

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

**Page Elizabeth Petit,**

Appellant,

vs.

**Kevin Daniel Adrianzen,**

Respondent.

Electronically Filed  
Apr 08 2016 01:22 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court  
Supreme Court No. 66565  
District Court No. D-13-489540-N  
(Consolidated with D-13-489542-D)

**REPLY TO OPPOSITION TO MOTION  
TO CORRECT AND SUPPLEMENT RECORD**

Respondent **Kevin Daniel Adrianzen**, by and through his attorney, **Bruce I. Shapiro, Esq.**, of the law office of Pecos Law Group, respectfully submits this Reply to Opposition to Motion to Correct and Supplement Record.

**MEMORANDUM OF POINTS AND AUTHORITIES**

Kevin's intention in filing his Motion to Correct and Supplement the Record was intended solely to ensure that this court's ruling was informed by a correct and seemingly undisputable fact. In filing the motion, Kevin had no idea how deeply Paige would complicate the issue. In her opposition, Paige argues that it is "unfathomable" that Kevin would lie about his father's surname. Kevin agrees. It is unfathomable because Kevin did not lie.

Kevin's father is Oscar Adrianzen, and Oscar Adrianzen is not Kevin's stepfather, nor has he ever been Kevin's step father. It is unfortunate that any deeper explanation is necessary, but, given severe accusations of dishonesty in Paige's opposition, further explanation is necessary. That explanation is as follows: Kevin's mother, Matty Adrianzen, was married to Guillermo Santan when Matty conceived Kevin with Oscar Adrianzen. Because of the marriage, Guillermo was placed on Kevin's birth certificate as Kevin's father. Matty's marriage to Guillermo ended on October 24, 1994, when Kevin was one year old. Guillermo voluntarily relinquished parental rights to Kevin and Oscar adopted Kevin when Kevin was about five years old. Since Oscar Adrianzen is Kevin's biological father, Oscar was never Kevin's stepfather nor could he ever have been.

In the affidavit attached to her opposition, Paige asserts that Kevin's new born daughter, Raelynn "has not been given the last name Adrianzen." See Affidavit of Paige Petit at ¶6 (emphasis original). This assertion is false. Raelynn's full name is "Raelynn Sophia Adrianzen." See Certificate of Live Birth attached hereto as Exhibit A. Paige is again wrong when she asserts, without personal knowledge, that Raelynn has been given her *mother's* surname. See Affidavit of Paige Petit at ¶6.

In response to Paige's long-winded argument regarding pronunciation – which Paige did not raise at any time before the filing of her reply brief, Kevin

respectfully submits that, if Paige is concerned with Ryder having a multi-syllabic last name, Kevin would willingly stipulate to simply use "Adrianzen" without hyphenation.

In conclusion, Kevin begs this court's pardon for having attempted to clarify a factual inconsistency which seemed so simple on its face. This reply, however, was necessary to ensure that this court not be left with the impression that Kevin has lied to it. The simple fact is that Oscar Adrianzen is Kevin's father and his namesake. That is all Kevin wanted this court to know.

**DATED** this 8 day of April, 2016.

PECOS LAW GROUP



**Bruce I. Shapiro, Esq.**

Nevada Bar No. 004050

PECOS LAW GROUP

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Henderson, Nevada 89074

(702) 388-1851

Attorney for Respondent

## **AFFIDAVIT OF MARTHA ADRIANZEN**

STATE OF NEVADA    )  
                                      :   ss.  
COUNTY OF CLARK    )

MARTHA "MATTY" ADRIANZEN, first being duly sworn, deposes and says:


1.     I am the mother to Kevin Adrianzen who is the respondent in the above-captioned appeal. I have personal knowledge of the matters contained herein and am competent to testify to the same;

2.     I am truly saddened that decisions I made at 19 years of age might have any unfavorable impact upon the outcome of my son's attempts to have Ryder share his surname. While it is embarrassing to have to formally address these issues again after so many years, I do not want the court to be under the mistaken impression that Kevin has lied to it.

3.     The simple facts are that I was married to Guillermo Santan when I conceived Kevin with Oscar Adrianzen. Because of my marriage, Guillermo was placed on Kevin's birth certificate as Kevin's father when Kevin was born on April 8, 1993. My marriage to Guillermo ended on October 24, 1994, when Kevin was one year old. Guillermo voluntarily relinquished any parental rights to Kevin, and Oscar adopted Kevin when Kevin was about five years old. Since Oscar Adrianzen

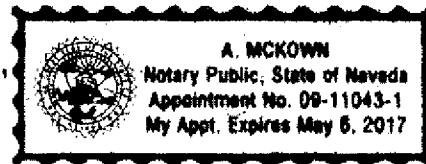
is Kevin's biological father, Oscar was never Kevin's stepfather, nor could he ever have been.

3. The assertions in Paige's affidavit notwithstanding, Kevin has never held Oscar out as his step-father. Considering that Oscar is Kevin's biological father and was intimately involved in Kevin's life since his birth, it simply makes no sense that he would do so.

  
MARTHA "MATTY" ADRIANZEN

SUBSCRIBED and SWORN before  
me this 6<sup>th</sup> day of April, 2016.

  
NOTARY PUBLIC



## AFFIDAVIT OF KEVIN ADRIANZEN

STATE OF NEVADA     )  
                                      :   ss.  
COUNTY OF CLARK    )

KEVIN ADRIANZEN, first being duly sworn, deposes and says:

1.     I am the respondent in the above-captioned appeal. I have personal knowledge of the matters contained herein and am competent to testify to the same;

2.     I have read the foregoing "Reply to Opposition to Motion to Correct and Supplement Record," and all facts stated therein are true to the best of my knowledge and belief.

3.     My father is Oscar Adrianzen, and Oscar Adrianzen is not my stepfather, nor has he ever been my stepfather. For this reason, I have never held Oscar out as my step-father.

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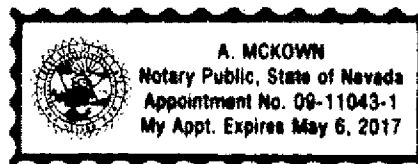
...

4. In the affidavit attached to her opposition, Paige asserts that my new born daughter, Raelynn has not been given the last name "Adrianzen." This assertion is false. Raelynn's full name is "Raelynn Sophia Adrianzen." A true and correct copy of Raelynn's Certificate of Live Birth is attached hereto as Exhibit A.

  
KEVIN ADRIANZEN

SUBSCRIBED and SWORN before  
me this 6<sup>th</sup> day of April, 2016.

  
NOTARY PUBLIC



**STATE OF NEVADA**  
**CERTIFICATION OF VITAL RECORD**

**State of Nevada - Division of Health**  
**Section of Vital Statistics**

**CERTIFICATE OF LIVE BIRTH**

CASE FILE NO. 3815517

<b>CHILD</b>	1. CHILD NAME (First, Middle, Last, Suffix) <b>Raelynn Sophia ADRIANZEN</b>		2. DATE OF BIRTH (Mo, Day, Yr) <b>January 24, 2015</b>		3. TIME OF BIRTH <b>10:30</b>	4. SEX <b>F</b>
	5. FACILITY NAME (If not institution, give street and number) <b>St Rose Dominican Hospital San Martin</b>		6. CITY, VILLAGE, OR LOCATION OF BIRTH <b>Las Vegas</b>		7. COUNTY OF BIRTH <b>Columbia</b>	
<b>MOTHER</b>	8a. MOTHER/PARENT CURRENT LEGAL NAME (First, Middle, Last) <b>Alejandrina CUEVAS URIBE</b>		8b. DATE OF BIRTH (Mo/Day/Yr) <b>October 16, 1994</b>		8c. AGE <b>20</b>	
	9. MOTHER'S NAME PRIOR TO FIRST MARRIAGE (Last, Suffix) <b>CUEVAS URIBE</b>		10. BIRTHPLACE (State, Territory, or Foreign Country) <b>Mexico</b>			
	11a. RESIDENCE OF MOTHER-STATE <b>Nevada</b>	11b. COUNTY <b>Clark</b>	11c. CITY, TOWN, OR LONGSHORE <b>Las Vegas</b>			
	11d. STREET AND NUMBER <b>6521 Neil Lane</b>		11e. APT. NO. <b></b>	11f. ZIP CODE <b>89146</b>	11g. INSIDE CITY LIMITS? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>FATHER</b>	12a. FATHER/PARENT CURRENT LEGAL NAME (First, Middle, Last, Suffix) <b>Kevin Daniel ADRIANZEN</b>		12b. DATE OF BIRTH (Mo/Day/Yr) <b>April 08, 1993</b>		12c. AGE <b>21</b>	
	12d. BIRTHPLACE (State, Territory, or Foreign Country) <b>Florida</b>					
<b>CERTIFIER &amp; ATTENDANT</b>	13a. CERTIFIER'S NAME <b>Cheryl Rabago</b>		14a. ATTENDANT'S NAME <b>Gregory Paul Giv</b>			
	TITLE <input type="checkbox"/> MD <input type="checkbox"/> DO <input type="checkbox"/> HOSPITAL ADMIN <input type="checkbox"/> CHMCM <input type="checkbox"/> OTHER MIDWIFE <input checked="" type="checkbox"/> MEDICAL RECORDS TECHNICIAN <input type="checkbox"/> OTHER (Specify) _____		ATTENDANT'S ADDRESS <b>8295 W Arroyo Avenue #300</b> <b>Las Vegas NV 89113</b>			
	15a. CERTIFIER OR ATTENDANT'S SIGNATURE <b>Cheryl Rabago SIGNATURE AUTHENTICATED</b>		15b. DATE CERTIFIED <b>02 / 01 / 2015</b> <b>MM DD YYYY</b>			
<b>REGISTRAR</b>	16a. REGISTRAR'S SIGNATURE <b>Lucinda Reid SIGNATURE AUTHENTICATED</b>		16b. DATE FILED BY REGISTRAR <b>02 / 10 / 2015</b> <b>MM DD YYYY</b>			



3815517

"CERTIFIED TO BE A TRUE AND CORRECT COPY OF THE DOCUMENT ON FILE WITH THE REGISTRAR OF VITAL STATISTICS, STATE OF NEVADA." This copy was issued by the Southern Nevada Health District from State certified documents authorized by the State Board of Health pursuant to NRS 440.175.

A000091172

DATE ISSUED: **FEB 18 2015**

Registrar of Vital Statistics  
*Lucinda Reid*

This Copy not valid unless prepared on engraved border displaying date, seal and signature of Registrar.  
SOUTHERN NEVADA HEALTH DISTRICT • P.O. Box 3902 • Las Vegas, NV 89127 • 702-750-1010 • Tax ID # 88-0151573

ANY ALTERATION OR ERASURE Voids this Certificate



EXHIBIT A