LAW FIRM OF TELIA U. WILLIAMS

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Electronically Filed Mar 24 2016 08:38 a.m. Tracie K. Lindeman Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

KEVIN DANIEL ADRIANZEN,	No.: 66565
Plaintiff,	
VS.	
PAIGE ELIZABETH PETIT,	OPPOSITION TO APPELLEE'S POST-BRIEF MOTION
Defendant.	

Appellant, by and through her undersigned counsel, Telia U Williams, Esq., of the Law Office of Telia U. Williams Esq., files this opposition to the post-brief motion filed by appellee, Kevin Adrianzen.¹

¹ Kevin's post-brief motion is entitled, "Motion to Correct and Supplement Record." Again, for the sake of clarity and convenience, as well as to minimize confusion insofar as some of the parties share the same, or part of the same name, appellant will refer to herself and appellee by their first names, respectively, "Paige" and "Kevin." The minor child who is the subject of this petition, "Ryder," will also be referred to by his given, first name.

Kevin has filed another motion now that the briefing on this case has fairly concluded. It is ostensibly to "correct" or "supplement" the record. But it does no such thing. Instead, Kevin attempts to address issues, facts, and arguments that were raised by Paige's opening brief, but which he failed to address in his opposing brief. So, apparently now he tries to "get them in," or take another bite of the proverbial apple, in this inapt and extraneous motion. First, this is inappropriate because briefing has concluded, the record is what it is², and the court could not possibly benefit from inane, post-brief motion practice that it has not called for, and which only presents arguments and facts that could have, (and should have), been raised in the principal briefs.³ Second, what Kevin has presented to the court in this fugitive motion are on the one hand, patent untruths, and on the other, dubious assertions of fact, of which this court can take fair and facile judicial notice to the contrary.

Respectfully, let us start with the latter point first: Kevin has presented to this court in his fugitive motion (inasmuch as briefing concluded weeks ago), dubious assertions of fact of which this court can take fairly easy judicial notice to

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² See Appendix, to Paige's Opening brief; see Appendix, to Kevin's Opposing brief. See Paige's Reply brief as to the reason that no joint appendix was filed, nor feasible. See Paige's Reply brief, at pp. 2-3. Kevin could have included in his Appendix anything he wanted to say about the purported ease of pronunciation of ³ But insofar as Kevin has raised issues that have been addressed, or could have been addressed, in the briefing schedule, Paige must necessarily also traverse, or re-traverse them here, in her opposition to Kevin's post-brief motion.

the contrary. One such dubious assertion is Kevin's game insistence that "Adrianzen is easy to say." Kevin incredibly presents his own (self-serving) opinion in an affidavit—as though this assertion is a factual one that could be independently verified by him. Yet, without a trace of irony, Kevin has felt compelled to include a phonetic table for how to pronounce it!⁴ (Evidently, a name that is "easy" to say, nonetheless requires a phonetic transcription.) There is no logical place for Kevin's personal affidavit on this point, and the inclusion of it, borders on the ludicrous⁵. It is objectively unreasonable to suppose that a hyphenated name—which the judge ordered Ryder to take—bearing no fewer than six (6) syllables, (Petit-Adrianzen), is, in any respect, "easy" to say, read, or spell.⁶

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⁴ See Kevin's affidavit, attached to his motion. And see, Paige's Affidavit, attached to this opposition.

⁵ Yet, because Kevin has sworn that his surname is *easy* to say (and this is the "record" that Kevin wants to supplement, which he inexplicably did not try to supplement either in his Opposing brief or in his Appendix initially), such almost compels Paige to swear to the *opposite*—that Adrianzen, is not a particularly easy name to say, and especially when added to Petit. *See* Paige's affidavit, attached to this opposition.

⁶ See, e.g., In re Gougen, 691 F.3d 62 (1st Cir. 2012) ("It is a matter of common knowledge that the pouring of concrete in severely cold weather is undesirable, because it may freeze and be rendered worthless...It is likewise common knowledge, of which this court will take judicial notice, that freezing and sub-zero weather frequently occurs in the winter season in this latitude.")(citing Hiddleson v. Grand Island, 115 Neb. 287, 212 N.W. 619, 621 (1927)) (other citations, including a website supporting the judicial notice, and internal quotations omitted) (emphasis added). See also, Ashcroft v. Iqbal, 556 U.S. 662, 679 (2009) (Court must draw on its judicial experience and "common sense" in deciding a case). And see, Cincinnati Ins. Co. v. Davis, 860 N.E.2d 915 (Ct. App. Ind. 2007) ("The court is to rely on 'common sense and experience," and taking judicial, commonsense

There is absolutely no need for the court to avoid the commonsense conclusion, for what it is worth, that Petit-Adrianzen is a much more difficult last name for a

notice that, "valves and other plumbing break and spring leaks for any number of reasons that do not involve negligence" without requiring expert testimony on the point). And see, Brennan's Inc. v. Brennan's Restaurant, LLC, 360 F.3d 125 (2d. Cir. 2004), a trademark case that noted that it is within the court's purview to decide commonsense matters such as the "commonness" of a last name, and where the federal appellate court held that the name "Brennan," is a common one without need of an expert witness or testimony on the point, and made the following statement, which entreats a full quotation; Brennan is strangely apropos as a counterpart to this case, despite not being a family law case:

"In the case at hand plaintiff and defendant have a common last name. And, it is one they share with many others...Because the thrust of trademark law aims to avoid confusion as to the product's source it is unhelpful to draw rigid rules when dealing with a common last name. For our purposes in deciding this appeal, for example, it would be incorrect to insist that defendant is always entitled to use his own name in business, and it is equally incorrect to maintain that defendant is never entitled to the use of his own name to compete with the same and perhaps more famous business name of plaintiff.

While the law recognizes the unfairness of letting one person trade on the reputation or the name of another, at the same time it also recognizes that one's surname given at birth creates associations attached to that name which identify the individual...As a common last name, we think at this point and contrary to the district court that plaintiff's mark is inherently weak."

See id. at 131-32. Again, although no evidence was presented, nor expert testimony taken as to the commonness of the name, "Brennan," the federal appellate court made a reasonable, commonsense determination that factored into its decision.

little boy to manage than Petit. It cannot be reasonably disputed that Petit-Adrianzen is a more difficult name to manage than Petit. Indeed, in deciding this case, the court can, and should, take judicial notice of this.⁸

everyday experience.") That surnames longer than a few syllables are harder to say, than a shorter surname, should be a relatively commonsense proposition. Cf., e.g., Smithkline Beckman Corp. v. Proctor & Gamble Co., 591 F.Supp. 1229, 1240, FN 18 (N.D. N.Y. 1984) ("...[C] onsumers had a hard time pronouncing the ENCAPRIN [trademark name]...Common sense suggests that this initial mispronunciation of the mark would have a significant effect on how consumers subsequently pronounced it." The New York court included comments from a focus group of consumers as part of the record, regarding "Encaprin," which stated: "I have only one suggestion, is the name. You notice some—just about everybody here's had some trouble pronouncing it. It is a very hard name to pronounce and because of that, you might remember it. But it is hard to pronounce.") (Daresay, "Encaprin" is an easier name to say than "Petit-Adrianzen.") Kevin's strawman argument that Paige has an issue with "foreign sounding" names is execrably misplaced. Paige's surname, as has already been attested (and which is also judicially noticeable) is French. She has no problem with foreign-sounding surnames, just changing their son's name given at his birth to a hyphenated surname composed of Ryder's non-custodial father's surname as an honorific to him. See generally also, Paige's affidavit (also testifying to the fact, contrary to Kevin's new testimony—which was not a part of his Opposing brief—that Adrianzen is Kevin's stepfather's name).

⁷ See id. at 71 (commenting favorably on the court's using its "common sense" even if *not* taking judicial notice of an alleged fact). And there is also absolutely no need for Kevin to "supplement" (or impugn) the record well after briefing has concluded merely because testimony was not held regarding the common sense assertion that the trial court's fashioning a hyphenated surname for Ryder in order to identify him with both parents created a surname, "Petit-Adrianzen," that is both "bulky and unpronounceable." See Paige's Reply brief at p. 6. ⁸ See also, Patton v. Werner Co., 793 So. 2d 817 (Ala. 2001) (In workers compensation case, in which claimant testified that any kind of odor, including cologne or deodorant, would trigger asthma attack, court could take judicial notice of fact that it was likely that some people in courthouse were wearing deodorant or cologne; and noting, judge can use a "common-sense assumption based on

But more to the point, Paige has already presented pages of argument evidencing all of the reasons that baby Ryder's name, currently Ryder Petit, should stay the same. To recapitulate, the main reasons comprise: 1) It is already Ryder's name; 2) Ryder lives exclusively with his mother who has primary custody of him; and, 3) The trial court failed to use a clear and convincing standard (with burden on the moving party), to decide that Ryder's name should be changed, because Kevin presented no evidence, least of all, clear and compelling evidence, that could support the trial court's decision to unilaterally change the name that Paige gave Ryder at birth, to a new one forged out of Paige's and Kevin's surnames, even where Paige was awarded primary custody of Ryder, and had not changed her name upon her brief marriage to Kevin, and where it can no longer be reasonably, or constitutionally, presumed that it is in a child's "best interest" to bear his father's last name in some way.

The difficulty in pronouncing this multi-syllabic hyphenated surname—
Petit-Adrianzen—that neither of Ryder's parents chose for him, and where his parents are not married to each other, were not married to each other long, and never lived together, and where it may reasonably be expected, that none of his siblings will share the same hyphenated name, constitute just a few of many problematic outcomes from this decision, which does not account for Ryder's best interests, Paige's constitutional rights to give her son her last name, or the

articulated precedents of this court. Further back-and-forth in post-brief motions that do not better clarify these important legal issues, but stubbornly insist upon supplementing or correcting the record to include *non sequitur* factual assertions such as Kevin's self-serving affidavit that his surname is "easy" to pronounce, should be disregarded at this point. Even if his name were "easy," it would not counterbalance the many factors that weigh heavily in favor of recovering Ryder's name as it currently stands on his birth certificate (previously disclosed in Paige's appendix), and which remained undisturbed until Kevin filed for divorce from Paige: Ryder Petit.

As to the most glaring, and patent untruth that Kevin has asserted in his motion to "correct" the record is that his surname is not that of his stepfather,

Oscar Adrianzen. It is unfathomable that Kevin would lie on this point. Yet, that he evidently did. Paige's affidavit includes the marital records showing that Kevin's mother married Kevin's stepfather sixteen years ago, and took his last

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⁹ See, e.g., Magiera v. Luera, 106 Nev. 775 (1990) and Russo v. Gardner, 114 Nev. 283 (1998). See also, In re Marriage of Gulsvig, 498 N.W.2d 725 (In a divorce proceeding in which the mother was awarded custody of a child born before the entry of the divorce decree, the appellate court held that the trial court did not err in denying the father's request to change the surname of the child to the father's surname, and the court considered and rejected factors that the father provided support, exercised visitation, and had a strong interest in the preservation of his parental relationship which could be weakened if the child did not bear his surname, pointing out that generous visitation allowed the father to maintain strong ties with the child, and that such generous visitation mitigated the father's concern that he and the child should retain a strong relationship).

name, "Adrianzen." Also included in Paige's affidavit is Kevin's original surname, "Santana," from his natural father, Guillermo. Paige, who was briefly married to Kevin, has sworn that Kevin told her that Oscar Adrianzen is and always was, Kevin's "stepfather." Kevin's assertion that he has no "stepfather," and has never had a stepfather, is tantamount to fraud on the court. 11

Second, Kevin has made arguments in his post-briefing motion that he could have addressed in his principal opposition. There is no need to "correct" or supplement the record at this point. Kevin's opposition could have, and should have, included any and all corrections or supplements to the record, by means of his appendix. None of the arguments or factual assertions that Kevin has addressed now appeared for the first time in Paige's Reply brief. Paige asserted in her Opening brief that Adrianzen is Kevin's stepfather's name, and yet, Kevin has only now, after briefing has concluded, asked to "correct" or "supplement" the record to (falsely) testify in an affidavit, that Adrianzen is *not* his stepfather's name, but his natural father's name. But this Kevin could have done in his principal, Opposing brief, where Paige first made the assertion—not wait until

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¹⁰ See Paige's Affidavit.

¹¹ One of the patent untruths that Kevin has asserted in his opposition is that he is the father of only one child, Ryder. *See* Kevin's Reply, p. 17. Although such was not part of the lower court record, it is significant to note that Kevin is the father of another child since Ryder's custody was established, and Kevin's denial of this is troubling. *See* Paige's affidavit.

after Paige filed her Reply brief.

This case has gone on for more than two years. This appeal has gone on for more than a year, including the time that the parties participated in the mandatory settlement conference. Multiple motions for this case, including several extraappellate, housekeeping matters, have been filed and considered by this court. Enough is enough. Paige is the appellant; she has the right to have her Reply brief be the last in the arguments before this court, at least, unless and until the court orders oral argument. Kevin's extensive and protracted case citations to support the ostensible correction or supplementation of the record should be seen for what it is, a pretext for trying to have the last word in this appeal. But in having the last word, he has not said anything more than he has already, or could have, said.

DATED this 23rd day of March, 2016.

<u>Telia U. Williams, Esq.</u> Telia U. Williams, Esq. 10161 Park Run Dr., Ste. 150 Las Vegas, NV 89145

¹² Cf., Wood v. State, 59 Nev. 445 (1939) (Taber, J.) (Noting with disfavor appellant's filing motions after case was fully briefed and submitted for decision)

CERTIFICATE OF SERVICE

Pursuant to the Nevada Rules of Civil Procedure, I certify that I am an employee of the Law Office of Telia U. Williams and that on this 22nd day of February, 2016, I caused a true and correct copy of the above and foregoing Reply Brief to be served through the WIZNET e-filing system in accordance with the mandatory electronic service requirements of Administrative Order 14-2, and the Nevada Electronic Filing and Conversion Rules of the Eighth Judicial District Court, Nevada, to the following:

Bruce I. Shapiro, Esq. Shann D. Winesett, Esq. Pecos Law Group South Pecos Road, Suite 14A Henderson, Nevada 89074 Email@pecoslawgroup.com Attorneys for Appellee

> _/s/ David DaSilva__ of the Law Office of Telia U. Williams

AFFIDAVIT OF PAIGE PETIT

STATE OF NEVADA) ss.

- I, Paige E. Petit, being first duly sworn, depose and say, upon penalty of perjury:
 - 1. I am the Petitioner in the above-entitled action and competent to testify as to the matters contained herein.
 - 2. I make this affidavit in support of my foregoing opposition and hereby certify that the facts set forth in that document, as well as here, are true to my own knowledge, except for those matters stated upon information and belief, and as to those matters, I believe them to be true. I incorporate any facts in this affidavit in my opposition as though fully set forth therein, and vice versa.
 - 3. My ex-husband, Kevin Adrianzen, aside from being the father of my son, Ryder Petit, is also the father of a later-born, non-marital child, that was born to his ex-girlfriend last year, a daughter. Kevin has not only told me about this child, I also met his ex-girlfriend, when Kevin and she were living together, while she was pregnant with Kevin's child. Kevin's ex-girlfriend is someone personally known to me.

- 4. Kevin stated that he was having another baby when we had our rehearing in the Family Court in September 2014, and said to me that was why he was having difficulty paying child support. Also, at the Supreme Court mandatory settlement conference, that we went to in December 2014, Kevin again stated that he was expecting a child with his girlfriend. He told this to the settlement judge.
- 5. Finally, Kevin also informed me and my family when his daughter was born. Kevin and his mother, Martha (who goes by the nickname "Mattie") informed me that Kevin's new daughter is named "Raelynn." This is Ryder's half-sister. I do not know the reason that Kevin is lying about having another child besides Ryder.
- 6. Kevin's mother, Martha/Mattie has called Kevin's daughter's Raelynn Adrianzen. On her Facebook page, Kevin's mother brags that she is the "glam-ma" (grandma) to *two grandchildren, "Ryder and Raelynn Adrianzen.*" See Exhibit 3, from Martha/Mattie's Facebook page, also. But, upon information and belief, Raelynn has <u>not</u> been given the last name, Adrianzen. Instead, the child has been given her *mother's*, Kevin's exgirlfriend's surname.

- 7. Just the same, Kevin and my son, Ryder, is <u>not</u> named "Ryder Adrianzen," as Kevin's mother, Martha/Mattie, put on her Facebook page, but "Ryder Petit" or "Ryder Petit-Adrianzen," as the judge ruled.
- 8. As for Kevin's last name, when we were married, Kevin told me that his last name from birth was **not** Adrianzen. Kevin also told me that his mother is currently married to his *stepfather*, Oscar Adrianzen. Kevin has always represented to me that Mr. Adrianzen is his *stepfather*. Kevin continually holds out Mr. Adrianzen as his stepfather. Kevin's mother, Martha ("Mattie") Elena Santana/Carvajal divorced Kevin's natural father, Guillermo, and married Kevin's stepfather, Oscar Adrianzen, only sixteen years ago, on January 16, 2000. Martha wanted Kevin and his sister to have her new husband's last name, and she had their names changed.
- 9. Kevin never indicated to me that he had any familial connection to the name Adrianzen other than that his name was changed to that by his mother, due to the presence of his stepfather. *See* Exhibits 1 and 2.
- 10.I never mispresented the fact that Kevin was living with his ex-girlfriend through all of the lower court proceedings and most of these Supreme Court proceedings. Though he does not admit it in court, Kevin has admitted to me that he was living with his girlfriend, and not his mother and stepfather.

 I have also seen him return with our son to his ex-girlfriend's house, and not

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his mother and stepfather's house, overnight. Kevin has also called me from his ex-girlfriend's house with our child. Now, I am informed that Kevin has moved out from the home of his ex-girlfriend with whom he fathered "Raelynn," and goes with a new girlfriend.

- 11.I believe that the name Adrianzen is difficult to pronounce and it is cumbersome to say. It shows as an error in spelling in my word programming software and Petit does not.
- 12.I do not have a problem with foreign names. I believe it is in our baby's best interest for him to continue to be known as Ryder Petit, as he was named since his birth.

I state these facts under penalty of perjury in the state of Nevada.

DATED this 23rd day of March, 2016.

Paige Petit

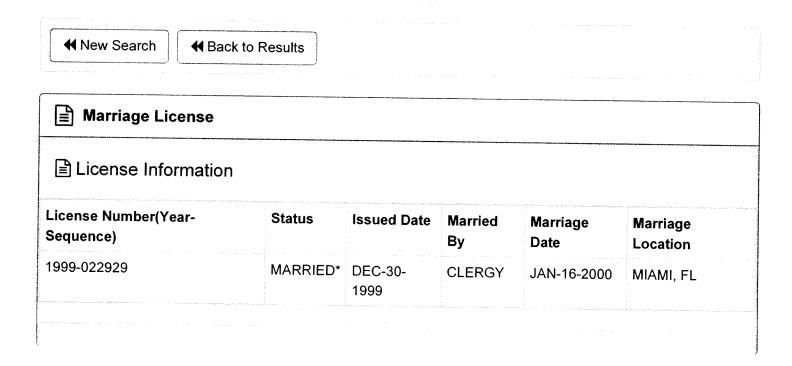
Exhibit 1

Home (http://www.miami-dadeclerk.com/home.asp) Online Services (http://www.miami-dadeclerk.com/online_services.asp) About Us (http://www.miami-dadeclerk.com/about.asp) Contact Us (http://www.miami-dadeclerk.com/contact.asp) My Account (http://www2.miami-dadeclerk.com/PremierServices/login.aspx)





Miami-Dade County Online Marriage License Bureau



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Please Note:

This record does not reflect subsequent termination of marriage by Divorce, Death, or Annulment.

Exhibit 2

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bout Us (http://www.miami-dadeclerk.com/about.asp)
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HARVEY RUVIN CLERK of the COURTS MIAMI-DADE COUNTY, FLORIDA



Miami-Dade County Civil, Family and Probate Courts Online System

← Back to Results

SANTANA, MARTHA E VS SANTAN, GUILLERMO (JR)

Local Case Number: 1994-022875-FC-04

Filing Date: 10/12/1994

State Case Number: 131994DR022875000004

Case Type: Diss Of Marriage W/children

Consolidated Case No.: N/A Judicial Section: FC17

Case Status: REPCLSD

Parties Number of Parties: 2						
Party Description	Party Name	Attorney Information	Other Attorney(s)			
Respondent	Santan, Guillermo (jr)	B#: (Bar Number)88888888 N: (Attorney Name)Unknown, Attorne	erming at them has it to be management at the discharge account in the case part of			
Petitioner	Santana, Martha E	B#: (Bar Number)88888888 N: (Attorney Name)Unknown, Attorne	v			

♣ Hearing Details

Number of Hearing: 0 +

↑ Dockets Dockets Retrieved: 154						
	Date	Book/Page	Docket Entry	Event Type	Comments	
	11/07/2008		Text	Event	CASE CONVERTED FROM MAINFRAME: SIVA	
L	08/30/1999	18762:2753	Order Closing Post Judgment	Event	B: 18762 P: 2753	
	09/29/1998	18292:2923	Order on Report of General Magistrate	Event	B: 18292 P: 2923	
	09/14/1998		General Magistrate Record of Proceeding	Event		
L)	09/14/1998	18272:3940	Report of General Magistrate	Event	B: 18272 P: 3940	
	07/13/1998		General Magistrate Record of Proceeding	Event		
	07/21/1997		Notice of Hearing-	Event	SPECIAL APPT 07/21/1997 11:30 AM	
	07/17/1997		Notice of Hearing-	Event	SPECIAL APPT 07/21/1997 11:30 AM	
	07/15/1997		Notice of Hearing-	Event	SPECIAL APPT 07/18/1997 11:30 AM	
	04/08/1997		General Magistrate Record of Proceeding	Event		
	04/08/1997	17592:3250	Recorded Document	Event	B: 17592 P: 3250 MODIFICATION AGREEMENT	
	04/08/1997	17592:3248	Report of General Magistrate	Event	B: 17592 P: 3248	
	03/06/1997		Notice of Hearing-	Event	SPECIAL APPT 03/24/1997 11:30 AM	
	02/13/1997		Letter of Correspondence	Event	FROM MICHAEL A CURREA TO JUDGE KREEGER 2/10/97	

	Date	Book/Page	Docket Entry	Event Type	Comments
	02/13/1997		Order of Referral to General Magistrate	Event	PROGRAMMENT AND THE PROGRA
	02/12/1997		GM - Referral to General Magistrate	Event	ALEJANDRO GAMBOA HEARING SET - 03/24/1997 HEARING HELD RPT/ORD RSVD J CONF CALL HRG CONT. W/OUT HRG CASE CONTINUED - 07/18/1997 CASE RESET - 07/21/1997 HEARING HELD RPT/ORD SUBMIT Due Date: 02/12/1997 Complete Date: 09/11/1998
	02/12/1997		Mdf General	Event	OTHERS
The state of the s	02/06/1997	17525:0220	Recorded Document	Event	B: 17525 P: 0220 MODIFICATION AGREEMENT
	01/31/1997		Order:	Event	GRANTING MTN TO DISCHARGE GUARDIAN AD LITEM
	01/31/1997		Notice:	Event	APPEAR FOR MINOR CHILDREND KRISTIAN AND KEVIN SANTANA
	01/17/1997	17501:0589	Order on Report of General Magistrate	Event	B: 17501 P: 0589
	01/17/1997		Order:	Event	OF REFERRAL TO THE CUSTODY INVESTIGATION UNIT
	01/17/1997		Order Appointing Guardian Ad Litem	Event	WALLACE GREER DAVIS
Marco Control of the	01/10/1997		Motion to Compel	Event	DISCOVERY
	01/10/1997		Order on Motion to Compel	Event	
	12/31/1996	17482:0001	Report of General Magistrate	Event	B: 17482 P: 0001
	12/31/1996		General Magistrate Record of Proceeding	Event	



Date Date	Book/Page	Docket Entry	Event Type	Comments
12/23/1996		Cancellation Notice	Event	12/23/1996 08:30 AM
12/20/1996		Notice of Filing:	Event	ANSWERS TO INTERROGS.& FINANCIAL AFFID.
12/20/1996		Notice of Answer to Interrogatories	Event	
12/18/1996		Text	Event	FAXED NOTICE OF CANCELLATION OF HEARING OF 12/23/96 8:30
12/18/1996		Text	Event	FAXED COVER LETTER TO MTN CALEN 12/18/96
12/09/1996		Copy of:	Event	LETTE FROM MICHAEL A CURREA ESQ TO MR KAPLAN 12/6/96
12/04/1996		Motion:	Event	FOR SECOND ORDER COMPELLING DISCOVERY
12/04/1996		Notice:	Event	OF HEARING 12-23-96 - WRONG TIME
12/04/1996		Notice:	Event	OF HEARING 12-23-96 - WRONG TIME
12/02/1996		Response:	Event	TO MTN FOR SECND ORDER COMPLEING DISCOVERY
12/02/1996		Affidavit of Indigency	Event	
12/02/1996		Motion:	Event	FOR REFERRAL TO CUSTODY INVESTIGATION UNIT
12/02/1996		Notice of Hearing-	Event	SPECIAL APPT 12/03/1996 01:30 PM
11/26/1996		Motion to Compel	Event	
11/26/1996		Notice of Hearing-	Event	SPECIAL APPT 12/02/1996 08:45 AM
11/25/1996		Notice Not Timely Filed	Event	12/02/1996 08:45 AM
11/25/1996		Notice of Hearing-	Event	SPECIAL APPT 12/03/1996 01:30 PM

Date	Book/Page	Docket Entry	Event Type	Comments
11/22/1996		Notice of Production	Event	BP-BB-stamming-state framework states (Annual Conference of Consultation of Birth Annual Conference of Annual Conf
11/13/1996		Notice of Interrogatory	Event	
11/13/1996		Request for Production	Event	
11/06/1996		Order on Motion to Compel	Event	
11/06/1996		Order of Referral to General Magistrate	Event	
11/06/1996		Order of Referral to General Magistrate	Event	
11/05/1996		GM - Referral to General Magistrate	Event	ALEJANDRO GAMBOA HEARING SET - 12/03/1996 HEARING HELD RPT/ORD SUBMIT Due Date: 11/05/1996 Complete Date: 01/09/1997
11/05/1996		Various Motions	Event	WIFE
11/05/1996		Mdf General	Event	WIFE
10/31/1996		GM - Referral to General Magistrate	Event	ALEJANDRO GAMBOA HEARING SET - 12/02/1996 CONF CALL HRG RPT/ORD SUBMIT Due Date: 10/31/1996 Complete Date: 12/31/1996
10/31/1996		Mdf General	Event	OTHERS
10/23/1996		Text	Event	SUPP. RESPONSE TO REQUEST FOR PRODUCTION
10/17/1996		Motion:	Event	TO APPOINT GUARD.AD LITEM
09/27/1996		Financial Affidavit	Event	
09/27/1996		Notice of Answer to Interrogatories	Event	
09/27/1996		Response to Request for Production	Event	

Manuscrack Adolf Colored	Date	Book/Page	Docket Entry	Event Type	Comments
	09/27/1996		Answer	Event	ATTORNEY:88888888 Parties: Santana Martha E
	09/03/1996		Subpoena Returned	Event	
	08/28/1996		Answer	Event	ATTORNEY:88888888 Parties: Santan Guillermo (jr)
	08/28/1996		Notice of Change of Address	Event	
	08/13/1996		Notice of Production	Event	
	08/12/1996		Service Returned	Event	BADGE # 4704 S 08/08/1996 Parties: Santan Guillermo (jr)
	08/09/1996		Notice of Interrogatory	Event	
	08/09/1996		Notice of Production	Event	
- 1 1	08/09/1996		Request for Production	Event	
	08/09/1996		Notice of Taking Deposition	Event	
	08/05/1996		Certificate of Indigency / Insolvency	Event	
	08/05/1996		Affidavit of Indigency	Event	
	08/05/1996		Notice of Appearance	Event	ATTORNEY:00817902 Parties: Santan Guillermo (jr)
	08/05/1996		Financial Affidavit	Event	
	08/05/1996		Summons Issued	Event	Parties: Santan Guillermo (jr)
	08/05/1996		Civil Cover	Event	
	08/05/1996		Petition for Mod Final Judgment	Event	l
	06/28/1996		Notice of Unavailability/absence	Event	
	06/25/1996		Subpoena Returned	Event	
	06/20/1996		Subpoena Returned	Event	

	Date	Book/Page	Docket Entry	Event Type	Comments
	06/20/1996	Total NASA TITLE	Response:	Event	TO REQUEST FOR DISCOVERY RESPONDENTS
	06/20/1996		Copy of:	Event	TO MR KAPLAN FROM MICHAEL CURREA ESQ 06/18/96
ON THE REAL PROPERTY OF THE PR	05/24/1996		Notice of Production	Event	
Do-cold PMV circle in the standard and additionable and a	05/24/1996		Notice of Production	Event	
Accessor and the second	05/24/1996		Notice of Interrogatory	Event	
neae maas appropries	05/24/1996		Notice of Production	Event	
	05/24/1996		Request for Production	Event	
	05/14/1996		Text	Event	INFO.SHEET
THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRE	05/14/1996		Order:	Event	FOR TRANSCRIPTION &/OR DUPLICATE TAPES
***************************************	04/26/1996		Letter of Correspondence	Event	FROM MICHAEL A CURREA TO MR KAPLAN 04/24/96
Sea well-additional management and additional management and additiona	04/26/1996		Request for Production	Event	(4 m haifa haim) barannina a minig (4 colatione haifa (4 colation) (4 de anni lei mare) (4 colation) a mai agu
	04/22/1996		Other Post Judgment Activity	Event	MOTION TO HAVE TRANSCRIPT TRANSCRIBED
	04/22/1996		Notice of Hearing Set-	Event	MOTIONS 05/13/1996 08:30 AM
L	03/04/1996	17117:1850	Order Closing Post Judgment	Event	B: 17117 P: 1850
E .	03/04/1996	17117:1816	Order on Report of General Magistrate	Event	B: 17117 P: 1816
Total and the second	02/22/1996		Subpoena Returned	Event	
de la constanta de la constant	02/20/1996		Notice of Production	Event	
And a second sec	02/20/1996		Subpoena Returned	Event	
L	02/16/1996	17105:2162	Report of General Magistrate	Event	B: 17105 P: 2162

	Date	Book/Page	Docket Entry	Event Type	Comments
	02/16/1996		Text	Event	RECORD OF PROCEEDING BEFORE THE GENERAL MASTER
	02/16/1996		Waiver:	Event	OF RULE 1.490
	02/16/1996		Financial Affidavit	Event	
	01/23/1996		Waiver:	Event	OF RULE 1.490
	01/23/1996	17071:4759	Order on Report of General Magistrate	Event	B: 17071 P: 4759
de constante de la constante d	01/05/1996		Notice of Hearing Set-	Event	MOTIONS 01/22/1996 08:30 AM
	01/05/1996		Notice of Answer to Interrogatories	Event	
ma da maria	01/05/1996		Response:	Event	TO REQUEST FOR PRODUCTION
	01/05/1996		Text	Event	MOTION FOR TO AMEND PETITION MODIFICATION
	01/05/1996		Amended Petition	Event	FOR MODIFICATION OF FINAL JUDGMENT
	01/02/1996		Waiver:	Event	OF RULE 1.490
	01/02/1996		Request for Production	Event	ett 1900 kunnina anggarragga mengamang 1900 (1) da amamang 1900 ti bada menangga anggapana apan ng pag pang pa
	01/02/1996	17048:3295	Report of General Magistrate	Event	B: 17048 P: 3295
	12/26/1995		Notice of Hearing-	Event	SPECIAL APPT 01/22/1996 01:30 PM
	12/11/1995		Notice of Hearing-	Event	SPECIAL APPT 01/22/1996 01:30 PM
	12/11/1995		Notice of Production	Event	
	12/11/1995		Request for Production	Event	
	12/11/1995		Notice of Interrogatory	Event	
	12/07/1995		Order of Referral to General Magistrate	Event	

Date	Book/Page	Docket Entry	Event Type	Comments
12/05/1995		GM - Referral to General Magistrate	Event	ALEJANDRO GAMBOA HEARING SET - 12/05/1995 HEARING HELD CASE CONTINUED - 01/22/1996 RPT/ORD RSVD J HEARING HELD RPT/ORD SUBMIT Due Date: 12/05/1995 Complete Date: 02/15/1996
12/05/1995		Mc General	Event	OTHERS
12/04/1995		Financial Affidavit	Event	
11/16/1995		Notice of Hearing-	Event	SPECIAL APPT 12/05/1995 04:00 PM
11/15/1995		Motion/petit for Enforcement	Event	
11/13/1995		Order of Referral to General Magistrate	Event	
11/09/1995		GM - Referral to General Magistrate	Event	ALEJANDRO GAMBOA HEARING SET - 12/05/1995 HEARING HELD CASE CONTINUED - 01/22/1996 RPT/ORD SUBMIT Due Date: 11/09/1995 Complete Date: 12/27/1995
11/09/1995		Various Motions	Event	OTHERS
11/09/1995		Mc General	Event	WIFE
11/08/1995		Notice of Hearing-	Event	SPECIAL APPT 12/05/1995 04:00 PM
11/06/1995		Returned Mail	Event	FROMMARTIHA SANTANA TO JUDGE KREEGER
11/01/1995		Notice of Hearing-	Event	SPECIAL APPT 12/06/1995 09:30 AM
10/30/1995		Letter of Correspondence	Event	MICHAEL CURREA 10/25/95 TO JUDGE

Date	Book/Page	Docket Entry	Event Type	Comments
10/30/1995		Order of Referral to General Magistrate	Event	archemic Angelening (in commission and an 2000 to 10 March Indiano) and angle of the commission (in the commission and an angle of the commission and an analysis and an angle of the commission and an analysis and an
10/27/1995		GM - Referral to General Magistrate	Event	ALEJANDRO GAMBOA HEARING SET - 12/05/1995 HEARING HELD CASE CONTINUED - 01/22/1996 RPT/ORD SUBMIT Due Date: 10/27/1995 Complete Date: 12/27/1995
10/27/1995		Various Motions	Event	HUSBAND
10/27/1995		Mc General	Event	HUSBAND
08/11/1995		Order of Referral to General Magistrate	Event	
06/29/1995		Motion for Contempt	Event	
06/26/1995		Notice of Hearing-	Event	SPECIAL APPT 07/24/1995 03:00 PM
06/16/1995		Notice of Hearing-	Event	SPECIAL APPT 07/06/1995 02:30 PM
06/08/1995		GM - Referral to General Magistrate	Event	ALEJANDRO GAMBOA HEARING SET - 07/06/1995 CASE RESET - 07/24/1995 STLI P/HEAR Due Date: 06/08/1995 Complete Date: 07/24/1995
06/08/1995		Mc General	Event	HUSBAND
06/01/1995		Letter of Correspondence	Event	MICHAEL CURREA 5/30/95 TO CLERK
06/01/1995		Petition for Mod Final Judgment	Event	P
04/17/1995		Motion for Contempt	Event	
11/17/1994		Certificate of Completion of Parenting Class	Event	11/5/94 Parties: Santan Guillermo (jr)

D	ate	Book/Page	Docket Entry	Event Type	Comments
] 1(0/26/1994	16565:1261	Final Judgment	Judgment	J \$ 0.00 BK:16565 PG:1261
1(0/24/1994		Notice of Hearing-	Event	SPECIAL APPT 10/26/1994 02:00 PM
1(0/12/1994		Receipt at Filing	Event	RECEIPT #111202 - P
10	0/12/1994		Filed at Courthouse Center	Event	
10	0/12/1994		Text	Event	SETTLEMENT AGREEMENT
10	0/12/1994		Answer and Waiver	Event	ATTORNEY:00000000 Parties: Santan Guillermo (jr)
10	0/12/1994		Notice of Action - Publication	Event	Parties: Santana Martha E
10	0/12/1994		Civil Cover	Event	
10	0/12/1994		Petition	Event	

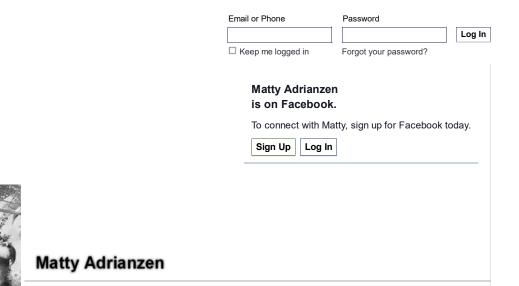
€ Back to Results

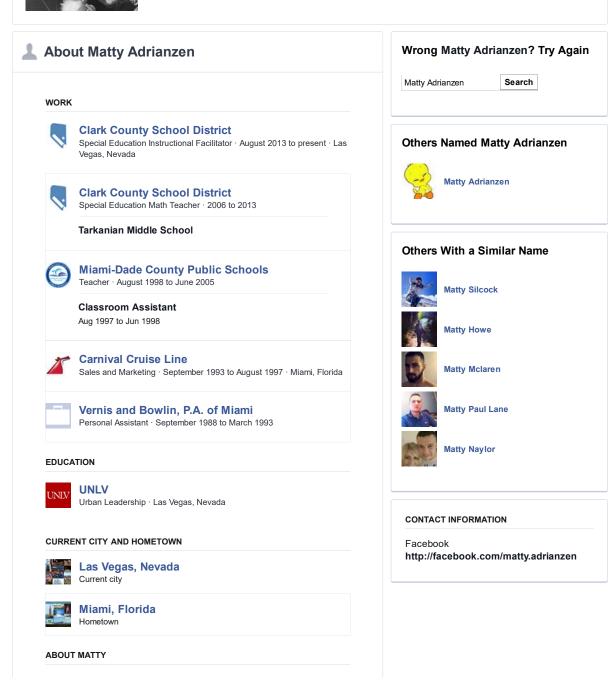
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Exhibit 3





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Proud & blessed mother of 3, loved & spoiled wife, glam-ma to Ryder And Raelynn Adrianzen, and loyal friend originally from Miami!

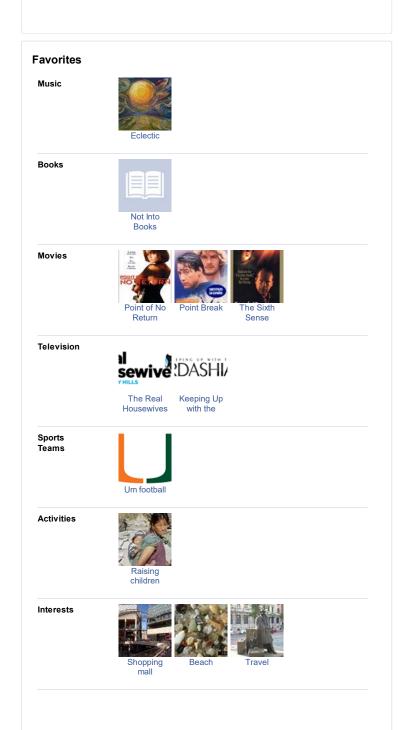
FAVORITE QUOTES

Focus on the journey, not the destination!

Life is all about creating and cherishing memories!

Happiness is just a state of mind...it's all about your attitude and your perception!

Success is just failure turned inside out!



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Inspirational People



Other

Serene Nails, Buffalo Wild Wings, Las Vegas Nevada, Florida Keys, Town Square Las Vegas, Lexus, Western Governors University, Miami, Florida, Secret Flying, Kangamoo Indoor Playground, Tarkanian Middle School, Best Buddies Nevada, The Dickinson House, Lois & Jerry Tarkanian Middle School, McKee Ranch and 16 more

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