

No. 67955

Electronically Filed
03/20/2015 10:28:08 AM

Alvin D. Quinn
CLERK OF THE COURT

FILED

JUL 28 2015

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

ORD
BELLON & MANINGO, LTD.
PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,
Plaintiff,
vs.
JENNIFER ELISE GORDON,
Defendant

Case No.: D-10-430639-D
Dept. No.: "T"
FAMILY COURT

ORDER

This matter having come before this Court on the 9th day of October, 2014 for an Evidentiary Hearing; Plaintiff, MATTHEW ROBERT GEIGER, appearing in person and through his attorney, PETER J. BELLON, ESQ., of BELLON & MANINGO, LTD., and Defendant, JENNIFER ELISE GORDON, appearing in person and through her attorney, GARY ZERNICH, ESQ., in an unbundled capacity; the Court having heard testimony and good cause appearing;

This Court finds that Plaintiff was injured in January 2014; that he immediately sought medical attention and that he was unable to work after that date;

This Court further finds that Plaintiff received disability benefits through April 2014.

RECEIVED

MAR 11 2015

FAMILY COURT
DEPARTMENT T

15-22021

BELLON & MANINGO, LTD.
732 SOUTH SIXTH STREET, SUITE 102
LAS VEGAS, NEVADA 89101
702-452-6299 • 702-452-6298 FAX

1 **This Court further finds** that Plaintiff's disability was
2 challenged and as a result his benefits were terminated;

3 **This Court further finds** that Plaintiff is challenging this
4 decision;

5 **This Court further finds** that Plaintiff had a warrant out for
6 his arrest. However, it was clear from the evidence that the
7 Probation Officer who took over Plaintiff's case did not have a
8 conversation with Plaintiff explaining what his new requirements
9 were;
10

11 **The Court further finds** and advised Defendant that it would
12 have been helpful if she had called Plaintiff and advised him he
13 had an outstanding warrant.

14 **The Court further finds** that it has serious concerns with
15 regard to the CPS Report involving Defendant's home and the
16 information obtained from the child interview;

17 **The Court further finds** that it believes the minor child
18 Weston when he stated that Defendant's boyfriend is punching him
19 in the stomach and arms;
20

21 **The Court further finds** that this Court ordered in 2011 that
22 Defendant's boyfriend was not to discipline WESTON and CHEVY in
23 any way. Defendant advised that WESTON was not punished by being
24 punched.

25 **The Court further finds** that despite its previous order from
26 2011 Weston continued to wrestle and Defendant's boyfriend
27 continued to discipline the minor child;
28

1 **The Court further finds** that the CPS records reveal that the
2 minor children were consistent with regard to physical punishment
3 in Defendant's house;

4 **The Court further finds** that the CPS worker and the detective
5 both believed when they interviewed another child from the
6 residence the child had been coached.

7 **The Court further finds** that it had been ready to change
8 physical custody this date based on the child interview and the
9 CPS report where the same information was provided to the CPS
10 Investigator;

11 **The Court further finds** that Defendant denies any allegation
12 of abuse in her home, but that this Court was bound to protect the
13 minor children if Defendant was unable to protect them.

14 **IT IS HEREBY ORDERED** that Defendant's request for sole legal
15 custody of the parties' two (2) minor children is denied and that
16 Finding of Facts and Conclusion of Law to this aspect of the
17 decision are waived by counsel.

18 **IT IS FURTHER ORDERED** that based on the parties' continuing
19 failure to effectively communicate, if Defendant contacts
20 Plaintiff with a reasonable request and he himself does not
21 respond by e-mail or text within forty-eight (48) hours she has
22 permission to go ahead with what she requested. Plaintiff cannot
23 rely on his wife to communicate with Defendant. He needs to
24 respond to Defendant himself.
25
26
27
28

1 **IT IS FURTHER ORDERED** that if Plaintiff does respond and the
2 parties do not agree on Defendant's request, she does not have
3 permission to proceed.

4 **IT IS FURTHER ORDERED** that Weston is involved in the school
5 band and if the band goes out of town during Plaintiff's time,
6 Weston will be allowed to go.

7 **IT IS FURTHER ORDERED** that Defendant shall inform Plaintiff
8 of any appointments she makes for the minor children the same day
9 they are made. Defendant shall not wait until the day of the
10 appointment to advise Plaintiff of same. Additionally, Plaintiff
11 may not change the children's appointments once they have been set
12 by Defendant.

13 **IT IS FURTHER ORDERED** that Plaintiff is not to remove the
14 minor children from the State of Nevada without providing
15 Defendant with an itinerary. Should he do so, this Court will
16 enter an Order preventing him from taking the children out of
17 state again.

18 **IT IS FURTHER ORDERED** that while Plaintiff is on probation,
19 he must provide Defendant with proof he has permission to travel
20 out of State.

21 **IT IS FURTHER ORDERED** that Defendant is not to leave the
22 minor children in the care of her boyfriend at any time. In the
23 event that Plaintiff can provide a credible witness that Defendant
24 has left the minor children alone with her boyfriend, a change in
25 custody would be warranted.
26
27
28

1 **IT IS FURTHER ORDERED** that Defendant's boyfriend shall not
2 discipline the minor children at any time for any reason nor shall
3 he or Defendant use any object on the children as a form of
4 discipline.

5 **IT IS FURTHER ORDERED** that both of the parties shall take the
6 ABC's of Parenting to learn how to better discipline their
7 children within the next sixty (60) days. The Court also believes
8 that it would be a good idea for Defendant's boyfriend "Matzi" to
9 also take the class.

10 **IT IS FURTHER ORDERED** that Plaintiff has permission to have
11 an unemotional discussion with the minor children about telling
12 someone at their school if they feel there are being abused or
13 physically hurt.

14 **IT IS FURTHER ORDERED** that Plaintiff shall have a safety word
15 with the children that they can use during telephone conversations
16 to let Plaintiff know they are in trouble and need assistance.

17 **IT IS FURTHER ORDERED** that Plaintiff's visitation with the
18 minor children shall be extended to include the first four (4)
19 weekends of each month, beginning on Friday at 6:00 p.m. and
20 continuing until Sunday at 6:00 p.m. Defendant shall have the
21 minor children during the fifth weekend (where applicable).

22 **IT IS FURTHER ORDERED** that in the event Defendant would like
23 to plan a trip with the children, she is to provide Plaintiff with
24 two (2) weeks notice that she wants the children for a weekend.
25 Defendant may do this up to four (4) times per year if she is
26
27
28

engaged in a special activity with the children that weekend, which will give her eight (8) weekends per year total. The rest of the weekends shall be spent with Plaintiff.

IT IS FURTHER ORDERED that the parties have been advised: PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY AS PROVIDED IN NRS 193.130. NRS 200.359 provides that every person having a limited right of custody to a child or any parent having no right of custody to the child who willfully detains, conceals or removes the child a parent, guardian or other person having lawful custody or a right to visitation of the 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.

IT IS FURTHER ORDERED that pursuant to NRS 125C.200 the parties have been advised that should the custodial parent intend to move his/her residence to a place outside the state and take the minor children with him/her, he/she must, obtain written consent of the other parent to move the children from the State. Should the non-custodial parent refuse to give that consent, the parent planning the move shall, before he/she leaves the state with the children, petition the court for permission to move the children. Failure of a parent to comply with the provisions of

1 this section may be considered as a factor if a change of custody
2 is requested by the noncustodial parent.

3 **IT IS FURTHER ORDERED** that pursuant to NRS 125.510 and NRS
4 125A.290 that the parties have been advised that the terms of the
5 Hague Convention of October 25, 1980 shall apply if a parent
6 abducts or wrongfully retains a child in a foreign country; and
7 that for the purposes of applying the terms of the Hague
8 Convention, the United States, State of Nevada is the child's
9 habitual residence.
10

11 **IT IS FURTHER ORDERED** that Plaintiff is in arrears with
12 regard to his child support obligation in the amount of \$28,879.69
13 through August 2014. Said amount is herein reduced to Judgment
14 and includes all interest and penalties.

15 **IT IS FURTHER ORDERED** Plaintiff's child support obligation
16 shall be temporarily reduced to \$200.00 per month (\$100.00 per
17 child, per month).
18

19 **IT IS FURTHER ORDERED** that this Court does not find that
20 Plaintiff is in contempt of court at this time with regard to his
21 child support payments for not being able to work. However,
22 Plaintiff is under an affirmative duty to notify Defendant when he
23 is cleared for work and is employed again.

24 **IT IS FURTHER ORDERED** that Plaintiff will provide Defendant
25 with a copy of his first paycheck stub so that his child support
26 can be recalculated. In the event that Plaintiff fails to do so,
27
28

1 he will be in contempt of this Court's order which is punishable
2 by five (5) days in jail.

3 **IT IS FURTHER ORDERED** that if Plaintiff's disability benefits
4 are reinstated, his child support will be set at twenty-five
5 percent (25%) of his disability. Plaintiff is under an
6 affirmative duty to notify Defendant if or when his benefits are
7 reinstated.

8 **IT IS FURTHER ORDERED** that both parties have been advised
9 that each person who is subject to an order for the support of a
10 minor child may request a review of said order every three years.

11 **IT IS FURTHER ORDERED** that Plaintiff has been advised that he
12 is subject to the withholding of wages and commissions for
13 delinquent payments of support pursuant to N.R.S. 31A.010, et seq.

14 **IT IS FURTHER ORDERED** that this is a permanent Order by this
15 Court sui sponte and is based on the children's interviews, which
16 were supported by CPS records.

17 DATED this 18th day of March 2015.

18
19
20
21 Lisa B.
DISTRICT COURT JUDGE, Family Division

LISA M. BROWN *P*

22 BELLON & MANINGO, LTD.

23 By: Peter J. Bellon

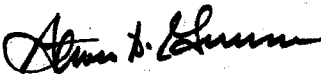
24 PETER J. BELLON, ESQ.
25 Nevada Bar No. 004528
26 732 South Sixth Street, Suite 102
27 Las Vegas, Nevada 89101
28 admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

ERROR: undefined
OFFENDING COMMAND:

STACK:

NEOJ
BELLON & MANINGO, LTD.
PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

Electronically Filed
03/20/2015 03:01:52 PM


CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,
Plaintiff,
vs.
JENNIFER ELISE GORDON,
Defendant

Case No.: D-10-430639-D
Dept. No.: "T"
FAMILY COURT

NOTICE OF ENTRY OF ORDER


TO: JENNIFER ELISE GORDON, Defendant; and
TO: GARY ZERNICH, ESQ., Counsel for Defendant (unbundled).

YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that an Order was entered in the above-entitled matter on the 20th day of March 2015, a copy of which is attached hereto.

DATED this 20th day of March 2015.

BELLON & MANINGO, LTD.

By:


PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@BellonandManingo.com
Phone: (702) 452-6299
Fax: (702) 452-6298
Attorney for Plaintiff

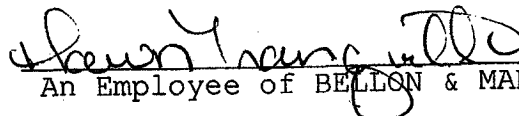
CERTIFICATE OF MAILING

I, do hereby certify that on the 20th day of March 2015, I did deposit a true and correct copy of this NOTICE OF ENTRY OF ORDER in the United States Mail, first-class postage prepaid, addressed as follows:

JENNIFER ELISE GORDON
91 Autumn Day Street
Henderson, Nevada 89012
Elise433@gmail.com

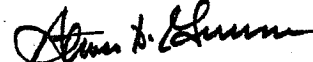
GARY M. ZERNICH, ESQ.
600 Whitney Ranch Drive, Suite A-4A
Henderson, Nevada 89014

Matthew Geiger
8659 Horizon Wind Avenue, #102
Las Vegas, Nevada 89178


An Employee of BELLON & MANINGO, LTD.

BELLON & MANINGO, LTD.

732 SOUTH SIXTH STREET, SUITE 102
LAS VEGAS, NEVADA 89101
702-452-6299 • 702-452-6298 FAX


CLERK OF THE COURT

ORD
BELLON & MANINGO, LTD.
PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,
Plaintiff,
vs.
JENNIFER ELISE GORDON,
Defendant

Case No.: D-10-430639-D
Dept. No.: "T"
FAMILY COURT

ORDER

This matter having come before this Court on the 9th day of October, 2014 for an Evidentiary Hearing; Plaintiff, MATTHEW ROBERT GEIGER, appearing in person and through his attorney, PETER J. BELLON, ESQ., of BELLON & MANINGO, LTD., and Defendant, JENNIFER ELISE GORDON, appearing in person and through her attorney, GARY ZERNICH, ESQ., in an unbundled capacity; the Court having heard testimony and good cause appearing;

This Court finds that Plaintiff was injured in January 2014; that he immediately sought medical attention and that he was unable to work after that date;

This Court further finds that Plaintiff received disability benefits through April 2014.

RECEIVED

MAR 11 2015

FAMILY COURT
DEPARTMENT T

BELLON & MANINGO, LTD.
732 SOUTH SIXTH STREET, SUITE 102
LAS VEGAS, NEVADA 89101
702-452-6299 • 702-452-6298 FAX

1 **This Court further finds** that Plaintiff's disability was
2 challenged and as a result his benefits were terminated;

3 **This Court further finds** that Plaintiff is challenging this
4 decision;

5 **This Court further finds** that Plaintiff had a warrant out for
6 his arrest. However, it was clear from the evidence that the
7 Probation Officer who took over Plaintiff's case did not have a
8 conversation with Plaintiff explaining what his new requirements
9 were;
10

11 **The Court further finds** and advised Defendant that it would
12 have been helpful if she had called Plaintiff and advised him he
13 had an outstanding warrant.

14 **The Court further finds** that it has serious concerns with
15 regard to the CPS Report involving Defendant's home and the
16 information obtained from the child interview;

17 **The Court further finds** that it believes the minor child
18 Weston when he stated that Defendant's boyfriend is punching him
19 in the stomach and arms;
20

21 **The Court further finds** that this Court ordered in 2011 that
22 Defendant's boyfriend was not to discipline WESTON and CHEVY in
23 any way. Defendant advised that WESTON was not punished by being
24 punched.

25 **The Court further finds** that despite its previous order from
26 2011 Weston continued to wrestle and Defendant's boyfriend
27 continued to discipline the minor child;
28

1 **The Court further finds** that the CPS records reveal that the
2 minor children were consistent with regard to physical punishment
3 in Defendant's house;

4 **The Court further finds** that the CPS worker and the detective
5 both believed when they interviewed another child from the
6 residence the child had been coached.

7 **The Court further finds** that it had been ready to change
8 physical custody this date based on the child interview and the
9 CPS report where the same information was provided to the CPS
10 Investigator;

11 **The Court further finds** that Defendant denies any allegation
12 of abuse in her home, but that this Court was bound to protect the
13 minor children if Defendant was unable to protect them.

14 **IT IS HEREBY ORDERED** that Defendant's request for sole legal
15 custody of the parties' two (2) minor children is denied and that
16 Finding of Facts and Conclusion of Law to this aspect of the
17 decision are waived by counsel.

18 **IT IS FURTHER ORDERED** that based on the parties' continuing
19 failure to effectively communicate, if Defendant contacts
20 Plaintiff with a reasonable request and he himself does not
21 respond by e-mail or text within forty-eight (48) hours she has
22 permission to go ahead with what she requested. Plaintiff cannot
23 rely on his wife to communicate with Defendant. He needs to
24 respond to Defendant himself.
25
26
27
28

1 **IT IS FURTHER ORDERED** that if Plaintiff does respond and the
2 parties do not agree on Defendant's request, she does not have
3 permission to proceed.

4 **IT IS FURTHER ORDERED** that Weston is involved in the school
5 band and if the band goes out of town during Plaintiff's time,
6 Weston will be allowed to go.

7 **IT IS FURTHER ORDERED** that Defendant shall inform Plaintiff
8 of any appointments she makes for the minor children the same day
9 they are made. Defendant shall not wait until the day of the
10 appointment to advise Plaintiff of same. Additionally, Plaintiff
11 may not change the children's appointments once they have been set
12 by Defendant.

13 **IT IS FURTHER ORDERED** that Plaintiff is not to remove the
14 minor children from the State of Nevada without providing
15 Defendant with an itinerary. Should he do so, this Court will
16 enter an Order preventing him from taking the children out of
17 state again.

18 **IT IS FURTHER ORDERED** that while Plaintiff is on probation,
19 he must provide Defendant with proof he has permission to travel
20 out of State.

21 **IT IS FURTHER ORDERED** that Defendant is not to leave the
22 minor children in the care of her boyfriend at any time. In the
23 event that Plaintiff can provide a credible witness that Defendant
24 has left the minor children alone with her boyfriend, a change in
25 custody would be warranted.

1 **IT IS FURTHER ORDERED** that Defendant's boyfriend shall not
2 discipline the minor children at any time for any reason nor shall
3 he or Defendant use any object on the children as a form of
4 discipline.

5 **IT IS FURTHER ORDERED** that both of the parties shall take the
6 ABC's of Parenting to learn how to better discipline their
7 children within the next sixty (60) days. The Court also believes
8 that it would be a good idea for Defendant's boyfriend "Matzi" to
9 also take the class.

10 **IT IS FURTHER ORDERED** that Plaintiff has permission to have
11 an unemotional discussion with the minor children about telling
12 someone at their school if they feel there are being abused or
13 physically hurt.

14 **IT IS FURTHER ORDERED** that Plaintiff shall have a safety word
15 with the children that they can use during telephone conversations
16 to let Plaintiff know they are in trouble and need assistance.

17 **IT IS FURTHER ORDERED** that Plaintiff's visitation with the
18 minor children shall be extended to include the first four (4)
19 weekends of each month, beginning on Friday at 6:00 p.m. and
20 continuing until Sunday at 6:00 p.m. Defendant shall have the
21 minor children during the fifth weekend (where applicable).

22 **IT IS FURTHER ORDERED** that in the event Defendant would like
23 to plan a trip with the children, she is to provide Plaintiff with
24 two (2) weeks notice that she wants the children for a weekend.
25 Defendant may do this up to four (4) times per year if she is
26
27
28

1 engaged in a special activity with the children that weekend,
2 which will give her eight (8) weekends per year total. The rest
3 of the weekends shall be spent with Plaintiff.

4 **IT IS FURTHER ORDERED** that the parties have been advised:
5 PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT OR
6 DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A
7 CATEGORY D FELONY AS PROVIDED IN NRS 193.130. NRS 200.359
8 provides that every person having a limited right of custody to a
9 child or any parent having no right of custody to the child who
10 willfully detains, conceals or removes the child a parent,
11 guardian or other person having lawful custody or a right to
12 visitation of the child in violation of an order of this court, or
13 removes the child from the jurisdiction of the court without
14 consent of either the court or all persons who have the right to
15 custody or visitation is subject to being punished for a category
16 D felony as provided in NRS 193.130.

17
18 **IT IS FURTHER ORDERED** that pursuant to NRS 125C.200 the
19 parties have been advised that should the custodial parent intend
20 to move his/her residence to a place outside the state and take
21 the minor children with him/her, he/she must, obtain written
22 consent of the other parent to move the children from the State.
23 Should the non-custodial parent refuse to give that consent, the
24 parent planning the move shall, before he/she leaves the state
25 with the children, petition the court for permission to move the
26 children. Failure of a parent to comply with the provisions of
27
28

1 this section may be considered as a factor if a change of custody
2 is requested by the noncustodial parent.

3 **IT IS FURTHER ORDERED** that pursuant to NRS 125.510 and NRS
4 125A.290 that the parties have been advised that the terms of the
5 Hague Convention of October 25, 1980 shall apply if a parent
6 abducts or wrongfully retains a child in a foreign country; and
7 that for the purposes of applying the terms of the Hague
8 Convention, the United States, State of Nevada is the child's
9 habitual residence.

10
11 **IT IS FURTHER ORDERED** that Plaintiff is in arrears with
12 regard to his child support obligation in the amount of \$28,879.69
13 through August 2014. Said amount is herein reduced to Judgment
14 and includes all interest and penalties.

15 **IT IS FURTHER ORDERED** Plaintiff's child support obligation
16 shall be temporarily reduced to \$200.00 per month (\$100.00 per
17 child, per month).

18 **IT IS FURTHER ORDERED** that this Court does not find that
19 Plaintiff is in contempt of court at this time with regard to his
20 child support payments for not being able to work. However,
21 Plaintiff is under an affirmative duty to notify Defendant when he
22 is cleared for work and is employed again.

23
24 **IT IS FURTHER ORDERED** that Plaintiff will provide Defendant
25 with a copy of his first paycheck stub so that his child support
26 can be recalculated. In the event that Plaintiff fails to do so,
27
28

he will be in contempt of this Court's order which is punishable by five (5) days in jail.

IT IS FURTHER ORDERED that if Plaintiff's disability benefits are reinstated, his child support will be set at twenty-five percent (25%) of his disability. Plaintiff is under an affirmative duty to notify Defendant if or when his benefits are reinstated.

IT IS FURTHER ORDERED that both parties have been advised that each person who is subject to an order for the support of a minor child may request a review of said order every three years.

IT IS FURTHER ORDERED that Plaintiff has been advised that he is subject to the withholding of wages and commissions for delinquent payments of support pursuant to N.R.S. 31A.010, et seq.

IT IS FURTHER ORDERED that this is a permanent Order by this Court sui sponte and is based on the children's interviews, which were supported by CPS records.

DATED this 18th day of March 2015.


DISTRICT COURT JUDGE, Family Division

LISA M. BROWN

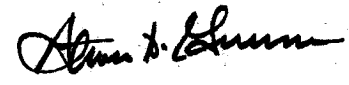
BELLON & MANINGO, LTD.

By: 

PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

ERROR: undefined
OFFENDING COMMAND:

STACK:


CLERK OF THE COURT

ORD
BELLON & MANINGO, LTD.
PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,
Plaintiff,
vs.
JENNIFER ELISE GORDON,
Defendant

Case No.: D-10-430639-D
Dept. No.: "T"
FAMILY COURT

ORDER

This matter having come before this Court on the 24th day of March, 2015 on Defendant's Motion for Reconsideration, New Trial and Amendment of Judgment Pursuant to Rule 59 and Relief from Judgments Pursuant to Rule 60(b); Plaintiff, MATTHEW ROBERT GEIGER, appearing in person and through his attorney, PETER J. BELLON, ESQ., of BELLON & MANINGO, LTD., and Defendant, JENNIFER ELISE GORDON, appearing in Proper Person; the Court having heard testimony and good cause appearing;

This Court finds that upon review of the record and pleadings in this matter that Defendant's parental rights were not violated and the orders from October 9, 2014 were proper;

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

RECEIVED

MAR 25 2015

FAMILY COURT
DEPARTMENT T

BELLON & MANINGO, LTD.
732 SOUTH SIXTH STREET, SUITE 102
LAS VEGAS, NEVADA 89101
702-452-6299 • 702-452-6298 FAX

1 This Court further finds that notwithstanding same,
2 Defendant's motion appears to have been brought in good faith;
3 therefore;

4 **IT IS HEREBY ORDERED** that Defendant's Motion for
5 Reconsideration, for New Trial and Amendment or Relief from
6 Judgments on October 9, 2014 is denied in its' entirety.

7 **IT IS FURTHER ORDERED** that the parties shall attempt to work
8 out any upcoming custody/visitation issues on their own.

9 **IT IS FURTHER ORDERED** that the parties have been advised:
10 PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT OR
11 DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A
12 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
14 child or any parent having no right of custody to the child who
15 willfully detains, conceals or removes the child a parent,
16 guardian or other person having lawful custody or a right to
17 visitation of the child in violation of an order of this court, or
18 removes the child from the jurisdiction of the court without
19 consent of either the court or all persons who have the right to
20 custody or visitation is subject to being punished for a category
21 D felony as provided in NRS 193.130.

22 **IT IS FURTHER ORDERED** that pursuant to NRS 125C.200 the
23 parties have been advised that should the custodial parent intend
24 to move his/her residence to a place outside the state and take
25 the minor children with him/her, he/she must, obtain written
26
27
28

consent of the other parent to move the children from the State. Should the non-custodial parent refuse to give that consent, the parent planning the move shall, before he/she leaves the state with the children, petition the court for permission to move the children. 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.

IT IS FURTHER ORDERED that pursuant to NRS 125.510 and NRS 125A.290 the parties have been advised that the terms of the Hague Convention of October 25, 1980 shall apply if a parent abducts or wrongfully retains a child in a foreign country; and that for the purposes of applying the terms of the Hague Convention, the United States, State of Nevada is the children's habitual residence.

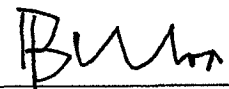
IT IS FURTHER ORDERED that there shall be no award of Attorney's Fees to Plaintiff at this time.

DATED this 8th day of April, 2015


DISTRICT COURT JUDGE, Family Division

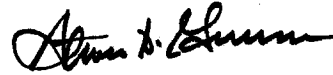
LISA M. BROWN

BELLON & MANINGO, LTD.

By: 
PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

ERROR: undefined
OFFENDING COMMAND:

STACK:


CLERK OF THE COURT

NEOJ
BELLON & MANINGO, LTD.
PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,
Plaintiff,
vs.
JENNIFER ELISE GORDON,
Defendant

Case No.: D-10-430639-D
Dept. No.: "T"
FAMILY COURT

NOTICE OF ENTRY OF ORDER

TO: JENNIFER ELISE GORDON, Defendant; and
TO: GARY ZERNICH, ESQ., Counsel for Defendant (unbundled).

YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that an Order was entered in the above-entitled matter on the 9th day of April 2015, a copy of which is attached hereto.

DATED this 10th day of April 2015.

BELLON & MANINGO, LTD.

By: 

PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@BellonandManingo.com
Phone: (702) 452-6299
Fax: (702) 452-6298
Attorney for Plaintiff

BELLON & MANINGO, LTD.
732 SOUTH SIXTH STREET, SUITE 102
LAS VEGAS, NEVADA 89101
702-452-6299 • 702-452-6298 FAX

BELLON & MANINGO, LTD.

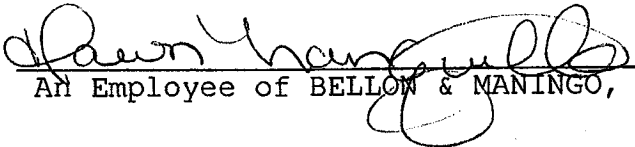
732 SOUTH SIXTH STREET, SUITE 102
LAS VEGAS, NEVADA 89101
702-452-6299 • 702-452-6298 FAX

CERTIFICATE OF MAILING

I, do hereby certify that on the 10th day of April 2015, I did deposit a true and correct copy of this NOTICE OF ENTRY OF ORDER in the United States Mail, first-class postage prepaid, addressed as follows:

JENNIFER ELISE GORDON
91 Autumn Day Street
Henderson, Nevada 89012
Elise433@gmail.com

Matthew Geiger
8659 Horizon Wind Avenue, #102
Las Vegas, Nevada 89178


An Employee of BELLON & MANINGO, LTD.

Adam L. Bellon

CLERK OF THE COURT

ORD
BELLON & MANINGO, LTD.
PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,
Plaintiff,
vs.
JENNIFER ELISE GORDON,
Defendant

Case No.: D-10-430639-D
Dept. No.: "T"
FAMILY COURT

ORDER

This matter having come before this Court on the 24th day of March, 2015 on Defendant's Motion for Reconsideration, New Trial and Amendment of Judgment Pursuant to Rule 59 and Relief from Judgments Pursuant to Rule 60(b); Plaintiff, MATTHEW ROBERT GEIGER, appearing in person and through his attorney, PETER J. BELLON, ESQ., of BELLON & MANINGO, LTD., and Defendant, JENNIFER ELISE GORDON, appearing in Proper Person; the Court having heard testimony and good cause appearing;

This Court finds that upon review of the record and pleadings in this matter that Defendant's parental rights were not violated and the orders from October 9, 2014 were proper;

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

RECEIVED

MAR 25 2015

FAMILY COURT
DEPARTMENT T

BELLON & MANINGO, LTD.
732 SOUTH SIXTH STREET, SUITE 102
LAS VEGAS, NEVADA 89101
702-452-6299 • 702-452-6298 FAX

1 **This Court further finds** that notwithstanding same,
2 Defendant's motion appears to have been brought in good faith;
3 therefore;

4 **IT IS HEREBY ORDERED** that Defendant's Motion for
5 Reconsideration, for New Trial and Amendment or Relief from
6 Judgments on October 9, 2014 is denied in its' entirety.

7 **IT IS FURTHER ORDERED** that the parties shall attempt to work
8 out any upcoming custody/visitation issues on their own.

9 **IT IS FURTHER ORDERED** that the parties have been advised:
10 PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT OR
11 DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A
12 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
14 child or any parent having no right of custody to the child who
15 willfully detains, conceals or removes the child a parent,
16 guardian or other person having lawful custody or a right to
17 visitation of the child in violation of an order of this court, or
18 removes the child from the jurisdiction of the court without
19 consent of either the court or all persons who have the right to
20 custody or visitation is subject to being punished for a category
21 D felony as provided in NRS 193.130.

22 **IT IS FURTHER ORDERED** that pursuant to NRS 125C.200 the
23 parties have been advised that should the custodial parent intend
24 to move his/her residence to a place outside the state and take
25 the minor children with him/her, he/she must, obtain written
26
27
28

consent of the other parent to move the children from the State. Should the non-custodial parent refuse to give that consent, the parent planning the move shall, before he/she leaves the state with the children, petition the court for permission to move the children. 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.

IT IS FURTHER ORDERED that pursuant to NRS 125.510 and NRS 125A.290 the parties have been advised that the terms of the Hague Convention of October 25, 1980 shall apply if a parent abducts or wrongfully retains a child in a foreign country; and that for the purposes of applying the terms of the Hague Convention, the United States, State of Nevada is the children's habitual residence.


IT IS FURTHER ORDERED that there shall be no award of Attorney's Fees to Plaintiff at this time.

DATED this 8th day of April, 2015


DISTRICT COURT JUDGE, Family Division

LISA M. BROWN 

BELLON & MANINGO, LTD.

By: 
PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

ERROR: undefined
OFFENDING COMMAND:

STACK:

ORIGINAL


CLERK OF THE COURT

MOT
JENNIFER GORDON
91 Autumn Day Street
Henderson, Nevada 89012
(702) 234-9673
Elise433@gmail.com
Defendant in Proper Person

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MATTHEW GEIGER

Plaintiff,

vs.

JENNIFER GORDON,

Defendant.

CASE NO. D-10-430639-D
DEPT. NO. T

**MOTION TO CONFORM ORDER FROM OCTOBER 09, 2014 TO COURTS
MINUTES AND JUDGE'S ORAL PRONOUNCEMENTS**

COMES NOW, Defendant, JENNIFER GORDON, appearing in proper person, and hereby request that the Court correct the Order from October 09, 2014 to what was actually ordered and not what was submitted by the Plaintiff's counsel. Defendants counsel, Mr. Zernich, did not agree with Mr. Bellon's proposed Order because there were so many reworded orders and findings, AND because there were findings and orders left completely out. That was the sole reason that Mr. Zernich never signed off as to form and content as ordered by this Court on October 9, 2015, and the sole reason this order was not submitted till recently. On November 4, 2014 Mr. Bellon contacted Mr. Zernich with his proposed order. (see exhibit A) Mr. Zernich replied on November 5, 2014 and acknowledged he had recieved the order and would review it then get back to him.(see exhibit B) On November 21, 2014 Mr. Zernich

1 replied to Mr. Bellon and stated that he didn't agree with Mr. Bellon's proposed order. He
2 specifically said " I think that your proposed order picks and chooses findings and other Court
3 notes, and misinterprets some of them." He later goes on to say " please let me know what you
4 think and then we can figure out how to proceed. Maybe in this case it might be best if we each
5 submit our own proposed order to the court, but I think the Court otherwise prefers our mutual
6 agreement." (see exhibit C) On November 25, 2015 Mr. Bellon replied, acknowledging Mr.
7 Zernich's "follow up", said he would take a look at the order and minutes again and see if there
8 was a mutual solution, then stated " Let's not worry about it until after the Thanksgiving break."
9 (see exhibit D) Mr. Bellon never did get back to Mr. Zernich instead he waited, till Defendants
10 Motion for Reconsideration, New Trial, and Relief from judgment came before this Court, to
11 submit his version of the order. Mr. Zernich never even had an option to review the order that
12 was submitted. Plaintiffs version of the order depicts findings, notes, advisements, and orders
13 that would lead someone to believe differently than what was pronounced by the Court that
14 day.. Many of the Courts Orders made that day were to hold Plaintiff accountable for his
15 repeated violations of this Court's previous orders; however Plaintiffs counsel has drastically
16 changed wording which gives the findings and orders a different meaning, and gives the illusion
17 that these are new orders and not enforcements of orders previously violated. He left out the
18 reason we were there for an evidentiary hearing, which was confusing in and of itself, but he
19 failed to even put the reason the Courts stated. Looking back at his other orders, leaving that
20 out is not normal practice for him but here, in the order of October 09, he does. This is
21 particularly true in his most recent order submitted and filed April 09, 2015. Mr. Bellon states
22 twice that we were there for Defendant's Motion for Reconsideration, New Trial, and
23 Amendment to Judgment, and Relief to Judgment. To this date, there has NEVER been any
24
25
26
27
28

1 motion filed to amend judgment, period. While I'm not asking the Court to correct that order
2 today, I did want to make the Court aware that this is a problem. Either Mr. Bellon is
3 intentionally or recklessly deceiving the Court. Coming back to the matter at hand and
4 referencing the trial video of October 09, 2014, at just 53 seconds the reasons we were in Court
5 that day were stated... Evidentiary hearing to hear testimony from the probation officer to find
6 out exactly what transacted with regards to the allegations in the opposition and countermotion
7 filed by Plaintiff in response to Defendants motion. The Order from October 09, 2014 should
8 read, Evidentiary Hearing: Testimony from Probation Officer regarding why a warrant was
9 issued for Plaintiff and the Defendants communication with the probation Department.
10 Defendants' Motion to change custody, OSC Defendant filed for Plaintiffs violation of 11/01/10
11 order, 03/08/11 order, 09/16/13 order, and Plaintiffs Opposition and Countermotion to modify
12 child support, for attorney fees and related relief. Plaintiff's counsel also ADDED things that
13 were never pronounced by the Judge. He left out specific findings but added Court notes and
14 advisements as findings instead. What follows is a full and complete breakdown of the
15 differences between what has been submitted and ordered versus what was really pronounced:
16
17
18
19

20 **Immediately below are notes, findings, and orders that were pronounced but left**
21 **completely out of the orders of October 09, 2014**
22

- 23 • The Court notes counsel had had an opportunity the day of the hearing and had met OFF
24 THE RECORD, prior to the hearing, to review CPS records (referenced in court minutes
25 then pronounced at 2 hours and 39 minutes in trial video by saying "*I didn't allow the*
26 *parties to look at them, I just allowed counsel to look at them and they were allowed to*
27 *take notes if they wanted too. That's why we were back there a little bit*")
28

- 1 • The court noted they had been thinking about the CPS reports since September 03, 2014,
2 and what they were going to do about them (pronounced in trial video at 2 hours and 43
3 minutes)
- 4 • The Court noted they were particularly concerned with the interview CPS had with
5 another daughter in the home on September 8, 2014 (pronounced in trial video at 2
6 hours 49 minutes)
- 8 • The Court notes that Plaintiff did not admit any exhibits
- 9 • The Court finds it is not concerned the investigation was unsubstantiated since CPS has
10 its own guidelines, and the Court looks at the investigation in a different light. (
11 referenced in court minutes and pronounced in trial video at 3 hours and 4 minutes)
- 13 • The Court finds an investigation was conducted with the children being interviewed by a
14 Detective and a CPS worker (pronounced in trial video at 3 hours and 4 minutes)
- 15 • The Court finds as of October, 2014, Plaintiff is out of work (pronounced in the trial
16 video at 2 hours and 1 minute)
- 18 • The minutes reflected as a finding that *"It is clear the Probation officer did not tell*
19 *Plaintiff what his requirements were when he took over the case; however it is clear..."*
20 It left the finding unfinished therefore unclear. (Referencing the trial video at 2 hours
21 and 27 minutes), the Court finishes that statement by pronouncing *"...however, it is*
22 *clear in the record that he had requirements."*
- 24 • The Court finds. *"Weston is not stressed or distressed by the current schedule. He likes*
25 *it just the way it is. Chevy had nothing to offer."* (Pronounced in the trial video at 2
26 hours and 36 minutes)

- 1 • The Court finds "*Hunting has stopped since Plaintiff can't have guns anymore*"
2 (Pronounced in the trial video at 2 hours and 37 minutes)
- 3 • The Court finds "*the kids were interviewed by CPS on the same day the Court spoke*"
4 *with them.*" (Pronounced in the trial video at 2 hours and 47 minutes)
- 5 • The Court finds the CPS reports were submitted by a mandatory reporter and not a third
6 party in Indiana as Defendant claimed (Pronounced in the trial video at 2 hours and 53
7 minutes)
- 8 • The Court made findings in support of extending Plaintiffs time. None of these findings
9 were included. "*Courts understanding, Baron and Jennifer are not working, they have*
10 *no money, I don't know what they are doing on weekends when there's no money to do*
11 *anything with, they can't even have every kid shower every day is what the CPS reports*
12 *said cause there's so many people in the house*" (Pronounced in the trial video at 3 hours
13 and 2 minutes)
- 14 • It is further ordered Mr. Bellon shall prepare the Order. Mr. Zernich shall sign off as to
15 form and content. (referenced throughout the trial video with the Court pronouncing to
16 Mr. Zernich to "*make as clear an order as possible on these different triggers here*" at 2
17 hours and 5 minutes then discussing the order further at the end of the trial video)
- 18 • The Court ordered that "*Matt has to have a reasonable basis for saying no*"
19 (Pronounced in the trial video at 2 hours and 30-31 minutes) this in regards to when
20 Defendant is asking permission from Plaintiff for the children to participate in certain
21 things.

1 Corrections to the Orders and Findings submitted by Mr. Bellon from the trial of October
2 09, 2014 below:

- 3
4
5 • The Order from October 09, 2014 states on page 1, paragraph 2, "The Court finds that
6 Plaintiff was injured in January 2014; that he immediately sought medical attention and
7 that he was unable to work after that date"...In the minutes and via the trial video at 2
8 hours and 3 minutes, the Court was very clear that its findings were based solely on
9 Plaintiff testifying to those statements. It should say "that Plaintiff *testified he was*
10 *injured ect ect...*"
- 11
12 • The Order from October 09, 2014 states on page 2, paragraph 4 "The Court further finds
13 that it has serious concerns with regard to the CPS report, involving Defendants home
14 and the information obtained in the CPS report." However that is NOT what was written
15 or pronounced by this Court. The Court found, "*it has serious concerns with regard to*
16 *the CPS report and the Court's interview with the children.*"(referenced in trial video at
17 2 hours and 57 minutes)
- 18
19 • The Order from October 09, 2014 states on page 4, paragraph 4 "It is further ordered
20 that Plaintiff is not to remove the minor children from the State of Nevada without
21 providing Defendant with an itinerary, Should he do so, this Court will enter an order
22 preventing him from taking the children out of town again." This is a very misleading
23 reconstruction of the Courts words and intentions with a very important order. This has
24 been a repeated violation and the Court made it very clear that they would not tolerate
25 the removal of the children without proper communication ever again. Referencing the
26 trial video at 2 hours and 33 minutes AND reflected quite accurately in the Court
27
28

1 minutes, the Court pronounces "*The next time Plaintiff takes the kids out of town*
2 *without notifying Jennifer of his itinerary there WILL BE a court order that he will not*
3 *ever take them out of town again, period!*"

- 4 • The Order from October 09, 2014 states on page 4, paragraph 6, "It is further ordered
5 that Defendant is not to leave the minor children in the care of her boyfriend at any time.
6 In the event that the Plaintiff can provide a credible-witness-that the Defendant has left
7 the minor children alone with her boyfriend, a change in custody would be warranted."
8 Referencing the trial video at 2 hours and 57 minutes AND closely reflected in the
9 minutes, the Court pronounces that this "*COULD be a basis for a change of custody*",
10 thus the order should modify "a change in custody would be warranted" to "could be a
11 basis for a change of custody".

- 12 • The Order from October 09, 2014 states on page 5, paragraph 6, "It is further ordered
13 that in the event Defendant would like to plan a trip with the children, she is to provide
14 Plaintiff with two weeks notice that she wants the children for a weekend. Defendant
15 may do this up to four times per year if she is engaged in a special activity with the
16 children which will give her eight weekends per year total. The rest of the weekends
17 shall be spent with Plaintiff." Referencing in the trial video at 3 hours and 3 minutes the
18 Court never says the activity has to be a "*special*" activity but states the Defendant has
19 to give notice if she is planning on doing something with the children.

- 20 • The Order from October 09, 2014 states on page 7, paragraph 5, "It is further ordered
21 that Plaintiff will provide Defendant with a copy of his first paycheck stub so that his
22 child support can be recalculated. In the event that Plaintiff fails to do so, he will be in
23 contempt of this Court's orders which is punishable by five days in jail." Referencing
24
25
26
27
28

1 the trial video at 2 hours and 4 minutes, the Judge pronounces " *this is a self effecting*
2 *order. If you fail to do so, you are in contempt! Failure to do so is contempt, period,*
3 *punishable by 5 days in jail.* " The Order filed leaves a whole different interpretation.

- 4 • The Order from October 09, 2014 states on page 8, paragraph 4, "It is further ordered
5 that this is a permanent order by this court sui sponte and is based on the childrens
6 interviews, which were supported by the CPS record," Referencing the end of the trial
7 video AND reflecting the Court's minutes the Judge stated "...*this is a permanent order*
8 *by this court sui sponte and is based on the childrens interviews, which were supported*
9 *by the CPS record, as far as the Court is concerned.* "

12
13 **Findings submitted and ordered that were not findings, but court notes or**
14 **advisements:**

- 15
16
17 • The Order from October 09, 2014 states " The Court further finds that this Court
18 Ordered in 2011 that defendants boyfriend was not to discipline Weston and
19 Chevy in any way. Defendant advised that Weston was not punished by being
20 punched." Again, this was not a finding, it was a court note.
- 21 • The Order from October 09, 2014 states "The Court further finds that the CPS
22 records reveal that the minor children were consistent with regard to physical
23 punishment in Defendant's house". This again, was not a finding but notes the
24 Court was making while speaking with Defendant. (2 hours and 39 minutes in
25 the trial video are detailed discussions)
26
27
28

- 1 • The Order from October 09, 2014 states “ The Court further finds that the CPS
2 worker and the detective both believed when they interviewed another child
3 from the residence the child had been coached.” This was once again, a note
4 made by the court as they read from the CPS reports, not a finding. The Courts
5 pronouncement was “*that all the children had been coached*”, thus the order
6 should modify “the child had been coached” to “that all the children had been
7 coached.” (pronounced at 2 hours and 40 minutes in trial video)
8
- 9 • The Order from October 09, 2014 states “ The Court further finds that it had
10 been ready to change physical custody this date based on the child interview and
11 the CPS report where the same information was provided to the CPS
12 investigator.” This was a comment directly spoken to the Defendant, not a
13 finding, and should be removed.
14
- 15 • The Order from October 09, 2014 states “ The Court further finds that Defendant
16 denies any allegation of abuse in her home, but the Court was bound to protect
17 the minor children if Defendant was unable to protect them.” Court notes, not
18 findings, and should be removed. (all referenced around 2 hours and 40 minutes
19 in trial video)
20
21

22 The Order from October 09, 2014 states “ that despite its previous order from 2011
23 Weston continued to wrestle and Defendants boyfriend continued to discipline the minor
24 child.” Again, court notes not findings. The first note being completely incorrect, but
25 understandably, given the extreme length and history of this case. Pursuant to Rule 52(a) the
26 claim that Defendant continued to have the children wrestle despite previous court orders from
27 2011, shows how overwhelmed the honorable Judge Nathan must have been with the
28

1 workload in this case. Understandably so, considering this case has been before the Court
2 around 20 different times now and multiple orders have been made over the course of 4 years
3 now. To clarify and correct what the court believed to be true when stating Defendant had
4 disobeyed her order to not have Weston wrestle, the Court had made orders since 2011
5 permitting him to wrestle. Order filed in minutes from November 07, 2013. "If there are any
6 scheduled wrestling tournaments for the children while they are in fathers custody, father is to
7 make sure they get there." Here is another one, Order filed February 11, 2014. "If the children
8 have WRESTLING clinics on dad's time, dad shall pick up the children after the clinics are
9 done." Then at the hearing on May 1, 2014 Judge Nathan requested that a letter be obtained
10 from Margaret Pickard specifically about Weston's wrestling schedule. The letter from
11 Margaret Pickard was obtained and filed on June 27, 2014. All of those recent orders and
12 correspondence, yet so much confusion at the time of the hearing on October 09, 2014. That
13 makes those specific court notes(that were submitted and ordered as findings), what the law
14 would call, "erroneous", respectfully speaking.
15
16
17

18 FINDINGS BY THE COURT; JUDGMENT ON PARTIAL FINDINGS

19 52. RULE(a)

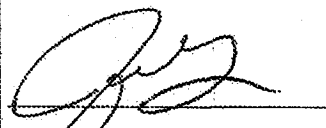
20 Effect. (a) In all actions tried upon the facts without a jury or with an
21 advisory jury, the court shall find the facts specially and state separately its
22 conclusions of law thereon and judgment shall be entered pursuant to Rule 58;
23 and in granting or refusing interlocutory injunctions the court shall similarly set
24 forth the findings of fact and conclusions of law which constitute the grounds
25 of its action. Requests for findings are not necessary for purposes of review.
26 Findings of fact shall not be set aside unless clearly erroneous, and due
27 regard shall be given to the opportunity of the trial court to judge the credibility
28 of the witnesses. The findings of a master, to the extent that the court adopts
them, shall be considered as the findings of the court. It will be sufficient if the
findings of fact and conclusions of law are stated orally and recorded in open
court following the close of the evidence or appear in an opinion or
memorandum of decision filed by the court. Findings of fact and conclusions
of law are unnecessary on decisions of motions under Rules 12 or 56 or any
other motion except as provided in subdivision (c) of this rule. But an order
granting summary judgment shall set forth the undisputed material facts and
legal determinations on which the court granted summary judgment.

1 NRCP 52(a) (**Emphasis Added**). Therefore considering that much of what Mr. Bellon
2 submitted is "erroneous" and that even Judge Nathan forgot her previous orders and made
3 findings that were "erroneous; the previous Order from October 09, 2014 entered and filed on
4 March 20, 2015, should be "set aside".
5

6 I, Jennifer Gordon, Defendant in proper person, do respectfully request that the
7 conformed order I have provided as Exhibit E, which has been approved and signed by
8 ZERNICH LAW OFFICE, be entered as the proper judgment:
9

10 Dated this 1 day of May, 2015.
11

12
13 Respectfully submitted by:

14
15 
16

17 JENNIFER GORDON
18 91 Autumn Day Street
19 Henderson, Nevada 89012
20 (702) 234-9673
21 Elise433@gmail.com
22 Defendant in Proper Person
23
24
25
26
27
28

EXHIBIT "A"

Dawn Tranquillo <DAT@bellonandmaningo.com>
To: "gzernich@zernichlaw.com" <gzernich@zernichlaw.com>
Cc: "kperri@zernichlaw.com" <kperri@zernichlaw.com>
Geiger v. Gordon Order

November 4, 2014 1:32 PM

2 Attachments, 743 KB

Mr. Zernich, attached hereto is the proposed Order from our hearing on October 9, 2014 in the above-referenced matter. Please let us know if it meets with your approval and we will forward the original to you for your signature. Should you have any questions or require any changes, please do not hesitate to contact our office.

Dawn Tranquillo



DAWN A. TRANQUILLO
Bellon & Maningo, Ltd.
732 S. Sixth Street, Suite 102
Las Vegas, NV 89101
702-452-6299
702-452-6298, fax
www.bellonandmaningo.com
dat@bellonandmaningo.com

[Geiger_order.pdf \(739 KB\)](#)

ORD
BELLON & MANINGO, LTD.
PETER J. BELLON, ESQ.
Nevada Bar No. 004528
732 South Sixth Street, Suite 102
Las Vegas, Nevada 89101
admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,
Plaintiff,
vs.
JENNIFER ELISE GORDON,
Defendant

Case No.: D-10-430639-D
Dept. No.: "T"
FAMILY COURT

ORDER

This matter having come before this Court on the 9th day of October, 2014 for an Evidentiary Hearing; Plaintiff, MATTHEW ROBERT GEIGER, appearing in person and through his attorney, PETER J. BELLON, ESQ., of BELLON & MANINGO, LTD., and Defendant, JENNIFER ELISE GORDON, appearing in person and through her attorney, GARY ZERNICH, ESQ., in an unbundled capacity; the Court having heard testimony and good cause appearing;

This Court finds that Plaintiff was injured in January 2014; that he immediately sought medical attention and that he was unable to work after that date;

1 This Court further finds that Plaintiff received disability
2 benefits through April 2014.

3 This Court further finds that Plaintiff's disability was
4 challenged and as a result his benefits were terminated;
5

6 This Court further finds that Plaintiff is challenging this
7 decision;

8 This Court further finds that Plaintiff had a warrant out for
9 his arrest. However, it was clear from the evidence that the
10 Probation Officer who took over Plaintiff's case did not have a
11 conversation with Plaintiff explaining what his new requirements
12 were;
13

14 The Court further finds that it has serious concerns with
15 regard to the CPS Report involving Defendant's home and the
16 information obtained from the child interview;

17 The Court further finds that it believes the minor child
18 Weston when he stated that Defendant's boyfriend is punching him
19 in the stomach and arms;

20 The Court further finds that despite its previous order from
21 2011 Weston continued to wrestle and Defendant's boyfriend
22 continued to discipline the minor child;

23 The Court further finds that the CPS records reveal that the
24 minor children were consistent with regard to physical punishment
25 in Defendant's house;
26

27 The Court further finds that it had been ready to change
28 physical custody this date based on the child interview and the

1 CPS report where the same information was provided to the CPS
2 Investigator;

3
4 The Court further finds that Defendant denies any allegation
5 of abuse in her home, but that this Court was bound to protect the
6 minor children if Defendant was unable to protect them.

7 IT IS HEREBY ORDERED that Defendant's request for sole legal
8 custody of the parties' two (2) minor children is denied and that
9 Finding of Facts and Conclusion of Law to this aspect of the
10 decision are waived by counsel.

11 IT IS FURTHER ORDERED that based on the parties' continuing
12 failure to effectively communicate, if Defendant contacts
13 Plaintiff with a reasonable request and he himself does not
14 respond by e-mail or text within forty-eight (48) hours she has
15 permission to go ahead with what she requested. Plaintiff cannot
16 rely on his wife to communicate with Defendant. He needs to
17 respond to Defendant himself.

18
19 IT IS FURTHER ORDERED that if Plaintiff does respond and the
20 parties do not agree on Defendant's request, she does not have
21 permission to proceed.

22 IT IS FURTHER ORDERED that Weston is involved in the school
23 band and if the band goes out of town during Plaintiff's time,
24 Weston will be allowed to go.

25
26 IT IS FURTHER ORDERED that Defendant shall inform Plaintiff
27 of any appointments she makes for the minor children the same day
28 they are made. Defendant shall not wait until the day of the

1 appointment to advise Plaintiff of same. Additionally, Plaintiff
2 may not change the children's appointments once they have been set
3 by Defendant.
4

5 IT IS FURTHER ORDERED that Plaintiff is not to remove the
6 minor children from the State of Nevada without providing
7 Defendant with an itinerary. Should he do so, this Court will
8 enter an Order preventing him from taking the children out of
9 state again.

10 IT IS FURTHER ORDERED that while Plaintiff is on probation,
11 he must provide Defendant with proof he has permission to travel
12 out of State.
13

14 IT IS FURTHER ORDERED that Defendant is not to leave the
15 minor children in the care of her boyfriend at any time. In the
16 event that Plaintiff can provide a credible witness that Defendant
17 has left the minor children alone with her boyfriend, a change in
18 custody would be warranted.

19 IT IS FURTHER ORDERED that Defendant's boyfriend shall not
20 discipline the minor children at any time for any reason nor shall
21 he or Defendant use any object on the children as a form of
22 discipline.
23

24 IT IS FURTHER ORDERED that both of the parties shall take the
25 ABC's of Parenting to learn how to better discipline their
26 children within the next sixty (60) days. The Court also believes
27 that it would be a good idea for Defendant's boyfriend "Matzi" to
28 also take the class.

1 IT IS FURTHER ORDERED that Plaintiff has permission to have
2 an unemotional discussion with the minor children about telling
3 someone at their school if they feel there are being abused or
4 physically hurt.
5

6 IT IS FURTHER ORDERED that Plaintiff shall have a safety word
7 with the children that they can use during telephone conversations
8 to let Plaintiff know they are in trouble and need assistance.

9 IT IS FURTHER ORDERED that Plaintiff's visitation with the
10 minor children shall be extended to include the first four (4)
11 weekends of each month, beginning on Friday at 6:00 p.m. and
12 continuing until Sunday at 6:00 p.m. Defendant shall have the
13 minor children during the fifth weekend (where applicable).
14

15 IT IS FURTHER ORDERED that in the event Defendant would like
16 to plan a trip with the children, she is to provide Plaintiff with
17 two (2) weeks notice that she wants the children for a weekend.
18 Defendant may do this up to four (4) times per year if she is
19 engaged in a special activity with the children that weekend,
20 which will give her eight (8) weekends per year total. The rest
21 of the weekends shall be spent with Plaintiff.

22 IT IS FURTHER ORDERED that the parties have been advised:
23 PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT OR
24 DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A
25 CATEGORY D FELONY AS PROVIDED IN NRS 193.130. NRS 200.359
26 provides that every person having a limited right of custody to a
27 child or any parent having no right of custody to the child who
28

1 willfully detains, conceals or removes the child a parent,
2 guardian or other person having lawful custody or a right to
3 visitation of the child in violation of an order of this court, or
4 removes the child from the jurisdiction of the court without
5 consent of either the court or all persons who have the right to
6 custody or visitation is subject to being punished for a category
7 D felony as provided in NRS 193.130.
8

9 **IT IS FURTHER ORDERED** that pursuant to NRS 125C.200 the
10 parties have been advised that should the custodial parent intend
11 to move his/her residence to a place outside the state and take
12 the minor children with him/her, he/she must, obtain written
13 consent of the other parent to move the children from the State.
14 Should the non-custodial parent refuse to give that consent, the
15 parent planning the move shall, before he/she leaves the state
16 with the children, petition the court for permission to move the
17 children. Failure of a parent to comply with the provisions of
18 this section may be considered as a factor if a change of custody
19 is requested by the noncustodial parent.
20

21 **IT IS FURTHER ORDERED** that pursuant to NRS 125.510 and NRS
22 125A.290 that the parties have been advised that the terms of the
23 Hague Convention of October 25, 1980 shall apply if a parent
24 abducts or wrongfully retains a child in a foreign country; and
25 that for the purposes of applying the terms of the Hague
26 Convention, the United States, State of Nevada is the child's
27 habitual residence.
28

1 IT IS FURTHER ORDERED that Plaintiff is in arrears with
2 regard to his child support obligation in the amount of \$28,879.69
3 through August 2014. Said amount is herein reduced to Judgment
4 and includes all interest and penalties.
5

6 IT IS FURTHER ORDERED Plaintiff's child support obligation
7 shall be temporarily reduced to \$200.00 per month (\$100.00 per
8 child, per month).

9 IT IS FURTHER ORDERED that this Court does not find that
10 Plaintiff is in contempt of court at this time with regard to his
11 child support payments for not being able to work. However,
12 Plaintiff is under an affirmative duty to notify Defendant when he
13 is cleared for work and is employed again.
14

15 IT IS FURTHER ORDERED that Plaintiff will provide Defendant
16 with a copy of his first paycheck stub so that his child support
17 can be recalculated. In the event that Plaintiff fails to do so,
18 he will be in contempt of this Court's order which is punishable
19 by five (5) days in jail.

20 IT IS FURTHER ORDERED that if Plaintiff's disability benefits
21 are reinstated, his child support will be set at twenty-five
22 percent (25%) of his disability. Plaintiff is under an
23 affirmative duty to notify Defendant if or when his benefits are
24 reinstated.
25

26 IT IS FURTHER ORDERED that both parties have been advised
27 that each person who is subject to an order for the support of a
28 minor child may request a review of said order every three years.

1 IT IS FURTHER ORDERED that Plaintiff has been advised that he
2 is subject to the withholding of wages and commissions for
3 delinquent payments of support pursuant to N.R.S. 31A.010, et seq.

4
5 IT IS FURTHER ORDERED that this is a permanent Order by this
6 Court sui sponte and is based on the children's interviews, which
7 were supported by CPS records.

8 DATED this ____ day of October 2014.

9
10
11 DISTRICT COURT JUDGE, Family Division

12 BELLON & MANINGO, LTD.

13
14
15 By: _____

16 PETER J. BELLON, ESQ.
17 Nevada Bar No. 004528
18 732 South Sixth Street, Suite 102
19 Las Vegas, Nevada 89101
20 admin@bellonandmaningo.com
21 Phone: 702/452-6299
22 Fax: 702/452-6298
23 Attorney for Plaintiff

24 Approved as to Form and Content:

25 ZERNICH LAW OFFICES

26
27 By: _____

28 GARY M. ZERNICH, ESQ.
Nevada State Bar #004528
600 Whitney Ranch Drive, #A-5A
Henderson, Nevada 89014
Phone: (702) 616-9838
Fax: (702) 616-9057
Attorney for Defendant

EXHIBIT "B"

Gary Zernich <gzernich@zernichlaw.com>

November 5, 2014 11:09 AM

To: Peter J. Bellon, Esq. <pjb@bellonandmaningo.com>

Gieger v Gordon proposed order

November 5, 2014

Dear Peter:

I am in receipt of your proposed order in the Gieger v. Gordon case in Department T. Please do not submit it without my signature, and so you know I have a lot of suggested revisions. I will get them to you in the next 3 or 4 days, and maybe even today, but it would be a lot easier if you would send me your proposed order by email attachment and in a Word (.doc, or docx) format so I can use the "track changes" feature and you can more readily see my proposed revisions.

Gary Zernich

EXHIBIT "C"

Gary Zernich <gzernich@zernichlaw.com>

November 21, 2014 3:23 PM

To: pjb@bellonandmaningo.com

Geiger v. Gordon proposed order



1 Attachment, 101 KB

November 21, 2014

Via email only:

Peter J. Bellon, Esq.

re: Geiger v. Gordon

Proposed Order from the hearing on October 9, 2014

Dear Mr. Bellon:

After reviewing your proposed order and contemplating many different times on how to best suggest my proposed revisions, I decided that in this case it would be best to just reprint the Court's minutes as a proposed order to the Court. I think that your proposed order picks and chooses findings and other Court notes, and misinterprets some of them. I also think that any suggested order that I might make that I might get a letter from you that is very similar to this one that I am sending you. In my opinion, because the oral pronouncements were very long and presented in a manner that was confusing, at least to me, that it would be best to just submit the minutes otherwise we might jostle back and forth over each of our desired language, and/or spend hours reaching an agreement, and/or not reach an agreement at all even after hours of trying.

Anyway, please let me know what you think and then we can figure out how to proceed. Maybe in this case it might be best if we each just submit our own proposed order to the court, but I think the Court otherwise prefers our mutual agreement.

Sincerely,
Gary Zernich



2014-11-2...pdf (101 KB)

EXHIBIT "D"

Peter Bellon <PJB@bellonandmaningo.com>
To: 'Gary Zernich' <gzernich@zernichlaw.com>
Cc: Dawn Tranquillo <DAT@bellonandmaningo.com>
RE: Geiger v. Gordon proposed order

November 25, 2014 5:27 PM

Gary

Thank you for your follow up. Let me take a look at the order and the minutes again and see if there is a mutual solution. I am not trying to be selective and would be glad to add any findings that you want as well, I just want to make sure we preserve the record as this is something that is more than likely coming back before the court sometime in the future.

Let's not worry about it until after the Thanksgiving break.

Thanks

Peter

-----Original Message-----

From: Gary Zernich [mailto:gzernich@zernichlaw.com]
Sent: Friday, November 21, 2014 3:24 PM
To: Peter Bellon
Subject: Geiger v. Gordon proposed order

November 21, 2014

Via email only:
Peter J. Bellon, Esq.

re: Geiger v. Gordon
Proposed Order from the hearing on October 9, 2014

Dear Mr. Bellon:

After reviewing your proposed order and contemplating many different times on how to best suggest my proposed revisions, I decided that in this case it would be best to just reprint the Court's minutes as a proposed order to the Court. I think that your proposed order picks and chooses findings and other Court notes, and misinterprets some of them. I also think that any suggested order that I might make that I might get a letter from you that is very similar to this one that I am sending you. In my opinion, because the oral pronouncements were very long and presented in a manner that was confusing, at least to me, that it would be best to just submit the minutes otherwise we might jostle back and forth over each of our desired language, and/or spend hours reaching an agreement, and/or not reach an agreement at all even after hours of trying.

Anyway, please let me know what you think and then we can figure out how to proceed. Maybe in this case it might be best if we each just submit our own proposed order to the court, but I think the Court otherwise prefers our mutual agreement.

Sincerely,
Gary Zernich

EXHIBIT "E"

CHINA

MATTHEW GEIGER

CASE NO. D-10-430639-D
DEPT. NO. T

JENNIFER GORDON.

Defendant.

This matter having come on for AN EVIDENTIARY HEARING TO HEAR TESTIMONY FROM PLAINTIFF'S PROBATION OFFICER REGARDING WHY A WARRANT WAS ISSUED FOR PLAINTIFF, AND THE DEFENDANTS COMMUNICATION WITH THE PROBATION DEPARTMENT, DEFENDANT'S MOTION TO CHANGE CUSTODY, ORDER TO SHOW CAUSE DEFENDANT FILED FOR PLAINTIFF'S VIOLATION OF 11/01/10 ORDER, 03/08/11 ORDER, 09/16/13 ORDER, AND PLAINTIFF'S OPPOSITION AND COUNTERMOTION TO MODIFY CHILD SUPPORT, FOR ATTORNEY FEES AND RELATED RELIEF. On the above-referenced date in the Family Division, Department T, of the Eighth Judicial District Court, County of Clark, and the Defendant, JENNIFER GORDON, being present and represented by and through attorney GARY M. ZERNICH, ESQ. of the ZERNICH LAW OFFICE, in an unbundled capacity, and Plaintiff, MATTHEW GEIGER, being present and represented by and through attorney PETER J. BELLON, ESQ., and the

1 Court being fully advised in the premises, both as to the subject matter as well as the parties
2 thereto, and that jurisdiction is proper, and good cause appearing:

3
4 **THE COURT NOTED** as follows:

- 5 • Counsel had had an opportunity the day of the hearing and had met OFF THE RECORD,
6 prior to the hearing, to review CPS records
7 • The Court had been thinking about the CPS reports since September 03, 2014, and what
8 they were going to do about them
9 • The Court was particularly concerned with the interview CPS had with another daughter
10 in the home on September 08, 2014
11 • The Court ordered in 2011 that defendant's boyfriend was not to discipline Weston and
12 Chevy in any way.
13 • Defendant advised Weston was not being punished by being punched
14 • The minor children were consistent with what they said in the CPS reports with regard to
15 physical punishment in Defendant's home.
16 • The CPS worker and Detective both believed when they interviewed another child from
17 the residence that ALL the children had been coached.
18 • Plaintiff did not admit any exhibits

19
20 **THE COURT FINDS** as follows:

- 21 • As of October 2014, Plaintiff is out of work.
22 • Plaintiff testified he was injured in January 2014; that he immediately sought
23 medical attention, and that he was unable to work after that date.
24 • Plaintiff received disability benefits through April 2014.
25 • Plaintiff's disability was challenged and as a result his benefits were terminated.
26 • Plaintiff is challenging this decision.
27 • Plaintiff had a warrant out for his arrest.
28 • It is clear the Probation Officer did not tell Plaintiff what his new requirements
were when he took over the case, however, it is clear in the record, that he had
requirements.
• It would have been helpful if Defendant had called Plaintiff and advised him he
had an outstanding warrant.
• Hunting has stopped since Plaintiff can't have guns anymore.
• Weston is not stressed or distressed by the current schedule. He likes it the way it
is. Chevy had nothing to offer.

- 1 • The kids were interviewed by CPS on the same day the Court spoke with them.
- 2 • The CPS reports were submitted by a mandatory reporter and not a third party in
- 3 Indiana as the Defendant claimed.
- 4 • It believes the minor child Weston when he stated that Defendant's boyfriend is
- 5 punching him in the stomach and arms.
- 6 • It has serious concerns with regard to the CPS report and the Court's interview
- 7 with the children.
- 8 • That despite its previous order from 2011, Defendant's boyfriend continued to
- 9 discipline the minor child.
- 10 • Based off the Court's understanding of the CPS report, Baron and Jennifer are not
- 11 working, they have no money, the Court does not know what they are doing on
- 12 the weekends when there's no money to do anything with, they can't even have
- 13 every kid shower every day; because there's so many people in the house.
- 14 • An investigation was conducted with the children being interviewed by a
- 15 Detective and a CPS worker.
- 16 • It is not concerned the investigation was unsubstantiated since CPS has its own
- 17 guidelines, and the Court looks at the investigation in a different light.

18 **THE COURT ORDERED, ADJUDGED AND DECREED** as follows:

- 19 • Defendant's request for sole legal custody of the parties' two (2) minor children is
- 20 denied and that Findings of Fact and Conclusion of Law to this aspect of the
- 21 decision are waived by counsel.
- 22 • Based on the parties' continuing failure to effectively communicate, if Defendant
- 23 contacts Plaintiff with a request and he himself does not respond by e-mail or text
- 24 within forty-eight (48) hours she has permission to go ahead with what she
- 25 requested. Plaintiff cannot rely on his wife to communicate with Defendant. He
- 26 needs to respond to Defendant himself.
- 27 • If Plaintiff does respond and the parties do not agree on Defendant's request she
- 28 does not have permission to proceed, but he must give a reasonable basis for
- saying no.
- Weston is involved in the school band and if the band goes out of town during
- Plaintiff's time, Weston will be allowed to go.
- Defendant shall inform Plaintiff of any appointments she makes for the minor
- children the same day they are made. Defendant shall not wait until the day of the
- appointment to advise Plaintiff of same. Additionally, Plaintiff may not change
- the children's appointments once they have been set by Defendant.

- 1 • The next time the Plaintiff takes the kids out of town without notifying Jennifer of
- 2 his itinerary there WILL BE a court order that he will not ever take them out of
- 3 town again, period.
- 4 • While Plaintiff is on probation, he must provide Defendant with proof from his
- 5 probation officer that he has permission to travel out of state.
- 6 • Defendant is not to leave the minor children in the care of her boyfriend at any
- 7 time. In the event that Plaintiff can provide a credible witness that Defendant has
- 8 left the minor children alone with her boyfriend, this could be a basis for a change
- 9 of custody.
- 10 • Defendant's boyfriend shall not discipline the minor children at any time for any
- 11 reason nor shall he or the Defendant use any object on the children as a form of
- 12 discipline.
- 13 • Both parties' shall take the ABC's of Parenting to learn how to better discipline
- 14 their children within the next sixty (60) days. The Court also believes it would be
- 15 a good idea for Defendant's boyfriend "Matzi" to also take the class.
- 16 • Plaintiff has permission to have an unemotional discussion with the minor
- 17 children about telling someone at their school if they feel they are being abused or
- 18 physically hurt.
- 19 • Plaintiff shall have a safety word with the children that they can use during
- 20 telephone conversations to let Plaintiff know they are in trouble and need
- 21 assistance.
- 22 • Plaintiff's visitation with the minor children shall be extended to include the first
- 23 four (4) weekends of each month, beginning on Friday at 6:00 p.m. and
- 24 continuing until Sunday at 6:00 p.m. Defendant shall have the minor children
- 25 during the fifth weekend(where applicable).
- 26 • In the event Defendant would like to plan a trip with the children, she is to
- 27 provide Plaintiff with two (2) weeks notice that she wants the children for a
- 28 weekend. Defendant may do this up to four (4) times per year if she is planning
- on doing something with the children which will give her eight (8) weekends per
- year total. The rest of the weekends shall be spent with Plaintiff.
- Plaintiff is in arrears with regard to his child support obligation in the amount of
- \$28, 879.69 through August 2014. Said amount is herein reduced to judgment
- and includes all interest and penalties.
- Plaintiff's child support shall be temporarily reduced to \$200.00 per month
- (\$100.00 per child, per month)
- Plaintiff is not in contempt of court at this time with regard to his child support
- payments for not being able to work. However, Plaintiff is under an affirmative
- duty to notify Defendant when he is cleared for work and is employed again.

- 1 • Plaintiff will provide Defendant with a copy of his first paycheck stub so that his
- 2 child support can be recalculated. This is a self effecting order. If he fails to do
- 3 so, he is in contempt, period, punishable by five (5) days in jail.
- 4 • If Plaintiff's disability benefits are reinstated, his child support will be set at
- 5 twenty-five percent (25%) of his disability. Plaintiff is under an affirmative duty
- 6 to notify Defendant if or when his benefits are reinstated.
- 7 • Both parties have been advised that each person who is subject to an order for the
- 8 support of a minor child may request a review of said order every three (3) years.
- 9 • Plaintiff has been advised that he is subject to the withholding of wages and
- 10 commissions for delinquent payments of support pursuant to N.R.S. 31A. 010m et
- 11 seq.
- 12 • This is a permanent order by this court sui sponte and is based on the children's
- 13 interviews, which were supported by the CPS record as far as the Court is
- 14 concerned.
- 15 • Mr. Bellon shall prepare the order. Mr. Zernich shall sign off as to form and
- 16 content.
- 17 • Pursuant to **NRS 200.359** the parties have been advised: Detention, concealment
- 18 or removal of child from person having lawful custody or from jurisdiction of
- 19 court: Penalties; limitation on issuance of arrest warrant; restitution; exceptions.
- 20 1. A person having a limited right of custody to a child by operation of law or
- 21 pursuant to an order, judgment or decree of any court, including a judgment or
- 22 decree which grants another person rights to custody or visitation of the child, or
- 23 any parent having no right of custody to the child, who: (a) In violation of an
- 24 order, judgment or decree of any court willfully detains, conceals or removes the
- 25 child from a parent, guardian or other person having lawful custody or a right of
- 26 visitation of the child; or(b) In the case of an order, judgment or decree of any
- 27 court that does not specify when the right to physical custody or visitation is to be
- 28 exercised, 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
- guilty of a category D felony and shall be punished as provided in NRS 193.130.
- Pursuant to **NRS 125C.200** the parties have been advised Consent required from
- noncustodial parent to remove child from State; permission from court; change of
- custody. If custody has been established and the custodial parent intends to move
- his or her residence to a place outside of this State and to take the child with him
- or her, the custodial parent 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 leaving 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.

- 1 • Pursuant to **NRS 125.510** and **NRS 125A.290** the parties have been advised that
2 the terms of the Hague Convention of October 25, 1980 shall apply if a parent
3 abducts or wrongfully retains a child in a foreign country; and that for the
4 purposes of applying the terms of the Hague Convention, the United States, State
5 of Nevada is the child's habitual residence.

6 Dated this _____ day of May, 2015.

7
8
9
10 _____
11 **DISTRICT COURT JUDGE**

12
13 Respectfully submitted by:

14 ZERNICH LAW OFFICE

15 

16 **GARY M. ZERNICH, ESQ.**

17 Nevada Bar No. 7963

18 **KRISTOFER J. SNOW, ESQ.** ✓

19 Nevada Bar No. 13253

20 600 Whitney Ranch Drive, Ste. A-5A

21 Henderson, Nevada 89014

22 (702) 616-9838

23 Unbundled Attorney for Defendant
24
25
26
27
28

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Matthew Geiger
Plaintiff/Petitioner
-vs-
Jennifer Gordon
Defendant/Respondent

CASE NO. D: 10 430639 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: CONFORM ORDER FROM OCTOBER 09, 2014
TO COURTS MINUTES AND JUDGES ORAL PRONOUNCEMENTS

Motions and Oppositions
to Motions filed after
entry of final Decree or
Judgment 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 is 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: May 1, 2015

Jennifer Gordon

Printed Name - GN



ERROR: undefined
OFFENDING COMMAND:

STACK: