

IN THE SUPREME COURT OF THE STATE OF NEVADA

JOSUE TERRONES VALDEZ
Appellant,

Supreme Court No. 66854
District Court Case No. FV10-04478

vs.

PATRICIA SOTO AGUILAR
Respondent.

FILED

NOV 21 2014

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY *[Signature]*
DEPUTY CLERK

CORRECTED CASE APPEAL STATEMENT

1. Obligee/Appellant JOSUE TERRONES VALDEZ.
2. The Honorable Bridget E. Robb.
3. Appellant JOSUE TERRONES VALDEZ, counsel for Appellant Jonathan H. King, 429 Marsh Ave., Reno, Nevada 89509.
4. Respondent PATRICIA SOTO AGUILAR, unrepresented by counsel, 3811 Patricia Lane, Reno, Nevada 89512.
5. No attorney identified above in response to questions 3 or 4 is not licensed to practice law in Nevada. Also appearing in these proceedings has been Susan Hallahan of the Washoe County District Attorney's Office, Family Support Division, P.O. Box 11130, Reno, Nevada 89520. She is licensed to practice law in Nevada.
6. Obligee/Appellant was represented by retained counsel in District

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CLERK OF SUPREME COURT
DEPUTY CLERK

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Court.

7. Obligee/Appellant was represented by retained counsel in District Court.

8. Obligee/Appellant was granted leave to proceed in forma pauperis, by Order of the District Court filed November 10, 2014.

9. Proceedings commenced in the District Court by Notice of Intent to Enforce filed on or about December 8, 2010.

10. Appellant has primary physical custody of his son, now age 5. The mother was Ordered to pay child support, commencing September 2010. Even though a child support Order was in place, and the mother was more than \$20,000.00 in child support arrearages, she has relied upon NRS 425.360(4) to completely avoid, not just postpone, the existence of any child support obligation. Appellant seeks declaratory relief to the effect that said statute is unconstitutional both on its face and as applied to the facts and circumstances of this case. The effect of the lower Courts decision retroactively modified and eliminated twenty-seven (27) months of child support during the period between February 2011 through November 2011 and August 2012 through January 2014. The Court Master and District Judge have both ruled that during months in which public assistance is received by the mother for the benefit of a dependent child who is not

the child of Appellant that she is required to pay no child support whatsoever.

11. This case has not previously been the subject of an Appeal to or original Writ proceeding in the Supreme Court.

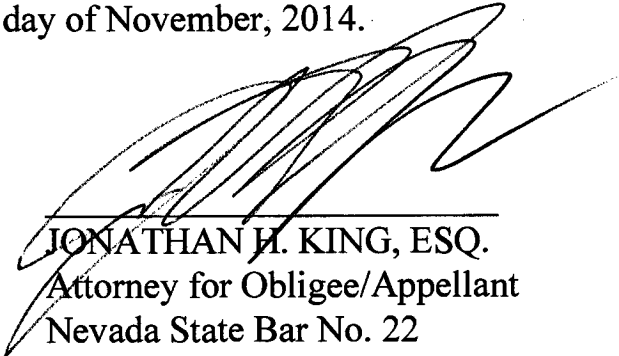
12. This Appeal does not involve child custody or visitation.

13. This Appeal does not involve the possibility of settlement.

AFFIRMATION Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED this 20th day of November, 2014.




JONATHAN H. KING, ESQ.
Attorney for Obligee/Appellant
Nevada State Bar No. 22
429 Marsh Ave.
Reno, Nevada 89509
(775)322-2211

CERTIFICATE OF SERVICE BY MAIL

Pursuant to NRCP Rule 5(b), I certify that on the 20th day of November, 2014, I deposited for mailing, in the U.S. Mail in Reno, Nevada, with postage thereon fully prepaid, a true and correct copy of the within document, addressed as follows:

Susan Hallahan
Washoe County District Attorney's Office
P.O. Box 11130
Reno, NV 89520

Patricia Soto Aguilar
3811 Patricia Lane
Reno, NV 89512


Liz Mello