

IN THE SUPREME COURT OF THE STATE OF NEVADA

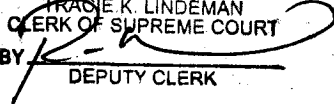
JENNIFER ELISE GORDON,
Appellant,
vs.
MATTHEW ROBERT GEIGER,
Respondent.

Supreme Court No. 67955
District Court No. D430639
Due Date: August 31, 2015

FILED

AUG 31 2015

CIVIL PROPER PERSON APPEAL STATEMENT

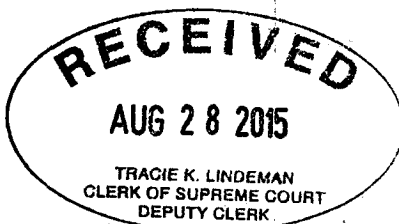
TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY  DEPUTY CLERK

Jennifer Elise Gordon
91 Autumn Day St.
Henderson NV 89012

Peter J. Bellon
Bellon & Maningo, Ltd.
732 S. 6th St., Ste. 102
Las Vegas, NV 89101-6927

Appellant in Proper Person

Respondent:
Matthew Robert Geiger



Judgment or Order You Are Appealing. List the judgment or order that you are appealing from and the date that the judgment or order was filed in the district court.

Filed Date	Name of Judgment or Order
03/20/2015	Order (from the hearing of 10/09/2014)
04/09/2015	Order (from the hearing of 03/24/2015)

Notice of Appeal. Give the date you filed your notice of appeal in the district court: 05/05/2015

Related Cases. List all other court cases related to this case. Provide the case number, title of the case and name of the court where the case was filed.

Case No.	Case Title	Name of Court
D-10-430639-D	Geiger, Plaintiff vs. Gordon, Defendant	Eighth Judicial District Court, Family Divisi

Issues on Appeal. Does your appeal concern any of the following issues? Check all that apply:

- | | | |
|---|--|---|
| <input type="checkbox"/> divorce | <input checked="" type="checkbox"/> child custody/visitation | <input checked="" type="checkbox"/> child support |
| <input type="checkbox"/> relocation | <input type="checkbox"/> termination of parental rights | <input type="checkbox"/> attorney fees |
| <input type="checkbox"/> paternity | <input type="checkbox"/> marital settlement agreement | <input type="checkbox"/> division of property |
| <input type="checkbox"/> adoption | <input type="checkbox"/> prenuptial agreement | <input type="checkbox"/> spousal support |
| <input type="checkbox"/> other—briefly explain: _____ | | |

Statement of Facts. Explain the facts of your case. (Your answer must be provided in the space allowed.)

On 08/04/2014 Appellant filed a Motion to Modify Child Custody, Visitation, and/or Child Support and Orders to Show Cause for Respondent's violations of 11/01/2010 Order, 03/08/2011 Order, and 09/16/13 Order. Due to the circumstances Appellant also filed an Ex Parte Motion for Order Shortening Time. On 08/28/2014 the Appellant showed up to Court with all the requested documents pertaining to her Motions. Partial arguments were heard regarding the Motions and several Orders were made against Respondent with regards to Appellant's Motions that day. However, Respondent had filed an Opposition and

Counter motion only on 08/25/2014 and Appellant had only received the Opposition and Counter motion the night before the hearing via email so the Honorable Gayle Nathan continued the Motion portion of the hearing to a later date to give time for the Appellant to write a Reply. Because of the allegations in the Opposition and Counter motion Judge Nathan decided to set an evidentiary hearing at the same time as the continued Motion hearing in order to hear testimony from the probation officer at the center of the allegations. A child interview was also requested at the same time. The child interview was set for September 03, 2014 and the evidentiary hearing for October 03, 2014. However, on September 25, 2014 the Court rescheduled the hearing for October 09, 2014. The evidentiary portion of the hearing was only for the probation officers testimony and the Orders to Show Cause filed by Appellant. Everything else had been continued to be heard the same day. When Appellant's counsel requested the child interview from the District Court, he was denied. On October 09, 2014, prior to the hearing, the attorney's met off the record with the Judge who presented evidence that was not available to the parties before the date and time of the hearing. The new evidence presented by the Judge was concerning CPS records that the Judge had obtained without any parties knowledge. This evidence was material to the Judge's decision on the date and the time of the hearing. It should be noted that the child interview was still not made available to Appellant or Appellant's counsel. Appellant came with substantial amounts of evidence pertaining to her Motions and all of the Respondent's allegations but none of it was heard or even allowed testimony. Respondent was ordered to file and bring documents supporting his case, specifically medical records and drug tests results but he provided none of the requested documents nor did he provide anything to substantiate his allegations. Appellant's counsel even asked the courts to enforce their orders for Respondents previous contempts but the court denied those requests. Appellant's counsel asked for a continuance so all testimony and evidence could be given but was denied. The Judge specifically stated that she had been thinking about the CPS reports since September 3 and what she was going to do about it yet never shared that information with the parties. Nor did

the Judge ever contact CPS to ask them about the reports, which were unsubstantiated for multiple reasons. All the information the Judge had obtained has still to this day not been shared with the parties. The CPS case worker, Allison Davis, would have gladly testified or spoken with courts if any request had been made. Appellant later filed a Motion for Reconsideration et al. after waiting for 5 months for the judgment to be entered, which was also denied. Appellant then filed a Motion to Conform the Order for it's many added errors but that was also denied.

Statement of District Court Error. Explain why you believe the district court was wrong. Also state what action you want the Nevada Supreme Court to take. (Your answer must be provided in the space allowed).

Appellant believes the district court erred when it violated Appellant's due process rights when the Court sua sponte introduced for the first time documentary evidence to the litigants at the start of a evidentiary hearing leaving the litigants no time to prepare for the validity, veracity, or credibility of the evidence, over the objection of the Appellant and a request for a continuance.

Appellant believes the district court erred when it expanded the scope of an evidentiary hearing, i.e. turning a motion hearing into an evidentiary hearing on the day of the motion hearing that was being held in conjunction with a limited scope evidentiary hearing, without prior notice to the litigants.

Appellant also believes the district court erred when it changed the Appellant's custodial rights, i.e. gave the Respondent more visitation time and made a ruling that the Appellant's fiance was not allowed around the subject minor children unsupervised even though Appellant and her fiance have a child together and live together, all without a full and fair hearing.

Appellant believes the district court erred when it made erroneous findings, regarding the minor child Weston wrestling, admonishing the Appellant for breaking the orders to not have him in wrestling when the court had since changed those orders not only allowing the child to wrestle but ordering the Respondent that he needed to comply with

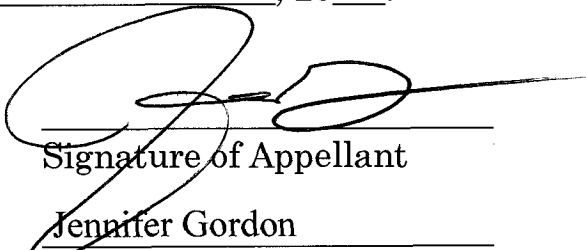
CERTIFICATE OF SERVICE

I certify that on the date indicated below, I served a copy of this completed appeal statement upon all parties to the appeal as follows:

- ☐ By personally serving it upon him/her; or
- ☒ By mailing it by first class mail with sufficient postage prepaid to the following address(es) (list names and address(es) of parties served by mail):

Peter J. Bellon
Bellon & Maningo, Ltd.
732 S. 6th St., Ste. 102
Las Vegas, NV 89101-6927

DATED this 27 day of August, 2015.



Signature of Appellant

Jennifer Gordon

Print Name of Appellant

91 Autumn Day Street

Address

Henderson/Nevada/89012

City/State/Zip

(702) 234-9673

Telephone