or Other Insurance Premiums are deducted from every paycheck in the amount of	
25	Federal Health Savings Plan contribution is deducted from every paycheck in the amount of	
26	Retirement, Pension, IRA, or 401(k) contributions are deducted from every paycheck in the amount of	
27	Savings are deducted from every paycheck in the amount of	
28		
29		
30	Total Paycheck Deductions	\$0.00
31	Total Monthly Deductions	\$0.00

Section 3: Income Summary

Line #		
32	Total from Line 17	\$0.00
33	Total from Line 30	\$0.00
	Net Monthly Income	\$0.00

Section 4: Child Information

A. Fill in the table below with the name and date of birth of each of your children, parent the child is living with, and whether the child is from this marriage or relationship:


Section 7: Asset and debt Chart

Complete the chart below by listed all assets and debts, the value of each, the amount owed on each, and whose name the asset or debt is under (You, the Other Party, or Both).

Line #	Description of Asset or Debt	Gross Value	Amount Owed	Net Value	Whose Name is on the Account? (Me, the Other Party or Both)
1				\$0.00	
2				\$0.00	
3				\$0.00	
4				\$0.00	
5				\$0.00	
6				\$0.00	
7				\$0.00	
8				\$0.00	
9				\$0.00	
10				\$0.00	
11				\$0.00	
12				\$0.00	
13				\$0.00	
14				\$0.00	
15				\$0.00	
16				\$0.00	
17				\$0.00	
18				\$0.00	
19				\$0.00	
20				\$0.00	
Total Value of Assets (add lines 1-20)		\$0.00	\$0.00	\$0.00	

IMPORTANT: Read the following paragraph carefully.

I am the (☒ check one) ☐ Plaintiff / ☐ Defendant in the above action. I swear or affirm under penalty of perjury that I have read and followed all instructions in completing this Financial Disclosure Form. I understand that, by my signature, I guarantee the truthfulness of the information on this Form. I also understand that if I knowingly make false statements I may be subject to punishment, including contempt of court.


Your Signature

8-22-2013
Date

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2013, service of the **FINANCIAL DISCLOSURE FORM** was made to the following interested parties in the manner set forth below:



Via 1st Class U.S. Mail, postage fully prepaid, to

FRAN FINE, ESQ.
8975 S. PEACOCK RD, STE 5
HENDERSON, NV 89074



Via Facsimile and/or Email pursuant to the Consent to Service By Electronic Means on file herein to:



And, via 1st Class U.S. Mail, postage full prepaid, addressed to:

Plaintiff

Respectfully Submitted,

(Signature)

(Printed) Patricia A. Marr, Esq.



WESLEY LEWIS
4650 IDAHO AVE
LAS VEGAS NV 89104

Other Benefits and Information	this period	total to date
May RI	9.34	
Sales	9,884.00	175,455.00
Personal Sales		6,884.00
Variation Sal.		19.80

Your federal taxable wages this period are \$411.34

Advice number: 00000330300
Pay date: 05/09/2013

Account Number	Invoice	ABA	amount
xxxxxxx0251	xxxx	xxxx	\$364.49

NON-NEGOTIABLE

CU FRT CMT CLKR VCHR AC LTR
WZ2 016257 054130 0000130300

MarshallRetailGroup

THE MARSHALL RETAIL GROUP, LLC
5385 WYNN ROAD
LAS VEGAS, NV 89118

Earnings Statement



Period Ending: 07/26/2013
Pay Date: 08/02/2013

Taxable Marital Status: Single
Exemptions/Dependents: 3
Federal: 3
NY: No State Income Tax

WESLEY LEWIS
4550 IDAHO AVE
LAS VEGAS NV 89104

Social Security Number: XXX-XX-7589

Earnings	rate	hours	this period	year to date
Regular	9.0000	43.75	437.75	7,289.63
Overtime				29.70
Commission				3,069.30
Gross Pay			5447.75	10,368.63

Other Benefits and Information	this period	total to date
Hry Rt	9.00	
Sales	6,529.00	168,586.00
Personal Sales		6,529.00
Vestition Bal.		18.9

Deductions	Statutory	Other
Social Security Tax	-27.77	
Medicare Tax	-6.49	
Federal Income Tax		
Child Support		-15.56
Direct Deposit		-297.54
Net Pay		5097.54

Your federal taxable wages this period are \$447.75

MarshallRetailGroup

THE MARSHALL RETAIL GROUP, LLC
5385 WYNN ROAD
LAS VEGAS, NV 89118

Advice number: 90000310360
Pay date: 08/02/2013

Deposited to the account of	account number	branch ASA	amount
WESLEY LEWIS	XXXXXX9251	XXXX XXXX	\$5097.54

NON-NEGOTIABLE

DP 0101 0001 01001 0010 00 00
WYJ 010007 000100 000000000 1

MarshallRetailGroup

THE MARSHALL RETAIL GROUP, LLC
5385 WYNN ROAD
LAS VEGAS, NV 89118

Earnings Statement



Period Ending: 07/14/2013
Pay Date: 07/19/2013

Taxable Marital Status Single
Exemptions/Allowances
Federal 5
NV No State Income Tax

WESLEY LEWIS
4659 IDAHO AVE
LAS VEGAS NV 89124

Social Security Number XXX-XX-7000

Earnings	rate	hours	this period	year to date
Regular	9.0000	43.00	387.00	6,861.00
Overtime				23.70
Commission				3,069.30
Gross Pay			3,187.00	9,950.60

Other Benefits and Information	this period	total to date
Hry Rt	0.00	
Sales	4,731.00	162,057.00
Personal Sales		4,731.00
Vacation Bal.		17.90

Deductions	Statutory	Other
Social Security Tax	-23.99	
Medicare Tax	-5.81	
Federal Income Tax		
Other		
Child Support	-10.85	
Direct Deposit	-341.55	
Net Pay		80.60

Your federal taxable wages this period are \$387.00

MarshallRetailGroup

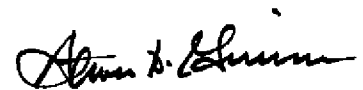
THE MARSHALL RETAIL GROUP, LLC
5385 WYNN ROAD
LAS VEGAS NV 89118

Advice number: 00000200000
Pay date: 07/19/2013

Deposited to the account of
WESLEY LEWIS

Account number: XXXXXX02001
Branch: XXXX
Amount: \$341.55

NON-NEGOTIABLE



CLERK OF THE COURT

PATRICIA A. MARR, LTD.
PATRICIA A. MARR, ESQ.
Nevada Bar No. 8846
4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103
(702) 353-4225 (phone)
(702) 737-1776 (fax)
Lvlaw03@yahoo.com
Attorney for Defendant
WESLEY ALLEN LEWIS

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS aka)	
MARIA DANIELA PERDOMO,)	Case No. D-10-427054
)	Dept No. I
Plaintiff,)	
)	
v.)	
)	
WESLEY ALLEN LEWIS,)	<u>DEFENDANT'S PRE-TRIAL</u>
)	<u>MEMORANDUM</u>
Defendant.)	

COMES NOW, Defendant, WESLEY ALLEN LEWIS, by and through his counsel,
PATRICIA A. MARR, ESQ. of PATRICIA A. MARR, LTD., and files his Pre Trial Memorandum
as follows.

I.

STATEMENT OF ESSENTIAL FACTS

A. Names and ages of the parties:

Plaintiff: MARIA DANIELA LEWIS, age 34.

Defendant: WESLEY ALLEN LEWIS, age 36.

1. B. Date of divorce: July 15, 2011.

2. C. Resolved issues, including agreed resolution:

3. None.

4. D. Statement of facts and issues:

5. 1. Plaintiff's assertion that Defendant should be held in contempt of Court for his
6. alleged failure to pay ordered child support;

7. 2. Plaintiff's request for a judgment for child support arrears;

8. 3. The imposition of a monthly payment for child support arrears;

9. 4. A current child support obligation; and

10. 5. Attorney's fees.

11.
12. The parties in this action, Plaintiff, Maria Daniela Lewis ("Maria") and Defendant,
13. Wesley Allen Lewis ("Wesley"), were divorced by Decree of Divorce on July 15, 2011. There is
14. one minor child born the issue of the parties' marriage, to-wit: Isabella Sara Lewis, DOB: August
15. 10, 2006.

16.
17. The Decree of Divorce provides that the parties share joint legal and physical custody of the
18. minor child. Decree, p. 3, ll. 23-27; Decree, p. 4, 1-6.

19. The Decree further provides that Wesley pay to Maria the sum of \$307 per month as and for
20. child support. The amount of child support was adjusted to include an offset of \$133 per month for
21. the cost of the minor child's health insurance.

22.
23. At the time the Decree was entered Wesley was employed at Gregory's Shoes and had
24. health care coverage for the minor child. Wesley also was living on his own and barely making
25. surviving financially. In or about September, 2011, Wesley obtained personal leave from work,
26. because of the impact and toll from the divorce. Specifically, Maria would not inform Wesley
27. where she and the minor child were residing and would often drop the minor child off at work
28.

1 while Wesley was working. Upon his return to work, Gregory's Shoes location closed - in or about
2 October, 2011, which rendered Wesley unemployed. Nonetheless, Wesley had health insurance for
3 the minor child up to and including October, 2011.
4

5 Thereafter, Wesley learned that he could modify his child support obligation based upon his
6 changed financial circumstances, specifically, his loss of employment. In August, 2012, Wesley
7 sought to have his child support obligation modified in August, 2012. Thereafter, the Nevada
8 Division of Welfare and Support (the "Division") informed Wesley on two (2) occasions that they
9 had "lost his paperwork" and requested that he resubmit the paperwork. Upon Wesley's
10 resubmission of the paperwork the Division expedited his hearing date.
11
12

13 Wesley sought employment but was unable to find unemployment until October, 2012.

14 In or about November, 2012, the Division initiated a wage garnishment against Wesley's
15 wages.
16

17 Wesley finally received a court date to modify his child support, which was held on
18 February 5, 2013. At the hearing the Hearing Master for the Nevada Division of Welfare and
19 Support Services modified Wesley's child support obligation based upon her review of Wesley's
20 payroll records. In fact, the evidence presented at the hearing, including, *inter alia*, the testimony
21 of the parties, revealed that Maria's gross monthly income is more than Wesley's. Moreover, at the
22 hearing Maria represented that she has health insurance benefits for the minor child through her
23 employer, while Wesley does not.¹ In accordance with the same, the Hearing Master ordered
24 Wesley to provide health insurance for the minor child, *if available* through his employer. Notably,
25
26

27
28

¹ The Hearing Master's Order was based upon Maria's representation that she receives insurance for the minor child through her employer while Wesley does not.

1 the Decree also provides that Wesley shall only provide medical and dental insurance for the minor
2 child "if available through his employer." Decree, p. 4, ll. 24-26. Finally, the Hearing Master
3 reduced Wesley's child support arrears to judgment. The arrears were based upon the District
4 Attorney's Office accounting.² Maria's assertion that Wesley was "somehow able to convince the
5 District Attorney that he had ...paid child support in the amount of \$ 2,391.00" and that the Court
6 based its decision without the provision of any evidence is nonsensical in light of the facts. Both
7 parties testified regarding their income and the Court relied upon the accounting from the District
8 Attorney.
9

10
11 **1. WESLEY'S CONDUCT WAS NOT, AND IS NOT, CONTEMPTUOUS.**
12

13 A civil contempt sanction is designed to coerce the contemnor into complying with a court
14 order and thus, must be conditional or indeterminate, ending if the contemnor complies. *Warner v.*
15 *Second Judicial Dist. Court*, 111 Nev. 1379, 906, P.2d 707 (1995), cited, *In re Determination of*
16 *Relative Rights of Claimants & Appropriators of Waters of Humboldt River Stream Sys.*, 118 Nev.
17 901, 909, 59 P.3d 1226 (2002), *see also* *Gottwals v. Manske*, 60 Nev. 76, 81, 99 P.2d 645 (1940),
18 *Rodriguez v. Eighth Judicial Dist. Court*, 120 Nev. 798, 804, 102 P.3d 41 (2004).
19

20 As in *Rodriguez*, the contempt order issued in this case was civil. Specifically, the Court
21 issued an order to show cause as to why Wesley should not be held in contempt for his failure to
22 make full child support payments. However, Wesley was unemployed until from approximately
23 October, 2011, until November, 2012, and unable to make full child support payments. Moreover,
24 as soon as Wesley learned that he could modify his child support payment based upon his loss of
25 income, he sought to do so and applied for a modification through the Nevada Division of Welfare
26

27
28 ² Based upon the difference in income between the parties Maria should have been ordered to pay the
difference of \$45.26 per month to Wesley, or at a minimum, Wesley should have received a credit each month in this
amount toward his arrears.

1 and Support Services. In fact, Wesley was simply unable to comply with the child support order
2 because he did not, and does not have the financial ability to do so.

3 Notably, a party's inability to comply with a judicial order constitutes a defense to a
4 charge of civil contempt. *F.T.C. v. Affordable Media*, 179 F.3d 1228 (1999). See also, *Bland v.*
5 *Bland*, 2008, 238 P.3d 796, 124 Nev. 1453, 2008 WL 6099075, *Unreported*. (Order finding
6 former husband in civil contempt for failing to pay entirety of his \$4,000 per month support
7 obligation to former wife during certain period and ordering him to pay former wife \$5,000
8 in attorney fees was not supported by findings indicating whether or on what basis court
9 determined that former husband had ability to pay entirety of obligation during specified
10 period, or that he willfully failed to do so, thus warranting reversal of contempt order).

11 In this case, Wesley was and is, unable to pay the entirety of his child support
12 obligation. As a matter of law, Wesley's inability to comply with the order constitutes a
13 legal defense against any allegation of contempt. Accordingly, Maria's request to hold him
14 in contempt should be denied. In fact, Maria's Motion should be denied in its entirety.

15 II.

16 CHILD CUSTODY/CHILD SUPPORT

17 There is one (1) minor child born the issue of this marriage, to wit – ISABELLA SARA
18 LEWIS DOB: August 10, 2006.

1 III.

2 CHILD SUPPORT

3 The parties share joint physical custody of the minor child. Pursuant to *Wright v. Osburn*,³
4 Maria's monthly child support obligation to Wesley should be \$92.85. Specifically, Maria's
5 Financial Disclosure Form states that her gross monthly income is \$1,416.84, and Wesley's gross
6 monthly is \$900.31. Thus, $\$1,416.84 \times 18\%$ is \$254.91 and $\$900.31 \times 18\%$ is \$92.85.

7 Maria is seeking an order that Wesley assist her with one-half of the expenses associated
8 with the minor child extra-curricular activities, however, there is no such authority to support such
9 a claim.

10 IV.

11 SPOUSAL SUPPORT

12 N/A

13 V.

14 PROPERTY AND DEBTS

15 N/A

16 VI.

17 ATTORNEY'S FEES

18 Defendant is requesting his attorney's fees and costs incurred in the amount of \$2,500.
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³ 114 Nev. 1367, 970 P.2d 1071 (1998).

VII.

LIST OF WITNESSES

1. Wesley Allen Lewis
c/o Patricia A. Marr, Esq.
4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103

Mr. Lewis will testify regarding all issues at the time of evidentiary hearing in this matter.

2. Maria Lewis aka Maria Perdomo
c/o Frances Fine, Esq.
8975 South Pecos Road, Ste. 5
Henderson, Nevada 89074

Ms. Perdomo is expected to testify regarding all issues at the time of evidentiary hearing in this matter.

3. Sid Lewis
c/o Patricia A. Marr, Esq.
4305n Martin Dr., Ste. 185
Las Vegas, Nevada 89103

Mr. Lewis is expected to testify regarding Defendant's employment and/or unemployment at the time of evidentiary hearing in this matter.

4. Naomi Flores
2060 Desert Shadow Trail
Henderson, Nevada 89012
(702) 336-6292

Ms. Flores is expected to testify regarding the minor child's performance in school and her tutoring of the minor child.

5. Andrew Lewis
4650 Idaho Avenue
Las Vegas, Nevada 89104
(702) 818-9458

Mr. Lewis is expected to testify regarding the Defendant's employment and related issues, including, *inter alia*, the Defendant's expenditures for the minor child.

1 Discovery is ongoing and Defendant reserves the right to amend his witness list.

2 6. Brandon Burrows
3 619 Silverpoint Ave.
4 Henderson, Nevada 89123
(702) 285-8505

5 Mr. Burrows is expected to testify regarding Defendant's care of the minor child,
6 including activities that the minor child participates during Defendant's timeshare.

7 7. Kelly Burrows
8 619 Silverpoint Ave.
9 Henderson, Nevada 89123
(702) 285-8505

10 Mrs. Burrows is expected to testify regarding Defendant's care of the minor child,
11 including activities that the minor child participates during Defendant's timeshare.

12 VIII.

13 LIST OF EXHIBITS

- 14
- 15 a. Both parties' Financial Disclosure Forms on file herein;
 - 16 b. Defendant's W-2 forms, tax returns, earnings summary, and pay statements;
 - 17 c. March 7, 2012, letter from Dept. of Treasury;
 - 18 d. Documentation, including receipts regarding expenses paid on of and for minor
 - 19 child as exhibit C to Defendant's discovery responses and supplements;
 - 20 e. Documentation from United Healthcare/2011 Statement;
 - 21 f. Defendant's bank account statements provided in Defendant's discovery responses
 - 22 and supplements;
 - 23 g. July 9, 2013, letter/confirmation of personal loan by Sid and Olga Lewis;
 - 24 h. Documentation for attorney's fees paid by Defendant;
 - 25 i. Mini storage receipts;
 - 26 j. Receipts for medication;
 - 27 k. September 5, 2011, statement from Dept. of Employment, Training and
 - 28 Rehabilitation;
 - l. Accounting from Clark County District Attorney's Office re: child support;
 - m. February 27, 2013, Master's Recommendation;
 - n. NCP Financial Transaction History;
 - o. IRS rejection re: Plaintiff's failure to comply with the Court's order re: claiming the
 - p. Any and all documentation provided by Plaintiff.

IX.

UNUSUAL LEGAL OR FACTUAL ISSUES

None.

X.

LENGTH OF TRIAL

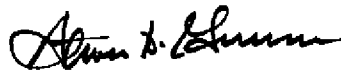
The anticipated length of this trial will be three (3) hours.

Dated this 22nd day of August, 2013.

PATRICIA A. MARR, LTD.

/s/Patricia A. Marr, Esq.

PATRICIA A. MARR, ESQ.
4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103
(702) 353-4225 (phone)
(702) 737-1776 (fax)
Lvlaw03@yahoo.com



CLERK OF THE COURT

MEMO
The Fine Law Group
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
8975 South Pecos Road Ste. 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO: D-10-427054-D
Plaintiff)	DEPT NO: T
v.)	
)	DATE OF HEARING: 8-29-13
WESLEY ALLEN LEWIS,)	TIME OF HEARING: 1:30 p.m.
)	
Defendant.)	

Plaintiff's Pre-Evidentiary Hearing Brief

COMES NOW Plaintiff, MARIA DANIELA PERDOMO, formerly known as MARIA DANIELA LEWIS, by and through her attorney, FRANCES-ANN FINE, ESQ., of The Fine Law Group, pursuant to the Court's Order Setting Evidentiary Hearing filed June 7, 2013, and submits Plaintiff's Pre-Evidentiary Hearing Brief:

POINTS AND AUTHORITIES

I. INTRODUCTION

Plaintiff (hereafter "MARIA") and Defendant (hereafter "WESLEY") were formerly married to one another and are the parents of one minor child, to-wit: ISABELLA SARA LEWIS (hereafter

1 "ISABELLA"), born August 10, 2006. At a Case Management Conference
2 conducted on May 26, 2011 a divorce was granted pursuant to certain
3 terms stipulated to by the parties and additional terms decided by
4 the Court. The parties' Decree Of Divorce was thereafter filed on
5 July 15, 2011.

6 The Decree Of Divorce set forth the parties' agreement
7 that they share joint legal custody and joint physical custody of
8 ISABELLA. It imposed a child support obligation upon WESLEY
9 effective June 2011. WESLEY's child support obligation of \$440.00
10 per month was reduced by \$133.00 (one-half of the amount he
11 represented to be the cost of health insurance he was maintaining
12 to cover ISABELLA), resulting in a payment of \$307.00.

13 Due to the fact that WESLEY did not voluntarily pay his
14 child support obligation to MARIA, she sought the intervention of
15 the Family Support Division of the Clark County District Attorney.
16 A hearing was conducted in Case No. R11161532R before the Child
17 Support Master on February 5, 2013. Based upon WESLEY's
18 representations, it was recommended by the Master that WESLEY's
19 current child support obligation be terminated. Assuming a
20 previous child support obligation of \$307.00 per month, the Master
21 found total arrearages through September 30, 2012 (including
22 arrearages plus interest plus penalty) of \$3,020.17 and further
23 recommended that WESLEY be ordered to pay \$30.00 per month towards
24 said arrears.

25 On May 2, 2013 MARIA filed Plaintiff's Motion To Have
26 Defendant Held In Contempt Of Court, To Enforce Decree of Divorce,
27 To Reduce Child Support Arrears To Judgment, And For Award Of
28 Attorney Fees. WESLEY filed an opposition to MARIA's motion and a

1 countermotion seeking "attorney's fees and related relief".

2 The hearing on MARIA's motion and WESLEY's countermotion
3 was conducted by this Court on June 4, 2013. At that time the
4 child support arrears judgment rendered in Case No. R-11-161532-R
5 was set aside "on the basis of that court's mistake as to the
6 amount of Defendant's monthly child support obligation" and the
7 Family Support Division was ordered to conduct a new audit. The
8 Court also granted MARIA's request for an Order To Show Cause as to
9 WESLEY's failure to pay the child support ordered in the Decree.

10 The Court at the June 4, 2013 hearing ruled that WESLEY's
11 child support obligation was in the amount of \$440.00 per month
12 unless that month he maintained health insurance to cover ISABELLA,
13 and in any such month his obligation would be reduced by one-half
14 of the cost of maintaining said insurance. The Court further set
15 an evidentiary hearing to be conducted on August 29, 2013. Its
16 Order filed on July 15, 2013 identified the "issues to be
17 considered at that Evidentiary Hearing" as follows:

18 (1) The Order To Show Cause why Defendant should not be
19 held in contempt of court for his failure to pay ordered
child support;

20 (2) Plaintiff's request for a judgment for child support
21 arrears;

22 (3) The imposition of a monthly payment on child support
arrears;

23 (4) A current child support obligation/sharing of minor
24 child's expenses; and

25 (5) A determination as and for attorney's fees.

26 All other issues raised by MARIA's motion and WESLEY's
27 countermotion were resolved by the Court at the June 4, 2013
28 hearing. None of those issues, including a requested modification

1 of custody, are before the Court at the scheduled August 29, 2013
2 Evidentiary Hearing.

3 II. ANTICIPATED EVIDENCE

4 A. Wesley's Failure To Fulfill His Child Support Obligation

5 The evidence will show that at no time since the current
6 child support obligation was imposed upon WESLEY, effective June
7 2011, has he voluntarily paid child support to MARIA. The only
8 child support MARIA has received has been through the efforts of
9 the Family Support Division of the Clark County District Attorney
10 by attaching WESLEY's income tax refund and by garnishing his
11 wages.

12 As ordered by this Court, the Family Support Division is
13 performing a new audit to be available to the Court and counsel
14 prior to August 29, 2013. It is anticipated that this new audit
15 will accurately set forth WESLEY's total child support arrears
16 based upon a correct interpretation of the Court's orders and an
17 understanding of the facts.

18 The evidence to be adduced will show that from June 2011
19 through September 2011 WESLEY maintained health insurance to cover
20 ISABELLA at a rate of \$207.00 per month. For those four months,
21 one-half of that amount (\$103.50) should be credited against
22 WESLEY's \$440.00 per month obligation, resulting in a total payment
23 each month of \$336.50. That insurance was terminated on October 1,
24 2011. Thus, from October 2011 forward WESLEY's child support
25 obligation was the full \$440.00 per month.

26 WESLEY's excuse for his failure to comply with the
27 Decree's child support obligation is his alleged period of
28 unemployment. Yet, the evidence will show that even while employed

1 at the same job as he had when the Decree was entered he failed to
2 pay any child support. When WESLEY's income was allegedly reduced,
3 he failed to voluntarily pay even a smaller amount. In other
4 words, WESLEY made no effort to comply with the Court's child
5 support order.

6 **B. Wesley's History Of Deception As To His Income**

7 The evidence will show that on May 25, 2011 WESLEY filed
8 a Financial Disclosure Form that represented that he was currently
9 employed by "Gregory's" (and had been so employed since December
10 2010). The Financial Disclosure Form also represented that WESLEY's
11 gross monthly income was \$3,910.00. The Case Management Conference
12 was conducted just **one day later**. As the Minutes reflect, after
13 the Court calculated WESLEY's child support obligation to be
14 \$440.00 per month the following took place:

15 "...Attorney Buche [WESLEY'S then-counsel] addressed the
16 court and advised that just before Court, the father
17 advised him he now has a new job and is making about
\$1200 less a month than he was previously. COURT stated
it BINDS Defendant to the FDF he signed on 5/24/11..."

18 The evidence to be adduced will demonstrate the Court's
19 wisdom in rejecting WESLEY's last minute representation of a "new
20 job" with less income. In WESLEY's answers to interrogatories
21 propounded to him in connection with the upcoming Evidentiary
22 Hearing, when asked to list each employer he has had from January
23 1, 2011 forward and the date of each such employment, WESLEY
24 answered that he was employed by "Gregorys" from "11/30/2010-
25 10/1/2011." There obviously was no "new job" in May of 2011, and
26 WESLEY lied to this Court in an attempt to reduce his child support
27 obligation.

28 / / /

1 C. Isabella's Expenses And Wesley's Refusal To Assist With Same

2 The evidence to be adduced at trial will also provide
3 documentation regarding necessary expenses for ISABELLA, including
4 for extracurricular activities and tutoring that MARIA has paid
5 virtually alone since WESLEY has been much more interested in
6 buying possessions for himself than "investing" in his daughter.
7 Evidence will establish that ISABELLA's tutoring should continue
8 (she will be repeating first grade). MARIA will be seeking an
9 order that WESLEY be required to share equally in expenses for
10 ISABELLA's benefit.

11 D. Maria's Attorney Fees And Costs

12 As this Court's order indicates, the parties' respective
13 requests for attorney fees and costs are among the issues to be
14 considered at the Evidentiary Hearing. The evidence will include
15 an invoice from MARIA's counsel setting forth the attorney fees and
16 costs she has incurred.

17 III. WITNESSES

18 MARIA's counsel intends to call both parties as witnesses
19 at the Evidentiary Hearing.

20 On August 14, 2013 (the Discovery Deadline) WESLEY's
21 counsel served upon MARIA's counsel Defendant's Amended Witness
22 List And Document Disclosure. Potential witnesses disclosed for
23 the first time were BRANDON BURROWS and KELLY BURROWS, and both are
24 described as being expected to testify "regarding Defendant's care
25 of the minor child, including activities that the minor child
26 participates during Defendant's timeshare". The initial disclosure
27 of these two witnesses was made two months after the June 14, 2013
28 exchange of Witness Lists mandated by this Court. Moreover, by the

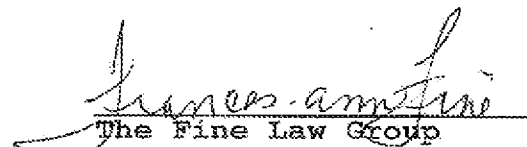
1 disclosure taking place on the Discovery Deadline, MARIA was
2 prevented from conducting any discovery regarding these potential
3 witnesses. Finally, the description of their anticipated testimony
4 does not appear that it has relevance to the limited issues before
5 the Court at the Evidentiary Hearing. For these reasons, MARIA
6 objects to their testimony.

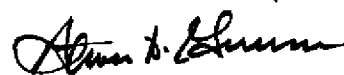
7 IV. EXHIBITS

8 MARIA's counsel intends to offer the following as
9 exhibits at the evidentiary hearing:

- 10 1. WESLEY's Financial Disclosure Form filed May 25,
11 2011
- 12 2. Court Minutes of May 26, 2011
- 13 3. WESLEY's Financial Disclosure Form filed May 29,
14 2013
- 15 4. WESLEY's answers to interrogatories
- 16 5. United Healthcare Coverage Certificate
- 17 6. MARIA's Financial Disclosure Form filed May 8, 2013
- 18 7. Gymnastics documents, bates stamped P0002 - P0003
- 19 8. Receipts, bates stamped P0041 - P0094
- 20 9. ISABELLA's phone documents, bates stamped P0120 -
21 P0122
- 22 10. Summer camp documents, bates stamped P0123 - P0125
- 23 11. AIMSweb documents, bates stamped P0005 - P0007 and
24 P0038 - P0040
- 25 12. Individual Student Report, bates stamped P0008 -
26 P0011
- 27 13. Star Reading Parent Report, bates stamped P0034 -
28 P0037

1 14. October 16, 2012 Student Progress Report, bate
2 stamped P0100
3 15. First trimester Student Progress Report, bate
4 stamped P0101 - P0109
5 16. Second trimester Student Progress Report, bate
6 stamped P0110 - P0118
7 17. May 16, 2013 Student Progress Report, bate stamped
8 P0019
9 18. March 22, 2013 Light's Retention Scale, bate stamped
10 P0018 - P0023
11 19. April 16, 2013 Light's Retention Scale, bate stamped
12 P0024 - P0029
13 20. Student Intervention/Retention Checklist, bate
14 stamped P0099
15 21. Report Card, bate stamped P0095 - P0098
16 22. Note from Ms. Flores, bate stamped P0031 - P0032
17 23. Kumon documents, bate stamped P0012 - P0017
18 24. Family Support Division child support audit
19 25. Fine Law Group invoice
20 DATED this 22nd day of August, 2013.

21
22
23 
24 The Fine Law Group
25 FRANCES-ANN FINE, ESQ.
26 Nevada Bar No. 0025
27 Attorney for Plaintiff
28 MARIA DANIELA PERDOMO



CLERK OF THE COURT

1 ROC
2 THE FINE LAW GROUP
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 Attorney for Plaintiff
10 MARIA DANIELA LEWIS nka
11 MARIA DANIELA PERDOMO


DISTRICT COURT

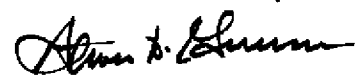
CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka)
10 MARIA DANIELA PERDOMO,)
11 Plaintiff,) CASE NO. D-10-427054-D
12 vs.) DEPT. NO. T
13 WESLEY ALLEN LEWIS,) DATE OF HEARING: 8-29-13
14 Defendant.) TIME OF HEARING: 1:30 p.m.

RECEIPT OF COPY

15 On this 22 day of August, 2013, copies of PLAINTIFF'S
16 PRE-EVIDENTIARY HEARING BRIEF and PLAINTIFF'S EXHIBITS were
17 delivered to and receipt of same is hereby acknowledged:
18

19 
20 Patricia A. Marr, Esq.
21 Patricia A. Marr, Ltd.
22 4305 Dean Martin Dr., Ste. #185
23 Las Vegas, Nevada 89103
24
25
26
27
28



CLERK OF THE COURT

SCHD
The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
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8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10-427054-D
Plaintiff,)	DEPT. NO. T
)	
vs.)	DATE OF HEARING:
)	TIME OF HEARING:
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

SCHEDULE OF ARREARAGES

I am owed and entitled to receive certain periodic monthly payments in the form of child support from Defendant, WESLEY LEWIS, pursuant to the Decree of Divorce filed July 15, 2011. Defendant has failed to voluntarily make any and all of these child support payments when due as set forth herein. Support received has been through IRS refund intercept or wage garnishment. Defendant was ordered in the Decree of Divorce to provide health insurance, but ceased doing so in October, 2011. Hence, his child support was increased by the one-half offset he was claiming for the health insurance no longer being paid. Plaintiff has now obtained health insurance as of July of 2013 forward at a cost to her of \$100.00 a month and she therefore requests statutory reimbursement of \$50.00 per month to cover same.

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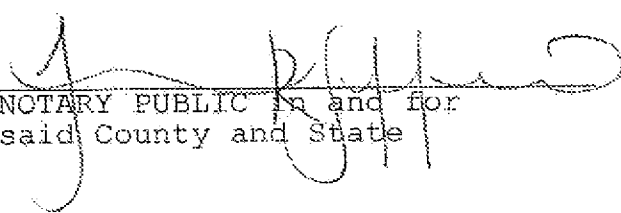
The following schedules are true and accurate statements
of all payment due dates and of any payments received by me during
the month noted.

Further, affiant sayeth naught.

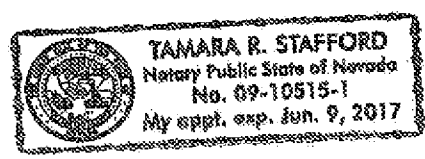


MARIA PERDOMO

SUBSCRIBED AND SWORN to before
me this 27th day of August, 2013



NOTARY PUBLIC in and for
said County and State



Arrearage Calculation Summary

Perdomo vs. Lewis

Page: 1

Report Date: 08/28/2013

Summary of Amounts Due

Total Principal Due 08/12/2013:	\$7,796.74
Total Interest Due 08/12/2013:	\$418.74
Total Penalty Due 08/12/2013:	\$796.88
Amount Due if paid on 08/12/2013:	\$9,012.38
Amount Due if paid on 08/13/2013:	\$9,015.61
Daily Amount accruing as of 08/13/2013:	\$3.23

Date Due	Amount Due	Date Received	Amount Received	Accum. Arrearage	Accum. Interest
06/01/2011	*307.00	06/01/2011	0.00	307.00	0.00
07/01/2011	*307.00	07/01/2011	0.00	614.00	1.32
08/01/2011	*307.00	08/01/2011	0.00	921.00	4.06
09/01/2011	*307.00	09/01/2011	0.00	1,228.00	8.16
10/01/2011	*440.00	10/01/2011	0.00	1,668.00	13.46
11/01/2011	*440.00	11/10/2011	921.00	1,187.00	23.63
12/01/2011	*440.00	12/01/2011	0.00	1,627.00	27.21
01/01/2012	*440.00	01/01/2012	0.00	2,067.00	34.47
02/01/2012	*440.00	02/01/2012	0.00	2,507.00	43.66
03/01/2012	*440.00	03/19/2012	1,162.00	1,785.00	61.70
04/01/2012	*440.00	04/01/2012	0.00	2,225.00	65.03
05/01/2012	*440.00	05/01/2012	0.00	2,665.00	74.60
06/01/2012	*440.00	06/01/2012	0.00	3,105.00	86.45
07/01/2012	*440.00	07/01/2012	0.00	3,545.00	99.81
08/01/2012	*440.00	08/23/2012	308.00	3,677.00	128.15
09/01/2012	*440.00	09/01/2012	0.00	4,117.00	132.90
10/01/2012	*440.00	10/01/2012	0.00	4,557.00	150.62
11/01/2012	*440.00	11/01/2012	0.00	4,997.00	170.88
12/01/2012	*440.00	12/18/2012	140.66	5,296.34	205.64
01/01/2013	*440.00	01/02/2013	157.54	5,578.80	217.10
01/15/2013	0.00	01/15/2013	157.54	5,421.26	227.54
01/29/2013	0.00	01/29/2013	157.54	5,263.72	238.45

02/01/2013	*440.00	02/12/2013	157.54	5,546.18	249.75
02/26/2013	0.00	02/26/2013	157.54	5,388.64	260.92
03/01/2013	*440.00	03/12/2013	157.54	5,671.10	272.46
03/26/2013	0.00	03/26/2013	15.85	5,655.25	283.88
04/01/2013	*440.00	04/08/2013	15.85	6,079.40	294.90
04/22/2013	0.00	04/22/2013	15.85	6,063.54	307.14
05/01/2013	*440.00	05/06/2013	15.85	6,487.69	319.67
05/20/2013	0.00	05/20/2013	15.85	6,471.84	332.73
06/01/2013	*440.00	06/03/2013	15.85	6,895.99	345.89
06/17/2013	0.00	06/17/2013	15.85	6,880.14	359.78
07/01/2013	*440.00	07/01/2013	0.00	7,320.14	373.63
07/01/2013	50.00	07/01/2013	15.85	7,354.29	373.63
07/15/2013	0.00	07/15/2013	15.85	7,338.44	388.44
07/29/2013	0.00	07/29/2013	15.85	7,322.59	403.22
08/01/2013	*440.00	08/01/2013	0.00	7,762.59	406.38
08/01/2013	50.00	08/12/2013	15.85	7,796.74	418.74
Totals	11,448.00		3,651.25	7,796.75	418.74

* Indicates a payment due is designated as child support.

Child Support Penalty Table			
Date Due	Amount Due	Accum. Child Sup. Arrearage	Accum. Penalty
06/01/2011	*307.00	0.00	0.00
07/01/2011	*307.00	307.00	2.52
08/01/2011	*307.00	614.00	7.74
09/01/2011	*307.00	921.00	15.56
10/01/2011	*440.00	1,228.00	25.65
11/10/2011	*440.00	1,187.00	45.02
12/01/2011	*440.00	1,187.00	51.85
01/01/2012	*440.00	1,627.00	65.67
02/01/2012	*440.00	2,067.00	83.17
03/19/2012	*440.00	1,785.00	117.53
04/01/2012	*440.00	1,785.00	123.87
05/01/2012	*440.00	2,225.00	142.11
06/01/2012	*440.00	2,665.00	164.68
07/01/2012	*440.00	3,105.00	190.13
08/23/2012	*440.00	3,677.00	244.11
09/01/2012	*440.00	3,677.00	253.15
10/01/2012	*440.00	4,117.00	286.90
11/01/2012	*440.00	4,557.00	325.50
12/18/2012	*440.00	5,296.34	391.71
01/02/2013	*440.00	5,578.80	413.54
01/15/2013	0.00	5,421.26	433.41
01/29/2013	0.00	5,263.72	454.20
02/12/2013	*440.00	5,546.18	475.72
02/26/2013	0.00	5,388.64	496.99
03/12/2013	*440.00	5,671.10	518.99
03/26/2013	0.00	5,655.25	540.74
04/08/2013	*440.00	6,079.40	561.73
04/22/2013	0.00	6,063.55	585.04
05/06/2013	*440.00	6,487.70	608.90
05/20/2013	0.00	6,471.85	633.79
06/03/2013	*440.00	6,896.00	658.85
06/17/2013	0.00	6,880.15	685.30
07/01/2013	*440.00	6,880.15	711.69
07/01/2013	50.00	7,304.30	711.69

07/15/2013	0.00	7,288.45	739.71
07/29/2013	0.00	7,272.60	767.66
08/01/2013	*440.00	7,272.60	773.64
08/12/2013	50.00	7,696.75	796.89
Totals	11,348.00	7,696.75	796.89

* Indicates a payment due is designated as child support.

Notes:

Payments are applied to oldest unpaid balance.
 Interest and penalties are calculated using number of days past due.
 Payments apply to principal amounts only.
 Interest is not compounded, but accrued only.
 Penalties calculated on past due child support amounts per NRS 125B.095.

Interest Rates Used by Program:

7.00%	from Jan 1960 to Jun 1979		8.00%	from Jul 1979 to Jun 1981
12.00%	from Jul 1981 to Jun 1987		10.25%	from Jul 1987 to Dec 1987
10.75%	from Jan 1988 to Jun 1988		11.00%	from Jul 1988 to Dec 1988
12.50%	from Jan 1989 to Jun 1989		13.00%	from Jul 1989 to Dec 1989
12.50%	from Jan 1990 to Jun 1990		12.00%	from Jul 1990 to Jun 1991
10.50%	from Jul 1991 to Dec 1991		8.50%	from Jan 1992 to Dec 1992
8.00%	from Jan 1993 to Jun 1994		9.25%	from Jul 1994 to Dec 1994
10.50%	from Jan 1995 to Jun 1995		11.00%	from Jul 1995 to Dec 1995
10.50%	from Jan 1996 to Jun 1996		10.25%	from Jul 1996 to Jun 1997
10.50%	from Jul 1997 to Dec 1998		9.75%	from Jan 1999 to Dec 1999
10.25%	from Jan 2000 to Jun 2000		11.50%	from Jul 2000 to Jun 2001
8.75%	from Jul 2001 to Dec 2001		6.75%	from Jan 2002 to Dec 2002
6.25%	from Jan 2003 to Jun 2003		6.00%	from Jul 2003 to Dec 2003
6.00%	from Jan 2004 to Jun 2004		6.25%	from Jul 2004 to Dec 2004
7.25%	from Jan 2005 to Jun 2005		8.25%	from Jul 2005 to Dec 2005
9.25%	from Jan 2006 to Jun 2006		10.25%	from Jul 2006 to Dec 2007
9.25%	from Jan 2008 to Jun 2008		7.00%	from Jul 2008 to Dec 2008
5.25%	from Jan 2009 to Dec 2012		5.25%	from Jan 2013 to Jun 2013
5.25%	from Jul 2013 to Dec 2013			

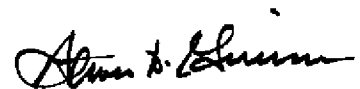
Report created by:

Marshal Law version 4.0

Copyright (c) 1991, 1999, 2001, 2013 Willick Law Group, LLC

The Fine Law Group - Fran@thefinelawgroup.com - (702) 384-8900

End of Report



CLERK OF THE COURT

ROC
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

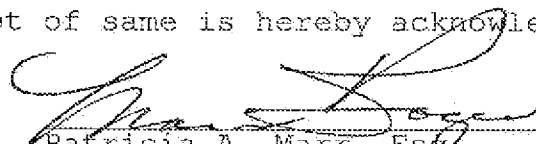
DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT. NO. T
vs.)	
)	DATE OF HEARING: 8-29-13
)	TIME OF HEARING: 1:30 a.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

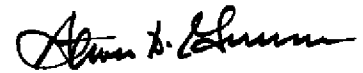
RECEIPT OF COPY

On this 28 day of August, 2013, copies of PLAINTIFF'S
REVISED EXHIBIT LIST, EXHIBIT 24, EXHIBIT 25 AND EXHIBIT 26 were
delivered to and receipt of same is hereby acknowledged:



Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Dr., Ste. #185
Las Vegas, Nevada 89103

DISTRICT COURT
CLARK COUNTY, NEVADA


CLERK OF THE COURT

MARIA DANIELA LEWIS, PLAINTIFF
VS.

CASE NO: D-10-427054-D

WESLEY ALLEN LEWIS, DEFENDANT.

DEPARTMENT T

NOTICE OF HEARING

TO: Frances-Ann Fine, Esq.; Patricia A. Marr, Esq.

Please be advised that the above-entitled matter has been scheduled for **Evidentiary Hearing** to be heard by the Honorable Gayle Nathan at the Family Courts and Services Center, 601 N. Pecos Rd., Las Vegas, Nevada, on the **8th day of October, 2013** at the hour of **10:30 AM** in **Department T**.

YOUR PRESENCE IS NECESSARY.

HONORABLE GAYLE NATHAN

By:



Caryne Pierce
Judicial Executive Assistant

GAYLE NATHAN
DISTRICT JUDGE

FAMILY DIVISION, DEPT. T
LAS VEGAS, NV 89101-2408

CERTIFICATE OF MAILING

I hereby certify that on the above file stamp date:

☐ I placed a copy of the foregoing Notice of Hearing in the appropriate attorney folder located in the Clerk of the Court's Office or

☒ mailed, via first-class mail, postage fully prepaid, the foregoing Notice of Hearing to:

Frances-Ann Fine, Esq.
8975 S Pecos RD STE 5
Henderson, NV 89074

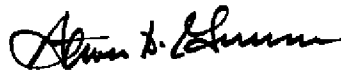
Patricia A. Marr, Esq.
4305 Dean Martin Drive, Suite 185
Las Vegas, NV 89103



Caryne Pierce
Judicial Executive Assistant
Department I

GAYLE NATHAN
DISTRICT JUDGE

FAMILY DIVISION, DEPT. T
LAS VEGAS, NV 89101-2408



CLERK OF THE COURT

ORD
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
Suite 5
8975 South Pecos Road
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10427054-D
Plaintiff.)	DEPT NO. T
)	
vs.)	
)	DATE OF HEARING: 8-9-13
WESLEY ALLEN LEWIS)	TIME OF HEARING: 1:30 p.m.
)	
Defendant.)	
)	

Discover Commissioner's Report And Recommended Order

THIS MATTER having come before the Court on August 9, 2013 for hearing on Plaintiff's Motion To Compel Discovery Responses And For Award Of Attorney's Fees; Plaintiff appearing through her counsel, FRANCES-ANN FINE, ESQ., of The Fine Law Group; Defendant appearing through his counsel, PATRICIA A. MARR, ESQ., of PATRICIA A. MARR, LTD; the Commissioner having reviewed all relevant papers and pleadings on file herein, and having considered the statements and argument by counsel for both parties, and good cause appearing, finds and recommends as follows:

IT IS HEREBY FOUND that although Plaintiff's counsel faxed correspondence to Defendant's counsel seeking to resolve the discovery issues without litigation and to arrange a telephone

RECEIVED

AUG 23 2013

GUARDIANSHIP/DISCOVERY


1 discovery dispute conference, Plaintiff's counsel did not contact
2 Defendant's counsel's office by telephone and therefore failed to
3 comply with EDCR 2.34(d).

4 **IT IS HEREBY RECOMMENDED** that Plaintiff's motion be
5 granted, specifically as to the relief as set forth in Plaintiff's
6 counsel's July 24, 2013 letter to Defendant's counsel.

7 **IT IS FURTHER RECOMMENDED** that Defendant shall by close
8 of business on August 16, 2013 serve upon Plaintiff's counsel
9 supplemental responses to the interrogatories and requests to
10 produce.

11 **IT IS FURTHER RECOMMENDED** that Plaintiff's request for an
12 award of attorney's fees be deferred to the District Court Judge.

13 DATED this 26 day of August 2013.

14 
15 _____
16 **DISCOVERY COMMISSIONER**
NOTICE

17 You are hereby notified that you have ten (10) days from
18 the date you receive this document within which to file any written
19 objections pursuant to NRCP 53:

20 [The Commissioner's Report is deemed received when signed
21 and dated by a party, his attorney or his attorney's
22 employee, or three (3) days after mailing to a party or
23 his attorney, or three (3) days after the Clerk of Courts
deposits a copy of the Report in a folder of a party's
lawyer in the Clerk's office.]

24 A copy of the foregoing DISCOVERY COMMISSIONER'S REPORT
25 AND RECOMMENDED ORDER was:

26 _____ Mailed to Plaintiff/Defendant at the following
27 address on the _____ day of _____, 2013.
28

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✓ Placed in the folder of Plaintiff's/Defendant's
counsel in the Clerk's Office on the 26 day of
August, 2013.

CLERK OF THE COURT

By: 
Deputy Clerk
AMY LUNSFORD

ORDER

The Court, having reviewed the above Report and
Recommendation prepared by the Commissioner in said Case No. D-10-
427054-D,

_____ The parties having waived the right to object thereto.

✓ _____ No timely objections having been filed thereto.

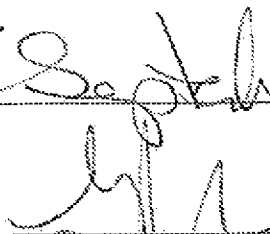
_____ Having received the objections thereto and the written
arguments in support of said objection, and good cause
appearing,

X _____ **IT IS HEREBY ORDERED** the Commissioner's Report and
Recommendations are affirmed and adopted.

_____ **IT IS HEREBY ORDERED** the Commissioner's Report and
Recommendations are affirmed and adopted as modified in
the following manner. (Attached hereto)

// /
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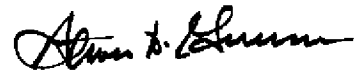
1 IT IS HEREBY ORDERED that a hearing on the Commissioner's
2 Report is set for the _____ day of _____, 2013
3 at the hour of _____ .m.
4 DATED this 12 day of Sept, 2013.


DISTRICT COURT JUDGE
GAYLE NATHAN

9 SUBMITTED BY: APPROVED AS TO FORM AND CONTENT BY:
10
11 

12 The Fine Law Group
13 FRANCES-ANN FINE, ESQ.
14 Nevada Bar No. 0025
15 Suite 5
16 8975 S. Pecos Road
Henderson, Nevada 89074
Attorney for Plaintiff
MARIA DANIELA PERDOMO

Patricia A. Marr, Ltd.
PATRICIA A. MARR, ESQ.
Nevada Bar No. 8846
Suite 185
4305 Dean Martin Drive
Las Vegas, Nevada 89103
Attorney for Defendant
WESLEY ALLEN PERDOMO



CLERK OF THE COURT

NEOJ
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT. NO. T
vs.)	
)	
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

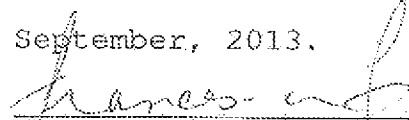
Notice Of Entry Of Discover Commissioner's Report And
Recommended Order

TO: WESLEY ALLEN LEWIS, Defendant; and

TO: PATRICIA A. MARR, ESQUIRE, Attorney for Defendant;

YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an
Discover Commissioner's Report And Recommended Order, a copy of
which is attached hereto, was entered and filed in the above-
entitled matter on the 17th day of September, 2013.

DATED the 20 day of September, 2013.



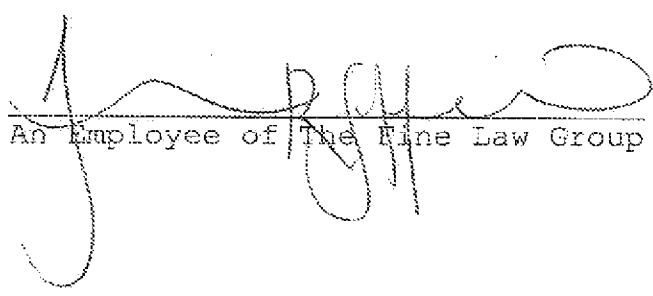
The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
8975 S. Pecos Road, Ste. 5
Henderson, Nevada 89074
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

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CERTIFICATE OF MAILING

I hereby certify that on this 24th day of September,
2013, a copy of the foregoing Notice Of Entry Of Discover
Commissioner's Report And Recommended Order was placed into the
United States Mail, first class postage prepaid at Las Vegas,
Nevada, addressed to:

Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Dr., Ste. #185
Las Vegas, Nevada 89103


An Employee of The Fine Law Group


CLERK OF THE COURT

1 ORD
2 THE FINE LAW GROUP
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 Suite 5
6 8975 South Pecos Road
7 Henderson, Nevada 89074
8 Telephone: 702/384-8900
9 Facsimile: 702/384-6900
10 fran@thefinelawgroup.com
11 Attorney for Plaintiff
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS nka
11 MARIA DANIELA PERDOMO,
12 Plaintiff.

CASE NO. D-10427054-D
DEPT NO. T

13 vs.

14 WESLEY ALLEN LEWIS

15 Defendant.

DATE OF HEARING: 8-9-13
TIME OF HEARING: 1:30 p.m.

Discover Commissioner's Report And Recommended Order

17 THIS MATTER having come before the Court on August 9,
18 2013 for hearing on Plaintiff's Motion To Compel Discovery
19 Responses And For Award Of Attorney's Fees; Plaintiff appearing
20 through her counsel, FRANCES-ANN FINE, ESQ., of The Fine Law Group;
21 Defendant appearing through his counsel, PATRICIA A. MARR, ESQ., of
22 PATRICIA A. MARR, LTD; the Commissioner having reviewed all
23 relevant papers and pleadings on file herein, and having considered
24 the statements and argument by counsel for both parties, and good
25 cause appearing, finds and recommends as follows:

26 IT IS HEREBY FOUND that although Plaintiff's counsel
27 faxed correspondence to Defendant's counsel seeking to resolve the
28 discovery issues without litigation and to arrange a telephone


1 discovery dispute conference, Plaintiff's counsel did not contact
2 Defendant's counsel's office by telephone and therefore failed to
3 comply with EDCR 2.34(d).

4 **IT IS HEREBY RECOMMENDED** that Plaintiff's motion be
5 granted, specifically as to the relief as set forth in Plaintiff's
6 counsel's July 24, 2013 letter to Defendant's counsel.

7 **IT IS FURTHER RECOMMENDED** that Defendant shall by close
8 of business on August 16, 2013 serve upon Plaintiff's counsel
9 supplemental responses to the interrogatories and requests to
10 produce.

11 **IT IS FURTHER RECOMMENDED** that Plaintiff's request for an
12 award of attorney's fees be deferred to the District Court Judge.

13 DATED this 26 day of August, 2013.

14 
15 _____
16 **DISCOVERY COMMISSIONER**
NOTICE

17 You are hereby notified that you have ten (10) days from
18 the date you receive this document within which to file any written
19 objections pursuant to NRCP 53:

20 [The Commissioner's Report is deemed received when signed
21 and dated by a party, his attorney or his attorney's
22 employee, or three (3) days after mailing to a party or
23 his attorney, or three (3) days after the Clerk of Courts
deposits a copy of the Report in a folder of a party's
lawyer in the Clerk's office.]

24 A copy of the foregoing DISCOVERY COMMISSIONER'S REPORT
25 AND RECOMMENDED ORDER was:

26 _____ Mailed to Plaintiff/Defendant at the following
27 address on the _____ day of _____, 2013.
28

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✓ Placed in the folder of Plaintiff's/Defendant's
counsel in the Clerk's Office on the 26 day of
August, 2013.

CLERK OF THE COURT

By: 
Deputy Clerk
AMY LUNSFORD

ORDER

The Court, having reviewed the above Report and
Recommendation prepared by the Commissioner in said Case No. D-10-
427054-D,

_____ The parties having waived the right to object thereto.

✓ _____ No timely objections having been filed thereto.

_____ Having received the objections thereto and the written
arguments in support of said objection, and good cause
appearing,

X _____ **IT IS HEREBY ORDERED** the Commissioner's Report and
Recommendations are affirmed and adopted.

_____ **IT IS HEREBY ORDERED** the Commissioner's Report and
Recommendations are affirmed and adopted as modified in
the following manner. (Attached hereto)

/ / /
/ / /
/ / /
/ / /
/ / /
/ / /
/ / /

1 IT IS HEREBY ORDERED that a hearing on the Commissioner's
2 Report is set for the _____ day of _____, 2013
3 at the hour of _____ .m.

4 DATED this 12 day of Sept, 2013.

5
6
7 DISTRICT COURT JUDGE
GAYLE NATHAN

8
9 SUBMITTED BY:

APPROVED AS TO FORM AND CONTENT BY:

10
11 Frances-Ann Fine
12 The Fine Law Group
13 FRANCES-ANN FINE, ESQ.
14 Nevada Bar No. 0025
15 Suite 5
16 8975 S. Pecos Road
Henderson, Nevada 89074
Attorney for Plaintiff
MARIA DANIELA PERDOMO

Patricia A. Marr
Patricia A. Marr, Ltd.
PATRICIA A. MARR, ESQ.
Nevada Bar No. 8846
Suite 185
4305 Dean Martin Drive
Las Vegas, Nevada 89103
Attorney for Defendant
WESLEY ALLEN PERDOMO

1 ORD
2 THE FINE LAW GROUP
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 Suite 5
6 8975 South Pecos Road
7 Henderson, Nevada 89074
8 Telephone: 702/384-8900
9 Facsimile: 702/384-6900
10 fran@thefinelawgroup.com
11 Attorney for Plaintiff
12 MARIA DANIELA PERDOMO

13 DISTRICT COURT

14 CLARK COUNTY, NEVADA

15 MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10427054-D
Plaintiff.)	DEPT NO. T
)	
vs.)	
)	DATE OF HEARING: 8-9-13
WESLEY ALLEN LEWIS)	TIME OF HEARING: 1:30 p.m.
)	
Defendant.)	

16 Discover Commissioner's Report And Recommended Order

17 THIS MATTER having come before the Court on August 9,
18 2013 for hearing on Plaintiff's Motion To Compel Discovery
19 Responses And For Award Of Attorney's Fees; Plaintiff appearing
20 through her counsel, FRANCES-ANN FINE, ESQ., of The Fine Law Group;
21 Defendant appearing through his counsel, PATRICIA A. MARR, ESQ., of
22 PATRICIA A. MARR, LTD; the Commissioner having reviewed all
23 relevant papers and pleadings on file herein, and having considered
24 the statements and argument by counsel for both parties, and good
25 cause appearing, finds and recommends as follows:

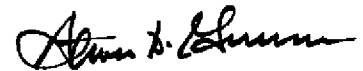
26 IT IS HEREBY FOUND that although Plaintiff's counsel
27 faxed correspondence to Defendant's counsel seeking to resolve the
28 discovery issues without litigation and to arrange a telephone

RECEIVED

AUG 23 2013

GUARDIANSHIP/DISCOVERY

ORDR



CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

Maria Daniela Lewis, Plaintiff.

CASE NO.: D-10-427054-D

DEPT NO.: T

vs.

Wesley Allen Lewis, Defendant.


MINUTE ORDER

TO: ANY AND ALL INTERESTED PARTIES:

YOU WILL PLEASE TAKE NOTICE that review of the court file indicates that a Minute Order was drafted by the Court on October 14, 2013. Neither party appeared nor were their Counsel present and the Court Ordered the minutes shall SUFFICE. Therefore, this Court will prepare said paperwork as follows:

IT IS HEREBY ORDERED that the attached copy of the Minute Order is hereby incorporated herein and will become the Order of this case.

DATED this 17th day of October, 2013.


GAYLE NATHAN
DISTRICT JUDGE, DEPT T

Prepared by the Court

Non-Trial Dispositions:

- | | |
|--|---|
| <input type="checkbox"/> Other | <input checked="" type="checkbox"/> Settled/Withdrawn: |
| <input type="checkbox"/> Dismissed - Want of Prosecution | <input checked="" type="checkbox"/> Without Judicial Conf/Hrg |
| <input type="checkbox"/> Involuntary (Statutory) Dismissal | <input type="checkbox"/> With Judicial Conf/Hrg |
| <input type="checkbox"/> Default Judgment | <input type="checkbox"/> By ADR |
| <input type="checkbox"/> Transferred | |

Trial Dispositions:

- | | |
|---|--|
| <input type="checkbox"/> Disposed After Trial Start | <input type="checkbox"/> Judgment Reached by Trial |
|---|--|

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

October 14, 2013

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

October 14, 2013 10:00 AM Minute Order

HEARD BY: Nathan, Gayle

COURTROOM: Courtroom 14

COURT CLERK: Lucinda Tait

PARTIES:

Isabella Lewis, Subject Minor, not present

Maria Lewis, Plaintiff, Counter Defendant, not present Frances-Ann Fine, Attorney, not present

Wesley Lewis, Defendant, Counter Claimant, not present Patricia Marr, Attorney, not present

JOURNAL ENTRIES

- MINUTE ORDER RE: FINDINGS AND ORDER AFTER EVIDENTIARY HEARING

This matter came before the Court on Plaintiff's Order to Show Cause on August 28, 2013 which was continued to October 8, 2013 because of a power outage that impacted the video recording system; On both dates, Plaintiff was present and represented by Frances-Ann Fine, Esq.; Defendant was present and represented by Patricia Marrs, Esq.; the Court heard testimony and took evidence and makes the following FINDINGS and ORDER:

1. The Court has personal and subject matter in this post-decree matter;
2. On October 8, 2013, the Court found that Exhibit 16 was not consistent with the testimony presented so no weight was given to that exhibit; Exhibit 22 was admitted only for the purpose of establishing that Plaintiff paid Ms. Flores for eight tutoring sessions; The Court ORDERED that Defendant take the minor child Isabella Lewis (Bella), dob 8/10/2006 to the Kuman Tutoring Class that is paid for by mom on Mondays immediately after school; the Court finds this to be in Bella's best interest.
3. The Court had previously set aside the Master's Recommendation and Order under R-11161532-R as the arrears set by that Court did not accurately reflect the correct arrears based upon the child support that was ordered to be paid, to wit, the sum of \$440 for all but three months as the Defendant father failed to maintain the medical insurance for the minor child; As Welfare is on this case the

PRINT DATE: 10/17/2013

Page 1 of 3

Minutes Date:

October 14, 2013

Court ORDERS that the District Attorney's Office shall make a new Judgment consistent with this Order, to wit, that Defendant was ordered to pay \$440 monthly in child support; he was afforded an offset of \$133.00 for insurance, thus his child support for the months of June 2011; July 2011 and August 2011, ONLY is set at \$307 per month; and that the TOTAL ARREARS up to and including August 2013 is \$9012.38 with interest and penalty. For each and every month thereafter his child support is set at \$440 per month through August, 2013.

4. The Court finds that the Defendant's testimony that he is working only 26 hours per week so that he can care for Bella on his days off is not compelling to the Court as Bella is now in her second year of elementary school (albeit repeating the first grade). There was no testimony that Defendant was physically or mentally impaired or disabled or unable to work. The Court finds that the Defendant has a duty to financially support his daughter by working a full time job as the Mother of his child does and it was apparent from the testimony and evidence that he does not meet his financial obligations on 26 hours per week; the Court accepts the Plaintiff's testimony that she has, at times, worked three jobs to support herself and Bella. The Court finds that, based upon the Defendant's continuing failure since 2011 to pay his Court Ordered Child Support on a consistent monthly basis, that 26 hours of work per week is not sufficient to meet the financial needs of his child. The Court declines to set aside the Child Support Order of 2011 that set the child support at \$440 or to make this Order retroactive to August 2012 when he made application to have his Child Support reviewed in Child Support Court. See below on Credibility.

5. Whether Defendant chooses to work 40 hours is up to him, however, the Court finds that he is willfully underemployed and is imputing another 16 hours of wages at this time; A review of the Defendant's paystubs reflects that he is paid an hourly wage of \$9 per hour and is paid commission as well. Although his July and August 2013 paystubs do not reflect commission, his May 2013 paystubs reflect commission; Additionally, on the Pay Stub for Pay Date 8/2/2013 his year to date for commissions was \$3069; for 7 months that is \$438.42 per month in income for commissions; this could be looked at in several ways, even breaking down to an increased hourly amount to calculate income on, however the Court will calculate 40 hours per week at \$9 per hour for a gross monthly of \$1560; adding in \$438 in average commissions, his gross monthly is set at \$1998 per month.

6. Plaintiff's income is \$1495 per month; 18% of that is \$269.00. Defendant's income is \$1998 per month; 18% of that is \$360.00. The difference is \$91.00 with Defendant the obligor.

Additionally, Plaintiff maintains insurance for the minor child at a cost to her of \$100 per month. Defendant is ordered to pay one half of that, increasing his child support to \$141.00 per month.

7. On ARREARS: Once the District Attorneys Office has calculated arrears based upon paragraph 3, to which interest and penalties must be calculated; Defendant shall pay the sum of \$100 on the arrears until said sum is paid in full.

8. Therefore, Defendant's Child Support Obligation, with insurance and a payment on Arrears is a total of \$241 per month commencing October 2013. Until the full amount is deducted from his paycheck the Defendant is responsible for paying the Plaintiff the full amount each and every month; In October the full amount is due to Plaintiff by October 31, 2013; in November he may pay \$120.50 on the 5th of the month and \$120.50 on the 20th of the month, and every month thereafter until there is a wage assignment in place for the full amount. Failure to make any one payment is a Contempt of Court and Plaintiff may submit an Order to Show Cause with a supporting Affidavit/Declaration detailing the missed payment(s) to obtain an evidentiary hearing re contempt.

PRINT DATE:	10/17/2013	Page 2 of 3	Minutes Date:	October 14, 2013
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9. On the issue of CREDIBILITY ; the Defendant testified on several issues where the Court found his credibility suspect, or that he was motivated to act in a manner that was contrary to the best interest of his minor child;

A. Defendant testified that his current income was \$900 per month; the Court found his income to be, at a minimum \$1481 per month, when looking at the year to date on his paystubs (noting that the calculation used to set child support uses his hourly on 40 hours and a sum that is equal to his average monthly commission as his gross monthly). The Court finds that his testimony, on his gross monthly income was not credible as it was not supported by the math in an analysis of his paystubs.

B. Defendant testified that Plaintiff moved in with someone he didn't know which "affected" him and that it was hard for him to handle; the Court finds that he was motivated to not cooperate or co-parent or pay his child support based upon his feelings toward this third party and Plaintiff's new relationship.

C. The Court did not find Defendant credible that he sits down for 2 hours every day to go over his first grade daughter's homework with her.

D. The Court did not find Defendant credible when he testified that he did not know Bella was in gymnastics classes or mini-cheer; it defies the Court's understanding of children that Bella did not want to show off her tumbling and cheer skills to her daddy; additionally, he testified that he was asked to buy cheer shoes for Bella and he declined to do so. He was invited to events involving cheer/gymnastics but did not attend. All of this testimony underlined his credibility.

10. The Court has concerns about co-parenting issues that were not before it; these include Defendant not charging Bella's telephone so that Plaintiff has daily access to her daughter; not bringing Bella to Kumon Tutoring that Plaintiff is paying \$200 per month for; ignoring the activities that Plaintiff has Bella involved in and not sharing the activities he has Bella involved in with Plaintiff. Defendant is cautioned to actively engage in co-parenting with Plaintiff.

CONTINUED (see page 2)...

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	10/17/2013	Page 3 of 3	Minutes Date:	October 14, 2013
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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****October 14, 2013**

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

October 14, 2013 10:00 AM Minute Order

HEARD BY: Nathan, Gayle

COURTROOM: Courtroom 14

COURT CLERK: Lucinda Tait

PARTIES:

Isabella Lewis, Subject Minor, not present

Maria Lewis, Plaintiff, Counter Defendant, not present Frances-Ann Fine, Attorney, not present

Wesley Lewis, Defendant, Counter Claimant, not present Patricia Marr, Attorney, not present

JOURNAL ENTRIES

- MINUTE ORDER RE: FINDINGS AND ORDER FROM EVIDENTIARY HEARING
(CONTINUED...PART 2)

11. The Court finds that Defendant has lived with his parents since August of 2012, hence he has built in daycare, when needed. Additionally, his rent is listed at \$300 per month; the Court infers that it is unlikely he would be evicted if he was late or missed a rent payment. The Court finds that Defendant's monthly expenses are minimal.

12. The Court finds that Defendant is in contempt for his non-payment of child support as follows: In 2011; for June, July, August, September ; In 2012 for January , May, June, July, September, October and November.

13. For his contempt the Defendant is sanctioned the sum of \$500 for each and every missed payment as set forth above, for a total sanction of $11 \times \$500 = \5500 . Said sum is herein reduced to Judgment and may be collected by any and all lawful means. The Court is also imposing a 10 day jail sentence for each of the 11 contempt s for a total sentence of 110 days; said jail sentence is stayed ; jail will be imposed on any future missed payments.

14. Additionally, the Court finds that Defendant is responsible for some if not all of Plaintiff s attorney fees. While the Court finds that both counsel meet the Brunzell factors as set forth in that case and applied herein, the Plaintiff has met her burden and established contempt. Ms. Fine will draft the final Order and forward it to Ms. Marrs for approval and signature and Ms. Fine will submit

PRINT DATE:	10/17/2013	Page 1 of 2	Minutes Date:	October 14, 2013
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a Memorandum of Fees and Costs for the Court to review in determining an attorney award.

15. The Court finds it is in Bella's best interest, and an appropriate expense under NRS 125B.080(k) that both parties share in the cost of Bella's tutoring as she is currently being serviced through Kuman Tutoring; as Plaintiff has paid for October, 2013, Defendant is ORDERED to pay for November's tutoring, in FULL by the due date for November; failure to pay will be a contempt of Court and Plaintiff may submit an Order to Show Cause with a supporting Affidavit/Declaration detailing the missed payment(s) to obtain an evidentiary hearing re contempt. Thereafter the parties will equally share the cost, paying on the due date so there is no break in the delivery of tutoring services. Bella will continue to receive tutoring services until she is testing at or above grade level as tested by Kunam, or if they do not test by the CRT's administered by CCSD, or the parents mutually decide to terminate the service. If she is testing at or above grade level and one parent wishes to continue the tutoring, that will be at that parent's expense. If she needs tutoring again in the future, based upon her grades or a teacher recommendation, this ORDER stands; to wit, the cost will be equally borne.

16. The Court declines to award any costs the Plaintiff has borne in the past for extra curricular activities or the cell phone; the Court is denying the request they equally bear the cost of gymnastics and cheer or any other recreational activity.

17. Other than the tutoring the Parties are ORDERED not to enroll the child in an activity during the other parent's timeshare without that parent's WRITTEN AGREEMENT to the activity.

IT IS SO ORDERED.

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	10/17/2013	Page 2 of 2	Minutes Date:	October 14, 2013
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1 NEO

2 DISTRICT COURT
3 FAMILY DIVISION
4 CLARK COUNTY, NEVADA


CLERK OF THE COURT

5 ****

6 Maria Daniela Lewis, Plaintiff.

CASE NO.: D-10-427054-D

DEPT NO.: T

7 vs.

8 Wesley Allen Lewis, Defendant.


9 **NOTICE OF ENTRY OF MINUTE ORDER**

10 **TO: ALL PARTIES AND/OR THEIR ATTORNEYS**

11
12 Please take note that after a review of the court file, a Minute Order was
13 prepared by the Court. A copy of the Minute Order is attached hereto. I hereby certify
14 that I caused on the above file stamped date, a copy of the attached **MINUTE ORDER**
15 to be mailed postage prepaid to the following person or persons at their last known
16 address:

17 Frances-Ann Fine, Esq.
18 8975 S. Pecos Rd. #5
Henderson, NV. 89074

19 Patricia Marr, Esq.
20 4305 Dean Martin Drive, Suite 185
Las Vegas, NV. 89103

21 
22 Caryne Pierce
23 Judicial Assistant, Department T
24
25
26
27
28

1 ORDR
2
3
4


CLERK OF THE COURT

5 DISTRICT COURT
6 CLARK COUNTY, NEVADA
7 ***

8 Maria Daniela Lewis, Plaintiff.

CASE NO.: D-10-427054-D

DEPT NO.: T

9 vs.

10 Wesley Allen Lewis, Defendant.

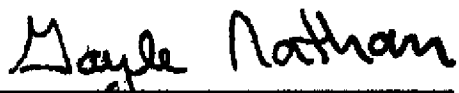
11 **MINUTE ORDER**
12

13 TO: ANY AND ALL INTERESTED PARTIES:

14 YOU WILL PLEASE TAKE NOTICE that review of the court file indicates that a
15 Minute Order was drafted by the Court on October 14, 2013. Neither party appeared
16 nor were their Counsel present and the Court Ordered the minutes shall SUFFICE.
17 Therefore, this Court will prepare said paperwork as follows:
18

19 IT IS HEREBY ORDERED that the attached copy of the Minute Order is hereby
20 incorporated herein and will become the Order of this case.

21 DATED this 17th day of October, 2013.
22

23 
24 **GAYLE NATHAN**
25 **DISTRICT JUDGE, DEPT T**

26 Prepared by the Court
27

28 **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:
☐ Disposed After Trial Start
☐ Judgment Reached by Trial

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

October 14, 2013

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

October 14, 2013 10:00 AM Minute Order

HEARD BY: Nathan, Gayle

COURTROOM: Courtroom 14

COURT CLERK: Lucinda Tait

PARTIES:

Isabella Lewis, Subject Minor, not present

Maria Lewis, Plaintiff, Counter Defendant, not present Frances-Ann Fine, Attorney, not present

Wesley Lewis, Defendant, Counter Claimant, not present Patricia Marr, Attorney, not present

JOURNAL ENTRIES

- MINUTE ORDER RE: FINDINGS AND ORDER AFTER EVIDENTIARY HEARING

This matter came before the Court on Plaintiff's Order to Show Cause on August 28, 2013 which was continued to October 8, 2013 because of a power outage that impacted the video recording system; On both dates, Plaintiff was present and represented by Frances-Ann Fine, Esq.; Defendant was present and represented by Patricia Marrs, Esq.; the Court heard testimony and took evidence and makes the following FINDINGS and ORDER:

1. The Court has personal and subject matter in this post-decree matter;
2. On October 8, 2013, the Court found that Exhibit 16 was not consistent with the testimony presented so no weight was given to that exhibit; Exhibit 22 was admitted only for the purpose of establishing that Plaintiff paid Ms. Flores for eight tutoring sessions; The Court ORDERED that Defendant take the minor child Isabella Lewis (Bella), dob 8/10/2006 to the Kuman Tutoring Class that is paid for by mom on Mondays immediately after school; the Court finds this to be in Bella's best interest.
3. The Court had previously set aside the Master's Recommendation and Order under R-11161532-R as the arrears set by that Court did not accurately reflect the correct arrears based upon the child support that was ordered to be paid, to wit, the sum of \$440 for all but three months as the Defendant father failed to maintain the medical insurance for the minor child; As Welfare is on this case the

PRINT DATE: 10/17/2013

Page 1 of 3

Minutes Date:

October 14, 2013

Court ORDERS that the District Attorney's Office shall make a new Judgment consistent with this Order, to wit, that Defendant was ordered to pay \$440 monthly in child support; he was afforded an offset of \$133.00 for insurance, thus his child support for the months of June 2011; July 2011 and August 2011, ONLY is set at \$307 per month; and that the TOTAL ARREARS up to and including August 2013 is \$9012.38 with interest and penalty. For each and every month thereafter his child support is set at \$440 per month through August, 2013.

4. The Court finds that the Defendant's testimony that he is working only 26 hours per week so that he can care for Bella on his days off is not compelling to the Court as Bella is now in her second year of elementary school (albeit repeating the first grade). There was no testimony that Defendant was physically or mentally impaired or disabled or unable to work. The Court finds that the Defendant has a duty to financially support his daughter by working a full time job as the Mother of his child does and it was apparent from the testimony and evidence that he does not meet his financial obligations on 26 hours per week; the Court accepts the Plaintiff's testimony that she has, at times, worked three jobs to support herself and Bella. The Court finds that, based upon the Defendant's continuing failure since 2011 to pay his Court Ordered Child Support on a consistent monthly basis, that 26 hours of work per week is not sufficient to meet the financial needs of his child. The Court declines to set aside the Child Support Order of 2011 that set the child support at \$440 or to make this Order retroactive to August 2012 when he made application to have his Child Support reviewed in Child Support Court. See below on Credibility.

5. Whether Defendant chooses to work 40 hours is up to him, however, the Court finds that he is willfully underemployed and is imputing another 16 hours of wages at this time; A review of the Defendant's paystubs reflects that he is paid an hourly wage of \$9 per hour and is paid commission as well. Although his July and August 2013 paystubs do not reflect commission, his May 2013 paystubs reflect commission; Additionally, on the Pay Stub for Pay Date 8/2/2013 his year to date for commissions was \$3069; for 7 months that is \$438.42 per month in income for commissions; this could be looked at in several ways, even breaking down to an increased hourly amount to calculate income on, however the Court will calculate 40 hours per week at \$9 per hour for a gross monthly of \$1560; adding in \$438 in average commissions, his gross monthly is set at \$1998 per month.

6. Plaintiff's income is \$1495 per month; 18% of that is \$269.00. Defendant's income is \$1998 per month; 18% of that is \$360.00. The difference is \$91.00 with Defendant the obligor.

Additionally, Plaintiff maintains insurance for the minor child at a cost to her of \$100 per month. Defendant is ordered to pay one half of that, increasing his child support to \$141.00 per month.

7. On ARREARS: Once the District Attorneys Office has calculated arrears based upon paragraph 3, to which interest and penalties must be calculated; Defendant shall pay the sum of \$100 on the arrears until said sum is paid in full.

8. Therefore, Defendant's Child Support Obligation, with insurance and a payment on Arrears is a total of \$241 per month commencing October 2013. Until the full amount is deducted from his paycheck the Defendant is responsible for paying the Plaintiff the full amount each and every month; In October the full amount is due to Plaintiff by October 31, 2013; in November he may pay \$120.50 on the 5th of the month and \$120.50 on the 20th of the month, and every month thereafter until there is a wage assignment in place for the full amount. Failure to make any one payment is a Contempt of Court and Plaintiff may submit an Order to Show Cause with a supporting Affidavit/Declaration detailing the missed payment(s) to obtain an evidentiary hearing re contempt.

PRINT DATE:	10/17/2013	Page 2 of 3	Minutes Date:	October 14, 2013
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9. On the issue of CREDIBILITY ; the Defendant testified on several issues where the Court found his credibility suspect, or that he was motivated to act in a manner that was contrary to the best interest of his minor child;

A. Defendant testified that his current income was \$900 per month; the Court found his income to be, at a minimum \$1481 per month, when looking at the year to date on his paystubs (noting that the calculation used to set child support uses his hourly on 40 hours and a sum that is equal to his average monthly commission as his gross monthly). The Court finds that his testimony, on his gross monthly income was not credible as it was not supported by the math in an analysis of his paystubs.

B. Defendant testified that Plaintiff moved in with someone he didn't know which "affected" him and that it was hard for him to handle; the Court finds that he was motivated to not cooperate or co-parent or pay his child support based upon his feelings toward this third party and Plaintiff's new relationship.

C. The Court did not find Defendant credible that he sits down for 2 hours every day to go over his first grade daughter's homework with her.

D. The Court did not find Defendant credible when he testified that he did not know Bella was in gymnastics classes or mini-cheer; it defies the Court's understanding of children that Bella did not want to show off her tumbling and cheer skills to her daddy; additionally, he testified that he was asked to buy cheer shoes for Bella and he declined to do so. He was invited to events involving cheer/gymnastics but did not attend. All of this testimony underlined his credibility.

10. The Court has concerns about co-parenting issues that were not before it; these include Defendant not charging Bella's telephone so that Plaintiff has daily access to her daughter; not bringing Bella to Kumon Tutoring that Plaintiff is paying \$200 per month for; ignoring the activities that Plaintiff has Bella involved in and not sharing the activities he has Bella involved in with Plaintiff. Defendant is cautioned to actively engage in co-parenting with Plaintiff.

CONTINUED (see page 2)...

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	10/17/2013	Page 3 of 3	Minutes Date:	October 14, 2013
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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

October 14, 2013

D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.

October 14, 2013 10:00 AM Minute Order

HEARD BY: Nathan, Gayle

COURTROOM: Courtroom 14

COURT CLERK: Lucinda Tait

PARTIES:

Isabella Lewis, Subject Minor, not present

Maria Lewis, Plaintiff, Counter Defendant, not present Frances-Ann Fine, Attorney, not present

Wesley Lewis, Defendant, Counter Claimant, not present Patricia Marr, Attorney, not present

JOURNAL ENTRIES

**- MINUTE ORDER RE: FINDINGS AND ORDER FROM EVIDENTIARY HEARING
(CONTINUED...PART 2)**

11. The Court finds that Defendant has lived with his parents since August of 2012, hence he has built in daycare, when needed. Additionally, his rent is listed at \$300 per month; the Court infers that it is unlikely he would be evicted if he was late or missed a rent payment. The Court finds that Defendant's monthly expenses are minimal.

12. The Court finds that Defendant is in contempt for his non-payment of child support as follows: In 2011; for June, July, August, September ; In 2012 for January , May, June, July, September, October and November.

13. For his contempt the Defendant is sanctioned the sum of \$500 for each and every missed payment as set forth above, for a total sanction of $11 \times \$500 = \5500 . Said sum is herein reduced to Judgment and may be collected by any and all lawful means. The Court is also imposing a 10 day jail sentence for each of the 11 contempt s for a total sentence of 110 days; said jail sentence is stayed ; jail will be imposed on any future missed payments.

14. Additionally, the Court finds that Defendant is responsible for some if not all of Plaintiff s attorney fees. While the Court finds that both counsel meet the Brunzell factors as set forth in that case and applied herein, the Plaintiff has met her burden and established contempt. Ms. Fine will draft the final Order and forward it to Ms. Marrs for approval and signature and Ms. Fine will submit

PRINT DATE:	10/17/2013	Page 1 of 2	Minutes Date:	October 14, 2013
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a Memorandum of Fees and Costs for the Court to review in determining an attorney award.

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16. The Court declines to award any costs the Plaintiff has borne in the past for extra curricular activities or the cell phone; the Court is denying the request they equally bear the cost of gymnastics and cheer or any other recreational activity.

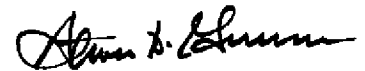
17. Other than the tutoring the Parties are ORDERED not to enroll the child in an activity during the other parent's timeshare without that parents WRITTEN AGREEMENT to the activity.

IT IS SO ORDERED.

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	10/17/2013	Page 2 of 2	Minutes Date:	October 14, 2013
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CLERK OF THE COURT

MEMO
The Fine & Price Law Group
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
Suite 5
8975 South Pecos Road
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorneys for Plaintiff
MARIA DANIELA PERDOMO fka
MARIA DANIELA LEWIS

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS,)	
)	CASE NO: D-10-427054-D
Plaintiff,)	DEPT NO: T
)	
vs.)	DATE OF TRIAL: 10-8-13
)	TIME OF TRIAL: 10:30 a.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

Plaintiff's Memorandum Of Fees And Costs

COMES NOW, Plaintiff, MARIA DANIELA PERDOMO, formerly known as MARIA DANIELA LEWIS, by and through her attorney, FRANCES-ANN FINE, ESQ., of The & Price Fine Law Group, pursuant to the Court's directive contained in its Court Minutes issued on October 14, 2013, and submits Plaintiff's Memorandum Of Fees And Costs.

POINTS AND AUTHORITIES

The evidentiary hearing in the instant matter was begun on August 28, 2013 and continued until October 8, 2013 when it was concluded. At that time the Court took the matter under submission. On October 14, 2013 the Court issued its Minute Order setting forth its rulings on the various issues before it.

1 The Minute Order issued on October 14, 2013 noted that
2 "the Court finds that Defendant is responsible for some if not all
3 of Plaintiff's attorney fees." It further held that:

4 "While the Court finds that both counsel meet the
5 Brunzell factors as set forth in that case and applied
6 herein, the Plaintiff has met her burden and established
7 contempt."

8 The Court directed Plaintiff's counsel to "submit a Memorandum of
9 Fees and Costs for the Court to review in determining an attorney
10 award." The instant Plaintiff's Memorandum of Fees And Costs is
11 being submitted in compliance with this directive.

12 Attached hereto as **Exhibit "1"** is a copy of Plaintiff's
13 invoice detailing all attorney fees and costs incurred by her
14 within this litigation as well as payments received from Plaintiff.
15 As reflected therein, Plaintiff's attorney fees through the
16 drafting of this memorandum total \$24,005.00. Total
17 costs/disbursements equal \$837.87. The total of the two is
18 \$24,842.87.

19 **Exhibit "1"** also sets forth the payments made to The Fine
20 Law Group by Plaintiff. As reflected therein, payments made by
21 Plaintiff and by family on her behalf total \$11,200.96. The total
22 attorney fees and costs incurred by Plaintiff in the instant case
23 is \$24,842.87. The total of her payments is \$11,200.96. The
24 resulting balance presently due and owing is \$13,641.91.

25 NRS Chapter 18 authorizes an award of attorney fees to a
26 "prevailing party". Based upon the Court's rulings herein, there
27 can be no doubt that Plaintiff has been the prevailing party. NRS
28 125.180 provides authority for a court to award attorney fees and
costs in awarding a judgment for support arrears. Finally, EDCR

1 7.60(5) provides for the awarding of attorney fees and costs as
2 sanctions for contempts.

3 With specific reference to Family Law matters, the
4 Supreme Court of Nevada has re-adopted "well-known basic elements,"
5 which in addition to hourly time schedules maintained by the
6 attorney, are to be considered in determining the reasonable value
7 of an attorney's service qualities. These factors were first set
8 forth in Brunzell v. Golden Gate National Bank, 85 Nev. 345, 455
9 P.2d 31 (1969), and are as follows:

10 1. The Qualities of the Advocate: his ability,
11 training, education, experience, professional standing
and skill.

12 2. The Character of the Work to be Done: its
13 difficulty, its intricacy, its importance, time and skill
14 required, the responsibility imposed and the prominence
and character of the parties where they affect the
importance of the litigation.

15 3. The Work Actually Performed by the Lawyer: the
16 skill, time and attention given to the work.

17 4. The Result: whether the attorney was
18 successful and what benefits were derived.

19 Each of these factors should be given consideration, and
20 no element should predominate or be given undue weight. Miller v.
Wilfong, 121 Nev. 619, 119 P.2d 727 (2005).

21 In the case at bar, it is respectfully submitted that
22 Plaintiff's counsel is experienced in the practice of family law
23 and is of good professional standing. She has practiced family law
24 for many years. As to the "character of the work", it is submitted
25 that extensive pre-evidentiary hearing work was performed in
26 addition to preparation for and the conducting of the evidentiary
27 hearing.

28 / / /

1 As for the quality of the work performed, it is further
2 submitted that the record reflects that Plaintiff's counsel
3 diligently reviewed the applicable law and explored the relevant
4 facts and properly applied one to the other. The preparation for,
5 and representation of Plaintiff at, the evidentiary hearing was
6 performed in a professional and thorough manner.

7 As for the factor termed "the result", as noted above
8 Plaintiff is the prevailing party on all of the major issues
9 addressed at the evidentiary hearing. Based upon all of the
10 foregoing, it is respectfully submitted that an award of the
11 entirety of her attorney fees and costs to Plaintiff is warranted.

12 DATED this 7th day of November, 2013.

13
14 

15 The Fine & Price Law Group
16 FRANCES-ANN FINE, ESQ.
17 Nevada Bar No. 0025
18 Attorney for Plaintiff
19 MARIA DANIELA PERDOMO

20 CERTIFICATE OF SERVICE

21 I hereby certify that on the 7th day of November, 2013,
22 service of the foregoing Plaintiff's Memorandum Of Fees And Costs
23 was made by placing a copy of same into the United States Mail,
24 first class postage prepaid, at Henderson, Nevada, addressed to:

25 Patricia Marr, Esquire
26 4305 Dean Martin Drive, Ste. 185
27 Las Vegas, Nevada 89103
28

29 
30 An Employee of The Fine & Price Law Group

EXHIBIT "1"

The Fine Law Group

8975 South Pecos Road

Suite 5

Henderson, NV 89074

Ph: 702-384-8900

Fax: 702-384-6900

Pantelis Palamidis
134 Calle Bella Vista
Camarillo, CA
93010

November 7, 2013

Attention:

File #: PerdomoM001

Inv #: Settle

RE:

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Feb-19-13	Meet with client on child custody issue and draft email to Earl regarding his consideration of chances to modify primary physical custody	1.00	350.00	FAF
Apr-20-13	Review draft of Motion and interoffice conference regarding preparation of Motion for Order to Show Cause why Defendant Should not be Held in Contempt	0.30	120.00	FAF
Apr-24-13	Review and revise Motion and Order to Show Cause	1.00	400.00	FAF
Apr-25-13	Continue to review and revise Order to Show Cause	0.50	200.00	FAF
Apr-30-13	Continue research in preparation of drafting the motion; Email communications with staff regarding the passport issue and child support arrears	0.50	200.00	FAF
	Interoffice conferences with FAF; Review file documents and court file on Odyssey; Begin revision of motion.	1.70	425.00	EA
May-01-13	Review and revise Motion and meet with client	1.40	560.00	FAF
	Interoffice conferences with FAF; Complete revision of draft of motion.	1.90	475.00	EA

May-02-13	Email to client requesting information as to when we will receive info	0.20	80.00	FAF
	Interoffice conference with FAF.	0.10	25.00	EA
May-20-13	Interoffice conference regarding if opposing party retained counsel or filed opposition?	0.20	80.00	FAF
May-24-13	Interoffice conference regarding receiving any response - Confirm that nothing has been filed; Draft Request for Submission without oral argument	0.30	120.00	FAF
May-28-13	Review email from client; Attempt to reach opposing counsel; Responded to client's email	0.20	80.00	FAF
May-29-13	Review Opposition and Countermotion and begin response	0.40	160.00	FAF
	Interoffice conference with FAF; Review file documents; Draft certificate of service re Schedule Of Arrearages; Initial review of opposition and countermotion.	0.80	200.00	EA
May-30-13	Review and revise Reply and arrange for filing	0.70	280.00	FAF
	Review of file documents; Email correspondence with client; Phone conference with client; Draft Reply to opposition and countermotion.	4.30	1,075.00	EA
Jun-03-13	Review file and emails; Begin preparation for hearing in the morning	1.00	400.00	FAF
	Review email from client's step-father; Interoffice conference with FAF.	0.20	50.00	EA
Jun-04-13	Prepare for and appear at hearing on our Motion to hold the Defendant in contempt; Draft Order regarding passports and forward to opposing counsel, if no response by Friday, forward to Court for signature	3.00	1,200.00	FAF
	Interoffice conference with FAF re hearing.	0.10	25.00	EA
Jun-06-13	Interoffice conference with FAF; Begin review of documents re preparation for evidentiary hearing.	0.20	50.00	EA
Jun-07-13	Review and revise Order from the hearing and	0.60	240.00	FAF

	forward to Patricia Marr; Draft, review and revise letter to court regarding Order specifically regarding passport due to Ms. Marr's refusal to respond and/or execute proposed order			
	Transfer and review video of hearing; Draft order.	1.60	400.00	EA
Jun-10-13	Begin draft of discovery requests; Draft email to client; Review letter from opposing attorney.	1.20	300.00	EA
Jun-11-13	Complete drafts of discovery requests.	1.60	400.00	EA
Jun-12-13	Confirm discovery requests have been sent to opposing counsel	0.40	160.00	FAF
Jun-14-13	Review Order; Draft Initial Witness List; Interoffice conference with FAF re status.	0.30	75.00	EA
Jun-17-13	Interoffice conference with TS; Draft Initial Witness List; Draft letter to opposing attorney re proposed order.	0.40	100.00	EA
Jun-18-13	Draft letter to opposing attorney re order; Draft order to show cause; Interoffice conference with TS.	0.90	225.00	EA
Jul-10-13	Review discovery and respond	0.30	120.00	FAF
	Initial review of school documents provided by client.	0.30	75.00	EA
Jul-11-13	Review school records provided by client; Draft 16.2 Document Production.	1.40	350.00	EA
Jul-12-13	Complete draft of 16.2 Document production.	0.20	50.00	EA
Jul-15-13	Interoffice conference with FAF re status.	0.10	25.00	EA
Jul-18-13	Begin review of discovery responses.	0.70	175.00	EA
Jul-24-13	Proof of Service	0.30	105.00	CMP
	Acceptance of Service	0.30	105.00	CMP
	Complete review and analysis of discovery	1.80	450.00	EA

	received from opposing attorney; Draft letter to opposing attorney re same.			
Jul-29-13	Review emails and respond	0.50	200.00	FAF
	Review email correspondence with client; Interooffice conference with FAF.	0.20	50.00	EA
Jul-30-13	Review email correspondence with client.	0.10	25.00	EA
Jul-31-13	Respond to email regarding audit and attaching order; Request Chid Support to conduct Audit and inquire when it will be completed	0.30	120.00	FAF
Aug-02-13	Begin draft of motion to compel.	0.60	150.00	EA
Aug-05-13	Email correspondence with client; Continue draft of motion to compel.	0.50	125.00	EA
Aug-06-13	Review and revise Motion to Compel with Order Shortening Time set for Friday, August 9, 2013 and coordinate service of same	0.50	200.00	FAF
	Complete draft of motion to compel.	1.10	275.00	EA
Aug-09-13	Prepare for and appear at discovery hearing; Begin draft of DC Report and Reccomendations, TC with Family Support regarding whereabouts of audit or payment confirmation	2.00	800.00	FAF
Aug-14-13	Review Minutes of hearing before Discovery Commissioner; Draft Report And Recommended Order; Draft letter to opposing attorney.	0.50	125.00	EA
Aug-15-13	Review Defendant's Amended Witness List And Document Production.	0.10	25.00	EA
Aug-16-13	Review file documents to prepare for meeting with client; Office conference with client.	2.20	550.00	EA
Aug-19-13	Review documents and memo regarding trial preparation	1.00	400.00	FAF
	Review letter from Family Support Division and draft responsive letter to same; Phone conference with client; Review opposing	2.30	575.00	EA

	attorney's supplemental discovery responses; Draft memo to FAF re status of case.			
Aug-21-13	Review interoffice memo in preparation for hearing; Review documents supplied to us by opposing counsel and interoffice conference regarding amending discovery recommendations and Order	0.60	240.00	FAF
	Prepare for evidentiary hearing; Begin draft of Pre-Hearing Brief.	3.90	975.00	EA
Aug-22-13	Trial preparation; Complete draft of pre-trial memo.	4.80	1,200.00	EA
Aug-23-13	Review pre-trial memo and submit discovery recommendations	0.30	120.00	FAF
	Review opposing attorney's pre-trial memo; Trial preparation, including review of opposing attorney's exhibits.	0.60	150.00	EA
Aug-26-13	Review draft examination questions	0.40	160.00	FAF
	Review file documents and analyze parties' positions; Phone conference with client; Draft letter to opposing attorney; Interoffice conference with FAF re status.	1.70	425.00	EA
	Trial preparation.	2.60	650.00	EA
Aug-27-13	Prepare for Evidentiary Hearing; Review Maria's and Wesley's testimony; Re-draft updated schedule of arrearages; Review Exhibit 8 which are miscellaneous receipts	2.40	960.00	FAF
	Trial preparation.	2.40	600.00	EA
Aug-28-13	Review file and prepare for hearing	1.00	400.00	FAF
	Trial preparation.	2.50	625.00	EA
Aug-29-13	Prepare for and appear at Evidentiary Hearing regarding child support and other issues	6.00	2,400.00	FAF
Sep-10-13	Review email correspondence with client; Interoffice conference with FAF re same.	0.20	45.00	EA
Sep-13-13	Interoffice conference with FAF re status.	0.10	22.50	EA

Sep-19-13	Interoffice conference with FAF.	0.10	22.50	EA
Sep-30-13	Courtesy Discount		-2,500.00	FAF
	Reversal of courtesy discount		2,500.00	FAF
	Prepare for and participate in office conference with client and FAF.	0.50	125.00	EA
Oct-08-13	Prepare for and appear in court for conclusion of hearing	3.00	1,200.00	FAF
Oct-10-13	Review and revise letter to City District Attorney	0.20	80.00	FAF
	Draft letter to DA Family Support Division.	0.30	75.00	EA
Nov-01-13	Initial review of Minutes with Court's Decision; Interoffice conference with FAF re same.	0.20	0.00	EA
	Totals	78.10	\$24,005.00	

DISBURSEMENTS

	Photocopies	428.75
	Postage	12.42
May-02-13	E-Filing and processing Fee - Motion	10.00
May-03-13	E-Filing and processing Fee - Certificate of Mailing	10.00
May-06-13	E-Filing and processing Fee - Schedule Arrearages	10.00
May-07-13	E-Filing and processing Fee - Financial Disclosure Form	10.00
May-17-13	E-Filing and processing Fee - Certificate of Mailing	10.00
May-29-13	E-Filing and processing Fee - Certificate of Mailing	10.00
May-30-13	E-Filing and processing Fee - Supplemental Certificate of Service	10.00
May-31-13	E-Filing and processing Fee - Reply to Counterclaim	10.00
Jun-13-13	E-Filing and processing Fee - Order regarding Passport	10.00
Jun-14-13	E-Filing and processing Fee - Witness List	10.00
Jun-17-13	E-Filing and processing Fee - Notice of Entry of Order re Passport	10.00

Jul-11-13	E-Filing and processing Fee - Order to Show Cause	10.00
Jul-15-13	E-Filing and processing Fee - Order	10.00
Jul-16-13	Clerk Fee for Certified Documents	5.00
	E-Filing and processing Fee - Notice of Entry of Order to Show Cause	10.00
Jul-19-13	E-Filing and processing Fee - Notice of Entry of Order	10.00
Jul-23-13	Mileage Expense	9.60
Jul-24-13	Mileage Expense	10.10
	E-Filing and processing Fee - Proof of Service	10.00
	E-Filing and processing Fee - Acceptance of Service	10.00
Aug-06-13	Mileage Expense	10.00
	E-Filing and processing Fee - Motion and Ex Parte Application	10.00
	E-Filing and processing Fee - Order Shortening Time	10.00
	E-Filing and processing Fee - Receipt of Copy	10.00
Aug-08-13	E-Filing and processing Fee - Notice of Entry of Order Shortening Time	10.00
	E-Filing and processing Fee - Receipt of Copy	10.00
Aug-13-13	E-Filing and processing Fee - Consent Order	10.00
Aug-19-13	Clerk Fee for Certified Documents	5.00
Aug-22-13	Mileage Expense	18.00
	E-Filing and processing Fee - Notice of Entry of Consent Order	10.00
	E-Filing and processing Fee - Pre-Evidentiary Hearing Brief	10.00
	E-Filing and processing Fee - Receipt of Copy	10.00
Aug-28-13	Mileage Expense	18.00
	E-Filing and processing Fee - Schedule of Arrearages	10.00
	E-Filing and processing Fee - receipt of Copy	10.00
Aug-29-13	Mileage Expense	17.00
Sep-17-13	E-Filing and processing Fee - Discovery	10.00
	Commissioner Report and Recommendation	
Sep-24-13	E-Filing and processing Fee - Notice of Entry of Discovery Commissioner	10.00
Oct-08-13	Parking meter/fee	4.00
	Totals	<hr/> \$837.87

Total Fee & Disbursements for all charges on this matter

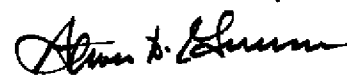
\$24,842.87

PAYMENT DETAILS

Apr-26-13	Payment for invoice: 8455	1,070.00
May-24-13	Payment for invoice: 8547	2,049.18
Jun-26-13	Payment for invoice: 8647	2,230.82
Jul-31-13	Payment on Account	4,850.96
Oct-31-13	Payment on Account - Mastercard	1,000.00
Total Payments		<hr/> \$11,200.96

TRUST STATEMENT

		Disbursements	Receipts
Feb-19-13	Received From: Maria Perdomo Retainer Payment - Mastercard		350.00
Mar-22-13	Received From: Maria Perdomo Retainer Payment - Visa		5,000.00
Apr-26-13	Paid To: The Fine Law Group Payment for invoice: 8455	1,070.00	
May-24-13	Paid To: The Fine Law Group Payment for invoice: 8547	2,049.18	
Jun-26-13	Paid To: The Fine Law Group Payment for invoice: 8647	2,230.82	
Jul-31-13	Received From: Maria Perdomo Retainer Payment - Visa		4,925.96
	Paid To: Corporate Intelligence International Process server - Service of OSC	75.00	
	Paid To: The Fine Law Group Payment on Account	4,850.96	
Total Trust		\$10,275.96	\$10,275.96
Trust Balance			\$0.00



CLERK OF THE COURT

1 ORDER
2 The Fine & Price Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 Suite 5
6 8975 South Pecos Road
7 Henderson, Nevada 89074
8 Telephone: 702/384-8900
9 Facsimile: 702/384-6900
10 fran@thefinelawgroup.com
11 Attorney for Plaintiff
12 MARIA DANIELA LEWIS nka
13 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,)
11 MARIA DANIELA PERDOMO,)
12)
13 Plaintiff;) CASE NO: D-10-427054-D
14 v.) DEPT NO: T
15)
16 WESLEY ALLEN LEWIS,) DATES OF HEARING: 10-8-13
17) TIME OF HEARING: 9:00 a.m.
18 Defendant.)
19)

20 Findings Of Fact, Conclusions Of Law And Order

21 THIS MATTER having come before the Court for Evidentiary
22 Hearing on August 28, 2013 and concluding on October 8, 2013 before
23 the Honorable Gayle Nathan; Plaintiff appearing personally and
24 through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price
25 Law Group; Defendant appearing personally and through his attorney,
26 PATRICIA A. MARR, ESQ., of Patricia A. Marr, Ltd; The Court having
27 considered the testimony of witnesses, the exhibits admitted at
28 trial, and the arguments of counsel; The matter having been
submitted for decision and the Court having issued its Minute Order
on October 14, 2013, the Court hereby makes the following findings
of fact, conclusions of law and orders:

✓
/ / /

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DEC 02 2013

FAMILY COURT
DEPARTMENT T

FINDINGS OF FACT

1
2 1. That the parties were divorced pursuant to a Decree
3 Of Divorce filed on July 15, 2011. In said Decree the parties were
4 awarded joint legal and joint physical custody of their minor
5 child, to-wit: ISABELLA SARA LEWIS (hereafter "BELLA"), born on
6 August 10, 2006.

7 2. That the Court had previously in its Order filed on
8 July 15, 2013, set aside the Master's Recommendation And Order in
9 Case No. R-11-161532-R inasmuch as the arrears set by that Court
10 did not accurately reflect the correct arrears based upon the child
11 support that Defendant was ordered to pay.

12 3. That for the period from June 2011 through August
13 2013 Defendant's child support obligation was in the amount of
14 \$440.00 per month for each and every month save and except the
15 three months of June, July and August of 2011. For those three
16 months, Defendant's child support obligation was \$307.00 per month.

17 4. That From June 2011 forward, Defendant maintained
18 health insurance to cover the parties' minor child for only the
19 months of June, July and August of 2011. Accordingly, it was only
20 in those three months that Defendant was entitled to a \$133.00 per
21 month offset against his \$440.00 per month child support
22 obligation.

23 5. That Defendant's total child support arrears,
24 exclusive of interest and penalties, up to and including August
25 2013 are in the amount of \$9,012.38.

26 6. That Defendant's testimony that he is working only
27 26 hours per week so that he can care for the parties' minor child,
28 Bella, on his days off is not compelling to the Court as Bella is

1 now in her second year of elementary school (albeit repeating the
2 first grade).

3 7. That there was no testimony that Defendant was
4 physically or mentally impaired or disabled or unable to work.

5 8. That Defendant has a duty to financially support his
6 daughter by working a full time job as the mother of his child
7 does, and it was apparent from the testimony and other evidence
8 that he does not meet his financial obligations working 26 hours
9 per week. Based upon Defendant's continuing failure since 2011 to
10 pay his court ordered child support on a consistently monthly
11 basis, 26 hours of work per week is not sufficient to meet the
12 financial needs of his child.

13 9. That the Court accepts Plaintiff's testimony that
14 she has, at times, worked three jobs to support herself and Bella.

15 10. Whether Defendant chooses to work 40 hours per week
16 is up to him. However, the Court finds that he is wilfully
17 underemployed and is imputing another 16 hours of wages at this
18 time.

19 11. That a review of Defendant's pay stubs reflects that
20 he is paid an hourly wage of \$9.00 per hour and is paid commission
21 as well. Although his July and August 2013 pay stubs do not
22 reflect commission, his May 2013 pay stubs reflect commission.
23 Additionally, on the pay stub for pay date August 2, 2013
24 Defendant's year-to-date for commissions was \$3,069.00, resulting
25 in an average of \$438.42 per month in commission income. The Court
26 will calculate 40 hours per week at \$9.00 per hour for a gross
27 monthly salary of \$1,560.00, plus \$438.42 commissions, in arriving
28 at an imputed total gross monthly income of \$1,998.00 for

1 Defendant.

2 12. Plaintiff's gross monthly income is \$1,495.00.
3 Eighteen percent of that is \$269.00. Defendant's imputed gross
4 monthly income is \$1,998.00. Eighteen percent of that is \$360.00.

5 13. That the Court declines to modify Defendant's
6 current child support obligation retroactive to August 2012 when he
7 made application to have his child support reviewed in Child
8 Support Court. Therefore commencing October 2013 Defendant's
9 current child support obligation to Plaintiff shall be \$91.00 per
10 month.

11 14. That Plaintiff maintains health insurance to cover
12 the parties' minor child at a cost to her of \$100.00 per month, for
13 which Defendant shall have one-half responsibility.

14 15. That on the issue of credibility, Defendant
15 testified on several issues where the Court found his credibility
16 suspect, or that he was motivated to act in a manner that was
17 contrary to the best interest of his minor child, as reflected by
18 the following:

19 A. Defendant testified that his current income was
20 \$900.00 per month. The Court found his income to be, at
21 a minimum \$1,481.00 per month, when looking at the year-
22 to-date on his pay stubs (noting that the calculation
23 used to set child support uses his hours on 40 hours and
24 a sum that is equal to his average monthly commission as
25 his gross monthly). The Court finds that his testimony,
26 on his gross monthly income was not credible as it was
27 not support by the math in an analysis of his pay stubs.

24 B. Defendant testified that Plaintiff moved in with
25 someone he didn't know which "affected" him and that it
26 was hard for him to handle. The Court finds that he was
27 motivated to not cooperate or co-parent or pay his child
28 support based upon his feelings toward this third party
and Plaintiff's new relationship.

C. The Court did not find Defendant credible when he
testified that he sits down for 2 hours every day to go

1 over his first grade daughter's homework with her.

2 D. The Court did not find Defendant credible when he
3 testified that he did not know Bella was in gymnastics
4 classes or mini-cheer. It defies the Court's
5 understanding of children that Bella did not want to show
6 off her tumbling and cheer skills to her Daddy.
7 Additionally, Defendant testified that he was asked to
8 buy cheer shoes for Bella and he declined to do so. He
9 was invited to events involving cheer/gymnastics but did
10 not attend. All of this testimony undermined his
11 credibility.

12 16. That Plaintiff paid Ms. Flores, Bella's teacher last
13 school year, for eight tutoring sessions for Bella.

14 17. That Bella's attendance at the Kuman Tutoring Class
15 that is paid for by Plaintiff on Mondays immediately after school
16 is in Bella's best interest.

17 18. That the Court has concerns about co-parenting
18 issues that were not before it. These include Defendant not
19 charging Bella's telephone so that Plaintiff has daily access to
20 her daughter; Defendant not bringing Bella to Kuman Tutoring that
21 Plaintiff is paying \$200.00 per month for; Defendant ignoring the
22 activities that Plaintiff has Bella involved in and not sharing
23 with Plaintiff the activities he has Bella involved in. For these
24 reasons, Defendant is cautioned to actively engage in co-parenting
25 with Plaintiff.

26 19. That Defendant has lived with his parents since
27 August of 2012, and hence has built-in daycare when needed.
28 Defendant's rent is listed at \$300.00 per month. The Court infers
that it is unlikely Defendant would be evicted if he was late or
missed a rent payment. The Court finds that Defendant's monthly
expenses are minimal.

20. That Defendant is found to be contempt of court for

1 his non-payment of child support as follows: In 2011, for June,
2 July, August and September; In 2012, for January, May, June, July,
3 September, October and November.

4 21. That Defendant is responsible for some if not all of
5 Plaintiff's attorney fees.

6 22. That both counsel meet the *Brunzell* factors.

7 23. That Plaintiff's counsel is experienced in the
8 practice of family law and is of good professional standing. It
9 is hereby found that Plaintiff's counsel performed extensive pre-
10 evidentiary hearing preparation and said preparation and
11 performance at the evidentiary hearing was conducted in a
12 professional and thorough manner. Plaintiff is the "prevailing
13 party" as to the major issues addressed at the evidentiary hearing.

14 24. That Plaintiff incurred a total of \$24,842.87 in
15 attorney fees and costs in this post-divorce litigation through the
16 drafting of Plaintiff's Memorandum Of Fees And Costs filed on
17 November 7, 2013.

18 25. It is in Bella's best interest, and an appropriate
19 expense under NRS 125B.080(k) that both parties share in the cost
20 of Bella's tutoring as she is currently being serviced through
21 Kuman Tutoring.

22 26. Plaintiff has paid for Bella's tutoring for October
23 2013.

24 27. That if any Finding Of Fact is more properly
25 determined to be a Conclusion Of Law, then same shall be the case.

26 **CONCLUSIONS OF LAW**

27 1. That NRS 125.510 affords the Court with the
28 authority "during the pendency of the action, at the final hearing

1 or at any time thereafter during he minority of any of the children
2 of the marriage, make such an order the custody, care, education,
3 maintenance and support of the minor children as appears in their
4 best interest."

5 2. That NRS 125.180 provides that "when either party to
6 an action for divorce, makes default in paying any sum of money as
7 required by the judgment or order directing the payment thereof,
8 the district may make an order directing entry of judgment of the
9 amount of such arrears, together with costs and a reasonable
10 attorney's fees."

11 3. That NRS 22.010 provides that "disobedience or
12 resistance to any lawful writ, order, rule or process issued by the
13 court of judge at chambers" constitutes an "act or omission" which
14 shall be deemed a contempt.

15 4. EDCR 7.60 provides that when a party "fails or
16 refuses to comply with any order of a judge of the court",
17 sanctions may be imposed "including the imposition of fines, costs
18 or attorney's fees".

19 5. In view of the parties' joint legal and joint
20 physical custody of BELLA, the current child support obligation is
21 governed by NRS Chapter 125B and *Wesley v. Foster*, 119 Nev. 110, 65
22 P.3d 251 (2003)

23 6. That if any Conclusion Of Law is more property
24 determined to be a Finding Of Fact, then same shall be the case.

25 Now, therefore, by reason of the foregoing,

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1 IT IS FURTHER ORDERED that the Court declines to set
2 aside the child support order of 2011 that set Defendant's child
3 support obligation at \$440.00 per month or to make this Order
4 retroactive to August 2012 when Defendant made application to have
5 his child support reviewed in Child Support Court.

6 IT IS FURTHER ORDERED that (as Welfare is on this case)
7 the Family Support Division of the Clark County District Attorney's
8 Office in Case No. R-11-161532-R obtain a new judgment in favor of
9 Plaintiff against Defendant consistent with this Order, to-wit:
10 that Defendant was ordered to pay \$440.00 monthly in child support;
11 he was afforded an offset of \$133.00 for insurance, thus his child
12 support for the months of June, July and August of 2011 only is set
13 at \$307.00 per month. For each and every month thereafter through
14 August 2013 Defendant's current child support obligation was
15 \$440.00 per month; total child support arrears, exclusive of
16 interest and penalties, through August 2013 is \$9012.38.

17 IT IS FURTHER ORDERED that, commencing October 2013,
18 Defendant shall pay current child support to Plaintiff in the
19 amount of \$91.00.

20 IT IS FURTHER ORDERED that Plaintiff shall continue to
21 maintain health insurance to cover BELLA with a present cost of
22 same in the amount of \$100.00. Defendant shall pay to Plaintiff
23 one-half the cost of BELLA's health insurance, or currently \$50.00
24 per month.

25 IT IS FURTHER ORDERED that once the Family Support
26 Division of the Clark County District Attorney's Office calculates
27 Defendant's child support arrears, including interest and
28 penalties, Defendant shall pay to Plaintiff the sum of \$100.00 per

1 month on the arrears until paid in full.

2 **IT IS FURTHER ORDERED** that commencing October 2013
3 Defendant shall pay Plaintiff a total of \$241.00 per month
4 consisting of \$91.00 current child support, \$50.00 contribution
5 towards BELLA's health insurance cost, and \$100.00 for child
6 support arrears.

7 **IT IS FURTHER ORDERED** that Defendant shall pay Plaintiff
8 the full \$241.00 in October by October 31, 2013. Commencing
9 November 2013 and continuing until there is a wage assignment in
10 place, Defendant may pay to Plaintiff \$120.50 on the 5th day of the
11 month and \$120.50 on the 20th day of the month. A failure by
12 Defendant to make any one payment is a contempt of court, and
13 Plaintiff may submit an Order To Show Cause with a supporting
14 Affidavit/Declaration detailing the missed payment(s) to obtain an
15 evidentiary hearing regarding contempt.

16 **IT IS FURTHER ORDERED** that Defendant is held in contempt
17 of court for his non-payment of child support as follows: In 2011,
18 for June, July, August, September; In 2012, for January, May, June,
19 July, September, October and November.

20 **IT IS FURTHER ORDERED** that Defendant is sanctioned by the
21 sum of \$500.00 for each of his eleven contempts set forth in the
22 preceding paragraph for a total sanction of \$5,500.00. Said sum is
23 reduced to judgment in favor of Plaintiff and may be collected by
24 any and all lawful means. The Court is also imposing a 10 day jail
25 sentence for each of the eleven contempts for a total sentence of
26 110 days. Said jail sentence is stayed, but will be imposed in the
27 event that Defendant has any future missed payments to Plaintiff.

28 **IT IS FURTHER ORDERED** that Plaintiff be awarded the sum

1 of \$15,000 as and for attorney fees and costs, with said sum
2 reduced to judgment in favor of Plaintiff and collected by any and
3 all lawful means.

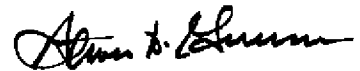
4 DATED this 20th day of December, 2013.

5
6
7 DISTRICT COURT JUDGE J.K.

8 GAYLE NATHAN
9

10 Submitted by:

11 Frances-Ann Fine
12 The Fine & Price Law Group
13 FRANCES-ANN FINE, ESQ.
14 Nevada Bar No. 0025
Attorney for Plaintiff
15 MARIA DANIELA PERDOMO
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CLERK OF THE COURT

NEOJ
THE FINE & PRICE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT. NO. T
vs.)	
WESLEY ALLEN LEWIS,)	
Defendant.)	

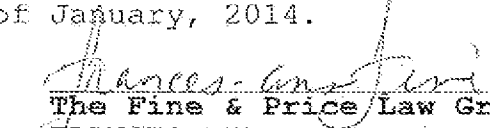
NOTICE OF ENTRY OF FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

TO: WESLEY ALLEN LEWIS, Defendant; and

TO: PATRICIA A. MARR, ESQUIRE, Attorney for Defendant:

YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an
FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER, a copy of which is
attached hereto, was entered and filed in the above-entitled matter
on the 27th day of December, 2013.

DATED the 3rd day of January, 2014.

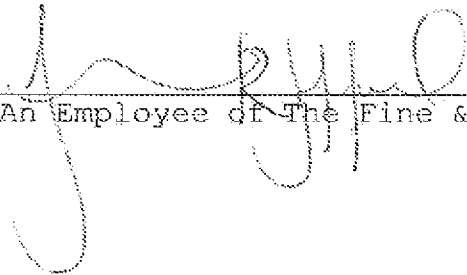


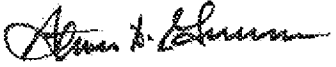
The Fine & Price Law Group
FRANCES-ANN FINE, ESQUIRE
8975 S. Pecos Road, Ste. 5
Henderson, Nevada 89074
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

1 CERTIFICATE OF MAILING

2 I hereby certify that on this 10th day of January, 2014,
3 a copy of the foregoing NOTICE OF ENTRY OF FINDINGS OF FACT,
4 CONCLUSIONS OF LAW AND ORDER was placed into the United States
5 Mail, first class postage prepaid at Las Vegas, Nevada, addressed
6 to:

7 Patricia A. Marr, Esq.
8 Patricia A. Marr, Ltd.
9 4305 Dean Martin Dr., Ste. #185
10 Las Vegas, Nevada 89103

11 
12 An Employee of The Fine & Price Law Group
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


CLERK OF THE COURT

1 ORDER
2 The Fine & Price Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 Suite 5
6 8975 South Pecos Road
7 Henderson, Nevada 89074
8 Telephone: 702/384-8900
9 Facsimile: 702/384-6900
10 fran@thefinelawgroup.com
11 Attorney for Plaintiff
12 MARIA DANIELA LEWIS nka
13 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,)
11 MARIA DANIELA PERDOMO,)
12)
13 Plaintiff;) CASE NO: D-10-427054-D
14 v.) DEPT NO: T
15)
16 WESLEY ALLEN LEWIS,) DATES OF HEARING: 10-8-13
17) TIME OF HEARING: 9:00 a.m.
18 Defendant.)
19)

20 Findings Of Fact, Conclusions Of Law And Order

21 THIS MATTER having come before the Court for Evidentiary
22 Hearing on August 28, 2013 and concluding on October 8, 2013 before
23 the Honorable Gayle Nathan; Plaintiff appearing personally and
24 through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price
25 Law Group; Defendant appearing personally and through his attorney,
26 PATRICIA A. MARR, ESQ., of Patricia A. Marr, Ltd; The Court having
27 considered the testimony of witnesses, the exhibits admitted at
28 trial, and the arguments of counsel; The matter having been
submitted for decision and the Court having issued its Minute Order
on October 14, 2013, the Court hereby makes the following findings
of fact, conclusions of law and orders:

✓
/ / /

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DEC 02 2013

FAMILY COURT
DEPARTMENT T

FINDINGS OF FACT

1
2 1. That the parties were divorced pursuant to a Decree
3 Of Divorce filed on July 15, 2011. In said Decree the parties were
4 awarded joint legal and joint physical custody of their minor
5 child, to-wit: ISABELLA SARA LEWIS (hereafter "BELLA"), born on
6 August 10, 2006.

7 2. That the Court had previously in its Order filed on
8 July 15, 2013, set aside the Master's Recommendation And Order in
9 Case No. R-11-161532-R inasmuch as the arrears set by that Court
10 did not accurately reflect the correct arrears based upon the child
11 support that Defendant was ordered to pay.

12 3. That for the period from June 2011 through August
13 2013 Defendant's child support obligation was in the amount of
14 \$440.00 per month for each and every month save and except the
15 three months of June, July and August of 2011. For those three
16 months, Defendant's child support obligation was \$307.00 per month.

17 4. That From June 2011 forward, Defendant maintained
18 health insurance to cover the parties' minor child for only the
19 months of June, July and August of 2011. Accordingly, it was only
20 in those three months that Defendant was entitled to a \$133.00 per
21 month offset against his \$440.00 per month child support
22 obligation.

23 5. That Defendant's total child support arrears,
24 exclusive of interest and penalties, up to and including August
25 2013 are in the amount of \$9,012.38.

26 6. That Defendant's testimony that he is working only
27 26 hours per week so that he can care for the parties' minor child,
28 Bella, on his days off is not compelling to the Court as Bella is

1 now in her second year of elementary school (albeit repeating the
2 first grade).

3 7. That there was no testimony that Defendant was
4 physically or mentally impaired or disabled or unable to work.

5 8. That Defendant has a duty to financially support his
6 daughter by working a full time job as the mother of his child
7 does, and it was apparent from the testimony and other evidence
8 that he does not meet his financial obligations working 26 hours
9 per week. Based upon Defendant's continuing failure since 2011 to
10 pay his court ordered child support on a consistently monthly
11 basis, 26 hours of work per week is not sufficient to meet the
12 financial needs of his child.

13 9. That the Court accepts Plaintiff's testimony that
14 she has, at times, worked three jobs to support herself and Bella.

15 10. Whether Defendant chooses to work 40 hours per week
16 is up to him. However, the Court finds that he is wilfully
17 underemployed and is imputing another 16 hours of wages at this
18 time.

19 11. That a review of Defendant's pay stubs reflects that
20 he is paid an hourly wage of \$9.00 per hour and is paid commission
21 as well. Although his July and August 2013 pay stubs do not
22 reflect commission, his May 2013 pay stubs reflect commission.
23 Additionally, on the pay stub for pay date August 2, 2013
24 Defendant's year-to-date for commissions was \$3,069.00, resulting
25 in an average of \$438.42 per month in commission income. The Court
26 will calculate 40 hours per week at \$9.00 per hour for a gross
27 monthly salary of \$1,560.00, plus \$438.42 commissions, in arriving
28 at an imputed total gross monthly income of \$1,998.00 for

1 Defendant.

2 12. Plaintiff's gross monthly income is \$1,495.00.
3 Eighteen percent of that is \$269.00. Defendant's imputed gross
4 monthly income is \$1,998.00. Eighteen percent of that is \$360.00.

5 13. That the Court declines to modify Defendant's
6 current child support obligation retroactive to August 2012 when he
7 made application to have his child support reviewed in Child
8 Support Court. Therefore commencing October 2013 Defendant's
9 current child support obligation to Plaintiff shall be \$91.00 per
10 month.

11 14. That Plaintiff maintains health insurance to cover
12 the parties' minor child at a cost to her of \$100.00 per month, for
13 which Defendant shall have one-half responsibility.

14 15. That on the issue of credibility, Defendant
15 testified on several issues where the Court found his credibility
16 suspect, or that he was motivated to act in a manner that was
17 contrary to the best interest of his minor child, as reflected by
18 the following:

19 A. Defendant testified that his current income was
20 \$900.00 per month. The Court found his income to be, at
21 a minimum \$1,481.00 per month, when looking at the year-
22 to-date on his pay stubs (noting that the calculation
23 used to set child support uses his hours on 40 hours and
a sum that is equal to his average monthly commission as
his gross monthly). The Court finds that his testimony,
on his gross monthly income was not credible as it was
not support by the math in an analysis of his pay stubs.

24 B. Defendant testified that Plaintiff moved in with
25 someone he didn't know which "affected" him and that it
26 was hard for him to handle. The Court finds that he was
27 motivated to not cooperate or co-parent or pay his child
support based upon his feelings toward this third party
and Plaintiff's new relationship.

28 C. The Court did not find Defendant credible when he
testified that he sits down for 2 hours every day to go

1 over his first grade daughter's homework with her.

2 D. The Court did not find Defendant credible when he
3 testified that he did not know Bella was in gymnastics
4 classes or mini-cheer. It defies the Court's
5 understanding of children that Bella did not want to show
6 off her tumbling and cheer skills to her Daddy.
7 Additionally, Defendant testified that he was asked to
8 buy cheer shoes for Bella and he declined to do so. He
9 was invited to events involving cheer/gymnastics but did
10 not attend. All of this testimony undermined his
11 credibility.

12 16. That Plaintiff paid Ms. Flores, Bella's teacher last
13 school year, for eight tutoring sessions for Bella.

14 17. That Bella's attendance at the Kuman Tutoring Class
15 that is paid for by Plaintiff on Mondays immediately after school
16 is in Bella's best interest.

17 18. That the Court has concerns about co-parenting
18 issues that were not before it. These include Defendant not
19 charging Bella's telephone so that Plaintiff has daily access to
20 her daughter; Defendant not bringing Bella to Kuman Tutoring that
21 Plaintiff is paying \$200.00 per month for; Defendant ignoring the
22 activities that Plaintiff has Bella involved in and not sharing
23 with Plaintiff the activities he has Bella involved in. For these
24 reasons, Defendant is cautioned to actively engage in co-parenting
25 with Plaintiff.

26 19. That Defendant has lived with his parents since
27 August of 2012, and hence has built-in daycare when needed.
28 Defendant's rent is listed at \$300.00 per month. The Court infers
that it is unlikely Defendant would be evicted if he was late or
missed a rent payment. The Court finds that Defendant's monthly
expenses are minimal.

20. That Defendant is found to be contempt of court for

his non-payment of child support as follows: In 2011, for June, July, August and September; In 2012, for January, May, June, July, September, October and November.

21. That Defendant is responsible for some if not all of Plaintiff's attorney fees.

22. That both counsel meet the *Brunzell* factors.

23. That Plaintiff's counsel is experienced in the practice of family law and is of good professional standing. It is hereby found that Plaintiff's counsel performed extensive pre-evidentiary hearing preparation and said preparation and performance at the evidentiary hearing was conducted in a professional and thorough manner. Plaintiff is the "prevailing party" as to the major issues addressed at the evidentiary hearing.

24. That Plaintiff incurred a total of \$24,842.87 in attorney fees and costs in this post-divorce litigation through the drafting of Plaintiff's Memorandum Of Fees And Costs filed on November 7, 2013.

25. It is in Bella's best interest, and an appropriate expense under NRS 125B.080(k) that both parties share in the cost of Bella's tutoring as she is currently being serviced through Kuman Tutoring.

26. Plaintiff has paid for Bella's tutoring for October 2013.

27. That if any Finding Of Fact is more properly determined to be a Conclusion Of Law, then same shall be the case.

CONCLUSIONS OF LAW

1. That NRS 125.510 affords the Court with the authority "during the pendency of the action, at the final hearing

1 or at any time thereafter during he minority of any of the children
2 of the marriage, make such an order the custody, care, education,
3 maintenance and support of the minor children as appears in their
4 best interest."

5 2. That NRS 125.180 provides that "when either party to
6 an action for divorce, makes default in paying any sum of money as
7 required by the judgment or order directing the payment thereof,
8 the district may make an order directing entry of judgment of the
9 amount of such arrears, together with costs and a reasonable
10 attorney's fees."

11 3. That NRS 22.010 provides that "disobedience or
12 resistance to any lawful writ, order, rule or process issued by the
13 court of judge at chambers" constitutes an "act or omission" which
14 shall be deemed a contempt.

15 4. EDCR 7.60 provides that when a party "fails or
16 refuses to comply with any order of a judge of the court",
17 sanctions may be imposed "including the imposition of fines, costs
18 or attorney's fees".

19 5. In view of the parties' joint legal and joint
20 physical custody of BELLA, the current child support obligation is
21 governed by NRS Chapter 125B and *Wesley v. Foster*, 119 Nev. 110, 65
22 P.3d 251 (2003)

23 6. That if any Conclusion Of Law is more property
24 determined to be a Finding Of Fact, then same shall be the case.

25 Now, therefore, by reason of the foregoing,

26 / / /

27 / / /

28 / / /

ORDER

IT IS HEREBY ORDERED both parties shall equally share in the cost of BELLA's tutoring, currently with Kuman Tutoring. Since Plaintiff paid for tutoring in October 2013, Defendant shall bear the cost of her tutoring for November 2013. Commencing in December 2013, the parties will each pay one-half the month's tutoring expense by the due date for said payment.

IT IS FURTHER ORDERED that Defendant shall take BELLA to her Kuman Tutoring class on Mondays immediately after school. BELLA shall continue to receive tutoring services until she is testing at or above grade level as tested by Kuman (or if Kuman does test, by the CRT's administered by the Clark County School District), or if Plaintiff and Defendant mutually decide to terminate the tutoring. If BELLA is testing at or above grade level and one parent wishes to continue the tutoring, that shall be at that parent's sole expense. If BELLA needs tutoring again in the future, based upon her grades or a teacher recommendation, the cost of that tutoring will be equally borne by the parties.

IT IS FURTHER ORDERED that the Court declines to award to Plaintiff any costs she has borne in the past for BELLA's extracurricular activities or the cell phone.

IT IS FURTHER ORDERED that Plaintiff's request that the parties equally bear the cost of gymnastics and cheer or any other recreational activity is denied.

IT IS FURTHER ORDERED that, other than tutoring, the parties shall not enroll BELLA in an activity during the other parent's timeshare without that parent's written agreement to the activity.

1 IT IS FURTHER ORDERED that the Court declines to set
2 aside the child support order of 2011 that set Defendant's child
3 support obligation at \$440.00 per month or to make this Order
4 retroactive to August 2012 when Defendant made application to have
5 his child support reviewed in Child Support Court.

6 IT IS FURTHER ORDERED that (as Welfare is on this case)
7 the Family Support Division of the Clark County District Attorney's
8 Office in Case No. R-11-161532-R obtain a new judgment in favor of
9 Plaintiff against Defendant consistent with this Order, to-wit:
10 that Defendant was ordered to pay \$440.00 monthly in child support;
11 he was afforded an offset of \$133.00 for insurance, thus his child
12 support for the months of June, July and August of 2011 only is set
13 at \$307.00 per month. For each and every month thereafter through
14 August 2013 Defendant's current child support obligation was
15 \$440.00 per month; total child support arrears, exclusive of
16 interest and penalties, through August 2013 is \$9012.38.

17 IT IS FURTHER ORDERED that, commencing October 2013,
18 Defendant shall pay current child support to Plaintiff in the
19 amount of \$91.00.

20 IT IS FURTHER ORDERED that Plaintiff shall continue to
21 maintain health insurance to cover BELLA with a present cost of
22 same in the amount of \$100.00. Defendant shall pay to Plaintiff
23 one-half the cost of BELLA's health insurance, or currently \$50.00
24 per month.

25 IT IS FURTHER ORDERED that once the Family Support
26 Division of the Clark County District Attorney's Office calculates
27 Defendant's child support arrears, including interest and
28 penalties, Defendant shall pay to Plaintiff the sum of \$100.00 per

1 month on the arrears until paid in full.

2 **IT IS FURTHER ORDERED** that commencing October 2013
3 Defendant shall pay Plaintiff a total of \$241.00 per month
4 consisting of \$91.00 current child support, \$50.00 contribution
5 towards BELLA's health insurance cost, and \$100.00 for child
6 support arrears.

7 **IT IS FURTHER ORDERED** that Defendant shall pay Plaintiff
8 the full \$241.00 in October by October 31, 2013. Commencing
9 November 2013 and continuing until there is a wage assignment in
10 place, Defendant may pay to Plaintiff \$120.50 on the 5th day of the
11 month and \$120.50 on the 20th day of the month. A failure by
12 Defendant to make any one payment is a contempt of court, and
13 Plaintiff may submit an Order To Show Cause with a supporting
14 Affidavit/Declaration detailing the missed payment(s) to obtain an
15 evidentiary hearing regarding contempt.


16 **IT IS FURTHER ORDERED** that Defendant is held in contempt
17 of court for his non-payment of child support as follows: In 2011,
18 for June, July, August, September; In 2012, for January, May, June,
19 July, September, October and November.

20 **IT IS FURTHER ORDERED** that Defendant is sanctioned by the
21 sum of \$500.00 for each of his eleven contempts set forth in the
22 preceding paragraph for a total sanction of \$5,500.00. Said sum is
23 reduced to judgment in favor of Plaintiff and may be collected by
24 any and all lawful means. The Court is also imposing a 10 day jail
25 sentence for each of the eleven contempts for a total sentence of
26 110 days. Said jail sentence is stayed, but will be imposed in the
27 event that Defendant has any future missed payments to Plaintiff.

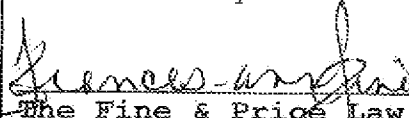
28 **IT IS FURTHER ORDERED** that Plaintiff be awarded the sum

1 of \$15,000 as and for attorney fees and costs, with said sum
2 reduced to judgment in favor of Plaintiff and collected by any and
3 all lawful means.

4 DATED this 20th day of December, 2013.

5
6 
7 DISTRICT COURT JUDGE G. N.
8 **GAYLE NATHAN**

9
10 Submitted by:

11 
12 The Fine & Price Law Group
13 FRANCES-ANN FINE, ESQ.
14 Nevada Bar No. 0025
Attorney for Plaintiff
15 MARIA DANIELA PERDOMO

1 ORDER

The Fine & Price Law Group

2 FRANCES-ANN FINE, ESQ.

Nevada Bar No. 0025

3 Suite 5

8975 South Pecos Road

4 Henderson, Nevada 89074

Telephone: 702/384-8900

5 Facsimile: 702/384-6900

fran@thefinelawgroup.com

6 Attorney for Plaintiff

MARIA DANIELA LEWIS nka

7 MARIA DANIELA PERDOMO

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,
11 MARIA DANIELA PERDOMO,

Plaintiff;

12 v.

13 WESLEY ALLEN LEWIS,

14 Defendant.

) CASE NO: D-10-427054-D

) DEPT NO: T

) DATES OF HEARING: 10-8-13

) TIME OF HEARING: 9:00 a.m.

15 Findings Of Fact, Conclusions Of Law And Order

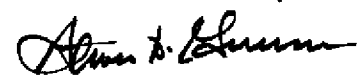
16 THIS MATTER having come before the Court for Evidentiary
17 Hearing on August 28, 2013 and concluding on October 8, 2013 before
18 the Honorable Gayle Nathan; Plaintiff appearing personally and
19 through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price
20 Law Group; Defendant appearing personally and through his attorney,
21 PATRICIA A. MARR, ESQ., of Patricia A. Marr, Ltd; The Court having
22 considered the testimony of witnesses, the exhibits admitted at
23 trial, and the arguments of counsel; The matter having been
24 submitted for decision and the Court having issued its Minute Order
25 on October 14, 2013, the Court hereby makes the following findings
26 of fact, conclusions of law and orders:

27 / / /

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DEC 02 2013

FAMILY COURT
DEPARTMENT 7



CLERK OF THE COURT

EXPT
THE FINE & PRICE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT. NO. T
vs.)	
)	DATE OF HEARING:
WESLEY ALLEN LEWIS,)	TIME OF HEARING:
)	
Defendant.)	

EX PARTE APPLICATION FOR ORDER SHORTENING TIME

COMES NOW Plaintiff, MARIA PERDOMO, by and through her attorney, FRANCES-ANN FINE, ESQUIRE, of The Fine & Price Law Group, and moves this Court for an order shortening the time for hearing on Plaintiff's Motion To Modify Custody; to Enforce Order of December 27, 2013 and an Award of Attorney's Fees

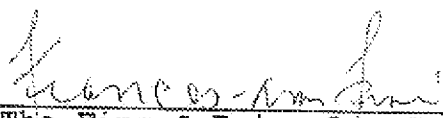
This motion is made and based upon all papers and pleadings on file herein, Points and Authorities submitted herewith, and exhibits attached hereto.

/ / /

/ / /

1 herewith, and exhibits attached hereto.

2 DATED this 19 day of March, 2014.

3
4 
5 The Fine & Price Law Group
6 FRANCES-ANN FINE, ESQUIRE
7 Nevada Bar No. 0025
8 Attorney for Plaintiff
9 MARIA PERDOMO

10 POINTS AND AUTHORITIES

11 EDCR 5.31 provides as follows:

12 "Rule 2.26 applies to motions to shorten time in the
13 family division."

14 EDCR 2.26 provides as follows:

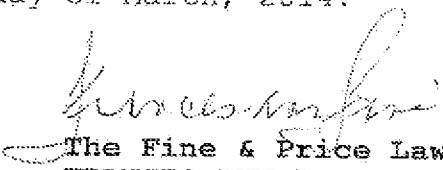
15 "Ex parte motions to shorten time may not be
16 granted except upon an affidavit or certificate of
17 counsel describing the circumstances claimed to
18 constitute good cause and justify shortening of time.
19 If a motion to shorten time is granted, it must be
20 served upon all parties promptly. An order which
21 shortens the notice of a hearing to less than 10 days
22 may not be served by mail.

23 As is set forth in Counsel's Declaration attached hereto
24 and incorporated herein by reference, and the underlying Motion
25 which is attached as **Exhibit "1"**, Defendant ("WESLEY") has failed
26 and continues to fail to comply with any of the orders of this
27 court, or to co-parent with the Plaintiff, often ignoring the minor
28 child's medical, psychological and educational needs.

29 Counsel for the Plaintiff is concerned that once the
30 Defendant is served with this Motion and is threatened with further
31 restrictions to his relationship with his daughter, that the
32 child's best interests could be compromised. For that reason, it
33 is respectfully requested that this matter be heard on an Order
34 Shortening Time.

1 Based upon the foregoing, it is respectfully submitted
2 that good cause has been shown to justify the shortening of time
3 for the hearing on Plaintiff's Motion To Modify Custody, For An
4 Order To Show Cause Why Defendant Should Not be Held In Contempt of
5 Court and for Attorney's Fees and Costs.

6 DATED this 19 day of March, 2014.

7
8 
9 The Fine & Price Law Group
10 FRANCES-ANN FINE, ESQUIRE
11 Nevada Bar No. 0025
12 Attorneys for Plaintiff
13 MARIA PERDOMO

14 DECLARATION OF COUNSEL

15 FRANCES-ANN FINE, declares as follows:

- 16 1. I am an attorney duly licensed to practice law in the State of
17 Nevada. I make this Declaration based upon my own personal
18 knowledge except as to those matters stated upon information
19 and belief, and as to those matters I believe them to be true.
20 2. I am the retained counsel for Plaintiff, MARIA PERDOMO.
21 3. Since our last hearing in this matter where explicit
22 instructions were provided to the Defendant of what he must do
23 and when, he has failed completely.
24 4. Defendant's behavior has caused the minor child to be
25 neglected educationally, medically and psychologically and for
26 those reasons, it is unclear the mental balance of the
27 Defendant.

28 DATED this 19th day of September, 2013.


FRANCES-ANN FINE

EXHIBIT "1"

1 MOT
2 THE FINE & PRICE LAW GROUP
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA PERDOMO

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

9 MARIA DANIELA LEWIS nka)
10 MARIA DANIELA PERDOMO,)
11 Plaintiff,) CASE NO. D-10-427054-D
12 vs.) DEPT. NO. T
13 WESLEY ALLEN LEWIS,)
14 Defendant.)

15 Motion To Modify Custody; to Enforce Order of
16 December 27, 2013 and an Award of Attorney's Fees

17 NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION/COUNTERMOTION
18 WITH THE CLERK OF THE COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS
19 MOTION/COUNTERMOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE
20 COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION/COUNTERMOTION MAY
21 RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR
22 TO THE SCHEDULED HEARING DATE.

20 COMES NOW Plaintiff, MARIA DANIELA PERDOMO (formerly
21 known as MARIA DANIELA LEWIS), by and through her attorney,
22 FRANCES-ANN FINE, ESQ., of The Fine & Price Law Group, and moves
23 this Court for the following relief:

24 (1) For an award of primary physical custody of the
25 parties' minor child;

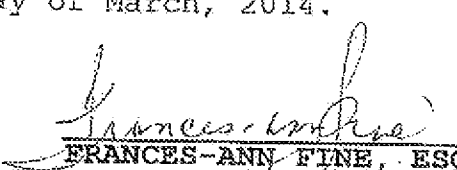
26 (2) To enforce the Order of December 27, 2013; and

27 (3) For an award of attorney's fees and costs.

28 This Motion is made and based upon all papers and

1 pleadings on file herein, Points And Authorities submitted
2 herewith, Plaintiff's attached affidavit, and such further evidence
3 and argument as may be adduced at the hearing of this motion.

4 DATED this 19th day of March, 2014.

5
6 
7 FRANCES-ANN FINE, ESQUIRE
8 Nevada Bar No. 25
9 The Fine & Price Law Group
10 Attorneys for Plaintiff
11 MARIA DANIELA PERDOMO

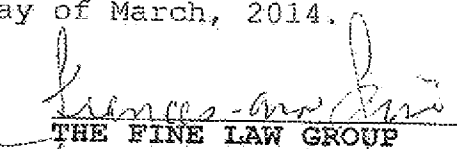
12 NOTICE OF MOTION

13 TO: WESLEY ALLEN LEWIS, Defendant;

14 TO: PATRICIA MARR, ESQ., Attorney for Defendant:

15 YOU WILL PLEASE TAKE NOTICE that the undersigned will
16 bring Plaintiff's Motion To Modify Custody; For An Order To Show
17 Cause Why Defendant Should Not Be Held In Contempt of Court and an
18 Award of Attorney's Fees on for hearing before the above-entitled
19 Court on:

20 DATED this 19th day of March, 2014.

21 
22 THE FINE LAW GROUP
23 FRANCES-ANN FINE, ESQ.
24 Nevada Bar No. 0025
25 Attorney for Plaintiff
26 MARIA DANIELA PERDOMO

27 POINTS AND AUTHORITIES

28 I. FACTS

Plaintiff (hereafter "Maria") and Defendant (hereafter
"Wesley") were last before this Court on October 8, 2013 for
evidentiary hearing. After two days of proceedings, this Court
carefully analyzed the testimony and evidence presented and made

1 detailed findings and specific orders regarding the parties'
2 financial responsibilities, co-parenting issues and payment plans
3 for existing sums owed. The Court's findings, conclusions and
4 orders were formalized in the *Findings of Fact, Conclusions of Law*
5 and Order filed on December 27, 2013. **Exhibit 1.**

6 Wesley had refused to abide by a single order of this
7 Court in the five months since the evidentiary hearing, both as a
8 co-parent and financially.

9 The Court indicated in its Order that if the Defendant
10 failed to comply with any of her orders that an automatic Order to
11 Show Cause would issue. Hence, an Order to Show Cause is being
12 supplied to this Court for signature, to be heard on the date and
13 time of the underlying motion to change custody.

14 Defendant's open defiance of the orders of this Court
15 since the October 8, 2013 evidentiary hearing and the filing of the
16 Findings of Fact, Conclusions of Law and Order filed on the 27th day
17 of December, 2013 are clearly offensive and NOT in the best
18 interests of the minor child herein.

19 What is even more troubling is Wesley's continued refusal
20 to communicate and co-parent with Maria. Isabella's cellular
21 telephone remains unavailable when Maria attempts to call.
22 Homework is not being completed during Wesley's custodial time and
23 Isabella is now missing school because "she needs to care for her
24 sick father." Wesley continues to sleep with the child each night,
25 despite his assurances that he has prepared a separate room for
26 her.

27 What is truly offensive, is that Wesley is neglecting
28 Isabella's health needs and refusing to follow the directives of

1 her healthcare providers during his custodial time.

2 As stated during the evidentiary hearing, Maria hoped
3 that Wesley would truly hear the words and admonishments of the
4 Court. She sincerely hoped that a change in custody would not be
5 needed following the extensive previous litigation and specific
6 orders of the Court. However, matters have only become worse and
7 Isabella has now been diagnosed with a generalized anxiety
8 disorder. Wesley will not participate in treatment despite the
9 specific requests of her counselor. Isabella is not progressing
10 academically due to Wesley's failure to complete homework
11 assignments with her during his custodial days. She has suffered
12 through strep throat and a progressive rash without treatment due
13 to Wesley's refusal to take Isabella to the doctor or comply with
14 the doctor's instructions. At this juncture, Maria must request a
15 formal change in custody due to Wesley's obstinance and direct
16 disregard of their daughter's best interests.

17 Regarding the financial issues, Defendant was
18 specifically ordered to commence the following payments on or
19 before October 30, 2013:

20 (1) One-half of the tutoring for the minor child at
21 Kumon's (\$200.00 is owed) to be paid directly to Kumon;

22 (2) Child support in the amount of \$91.00 per
23 month;

24 (3) One-half of health insurance in the amount of
25 \$50.00 per month; and

26 (4) An arrears payment of \$100.00 per month.

27 Not one penny was received in October, November,
28 December, January or February. In fact, Plaintiff only learned

1 that Defendant made the following payments:

2 (A) On March 2, 2014 the sum of \$200.00 was
3 received by at Family Support; and

4 (B) On March 13, 2014 the sum of \$113.23 was taken
5 out of Wesley's paycheck.

6 Wesley should have paid to Kumon \$200.00. Additionally,
7 he was to pay the sum of \$546.00 as and for child support from
8 October, 2013 through March, 2014 at \$91.00 per month.
9 Additionally, he should have paid the sum of \$300.00 as and for
10 one-half of the health insurance premium that Maria has been
11 paying; and finally he was to pay on the arrears, whether or not
12 they had been determined by the Family Support Division, the sum of
13 \$600.00.

14 Summarily, Wesley is now in further arrears of \$532.77 on
15 the current monies owed since October of 2013. This figure is
16 arrived at by taking the money he should have paid commencing in
17 October, again \$91.00 a month for child support or \$546.00 plus
18 \$50.00 a month for health insurance for six month or \$300.00 a
19 month for a total of \$846.00 minus what was just received on March
20 2, 2014 and March 13, 2014, or \$313.23 which leaves an additional
21 arrearage of \$532.77, plus the previously ordered arrears. Wesley
22 has simply "thumbed his nose" at these arrears.

23 Maria has taken the most recent order to Family Support
24 and requested them to comply with this Honorable Court's directive
25 of calculating a new and updated arrears amount pursuant to her
26 order including the full amount of child support, rather than the
27 amount of child support minus the health insurance offset. This
28 was done since Wesley only had insurance for three months with

1 which to offset, and the previous schedule offset the health
2 insurance for the entire amount of time.

3 In a nutshell, other than \$313.23 Wesley is not providing
4 on a timely basis child support, health insurance, arrears or
5 tutoring. His arrears remain completely unpaid, despite the
6 monthly payment plan specifically ordered by the Court.

7 II. CUSTODY

8 As specifically set forth above, there is clear and
9 convincing evidence that there is a necessity to immediately change
10 custody of the minor child at issue.

11 The parties currently share joint physical custody of
12 Isabella.

13 Pursuant to Truax v. Truax, 110 Nev. 437, 438-39, 874
14 P.2d 10, 11 (1994) and NRS 125.510(2), a joint physical custody
15 arrangement may be modified or terminated by the court upon a
16 showing that it is in the child's best interest. At this juncture,
17 it is clearly in Isabella's best interest to remain in Maria's
18 primary physical custody. Isabella's educational success, health
19 care needs and struggles with mental health issues requires such a
20 modification.

21 Regarding Isabella's academics, the Court will recall
22 that she is already repeating the first grade due to her
23 educational struggles. Maria established regular communications
24 with her classroom teacher (Mrs. Burgess) and set up private
25 tutoring through Kumon. Wesley is not completing the homework
26 assignments from Kumon during his custodial time and therefore her
27 progress has not been as anticipated by the director of Kumon,
28 Scott Nuha. **Exhibit 3.** Isabella has similarly not consistently

1 completed her mandatory homework assignments for Twitchell
2 Elementary and her unfinished homework assignments continue to be
3 an area of concern with her teacher. **Exhibit 4.** Isabella's
4 performance in math has dropped significantly in January, a
5 specific academic problem area for her. **Exhibit 5.** Furthermore,
6 Isabella reported to her teacher that she was absent from school
7 because "dad was sick and she had to take care of him." **Exhibit 6.**

8 These academic issues have been compounded by Isabella's
9 emotional and behavioral troubles, which have also impacted her
10 school performance. Isabella is showing signs of anger and
11 emotional instability, lack of attention in class, having a
12 difficult time concentrating, biting herself, and hitting/kicking
13 other classmates. **Exhibit 7.** Wesley refused to communicate with
14 Maria regarding Isabella's absences or homework issues.

15 In September of 2013, Isabella started therapy at Oasis
16 Counseling Center. Her psychotherapist, Mr. Warren Wheatley,
17 immediately noted signs of depression and recommended regularly
18 weekly sessions. Wesley has been invited and encouraged to attend
19 these appointments since September 28, 2013, but he has not
20 responded to the requests of either Maria or Isabella's therapist.
21 Mr. Warren has diagnose Isabella with a generalized anxiety
22 disorder, and Wesley's refusal to participate in her treatment, is
23 detailed in his letter dated February 19, 2014. **Exhibit 7.**

24 Isabella's physical health has also suffered since the
25 last Court proceedings. Wesley has been invited to attend every
26 medical appointment made for Isabella so that he is aware of her
27 condition and each doctor's recommendations for her care. **Exhibit**
28 **8.** In January of 2014, Isabella had flu symptoms combined with a

1 general rash all over her body. Upon picking Isabella up from
2 school and noting her condition, Maria immediately made an
3 appointment with Dr. Dominic LaRocco at St. Rose Pediatrics.
4 Isabella was diagnosed with Eczema and instructions were provided
5 to decrease all skin irritants (utilize hypo-allergenic
6 soaps/detergents, no softeners/dryer sheets, short 2 minute
7 showers, no baths). **Exhibit 9.** Wesley was informed about her skin
8 condition and detailed treatment instructions were sent to him via
9 e-mail. **Exhibit 10.** Wesley did not follow these directions, which
10 caused Isabella significant emotional distress. **Exhibit 7.**

11 On January 29, 2014, Maria was informed by Isabella's
12 teacher (not by Wesley) that Isabella was absent from school.
13 Wesley did not inform Maria about the absence and he did not answer
14 his telephone call when she attempted to find out what was going
15 on. Isabella did not answer her telephone, either. Maria was
16 finally able to reach Isabella's grandfather, who explained that
17 Isabella was not feeling well, she had a sore throat, and was
18 having flu symptoms. It was apparent when Maria picked Isabella up
19 from school the following day that she was a really sick little
20 girl. A trip to the pediatrician confirmed that Isabella had strep
21 throat which required immediate antibiotics. **Exhibit 11.** It
22 remains unclear why Wesley ignored her significant symptoms which
23 clearly required a doctor's intervention.

24 Finally, Wesley has continued his pattern of non-
25 communication and refusal to co-parent or cooperate with Maria in
26 any manner. Maria has notified Wesley about doctor's appointments,
27 extracurricular activities, vacation plans, address changes,
28 Isabella's behavior and emotional issues, school performance, and

1 any other relevant topics concerning their daughter's health and
2 well-being. **Exhibit 12.** This has been predominantly one-way
3 communication, with Wesley rarely answering e-mails. He does not
4 give any feedback regarding Isabella's performance or well-being,
5 his vacation plans or activities that she is involved in during his
6 custodial time. He continues to fail to charge Isabella's cellular
7 phone in the evenings to prevent the child's direct communication
8 with Maria.

9 As an example, on February 26, 2014, Isabella was again
10 absent from school. Maria learned of the absence (again) from
11 Isabella's teacher. Maria tried to contact Isabella multiple times
12 without success, and also tried Wesley's home and cellular
13 telephone. Wesley called several hours later and stated that his
14 car had broken down, which was why Isabella had missed school. He
15 did not sound right and Maria could hear Isabella crying in the
16 background. Maria offered to pick Isabella up that evening to
17 ensure that she made it to school the next day, but Wesley refused
18 and accused Maria of trying to control the situation. When Maria
19 went to the house to confirm that Isabella was alright, no one was
20 home and Wesley continued to not answer Maria's calls. The police
21 were called to do a well-check on Isabella and they saw Wesley
22 driving by his home, apparently to avoid their visit. The officers
23 chased him down and escorted him back into the residence. They
24 explained to Wesley that he needed to communicate with Maria to
25 avoid situations like this. Wesley refused to allow Maria any
26 contact with Isabella to ensure she was alright.

27 It is respectfully submitted that a modification of
28 custody is now required to meet Isabella's educational, medical and

1 mental health needs. Wesley has been repeatedly ordered to
2 communicate with Maria, appropriately co-parent and put his
3 daughter's well-being above his own personal feelings towards
4 Maria. He simply cannot do so. Further Court orders requiring him
5 to parent Isabella appropriately can not be expected to fix the
6 situation, as he refuses to follow the multiple orders already in
7 place.

8 III. CONTEMPT

9 NRS 1.210(3) states that "[t]he Court has the power to
10 compel obedience to its orders," and NRS 22.010(3) provides that
11 "[t]he refusal to abide by a lawful order issued by the Court is
12 contempt."

13 NRS 22.100 provides:

14 Upon the answer and the evidence taken, the Court or
15 Judge or jury, as the case may be, shall determine
16 whether the person proceeded against is guilty of the
17 contempt charged, and if it be found that he is guilty of
18 the contempt, a fine may be imposed upon him not
19 exceeding \$500, or he may be imprisoned not exceeding 25
20 days, or both, but no imprisonment shall exceed 25 days
21 except as provided in NRS 22.110.

22 Plaintiff does not want the Defendant to go to jail. It
23 is not in the best interests of the minor child to know that her
24 father is being punished for his contempt, but Plaintiff does not
25 know how to otherwise get his attention. She is hopeful that this
26 Honorable Court can otherwise determine what an appropriate
27 sanction should be.

28 A. WESLEY HAS NOT PAID HIS ONE-HALF SHARE OF ISABELLA'S TUTORING

The Findings of Fact, Conclusions of Law and Order filed
on December 27, 2013 provides as follows:

IT IS HEREBY ORDERED both parties shall equally share in
the cost of BELLA's tutoring, currently with Kuman

1 Tutoring. Since Plaintiff paid for tutoring in October
2 2013, Defendant shall bear the cost of her tutoring for
3 November 2013. Commencing in December 2013, the parties
will each pay one-half the month's tutoring expense by
the due date for said payment.

4 Wesley has not made a single payment towards Isabella's tutoring
5 with Kumon. He did not pay the full \$200.00 monthly payment for
6 November, 2013, and he has not paid \$100.00 per month pursuant to
7 the Court's order for December, January, February or March. Maria
8 has paid 100% of these expenses without reimbursement. Exhibit 2.
9 Each of these non-payments constitutes a separate act of contempt
10 of this Court's orders.

11 **B. WESLEY HAD NOT MADE A TIMELY CHILD SUPPORT PAYMENT**

12 The *Findings of Fact, Conclusions of Law and Order* filed
13 on December 27, 2013 provides as follows:

14 **IT IS FURTHER ORDERED** that, commencing October 2013,
15 Defendant shall pay current child support to Plaintiff in
the amount of \$91.00.

16 Wesley had made no payment of \$91.00 pursuant to this Court's order
17 and only in March was there a payment made. Said payment was not
18 designated as anything, so we can only assume it was a partial
19 payment on the new arrears. He is, therefore, in contempt, at
20 least, for the months of October, November, December, January and
21 February. Maria requests a finding of contempt and sanctions for
22 each violation.

23 **C. WESLEY HAS NOT CONTRIBUTED TO THE COST OF THE CHILD'S MEDICAL
24 INSURANCE COVERAGE**

25 The *Findings of Fact, Conclusions of Law and Order* filed
26 on December 27, 2013 provides as follows:

27 **IT IS FURTHER ORDERED** that Plaintiff shall continue to
28 maintain health insurance to cover BELLA with a present
cost of same in the amount of \$100.00. Defendant shall
pay to Plaintiff one-half the cost of BELLA's health

1 insurance, or currently \$50.00 per month.

2 As with his other financial obligations to Isabella, Wesley had not
3 made a single payment towards the cost of the child's medical
4 insurance coverage. Hence \$300.00 would have been due and should
5 have been paid, but nothing was paid until March of 2014. This is
6 an additional at least either five (5) or six (6) acts (however,
7 the court wishes to characterize the minimal payments) of contempt
8 to be adjudicated by the Court.

9 **D. WESLEY HAS NOT MADE A SINGLE PAYMENT TOWARDS HIS CHILD SUPPORT**
10 **ARREARS**

11 *The Findings of Fact, Conclusions of Law and Order* filed
12 on December 27, 2013 provides as follows:

13 **IT IS FURTHER ORDERED** that once the Family Support
14 Division of the Clark County District Attorney's Office
15 calculates Defendant's child support arrears, including
interest and penalties, Defendant shall pay to Plaintiff
the sum of \$100.00 per month on the arrears until paid in
full.

16 Again, Wesley has not made any payment on any of his obligations
17 under the Court's order, including the payment towards his existing
18 arrears. This is an additional six (6) acts of contempt to be
19 adjudicated by the Court.

20 **E. SANCTIONS REQUESTED - EXPEDITED PROCEEDINGS AND IMPOSITION OF**
21 **WESLEY'S SUSPENDED SENTENCE**

22 This Court specifically detailed the potential
23 consequences of Wesley's continued defiance of judicial orders. He
24 was made aware that his failure to make:

25 "[A]ny one payment is a contempt of court, and Plaintiff
26 may submit an Order To Show Cause with a supporting
Affidavit/Declaration detailing the missed payment(s) to
obtain an evidentiary hearing regarding contempt."

27 *Exhibit 1, page 10.* Furthermore, the suspended incarceration for
28 his previous contemptuous acts would be imposed in the event of any

1 further missed payments:

2 **IT IS FURTHER ORDERED** that Defendant is sanctioned by the
3 sum of \$500.00 for each of his eleven contempts set forth
4 in the preceding paragraph for a total sanction of
5 \$5,500.00. Said sum is reduced to judgment in favor of
6 Plaintiff and may be collected by any and all lawful
7 means. The Court is also imposing a 10 day jail sentence
8 for each of the eleven contempts for a total sentence of
9 110 days. Said jail sentence is stayed, but will be
10 imposed in the event that Defendant has any future missed
11 payments to Plaintiff.

12 Maria respectfully requests this court enforce the previous
13 contempts in whatever manner she believes is just, but is not
14 certain that jail will benefit anyone. He will lose his job and
15 the ability to pay any monies. It certainly will not be in the
16 best interests of the child when she learns that her father, who
17 she continues to love, in spite of his neglect was incarcerated
18 because of her.

19 Plaintiff requests that there be expedited proceedings
20 based upon Welsey's continued non-payment.

21 Finally, Wesley has failed to pay any monies whatsoever
22 toward the attorney's fee award of \$15,000.00 and for that contempt
23 should also issue.

24 **IV. ATTORNEY'S FEES**

25 NRS 22.100 (3) provides that, in addition to the
26 penalties provided in NRS 22.100 (2) a party found in contempt of
27 court may be ordered to pay to the party seeking to enforce an
28 order that party's attorneys fees. EDCR 7.60 provides that a court
may impose as sanctions attorney fees and costs when a party "fails
or refuses to comply with an order of a judge of the court."
Additionally, NRS 125.180 specifically authorizes the awarding of

1 attorney fees and costs in addition to a judgment for arrears.

2 Based upon the foregoing authority, it is respectfully
3 requested that Maria be awarded a judgment against Wesley for her
4 attorney fees and costs incurred in the instant litigation, subject
5 to the filing of a *Brunzell* Affidavit setting forth the amount of
6 said fees as well as the other factors addressed in that case.

7 DATED this 19th day of March, 2014.

8
9 
10 The Fine Law Group
11 FRANCES-ANN FINE, ESQ.
12 Nevada Bar No. 0025
13 Attorney for Plaintiff
14 MARIA DANIELA PERDOMO

12 AFFIDAVIT OF MARIA DANIELA PERDOMO

13 STATE OF NEVADA)
14) ss.
15 COUNTY OF CLARK)

15 MARIA DANIELA PERDOMO, being first duly sworn, does
16 depose and state as follows:

17 1. I am the Plaintiff in the above-captioned matter,
18 and make this affidavit based upon my own personal knowledge except
19 as to those matters stated upon information and belief, and as to
20 those matters I believe them to be true.

21 2. I have reviewed the contents of this motion to which
22 this affidavit is attached, and attest that the facts stated
23 therein are true and correct.

24 3. My major concern is the best interests of our
25 daughter are not being met with the current custodial order and I
26 request this Court to comply with the standards represented in the
27 cases cited by my counsel in allowing for me to be designated as
28 the Primary Physical Custodian.

1 4. I further request that on the days that the
2 Defendant will have Isabella in his care that there be restrictions
3 to monitor her health and well-being as designated by her health
4 care providers and that if that does not occur, that he be granted
5 only supervised visitation.

6 5. Specifically, relating to the Order to Show Cause
7 issues addressed herein, Wesley has failed to pay for his one-half
8 share of Isabella's: (1) tutoring costs, (2) health insurance
9 premium, (3) his monthly child support obligation, and (4) his
10 monthly payment towards existing child support arrears. I do not
11 request Defendant be incarcerated, but I do request some
12 appropriate sanction or he will continue to ignore the Orders of
13 this Court. Since the date of our evidentiary hearing, Wesley has
14 paid only \$313.23 towards these court-ordered obligations.

15 Further Affiant sayeth naught.

16
17 
18 MARIA DANIELA PERDOMO

19 SUBSCRIBED AND SWORN to before
20 me this 19 day of March, 2014

21 
22 Notary Public 

Exhibit “1”


CLERK OF THE COURT

1 ORDER
2 The Fine & Price Law Group
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 Suite 5
6 8975 South Pecos Road
7 Henderson, Nevada 89074
8 Telephone: 702/384-8900
9 Facsimile: 702/384-6900
10 fran@thefinelawgroup.com
11 Attorney for Plaintiff
12 MARIA DANIELA LEWIS nka
13 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

10 MARIA DANIELA LEWIS, nka,)
11 MARIA DANIELA PERDOMO,)
12)
13 Plaintiff;) CASE NO: D-10-427054-D
14 v.) DEPT NO: T
15)
16 WESLEY ALLEN LEWIS,) DATES OF HEARING: 10-8-13
17) TIME OF HEARING: 9:00 a.m.
18 Defendant.)
19)

Findings Of Fact, Conclusions Of Law And Order

20 THIS MATTER having come before the Court for Evidentiary
21 Hearing on August 28, 2013 and concluding on October 8, 2013 before
22 the Honorable Gayle Nathan: Plaintiff appearing personally and
23 through her attorney, FRANCES-ANN FINE, ESQ., of The Fine & Price
24 Law Group; Defendant appearing personally and through his attorney,
25 PATRICIA A. MARR, ESQ., of Patricia A. Marr, Ltd; The Court having
26 considered the testimony of witnesses, the exhibits admitted at
27 trial, and the arguments of counsel; The matter having been
28 submitted for decision and the Court having issued its Minute Order
on October 14, 2013, the Court hereby makes the following findings
of fact, conclusions of law and orders:

✓
/ / /

RECEIVED

DEC 02 2013

FAMILY COURT
DEPARTMENT 7

FINDINGS OF FACT

1
2 1. That the parties were divorced pursuant to a Decree
3 Of Divorce filed on July 15, 2011. In said Decree the parties were
4 awarded joint legal and joint physical custody of their minor
5 child, to-wit: ISABELLA SARA LEWIS (hereafter "BELLA"), born on
6 August 10, 2006.

7 2. That the Court had previously in its Order filed on
8 July 15, 2013, set aside the Master's Recommendation And Order in
9 Case No. R-11-161532-R inasmuch as the arrears set by that Court
10 did not accurately reflect the correct arrears based upon the child
11 support that Defendant was ordered to pay.

12 3. That for the period from June 2011 through August
13 2013 Defendant's child support obligation was in the amount of
14 \$440.00 per month for each and every month save and except the
15 three months of June, July and August of 2011. For those three
16 months, Defendant's child support obligation was \$307.00 per month.

17 4. That From June 2011 forward, Defendant maintained
18 health insurance to cover the parties' minor child for only the
19 months of June, July and August of 2011. Accordingly, it was only
20 in those three months that Defendant was entitled to a \$133.00 per
21 month offset against his \$440.00 per month child support
22 obligation.

23 5. That Defendant's total child support arrears,
24 exclusive of interest and penalties, up to and including August
25 2013 are in the amount of \$9,012.38.

26 6. That Defendant's testimony that he is working only
27 26 hours per week so that he can care for the parties' minor child,
28 Bella, on his days off is not compelling to the Court as Bella is

1 now in her second year of elementary school (albeit repeating the
2 first grade).

3 7. That there was no testimony that Defendant was
4 physically or mentally impaired or disabled or unable to work.

5 8. That Defendant has a duty to financially support his
6 daughter by working a full time job as the mother of his child
7 does, and it was apparent from the testimony and other evidence
8 that he does not meet his financial obligations working 26 hours
9 per week. Based upon Defendant's continuing failure since 2011 to
10 pay his court ordered child support on a consistently monthly
11 basis, 26 hours of work per week is not sufficient to meet the
12 financial needs of his child.

13 9. That the Court accepts Plaintiff's testimony that
14 she has, at times, worked three jobs to support herself and Bella.

15 10. Whether Defendant chooses to work 40 hours per week
16 is up to him. However, the Court finds that he is wilfully
17 underemployed and is imputing another 16 hours of wages at this
18 time.

19 11. That a review of Defendant's pay stubs reflects that
20 he is paid an hourly wage of \$9.00 per hour and is paid commission
21 as well. Although his July and August 2013 pay stubs do not
22 reflect commission, his May 2013 pay stubs reflect commission.
23 Additionally, on the pay stub for pay date August 2, 2013
24 Defendant's year-to-date for commissions was \$3,069.00, resulting
25 in an average of \$438.42 per month in commission income. The Court
26 will calculate 40 hours per week at \$9.00 per hour for a gross
27 monthly salary of \$1,560.00, plus \$438.42 commissions, in arriving
28 at an imputed total gross monthly income of \$1,998.00 for

1 Defendant.

2 12. Plaintiff's gross monthly income is \$1,495.00.
3 Eighteen percent of that is \$269.00. Defendant's imputed gross
4 monthly income is \$1,998.00. Eighteen percent of that is \$360.00.

5 13. That the Court declines to modify Defendant's
6 current child support obligation retroactive to August 2012 when he
7 made application to have his child support reviewed in Child
8 Support Court. Therefore commencing October 2013 Defendant's
9 current child support obligation to Plaintiff shall be \$91.00 per
10 month.

11 14. That Plaintiff maintains health insurance to cover
12 the parties' minor child at a cost to her of \$100.00 per month, for
13 which Defendant shall have one-half responsibility.

14 15. That on the issue of credibility, Defendant
15 testified on several issues where the Court found his credibility
16 suspect, or that he was motivated to act in a manner that was
17 contrary to the best interest of his minor child, as reflected by
18 the following:

19 A. Defendant testified that his current income was
20 \$900.00 per month. The Court found his income to be, at
21 a minimum \$1,481.00 per month, when looking at the year-
22 to-date on his pay stubs (noting that the calculation
23 used to set child support uses his hours on 40 hours and
24 a sum that is equal to his average monthly commission as
25 his gross monthly). The Court finds that his testimony,
26 on his gross monthly income was not credible as it was
27 not support by the math in an analysis of his pay stubs.

24 B. Defendant testified that Plaintiff moved in with
25 someone he didn't know which "affected" him and that it
26 was hard for him to handle. The Court finds that he was
27 motivated to not cooperate or co-parent or pay his child
28 support based upon his feelings toward this third party
and Plaintiff's new relationship.

C. The Court did not find Defendant credible when he
testified that he sits down for 2 hours every day to go

1 over his first grade daughter's homework with her.

2 D. The Court did not find Defendant credible when he
3 testified that he did not know Bella was in gymnastics
4 classes or mini-cheer. It defies the Court's
5 understanding of children that Bella did not want to show
6 off her tumbling and cheer skills to her Daddy.
7 Additionally, Defendant testified that he was asked to
8 buy cheer shoes for Bella and he declined to do so. He
9 was invited to events involving cheer/gymnastics but did
10 not attend. All of this testimony undermined his
11 credibility.

12 16. That Plaintiff paid Ms. Flores, Bella's teacher last
13 school year, for eight tutoring sessions for Bella.

14 17. That Bella's attendance at the Kuman Tutoring Class
15 that is paid for by Plaintiff on Mondays immediately after school
16 is in Bella's best interest.

17 18. That the Court has concerns about co-parenting
18 issues that were not before it. These include Defendant not
19 charging Bella's telephone so that Plaintiff has daily access to
20 her daughter; Defendant not bringing Bella to Kuman Tutoring that
21 Plaintiff is paying \$200.00 per month for; Defendant ignoring the
22 activities that Plaintiff has Bella involved in and not sharing
23 with Plaintiff the activities he has Bella involved in. For these
24 reasons, Defendant is cautioned to actively engage in co-parenting
25 with Plaintiff.

26 19. That Defendant has lived with his parents since
27 August of 2012, and hence has built-in daycare when needed.
28 Defendant's rent is listed at \$300.00 per month. The Court infers
that it is unlikely Defendant would be evicted if he was late or
missed a rent payment. The Court finds that Defendant's monthly
expenses are minimal.

20. That Defendant is found to be contempt of court for

1 his non-payment of child support as follows: In 2011, for June,
2 July, August and September; In 2012, for January, May, June, July,
3 September, October and November.

4 21. That Defendant is responsible for some if not all of
5 Plaintiff's attorney fees.

6 22. That both counsel meet the Brunzell factors.

7 23. That Plaintiff's counsel is experienced in the
8 practice of family law and is of good professional standing. It
9 is hereby found that Plaintiff's counsel performed extensive pre-
10 evidentiary hearing preparation and said preparation and
11 performance at the evidentiary hearing was conducted in a
12 professional and thorough manner. Plaintiff is the "prevailing
13 party" as to the major issues addressed at the evidentiary hearing.

14 24. That Plaintiff incurred a total of \$24,842.87 in
15 attorney fees and costs in this post-divorce litigation through the
16 drafting of Plaintiff's Memorandum Of Fees And Costs filed on
17 November 7, 2013.

18 25. It is in Bella's best interest, and an appropriate
19 expense under NRS 125B.080(k) that both parties share in the cost
20 of Bella's tutoring as she is currently being serviced through
21 Kuman Tutoring.

22 26. Plaintiff has paid for Bella's tutoring for October
23 2013.

24 27. That if any Finding Of Fact is more properly
25 determined to be a Conclusion Of Law, then same shall be the case.

26 CONCLUSIONS OF LAW

27 1. That NRS 125.510 affords the Court with the
28 authority "during the pendency of the action, at the final hearing

1 or at any time thereafter during he minority of any of the children
2 of the marriage, make such an order the custody, care, education,
3 maintenance and support of the minor children as appears in their
4 best interest."

5 2. That NRS 125.180 provides that "when either party to
6 an action for divorce, makes default in paying any sum of money as
7 required by the judgment or order directing the payment thereof,
8 the district may make an order directing entry of judgment of the
9 amount of such arrears, together with costs and a reasonable
10 attorney's fees."

11 3. That NRS 22.010 provides that "disobedience or
12 resistance to any lawful writ, order, rule or process issued by the
13 court of judge at chambers" constitutes an "act or omission" which
14 shall be deemed a contempt.

15 4. EDCR 7.60 provides that when a party "fails or
16 refuses to comply with any order of a judge of the court",
17 sanctions may be imposed "including the imposition of fines, costs
18 or attorney's fees".

19 5. In view of the parties' joint legal and joint
20 physical custody of BELLA, the current child support obligation is
21 governed by NRS Chapter 125B and *Wesley v. Foster*, 119 Nev, 110, 65
22 P.3d 251 (2003)

23 6. That if any Conclusion Of Law is more properly
24 determined to be a Finding Of Fact, then same shall be the case.

25 Now, therefore, by reason of the foregoing,

26 / / /

27 / / /

28 / / /

1 IT IS FURTHER ORDERED that the Court declines to set
2 aside the child support order of 2011 that set Defendant's child
3 support obligation at \$440.00 per month or to make this Order
4 retroactive to August 2012 when Defendant made application to have
5 his child support reviewed in Child Support Court.

6 IT IS FURTHER ORDERED that (as Welfare is on this case)
7 the Family Support Division of the Clark County District Attorney's
8 Office in Case No. R-11-161532-R obtain a new judgment in favor of
9 Plaintiff against Defendant consistent with this Order, to-wit:
10 that Defendant was ordered to pay \$440.00 monthly in child support;
11 he was afforded an offset of \$133.00 for insurance, thus his child
12 support for the months of June, July and August of 2011 only is set
13 at \$307.00 per month. For each and every month thereafter through
14 August 2013 Defendant's current child support obligation was
15 \$440.00 per month; total child support arrears, exclusive of
16 interest and penalties, through August 2013 is \$9012.38.

17 IT IS FURTHER ORDERED that, commencing October 2013,
18 Defendant shall pay current child support to Plaintiff in the
19 amount of \$91.00.

20 IT IS FURTHER ORDERED that Plaintiff shall continue to
21 maintain health insurance to cover BELLA with a present cost of
22 same in the amount of \$100.00. Defendant shall pay to Plaintiff
23 one-half the cost of BELLA's health insurance, or currently \$50.00
24 per month.

25 IT IS FURTHER ORDERED that once the Family Support
26 Division of the Clark County District Attorney's Office calculates
27 Defendant's child support arrears, including interest and
28 penalties, Defendant shall pay to Plaintiff the sum of \$100.00 per

1 month on the arrears until paid in full.

2 IT IS FURTHER ORDERED that commencing October 2013
3 Defendant shall pay Plaintiff a total of \$241.00 per month
4 consisting of \$91.00 current child support, \$50.00 contribution
5 towards BELLA's health insurance cost, and \$100.00 for child
6 support arrears.

7 IT IS FURTHER ORDERED that Defendant shall pay Plaintiff
8 the full \$241.00 in October by October 31, 2013. Commencing
9 November 2013 and continuing until there is a wage assignment in
10 place, Defendant may pay to Plaintiff \$120.50 on the 5th day of the
11 month and \$120.50 on the 20th day of the month. A failure by
12 Defendant to make any one payment is a contempt of court, and
13 Plaintiff may submit an Order To Show Cause with a supporting
14 Affidavit/Declaration detailing the missed payment(s) to obtain an
15 evidentiary hearing regarding contempt.

16 IT IS FURTHER ORDERED that Defendant is held in contempt
17 of court for his non-payment of child support as follows: In 2011,
18 for June, July, August, September; In 2012, for January, May, June,
19 July, September, October and November.

20 IT IS FURTHER ORDERED that Defendant is sanctioned by the
21 sum of \$500.00 for each of his eleven contempts set forth in the
22 preceding paragraph for a total sanction of \$5,500.00. Said sum is
23 reduced to judgment in favor of Plaintiff and may be collected by
24 any and all lawful means. The Court is also imposing a 10 day jail
25 sentence for each of the eleven contempts for a total sentence of
26 110 days. Said jail sentence is stayed, but will be imposed in the
27 event that Defendant has any future missed payments to Plaintiff.

28 IT IS FURTHER ORDERED that Plaintiff be awarded the sum

1 of ~~\$~~15,000 as and for attorney fees and costs, with said sum
2 reduced to judgment in favor of Plaintiff and collected by any and
3 all lawful means.

4 DATED this 20th day of December, 2013.

5
6
7 DISTRICT COURT JUDGE J. H.

8 GAYLE NATHAN
9

10 Submitted by:

11 Frances-Ann Fine
12 The Fine & Price Law Group
13 FRANCES-ANN FINE, ESQ.
14 Nevada Bar No. 0025
15 Attorney for Plaintiff
16 MARIA DANIELA PERDOMO
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit “2”

KUMON

Name T. Schreller Lewis

Registration Fee _____ \$ _____

Monthly Tuition _____ \$ 200

TUITION FOR YEAR

JANUARY	FEBRUARY	MARCH
Date Received _____	Date Received _____	Date Received _____
<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____	<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____	<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____
Amount Paid: \$ _____	Amount Paid: \$ _____	Amount Paid: \$ _____
Balance Due: \$ _____	Balance Due: \$ _____	Balance Due: \$ _____
APRIL	MAY	JUNE
Date Received _____	Date Received _____	Date Received _____
<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____	<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____	<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____
Amount Paid: \$ _____	Amount Paid: \$ _____	Amount Paid: \$ _____
Balance Due: \$ _____	Balance Due: \$ _____	Balance Due: \$ _____
JULY	AUGUST	SEPTEMBER 2013
Date Received _____	Date Received _____	Date Received <u>9/2</u>
<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____	<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____	<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____
Amount Paid: \$ _____	Amount Paid: \$ _____	Amount Paid: \$ <u>200</u>
Balance Due: \$ _____	Balance Due: \$ _____	Balance Due: \$ <u>0.00</u>
OCTOBER	NOVEMBER	DECEMBER
Date Received <u>9/30</u>	Date Received <u>10/28</u>	Date Received <u>11/25</u>
<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____	<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____	<input type="checkbox"/> Cash <input type="checkbox"/> Check # _____
Amount Paid: \$ <u>200</u>	Amount Paid: \$ <u>200</u>	Amount Paid: \$ <u>200</u>
Balance Due: \$ <u>0.00</u>	Balance Due: \$ <u>0.00</u>	Balance Due: \$ <u>0.00</u>

1. Registration fee due at time of enrollment.
2. Enrollment fee required if student is absent over 2 months.
3. Tuition fee is due in advance by the end of each month.

Please make check payable to: _____

**PLEADING
CONTINUES
IN NEXT
VOLUME**

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Feb 19 2015 9:26 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

WESLEY ALLEN LEWIS,
Appellant(s),

vs.

MARIA DANIELA LEWIS A/K/A MARIA
DANIELA PERDOMO,
Respondent(s),

Case No: D427054

Docket No: 66497

RECORD ON APPEAL VOLUME 1

ATTORNEY FOR APPELLANT
WESLEY LEWIS, PROPER PERSON
4650 IDAHO AVE.
LAS VEGAS, NV 89104

ATTORNEY FOR RESPONDENT
FRANCES-ANN FINE, ESQ.
8975 S. PECOS ROAD, STE. 5
HENDERSON, NV 89074

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vs.
Wesley Allen Lewis, Defendant.**

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**D-10-427054-D Maria Daniela Lewis, Plaintiff
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**D-10-427054-D Maria Daniela Lewis, Plaintiff
vs.
Wesley Allen Lewis, Defendant.**

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D-10-427054-D

FILED

MAR 18 1 20 PM '10

Ann L. Johnson
CLERK OF THE COURT

COMP
MARIA DANIELA LEWIS
4555 E. Sahara, #217
Las Vegas, NV 89104
(702) 273-0992
Plaintiff In Proper Person

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS,
Plaintiff,

vs.

WESLEY ALLEN LEWIS,
Defendant.

Case No.
Dept. No.

D-10-427054-D
P

COMPLAINT FOR DIVORCE

COMES NOW Plaintiff above named, and for cause of action alleges as follows:

1. That the Plaintiff is a resident of the State of Nevada and, for a period of more than six weeks immediately preceding the commencement of this action, has resided and been physically present and domiciled in the State of Nevada, and now resides and is domiciled therein, and during all of said period of time, Plaintiff has had and still has the intent to keep said State of Nevada her home, residence and domicile for an indefinite period of time.
2. That the Plaintiff and Defendant were duly and legally married on or about the 23rd day of June, 2006, in Las Vegas, Nevada, and ever since said date have been and now are, husband and wife.
3. That there is one (1) minor child born of this marriage, to-wit: ISABELLA LEWIS, born August 10, 2006; that there are no minor children adopted by the parties during this marriage; and that, Plaintiff, MARIA DANIELA LEWIS, to the

best of her knowledge, is not pregnant. That matters pertaining to said child's care, custody and control be adjudicated by the court as set forth herein below.

4. That there are no community property and debts of the parties hereto be divided by this court.

5. That during the course of their marriage, the tastes, mental disposition, views, likes and dislikes of Plaintiff and Defendant have become so widely divergent that the parties have become incompatible to such an extent that it is impossible for them to live together as husband and wife; that the incompatibility is so great that there is no possibility of reconciliation.

6. That Plaintiff, **MARIA DANIELA LEWIS**, wishes to be restored to her former name, to-wit: **MARIA DANIELA PERDOMO**.

7. That neither Plaintiff nor Defendant should be entitled to spousal support (alimony) or any other monetary claim each may have against the other for support or maintenance required to pay spousal support to the other.

WHEREFORE, Plaintiff prays judgement as follows:

1. That the bonds of matrimony now and heretofore existing between Plaintiff and Defendant be dissolved, set aside and forever held for naught, and that the parties hereto, and each of them, be restored to their single, unmarried states.

2. That Plaintiff and Defendant are fit and proper persons to be awarded joint legal custody of the parties' minor child with Plaintiff having primary physical custody of the child in her habitual state of residence, Nevada, and with Defendant having visitation as agreed to by the parties. Failing mutual agreement, Plaintiff proposes the following visitation schedule for Defendant: every week on his scheduled days off from employment. Holiday visitation will be as follows: alternating major holidays (including, but not limited to, Easter, Thanksgiving, Christmas, and the child's birthday) beginning

1 with Father having the minor child for Easter 2010. Mother shall have the minor
2 child for Mother's Day; Father shall have the minor child for Father's Day.

3 3. That both parties are hereby informed of the requirements of EDCR 5.07 as follows:

4 **Rule 5.07 Seminar for Separating Parents**

5 (a) All parties in all domestic relations actions under Chapters 125, 125A, and 126 of the
6 Nevada Revised Statutes, where the interests of a child under the age of 18 years are involved,
7 shall successfully complete the seminar for separating parents approved by the family division
8 of the court.

9 (b) The seminar shall be successfully completed within 45 days of service of the initial
10 complaint or petition upon the defendant.

11 (c) No action shall proceed to final hearing or order until there has been compliance with
12 this rule; provided, however, that non-compliance by a parent who enters no appearance shall
13 not delay the final hearing. The trial judge hearing the matter may take other appropriate action to
14 compel attendance, including but not limited to action for contempt.

15 (d) For good cause shown, the assigned trial judge may waive the requirement of
16 completion of this program in individual cases.

17 4. That Plaintiff and Defendant should be equally responsible for providing medical
18 insurance for the child. That Plaintiff and Defendant will be equally responsible for any
19 medical costs of the child which are not covered by medical insurance until said child
20 reaches the age of eighteen (18) years, unless said child is still enrolled in high school,
21 then when said child reaches the age of nineteen (19) years, marries, or becomes self-
22 supporting or upon the death of the person required to pay said medical insurance.

23 5. That Defendant shall be required to pay, for the medical and other care, education,
24 support and maintenance of said child the sum of three hundred and eighty dollars
25 (\$380.00) per month, which amount, to the best of Plaintiff's knowledge and belief, is in
26 compliance with the appropriate formula set forth in NRS 125B.070 et. seq. (18% of
27 Defendant's gross monthly income), until said child reach the age of eighteen (18) years.
28

1 unless said child is still enrolled in high school, then when said child reaches the age of
2 nineteen (19) years, marries, or becomes self-supporting or upon the death of the
3 person required to pay said child support.

4 6. Defendant and Plaintiff acknowledge that they are subject to NRS 125.450(2), NRS
5 31A.020 through 31A.240 inclusive and Subsections 2 and 3 of this Act regarding
6 the withholding of wages and commissions for delinquent payment of support.

7 7. Defendant and Plaintiff acknowledge that they are subject to NRS 125.510(6) and NRS
8 200.359 which requires that they be cognizant of the penalty for violating certain terms
9 of this agreement, specifically:
10

11 PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION,
12 CONCEALMENT OR DETENTION OF A CHILD IN
13 VIOLATION OF THIS ORDER IS PUNISHABLE AS A
14 CATEGORY D. FELONY AS PROVIDED IN NRS 193.130.
15 NRS 200.359 provides that every person having joint legal
16 custody to a child, a limited right of custody to a child or any
17 parent having no right of custody to the child who willfully
18 detains, conceals or removes the child from a parent,
19 guardian or other person having lawful custody or a right of
20 visitation of the child in violation of an order of this court, or
21 REMOVES the child from the jurisdiction of the court without
22 the consent of either the court or all persons who have the
23 right to custody or visitation is subject to being punished for a
24 category D felony as provided in NRS 193.130.

25 8. Both parties hereto are on notice and acknowledge that they are subject to NRS
26 125C.200, specifically:

27 Consent required from noncustodial parent to remove child from state;
28 permission from court; change of custody. If custody has been established
and the custodial parent intends to move his residence to a place outside of
this state and to take the child with him, he must, as soon as possible and
before the planned move, attempt to obtain the written consent of the
noncustodial parent to move the child from this state. If the noncustodial
parent refuses to give that consent, the custodial parent shall, before he leaves
this state with the child, petition the court for permission to move the child. The
failure of a parent to comply with the provisions of this section may be
considered as a factor if a change of custody is requested by the noncustodial
parent.

9. Defendant and Plaintiff are on notice and acknowledge that, as set forth in NRS 125.510
(7), the terms of the Hague Convention of October 25, 1980, adopted by the 14th

Session of the Hague Conference on Private International Law, apply if a parent abducts or wrongfully retains a child in a foreign country.

10. That both parties are on notice that the child support order may be reviewed every three years (pursuant to NRS 125B.145) and that, pursuant to N. R. S. 125C.010, the State of Nevada shall be the habitual state of residence of the child.

11. That there are no community property and debt of the parties hereto be divided by this court.

12. That Plaintiff, **MARIA DANIELA LEWIS**, be restored to her former name, to-wit: **MARIA DANIELA PERDOMO**.

13. That neither Plaintiff nor Defendant should be entitled to spousal support (alimony) or any other monetary claim each may have against the other for support or maintenance required to pay spousal support to the other.

14. For such other and further relief as to the Court may deem met and proper in the premises.

DATED this 12 day of March, 2010.


MARIA DANIELA LEWIS

VERIFICATION

STATE OF NEVADA)

: ss.

COUNTY OF CLARK)

MARIA DANIELA LEWIS, being first duly sworn deposes and says:

That she is the Plaintiff in the above-entitled action; that she has read the foregoing COMPLAINT FOR DIVORCE and knows the contents thereof; that the same is true of her own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters she believes to be true.


MARIA DANIELA LEWIS

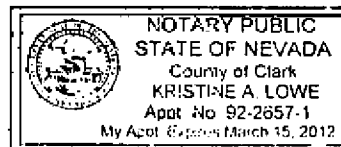
ACKNOWLEDGEMENT

On the 12 day of March, 2010, before me, the undersigned, a Notary Public in and for said State, personally **MARIA DANIELA LEWIS**, personally known or proven to me to be the person

1 who executed the above instrument, and acknowledged to me that she executed the same for
2 purposes stated therein.

3 WITNESS my hand and official seal.

4 
5 **NOTARY PUBLIC** in and for above
6 mentioned County and State





726930

D-10-427054-D

FILED

MAR 18 1 22 PM '10

Ann L. Brown
CLERK OF THE COURT

AFFT

MARIA DANIELA LEWIS

4555 E. Sahara, #217

Las Vegas, NV 89104

(702) 273-0992

Plaintiff In Proper Person

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

D-10-427054-D

Dept: P

Case No.

Dept. No.

AFFIDAVIT OF RESIDENT WITNESS

STATE OF NEVADA)

: ss.

COUNTY OF CLARK)

I, **HUIZAR ADRIAN BANUELOS**, do hereby swear under penalty of perjury that the assertions of this affidavit are true.

1. That I am over the age of eighteen and competent to testify of my own knowledge to the following.
2. I have lived in the state of Nevada continuously since on or about February 1, 2006; I presently live at 4855 Vegas Valley Drive, Apt. 118, Las Vegas, Nevada 89121.
3. To my personal knowledge, **MARIA DANIELA LEWIS** lives at 4555 E. Sahara, #217 Las Vegas, Nevada 89104, and has been physically living in the State of Nevada on a daily basis for at least six (6) weeks prior to the filing of the Complaint for Divorce herein.
4. To my personal knowledge, **MARIA DANIELA LEWIS**, has physically lived continuously in the state of Nevada since on or about February 1, 2006.
5. I see the Plaintiff on the average of four to five times a week. The Plaintiff is my personal friend.

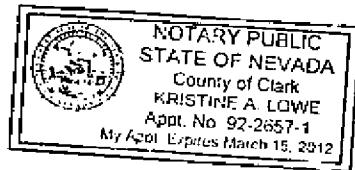
1 6. I know of my own personal knowledge that **MARIA DANIELA LEWIS** is a bona fide
2 resident of the State of Nevada.

3 DATED this 12 day of March, 2010.

4 Adrian Banuelos Huizar
5 **HUIZAR ADRIAN BANUELOS**

6
7 **SUBSCRIBED AND SWORN** before
8 me this 12 day of March, 2010.

9 Kristine A. Lowe
10 **NOTARY PUBLIC** in and for the above
11 mentioned County and State



1 STATE OF NEVADA)

: ss:

AFFIDAVIT OF SERVICE

2 COUNTY OF CLARK)

3 MADGA PAEZ being duly sworn, says: That at all times herein affiant was and is over 18 years of age,
4 not a party to nor interested in the proceeding in which this affidavit is made. That affiant received
5 copy(ies) of the Summons and Complaint for Divorce, on the 22 day of March
6 2010 and served the same on the 22 day of March, 2010 by: 22

(Affiant must complete the appropriate paragraph)

7 1. Delivering and leaving a copy with the Defendant, WESLEY ALLEN LEWIS at 24 Hour Fitness located
8 at 4480 E Charleston Blvd., Las Vegas, Nevada 89104 at 10:45 p.m. (state address)

9 2. Serving the Defendant by personally delivering and leaving a copy with _____
10 a person of suitable age and discretion residing at the Defendant's usual place of abode located at: _____
11 (state address)

(Use paragraph 3 for service upon agent, completing A or B)

12 3. Serving the Defendant by personally delivering and leaving a copy at _____
13 (state address)

14 a. With _____ at _____ an agent
15 lawfully designated by statute to accept service of process;

16 b. With _____, pursuant to NRS 14.020 as a person of suitable age
17 and discretion at the above address, which address is the address of the resident agent as shown on the
18 current certificate of designation filed with the Secretary of State.

19 4. Personally depositing a copy in a mail box of the United States Post Office, enclosed in a sealed
20 envelope, postage prepaid (Check appropriate method):

21 Ordinary mail

22 Certified mail, return receipt requested

23 Registered mail, return receipt requested

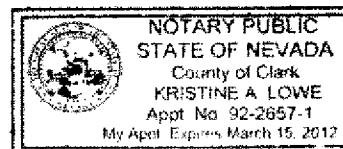
24 addressed to the Defendant, _____, at Defendant's last known address which is
25 _____ (Print Defendant's address)

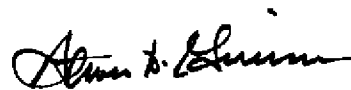
26 I declare under penalty of perjury under the law of the state of Nevada that the foregoing is true and
27 correct.

28 Signature of person making service

SUBSCRIBED AND SWORN to before me
this 23 day of March, 2010.

NOTARY PUBLIC in and for the State
and County above mentioned.





CLERK OF THE COURT

AFFR
MARIA DANIELA LEWIS
4555 E. Sahara, #217
Las Vegas, NV 89104
(702) 273-0992
Plaintiff In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

MARIA DANIELA LEWIS,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

Case No. D-10-427054-D

Dept. No. P

AFFIDAVIT OF RESIDENT WITNESS

STATE OF NEVADA

)

: ss.

COUNTY OF CLARK

)

I, MAGDAGA PAEZ, do hereby swear under penalty of perjury that the assertions of this affidavit are true.

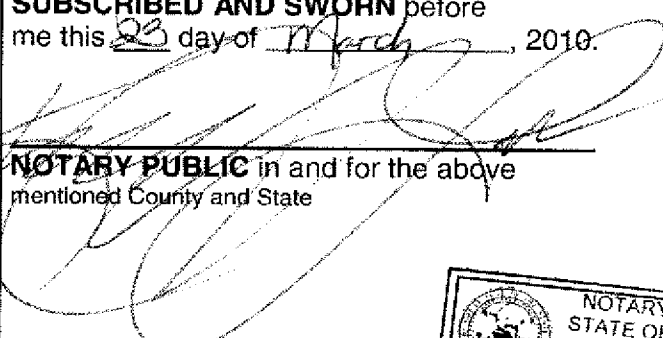
1. That I am over the age of eighteen and competent to testify of my own knowledge to the following.
2. I have lived in the state of Nevada continuously since on or about May 1, 1995; I presently live at 1413 Page Street, Las Vegas, Nevada 89104.
3. To my personal knowledge, **MARIA DANIELA LEWIS** lives at 4555 E. Sahara, #217, Las Vegas, Nevada 89104, and has been physically living in the State of Nevada on a daily basis for at least six (6) weeks prior to the filing of the Complaint for Divorce herein.
4. To my personal knowledge, **MARIA DANIELA LEWIS**, has physically lived continuously in the state of Nevada since on or about March 1, 2006.
5. I see the Plaintiff on the average of three to four times a week. The Plaintiff is my personal friend.

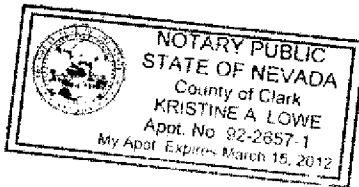
6. I know of my own personal knowledge that **MARIA DANIELA LEWIS** is a bona fide resident of the State of Nevada.

DATED this 23 day of March, 2010.


MAGDA PAEZ

SUBSCRIBED AND SWORN before me this 23 day of March, 2010.


NOTARY PUBLIC in and for the above mentioned County and State



ORIGINAL

Allen D. Grierson

CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS,

Plaintiff,

-vs-

WESLEY ALLEN LEWIS,

Defendant.

D-10-427054-D

Dept: P

Case No.

Dept. No.

JOINT PRELIMINARY INJUNCTION
DOMESTIC

NOTICE! THIS INJUNCTION IS EFFECTIVE UPON THE PARTY REQUESTING SAME WHEN ISSUED AND AGAINST THE OTHER PARTY WHEN SERVED. THIS INJUNCTION SHALL REMAIN IN EFFECT FROM THE TIME OF ITS ISSUANCE UNTIL TRIAL OR UNTIL DISSOLVED OR MODIFIED BY THE COURT. DISOBEDIENCE OF THIS INJUNCTION IS PUNISHABLE BY CONTEMPT.

To: Plaintiff and Defendant

YOU ARE HEREBY RESTRAINED FROM:

1. Transferring, encumbering, concealing selling or otherwise disposing of any of the joint, common or community property of the parties, except in the usual course of business or for the necessities of life, without the written consent of the parties or the permission of the court.

2. Molesting, harassing, disturbing the peace of or committing an assault or battery on the person of the other party or on any child, step-child or any other relative of the parties.

3. Removing any child of the parties then residing in the State of Nevada with an intent or effect to deprive the court of jurisdiction as to said child without the prior written consent of the parties or the advance permission of the court.

STEPHEN D. GRIERSON CLERK OF COURT

By: *Andrew Watson*

DEPUTY CLERK

Date

Family Court and Services Center
601 N. Pecos Road
Las Vegas, Nevada 89101

Submitted by: *[Signature]*

MARIA DANIELA LEWIS
4555 E. Sahara, #217
Las Vegas, NV 89104
Plaintiff In Proper Person

Allen D. Grierson

CLERK OF THE COURT

ORIGINAL

SUMM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

MARIA DANIELA LEWIS,

Plaintiff,

-vs-

WESLEY ALLEN LEWIS,

Defendant.

D-10-427054-D

Dept: P

Case No.

Dept. No.

SUMMONS

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A civil Complaint has been filed by the plaintiff against you for the relief set forth in the Complaint.

"This is an action to dissolve the bonds of matrimony now and heretofore existing between you and Plaintiff."

1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you exclusive of the day of service, you must do the following:

a. File with the Clerk of this Court, whose address is listed below, a formal written response to the Complaint in accordance with the rules of the Court.

b. Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the plaintiff and this Court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief request in the Complaint.

3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. That State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators, each have 45 days after the Service of this Summons within which to file an Answer or other responsive pleadings.

Issued at the direction of:

STEPHEN D. GRIERSON, CLERK OF COURT

By: *Andrew Watson* 3/18/2010
DEPUTY CLERK Date

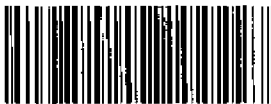
Family Court and Services Center
601 North Pecos
Las Vegas, NV 89101

MARIA DANIELA LEWIS

4555 E. Sahara, #217

Las Vegas, NV 89104

IN PROPER PERSON



769347

D-10-427054-D

1 CERT

2 WESLEY A. LEWIS
3 4650 Idaho Street
4 Las Vegas, Nevada 89104
(702) 525-9490
Defendant In Proper Person

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FILED

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Ann L. Johnson
CLERK OF THE COURT

5 DISTRICT COURT
6 FAMILY DIVISION
7 CLARK COUNTY, NEVADA

8 MARIA D. LEWIS,
9 Plaintiff,

Case No: D-10-427054-D
Dept. No: P

10 vs.

11 WESLEY A. LEWIS,
12 Defendant.

13 **CERTIFICATE OF MAILING**

14 I hereby certify that on the 9 day of April, 2010, I did deposit in the United
15 States Mail, First Class, postage prepaid thereon, one (1) true and correct copy of the
16 ANSWER AND COUNTERCLAIM to the following:

17 Maria D. Lewis
18 4555 E. Sahara Ave., #217
19 Las Vegas, Nevada 89104
20 Plaintiff In Proper Person

21 *Wesley A. Lewis*
22 _____
23 WESLEY A. LEWIS
24
25
26
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D-10-427054-D

FILED

APR 12 11 29 AM '10

ANS
WESLEY A. LEWIS
4650 Idaho Street
Las Vegas, Nevada 89104
(702) 525-9490
Defendant In Proper Person

Ann L. Quinn
CLERK OF THE COURT

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA D. LEWIS,
Plaintiff,

Case No: D-10-427054-D
Dept. No: P

vs.

WESLEY A. LEWIS,
Defendant.

ANSWER TO COMPLAINT FOR DIVORCE AND COUNTERCLAIM

COMES NOW Defendant, WESLEY A. LEWIS, In Proper Person, and for his Answer to Plaintiff's Complaint for Divorce on file herein, denies and alleges as follows:

I.

Answering Paragraphs 1, 3, 4, 5, 6, and 7, of the Plaintiff's Complaint, Defendant admits each and every allegation contained therein.

II.

Answering Paragraph 2, of the Plaintiff's Complaint, Defendant denies each and every allegation contained therein.

DATED this 9 day of April, 2010.

Wesley Lewis
WESLEY A. LEWIS
4650 Idaho Street
Las Vegas, Nevada 89104
(702) 525-9490
Defendant In Proper Person

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1 Counterdefendant's knowledge, is not pregnant

2 VI.

3 That Counterclaimant and Counterdefendant are fit and proper persons to have
4 joint legal custody of the minor child with Counterclaimant having primary physical
5 care, custody and control of the minor child subject to Counterdefendant's right to
6 reasonable visitation.

7 VII.

8 That pursuant to NRS 125C.200, if custody has been established and the
9 custodial parent intends to move his or her residence to a place outside this state and to
10 take the minor child with him or her, he or she must, as soon as possible and before the
11 planned move, attempt to obtain the written consent of the non-custodial parent to move
12 the child from this state. If the non-custodial parent refuses to give that consent, the
13 custodial parent shall, before he or she leaves this state with the child, petition the court
14 for permission to move the child. The failure of a parent to comply with the provisions
15 of this section may be considered as a factor if a change of custody is requested by the
16 noncustodial parent.

17 VIII.

18 That Counterclaimant and Counterdefendant are both subject to the following
19 language, in accordance with NRS 125.510(6):
20

21 **PENALTY FOR VIOLATION OF THE ORDER: THE ABDUCTION,**
22 **CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION OF**
23 **THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY AS**
24 **PROVIDED IN NRS 193.130. NRS 200.359 provides that every person having**
25 **a limited right of custody to a child or any parent having no right of custody to**
26 **the child who willfully detains, conceals or removes the child from a parent,**
27 **guardian or other person having lawful custody or a right of visitation of the**
28 **child in violation of an order of this court, or removes the child from the**
jurisdiction of the court without consent of either the court or all persons who
have the right to custody or visitation is subject to being punished for a
category D felony as provided in NRS 193.130.

IX.

That pursuant to NRS 125C.010 the State of Nevada, within in the Continental United States, is the habitual residence of the minor child.

X.

That pursuant to NRS 125.510(7) and (8), the terms of the Hague Conference of October 25, 1980, adopted by the 14th Session of the Hague Conference on Private International Law are applicable to the parties:

Section 8. If a parent of the child lives in a foreign country or has significant Commitments in a foreign country:

- (a) The parties may agree, and the Court shall include in the Order for custody of the child, that the United States is the country of habitual residence of the child for the purpose of applying the terms of the Hague Convention as set forth in Subsection 7.
- (b) Upon motion of the parties, the Court may order the parent to post a bond if the Court determines that the parents poses and imminent risk of wrongfully removing or concealing the child outside the country of habitual residence. The bond must be in an amount determined by the Court and may be used only to pay for the cost of locating the child and returning him to his habitual residence. The fact that a parent has significant commitments in a foreign country does not create a presumption that the parent posses an imminent risk of wrongfully removing or concealing the child.

XI.

That both Plaintiff and Defendant should be required to complete the mandatory COPE class, pursuant to EDCR 5.70 and provide proof of same to the Court.

XII.

That the Defendant is fit, able-bodied and is capable of providing child support pursuant to NRS 125B et. seq., in a sum equal to eighteen percent (18%) of her gross monthly income as and for the support and maintenance of the minor child until such time as the minor child attains the age of eighteen (18) years, unless the child is still enrolled in high school, then until the child reaches the age of nineteen (19) years, or becomes otherwise emancipated.

1 XIII.

2 That any and all child support shall be payable through wage assignment with
3 Counterdefendant's employer, pursuant to NRS Chapter 31A, should Counterdefendant
4 become thirty (30) days delinquent in monthly child support payments.

5 XIV.

6 That the Counterdefendant continue to provide major medical insurance
7 coverage for the parties' one (1) minor child, with each party equally dividing the
8 monthly premium and any and all medical, dental (including orthodontic care) and
9 optical expenses not covered by insurance using the 30/30 day rule.

10 XV.

11 That there is no community property of the parties hereto to be adjudicated by
12 this Court.

13 XVI.

14 That there are no community debts of the parties hereto to be adjudicated by this
15 Court.

16 XVII.

17 That neither party be entitled to an award of spousal support from the other
18 party.

19 XVIII.

20 That Counterdefendant be awarded attorney's fees and costs associated with this
21 action, and that said amount be reduced to judgment.

22 XIX.

23 That Counterdefendant has no position as to whether or not the Counterclaimant is
24 restored to her maiden name.

25 **WHEREFORE** Counterclaimant, WESLEY A. LEWIS, prays judgment as
26 follows:

27 1. That the bonds of matrimony now and heretofore existing between the
28 Counterclaimant and Counterdefendant be dissolved, set aside and forever held for

1 naught, and that the parties hereto, and each of them, be restored to their single,
2 unmarried status.

3 2. That the parties' be awarded joint legal custody of their one (1) minor
4 child, to-wit: ISABELLA S. LEWIS, born August 10, 2006, with the Counterdefendant
5 having primary physical care, custody and control of the minor child subject to
6 Counterclaimant's right to reasonable visitation.

7 3. That both Counterclaimant and Counterdefendant are subject to the
8 following language, in accordance with NRS 125.510(6):

9 **PENALTY FOR VIOLATION OF THE ORDER: THE ABDUCTION,**
10 **CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION OF**
11 **THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY AS**
12 **PROVIDED IN NRS 193.130. NRS 200.359 provides that every person having**
13 **a limited right of custody to a child or any parent having no right of custody to**
14 **the child who willfully detains, conceals or removes the child from a parent,**
15 **guardian or other person having lawful custody or a right of visitation of the**
16 **child in violation of an order of this court, or removes the child from the**
17 **jurisdiction of the court without consent of either the court or all persons who**
18 **have the right to custody or visitation is subject to being punished for a**
19 **category D felony as provided in NRS 193.130.**

20 4. That pursuant to NRS 125C.200, if custody has been established and the
21 custodial parent intends to move his or her residence to a place outside this state and to
22 take the minor child with him or her, he or she must, as soon as possible and before the
23 planned move, attempt to obtain the written consent of the non-custodial parent to move
24 the child from this state. If the non-custodial parent refuses to give that consent, the
25 custodial parent shall, before he or she leaves this state with the child, petition the court
26 for permission to move the child. The failure of a parent to comply with the provisions
27 of this section may be considered as a factor if a change of custody is requested by the
28 noncustodial parent.

29 5. That pursuant to NRS 125C.010 the State of Nevada, within in the
30 Continental United States, is the habitual residence of the minor child.

31 6. That pursuant to NRS 125.510(7) and (8), the terms of the Hague
32 Conference of October 25, 1980, adopted by the 14th Session of the Hague Conference

1 on Private International Law are applicable to the parties:

2 Section 8. If a parent of the child lives in a foreign country or has significant
3 Commitments in a foreign country:

4 (a) The parties may agree, and the Court shall include in the Order for custody
5 of the child, that the United States is the country of habitual residence of the
6 child for the purpose of applying the terms of the Hague Convention as set
7 forth in Subsection 7.

8 (b) Upon motion of the parties, the Court may order the parent to post a
9 bond if the Court determines that the parent poses and imminent risk of
10 wrongfully removing or concealing the child outside the country of
11 habitual residence. The bond must be in an amount determined by the
12 Court and may be used only to pay for the cost of locating the child and
13 returning him to his habitual residence. The fact that a parent has
14 significant commitments in a foreign country does not create a
15 presumption that the parent poses an imminent risk of wrongfully
16 removing or concealing the child.

17 7. That both Counterdefendant and Counterclaimant should be required to
18 complete the mandatory COPE class, pursuant to EDCR 5.70 and provide proof of same
19 to the Court.

20 8. That the Counterdefendant be required to pay child support pursuant to
21 NRS 125B et. seq., in a sum equal to eighteen percent (18%) of her gross monthly
22 income as and for the support and maintenance of the minor child until such time as the
23 minor child attains the age of eighteen (18) years, unless the child is still enrolled in
24 high school, then until the child reaches the age of nineteen (19) years, or becomes
25 otherwise emancipated.

26 9. That any and all child support shall be payable through wage assignment
27 with Counterdefendant's employer, pursuant to NRS Chapter 31A, should
28 Counterdefendant become thirty (30) days delinquent in monthly child support payments.

29 10. That the Counterdefendant continue to provide major medical insurance
30 coverage for the parties' one (1) minor child, with each party equally dividing the
31 monthly premium and any and all medical, dental (including orthodontic care) and
32 optical expenses not covered by insurance using the 30/30 day rule.

1 11. That the Court make an equal distribution of the parties' community
2 property.

3 12. That the Court make an equal distribution of the parties community
4 debts.


5 13. That neither party be entitled to an award of spousal support from the
6 other party.

7 14. That Counterdefendant be awarded attorney's fees and costs associated
8 with this action, and that said amount be reduced to judgment.

9 15. That Counterdefendant has no position as to whether or not the
10 Counterclaimant is restored to her maiden name.

11 16. For such other and further relief as to the Court may deem just and
12 proper in the premises.

13 **DATED** this 9 day of April, 2010.

14
15
16 
17 WESLEY A. LEWIS
18 4650 Idaho Street
19 Las Vegas, Nevada 89104
20 (702) 525-9490
21 Defendant In Proper Person
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VERIFICATION

STATE OF NEVADA)
COUNTY OF CLARK) ss:

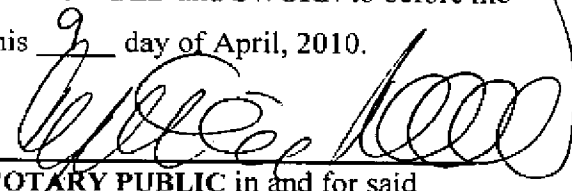
WESLEY A. LEWIS, under penalties of perjury, being first duly sworn, deposes and says:

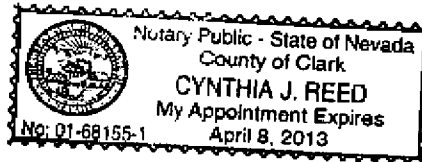
That I am the Defendant in the above-entitled action; that I have read the foregoing Answer to Complaint for Divorce and knows the contents thereof; that the same is true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true.

DATED this 9 day of April, 2010.


WESLEY A. LEWIS

SUBSCRIBED and SWORN to before me
this 9 day of April, 2010.


NOTARY PUBLIC in and for said
County and State



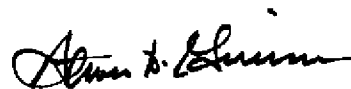
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STATE OF NEVADA)
COUNTY OF CLARK) ss.

On this 9th day of April, 2010, before me, the undersigned Notary Public in and for the said County and State, personally appeared WESLEY A. LEWIS, known to me to be the person described in and who executed the foregoing Answer to Complaint for Divorce, and who acknowledged to me that he did so freely and voluntarily and for the uses and purposes therein mentioned.

WITNESS my hand and official seal.

NOTARY PUBLIC in and for said
County and State



CLERK OF THE COURT

CERT
MARIA DANIELA LEWIS
4555 E. Sahara, #217
Las Vegas, NV 89104
(702) 273-0992
Plaintiff In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

MARIA DANIELA LEWIS,
Plaintiff,

vs.

WESLEY ALLEN LEWIS,
Defendant.


Case No. D-10-427054-D
Dept. No. P

CERTIFICATE OF MAILING

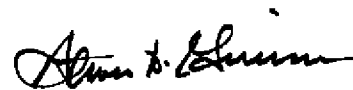
I hereby certify that service of the REPLY TO DEFENDANT'S ANSWER AND
COUNTERCLAIM was made on Defendant, WESLEY A. LEWIS, In Proper Person, pursuant to
NRCP 5(b) by depositing a copy of same in the United States Mail in Las Vegas, Nevada,
postage prepaid, addressed as follows:

WESLEY A. LEWIS
4650 Idaho Street
Las Vegas, NV 89104
DEFENDANT IN PROPER PERSON

Dated this 19 day of April, 2010.



KRISTINE A. LOWE
Employee of Legal Self Help
1315 Belcastro Street
Las Vegas, Nevada 89117



CLERK OF THE COURT

RPLY

MARIA DANIELA LEWIS

4555 E. Sahara, #217

Las Vegas, NV 89104

(702) 273-0992

Plaintiff In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

MARIA DANIELA LEWIS,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

Case No.

Dept. No.

D-10-427054-D
P

REPLY TO DEFENDANT'S ANSWER AND COUNTERCLAIM FOR DIVORCE

Plaintiff/Counterdefendant, MARIA DANIELA LEWIS, in Proper Person, files this Reply to Counterclaim and admits, alleges, and denies as follows:

1. Plaintiff admits the allegations contained in paragraphs I., II., III., IV., V., VII., VIII., IX., X., XI., XV., XVI., XVII., and XIX., inclusive, of the Answer to Complaint for Divorce and Counterclaim of Defendant/Counterclaimant on file herein.
2. Plaintiff denies the allegations contained in paragraphs VI., XII., XIII., XIV., and XVIII., inclusive, of the Answer to Complaint for Divorce and Counterclaim of Defendant/Counterclaimant on file herein.

WHEREFORE, Plaintiff prays for judgment as follows:

1. That the Counterclaim be dismissed with prejudice and that Defendant/Counterclaimant take nothing therefrom;
2. For such other relief as the Court finds to be just and proper.

DATED this 19th day of April, 2010.


MARIA DANIELA LEWIS

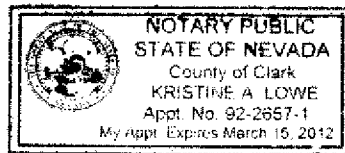
ACKNOWLEDGEMENT AND VERIFICATION

STATE OF NEVADA)
: ss.
COUNTY OF CLARK)

On the 19th day of April, 2010, before me, **KRISTINE A. LOWE**, the undersigned, a Notary Public in and for said State, personally appeared **MARIA DANIELA LEWIS**, proven to me on the basis of satisfactory evidence to be the person who executed the above instrument, and acknowledged to me that she executed the same for purposes stated therein.

WITNESS my hand and official seal.

NOTARY PUBLIC in and for above mentioned County and State



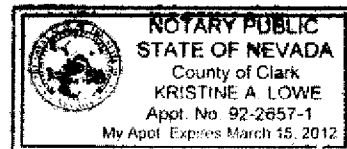
STATE OF NEVADA)
: ss.
COUNTY OF CLARK)

MARIA DANIELA LEWIS, being first duly sworn deposes and says:

That she is the Plaintiff/Counterdefena in the above-entitled action; that she has read the foregoing **REPLY TO DEFENDANT'S ANSWER AND COUNTERCLAIM FOR DIVORCE** and knows the contents thereof; that the same is true of her own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters she believes to be true.

MARIA DANIELA LEWIS

SUBSCRIBED AND SWORN before me this 19th day of April, 2010.



NOTARY PUBLIC in and for the above mentioned County and State

CODE: FDF
MARIA DANIELA LEWIS
Nevada Bar No. 4555 E. Sahara #217
Las Vegas NV 89104
702-273-0447
Attorney For IN PROPER PERSON


CLERK OF THE COURT

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

MARIA DANIELA LEWIS
Plaintiff or Petitioner

Case No. D-10-421054-D

WESLEY ALLEN LEWIS
Defendant or Respondent

Dept. No. P

FINANCIAL DISCLOSURE FORM

Financial Statement of: MARIA D LEWIS
First name Middle Last name

Occupation: Sales/service representative

Employed by: 24th Fitness From: 1-10 To: present

Previously Employed by: stay at home From: mother To: _____

Age & Date of Birth: 31 04 05 1979

Level of Education: BA

Level of Disability, if Any: N/A

Marriage Date, if Applicable: 6/23/06

Present Home Address: 4555 E. SAHARA Ave, #217
Las Vegas NV 89104

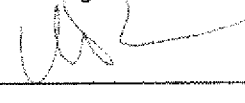
How many adults (over 18) live with you? 0

How much do you receive from each of them each month? _____

I have paid my attorney a retainer of \$ N/A ; and his/her hourly rate is \$ 0

I am the ☒ Plaintiff/Petitioner ☐ Defendant/Respondent in the above action. I swear under penalty of perjury, that the contents of this Financial Disclosure Declaration are true to the best of my knowledge as of this date. I understand that by my signature I verify the material accuracy of the contents. I also understand that any willful misstatements may be contemptuous and could result in my punishment by the Court. I understand I have a duty to supplement this form upon discovering additional assets or debts or upon changed circumstances within 10 days of discovery.

I declare under penalty of perjury that the foregoing and following are true and correct.

Executed on 6/2/10 Signature 

Case No. D-10-427054-D
 Dept. No. P

ASSET AND DEBT SCHEDULE					
NOTE: PLEASE USE ADDITIONAL ASSET AND DEBT SCHEDULES, AND CARRY TOTALS TO THIS SCHEDULE IF YOU NEED TO LIST ADDITIONAL ASSETS AND DEBTS BEYOND THE LINES PROVIDED ON THIS SCHEDULE.		PROPERTY VALUE (List all assets and debts @ current values)			
Note: In general, Separate Property is defined as that acquired before marriage, or after marriage by gift or inheritance.		COMMUNITY		SEPARATE	
		TOTAL	ISSUED	DATE	
ASSETS					
CASH: include the last four numbers of the account, and the name and location including the branch of the institution, including CDs.					
1	CASE CHECKING				100.00
2					
3					
4	Subtotal				
INVESTMENTS: include mutual funds, stocks, bonds, brokerage accounts, and other investment accounts. Provide the last four numbers of the account, and the name and location including the branch of the institution.					
5					
6					
7		0	0	0	0
8	Subtotal				
BUSINESS INTERESTS: If you own all or part include. Indicate percentage of ownership here.					
9					
10					
11	Subtotal	0	0	0	0
RECEIVABLES & DEPOSITS					
12					
13	Subtotal				
REAL PROPERTY: Provide common address and type of property, e.g., condominium, townhouse, single family residence, commercial or retail.					
14					
15					
16		0	0	0	0
17					
18	Subtotal				
AUTOS & RECREATIONAL VEHICLES: Provide make, model, mileage, and vehicle identification number.					
19	1999 Saturn				1,000.00
20					
21					
22					
23					
24	Subtotal				
PERSONAL PROPERTY: Provide information on furniture, electronics, household goods, tools, computers, artwork, precious metals and jewelry having value of \$500 or greater.					
25					
26					
27					
28					
29					
30					
31					
32					
33					
34					
35	Subtotal				0

1100.00

Case No. D-10-427054-D
 Dept. No. 2

PERSONAL INCOME SCHEDULE		
IF SELF-EMPLOYED OR BUSINESS OWNER PLEASE FILL IN THE BUSINESS INCOME/EXPENSE SCHEDULE		
YOUR OWN INCOME		AMOUNT
EMPLOYMENT INCOME (if paid weekly multiply by 52 and divide by 12, if paid every two weeks, multiply by 26 and divide by 12)		NOTE: ATTACH COPIES OF YOUR THREE MOST RECENT PAY STUBS
1	Average Gross Monthly Income from Employment (all employment income including salary \$ _____ + bonuses \$ _____ + overtime \$ _____ + commissions \$ _____ + tips \$ _____ + other \$ _____ =	1208.00
2	Average Monthly Paycheck Deduction – Income Taxes	60.00
3	Average Monthly Paycheck Deduction – Social Security	54.00
4	Average Monthly Paycheck Deduction – Medicare	18.00
5	Average Monthly Paycheck Deduction – Health Insurance	
6	Average Monthly Paycheck Deduction – Retirement Plan or 401(k)	
7	Average Monthly Paycheck Deduction – Savings Account	
8	Average Monthly Paycheck Deduction(s) – Other	
9	Total Paycheck Deductions Per Month (Add lines 2-8 above)	132.00
10	Average Net Monthly Income from Employment (Subtract line 9 from line 1)	1076
OTHER INCOME		
11	Monthly Spousal Support/Alimony Awarded by a Court	<i>this amount is variable Plaintiff has been working less</i>
12	Monthly Child Support: court ordered \$ _____ + other/voluntary child support \$ _____ =	N/A
13	Investment Income (Dividends, interest and capital gains)	N/A
14	Rental Income (Enter the Amount of Depreciation Claimed in Computing Rental Income Here: \$ 818)	N/A
15	Retirement Income Including Defined-Benefit Distributions, 401(k) Distributions, military retirement	N/A
16	Social Security Retirement	N/A
17	Social Security Disability/military disability	N/A
18	Supplemental Security Income (SSI)	N/A
19	Unemployment Benefits	N/A
20	Workers Compensation Payments	N/A
21	Other Sources of Income (Describe: such as direct contributions from roommates or indirect payment of expenses by roommates) <i>food stamps</i>	130.00
22	Total Other Income Per Month (Add lines 11-21)	
23	TOTAL INCOME PER MONTH (Add lines 10 and 22)	1206.00

Case No. 0-6-427054-D
 Dept. No. 2

PERSONAL EXPENSE SCHEDULE (NOTE: ALL EXPENSES LISTED BELOW SHOULD BE ON AN AVERAGE MONTHLY BASIS: annual payments divided by 12, semiannual payments divided by 6, and quarterly payments divided by 3)		TOTAL AMOUNT
1	Mortgage or Rent: 1st Mtg. \$ <u>585.32</u> + 2nd Mtg. \$ _____ + line of credit \$ _____ + taxes \$ _____ + insurance _____ =	585.00
2	Utilities: Gas/Oil \$ <u>30</u> + electricity \$ <u>60</u> + TV/cable \$ _____ + water & _____ + garbage _____ =	90
3	Telephone: landline \$ _____ + cellular \$ <u>30</u> + Internet \$ _____ + fax \$ _____ + other \$ _____ =	30.00
4	Food, Groceries & Incidentals (not including entertainment or dining out)	130.00
5	Transportation: monthly payment/lease \$ <u>60</u> + gas and oil _____ + repairs and maintenance, tires \$ _____ + insurance \$ <u>60</u> + license/registration <u>2</u> + parking \$ _____ + public transportation \$ _____ + other \$ _____ =	122.00
6	House Maintenance: housekeeping \$ _____ + garden/lawn care \$ _____ + snow removal \$ _____ + repairs & maintenance \$ _____ + other \$ _____ =	0
7	Entertainment: dining out \$ _____ + movies, shows \$ _____ + music/videos \$ _____ + other \$ _____ =	0
8	Dues, Memberships, Fees: Professional \$ _____ + memberships (health club, country club) \$ _____ + homeowners \$ _____ + fraternal \$ _____ + business \$ _____ + other \$ _____ =	0
9	Health/exercise: clothing/shoes \$ _____ + fees/passes (health clubs etc.) \$ _____ + other \$ _____ =	
10	Clothing: self \$ <u>20</u> + children \$ <u>20</u> + cleaning \$ _____ =	40.00
11	Vacations	
12	Pets: Food \$ _____ + boarding \$ _____ + healthcare \$ _____ + grooming \$ _____ + other \$ _____ =	
13	Healthcare: Insurance \$ _____ + unreimbursed; medical \$ _____ + dental \$ _____ + orthodontic \$ _____ + medications \$ _____ + counseling \$ _____ + physical therapy \$ _____ + chiropractic \$ _____ + other \$ _____ =	
14	Appearance: hair \$ _____ + nails \$ _____ + facials/massage \$ _____ + cosmetics \$ _____ + other \$ _____ =	20
15	Insurance: life \$ _____ + disability \$ _____ + other \$ _____ =	
16	Books, Newspapers & Magazines	
17	Church/Charitable	
18	Accounting & Tax Preparation	
19	Support of Others: Ordered Child Support \$ _____ + voluntary child support \$ _____ + court-ordered spousal support \$ _____ + eldercare \$ _____ =	
20	Miscellaneous: Gifts \$ _____ + storage \$ _____ + flowers \$ _____ + savings \$ _____ + Lawyers fees \$ _____ + other \$ _____ =	
21	Education: Tuition, Books & Fees \$ _____ + extracurricular \$ _____ + sports \$ _____ + music \$ _____ + other \$ _____ =	
22	Childcare: day care \$ _____ + preschool \$ _____ + other \$ _____ =	
23	Minimum Charge Card Payments and other consumer/installment debt: credit card #1 \$ _____ + credit card #2 \$ _____ + credit card #3 \$ _____ + credit card #4 \$ _____ + other debt \$ _____ =	
24	TOTAL MONTHLY EXPENSES (Add lines 1-23 above)	997.00

Case No. D-10-427054-D
Dept. No. 0

INCOME/EXPENSE SUMMARY SCHEDULE	
Total Monthly Income from Personal Income Schedule Line 23	1206.00
Add: Total Average Net Monthly Income from Self-Employment or Business Schedule Line 30	0
Less: Total Monthly Expenses from Personal Expense Schedule line 24	997.00
Net Monthly Income or (Loss)	209.00

Case No. D-10-427094-P
 Dept. No.

ASSET AND DEBT SCHEDULE					
NOTE: PLEASE USE ADDITIONAL ASSET AND DEBT SCHEDULES, AND CARRY TOTALS TO THIS SCHEDULE IF YOU NEED TO LIST ADDITIONAL ASSETS AND DEBTS BEYOND THE LINES PROVIDED ON THIS SCHEDULE.		PROPERTY VALUE (List all assets and debts @ current values)			
Note: In general, Separate Property is defined as that acquired before marriage, or after marriage by gift or inheritance.			COMMUNITY	SEPARATE	
		TOTAL		HUSBAND	WIFE
CASH VALUE OF LIFE INSURANCE. Provide information on any loans against the cash surrender value of a life insurance policy.					
36					
37					
38	Subtotal				
RETIREMENT ACCOUNTS. Provide the name of the account, account number, an administrator. Provide any information on loans against retirement assets.					
39					
40					
41					
42		0	0	0	0
43	Subtotal				
44	TOTAL ASSETS (add Lines 4,8,11,13,18,24,35,38 and 43)				1100.00
DEBT					
LONG TERM DEBT. Provide information on mortgages, notes & deeds of trust, home equity loans and lines of credit, and automobile, recreational vehicle loans and leases.					
45					
46					
47					
48		0	0	0	0
49					
50	Subtotal				
OTHER DEBT. Charge accounts, credit cards, medical debts, and other short-term debts. Provide the name of the lender, and the last four numbers of the account.					
51	Student Loans				14,000.00
52					
53					
54					
55		0	0	0	0
56					
57					
58					
59	Subtotal				
60	TOTAL DEBT (add lines 50 and 59)				
61	NET WORTH (TOTAL ASSETS, line 44 MINUS TOTAL DEBT, line 60)				- 12,900.00

Case No. D-10-427054-D
 Dept. No. p

BUSINESS INCOME/EXPENSE SCHEDULE (Skip this schedule if you are not self-employed or do not own a business)		AMOUNT PER MONTH
1	Average Monthly Gross Receipts from Self-Employment, Business or Businesses	
2	Cost of Sales or Cost of Goods Sold (if applicable)	
3	Gross Profit (Subtract Line 2 from Line 1)	
4	Advertising	
5	Car and truck	
6	Commissions and fees	
7	Deductible meals	
8	Depletion	
9	Depreciation and section 179	
10	Employee benefit programs	
11	Entertainment	
12	Insurance (other than health)	
13	Interest	
14	Legal and professional	
15	Mortgage on building or office space (paid to banks, etc.)	
16	Office expense	
17	Other	
18	Pension and profit-sharing plans	
19	Rent	
20	Repairs and maintenance	
21	Supplies	
22	Taxes and licenses	
23	Travel	
24	Meals	
25	Utilities	
26	Wages	
27	Total Business Expenses Per Month Including Cost of Sales (Add Lines 4-26)	
28	Average Gross Monthly Income from Self-Employment or Business (Subtract Line 27 from Line 3)	
29	Average Estimated Tax Payments on a Monthly Basis (Estimated Tax Payments are made on a quarterly basis. As a result, the required quarterly payment would be divided by three to calculate the average monthly estimated tax payment.)	
30	Average Net Monthly Income from Self-Employment or Business (Subtract Line 29 from Line 28)	

Allen B. Shuman

CLERK OF THE COURT

1 NECC

2 Name *MARIA DANIELA LEWIS*

3 Bar No *IN PROPER PERSON*

4 Address *4555 E. Sahara #217*

5 City/State/Zip *Las Vegas NV 89104*

6 Telephone *(702) 273-0992*

7 Attorney for

DISTRICT COURT

CLARK COUNTY, NEVADA

8
9 *MARIA DANIELA LEWIS*

10 Plaintiff(s),

11 -vs-

12
13 *WESLEY ALLEN LEWIS*

14 Defendant(s).

CASE NO. *D-10-427054-D*

DEPT. NO. *P*

15 **NOTICE OF EARLY CASE CONFERENCE**

16 State of *NEVADA*)
17 County of *CLARK*) ss:

18 TO: *WESLEY ALLEN LEWIS*

19 **PLEASE TAKE NOTICE** that you and each of you are hereby notified that
20 pursuant to NRCP 16.1 an Early Case Conference has been scheduled for the *17th*
21 day of *June*, 20*10*, at *1230 PM*, at the following address:

22 *LEGAL SELF HELP 1315 Belcastro Street*
23 *Las Vegas, NV 89117*

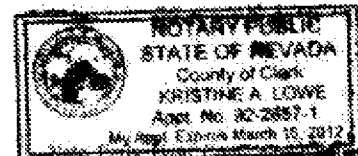
24 You are invited to bring your files and participate in the Conference.

25 DATED this *2* day of *June*, 20*10*.

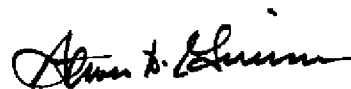
26 By: *[Signature]*
27 ☐ Litigant / ☐ Counsel for Litigant

28 SIGNED AND SWORN to before me this
day of *June*, 20*10*.

Notary Public



19, 2003



CLERK OF THE COURT

CERT

MARIA DANIELA LEWIS

4555 E. Sahara, #217

Las Vegas, NV 89104

(702) 273-0992

Plaintiff In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

MARIA DANIELA LEWIS,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

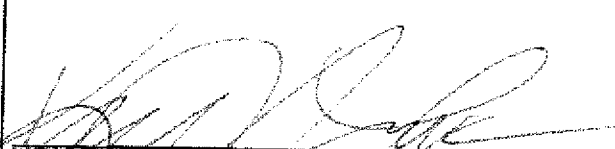
Case No. D-10-427054-D
Dept. No. P

CERTIFICATE OF MAILING

I hereby certify that service of the NOTICE OF EARLY CASE CONFERENCE and FINANCIAL DISCLOSURE FORM was made on Defendant, WESLEY A. LEWIS, In Proper Person, pursuant to NRCP 5(b) by depositing a copy of same in the United States Mail in Las Vegas, Nevada, postage prepaid, addressed as follows:

WESLEY A. LEWIS
4650 Idaho Street
Las Vegas, NV 89104
DEFENDANT IN PROPER PERSON

Dated this 3 day of June, 2010.



KRISTINE A. LOWE
Employee of Legal Self Help
1315 Belcastro Street
Las Vegas, Nevada 89117

FMCO

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Allen D. Blum
CLERK OF THE COURT

MARIA DANIELA LEWIS

Plaintiff

-vs-

WESLEY ALLEN LEWIS

Defendant

Case No. D-10-427054-D

Department P

FMC REQUEST AND ORDER FOR MEDIATION – NRS 3.475

In accordance with NRS 3.475, all individuals filing an answer to a complaint/motion for contested, child-related divorce or post-divorce child-related issues are mandated to attend mediation toward the resolution of custody/access issues. Upon the filing of this order, the plaintiff and defendant shall attend mediation through the FMC court-connected program. The Family Mediation Center will contact both parties using the information provided below. If this information is incorrect, the Court will be informed. The party completing this form must make sure the other party is served and that the Family Mediation Center has received a file-stamped copy.

If either party needs an interpreter, please list language: _____

PLAINTIFF INFORMATION:

Name: MARIA DANIELA LEWIS
Address: 4555 E. Sahara #217
Las Vegas NV 89104

Home Phone: (702) 273-0992
Work Phone: (702) 459-4241
Best time for appt? AM ☐ PM ☒

Attorney's Name: IN PROPER PERSON

Phone Number: 273-0992

DEFENDANT INFORMATION:

Name: WESLEY ALLEN LEWIS
Address: 4650 Idaho St
Las Vegas NV 89104

Home Phone: 525-9490
Work Phone: _____
Best time for appt? AM ☐ PM ☐ ?

Attorney's Name: _____

Phone Number: _____

CHILD(REN) INFORMATION [First & Last Name and Date of Birth (DOB)]:

Name: ISABELLA LEWIS DOB: 8/10/06
Name: _____ DOB: _____

Name: _____ DOB: _____
Name: _____ DOB: _____

JS
Signature of Individual Completing this form

IN PROPER PERSON
Attorney Signature (if Applicable)

Court Use Only

Ordered and dated this 8th day of June, 2010.

Sh Rge
District Judge

(White copy – Court File)
(01/08)

(Canary copy – Family Mediation Center)

ReqOrder (2).doc

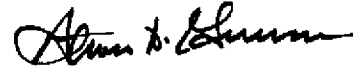
NPTC

LIDIA G. RINCON, ESQ.
Nevada State Bar No. 11763BARBARA E. BUCKLEY, ESQ.
Nevada Bar No.: 3918

LEGAL AID CENTER OF SOUTHERN NEVADA, INC.

800 South Eighth Street
Las Vegas Nevada 89101
(702)386-1070 Ext., 188
(702) 388-1645, FAXlrincon@lacsnsn.org

Attorneys for the Plaintiff



CLERK OF THE COURT

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

Case No.: D-10-427054-D

Dept. No.: "P"

NOTICE OF APPEARANCE OF COUNSEL

TO: WESLEY ALLEN LEWIS, Defendant Herein In Proper Person.

Plaintiff, MARIA DANIELA LEWIS, through counsel, hereby gives notice that Lidia G. Rincon, Esq. of Legal Aid Center of Southern Nevada, Inc. is hereby appearing as counsel for Plaintiff.

DATED this 29th day of November, 2010.

LEGAL AID CENTER OF SOUTHERN NEVADA, INC.

By: 

LIDIA G. RINCON, ESQ.

Nevada Bar No.: 11763

BARBARA E. BUCKLEY, ESQ.

Nevada Bar No.: 3918

800 South Eighth Street

Las Vegas, Nevada 89101

(702) 386-1070, Ext. 188

(702) 388-1645 (Fax)

lrincon@lacsnsn.org

Attorneys for Plaintiff

CERTIFICATE OF MAILING

I DO HEREBY CERTIFY that I am an employee of Legal Aid Center of Southern Nevada, Inc. and that on the 29th day of November, 2010, I placed a true and correct copy of the foregoing NOTICE OF APPEARANCE OF COUNSEL in the United States Mail at Las Vegas, Nevada with first-class postage pre-paid thereon, and addressed to the following person or persons at their last known address:

Wesley A. Lewis
4650 Idaho Ave.
Las Vegas, Nevada 89104
Defendant In Proper Person


An Employee of Legal Aid Center of Southern Nevada, Inc.

ORIGINAL


CLERK OF THE COURT

41

ORIGINAL

Electronically Filed
03/09/2011 01:13:15 PM

District Court

FAMILY DIVISION

CLARK COUNTY, NEVADA

Allen D. Quinn

CLERK OF THE COURT

Maria Daniela Lewis

PLAINTIFF

-vs-

Wesley Allen Lewis

DEFENDANT

CASE NO. D-10-427054-D

DEPARTMENT T

NOTICE OF SEMINAR COMPLETION - EDCR 5.07

PLEASE TAKE NOTICE THAT MARIA DANIELA LEWIS
(Name)

SUCCESSFULLY COMPLETED THE MANDATORY DIVORCE EDUCATION SEMINAR ON

1-26-11

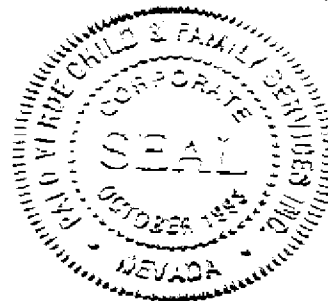
(Date)

Pavel

PROGRAM REPRESENTATIVE

1-26-11

DATE



**Palo Verde Child & Family Services
2780 S. Jones Blvd. # 215
Las Vegas, NV 89146**

DISTRIBUTION: WHITE - Clerk CANARY - Party PINK - Program

Copeform.wpd

Allen D. Lamm

CLARK COUNTY, NEVADA

-VS-

DEPARTMENT T

DEFENDANT

PLEASE TAKE NOTICE THAT

Wesley Allen Lewis
(Name)

SUCCESSFULLY COMPLETED THE MANDATORY DIVORCE EDUCATION SEMINAR ON

(Date)

**PALO VERDE
CHILD & FAMILY SERVICES
2801 S. VALLEY VIEW BLVD
SUITE #10
LAS VEGAS, NV 89102**

PROGRAM REPRESENTATIVE

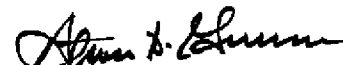
DATE _____



Cociform.wpd

1 NOA

2 ERNEST A. BUCHE, JR., ESQ.
3 Nevada State Bar No. 5235
4 LAW OFFICES OF ERNEST A. BUCHE, JR.
5 A PROFESSIONAL CORPORATION
6 300 E. Charleston Blvd., Ste. 105
7 Las Vegas, Nevada 89104
8 (702) 388-0222
9 Attorney for Defendant



CLERK OF THE COURT

6 DISTRICT COURT
7 FAMILY DIVISION
8 CLARK COUNTY, NEVADA

9 MARIA D. LEWIS,

10 Plaintiff,

11 vs.

12 WESLEY A. LEWIS,

13 Defendant.

) Case No: D-10-427054-D

) Dept. No: T

14 NOTICE OF APPEARANCE

15 TO: MARIA D. LEWIS, Plaintiff and her Attorney, LIDIA RINCON, ESQ.

16 PLEASE TAKE NOTICE that ERNEST A. BUCHE, JR., ESQ., of the Law Offices of
17 ERNEST A. BUCHE, JR. A PROFESSIONAL CORPORATION, hereby enters his appearance
18 as the attorney of record for the Defendant, WESLEY A. LEWIS, in the above-entitled action.
19

20 DATED this 11th day of March 2011.

21 LAW OFFICES OF ERNEST A. BUCHE, JR.
22 A PROFESSIONAL CORPORATION

23 Ernest A Buche Jr

24 ERNEST A. BUCHE, JR., ESQ.
25 Nevada State Bar No. 5235
26 300 E. Charleston Blvd., Ste. 105
27 Las Vegas, Nevada 89104
28 (702) 388-0222
Attorney for Defendant

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ORIGINAL

CODE: FDF

Lidia B. Rincon, Esq.
Nevada Bar No. 11763
LACS# 800 S. 8th St
Las Vegas NV 89101
Attorney For Plaintiff

IN THE FAMILY DIVISION
OF THE Eighth JUDICIAL DISTRICT COURT
IN AND FOR THE COUNTY OF CLARK, STATE OF NEVADA

Maria Daniela Lewis
Plaintiff or Petitioner

Wesley Allen Lewis
Defendant or Respondent

Case No. D-10-427054-D
Electronically Filed
Dept. No. 03/29/2011 10:46:03 AM

Allen D. Blum
CLERK OF THE COURT

FINANCIAL DISCLOSURE FORM

Financial Statement of: MARIA DANIELA LEWIS
First name Middle Last name
Occupation: Executive Ass / Service Rep
Employed by: 24 Hr Fitness From: 10/05/10 To: Present
Previously Employed by: MTA Enterprises From: 10/25/10 To: Present
Age & Date of Birth: 31 yrs 06/05/1979
Level of Education: College
Level of Disability, if Any: N/A
Marriage Date, if Applicable: 06/23/2000
Present Home Address: 4555 E. SAHARA Ave, #212
Las Vegas NV 89104

How many adults (over 18) live with you? 0
How much do you receive from each of them each month? 0
I have paid my attorney a retainer of \$ 0; and his/her hourly rate is \$ 0

I am the Plaintiff/Petitioner Defendant/Respondent in the above action. I swear under penalty of perjury, that the contents of this Financial Disclosure Declaration are true to the best of my knowledge as of this date. I understand that by my signature I verify the material accuracy of the contents. I also understand that any willful misstatements may be contemptuous and could result in my punishment by the Court. I understand I have a duty to supplement this form upon discovering additional assets or debts or upon changed circumstances within 10 days of discovery.

I declare under penalty of perjury that the foregoing and following are true and correct.

Executed on 3/22/11 Signature [Signature]

PERSONAL INCOME SCHEDULE

IF SELF-EMPLOYED OR BUSINESS OWNER PLEASE FILL IN THE
BUSINESS INCOME/EXPENSE SCHEDULE

YOUR OWN INCOME		AMOUNT
EMPLOYMENT INCOME (if paid weekly multiply by 52 and divide by 12, if paid every two weeks, multiply by 26 and divide by 12)		NOTE: ATTACH COPIES OF YOUR THREE MOST RECENT PAY STUBS
1	Average Gross Monthly Income from Employment (all employment income including salary \$ _____ + bonuses \$ _____ + overtime \$ _____ + commissions \$ _____ + tips \$ _____ + other \$ _____ =	1469.98
2	Average Monthly Paycheck Deduction - Income Taxes	93.29
3	Average Monthly Paycheck Deduction - Social Security	66.93
4	Average Monthly Paycheck Deduction - Medicare	23.12
5	Average Monthly Paycheck Deduction - Health Insurance	0
6	Average Monthly Paycheck Deduction - Retirement Plan or 401(k)	0
7	Average Monthly Paycheck Deduction - Savings Account	0
8	Average Monthly Paycheck Deduction(s) - Other	0
9	Total Paycheck Deductions Per Month (Add lines 2-8 above)	183.34
10	Average Net Monthly Income from Employment (Subtract line 9 from line 1)	1,286.64
OTHER INCOME		
11	Monthly Spousal Support/Alimony Awarded by a Court	0
12	Monthly Child Support: court ordered \$ _____ + other/voluntary child support \$ _____ =	0
13	Investment Income (Dividends, interest and capital gains)	0
14	Rental Income (Enter the Amount of Depreciation Claimed in Computing Rental Income Here: \$ _____)	0
15	Retirement Income Including Defined-Benefit Distributions, 401(k) Distributions, military retirement	0
16	Social Security Retirement	0
17	Social Security Disability/military disability	0
18	Supplemental Security Income (SSI)	0
19	Unemployment Benefits	0
20	Workers Compensation Payments	0
21	Other Sources of Income (Describe: such as direct contributions from roommates or indirect payment of expenses by roommates)	0
22	Total Other Income Per Month (Add lines 11-21)	0
23	TOTAL INCOME PER MONTH (Add lines 10 and 22)	1286.64

#1. Job A: 24 hr Fitness :YTD WK#10: 1,157.94 = 501.77 gmi

Job B: Metro Temp Agency :YTD WK#10 : 2234.34 = 968.21 GMI

Case No. D-10-427054-D
 Dept. No. T

PERSONAL EXPENSE SCHEDULE (NOTE: ALL EXPENSES LISTED BELOW SHOULD BE ON AN AVERAGE MONTHLY BASIS annual payments divided by 12, semiannual payments divided by 6, and quarterly payments divided by 3)		TOTAL AMOUNT
1	Mortgage or Rent: 1st Mtg. \$ <u>675.-</u> + 2nd Mtg. \$ _____ + line of credit \$ _____ + taxes \$ _____ + insurance \$ _____ =	675.00
2	Utilities: Gas/Oil \$ <u>35.-</u> + electricity \$ <u>150.-</u> + TV/cable \$ _____ + water & _____ + garbage \$ _____ =	185.00
3	Telephone: landline \$ _____ + cellular \$ <u>50.-</u> + Internet \$ _____ + fax \$ _____ + other \$ _____ =	50.-
4	Food, Groceries & Incidentals (not including entertainment or dining out)	80.-
5	Transportation: monthly payment/lease \$ _____ + gas and oil _____ + repairs and maintenance, tires \$ _____ + insurance \$ _____ + license/registration \$ _____ + parking \$ _____ + public transportation \$ _____ + other \$ _____ =	0
6	House Maintenance: housekeeping \$ _____ + garden/lawn care \$ _____ + snow removal \$ _____ + repairs & maintenance \$ _____ + other \$ _____ =	0
7	Entertainment: dining out \$ _____ + movies, shows \$ _____ + music/videos \$ _____ + other \$ _____ =	0
8	Dues, Memberships, Fees: Professional \$ _____ + memberships (health club, country club) \$ _____ + homeowners \$ _____ + fraternal \$ _____ + business \$ _____ + other \$ _____ =	0
9	Health/exercise: clothing/shoes \$ _____ + fees/passes (health clubs etc.) \$ _____ + other \$ _____ =	0
10	Clothing: self \$ <u>30.-</u> + children \$ <u>30.-</u> + cleaning \$ _____ =	60.-
11	Vacations	0
12	Pets: Food \$ _____ + boarding \$ _____ + healthcare \$ _____ + grooming \$ _____ + other \$ _____ =	0
13	Healthcare: Insurance \$ _____ + unreimbursed; medical \$ _____ + dental \$ _____ + orthodontic \$ _____ + medications \$ _____ + counseling \$ _____ + physical therapy \$ _____ + chiropractic \$ _____ + other \$ _____ =	0
14	Appearance: hair \$ <u>30.-</u> + nails \$ <u>10.-</u> + facials/massage \$ _____ + cosmetics \$ <u>10.-</u> + other \$ _____ =	50.-
15	Insurance: life \$ _____ + disability \$ _____ + other \$ _____ =	0
16	Books, Newspapers & Magazines	3.-
17	Church/Charitable	0
18	Accounting & Tax Preparation	0
19	Support of Others: Ordered Child Support \$ _____ + voluntary child support \$ _____ + court-ordered spousal support \$ _____ + eldercare \$ _____ =	0
20	Miscellaneous: Gifts \$ _____ + storage \$ _____ + flowers \$ _____ + savings \$ _____ + Lawyers fees \$ _____ + other \$ _____ =	0
21	Education: Tuition, Books & Fees \$ <u>75.-</u> + extracurricular \$ _____ + sports \$ _____ + music \$ _____ + other \$ _____ =	75.-
22	Childcare: day care \$ _____ + preschool \$ <u>8.-</u> + other \$ _____ =	8.-
23	Minimum Charge Card Payments and other consumer/installment debt: credit card #1 \$ _____ + credit card #2 \$ _____ + credit card #3 \$ _____ + credit card #4 \$ _____ + other debt \$ _____ =	0
24	TOTAL MONTHLY EXPENSES (Add lines 1-23 above)	1186.00

Case No. D-10-427054-D
Dept. No. T

INCOME/EXPENSE SUMMARY SCHEDULE

Total Monthly Income from Personal Income Schedule Line 23	1286.64
Add: Total Average Net Monthly Income from Self-Employment or Business Schedule Line 30	0
Less: Total Monthly Expenses from Personal Expense Schedule line 24	1186.00
Net Monthly Income or (Loss)	100.64

Case No. D-10-427054-D
 Dept. No. T

ASSET AND DEBT SCHEDULE					
NOTE: PLEASE USE ADDITIONAL ASSET AND DEBT SCHEDULES, AND CARRY TOTALS TO THIS SCHEDULE IF YOU NEED TO LIST ADDITIONAL ASSETS AND DEBTS BEYOND THE LINES PROVIDED ON THIS SCHEDULE.			PROPERTY VALUE (List all assets and debts @ current values)		
Note: In general, Separate Property is defined as that acquired before marriage, or after marriage by gift or inheritance.			TOTAL	COMMUNITY	SEPARATE
				HUSBAND	WIFE
ASSETS					
CASH: Include the last four numbers of the account, and the name and location including the branch of the institution, including CDs.					
1					
2					
3					
4	Subtotal		0	0	
INVESTMENTS: Include mutual funds, stocks, bonds, brokerage accounts, and other investment accounts. Provide the last four numbers of the account, and the name and location including the branch of the institution.					
5					
6					
7					
8	Subtotal		0		
BUSINESS INTERESTS: If you own all or part include. Indicate percentage of ownership here.					
9					
10					
11	Subtotal		0		
RECEIVABLES & DEPOSITS					
12					
13	Subtotal		0		
REAL PROPERTY: Provide common address and type of property, e.g., condominium, townhouse, single family residence, commercial or retail.					
14					
15					
16					
17					
18	Subtotal		0		
AUTOS & RECREATIONAL VEHICLES. Provide make, model, mileage, and vehicle identification number.					
19					
20					
21					
22					
23					
24	Subtotal		0		
PERSONAL PROPERTY: Provide information on furniture, electronics, household goods, tools, computers, artwork, precious metals and jewelry having value of \$500 or greater.					
25					
26					
27					
28					
29					
30					
31					
32					
33					
34					
35	Subtotal		0		

Case No. D-10-427054-3
 Dept. No. T

ASSET AND DEBT SCHEDULE					
NOTE: PLEASE USE ADDITIONAL ASSET AND DEBT SCHEDULES, AND CARRY TOTALS TO THIS SCHEDULE IF YOU NEED TO LIST ADDITIONAL ASSETS AND DEBTS BEYOND THE LINES PROVIDED ON THIS SCHEDULE.		PROPERTY VALUE (List all assets and debts @ current values)			
Note: In general, Separate Property is defined as that acquired before marriage, or after marriage by gift or inheritance.			COMMUNITY	SEPARATE	
		TOTAL		HUSBAND	WIFE
CASH VALUE OF LIFE INSURANCE. Provide information on any loans against the cash surrender value of a life insurance policy.					
36					
37					
38	Subtotal	0			
RETIREMENT ACCOUNTS. Provide the name of the account, account number, an administrator. Provide any information on loans against retirement assets.					
39					
40					
41					
42					
43	Subtotal	0			
44	TOTAL ASSETS (add Lines 4,8,11,13,18,24,35,38 and 43)	0			
DEBT					
LONG TERM DEBT. Provide information on mortgages, notes & deeds of trust, home equity loans and lines of credit, and automobile, recreational vehicle loans and leases.					
45					
46					
47					
48					
49					
50	Subtotal				
OTHER DEBT. Charge accounts, credit cards, medical debts, and other short-term debts. Provide the name of the lender, and the last four numbers of the account.					
51	Nevada Energy	300.-	300.-		
52	Southwest Gas	600.-	600.-		
53					
54					
55					
56					
57					
58					
59	Subtotal	900.-			
60	TOTAL DEBT (add lines 50 and 59)	900.-			
61	NET WORTH (TOTAL ASSETS, line 44 MINUS TOTAL DEBT, line 60)	-900.-			

Case No. 0-10-427054-D
 Dept. No. 7

BUSINESS INCOME/EXPENSE SCHEDULE


(Skip this schedule if you are not self-employed or do not own a business)

AMOUNT PER MONTH

1	Average Monthly Gross Receipts from Self-Employment, Business or Businesses	0
2	Cost of Sales or Cost of Goods Sold (if applicable)	0
3	Gross Profit (Subtract Line 2 from Line 1)	0
4	Advertising	0
5	Car and truck	0
6	Commissions and fees	0
7	Deductible meals	0
8	Depletion	0
9	Depreciation and section 179	0
10	Employee benefit programs	0
11	Entertainment	0
12	Insurance (other than health)	0
13	Interest	0
14	Legal and professional	0
15	Mortgage on building or office space (paid to banks, etc.)	0
16	Office expense	0
17	Other	0
18	Pension and profit-sharing plans	0
19	Rent	0
20	Repairs and maintenance	0
21	Supplies	0
22	Taxes and licenses	0
23	Travel	0
24	Meals	0
25	Utilities	0
26	Wages	0
27	Total Business Expenses Per Month Including Cost of Sales (Add Lines 4-26)	0
28	Average Gross Monthly Income from Self-Employment or Business (Subtract Line 27 from Line 3)	0
29	Average Estimated Tax Payments on a Monthly Basis (Estimated Tax Payments are made on a quarterly basis. As a result, the required quarterly payment would be divided by three to calculate the average monthly estimated tax payment.)	0
30	Average Net Monthly Income from Self-Employment or Business (Subtract Line 29 from Line 28)	0

Note to financial institutions: This electronic representation of Maria Lewis's paycheck was provided from 24 Hour Fitness USA, Inc.'s Payroll WorkCenter system on 3/23/2011.

Done

		03/10/11	D0705324
1265 Laurel Tree Lane Ste 200 Carlsbad CA 92011			
ADVICE OF DEPOSIT			
—		MARIA LEWIS	
—		4555 E SAHARA AVE 217	
—		LAS VEGAS, NV 89104	
NON-NEGOTIABLE			


Employee	ID	Social Security	Status	Exemptions / Allowances	Number
MARIA LEWIS	01074K		US-S / NV-N	US-00 NY-Exempt	D0705324
Code	Peygroup	Division	Department	Hire Date	Period Start
24-HOUR4	1	08	09079	01/05/10	02/16/11
Earnings	Rate	Hours	Units	Dollars	Ytd Dollars
Regular Hourly Pay	8.25	8.55	-	70.54	
Regular Hourly Pay	8.41	2.66	-	21.70	
Overtime - 1.5x	-	-	-	-	
Meeting Pay	-	-	-	-	
Total	-	11.13	-	92.24	1,157.94
Taxes					
Federal Income Tax					
Social Security (FICA)					
Federal Medicare					
Total					
Net Pay					

24 Hour Fitness USA, Inc. - 1265 Laurel Tree Lane Ste 200 Carlsbad, CA 92011

 National Account Services
Following to 10, 20, 30, 40, 50, 60, 70, 80, 90, 100, 110, 120, 130, 140, 150, 160, 170, 180, 190, 200, 210, 220, 230, 240, 250, 260, 270, 280, 290, 300, 310, 320, 330, 340, 350, 360, 370, 380, 390, 400, 410, 420, 430, 440, 450, 460, 470, 480, 490, 500, 510, 520, 530, 540, 550, 560, 570, 580, 590, 600, 610, 620, 630, 640, 650, 660, 670, 680, 690, 700, 710, 720, 730, 740, 750, 760, 770, 780, 790, 800, 810, 820, 830, 840, 850, 860, 870, 880, 890, 900, 910, 920, 930, 940, 950, 960, 970, 980, 990, 1000


Note to financial institutions: This electronic representation of Maria Lewis's paycheck was provided from 24 Hour Fitness USA, Inc.'s Payroll WorkCenter system on 3/23/2011.

Done

		02/25/11	D0691670
1265 Laurel Tree Lane Ste 200 Carlsbad CA 92011			
ADVICE OF DEPOSIT			
<div style="display: flex; justify-content: space-between;"> <div> <p>— MARIA LEWIS</p> <p>— 4565 E SAHARA AVE 217</p> <p>— LAS VEGAS, NV 89104</p> </div> <div> <p>NON-NEGOTIABLE</p> </div> </div>			

Employee	Id	Social Security	Status	Exemptions / Allowances	Number		
MARIA LEWIS	01974K		US-S / NV-N	US-00 NV-Exempt	D0691670		
Code	Paygroup	Division	Department	Hire Date	Period Start	Period End	Pay Date
24HOUR4	1	00	00078	01/05/10	02/01/11	02/15/11	02/25/11
Earnings	Rate	Units	Current	YTD	Paid Time Off		Balance
Regular Pay	8.2500	10.15	83.74	-	Floating Holiday		0.00
Regular Pay	8.4100	23.92	201.17	1049.83	Sick		6.45
Overtime - 1.5x	12.6150	0.10	1.26	5.31	Vacation		21.48
Missing Pay	8.4100	1.25	10.51	19.51			
Total Gross			296.68	1065.70	Direct Deposit Account		Amount
					Checking Account		258.00
Taxes							
Federal Income Tax			20.02	71.08		Current	YTD
Social Security (FICA)			12.46	44.78	W2 Gross Wages	296.68	1065.70
Federal Medicare			4.30	15.48			
Total			37.88	131.79			
Net Pay			259.00	933.91			

24 Hour Fitness USA, Inc. - 1265 Laurel Tree Lane Ste 200 Carlsbad, CA 92011

 **ADP National Account Services**
Sustaining for 10% Service Fee Apply

Note to Financial Institutions: This electronic representation of Maria Lewis's paycheck was provided from 24 Hour Fitness USA, Inc.'s Payroll WorkCenter system on 3/23/2011.

Done



02/10/11

D0677089

1265 Laurel Tree Lane Ste 200
Carlsbad CA 92011


ADVICE OF DEPOSIT

MARIA LEWIS
4555 E SAHARA AVE 217
LAS VEGAS, NV 89104

NON-NEGOTIABLE

Employee	Id	Social Security	Status	Exemptions / Allowances	Number		
MARIA LEWIS	01974K		US-S / NV-N	US-0/0 NV-Exempt	D0677089		
Code	Paygroup	Division	Department	Hire Date	Period Start	Period End	Pay Date
24HOUR4	1	05	00070	01/05/10	01/10/11	01/31/11	02/10/11
Earnings	Rate	Units	Current	YTD	Paid Time Off		Balance
Regular Pay	8.2500	14.47	119.36	-	Floating Holiday		0.00
Regular Pay	8.4100	16.00	134.88	784.88	Sick		6.45
Overtime - 1.5x	12.6150	0.06	0.63	4.04	Vacation		21.48
Total Gross			254.57	789.02			
Taxes					Direct Deposit Accounts		Amount
Federal Income Tax			16.71	50.53	Checking Account		223.48
Social Security (FICA)			10.89	32.30			
Federal Medicare			3.89	11.10	W2 Gross Wages	Current	YTD
Total			31.09	94.11		254.07	789.02
Net Pay			223.48	574.91			

24 Hour Fitness USA, Inc. • 1265 Laurel Tree Lane Ste 200 Carlsbad, CA 92011

 **National Account Services**
Establishing Credit, Accounts and Payment

PERSONAL AND CHECK INFORMATION

MARIA LEWIS
4555 E. SAHARA AVE. #217
LAS VEGAS, NV 89104

Soc Sec #: XXX-XX-XXXX Employee ID: 1133

Hire Date: 10/25/10

Status:

Filing Status: Single, 1
State: NV, Single, 1
Dept: 100

Pay Period: 02/28/11 to 03/06/11
Check Date: 03/11/11 Check #: 51389

NET PAY ALLOCATIONS

DESCRIPTION	CURRENT (\$)	YTD (\$)
Check Amount	213.59	2234.34
Net Pay	213.59	2234.34

EARNINGS

DESCRIPTION	HRS/ UNITS	RATE	CURRENT (\$)	YTD HRS/ UNITS	YTD (\$)
REGULAR	16.00	15.0000	240.00	168.00	2520.00
HOURS WORKED	16.00		240.00	168.00	2520.00
ADJ EARNINGS			240.00	168.00	2520.00
GROSS EARNINGS	16.00		240.00	168.00	2520.00

WITHHOLDINGS

DESCRIPTION	CURRENT (\$)	YTD (\$)
FEDERAL WITH	12.85	143.25
OASDI	10.06	105.84
MEDICARE	3.48	38.57
TOTAL	26.41	285.86

NET PAY

CURRENT (\$)	YTD (\$)
213.59	2234.34

Payroll by Paychex, Inc.

047-7066 METRO TEMP AGENCY ■ 2235 E FLAMINGO STE A-1 ■ LAS VEGAS, NV 89119 ■

EARNINGS

PERSONAL AND CHECK INFORMATION
 MARIA LEWIS
 4555 E. SAHARA AVE. #217
 LAS VEGAS, NV 89104
 Soc Sec #: XXX-XX-XXXX Employee ID: 1133
 Hire Date: 10/25/10
 Status:
 Filing Status:
 Federal: Single, 1
 State: NV, Single, 1
 Dept: 100

Pay Period: 02/07/11 to 02/13/11
 Check Date: 02/18/11 Check #: 51254

NET PAY ALLOCATIONS

DESCRIPTION	CURRENT (\$)	YTD (\$)
Check Amount	238.89	1545.72
Net Pay	238.89	1545.72

WITHHOLDINGS

DESCRIPTION	HR/ UNITS	RATE	CURRENT (\$)	YTD HR/ UNITS	YTD (\$)
REGULAR	18.00	16.0000	270.00	118.00	1740.00
HOURS WORKED	18.00		270.00	118.00	1740.00
ADJ EARNINGS			270.00	118.00	1740.00
GROSS EARNINGS	18.00		270.00	118.00	1740.00

DESCRIPTION	CURRENT (\$)	YTD (\$)
FEDERAL W/H	15.86	96.86
OASDI	11.34	73.08
MEDICARE	3.92	25.25
TOTAL	31.11	194.28

NET PAY

CURRENT (\$)	YTD (\$)
238.89	1545.72

Payroll by Paychex, Inc.
 0677-7088 METRO TEMP AGENCY ■ 2235 E FLAMINGO STE A-1 ■ LAS VEGAS, NV 89119 ■

CERT**LIDIA G. RINCON, ESQ.**

Nevada Bar No.: 11763

BARBARA E. BUCKLEY, ESQ.

Nevada Bar No.: 3918

LEGAL AID CENTER OF SOUTHERN NEVADA, INC.

800 South Eighth Street

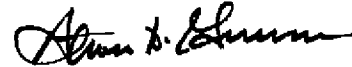
Las Vegas, Nevada 89101

(702) 386-1070, Ext. #188

(702) 388-1645 (Fax)

lrincon@lacsns.org

Attorneys for Plaintiff



CLERK OF THE COURT

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

MARIA DANIELA LEWIS,

Plaintiff,

vs.

Case No.: D-10-427054-D

Dept. No.: "P"

WESLEY ALLEN LEWIS,

Defendant.

CERTIFICATE OF MAILING

I DO HEREBY CERTIFY that I am an employee of Legal Aid Center of Southern Nevada, Inc., and that on the 29th day of March, 2011, I placed a true and correct copy of the PLAINTIFF'S FINANCIAL DISCLOSURE FORM dated 3/22/11, and PLAINTIFF'S FINANCIAL DISCLOSURE FORM dated 6/2/10, in the United States Mail, in Las Vegas, Nevada, with First Class Postage Pre-Paid thereon, and addressed to the following person or persons at their last known address:

Ernest A. Buche, Jr., Esq.
300 E. Charleston Blvd, Suite #105
Las Vegas, Nevada 89104
Attorney for Defendant


An Employee of Legal Aid Center of Southern Nevada, Inc.



CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA
* * * *

MARIA DANIELA LEWIS, PLAINTIFF.

VS.

WESLEY ALLEN LEWIS,
DEFENDANT.

CASE NO: D-10-427054-D
DEPARTMENT T

NRCP 16.2 CASE MANAGEMENT CONFERENCE

**Lidia G Rincon, Esq., Attorney for
Maria Daniela Lewis**

**Ernest A Buche, Jr., Esq., Attorney for
Wesley Allen Lewis**

Please be advised that, in accordance with NRCP 16.2, the above-entitled matter has been scheduled for a Case Management Conference to be heard by the Honorable Gayle Nathan, at the Regional Justice Center, 200 Lewis Ave, Las Vegas, Nevada, 89155, on the 26th day of May, 2011, at the hour of 2:00 PM, in Department T.

YOUR PRESENCE IS NECESSARY.

HONORABLE GAYLE NATHAN

By: 

Caryne Pierce
Judicial Executive Assistant


CERTIFICATE OF MAILING

I here certify that on the 6th day of April, 2011:

☒ I mailed, via first-class mail, postage fully prepaid, the foregoing Notice of Case Management Conference to:

Adriana Rincon, Esq.
1904 S. Maryland Pkwy.
Las Vegas, NV. 89104

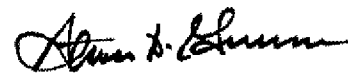
Ernest Buche, Jr., Esq.
300 E. Charleston Blvd., Suite 105
Las Vegas, NV. 89104


Caryne Pierce
Judicial Executive Assistant
Department I

FDF

LAW OFFICE OF ERNEST A BUCHE, JR.
 Ernest A. Buche, Jr., Esq.
 Nevada Bar No. 5235
 300 E. Charleston Blvd., Ste. 105
 Las Vegas, Nevada 89104
 (702) 388-0222
 Attorney for Plaintiff

Electronically Filed
 05/25/2011 10:28:01 AM


 CLERK OF THE COURT

EIGHTH JUDICIAL DISTRICT COURT
 CLARK COUNTY, NEVADA

MARIA D. LEWIS

Plaintiff,

vs.

WESLEY A. LEWIS

Defendant.

Case No. D-10-427054-D

Dept. No. T

FINANCIAL DISCLOSURE FORM

Financial Statement of: Westley Allen Lewis
 First Name Middle Last Name

Occupation: Retail Sales

Employed by: Gregory's From: Dec-10 To: Present

Previously Employed by: True Religion From: Mar-10 To: Sep-10

Age & Date of Birth: 33; July 23, 1977

Level of Education: High School Diploma

Level of Disability, If Any: N/A

Marriage Date, If Applicable: June 25, 2006

Present Home Address: 4650 Idaho Street, Las Vegas, Nevada 89104

How many adults (over 18) live with you? 2

How much do you receive from each of them each month? \$0.00

I have paid my attorney a retainer of \$2,000.00; I am billed at the hourly rate of \$175

I am the Plaintiff X Defendant in the above action. I swear under penalty of perjury, that the contents of this Financial Declaration are true to the best of my knowledge as of this date. I understand that by my signature I verify the material accuracy of the contents. I also understand that any willful misstatements may be contemptuous and could result in my punishment by the Court. I understand I have a duty to supplement this form upon discovering additional assets or debts or upon changed circumstances within 10 days of discovery.

I declare under penalty of perjury that the foregoing and following are true and correct.

Executed: MAY 24, 2011

Signature: 

PERSONAL INCOME SCHEDULE**IF SELF-EMPLOYED OR BUSINESS OWNER PLEASE FILL IN THE BUSINESS
INCOME/EXPENSE SCHEDULE****YOUR OWN INCOME****AMOUNT****EMPLOYMENT INCOME** (if paid weekly multiply by 52 and divide by 12; if paid every
two weeks, multiply by 26 and divide by 12)NOTE: ATTACH
COPIES OF YOUR
THREE MOST
RECENT PAY
STUBS.

1	Average Gross Monthly Income from Employment (all employment income including							
	salary	\$2,909.00	+ bonuses	\$1,001.00	+ overtime	\$0.00	+ commissions	\$0.00
2	tips	\$0.00	+ other					\$3,910.00
3	Average Monthly Paycheck Deduction Income Taxes							\$486.50
4	Average Monthly Paycheck Deduction Social Security							\$164.23
5	Average Monthly Paycheck Deduction Medicare							\$56.70
6	Average Monthly Paycheck Deduction Health Insurance							\$0.00
7	Average Monthly Paycheck Deduction Retirement Plan or 401(k)							\$0.00
8	Average Monthly Paycheck Deduction Savings Account							\$0.00
9	Average Monthly Paycheck Deduction(s)-Other							\$0.00
9	Total Paycheck Deductions per Month (Add lines 2-8 above)							\$707.43
10	Average Net Monthly Income from Employment (Subtract line 9 from line 1)							\$3,202.57
OTHER INCOME								
11	Monthly Spousal Support/Alimony Awarded by a Court							\$0.00
12	Monthly Child Support:	court ordered	\$0.00	+ other/voluntary child support	\$0.00			\$0.00
13	Investment Income (Dividends, Interest and capital gains)							\$0.00
14	Rental Income (Enter the Amount of Depreciation Claimed in Computing Rental Income Here: \$ _____)							\$0.00
15	Retirement Income Including Defined-Benefit Distributions, 401(k) Distributions, military retirement							\$0.00
16	Social Security Retirement							\$0.00
17	Social Security Disability/military disability							\$0.00
18	Supplemental Security Income (SSI)							\$0.00
19	Unemployment Benefits							\$0.00
20	Workers Compensation Payments							\$0.00
21	Add back elective deferrals							\$0.00
22	Other Sources of Income (Describe: such as direct contributions from roommates or indirect payment of expenses by roommates)							\$0.00
23	Total Other Income Per Month (Add lines 11-21)							\$0.00
24	TOTAL INCOME PER MONTH (Add lines 10 and 22)							\$3,202.57

PERSONAL EXPENSE SCHEDULE (NOTE: ALL EXPENSES LISTED BELOW SHOULD BE ON AN AVERAGE MONTHLY BASIS: annual payments divided by 12; semiannual payments divided by 6; and quarterly payments divided by 3)								TOTAL AMOUNT
1	Mortgage or Rent:	1st Mtg. \$800	+ 2nd Mtg. \$0	+ line of credit \$0				\$800.00
		taxes \$0	+ insurance \$0					
2	Utilities:	Gas/Oil \$80	+ electricity \$130	+ TV/cable \$0				\$250.00
		Water \$20	+ garbage \$0					
3	Telephones:	landline \$0	+ cellular \$100	+ internet \$0				\$100.00
		fax \$0	+ other \$0					
4	Food, Groceries & Incidentals (not including)							\$400.00
5	Transportation:	monthly payment/lease \$0	+ gas & oil \$200	+ repairs/tires maintenance \$50	+ insurance \$130			\$400.00
		license/reg \$20	+ parking \$0	+ public trans \$0	+ other \$0			
6	House Maintenance:	housekeeping \$0	+ garden/lawn care \$0	+ snow removal \$0				\$0.00
		repairs/maint. \$0	+ other \$0					
7	Entertainment:	dining out \$100	+ movies/shows \$50	+ music/videos \$0				\$150.00
		other \$0						
8	Dues, Memberships, Fees:	Professional \$0	+ memberships (health club country club) \$0	+ homeowners \$0				\$0.00
		fraternal \$0	+ business \$0	+ other \$0				
9	Health/exercise:	clothing/shoes \$0	+ fees/passes (health clubs etc.) \$0	+ other \$0				\$0.00
10	Clothing:	self \$50	+ children \$100	+ cleaning \$0				\$150.00
11	Vacations							\$100.00
12	Pets:	food \$50	+ boarding \$0	+ healthcare \$5				\$75.00
		grooming \$20	+ other \$0					
13	Healthcare:	insurance \$217	+ unreimbursed medical \$0	+ dental \$0	+ orthodontic \$0			\$217.00
		medications \$0	+ counseling \$0	+ physical therapy \$0	+ chiropractic \$0			
14	Appearance:	hair \$50	+ nails \$0	+ facials/massage \$0				\$50.00
		cosmetics \$0	+ other \$0					
15	Insurance:	life \$0	+ disability \$0	+ other \$0				\$0.00
16	Books, Newspapers & Magazines:							\$0.00
17	Church/Charitable:							\$50.00
18	Accounting & Tax Preparation							\$0.00
19	Support of Others:	ordered child support \$0	+ voluntary child support \$0	+ court ordered spousal support \$0	+ eldercare \$0			\$0.00
20	Miscellaneous:	gifts \$0	+ storage \$0	+ savings \$0				\$400.00
		lawyers fees \$400	+ other \$0					
21	Education:	tuition, books & fees \$0	+ extracurricular \$0	+ sports \$0				\$110.00
		music \$0	+ other \$110					
22	Childcare:	daycare \$200	+ preschool \$0	+ other \$0				\$200.00
23	Minimum charge card payments & other consumer/ installment debt:	credit card #1 \$0	+ credit card #2 \$0	+ credit card #3 \$0				\$0.00
		credit card #4 \$0	+ other debt \$0					
24	TOTAL MONTHLY EXPENSES (Add lines 1-23 above)							\$3,452.00

Case No. _____
Dept. No. _____

INCOME/EXPENSE SUMMARY SCHEDULE

Total Monthly Income from Personal Income Schedule Line
23

\$3,202.57

Add: Total Average Net Monthly Income from Self-
Employment or Business Schedule Line 30

\$0.00

Less: Total Monthly Expenses from Personal Expense
Schedule line 24

\$3,452.00

Net Monthly Income or (Loss)

(\$249.43)

ASSET AND DEBT SCHEDULE

NOTE: PLEASE USE ADDITIONAL ASSET AND DEBT SCHEDULES, AND CARRY TOTALS TO THIS SCHEDULE IF YOU NEED TO LIST ADDITIONAL ASSETS AND DEBTS BEYOND THE LINES PROVIDED ON THIS SCHEDULE.		PROPERTY VALUE (List all assets and debts @ current FMV)			
Note: In general, Separate Property is defined as that acquired before marriage, or after marriage by gift or inheritance			COMMUNITY	SEPARATE	
		TOTAL		HUSBAND	WIFE
ASSETS					
CASH: Include the last four numbers of the account, and the name and location including the branch of the institution, including CDs.					
1	Slage Employees Credit Union - Saving	\$25			
2					
3					
4	Subtotal	\$25	\$0	\$0	\$0
INVESTMENTS: Include mutual funds, stocks, bonds, brokerage accounts, and other investment accounts. Provide the last four numbers of the account, and the name and location including the branch of the institution.					
5	None				
6					
7					
8	Subtotal	\$0	\$0	\$0	\$0
BUSINESS INTERESTS: If you own all or part include. Indicate percentage of ownership here.					
9	None				
10					
11	Subtotal	\$0	\$0	\$0	\$0
RECEIVABLES & DEPOSITS					
12	None				
13	Subtotal	\$0	\$0	\$0	\$0
REAL PROPERTY: Provide common address and type of property e.g. condominium, townhouse, single-family residence, commercial or retail.					
14	None				
15					
16					
17					
18	Subtotal	\$0	\$0	\$0	\$0
AUTOS & RECREATIONAL VEHICLES: Provide make, model, mileage and vehicle identification number.					
19	2001 Toyota Rav	\$1,000			
20					
21					
22					
23					
24	Subtotal	\$1,000	\$0	\$0	\$0
PERSONAL PROPERTY: Provide information on furniture, electronics, household goods, tools, computers, artwork, precious metals and jewelry having a value of \$500 or greater.					
25	Estimated Value of Household Furniture	\$1,500			
26					
27					
28					
29					
30					
31					
32					
34	Subtotal	\$1,500	\$0	\$0	\$0

ASSET AND DEBT SCHEDULE

NOTE: PLEASE USE ADDITIONAL ASSET AND DEBT SCHEDULES, AND CARRY TOTALS TO THIS SCHEDULE IF YOU NEED TO LIST ADDITIONAL ASSETS AND DEBTS BEYOND THE LINES PROVIDED ON THIS SCHEDULE.		PROPERTY VALUE (List all assets and debts @ current FMV)			
Note: In general, Separate Property is defined as that acquired before marriage, or after marriage by gift or inheritance		TOTAL	COMMUNITY	SEPARATE	
				HUSBAND	WIFE
CASH VALUE OF LIFE INSURANCE: Provide information on any loans against the cash surrender value of a life insurance policy					
35	None				
36					
37	Subtotal	\$0	\$0	\$0	\$0
RETIREMENT ACCOUNTS: Provide the name of the account; account number; an administrator. Provide any information on loans against retirement assets					
38	None				
39					
40					
41					
42	Subtotal	\$0	\$0	\$0	\$0
43	TOTAL ASSETS (add lines 4,8,11,13,18,24,35,38, and 43)	\$2,525	\$0	\$0	\$0
DEBT					
LONG TERM DEBT: Provide information on mortgages, notes & deeds of trust, home equity loans and lines of credit, and automobile, recreational vehicle loans and leases					
44	City Mortgage	\$160,000			
45					
46					
47					
48					
49	Subtotal	\$160,000	\$0	\$0	\$0
OTHER DEBT: Charge Accounts, Credit Cards, medical debts, and other short-term debts. Provide the name of the lender, and the last four numbers of the account					
50	Home Depot	\$1,500			
51	Sears Club	\$750			
52					
53					
54					
55					
56					
57					
58	Subtotal	\$2,250	\$0	\$0	\$0
59	TOTAL DEBT (add lines 50 and 59)	\$162,250	\$0	\$0	\$0
60	NET WORTH (TOTAL ASSETS, line 44 MINUS TOTAL DEBT, line 60)	\$159,725	\$0	\$0	\$0

BUSINESS INCOME/EXPENSE SCHEDULE (Skip this schedule if you are not self-employed or do not own a business.)		AMOUNT PER MONTH
1	Average Monthly Gross Receipts from Self-Employment, Business or Businesses	\$0
2	Cost of Sales or Cost of Goods Sold (if applicable)	\$0
3	Gross Profit (Subtract Line 2 from Line 1)	\$0
4	Advertising	\$0
5	Car and truck	\$0
6	Commissions and fees	\$0
7	Deductible meals	\$0
8	Depletion	\$0
9	Depreciation and section 179	\$0
10	Employee benefit programs	\$0
11	entertainment	\$0
12	Insurance (other than health)	\$0
13	Interest	\$0
14	Legal and professional	\$0
15	Mortgage on building or office space (paid to banks, etc.)	\$0
16	Office expense	\$0
17	Other	\$0
18	Pension and profit-sharing plans	\$0
19	Rent	\$0
20	Repairs and maintenance	\$0
21	Supplies	\$0
22	Taxes and licenses	\$0
23	Travel	\$0
24	Meals	\$0
25	Utilities	\$0
26	Wages	\$0
27	Total Business Expenses Per Month Including Cost of Sales (Add Lines 4-26)	\$0
28	Average Gross Monthly Income from Self-Employment or Business (Subtract Line 27 from line 3)	\$0
29	Average Estimated Tax Payments on a Monthly Basis (Estimated Tax Payments are made on a quarterly basis. As a result, the required quarterly payment would be divided by three to calculate the average monthly estimated tax payment).	
30	Average Net Monthly Income from Self-Employment or Business (Subtract Line 29 from Line 28)	\$0

LV GREGORYS TX, LLC / dba Gregory's

2089

Employee					SSN	Status (Fed/State)	Allowances/Extra
Wesley Lewis, 4650 Idaho Ave., Las Vegas, NV 89104					***-**-7093	Single/(none)	Fed-1/0/NV-0/0
					Pay Period: 02/26/2011 - 03/11/2011		Pay Date: 03/15/2011
Earnings and Hours	Qty	Rate	Current	YTD Amount			
Hourly	80.00	15.00	1,200.00	7,017.00			
Commission 5%	11,175.00	5.00%	558.75	1,255.75			
Commission 4%	6,478.00	4.00%	259.12	1,565.48			
			2,017.87	9,838.23			
Taxes			Current	YTD Amount			
Federal Withholding			-300.00	-1,273.00			
Social Security Employee			-84.75	-413.21			
Medicare Employee			-29.25	-142.65			
			-414.00	-1,828.86			
Net Pay			1,603.87	8,009.37			

LV Gregory's TX, LLC, 4887 Alpha Rd., Ste 205, Dallas, TX 75244 972-934-8578

LV GREGORYS TX, LLC / dba Gregory's

2038

Employee					SSN	Status (Fed/State)	Allowances/Extra
Wesley Lewis, 4650 Idaho Ave., Las Vegas, NV 89104					***-**-7093	Single/(none)	Fed-1/0/NV-0/0
					Pay Period: 02/12/2011 - 02/25/2011		Pay Date: 03/02/2011
Earnings and Hours		Qty	Rate	Current	YTD Amount		
Hourly		75.00	15.00	1,125.00	5,817.00		
Commission 5%		1,490.00	5.00%	74.50	697.00		
Commission 4%		5,373.00	4.00%	214.92	1,306.36		
				1,414.42	7,820.36		
Taxes				Current	YTD Amount		
Federal Withholding				-162.00	-973.00		
Social Security Employee				-59.41	-328.48		
Medicare Employee				-20.51	-113.40		
				-241.92	-1,414.88		
Net Pay				1,172.50	6,405.50		

LV Gregory's TX, LLC, 4687 Alpha Rd., Ste 205, Dallas, TX 75244 972-934-8576

LV GREGORYS TX, LLC / dba Gregory's

2020

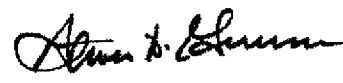
Employee					SSN	Status (Fed/State)	Allowances/Extra
Wesley Lewis, 4650 Idaho Ave., Las Vegas, NV 89104					***-7093	Single/(none)	Fed-1/0/NV-0/0
					Pay Period: 01/29/2011 - 02/11/2011		Pay Date: 02/16/2011
Earnings and Hours		Qty	Rate	Current	YTD Amount		
Hourly		77.08	15.00	1,157.00	4,692.00		
Commission 5%		547.00	5.00%	27.35	822.50		
Commission 4%		1,969.00	4.00%	78.76	1,091.44		
				1,263.11	6,405.94		
Taxes				Current	YTD Amount		
Federal Withholding				-140.00	-811.00		
Social Security Employee				-53.05	-269.05		
Medicare Employee				-18.32	-92.06		
				-211.37	-1,172.94		
Net Pay				1,051.74	5,233.00		

LV Gregory's TX, LLC, 4887 Alpha Rd., Ste 205, Dallas, TX 75244 972-934 8575

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ERNEST A. BUCHE, JR., ESQ.
Nevada State Bar No. 5235
LAW OFFICES OF ERNEST A. BUCHE, JR.
A PROFESSIONAL CORPORATION
300 E. Charleston Blvd., Ste. 105
Las Vegas, Nevada 89104
(702) 388-0222
Attorney for Defendant


CLERK OF THE COURT

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

MARIA D. LEWIS,
Plaintiff,

Case No: D-10-427054-D
Dept. No: T

vs.

WESLEY A. LEWIS,
Defendant.

CERTIFICATE OF FACSIMILE AND MAILING

I hereby certify that on the 25th day of May, 2011, I faxed and mailed a true and complete copy of the **Defendant's Financial Disclosure Form** first-class postage fully prepaid thereon, by placing the same in the United States Mail at Las Vegas, Nevada, addressed as follows:

Legal Aid Center of Southern Nevada
Attention: Lidia Rincon, Esq.
800 So. Eighth Street
Las Vegas, Nevada 89104
Fax No. (702) 366-0569
Attorney for Plaintiff


An employee of ERNEST A. BUCHE, JR.
A Professional Corporation

ORIGINAL

May 26 2011

STEVEN D. GRIERSON
CLERK OF THE COURTDISTRICT COURT
CLARK COUNTY, NEVADABy Lucinda A. Tait
DEPUTY

MARIA D. LEWIS,

LUCINDA A. TAIT

Plaintiff

vs

Case No. D10427054D

Department No. B-1

WESLEY A. LEWIS,

Defendant

PARENTING AGREEMENTDate of Hearing: ~~Not Set~~

5/26/11

Time of Hearing: ~~Not Set~~

2:00 pm

The parents have met in mediation and have agreed to a Parenting Agreement. The intent of this Parenting Agreement is to promote healthy relationships between the child, Isabella Lewis, DOB: 8-10-06, and her parents. Each of the parents, Maria Lewis, natural mother, and Wesley Lewis, natural father, agree that co-parenting requires the acceptance of mutual responsibilities and rights as far as the child is concerned.

LEGAL CUSTODY PROVISIONS

Legal custody addresses the issues and matters including, but not limited to, the health, education, religious upbringing, and welfare of the child.

The parents agree to share joint legal custody of the child named above.

The parents agree to provide each other with the names, addresses, telephone numbers of medical, educational, child care, and other providers of professional services for the child. Should this information change, each parent agrees to provide notification in advance, or as soon as possible, to the other parent.

7

1 Both parents are entitled to have access to medical information (both emergency and
2 routine), school records, and to consult with any and all professionals involved with the child. The
3 parents agree that each parent shall be empowered to obtain emergency health care for the child
4 without the consent of the other parent. The parents agree to notify the other parent as soon as
5 reasonably possible of any illness requiring medical attention or any emergency involving the child.
6

7 OBTAINING INFORMATION

8 The parents agree to provide each other with the address and telephone number at
9 which the child resides.

10 The parents agree to notify each other, and the Clerk of the Court, in writing at least
11 ten (10) days prior to changing residences, phone numbers, or employment.
12

13 The parents agree to provide each other, upon receipt, information concerning the
14 well-being of the child, including, but not limited to, school information, activities involving the
15 child, and all communications from health care providers.

16 The parents agree to advise each other of school, athletic, and social events in which
17 the child participates, and both parents may participate in activities for the child.
18

19 PHYSICAL CUSTODY PROVISIONS

20 Physical custody addresses the residential arrangements and specific periods of
21 parental responsibilities for the child. The parents shall maintain joint physical custody of the child,
22 which entails the following:

23 The parents agree that the child shall reside with the mother each week from
24 Thursday at 9:00 a.m. until Sunday at 7:30 p.m. and with the father each week from Sunday at
25 7:30 p.m. until Thursday at 9:00 a.m. Sunday evening from 7:30 p.m. until Monday at 9:00 a.m.
26 shall be alternated between the parents, such that on alternate weeks the child spends three
27
28

1 overnights in the mother's care and four overnights in the father's care. On the opposite weeks, she
2 spends four overnights in the mother's care and three overnights in the father's care.

3 HOLIDAYS

4 Holidays and special times shall take precedence over all other time-share
5 arrangements.
6

7 Mother's/Father's Day

8 The parents agree that Mother's/Father's Day shall begin the day before the holiday
9 at 10:00 p.m. and end on the holiday at 7:30 p.m. The mother shall have the child each year on
10 Mother's Day, and the father shall have the child each year on Father's Day.
11

12 Parents' Birthdays

13 The parents agree that Mother's/Father's Birthday shall begin on the birthday at
14 10:00 a.m. and end on the birthday at 7:30 p.m. The parents shall have the child each year on their
15 respective birthdays.
16

17 Child's Birthday

18 The parents agree to follow the routine time-share arrangement on the child's
19 birthday. The other parent shall have the child for three (3) hours on the birthday with arrangements
20 for the specific times to be made between the parents by mutual agreement, seven (7) days in
21 advance.
22

23 New Year's Holiday

24 The parents agree that New Year's holiday shall be defined as beginning
25 December 31 at 5:00 p.m. and concluding January 1 at 5:00 p.m. New Year's holiday shall be
26 alternated on a yearly basis, with the child residing with the father in odd-numbered years and with
27
28

1 the mother in even-numbered years. Odd and even-numbered years shall be determined by
2 December 31.

3 Halloween

4 The parents agree that beginning in 2011 and thereafter, Halloween shall be defined
5 as beginning October 31 at 10:00 a.m. and concluding October 31 at 10:00 p.m. Halloween shall be
6 alternated on a yearly basis, with the child residing with the mother in odd-numbered years and with
7 the father in even-numbered years.

8 Veteran's Day

9 The parents agree that Veteran's Day shall be defined as beginning November 10 at
10 10:00 p.m. and concluding November 11 at 7:30 p.m. The child shall reside with the father each
11 year on Veteran's Day.

12 Thanksgiving

13 The parents agree that Thanksgiving shall be defined as beginning the day before the
14 holiday at 10:00 p.m. and concluding the Sunday after the holiday at 7:30 p.m. The child shall reside
15 with the mother each year on Thanksgiving.

16 Christmas

17 The parents agree that Christmas shall be divided into two periods. The first period
18 shall begin December 24 at noon and end December 25 at noon. The second period shall begin
19 December 25 at noon and end December 26 at noon. These periods shall be alternated yearly
20 between the parents. In odd-numbered years, the child shall reside with the father during the first
21 period and with the mother during the second period. In even-numbered years, the child shall reside
22 with the mother during the first period and with the father during the second period.

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The parents agree that provided it causes no disruption to the child's schooling, they shall each be allowed to have the child during their respective vacations with thirty (30) days advance notice to the other parent.

The parents agree that any additional time with the child or changes in the parenting schedule shall be arranged by mutual agreement.

The parents agree that in the event any scheduled time cannot be kept due to illness or an emergency involving the child and/or the parent, the parent unable to comply with the schedule will notify the other parent and child as soon as possible.

TRANSPORTATION

The parents agree to use self-control and not verbally or physically abuse each other in front of the child.

5

1 agree that routine exchanges of information shall be accomplished through email. Emergencies or
2 information of a time-sensitive (defined as an event taking place within that week) shall be
3 accomplished with one telephone call to the other parent.

4 The parents agree to share itinerary information when traveling out-of-state, to
5 include dates of travel, destination, and an emergency contact number. If traveling outside of the
6 country, each parent must have a notarized letter of consent from the other parent.

8 The parents agree that the father and child shall obtain passports, so that the child can
9 travel internationally with each parent. International travel shall require that the child be with one of
10 the parents during the travel. The parents agree to keep the child's passport in a safe deposit box
11 that will be accessible to each parent.

13 The parents agree they shall be entitled to reasonable telephone communication with
14 the child. They further agree to refrain from interfering with the child's right to privacy during such
15 telephone conversations.

16 The parents agree that shall each provide the child with appropriate housing and
17 sleeping accommodations.

19 The parents agree that should either parent require additional child care for a period
20 of three (3) hours or more while the child is in their care, the other parent shall be given the first
21 opportunity to provide such care for the child.

22 REMOVING THE CHILD FROM THE STATE

23 The parents agree that neither parent shall remove the child from the state of Nevada
24 for the purpose of changing the child's residence without the written consent of both parents or until
25 further Order of the Court. However, this does not preclude the child from participating in out-of-
26 state family activities.

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LIDIA G. RINCON, ESQ.

Nevada Bar No.: 11763

BARBARA E. BUCKLEY, ESQ.

Nevada Bar No.: 3918

LEGAL AID CENTER OF SOUTHERN NEVADA, INC.

800 South Eighth Street

Las Vegas, Nevada 89101

(702) 386-1070, Ext. 188

(702) 388-1645 FAX

lrincon@lacsu.org

Attorneys for Plaintiff

CLERK OF THE COURT

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

MARIA DANIELA LEWIS,

Plaintiff,

v.

WESLEY ALLEN LEWIS,

Defendant.

Case No: D-10-427054-D

Dept. No.: T

DATE OF HEARING: May 26, 2011

TIME OF HEARING: 2:00 p.m.

DECREE OF DIVORCE

THIS CAUSE coming on a Case Management Conference before the above-entitled court, Plaintiff MARIA DANIELA LEWIS (hereinafter "Plaintiff" or "Mother") appearing

personally with her attorney of record Lidia G. Rincon, Esq. of LEGAL AID CENTER OF SOUTHERN NEVADA, INC., and Defendant WESLEY ALLEN LEWIS (hereinafter

"Defendant" or "Father") appearing personally with his attorney of record Ernest A. Buche, Jr.,

Esq.. The Court, after reviewing the pleadings and papers on file and hearing argument from the

parties hereby FINDS and enters this DECREE OF DIVORCE as follows:

DISPOSITIONS

- ☐ Converted from
- ☐ Blackstone
- ☐ Involuntary
- ☐ Dismissal
- ☐ Transferred
- ☐ Voluntary
- ☐ Dismissal
- ☐ Decision w/out
- ☐ Trial/Hearing
- ☒ Decision w/
- ☐ Hearing
- ☐ Decision w/
- ☐ Trial/Evidentiary
- ☐ Hearing
- ☐ Summary
- ☐ Order
- ☐ Terminating
- ☐ Guardianship
- ☐ Final

RECEIVED

JUL 01 2011

FAMILY COURT
DEPARTMENT T

1 That the Court has complete jurisdiction in the premises, both as to the subject matter
2 thereof as well as the parties hereto; that Plaintiff is now and has been an actual bona fide
3 resident of Clark County, Nevada and has been actually domiciled therein for more than six (6)
4 weeks immediately preceding the commencement of this action; that the parties were married on
5 the 23rd day of June, 2006 in Las Vegas, Nevada.

6
7 That there is one (1) minor child who is the issue of this marriage, or was adopted by the
8 parties and Plaintiff is not currently pregnant. The name and date of birth of the child is:
9 ISABELLA SARA LEWIS, born August 10, 2006. Since 2006, the child's habitual state of
10 residence has been Nevada.

11
12 That the parties have reached and executed a complete Parenting Agreement through
13 Family Mediation Center ("FMC") and said Parenting Agreement has been filed, affirmed and
14 adopted by this Court. That pursuant to the Parenting Agreement the parties have agreed to joint
15 legal custody and joint physical custody of the minor child, ISABELLA SARA LEWIS, born
16 August 10, 2006.

17
18 That the Court binds Defendant to the Financial Disclosure Form he signed on May 24,
19 2011. That after a review of the parties' Financial Disclosure Forms ("FDF") and because the
20 parties share joint physical custody, the Court finds that the Father's obligation to Mother for
21 child support should be \$440.00 per month, effective June, 2011.

22
23 That Defendant should maintain medical and dental insurance for the minor child which
24 he is currently paying. Defendant should be awarded an offset in the amount of one-half (1/2) of
25 the cost of the insurance for the minor child upon proof of the cost to Counsel. The adjusted
26 amount for child support should be entered into the Order.

27 /
28

1 That upon a review of the mother's FDF the Court finds that the mother has two (2) part-
2 time jobs.

3 That upon stipulation of the parties each party should take his and her own personal
4 property.

5 That upon stipulation of the parties each party should be responsible for his and her own
6 debt and each should indemnify and hold the other harmless thereon.

7 That upon stipulation of the parties the Father should claim the minor child for tax
8 purposes in even years and the Mother should claim the minor child in odd years.

9 That neither party should be awarded spousal support.

10 That Plaintiff MARIA DANIELA LEWIS should have her former or maiden name of
11 MARIA DANIELA PERDOMO restored to her.

12 That each party should pay their own attorney's fees.

13 That Plaintiff should be granted a Decree of Divorce upon the grounds set forth in the
14 Complaint.

15 Therefore, **IT IS ORDERED, ADJUDGED AND DECREED** that the bonds of
16 matrimony now and heretofore existing between the parties are hereby wholly dissolved, set
17 aside and forever held for naught, and an absolute Decree of Divorce is hereby granted upon the
18 grounds set forth in the Complaint for Divorce to the parties, and each of the parties is hereby
19 restored to the status of a single, unmarried person.

20 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Parenting
21 Agreement executed by the parties and attached hereto as Exhibit A shall be Affirmed and
22 Adopted by the Court. That pursuant to said Parenting Agreement the parties shall be awarded
23 /

1 Joint Legal custody of the minor child, to wit, ISABELLA SARA LEWIS, born August 10,
2 2006.

3 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that pursuant to the
4 attached Parenting Agreement the parties shall be awarded Joint Physical custody of the minor
5 child, to wit, ISABELLA SARA LEWIS, born August 10, 2006.
6

7 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that parties shall follow
8 the Holiday Visitation schedule with the minor child as outlined in the attached Parenting
9 Agreement.

10 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Defendant shall
11 pay to Plaintiff THREE HUNDRED SEVEN DOLLARS (\$307.00) per month as and for child
12 support. This amount has been adjusted to include an offset of \$133.00 per month for the cost of
13 the minor child's health insurance in compliance with NRS 125B.070 and NRS 125B.080. The
14 offset amount is one-half (1/2) of \$266.00, which is the total amount Defendant pays per month
15 for the minor child's insurance coverage. The total amount of child support has been calculated
16 as follows: \$440.00 [Defendant's obligation] - \$133.00 [insurance offset] = \$307.00.
17

18 Defendant's obligation to pay child support is effective June 2011 and shall continue
19 until such time as the minor child reaches 18 years of age, or if still enrolled in high school, upon
20 reaching 18 years of age, until the child reaches the age of 19 or graduates from high school,
21 whichever occurs sooner, becomes self-supporting or becomes otherwise emancipated.
22

23 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Defendant,
24 WESLEY ALLEN LEWIS, shall maintain medical and dental insurance for the minor child if
25 available through his employer. Any deductibles and expenses not covered by insurance shall be
26 /
27
28

1 divided equally between the parties. Either party incurring an out-of-pocket medical expense
2 shall provide a copy of the paid invoice/receipt to the other party within thirty (30) days of
3 incurring such expense. If the invoice/receipt is not tendered within the thirty (30) day period,
4 the Court may consider it as a waiver of reimbursement by the incurring party. The other party
5 will then have thirty (30) days within which to dispute the expense or reimburse the incurring
6 party for one-half of the out-of-pocket expenses. If not disputed or paid within the thirty (30)
7 day period, the party may be subject to a finding of contempt and appropriate sanctions.

8
9 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that upon stipulation of
10 the parties each party shall be awarded his or her own personal property.

11
12 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that upon stipulation of
13 the parties each party shall be responsible for his or her own debt and each should indemnify and
14 hold the other harmless thereon.

15
16 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Father shall
17 claim the minor child for tax purposes in Even numbered years, and the Mother shall claim the
18 minor child for taxes in Odd numbered years.

19
20 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that neither party shall
21 be awarded spousal support.

22
23 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Plaintiff shall have
24 her former or maiden name of MARIA DANIELA PERDOMO restored to her.

25
26 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that each party shall
27 pay their own attorney's fees.
28

1 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that each party shall
2 submit the information required in NRS 125B.055, NRS 125.130 and NRS 125.230 on a separate
3 form to the Court and the Welfare Division of the Department of Human Resources within ten
4 (10) days from the date this Decree is filed. Such information shall be maintained by the clerk in
5 a confidential manner and not part of the public record. The parties shall update the information
6 filed with the Court and the Welfare Division of the Department of Human Resources within ten
7 (10) days should any of that information become inaccurate.

8 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125.510(6):

9
10 **PENALTY FOR VIOLATION OF ORDER:** THE ABDUCTION, CONCEALMENT
11 OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE
12 AS A CATEGORY D FELONY AS PROVIDED IN NRS 193.130. NRS 200.359
13 provides that every person having a limited right of custody to a child or any parent
14 having no right of custody to the child who willfully detains, conceals or removes the
15 child from a parent, guardian or other person having lawful custody or a right of
16 visitation of the child in violation of an order of this court, or removes the child from the
jurisdiction of the court without the consent of either the court or all persons who have
the right to custody or visitation is subject to being punished for a category D felony as
provided in NRS 193.130.

17 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of October 25,
18 1980, adopted by the 14th Session of the Hague Conference on Private International law apply if
19 a parent abducts or wrongfully retains a child in a foreign country. The parties are also put on
20 notice of the following provisions in NRS 125.510(8):

21
22 If a parent of the child lives in a foreign country or has significant commitments in a
23 foreign country:

24 (a) The parties may agree, and the court shall include in the order for custody of the child,
25 that the United States is the country of habitual residence of the child for the purposes of
applying the terms of the Hague Convention as set forth in subsection 7.

26 (b) Upon motion of one of the parties, the court may order the parent to post a bond if the
27 court determines that the parent poses an imminent risk of wrongfully removing or
28 concealing the child outside the country of habitual residence. The bond must be in an
amount determined by the court and may be used only to pay for the cost of locating the

1 child and returning him to his habitual residence if the child is wrongfully removed from
2 or concealed outside the country of habitual residence. The fact that a parent has
3 significant commitments in a foreign country does not create a presumption that the
4 parent poses an imminent risk of wrongfully removing or concealing the child.

NOTICE IS HEREBY GIVEN of the following provisions of NRS 125C.200:

5 If custody has been established and the custodial parent intends to move his residence to
6 a place outside of this state and to take the child with him, he must, as soon as possible
7 and before the planned move, attempt to obtain the written consent of the noncustodial
8 parent to move the child from this state. If the noncustodial parent refuses to give that
9 consent, the custodial parent shall, before he leaves this state with the child, petition the
10 court for permission to move the child. The failure of a parent to comply with the
11 provisions of this section may be considered as a factor if a change of custody is
12 requested by the noncustodial parent.

NOTICE IS HEREBY GIVEN that the parties are subject to the provisions of NRS 31A
13 and NRS 125.450 regarding the collection of delinquent child support payments.

NOTICE IS HEREBY GIVEN that either party may request a review of child support
14 pursuant to NRS 125B.145.

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1 **NOTICE IS HEREBY GIVEN** that all NOTICE PROVISIONS contained in this Order
2 are hereby made orders of the Court and this Court retains jurisdiction to enforce the Orders
3 contained herein and for all purposes relative to the custody and support of the minor children.

4 DATED and done in Clark County, Nevada this 15 day of July, 2011.

5
6
7 **DISTRICT COURT JUDGE**
GAYLE NATHAN

8 Respectfully submitted,

Approved as to form and content,

9 **LEGAL AID CENTER OF**
10 **SOUTHERN NEVADA, INC.**

Law Office of Ernest A. Buche, Jr.

11 By: [Signature]
12 **LIDIA G. RINCON, ESQ.**
Nevada Bar No.: 11763
13 **BARBARA E. BUCKLEY, ESQ.**
Nevada Bar No.: 3918
14 800 South Eighth Street
Las Vegas, Nevada 89101
15 (702) 386-1070, Ext. 188
lrincon@lacsns.org
Attorneys for Plaintiff

By: [Signature]
ERNEST A. BUCHE, JR., ESQ.
Nevada Bar No.: 5235
300 E. Charleston Blvd., Ste. 105
Las Vegas, Nevada 89104
(702) 388-0222
Attorney for Defendant

EXHIBIT A

ORIGINAL

May 26 2011

STEVEN D. GRIERSON
CLERK OF THE COURTDISTRICT COURT
CLARK COUNTY, NEVADALucinda A. Tait
DEPUTY

MARIA D. LEWIS,

Plaintiff

LUCINDA A. TAIT

vs

Case No. D10427054D

Department No. B-1

WESLEY A. LEWIS,

Defendant

PARENTING AGREEMENTDate of Hearing: ~~Not Set~~Time of Hearing: ~~Not Set~~

5/26/11

2:00 pm

The parents have met in mediation and have agreed to a Parenting Agreement. The intent of this Parenting Agreement is to promote healthy relationships between the child, Isabella Lewis, DOB: 8-10-06, and her parents. Each of the parents, Maria Lewis, natural mother, and Wesley Lewis, natural father, agree that co-parenting requires the acceptance of mutual responsibilities and rights as far as the child is concerned.

LEGAL CUSTODY PROVISIONS

Legal custody addresses the issues and matters including, but not limited to, the health, education, religious upbringing, and welfare of the child.

The parents agree to share joint legal custody of the child named above.

The parents agree to provide each other with the names, addresses, telephone numbers of medical, educational, child care, and other providers of professional services for the child. Should this information change, each parent agrees to provide notification in advance, or as soon as possible, to the other parent.

1 Both parents are entitled to have access to medical information (both emergency and
2 routine), school records, and to consult with any and all professionals involved with the child. The
3 parents agree that each parent shall be empowered to obtain emergency health care for the child
4 without the consent of the other parent. The parents agree to notify the other parent as soon as
5 reasonably possible of any illness requiring medical attention or any emergency involving the child.
6

7 OBTAINING INFORMATION

8 The parents agree to provide each other with the address and telephone number at
9 which the child resides.

10 The parents agree to notify each other, and the Clerk of the Court, in writing at least
11 ten (10) days prior to changing residences, phone numbers, or employment.
12

13 The parents agree to provide each other, upon receipt, information concerning the
14 well-being of the child, including, but not limited to, school information, activities involving the
15 child, and all communications from health care providers.

16 The parents agree to advise each other of school, athletic, and social events in which
17 the child participates, and both parents may participate in activities for the child.
18

19 PHYSICAL CUSTODY PROVISIONS

20 Physical custody addresses the residential arrangements and specific periods of
21 parental responsibilities for the child. The parents shall maintain joint physical custody of the child,
22 which entails the following:

23 The parents agree that the child shall reside with the mother each week from
24 Thursday at 9:00 a.m. until Sunday at 7:30 p.m. and with the father each week from Sunday at
25 7:30 p.m. until Thursday at 9:00 a.m. Sunday evening from 7:30 p.m. until Monday at 9:00 a.m.
26 shall be alternated between the parents, such that on alternate weeks the child spends three
27
28

1 overnights in the mother's care and four overnights in the father's care. On the opposite weeks, she
2 spends four overnights in the mother's care and three overnights in the father's care.

3 HOLIDAYS

4 Holidays and special times shall take precedence over all other time-share
5 arrangements.

6 Mother's/Father's Day

7 The parents agree that Mother's/Father's Day shall begin the day before the holiday
8 at 10:00 p.m. and end on the holiday at 7:30 p.m. The mother shall have the child each year on
9 Mother's Day, and the father shall have the child each year on Father's Day.
10

11 Parents' Birthdays

12 The parents agree that Mother's/Father's Birthday shall begin on the birthday at
13 10:00 a.m. and end on the birthday at 7:30 p.m. The parents shall have the child each year on their
14 respective birthdays.
15

16 Child's Birthday

17 The parents agree to follow the routine time-share arrangement on the child's
18 birthday. The other parent shall have the child for three (3) hours on the birthday with arrangements
19 for the specific times to be made between the parents by mutual agreement, seven (7) days in
20 advance.
21

22 New Year's Holiday

23 The parents agree that New Year's holiday shall be defined as beginning
24 December 31 at 5:00 p.m. and concluding January 1 at 5:00 p.m. New Year's holiday shall be
25 alternated on a yearly basis, with the child residing with the father in odd-numbered years and with
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1 the mother in even-numbered years. Odd and even-numbered years shall be determined by
2 December 31.

3
4 Halloween

5 The parents agree that beginning in 2011 and thereafter, Halloween shall be defined
6 as beginning October 31 at 10:00 a.m. and concluding October 31 at 10:00 p.m. Halloween shall be
7 alternated on a yearly basis, with the child residing with the mother in odd-numbered years and with
8 the father in even-numbered years.

9 Veteran's Day

10 The parents agree that Veteran's Day shall be defined as beginning November 10 at
11 10:00 p.m. and concluding November 11 at 7:30 p.m. The child shall reside with the father each
12 year on Veteran's Day.
13

14 Thanksgiving

15 The parents agree that Thanksgiving shall be defined as beginning the day before the
16 holiday at 10:00 p.m. and concluding the Sunday after the holiday at 7:30 p.m. The child shall reside
17 with the mother each year on Thanksgiving.
18

19 Christmas

20 The parents agree that Christmas shall be divided into two periods. The first period
21 shall begin December 24 at noon and end December 25 at noon. The second period shall begin
22 December 25 at noon and end December 26 at noon. These periods shall be alternated yearly
23 between the parents. In odd-numbered years, the child shall reside with the father during the first
24 period and with the mother during the second period. In even-numbered years, the child shall reside
25 with the mother during the first period and with the father during the second period.
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1 agree that routine exchanges of information shall be accomplished through email. Emergencies or
2 information of a time-sensitive (defined as an event taking place within that week) shall be
3 accomplished with one telephone call to the other parent.

4 The parents agree to share itinerary information when traveling out-of-state, to
5 include dates of travel, destination, and an emergency contact number. If traveling outside of the
6 country, each parent must have a notarized letter of consent from the other parent.

7 The parents agree that the father and child shall obtain passports, so that the child can
8 travel internationally with each parent. International travel shall require that the child be with one of
9 the parents during the travel. The parents agree to keep the child's passport in a safe deposit box
10 that will be accessible to each parent.

11 The parents agree they shall be entitled to reasonable telephone communication with
12 the child. They further agree to refrain from interfering with the child's right to privacy during such
13 telephone conversations.

14 The parents agree that shall each provide the child with appropriate housing and
15 sleeping accommodations.

16 The parents agree that should either parent require additional child care for a period
17 of three (3) hours or more while the child is in their care, the other parent shall be given the first
18 opportunity to provide such care for the child.

19 REMOVING THE CHILD FROM THE STATE

20 The parents agree that neither parent shall remove the child from the state of Nevada
21 for the purpose of changing the child's residence without the written consent of both parents or until
22 further Order of the Court. However, this does not preclude the child from participating in out-of-
23 state family activities.

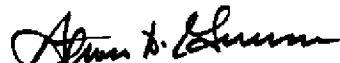
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1 **WOA**
2 **LIDIA G. RINCON, ESQ.**
3 Nevada Bar No.: 11763
4 **BARBARA E. BUCKLEY, ESQ.**
5 Nevada Bar No.: 3918
6 **LEGAL AID CENTER OF SOUTHERN NEVADA, INC.**
7 800 South Eighth Street
8 Las Vegas, Nevada 89101
9 (702) 386-1070, Ext. 188
10 (702) 388-1645 (Fax)
11 lrincon@lacsns.org
12 Attorneys for Plaintiff


CLERK OF THE COURT

8 **DISTRICT COURT**
9 **FAMILY DIVISION**
10 **CLARK COUNTY, NEVADA**

12 MARIA DANIELA LEWIS,
13 Plaintiff,

14 vs.

15 WESLEY ALLEN LEWIS,
16 Defendant.

Case No.: D-10-427054-D
Dept. No.: "T"

18 **NOTICE OF WITHDRAWAL OF ATTORNEY FOR PLAINTIFF**

19 **NOTICE IS HEREBY GIVEN** that counsel for the Plaintiff hereby

20 Withdraws from this action in the manner consistent with and according to Supreme Court Rule
21 46, which states in pertinent part as follows: After Judgment or final determination, an attorney
22 may withdraw as attorney of record at any time
23 upon the attorney's filing a withdrawal, with or
24 without the client's consent.

25 ///

26 ///


27 ///

28 ///

1 **WHEREFORE, MARIA DANIELA LEWISS** may be served with further proceedings,
2 if any, at her last known address of 4555 E. Sahara Avenue, #257, Las Vegas, Nevada 89104.

3 DATED this 26th day of July, 2011.

4 **LEGAL AID CENTER OF SOUTHERN NEVADA, INC.**


6 By: 
7 **LIDIA G. RINCON, ESQ.**
8 Nevada Bar No.: 11763
9 **BARBARA E. BUCKLEY, ESQ.**
10 Nevada Bar No.: 3918
11 800 South Eighth Street
12 Las Vegas, Nevada 89101
13 (702) 386-1070, Ext. 188
14 (702) 388-1645 (Fax)
15 lrincon@lacsno.org
16 Attorneys for Plaintiff

CERTIFICATE OF MAILING

I DO HEREBY CERTIFY that I am an employee of LEGAL AID CENTER OF SOUTHERN NEVADA, INC., and that on the 26th day of July, 2011, I placed a true and correct copy of the foregoing NOTICE OF WITHDRAWAL OF ATTORNEY FOR PLAINTIFF in the United States Mail, in Las Vegas, Nevada, with First Class Postage Pre-Paid thereon, and addressed to the following person or persons at their last known address:

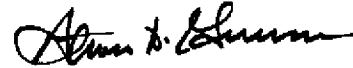
Ernest A. Buche, Jr., Esq.
300 E. Charleston Blvd., Suite #105
Las Vegas, Nevada 89104
Attorney for Defendant

Maria Daniela Lewis
4555 E. Sahara Avenue, #257
Las Vegas, Nevada 89104
Plaintiff


An Employee of LEGAL AID CENTER OF SOUTHERN NEVADA, INC.

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CLERK OF THE COURT

1 **NEO**
2 **LIDIA G. RINCON, ESQ.**
3 Nevada Bar No.: 11763
4 **BARBARA E. BUCKLEY, ESQ.**
5 Nevada Bar No.: 3918
6 **LEGAL AID CENTER OF SOUTHERN NEVADA, INC.**
7 800 South Eighth Street
8 Las Vegas, Nevada 89101
9 (702) 386-1070, Ext. 188
10 (702) 388-1645 (Fax)
11 lrincon@lacs.org
12 Attorneys for Plaintiff

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

10 MARIA DANIELA LEWIS,

11 Plaintiff,

12 vs.

13 WESLEY ALLEN LEWIS,

14 Defendant.

Case No.: D-10-427054-D
Dept. No.: "T"

**NOTICE OF ENTRY OF
DECREE OF DIVORCE**


16 TO: WESLEY ALLEN LEWIS, Defendant Herein In Proper Person.

17 TO: ERNEST A. BUCHE, JR., ESQ., Attorney for Defendant.

18 **YOU WILL PLEASE TAKE NOTICE** that on the 15th day of July, 2011, a DECREE OF
19 DIVORCE, was entered pertaining to the above-entitled action, a copy of which is attached hereto.

20 DATED this 26th day of July, 2011.

22 **LEGAL AID CENTER OF SOUTHERN NEVADA, INC.**

23 By: 
24 **LIDIA G. RINCON, ESQ.**
25 Nevada Bar No.: 11763
26 800 South Eighth Street
27 Las Vegas, Nevada 89101
28 (702) 386-1070, Ext. 188
(702) 388-1645 (Fax)
lrincon@lacs.org
Attorneys for Plaintiff

CERTIFICATE OF MAILING

I DO HEREBY CERTIFY that I am an employee of LEGAL AID CENTER OF SOUTHERN NEVADA, INC., and that on the 26th day of July, 2011, I placed a true and correct copy of the foregoing NOTICE OF ENTRY OF DECREE OF DIVORCE, in the United States Mail, in a Sealed Envelope, in Las Vegas, Nevada, with First Class Postage Pre-Paid thereon, and addressed to the following person or persons at their last known address:

Ernest A. Buche, Jr., Esq.,
300 E. Charleston Blvd., Suite #105
Las Vegas, Nevada 89104
Attorney for Defendant

Maria D. Lewis
4555 E. Sahara Avenue, #257
Las Vegas, Nevada 89104
Plaintiff


An Employee of LEGAL AID CENTER OF SOUTHERN NEVADA, INC.

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DECD

LIDIA G. RINCON, ESQ.

Nevada Bar No.: 11763

BARBARA E. BUCKLEY, ESQ.

Nevada Bar No.: 3918

LEGAL AID CENTER OF SOUTHERN NEVADA, INC.

800 South Eighth Street

Las Vegas, Nevada 89101

(702) 386-1070, Ext. 188

(702) 388-1645 FAX

lrincon@lacsnc.org

Attorneys for Plaintiff

Alvin L. Schuman

CLERK OF THE COURT

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS,

Plaintiff,

v.

WESLEY ALLEN LEWIS,

Defendant.

Case No: D-10-427054-D

Dept. No.: T

DATE OF HEARING: May 26, 2011

TIME OF HEARING: 2:00 p.m.

DECREE OF DIVORCE

THIS CAUSE coming on a Case Management Conference before the above-entitled court, Plaintiff MARIA DANIELA LEWIS (hereinafter "Plaintiff" or "Mother") appearing personally with her attorney of record Lidia G. Rincon, Esq. of LEGAL AID CENTER OF SOUTHERN NEVADA, INC., and Defendant WESLEY ALLEN LEWIS (hereinafter "Defendant" or "Father") appearing personally with his attorney of record Ernest A. Buche, Jr., Esq.. The Court, after reviewing the pleadings and papers on file and hearing argument from the parties hereby FINDS and enters this DECREE OF DIVORCE as follows:

DISPOSITIONS

☐ Conversion from

☐ Blackstone

☐ Inventory

☐ Dissolved

☐ Transferred

☐ Voluntary

☐ Dissolved

☐ Decree of

☒ Trial/Hearing

☐ Decision of

☐ Trial/Exclusion

☐ Hearing

☐ Settlement

☐ Death

☐ Age of Majority

☐ Restoration of

☐ Competency

☐ Order

☐ Terminating

☐ Guardianship

☐ Proceeding

JUL 01 2011

FAMILY COURT
DEPARTMENT T

1 That the Court has complete jurisdiction in the premises, both as to the subject matter
2 thereof as well as the parties hereto; that Plaintiff is now and has been an actual bona fide
3 resident of Clark County, Nevada and has been actually domiciled therein for more than six (6)
4 weeks immediately preceding the commencement of this action; that the parties were married on
5 the 23rd day of June, 2006 in Las Vegas, Nevada.

6 That there is one (1) minor child who is the issue of this marriage, or was adopted by the
7 parties and Plaintiff is not currently pregnant. The name and date of birth of the child is:
8 ISABELLA SARA LEWIS, born August 10, 2006. Since 2006, the child's habitual state of
9 residence has been Nevada.
10

11 That the parties have reached and executed a complete Parenting Agreement through
12 Family Mediation Center ("FMC") and said Parenting Agreement has been filed, affirmed and
13 adopted by this Court. That pursuant to the Parenting Agreement the parties have agreed to joint
14 legal custody and joint physical custody of the minor child, ISABELLA SARA LEWIS, born
15 August 10, 2006.
16

17 That the Court binds Defendant to the Financial Disclosure Form he signed on May 24,
18 2011. That after a review of the parties' Financial Disclosure Forms ("FDF") and because the
19 parties share joint physical custody, the Court finds that the Father's obligation to Mother for
20 child support should be \$440.00 per month, effective June, 2011.
21

22 That Defendant should maintain medical and dental insurance for the minor child which
23 he is currently paying. Defendant should be awarded an offset in the amount of one-half (1/2) of
24 the cost of the insurance for the minor child upon proof of the cost to Counsel. The adjusted
25 amount for child support should be entered into the Order.
26
27 /
28

1 That upon a review of the mother's FDF the Court finds that the mother has two (2) part-
2 time jobs.

3 That upon stipulation of the parties each party should take his and her own personal
4 property.

5 That upon stipulation of the parties each party should be responsible for his and her own
6 debt and each should indemnify and hold the other harmless thereon.

7 That upon stipulation of the parties the Father should claim the minor child for tax
8 purposes in even years and the Mother should claim the minor child in odd years.

9 That neither party should be awarded spousal support.

10 That Plaintiff MARIA DANIELA LEWIS should have her former or maiden name of
11 MARIA DANIELA PERDOMO restored to her.

12 That each party should pay their own attorney's fees.

13 That Plaintiff should be granted a Decree of Divorce upon the grounds set forth in the
14 Complaint.

15 Therefore, **IT IS ORDERED, ADJUDGED AND DECREED** that the bonds of
16 matrimony now and heretofore existing between the parties are hereby wholly dissolved, set
17 aside and forever held for naught, and an absolute Decree of Divorce is hereby granted upon the
18 grounds set forth in the Complaint for Divorce to the parties, and each of the parties is hereby
19 restored to the status of a single, unmarried person.

20 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Parenting
21 Agreement executed by the parties and attached hereto as Exhibit A shall be Affirmed and
22 Adopted by the Court. That pursuant to said Parenting Agreement the parties shall be awarded
23 /

1 Joint Legal custody of the minor child, to wit, ISABELLA SARA LEWIS, born August 10,
2 2006.

3 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that pursuant to the
4 attached Parenting Agreement the parties shall be awarded Joint Physical custody of the minor
5 child, to wit, ISABELLA SARA LEWIS, born August 10, 2006.
6

7 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that parties shall follow
8 the Holiday Visitation schedule with the minor child as outlined in the attached Parenting
9 Agreement.
10

11 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Defendant shall
12 pay to Plaintiff THREE HUNDRED SEVEN DOLLARS (\$307.00) per month as and for child
13 support. This amount has been adjusted to include an offset of \$133.00 per month for the cost of
14 the minor child's health insurance in compliance with NRS 125B.070 and NRS 125B.080. The
15 offset amount is one-half (1/2) of \$266.00, which is the total amount Defendant pays per month
16 for the minor child's insurance coverage. The total amount of child support has been calculated
17 as follows: \$440.00 [Defendant's obligation] - \$133.00 [insurance offset] = \$307.00.
18

19 Defendant's obligation to pay child support is effective June 2011 and shall continue
20 until such time as the minor child reaches 18 years of age, or if still enrolled in high school, upon
21 reaching 18 years of age, until the child reaches the age of 19 or graduates from high school,
22 whichever occurs sooner, becomes self-supporting or becomes otherwise emancipated.
23

24 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Defendant,
25 WESLEY ALLEN LEWIS, shall maintain medical and dental insurance for the minor child if
26 available through his employer. Any deductibles and expenses not covered by insurance shall be
27 /
28

1 divided equally between the parties. Either party incurring an out-of-pocket medical expense
2 shall provide a copy of the paid invoice/receipt to the other party within thirty (30) days of
3 incurring such expense. If the invoice/receipt is not tendered within the thirty (30) day period,
4 the Court may consider it as a waiver of reimbursement by the incurring party. The other party
5 will then have thirty (30) days within which to dispute the expense or reimburse the incurring
6 party for one-half of the out-of-pocket expenses. If not disputed or paid within the thirty (30)
7 day period, the party may be subject to a finding of contempt and appropriate sanctions.
8

9 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that upon stipulation of
10 the parties each party shall be awarded his or her own personal property.
11

12 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that upon stipulation of
13 the parties each party shall be responsible for his or her own debt and each should indemnify and
14 hold the other harmless thereon.

15 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Father shall
16 claim the minor child for tax purposes in Even numbered years, and the Mother shall claim the
17 minor child for taxes in Odd numbered years.
18

19 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that neither party shall
20 be awarded spousal support.

21 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Plaintiff shall have
22 her former or maiden name of MARIA DANIELA PERDOMO restored to her.
23

24 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that each party shall
25 pay their own attorney's fees.
26 /
27 / /
28

1 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that each party shall
2 submit the information required in NRS 125B.055, NRS 125.130 and NRS 125.230 on a separate
3 form to the Court and the Welfare Division of the Department of Human Resources within ten
4 (10) days from the date this Decree is filed. Such information shall be maintained by the clerk in
5 a confidential manner and not part of the public record. The parties shall update the information
6 filed with the Court and the Welfare Division of the Department of Human Resources within ten
7 (10) days should any of that information become inaccurate.

9 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125.510(6):

10 **PENALTY FOR VIOLATION OF ORDER:** THE ABDUCTION, CONCEALMENT
11 OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE
12 AS A CATEGORY D FELONY AS PROVIDED IN NRS 193.130. NRS 200.359
13 provides that every person having a limited right of custody to a child or any parent
14 having no right of custody to the child who willfully detains, conceals or removes the
15 child from a parent, guardian or other person having lawful custody or a right of
16 visitation of the child in violation of an order of this court, or removes the child from the
jurisdiction of the court without the consent of either the court or all persons who have
the right to custody or visitation is subject to being punished for a category D felony as
provided in NRS 193.130.

17 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of October 25,
18 1980, adopted by the 14th Session of the Hague Conference on Private International law apply if
19 a parent abducts or wrongfully retains a child in a foreign country. The parties are also put on
20 notice of the following provisions in NRS 125.510(8):

22 If a parent of the child lives in a foreign country or has significant commitments in a
23 foreign country:

24 (a) The parties may agree, and the court shall include in the order for custody of the child,
25 that the United States is the country of habitual residence of the child for the purposes of
applying the terms of the Hague Convention as set forth in subsection 7.

26 (b) Upon motion of one of the parties, the court may order the parent to post a bond if the
27 court determines that the parent poses an imminent risk of wrongfully removing or
28 concealing the child outside the country of habitual residence. The bond must be in an
amount determined by the court and may be used only to pay for the cost of locating the

1 child and returning him to his habitual residence if the child is wrongfully removed from
2 or concealed outside the country of habitual residence. The fact that a parent has
3 significant commitments in a foreign country does not create a presumption that the
parent poses an imminent risk of wrongfully removing or concealing the child.
NOTICE IS HEREBY GIVEN of the following provisions of NRS 125C.200:

4 If custody has been established and the custodial parent intends to move his residence to
5 a place outside of this state and to take the child with him, he must, as soon as possible
6 and before the planned move, attempt to obtain the written consent of the noncustodial
7 parent to move the child from this state. If the noncustodial parent refuses to give that
8 consent, the custodial parent shall, before he leaves this state with the child, petition the
9 court for permission to move the child. The failure of a parent to comply with the
provisions of this section may be considered as a factor if a change of custody is
requested by the noncustodial parent.

10 **NOTICE IS HEREBY GIVEN** that the parties are subject to the provisions of NRS 31A
11 and NRS 125.450 regarding the collection of delinquent child support payments.

12 **NOTICE IS HEREBY GIVEN** that either party may request a review of child support
13 pursuant to NRS 125B.145.

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1 **NOTICE IS HEREBY GIVEN** that all NOTICE PROVISIONS contained in this Order
2 are hereby made orders of the Court and this Court retains jurisdiction to enforce the Orders
3 contained herein and for all purposes relative to the custody and support of the minor children.

4 DATED and done in Clark County, Nevada this 15 day of July, 2011.
5

6
7 **DISTRICT COURT JUDGE**
8 **GAYLE NATHAN** *CH*

8 Respectfully submitted,

Approved as to form and content,

9 **LEGAL AID CENTER OF**
10 **SOUTHERN NEVADA, INC.**

Law Office of Ernest A. Buche, Jr.

11 By: *[Signature]*
12 **LIDIA G. RINCON, ESQ.**
13 Nevada Bar No.: 11763
14 **BARBARA E. BUCKLEY, ESQ.**
15 Nevada Bar No.: 3918
16 800 South Eighth Street
17 Las Vegas, Nevada 89101
18 (702) 386-1070, Ext. 188
19 lrincon@lacsni.org
20 Attorneys for Plaintiff

By: *Ernest A. Buche Jr*
ERNEST A. BUCHE, JR., ESQ.
Nevada Bar No.: 5235
300 E. Charleston Blvd., Ste. 105
Las Vegas, Nevada 89104
(702) 388-0222
Attorney for Defendant

EXHIBIT A

ORIGINAL

May 26 2011

STEVEN D. GRIERSON
CLERK OF THE COURTDISTRICT COURT
CLARK COUNTY, NEVADALucinda A. Tait
DEPUTY

MARIA D. LEWIS,

LUCINDA A. TAIT

Plaintiff

vs

Case No. D10427054D

Department No. B-1

WESLEY A. LEWIS,

Defendant

PARENTING AGREEMENTDate of Hearing: ~~Not Set~~Time of Hearing: ~~Not Set~~

5/26/11

2:00pm

The parents have met in mediation and have agreed to a Parenting Agreement. The intent of this Parenting Agreement is to promote healthy relationships between the child, Isabella Lewis, DOB: 8-10-06, and her parents. Each of the parents, Maria Lewis, natural mother, and Wesley Lewis, natural father, agree that co-parenting requires the acceptance of mutual responsibilities and rights as far as the child is concerned.

LEGAL CUSTODY PROVISIONS

Legal custody addresses the issues and matters including, but not limited to, the health, education, religious upbringing, and welfare of the child.

The parents agree to share joint legal custody of the child named above.

The parents agree to provide each other with the names, addresses, telephone numbers of medical, educational, child care, and other providers of professional services for the child. Should this information change, each parent agrees to provide notification in advance, or as soon as possible, to the other parent.

1 Both parents are entitled to have access to medical information (both emergency and
2 routine), school records, and to consult with any and all professionals involved with the child. The
3 parents agree that each parent shall be empowered to obtain emergency health care for the child
4 without the consent of the other parent. The parents agree to notify the other parent as soon as
5 reasonably possible of any illness requiring medical attention or any emergency involving the child.
6

7 OBTAINING INFORMATION

8 The parents agree to provide each other with the address and telephone number at
9 which the child resides.

10 The parents agree to notify each other, and the Clerk of the Court, in writing at least
11 ten (10) days prior to changing residences, phone numbers, or employment.
12

13 The parents agree to provide each other, upon receipt, information concerning the
14 well-being of the child, including, but not limited to, school information, activities involving the
15 child, and all communications from health care providers.

16 The parents agree to advise each other of school, athletic, and social events in which
17 the child participates, and both parents may participate in activities for the child.
18

19 PHYSICAL CUSTODY PROVISIONS

20 Physical custody addresses the residential arrangements and specific periods of
21 parental responsibilities for the child. The parents shall maintain joint physical custody of the child,
22 which entails the following:

23 The parents agree that the child shall reside with the mother each week from
24 Thursday at 9:00 a.m. until Sunday at 7:30 p.m. and with the father each week from Sunday at
25 7:30 p.m. until Thursday at 9:00 a.m. Sunday evening from 7:30 p.m. until Monday at 9:00 a.m.
26 shall be alternated between the parents, such that on alternate weeks the child spends three
27
28

1 overnights in the mother's care and four overnights in the father's care. On the opposite weeks, she
2 spends four overnights in the mother's care and three overnights in the father's care.

3 HOLIDAYS

4 Holidays and special times shall take precedence over all other time-share
5 arrangements.
6

7 Mother's/Father's Day

8 The parents agree that Mother's/Father's Day shall begin the day before the holiday
9 at 10:00 p.m. and end on the holiday at 7:30 p.m. The mother shall have the child each year on
10 Mother's Day, and the father shall have the child each year on Father's Day.

11 Parents' Birthdays

12 The parents agree that Mother's/Father's Birthday shall begin on the birthday at
13 10:00 a.m. and end on the birthday at 7:30 p.m. The parents shall have the child each year on their
14 respective birthdays.
15

16 Child's Birthday

17 The parents agree to follow the routine time-share arrangement on the child's
18 birthday. The other parent shall have the child for three (3) hours on the birthday with arrangements
19 for the specific times to be made between the parents by mutual agreement, seven (7) days in
20 advance.
21

22 New Year's Holiday

23 The parents agree that New Year's holiday shall be defined as beginning
24 December 31 at 5:00 p.m. and concluding January 1 at 5:00 p.m. New Year's holiday shall be
25 alternated on a yearly basis, with the child residing with the father in odd-numbered years and with
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1 the mother in even-numbered years. Odd and even-numbered years shall be determined by
2 December 31.

3 Halloween

4 The parents agree that beginning in 2011 and thereafter, Halloween shall be defined
5 as beginning October 31 at 10:00 a.m. and concluding October 31 at 10:00 p.m. Halloween shall be
6 alternated on a yearly basis, with the child residing with the mother in odd-numbered years and with
7 the father in even-numbered years.
8

9 Veteran's Day

10 The parents agree that Veteran's Day shall be defined as beginning November 10 at
11 10:00 p.m. and concluding November 11 at 7:30 p.m. The child shall reside with the father each
12 year on Veteran's Day.
13

14 Thanksgiving

15 The parents agree that Thanksgiving shall be defined as beginning the day before the
16 holiday at 10:00 p.m. and concluding the Sunday after the holiday at 7:30 p.m. The child shall reside
17 with the mother each year on Thanksgiving.
18

19 Christmas

20 The parents agree that Christmas shall be divided into two periods. The first period
21 shall begin December 24 at noon and end December 25 at noon. The second period shall begin
22 December 25 at noon and end December 26 at noon. These periods shall be alternated yearly
23 between the parents. In odd-numbered years, the child shall reside with the father during the first
24 period and with the mother during the second period. In even-numbered years, the child shall reside
25 with the mother during the first period and with the father during the second period.
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VACATION

The parents agree that vacation shall take precedence over the regular time-share arrangements but not over the holiday time-share arrangements.

The parents agree that provided it causes no disruption to the child's schooling, they shall each be allowed to have the child during their respective vacations with thirty (30) days advance notice to the other parent.

ADDITIONAL TIME

The parents agree that any additional time with the child or changes in the parenting schedule shall be arranged by mutual agreement.

NOTICE

The parents agree that in the event any scheduled time cannot be kept due to illness or an emergency involving the child and/or the parent, the parent unable to comply with the schedule will notify the other parent and child as soon as possible.

The parents agree that the child shall be picked up and returned at the designated times. Should a delay become necessary, the receiving parent shall be notified immediately.

TRANSPORTATION

The parents agree that responsibility for providing transportation shall be assumed by the receiving parent.

SPECIAL PROVISIONS

The parents agree to use self-control and not verbally or physically abuse each other in front of the child.

The parents agree to communicate directly regarding the needs and well-being of their child and agree not to use the child as a communicator regarding parental issues. The parents

1 agree that routine exchanges of information shall be accomplished through email. Emergencies or
2 information of a time-sensitive (defined as an event taking place within that week) shall be
3 accomplished with one telephone call to the other parent.

4 The parents agree to share itinerary information when traveling out-of-state, to
5 include dates of travel, destination, and an emergency contact number. If traveling outside of the
6 country, each parent must have a notarized letter of consent from the other parent.

7 The parents agree that the father and child shall obtain passports, so that the child can
8 travel internationally with each parent. International travel shall require that the child be with one of
9 the parents during the travel. The parents agree to keep the child's passport in a safe deposit box
10 that will be accessible to each parent.

11 The parents agree they shall be entitled to reasonable telephone communication with
12 the child. They further agree to refrain from interfering with the child's right to privacy during such
13 telephone conversations.

14 The parents agree that shall each provide the child with appropriate housing and
15 sleeping accommodations.

16 The parents agree that should either parent require additional child care for a period
17 of three (3) hours or more while the child is in their care, the other parent shall be given the first
18 opportunity to provide such care for the child.

19 REMOVING THE CHILD FROM THE STATE

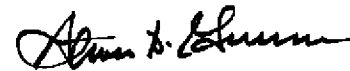
20 The parents agree that neither parent shall remove the child from the state of Nevada
21 for the purpose of changing the child's residence without the written consent of both parents or until
22 further Order of the Court. However, this does not preclude the child from participating in out-of-
23 state family activities.

[illegible]

● ● ● ● ● ● ● ●

NOW

ERNEST A. BUCHE, JR., ESQ.
Nevada State Bar No. 5235
LAW OFFICES OF ERNEST A. BUCHE, JR.
A PROFESSIONAL CORPORATION
300 E. Charleston Blvd., Ste. 105
Las Vegas, Nevada 89104
(702) 388-0222
Attorney for Defendant



CLERK OF THE COURT

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

MARIA D. LEWIS,

Plaintiff,

vs.

WESLEY A. LEWIS,

Defendant.

Case No: D-10-427054-D

Dept. No: T

NOTICE OF WITHDRAWAL AS ATTORNEY OF RECORD

TO: WESLEY A. LEWIS, Defendant; and
TO: MARIA D. LEWIS, Plaintiff in Proper Person.

PLEASE TAKE NOTICE that ERNEST A. BUCHE, JR., ESQ., of the Law Offices of ERNEST A. BUCHE, JR., A PROFESSIONAL CORPORATION, attorney for the Defendant, WESLEY A. LEWIS hereby withdraws from further representation of the Defendant, WESLEY A. LEWIS pursuant to Supreme Court Rule 46, as there are no pending matters in the above-entitled action.

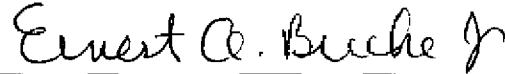
S.C.R. provides in relevant part as follows:

"After judgment or final determination, an attorney may withdraw as attorney of record at any time upon the attorney's filing a withdrawal, with or without the client's consent."

1 Therefore, pursuant to S.C.R. 46, ERNEST A. BUCHE, JR., ESQ., of the Law
2 Offices of ERNEST A. BUCHE, JR., A PROFESSIONAL CORPORATION, hereby
3 withdraws as attorney of record for the Defendant, WESLEY A. LEWIS.

4
5 **DATED** this 6th day of October, 2011.

6 LAW OFFICES OF ERNEST A. BUCHE, JR.
7 A PROFESSIONAL CORPORATION

8 

9 ERNEST A. BUCHE, JR., ESQ.
10 Nevada State Bar No. 5235
11 300 E. Charleston Blvd., Ste. 105
12 Las Vegas, Nevada 89104
13 (702) 388-0222
14 Attorney for Defendant

15 **CERTIFICATE OF MAILING**

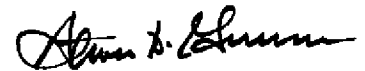
16 I hereby certify that on the 6th day of October, 2011, I did deposit in the United
17 States Mail, First Class, postage prepaid thereon, one (1) true and correct copy of the
18 foregoing **NOTICE OF WITHDRAWAL AS ATTORNEY OF RECORD** to the
19 following:

20 Wesley A. Lewis
21 3150 S. Nellis Blvd. #1081
22 Las Vegas, NV 89121
23 Defendant

24 Maria D. Lewis
25 4555 E. Sahara Ave., #257
26 Las Vegas, Nevada 89104
27 Plaintiff in proper person

28 

An employee of ERNEST A. BUCHE JR.,
A Professional Corporation



CLERK OF THE COURT

MOT
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
)	CASE NO. D-10-427054-D
Plaintiff,)	DEPT. NO. T
)	
vs.)	DATE OF HEARING: 06/04/2013
)	TIME OF HEARING: 9:30AM
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

Plaintiff's Motion To Have Defendant Held In Contempt Of
Court, To Enforce Decree Of Divorce, To Reduce Child Support
Arrears To Judgment, And For Award Of Attorney Fees

NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION/COUNTERMOTION WITH THE CLERK OF THE COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION/COUNTERMOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION/COUNTERMOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING DATE.

COMES NOW Plaintiff, MARIA DANIELA PERDOMO (formerly known as MARIA DANIELA LEWIS), by and through her attorney, FRANCES-ANN FINE, ESQ., of The Fine Law Group, and moves this Court for the following relief:

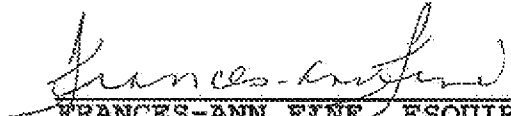
(1) That Defendant be held in contempt of court and punished accordingly for his repeated willful violations of the parties' Decree Of Divorce;

1 (2) That the provisions of the parties' Decree Of
2 Divorce be enforced;

3 (3) That Defendant's child support arrears be reduced to
4 judgment; and

5 (4) That Plaintiff be awarded attorneys fees.

6 DATED this 1st day of May, 2013.

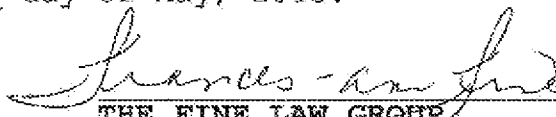
7
8 
9 FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 25
The Fine Law Group
10 Attorneys for Plaintiff
11 MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

12 NOTICE OF MOTION

13 TO: WESLEY ALLEN LEWIS, Defendant in Proper Person;

14 YOU WILL PLEASE TAKE NOTICE that the undersigned will
15 bring Plaintiff's Motion To Have Defendant Held In Contempt Of
16 Court, To Enforce Decree Of Divorce, To Reduce Child Support
17 Arrears To Judgment, And For Award Of Attorney Fees on for hearing
18 before the above-entitled Court on: 06/04/2013 9:30AM
19

20 DATED this 7th day of May, 2013.

21
22 
23 THE FINE LAW GROUP
FRANCES-ANN FINE, ESQ.
Nevada Bar No. 0025
24 Attorney for Plaintiff
MARIA DANIELA LEWIS nka
25 MARIA DANIELA PERDOMO

26 POINTS AND AUTHORITIES

27 I. FACTS

28 Plaintiff (hereafter "MARIA") and Defendant (hereafter

1 "WESLEY") were last before this Court on May 26, 2011 for a Case
2 Management Conference. At that time the parties reached an
3 agreement as to the terms of their divorce, with one exception.
4 The Court had imposed a child support obligation upon WESLEY based
5 upon his Financial Disclosure Form that had been executed on May
6 24, 2011 and filed on May 25, 2011. WESLEY's counsel then advised
7 the Court that just before the hearing WESLEY had told him that he
8 now had a new job making \$1,200.00 less per month. This Court
9 refused to accept this alleged new job, instead binding WESLEY to
10 the Financial Disclosure Form signed two days before.

11 The parties' Decree Of Divorce filed on July 15, 2011
12 adopted the parties' Parenting Agreement that was filed in open
13 court on May 26, 2011, attaching same as Exhibit "A". The parties
14 were awarded joint legal custody and joint physical custody of
15 their daughter, ISABELLA SARA LEWIS (hereafter "ISABELLA"), born
16 August 10, 2006.

17 CHILD SUPPORT ARREARS and FAILURE TO PROVIDE MEDICAL
18 INSURANCE: The Decree established the parties' obligations,
19 including as follows:

20 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that
21 Defendant shall pay to Plaintiff THREE HUNDRED SEVEN
22 DOLLARS (\$307.00) per month as and for child support.
23 This amount has been adjusted to include an offset of
24 \$133.00 per month for the cost of the minor child's
25 health insurance in compliance with NRS 125B.070 and NRS
26 125B.080. The offset amount is one-half (½) of \$266.00
27 which is the total amount Defendant pays per month for
28 the minor child's insurance coverage. The total amount
of child support has been calculated as follows: \$440.00
[Defendant's obligation] - \$133.00 [insurance offset] -
\$307.00.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that
Defendant . . . shall maintain medical and dental
insurance for the minor child if available through his
employer. Any deductibles and expense not covered by

1 insurance shall be divided equally between the parties."

2 To date, WESLEY has failed to provide the mandated
3 medical and dental insurance to cover ISABELLA. He also has failed
4 to pay the ordered child support to MARIA for ISABELLA's benefit.
5 WESLEY recently went before the Child Support Court (as opposed to
6 this Court) to seek a modification of his child support obligation.
7 As this Court is aware, in such a court child support recipients
8 such as MARIA are nominally represented by the Clark County
9 District Attorney's Office.

10 At the February 5, 2013 hearing in Case No. R-11-161532-
11 R, WESLEY, through his counsel, was somehow able to convince the
12 District Attorney that he had, between June 2011 through September
13 20, 2012, paid child support in the total amount of \$2,391.00. The
14 Court concluded, with no evidence provided whatsoever, that
15 WESLEY's child support arrears for that period was in the amount of
16 \$3,020.17. The evidence will show that figure is wholly
17 inaccurate.

18 The Hearing Master adopted those proposed findings. It
19 further recommended that WESLEY pay no current child support (based
20 upon his assertion that his current gross monthly income is only
21 \$1,353.58, which is less than MARIA's). Finally, it recommended
22 that he pay a mere \$30.00 per month towards his child support
23 arrears. All of this was done without the level of evidence that
24 would be required by this Court.

25 **FAILURE TO OBTAIN PASSPORT:** As noted above, the Decree
26 specifically adopted the provisions of the parties' Parenting
27 Agreement. Page 6 of that Parenting Agreement states in pertinent
28 part as follows:

1 The parents agree that the father and child shall
2 obtain passports, so that the child can travel
3 internationally with each parent. International travel
4 shall require that the child be with one of the parents
5 during the travel. The parents agree to keep the child's
6 passport in a safe deposit box that will be accessible to
7 each parent.

8 Despite numerous requests by MARIA that WESLEY cooperate
9 in obtaining a passport for ISABELLA, he has steadfastly refused to
10 do so. This prevents ISABELLA from visiting her mother's side of
11 the family in South America. MARIA's family is in Venezuela.

12 Also included within the Parenting Agreement at Page 6 is
13 a further requirement that each parent::

14 "[S]hall be entitled to reasonable telephone
15 communication with the child. They further agree to
16 refrain from interfering with the child's right to
17 privacy during such telephone conversations.

18 Plaintiff has, on numerous occasions, attempted contact
19 with ISABELLA during Defendant's time share as authorized by the
20 Decree. He rarely responds, and if he does, instead of honoring
21 the "privacy" requirement, forces the child to speak to her mother
22 (MARIA) on a speaker phone. Although difficult to prove the
23 Plaintiff seeks an admonition from this Court of compliance with
24 this requirement. If he fails to comply with this requirement,
25 Plaintiff will supply phone records to this Court of said non-
26 compliance and request permission to tape record the conversations.

27 There remain two additional violations of the
28 Decree of Divorce which require the Court's attention.

 (1) WESLEY is to provide ISABELLA with appropriate
housing and sleeping accommodations, Page 6, Lines 16 - 18. The
home the Defendant shares with his parents has three bedrooms, two
of which are, as they were when the Plaintiff resided there, filled

1 to capacity with "junk." ISABELLA shares with MARIA that she
2 either sleeps on a mattress on the floor in one of the bedrooms,
3 with her father or, she is sleeping in bed with her grandparents.
4 Neither is a healthy option, or in her best interests.

5 (2) The Parenting Agreement goes on to state:

6 "The parents agree that should either parent require
7 additional child care for a period of three (3) hours or
8 more while the child is in their care, the other parent
shall be given the first opportunity to provide such care
of the child."

9 Because this is a post-judgment request, discovery has
10 not yet been re-opened. If discovery is permitted, the Plaintiff
11 could prove that the Defendant's work schedule is such that the
12 minor child is left with third parties regularly, with no
13 compliance with the Right of First Refusal. ISABELLA returns from
14 her visits with her father and is often quiet and distant due to
15 her being told to keep secrets from her mother. This, too, is
16 unhealthy and not in the best interests of this child.

17 The Plaintiff seeks an admonition from this court that
18 this behavior must cease, and that if it does not, then the Court
19 should take whatever action is necessary to provide for ISABELLA's
20 best interests.

21 II. CONTEMPT

22 NRS 1.210(3) states that "[t]he Court has the power to
23 compel obedience to its orders," and NRS 22.010(3) provides that
24 "[t]he refusal to abide by a lawful order issued by the Court is
25 contempt." NRS 22.100 provides:

26 Upon the answer and the evidence taken, the Court or
27 Judge or jury, as the case may be, shall determine
28 whether the person proceeded against is guilty of the
contempt charged, and if it be found that he is guilty of
the contempt, a fine may be imposed upon him not

1 exceeding \$500, or he may be imprisoned not exceeding 25
2 days, or both, but no imprisonment shall exceed 25 days
except as provided in NRS 22.110.

3 As is apparent from the above statement of facts, WESLEY
4 is guilty of numerous violations of the parties' Decree, each of
5 which is separately subject to a contempt finding and punishment.
6 These include each month WESLEY failed to pay ordered child
7 support, each month he failed to maintain insurance to cover
8 ISABELLA, and his refusal to cooperate in obtaining a passport for
9 ISABELLA. The Court is respectfully urged to find WESLEY guilty of
10 these contempts and punish him accordingly.

11 III. ENFORCEMENT OF DECREE

12 This Court is requested to not only find WESLEY in
13 contempt but also to order his compliance with the Decree
14 provisions. It is clear that WESLEY has no intention of
15 maintaining insurance for ISABELLA, and for that reason the offset
16 against his child support obligation representing the alleged cost
17 of same should be removed. WESLEY on May 26, 2011 attempted to
18 fool this Court into reducing his child support obligation. When
19 that did not work, he simply ignored the Court's order. Most
20 recently, he gambled at attempting again to fool a court (this time
21 the Child Support Court through an overworked DA's Office), and
22 apparently was successful. This Court should order that WESLEY's
23 \$440.00 per month child support obligation be in effect from June
24 2011 forward.

25 IV. CHILD SUPPORT ARREARS

26 MARIA is separately submitting her Schedule Of Arrears,
27 calculating WESLEY's child support arrears from June 2011 through
28 the date of the hearing of the instant motion. In doing so, the

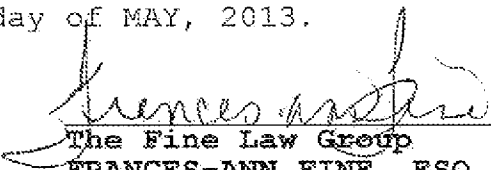
1 monthly child support obligation utilized will be \$440.00 per month
2 amount imposed by this Court. Since WESLEY has failed to maintain
3 medical and dental insurance for ISABELLA, the offset of \$133.00
4 per month for the alleged cost of same will not be afforded him.
5 The Court is respectfully requested to award MARIA a judgment
6 against WESLEY for said arrears.

7 **V. ATTORNEY'S FEES**

8 NRS 22.100 (3) provides that, in addition to the
9 penalties provided in NRS 22.100 (2) a party found in contempt of
10 court may be ordered to pay to the party seeking to enforce an
11 order that party's attorneys fees. EDCR 7.60 provides that a court
12 may impose as sanctions attorney fees and costs when a party "fails
13 or refuses to comply with an order of a judge of the court."
14 Additionally, NRS 125.180 specifically authorizes the awarding of
15 attorney fees and costs in addition to a judgment for arrears.

16 Based upon the foregoing authority, it is respectfully
17 requested that MARIA be awarded a judgment against WESLEY for her
18 attorney fees and costs incurred in the instant litigation, subject
19 to the filing of a *Brunzell* Affidavit setting forth the amount of
20 said fees as well as the other factors addressed in that case.

21 DATED this 15th day of MAY, 2013.

22 
23 The Fine Law Group
24 FRANCES-ANN FINE, ESQ.
25 Nevada Bar No. 0025
26 Attorney for Plaintiff
27 MARIA DANIELA LEWIS nka
28 MARIA DANIELA PERDOMO

27 / / /

28 / / /

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AFFIDAVIT OF MARIA DANIELA PERDOMO

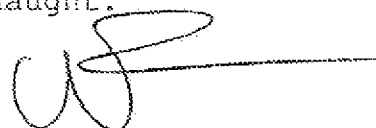
STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

MARIA DANIELA PERDOMO, being first duly sworn, does
depose and state as follows:

1. I am the Plaintiff in the above-captioned matter,
and make this affidavit based upon my own personal knowledge except
as to those matters stated upon information and belief, and as to
those matters I believe them to be true.

2. I have the contents of this motion to which this
affidavit is attached, and attest that the facts stated therein are
true and correct.

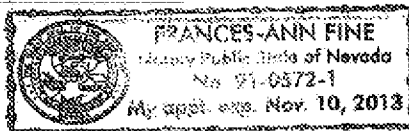
Further Affiant sayeth naught.



MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

SUBSCRIBED AND SWORN to before
me this 1st day of May, 2013


Notary Public



MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Maria Pordano
Plaintiff/Petitioner

-vs-

Wesley Lewis
Defendant/Respondent

CASE NO. D-10-421043-D

DEPT. I

FAMILY COURT MOTION/OPPOSITION
FEE INFORMATION SHEET (NRS 19.0312)

Party Filing Motion/Opposition: ☒ Plaintiff/Petitioner ☐ Defendant/Respondent

MOTION FOR/OPPOSITION TO Have Defendant held in Contempt

Notice

Motions and Oppositions to
Motions filed after entry of
final Decree or Judgment
(pursuant to NRS 125,
125B & 125C)
are subject to the Re-open
Filing Fee of \$25.00, unless
specifically excluded.
(See NRS 19.0312)

Excluded Motions/Oppositions

- ☐ Motions filed before final Divorce/Custody Decree entered
(Divorce/Custody Decree NOT final)
- ☐ Child Support Modification ONLY
- ☐ Motion/Opposition For Reconsideration (Within 10 days of Decree)
Date of Last Order _____
- ☐ Request for New Trial (Within 10 days of Decree)
Date of Last Order _____
- ☒ Other Excluded Motion _____
(Must be prepared to defend exclusion to Judge)

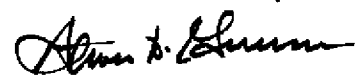
NOTE: If no boxes are checked, filing fee **MUST** be paid.

☐ Motion/Opp IS subject to \$25.00 filing fee ☒ Motion/Opp IS NOT subject to filing fee

Date: 4 May 2, 2013

Tamara Stafford
Printed Name of Preparer

[Signature]
Signature of Preparer



CLERK OF THE COURT

COM
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427043-D
)	DEPT. NO. T
vs.)	
)	DATE OF HEARING: 06/04/2013
)	TIME OF HEARING: 9:30 a.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

CERTIFICATE OF MAILING

I hereby certify that on 3rd day of May, 2013, service of the foregoing PLAINTIFF'S MOTION TO HAVE DEFENDANT HELD IN CONTEMPT OF COURT, TO ENFORCE DECREE OF DIVORCE, TO REDUCE CHILD SUPPORT ARREARS TO JUDGMENT, AND FOR AWARD OF ATTORNEY FEES, was made by placing a copy of same into the United States Mail, first class postage prepaid, at Las Vegas, Nevada, addressed to:

Wesley Allen Lewis
4650 Idaho Avenue
Las Vegas, Nevada 89104



An Employee of The Fine Law Group

Alvin D. Blum

CLERK OF THE COURT

SCHD
The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO,

Plaintiff,

vs.

WESLEY ALLEN LEWIS,

Defendant.

CASE NO. D-10-427043-D
DEPT. NO. T

DATE OF HEARING:
TIME OF HEARING:

SCHEDULE OF ARREARAGES

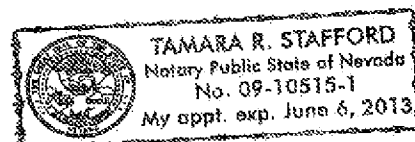
I am owed and entitled to receive certain periodic
monthly payments in the form of child support from Defendant,
WESLEY LEWIS, pursuant to the Decree of Divorce filed July 15,
2011. Defendant has failed to make all of those payments when due
as set forth herein. The following schedules are true and accurate
statements of all payment due dates and of any payments received by
me during the month noted.

Further, affiant sayeth naught

Maria Perdomo
MARIA PERDOMO

SUBSCRIBED AND SWORN to before me this
10th day of May, 2013.

Tamara R. Stafford
NOTARY PUBLIC in and for
County and State



Arrearage Calculation Summary

Perdomo vs. Lewis

Page: 1

Report Date: 05/06/2013

Summary of Amounts Due

Total Principal Due 05/01/2013:	\$7,664.19
Total Interest Due 05/01/2013:	\$410.52
Total Penalty Due 05/01/2013:	\$781.95
Amount Due if paid on 05/01/2013:	\$8,856.67
Amount Due if paid on 05/02/2013:	\$8,859.88
Daily Amount accruing as of 05/02/2013:	\$3.20

Date Due	Amount Due	Date Received	Amount Received	Accum. Arrearage	Accum. Interest
06/01/2011	*440.00	06/01/2011	0.00	440.00	0.00
07/01/2011	*440.00	07/01/2011	0.00	880.00	1.89
08/01/2011	*440.00	08/01/2011	0.00	1,320.00	5.82
09/01/2011	*440.00	09/01/2011	0.00	1,760.00	11.70
10/01/2011	*440.00	10/01/2011	0.00	2,200.00	19.30
11/01/2011	*440.00	11/14/2011	307.00	2,333.00	34.04
12/01/2011	*440.00	12/01/2011	0.00	2,773.00	39.75
01/01/2012	*440.00	01/01/2012	0.00	3,213.00	52.11
02/01/2012	*440.00	02/01/2012	0.00	3,653.00	66.40
03/01/2012	*440.00	03/01/2012	1,147.35	2,945.65	81.60
04/01/2012	*440.00	04/01/2012	0.00	3,385.65	94.69
05/01/2012	*440.00	05/01/2012	0.00	3,825.65	109.26
06/01/2012	*440.00	06/01/2012	0.00	4,265.64	126.28
07/01/2012	*440.00	07/01/2012	0.00	4,705.64	144.63
08/01/2012	*440.00	08/24/2012	308.00	4,837.64	182.53
09/01/2012	*440.00	09/01/2012	0.00	5,277.65	188.08
10/01/2012	*440.00	10/01/2012	0.00	5,717.65	210.80
11/01/2012	*440.00	11/01/2012	0.00	6,157.65	236.22
12/01/2012	*440.00	12/18/2012	140.66	6,456.99	278.81
01/01/2013	*440.00	01/02/2013	157.54	6,739.45	292.77
	0.00	01/15/2013	149.46	6,589.99	305.37
	0.00	01/15/2013	8.08	6,581.91	305.37

	0.00	01/29/2013	157.54	6,424.37	318.62
02/01/2013	*440.00	02/12/2013	157.54	6,706.83	332.25
	0.00	02/26/2013	149.46	6,557.37	345.76
	0.00	02/26/2013	8.08	6,549.29	345.76
03/01/2013	*440.00	03/12/2013	157.54	6,831.75	359.64
	0.00	03/26/2013	15.85	6,815.90	373.40
04/01/2013	*440.00	04/08/2013	15.85	7,240.04	386.59
	0.00	04/22/2013	15.85	7,224.19	401.17
05/01/2013	*440.00	05/01/2013	0.00	7,664.19	410.52
Totals	10,560.00		2,895.80	7,664.20	410.52

* Indicates a payment due is designated as child support.

Child Support Penalty Table			
Date Due	Amount Due	Accum. Child Sup. Arrearage	Accum. Penalty
06/01/2011	*440.00	0.00	0.00
07/01/2011	*440.00	440.00	3.62
08/01/2011	*440.00	880.00	11.09
09/01/2011	*440.00	1,320.00	22.30
10/01/2011	*440.00	1,760.00	36.77
11/01/2011	*440.00	2,333.00	64.85
12/01/2011	*440.00	2,333.00	75.72
01/01/2012	*440.00	2,773.00	99.27
02/01/2012	*440.00	3,213.00	126.49
03/01/2012	*440.00	2,945.65	155.43
04/01/2012	*440.00	2,945.65	180.38
05/01/2012	*440.00	3,385.65	208.13
06/01/2012	*440.00	3,825.65	240.53
07/01/2012	*440.00	4,265.65	275.50
08/01/2012	*440.00	4,837.65	347.69
09/01/2012	*440.00	4,837.65	358.27
10/01/2012	*440.00	5,277.65	401.53
11/01/2012	*440.00	5,717.65	449.95
12/01/2012	*440.00	6,456.99	531.07
01/01/2013	*440.00	6,739.45	557.66
	0.00	6,589.99	581.66
	0.00	6,581.91	581.66
	0.00	6,424.37	606.91
02/01/2013	*440.00	6,706.83	632.88
	0.00	6,557.37	658.60
	0.00	6,549.29	658.60
03/01/2013	*440.00	6,831.75	685.05
	0.00	6,815.90	711.25
04/01/2013	*440.00	7,240.05	736.37
	0.00	7,224.20	764.14
05/01/2013	*440.00	7,224.20	781.95
Totals	10,560.00	7,224.20	781.95

* Indicates a payment due is designated as child support.

Notes:

Payments are applied to oldest unpaid balance.
 Interest and penalties are calculated using number of days past due.
 Payments apply to principal amounts only.
 Interest is not compounded, but accrued only.
 Penalties calculated on past due child support amounts per NRS 125B.095.

Interest Rates Used by Program:

7.00%	from Jan 1960 to Jun 1979		8.00%	from Jul 1979 to Jun 1981
12.00%	from Jul 1981 to Jun 1987		10.25%	from Jul 1987 to Dec 1987
10.75%	from Jan 1988 to Jun 1988		11.00%	from Jul 1988 to Dec 1988
12.50%	from Jan 1989 to Jun 1989		13.00%	from Jul 1989 to Dec 1989
12.50%	from Jan 1990 to Jun 1990		12.00%	from Jul 1990 to Jun 1991
10.50%	from Jul 1991 to Dec 1991		8.50%	from Jan 1992 to Dec 1992
8.00%	from Jan 1993 to Jun 1994		9.25%	from Jul 1994 to Dec 1994
10.50%	from Jan 1995 to Jun 1995		11.00%	from Jul 1995 to Dec 1995
10.50%	from Jan 1996 to Jun 1996		10.25%	from Jul 1996 to Jun 1997
10.50%	from Jul 1997 to Dec 1998		9.75%	from Jan 1999 to Dec 1999
10.25%	from Jan 2000 to Jun 2000		11.50%	from Jul 2000 to Jun 2001
8.75%	from Jul 2001 to Dec 2001		6.75%	from Jan 2002 to Dec 2002
6.25%	from Jan 2003 to Jun 2003		6.00%	from Jul 2003 to Dec 2003
6.00%	from Jan 2004 to Jun 2004		6.25%	from Jul 2004 to Dec 2004
7.25%	from Jan 2005 to Jun 2005		8.25%	from Jul 2005 to Dec 2005
9.25%	from Jan 2006 to Jun 2006		10.25%	from Jul 2006 to Dec 2007
9.25%	from Jan 2008 to Jun 2008		7.00%	from Jul 2008 to Dec 2008
5.25%	from Jan 2009 to Dec 2012		5.25%	from Jan 2013 to Jun 2013

Report created by:

Marshal Law version 4.0

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The Fine Law Group - Fran@thefinelawgroup.com - (702) 384-8900

End of Report

The Fine Law Group
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Peecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Attorney for Plaintiff


CLERK OF THE COURT

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

Maria Perdomo)	Case No. D-10-427054-D
Plaintiff,)	
vs.)	Dept. No. T
)	
Wesley Lewis)	
Defendant.)	
)	

GENERAL FINANCIAL DISCLOSURE FORM

The judge uses this form to understand the financial position of the Plaintiff and the Defendant. You must fill this form out completely and truthfully.

A. Personal Information:

1. What is your full name? (<i>first, middle, last</i>)	Maria Daniela Perdomo
2. How old are you?	33
3. What is your date of birth?	6/5/2979
4. What is your occupation?	Community Base Instructor
5. What is your highest level of education?	Bachelors Degree

B. Employment Information: (☒ check one)

1. Are you currently employed?

☐ No

☒ Yes If yes, what is the name of your employer? University of NV-Reno

What date were you hired on? (*mm/dd/yy*) 11/1/2011

2. Are you disabled? (☒ check one)

☒ No

☐ Yes If yes, what is the level of your disability? _____

What agency certified you disabled? _____

What is the nature of your disability? _____

C. Attorney Information: *Complete the following sentences:*

1. An Attorney (*has/has not*) _____ has _____ been retained on my behalf for this case.

2. As of today, the attorney has been paid a total of \$5,350 on my behalf.

3. I have a credit with my attorney in the amount of \$4,280.

4. I currently owe my attorney a total of \$0.

5. I owe my prior attorney a total of \$0.

Section 1: Personal Income

Before you can complete the next section you need to figure out your pay frequency.
Your pay frequency is determined by the number of time you are paid each month.

Pay Frequency Table

1.00 = Paid one time per month
2.00 = Paid two times per month
2.17 = Paid every two weeks
4.33 = Paid every week

A. Fill in the line that applies to you. Only complete line 1 OR line 2.

Line #	Income Question	Amount Earned	Number of Hours Worked per Pay Period	Pay Frequency (1.00, 2.00, 2.17, or 4.33)	Monthly Income
1	I am paid a hourly wage in the amount of		x		= \$0.00
2	I am paid a base salary in the amount of	\$708.42	x	2.00	= \$1,416.84

B. Fill in the amount of money you receive each month for the following types of income:

Line #	Income Question	Amount Received Monthly
3	I regularly work overtime and each month earn an average of	
4	I receive bonuses, commissions, or tips in the amount of	
5	I receive a car, gas, housing, or other allowance in the amount of	
6	I receive spousal support in the amount of	
7	I receive social security in the amount of	
8	I receive social security disability in the amount of	
9	I receive workman's compensation benefits in the amount of	
10	I receive unemployment benefits in the amount of	
11	I receive pension or retirement income in the amount of	
12	I receive net rental income in the amount of	
13	I receive income from other sources in the amount of	\$79.00
14	Total Income Received (add lines 3-13)	\$79.00

C. Total monthly income from all sources:

Line #		
15	Total from Line 1 OR 2	\$1,416.84
16	Total from Line 14	\$79.00
17	Total Gross Monthly Income (Add lines 15-16)	\$1,495.84

Section 2: Personal Deductions

A. Fill in the amount of money that is taken out of every paycheck for each of the following deductions:

Line #	Name of Deduction	Amount Deducted
18	Court Ordered Child Support is deducted from every paycheck in the amount of	
19	Federal Income Tax is deducted from every paycheck in the amount of	\$19.00
20	Social Security Tax is deducted from every paycheck in the amount of	
21	Medicare is deducted from every paycheck in the amount of	\$10.22
22	Union Dues are deducted from every paycheck in the amount of	
23	Health Insurance Cost is deducted from every paycheck in the amount of	\$22.46
24	Life, Disability, or Other Insurance Premiums are deducted from every paycheck in the amount of	
25	Federal Health Savings Plan contribution is deducted from every paycheck in the amount of	
26	Retirement, Pension, IRA, or 401(k) contributions are deducted from every paycheck in the amount of	
27	Savings are deducted from every paycheck in the amount of	
28	Other:	
29	Other:	
30	Total Paycheck Deductions	\$51.68
31	Total Monthly Deductions	\$103.36

Section 3: Income Summary

Line #		
32	Total from Line 17	\$1,495.84
33	Total from Line 30	\$103.36
	Net Monthly Income	\$1,392.48

Section 4: Child Information

A. Fill in the table below with the name and date of birth of each of your children, parent the child is living with, and whether the child is from this marriage or relationship:

	Child's Name:	Child's Date of Birth	Whom is child living with? (Mom, Dad, or Both)	Is this child from this marriage / relationship? (Yes or No)
1st	Isabella Lewis	8.10.2006	Both	yes
2nd				
3rd				
4th				
5th				

B. Fill in the table below with the amount of money you spend each month on the following expenses for the children:

	Children's Expenses	1st Child	2nd Child	3rd Child	4th Child	5th Child
1	Clothes, Shoes and Accessories	\$100.00				
2	Unreimbursed Medical Expenses					
3	Telephone and Internet					
4	Entertainment	\$40.00				
5	Food	\$200.00				
6	Insurance (other than health)					
7	Education Related Expenses	\$200.00				
8	Summer Camp/Programs	\$140.00				
9	Vehicle					
10	Transportation Cost for Visitation					
11	Total Monthly Expenses for Children (add lines 1-11)	\$680.00	\$0.00	\$0.00	\$0.00	\$0.00

Section 5: Household Information

A. I live with (number) 0 other adults, including children over the age of eighteen, who contribute to or pay the household expenses in the amount of \$ 0.

Section 6: Personal Expenses

Fill in the table with the amount of money you spend each month on the following expenses and check whether you pay the expense for you, for the other party, or for both of you.

Expense	Monthly Amount of Expense	For Me	For the Other Party	For Both
Home				
Mortgage/Rent/Lease	\$825.00			
Property Taxes				
HOA				
Home Owner's Insurance				
Lawn Care				
Pest Control				
Pool Service				
Security				
Other				
Utilities				
Water				
Electric	\$60.00			
Gas	\$25.00			
Sewer				
Home Phone				
Internet/Cable	\$40.00			
Other				
Medical				
Health Insurance				
Unreimbursed Medical Expenses				
Other				
Transportation				
Car Loan/Lease Payment				
Fuel	\$150.00			
Auto Insurance				
Other				
Personal				
Food (groceries and restaurants)	\$250.00			
Pets	\$40.00			
Cell phone	\$60.00			
Membership Fees				
Clothing, Shoes, etc.	\$50.00			
Dry Cleaning				
Other				
Debts				
Credit Card Payments				
Child Support				
Alimony/Spousal Support				
Student Loans				
Other				
Total Monthly Expenses	\$1,500.00			

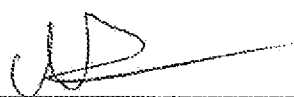
Section 7: Asset and debt Chart

Complete the chart below by listed all assets and debts, the value of each, the amount owed on each, and whose name the asset or debt is under (You, the Other Party, or Both).

Line #	Description of Asset or Debt	Gross Value	Amount Owed	Net Value	Whose Name is on the Account? (Me, the Other Party or Both)
1				\$0.00	
2				\$0.00	
3				\$0.00	
4				\$0.00	
5				\$0.00	
6				\$0.00	
7				\$0.00	
8				\$0.00	
9				\$0.00	
10				\$0.00	
11				\$0.00	
12				\$0.00	
13				\$0.00	
14				\$0.00	
15				\$0.00	
16				\$0.00	
17				\$0.00	
18				\$0.00	
19				\$0.00	
20				\$0.00	
Total Value of Assets (add lines 1-20)		\$0.00	\$0.00	\$0.00	

IMPORTANT: Read the following paragraph carefully.

I am the (☒ check one) ☒ Plaintiff / ☐ Defendant in the above action. I swear or affirm under penalty of perjury that I have read and followed all instructions in completing this Financial Disclosure Form. I understand that, by my signature, I guarantee the truthfulness of the information on this Form. I also understand that if I knowingly make false statements I may be subject to punishment, including contempt of court.


Your Signature

4 / 2 / 13
Date

CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, May 8, 2013, service of the
FINANCIAL DISCLOSURE FORM was made to the following
interested parties in the manner set forth below:



Via 1st Class U.S. Mail, postage fully prepaid, to

Nestor Allen Lewis
4150 Idaho Avenue
Las Vegas, Nevada 89104



Via Facsimile and/or Email pursuant to the Consent to Service By
Electronic Means on file herein to:



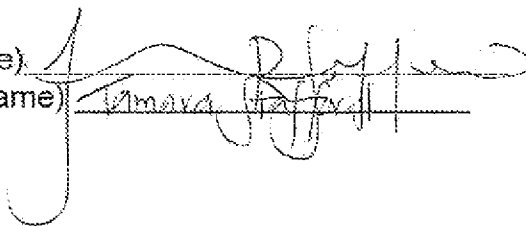
And, via 1st Class U.S. Mail, postage full prepaid, addressed to:

Plaintiff

Respectfully Submitted,

(Signature)

(Printed Name)


Tamara Jaffee



UNIVERSITY OF NEVADA, RENO
PAYROLL DEPARTMENT
RENO, NV
89557
PHONE NUMBER: 775 784 6653

STATEMENT OF EARNINGS

FOR: PERDOMO, MARIA DANIELA

080161758

EMPLOYEE ADDRESS 595 SOUTH GREEN VALLEY PARKWAY UNIT 1924 HENDERSON, NV 89012		DIRECT DEPOSIT Institution: WASH. MUTUAL (CA) Account Number: *****3026 Amount: 589.24		Pay Period End Date: 04/15/13 Pay Date: 04/25/13		ADVICE NUMBER A002539		
TAX DATA		Filing Status: S Allowances: S Additional Act:		Federal		State		
TOTAL GROSS		FEDERAL TAXABLE GROSS		TOTAL TAXES		TOTAL DEDUCTIONS		
Current: 708.42		685.96		9.94		109.24		
Year to Date: 5821.43		5641.71		233.59		900.03		
						\$ 589.24		
HOURS AND EARNINGS				EMPLOYEE TAXES				
Description	Rate	Hours	Current Earnings	Description	Current	Year to Date		
REG PAY			674.69	MEDICARE	9.94	81.60		
BILINGUAL			11.73	FEDERAL TAX		151.79		
TOTAL:			708.42	TOTAL:			9.94	
TOTAL:			233.59	TOTAL:			900.03	
FEDERAL WITHHOLDING PRE-TAX DEDUCTIONS			STANDARD DEDUCTIONS			EMPLOYEE RETIREMENT CONTRIBUTION		
Description	Current	Year to Date	Description	Current	Year to Date	Description	Current	Year to Date
HEALTH INS PRE	22.46	172.72	PERS 1 ERS	86.78	720.31	PERS 1 ERS	86.78	720.31
TOTAL:			TOTAL:			TOTAL:		
22.46			86.78			86.78		
172.72			720.31			720.31		



UNIVERSITY OF NEVADA, RENO
 PAYROLL DEPARTMENT
 RENO, NV
 89557
 PHONE NUMBER: 775 784 6653

STATEMENT OF EARNINGS

FOR: PERDOMO, MARIA DANIELA

000161768

Pay Period End Date: 03/31/13 Pay Date: 04/10/13		ADVICE NUMBER A999532							
EMPLOYEE ADDRESS 595 SOUTH GREEN VALLEY PARKWAY UNIT 1524 RENDERSON, NV 89012		DIRECT DEPOSIT <table border="1"> <tr> <th>Institution</th> <th>Account Number</th> <th>Amount</th> </tr> <tr> <td>WASH. MUTUAL (CA)</td> <td>*****3026</td> <td>548.29</td> </tr> </table>		Institution	Account Number	Amount	WASH. MUTUAL (CA)	*****3026	548.29
Institution	Account Number	Amount							
WASH. MUTUAL (CA)	*****3026	548.29							
TAX DATA Filing Status: 5 Allowances: 5 Additional Dep.		FEDERAL STATE							
TOTAL GROSS Current: 669.39 Year to Date: 5113.01		FEDERAL TAXABLE GROSS Current: 545.82 Year to Date: 4955.75							
TOTAL TAXES Current: 9.38 Year to Date: 223.65		TOTAL DEDUCTIONS Current: 111.62 Year to Date: 790.79							
NET PAY \$ 548.29									
HOURES AND EARNINGS									
Description	Rate	Hours	Current Earnings						
REG PAY			423.21						
REG PAY			269.38						
CLA FUR	16.09	1.94	27.35-						
CLA FUR	14.10	1.86	26.23-						
CLA \$5 FUR	.70	3.53	2.49-						
ALL OTHER			32.27						
TOTAL:		10.71	569.29						
EMPLOYEE TAXES									
Description	Current	Year to Date							
MEDICARE	9.38	71.86							
FEDERAL TAX		151.79							
TOTAL:		9.38	223.65						
FEDERAL WITHHOLDING PRE-TAX DEDUCTIONS									
Description	Current	Year to Date							
HEALTH INS PRE	22.47	157.26							
TOTAL:		22.47	157.26						
STANDARD DEDUCTIONS									
Description	Current	Year to Date							
PERS 1 BBS	89.15	633.53							
TOTAL:		89.15	633.53						
EMPLOYER RETIREMENT CONTRIBUTION									
Description	Current	Year to Date							
PERS 1 BBS	89.15	633.53							
TOTAL:		89.15	633.53						



UNIVERSITY OF NEVADA, RENO
 PAYROLL DEPARTMENT
 RENO, NV
 89557
 PHONE NUMBER: 775 784 6653

STATEMENT OF EARNINGS

FOR: PERDOMO, MARIA DANIELA

000161759

Pay Period End Date: 03/15/13
 Pay Date: 03/25/13
 ADVICE NUMBER
 A992123

EMPLOYEE ADDRESS 595 SOUTH GREEN VALLEY PARKWAY UNIT 1524 HENDERSON, NV 89012		DIRECT DEPOSIT			TAX DATA	
		Institution	Account Number	Amount	Federal	State
		WASH. NATUAL (CA)	*****43026	617.02	Filing Status: S	
					Allowance: 5	
					Additional Fed:	
TOTAL GROSS		FEDERAL TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY	
CURRENT: 740.62		718.16	10.41	113.19	\$ 617.02	
YEAR TO DATE: 4443.72		4308.93	214.27	679.17		
HOURS AND EARNINGS			EMPLOYEE TAXES			
Description	Rate	Hours	Current Earnings	Description	Current	Year to Date
REG PAY			708.38	MEDICARE	10.41	62.45
BILINGUAL			35.27	FEDERAL TAX		151.79
TOTAL:			740.62	TOTAL:	10.41	214.27
FEDERAL WITHHOLDING PRE-TAX DEDUCTIONS			STANDARD DEDUCTIONS		EMPLOYER RETIREMENT CONTRIBUTION	
Description	Current	Year to Date	Description	Current	Year to Date	Description
HEALTH INS PRE	23.46	134.79	PERS 1 ERS	90.73	544.38	PERS 1 ERS
						90.73
						544.38
TOTAL:			22.46	134.79	TOTAL:	90.73
						544.38



UNIVERSITY OF NEVADA, RENO
 PAYROLL DEPARTMENT
 RENO, NV
 89557
 PHONE NUMBER: 775 784 6653

STATEMENT OF EARNINGS

FOR: LEWIS, MARIA

000161758

Pay Period End Date: 02/28/13
 Pay Date: 03/08/13
 ADVICE NUMBER
 A989206

EMPLOYEE ADDRESS 595 SOUTH GREEN VALLEY PARKWAY UNIT 1524 HENDERSON, NV 89012		DIRECT DEPOSIT		TAX DATA	
		Institution NASH. MUTUAL (CN)	Account Number *****3026	Amount 586.85	Federal State Filing Status: S Allowances: 2 Additional Amt:
TOTAL GROSS		FEDERAL TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current: 740.52		718.15	40.57	113.30	
Year to Date: 3703.10		3590.77	203.86	565.98	\$ 586.85
HOURS AND EARNINGS			EMPLOYEE TAXES		
Description	Rate	Hours	Current Earnings	Description	Current Year to Date
REG PAY			708.36	MEDICARE	16.42 52.07
BILINGUAL			35.27	FEDERAL TAX	30.15 151.79
TOTAL:			740.52	TOTAL:	40.57 203.86
FEDERAL WITHHOLDING PRE-TAX DEDUCTIONS			STANDARD DEDUCTIONS		EMPLOYER RETIREMENT CONTRIBUTION
Description	Current	Year to Date	Description	Current	Year to Date
HEALTH INS PRE	22.47	112.33	PERS 1 BEN	90.73	453.65
TOTAL:			22.47	112.33	TOTAL: 90.73 453.65



Human Resources/Payroll Action Form (PAF)

This is a Human Resources/Payroll document only, and does not constitute a contract or terms of employment.

Prepared By **PAUL LESSICK** 03/25/2013

Last, First MI
Name **PERDOMO, MARIA DANIELA** Effective Date **03/26/2013**

ID **000161768** Campus **UNR**

Employee Type **CLASSIFIED** Term **C**

Vice President **PROV** College **COOP** Dept Code **SEXT - LV** Dept Name **SOUTHERN EXT AREA - LAS VEGAS**

Contract Amount **17,002.06** Base Sal **29,440.80** Pos No **42026** Begin Date **12/31/2011** End Date **99/99/9999**

Job Class Code **05.170** Job Title **COMMUNITY BASED INSTR II** Grade **25** Step **01**

SPECIAL CONDITIONS FOR CLASSIFIED EMPLOYEES ONLY:
This box must be checked and initiated upon initial hire and when time limits are renewed.
☐ Employee is not eligible for layoff rights per NAC 284.425.

Account Number	Earnings Code	Hourly or Pay Amount	% of FTE	Payroll Start Date	Payroll Stop Date
1 1320-151-73KJ	CLA	674.69	55.00	03/26/2013	06/30/2013
2 1320-151-73KJ	BLN	33.73		03/26/2013	06/30/2013
3					
4					
5					
6					
7					
8					
9					
10					

Retirement Code **1** FICA Code **M** Cert Method **15517C** State Hire Date **10/10/2011** Pay Progression Date **09/03/2013**

Appointments Status **A** FTE % **55.00** Pay Rate **708.42** Rate Code **P**

COMMENTS: PROJECT OF LIMITED DURATION AS PER NAC 284.425
THIS IS A GRANT FUNDED POSITION AND IS CONTINGENT UPON FUNDING

ACTION CODES:
ACTION CODE % CHANGE

POSITION CONTROL/BUDGET

SUPERVISOR

RECOMMENDING AUTHORITY

APPOINTING AUTHORITY

HUMAN RESOURCES

DATE

DATE

DATE

DATE

DATE

Employee must complete all of the following before this document is accepted by the Nevada System of Higher Education.

I am not retired under the Public Employees Retirement System (PERS).

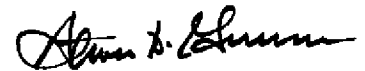
I am not currently required to have a Visa to be employed in the United States. If so, specify Visa Type and Expiration Date

I am not currently employed by the Nevada System of Higher Education (University of Nevada Las Vegas, University of Nevada Reno, College of Southern Nevada, Truckee Meadows Community College, Western Nevada College, Great Basin College, Nevada State College, or the Desert Research Institute) on another campus. If so, specify campus and job title below:

I accept all the conditions listed on this document.

EMPLOYEE SIGNATURE

DATE



CLERK OF THE COURT

COM
THE FINE LAW GROUP
FRANCES-ANN FINE, ESQUIRE
Nevada Bar No. 0025
8975 South Pecos Road, Suite 5
Henderson, Nevada 89074
Telephone: 702/384-8900
Facsimile: 702/384-6900
fran@thefinelawgroup.com
Attorney for Plaintiff
MARIA DANIELA LEWIS nka
MARIA DANIELA PERDOMO

DISTRICT COURT

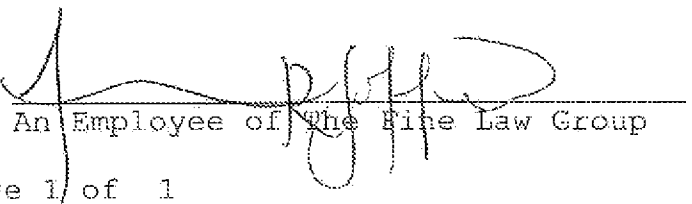
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT. NO. T
vs.)	DATE OF HEARING: 06/04/2013
)	TIME OF HEARING: 9:30 a.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

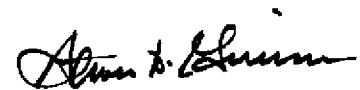
CERTIFICATE OF MAILING

I hereby certify that on 17th day of May, 2013, service of the foregoing PLAINTIFF'S MOTION TO HAVE DEFENDANT HELD IN CONTEMPT OF COURT, TO ENFORCE DECREE OF DIVORCE, TO REDUCE CHILD SUPPORT ARREARS TO JUDGMENT, AND FOR AWARD OF ATTORNEY FEES and FINANCIAL DISCLOSURE FORM, was made by placing a copy of same into the United States Mail, first class postage prepaid, at Las Vegas, Nevada, addressed to:

Wesley Allen Lewis
3150 South Nellis Blvd. #1081
Las Vegas, Nevada 89121



An Employee of The Fine Law Group



CLERK OF THE COURT

PATRICIA A. MARR, LTD.
PATRICIA A. MARR, ESQ.
Nevada Bar No. 8846
4505 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103
(702) 353-4225 (phone)
(702) 737-1776 (fax)
Lvlaw03@yahoo.com
Attorney for Defendant
WESLEY ALLEN LEWIS

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS aka
MARIA DANIELA PERDOMO,

Plaintiff,

v.

WESLEY ALLEN LEWIS,

Defendant.

Case No. D-10-427054

Dept No. T

Hearing Date: 6/04/13

Hearing Time: 9:30 am

DEFENDANT'S RESPONSE
AND COUNTERMOTION FOR
ATTORNEY'S FEES AND RELATED
RELIEF

COMES NOW, Defendant, WESLEY ALLEN LEWIS, by and through his counsel,
PATRICIA A. MARR, ESQ. of PATRICIA A. MARR, LTD., and files his Response as follows.
Defendant's Response is made and based upon the following Memorandum of Points and
Authorities, the pleadings and papers on file herein, the Declaration of Defendant, WESLEY

///

///

///

///

///

///

1 ALLEN LEWIS, and any oral argument that the Court may hear at the time of hearing in this
2 matter.

3
4 Dated this 27th day of May, 2013.

5 PATRICIA A. MARR, LTD.

6
7
8
9 PATRICIA A. MARR, ESQ.
Nevada Bar No. 8846
4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103
10 (702) 353-4225 (phone)
11 (702) 737-1776 (fax)
12 Lvlaw03@yahoo.com
13 Attorney for Defendant
14 WESLEY ALLEN LEWIS

15 MEMORANDUM OF POINTS AND AUTHORITIES

16 I.

17 FACTS

18 The parties in this action, Plaintiff, Maria Daniela Lewis ("Maria") and Defendant,
19 Wesley Allen Lewis ("Wesley"), were divorced by Decree of Divorce on July 15, 2011. There is
20 one minor child born the issue of the parties' marriage, to-wit: Isabella Sara Lewis, DOB: August
21 10, 2006.
22

23 On February 5, 2013, the Hearing Master for the Nevada Division of Welfare and Support
24 Services modified Wesley's child support obligation based upon her review of Wesley's payroll
25 records. In fact, the evidence presented at the hearing, including, *inter alia*, the testimony of the
26 parties, revealed that Maria's gross monthly income is more than Wesley's. Moreover, at the
27
28

1 hearing Maria represented that she has health insurance benefits for the minor child through her
2 employer, while Wesley does not.¹ In accordance with the same, the Hearing Master ordered
3 Wesley to provide health insurance for the minor child, if available through his employer. Notably,
4 the Decree also provides that Wesley shall only provide medical and dental insurance for the minor
5 child "if available through his employer." (Decree, p. 4, ll. 24-26) Finally, the Hearing Master has
6 already reduced Wesley's child support arrears to judgment. (Exhibit A). Notably, the arrears
7 were based upon the District Attorney's Office accounting.² (Exhibit B). Maria's assertion that
8 Wesley was "somehow able to convince the District Attorney that he had ...paid child support in
9 the amount of \$ 2,391.00" and that the Court based its decision without the provision of any
10 evidence is nonsensical in light of the facts. Both parties testified regarding their income and the
11 Court relied upon the accounting from the District Attorney.

12
13 The Decree also provides that the "parents agree that the father and child shall obtain
14 passports, so that the child can travel internationally with each parent." (Parenting Agreement, p. 6,
15 ll. 8-9. However, subsequent to the divorce, Maria has threatened to take the minor child to
16 Venezuela and never return. Maria's threats are credible and can be readily implemented. Maria is
17 also recognized as a citizen of Venezuela, where her family has strong political ties with high
18 ranking governmental officials. In fact, Maria's father was the Director of Interior to the President
19 of Venezuela. (Exhibit C). Accordingly, Wesley has a genuine and reasonable fear that if Maria is
20 permitted to take the minor child to Venezuela, there is a strong probability that he will never see
21
22
23
24
25

26
27 ¹ The Hearing Master's Order was based upon Maria's representation that she receives insurance for the minor
28 child through her employer while Wesley does not.

² Based upon the difference in income between the parties Maria should have been ordered to pay the
difference of \$45.26 per month to Wesley, or at a minimum, Wesley should have received a credit each month in this
amount toward his arrears.

1 the minor child again.

2 Notably, the United States Embassy in Caracas has no legal jurisdiction in Venezuela to
3 enforce any court order regarding custody cases, nor can it take custody of any minor US Citizen
4 and return or help re-abduct the child to the U.S. If the parents cannot work out an amicable
5 settlement of a child custody dispute, the only recourse may be a court action in the country where
6 the child is located. The law of the country in which the child is physically present, even
7 temporarily, is controlling. If the parent thinks the child is at risk s/he must call the police and file a
8 police report. [<http://caracas.uscembassy.gov/citizen-service/emergency-services/children-issues/>].
9

10 Further, Consular officers have no legal authority to obtain physical custody of children and
11 return them to the United States. They cannot assist a parent in acquiring physical custody of a
12 child illegally or by force or deception. Furthermore, consular officers cannot help a parent to leave
13 a foreign country with a child whose custody is disputed, if the departure would violate a court
14 order or the laws of the foreign country.³
15

16 Nonetheless, Maria has family members that reside in California, including her mother.
17 Wesley defers to the Court as to whether Maria should be permitted to travel with the minor child
18 to her country of Venezuela when she has made numerous threats that the child will not be returned
19 to the United States.

20 The Decree further provides that each parent shall be "entitled to reasonable communication
21 with the child" and shall refrain from interfering with the child's right to privacy during the
22 conversations. (Parenting Agreement, p. 6, ll. 13-15). However, Maria frequently calls to speak
23 with the minor child late in the evening when the child is asleep. Further, the speakerphone has
24 been utilized when Maria contacts the minor child while in Wesley's vehicle because the minor
25
26

27
28 ³ Additionally, Venezuela has a high crime rate and is well known for its high incidents of kidnapping and robbery. (Exhibit D).

1 child frequently inadvertently hangs up on Maria by pressing her cheek against the phone.
2 Nonetheless, this issue has been resolved as Wesley has purchased a cell phone for the minor child
3 that does not allow for accidental "hang-ups." Maria's assertions regarding this issue are at best --
4 frivolous.
5

6 Maria's assertions herein are inaccurate and unwarranted. Maria further alleges that Wesley
7 has failed to provide "appropriate housing and sleeping accommodations" for the minor child.
8 however, again, Maria's assertion is completely unfounded in fact. The minor child enjoys her own
9 bedroom and bathroom at Wesley's home, in addition to a home environment that caters to her
10 every need and whim. (Exhibit E). The minor child's grandfather has placed a tire swing in the
11 front yard for her; the minor child has her own school desk for homework; there is a garden and
12 herbs which the minor child has planted in the backyard, as well as wildlife; and Wesley's parents
13 have even installed security cameras!
14

15
16 Contrary to Maria's baseless allegations the minor child does not sleep on the floor. Wesley
17 has learned however, that Maria's housing accommodations do not permit the minor child to have
18 her own room and in fact, the minor child sleeps with Maria and her boyfriend in the same bed. If
19 this fact is indeed accurate, then Maria's current custodial status must be re-evaluated.
20

21 Maria has also alleged that Wesley has not complied with the right of first refusal.
22 However, Wesley's work schedule is tailored around the minor child and in complete compliance
23 with the right of first refusal. Wesley has never informed the minor child to "keep secrets from
24 [Maria]." If the minor child is quiet and distant upon her return to Maria's house it is likely
25 because she would prefer to remain with Wesley.
26

27 While Maria attempts to invent contempt for Wesley, it is Maria herself that has been
28

1 conducting herself in a contemptuous manner. For example, the Decree provides that [Wesley]
2 shall claim the minor child for tax purposes in Even numbered years, and [Maria] shall claim the
3 minor child for taxes in Odd numbered years. Despite the Court's Order, Maria claimed the minor
4 child again, [for 2012] so that Wesley was unable to do so. (Exhibit F).

6 II.

7 ARGUMENT

8 **1. MARIA'S MOTION IS FRIVOLOUS AND IS BASED UPON ANGER RATHER** 9 **THAN FACTS. SANCTIONS ARE APPROPRIATE.**

10 NRCP 11 provides in pertinent part:

11 (b) Representations to Court. By presenting to the court (whether by signing, filing,
12 submitting, or later advocating) a pleading, written motion, or other paper, an attorney or
13 unrepresented party is certifying that to the best of the person's knowledge, information, and belief,
14 formed after an inquiry reasonable under the circumstances,—

15 (1) *it is not being presented for any improper purpose, such as to harass or to cause*
16 *unnecessary delay or needless increase in the cost of litigation;*

17 (2) the claims, defenses, and other legal contentions therein are warranted by existing law
18 or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the
establishment of new law;

19 (3) the allegations and other factual contentions have evidentiary support or, if specifically
20 so identified, are likely to have evidentiary support after a reasonable opportunity for further
21 investigation or discovery; and

22 (4) the denials of factual contentions are warranted on the evidence or, if specifically so
23 identified, are reasonably based on a lack of information or belief.

24 [As amended; effective January 1, 2005.]

25 (c) Sanctions. If, after notice and a reasonable opportunity to respond, the court determines
26 that subdivision (b) has been violated, the court may, subject to the conditions stated below, impose
27 an appropriate sanction upon the attorneys, law firms, or parties that have violated subdivision (b)
or are responsible for the violation.

28 (emphasis added).

1 Wesley is not in contempt of Court, nor has he attempted to "fool" anyone, as Maria so
2 vehemently asserts. The Hearing Master has already adjudicated Wesley's child support arrears
3 and reduced the same to judgment. Moreover, the modification of Wesley's child support was
4 based upon the testimony of the parties, the accounting from the District Attorney's Office and the
5 paystubs of the parties. Maria, apparently unhappy with the reality of the situation, has filed an
6 unnecessary Motion and in doing so, wasted everyone's resources, including this Honorable Court.
7 Worse yet, Maria has attempted to manufacture incidents of contempt against Wesley as
8 vindication for the modification of his support obligation. Such conduct should not be tolerated
9 and Maria should be subject to NRCP 11 sanctions.

12 Maria had an opportunity to object to the Hearing Master's Decision. She failed to do so.
13 Nonetheless, Maria's Motion, including her request for a retroactive increase in child support must
14 be denied as a matter of law.

16 **2. WESLEY SHOULD BE AWARDED HIS ATTORNEY'S FEES.**

17 Additionally, Wesley should be awarded his attorney's fees for incurred for having to
18 respond to Maria's frivolous Motion. NRS 18.010 provides:

21 2. In addition to the cases where an allowance is authorized by specific statute, the court may
22 make an allowance of attorney's fees to a prevailing party:

23 (a) When the prevailing party has not recovered more than \$20,000; or

24 (b) Without regard to the recovery sought, when the court finds that the claim, counterclaim,
25 cross-claim or third-party complaint or defense of the opposing party *was brought or maintained*
26 *without reasonable ground or to harass the prevailing party.* The court shall liberally construe the
27 provisions of this paragraph in favor of awarding attorney's fees in all appropriate situations. It is
28 the intent of the Legislature that the court award attorney's fees pursuant to this paragraph and
impose sanctions pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all appropriate
situations to punish for and deter frivolous or vexatious claims and defenses because such claims
and defenses overburden limited judicial resources, hinder the timely resolution of meritorious

1 claims and increase the costs of engaging in business and providing professional services to the
2 public.

3 3. In awarding attorney's fees, the court may pronounce its decision on the fees at the
4 conclusion of the trial or special proceeding without written motion and with or without
5 presentation of additional evidence.

6 (emphasis added).

7 In this action, Maria's allegations are entirely without merit. Accordingly, Wesley should
8 prevail and should be awarded his attorney's fees.

9 **3. WESLEY SHOULD BE PERMITTED TO CLAIM THE MINOR CHILD FOR**
10 **THE NEXT TWO TAX YEARS.**

11 The Decree provides that [Wesley] shall claim the minor child for tax purposes in Even
12 numbered years, and [Maria] shall claim the minor child for taxes in Odd numbered years. [Decree,
13 p. 5, ll. 15-18]. Despite the Court's Order, Maria claimed the minor child again, [for 2012] so that
14 Wesley was unable to do so for his tax year. Accordingly, Maria should be admonished for her
15 deliberate and contemptuous behavior and Wesley should receive a tax deduction for the minor
16 child for the next two (2) years.
17

18 **III.**

19 **CONCLUSION**

20 Based upon the above and foregoing, Defendant requests that Plaintiff's Motion be
21 denied in its entirety and that Defendant be awarded his attorney's fees for having to respond to
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1 the Motion.
2

3 Dated this 27th day of May, 2013.
4

PATRICIA A. MARR, LTD.


PATRICIA A. MARR, ESQ.
Nevada Bar No. 8846
4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103
(702) 353-4225 (phone)
(702) 737-1776 (fax)
Lvlaw03@yahoo.com
Attorney for Defendant
WESLEY ALLEN LEWIS

1
2 DECLARATION OF WESLEY ALLEN LEWIS IN SUPPORT OF RESPONSE

3 WESLEY ALLEN LEWIS, being first duly sworn under the penalties of perjury makes
4 the following Declaration and deposes and says:
5

6 That I am the Defendant in the above-referenced action;

7 That I have read the *Response* and know the contents thereof; that the same is true of
8 my own knowledge, except as to those matters therein contained stated upon information
9 and belief, and as to those matters, I believe them to be true.
10

11 WHEREFORE, it is respectfully requested that this Court deny Plaintiff's *Motion*
12 in its entirety and award me attorney's fees incurred in response to the same.
13

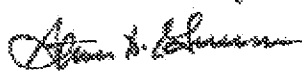
14 I declare under penalty of perjury under the laws of the State of Nevada (NRS 53.045
15 and 28 U.S.C. §1746), that the foregoing is true and correct.

16 Dated this ____ day of May, 2013.
17

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19 
20 WESLEY ALLEN LEWIS
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EXHIBIT A

MIRAG
STEVEN B. WOLFSON
DISTRICT ATTORNEY
Nevada Bar No. 001565
FAMILY SUPPORT DIVISION
1908 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5565
(702) 671-9200
TDD (702) 385-7436 (for the hearing impaired)
800342200A


CLERK OF THE COURT

District Court
CLARK COUNTY, NEVADA

Nv DHHS Div Of Welfare & Supp Services, and (Maria
Daniela Lewis),
Petitioner,
vs.
Wesley Allen Lewis,
Respondent.

Case No. R11161532R

Department No. CHILD SUPPORT

MASTER'S RECOMMENDATION

This matter having been heard on FEBRUARY 05, 2013 before the undersigned Hearing Master, having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

Parties present: ☒ Respondent ☒ Respondent's attorney ☒ Petitioner ☐ Petitioner's attorney

☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

Respondent's gross monthly income (GMI) : formula amount % of GMI=

Basis for deviation from state formula:

Respondent is to pay current support for the child(ren), Isabella Sara Lewis.

CHILD SUPPORT

Respondent is to pay monthly:

\$0.00 child support
medical support (in lieu of health insurance)
spousal support
\$30.00 arrears payment

☒ ARREARAGES ☐ ARREARAGES NOT ADDRESSED AT THIS HEARING

Arrears/Obligation period is through 09/30/12.

Arrears, interest, penalty calculated through 09/30/12 by audit. For accounting purposes next payment falls due 10/01/12.

child support arrearage of	\$2,521.00	plus interest of	\$100.07	penalty of	\$399.10
medical support arrearage of		plus interest of		penalty of	
spousal support arrearage of		plus interest of			
medical expense arrearage of					
genetic test costs of					
total arrearages of	\$2,521.00	total interest	\$100.07	total penalty	\$399.10

GRAND TOTAL (arrearages + interest + penalty) = \$3,020.17

☐ The total arrears are hereby confirmed.

☒ The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 990.440. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B 095.

☐ Arrears of \$_____ subject to modification until _____, and arrears of \$_____ reduced to judgment.

☒ Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.

☐

\$ 38.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

Respondent's INCOME SHALL BE WITHHELD for the payment of support.

☐ Good cause to stay income withholding is based on: _____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.

☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____ is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

☐ Respondent is referred to Employment Services for an appointment on _____ at _____ AM.

☒ Health insurance coverage for the minor child(ren) herein:

☒ Respondent to provide; ☐ Petitioner to provide, excluding Medicaid; ☐ Both Parties to provide;

☒ if available through employer. ☐ shall provide per court order.

☒ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING

☒ MODIFICATION OF PRIOR ORDER:

☒ Modification effective 2-1-2013.

☒ This order modifies a previously existing, previously controlling support order. By this modification, this tribunal assumes or retains continuing, exclusive jurisdiction of the child support obligation for the child(ren) and parties identified in this order. Modification is proper for the following reason(s):

☒ The previously controlling order is from CLARK COUNTY, NV, dated 7-15-2011, #D-10-427054-D.

☒ An individual party, WESLEY LEWIS, has requested modification of the previously controlling Nevada support order.

☐ An individual party, _____, has requested modification; this tribunal has personal jurisdiction over the non-movant and the issuing state (the state whose order controlled prior to this modification) is no longer the residence of any individual party/contestant or child(ren).

☐ An individual party, _____, has requested modification; all individual parties and children now reside in Nevada.

☐ All parties have filed written consent with the tribunal whose order controlled prior to this modification for this tribunal to modify the support obligation and assume continuing, exclusive jurisdiction.

☐ SUSPENSION OF LICENSES:

PAYMENTS

Sherry S. Williams, District Attorney, Nevada, 201 751 4455
Family Support Division
1704 East Flamingo Road, Suite 200
Las Vegas, NV 89119-3406
Phone: 702-438-4200 / 702-438-5400 (for case tracking inquiries)

All mailed payments MUST be made in the form of a cashier's check, money order or business check ONLY, made payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are also accepted.

Payments can be mailed to:

State Collection and Disbursement Unit (SCaDU)
P.O. Box 98958
Las Vegas, Nevada 89193-8958

Payments can be made in person at:

State Collection and Disbursement Unit (SCaDU)
1900 East Flamingo Road
Las Vegas, Nevada 89119-5168

Additionally, the following information must be included with each payment: name (first, middle, last) of person responsible for paying child support, social security number of person responsible for paying child support, child support case number, and name of petitioner (first and last name of person receiving child support).

NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.

NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.

NOTICE: Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99B.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095. If the Respondent pays support through income withholding and the full obligation is not met by the amount withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be subject to assessment of penalties and interest. The Respondent may avoid these additional costs by making current support payments each month. If another state takes jurisdiction and obtains a new order, Nevada interest and penalties will only be calculated to the date of the new order and will be enforced.

NOTICE: Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

NOTICE: Objections/Appeals are governed by EDCR 1.40(c) and (3). You have ten (10) days from receipt of this Master's Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a Final Order/Judgment being ordered by District Court. However, the Master's Recommendation is not an Order/Judgment unless signed and filed by a Judge.

NOTICE: Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written Notice of Entry of Judgment.

NOTICE: Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address, change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10) days of such change.

Respondent to bring new financial statement and proof of income next date.

This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

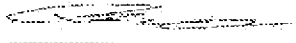
Motion for modification per NRS 125B.145(4). Pursuant to Wright v. Osburn, Petitioner's income is \$1,605. 18% of her GMI is \$288.90. Respondent's income is \$1,353.58 and 18% is \$243.64. Subtracting the lesser amount from the

greater amount results in a difference of \$45.26 which petitioner should pay to respondent. At this time, respondent has no obligation of support.

NEXT HEARING DATE IS Off Calendar in Courtroom in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: FEBRUARY 05, 2013


MASTER


Respondent/Respondent's Attorney
Receipt of this document is
acknowledged by my signature.

ORDER/JUDGMENT

☒ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3944. The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an ORDER/JUDGMENT of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. The parties are ordered to comply with this Order/Judgment.

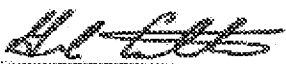
☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ IT IS HEREBY ORDERED that the Master's Recommendation IS affirmed and adopted as an ORDER/JUDGMENT of the District Court this _____ day of _____, 20____.

☐ IT IS HEREBY ORDERED that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20____ and this matter is remanded to Child Support Court on _____, 20____ at _____ M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

By: 
DEPUTY DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 190
Las Vegas, Nevada 89119-5168

Steven B. Wolfson, District Attorney, Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road, Suite 190
Las Vegas, Nevada 89119-5168
(702) 461-1100 (702) 461-565 (fax) (702) 461-565 (toll-free)

1 NEL
2 Steven B. Wolfson, District Attorney
3 Nevada Bar No. 001565
4 Family Support Division
5 1900 East Flamingo Road, Suite 100
6 Las Vegas, Nevada 89119-5168
7 (702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)
8 8003422004

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DISTRICT COURT
CLARK COUNTY, NEVADA

9 Nv Dhhs Div Of Welfare & Supp Services,
10 (Maria Daniela Lewis),

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Petitioner,

vs.

Wesley Allen Lewis,

Respondent.)

Case no. R11161532R

Dept. no. CHILD SUPPORT

NOTICE OF ENTRY OF ORDER/JUDGMENT

To: WESLEY ALLEN LEWIS, Respondent

Please take notice that the enclosed order/judgment against the respondent WESLEY ALLEN LEWIS was entered in the above-entitled matter on February 05, 2013.

CERTIFICATE OF MAILING

The foregoing Notice of Entry of Order/Judgment was served upon Wesley Allen Lewis by mailing a copy thereof, first class mail, postage prepaid to 4650 Idaho Ave., Las Vegas, NV 89104 on the 1st day of March, 2013.

/s/ DA Springer
Employee, District Attorney's Office
Family Support Division

OFFICE OF THE DISTRICT ATTORNEY



STEVEN B. WOLFSON
District Attorney

Family Support Division

(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

Court Team
1900 East Flamingo Road, Suite 100, Las Vegas, NV 89119-5168
Fax: (702) 366-2390

TERESA M. LOWRY
Assistant District Attorney

CHRISTOPHER J. LALLI
Assistant District Attorney

MARY-ANNE MILLER
Clerk/Counsel

JEFFREY J. WITTHUN
Assistant Director

EA-E

March 1, 2013

WESLEY ALLEN LEWIS
4650 IDAHO AVE
LAS VEGAS NV 89104

Re: NV DHHS DIV OF WELFARE & SUPP SERVICES, (Maria
Daniela Lewis) vs. Wesley Allen Lewis
Our case no.: R11161532R

Dear Sir or Madam:

Enclosed is a copy of the order entered in the above case. Please note the continued date on your calendar, if one is specified for you. All payments must be made in strict accordance with the Payment Instructions stated in the order. Any direct payments given to the custodial parent will be considered a gift and no credit will be given. Payments not made due to unemployment will have to be made up at a later date. Our office must be notified immediately of any change of residence address and/or employment.

Pursuant to law, any of the parties involved in this lawsuit has the right to have this order reviewed for an adjustment of the child support order in compliance with state guidelines every three years. An application for review and adjustment may be obtained by writing or directly contacting our office.

Once you have obtained an application you may request review and adjustment by mailing or leaving the completed application, with all required financial records, at the address listed above.

Sincerely,

D. Vaughn
Family Support Specialist

Enclosure

080076

EXHIBIT B

**DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 E. FLAMINGO RD SUITE 100
LAS VEGAS NV 89119**

NCP Financial Transaction History

Date: 05/14/2013

NCP: Wesley Lewis
CST: Maria Lewis
Obligation: Child Support
Office: Clark Co District Attorney

Docket#: RJ116152R

PAGE

PAGE

PAGE

PAGE

Case ID: 800342260A

Transaction Date From: 08/23/2011

Transaction Date To: 05/24/2013

Received Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Credit Balance	Arrears Distributed	Interest Distributed	Interest Charged	Penalty Distributed	Penalty Charged
05/05/2013	05/06/2013	Income Withholding									
05/01/2013	05/01/2013	Monthly Obligation	0.00				15.05				
04/30/2013	04/30/2013	Month end accrual of Interest/Penalty									
04/22/2013	04/22/2013	Income Withholding					15.85		11.44		
04/08/2013	04/08/2013	Income Withholding					15.85				
04/01/2013	04/01/2013	Monthly Obligation	0.00				15.85				
03/31/2013	03/31/2013	Month end accrual of Interest/Penalty									
03/26/2013	03/26/2013	Income Withholding							11.86		
03/12/2013	03/12/2013	Income Withholding					15.85				
03/01/2013	03/01/2013	Order Entry					257.54				
02/25/2013	02/25/2013	Monthly Obligation	0.00								
02/12/2013	02/12/2013	Income Withholding		149.46			6.08				
02/01/2013	02/01/2013	Monthly Obligation	307.00	157.54							
01/29/2013	01/29/2013	Income Withholding									
01/15/2013	01/15/2013	Income Withholding					157.54				
01/02/2013	01/02/2013	Income Withholding		149.46			8.08				
01/01/2013	01/01/2013	Monthly Obligation	307.00	157.54							
12/31/2012	12/31/2012	Month end accrual of Interest/Penalty									
12/21/2012	12/21/2012	Month end accrual of Unpaid Support			166.34						16.63
12/18/2012	12/18/2012	Income Withholding		140.66							
12/01/2012	12/01/2012	Monthly Obligation	307.00								
11/30/2012	11/30/2012	Month end accrual of Interest/Penalty									30.70

Received Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Credit Balance	Arrears Distributed	Interest Distributed	Interest Charged	Penalty Distributed	Penalty Charged
10/31/2012	10/31/2012	Month end accrual of Interest/Penalty									
10/31/2012	10/31/2012	Month end accrual of Unpaid Support									30.70
10/01/2012	10/01/2012	Monthly Obligation	307.00		307.00						
09/30/2012	09/30/2012	Month end accrual of Interest/Penalty									
09/30/2012	09/30/2012	Month end accrual of Unpaid Support			307.00						30.70
09/01/2012	09/01/2012	Monthly Obligation	307.00								
08/23/2012	08/24/2012	NCP Payment		307.00			1.00				
08/01/2012	08/01/2012	Monthly Obligation	307.00								
07/31/2012	07/31/2012	Month end accrual of Interest/Penalty									
07/31/2012	07/31/2012	Month end accrual of Unpaid Support			307.00						30.70
07/01/2012	07/01/2012	Monthly Obligation	307.00								
06/30/2012	06/30/2012	Month end accrual of Interest/Penalty									
06/30/2012	06/30/2012	Month end accrual of Unpaid Support			307.00						30.70
06/01/2012	06/01/2012	Monthly Obligation	307.00								
05/31/2012	05/31/2012	Month end accrual of Interest/Penalty									
05/31/2012	05/31/2012	Month end accrual of Unpaid Support			307.00						30.70
05/01/2012	05/01/2012	Monthly Obligation	307.00								
04/30/2012	04/30/2012	Month end accrual of Interest/Penalty									
04/30/2012	04/30/2012	Month end accrual of Unpaid Support			307.00						30.70
04/01/2012	04/01/2012	Monthly Obligation	307.00								
03/31/2012	03/31/2012	Month end accrual of Interest/Penalty									
03/31/2012	03/31/2012	Month end accrual of Unpaid Support			307.00						30.70
03/19/2012	03/20/2012	Federal Offset Intersect Payment			307.00		1162.00				
03/01/2012	03/01/2012	Monthly Obligation	307.00								
02/29/2012	02/29/2012	Month end accrual of Interest/Penalty									
02/29/2012	02/29/2012	Month end accrual of Unpaid Support			307.00						30.70
02/01/2012	02/01/2012	Monthly Obligation	307.00								
01/31/2012	01/31/2012	Month end accrual of Interest/Penalty									
01/31/2012	01/31/2012	Month end accrual of Unpaid Support			307.00						30.70
01/01/2012	01/01/2012	Monthly Obligation	307.00								
12/31/2011	12/31/2011	Month end accrual of Interest/Penalty									
12/31/2011	12/31/2011	Month end accrual of Unpaid Support			307.00						30.70
12/01/2011	12/01/2011	Monthly Obligation	307.00								

[illegible]

Received Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Credit Balance	Arrears Distributed	Interest Distributed	Interest Charged	Penalty Distributed	Penalty Charged
12/01/2011	12/01/2011	Monthly Obligation	307.00								
10/31/2011	10/31/2011	Month end accrual of Interest/Penalty									
10/31/2011	10/31/2011	Month end accrual of Unpaid Support			307.00						30.75
10/01/2011	10/01/2011	Monthly Obligation	307.00								
09/30/2011	09/30/2011	Month end accrual of Interest/Penalty									
09/30/2011	09/30/2011	Month end accrual of Unpaid Support			307.00						30.75
09/01/2011	09/01/2011	Order Entry									
09/01/2011	09/01/2011	Monthly Obligation	307.00								
08/31/2011	08/31/2011	Month end accrual of Interest/Penalty									
08/31/2011	08/31/2011	Month end accrual of Unpaid Support			440.00						44.00
08/23/2011	08/23/2011	Monthly Obligation	440.00								
08/23/2011	08/23/2011	Order Entry									
Totals											

Report Date: 05/14/2013

**Account Balance Summary Report
for Wesley Lewis, Non Custodial Parent**

	Case Total	Docket Total	Arrears	Interest	Penalty
Grand Total For NCP	3235.80	3235.80	2599.70	189.67	446.43
800342200A: Lewis, Maria	3235.80		2599.70	189.67	446.43
R11161532R / 02		3235.80	2599.70	189.67	446.43
Grand Total For NCP	3235.80	3235.80	2599.70	189.67	446.43

These figures have been calculated using information in the possession of the District Attorney's Office

DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 E. FLAMINGO RD SUITE 100
LAS VEGAS NV 89119

EXHIBIT C













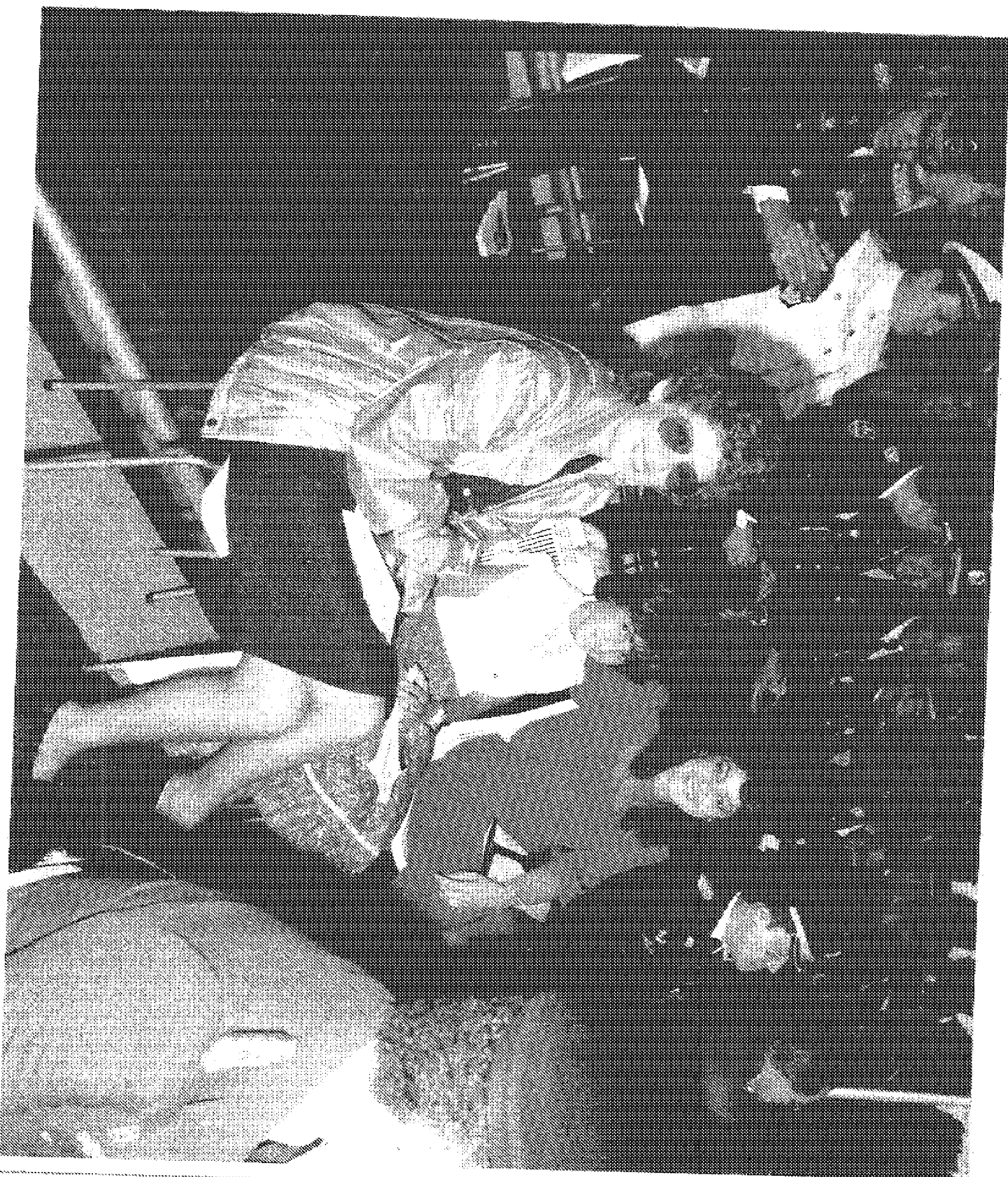


EXHIBIT D

SHOWS ([HTTP://WWW.TRAVELANDSCAPE.CA/SHOWS/](http://www.travelandscape.ca/shows/))

Search

5/20/13

SCHEDULE ([HTTP://WWW.TRAVELANDSCAPE.CA/SCHEDULE/](http://www.travelandscape.ca/schedule/))

ESCAPES ([HTTP://WWW.TRAVELANDSCAPE.CA/ESCAPES/](http://www.travelandscape.ca/escapes/))

EXPLORE ([HTTP://WWW.TRAVELANDSCAPE.CA/EXPLORE/](http://www.travelandscape.ca/explore/))

CONTESTS ([HTTP://WWW.TRAVELANDSCAPE.CA/CONTESTS/](http://www.travelandscape.ca/contests/))



TRAVEL + ESCAPES

([HTTP://WWW.TRAVELANDSCAPE.CA](http://www.travelandscape.ca))

MON
MAY 27

TUE
MAY 28

WED
MAY 29

THU
MAY 30

FRI
MAY 31

FULL WEEK
SCHEDULE

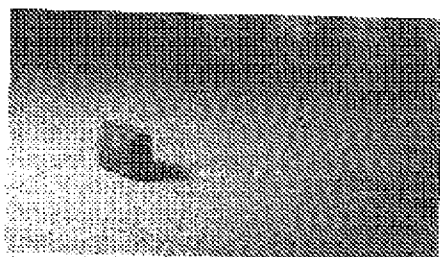
10 Countries Where You're Most Likely be Kidnapped for Ransom

Twitter (4)

Like (195)

414 RATINGS

12 March 2013



It's the number one form of monetary extortion in the world—and a reason to keep your wits about you when travelling in one of these destinations. Here are 10 countries where kidnappings occur most frequently.



([HTTP://WWW.TRAVELANDSCAPE.CA/AUTHOR/](http://www.travelandscape.ca/author/))

AARON BROERMAN

([HTTP://WWW.TRAVELANDSCAPE.CA/AUTHOR/AAROBROERMAN/](http://www.travelandscape.ca/author/aarobroerman/))

FOLLOW @SavvyTraveler @TravelLandscape

TAGS

Hot Travel News (<http://www.travelandscape.ca/blog/news/>)
Travel Safety (<http://www.travelandscape.ca/blog/safety/>)

Kidnapping is the number one form of monetary extortion around the world. It's used so often by criminals, guerrillas, separatists, rebels, terrorists and drug cartels as a means of funding and intimidation that it's practically an art form. There are even different regional styles. Below are 10 countries with reputations for being a kidnapping haven.

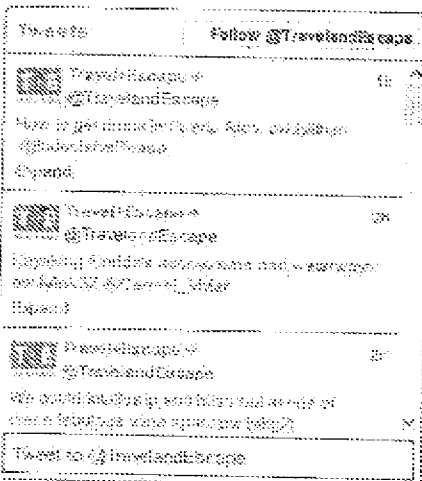
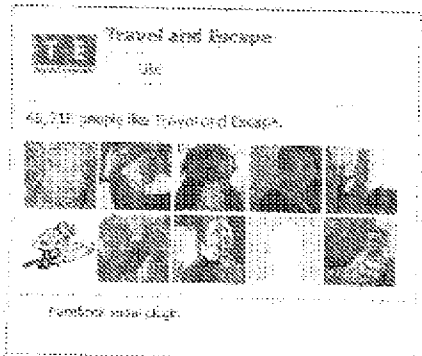
T+E TOP 5



ESCAPES

ARTICLES

1. [Dutch Kidnapper](#) [The Dutch Kidnapper](#)
2. [Mexican Kidnapper](#) [Mexican Kidnapper](#)
3. [Sudan Kidnapper](#) [Sudan Kidnapper](#)
4. [Somali Kidnapper](#) [Somali Kidnapper](#)
5. [New Zealand Kidnapper](#) [New Zealand Kidnapper](#)



1. Afghanistan

There's nothing quite like a war with al-Qaeda and the Taliban to put this country at the top of the kidnapping list. Combine that with the fact that much of the landscape is still lawless and no wonder this country reported 950 kidnappings for ransom per year. Now that the war is over, a power vacuum certainly exists and the place is still a haven for terrorists, arguably making it even more dangerous than when American forces first arrived.

2. Somalia

Though piracy has been driven to a three-year low thanks to ships hiring armed security and increased action from the world's navies, Somalia remains a high risk for kidnapping because of the abject poverty and a government not strong enough to stop crime. At least two people are taken in Somalia every month. Among those taken offshore, there are still more than 200 hostages in the region; just in January, a hostage was killed in a botched rescue attempt by French forces.

3. Iraq

American combat forces may have left Iraq, but the danger is still ever present. Though no official stats on kidnapping are collected, the country topped this list in 2007 with an estimated 1,500 kidnappings that year. Crisis-management assistance company Red 24 still places the country in the top three because of its combined political, terrorist and criminal groups all carrying out kidnappings for ransom. Not to mention the ever-present threat of civil war, which will only increase the likelihood of kidnappings should violence between Sunni and Shias resume to its 2007 level.

4. Nigeria

This country records more than 1,000 kidnappings for ransom a year. At the time of this writing, seven foreigners have been taken by armed militants from a construction company's camp after a guard was killed. [Editor's note: The seven hostages have since been reported as murdered.] Seven hostages makes this the biggest kidnapping yet in a country plagued by Islamic extremist groups. The one responsible for the latest kidnapping is called Ansaru; they are linked to al-Qaeda and were allegedly responsible for an attack on Nigerian troops traveling to Mali in 2012.

5. Pakistan

Official American ally Pakistan has been known to harbour terrorists, including Osama bin Laden, right under the nose of its military. They also harbour hostages—official statistics say there are more than 15,000 kidnappings in Pakistan a year, but the real number could be much higher due to underreporting. Perhaps more troubling is that between 10 and 20 percent of kidnappings are for ransom. Most of the others were killed during rescue and, in the case of Daniel Pearl and others, beheaded.

6. Yemen

Last December, when an Austrian man and a Finnish couple were kidnapped in broad daylight on one of the safest streets in the capital city of Sana'a, it highlighted just how lawless the city has become. Sana'a is nominally immune from the tribal instability that afflicts the rest of the country, but this year kidnappings, car-jackings and general crime is on the rise. In the country overall, more than 200 foreign nationals have been kidnapped over the past 20 years.

7. Venezuela

Venezuela has one of the highest rates of abduction per capita in the world—just asked Wilson Romo, the Venezuelan-born Washington Nationals catcher was kidnapped in his own country last year before being rescued. There were 1,000 kidnappings in just the first 10 months of 2013. The country runs "Express Kidnappings," in which a ransom is demanded that an individual or family can easily pay, on the spot. Sometimes you'll hear of "The Millionaire Walk," in which a traveler is trapped by a cab driver who picks up armed thugs before taking the passenger to a number of ATMs—making out their bank account with every stop.

8. Mexico

Thanks mostly to the failed War on Drugs, the Council for Law and Human Rights reports that there are about 72 kidnappings a day in Mexico, which puts the annual kidnap rate at 26,280 for the year. This is in direct contradiction to the statistics reported by the federal police, which put the kidnapping rate at 1,683 between January and September in 2012—a rate of 4.6 kidnappings per day. The council blames the abduction situation on corruption within the federal police. “The big problem we have in Mexico, in terms of security, is precisely the bodies that should provide security to citizens,” Fernando Ruiz, president of the Council for Law and Human Rights, told *The Latino Post*.

9. Haiti

Thankfully, kidnappings have gone down in Haiti since their peak between 2004 and 2006, but the director of the Institute for Justice and Democracy in Haiti reports that they are still “fairly frequent.” The U.S. Bureau of Diplomatic Security agrees, but also says incidents are less predictable and more widespread than they used to be. Montreal’s *La Presse* suggests that kidnappings have not exploded since the earthquake in 2010, but they do rise during the holiday season, thanks to the belief that families have more cash on-hand during that time to pay for gifts and school tuition.

10. Colombia

Incidents have dropped over the past 10 years, but kidnapping still remains an ever-present threat in Colombia. The country still has one of the highest numbers of kidnap victims in the world; in the last few years, kidnappings have started to rise again from the all-time low of 172 in 2009 to 258 in 2011. The rise has been attributed to kidnappings carried out by drug cartels such as Los Rastrojos, but guerrilla groups like the FARC, ELN and M-19 still play a prominent role.

AARON BROVERMAN



When Aaron Broverman isn't escaping into comic books, he's escaping to a new area code. Ever since he forged a path of independence by abandoning his hometown of Surrey, B.C. for the big city of Toronto in 2003, he's expanded his horizons even further with trips to Mexico, Israel and New York City, proving there are no limits to where you can go. His travel writing has appeared on the web at Walltope.ca and in print for *Avillies* and *New Mobility*, which are both lifestyle magazines for people with disabilities. The photo was taken in Tel Aviv on Aaron's 18th birthday trip to Israel in 2006.

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32 comments

4 30



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Monika Robinson · 7 months ago

Damn... every single one of those countries was on my "to tour before I die" list. How I have longed for the red clay of Yemen under my feet! The gentle urban sprawl that is Nigeria! The laughs with the semotraficantes at the roadblocks in Veracruz! The sultry prisons of Pakistan, where they'll jokingly beat you for a Swatch watch! And now all those dreams are dashed by this one article.

Hmm, maybe if I hurry I can still make Pakistan while the insurgents are still there.

Like · Reply · Share



alexey · 6 months ago · 1 comment

At least Mexico does not belong my "terrorist dream list". I was in Cancun recently, did not look like Pakistan to me.

Like · Reply · Share



Timothy · 6 months ago

I lived in Mexico on west coast for 35 years. Never had a problem, not even a tiny robbery. Much safer and felt safer than Canada or the US. More shooting in my small city in Ca in the past year than we had in our town there in 10.

Like · Reply · Share



Timothy · 6 months ago

Mexico, Israel AND New York City? You sir, are as cosmopolitan as they come.

Like · Reply · Share



crystalline · 6 months ago · 1 comment

I don't think you'll find any of those countries on my list. I've been to all of them.



Five and 10 million square kilometers of safe Canada to play in. And when I get tired of Canada... there's almost another 10 mil sq kilometers right under me of relatively safe fun in the U.S.

1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 26



If you think the US is safe... Most gun murders...

Yes... but I'd have a gun as well... 101



You are clearly....stunned.



I'm actually a better shot stored. lol



I agree with your earlier comments but if you do anything better stored but destroying a giant sized bag of M&M's you've got to get some better stuff.

Sigh.... not true. Many places have vastly higher gun murder rates especially Mexico. And of the two groups in the U.S. that commit the most gun murders, guess where one group comes from? And no to the author of the article implying Mexico gun violence is somehow the fault of the U.S., that country has been problematic even in it's origins (not the good Father Hidalgo). A country is a testimony to the thoughts of it's people, we in Canada seem to relish pre-programmed Pierre-Thomas-Leslie ignorance about the U.S..

☐ Russia is not on the list



Not the southern Philippines.

play date is not good at all go out show your child!

or Columbian crops....Yemeni yalves..... Pakistani prices

10000. I had just more room to 'dispose' info.

Don't make me laugh HARDER

40000. If I can afford to go to Australia, why would I even consider going to Mexico in the first place?

10 | 100 | 200 | 300 | 400 | 500 | 600 | 700 | 800 | 900 | 1000



anytime - 4 years ago

Where's Philippines?

1 | 100 | 200 | 300 | 400 | 500 | 600 | 700 | 800 | 900 | 1000

ALWAYS DRIVING MESSAGE

Where's the?

Dead Man Falls from Sky | Travel and Escape

10/10/2013 10:00 AM

Dead Man Falls from Sky — Yet hiked Soda pop through a straw YOU on the other hand blow good beers for small coin.

Where To Get Your Drink On In Carlsbad (Edit)

10/10/2013 10:00 AM

Carlsbad — advertising paid for this. I'm with sure... why not just come to our wonderful and very cool City & ask the nice ...

Solo on a London MINI Tour | Travel and Escape

10/10/2013 10:00 AM

Solo on a London MINI Tour — That sounds like fun, though solo. I do love walking around London. Something different, and especially if ...

5 Adrenaline Adventures In Chile (Edit)

10/10/2013 10:00 AM

Adrenaline — It's also nice to skydive at Matipilla, in Chile. The view is amazing. Pacific ocean by World, and Arica by ...

10/10/2013 10:00 AM

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List of countries by intentional homicide rate

From Wikipedia, the free encyclopedia

See also: List of countries by intentional homicide rate by decade

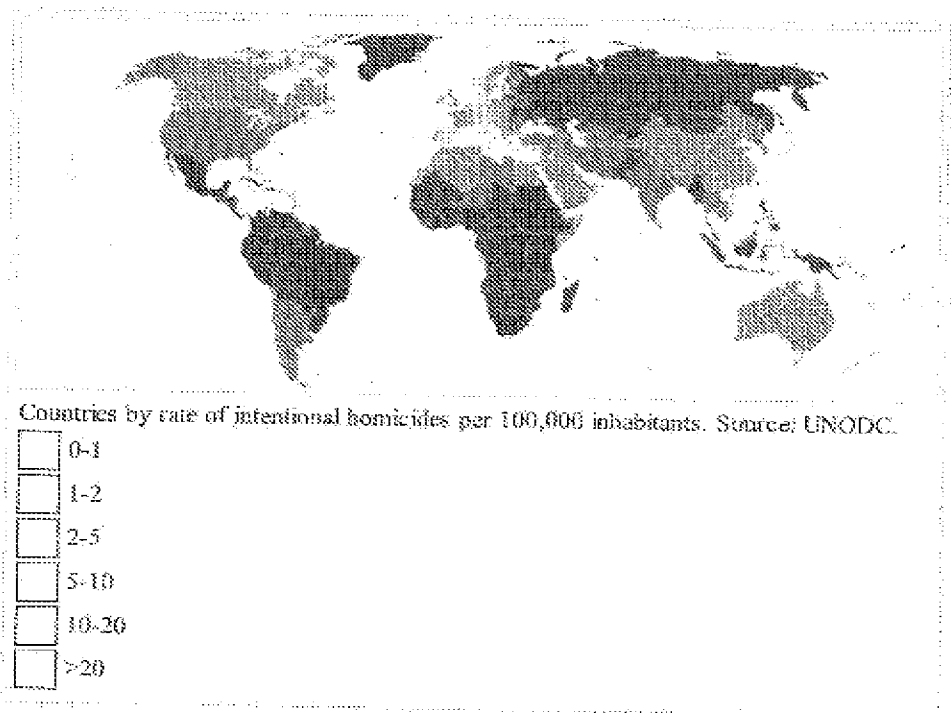
List of countries by intentional homicide rate per year per 100,000 inhabitants. The reliability of underlying national murder rate data may vary.^[1] The legal definition of "intentional homicide" differs among countries. Intentional homicide may or may not include infanticide, assisted suicide or euthanasia.^[2]

Intentional homicide demographics are affected by changes in trauma care, leading to changed lethality of violent assaults, so the intentional homicide rate may not necessarily indicate the overall level of societal violence.^[3] They may also be underreported for political reasons.^{[4][5]} Another problem for the comparability of the following figures is that some data may include attempts. In general the values in these lists should not include attempts except when mentioned otherwise.

A study undertaken by the Geneva Declaration on Armed Violence and Development estimated that there were approximately 490,000 intentional homicides in 2004. The study estimated that the global rate was 7.6 intentional homicides per 100,000 inhabitants for 2004.^[6] For the year 2010 UNODC (United Nations Office on Drugs and Crime) made a similar study. It presumed a number of 468,000 intentional homicides for this year. That would correspond to a worldwide rate of 6.9.^[7]

Contents

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UNODC's global study

The UNODC made a study in 2012 that includes most countries of the world. The following lists show only the most recent data. Rates are calculated per 100,000 inhabitants. Intentional homicide in this case is defined as unlawful death purposefully inflicted on a person by another person.^[8]

By region

UNODC murder rates most recent year		
Region	Rate	Count
Africa	13.0	169,105
Americas	13.4	144,595
Asia	5.1	127,120
Europe	3.5	24,025
Oceania	0.8	1,180
World	6.9	466,078

By subregion

UNODC murder rates most recent year			
Subregion	Rate	Count	Region
Eastern Africa	27.2	69,344	Africa
Middle Africa	20.8	25,330	Africa
Northern Africa	5.8	12,276	Africa
Southern Africa	33.5	17,484	Africa
Western Africa	15.4	44,671	Africa
Caribbean	16.9	7,001	Americas
Central America	28.3	44,997	Americas
Northern America	7.9	13,558	Americas
South America	20.0	79,039	Americas
Central Asia	6.1	3,667	Asia
Eastern Asia	1.3	19,828	Asia
South-Eastern Asia	6.0	34,787	Asia
Southern Asia	13.8	63,102	Asia
Western Asia	1.0	5,736	Asia
Eastern Europe	6.1	19,072	Europe
Northern Europe	1.5	1,432	Europe
Southern Europe	1.4	1,669	Europe
Western Europe	1.0	1,852	Europe
Australasia	1.0	268	Oceania
Melanesia	11.7	898	Oceania
Micronesia	2.3	10	Oceania
Polynesia	0.1	3	Oceania



































By country

UNODC murder rates most recent year (full table here (http://www.unodc.org/documents/data-and-analysis/statistics/crime/Homicide_statistics2012.xls))

Country	Rate	Count	Region	Subregion
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en.wikipedia.org/wiki/List_of_countries_by_intentional_homicide_rate

 Burundi	23.2	1,726	Africa	Eastern Africa
 Comoros	12.2	85	Africa	Eastern Africa
 Djibouti	7.4	29	Africa	Eastern Africa
 Eritrea	17.8	879	Africa	Eastern Africa
 Ethiopia	25.5	20,239	Africa	Eastern Africa
 Kenya	20.1	7,733	Africa	Eastern Africa
 Madagascar	8.1	1,588	Africa	Eastern Africa
 Malawi	39.0	5,039	Africa	Eastern Africa
 Mauritius	2.3	33	Africa	Eastern Africa
 Mozambique	8.2	1,925	Africa	Eastern Africa
 Rwanda	17.1	1,708	Africa	Eastern Africa
 Seychelles	3.5	7	Africa	Eastern Africa
 Somalia	1.5	138+	Africa	Eastern Africa
 Uganda	36.3	11,373	Africa	Eastern Africa
 Tanzania	24.5	10,357	Africa	Eastern Africa
 Zambia	38.0	4,710	Africa	Eastern Africa
 Zimbabwe	14.7	1,775	Africa	Eastern Africa
 Angola	19.0	3,426	Africa	Middle Africa
 Cameroon	19.2	3,700	Africa	Middle Africa
 Central African Republic	19.3	1,240	Africa	Middle Africa
 Chad	15.3	1,686	Africa	Middle Africa
 Congo	39.8	1,180	Africa	Middle Africa
 Democratic Republic of the Congo	21.7	13,558	Africa	Middle Africa
 Equatorial Guinea	20.7	137	Africa	Middle Africa
 São Tomé and Príncipe	1.9	3	Africa	Middle Africa
 Gabon	3.33	200	Africa	Middle Africa
 Algeria	1.5	516	Africa	Northern Africa
 Egypt	1.2	992	Africa	Northern Africa
 Libya	0.9	176+	Africa	Northern Africa
 Morocco	1.4	447	Africa	Northern Africa
 Sudan	24.2	10,028++	Africa	Northern Africa
 Tunisia	1.1	117	Africa	Northern Africa
 Botswana	14.5	287	Africa	Southern Africa
 Lesotho	39.2	764	Africa	Southern Africa
 Namibia	17.2	352	Africa	Southern Africa
 South Africa	31.8	15,940	Africa	Southern Africa
 Swaziland	12.9	141	Africa	Southern Africa
 Benin	18.1	1,262	Africa	Western Africa
 Burkina Faso	18.0	2,876	Africa	Western Africa

 Cape Verde	11.6	56	Africa	Western Africa
 Ivory Coast	56.9	10,801	Africa	Western Africa
 Gambia	10.8	106	Africa	Western Africa
 Ghana	13.7	3,646	Africa	Western Africa
 Guinea	42.5	2,152	Africa	Western Africa
 Guinea-Bissau	26.0	294	Africa	Western Africa
 Liberia	10.1	371	Africa	Western Africa
 Mali	8.5	1,157	Africa	Western Africa
 Mauritania	14.2	485	Africa	Western Africa
 Niger	5.8	552	Africa	Western Africa
 Nigeria	13.2	18,422	Africa	Western Africa
 Senegal	8.7	1,027	Africa	Western Africa
 Sierra Leone	11.9	837	Africa	Western Africa
 Togo	10.9	627	Africa	Western Africa
 Anguilla	18.8	1	Americas	Caribbean
 Antigua and Barbuda	6.0	6	Americas	Caribbean
 Bahamas	17.4	94	Americas	Caribbean
 Barbados	11.0	31	Americas	Caribbean
 British Virgin Islands	8.6	2	Americas	Caribbean
 Cayman Islands	8.4	5	Americas	Caribbean
 Cuba	8.0	563	Americas	Caribbean
 Dominica	22.1	15	Americas	Caribbean
 Dominican Republic	29.0	2,513	Americas	Caribbean
 Grenada	12.5	12	Americas	Caribbean
 Guadeloupe	7.5	32	Americas	Caribbean
 Haiti	6.7	689	Americas	Caribbean
 Jamaica	45.0	1,125	Americas	Caribbean
 Martinique	8.5	17	Americas	Caribbean
 Montserrat	19.7	1	Americas	Caribbean
 Puerto Rico	26.2	983	Americas	Caribbean
 Saint Kitts and Nevis	39.1	20	Americas	Caribbean
 Saint Lucia	25.7	44	Americas	Caribbean
 Saint Vincent and the Grenadines	21.0	25	Americas	Caribbean
 Trinidad and Tobago	28.2	472	Americas	Caribbean
 Turks and Caicos Islands	8.7	3	Americas	Caribbean
 U.S. Virgin Islands	29.2	43	Americas	Caribbean
 Belize	41.4	129	Americas	Central America
 Costa Rica	20.0	474	Americas	Central America
 El Salvador	29.2	4,308	Americas	Central America

 Guatemala	58.1	5,681	Americas	Central America
 Honduras	71.6	7,104	Americas	Central America
 Mexico	21.7	27,199+	Americas	Northern America
 Nicaragua	12.0	738	Americas	Central America
 Panama	21.9	759	Americas	Central America
 Bermuda	12.3	8	Americas	Northern America
 Canada	1.6	554	Americas	Northern America
 United States	4.8	14,748	Americas	Northern America
 Argentina	3.4	1,360	Americas	South America
 Bolivia	4.9	884	Americas	South America
 Brazil	21.0	40,974	Americas	South America
 Chile	3.7	639	Americas	South America
 Colombia	33.4	14,746+	Americas	South America
 Ecuador	33.2	2,638	Americas	South America
 French Guiana	13.3	30	Americas	South America
 Guyana	18.6	140	Americas	South America
 Paraguay	11.5	741	Americas	South America
 Peru	30.3	2,969	Americas	South America
 Suriname	4.6	24	Americas	South America
 Uruguay	2.9	199	Americas	South America
 Venezuela	45.1	13,880	Americas	South America
 Kazakhstan	4.5	1,418	Asia	Central Asia
 Kyrgyzstan	20.1	1,072	Asia	Central Asia
 Tajikistan	2.1	143	Asia	Central Asia
 Turkmenistan	4.2	203	Asia	Central Asia
 Uzbekistan	3.1	831	Asia	Central Asia
 China	1.0	13,410	Asia	Eastern Asia
 Taiwan	3.2	743	Asia	Eastern Asia
 North Korea	13.2	3,658	Asia	Eastern Asia
 Hong Kong	0.2	17	Asia	Eastern Asia
 Japan	0.4	506	Asia	Eastern Asia
 Macau	0.7	4	Asia	Eastern Asia
 Mongolia	8.7	239	Asia	Eastern Asia
 South Korea ^{[note 1][note 2]}	2.6	1,251	Asia	Eastern Asia
 Brunei	0.5	2	Asia	South-Eastern Asia
 Cambodia	3.0	448	Asia	South-Eastern Asia
 Indonesia	8.3	18,963	Asia	South-Eastern Asia
 Laos	4.0	279	Asia	South-Eastern Asia
 Malaysia	3.3	604	Asia	South-Eastern Asia

 Myanmar	10.2	4,800	Asia	South-Eastern Asia
 Philippines	5.4	4,947	Asia	South-Eastern Asia
 Singapore	0.3	16	Asia	South-Eastern Asia
 Thailand	4.8	3,307	Asia	South-Eastern Asia
 Timor-Leste	0.9	75	Asia	South-Eastern Asia
 Vietnam	1.6	1,346	Asia	South-Eastern Asia
 Afghanistan	3.4	712+	Asia	Southern Asia
 Bangladesh	2.7	3,988	Asia	Southern Asia
 Bhutan	1.0	7	Asia	Southern Asia
 India	4.5	42,923+	Asia	Southern Asia
 Iran	2.0	2,215	Asia	Southern Asia
 Maldives	1.6	5	Asia	Southern Asia
 Nepal	3.3	818	Asia	Southern Asia
 Pakistan	7.3	13,860+	Asia	Southern Asia
 Sri Lanka	3.0	745	Asia	Southern Asia
 Armenia	1.4	44	Asia	Western Asia
 Azerbaijan	2.2	206	Asia	Western Asia
 Bahrain	0.6	6	Asia	Western Asia
 Cyprus	1.7	19	Asia	Western Asia
 Iraq	3.5	608+	Asia	Western Asia
 Israel	2.1	159+	Asia	Western Asia
 Jordan	1.8	100	Asia	Western Asia
 Kuwait	2.2	59	Asia	Western Asia
 Lebanon	2.2	95	Asia	Western Asia
 Palestine	4.1	145+	Asia	Western Asia
 Oman	0.7	18	Asia	Western Asia
 Qatar	0.9	13	Asia	Western Asia
 Saudi Arabia	1.0	265+	Asia	Western Asia
 Syria	2.3	463+	Asia	Western Asia
 Turkey	3.3	2,320	Asia	Western Asia
 United Arab Emirates	0.8	39	Asia	Western Asia
 Yemen	3.2	990+	Asia	Western Asia
 Belarus	4.0	473	Europe	Eastern Europe
 Bulgaria	2.0	147	Europe	Eastern Europe
 Czech Republic	1.7	181	Europe	Eastern Europe
 Georgia	2.2	187	Europe	Eastern Europe
 Hungary	1.3	133	Europe	Eastern Europe
 Poland	1.1	436	Europe	Eastern Europe
 Moldova	2.3	267	Europe	Eastern Europe

 Romania	2.0	421	Europe	Eastern Europe
 Russia	10.2	14,574	Europe	Eastern Europe
 Slovakia	1.5	84	Europe	Eastern Europe
 Ukraine	5.2	2,356	Europe	Eastern Europe
 Denmark	0.9	47	Europe	Northern Europe
 Estonia	0.2	70	Europe	Northern Europe
 Finland	2.2	118	Europe	Northern Europe
 Greenland	1.9	11	Europe	Northern Europe
 Iceland	0.3	1	Europe	Northern Europe
 Ireland	1.2	54	Europe	Northern Europe
 Latvia	0.3	70	Europe	Northern Europe
 Lithuania	4.6	219	Europe	Northern Europe
 Norway	0.6	29	Europe	Northern Europe
 Sweden	1.0	91	Europe	Northern Europe
 United Kingdom	1.2	722	Europe	Northern Europe
 Albania	4.0	127	Europe	Southern Europe
 Andorra	1.3	1	Europe	Southern Europe
 Bosnia and Herzegovina	1.5	56	Europe	Southern Europe
 Croatia	1.4	62	Europe	Southern Europe
 Greece	1.5	176	Europe	Southern Europe
 Italy	0.9	529	Europe	Southern Europe
 Malta	1.0	4	Europe	Southern Europe
 Montenegro	3.3	22	Europe	Southern Europe
 Portugal	1.2	124	Europe	Southern Europe
 Serbia	1.2	123	Europe	Southern Europe
 Slovenia	0.7	15	Europe	Southern Europe
 Spain	0.8	390	Europe	Southern Europe
 Macedonia	1.9	40	Europe	Southern Europe
 Austria	0.6	56	Europe	Western Europe
 Belgium	1.7	180	Europe	Western Europe
 France	1.1	682	Europe	Western Europe
 Germany	0.8	690	Europe	Western Europe
 Liechtenstein	2.3	1	Europe	Western Europe
 Luxembourg	0.4	12	Europe	Western Europe
 Monaco	0.0	0	Europe	Western Europe
 Netherlands	1.1	179	Europe	Western Europe
 Switzerland	0.7	52	Europe	Western Europe
 Australia	1.0	229	Oceania	Australasia
 New Zealand	0.9	39	Oceania	Australasia















 Fiji	2.3	23	Oceania	Melanesia
 Papua New Guinea	11.0	854	Oceania	Melanesia
 Solomon Islands	3.7	19	Oceania	Melanesia
 Vanuatu	0.9	2	Oceania	Melanesia
 Guam	0.6	1	Oceania	Micronesia
 Kiribati	1.3	7	Oceania	Micronesia
 Federated States of Micronesia	0.9	1	Oceania	Micronesia
 Nauru	0.8	1	Oceania	Micronesia
 Palau	0.0	0	Oceania	Micronesia
 French Polynesia	0.4	1	Oceania	Polynesia
 Samoa	1.1	2	Oceania	Polynesia
 Tonga	1.0	1	Oceania	Polynesia

Country subdivisions

Australia

 Australia	Sources	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
 Northern Territory	[9][10][11]	1.4	1.2	1.1	1.0	1.4	1.0	1.1	1.2	1.4	1.0
 Tasmania	[9][10][11]	1.7	1.3	0.4	0.6	0.9	0.6	1.4	0.9	1.0	0.8
 New South Wales	[9][10][11]	1.8	1.7	2.1	1.8	1.7	2.4	1.6	1.3	1.4	1.6
 Western Australia	[9][10][11]	1.5	1.4	1.6	1.2	1.5	1.6	1.3	1.1	1.4	1.6
 Queensland	[9][10][11]	1.9	2.3	1.3	1.6	1.4	1.5	1.3	1.3	1.2	1.2
 Australian Capital Territory	[9][10][11]	0.0	0.6	0.9	0.9	0.6	0.4	1.2	0.9	0.9	1.1
 Victoria	[9][10][11]	1.8	1.7	1.6	2.3	1.4	1.7	2.4	2.1	1.1	1.4
 South Australia	[9][10][11]	1.2	0.4	0.7	1.0	0.9	0.7	0.8	1.1	0.8	1.0

Canada

 Canada	Sources	2004	2005	2006	2007	2008	2009	2010	2011
 Nunavut	[12]	11.40	6.59	6.49	31.38	12.66	15.54	15.06	21.91
 Northwest Territories	[12]	9.34	0.00	0.00	4.35	6.87	4.58	6.29	6.87
 Manitoba	[12]	6.26	4.78	3.27	5.13	4.48	4.57	3.64	4.24
 Saskatchewan	[12]	3.91	4.49	4.73	3.40	2.86	1.59	3.25	3.95
 Alberta	[12]	2.63	3.78	2.78	2.51	5.06	2.89	2.97	2.89
 Nova Scotia	[12]	1.49	2.13	1.71	1.39	1.28	1.60	2.10	2.33
 British Columbia	[12]	2.70	2.41	2.55	2.14	1.67	1.69	1.83	1.90
 Quebec	[12]	1.47	1.32	1.22	1.17	1.19	1.12	1.06	1.32
 Ontario	[12]	1.51	1.75	1.55	1.58	1.36	1.36	1.43	1.20
 New Brunswick	[12]	0.93	1.20	0.94	1.08	0.40	1.60	1.20	1.06
 Newfoundland and Labrador	[12]	0.39	2.1	1.37	0.59	0.98	0.20	0.78	0.78
 Prince Edward Island	[12]	0.00	0.00	0.73	0.00	1.43	0.00	0.00	0.69
 Yukon	[12]	13.27	5.17	0.00	6.19	9.20	3.64	2.90	0.00


























Mexico

 Mexico	Sources	2009	2010
 Chihuahua	[13][14]	34	33
 Durango	[13][14]	40	46
 Sinaloa	[13][14]	47	55
 Guerrero	[13][14]	46	48
 Baja California	[13][14]	34	31
 Oaxaca	[13][14]	21	14
 Sonora	[13][14]	22	26
 Morelos	[13][14]	19	23
 Michoacán	[13][14]	14	16
 Nayarit	[13][14]	15	25
 Quintana Roo	[13][14]	13	17
 Chiapas	[13][14]	16	11
 Coahuila	[13][14]	9	15
 México	[13][14]	1	3
 Tamaulipas	[13][14]	2	22
 Colima	[13][14]	4	14
 Federal District	[13][14]	2	4
 Guanajuato	[13][14]	3	6
 Jalisco	[13][14]	3	12
 Puebla	[13][14]	7	7
 San Luis Potosí	[13][14]	6	12
 Nuevo León	[13][14]	6	18
 Aguascalientes	[13][14]	3	6
 Tabasco	[13][14]	6	7
 Hidalgo	[13][14]	5.7	6
 Baja California Sur	[13][14]	7	8
 Querétaro	[13][14]	5	5
 Campeche	[13][14]	5	7
 Veracruz	[13][14]	5	5
 Tlaxcala	[13][14]	4	4
 Yucatán	[13][14]	2	2



























United States

 United States	Sources	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Last

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 District of Columbia	[15]	41.9	40.3	35.4	34.7	33.7	32.5	29.1	29.8	21.5	21.0	24.0
 Puerto Rico	[16]	38.2	39.1	30.2	20.1	20.5	19.71	18.4	15.52	20.31	22.81	22.61
 Louisiana	[15]	12.5	11.2	13.1	13.0	12.1	10.0	12.1	14.7	13.2	11.8	11.2
 New Mexico	[15]	7.3	5.4	7.2	6.2	8.6	7.5	7.1	9.3	7.5	8.7	8.7
 Maryland	[15]	3.1	3.3	0.4	0.3	0.4	1.0	0.7	2.9	6.7	7.7	7.7
 Tennessee	[15]	7.3	7.4	3.5	6.8	2.4	7.2	7.0	5.6	6.2	7.3	7.3
 Alabama	[15]	7.6	6.5	6.8	8.6	5.5	3.2	3.0	7.2	7.6	6.9	5.9
 Mississippi	[15]	9.0	9.9	9.2	9.3	7.8	7.8	9.0	7.0	8.0	6.4	6.4
 Missouri	[15]	6.0	5.6	6.8	2.1	6.1	6.9	6.1	6.2	7.7	6.4	6.4
 Michigan	[15]	6.7	6.7	6.8	6.1	6.4	6.2	7.2	6.6	5.3	5.3	6.3
 South Carolina	[15]	7.3	8.1	7.3	7.3	6.6	7.4	5.4	2.5	6.4	6.3	6.3
 Arkansas	[15]	6.9	5.5	5.2	6.6	6.4	5.6	7.5	7.1	5.2	3.2	6.2
 Oklahoma	[15]	5.5	5.1	4.7	3.9	5.3	5.3	5.6	5.2	6.0	6.2	6.2
 Illinois	[15]	7.2	7.8	7.6	7.1	6.3	6.8	6.4	5.9	6.2	5.6	6.0
 Nevada	[15]	3.2	3.6	3.6	3.2	7.4	3.5	3.1	7.3	6.5	5.9	3.9
 Georgia	[15]	6.0	7.1	7.1	7.6	6.9	6.2	6.6	2.7	6.7	5.5	6.8
 Florida	[15]	8.0	5.7	5.5	5.3	3.4	5.9	6.2	6.4	6.3	5.3	5.5
 Arizona	[15]	7.6	7.5	7.1	7.9	7.2	7.5	4.5	5.7	7.0	6.4	5.4
 Texas	[15]	3.9	6.2	5.0	6.4	6.1	6.1	5.9	5.8	7.0	5.4	5.4
 California	[15]	6.1	6.4	6.8	6.5	6.7	6.9	6.2	6.2	6.9	5.0	7.3
 North Carolina	[15]	7.0	6.3	6.8	6.5	6.2	6.7	6.1	6.5	6.7	5.5	5.2
 Pennsylvania	[15]	6.8	5.3	5.1	5.2	5.2	6.3	6.0	5.8	5.6	5.2	5.2
 Indiana	[15]	6.8	6.7	5.9	5.5	5.3	5.7	5.7	5.6	5.0	4.8	6.6
 Delaware	[15]	3.2	4.9	3.2	2.6	3.4	4.4	4.9	4.8	6.3	4.6	4.0
 West Virginia	[15]	2.5	3.2	3.2	4.0	3.3	4.5	4.5	3.0	3.7	4.5	4.0
Ohio	[15]	5.7	4.0	4.6	4.5	3.1	3.7	4.7	4.6	4.8	4.3	4.5
Virginia	[15]	9.7	5.1	5.7	5.6	3.2	6.1	5.3	5.4	6.1	1.6	6.1

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 Kansas	[15]	6.3	3.4	2.3	4.6	4.5	1.7	4.6	3.9	4.6	4.2	4.2
 Kentucky	[15]	4.8	4.7	4.1	4.4	5.0	4.6	4.2	5.3	4.7	4.1	4.1
 New York	[15]	6.9	7.0	4.8	4.9	6.6	4.5	4.8	4.2	4.3	4.0	4.0
 New Jersey	[15]	3.4	3.9	4.0	4.3	4.3	4.8	4.9	4.4	4.3	3.7	3.3
 Colorado	[15]	6.1	3.6	4.0	4.1	3.4	3.7	3.6	3.2	3.2	3.5	3.3
 Alaska	[15]	4.3	4.2	2.1	4.0	3.6	4.9	3.4	4.4	3.9	3.1	3.1
 Connecticut	[15]	2.9	3.1	2.1	3.2	2.6	3.0	3.9	2.2	3.8	3.0	3.0
 Montana	[15]	2.2	1.8	1.8	3.3	3.2	1.9	3.6	2.4	3.4	2.9	2.8
 Rhode Island	[15]	4.5	2.7	3.8	2.5	3.4	3.3	2.5	1.8	2.8	2.9	2.9
 Washington	[15]	3.3	3.0	3.0	3.8	3.1	3.3	3.1	3.2	2.9	2.7	2.7
 Massachusetts	[15]	2.0	2.3	3.7	3.2	3.2	2.8	2.9	3.9	2.6	2.6	2.6
 South Dakota	[15]	0.9	0.9	1.4	1.3	2.3	2.3	3.2	3.9	4.0	2.6	2.8
 Wisconsin	[15]	3.3	3.6	2.6	3.3	3.2	3.7	3.0	3.5	2.6	2.8	2.4
 Wyoming	[15]	2.4	1.8	3.0	2.8	2.1	3.8	2.8	4.0	2.3	2.6	2.4
 Nebraska	[15]	2.7	2.5	1.8	3.2	3.3	3.6	3.0	3.9	3.9	2.1	2.2
 Oregon	[15]	2.0	2.4	2.0	1.9	2.6	3.0	1.4	2.0	2.1	2.1	2.7
 Maine	[15]	1.2	1.5	1.1	1.2	1.4	1.4	1.7	1.5	2.3	2.0	2.0
 Hawaii	[15]	2.9	2.4	1.9	1.8	2.6	1.9	1.6	1.9	2.0	1.7	1.7
 North Dakota	[15]	0.6	1.1	0.8	1.4	1.3	1.9	1.3	2.0	0.8	1.5	1.5
 Idaho	[15]	1.2	2.3	2.3	1.9	3.2	2.4	2.2	1.3	1.5	1.4	1.4
 Minnesota	[15]	3.1	2.4	2.2	2.9	2.3	3.3	2.5	3.2	3.0	1.4	1.4
 Utah	[15]	1.9	2.9	2.0	3.4	1.9	2.0	2.0	3.2	1.5	1.3	1.3
 Iowa	[15]	1.6	1.7	1.5	1.7	1.5	1.3	1.9	1.3	2.0	1.1	1.1
 Vermont	[15]	1.5	1.1	2.1	2.4	2.6	1.3	2.2	2.1	1.7	1.1	1.1
 New Hampshire	[15]	1.8	1.3	0.9	1.3	1.3	1.5	1.0	0.9	1.1	0.8	0.8
 Guam	[17]				4.9	5.4	4.2	6.4	0.6			0.6

- * List of Brazilian states by murder rate
- * List of Russian federal subjects by murder rate
- * Crime in South Africa#Murder (includes a table with the homicide rates from April 1994 to March 2011)

See also

- List of countries by firearm-related death rate
- List of countries by intentional homicide rate by decade
- List of metropolitan areas by intentional homicide
- List of countries by intentional death rate
- List of countries by suicide rate
- List of countries by life expectancy

Criminology:

- Correlates of crime

Notes

- ↑ Statistics includes attempted murder, aiding and abetting of murder, murder conspiracy and others. "Footnote #1 of 09 5대범죄 발생, 검거 현황 (Status for occurrence and arrest of 5 major crimes) by Korea National Police Agency." (<http://police.go.kr/portal/main/contents.do?menuNo=200192>).
- ↑ The number of actual deaths by those crimes is only 184. "5 피해정도" chapter of "2011 살인(37-44)" statistics by Supreme Prosecutors' Office Republic of Korea." ([http://www.spo.go.kr/_custom/res_download.jsp?_site=spo&_type=etc&file_name=2011_%EC%82%B4%EC%9D%B8\(37-44\).pdf](http://www.spo.go.kr/_custom/res_download.jsp?_site=spo&_type=etc&file_name=2011_%EC%82%B4%EC%9D%B8(37-44).pdf)). That is equivalent to 0.38 deaths per 100,000 inhabitants.

References

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- ↑ Harris, Anthony R.; Stephen H. Thomas; Gene A. Fisher; David J. Hirsch (05 2002). "Murder and medicine: the lethality of criminal assault 1960-1999" (<http://hxx.sagepub.com/cgi/content/abstract/6/2/128>) (fee required). *Homicide studies* 6 (2): 128–166. doi:10.1177/1088767902006002003 (<http://dx.doi.org/10.1177/1088767902006002003>). Retrieved 2006-12-08.
- ↑ Harris, Anthony R.; Stephen H. Thomas; Gene A. Fisher; David J. Hirsch (05 2002). "Murder and medicine: the lethality of criminal assault 1960-1999" (<http://hxx.sagepub.com/cgi/content/abstract/6/2/128>) (fee required). *Homicide studies* 6 (2): 128–166. doi:10.1177/1088767902006002003 (<http://dx.doi.org/10.1177/1088767902006002003>). Retrieved 2006-12-08.
- ↑ Fry, Don. *Believing the news* ISBN 0-935742-11-5, ISBN 978-0-935742-11-4
- ↑ Vizzari, William J. *Shots in the dark* ISBN 0-8476-9560-3, ISBN 978-0-8476-9560-7
- ↑ "Global Burden of Armed Violence Report" (<http://www.genevadeclaration.org/fileadmin/docs/Global-Burden-of-Armed-Violence-full-report.pdf>). Geneva Declaration on Armed Violence and Development.
- ↑ "Global Study on Homicide" (http://www.unodc.org/documents/data-and-analysis/statistics/Homicide/Globa_study_on_homicide_2011_web.pdf). UNODC.
- ↑ "Homicide Statistics 2012" (http://www.unodc.org/documents/data-and-analysis/statistics/crime/Homicide_statistics2012.xls). UNODC.
- ↑ *^ a b c d e f g h* Dearden, Jack; Jones, Warwick (pdf). Homicide in Australia: 2006-07 National Homicide Monitoring Program annual report (<http://www.aic.gov.au/documents/0/B/6/%7B0B619F44-B18B-47B4-9B59-F87BA643CBAA%7Dfacts11.pdf>) (Report). Canberra: Australian Institute of Criminology. p. 113. <http://www.aic.gov.au/documents/0/B/6/%7B0B619F44-B18B-47B4-9B59-F87BA643CBAA%7Dfacts11.pdf>.
- ↑ *^ a b c d e f g h* Homicide Statistics: 2011 Australian Government report (Report). Canberra: Australian Institute of Criminology.
- ↑ *^ a b c d e f g h* (pdf) Recorded Crime-Victims ([http://www.ausstats.abs.gov.au/Ausstats/subscriber.nsf/0/990A014955F3818DCA2577360017E331/\\$File/45100_2009.pdf](http://www.ausstats.abs.gov.au/Ausstats/subscriber.nsf/0/990A014955F3818DCA2577360017E331/$File/45100_2009.pdf)) (Report). Canberra: Australian Bureau of Statistics. [http://www.ausstats.abs.gov.au/Ausstats/subscriber.nsf/0/990A014955F3818DCA2577360017E331/\\$File/45100_2009.pdf](http://www.ausstats.abs.gov.au/Ausstats/subscriber.nsf/0/990A014955F3818DCA2577360017E331/$File/45100_2009.pdf).

12. *^* *a* *b* *c* *d* *e* *f* *g* *h* *i* *j* *k* *l* *m* "Canada Summary Tables" (<http://www.statcan.gc.ca/tables-tableaux/sum-som/l01/cst01/legal12b-eng.htm>). Statistics Canada.
13. *a* *b* *c* *d* *e* *f* *g* *h* *i* *j* *k* *l* *m* *n* *o* *p* *q* *r* *s* *t* *u* *v* *w* *x* *y* *z* *aa* *ab* *ac* *ad* *ae* "Mexican Crime Stats 2010" (<http://www.prominix.com/sblock/admin/images/Mexico%20Crime%20Stats%202010.pdf>). RRS y Asociados, S.C.
14. *a* *b* *c* *d* *e* *f* *g* *h* *i* *j* *k* *l* *m* *n* *o* *p* *q* *r* *s* *t* *u* *v* *w* *x* *y* *z* *aa* *ab* *ac* *ad* *ae* "Mexican Crime Stats 2011" (<http://www.prominix.com/sblock/admin/images/Mexico%20Crime%20Stats%202011.pdf>). RRS y Asociados, S.C.
15. *a* *b* *c* *d* *e* *f* *g* *h* *i* *j* *k* *l* *m* *n* *o* *p* *q* *r* *s* *t* *u* *v* *w* *x* *y* *z* *aa* *ab* *ac* *ad* *ae* *af* *ag* *ah* *ai* *aj* *ak* *al* *am* *an* *ao* *ap* *aq* *ar* *as* *at* *au* *av* *aw* *ax* *ay* "State-by-state and National Crime Estimates by Year(s)" ([http://www.ucrdataool.gov/Search/Crime/State/StatebyState.cfm](http://www.ucrdatatool.gov/Search/Crime/State/StatebyState.cfm)). Federal Bureau of Investigation.
16. *^* "Puerto Rico Homicide Rates" (http://tendenciaspr.uprrp.edu/Violencia/Asesinatos/tasas_pr_62-2009.htm). Universidad de Puerto Rico.
17. *^* "Homicide Trends 2003-2008" (http://www.unodc.org/documents/data-and-analysis/Crimp-statistics/Pivot_by_Country.20100201.xls). UNODC.

External links

- OECD Murder Rates (<http://www.quantil.com/society/oecd-murder-rates>) ; open, downloadable historical murder rates

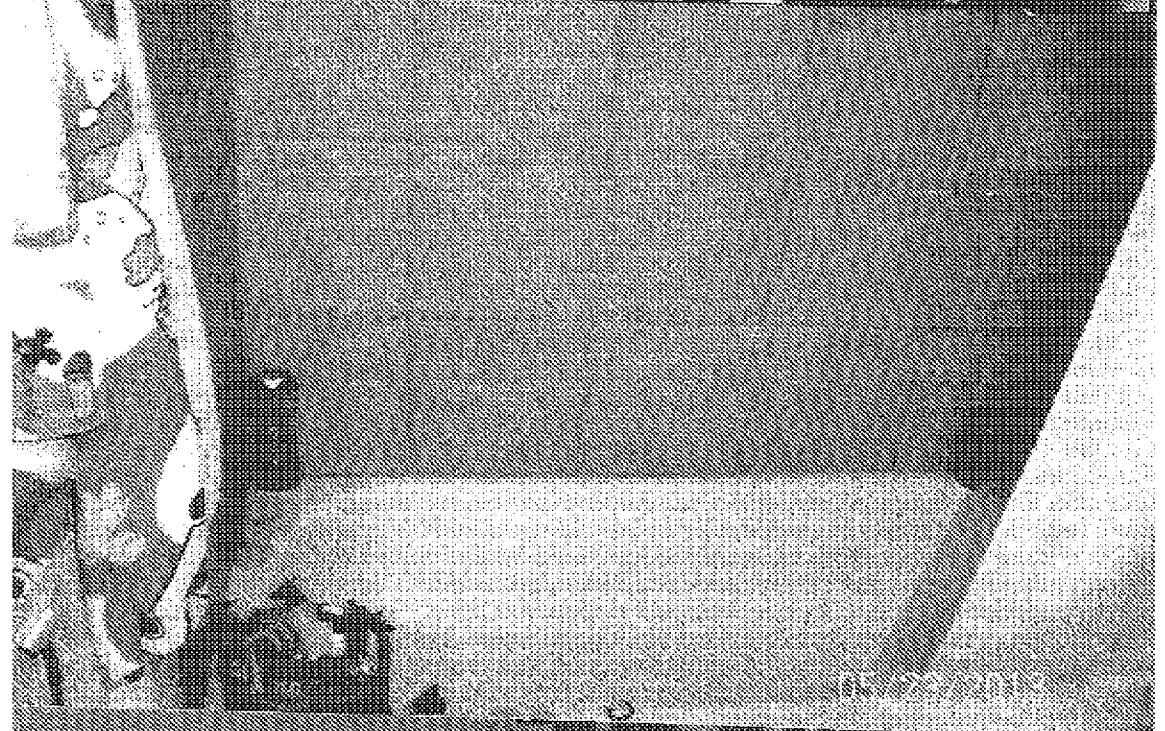
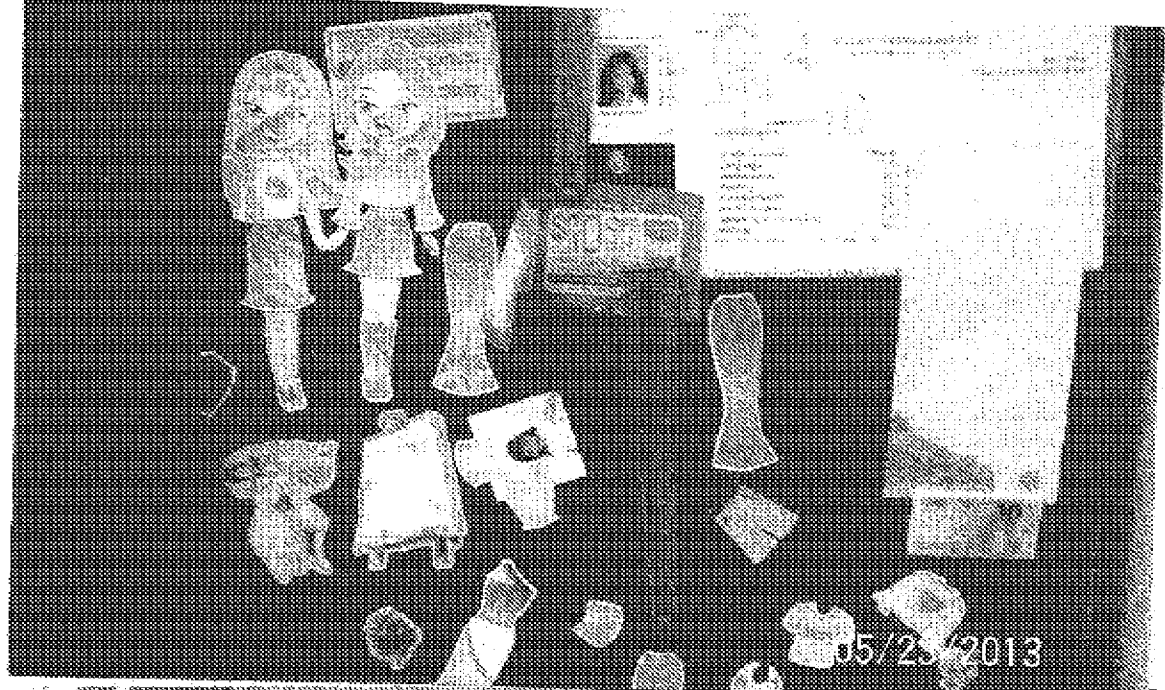
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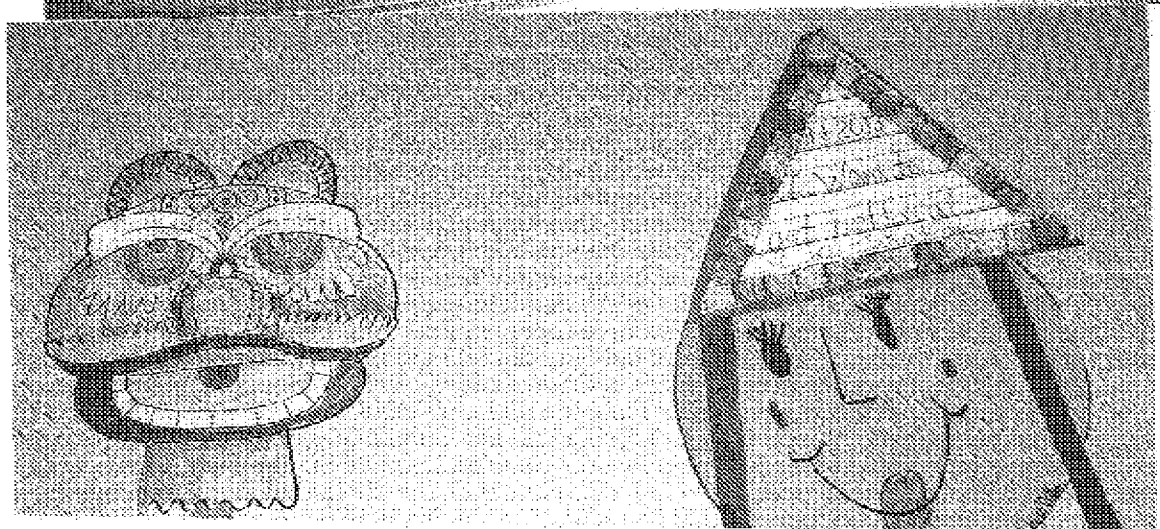
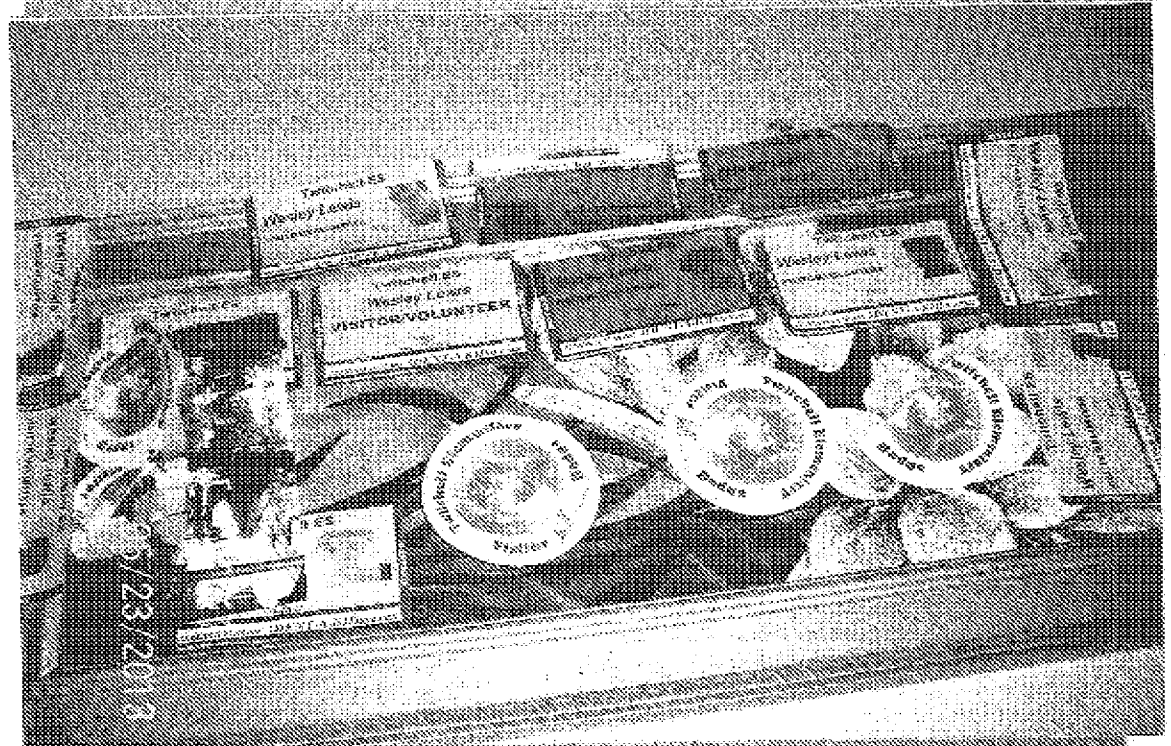
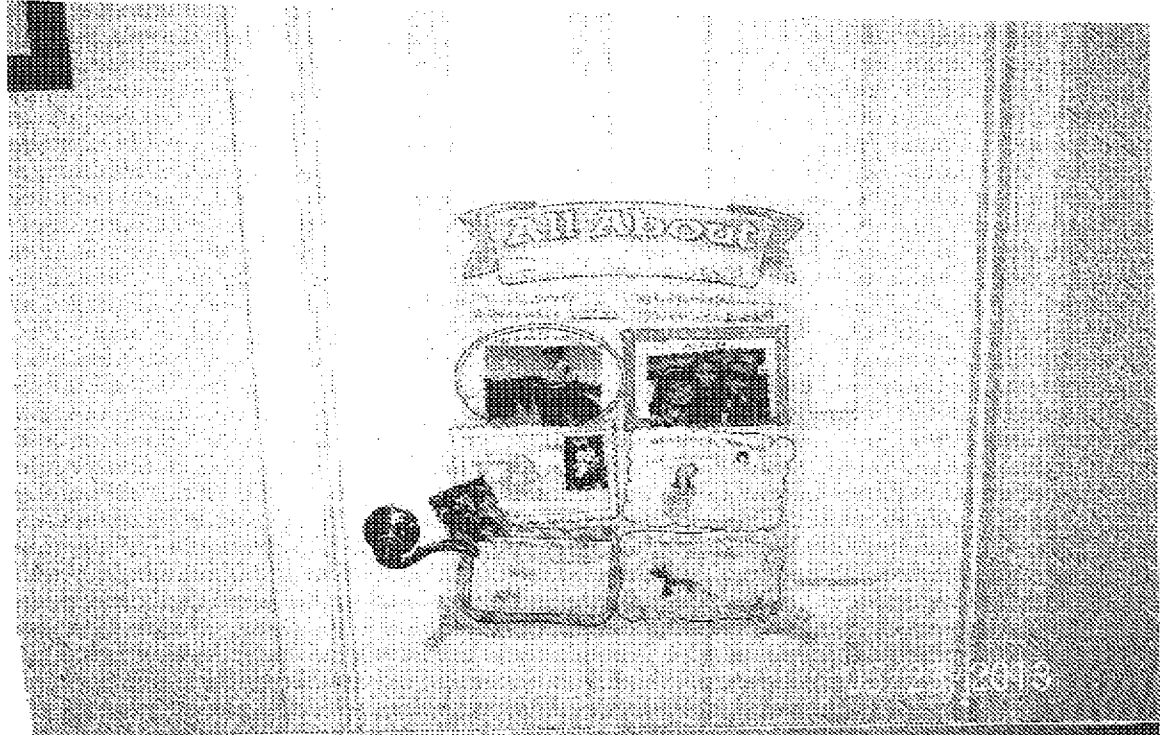
Categories: Lists of countries | Homicide statistics | Murder by country | Race and crime

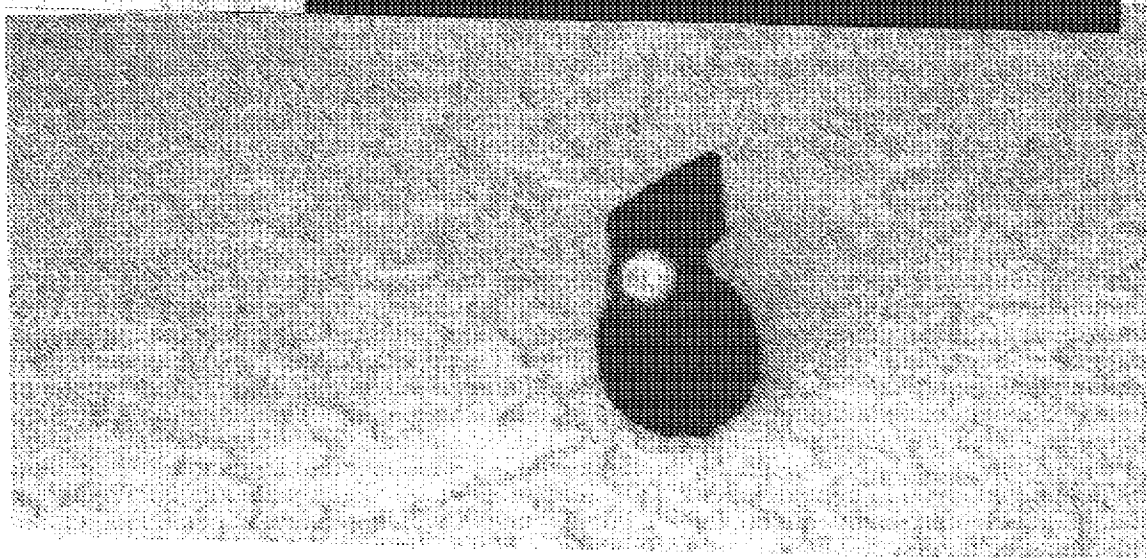
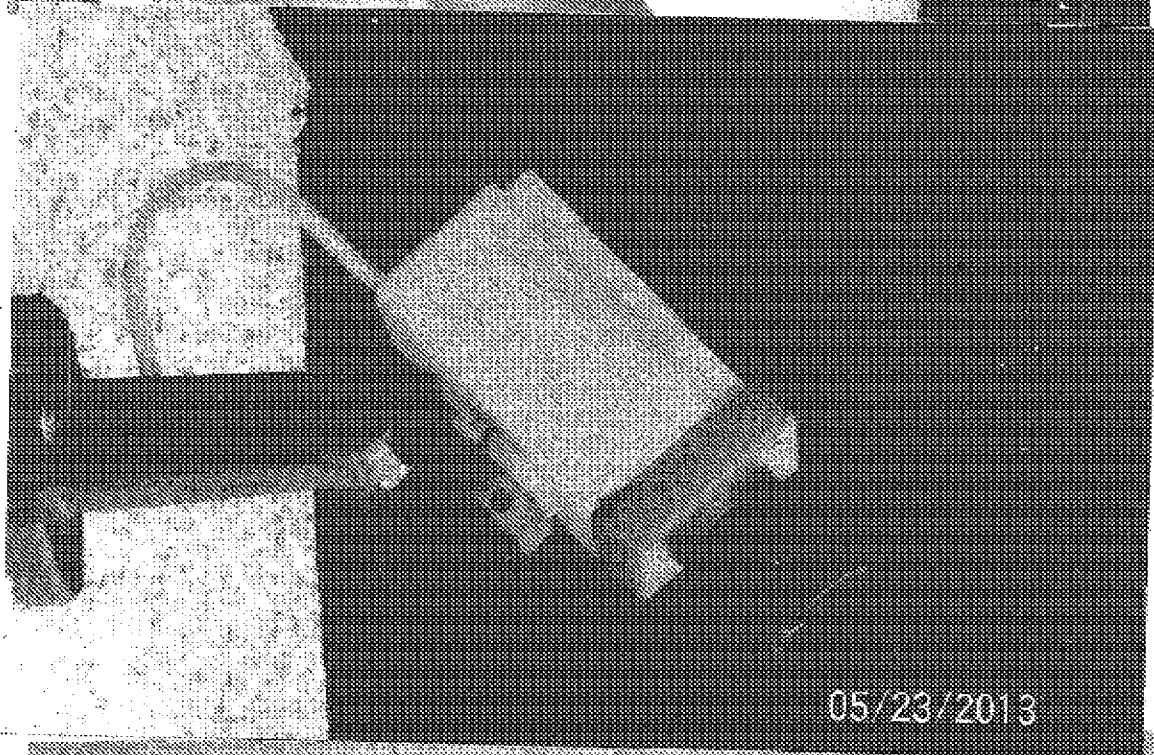
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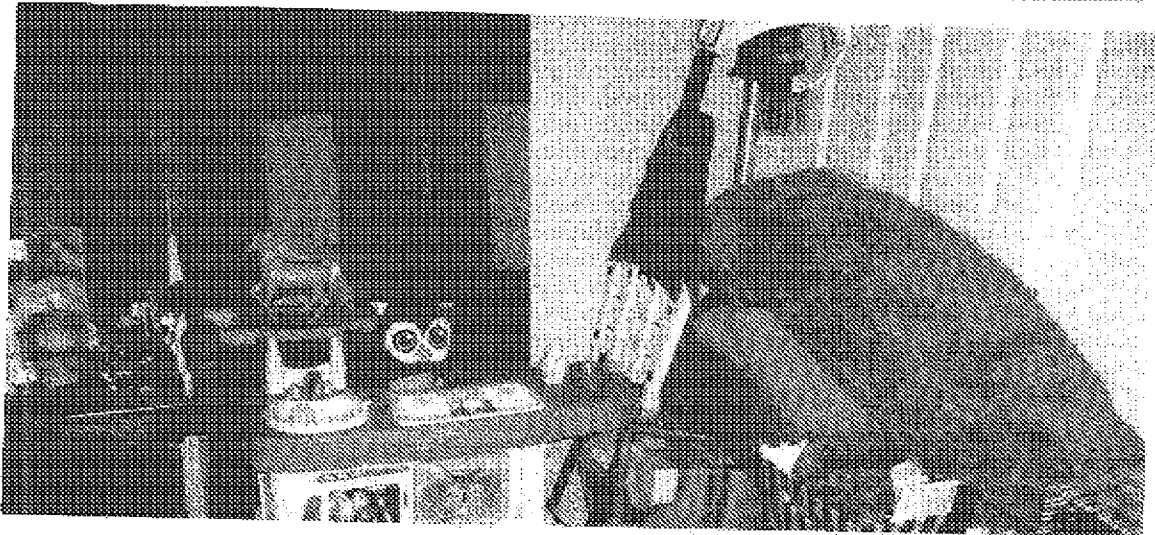
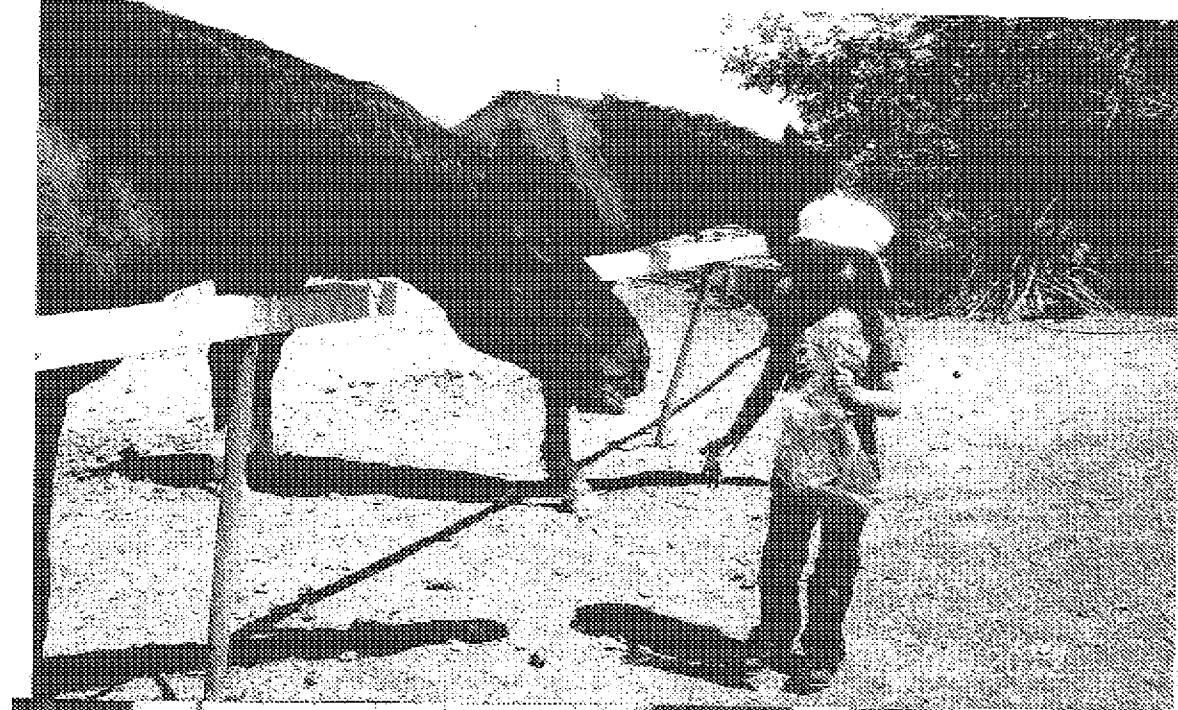
EXHIBIT E

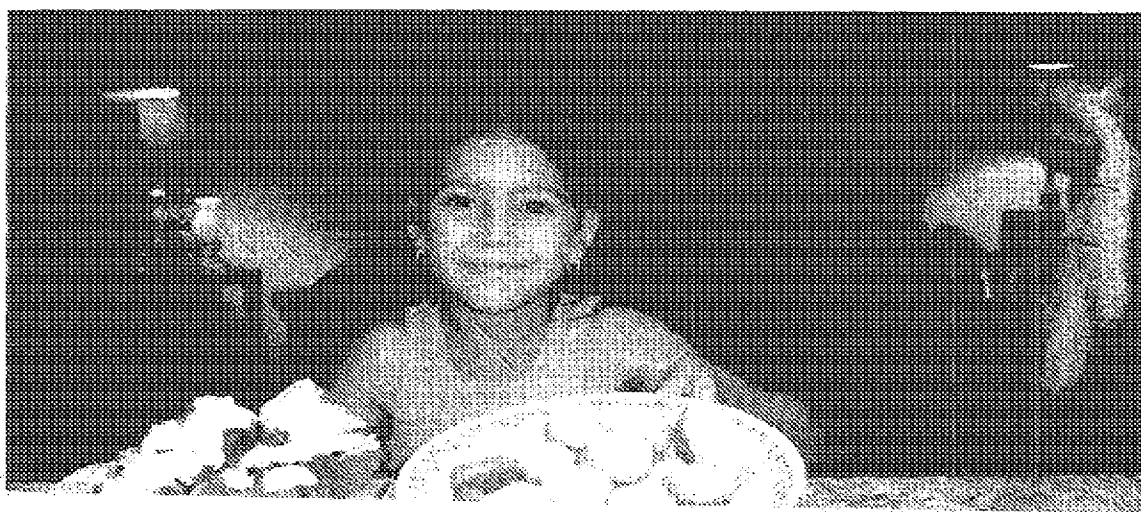


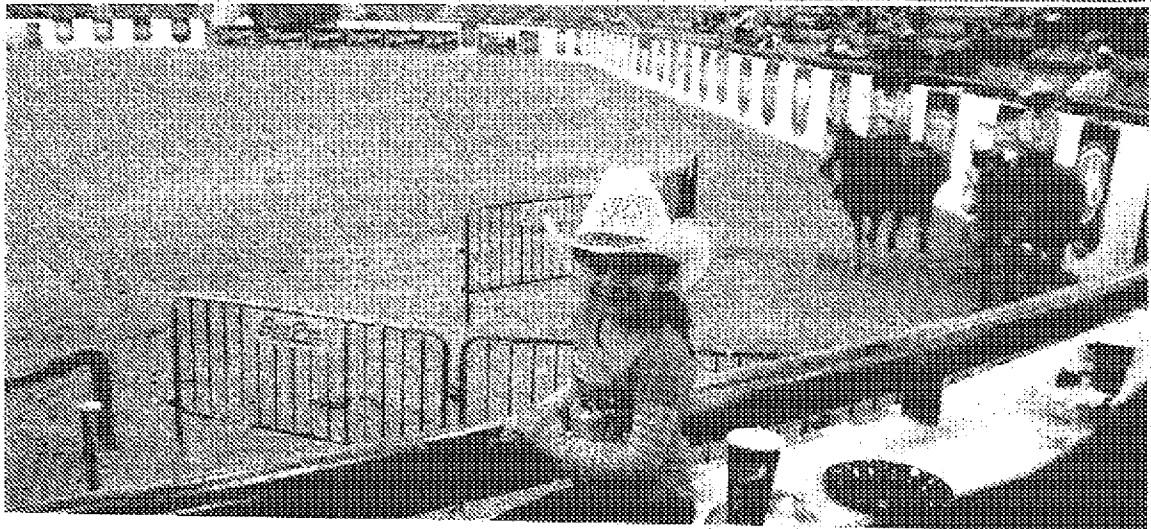
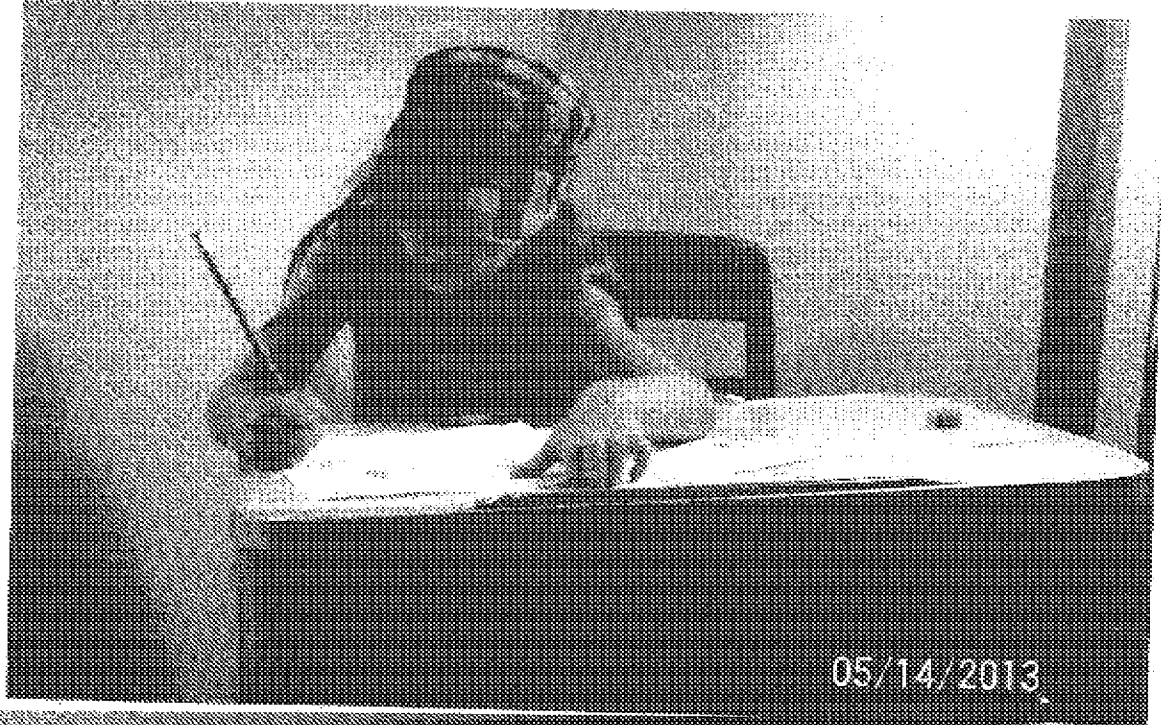


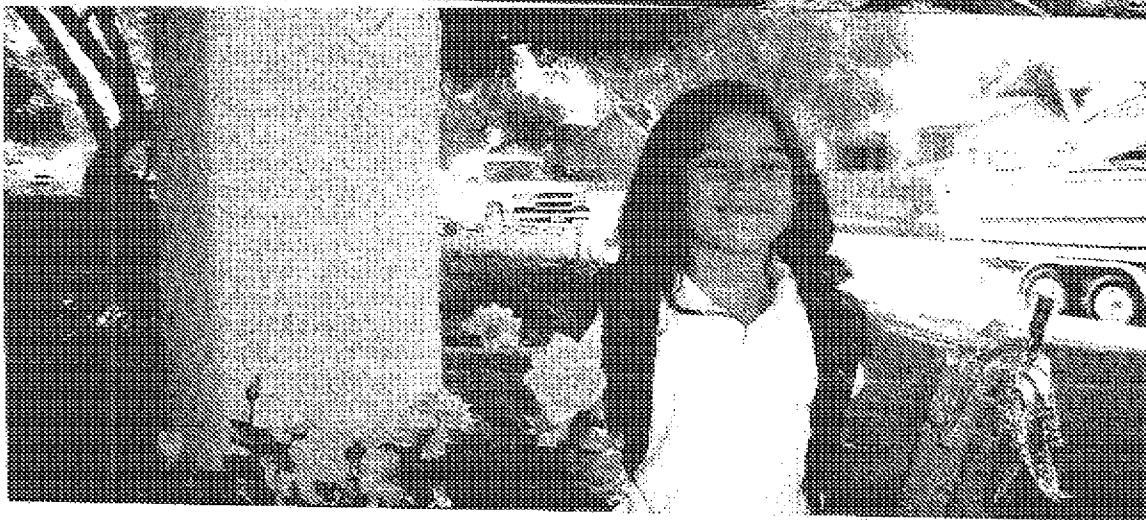
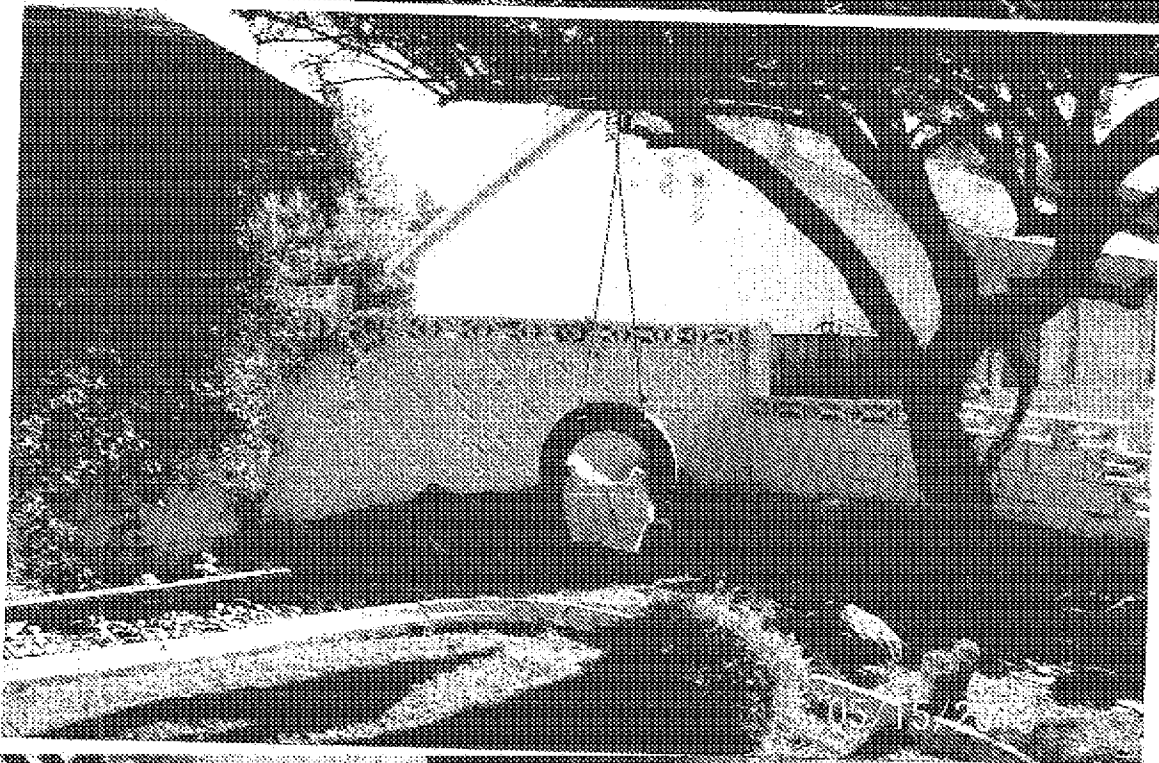


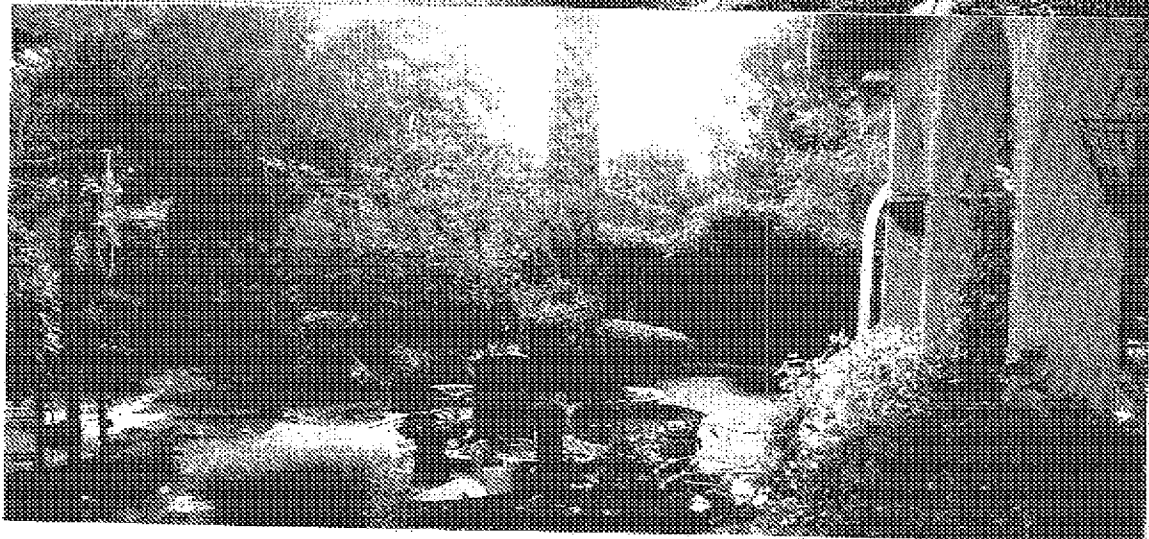
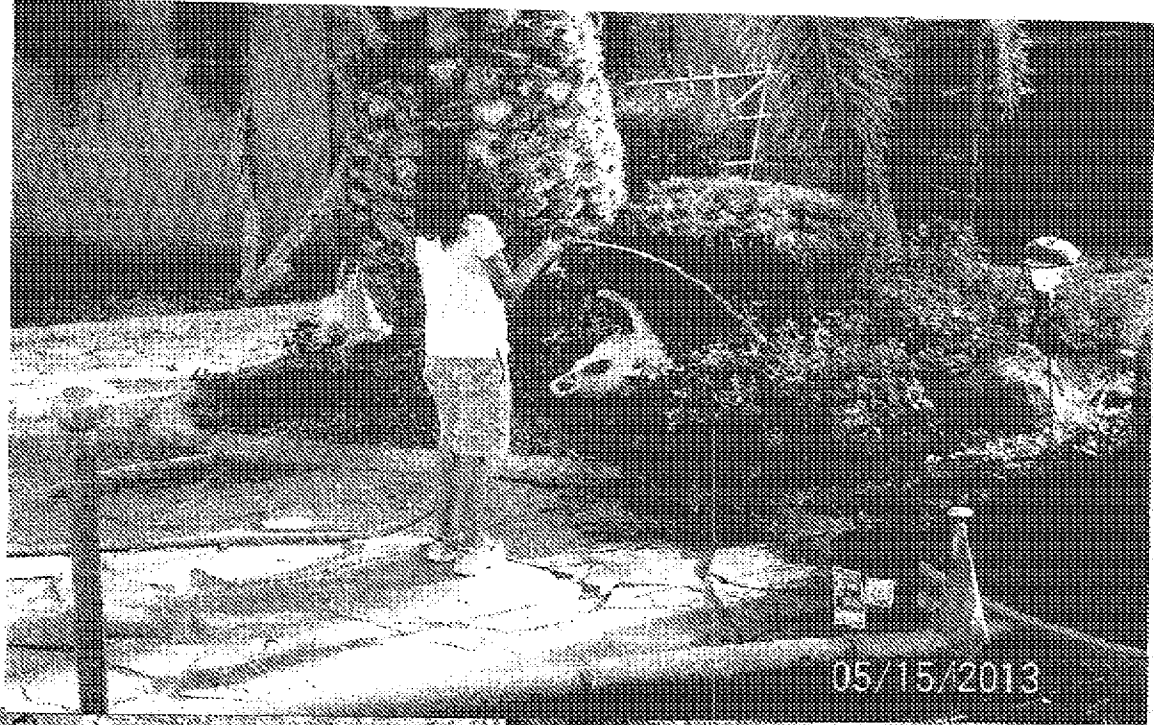












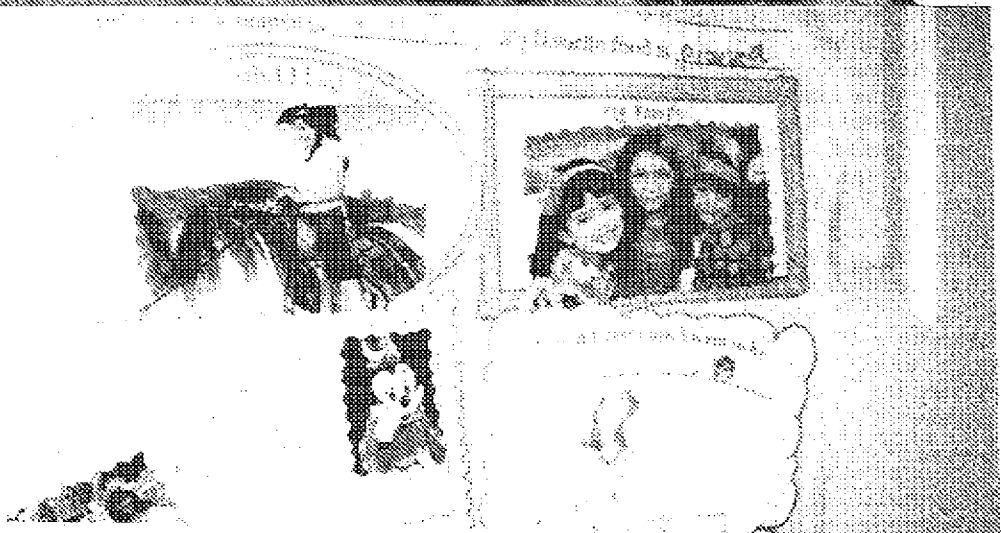
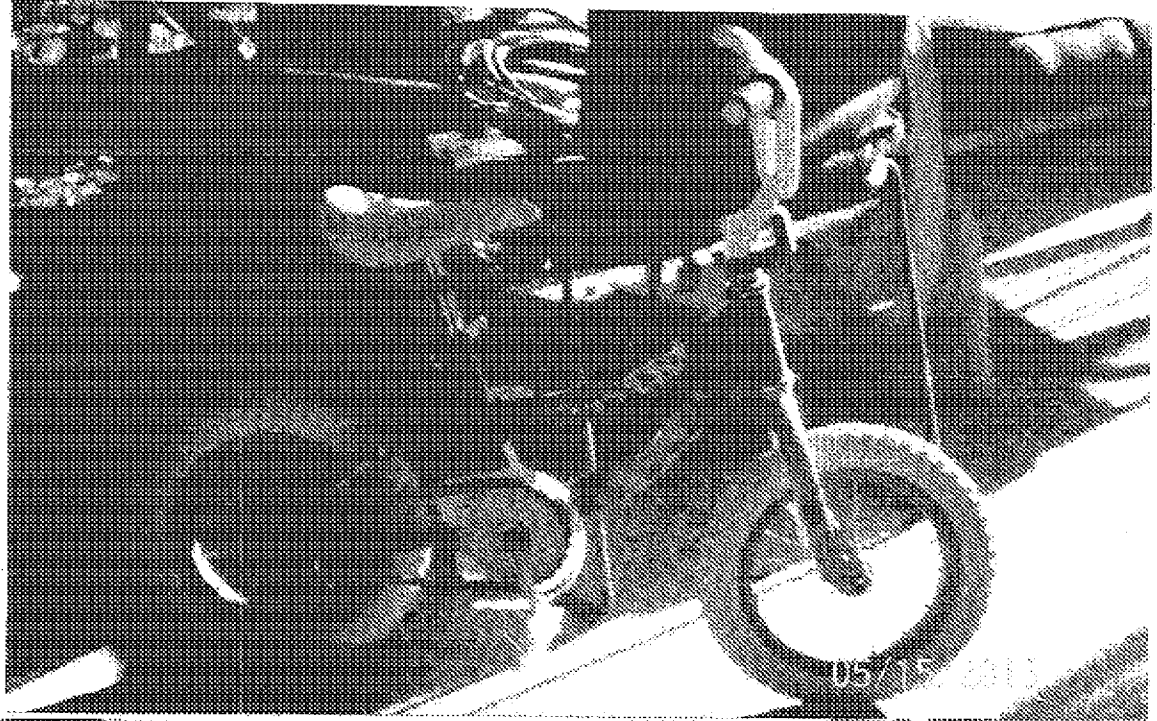


EXHIBIT F

IRS REJECT

OFFICE: 12581
 DCN: 882674201310552000
 PREPARER NAME: 12
 IRS REJECT DATE: STEPHEN ZOLEZZI
 FORM REFERENCE: 04/16/2013
 COPY NUMBER: 2:40:50PM

TAXPAYER NAME: WESLEY LEWIS
 SSN: 7003
 PHONE NUMBER: (702) 432-3966
 IRS REJECT CODE: R0003-507-01
 DATA VALUE: 680807280

ERROR DESC: 'DependentSSN' on Line 6c(2) of the return was used as a Dependent SSN in a previously filed tax return for the same tax period.

CORRECTIVE ACTION: 'DependentSSN' on Line 6c(2) of the return was used as a Dependent SSN in a previously filed tax return for the same tax period.

ORIGINAL PROBLEM:

CORRECTED INFO:

FIXED BY:

DATE/TIME RESENT:

NOTES:

CONTACT LOG

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

CALLLED CUSTOMER
 LEFT MESSAGE
 CONTACTED CUSTOMER

CODE

TRIKIA A. MARK, MD
Nevada Bar No. 8846
1105 Dean Martin Dr. Ste 185
LAS VEGAS, NV 89103
Attorney For Defendant

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

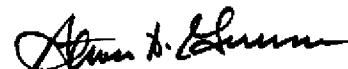
MARIA DANIELA LEWIS

Plaintiff or Petitioner

WESLEY ALLEN LEWIS

Defendant or Respondent

Case No. D-10-11764 Electronically Filed
05/29/2013 10:21:36 AM
Dept. No. 1



CLERK OF THE COURT

FINANCIAL DISCLOSURE FORM

Financial Statement of: Wesley Allen Lewis
First name Middle Last name

Occupation: Sales - Retail

Employed by: Macys Retail Group From: 10-12 To: Current

Previously Employed by: Geigley's From: 10-10 To: 11-11

Age & Date of Birth: 35 7-23-1977

Level of Education: HS

Level of Disability, if Any: NA

Marriage Date, if Applicable: _____

Present Home Address: 4650 Idaho Ave. 89104 LV, NV

How many adults (over 18) live with you? 2

How much do you receive from each of them each month? 0

I have paid my attorney a retainer of \$ 1500 and his/her hourly rate is \$ 150 hr.

I am the Plaintiff/Petitioner ☒ Defendant/Respondent in the above action. I swear under penalty of perjury, that the contents of this Financial Disclosure Declaration are true to the best of my knowledge as of this date. I understand that by my signature I verify the material accuracy of the contents. I also understand that any willful misstatements may be contemptuous and could result in my punishment by the Court. I understand I have a duty to supplement this form upon discovering additional assets or debts or upon changed circumstances within 10 days of discovery.

I declare under penalty of perjury that the foregoing and following are true and correct.

Executed on 5/29/13 Signature Wesley Lewis

Case No. _____
Dept. No. _____

PERSONAL INCOME SCHEDULE

IF SELF-EMPLOYED OR BUSINESS OWNER PLEASE FILL IN THE BUSINESS INCOME/EXPENSE SCHEDULE

YOUR OWN INCOME

EMPLOYMENT INCOME (If paid weekly multiply by 52 and divide by 12. If paid every two weeks, multiply by 26 and divide by 12)

AMOUNT

NOTE: ATTACH COPIES OF YOUR THREE MOST RECENT PAY STUBS

1	Average Gross Monthly Income from Employment (all employment income including salary \$ _____ + bonuses \$ _____ + overtime \$ _____ + commissions \$ _____ + tips \$ _____ + other \$ _____ =	\$11,684.00
2	Average Monthly Paycheck Deduction - Income Taxes	\$ 6.00
3	Average Monthly Paycheck Deduction - Social Security	\$104.00
4	Average Monthly Paycheck Deduction - Medicare	\$ 24.00
5	Average Monthly Paycheck Deduction - Health Insurance	
6	Average Monthly Paycheck Deduction - Retirement Plan or 401(k)	
7	Average Monthly Paycheck Deduction - Savings Account	
8	Average Monthly Paycheck Deduction(s) - Other	
9	Total Paycheck Deductions Per Month (Add lines 2-8 above)	
10	Average Net Monthly Income from Employment (Subtract line 9 from line 1)	\$11,550.00
OTHER INCOME		
11	Monthly Spousal Support/Alimony Awarded by a Court	
12	Monthly Child Support: court ordered \$ _____ + other/voluntary child support \$ _____ =	\$34.00
13	Investment Income (Dividends, interest and capital gains)	
14	Rental Income (Enter the Amount of Depreciation Claimed in Computing Rental Income Here: \$ _____)	
15	Retirement Income Including Defined-Benefit Distributions, 401(k) Distributions, military retirement	
16	Social Security Retirement	
17	Social Security Disability/military disability	
18	Supplemental Security Income (SSI)	
19	Unemployment Benefits	
20	Workers Compensation Payments	
21	Other Sources of Income (Describe: such as direct contributions from roommates or indirect payment of expenses by roommates)	
22	Total Other Income Per Month (Add lines 11-21)	
23	TOTAL INCOME PER MONTH (Add lines 10 and 22)	\$11,516.00

Case No. _____
 Dept. No. _____

PERSONAL EXPENSE SCHEDULE (NOTE: ALL EXPENSES LISTED BELOW SHOULD BE ON AN AVERAGE MONTHLY BASIS: annual payments divided by 12, semiannual payments divided by 6, and quarterly payments divided by 3)		TOTAL AMOUNT
1	Mortgage or Rent: 1st Mtg. \$ <u>350</u> + 2nd Mtg. \$ _____ + line of credit \$ _____ + taxes \$ _____ + insurance _____ =	350
2	Utilities: Gas/Oil \$ _____ + electricity \$ _____ + TV/cable \$ _____ + water & _____ + garbage _____ =	
3	Telephone: landline \$ _____ + cellular \$ <u>100</u> + internet \$ _____ + fax \$ _____ + other \$ _____ =	100
4	Food, Groceries & Incidentals (not including entertainment or dining out)	130
5	Transportation: monthly payment/lease \$ _____ + gas and oil \$ <u>30</u> + repairs and maintenance, tires \$ <u>30</u> + insurance \$ <u>120</u> + license/registration \$ _____ + parking \$ _____ + public transportation \$ _____ + other \$ _____ =	270
6	House Maintenance: housekeeping \$ _____ + garden/lawn care \$ _____ + snow removal \$ _____ + repairs & maintenance \$ _____ + other \$ <u>15</u> =	15
7	Entertainment: dining out \$ <u>20</u> + movies, shows \$ <u>15</u> + music/videos \$ _____ + other \$ _____ =	35
8	Dues, Memberships, Fees: Professional \$ _____ + memberships (health club, country club) \$ _____ + homeowners \$ _____ + fraternal \$ _____ + business \$ _____ + other \$ _____ =	
9	Health/exercise: clothing/shoes \$ _____ + fees/passes (health clubs etc.) \$ _____ + other \$ <u>40</u> =	40
10	Clothing: self \$ <u>50</u> + children \$ <u>50</u> + cleaning \$ _____ =	100
11	Vacations	
12	Pets: Food \$ _____ + boarding \$ _____ + healthcare \$ _____ + grooming \$ _____ + other \$ _____ =	
13	Healthcare: Insurance \$ _____ + unreimbursed, medical \$ <u>30</u> + dental \$ _____ + orthodontic \$ _____ + medications \$ <u>120</u> + counseling \$ _____ + physical therapy \$ _____ + chiropractic \$ _____ + other \$ _____ =	150
14	Appearance: hair \$ <u>10</u> + nails \$ _____ + facials/massage \$ _____ + cosmetics \$ _____ + other \$ _____ =	10
15	Insurance: life \$ _____ + disability \$ _____ + other \$ _____ =	
16	Books, Newspapers & Magazines	
17	Church/Charitable	10
18	Accounting & Tax Preparation	
19	Support of Others: Ordered Child Support \$ <u>30</u> + voluntary child support \$ _____ + court-ordered spousal support \$ _____ + eldercare \$ _____ =	30
20	Miscellaneous: Gifts \$ _____ + storage \$ <u>40</u> + flowers \$ _____ + savings \$ _____ + Lawyers fees \$ _____ + other \$ _____ =	90
21	Education: Tuition, Books & Fees \$ _____ + extracurricular \$ _____ + sports \$ _____ + music \$ _____ + other \$ _____ =	
22	Childcare: day care \$ _____ + preschool \$ _____ + other \$ _____ =	
23	Minimum Charge Card Payments and other consumer/installment debt: credit card #1 \$ _____ + credit card #2 \$ _____ + credit card #3 \$ _____ + credit card #4 \$ _____ + other debt \$ _____ =	
24	TOTAL MONTHLY EXPENSES (Add lines 1-23 above)	\$1,320.00

Case No. _____
Dept. No. _____

INCOME/EXPENSE SUMMARY SCHEDULE

Total Monthly Income from Personal Income Schedule Line 23	\$1,516.00
Add: Total Average Net Monthly Income from Self-Employment or Business Schedule Line 30	
Less: Total Monthly Expenses from Personal Expense Schedule line 24	\$1,320.00
Net Monthly Income or (Loss)	\$196.00

Case No. _____
 Dept. No. _____

ASSET AND DEBT SCHEDULE

NOTE: PLEASE USE ADDITIONAL ASSET AND DEBT SCHEDULES, AND GENTRY TOTALS TO THIS SCHEDULE IF YOU NEED TO LIST ADDITIONAL ASSETS AND DEBTS BEYOND THE LINES PROVIDED ON THIS SCHEDULE.

Note: In general, Separate Property is defined as that acquired before marriage, or after marriage by gift or inheritance.

PROPERTY VALUE (List all assets and debts @ current values)

		TOTAL	COMMUNITY	SEPARATE	
				HUSBAND	WIFE
ASSETS					
CASH: Include the last four numbers of the account, and the name and location including the branch of the institution, including CDs.					
1					
2					
3					
4	Subtotal:				
INVESTMENTS: Include mutual funds, stocks, bonds, brokerage accounts, and other investment accounts. Provide the last four numbers of the account, and the name and location including the branch of the institution.					
5					
6					
7					
8	Subtotal:				
BUSINESS INTERESTS: If you own all or part include. Indicate percentage of ownership here.					
9					
10					
11	Subtotal:				
RECEIVABLES & DEPOSITS					
12					
13	Subtotal:				
REAL PROPERTY: Provide common address and type of property, e.g., condominium, townhouse, single-family residence, commercial or retail.					
14					
15					
16					
17					
18	Subtotal:				
AUTOS & RECREATIONAL VEHICLES: Provide make, model, mileage, and vehicle identification number.					
19					
20					
21					
22					
23					
24	Subtotal:				
PERSONAL PROPERTY: Provide information on furniture, electronics, household goods, tools, computers, artwork, precious metals and jewelry having value of \$500 or greater.					
25					
26					
27					
28					
29					
30					
31					
32					
33					
34					
35	Subtotal:				

Case No. _____
 Dept. No. _____

ASSET AND DEBT SCHEDULE					
NOTE: PLEASE USE ADDITIONAL ASSET AND DEBT SCHEDULES, AND CARRY TOTALS TO THIS SCHEDULE IF YOU NEED TO LIST ADDITIONAL ASSETS AND DEBTS BEYOND THE LINES PROVIDED ON THIS SCHEDULE.		PROPERTY VALUE (List all assets and debts @ current values)			
Note: In general, Separate Property is defined as that acquired before marriage, or after marriage by gift or inheritance.		COMMUNITY		SEPARATE	
		TOTAL		HUSBAND	WIFE
CASH VALUE OF LIFE INSURANCE. Provide information on any loans against the cash surrender value of a life insurance policy.					
36					
37					
38	Subtotal				
RETIREMENT ACCOUNTS. Provide the name of the account, account number, an administrator. Provide any information on loans against retirement assets.					
39					
40					
41					
42					
43	Subtotal				
44	TOTAL ASSETS (add Lines 4, 8, 11, 13, 18, 24, 36, 38 and 43)				
DEBT					
LONG TERM DEBT. Provide information on mortgages, notes & deeds of trust, home equity loans and lines of credit, and automobile, recreational vehicle loans and leases.					
45					
46					
47					
48					
49					
50	Subtotal				
OTHER DEBT. Charge accounts, credit cards, medical debts, and other short-term debts. Provide the name of the lender, and the last four numbers of the account.					
51					
52					
53					
54					
55					
56					
57					
58					
59	Subtotal				
60	TOTAL DEBT (add lines 50 and 59)				
61	NET WORTH (TOTAL ASSETS, line 44 MINUS TOTAL DEBT, line 60)				

Case No. _____
 Dept. No. _____

BUSINESS INCOME/EXPENSE SCHEDULE (Skip this schedule if you are not self-employed or do not own a business)		AMOUNT PER MONTH
1	Average Monthly Gross Receipts from Self-Employment, Business or Businesses	
2	Cost of Sales or Cost of Goods Sold (if applicable)	
3	Gross Profit (Subtract Line 2 from Line 1)	
4	Advertising	
5	Car and truck	
6	Commissions and fees	
7	Deductible meals	
8	Depletion	
9	Depreciation and section 179	
10	Employee benefit programs	
11	Entertainment	
12	Insurance (other than health)	
13	Interest	
14	Legal and professional	
15	Mortgage on building or office space (paid to banks, etc.)	
16	Office expense	
17	Other	
18	Pension and profit-sharing plans	
19	Rent	
20	Repairs and maintenance	
21	Supplies	
22	Taxes and licenses	
23	Travel	
24	Meals	
25	Utilities	
26	Wages	
27	Total Business Expenses Per Month Including Cost of Sales (Add Lines 4-26)	
28	Average Gross Monthly Income from Self-Employment or Business (Subtract Line 27 from Line 3)	
29	Average Estimated Tax Payments on a Monthly Basis (Estimated Tax Payments are made on a quarterly basis. As a result, the required quarterly payment would be divided by three to calculate the average monthly estimated tax payment.)	
30	Average Net Monthly Income from Self-Employment or Business (Subtract Line 29 from Line 28)	

CD FILE DEPT CLOCK WYNN NV 1013
WZJ 018257 004150 14000100350 1

MarshallRetailGroup

THE MARSHALL RETAIL GROUP, LLC
5385 WYNN ROAD
LAS VEGAS, NV 89118

Earnings Statement



Period Ending: 05/05/2013
Pay Date: 05/10/2013

Taxable: Marital Status: Single
Exemptions/Allowances:
Federal: 0
NY: No State Income Tax

WESLEY LEWIS
4650 IDAHO AVE
LAS VEGAS NV 89124

Social Security Number: XXX-XX-7083

Earnings	rate	hours	this period	year to date
Regular	9.0000	63.55	571.55	4,634.91
Commission			211.47	2,628.77
Gross Pay			783.42	7,263.68

Other Benefits and Information	this period	total to date
Hly Rt	12.33	
Sales	13,007.00	118,856.00
Personal Sales		13,007.00
Vacation Sal.		13.22

Deductions	Statutory		
Social Security Tax	-18.67	450.22	
Medicare Tax	-11.35	105.28	
Federal Income Tax		32.54	
Other			
Child Support	-15.85		
Direct Deposit	707.64		
Net Pay		68.00	

Your federal taxable wages this period are 5783.42

MarshallRetailGroup

THE MARSHALL RETAIL GROUP, LLC
5385 WYNN ROAD
LAS VEGAS, NV 89118

Advice number: 00000190350
Pay date: 05/10/2013

Deposited to the account of	account number	transit ABA	amount
WESLEY LEWIS	XXXXXX005251	XXXX XXXX	5707.64

THIS IS NOT A CHECK

NON-NEGOTIABLE

CO FILE DEPT CLOCK VCHR NO. 075
WES 016257 121156 000017044 1

MarshallRetailGroup

THE MARSHALL RETAIL GROUP, LLC
5355 WYNN ROAD
LAS VEGAS, NV 89118

Earnings Statement



Period Ending: 04/21/2013
Pay Date: 04/26/2013

Taxable Marital Status: Single
Exemption Allowances:
Federal: 5
NV: No State Income Tax

WESLEY LEWIS
4553 IDAHO AVE
LAS VEGAS NV 89124

Social Security Number: XXX-XX-7693

Earnings	rate	hours	this period	year to date
Regular	9.0000	63.90	575.10	4,062.90
Commission			295.14	2,415.30
Gross Pay			870.24	6,478.20

Deductions	Statutory		
Federal Income Tax		3.58	32.54
Social Security Tax		-53.65	401.65
Medicare Tax		-12.61	93.83
Other			
Child Support		-15.85	
Direct Deposit		-784.27	
Net Pay		50.80	

Other Benefits and Information	this period	total to date
Holy Mt	13.62	
Sales	12,432.00	105,899.00
Personal Sales		12,432.00
Vacation Bal.		11.99

Your federal taxable wages this period are \$570.24

MarshallRetailGroup

THE MARSHALL RETAIL GROUP, LLC
5355 WYNN ROAD
LAS VEGAS, NV 89118

Advice number: 00000170441
Pay date: 04/26/2013

Deposited to the account of	account number	transit ABA	amount
WESLEY LEWIS	XXXXXX9251	XXXX XXXX	\$764.27

THIS IS NOT A CHECK

NON-NEGOTIABLE

CO. FILE DEPT. CLOS. NCHS. NO. 1571
 9823 016207 09/130 0000000000

MarshallRetailGroup

THE MARSHALL RETAIL GROUP, LLC
 5365 WYNN ROAD
 LAS VEGAS, NV 89118

Earnings Statement



Period Ending: 04/07/2013
 Pay Date: 04/12/2013

Taxable Status: Single
 Exemptions/allowances:
 Federal: 5
 NV: No State Income Tax

WESLEY LEWIS
 4650 IDAHO AVE
 LAS VEGAS NV 89124

Social Security Number: XXX-XX-7083

Earnings	rate	hours	this period	year to date
Regular	9.0000	56.37	507.33	5,487.66
Commission			171.57	2,120.16
Gross Pay			\$878.90	5,608.02

Other Benefits and Information	this period	total to date
Irly Rt	12.04	
Sales	11,315.00	93,467.00
Personal Sales		11,315.00

Deductions	Statutory		
Social Security Tax		-42.09	347.70
Medicare Tax		-8.85	81.32
Federal Income Tax			25.98
Other			
Child Support		-15.85	
Direct Deposit		-511.11	
Net Pay			\$611.11

Your federal taxable wages this period are \$878.90

MarshallRetailGroup

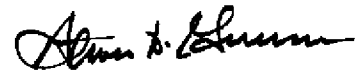
THE MARSHALL RETAIL GROUP, LLC
 5365 WYNN ROAD
 LAS VEGAS, NV 89118

Advice number: 00000150360
 Pay date: 04/12/2013

Deposited to the account of	account number	transit ABA	amount
WESLEY LEWIS	XXXXXX9201	XXXX XXXX	\$611.11

THIS IS NOT A CHECK

NON-NEGOTIABLE



CLERK OF THE COURT

1 COM
2 THE FINE LAW GROUP
3 FRANCES-ANN FINE, ESQUIRE
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

DISTRICT COURT

CLARK COUNTY, NEVADA

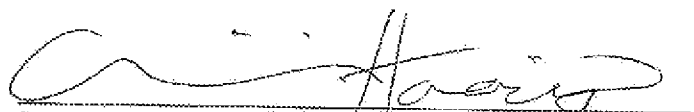
13 MARIA DANIELA LEWIS nka)
14 MARIA DANIELA PERDOMO,)
15)
16 Plaintiff,) CASE NO. D-10-427043-D
17) DEPT. NO. T
18 vs.)
19) DATE OF HEARING: 06/04/2013
20) TIME OF HEARING: 9:30 a.m.
21 WESLEY ALLEN LEWIS,)
22)
23 Defendant.)
24)
25)

CERTIFICATE OF MAILING

26 I hereby certify that on 29th day of May, 2013, service
27 of the PLAINTIFF'S SCHEDULE OF ARREARAGES filed on May 6, 2013 was
28 made by placing a copy of same into the United States Mail, first
class postage prepaid, at Las Vegas, Nevada, addressed to:

Patricia A. Marr, Esq.
Patricia A. Marr, Ltd.
4305 Dean Martin Dr., Ste. 185
Las Vegas, Nevada 89103

via email to: lvlaw03@yahoo.com



An Employee of The Fine Law Group

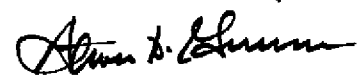
fileclerk

From: Administrator
Sent: Wednesday, May 29, 2013 1:31 PM
To: fileclerk
Subject: Delivery Status Notification (Relay)
Attachments: ATT1150156.txt; Lewis nka Perdomo v. Lewis

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

Lvlaw03@yahoo.com



CLERK OF THE COURT

1 NOTA

2 PATRICIA A. MARR, LTD.

3 PATRICIA A. MARR, ESQ.

4 Nevada Bar No. 8846

5 4305 Dean Martin Dr., Ste. 185

6 Las Vegas, Nevada 89103

7 (702) 353-4225 (phone)

8 (702) 737-1776 (fax)

9 Lvlaw03@yahoo.com

10 Attorney for Defendant

11 WESLEY ALLEN LEWIS

12 DISTRICT COURT
13 FAMILY DIVISION
14 CLARK COUNTY, NEVADA

15 MARIA DANIELA LEWIS aka
16 MARIA DANIELA PERDOMO,

17 Plaintiff,

18 v.

19 WESLEY ALLEN LEWIS,

20 Defendant.

Case No. D-10-427054

Dept No. T

Hearing Date:

Hearing Time:

NOTICE OF APPEARANCE

21 COMES NOW, PATRICIA A. MARR, ESQ., of the law firm of PATRICIA A. MARR,
22 LTD., and enters her appearance herein as attorney of record for the above-named Defendant,
23 WESLEY ALLEN LEWIS, and demands that all copies of notices, pleadings and documents be
24 served upon her at the following address:

25 ///

26 ///

27 ///

28 ///

1 4305 Dean Martin Drive, Ste. 185, Las Vegas, Nevada 89103

2 DATED this 29th day of May, 2013.

3 PATRICIA A. MARR, LTD.
4
5
6

7 PATRICIA A. MARR, ESQ.
8 Nevada Bar No. 8846
9 4305 Dean Martin Dr., Ste. 185
10 Las Vegas, Nevada 89103
11 (702) 353-4225 (phone)
12 (702) 737-1776 (fax)
13 Lvlaw03@yahoo.com
14 Attorney for Defendant
15 WESLEY ALLEN LEWIS

13 CERTIFICATE OF SERVICE

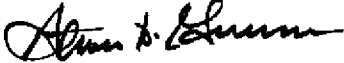
14 I HEREBY CERTIFY that on the 29th day of May, 2013, I mailed a copy of the above and
15 foregoing *NOTICE OF APPEARANCE* to the following:

16
17 Frances-Ann Fine, Esq.
18 8975 South Peccs Rd., Ste. 5
19 Henderson, Nevada 89074
20 Attorney for Plaintiff

21
22
23 An employee of Patricia A. Marr, Ltd.
24
25
26
27
28

1 RPLY
2 THE FINE LAW GROUP
3 FRANCES-ANN FINE, ESQ.
4 Nevada Bar No. 0025
5 8975 South Pecos Road, Suite 5
6 Henderson, Nevada 89074
7 Telephone: 702/384-8900
8 Facsimile: 702/384-6900
9 fran@thefinelawgroup.com
10 Attorney for Plaintiff
11 MARIA DANIELA LEWIS nka
12 MARIA DANIELA PERDOMO

Electronically Filed
05/31/2013 08:54:02 AM


CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIA DANIELA LEWIS nka)	
MARIA DANIELA PERDOMO,)	
Plaintiff,)	CASE NO. D-10-427054-D
)	DEPT. NO. T
vs.)	
)	DATE OF HEARING: 6-4-13
)	TIME OF HEARING: 9:30 a.m.
WESLEY ALLEN LEWIS,)	
)	
Defendant.)	

Plaintiff's Reply To Defendant's Response And
Counter-motion For Attorney's Fees And Related Relief

COMES NOW Plaintiff, MARIA DANIELA PERDOMO (formerly known as MARIA DANIELA LEWIS), by and through her attorney, FRANCES-ANN FINE, ESQ., of The Fine Law Group, and submits her Reply to Defendant's Response And Counter-motion.

POINTS AND AUTHORITIES

I.

DEFENDANT'S RESPONSE AND COUNTERMOTION IS UNTIMELY FILED

The pending motion by Plaintiff (hereafter "MARIA") was filed on May 2, 2013. A file-stamped copy of same was served upon Defendant (hereafter "WESLEY") by mail on May 3, 2013. Accordingly, WESLEY's opposition to the motion was required to be served and filed on May 20, 2013, pursuant to EDCR 2.20.

**PLEADING
CONTINUES
IN NEXT
VOLUME**