

IN THE SUPREME COURT OF THE STATE OF NEVADA

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Sep 16 2015 10:56 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

JENNIFER ELISE GORDON,
Appellant(s),

vs.

MATTHEW ROBERT GEIGER,
Respondent(s),

Case No: D430639

Docket No: 67955

RECORD ON APPEAL VOLUME 1

ATTORNEY FOR APPELLANT
JENNIFER ELISE GORDON,
PROPER PERSON
CONFIDENTIAL ADDRESS

ATTORNEY FOR RESPONDENT
MATTHEW ROBERT GEIGER,
PROPER PERSON
8659 HORIZON WIND AVE., APT. 102
LAS VEGAS, NV 89178

I N D E X

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ORIGINAL



COMD
MATTHEW GEIGER
49 Collins Dr.
Henderson, Nevada 89015
(702) 564-9529
Plaintiff In Proper Person

FILED

MAY 26 3 16 PM '10

John L. Johnson
CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW GEIGER,

Plaintiff,

vs.

JENNIFER GORDON,

Defendant,

CASE NO:
DEPT NO:

D-10-430639-D
K

COMPLAINT FOR DIVORCE

COMES NOW the Plaintiff, MATTHEW GEIGER representing himself
In Proper Person, and for his cause of action for divorce against
the Defendant, JENNIFER GORDON, complains and alleges as follows:

I.

That Plaintiff is and for at least six (6) weeks prior to the
commencement of this action has been a resident of Clark County,
Nevada; and has the intent to continue to be a resident of the State
of Nevada making Nevada his permanent domicile.

II.

At all times herein relevant, Defendant was a resident of the
State of Nevada.

III.

That the parties were married to each other on or about August
2004, in Las Vegas, Nevada, and ever since that date have been
husband and wife.

1 IV.

2 That the parties are incompatible in marriage.

3 V.

4 That there are two (2) minor children born the issue of the
5 parties, namely, WESTON CURTIS GEIGER, born on November 11th, 2001
6 and CHEVY WHALYN GEIGER, born August 11th, 2004.

7 That there were no minor children adopted by the parties before
8 or during the marriage and the Defendant is not now pregnant.

9 That the State of Nevada is the habitual residence of the minor
10 children.

11 VI.

12 That the parties hereto are fit and proper persons to be
13 awarded joint legal custody and joint physical custody of the minor
14 children with an equal shared custody arrangement.

15 VII.

16 That child support be based upon Wright v. Osburn with
17 appropriate offsets per NRS 125B.070 and NRS 125B.080; and Rivero
18 v. Rivero, 1.124 Nev. Adv. Op. No. 84.

19 That the Defendant provide health insurance for the minor
20 children through her respective employer and that the parties
21 equally divide any unpaid or un-reimbursed medical expenses of the
22 minor children.

23 VIII.

24 That neither party pay spousal support to the other.

25 IX.

26 That there is community property and there are community debts
27 to be adjudicated by this court. That Plaintiff reserves the right
28

1 to amend this Complaint in the event that community property or
2 community debts are later discovered that are not now known by
3 Plaintiff.

4 **X.**

5 That the parties split the dependent tax exemption yearly.

6 **XI.**

7 That Plaintiff is entitled to his costs and disbursements and
8 attorney's fees.

9 WHEREFORE, Plaintiff prays for judgment as follows:

10 1. That the bonds of matrimony now existing between the
11 parties be dissolved and the parties be returned to the status of
12 single unmarried persons.

13 2. For an order granting the parties joint legal custody and
14 joint physical custody of the minor children with an equal shared
15 custody arrangement.

16 3. That child support be based upon Wright v. Osburn with
17 appropriate offsets per NRS 125B.070 and NRS 125B.080; and Rivero
18 v. Rivero, 1.124 Nev. Adv. Op. No. 84.

19 4. That the Defendant provide health insurance for the
20 minor children and that the parties equally divide and pay any
21 unpaid medical expenses of the minor children, including any
22 deductibles and co-payments.

23 5. That neither party pay spousal support to the other.

24 6. That the court divide the assets and debts of the
25 parties equitably.

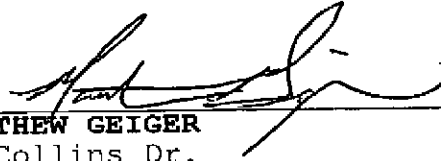
26 7. For an Order that the parties split the dependent tax
27 exemption yearly.
28

1 8. For Plaintiff's costs, disbursements and attorneys
2 fees.

3 9. For such other and further relief as the court may deem
4 just and proper.

5 DATED this 26th day of May, 2010.

6 Respectfully submitted:

7 
8

9 **MATTHEW GEIGER**
10 49 Collins Dr.
11 Henderson, Nevada 89015
12 (702) 564-9529
13 Plaintiff In Proper Person
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VERIFICATION

STATE OF NEVADA)
): ss.
COUNTY OF CLARK)

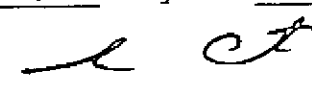
MATTHEW GEIGER under penalties of perjury, being first duly sworn, deposes and says:

That he is the Plaintiff in the above-entitled action; that he has read the foregoing **COMPLAINT FOR DIVORCE** and knows the contents thereof; that the same is true of his own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, he believes it to be true.

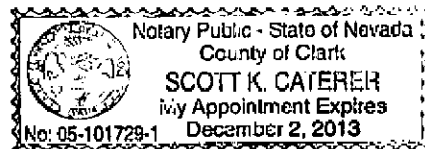

MATTHEW GEIGER

SUBSCRIBED and SWORN to before me

this 26 day of MAY, 2010



NOTARY PUBLIC in and for
Said County and State

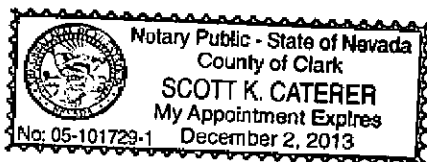



ACKNOWLEDGMENT

STATE OF NEVADA)
): ss.
COUNTY OF CLARK)

On this 26 day of MAY, 2010, before me, the undersigned Notary Public in and for said County and State, appeared, **MATTHEW GEIGER** known to me to be the person described in and who executed the foregoing instrument and who acknowledged to me that he did so freely and voluntarily and for the uses and purposes mentioned therein.

WITNESSETH my hand and official seal.





NOTARY PUBLIC

Steven L. Blum

CLERK OF THE COURT

1 AFFT

2 MATTHEW GEIGER

49 Collins Dr.

Henderson, Nevada 89121

(702) 564-9529

Plaintiff In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW GEIGER,

Plaintiff,

vs.

JENNIFER GORDON,

Defendant,

CASE NO: D-10-430639-D

DEPT NO: D

AFFIDAVIT OF SERVICE

STATE OF NEVADA)

: ss.

COUNTY OF CLARK)

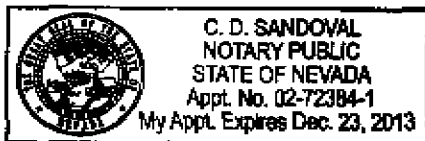
JAMES MILEY, being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceeding in which this affidavit is made. That affiant received 1 copy of the SUMMONS, JOINT PRELIMINARY INJUNCTION, COMPLAINT FOR DIVORCE, on the 29th day of May, 2010, and served the same on the 29th day of May, 2010, by serving the Defendant, JENNIFER GORDON, by personally delivering and leaving a copy with the Defendant, JENNIFER GORDON, at the Defendant's place of residence, 5133 Teal Petals St., N. Las Vegas Nevada 89081.

James Miley
JAMES MILEY

SUBSCRIBED and SWORN to before me this

2nd day of *June*, 2010.

[Signature]
Notary Public



217.

FILED

JUN 11 2010

CLERK OF COURT

ORIGINAL

1 ANS

2 (Your name) Jennifer Gordon

3 (Address) 5133 Teal Petals St.

4 North Las Vegas, NV 89081

5 (Telephone) (702) 234 9673

In Proper Person

DISTRICT COURT

CLARK COUNTY, NEVADA

9 Matthew Geiger

10 Plaintiff,

11 vs.

12 Jennifer Gordon

13 Defendant.

CASE NO.: D-10-430639-D

DEPT. NO.: K

14 ANSWER AND COUNTERCLAIM FOR DIVORCE

15 COMES NOW, Defendant, Jennifer Gordon, in Proper Person, and hereby

16 files (check one) ☐ his/ ☒ her Answer and Counterclaim to Plaintiff's Complaint for Divorce as
17 follows:

18 ANSWER

19 1. Defendant admits the allegations contained in paragraph(s) (insert the paragraph
20 number(s) from the Complaint that you agree with) I., II., IV., V., IX.,
21 of the Complaint.

22 2. Defendant denies the allegations contained in paragraph(s) (insert the paragraph
23 number(s) from the Complaint that you do not agree with) III., VI., VII., VIII., X., XI.
24 of the Complaint.

25 ///

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27 January 2, 2001

28 ALL RIGHTS RESERVED

ANSCOUNT.3K1.WPD (#21)

Use only most current version

Please call the Self-Help Center to confirm most current version.

3. After reasonable investigation, this Defendant is without sufficient information to form a belief as to the truth or falsity of the matters alleged in paragraph(s) (insert the paragraph number(s) that you do not know to be true or false because you do not have enough information to say whether they are true or false) NA of the Complaint; the allegations are therefore denied with proof demanded at trial.

COUNTERCLAIM

Defendant, as and for a Counterclaim for Divorce against Plaintiff, alleges as follows:

1. That Defendant, for a period of more than six weeks immediately preceding the filing of this action, has been and now is an actual, bona fide resident of the State of Nevada, County of Clark, and has been actually physically present and domiciled in Nevada for more than six (6) weeks prior to the filing of this action.

2. That Plaintiff and Defendant were married on the (day) 17th day of (month) August, (year) 2005 in (city of wedding) Las Vegas, (state of wedding) Nevada, and have been and still are husband and wife.

3. That there are (number) 2 minor children who are either the issue of this marriage or have been adopted by the parties and (check one) ☐ Plaintiff/ ☒ Defendant ☐ is/ ☒ is not currently pregnant. The name(s) and date(s) of birth of the child(ren) are:
(Name) Wesley Curtis Geiger, (date of birth) 11-11-01; (Name) Cheryl Whalen Geiger, (date of birth) 08-11-04; (Name) NA, (date of birth) _____.

4. (CHECK ONLY ONE BOX)

☐ The parties are fit and proper persons to be awarded joint legal custody of the minor child(ren).

OR

☐ (Check one) ☐ Plaintiff/ ☒ Defendant is a fit and proper person to be awarded sole legal custody of the minor child(ren).

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5. (CHECK ONLY ONE BOX)

☐ The parties are fit and proper persons to be awarded joint physical custody of the minor child(ren). Plaintiff should have visitation as follows: (must have days and times) _____

Defendant should have visitation as follows: (must have days and times) _____

OR

☐ (Check one) ☐ Plaintiff/ ☐ Defendant is a fit and proper person to be awarded primary physical custody of the minor child(ren). (Check one) ☐ Plaintiff/ ☐ Defendant should have visitation as follows: (must have days and times) _____

OR

☒ (Check one) ☐ Plaintiff/ ☒ Defendant is a fit and proper person to be awarded sole physical custody of the minor child(ren).

6. That the holiday visitation, when in conflict with the above, will take precedence, and should be as follows: (must specify days and times)

For each of the holidays listed below, Plaintiff should have visitation in the even-numbered years and Defendant should have visitation in the odd-numbered years:

a. Court appointed times from _____ until _____

b. _____ from _____ until _____

///

1 c. _____ from _____
 2 until _____
 3 d. _____ from _____
 4 until _____

5 For each of the holidays listed below, Defendant should have visitation in the even-numbered
 6 years and Plaintiff should have visitation in the odd-numbered years:

7 a. Christmas from _____
 8 until _____
 9 b. Independence Day from _____
 10 until _____
 11 c. Thanksgiving from _____
 12 until _____
 13 d. Birthdays from _____
 14 until _____

15 Plaintiff should have visitation every year for the following holidays:

16 a. Court appointed from _____
 17 until _____
 18 b. Fathers Day from _____
 19 until _____
 20 c. _____ from _____
 21 until _____
 22 d. _____ from _____
 23 until _____

24 Defendant should have visitation every year for the following holidays:

25 a. Mothers Day from _____
 26 until _____

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b. Court appointed from _____
until _____
c. _____ from _____
until _____
d. _____ from _____
until _____

7. That (check one) ☒ Plaintiff/ [] Defendant should pay child support in the amount of \$ 1000 per month as and for child support.

8. (CHECK ONLY ONE BOX)

☒ That the amount of child support in paragraph 7 is in compliance with NRS 125B.070 and is (check one) [] 18%/ ☒ 25%/ [] 29% of (check one) ☒ Plaintiff's/ [] Defendant's gross monthly income.

OR

[] That under the statutory formula, (check one) [] Plaintiff/ [] Defendant would be obligated to pay \$ _____ per month for child support. That amount should be changed because (please see NRS 125B.080 for the only reasons that you can deviate from the formula) _____

This amount of child support meets the child(ren)'s financial needs.

9. That (check one) ☒ Plaintiff/ [] Defendant should maintain medical and dental insurance for the minor child(ren), if available. Any deductibles and expenses not covered by insurance should be paid by equally by both parties.

10. (CHECK ONLY ONE BOX)

[] That there is no community property to be adjudicated by the Court.

OR

1 ☒ That there is community property which needs to be adjudicated by the Court and
2 should be divided as follows:

3 A. To Plaintiff:

- 4 1. His clothing
5 2. His tools
6 3. _____
7 4. _____

8 B. To Defendant:

- 9 1. All furniture, all kids belongings
10 2. The house 5133 Teal Petals St NW, NW 89681
11 3. Pets - 1 dog, 2 cats
12 4. My tools

13 There may be additional community assets of the parties, the exact amounts and descriptions
14 of which are presently unknown to Defendant. Defendant asks permission of this Court to amend
15 this Counterclaim to insert this information when it becomes known to Defendant or at the time of
16 trial.

17 11.

(CHECK ONLY ONE BOX)

18 [] That there are no community debts to be adjudicated by the Court.

19 OR

20 ☒ That there are community debts which need to be adjudicated by the Court and
21 should be divided as follows:

22 A. To Plaintiff:

- 23 1. _____
24 2. Medical bills
25 4. School tuition for kids
26 5. _____

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6. _____
- B. To Defendant:
1. School tuition for kids
2. medical bills / Hospital bills
3. Outstanding utility bills
4. The house - 5133 Teal Petals St. NCV, NV
5. _____
6. _____

8908

There may be additional community debts of the parties, the exact amounts and descriptions of which are presently unknown to Defendant. Defendant asks permission of this Court to amend this Counterclaim to insert this information when it becomes known to Defendant or at the time of trial.

12. (CHECK ONLY ONE BOX)

[] That neither party should be awarded spousal support.

OR

☒ That Defendant requests spousal support in the amount of \$ 2500 per month for 5 (check one) [] months/ ☒ years.

13. (CHECK ONLY ONE BOX)

[] That [] Defendant/ [] Plaintiff should not have her former or maiden name restored.

OR

[] That (check one) [] Defendant/ [] Plaintiff should have her former or maiden name of _____ restored to her.

OR

☒ That (check one) ☒ Defendant/ [] Plaintiff never changed her name and therefore should retain her current name.

14. (CHECK ONLY ONE BOX)

☒ That during the course of said marriage, the tastes, mental disposition, views, likes and dislikes of Plaintiff and Defendant have become so widely divergent that the parties have become incompatible in marriage to such an extent that it is impossible for them to live together as husband and wife; that the incompatibility between Plaintiff and Defendant is so great that there is no possibility of reconciliation between them.

OR

☐ That the parties have lived separate and apart for more than one year and it is impossible for them to live together as husband and wife; there is no possibility of reconciliation.

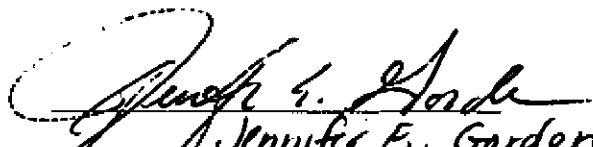
WHEREFORE, Defendant prays for a Judgement as follows:

1. That the marriage existing between Plaintiff and Defendant be dissolved and that Plaintiff be granted an absolute Decree of Divorce and that each of the parties be restored to the status of a single, unmarried person;
2. That the Court grant the relief requested in this Answer and Counterclaim; and
3. For such other relief as the Court finds to be just and proper.

DATED this (day) 10th day of (month) June, (year) 2010.

By:

(Your signature)


Jennifer E. Gordon
5133 Teal Petals St.
North Las Vegas, NV 89081

Defendant in Proper Person

///

///

1 VERIFICATION

2
3 STATE OF NEVADA }
4 COUNTY OF CLARK } ss:

5 Jennifer Gordon, under penalties of perjury, being first duly sworn, deposes
6 and says:

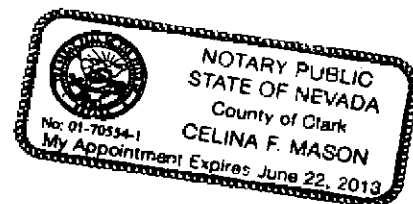
7 That I am the Defendant in the above-entitled action; that I have read the foregoing Answer
8 and Counterclaim for Divorce and know the contents thereof; that the same is true of my own
9 knowledge, except for those matters therein contained stated upon information and belief, and as to
10 those matters, I believe them to be true.

11 DATED this 11 day of (month) June, (year) 2010.

12
13 By: _____
14 (Your signature) [Signature]
15
16

17 SUBSCRIBED and SWORN to before
18 me this 11 day of (month) June
19 (year) 2010.
20 Celina F. Mason
21 NOTARY PUBLIC

22 ///
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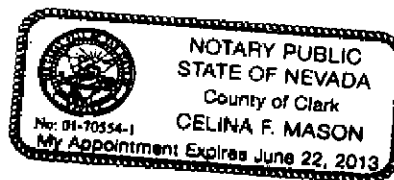
ACKNOWLEDGMENT

STATE OF NEVADA)
)ss:
COUNTY OF CLARK)

On this 11 day of (month) June, (year) 2010, before me, the undersigned
Notary Public in and for the said County and State, personally appeared Jennifer Gordon
known to me to be the person described in and who executed the foregoing Answer and
Counterclaim for Divorce, and who acknowledged to me that (check one) [] he/ [x] she did so
freely and voluntarily and for the uses and purposes therein mentioned.

WITNESS my hand and official seal.

Celina F. Mason
NOTARY PUBLIC



FILED

JUN 11 2010

ORIGINAL

CC13

(Your Name) Jennifer Gordon

John A. Johnson
CLERK OF COURT

(Address) 5133 Teal Petals St.

North Las Vegas, NV 89081

(Telephone) (702) 834 9673

(Email Address) _____

In Proper Person

DISTRICT COURT

CLARK COUNTY, NEVADA

Matthew Gerger

Plaintiff,

vs.

Jennifer Gordon

Defendant

CASE NO.: D-10-430639-D

DEPT NO.: K

DECLARATION UNDER UNIFORM
CHILD CUSTODY JURISDICTION
ENFORCEMENT ACT (NRS 125A.385)

1. There is/are 2 child(ren) of the parties subject to this proceeding. The name, place of birth, birth date and sex of each child, present address, periods of residence and places where each child has lived within the last five (5) years, and the name(s), present address and relationship to the child of each person with whom the child has lived during that time are:

Child's Name	Place of Birth	Birth Date	Sex
A. <u>Nestor Gerger</u>	<u>Las Vegas</u>	<u>11-11-01</u>	<u>M</u>
Period of Residence	Address	Person Child Lived With (Name & Current Address)	Relationship
<u>2007</u> to present	<u>5133 Teal Petals St.</u>	<u>Jennifer Gordon</u>	<u>SON</u>
to		<u>(mom)</u>	
to			
Child's Name	Place of Birth	Birth Date	Sex
B. <u>Cheryl Gerger</u>	<u>Las Vegas</u>	<u>08-11-04</u>	<u>M</u>
Period of Residence	Address	Person Child Lived With (Name & Current Address)	Relationship
<u>2007</u> to present	<u>5133 Teal Petals St.</u>	<u>Jennifer Gordon</u>	<u>SON</u>
to		<u>(mom)</u>	
to			

Child's Name	Place of Birth	Birth Date	Sex
C.			
Period of Residence	Address	Person Child Lived With (Name & Current Address)	Relationship
to present	NA		
to			
to			
Child's Name	Place of Birth	Birth Date	Sex
D.			
Period of Residence	Address	Person Child Lived With (Name & Current Address)	Relationship
to present	NA		
to			
to			
Child's Name	Place of Birth	Birth Date	Sex
E.			
Period of Residence	Address	Person Child Lived With (Name & Current Address)	Relationship
to present	NA		
to			
to			

NOTE: Attach information about additional children or additional information on children listed above on attached sheet(s). Attached sheet(s) **MUST** be same size as this form.

2. I (check one) ☒ have ☐ have not participated as a party, witness, or in any other capacity in any other litigation or custody proceeding in this or any other state concerning custody of a child involved in this proceeding.
- If you checked "have" above, please supply the following information about the other proceeding(s):
- Name of each child involved: Weston Geiger, Cheryl Geiger
 - Your role in other proceeding(s): Plaintiff
 - Court, state and case number of other proceeding(s): T-10-125476
 - Date of court order or judgment in other proceeding(s): May 26, 2010
3. I (check one) ☒ do ☐ do not know of any proceeding that could affect the current proceeding including proceedings for enforcement and proceedings related to domestic violence, protective orders, termination of parental rights and adoptions pending in a court of this or any other state concerning a child involved in this proceeding other than that set out in item 1 above.

If you have checked do above, please supply the following information about the other proceeding(s):

- a. Name of each child involved: Wesley Geiger, Chevy Geiger
b. Your role in other proceeding(s): Plaintiff
c. Court, state and case number of other proceeding(s): T-10-125476
d. Date of court order or judgment in other proceeding(s): May 26, 2010

4. I (check one) ☐ do ☒ do not know of any person not a party to this proceeding who has physical custody or claims to have custody or visitation rights with respect to any child subject to this proceeding.

If you checked "do" above, please supply the following information and check appropriate boxes below:

- a. Name and address of person(s): _____
☐ Person named has physical custody of (name of child) _____
☐ Person named claims custody rights as to (name of child) _____
☐ Person named claims visitation rights with (name of child) _____

5. I have a continuing duty to inform the court of any proceeding in this or any other state that could affect the current proceeding and will provide updated information to the court.

DATED this 10th day of June, (year) 2010.
(Your Signature) [Signature]

If signed in Nevada: I declare under penalty of perjury that the foregoing is true and correct.

Signed on 06-10-10
(Date)

[Signature]
(Your Signature)

If signed outside Nevada: I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Signed on _____
(Date)

(Your Signature)

1 CERT

2 (Your Name) Jennifer Gordon
3 (Address) 5133 Teal Petals St.
4 North Las Vegas, NV 89081
5 (Telephone) (702) 234 9673
6 (Email Address) _____

7 In Proper Person

FILED

JUN 11 2010

Ann L. Sullivan
CLERK OF COURT

ORIGINAL

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 Matthew Geiger

11 Plaintiff,

12 vs.

13 Jennifer Gordon

14 Defendant.

CASE NO.: D-10-430639-D

DEPT NO.: K

15 CERTIFICATE OF MAILING

16 I, (name of person who mailed document) Jennifer Gordon, DO HEREBY
17 declare under penalty of perjury under the law of the State of Nevada that the following is true
18 and correct. That on (month) June (day) 11, (year) 10 service of the: (check one)

19 ☒ Answer

☒ Opposition

20 ☐ Motion

☐ Other _____

21 was made pursuant to NRCP 5(b) by depositing a copy of same in the U.S. Mail in Las Vegas,
22 Nevada, postage prepaid, addressed as follows:

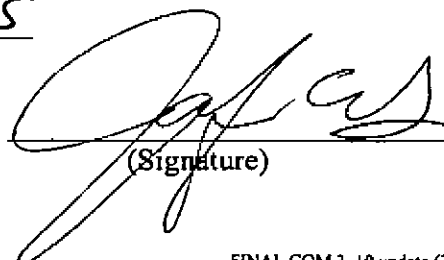
23 (Print the name and address of the person you mailed the documents to)

24 Matthew Geiger

25 49 Collins Dr.

26 Henderson, NV 89015

27 DATED this 11 day of June, 2010

28 
(Signature)

ORIGINAL

1 RPY
2 MATTHEW GEIGER
3 49 Collins Dr.
4 Henderson, Nevada 89015
5 (702) 564-9529
6 Plaintiff In Proper Person

FILED

JUN 28 2010

Alvin B. Williams
CLERK OF COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW GEIGER,

Plaintiff,

vs.

JENNIFER GORDON,

Defendant,

CASE NO: D-10-430639-D
DEPT NO: K

REPLY TO COUNTERCLAIM

COMES NOW the Plaintiff, MATTHEW GEIGER, representing himself
In Proper Person, and for his Reply to Defendant's Counterclaim
states and alleges as follows:

I.

Unless otherwise admitted, qualified or explained, Plaintiff
denies each and every thing matter and allegation contained in
Defendant's Counterclaim.

II.

Plaintiff admits Paragraphs 1, 2, 3, 10, 13, and 14, of the
Defendant's Counterclaim.

III.

Plaintiff denies Paragraphs 4, 5, 6, 7, 8, 9, 11, and 12, of
the Defendant's Counterclaim.

WHEREFORE, Plaintiff prays that Defendant take nothing by her
Counterclaim and that Plaintiff be awarded judgment in his favor.

DATED this 26th day of JUNE, 2010.

Respectfully submitted:

Matthew Geiger
MATTHEW GEIGER

49 Collins Dr.
Henderson, Nevada 89015
(702) 564-9529
Plaintiff In Proper Person

1
2 VERIFICATION

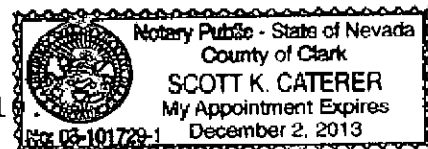
3 STATE OF NEVADA)
4 :
5 COUNTY OF CLARK) ss.

6 **MATTHEW GEIGER**, under penalties of perjury, being first duly
7 sworn, deposes and says:

8 That he is the Plaintiff in the above-entitled action; that he
9 has read the foregoing **REPLY TO COUNTERCLAIM** and knows the contents
10 thereof; that the same is true of his own knowledge, except for
11 those matters therein contained stated upon information and belief,
12 and as to those matters, he believes it to be true.

13 
14 **MATTHEW GEIGER**

15 SUBSCRIBED and SWORN to before me
16 this 28 day of June, 2010



18 sc ct
19 NOTARY PUBLIC in and for said County and State

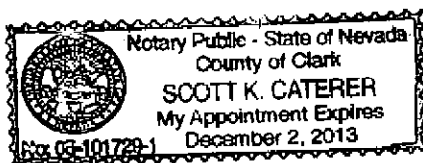
20 ACKNOWLEDGMENT

21 STATE OF NEVADA)
22 :
23 COUNTY OF CLARK) ss.

24 On this 24 day of June, 2010, before
25 me, the undersigned Notary Public in and for said County and State,
26 appeared, **MATTHEW GEIGER**, known to me to be the person described in
27 and who executed the foregoing instrument and who acknowledged to
28 me that he did so freely and voluntarily and for the uses and
purposes mentioned therein.

WITNESSETH my hand and official seal.

29 sc ct
30 NOTARY PUBLIC



ORIGINAL

FILED

JUN 28 2010

John T. Johnson
CLERK OF COURT

1 ROC
2 MATTHEW GEIGER
3 49 Collins Dr.
4 Henderson, Nevada 89015
5 (702) 564-9529
6 Plaintiff In Proper Person

7 DISTRICT COURT
8 CLARK COUNTY, NEVADA

9 MATTHEW GEIGER,)
10)
11 Plaintiff,)
12)
13 vs.)
14)
15 JENNIFER GORDON,)
16)
17 Defendant,)
18)

CASE NO: D-10-430639-D
DEPT NO: K

19 CERTIFICATE OF MAILING

20 The undersigned, MATTHEW GEIGER hereby certifies that on the
21 28 day of JUNE, 2010, I deposited in the United States
22 mail, first class postage pre-paid, certified mail, return receipt
23 requested, a true and correct copy of REPLY TO COUNTERCLAIM
24 addressed as follows:

25 Jennifer Gordon
26 5133 Teal Petals St.
27 North Las Vegas, NV 89081

28 *Matthew Geiger*

MATTHEW GEIGER
Plaintiff in Proper Person

7009 3410 0001 0349 6501

U.S. Postal Service[®]
CERTIFIED MAIL[™] RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com.
NORTH LAS VEGAS NV 89081
OFFICIAL USE

Postage	\$ 0.44	0012
Certified Fee	\$2.80	55
Return Receipt Fee (Endorsement Required)	\$2.30	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 5.54	06/28/2010

Sent To Jennifer Gordon
Street, Apt. No.,
or PO Box No. 5133 Teal Petals st.
City, State, ZIP+4[®] N. Las Vegas, N.V. 89081
PS Form 3800, August 2006 See Reverse for Instructions

DISTRICT COURT
CLARK COUNTY, NEVADA

FILED

JUL 15 3 29 PM '10

MATTHEW ROBERT GEIGER,
PLAINTIFF.
VS.
JENNIFER ELISE GORDON,
DEFENDANT.

CASE NO: D-10-489639-D

Cynthia N. Giuliani
CLERK OF THE COURT

DEPARTMENT K

NOTICE OF 16.2 CASE MANAGEMENT CONFERENCE

TO: Matthew Robert Geiger; Jennifer Elise Gordon

Please be advised that the above-entitled matter has been scheduled for
Case Management Conference to be heard by the Honorable Cynthia N. Giuliani
at the Family Courts and Services Center, 601 N. Pecos Rd., Las Vegas, Nevada,
on the 30th day of August, 2010 at the hour of 1:00 PM in Department K.
YOUR PRESENCE IS NECESSARY.

HONORABLE CYNTHIA N. GIULIANI

By: *Barbara Karp*
Barbara Karp
Judicial Executive Assistant

I hereby certify that on the above file stamped date:

☒ I mailed, via first-class mail, postage fully prepaid, the foregoing Notice Of
Hearing to:

Jennifer Elise Gordon
5133 Teal Petals CT
North Las Vegas NV 89081

Matthew Robert Geiger
49 Collins DR
Henderson NV 89015

Barbara Karp
Barbara Karp
Judicial Executive Assistant
Department K

MAC

CYNTHIA N. GIULIANI
DISTRICT JUDGE

FAMILY DIVISION, DEPT. K
LAS VEGAS NV 89101

ORIGINAL

71

SUMM

DISTRICT COURT

FILED

CLARK COUNTY, NEVADA

AUG 27 10 05 AM '10

MATTHEW GEIGER,

Plaintiff,

vs.

JENNIFER GORDON,

Defendant,

CASE NO:
DEPT NO:

CLERK OF THE COURT

D-10-430639-D
K

SUMMONS

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A civil Complaint has been filed by the Plaintiff against you for the relief set forth on the Complaint.

1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the date of service, you must do the following:

a. File with the Clerk of this Court, whose address is shown below; a formal written response to the Complaint in accordance with the rules of the Court.

b. Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the Plaintiff and this court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.

3. If you intend to seek the advice of an attorney in the this matter, you should do so promptly so that your response may be filed on time.

Issued at the direction of:

STEVEN D. GRIERSON
CLERK OF THE COURT

MATTHEW GEIGER
49 Collins Dr.
Henderson, Nevada 89015
(702) 564-9529
Plaintiff in Proper Person

BY *Karen L. Gallagher*
Deputy Clerk Date
County Courthouse MAY 25 2010
601 N. Pecos
Henderson, Nevada 89101

ORIGINAL

71

CC12

DISTRICT COURT
CLARK COUNTY, NEVADA

FILED

AUG 27 10 05 AM '10

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

CASE NO:
DEPT NO:

Steven D. Grierson
CLERK OF THE COURT

D-10-430639-D
K

JOINT PRELIMINARY INJUNCTION

NOTICE! THIS INJUNCTION IS EFFECTIVE UPON THE PARTY REQUESTING SAME WHEN ISSUED AND AGAINST THE OTHER PARTY WHEN SERVED. THIS INJUNCTION SHALL REMAIN IN EFFECT FROM THE TIME OF ITS ISSUANCE UNTIL TRIAL OR UNTIL DISSOLVED OR MODIFIED BY THE COURT. DISOBEDIENCE OF THIS INJUNCTION IS PUNISHABLE BY CONTEMPT

TO: PLAINTIFF and DEFENDANT.

YOU ARE HEREBY PROHIBITED AND RESTRAINED FROM:

1. Transferring, encumbering, concealing, selling or otherwise disposing of any of your joint, common or community property except in the usual course of business or for the necessities of life, without the written consent of the parties or the permission of the court.
2. Molesting, harassing, disturbing the peace of or committing an assault or battery upon your spouse or your child or step-child.
3. Removing any child of the parties then residing in the State of Nevada with an intent or effect to deprive the court of jurisdiction as to said child without the prior written consent of the parties or the advance permission of the court.

Issued at the direction of:

STEVEN D. GRIERSON
CLERK OF COURT

Matthew Geiger
MATTHEW GEIGER
49 Collins Dr.
Henderson, Nevada 89015
(702) 564-9529
Plaintiff In Proper Person

James L. Fairlight
DEPUTY CLERK
County Courthouse
601 N. Pecos
Henderson, Nevada 89101
DATE
MAY 26 2010

FILED IN OPEN COURT

AUG 30 2010

District Court

STEVEN D. GRIERSON
CLERK OF THE COURT

FAMILY DIVISION

BY
CLARK COUNTY, NEVADA

CAROL CRITCHETT

DEPUTY

Matthew R. Gager
PLAINTIFF

-vs-

Jennifer E. Gordon
DEFENDANT

CASE NO. D-10-430639-D
DEPARTMENT K

NOTICE OF SEMINAR COMPLETION - EDCR 5.07

PLEASE TAKE NOTICE THAT JENNIFER E. GORDON
(Name)

SUCCESSFULLY COMPLETED THE MANDATORY DIVORCE EDUCATION SEMINAR ON

8-12-10
(Date)

[Signature]
PROGRAM REPRESENTATIVE

8-12-10
DATE

PALO VERDE
CHILD & FAMILY SERVICES
2801 S. VALLEY VIEW BLVD
SUITE #10
LAS VEGAS, NV 89102

DISTRIBUTION: WHITE - Clerk CANARY - Party PINK - Program

Copeform.wpd

AUG 30 2010

District Court

FAMILY DIVISION

CLARK COUNTY, NEVADA

STEVEN D. GRIERSON
CLERK OF THE COURT

BY [Signature]

CAROL CRITCHETT

DEPUTY

Matthew Geiger

PLAINTIFF

-vs-

Jennifer Gaden

DEFENDANT

CASE NO. D 430639

DEPARTMENT K

NOTICE OF SEMINAR COMPLETION - EDCR 5.07

PLEASE TAKE NOTICE THAT Matthew B. Geiger
(Name)

SUCCESSFULLY COMPLETED THE MANDATORY DIVORCE EDUCATION SEMINAR ON

6/26/10
(Date)

PALO VERDE
CHILD & FAMILY SERVICES
2801 S. VALLEY VIEW BLVD
SUITE #10
LAS VEGAS, NV 89102

[Signature]
PROGRAM REPRESENTATIVE

6/26/10
DATE

OFFM

FILED IN OPEN COURT

August 30, 2010

STEVEN D. GRIERSON
CEO / CLERK OF THE COURT

By: [Signature]
Deputy

CAROL CRITCHETT

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Matthew Robert
Geiger

Plaintiff

-vs-

Jennifer Elise
Gordon

Defendant

Case No.

D-10-430639-10

Department

K

ORDER FOR FAMILY MEDIATION CENTER SERVICES

IT IS HEREBY ORDERED that, in the spirit of preserving the parents' right to make decisions about the future best interest of their child(ren), the above-named parties will make every attempt to resolve their disputes.

IT IS FURTHER ORDERED that, if a Court interpreter is needed, it is the parties responsibility to pay the interpreter at the time services are rendered, and the language needed is: _____

IT IS FURTHER ORDERED by the Court that, regarding the child(ren) at issue, the Family Mediation Center (FMC) shall:

X

Provide Confidential Mediation

Mediation

(When telephone mediation is ordered, one or both parties must reside out-of-state.)

X

Include a Domestic Violence Protocol

Interview Child(ren)

Cherry + Weston Geiger

Issues:

Parental Preference

Reunify Parent/Child(ren)

IT IS FURTHER ORDERED that the cost of mediation will be assessed using a sliding scale based on each litigant's individual financial status with a maximum cost of \$200.00 per person. Child(ren) interviews are \$50.00 per child per litigant. Parent/Child(ren) reunifications are \$50.00 per session per litigant.

IT IS FURTHER ORDERED that the parties and/or their attorneys must report to the Family Mediation Center at 801 N. Pecos Road, Las Vegas, NV 89101, phone (702) 455-4188.

DATED this 30 day of August, 2010.

This matter is reset for

Date: 11-01-10 Time: 11AM

[Signature]
District Judge

Attorney for Plaintiff:

Pro Se

Attorney for Defendant:

Pro Se

NOV 01 2010

STEVEN D. GRIERSON
CLERK OF THE COURTDISTRICT COURT
CLARK COUNTY, NEVADA

BY

Victoria Pott

DEPUTY

VICTORIA POTT

FAMILY DIVISION

GEIGER, MATTHEW
Plaintiff,

vs.

GORDON, JENNIFER
Defendant,Case No. D-10-430639
Depl. K VICTORIA POTTBEHAVIOR ORDER

Parties are hereby ordered to do the following:

1. No abusive telephone calls to either party or to the children.
2. No name calling.
3. No foul language.
4. Avoid conflicts/contacts with the other part's "significant other."
5. Do not use child or children as a weapon against the other parent.
6. No harassment at places of employment.
7. No copies of letters to anyone associated with a party.
8. No phone calls to other people associated with the other party.
9. Focus to remain on best interest of child or children
10. Maintain respect toward the other party's relatives and friends.
11. You will advise all your friends, relatives and significant other, (if any) not to disparage, criticize or harass the other party.
12. Child custody exchanges, visitations, etc. shall be done in a civil, as abiding

CYNTHIA N. GIULIANI
DISTRICT JUDGEFAMILY DIVISION, DEPT. K
LAS VEGAS NV 89101

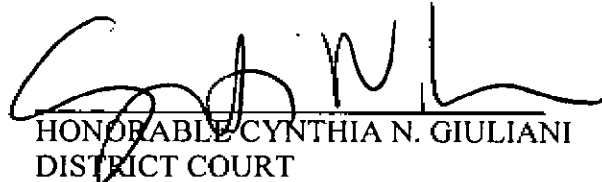
manner and reasonably close to the time specified by the Court.

13. No threats of violence or harm to any party, any other relative and or friends of any party.

14. Neither party shall interrogate the child or children, as to the activities or events at the other parent's residence, etc. and shall try to respect the child's privacy and relationship with the other parent.

15. In the event of an emergency or unforeseen circumstance that could affect an exchange of the child or the time of the exchange, a party shall call or contact the other party as soon as is reasonably possible.

DATED this 1st day of November 2010.


HONORABLE CYNTHIA N. GIULIANI
DISTRICT COURT

CYNTHIA N. GIULIANI
DISTRICT JUDGE

FAMILY DIVISION, DEPT. K
LAS VEGAS NV 89101

CRIGINAL

FILED IN OPEN COURT

NOV 01 2010

DISTRICT COURT
CLARK COUNTY, NEVADA

STEVEN D. GRIERSON
CLERK OF THE COURT

MATTHEW GEIGER,

BY *Victoria Pott*

VICTORIA POTT

DEPUTY

Plaintiff

vs

Case No. D-10-430639-D
Department No. K

JENNIFER GORDON,

Defendant

PARTIAL PARENTING AGREEMENT

Date of Hearing: 11-1-10
Time of Hearing: 11:00 a.m.

The parents have met in mediation and have agreed to a Partial Parenting Agreement which addresses legal custody, parenting time-share arrangement, holiday time-share arrangement, transportation, and vacation. The parents have been unable to reach an agreement with regard to the issue of what to call their physical custody; therefore, they desire the Court to make the final determination in this matter for them. The intent of this Partial Parenting Agreement is to promote healthy relationships between the children, Weston Geiger, DOB: 11-11-01, Chevy Geiger, DOB: 8-11-04, and their parents. Each of the parents, Jennifer Gordon, natural mother, and Matthew Geiger, natural father, agree that co-parenting requires the acceptance of mutual responsibilities and rights as far as the children are concerned.

LEGAL CUSTODY PROVISIONS

Legal custody addresses the issues and matters including, but not limited to, the health, education, religious upbringing and welfare of the children.

The parents agree to share joint legal custody of the children named above.

RECEIVED

SEP 24 2010

DISTRICT COURT
CLARK COUNTY, NEVADA

The parents agree to provide each other with the names, addresses, telephone numbers of all medical, educational, child care and other providers of professional services for the children. Should this information change, each parent agrees to provide notification in advance, or as soon as possible, to the other parent.

Both parents are entitled to have access to medical information (both emergency and routine), school records, and to consult with any and all professionals involved with the children. The parents agree that each parent shall be empowered to obtain emergency health care for the children without the consent of the other parent. The parents agree to notify the other parent as soon as reasonably possible of any illness requiring medical attention or any emergency involving the children.

OBTAINING INFORMATION

The parents agree to provide each other with the address and telephone number at which the children reside.

The parents agree to notify each other, and the Clerk of the Court, in writing at least ten (10) days prior to changing residences, phone numbers, or employment.

The parents agree to provide each other, upon receipt, information concerning the well-being of the children, including, but not limited to, school information, activities involving the children, and all communications from health care providers.

The parents agree to advise each other of school, athletic and social events in which the children participate, and both parents may participate in activities for the children.

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1 Christmas

2 The parents agree that Christmas shall be defined as beginning December 23 at
3 7:00 p.m. and concluding January 2 at 7:00 p.m.

4 Father's Day

5 The parents agree that Father's Day shall begin the Friday preceding Father's Day at
6 7:00 p.m. and end Father's Day at 7:00 p.m. The father shall have the children each year on Father's
7 Day.
8

9 Children's Birthdays

10 The parents agree to share the children's birthdays based upon mutual agreement,
11 with the celebrations taking place at a neutral location. Specific plans shall be arranged seven (7)
12 days in advance.
13

14 VACATION

15 The parents agree that vacation shall take precedence over the regular time-share
16 arrangements but not over the holiday time-share arrangements.

17 The parents agree that provided it causes no disruption to the children's schooling,
18 they shall each be allowed to have the children during their respective vacations, with fourteen (14)
19 days advance notice to the other parent.
20

21 The parents agree that prior to leaving for vacation; they will provide each other with
22 a travel itinerary to include dates of travel, destination, location, and telephone number where the
23 children can be reached.
24

25 ADDITIONAL TIME

26 The parents agree that any additional time with the children or changes in the
27 parenting schedule shall be arranged by mutual agreement.
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FILED IN OPEN COURT
December 14, 2010

STEVEN D. GRIERSON
CLERK OF THE COURT

By: Carol Critchett Deputy
CAROL CRITCHETT

DISTRICT COURT
FAMILY DIVISION
Clark County, Nevada

Matthew Robert Geiger
Plaintiff

-vs-
Jennifer Elise Gordon
Defendant

Case Number
Department

D-10-430639-D
K

REFERRAL ORDER FOR OUTSOURCED EVALUATION SERVICES

In accordance with EDCR 5.70, the Court may order family evaluations of those parties appearing before the Court that have been unable to mutually resolve their custody and access issues, and where the Court may require additional information prior to making a judicial decision in the matter. Once ordered, the family evaluation shall be completed by a qualified individual or agency, as defined by EDCR 5.70. The selection of this evaluator may be by mutual agreement of the parties, or absent this agreement, by judicial decision.

IT IS HEREBY ORDERED that the following individual/agency shall provide a family evaluation:

Individual/Agency: _____

Telephone Number: _____

IT IS FURTHER ORDERED that the above-referenced evaluator shall provide the following services with ☒ or without ☐ recommendations:

- | | |
|---|--|
| <input type="checkbox"/> Substance Abuse Evaluation | <input type="checkbox"/> Child Reunification |
| <input type="checkbox"/> Child Custody Evaluation | <input type="checkbox"/> Emergency Evaluation |
| <input type="checkbox"/> Child Custody Evaluation with OTI* | <input type="checkbox"/> Protective Order Evaluation |
| <input type="checkbox"/> Child Interview | <input checked="" type="checkbox"/> Other <u>Evaluation of Plaintiff's</u> |

Mental State and ability to care for children.
suicide, depression

IT IS FURTHER ORDERED that the parties are responsible for all fees; that the fees shall be paid directly to the evaluator prior to the commencement of the family evaluation services.

Each party shall pay 50% of the cost for this service.
X Plaintiff shall pay 100% of the cost.

ORDERED AND DATED this 14 day of December, 20 10

This matter is reset for:

Date 3-09-11 Time 11:00

Report Due Date: 2-23-11

Attorney for Plaintiff: Pro Se

Attorney for Defendant: Pro Se

G. A. W. H.
DISTRICT JUDGE

*Out of Town Investigation - Courtesy home study from another jurisdiction.

OutSrcOrder (Rev. 10/04)

Court fax # 384-5017

ORDER

FILED IN OPEN COURT
December 14, 2010

STEVEN D. GRIERSON
CLERK OF THE COURT

By: Carol Critchett
Deputy

DISTRICT COURT
FAMILY DIVISION
Clark County, Nevada

CAROL CRITCHETT

Matthew Robert Geiger
Plaintiff

Case Number D-10-430639-D
Department K

-vs-
Jennifer Elise Gordin
Defendant

REFERRAL ORDER FOR OUTSOURCED EVALUATION SERVICES

In accordance with EDCR 5.70, the Court may order family evaluations of those parties appearing before the Court that have been unable to mutually resolve their custody and access issues, and where the Court may require additional information prior to making a judicial decision in the matter. Once ordered, the family evaluation shall be completed by a qualified individual or agency, as defined by EDCR 5.70. The selection of this evaluator may be by mutual agreement of the parties, or absent this agreement, by judicial decision.

IT IS HEREBY ORDERED that the following individual/agency shall provide a family evaluation:

Individual/Agency: _____

Telephone Number: _____

IT IS FURTHER ORDERED that the above-referenced evaluator shall provide the following services with ☐ or without ☐ recommendations:

☐ Substance Abuse Evaluation

☐ Child Reunification

☐ Child Custody Evaluation

☐ Emergency Evaluation

☐ Child Custody Evaluation with OT*

☐ Protective Order Evaluation

☒ Child Interview

☒ Other Wreston & Cheryl Geiger -

re: want to participate in wrestling, mother's
payraend, parental issues

IT IS FURTHER ORDERED that the parties are responsible for all fees; that the fees shall be paid directly to the evaluator prior to the commencement of the family evaluation services.

X Each party shall pay 50% of the cost for this service.
_____ shall pay 100% of the cost.

ORDERED AND DATED this 14 day of December, 2010.

This matter is reset for:
Date 3-09-11 Time 11AM

Report Due Date: 3-23-11
Attorney for Plaintiff: Pro se
Attorney for Defendant: Pro se

[Signature]
DISTRICT JUDGE

*Out of Town Investigation - Courtesy home study from another jurisdiction.

OutSrcOrder (Rev. 10/04)

Court fax #384-5017

☐ ORIGINAL

FILED

1 ORDR

2 (Your name) Matthew R. Geiger
3 (Address) 8069 Horizon window #103
4 Las Vegas, NV 89178
5 (Telephone) (702) 443-0101
6 In Proper Person

DEC 29 8 20 AM '10

Ann L. Shuman
CLERK OF THE COURT

7 DISTRICT COURT
8 CLARK COUNTY, NEVADA

9 Matthew R. Geiger)
10 Plaintiff,)

CASE NO.: D-10-430639-D

11 vs)

DEPT. NO.: K

12)
13 Jennifer E. Gordon)
14 Defendant.)

DATE OF HEARING 12-14-2010

TIME OF HEARING 1:30 pm

15)
16)
17 ORDER

18 This matter having come on for Hearing on the 14th day of (month) December,
19 (year) 2010, in the Family Division, Department K, of the Eighth Judicial District
20 Court, County of Clark; and Plaintiff, being (circle one) present in Proper Person/not present, and
21 Defendant, being (circle one) present in Proper Person/not present and the Court being fully advised
22 in the premises, both as to subject matter as well as the parties thereto, and that jurisdiction is proper
23 in Nevada, and good cause appearing therefore;

24 IT IS HEREBY ORDERED that: (fill in the judge's orders below)

25 Parties shall share joint legal custody. Parties shall
26 abide by the joint legal custody provisions. DEFENDANT shall
27 place PLAINTIFF'S CONTACT INFORMATION on the children's
28 SCHOOL RECORDS and DOCTOR RECORDS. Parties shall

✓
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March 1, 2004
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1
RECEIVED
Use only most current version.
Please call the Self-Help Center to confirm most current version.

DEC 17 2010

DISTRICT COURT
DEPT K

1 COOPERATE with any INFORMATION or DECISIONS needed
2 involving the children.
3

4 Parties shall COMMUNICATE through E-MAIL or TEXT-MESSAGING
5
6

7 PLAINTIFF is referred for a PSYCHOLOGICAL EVALUATION.
8 Plaintiff shall be EVALUATED by a DIFFERENT PSYCHOLOGIST
9 than the one he is CURRENTLY TREATING WITH. PLAINTIFF
10 shall CHOOSE a PSYCHOLOGIST through his HEALTH INSURANCE
11 PROVIDER. Plaintiff shall CONTACT the COURT for a REFERRAL
12 to a PSYCHOLOGIST from the COURT'S PROVIDER LIST if he
13 is UNABLE to LOCATE another PSYCHOLOGIST through his
14 INSURANCE PROVIDER.
15
16

17
18 The CHILDREN shall be ENROLLED into COUNSELING through the
19 parties' HEALTH INSURANCE. Parties shall MUTUALLY AGREE upon
20 the CHOICE of the COUNSELOR. Each party shall SUPPLY 3 NAMES
21 to the other party then DECIDE on the CHOICE for one COUNSELOR.
22 The parties shall ADVISE the COUNSELOR to send a REPORT to the
23 COURT outlining the CHILDREN'S CONDITIONS and PROGRESS.
24
25

26 Parties are ~~ref~~ referred for a CHILD INTERVIEW for both children.
27
28

1 The Children's COUNSELOR shall CONDUCT the CHILDREN INTERVIEW
2 then SEND A REPORT to the COURT 10 DAYS PRIOR to the
3 NEXT HEARING.
4

5
6 Parties are ADMONISHED NOT TO COACH the CHILDREN for the INTERVIEW.
7

8 Parties shall NOT DISCUSS the LITIGATION, COURT PROCEEDINGS
9 or COURT ORDERS with the children AT ANY TIME.
10

11
12 Parties shall ATTEND the COOPERATIVE PARENTING AND DIVORCE
13 class through the UNIVERSITY OF NEVADA at LAS VEGAS (UNLV). Each
14 party shall PAY their own FEES for the classes.
15

16
17 A RETURN HEARING regarding Plaintiff's PSYCHOLOGICAL EVALUATION,
18 the CHILDREN'S COUNSELING, the CHILD INTERVIEWS and the
19 PARENTING CLASSES is calendared for MARCH 09, 2011 at 11:00 am.
20

21
22 Parties are ADMONISHED TO ABIDE by the previously issued
23 BEHAVIOR ORDER and NOT DISPARAGE each other in the PRESENCE
24 of the CHILDREN.
25

26 Plaintiff shall receive the FIRST WEEK of the 2010 CHRISTMAS HOLIDAY
27
28

2 a

1 from after school on FRIDAY, DECEMBER 17, 2010, until SUNDAY Dec 26, 2010.

2
3 DEFENDANT shall receive the SECOND WEEK of the 2010 CHRISTMAS HOLIDAY
4 from SUNDAY DEC. 26, 2010 until SUNDAY, JANUARY 01, 2011.
5

6
7 PLAINTIFF shall PREPARE and FILE an UPDATED FINANCIAL DISCLOSURE FORM.

8 PLAINTIFF shall SERVE a COPY to DEFENDANT.
9

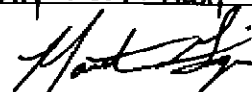
10
11 DEFENDANT shall PREPARE and FILE a SCHEDULE OF ARREARAGES for the
12 CHILD SUPPORT payments. DEFENDANT shall SERVE a COPY to PLAINTIFF.
13

14 PLAINTIFF shall PROVIDE PROOF of the CHILD SUPPORT PAYMENTS to DEFENDANT
15 via MAILING, and also to the COURT by way of COURTESY COPY of the Document
16 or DOCUMENTS sent to DEFENDANT.
17

18
19 PLAINTIFF shall pay CHILD SUPPORT in the amount of 25% of his GROSS
20 MONTHLY INCOME for the two children. Upon PROOF of any UNEMPLOYMENT
21 or INCOME CHANGE the CHILD SUPPORT may be MODIFIED to the
22 STATUTORY MINIMUM of \$100.00 per month per child or 25%
23 of the GROSS MONTHLY UNEMPLOYMENT INCOME.
24

25 PLAINTIFF shall PREPARE the ORDER.
26

27 Respectfully submitted,
28


Matthew Geiger

26

1 **IT IS FURTHER ORDERED** that each party shall submit the information required in NRS
2 125B.055, NRS 125.130 and NRS 125.230 on a separate form to the Court and the Welfare Division
3 of the Department of Human Resources within ten days from the date this Decree is filed. Such
4 information shall be maintained by the Clerk in a confidential manner and not part of the public
5 record. The parties shall update the information filed with the Court and the Welfare Division of the
6 Department of Human Resources within ten days should any of that information become inaccurate.
7

8 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125.510(6):

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

19 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of October 25,
20 1980, adopted by the 14th Session of the Hague Conference on Private International Law apply if a
21 parent abducts or wrongfully retains a child in a foreign country. The parties are also put on notice
22 of the following provisions in NRS 125.510(8):

23 If a parent of the child lives in a foreign country or has significant commitments in a foreign
24 country:

25 (a) The parties may agree, and the court shall include in the order for custody of the
26 child, that the United States is the country of habitual residence of the child for the purposes
27 of applying the terms of the Hague Convention as set forth in subsection 7.

28 (b) Upon motion of one of the parties, the court may order the parent to post a bond if
the court determines that the parent poses an imminent risk of wrongfully removing or
concealing the child outside the country of habitual residence. The bond must be in an
amount determined by the court and may be used only to pay for the cost of locating the child
and returning him to his habitual residence if the child is wrongfully removed from or
concealed outside the country of habitual residence. The fact that a parent has significant

1 commitments in a foreign country does not create a presumption that the parent poses an
2 imminent risk of wrongfully removing or concealing the child.

3 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125C.200:

4 If custody has been established and the custodial parent intends to move his residence
5 to a place outside of this state and to take the child with him, he must, as soon as
6 possible and before the planned move, attempt to obtain the written consent of the
7 noncustodial parent to move the child from this state. If the noncustodial parent
8 refuses to give that consent, the custodial parent shall, before he leaves this state with
9 the child, petition the court for permission to move the child. The failure of a parent
10 to comply with the provisions of this section may be considered as a factor if a
11 change of custody is requested by the noncustodial parent.


12 **NOTICE IS HEREBY GIVEN** that they are subject to the provisions of NRS 31A and
13 125.450 regarding the collection of delinquent child support payments.

14 **NOTICE IS HEREBY GIVEN** that either party may request a review of child support
15 pursuant to NRS 125B.145

16 DATED this 28th day of December, 2010.


17 
18 DISTRICT COURT JUDGE Ca

19 Respectfully submitted:

20 
21 (Your signature) _____
22 (Your name) Matthew B. Geiger
23 Plaintiff In Proper Person

24 _____
25 (Your signature) _____
26 (Your name) _____
27 Defendant In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA


CLERK OF THE COURT

MATTHEW ROBERT GEIGER,
PLAINTIFF.

VS.

JENNIFER ELISE GORDON,
DEFENDANT.


CASE NO: D-10-430639-D
DEPARTMENT T

NOTICE OF RESCHEDULING OF HEARING

Please be advised that the date, time and location of a hearing set before the **Honorable GAYLE NATHAN** has been changed. The **Return Hearing**, presently scheduled for **March 09, 2011, at 11:00 AM** at 601 North Pecos, has been rescheduled to the **8th day of March, 2011, at 2:00 PM** on the 10th floor of the **Regional Justice Center** located at 200 Lewis Avenue.

HONORABLE GAYLE NATHAN

By:


Caryne Pierce
Judicial Executive Assistant

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CERTIFICATE OF MAILING

I hereby certify that on the above file stamped date:

☒ I mailed, via first-class mail, postage fully prepaid the foregoing Notice of

Rescheduling of Hearing to:

Jennifer Elise Gordon
5133 Teal Petals CT
North Las Vegas NV 89081

Matthew Robert Geiger
8669 Horizon Wind Avenue #103
Las Vegas, NV. 89178

☐ I placed a copy of the foregoing Notice of Rescheduling of Hearing in the appropriate attorney folder located in the Clerk of the Court's Office:



Caryne Pierce
Judicial Executive Assistant
Department T

1 NEOJ
2 (Your name) Matthew R. Geiger
3 (Address) 81269 Horizon wind ave #103
Las Vegas, NV 89178
4 (Telephone) (702) 443-0101
5 (Check one) ☒ Plaintiff/ [] Defendant In Proper Person

FILED
JAN 19 2011
Ok + 11:00
CLERK OF COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

8 Matthew R. Geiger)
9 Plaintiff,)
10 vs.)
11 Jennifer E. Gordon)
12 Defendant.)

CASE NO.: 0-10-430639-0
DEPT. NO.: I

NOTICE OF ENTRY OF ORDER

14 TO: (Other party's name) Jennifer E. Gordon;
(Check one) [] Plaintiff/ ☒ Defendant
15 TO: (Other party's attorney) N/A;
16 (Check one) [] Plaintiff's/ [] Defendant's Attorney

17 PLEASE TAKE NOTICE that an Order was duly entered in the above-referenced case on
18 the (day) 29th day of (month) December, (year) 2010.

20 DATED this (day) 19th day of (month) January, (year) 2011.

21 (Your signature) By: [Signature]
22 _____
23 _____
24 _____

☒ Plaintiff/ [] Defendant In Proper Person



CLERK OF THE COURT

1 CERT

2 (Your Name) Matthew R. Geiger

3 (Address) 8609 Horizon Wind ave. #103

4 Las Vegas, NV 89178

5 (Telephone) (702) 443-0101

6 (Email Address) 433iconworker@gmail.com

7 In Proper Person

8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 Matthew R. Geiger

11 Plaintiff,

12 vs.

13 Jennifer E. Gordon

14 Defendant.

CASE NO.: D-10-430639-D

DEPT NO.: J

15 **CERTIFICATE OF MAILING**

16 I, (name of person who mailed document) Matthew R. Geiger, DO HEREBY
17 declare under penalty of perjury under the law of the State of Nevada that the following is true
18 and correct. That on (month) January (day) 19, (year) 2011 service of the: (check one)

19 ☐ Answer

☐ Opposition

20 ☐ Motion

☒ Other Order

21 was made pursuant to NRCP 5(b) by depositing a copy of same in the U.S. Mail in Las Vegas,
22 Nevada, postage prepaid, addressed as follows:

23 (Print the name and address of the person you mailed the documents to)

24 Jennifer E. Gordon

25 5133 Teal Petals St.

26 N. Las Vegas, NV 89081

27 DATED this 19th day of January, 2011

28 
(Signature)

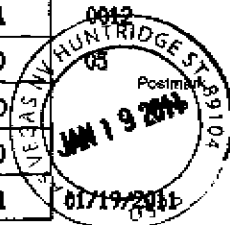
7010 2400 0000 0400 0102

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 UNITED STATES**

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Certified Fee		\$2.80
Return Receipt Fee (Endorsement Required)		\$2.30
Restricted Delivery Fee (Endorsement Required)		\$0.00
Total Postage & Fees	\$	\$5.71



Sent To: Jennifer E. Gordon
 Street, Apt. No.,
 or PO Box No. 5133 Teal Petals St.
 City, State, ZIP+4 N. Las Vegas, NV 89081

PS Form 3800, 3-2004 See Reverse for Instructions

FILED

JAN 20 10 58 AM '11

NCOA

Name: Jennifer Gordon

Address: ~~4047 Meadow~~ 5133 Teal Petals Street Ann L. Johnson
CLERK OF THE COURT

North Las Vegas, NV 89081

Telephone: (702) 631 5504

DISTRICT COURT

CLARK COUNTY, NEVADA

Matthew Geiger

Case No: D-10-430639-D

Plaintiff,

Dept. No: R T

vs

Jennifer Gordon

NOTICE OF CHANGE OF ADDRESS

Defendant.

To: Clerk of Court; and

To: Opposing Counsel or Litigant

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE THAT: (check one)

☐ Plaintiff or ☒ Defendant has a new mailing address.

New Mailing Address: 4047 Meadow Foxtail Dr.


Las Vegas, NV 89122

DATED this 20 day of January, 2009

Jennifer E. Gordon
Your Printed Name

[Signature]
Your Signature

DISTRICT COURT
CLARK COUNTY, NEVADA


CLERK OF THE COURT

MATTHEW ROBERT GEIGER, PLAINTIFF.

VS.

JENNIFER ELISE GORDON, DEFENDANT.

CASE NO: D-10-430639-D
DEPARTMENT T

ORDER SETTING EVIDENTIARY HEARING

PRE-HEARING BRIEF DUE: May 20, 2011

HEARING DATE: May 27, 2011

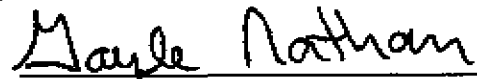
IT IS HEREBY ORDERED that the above-entitled case is set for an Evidentiary Hearing in Department T on **May 27, 2011, at the hour of 9:30 AM** for a period of **one (1) day** at the Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada, in courtroom #10b. If this matter settles, please advise the Court as soon as possible.

IT IS FURTHER ORDERED that a Pre-Hearing Brief be filed on or before **May 20, 2011**. A copy of same is to be hand-delivered to Judge's chambers and served upon opposing counsel or party the same day. The Pre-Hearing Brief shall set forth the issues in a clear and concise manner, the relief requested, along with any relevant case law or statutes in point and authorities format. Failure of an attorney or party to comply with this paragraph may result in a judgment of dismissal, other appropriate judgment, default and/or sanctions being imposed pursuant to EDCR 5.87(c).

IT IS FURTHER ORDERED that all discovery shall be completed no later than **May 13, 2011**. Any and all Exhibits and Witness Lists must be delivered to chambers at least one week prior to Evidentiary Hearing for marking.

1
2 **IT IS FURTHER ORDERED** that no continuances will be granted to either party
3 unless written application is made to the Court, served upon opposing counsel, and a
4 hearing held at least three (3) days prior to the Evidentiary Hearing.
5

6 **DATED:** This 15th day of March, 2011.

7 

8 GAYLE NATHAN
9 District Court Judge
Department T

10
11 **CERTIFICATE OF MAILING**

12 On the above file stamp date, a copy of the foregoing Order Setting Evidentiary
13 Hearing was:

14 ☒ Mailed to Plaintiff Pro Se/Defendant Pro Se.

15
16 Matthew Geiger
17 8669 Horizon Wind Ave. #103
Las Vegas, NV. 89178

18 Jennifer Elise Gordon
19 4047 Meadow Foxtail Dr.
Las Vegas NV 89122

20
21
22 By: 

23 Caryne Pierce
24 Judicial Executive Assistant
25 Department T
26
27
28

DISTRICT COURT
CLARK COUNTY, NEVADA


CLERK OF THE COURT

MATTHEW ROBERT GEIGER,
PLAINTIFF.

VS.

JENNIFER ELISE GORDON,
DEFENDANT.

CASE NO: D-10-430639-D
DEPARTMENT T

NOTICE OF HEARING

TO: Matthew Robert Geiger; Jennifer Elise Gordon

Please be advised that the above-entitled matter has been scheduled for **Return Hearing** to be heard by the Honorable Gayle Nathan at the Regional Justice Center, 200 Lewis Ave, Las Vegas, Nevada, 89155, on the **29th day of March, 2011** at the hour of **3:00 PM** in **Department T**.

YOUR PRESENCE IS NECESSARY.

HONORABLE GAYLE NATHAN

By: 

Caryne Pierce,
Judicial Executive Assistant

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CERTIFICATE OF MAILING

I hereby certify that: 21st day of March, 2011

☒ I mailed, via first-class mail, postage fully prepaid, the foregoing Clerk's Notice Of Hearing to:

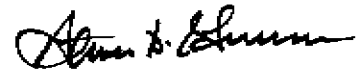
Jennifer Elise Gordon
4047 Meadow Foxtail Dr.
Las Vegas NV 89122

Matthew Robert Geiger
8669 Horizon Wind Ave. #103
Las Vegas, NV. 89178



Caryne Pierce,
Judicial Executive Assistant
Department T

THIS SEALED
DOCUMENT,
NUMBERED PAGE(S)
57 - 87
WILL FOLLOW VIA
U.S. MAIL



CLERK OF THE COURT

1 **NOTC**
2 VEIGA LAW OFFICES, P.C.
3 Soraya M. Veiga, Esq.
4 Nevada State Bar No. 007944
5 7464 W. Sahara Avenue
6 Las Vegas, Nevada 89117
7 (702) 991-7203
8 email: veigalawoffice@cox.net
9 Attorney for Defendant, Jennifer Elise Gordon

7 **DISTRICT COURT**
8 **FAMILY COURT**
9 **CLARK COUNTY, NEVADA**

10 *****

11 MATTHEW ROBERT GEIGER,)	CASE NO. D-010-430639
12 Plaintiff,)	DEPT. NO. T
13 v.)	
14 JENNIFER ELISE GORDON,)	
15 Defendant.)	

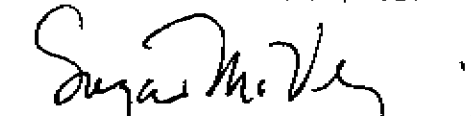
16 **NOTICE OF APPEARANCE**

17 TO: MATTHEW ROBERT GEIGER, Plaintiff

18 PLEASE TAKE NOTICE THAT Soraya M. Veiga, Esq., of the VEIGA LAW
19 OFFICES, P.C., hereby enters her appearance of Defendant, JENNIFER ELISE
20 GORDON.

21 DATED this 17th day of April, 2011

22 VEIGA LAW OFFICES, P.C.

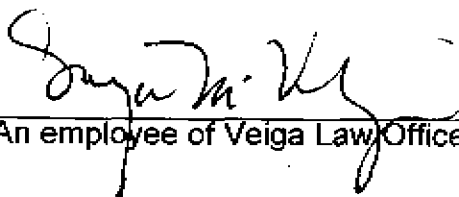
23 
24 SORAYA M. VEIGA, ESQ.
25 Nevada State Bar No.: 7944
26 7464 W. Sahara Avenue
27 Las Vegas, Nevada 89117
28 (702) 991-7203
(702) 228-6135 fax
Email: veigalawoffice@cox.net
Attorney for Defendant,
Jennifer Elise Gordon

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CERTIFICATE OF MAILING

I hereby certify that service of Notice of Appearance was made this 2nd day of April, 2011, via facsimile and by depositing a copy thereof, in a sealed envelope, first class postage prepaid, in the U.S. Mail, addressed to:

Mathew Geiger
8669 Horizon Wind Avenue #103
Las Vegas, Nevada 89178


An employee of Veiga Law Offices, P.C.

Alison D. Blum

CLERK OF THE COURT

1 **SCHD**
2 SORAYA M. VEIGA, ESQ.
3 Nevada Bar No. 7944
4 VEIGA LAW OFFICES, P.C.
5 7464 W. Sahara Avenue
6 Las Vegas, Nevada 89117
7 Telephone (702)991-7203
8 Facsimile (702) 228-6135
9 veigalawoffice@cox.net
10 Attorney for Defendant, Jennifer Elise Gordon

6 **DISTRICT COURT**
7 **FAMILY DIVISION**
8 **CLARK COUNTY, NEVADA**

9 MATTHEW ROBERT GEIGER

10 Plaintiff,

11 vs.

12 JENNIFER ELISE GORDON,

13 Defendant,

CASE NO.: D430639
DEPT.: T

14 **SCHEDULE OF ARREARAGES**

15 STATE OF NEVADA }
16 COUNTY OF CLARK } ss:

17 JENNIFER ELISE GORDON, being first sworn, deposes and says:

18 I am owed and entitled to receive unreimbursed medical expenses from
19 Matthew Robert Geiger pursuant to the Minute Order filed on March 29, 2011 and
20 monthly child support payments of \$433.00 pursuant to the Minute order filed on
21 May 26, 2010. A copy of the Minute Orders are attached to this schedule. Matthew
22 has failed to make all of those payments when due as set forth herein. The following
23 schedule is a true and accurate statement of all payment due dates and of any
24 payments received by me during the months noted. Further, affiant sayeth naught.

25 *Jennifer Elise Gordon*
26 JENNIFER ELISE GORDON

27 Subscribed and Sworn to before me this
28 16th day of May, 2011.

G. Maass-Tyler

State of Nevada
County of Clark
DM




1 Notary Public in and for County and State

<u>Due Date</u>	<u>Payment Amount</u>	<u>Date received</u>	<u>Payment Received</u>	<u>Total Arrearages</u>
6/1/2010	\$216.50	6/1/2010	\$216.50	-0-
6/15/2010	\$216.50	6/15/2010	\$216.50	-0-
7/1/2010	\$216.50	7/1/2010	\$216.50	-0-
7/15/2010	\$216.50	7/15/2010	\$216.50	-0-
8/1/2010	\$216.50	8/1/2010	\$216.50	-0-
8/15/2010	\$216.50	8/15/2010	\$216.50	-0-
9/1/2010	\$216.50	9/1/2010	\$216.50	-0-
9/15/2010	\$216.50	9/15/2010	\$216.50	-0-
10/1/2010	\$216.50	10/1/2010	\$216.50	-0-
10/15/2010	\$216.50	10/15/2010	\$216.50	-0-
11/1/2010	\$216.50	11/1/2010	\$216.50	-0-
11/15/2010	\$216.50	11/15/2011	\$216.50	-0-
12/1/2010	\$216.50	12/1/2010	\$216.50	-0-
12/15/2010	\$216.50	12/15/2010	\$216.50	-0-
1/1/2011	\$216.50	none	none	\$216.50
1/15/2011	\$216.50	none	none	\$433.00
2/1/2011	\$216.50	2/1/2011	\$220.00	\$429.50
2/15/2011	\$216.50	3/9/2011	\$216.50	\$429.50
3/1/2011	\$216.50	3/9/2011	\$216.50	\$429.50
3/15/2011	\$216.50	3/9/2011	\$216.50	\$429.50
4/1/2011	\$216.50	none	none	\$646.00
4/15/2011	\$216.50	none	none	\$862.50
5/1/2011	\$216.50	none	none	\$1,079.00
5/15/2011	\$216.50	none	none	\$1,295.50
<u>TOTAL ARREARAGES IN CHILD SUPPORT</u>				<u>\$1,295.50</u>

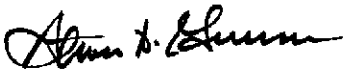
<u>Date</u>	<u>Provider</u>	<u>Payment made By Defendant</u>	<u>Payment made by Plaintiff</u>	<u>Total Arrearages</u>
8/19/2010	Southern Nevada Health	\$50.00	-0-	\$25.00
3/24/2011	Dr. Lowell Snitchler	\$30.00	-0-	\$40.00
3/24/2011	Dr. Lowell Snitchler	\$30.00	-0-	\$55.00
3/30/2011	Dr. Lowell Snitchler	\$30.00	-0-	\$70.00
3/31/2011	Dr. Lowell Snitchler	\$30.00	-0-	\$85.00
4/5/2011	Dr. Lowell Snitchler	\$60.00	-0-	\$115.00
4/12/2011	Dr. Lowell Snitchler	\$60.00	-0-	\$145.00
4/26/2011	Dr. Lowell Snitchler	\$30.00	-0-	\$160.00
5/3/2011	Dr. Lowell Snitchler	\$60.00	-0-	\$190.00
5/11/2011	Southern Nevada Health	\$50.00	-0-	\$215.00
5/12/2011	Dr. Lowell Snitchler	\$60.00	-0-	\$245.00
TOTAL UNREIMBURSED MEDICAL ARREARAGES				<u>\$245.00</u>

Submitted by

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veigalawoffice@cox.net
Attorney for Defendant, Jennifer Elise Gordon



CLERK OF THE COURT

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER

Plaintiff,

vs.

JENNIFER ELISE GORDON,

Defendant.

CASE NO.: D430639
DEPT.: T

DEFENDANT'S PRE-TRIAL MEMORANDUM
STATEMENT OF ESSENTIAL FACTS

Defendant, JENNIFER ELISE GORDON (hereinafter referred to as "Jennifer") and Plaintiff MATTHEW ROBERT GEIGER, (hereinafter referred to as "Matthew") were married on the August 17, 2005, in Las Vegas, Nevada. There are two(2) minor children the issue of this marriage, Weston Curtis Grieger, born November 11, 2001 and Chevy Whalen Greiger, born August 11, 2004. There are no adopted children and Jennifer is not now pregnant.

The parties separated in January 2010. In the past Matthew has threatened to shoot himself and/or Jennifer numerous times. He has doused his truck with gasoline and threatened to blow himself and Jennifer up. On December 8, 2009, the swat team and NLVPD had to secure Jennifer's house because of Matthew's bizarre and crazy behavior, on that date the police confiscated all of Matthew's guns. The following are just a few of the incidents following the parties break-up.

1. On January 18, 2010, Matthew hit himself in the head with a big metal flashlight and said he was calling the cops and blaming Jennifer for hitting him. He had a 6 inch pocket knife and he was trying to stab himself, all this behavior was in front of the parties children.
2. On March 25, 2010, Matthew negotiated a guilty plea agreement, he pled guilty to the possession of controlled substance. His 48 month sentenced was suspended and he was placed on probation for five (5) years.
3. On April 30, 2010, while visiting the children, he took a bunch of pills and was drinking liquor, he began text messaging and sending voice mails that he was going to kill himself. Jennifer called the police and they took him on a Legal 2000 and was held in a mental institution for observation.
4. On May 6, 2010, Jennifer filed for a protective order. On May 25, 2010 a hearing was held and the court extended the protective order until May 26, 2011. Matthew was ordered to pay \$433.00 in child support and was granted ONLY supervised visits with the children. The visits were to be supervised by the paternal grandparents, Curtis and Julie Geiger, Ryan and Sue Plummer or Jim Miley and the supervisors were ordered to be present at all times. On May 26, 2010, Matthew files for divorce.
5. On January 25, 2011, Jennifer filed an incident report because Matthew violated the protective order.

Jennifer has suffered domestic violence at the hands of Matthew on many occasions during the marriage. On March 4, 2005, Matthew was arrested for domestic violence.

On August 30, 2010, the Court ordered the following among other things:

- 1 a. The parties shall share Joint legal custody with Defendant designated
2 as the temporary primary physical custodian.
3 b. Plaintiff's visitation shall be supervised by his roommate, if Plaintiff's
4 roommate is not willing or available the parties shall seek another
5 supervisor or contact chambers for a referral to Donna's house.

6 On November 1, 2010, the Court ordered among other things the following:

- 7 a. That the partial parenting agreement was affirmed, adopted and filed in
8 open court.
9 b. Plaintiff shall file an updated financial disclosure form.
10 c. Mutual behavior order was issued and filed in open court.
11 d. Plaintiff shall have temporary supervised visitation with the minor
12 children, supervision shall be done by a third party at the discretion of
13 the Defendant.

14 On December 14, 2010, the Court ordered among other things the following:

- 15 a. The parties shall share joint legal custody.
16 b. Defendant shall place Plaintiff's contact information on the children's
17 school records and doctor records.
18 c. Parties shall communicate through electronic mail or text messaging.
19 d. Plaintiff is referred for a psychological evaluation. Plaintiff shall be
20 evaluated by a different psychologist. Plaintiff shall choose a
21 psychologist through his health insurance provider. Plaintiff shall
22 contact the court for a referral to a psychologist from the court's
23 provider list if he is unable to locate another psychologist through his
24 insurance provider.
25 e. The children shall be enrolled into counseling through the parties'
26 health insurance. Parties shall mutually agree upon the choice of the
27 counselor. Each party shall supply 3 names to the other party then
28

1 decide on the choice for one counselor. The parties shall advise the
2 counselor to send a report to the court outlining the children's conditions
3 and progress.

- 4 f. The parties shall attend the cooperative parenting and divorce class
5 through the University of Nevada at Las Vegas (UNLV).
6 g. Plaintiff shall prepare and file an updated financial disclosure form
7 and serve a copy to the Defendant.

8 On March 8, 2011, the Court ordered among other things the following:

- 9 a. Mother has authority to choose counselor for the children.
10 b. Schedule of arrears is to be filed.
11 c. Beginning April, 2011, child support to be \$433.00 per month. Once
12 father is employed he is to notify mother and his child support will be
13 25% of his gross monthly income, effective the same month he begins
14 employment.
15 d. Judge Nathan will interview both children herself.
16 e. Mother will bring the children to father's residence between 5:30 and
17 6:00 p.m., father will arrange to have the children returned to mother by
18 7:00 p.m. on Sunday.
19 f. Mother is relieved of any two week notice, if mother or father want to
20 take children for a special event, court will allow negotiations, however,
21 if the parties don't agree, it's not going to happen.
22 g. Neither parent may take children out of State until further Order of this
23 Court.
24 h. Lynn Conant, Esq., is appointed children's Guardian Ad Litem.
25 i. Both parties shall file, submit to chambers and exchange their pre-trial
26 memorandums and tabbed exhibits no later than the close of business,
27 May 17, 2011. Failure to disclose any witnesses and/or provide the
28

1 Court with tabbed exhibits will result in them not being permitted at the
2 time of the evidentiary hearing.

3 On March 29, 2011, the Court ordered among other things the following:

- 4 a. Westin is not to be engaged in any wrestling activities any longer.
5 b. Boys shall sleep on a bed, pullout sofa or a futon, they are not to sleep
6 on the floor.
7 c. Matzi aka Baron is not to physically discipline Westin and Chevy in
8 anyway.
9 d. Parents are never ever to use a belt on children again.
10 e. Any un-reimbursed medical expenses shall be borne equally (50/50)
11 between the parties subject to the 30/30 rule whereby the party
12 incurring the expense shall have 30 days to submit the bill to the other
13 party and that party will have 30 days to reimburse the party incurring
14 the expense for one-half the bill.
15 f. The court will not entertain giving the father one more overnight visit
16 until father has psych evaluation.

17
18 I.
ISSUES UNRESOLVED

19 A. The parties have not yet resolved any of the issues regarding, custody and
20 child support, arrearages, un-reimbursed medical expenses and division of
21 community assets and debts.

22 B. The parties have not yet resolved the issue of sole and separate property.

23 C. The parties have not resolved the issue of sole and separate debt.

24 II.
COMMUNITY ASSETS AND DEBTS

25 The parties will need this Court's assistance to equitably divide their
26 community assets and their liabilities, if any, which issue remains unresolved.
27
28

1 Jennifer proposes the following be awarded to her as her sole and separate property,
2 free from any right or claim of Matthew:

- 3 1. 1988 Grand Marquis, paid in full;
- 4 2. Any and all household furnishings in Jennifer's possession;
- 5 3. Fifty percent (50%) of the value of Matthew's retirement plan including
6 but not limited to any 401k, IRA Roth and/or Trust Administration
7 System Ironworkers Employee Benefits Corp.;
- 8 4. Bank of America Checking Account number ending 1984;
- 9 5. All of Jennifer's clothes, jewelry and other personal effects.

10 Matthew shall be awarded to him as his sole and separate property, free from
11 any right or claim of Jennifer the following:

- 12 1. Any bank account solely under his name;
- 13 2. 2002 Chevy Impala, paid in full;
- 14 3. 1989 GMC Jimmy, subject to any and all fees, debts and
15 encumbrances associated therewith; Matthew shall hold Jennifer
16 harmless from any and all debt or encumbrances related to this
17 automobile;
- 18 4. 2004 Suzuki Motorcycle subject to any and all fees, debts and
19 encumbrances associated therewith; Matthew shall hold Jennifer
20 harmless from any and all debt or encumbrances related to this
21 automobile;
- 22 5. Any and all household furnishings in Matthew's possession;
- 23 6. Fifty percent (50%) of the value of Matthew's retirement plan including
24 but not limited to any 401k, IRA Roth and/or Trust Administration
25 System Ironworkers Employee Benefits Corp. and
26 7. All of Matthew's clothes, jewelry and other personal effects.

COMMUNITY DEBTS

Matthew shall assume, pay, defend indemnify and hold Jennifer harmless from the following debts and obligation, including, without limitation, the following:

1. 100% of all of Matthew's medical bills
2. 100% of any and all mortgages, home equity line of credit or other indebtedness, tax, liability or obligation associated with the property located at 5133 Teal Petals St., N. Las Vegas, Nevada, including but not limited to the debt with Wells Fargo bank for the marital residence that was foreclosed on December 25, 2010.
3. Fifty percent (50%) of \$989.78, the debt with Monitronics of \$44.99 each month from January 2010 until October 2011, when the contract ends, that Jennifer has been paying and it's automatically withdrawn from her checking account each month.
4. Fifty percent (50%) of \$8,808.82, for the minor children's tuition for Mountain View Christian School for the school year 2009-2010 that Jennifer paid for.
5. Fifty percent (50%) of the outstanding balance of \$3,207.32 for the tuition of Mountain View Christian School for the school year 2009-2010.
6. Reimburse Jennifer \$738.42 for premiums that Jennifer paid for Matthew's car insurance from January 2010 until July 2010.
7. Any debt, encumbrance or liability associated with the 1989 GMC Jimmy automobile.
8. Any debt, encumbrance or liability associated with the 2004 Suzuki Motorcycle.
9. Any and all debts, encumbrances or liabilities, not already named herein, which are solely in Matthew's name.

1
2 **SEPARATE ASSETS AND DEBTS**

3 The parties will need this Court's assistance to determine what, if any, assets
4 and debts should be deemed the sole and separate property and/or liability of each
5 party.

6 Jennifer requests that this Court confirm to her the following items as her sole
7 and separate property:

- 8 1. 1990 Cadillac Seville, paid if full;

9 IV.
10 **SPOUSAL SUPPORT**

11 No spousal support

12 V.
13 **MOVE TO WHITTIER CALIFORNIA**

14 Jennifer is an iron worker, at the present time it is almost impossible for
15 Jennifer to find a job in Las Vegas, Nevada. Matthew is also an iron worker and he
16 has also been unable to find a job in Las Vegas. Jennifer has been living of
17 unemployment benefits and food stamps, since the economy took a downturn.

18 For the past year work for iron workers has been booming in the grater Los
19 Angeles area. Los Angeles is part of the district for the Union Ironworker out of Local
20 433. The pay would be the same she was earning in Las Vegas. Jennifer's hourly
21 wage with vacation is \$36.92 per hour.

22 There are several advantages to Jennifer moving to the Greater Los Angeles
23 Area. Once she is working their standard of living will improve she can rent a bigger
24 house . Jennifer has friends that live in the Los Angeles area. The parties minor
25 children have travel to Whittier, California multiple times. The family enjoys the
26 parks, the trails and the small town feeling that Whittier offers. It is a great
27 community with exceptional schools and it is minutes away from the beach. Also,
28 the fact that the children can play outside any time of the year is an advantage, in

1 contrast with Nevada where the extreme high temperatures in the summer restricts
2 the children's activities outdoors.

3 Jennifer has always been and continues to be the primary custodian of the
4 children. At the present time Matthew has "supervised" visitation with the children
5 every weekend.

6 Whittier is close enough to Las Vegas for Matthew to have a visitation
7 schedule with the children that will foster and preserve their relationship. Travel to
8 and from Whittier from Las Vegas is fairly short in distance and inexpensive. It takes
9 anywhere from four to six hours, depending on traffic. It costs approximately \$75.00
10 in gas. Once Matthew has the psychological evaluation as ordered by the court and
11 it is decided that Matthew is not a risk to himself and/or the children, Jennifer
12 proposes visitation in Las Vegas with the children twice a month from Friday evening
13 until Sunday at 3:00 p.m. and extended summer visitation.

14 The move to Whittier will improve Jennifer's and the children's quality of life.
15 At the present time, as stated above, Jennifer is receiving unemployment benefits
16 and food stamps. As an iron worker she will be earning over \$1,100.00 each week.
17 The children are in school all day and will attend an after school program, therefore,
18 the use of babysitter's will be minimized only to when there is no school.

19 Jennifer's housing and environmental living conditions will be greatly
20 enhanced. The greater Los Angeles area has multiple museums, excellent medical
21 facilities it's rich in its cultural life. Whittier's public schools are far superior to Las
22 Vegas public schools.

23 Jennifer's motive are "honorable" and are not designated to frustrate or defeat
24 Matthew's visitation rights. Matthew's current schedule is every weekend and the
25 visits are supervised. Jennifer's proposal that Matthew have visitation with the
26 children two (2) weekends a month and proposes extended visitation with the
27
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1 children in the summer months to make up for the other two weekend visitations
2 Matthew will be forfeiting.

3 Jennifer will comply with the substitute visitation orders. It was Jennifer who
4 voluntarily gave Matthew supervised visitations with the children when the court had
5 granted her temporary sole physical custody of the children.

6
7 **VI.**
ATTORNEY'S FEES AND COSTS

8 Jennifer requests that Matthew shall be responsible for any and all attorney's
9 fees and costs incurred in this action, including her attorney fees and costs, for a
10 total of \$3,700.00.

11
12 **VII.**
LIST OF WITNESSES

- 13
14 1. Defendant, Jennifer Elise Gordon
15 c/o Veiga Law Offices, P.C.
16 7464 W. Sahara Avenue
17 Las Vegas, Nevada 89117
(702) 991-7203
18
19 2. Plaintiff, Matthew Robert Geiger
20 8669 Horizon Wind Avenue #103
21 Las Vegas, Nevada 89178
22 (702) 443-0101
23
24 3. Melissa Snyder
25 2430 Millicroft Drive
26 Henderson, Nevada 89074
27 (702) 272-8753
28 4. Any of Matthew's witnesses
5. Any rebuttal witnesses necessary

Jennifer reserves the right to amend her List of Witnesses up to and including
the time of trial.

VIII.
LIST OF EXHIBITS

Jennifer may offer as exhibits at Trial any and all of the following documents, which are incorporated by these references as though fully set forth herein:

- A. Family Account Statement for the period from 7/1/2009 to 6/17/2010 for Mountain View Christian School.
- B. Payment Breakdown for insurance payments made on vehicles from January 25, 2010 through July 23, 2010.
- C. Bank of America online banking statements from May 27, 2010 to May 4, 2011.
- D. Trust Administration System Ironworkers Employee Benefits Corp.
- E. Receipt signed by Matthew dated May 6, 2011.
- F. Receipts signed by Matthew dated April 8, 2011.
- G. Receipts from Lowell L. Snitcher Ph.D., dated 3/24/11, 3/30/11, 3/31/2011, 4/5/2011, 4/12/2011, 4/26/11, 5/3/11, 5/12/11;
- H. Receipts from Southern Nevada Health District dated 8/19/2010 and May 11, 2011;
- I. Plaintiff's Financial Disclosure Form
- J. East Whittier City Elementary School Rating and comparison with Cunningham Elementary in Las Vegas
- K. Wikipedia information on Whittier, CA. and
- L. Any and all exhibits used by Plaintiff

IX.
UNUSUAL LEGAL OR FACTUAL ISSUES PRESENTED


At this time, Jennifer does not anticipate presenting any unusual legal or factual issues at the time of hearing in this matter.

X.
LENGTH OF TRIAL

Trial is currently scheduled for one (1) day.

DATED this 23rd day of May 2011.

VEIGA LAW OFFICES, P.C.




SORAYA M. VEIGA, ESQ.
Nevada Bar No. 007944
7464 W/ Sahara Avenue
Las Vegas, Nevada 89117
702-991-7203
Attorneys for Defendant,
Jennifer Elise Gordon

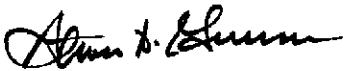
CERTIFICATE OF MAILING

I hereby certify that on the 20th day of May, 2011 I served a true and correct copy of the document entitled: DEFENDANT'S PRE-TRIAL MEMORANDUM in the above-captioned case, by placing a copy in a sealed envelope, first class postage fully prepaid thereon, and by depositing the envelope in the U.S. mail at Las Vegas, Nevada, addressed as follows.

MATTHEW GEIGER
8669 Horizon Wind #103
Las Vegas, Nevada 89178



Employee of Veiga Law Offices, P.C.



CLERK OF THE COURT

SORAYA M. VEIGA, ESQ.
Nevada Bar No. 7944
VEIGA LAW OFFICES, P.C.
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Telephone (702) 991-7203
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Attorney for Defendant, Jennifer Elise Gordon

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER

Plaintiff,

vs.

JENNIFER ELISE GORDON,

Defendant,

CASE NO.: D430639
DEPT.: T

**DEFENDANT'S FIRST AMENDED ANSWER TO COMPLAINT FOR DIVORCE
AND COUNTERCLAIM FOR DIVORCE**

COMES NOW Defendant, JENNIFER ELISE GORDON, by and through her attorney, Soraya M. Veiga, Esq., of the Veiga Law Offices, P.C. and for her Answer to Plaintiff's Complaint for Divorce states as follows:

1. Answering Paragraphs I, II, IV, V, VIII and IX, of Plaintiff's Complaint for Divorce on file herein, Defendant admits each and every allegation contained therein.

2. Answering Paragraphs III, VI, VII, X and XI of Plaintiff's Complaint for Divorce on file herein, Defendant denies each and every allegation contained therein.

COUNTERCLAIM FOR DIVORCE

COMES NOW, Defendant/Counterclaimant, JENNIFER ELISE GORDON (hereinafter referred to as "Jennifer") and states her Counterclaim against Plaintiff/Counterdefendant, MATTHEW ROBERT GEIGER (herein after referred to as "Matthew"), as follows:

I.

1 That Jennifer is now and for more than six (6) weeks prior to the commencement
2 of this action, has been an actual bona fide resident and domiciliary of the County of
3 Clark, State of Nevada, actually and physically residing and being domiciled therein
4 during all of said period of time.

5 II.

6 That Jennifer and Matthew were married on or about August 17, 2005, in Las
7 Vegas, Nevada, and have ever since been husband and wife.

8 III.

9 That since said marriage, Jennifer and Matthew have become and are
10 incompatible, such that their tastes, natures, views, likes and dislikes have become
11 widely separate and divergent so that the parties have been and now are incompatible
12 to such an extent that it now appears that there is no possibility of reconciliation
13 between Jennifer and Matthew and there remains such an incompatible temperament
14 between Jennifer and Matthew that a happy marital status can no longer exist.

15 IV.

16 That there are two (2) minor children born of the marriage, to wit: Weston Curtis
17 Grieger, born November 11, 2001 and Chevy Whalen Greiger, born August 11, 2004.
18 There are no adopted children and Jennifer is not now pregnant.

19 V.

20 That Jennifer is a fit and proper person to be awarded sole legal and sole
21 physical custody of the minor children, subject to supervised visitation by Matthew.

22 VI.

23 That Jennifer may move with the two minor children to California.

24 VII.

25 Pursuant to NRS 125B.070 and NRS 125B.080, Matthew should pay each
26 month 25% of his monthly income for the support and maintenance of the minor children
27
28

1 until such time as the children reach the age of eighteen (18) years or nineteen (19)
2 years, if still in high school, marries, or becomes otherwise emancipated.

3 VIII.

4 That the minor children of the parties are entitled to the provision of medical
5 insurance by Matthew, including psychological, psychiatric, dental and optical insurance,
6 as well as hospitalization insurance; and payment of said minor child's medical,
7 including psychiatric, dental and optical costs, which are not covered by said insurance
8 shall be equally shared by Jennifer and Matthew.

9 IX.

10 That there is community property of the parties, the exact amounts and
11 descriptions of which are unknown to Jennifer at this time, that Jennifer prays leave of
12 Court to amend this Counterclaim to insert the same herein when such property has
13 been ascertained or at the time of trial in this matter; that this Court should make an
14 equitable distribution of such property

15 X.

16 That there are community and joint debts of the parties, the full nature and
17 extent of which are unknown to Jennifer this time, that Jennifer prays leave of Court
18 to amend this Counterclaim to insert the same herein when such debts have been
19 ascertained or at the time of trial in this matter; and the same should be equitably
20 adjudicated by this Court.

21 XI.

22 That there may be separate debt incurred by Matthew during the marriage of
23 the parties, without the knowledge or consent of Jennifer, the exact amounts and
24 descriptions of which are unknown to her at this time. She prays leave of Court to
25 amend this Counter Complaint to insert the same when they have become known to
26 her at the time of trial in this matter and that this Court should assess these debts to
27 Matthew as his sole and separate debt
28

1 XII.

2 That Jennifer shall claim the minor children each and every year for tax
3 purposes.

4 XIII.

5 That both parties give up any and all right to spousal support

6 XIV

7 That Jennifer shall retain her maiden name of "Gordon"

8 XV.

9 That Jennifer has been forced to hire an attorney to prosecute this action and
10 is, therefore, entitled to an award of attorney's fees and costs.

11
12 **WHEREFORE**, Defendant/Counterclaimant, Jennifer prays for judgment as
13 follows:

14 1. That Plaintiff/Counterdefendant, Matthew Geiger, take nothing by way of
15 his Complaint on file herein;

16 2. That the bonds of matrimony now and heretofore existing between
17 Defendant/Counterclaimant, Jennifer E. Gordon and Plaintiff/Counterdefendant,
18 Matthew R. Geiger be dissolved, that Defendant/Counterclaimant, Jennifer E. Gordon
19 be granted an absolute Decree of Divorce, and that the parties hereto be released from
20 all the obligations thereof and restored to the status of single persons;

21 3. That Jennifer be awarded sole legal and sole physical custody of the
22 parties' minor children, subject to supervised visitation by Matthew;

23 4 That Pursuant to NRS 125B.070 and NRS 125B.080, Matthew be ordered
24 to pay each month 25% of his monthly income for the support and maintenance of the
25 minor children until such time as the children reach the age of eighteen (18) years or
26 nineteen (19) years, if still in high school, marries, or becomes otherwise emancipated;

27 5. That Matthew be ordered to provide and maintain medical insurance,
28

1 including psychological, dental and optical insurance, as well as hospitalization
2 insurance, and payment of said minor child's medical, including psychiatric, dental and
3 optical costs, which are not covered by said insurance shall be equally shared by
4 Jennifer and Matthew;

5 6. That neither party shall pay alimony one to the other;

6 7. That the Court make a fair and equitable distribution as to the community
7 property of the parties;

8 8. That the Court make a fair and equitable distribution as to the community
9 obligations of the parties;

10 9. That all debt Matthew incurred during the marriage without the knowledge
11 or consent of Jennifer be assessed to Matthew as his sole and separate debt;

12 10. That Jennifer shall claim the minor children each and every year for tax
13 purposes;

14 11. That Jennifer shall retain her maiden name of "Gordon"

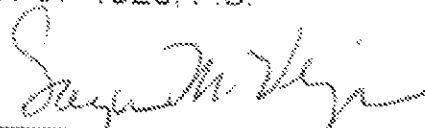
15 12. That Matthew be ordered to pay Jennifer's attorneys a reasonable sum as
16 and for their fee for services rendered to Jennifer herein, plus costs of suit;

17 13. For such other and further relief as the Court may deem just and proper
18 in the premises.

19
20 DATED this 23rd day of May, 2011.

21 VEIGA LAW OFFICES, P.C.

22
23 By


SORAYA M. VEIGA, ESQ.

24 Nevada Bar No. 007944

25 7464 W. Sahara Avenue

26 Las Vegas, NV 89117

(702) 991-7203

27 Attorneys for Defendant/Counterclaimant,
28 Jennifer E. Gordon

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VERIFICATION

STATE OF NEVADA }
COUNTY OF CLARK } ss:

JENNIFER E. GORDON, being first duly sworn, upon oath, hereby
deposes and states as follows:

That your Affiant is the Defendant/Counterclaimant in the above and foregoing
action; that I have read the foregoing, DEFENDANT'S FIRST AMENDED ANSWER TO
COMPLAINT FOR DIVORCE AND COUNTERCLAIM FOR DIVORCE, and hereby state
that the same is true to the best of my own personal knowledge; except for those
matters therein contained stated on information and belief, and as for those matters I
believe them to be true as well.

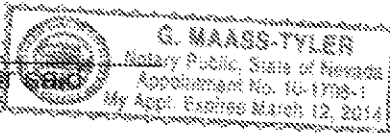
DATED this 23 day of May, 2011.


JENNIFER E. GORDON

SUBSCRIBED and SWORN to before me

this 23rd day of May, 2011.


NOTARY PUBLIC in and for
County and State

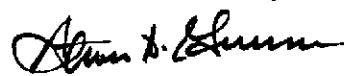


CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that I am an employee of VEIGA LAW OFFICES, P.C., and that on the 23rd day of May, 2011, I did serve the above and foregoing DEFENDANT'S FIRST AMENDED ANSWER TO COMPLAINT FOR DIVORCE AND COUNTERCLAIM, by depositing a true and correct copy of the same in the U. S. Mail, at Las Vegas, Nevada, in a sealed envelope with postage fully pre-paid, a true and correct copy to:

MATTHEW GEIGER
8669 Horizon Wind #103
Las Vegas, Nevada 89178


AN EMPLOYEE OF VEIGA LAW OFFICES, P.C.



CLERK OF THE COURT

1 VEIGA LAW OFFICES, P.C.
2 Soraya M. Veiga, Esq.
3 Nevada State Bar No. 007944
4 7464 W. Sahara Avenue
5 Las Vegas, Nevada 89117
6 (702) 991-7203
7 email: veigalawoffice@cox.net
8 Attorney for Defendant, Jennifer Elise Gordon

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DISTRICT COURT
FAMILY COURT
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,)	CASE NO. D-010-430639
Plaintiff,)	DEPT. NO. T
v.)	
JENNIFER ELISE GORDON,)	
Defendant.)	

LIST OF WITNESSES & EXHIBITS

TO: Matthew Robert Geiger, in proper person.

YOU, WILL PLEASE TAKE NOTICE that Jennifer Elise Gordon intends to call
the following witnesses at the in her case:

1. Defendant, Jennifer Elise Gordon
c/o Veiga Law Offices, P.C.
7464 W. Sahara Avenue
Las Vegas, Nevada 89117
(702) 991-7203
2. Plaintiff, Matthew Robert Geiger
8669 Horizon Wind Avenue #103
Las Vegas, Nevada 89178
(702) 443-0101
3. Melissa Snyder
2430 Millicroft Drive
Henderson, Nevada 89074
(702) 272-8753

1 4. Any of Matthew's witnesses

2 5. Any rebuttal witnesses necessary

3 Jennifer reserves the right to amend her List of Witnesses up to and including the
4 time of trial.

5
6 Jennifer Elise Gordon may introduce the following exhibits in her case:

7 1. Family Account Statement for the period from 7/1/2009 to 6/17/2010 for Mountain
View Christian School.

8 2. Payment Breakdown for insurance payments made on vehicles from January 25,
9 2010 through July 23, 2010.

10 3. Bank of America online banking statements from May 27, 2010 to May 4, 2011.

11 4. Trust Administration System Ironworkers Employee Benefits Corp.

12 5. Receipt signed by Matthew dated May 6, 2011.

13 6. Receipts signed by Matthew dated April 8, 2011.

14 7. Receipts from Lowell L. Snitcher Ph.D., dated 3/24/11, 3/30/11, 3/31/2011,
4/5/2011, 4/12/2011, 4/26/11, 5/3/11, 5/12/11;

15 8. Receipts from Southern Nevada Health District dated 8/19/2010 and May 11,
16 2011;

17 9. Plaintiff's Financial Disclosure Form;

18 10. East Whittier City Elementary School
Rating and comparison with
19 Cunningham Elementary in Las
Vegas;

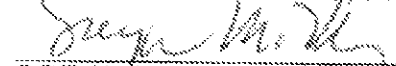
20 11. Wikipedia information on Whittier, CA.

21 12. Any and all exhibits used by Plaintiff;

22 DATED this 22nd day of May, 2011.

23 Respectfully submitted,

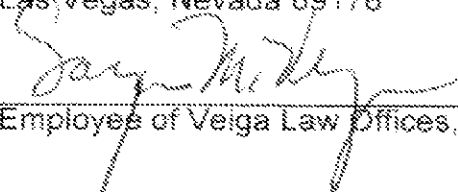
24 VEIGA LAW OFFICES, P.C.

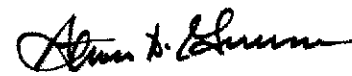
25 
26 SORAYA M. VEIGA, ESQ.
27 Nevada Bar No. 007944
7464 W. Sahara Avenue
Las Vegas, Nevada 89117
28 (702) 991-7203
Attorney for Defendant

1
2 CERTIFICATE OF MAILING

3 I hereby certify that on the 27th day of May, 2011 I served a true and correct
4 copy of the document entitled: NOTICE OF WITNESSES AND LIST OF EXHIBITS in
5 the above-captioned case, by placing a copy in a sealed envelope, first class postage
6 fully prepaid thereon, and by depositing the envelope in the U.S. mail at Las Vegas,
7 Nevada, addressed as follows:

8
9 MATTHEW GEIGER
10 8689 Horizon Wind #103,
11 Las Vegas, Nevada 89178

12 
13 _____
14 Employee of Veiga Law Offices, P.C.
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CLERK OF THE COURT

1 **NOTC**
2 **JOSEPH A. SCALIA, LTD.**
3 Joseph A. Scalia, II, Esq.
4 Nevada Bar No. 5123
5 845 N. Eastern Avenue
6 Las Vegas, NV 89101
7 (702) 678-6000
8 Attorney for Defendant,
9 **MATTHEW GEIGER**

10
11 **DISTRICT COURT, FAMILY DIVISION**
12 **CLARK COUNTY, NEVADA**

13 JENNIFER E. GORDON,

14 Plaintiff,

15 vs.

16 MATTHEW GEIGER

17 Defendant.

)
) CASE NO.: D 10 430639 D
) DEPT. NO: T
)

) DATE OF HEARING: 5-27-2011
) TIME OF HEARING: 9:30am
)

18 **NOTICE OF APPEARANCE**

19 COMES NOW JOSEPH A. SCALIA, II, ESQ., from the law firm of JOSEPH A.
20 SCALIA, LTD., and enters his appearance on behalf of MATTHEW GEIGER, Defendant, in the
21 above-captioned case and pursuant to EDCR 7.40 gives notice that JOSEPH A. SCALIA, ESC.,
22 will be the counsel of record for MATTHEW GEIGER.

23 ///

24 ///


25 ///

1
2 JOSEPH A. SCALIA, ESQ., provides the following information to which service may be made.

3 JOSEPH A. SCALIA, LTD.
4 845 N. Eastern Ave.
5 Las Vegas, Nevada 89101
6 Telephone: (702)678-6000
Facsimile: (702)471-7087

7 DATED this 25th day of May, 2011.

8 JOSEPH A. SCALIA, LTD.

9 
10 Joseph A. Scalia, II, Esq.

11 Nevada Bar No. 5123
12 845 N. Eastern Ave
13 Las Vegas, NV 89101
14 (702) 678-6000
15 Attorney for Plaintiff
16 BRADFORD SKELTON

17 **CERTIFICATE OF MAILING**

18 I HEREBY CERTIFY that I am an employee of the law firm of JOSEPH A. SCALIA,
19 LTD., and that on the 25th day of May, 2011, I did deposit in the United States Mail, in a sealed
20 envelope with postage fully prepaid thereon, and served via facsimile, a true and correct copy of
21 the foregoing, in the above-entitled matter, addressed as follows:

22 Veiga Law Office
23 Soraya M. Veiga, Esq.
24 7464 W. Sahara Ave
25 Las Vegas, NV 89117

26 
27 An Employee of Joseph A. Scalia, Ltd.
28



DISTRICT COURT
CLARK COUNTY, NEVADA

FILED IN OPEN COURT

May 27 2014
Steven Grierson, Clerk of the Court

By: Michael A. Jank Deputy

Case No: D-10-430635-0

Department: T

Matthew R. Geiger Plaintiff,

-vs-

Jennifer E. Gordon Defendant.

ORDER FOR SUPERVISED VISITATION

The Court finds that it is in the best interest of the parties' child(ren) that the Plaintiff's Defendant's visitation be supervised pursuant to this Order. Therefore, (circle one)

IT IS HEREBY ORDERED that because the Court finds that the parties have not or cannot pick up and drop off their child(ren) for visitation at an agreeable location in a fashion that is safe for the child(ren) physically and/or emotionally, the parties shall utilize Open Arms Visitation Center, LLC services.

IT IS FURTHER ORDERED that the visitation schedule will be in effect as of (date) immediately provided BOTH parties complete orientation, for thirty (30)/ sixty (60)/ ninety (90) days and will occur as follows:

Visitations will occur as follows:					
<input checked="" type="checkbox"/> Weekly <input type="checkbox"/> Every other week		<input type="checkbox"/> 1 hour <input type="checkbox"/> 2 hours <input checked="" type="checkbox"/> 3-4 hours			
Mon / Tues / Wed / Thurs		Fri / Sat		Sunday	
8:30 - 9:30 am	2:30 - 3:30 pm	8:30 - 9:30 am	2:30 - 3:30 pm	9:30 - 10:30 am	2:00 - 3:00 pm
10:00 - 11:00 am	4:00 - 5:00 pm	10:00 - 11:00 am	4:00 - 5:00 pm	11:00 - 12:00 pm	3:30 - 4:30 pm
11:30 - 12:30 pm	5:30 - 6:30 pm	11:30 - 12:30 pm	5:30 - 6:30 pm	12:30 - 1:30 pm	5:00 - 6:00 pm
1:00 - 2:00 pm		1:00 - 2:00 pm	7:00 - 8:00 pm		

IT IS FURTHER ORDERED. At such time as Mom relocates to California, it shall be the 2nd or 4th week of every month

IT IS FURTHER ORDERED that the parties shall contact Open Arms (702) 570-6300 to schedule orientation. Failure to contact Open Arms may result in the family's inability to use said services, and the Court may issue sanctions against the responsible party or parties.

IT IS FURTHER ORDERED that the cost of said services is \$35.00 per supervised visitation hour:

- 1) Fee shall be paid equally by both parties (i.e., \$17.50 per hour by each party); or
- 2) ☒ Plaintiff ☒ Defendant shall pay the whole amount of \$35 per supervised visitation hour; or
- 3) Fee for supervised visitation shall be provided through Open Arms Charity Care Program.

Said payments shall be paid directly to Open Arms Visitation Center, LLC 3630 N Rancho Dr, Ste #107 Las Vegas, Nevada 89130. Said payment shall be made no later than the date of the visitation. Failure to pay may result in cancellation of the scheduled monitored visitation and the Court may issue sanctions against the responsible party or parties.

IT IS FURTHER ORDERED that the parties shall follow all rules and directives of Open Arms. Failure to follow all rules and directives may result in the immediate termination of services and the Court may issue sanctions against the responsible party or parties.

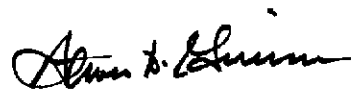
This matter is reset for:

Date: 6/10/14 Time: 9/10

Attorney for Plaintiff: Chris Aaron

Attorney for Defendant: Seraya M. Veiga

DISTRICT JUDGE/ COMMISSIONER
GAYLE NATHAN



CLERK OF THE COURT

NOPC
ROCHELEAU LAW GROUP
Margaret E. Pickard, Esq.
Nevada Bar No. 11855
NevadaMediator@gmail.com
725 South Eighth Street, Suite B
Las Vegas, Nevada 89101
702-914-0400
702-914-0256 (fax)
Attorney for Plaintiff

**DISTRICT COURT, FAMILY DIVISION
CLARK COUNTY, NEVADA**

MATTHEW ROBERT GEIGER,

Plaintiff,

vs.

JENNIFER ELISE GORDON,

Defendant.

CASE NO.: D-10430639-D

DEPT. NO.: T

**NOTICE OF SEMINAR COMPLETION
EDCR 5.07-FAMILY**

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UNLV | CONTINUING EDUCATION

DIVISION OF EDUCATIONAL OUTREACH

June 8, 2011

Judge Gayle Nathan
Family Court Division, Department T
Family Courthouse
601 N. Pecos
Las Vegas, Nevada 89155

Re: Jennifer Gordon
Matthew Robert Geiger, Plaintiff. vs. Jennifer Elise Gordon, Defendant,
Case No. D-10-430639-D

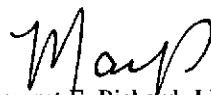
Dear Judge Nathan,

This letter is to confirm that the following individual has completed the UNLV Cooperative Parenting Program, offered through the UNLV Division of Educational Outreach:

Jennifer Gordon

Please do not hesitate to contact me if you need additional information. Thank you for your referral to this program.

Sincerely,



Margaret E. Pickard, J.D.
Program Facilitator
702.373.1566
margaretpickard@aol.com

Cooperative Parenting:

1 ORDR
2
3
4



CLERK OF THE COURT

5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7 Matthew Robert Geiger, Plaintiff.
8 vs.
9 Jennifer Elise Gordon, Defendant.

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

10 **ORDER FROM HEARING**
11

12 TO: LITIGANTS IN PROPER PERSON

13 YOU WILL PLEASE TAKE NOTICE that review of the court file indicates
14 that a hearing was held on May 17, 2011. Plaintiff appeared in proper person,
15 Defendant appeared with her attorney Soraya Veiga, Esq. and no Order was
16 prepared following said hearing. Therefore, this Court will prepare said
17 paperwork as follows:
18

19 IT IS HEREBY ORDERED that the attached copy of the Minutes from the
20 May 17, 2011 hearing is hereby incorporated herein and will become the Order of
21 this case.

22 DATED this 27th day of June, 2011.
23



24
25 **GAYLE NATHAN**
26 **DISTRICT JUDGE, DEPT T**

27 Prepared by the Court
28

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****May 17, 2011**

D-10-430639-D Matthew Robert Geiger, Plaintiff.
 vs.
 Jennifer Elise Gordon, Defendant.

May 17, 2011 3:00 PM Return Hearing

HEARD BY: Nathan, Gayle **COURTROOM:** RJC Courtroom 10A

COURT CLERK: Lucinda Tail

PARTIES: Chevy Geiger, Subject Minor,
 not present
 Jennifer Gordon, Defendant, Soraya Veiga, Attorney,
 Counter Claimant, present present
 Lynn Conant, Guardian Ad
 Litem, present
 Matthew Geiger, Plaintiff, Pro Se
 Counter Defendant, present
 Weston Geiger, Subject Minor,
 not present

JOURNAL ENTRIES

- RETURN HEARING RE: PSYCHOLOGICAL EVALUATION/COUNSELING/CHILD INTERVIEW REPORT and PARENTING CLASS

Plaintiff present in Proper Person. Defendant appeared with her Counsel, Soraya M. Veiga, Nevada Bar No. 7944 and Guardian Ad Litem, Lynn Conant also present.

Ms. Conant gave a brief update on her recent time with the boys, which included going out for pizza with them and their mother on March 18, 2011. She further reported during dinner, Westin's eyes watered a great deal, and he did not appear to be crying, therefore, Ms. Conant requested mother seek proper medical attention for him. The boys also had new buzz haircuts and Ms. Conant noticed a big scar or cut on Chevy's head approximately two inches long.

Ms. Conant then followed mother to her residence with the children and there were a total of seven (7) children in the home that day. She further noticed there were a total of seven (7) beds in the home.

PRINT DATE:	05/26/2011	Page 1 of 3	Minutes Date:	May 17, 2011
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Although, on at least five (5) different occasions Ms. Conant did try to contact father to spend time with him and the boys, she never could reach him to pinpoint a date. She did speak with him today prior to the hearing and they are trying to arrange something for this weekend. Ms. Conant advised she has also received the children's medical records from their treating therapists.

Chevy has had six (6) sessions with his therapist and Westin has had five (5) sessions. Court inquired as to whether either parent has been involved in the counseling sessions and mother reported she had.

Court further inquired if father has had his required evaluation yet. Father advised he has an appointment this coming Wednesday at five pm, and advised his current therapist he needs to meet with a new therapist.

Court advised she has reviewed the CPS records from a January, 2011 investigation and the allegations have been found to be UNSUBSTANTIATED.

Discussion and Argument regarding mother NOT having children on Mother's Day. Attorney Veiga said mother did NOT waive her time with children on Mother's Day and that was an error in the Parenting Plan, by not addressing that particular day. When mother asked to have the boys for Mother's Day, father's reply was "no", therefore, Counsel requests that mother have the children on Father's Day.

Counsel advised a schedule of arrearages was filed, which shows father is \$1,295.50 in child support arrears and \$245.00 behind in medical arrears. Counsel served father with a copy of these documents in Court.

Counsel further addressed SUPERVISED VISITATION which is not being followed by the father.

Father provided money orders for mother in court in the amounts of \$840.00 and \$180.00, for a total of \$1,020.00.

Following discussion, COURT ORDERED:

the Partial Parenting Plan shall be MODIFIED to include Mother's Day each and everyday thereafter, and to mirror the order for Father's Day.

Mother's Day and Father's Day visitation will begin on the Friday preceding the Holiday and end at 7:00 pm on the day of the Holiday.

Mother shall have the children this weekend (May 21 - May 22, 2011) with the following weekend resuming regular SUPERVISED visitation for father.

PRINT DATE:	05/26/2011	Page 2 of 3	Minutes Date:	May 17, 2011
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D-10-430639-D

Father shall have the children on Father's Day.

Ms. Conant addressed the Court and advised she is NOT seeking any fees in this matter, Court advised her how much that it is appreciated by all involved.

INTERIM CONDITIONS:

FUTURE HEARINGS: May 27, 2011 9:30 AM Evidentiary Hearing
RJC Courtroom 10B
Tait, Lucinda
Nathan, Gayle

PRINT DATE:	05/26/2011	Page 3 of 3	Minutes Date:	May 17, 2011
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CLERK OF THE COURT

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DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Matthew Robert Geiger, Plaintiff,
vs.
Jennifer Elise Gordon, Defendant.

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

NOTICE OF ENTRY OF ORDER FROM HEARING

TO: ALL PARTIES AND/OR THEIR ATTORNEYS

Please take note that after a review of the court file, an Order was prepared by the Court following a scheduled hearing. A copy of the Order from Hearing is attached hereto. I hereby certify that I caused on the above file stamped date, a copy of the within **Order from Hearing** to be:

Mailed postage prepaid, addressed to the following litigants in Proper Person:

Soraya Veiga, Esq.
7464 W Sahara Ave.
Las Vegas NV 89117

Chris Aaron, Esq.
845 N. Eastern
Las Vegas, NV. 89101

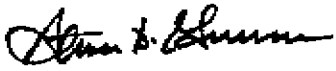
DATED: This 27th day of June, 2011.



Caryne Pierce
Judicial Assistant, Department T

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ORDR


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.: T


ORDER FROM HEARING

TO: LITIGANTS IN PROPER PERSON

YOU WILL PLEASE TAKE NOTICE that review of the court file indicates that a hearing was held on May 17, 2011. Plaintiff appeared in proper person, Defendant appeared with her attorney Soraya Veiga, Esq. and no Order was prepared following said hearing. Therefore, this Court will prepare said paperwork as follows:

IT IS HEREBY ORDERED that the attached copy of the Minutes from the May 17, 2011 hearing is hereby incorporated herein and will become the Order of this case.

DATED this 27th day of June, 2011.


GAYLE NATHAN
DISTRICT JUDGE, DEPT T

Prepared by the Court

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****May 17, 2011**

D-10-430639-D Matthew Robert Geiger, Plaintiff.
vs.
Jennifer Elise Gordon, Defendant.

May 17, 2011 3:00 PM Return Hearing

HEARD BY: Nathan, Gayle **COURTROOM:** RJC Courtroom 10A

COURT CLERK: Lucinda Tail

PARTIES: Chevy Geiger, Subject Minor,
not present
Jennifer Gordon, Defendant, Soraya Veiga, Attorney,
Counter Claimant, present present
Lynn Conant, Guardian Ad
Litem, present
Matthew Geiger, Plaintiff, Pro Se
Counter Defendant, present
Weston Geiger, Subject Minor,
not present

JOURNAL ENTRIES

- RETURN HEARING RE: PSYCHOLOGICAL EVALUATION/COUNSELING/CHILD INTERVIEW REPORT and PARENTING CLASS

Plaintiff present in Proper Person. Defendant appeared with her Counsel, Soraya M. Veiga, Nevada Bar No. 7944 and Guardian Ad Litem, Lynn Conant also present.

Ms. Conant gave a brief update on her recent time with the boys, which included going out for pizza with them and their mother on March 18, 2011. She further reported during dinner, Westin's eyes watered a great deal, and he did not appear to be crying, therefore, Ms. Conant requested mother seek proper medical attention for him. The boys also had new buzz haircuts and Ms. Conant noticed a big scar or cut on Chevy's head approximately two inches long.

Ms. Conant then followed mother to her residence with the children and there were a total of seven (7) children in the home that day. She further noticed there were a total of seven (7) beds in the home.

PRINT DATE:	05/26/2011	Page 1 of 3	Minutes Date: May 17, 2011
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Although, on at least five (5) different occasions Ms. Conant did try to contact father to spend time with him and the boys, she never could reach him to pinpoint a date. She did speak with him today prior to the hearing and they are trying to arrange something for this weekend. Ms. Conant advised she has also received the children's medical records from their treating therapists.

Chevy has had six (6) sessions with his therapist and Westin has had five (5) sessions. Court inquired as to whether either parent has been involved in the counseling sessions and mother reported she had.

Court further inquired if father has had his required evaluation yet. Father advised he has an appointment this coming Wednesday at five pm, and advised his current therapist he needs to meet with a new therapist.

Court advised she has reviewed the CPS records from a January, 2011 investigation and the allegations have been found to be UNSUBSTANTIATED.

Discussion and Argument regarding mother NOT having children on Mother's Day. Attorney Veiga said mother did NOT waive her time with children on Mother's Day and that was an error in the Parenting Plan, by not addressing that particular day. When mother asked to have the boys for Mother's Day, father's reply was "no", therefore, Counsel requests that mother have the children on Father's Day.

Counsel advised a schedule of arrearages was filed, which shows father is \$1,295.50 in child support arrears and \$245.00 behind in medical arrears. Counsel served father with a copy of these documents in Court.

Counsel further addressed SUPERVISED VISITATION which is not being followed by the father.

Father provided money orders for mother in court in the amounts of \$840.00 and \$180.00, for a total of \$1,020.00.

Following discussion, COURT ORDERED:

the Partial Parenting Plan shall be MODIFIED to include Mother's Day each and everyday thereafter, and to mirror the order for Father's Day.

Mother's Day and Father's Day visitation will begin on the Friday preceding the Holiday and end at 7:00 pm on the day of the Holiday.

Mother shall have the children this weekend (May 21 - May 22, 2011) with the following weekend resuming regular SUPERVISED visitation for father.

D-10-430639-D


Father shall have the children on Father's Day.

Ms. Conant addressed the Court and advised she is NOT seeking any fees in this matter, Court advised her how much that it is appreciated by all involved.

INTERIM CONDITIONS:

FUTURE HEARINGS: May 27, 2011 9:30 AM Evidentiary Hearing
RJC Courtroom 10B
Tait, Lucinda
Nathan, Gayle

PRINT DATE:	05/26/2011	Page 3 of 3	Minutes Date	May 17, 2011
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CLERK OF THE COURT

1 **WOA**
2 **JOSEPH A. SCALIA, LTD.**
3 **JOSEPH A. SCALIA, II, ESQ.**
4 Nevada Bar No. 5123
5 845 N. Eastern Avenue
6 Las Vegas, NV 89101
7 Phone: (702) 678-6000
8 Fax: (702) 471-7087
9 *Attorney for Plaintiff*

10 **EIGHTH JUDICIAL DISTRICT COURT**

11 **FAMILY DIVISION**

12 **CLARK COUNTY, NEVADA**

13 **MATTHEW R. GEIGER,**
14
15 **Plaintiff,**

Case Number: D-10-430639-D

Department: T

16 vs.

17 **JENNIFER E. GORDON,**
18
19 **Defendant.**

20 **WITHDRAWAL OF ATTORNEY**

21 **TO: MATTHEW R. GEIGER, Plaintiff;**

22 **TO: JENNIFER E. GORDON, Defendant in proper person**

23 **TO: ALL OTHER INTERESTED PARTIES:**

24 Rule 46, NEVADA SUPREME COURT RULES states in pertinent part:

25 After judgment or final determination, an attorney may withdraw as attorney of record at
26 any time upon the attorney's filing a withdrawal, with or without the client's consent.

27 An Order having been entered by the Court on the 27th day of June 2011, a which is fully
28 incorporated herein by reference, and in accordance with the provisions of SUPREME COURT
RULE 46, WITHDRAWAL OR CHANGE OF ATTORNEY:

PLEASE TAKE NOTICE that Joseph A. Scalia, Esq. of the Joseph A. Scalia, Ltd.,
hereby withdraws as attorney for MATTHEW R. GEIGER.

JOSEPH A. SCALIA, LTD.
845 N. Eastern Avenue
Las Vegas, NV 89101
PH: (702) 678-6000 • FAX: (702) 471-7087

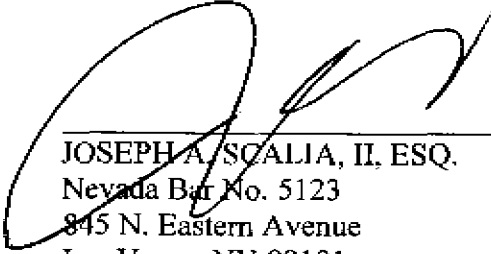
1 The last known mailing address and telephone number of the Parties is as follows:

2 Matthew Geiger
3 8669 Horizon Wind Avenue
4 Las Vegas, Nevada 89178

Jennifer E. Gordon
Confidential Address

5 Dated this 18th day of August, 2011.

6 **JOSEPH A. SCALIA, LTD.**

7 
8
9 JOSEPH A. SCALIA, II, ESQ.
10 Nevada Bar No. 5123
11 845 N. Eastern Avenue
12 Las Vegas, NV 89101
13 Phone: (702) 678-6000
14 Fax: (702) 471-7087
15 Attorney for Plaintiff

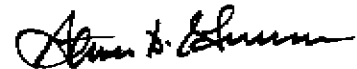
14 **CERTIFICATE OF MAILING**

15 I HEREBY CERTIFY that on the ~~18~~^{19th} day of August, 2011, pursuant to NRCP 5(b), I
16 deposited in the United States Mail at Las Vegas, Nevada, postage prepaid, a true and correct
17 copy of the foregoing **WITHDRAWAL OF ATTORNEY** addressed to:

18
19 Matthew Geiger
20 8669 Horizon Wind Avenue
21 Las Vegas, Nevada 89178

22 Soraya M. Veiga
23 7464 West Sahara Avenue
24 Las Vegas, NV 89117
25 Attorney for Defendant

26 
27 An employee of JOSEPH A. SCALIA, LTD.
28



CLERK OF THE COURT

SORAYA M. VEIGA, ESQ.
Nevada Bar No. 7944
VEIGA LAW OFFICES, P.C.
7464 W. Sahara Avenue
Las Vegas, Nevada 89117
Telephone (702) 991-7203
Facsimile (702) 228-6135
veigalawoffice@cox.net
Attorney for Defendant, Jennifer Elise Gordon

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER

Plaintiff,

vs.

JENNIFER ELISE GORDON,

Defendant,

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

DECREE OF DIVORCE

This matter came to prove up for divorce on May 27, 2011, Plaintiff, Matthew Robert Geiger, was present, and was represented by and through his attorney of record, Chris A. Aaron, of the Law Office of Joseph A. Scalia, LTD, and Defendant, Jennifer Elise Gordon, was present, and was represented by her attorney of record, Soraya M. Veiga, Esq., of the Veiga Law Offices, P.C..

The parties having stipulated to the contents of this *Decree of Divorce*; the Court having examined the evidence submitted herein; and the Court being fully advised as to the law and facts of this case, **FINDS:**

That the Court has complete jurisdiction in the premises, both as to the subject matter hereof, as well as the parties hereto;

That Defendant is, and has been, an actual and bonafide resident of the County of Clark, State of Nevada, and has been actually domiciled therein for more than six (6) weeks immediately preceding the commencement of this action; that all allegations contained in Defendant's First Amended Counter Claim for Divorce are

DISPOSITIONS

- ☐ - Converted from Blackstone
- ☐ - Involuntary Dismissal
- ☐ - Transferred
- ☐ - Voluntary Dismissal
- ☐ - Decision w/out Trial/Hearing
- ☐ - Decision w/ Trial/Hearing
- ☒ - Decision w/ Trial/Evidentiary Hearing

Guardianship

- ☐ - Death
- ☐ - Age of Majority
- ☐ - Restoration of Competency
- ☐ - Order Terminating Guardianship Final Acct.

RECEIVED

AUG 31 2011

FAMILY COURT
DEPARTMENT

1 true as therein alleged, except as denied by Plaintiff in his Answer to Counterclaim
2 for Divorce.

3 That Defendant is entitled to a *Decree of Divorce* from Plaintiff on the grounds
4 set forth in Defendant's Amended Counter claim for Divorce; that there are two (2)
5 minor children the issue of this marriage, to-wit: Weston Curtis Grieger, born
6 November 11, 2001 and Chevy Whalen Greiger, born August 11, 2004, that there
7 are no minor children adopted into this marriage, and that Defendant is not now
8 pregnant.

9 That the parties have agreed to all issues incident to this divorce action;

10 That the parties are incompatible in marriage and are entitled to a Decree of
11 Divorce on the grounds of incompatibility; and

12 That the parties have waived Findings of Fact, Conclusions of Law and Notice
13 of Entry of Decree of Divorce.

14 That Plaintiff is in Contempt for not complying with the Court's orders on
15 December 14, 2010 to obtain an psychological evaluation.

16 The Court advised Plaintiff's attorney, Chris Aaron, Esq., that Dr. Mark
17 Chambers does a good job on psychological evaluations and his address is: 8275 S.
18 Eastern Avenue, Suite 200, Las Vegas, NV 89123, phone number 702-614-4450.

19 Good cause appearing, therefor:

20 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that the parties are
21 granted a Decree of Divorce, forever dissolving the bonds of matrimony, and that the
22 parties are restored to the status of unmarried persons.

23 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that there are two
24 minor children the issue of this marriage, to-wit: Weston Curtis Grieger, born
25 November 11, 2001 and Chevy Whalen Greiger, born August 11, 2004;
26
27
28

1 **CHILD CUSTODY, VISITATION, AND SUPPORT**

2 **IT IS FURTHER ORDERED, ADJUDGED and DECREED** that the parties,
3 Jennifer Elise Gordon (hereinafter referred to as "Jennifer") and Matthew Robert
4 Geiger (hereinafter referred to as "Matthew") shall be awarded joint legal custody
5 custody of their minor children, Weston and Chevy with Jennifer having Primary
6 Physical Custody of the children.

7 **IT IS FURTHER ORDERED, ADJUDGED and DECREED** that Jennifer may
8 relocate to the State of California with the minor children.

9 **IT IS FURTHER ORDERED, ADJUDGED and DECREED** that Matthew shall
10 undergo a psychological evaluation and until such evaluation is completed, Matthew
11 shall have Supervised visitation with the children as follows:

12 A. While Jennifer is still living in Las Vegas, Matthew shall have
13 Supervised visitation with the children at Open Arms on Saturdays from 1:00 p.m. until
14 5:00 p.m. and on Sundays from 12:30 p.m. until 4:30 p.m. Parties shall split the costs
15 of the Open Arms fees.

16 B. After Jennifer moves to California and until the Court orders
17 unsupervised visits, Matthew shall have Supervised visitation with the children at Open
18 Arms one weekend a month for two (2) hours on Saturday and two (2) hours on
19 Sunday, preferably the second weekend of every month.

20 C. Upon Matthew completing the psychological evaluation, this matter
21 shall be re-noticed for a hearing so that the Court may review it and Matthew may
22 make an application to have unsupervised visits with the children. Plaintiff's counsel,
23 Mr. Aaron, may deliver th evaluation to Judge Nathan's chambers with a letter to be
24 lodged, not filed, and then there will be a hearing on the evaluation.

25 There shall be no unsupervised visitation without the Court reviewing Matthew's
26 psychological evaluation first and approving them.

1 When Matthew's psychological evaluation is successful, and the Court
2 approves the unsupervised visits the visitation shall be as follows:

3 1. Matthew shall have unsupervised visitation with the children two
4 (2) weekends a month, those being the second and fourth weekends, the parties will
5 meet in Barstow, California for the child exchange. The exchange shall be at
6 approximately 7:00 p.m. on the Friday, with a half hour window, unless the parties can
7 mutually agree on another time by text message. The return time shall be at 5:00 p.m.
8 on the Sunday.

9 The Court is giving father an offset for gas costs when parties start to
10 meet in Barstow, California. Counsel shall do the calculation as to that amount and is
11 to figure it into the Decree. *The Court finds that twenty dollars*
12 *is a fair amount for an offset for gas.*
13 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Matthew is now
14 under an Order To Show Cause for the psychological evaluation, which was ordered
15 back on December 14, 2010. If this matter comes before the Court for any reason and
16 the psychological evaluation has not been completed the Court will impose sanctions
17 on the contempt issued today.

18 **IT IF FURTHER, ORDERED, ADJUDGED AND DECREED** that the State of
19 Nevada, U.S.A. is the habitual residence of the children in accordance with N.R.S.
20 125A.290.

21 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that pursuant to
22 NRS 125A.350 the parties are put on notice that if custody has been established and
23 the custodial parent or a parent having joint custody intends to move their residence
24 to a place outside of this state and to take the child with them, they must, as soon as
25 possible and before th planned move, attempt to obtain the written consent of the
26 other parent to move the child from the state. If the noncustodial parent or other
27 parent having joint custody refuses to give that consent, the parent planning the
28 move shall, before they leave the state with the child, petition the Court for

1 permission to move the child. Failure to comply with the provisions of this section may
2 be considered as a factor if a change of custody is requested by the noncustodial
3 parent or other parent having joint custody.

4 **PENALTY FOR VIOLATION OF ORDER:** The abduction, concealment, or
5 detention of child in violation of this order is punishable as a category D felony as
6 provided in NRS 193.130. NRS 200.359 provides that every person having a limited
7 right to a child or any parent who willfully detains, conceals, or removes the child
8 from a parent, guardian, or other person having lawful custody or right of visitation of
9 a child in violation of an order of this Court, or removes the child from the jurisdiction
10 of the Court without the consent of either the Court or all persons who have the right
11 to custody or visitation is subject to being punished for a category D felony as
12 provided in NRS 193.130. NRS 125.510(6).

13 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Hague
14 Convention shall apply in certain circumstances outlined in NRS 125.510(7).

15 **CHILD SUPPORT**

16 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that because
17 Matthew is presently receiving unemployment benefits in the amount of \$1,600.00
18 per month, he shall pay child support in the amount of \$400.00 per month, for the
19 parties' minor children, effective June 1, 2011.

20 As soon as Matthew starts to work, he is to forward a copy of his paycheck to
21 Attorney Aaron, who will forward it to Attorney Veiga and the parties shall then
22 stipulate to Child Support in the amount of 25% of Matthew's current income.

23 The parents understand that pursuant to NRS 125B.145, either party may
24 request the Court to review the child support obligation every three (3) years or upon
25 a change in the circumstances of the payor parent and/or of the children.
26
27
28

1 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the children's
2 support obligation herein may be reviewed by the Court every three years in
3 accordance with NRS 125B.145.

4 **HEALTH CARE**

5 **ITS IS FURTHER ORDERED ADJUDGED AND DECREED** that Jennifer shall
6 provide medical and health insurance for the minor children, so long as Jennifer can
7 provide the same through her employer, until such time as each minor child reaches
8 the age of majority or marries or otherwise becomes emancipated before reaching
9 the age of majority. If the child is still attending school at the time he reaches the
10 age of majority, Jennifer shall continue providing medical insurance for the child, so
11 long as Jennifer can provide the same through her employer, until such time as each
12 reaches the age of eighteen (18) years old or graduates from high school, whichever
13 event occurs first.

14 The parties shall equally divide any unreimbursed and/or uncovered medical
15 expenses for the minor children, including, medical, dental, orthodontic, optical and
16 psychological expenses, pursuant to the 30/30 Rule. The parent incurring any
17 unreimbursed/uncovered medical expense shall have thirty (30) days from the date
18 they incur such an expense to request reimbursement from the other parent, and
19 provide a receipt or other proof of payment of such expense. The reimbursing
20 parent shall then have thirty (30) days to reimburse the parent incurring such
21 expense one-half (½) of such expense. Failure to request reimbursement for any
22 expense within thirty (30) days of incurring the same shall constitute a waiver of
23 reimbursement.

24 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that each party
25 shall submit the information required in NRS 125B.055, NRS 125.130 and NRS
26 125.230 on a separate form to the Court and the Welfare Division of the Department
27 of Human Resources within ten days from the date this Decree is filed. Such
28

1 information shall be maintained by the Clerk in a confidential manner and not part of
2 the public record. Each party shall update the information filed with the Court and
3 the Welfare Division of the Department of Human Resources within ten days should
4 any of that information become inaccurate.

5 **ALIMONY**

6 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that there shall
7 be no alimony paid from one party to the other and that this provision shall not be
8 modifiable in any way, any time for any reason.

9 **DISTRIBUTION OF COMMUNITY ASSETS AND DEBTS**

10 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Jennifer
11 shall receive as her sole and separate property, free from any claim of Matthew, the
12 following:

- 13 a. Any and all bank checking and savings or other financial institution
14 account held in Jennifer's name alone or jointly with another;
- 15 b. The 1989 Grand Marquis automobile, free and clear;
- 16 c. The 1990 Cadillac Seville automobile, free and clear;
- 17 d. One hundred percent of her pension;
- 18 e. Any and all furniture and furnishings in her possession and
- 19 f. All of Jennifer's jewelry, clothing and other personal belongings.

20 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Matthew shall
21 receive as his sole and separate property, free from any claim of Jennifer, the
22 following:

- 23 a. Any and all bank checking and savings or other financial institution
24 account held in Matthew's name alone or jointly with another;
 - 25 b. The 1989 Blazer automobile, free and clear;
 - 26 c. The 2005 Yamaha R1, free and clear;
 - 27 d. The 1989 Jimmy automobile, free and clear;
- 28

- 1 f. One hundred percent of his pension;
- 2 g. Any and all furniture and furnishings in his possession and
- 3 h. All of Matthew's jewelry, clothing and other personal belongings

4 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the debts of
5 the marriage shall be adjudicated as follows:

6 Jennifer shall assume, pay, defend indemnify and hold Matthew harmless
7 from the following debts and obligation, including, without limitation, the following:

8 a. Any and all debts, encumbrances or liabilities, which are solely in
9 Jennifer's name;

10 b. Any and all other debts and obligations which have been incurred by
11 Jennifer, alone, since the date of the parties' separation, to-wit: on or about
12 January 1, 2010.

13 c. Fifty percent (50%) of any and all debt associated with the foreclosure
14 on December 25, 2010 of the marital residence, including but not limited to the debt
15 with the mortgage company and fees incurred for the foreclosure.

16 Matthew shall assume, pay, defend indemnify and hold Jennifer harmless
17 from the following debts and obligation, including, without limitation, the following:

18 a. Any and all debts, encumbrances or liabilities, which are solely in
19 Matthew's name;

20 b. Any and all other debts and obligations which have been incurred by
21 Matthew, alone, since the date of the parties' separation, to-wit: on or about
22 January 1, 2010.

23 c. Fifty percent (50%) of any and all debt associated with the foreclosure
24 on December 25, 2010 of the marital residence, including but not limited to the debt
25 with the mortgage company and fees incurred for the foreclosure.

26 d. One hundred percent of any and all medical debt he incurred under his
27 name.
28

1 e. Matthew shall reimburse Jennifer \$499.89 for the debt with Monitronics
2 Alarm system, which monthly debit is still currently being deducted from Jennifer's
3 current bank account.

4 f. Matthew shall be responsible for fifty percent (50%) of the debt with
5 Mountain View Christian School, in the amount of \$3,207.32.

6 g. Matthew shall pay Jennifer \$1,200.00, on or before June 27, 2011,
7 which will cover any and all un-reimbursed medical arrears and child support arrears
8 which were covered in the schedule of arrears, through May 15, 2011. This
9 \$1,200.00 will also include a debt Matthew had with Jennifer, for Jennifer paying
10 Matthew's car insurance through her bank account and those payments were
11 automatically deducted from her account from January 2010 through July 2010.

12 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that based upon
13 the above, that the division of property as stated hereinabove is fair and equitable.

14 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that any and all
15 accounts, including, but not limited to, credit card and charge accounts, utility
16 accounts, loans, and accounts for household services held by the parties jointly shall
17 be canceled, if any, and each party shall be solely responsible for obtaining new
18 accounts in his or her respective individual name. Each party shall indemnify and
19 hold the other party harmless from any and all liability arising from any account held
20 in his or her sole and separate name, or for which he or she is solely responsible, but
21 for which may create a community obligation as a result of the community status of
22 the parties or a party failing to remove the other party from the account.

23 **NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED and**
24 **DECREED** that the bonds of matrimony now and heretofore existing between
25 Jennifer and Matthew, are hereby dissolved, set aside, and forever held for naught;
26 and the parties hereto, and each of them, are hereby restored to all the rights and
27 privileges of single, unmarried persons.
28

1 **ADDITIONAL TERMS AND CONDITIONS**

2 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the parties
3 shall file separately for tax year 2011. Each party shall indemnify and hold harmless
4 the other from any tax liabilities, penalties or interest on their separately filed federal
5 income tax returns may generate.

6 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Jennifer
7 shall receive the child dependency exemption for the children each and every year.

8 **IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that each party
9 shall bear their own attorney's fees, costs and expert fees in this matter

10 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that pursuant to
11 the stipulation of the parties, the Eighth Judicial District Court, Family Law Division
12 shall retain jurisdiction over all matters.

13 **SEPARATE AGREEMENTS**

14 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that this decree of
15 Divorce is the full and final agreement between the parties and cannot be modified
16 except by mutual agreement of the parties and in writing.

17 **INDEMNIFICATION**

18 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the parties
19 hereto covenant and agree not to contract any debts, charges, or liabilities
20 whatsoever for which the other party, or the other party's property or estate, shall or
21 may become liable or answerable. In the event that a party hereto is made to
22 answer for the other party's debt or obligation, the other party shall indemnity and
23 hold harmless that party from such debt or obligation.

24 In the event that a creditor makes a party to this Decree of divorce liable for a
25 debt or obligation assigned to the other party in this decree of Divorce, the other
26 party shall indemnify and hold that party harmless from liability.
27
28

1 **ENFORCEMENT OF THIS DECREE OF DIVORCE**

2 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that should
3 either party, not be in compliance with this Decree of Divorce and should the
4 aggrieved party bring the appropriate action before any court to enforce said Decree,
5 then the non-compliant party shall be responsible to the aggrieved party for all
6 attorney's fees, costs and interest thereon, from the date of notice of non-
7 compliance.

8 **CONTEMPT OF COURT**

9 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that should either
10 party, not be in compliance with this Decree of Divorce, such action shall be
11 considered a contempt of court, and the noncompliant party shall be subject to any
12 sanction, on order imposed by the court, including but not limited to imprisonment
13 and/or fine.

14 **EXECUTION OF DOCUMENTS**

15 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the parties
16 shall cooperate and execute any and all documentation to effectuate the division of
17 assets and debts as stated hereinabove and that the parties will use good faith in
18 executing all such documents.

19 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Jennifer and
20 Matthew each covenant and represent to the other that they have made a full and
21 fair disclosure of all community an/or separate debts/liabilities, whether owned by
22 Jennifer and Matthew and/or the community, and that the same have been included
23 in this Decree. In the event that any additional debt/liability, whether owned by
24 Jennifer, Matthew and/or the community, which would otherwise constitute jointly
25 owned or community obligation, is discovered after the date of this Decree, such
26 debt/liability shall be the equal obligation of the parties. If a dispute arises between
27
28

1 the parties relative to responsibility for any undisclosed debt/liability, this Court shall
2 retain jurisdiction to adjudicate and resolve the dispute.

3 **DEFENDANT'S NAME**

4 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Jennifer shall
5 maintain her maiden name of "Gordon."

6 **NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND**
7 **DECREED** that the bonds of matrimony now and heretofore existing between
8 Plaintiff, Matthew Robert Geiger and Defendant, Jennifer Gordon, are hereby
9 dissolved, set aside, and forever held for naught; and the parties hereto, and each of
10 them, are hereby restored to all the rights and privileges of single, unmarried
11 persons.

12 DATED this 27th day of August, 2011.


13 IT IS SO ORDERED September

14 
15 **DISTRICT COURT JUDGE** *ct*

16 **GAYLE NATHAN**

17 Respectfully submitted by:

18 **VEIGA LAW OFFICES, P.C.**

19 
20 **SORAYA M. VEIGA, ESQ.**
21 Nevada Bar No. 007944
22 7464 W. Sahara Avenue
23 Las Vegas, Nevada 89117
24 (702) 991-7203
25 Attorney for Defendant,
26 Jennifer Gordon
27
28



CLERK OF THE COURT

VEIGA LAW OFFICES, P.C.
Soraya M. Veiga, Esq.
Nevada State Bar No. 007944
7464 W. Sahara Avenue
Las Vegas, Nevada 89117
(702) 991-7203
email: veigalawoffice@cox.net
Attorney for Defendant, Jennifer Elise Gordon

DISTRICT COURT
FAMILY COURT
CLARK COUNTY, NEVADA

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

CASE NO. D-010-430639
DEPT. NO. T


NOTICE OF ENTRY OF DECREE OF DIVORCE

PLEASE TAKE NOTICE that a Decree of Divorce was entered in the
above-entitled matter on the 27TH day of September, 2011, a copy of which is
attached hereto.

DATED: October 4th, 2011.

VEIGA LAW OFFICES, P.C.

By:



SORAYA M. VEIGA, ESQ.
Nevada Bar No. 007944
7464 W. Sahara Avenue
Las Vegas, Nevada 89117
Attorney for Defendant
Jennifer Elise Gordon

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CERTIFICATE OF EMAIL

I hereby certify that I am an employee of VEIGA LAW OFFICES, P.C. and
that on the 4th day of October 2011. I emailed a true and correct copy of
NOTICE OF ENTRY OF DECREE OF DIVORCE to:

Matthew Robert Geiger
8669 Horizon Wind Avenue Apt. 103
Las Vegas, Nevada 89178

Jennifer Elise Gordon
4047 Meadow Foxtail Drive
Las Vegas, Nevada 89122


An Employee of VEIGA LAW OFFICES, P.C.



CLERK OF THE COURT

VEIGA LAW OFFICES, P.C.
Soraya M. Veiga, Esq.
Nevada State Bar No. 007944
7464 W. Sahara Avenue
Las Vegas, Nevada 89117
(702) 991-7203
email: veigalawoffice@cox.net
Attorney for Defendant, Jennifer Elise Gordon

DISTRICT COURT
FAMILY COURT
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,)	CASE NO. D-010-430639
Plaintiff,)	DEPT. NO. T
v.)	
JENNIFER ELISE GORDON,)	
Defendant.)	


NOTICE OF WITHDRAWAL OF ATTORNEY

NOTICE IS HEREBY GIVEN pursuant to Supreme Court Rule 46 that Soraya M. Veiga, Esq., of the Veiga Law Offices, P.C., does hereby withdraw as attorney for Defendant, JENNIFER ELISE GORDON in the above-entitled matter as a final determination has been rendered. Jennifer's last known address is:

4047 Meadow Foxtail Drive
Las Vegas, Nevada 89122

DATED this 4th day of October, 2011.

VEIGA LAW OFFICES, P.C.



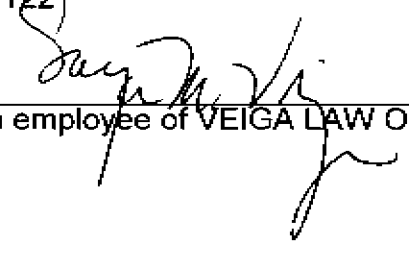
SORAYA M. VEIGA, ESQ.
Nevada Bar No. 007944
7464 W. Sahara Avenue
Las Vegas, Nevada 89117
(702) 991-7203
Attorney for Defendant

1
2
3 **CERTIFICATE OF MAILING & EMAIL**

4 I hereby certify that I am an employee of Veiga Law Offices, P.C. and that on
5 the 4th day of October, 2011, I deposited for mailing, postage prepaid thereon, at
6 Las Vegas, Nevada, a true and accurate copy of the attached **NOTICE OF**
7 **WITHDRAWAL OF ATTORNEY**, addressed to the following:

8
9 Matthew Robert Geiger
10 8669 Horizon Wind Avenue Apt. 103
11 Las Vegas, Nevada 89178

12 Jennifer Elise Gordon
13 4047 Meadow Foxtail Drive
14 Las Vegas, Nevada 89122

15 
16 An employee of VEIGA LAW OFFICES, P.C.
17
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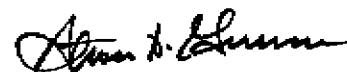
(Your name) Matthew Robert Geiger

(Address) 8659 Horizon Wind Ave #102

Las Vegas, NV 89178

(Telephone) _____

In Proper Person



CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

Matthew Robert Geiger)
Plaintiff,)

vs.)

Jennifer Elise Gordon)
Defendant)

Case No.: D-10-430639

Dept. No.: T

MOTION FOR AN EMERGENCY HEARING TO ENFORCE CHILD CUSTODY AND/OR VISITATION ORDER ON AN ORDER SHORTENING TIME

NOTICE OF MOTION

TO: Name of Opposing Party Jennifer Elise Gordon; and

TO: Name of attorney for Opposing Party, if one N/A

PLEASE TAKE NOTICE that a hearing regarding enforcement of the current custody/visitation order in this case will be held before the Eighth Judicial District Court - Family Division at 601 N. Pecos Road, Las Vegas 89101, on the _____ day of _____

at (ti: 5/7/2013 m. in Department T
10:00 AM

4-4-13 Matthew Robert Geiger
(date)


(signature)

NOTICE: YOU ARE ADVISED THAT FAILURE TO FILE AND SERVE A WRITTEN OPPOSITION WITHIN 10 DAYS AFTER SERVICE MAY BE UNDERSTOOD AS AN ADMISSION THAT THIS MOTION IS VALID.

MOTION

☒ Plaintiff/ ☐ Defendant states the following facts under penalty of perjury:

1. I, Matthew Robert Geiger, am the ☒ Plaintiff/ ☐ Defendant in the above-entitled action.

2. There is/are 2 child(ren) to which there exists a current custody order as follows:

(a) Names of the children:

Full Name	Date of Birth	Residence Address
1. Weston Curtis Geiger	11/11/2001	91 Autumn Day St Henderson, NV 89074
2. Chevy Whalyn Geiger	08/11/2004	91 Autumn Day St Henderson, NV 89074
3. N/A		
4. N/A		
5. N/A		

(b) Who was awarded **physical** custody (primary custody or joint custody)?

☐ Plaintiff ☒ Defendant ☐ Other, please specify:

3. Pursuant to the Order, filed on 09/27/2011, by Judge Gayle Nathan, Department T, (state custody and visitation arrangement):

Jennifer Elise Gordon (hereinafter referred to as "Jennifer") and Matthew Robert Geiger (hereinafter referred to as "Matthew") shall be awarded joint legal custody of their minor children. Weston and Chevy with Jennifer having Primary Physical Custody of the children. Matthew will have supervised visitation till Matthew under goes a psychological evaluation. Matthew's visitation will be at Open Arms, one weekend a month for (2) two hours on Saturdays and (2) two hours on Sunday, preferably the second weekend of every month. After the court reviews Matthew's psychological evaluation and approves Matthew's psychological evaluation is successful, and the court approves the unsupervised visits the visitation shall be as follows: Matthew shall have unsupervised visitation with the children two (2) weekends a month, those being the second and fourth weekends.

4. Are there any other orders that exist? ☐ Yes ☒ No. If so, please state the following:

City, State	Case Number	Name of Court	Date of Last Order
a. N/A			
b. N/A			

5. Has CHILD PROTECTIVE SERVICES (CPS) ever been contacted regarding the children at issue in this action? ☐ Yes ☒ No.

Is CPS currently involved with this family ☐ Yes ☒ No. If yes to the question, give details, including the caseworker's name: N/A

6. Have you contacted law enforcement to assist you in enforcing the order? ☐ Yes ☒ No
If so, please provide the name of the responding law enforcement authority and the responding officer's name: N/A

7. In the following space, state the facts to support your request for an emergency hearing to enforce a child custody/visitation order. Include the approximate dates of attempted enforcement or violation of the order. Attach a copy of any police report(s) available.
Since our court date on 05/27/2011, Jennifer has not let me (Matthew) see our children
at Open arms and/or with my parents. Jennifer will not give me any kind of information
on our children schools or doctors. It has recently been brought me that my son has

1 medical problems and Jennifer will not give me any information. On a phone call with my
2 son he told me (Matthew), at which time Jennifer or her boyfriend took the and hung it up.
3 Everytime I talk to my children on the phone Jennifer or her boyfriend are listening in on
4 calls. Jennifer has also refused my parents from seeing our children. I (Matthew) has
5 completed my psychological evaluation on 11/2012.
6 _____
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____

17 8. I hereby request an Emergency Hearing Date on an Order Shortening Time.

18 9. My address and telephone numbers where I can be reached are:

19 8659 Horizon Wind Ave 102 Las Vegas, NV 89178
20 _____

21 POINTS AND AUTHORITIES

22 NRS 125.480 states,

23 **Best interest of child; preferences; considerations of court; presumption when court**
24 **determines that parent or person residing with child is perpetrator of domestic violence.**

25 1. In determining custody of a minor child in an action brought under this chapter, the
26 sole consideration of the court is the best interest of the child. If it appears to the court that joint
27 custody would be in the best interest of the child, the court may grant custody to the parties jointly.

27 © Clark County Family Law Self-Help Center

28 May 29, 2002

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Mot_Emerg_Hear/mot.wpd (#104)

Use only most current version.

Please call the Self Help Center to confirm most current version.

1 2. Preference must not be given to either parent for the sole reason that the parent is the
2 mother or the father of the child.

3 3. The court shall award custody in the following order of preference unless in a
4 particular case the best interest of the child requires otherwise:

5 (a) To both parents jointly pursuant to NRS 125.490 or to either parent. If the court does not
6 enter an order awarding joint custody of a child after either parent has applied for joint custody, the
7 court shall state in its decision the reason for its denial of the parent's application. When awarding
8 custody to either parent, the court shall consider, among other factors, which parent is more likely to
9 allow the child to have frequent associations and a continuing relationship with the noncustodial
10 parent.

11 (b) To a person or persons in whose home the child has been living and where the child has
12 had a wholesome and stable environment.

13 (c) To any person related within the third degree of consanguinity to the child whom the court
14 finds suitable and able to provide proper care and guidance for the child, regardless of whether the
15 relative resides within this state.

16 (d) To any other person or persons whom the court finds suitable and able to provide proper
17 care and guidance for the child.

18 4. In determining the best interest of the child, the court shall consider, among other
19 things:

20 (a) The wishes of the child if the child is of sufficient age and capacity to form an intelligent
21 preference as to his custody;

22 (b) Any nomination by a parent of a guardian for the child; and

23 (c) Whether either parent or any other person seeking custody has engaged in an act of
24 domestic violence against the child, a parent of the child or any other person residing with the child.

25 5. Except as otherwise provided in subsection 6 or NRS 125C.210, a determination by
26 the court after an evidentiary hearing and finding by clear and convincing evidence that either parent
27 or any other person seeking custody has engaged in one or more acts of domestic violence against the
28 child, a parent of the child or any other person residing with the child creates a rebuttable
presumption that sole or joint custody of the child by the perpetrator of the domestic violence is not
in the best interest of the child. Upon making such a determination, the court shall set forth:

(a) Findings of fact that support the determination that one or more acts of domestic violence
occurred; and

(b) Findings that the custody or visitation arrangement ordered by the court adequately
protects the child and the parent or other victim of domestic violence who resided with the child.

6. If after an evidentiary hearing held pursuant to subsection 5 the court determines that
each party has engaged in acts of domestic violence, it shall, if possible, then determine which
person was the primary physical aggressor. In determining which party was the primary physical
aggressor for the purposes of this section, the court shall consider:

- 1 (a) All prior acts of domestic violence involving either party;
- 2 (b) The relative severity of the injuries, if any, inflicted upon the persons involved in those
- 3 prior acts of domestic violence;
- 4 (c) The likelihood of future injury;
- 5 (d) Whether, during the prior acts, one of the parties acted in self-defense; and
- 6 (e) Any other factors which the court deems relevant to the determination.
- 7 In such a case, if it is not possible for the court to determine which party is the primary physical
- 8 aggressor, the presumption created pursuant to subsection 5 applies to both parties. If it is possible
- 9 for the court to determine which party is the primary physical aggressor, the presumption created
- 10 pursuant to subsection 5 applies only to the party determined by the court to be the primary physical
- 11 aggressor.
- 12 7. As used in this section, "domestic violence" means the commission of any act
- 13 described in NRS 33.018.
- 14 NRS 22.010 states,
- 15 **Acts or omissions constituting contempts.** The following acts or omissions shall be deemed
- 16 contempts:
- 17 1. Disorderly, contemptuous or insolent behavior toward the judge while he is holding
- 18 court, or engaged in his judicial duties at chambers, or toward masters or arbitrators while sitting on
- 19 a reference or arbitration, or other judicial proceeding.
- 20 2. A breach of the peace, boisterous conduct or violent disturbance in the presence of the
- 21 court, or in its immediate vicinity, tending to interrupt the due course of the trial or other judicial
- 22 proceeding.
- 23 3. Disobedience or resistance to any lawful writ, order, rule or process issued by the
- 24 court or judge at chambers.
- 25 4. Disobedience of a subpoena duly served, or refusing to be sworn or answer as a
- 26 witness.
- 27 5. Rescuing any person or property in the custody of an officer by virtue of an order or
- 28 process of such court or judge at chambers.
- 29 6. Disobedience of the order or direction of the court made pending the trial of an action,
- 30 in speaking to or in the presence of a juror concerning an action in which the juror has been
- 31 impaneled to determine, or in any manner approaching or interfering with such juror with the intent
- 32 to influence his verdict.

33 ///

34 ///

1 7. Abusing the process or proceedings of the court or falsely pretending to act under the
2 authority of an order or process of the court.

3 **I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAW OF THE STATE OF**
4 **NEVADA THAT I HAVE READ THE STATEMENTS CONTAINED IN THIS MOTION,**
5 **KNOW THE CONTENT THEREOF, AND BELIEVE THEM TO BE TRUE AND**
6 **CORRECT**

7 DATED 4-4-13

8 
9 Signature of ☒ Plaintiff ☐ Defendant
10 Printed name: Matthew Robert Geiger

11 SUBSCRIBED and SWORN before me
12 this 4 day of April, 2002 2013



13 
14 NOTARY PUBLIC

15 ///

16 ///

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28 © Clark County Family Law Self-Help Center
May 29, 2002
ALL RIGHTS RESERVED

**Greg Harder, Psy.D.
Licensed Psychologist #PY0338
4955 South Durango Dr. Suite 214
Las Vegas, NV 89113**

Phone: (702) 685-5297

Fax: (702) 685-5314

November 2, 2012

RE: Matthew Geiger

Reason For Referral:

I evaluated Mr. Geiger at his own request to determine if he has any mental health problems. He informed me that he and his ex-wife are involved in a custody dispute, and she is alleging that he has psychological problems. Before evaluating Mr. Geiger, I informed him that I do not conduct child custody evaluations, and I cannot make recommendations to the court about having custody of his children, however, I can make an opinion as to whether he has any significant mental health issues.

History:

Mr. Geiger denied having any significant mental health issues. He stated his wife is claiming that he does so she can obtain custody of their children. He stated that she claims he is "crazy" and that he is trying to kill himself. He stated that she called the police on him a couple of times and alleged that he was suicidal when he was not. He stated that she claimed he was going to shoot himself, but he denied this was true.

He stated they took him to Monte Vista and placed him on a 72 hour hold, and then released him. He admitted to being on antidepressant medication in the past for a brief period of time due to his marital problems. He denied current symptoms of depression. He denied having trouble sleeping. He denied having problems concentrating. He denied problems with his energy level or appetite. He denied any present suicidal thoughts. He also denied any history of psychotic symptoms, such as hearing voices or having delusional thoughts. He denied problems with anxiety or panic attacks.

He and his wife were together for 12 years and married for 5 years. He filed for divorce. They have been divorced for one and a half years. They have two children, ages 11 and 8. He would

like equal time with his children. Since they have been divorced, he stated that she filed a restraining order on him for bogus reasons, and that her boyfriend threatened to kill him.

During their relationship, Mr. Geiger stated she called the cops on him three times. He stated one time she hit him and he grabbed her arm to stop him, and she had him arrested for domestic violence. The charge was reduced to disturbing the peace and he had to complete 6 months of anger management classes. He stated she called the cops one more time and alleged that he was trying to kill himself again, but this time, they cops did not take him anywhere because they did not believe her. Prior to their marriage, he admitted to being arrested for possession of marijuana, when he was either a juvenile or a young adult. He also admitted to being arrested for trespassing as a juvenile and twice for having marijuana. He was given probation as an adult for the marijuana charge, and completed his probation successfully.

He denied using drugs in three years. He admitted that he used to smoke marijuana daily prior to that time. He denied using other drugs, and denied drinking alcohol. He stated he had a medical marijuana card in 2006 for chronic pain.

He is a high school graduate. He denied any history of learning disorders. He denied ever being in special education classes. He denied having any behavior problems in school other than he got in one fight in junior high. He also was expelled later in school due to having too many absences and went to a new school.

He has been working as an Iron Worker since he was 17 years old. He is currently 33 years old. He denied having any trouble maintaining employment.

Psychological Testing:

Mr. Geiger completed the Personality Assessment Inventory (PAI). This is a 344 item multiple choice personality test that measures a wide variety of psychological disorders. Mr. Geiger's responses to the validity questions of the test indicated that the test has valid results. The Positive Impression Index indicated he was slightly defensive, but did not answer the questions in a clinically significant manner that would suggest he was deliberately lying or not admitting to common faults. The Negative Impression Index was also not significant, indicating that he did not try to make himself look worse than he really is either. The test results were not significant for any mental health disorder. None of the clinical scales or subscales were elevated except for the scale measuring poor treatment success, which is commonly elevated in subjects who do not think they have a problem.

Conclusion:

The interview with Mr. Geiger reveals a history of depression related to his marriage. He admitted to being arrested as an adult for domestic violence and possession of marijuana, and

as a minor for possession of marijuana and trespassing. He completed probation in the past for his substance abuse charges, and also completed anger management counseling. He denied having a substance abuse problem currently, and has not used marijuana in three years. He also does not drink alcohol excessively, and denied using other drugs. He denied being violent toward his ex-wife, but stated she called the police on him in the past for false allegations of domestic violence. He stated his wife is alleging that he is "crazy" and has made suicidal threats in the past. She had him hospitalized against his will for allegedly threatening to shoot himself, which he denied. Mr. Geiger essentially denied having any problems with depression in the last couple of years. He denied ever being suicidal. He denied having a problem with his temper. He denied any other mental health issues, including violent behavior, psychosis, paranoia, anxiety problems, or other disorders. The PAI was administered to provide information about his mental health problems, as well as to evaluate his honesty during the interview. The test results indicated he was slightly defensive, but not overly so, and the test results were judged to be valid. There was no evidence from the PAI that he currently has problems with depression, problems with aggressive behavior, substance abuse, high suicide risk, high stress, or any other disorder, including personality disorders.

Conclusion:

As an objective examiner, one can never be sure if a client is being completely honest or deliberately withholding information, in order to portray themselves in a positive way. The test results and interview, however, do not support any mental health problems from Mr. Geiger's point of view, and the validity scales do not indicate that he was deliberately distorting the truth in order to portray himself as having no problems. His history is of concern due to having had numerous police contacts and several arrests, including for substance possession, domestic violence, and alleged suicidal threats. He has maintained job stability, and his mental status was not indicative of any pathology.

Recommendations:

At present time there is no evidence of a current mental health disorder. However, due to his past history, I could only recommend that the courts use caution and perhaps obtain information from third party data sources, which were not available to this examiner, to assist them in making decisions about custody. Such data might include police reports, psychiatric records from Monte Vista Hospital, drug testing, and other third party statements, such as friends, family, and co-workers.


Sincerely,

Greg Harder, Psy.D.
Licensed Psychologist

Anthem UM Services, Inc.

1 of 2 29567

*****AUTO**SCH E-DIGIT 898
7529 1 AT 0-384
CHEVY GEIGER
8659 HORIZON WIND AVE UNIT 102
LAS VEGAS NV 89178-8733

Reference No: 0228710812
Provider: KELLY SCHMIDT
Facility/Vendor: SUNRISE HOSPITAL AND MEDICAL CENTER LLC
Client: ANTHEM BLUE CROSS LIFE AND HEALTH
Patient: CHEVY GEIGER
Subscriber: MATTHEW GEIGER
Admit Date: 17-Jun-2013
Date Created: 25-Mar-2013

Start Date	End Date	Days	Level of Care
17-Jun-2013	20-Jun-2013	3	LOC as billed

Quantity	Code	Description
1 Unit(s)	61343	incise skull (press relief)

Place of Service: Inpatient Hospital

Anthem UM Services, Inc. provides utilization management services for Anthem Blue Cross and Anthem Blue Cross Life and Health Insurance Company.

Pursuant to your contract, the above healthcare provider has notified us of the service(s) listed above. This letter confirms that you have given medical management the proper notification required by your contract and that the facility you have chosen is in network, however the provider, listed above, is not in network. Your services, provided by the non-participating provider, could result in significant out-of-pocket expense. If you would like information on available participating providers for your care or would like information on your out-of-pocket expense, please call Customer Service at the toll free number on your identification card.

This notification is valid for ninety (90) days from the service date listed above. If the service date changes, please contact us at the toll free number listed below.

If your diagnosis changes or if a different or additional service is planned, your contract requires that you notify us again. Also, if the date or location of the intended service or your choice of provider changes, you must, once again, notify us pursuant to your contract.

The letter is a confirmation that you have fulfilled your notification requirements for the above services pursuant to your contract. **THIS LETTER DOES NOT GUARANTEE CLAIMS PAYMENT.** No benefit determination has been made at this time. Payments are based on the terms of your coverage. This certification shall not be construed to expand or alter the benefits available under your benefit plan. This certification does not apply to any services where the cost of services exceeds the plan contract or policy lifetime maximums. Services that exceed the plan contract or policy maximums are non-covered services and may become your responsibility. This certification does not apply to any services where the information submitted with your claim differs from the information provided with your request for authorization of services.

Anthem Blue Cross is the trade name of Blue Cross of California. Anthem Blue Cross and Anthem Blue Cross Life and Health Insurance Company are independent licensees of the Blue Cross Association. © ANTHEM is a registered trademark of Anthem Insurance Companies, Inc. The Blue Cross name and symbol are registered marks of the Blue Cross Association.

Anthem UM Services, Inc. is a separate company providing utilization review services on behalf of Anthem Blue Cross.

If you have any questions about the terms of your coverage, please take some time now to review your contract or policy. You may also contact your Customer Service Representative at the toll-free number on your membership identification card for detailed information concerning your plan benefit maximums. In addition, your provider should check the Anthem Blue Cross Provider Access Website at www.anthem.com/ca for detailed information concerning your plan benefit maximums.

If you have any questions about this letter, please call (800) 274-7767.

Sincerely,
IAN HARVEY ANSAY
Medical Care Management

cc: SUNRISE HOSPITAL AND MEDICAL CENTER LLC
CHEVY GEIGER
KELLY SCHMIDT

1 MOFI

2 (Your Name)

Matthew Robert Geiger

3 (Your Address)

8659 Horizon Wind Ave #102
Las Vegas, NV 89178

4 (Email Address)

5 (Telephone Number)

6 In Proper Person

7 **DISTRICT COURT**
8 **CLARK COUNTY, NEVADA**

9
10 Matthew Robert Geiger

11 Plaintiff

12 vs.

13 Jennifer Elise Gordon

14 Defendant

CASE NO.: D-10-430639

DEPT NO.: T

15 **FAMILY COURT MOTION/OPPOSITION FEE INFORMATION SHEET (NRS 19.0312)**

16 Check the Statement that Describes the Motion or Opposition you are Filing:

17 ☒ I am filing one of the three following types of excluded Motion/Opposition and am not
18 subject to the \$25.00 filing fee:

19 1.A Motion for/Opposition to temporary relief;

20 2.A Motion for/Opposition to the modification of child support *only*; or

21 3.A Motion for/Opposition to reconsideration or a new trial, which is being filed
22 within ten (10) days after the final decree or judgment, was issued.

23 ☐ I am not filing an excluded Motion/Opposition (listed above) and am subject to the \$25.00
24 filing fee.

25 DATED this

9

day of

April

, 20 13

26 Angela Welton
27 (Print Your Name)

28 (☒ Check one) ☐ Plaintiff/ ☐ Defendant

(Signature)



CLERK OF THE COURT

1 SORAYA M. VEIGA, ESQ.
2 Nevada Bar No. 7944
3 2595 South Torrey Pines Drive
4 Las Vegas, Nevada 89146
Telephone (702) 686-3371
veigalawoffice@cox.net
Unbundled Attorney for Defendant, Jennifer Elise Gordon

5 DISTRICT COURT
6 FAMILY DIVISION
7 CLARK COUNTY, NEVADA

8 MATTHEW ROBERT GEIGER
9 Plaintiff,
10 vs.
11 JENNIFER ELISE GORDON,
12 Defendant,

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

13 **DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR AN EMERGENCY**
14 **HEARING TO ENFORCE CHILD CUSTODY AND/OR VISITATION ORDER ON AN**
15 **ORDER SHORTENING TIME**
16 **AND**
17 **DEFENDANT'S COUNTERMOTION FOR SUPERVISED VISITATION, FOR A**
18 **MODIFICATION OF CHILD SUPPORT AND TO REDUCE TO JUDGEMENT**
19 **PLAINTIFF'S CHILD SUPPORT ARREARS**

20 COMES NOW, Defendant, Jennifer Elise Gordon, by and through her
21 unbundled attorney, Soraya M. Veiga, Esq., and hereby submits her Opposition to
22 Defendant's Motion for an Emergency Hearing to Enforce Child Custody and/or
23 Visitation Order on an Order Shortening Time and Defendant's Counter Motion for
24 Supervised Visitation, For a Modification of Child Support and to Reduce To
25 Judgement Plaintiff's Child Support Arrears. This opposition and counter motion is
26 made and based upon the Points and Authorities as well as the pleadings and
27 documents on file herein and Defendant's Affidavit attached hereto as Exhibit "A"

28 ///

///

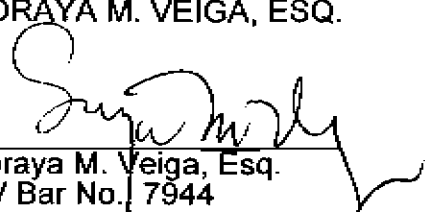
///

///

1 and oral argument to be adduced at the hearing of this matter.

2 DATED this 17th day of April, 2013.

3 SORAYA M. VEIGA, ESQ.

4 
5 Soraya M. Veiga, Esq.
6 NV Bar No. 7944
7 2595 South Torrey Pines Dr.
8 Las Vegas, NV 89146
9 (702) 686-3371
Unbundled Attorney for Defendant
Jennifer E. Gordon

10 **MEMORANDUM OF POINTS AND AUTHORITIES**

11 **I.**
"STATEMENT OF FACTS"

12 Defendant, Jennifer E. Gordon, (hereinafter "Jennifer") responds to Plaintiff's
13 allegations in his Motion For An Emergency Hearing To Enforce Child Custody
14 and/or Visitation Order on an Order Shortening Time as follows:

15 An evidentiary hearing was set for May 27, 2011, prior to the commencement
16 of the hearing, the parties reached an agreement and a proof of hearing was held
17 on May 27, 2011, Plaintiff, Matthew Robert Geiger (hereinafter "Plaintiff") was present
18 with his attorney Chris A. Aaron, Esq. from the Law Office of Joseph A. Scalia and
19 Jennifer was present with her attorney Soraya M. Veiga, Esq.

20 The Decree in relevant parts states the following:

- 21 1. That the parties were awarded joint physical custody of the children,
22 Weston and Chevy.
23 2. That Jennifer may relocate to the State of California with the minor
24 children.
25 3. While Jennifer is still living in Las Vegas, Plaintiff shall have Supervised
26 visitation with the children at Open Arms on Saturdays from 1:00 p.m.
27
28

1 until 5:00 p.m. and on sundays form 12:30 p.m. until 4:30 p.m.. Parties
2 shall split the costs of the Open Arms fees.

- 3 4. After Jennifer moves to California and until the Court orders
4 unsupervised visits, Plaintiff shall have Supervised visitation with the
5 children at Open Arms one weekend a month for tow (2) hours on
6 Saturday and tow (2) hours on Sunday, preferably the second weekend
7 of every month.

- 8 5. Upon Plaintiff completing the psychological evaluation this matter shall
9 be re-noticed for a hearing so that the Court may review it and Plaintiff
10 may make an application to have unsupervised visits with the children.
11 Plaintiff's counsel, Mr. Aaron, may deliver the evaluation to Judge
12 Nathan's chambers with a letter to be lodged, not filed, and then there
13 will be a hearing on the evaluation.

14 There shall be no unsupervised visitation without the Court reviewing
15 Plaintiff's psychological evaluation first and approving them.

- 16 6. When Plaintiff's psychological evaluation is successful, and the Court
17 approves the unsupervised visits the visitation shall be as follows:

18 A. Matthew shall have unsupervised visitation with the children
19 two (2) weekends a month, those being the second and fourth
20 weekends, the parties will meet in Barstow, California for the
21 child exchange. The exchange shall be at approximately 7:00
22 p.m. on the Friday, with a half hour window, unless the parties
23 can mutually agree on another time by text message. The return
24 time shall be at 5:00p.mj. On the Sunday.

- 25 6. That Plaintiff is now under an Order to Show Cause for the
26 psychological evaluation ,which was ordered back on December 14,
27 2010. If this matter comes before the Court for any reason and the
28

1 psychological evaluation has not been completed the Court will impose
2 sanctions on the contempt issued today.

3 7. That because Plaintiff is presently receiving unemployment benefits in
4 the amount of \$1,600.00 per month, he shall pay child support in the
5 amount of \$400.00 per month, for the parties' minor children, effective
6 June 1, 2011.

7 8. As soon as Plaintiff starts to work ,he is to forward a copy of his
8 paycheck to Attorney Aaron, who will forward it to Attorney Veiga and
9 the parties shall then Stipulate to child Support in the amount of 25% of
10 Plaintiff's current income.

11 Attached as **Exhibit "B"** is a copy of the Decree of Divorce.

12 Plaintiff is lying to the Court when he states in his Motion that "Jennifer has
13 not let me (Matthew) see our children at Open arms and/or with my parents."
14 Jennifer enrolled at Open Arms on June 11, 2011, as the Court ordered her to do.
15 Attached hereto as **Exhibit "C"** is a copy of the receipt of the payment she made for
16 the Orientation. In the contrary, Plaintiff never enrolled. On July 30, 2011, Shawnda
17 Thames, MBA, chief Executive Officer of Open Arms, sent a letter to Judge Nathan
18 informing the Judge that Jennifer had completed her Orientation but that the Plaintiff
19 had yet not contacted them. Attached hereto as **Exhibit "D"** is a copy of the letter
20 sent to Judge Nathan. Jennifer never moved to California, she continued living in
21 Nevada. Plaintiff never enrolled in Open Arms, therefore, he chose not to exercise
22 the court ordered supervised visitation at Open Arms each week with his children.
23 Plaintiff's parents do not have any court ordered visitation scheduled, so Jennifer is
24 not obligated to send the children to the grandparents house for visitation. Jennifer
25 would send the children to visit their grandparents if she would know for sure that
26 Plaintiff would not be there visiting too. Nevertheless, Jennifer informs the
27 grandparents of the children's activities and the dates they play baseball, last year
28

1 the grandparents attended all of the children's baseball games, even Plaintiff's sister
2 attended some of the games. Also, the grandparents come to Jennifer's house every
3 holiday and they visit with the children and bring their grandsons presents.

4 Plaintiff never calls the children. The parties youngest child, Chevy calls his
5 father frequently but the majority of the time Plaintiff does not answer the phone, the
6 majority of the times Chevy ends up talking to Plaintiff's wife. The parties eldest
7 child, Westin stopped calling Plaintiff a year ago, because his father never answered
8 the phone and because every time he made a promise to the child he broke the
9 promise.

10 Jennifer informs Plaintiff of the children's medical care via text messages.
11 He is aware that Chevy is having decompression surgery of the brain on July 1,
12 2013. He will be admitted at Sunrise Children's Hospital for an estimated five (5)
13 days.

14 Plaintiff was ordered to contact his attorney an notify him when he started
15 working so a Stipulation and Order would be filed increasing Plaintiff's child support
16 obligation to 25% of his monthly gross income. Plaintiff never contacted his attorney
17 or Jennifer. Plaintiff worked the majority of 2012 and was working until last week
18 when he was laid off. Attached hereto as **Exhibit "E"** are copies of the work orders
19 for 2012 that Jennifer was able to obtain from the Union. Jennifer is requesting that
20 Plaintiff be ordered to provide proof of his income from June 2011 until the present
21 and that child support be modified to 25% of the monthly income he has been
22 earning. Attached hereto as **Exhibit "F"** is a copy of the NCP Financial Transaction
23 history from the District Attorney's office that shows that they have been doing
24 income withholding since January 18, 2012 and that Plaintiff is child support arrears
25 total \$4,386.32.

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II.
ARGUMENT

A. Plaintiff's request for unsupervised visitations

Plaintiff is lying to this Court when he states in his motion that "Jennifer has not let me (Matthew) see our children at Open arms and/or with my parents. The Decree specifically stated that while Jennifer was still living in Las Vegas and until Plaintiff received his psychological evaluation and submitted it to the Court and requested unsupervised visits, Plaintiff was to have supervised visits in Open Arms every Saturday from 1:00 p.m. until 5:00 p.m. and on Sundays from 12:30 p.m. until 4:30 p.m. **Exhibit "D"** clearly proves that Plaintiff never chose to exercise his supervised visits at Open Arms. Jennifer enrolled and attended Mediation at Open Arms and has proven this with **Exhibit "C"**. Plaintiff by his own choice has spent almost two years without seeing his sons.

There are no court orders that require Jennifer to take the children to Plaintiff's parents so he can visit with them. Jennifer would send the children to visit their grandparents if she would know for sure that Plaintiff would not be there visiting too. Nevertheless, Jennifer informs the grandparents of the children's activities and the dates they play baseball, last year the grandparents attended all of the children's baseball games, even Plaintiff's sister attended some of the games. Also, the grandparents come to Jennifer's house every holiday and they visit with the children and bring their grandsons presents.

Plaintiff was ordered to have a psychological evaluation in December 14, 2010, it has took him two (2) years to do this. Jennifer is not a psychologist as in unable to refute the psychologist report submitted by Plaintiff. But even the psychologist himself states in the report "As an objective examiner, one can never be sure if a client is being completely honest or deliberately withholding information, in order to portray themselves in a positive way" Dr. Harder also says that Plaintiff's "history is of concern due to having had numerous police contacts and several

1 arrests, including for substance possession, domestic violence, and alleged suicidal
2 threats. Here are some of the lies that Plaintiff told the psychologist. First, Plaintiff
3 failed to tell the psychologist that his last arrest was for distributing narcotics, in a
4 plea bargain Plaintiff pleaded guilty to possession but the arrest was for distributing.
5 Second, it is not true that Plaintiff's probation has been successfully completed as
6 the psychologist reports, Plaintiff's probation was for five (5) years and does not end
7 until November of 2015. Third, as part of the probation conditions Plaintiff cannot
8 use, control or possess alcohol. In the psychologist report Dr. Harder states that the
9 Plaintiff "does not drink alcohol excessively" Plaintiff is not allowed to drink alcohol at
10 all, therefore, he is in violation of his probation requirements. Fourth, Plaintiff did not
11 tell the doctor the numerous times that he has threatened to commit suicide.
12 Attached hereto as **Exhibit "G"** is a copy of the Register of Actions for the
13 sentencing conditions on Plaintiff's case.

14 Psychological tests can predict general trends and behaviors, but are not
15 designed to predict future actions, thoughts, feeling or behaviors. For example, the
16 ability of psychological test to predict violence or suicide is limited. Dr. Harder states
17 in his Recommendations that "due to his past history, I could only recommend that
18 the court use caution and perhaps obtain information from third party data sources,
19 which were not available to this examiner, to assist them in making decisions about
20 custody. Such data might include police reports psychiatric records from Monte
21 Vista Hospital, to drug testing, and other third party statements, such as friends,
22 family, and co-workers." Therefore, Jennifer would like for the Court to order Plaintiff
23 to produce the records from Monte Vista Hospital, Las Vegas Recovery Center,
24 Spring Mountain Treatment Center where he was admitted for a couple of weeks and
25 any other mental institution he has been admitted to, have him drug tested and for
26 Plaintiff to have regular psychotherapy with a psychologist or therapist before
27 unsupervised visits are granted.
28

1 Plaintiff has not maintained a relationship with his children. He won't even call
2 them. The eldest child, Westin is so disillusioned with his father not calling him or
3 answering his calls that for the past year he has refused to call him. The children
4 have not visited with their father for over two years, in the best interest of the
5 children, Jennifer requests that if the Court finds that the psychological evaluation
6 report that Dr. Harder submitted is enough evidence of Plaintiff's mental stability to
7 grant him unsupervised visits with the children, Jennifer would like for the initial visits
8 be supervised at Donna's house and that the Court establish a reunification schedule
9 before overnight visits are granted to Plaintiff. Also, Jennifer request that since
10 Chevy is having surgery of the brain in July 1, 2013, that no overnight visits be
11 granted to Plaintiff until the child is stable.

12 NRS 125.480 Best interest of child; preferences; considerations of court;
13 presumption when court determines that parent or person residing with child is
14 perpetrator of domestic violence.

15 1. In determining custody of a minor child in an action brought under this
16 chapter, the sole consideration of the court is the best interest of the child. If it
17 appears to the court that joint custody would be in the best interest of the
18 child, the court may grant custody to the parties jointly.

19 2. Preference must not be given to either parent for the sole reason that the
20 parent is the mother or the father of the child.

21 3. The court shall award custody in the following order of preference unless in
22 a particular case the best interest of the child requires otherwise:

23 (a) To both parents jointly pursuant to NRS 125.490 or to either parent. If the
24 court does not enter an order awarding joint custody of a child after either
25 parent has applied for joint custody, the court shall state in its decision the
26 reason for its denial of the parent's application. When awarding custody to
27 either parent, the court shall consider, among other factors, which parent is
28 more likely to allow the child to have frequent associations and a continuing
relationship with the noncustodial parent.

(b) To a person or persons in whose home the child has been living and
where the child has had a wholesome and stable environment. Emphasis
added.

(c) To any person related within the third degree of consanguinity to the
child whom the court finds suitable and able to provide proper care and
guidance for the child, regardless of whether the relative resides within this
State.

(d) To any other person or persons whom the court finds suitable and able to
provide proper care and guidance for the child.

4. In determining the best interest of the child, the court shall consider and set
forth its specific finding concerning, among other things:

1 (a) The wishes of the child if the child is of sufficient age and capacity to form
2 an intelligent preference as to his custody;
3 (b) Any nomination by a parent or a guardian for the child;
4 © Which parent is more likely to allow the child to have frequent association
5 and a continuing relationship with the noncustodial parent.
6 (d) The level of conflict between the parents.
7 (e) The ability of the parents to cooperate to meet the needs of the child.
8 (f) The mental and physical health of the parents.
9 (g) The physical, developmental and emotional needs of the child.
10 (h) The nature of the relationship of the child with each parent.
11 (i) The ability of the child to maintain a relationship with any sibling.
12 (j) Any history of parental abuse or neglect of the child or sibling of the child.
13 (k) Whether either parent or any other person seeking custody has engaged in
14 an act of domestic violence against the child, a parent of the child or any other
15 person residing with the child.
16 5. Except as otherwise provided in subsection 6 or NRS 125C.210, a
17 determination by the court after an evidentiary hearing and finding by clear
18 and convincing evidence that either parent or any other person seeking
19 custody has engaged in one or more acts of domestic violence against the
20 child, a parent of the child or any other person residing with the child creates a
21 rebuttable presumption that sole or joint custody of the child by the perpetrator
22 of the domestic violence is not in the best interest of the child. Upon making
23 such a determination, the court shall set forth:
24 (a) Findings of fact that support the determination that one or more acts of
25 domestic violence occurred; and
26 (b) Findings that the custody or visitation arrangement ordered by the court
27 adequately protects the child and the parent or other victim of domestic
28 violence who resided with the child.
6. If after an evidentiary hearing held pursuant to subsection 5 the court
determines that each party has engaged in acts of domestic violence, it shall,
if possible, then determine which person was the primary physical aggressor.
In determining which party was the primary physical aggressor for the
purposes of this section, the court shall consider:
(a) All prior acts of domestic violence involving either party;
(b) The relative severity of the injuries, if any, inflicted upon the persons
involved in those prior acts of domestic violence;
(c) The likelihood of future injury;
(d) Whether, during the prior acts, one of the parties acted in self-defense;
and
(e) Any other factors which the court deems relevant to the determination.
In such a case, if it is not possible for the court to determine which party is the
primary physical aggressor, the presumption created pursuant to subsection 5
applies to both parties. If it is possible for the court to determine which party is
the primary physical aggressor, the presumption created pursuant to
subsection 5 applies only to the party determined by the court to be the primary
physical aggressor.
7. As used in this section, "domestic violence" means the commission of any
act described in NRS 33.018.

1 B. Plaintiff shall be ordered to pay 25% of his gross income for child
2 support and this amount should be retroactive to the day he started
3 working

4 Based on Plaintiff's unemployment benefits child support was set at \$400.00 a
5 month. Plaintiff was suppose to start making these payments June 1, 2011. Also,
6 the Decree specifically states that as soon as Plaintiff starts to work ,he is to forward
7 a copy of his paycheck to Attorney Aaron, who will forward it to Attorney Veiga and
8 the parties shall then Stipulate to child Support in the amount of 25% of Plaintiff's
9 current income. Well, Plaintiff never informed his attorney or Jennifer when he
10 started working, he also did not make his child support payments. Because Plaintiff
11 was not making child support Jennifer sought the assistance of the District
12 Attorney's Office Family Support Division. It was not until November 1, 2011 that the
13 District Attorney's office was able to start collecting child support payments from
14 Plaintiff's unemployment benefits.
15

16 The NCP Transaction History clearly demonstrates that in December 23,
17 2011, the District Attorney's office began to garnish Plaintiff's employment income.
18 He was working at that time and did not report it to Jennifer as he was required to do
19 so he could start paying 25% percent of his gross monthly income. This is why
20 Jennifer is requesting that the Court order Plaintiff to provide his paycheck stubs
21 from June 2011 until the present and to provide his 2011 and 2012 W-2's and tax
22 returns and that his child support be modified to 25% of his monthly income and that
23 it be retroactive to when he started working.
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1 Also, Dr. Harder's report states "He has been working as an Iron worker since
2 he was 17 years old. He is currently 33 years old. He denied having any trouble
3 maintaining employment."

4
5 **C. Attorney Fees**

6 Jennifer is requesting that Plaintiff be ordered to reimburse her for her
7 attorney's fees and costs.

8 In Lemming, the Nevada supreme held that the power of the court to award
9 Attorney fees in divorce actions remains part of the continuing jurisdiction of the court
10 in appropriate post-judgement motions relating to support and child custody.

11
12 Leeming v. Lemming, 87 Nev. 530, 532 490 P.2d 342, 343 (1971) Leeming was
13 cited with approval in Love v. Love, 114 Ne. 572, 581, 959 P. 2d 523, 529 (1998)

14 The supreme court stated in Love, that the district court's order and judgement did
15 not state the basis for its award of attorney's fees and costs. Id at 581. However,
16 the Supreme court went on to state that NRS 125.150(3) states that the court may
17 award reasonable Attorney's fees and cites to Leeming. Id.

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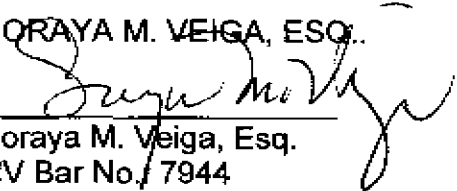
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III.
CONCLUSION

Based on the foregoing, Jennifer respectfully requests that this Honorable Court deny Plaintiff's Motion in it's entirety and grant her Countermotion in its entirety.

DATED this 17th day of April, 2013.

SORAYA M. VEIGA, ESQ.



Soraya M. Veiga, Esq.
NV Bar No. 7944
2595 South Torrey Pines Drive
Las Vegas, NV 89146
(702) 686-3371
Unbundled Attorney for Defendant

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of SORAYA M. VEIGA, ESQ., and
that on the 17th day of April, 2013, I did deposit in the U. S. Mail, at Las
Vegas, Nevada, in a sealed envelope with postage fully prepaid, a true and correct
copy of the above and foregoing DEFENDANT'S OPPOSITION TO PLAINTIFF'S
MOTION FOR AN EMERGENCY HEARING TO ENFORCE CHILD CUSTODY
AND/OR VISITATION ORDER ON AN ORDER SHORTENING TIME
AND DEFENDANT'S COUNTERMOTION FOR SUPERVISED VISITATION, FOR A
MODIFICATION OF CHILD SUPPORT AND TO REDUCE TO JUDGEMENT
PLAINTIFF'S CHILD SUPPORT ARREARS

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


An Employee of SORAYA M. VEIGA, ESQ..

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Matthew Robert Gerga)
Plaintiff/Petitioner)

CASE NO. D-10-430639

-vs-

Jennifer Elise Gannon)
Defendant/Respondent)

DEPT. T

**FAMILY COURT MOTION/OPPOSITION
FEE INFORMATION SHEET (NRS 19.0312)**

Party Filing Motion/ <u>Opposition</u> : <input type="checkbox"/> Plaintiff/Petitioner <input checked="" type="checkbox"/> Defendant/Respondent	
MOTION FOR/OPPOSITION TO <u>Plaintiff's Emergency Motion</u>	
<p style="text-align: center;"><u>Notice</u></p> <p>Motions and Oppositions to Motions filed after entry of final Decree or Judgment (pursuant to NRS 125, 125B & 125C) are subject to the Re-open Filing Fee of \$25.00, unless specifically excluded. (See NRS 19.0312)</p>	<p style="text-align: center;"><u>Excluded Motions/Oppositions</u></p> <p><input type="checkbox"/> Motions filed before final Divorce/Custody Decree entered (Divorce/Custody Decree NOT final)</p> <p><input type="checkbox"/> Child Support Modification ONLY</p> <p><input type="checkbox"/> Motion/Opposition For Reconsideration (Within 10 days of Decree) Date of Last Order _____</p> <p><input type="checkbox"/> Request for New Trial (Within 10 days of Decree) Date of Last Order _____</p> <p><input type="checkbox"/> Other Excluded Motion _____ (Must be prepared to defend exclusion to Judge)</p> <p><u>NOTE:</u> If no boxes are checked, filing fee MUST be paid.</p>
<input checked="" type="checkbox"/> Motion/Opp IS subject to \$25.00 filing fee <input type="checkbox"/> Motion/Opp IS NOT subject to filing fee	

Date: 4-17, 2012

Sonny M. Gerga
Printed Name of Preparer

Sonny M. Gerga
Signature of Preparer

EXHIBIT "A"

AFFIDAVIT OF JENNIFER GORDON


JENNIFER GORDON , being first duly sworn on oath states as follows:

1. That I am the Defendant in the above-entitled action. That I have personal knowledge of the following facts or state them on the basis of information and belief.
2. That I never relocated to the State of California with the minor children.
3. That I enrolled and attended Orientation at Open Arms.
4. That I was informed by Shawnda Thames, MBA of Open Arms that Plaintiff never enrolled in the program and never contacted them.
5. That I do not send my children to visit their paternal grandparents because I believe that they would allow the Plaintiff to visit with the children. That I inform the grandparents of the children's activities and the dates they play baseball, last year the grandparents attended all of the children's baseball games, even Plaintiff's sister attended some of the games. Also, the grandparents come to my house every holiday and they visit with the children and bring their grandsons presents.
6. That Plaintiff never calls the children. The our youngest child, Chevy calls his father frequently but the majority of the time his father does not answer the phone, the majority of the times Chevy ends up talking to Plaintiff's wife. Our eldest child, Westin stopped calling Plaintiff a year ago, because his father never answered the phone and because every time he made a promise to Westin he broke the promise.
7. That I inform Plaintiff of the children's medical care via text messages. He is aware that Chevy is having decompression surgery of the brain on July 1, 2013. He will be admitted at Sunrise Children's Hospital for an estimated five (5) days.
8. That Plaintiff never contacted me to inform me that he started working that I had to look for the assistance of the District Attorney's Office Family Support Division to collect the child support payments.


1 9. The children have not visited with their father for over two years, in the
2 best interest of the children, I request that if the Court finds that the
3 psychological evaluation report that Dr. Harder submitted is enough
4 evidence of Plaintiff's mental stability and the court is inclined to grant
5 him unsupervised visits with the children, I would like for the initial visits
6 be supervised at Donna's house and that the Court establish a
7 reunification schedule before overnight visits are granted to Plaintiff.
8 Also, I request that since Chevy is having surgery of the brain in July 1,
9 2013, that no overnight visits be granted to Plaintiff until the child is
10 stable.

11 FURTHER AFFIANT SAYETH NAUGHT.

12 DATED this 17 day of April, 2013.

13 
JENNIFER GORDON

14 SUBSCRIBED and SWORN to before me
15 this 17 day of April, 2013.

16 
17 NOTARY PUBLIC in and for
18 STATE OF NEVADA, COUNTY OF CLARK

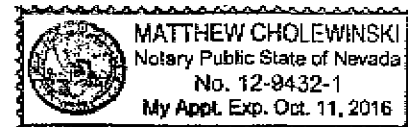
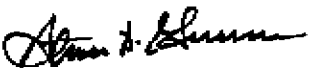


EXHIBIT “B”


CLERK OF THE COURT

1 VEIGA LAW OFFICES, P.C.
2 Soraya M. Veiga, Esq.
3 Nevada State Bar No. 007944
4 7464 W. Sahara Avenue
5 Las Vegas, Nevada 89117
6 (702) 991-7203
7 email: veigalawoffice@cox.net
8 Attorney for Defendant, Jennifer Elise Gordon

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DISTRICT COURT
FAMILY COURT
CLARK COUNTY, NEVADA

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

CASE NO. D-010-430639
DEPT. NO. T

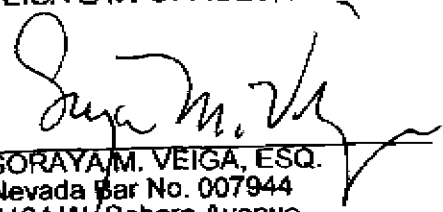
NOTICE OF ENTRY OF DECREE OF DIVORCE

PLEASE TAKE NOTICE that a Decree of Divorce was entered in the
above-entitled matter on the 27TH day of September, 2011, a copy of which is
attached hereto.

DATED: October 4th, 2011.

VEIGA LAW OFFICES, P.C.

By:


SORAYA M. VEIGA, ESQ.
Nevada Bar No. 007944
7464 W. Sahara Avenue
Las Vegas, Nevada 89117
Attorney for Defendant
Jennifer Elise Gordon

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CERTIFICATE OF EMAIL

I hereby certify that I am an employee of VEIGA LAW OFFICES, P.C. and
that on the 4th day of October 2011. I emailed a true and correct copy of
NOTICE OF ENTRY OF DECREE OF DIVORCE to:

Matthew Robert Geiger
8669 Horizon Wind Avenue Apt. 103
Las Vegas, Nevada 89178

Jennifer Elise Gordon
4047 Meadow Foxtail Drive
Las Vegas, Nevada 89122


An Employee of VEIGA LAW OFFICES, P.C.



CLERK OF THE COURT

1 SORAYA M. VEIGA, ESQ.
Nevada Bar No. 7944
2 VEIGA LAW OFFICES, P.C.
7464 W. Sahara Avenue
Las Vegas, Nevada 89117
3 Telephone (702) 991-7203
Facsimile (702) 228-6135
4 veigalawoffice@cox.net
Attorney for Defendant, Jennifer Elise Gordon

5
6 DISTRICT COURT
FAMILY DIVISION
7 CLARK COUNTY, NEVADA

8 MATTHEW ROBERT GEIGER

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

9 Plaintiff,

10 vs.

11 JENNIFER ELISE GORDON,

12 Defendant,

13 DECREE OF DIVORCE

14 This matter came to prove up for divorce on May 27, 2011, Plaintiff, Matthew
15 Robert Geiger, was present, and was represented by and through his attorney of
16 record, Chris A. Aaron, of the Law Office of Joseph A. Scalia, LTD, and Defendant,
17 Jennifer Elise Gordon, was present, and was represented by her attorney of record,
18 Soraya M. Veiga, Esq., of the Veiga Law Offices, P.C..

19 DISPOSITIONS

- 20 ☐ - Converted from
Blackstone
21 ☐ - Involuntary
Divorcement
☐ - Transferred
22 ☐ - Voluntary
Dismissal
☐ - Decision w/out
Trial/Hearing
23 ☐ - Decision w/
Hearing
☒ - Decision w/
Trial/Evidentiary
Hearing 24

25 Guardianship

- ☐ - Death
26 ☐ - Age of Majority
☐ - Restoration of
Competency
27 ☐ - Order
Terminating
Guardianship
Final Acct. 28

RECEIVED

AUG 31 2011

FAMILY COURT
DEPARTMENT

The parties having stipulated to the contents of this *Decree of Divorce*; the
Court having examined the evidence submitted herein; and the Court being fully
advised as to the law and facts of this case, **FINDS:**

That the Court has complete jurisdiction in the premises, both as to the
subject matter hereof, as well as the parties hereto;

That Defendant is, and has been, an actual and bonafide resident of the
County of Clark, State of Nevada, and has been actually domiciled therein for more
than six (6) weeks immediately preceding the commencement of this action; that all
allegations contained in Defendant's First Amended Counter Claim for Divorce are

1 true as therein alleged, except as denied by Plaintiff in his Answer to Counterclaim
2 for Divorce.

3 That Defendant is entitled to a *Decree of Divorce* from Plaintiff on the grounds
4 set forth in Defendant's Amended Counter claim for Divorce; that there are two (2)
5 minor children the issue of this marriage, to-wit: Weston Curtis Grieger, born
6 November 11, 2001 and Chevy Whalen Greiger, born August 11, 2004, that there
7 are no minor children adopted into this marriage, and that Defendant is not now
8 pregnant.

9 That the parties have agreed to all issues incident to this divorce action;

10 That the parties are incompatible in marriage and are entitled to a Decree of
11 Divorce on the grounds of incompatibility; and

12 That the parties have waived Findings of Fact, Conclusions of Law and Notice
13 of Entry of Decree of Divorce.

14 That Plaintiff is in Contempt for not complying with the Court's orders on
15 December 14, 2010 to obtain an psychological evaluation.

16 The Court advised Plaintiff's attorney, Chris Aaron, Esq., that Dr. Mark
17 Chambers does a good job on psychological evaluations and his address is: 8275 S.
18 Eastern Avenue, Suite 200, Las Vegas, NV 89123, phone number 702-614-4450.

19 Good cause appearing, therefor:

20 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that the parties are
21 granted a Decree of Divorce, forever dissolving the bonds of matrimony, and that the
22 parties are restored to the status of unmarried persons.

23 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that there are two
24 minor children the issue of this marriage, to-wit: Weston Curtis Grieger, born
25 November 11, 2001 and Chevy Whalen Greiger, born August 11, 2004;
26
27
28

1 **CHILD CUSTODY, VISITATION, AND SUPPORT**

2 **IT IS FURTHER ORDERED, ADJUDGED and DECREED** that the parties,
3 Jennifer Elise Gordon (hereinafter referred to as "Jennifer") and Matthew Robert
4 Geiger (hereinafter referred to as "Matthew") shall be awarded joint legal custody
5 custody of their minor children, Weston and Chevy with Jennifer having Primary
6 Physical Custody of the children.

7 **IT IS FURTHER ORDERED, ADJUDGED and DECREED** that Jennifer may
8 relocate to the State of California with the minor children.

9 **IT IS FURTHER ORDERED, ADJUDGED and DECREED** that Matthew shall
10 undergo a psychological evaluation and until such evaluation is completed, Matthew
11 shall have Supervised visitation with the children as follows:

12 A. While Jennifer is still living in Las Vegas, Matthew shall have
13 Supervised visitation with the children at Open Arms on Saturdays from 1:00 p.m. until
14 5:00 p.m. and on Sundays from 12:30 p.m. until 4:30 p.m. Parties shall split the costs
15 of the Open Arms fees.

16 B. After Jennifer moves to California and until the Court orders
17 unsupervised visits, Matthew shall have Supervised visitation with the children at Open
18 Arms one weekend a month for two (2) hours on Saturday and two (2) hours on
19 Sunday, preferably the second weekend of every month.

20 C. Upon Matthew completing the psychological evaluation, this matter
21 shall be re-noticed for a hearing so that the Court may review it and Matthew may
22 make an application to have unsupervised visits with the children. Plaintiff's counsel,
23 Mr. Aaron, may deliver th evaluation to Judge Nathan's chambers with a letter to be
24 lodged, not filed, and then there will be a hearing on the evaluation.

25 There shall be no unsupervised visitation without the Court reviewing Matthew's
26 psychological evaluation first and approving them.
27
28

1 When Matthew's psychological evaluation is successful, and the Court
2 approves the unsupervised visits the visitation shall be as follows:

3 1. Matthew shall have unsupervised visitation with the children two
4 (2) weekends a month, those being the second and fourth weekends, the parties will
5 meet in Barstow, California for the child exchange. The exchange shall be at
6 approximately 7:00 p.m. on the Friday, with a half hour window, unless the parties can
7 mutually agree on another time by text message. The return time shall be at 5:00 p.m.
8 on the Sunday.

9 The Court is giving father an offset for gas costs when parties start to
10 meet in Barstow, California. Counsel shall do the calculation as to that amount and is
11 to figure it into the Decree. *The Court finds that twenty dollars*
12 *is a fair amount for an offset for gas.*
13 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Matthew is now
14 under an Order To Show Cause for the psychological evaluation, which was ordered
15 back on December 14, 2010. If this matter comes before the Court for any reason and
16 the psychological evaluation has not been completed the Court will impose sanctions
17 on the contempt issued today.

18 IT IF FURTHER, ORDERED, ADJUDGED AND DECREED that the State of
19 Nevada, U.S.A. is the habitual residence of the children in accordance with N.R.S.
20 125A.290.

21 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that pursuant to
22 NRS 125A.350 the parties are put on notice that if custody has been established and
23 the custodial parent or a parent having joint custody intends to move their residence
24 to a place outside of this state and to take the child with them, they must, as soon as
25 possible and before th planned move, attempt to obtain the written consent of the
26 other parent to move the child from the state. If the noncustodial parent or other
27 parent having joint custody refuses to give that consent, the parent planning the
28 move shall, before they leave the state with the child, petition the Court for

1 permission to move the child. Failure to comply with the provisions of this section may
2 be considered as a factor if a change of custody is requested by the noncustodial
3 parent or other parent having joint custody.

4 **PENALTY FOR VIOLATION OF ORDER:** The abduction, concealment, or
5 detention of child in violation of this order is punishable as a category D felony as
6 provided in NRS 193.130. NRS 200.359 provides that every person having a limited
7 right to a child or any parent who willfully detains, conceals, or removes the child
8 from a parent, guardian, or other person having lawful custody or right of visitation of
9 a child in violation of an order of this Court, or removes the child from the jurisdiction
10 of the Court without the consent of either the Court or all persons who have the right
11 to custody or visitation is subject to being punished for a category D felony as
12 provided in NRS 193.130. NRS 125.510(6).

13 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Hague
14 Convention shall apply in certain circumstances outlined in NRS 125.510(7).

15 **CHILD SUPPORT**

16 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that because
17 Matthew is presently receiving unemployment benefits in the amount of \$1,600.00
18 per month, he shall pay child support in the amount of \$400.00 per month, for the
19 parties' minor children, effective June 1, 2011.

20 As soon as Matthew starts to work, he is to forward a copy of his paycheck to
21 Attorney Aaron, who will forward it to Attorney Veiga and the parties shall then
22 stipulate to Child Support in the amount of 25% of Matthew's current income.

23 The parents understand that pursuant to NRS 125B.145, either party may
24 request the Court to review the child support obligation every three (3) years or upon
25 a change in the circumstances of the payor parent and/or of the children.
26
27
28

1 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the children's
2 support obligation herein may be reviewed by the Court every three years in
3 accordance with NRS 125B.145.

4 **HEALTH CARE**

5 **ITS IS FURTHER ORDERED ADJUDGED AND DECREED** that Jennifer shall
6 provide medical and health insurance for the minor children, so long as Jennifer can
7 provide the same through her employer, until such time as each minor child reaches
8 the age of majority or marries or otherwise becomes emancipated before reaching
9 the age of majority. If the child is still attending school at the time he reaches the
10 age of majority, Jennifer shall continue providing medical insurance for the child, so
11 long as Jennifer can provide the same through her employer, until such time as each
12 reaches the age of eighteen (18) years old or graduates from high school, whichever
13 event occurs first.

14 The parties shall equally divide any unreimbursed and/or uncovered medical
15 expenses for the minor children, including, medical, dental, orthodontic, optical and
16 psychological expenses, pursuant to the 30/30 Rule. The parent incurring any
17 unreimbursed/uncovered medical expense shall have thirty (30) days from the date
18 they incur such an expense to request reimbursement from the other parent, and
19 provide a receipt or other proof of payment of such expense. The reimbursing
20 parent shall then have thirty (30) days to reimburse the parent incurring such
21 expense one-half (½) of such expense. Failure to request reimbursement for any
22 expense within thirty (30) days of incurring the same shall constitute a waiver of
23 reimbursement.

24 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that each party
25 shall submit the information required in NRS 125B.055, NRS 125.130 and NRS
26 125.230 on a separate form to the Court and the Welfare Division of the Department
27 of Human Resources within ten days from the date this Decree is filed. Such
28

1 information shall be maintained by the Clerk in a confidential manner and not part of
2 the public record. Each party shall update the information filed with the Court and
3 the Welfare Division of the Department of Human Resources within ten days should
4 any of that information become inaccurate.

5 **ALIMONY**

6 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that there shall
7 be no alimony paid from one party to the other and that this provision shall not be
8 modifiable in any way, any time for any reason.

9 **DISTRIBUTION OF COMMUNITY ASSETS AND DEBTS**

10 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Jennifer
11 shall receive as her sole and separate property, free from any claim of Matthew, the
12 following:

- 13 a. Any and all bank checking and savings or other financial institution
14 account held in Jennifer's name alone or jointly with another;
15 b. The 1989 Grand Marquis automobile, free and clear;
16 c. The 1990 Cadillac Seville automobile, free and clear;
17 d. One hundred percent of her pension;
18 e. Any and all furniture and furnishings in her possession and
19 f. All of Jennifer's jewelry, clothing and other personal belongings.

20 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Matthew shall
21 receive as his sole and separate property, free from any claim of Jennifer, the
22 following:

- 23 a. Any and all bank checking and savings or other financial institution
24 account held in Matthew's name alone or jointly with another;
25 b. The 1989 Blazer automobile, free and clear;
26 c. The 2005 Yamaha R1, free and clear;
27 d. The 1989 Jimmy automobile, free and clear;
28

- f. One hundred percent of his pension;
- g. Any and all furniture and furnishings in his possession and
- h. All of Matthew's jewelry, clothing and other personal belongings

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the debts of the marriage shall be adjudicated as follows:

Jennifer shall assume, pay, defend indemnify and hold Matthew harmless from the following debts and obligation, including, without limitation, the following:

- a. Any and all debts, encumbrances or liabilities, which are solely in Jennifer's name;
- b. Any and all other debts and obligations which have been incurred by Jennifer, alone, since the date of the parties' separation, to-wit: on or about January 1, 2010.
- c. Fifty percent (50%) of any and all debt associated with the foreclosure on December 25, 2010 of the marital residence, including but not limited to the debt with the mortgage company and fees incurred for the foreclosure.

Matthew shall assume, pay, defend indemnify and hold Jennifer harmless from the following debts and obligation, including, without limitation, the following:

- a. Any and all debts, encumbrances or liabilities, which are solely in Matthew's name;
- b. Any and all other debts and obligations which have been incurred by Matthew, alone, since the date of the parties' separation, to-wit: on or about January 1, 2010.
- c. Fifty percent (50%) of any and all debt associated with the foreclosure on December 25, 2010 of the marital residence, including but not limited to the debt with the mortgage company and fees incurred for the foreclosure.
- d. One hundred percent of any and all medical debt he incurred under his name.

1 e. Matthew shall reimburse Jennifer \$499.89 for the debt with Monitronics
2 Alarm system, which monthly debit is still currently being deducted from Jennifer's
3 current bank account.

4 f. Matthew shall be responsible for fifty percent (50%) of the debt with
5 Mountain View Christian School, in the amount of \$3,207.32.

6 g. Matthew shall pay Jennifer \$1,200.00, on or before June 27, 2011,
7 which will cover any and all un-reimbursed medical arrears and child support arrears
8 which were covered in the schedule of arrears, through May 15, 2011. This
9 \$1,200.00 will also include a debt Matthew had with Jennifer, for Jennifer paying
10 Matthew's car insurance through her bank account and those payments were
11 automatically deducted from her account from January 2010 through July 2010.

12 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that based upon
13 the above, that the division of property as stated hereinabove is fair and equitable.

14 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that any and all
15 accounts, including, but not limited to, credit card and charge accounts, utility
16 accounts, loans, and accounts for household services held by the parties jointly shall
17 be canceled, if any, and each party shall be solely responsible for obtaining new
18 accounts in his or her respective individual name. Each party shall indemnify and
19 hold the other party harmless from any and all liability arising from any account held
20 in his or her sole and separate name, or for which he or she is solely responsible, but
21 for which may create a community obligation as a result of the community status of
22 the parties or a party failing to remove the other party from the account.

23 **NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED and**
24 **DECREED** that the bonds of matrimony now and heretofore existing between
25 Jennifer and Matthew, are hereby dissolved, set aside, and forever held for naught;
26 and the parties hereto, and each of them, are hereby restored to all the rights and
27 privileges of single, unmarried persons.
28

1 **ADDITIONAL TERMS AND CONDITIONS**

2 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the parties
3 shall file separately for tax year 2011. Each party shall indemnify and hold harmless
4 the other from any tax liabilities, penalties or interest on their separately filed federal
5 income tax returns may generate.

6 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Jennifer
7 shall receive the child dependency exemption for the children each and every year.

8 **IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that each party
9 shall bear their own attorney's fees, costs and expert fees in this matter

10 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that pursuant to
11 the stipulation of the parties, the Eighth Judicial District Court, Family Law Division
12 shall retain jurisdiction over all matters.

13 **SEPARATE AGREEMENTS**

14 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that this decree of
15 Divorce is the full and final agreement between the parties and cannot be modified
16 except by mutual agreement of the parties and in writing.

17 **INDEMNIFICATION**

18 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the parties
19 hereto covenant and agree not to contract any debts, charges, or liabilities
20 whatsoever for which the other party, or the other party's property or estate, shall or
21 may become liable or answerable. In the event that a party hereto is made to
22 answer for the other party's debt or obligation, the other party shall indemnify and
23 hold harmless that party from such debt or obligation.

24 In the event that a creditor makes a party to this Decree of divorce liable for a
25 debt or obligation assigned to the other party in this decree of Divorce, the other
26 party shall indemnify and hold that party harmless from liability.
27
28

1 **ENFORCEMENT OF THIS DECREE OF DIVORCE**

2 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that should
3 either party, not be in compliance with this Decree of Divorce and should the
4 aggrieved party bring the appropriate action before any court to enforce said Decree,
5 then the non-compliant party shall be responsible to the aggrieved party for all
6 attorney's fees, costs and interest thereon, from the date of notice of non-
7 compliance.

8 **CONTEMPT OF COURT**

9 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that should either
10 party, not be in compliance with this Decree of Divorce, such action shall be
11 considered a contempt of court, and the noncompliant party shall be subject to any
12 sanction, on order imposed by the court, including but not limited to imprisonment
13 and/or fine.

14 **EXECUTION OF DOCUMENTS**

15 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the parties
16 shall cooperate and execute any and all documentation to effectuate the division of
17 assets and debts as stated hereinabove and that the parties will use good faith in
18 executing all such documents.

19 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Jennifer and
20 Matthew each covenant and represent to the other that they have made a full and
21 fair disclosure of all community an/or separate debts/liabilities, whether owned by
22 Jennifer and Matthew and/or the community, and that the same have been included
23 in this Decree. In the event that any additional debt/liability, whether owned by
24 Jennifer, Matthew and/or the community, which would otherwise constitute jointly
25 owned or community obligation, is discovered after the date of this Decree, such
26 debt/liability shall be the equal obligation of the parties. If a dispute arises between
27
28

1 the parties relative to responsibility for any undisclosed debt/liability, this Court shall
2 retain jurisdiction to adjudicate and resolve the dispute.

3 **DEFENDANT'S NAME**

4 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Jennifer shall
5 maintain her maiden name of "Gordon."

6 **NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND**
7 **DECREED** that the bonds of matrimony now and heretofore existing between
8 Plaintiff, Matthew Robert Geiger and Defendant, Jennifer Gordon, are hereby
9 dissolved, set aside, and forever held for naught; and the parties hereto, and each of
10 them, are hereby restored to all the rights and privileges of single, unmarried
11 persons.

12 DATED this 27th day of August, 2011.


13 IT IS SO ORDERED

14 
15 DISTRICT COURT JUDGE ct

16 GAYLE NATHAN

17 Respectfully submitted by:

18 VEIGA LAW OFFICES, P.C.

19 
20 SORAYA M. VEIGA, ESQ.
21 Nevada Bar No. 007944
22 7464 W. Sahara Avenue
23 Las Vegas, Nevada 89117
24 (702) 991-7203
25 Attorney for Defendant,
26 Jennifer Gordon
27
28

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REGISTER OF ACTIONS

CASE NO. D-10-430639-D

Matthew Robert Geiger, Plaintiff, vs. Jennifer Elise Gordon, Defendant.

5/26/2010 5:00 PM

Case Type: **Divorce - Complaint**
 Subtype: **Complaint Subject Minor(s)**
 Date Filed: **05/26/2010**
 Location: **Department T**
 Conversion Case Number: **D430639**

PARTY INFORMATION			
Defendant	Gordon, Jennifer Elise ** Confidential Address **	Female 5' 5", 110 lbs	Lead Attorneys Pro Se
Plaintiff	Geiger, Matthew Robert 8859 Horizon Wind AVE Las Vegas, NV 89178	Male 5' 10", 155 lbs	Chris A. Aaron <i>Retained</i> 702-253-0700(W)
Subject Minor Geiger, Chevy Whalen			
Subject Minor Geiger, Weston Curtis			
Male			

EVENTS & ORDERS OF THE COURT	
OTHER EVENTS AND HEARINGS	
05/26/2010	<u>Complaint for Divorce</u>
06/03/2010	<u>Proof of Personal Service of Summons and Complaint</u>
	<u>Affidavit of Service</u>
06/11/2010	<u>Answer and Counterclaim for Divorce</u>
06/11/2010	<u>Declaration Under Uniform Child Custody Jurisdiction Act</u>
06/11/2010	<u>Certificate of Mailing</u>
06/28/2010	<u>Reply to Counterclaim</u>
06/28/2010	<u>Certificate of Mailing</u>
07/15/2010	<u>NRCP 16.2 Case Management Conference</u>
	<u>Notice of</u>
08/27/2010	<u>Summons Issued Only</u>
	<u>Summons</u>
08/27/2010	<u>Joint Preliminary Injunction</u>
08/30/2010	<u>Case Management Conference (1:00 PM) (Judicial Officer Giuliani, Cynthia N.)</u>
	<u>Parties Present</u>
	<u>Minutes</u>
	Result: Evidentiary Hearing
08/30/2010	<u>Order for Family Mediation Center Services</u>
08/30/2010	<u>Notice of Seminar Completion EDCR 5.07</u>
08/30/2010	<u>Notice of Seminar Completion EDCR 5.07</u>
11/01/2010	<u>Return Hearing (11:00 AM) (Judicial Officer Giuliani, Cynthia N.)</u>
	<u>Return: Mediation And Child Interview Report</u>
	<u>Parties Present</u>
	<u>Minutes</u>
	Result: Partial Parenting Plan
11/01/2010	<u>Order</u>
	<u>Behavior</u>
11/01/2010	<u>Parenting Agreement</u>
	<u>Partial</u>
12/14/2010	<u>Evidentiary Hearing (1:30 PM) (Judicial Officer Giuliani, Cynthia N.)</u>
	<u>Parties Present</u>
	<u>Minutes</u>
	Result: Matter Heard
12/14/2010	<u>Referral Order for Outsourced Evaluation Services</u>
12/14/2010	<u>Referral Order for Outsourced Evaluation Services</u>
12/29/2010	<u>Order</u>
01/01/2011	<u>Administrative Reassignment to Department T</u>
	<u>Case reassigned from Department K</u>
01/03/2011	<u>Notice of Rescheduling of Hearing</u>
	<u>Notice of Rescheduling of Hearing</u>
01/19/2011	<u>Certificate of Mailing</u>
	<u>Certificate of Mailing</u>
01/19/2011	<u>Notice of Entry of Order</u>
01/20/2011	<u>Notice of Change of Address</u>
03/09/2011	<u>Return Hearing (2:00 PM) (Judicial Officer Nathan, Gayle)</u>
	<u>Return: Psychological Evaluation, Counseling, Child Interview Report, Parenting Classes</u>
	<u>Parties Present</u>
	<u>Minutes</u>

03/09/2011 *Reset by Court to 03/08/2011*

03/15/2011 **Result: Matter Heard**
Order Setting Evidentiary Hearing

03/18/2011 **Order Setting Evidentiary Hearing**
Child Interview (4:00 PM) (Judicial Officer Nathan, Gayle)
Judge to interview children w/Guardian Ad Litem Lynn Conant
Parties Present
Minutes

03/21/2011 **Result: Matter Heard**
Notice of Hearing
Notice of Hearing

03/25/2011 **Financial Disclosure Form**
Financial Disclosure Form

03/29/2011 **Return Hearing (3:00 PM) (Judicial Officer Nathan, Gayle)**
Return Child Interview
Parties Present
Minutes

04/12/2011 **Result: Matter Heard**
Notice of Appearance
Notice of Appearance

05/17/2011 **Return Hearing (3:00 PM) (Judicial Officer Nathan, Gayle)**
RETURN HEARING re: PSYCHOLOGICAL EVALUATION/COUNSELING/CHILD INTERVIEW REPORT/PARENTING CLASS
Parties Present
Minutes

05/17/2011 **Result: Matter Heard**
Schedule of Arraiges
Schedule of Arraiges

05/23/2011 **Pre-trial Memorandum**
Defendant's Pre-trial Memorandum

05/23/2011 **Witness List**
List of Witnesses & Exhibits

05/23/2011 **Amended Answer**
Defendant's First Amended Answer to Complaint for Divorce and Counterclaim for Divorce

05/25/2011 **Notice**
Notice Of Appearance

05/27/2011 **Evidentiary Hearing (9:30 AM) (Judicial Officer Nathan, Gayle)**
EVIDENTIARY HEARING
Parties Present
Minutes

05/27/2011 **Result: Divorce Granted**
Order
for Supervised Visitation

06/17/2011 **Notice of Seminar Completion EDCR 5.07**
Notice of Seminar Completion

06/27/2011 **Order**
Order From Hearing

06/28/2011 **Notice of Entry**
Notice of Entry of Order From Hearing

06/19/2011 **Withdrawal of Attorney**
Withdrawal Of Attorney

09/27/2011 **Decree of Divorce**
Decree of Divorce

10/06/2011 **Notice of Entry of Decree**
Notice of Entry of Decree of Divorce

10/06/2011 **Notice of Withdrawal**
Notice of Withdrawal of Attorney

04/04/2012 **Notice of Change of Address**

04/09/2013 **Motion**
Motion for an Emergency Hearing to Enforce Child Custody and/or Visitation Order on an Order Shortening Time

04/09/2013 **Family Court Motion Opposition Fee Information Sheet**

05/07/2013 **Motion to Enforce (10:00 AM) (Judicial Officer Nathan, Gayle)**
Motion for an Emergency Hearing to Enforce Child Custody and or Visitation Order on an Order Shortening Time.

FINANCIAL INFORMATION

	Counter Claimant Gordon, Jennifer Elise		236.00
	Total Financial Assessment		236.00
	Total Payments and Credits		0.00
	Balance Due as of 04/16/2013		
08/11/2010	Transaction Assessment		217.00
08/11/2010	Payment (Window)	Receipt # 2010-32001-FAM	(217.00)
05/24/2011	Transaction Assessment		7.00
05/24/2011	Payment (Window)	Receipt # 2011-20779-FAM	(7.00)
10/05/2012	Transaction Assessment		12.00
10/05/2012	Payment (Window)	Receipt # 2012-26607-FAM	(12.00)

Counter Defendant Geiger, Matthew Robert

	Total Financial Assessment		301.00
	Total Payments and Credits		301.00
	Balance Due as of 04/16/2013		0.00
05/26/2010	Transaction Assessment		289.00
05/26/2010	Payment (Window)	Receipt # 2010-28638-FAM	(289.00)
02/04/2013	Transaction Assessment		12.00
02/04/2013	Payment (Window)	Receipt # 2013-02968-FAM	(12.00)

Geiger, Matthew Robert
GEIGER, MATTHEW

EXHIBIT "C"

OPEN ARMS VISITATION CENTER, LLC
3630 N Rancho Drive Suite #107
Las Vegas, NV 89130

(702)570-6300
info@openarmsvisit.com



Receipt

DATE	RECEIPT #
06/11/2011	1141

SOLD TO

Jennifer E Gordon
4047 Meadow Foxtail Drive
Las Vegas, NV 89122

Date	Service	Quantity	Rate	Amount
06/11/2011	Orientation	1	25.00	25.00
TOTAL				\$25.00
AMOUNT RECEIVED				\$25.00
BALANCE DUE				\$0.00

If you have any questions regarding this receipt, please contact the office at (702) 570-6300

EXHIBIT “D”

Open Arms
Visitation Center, LLC

*Advocating for
the Preservation
of Families*

July 30, 2011

Family Court
Attn: Judge Nathan

RE: CLIENT NO-SHOW

Dear Honorable Judge Nathan,

This letter is to inform you parties related to case Geiger vs Gordon #D10-430639-D has yet to contact Open Arms Visitation Center, LLC to schedule court ordered visitation.

Open Arms completed orientation for Jennifer Gordon on June 11, 2011. However, we have yet to receive contact from Matthew Geiger.

If you have any questions, please contact our office at (702) 570-6300.

Thank you,

Shawnda Thames, MBA
Chief Executive Officer

Cc: Jennifer Gordon
File

Open Arms Visitation Center, LLC
3630 N Rancho Dr. Ste #107 Las Vegas, NV 89130
(702) 570-6300 • Fax (702) 570-6302

EXHIBIT “E”

JOBS REFERRAL/DISPATCH SLIP

INTERNATIONAL ASSOCIATION OF

BRIDGE/STRUCTURAL AND ORNAMENTAL

IRONWORKERS
 17495 Hunley Street East **LOCAL UNION 433** (626) 964-2500
 City of Industry, CA 91744 **AFL-CIO**

L 01447

EMPLOYEE George R. Matthews **DATE** 6/6/12

CONTRACTOR Designer Metals

CONTACT Joe **PHONE** 478-7939

JOB LOCATION NGM

Sub 10 x sub 10 x sub 10 x sub 10

WAGE RATE \$ 33.00 **Vacation \$** 3.00 **Hourly Pay \$** 36.00

REQUEST FOR REFERRAL HT-SS Cond. I.D.

Classification

- | | | |
|--|---|--|
| <input type="checkbox"/> FOREMAN | <input checked="" type="checkbox"/> STRUCTURAL IRONWORKER | <input type="checkbox"/> WELDER |
| <input type="checkbox"/> RIGGER | <input type="checkbox"/> SHEETER | <input type="checkbox"/> APPRENTICE |
| <input type="checkbox"/> FENCE ERECTOR | <input type="checkbox"/> SERV. STATION ERECTOR | <input type="checkbox"/> ORNAMENTAL FINISHER |

I, according to this referral the individual employer recognizes the District Council of Iron Workers of the State of California and vicinity and each of its affiliated Local Unions as the majority Collective Bargaining Representative of his or its employees employed in the State of California and the State of Nevada except for the Counties of Elko, Eureka and White Pine located in the State of California & Nevada covered by the Ironworkers Master Agreement and recognizes the Union as the exclusive Collective Bargaining Agent under Section 9(a) of the National Labor Relations Act for such employees and further agrees that he or it is bound by said Master Agreement including all wages, hours, and all other terms and conditions of such Master Agreement including the payment of all wage scales, and all Trust Fund contributions specified and required by said Master Agreement.

Report Time

7:45 PM **BUSINESS REPRESENTATIVE/DISPATCHER** R. [Signature]

SEASIDE PRINTING - LONG BEACH, CA 90802

1000014 100002

JOBS REFERRAL/DISPATCH SLIP

INTERNATIONAL ASSOCIATION OF

BRIDGE/STRUCTURAL AND ORNAMENTAL

Name Call IRONWORKERS 10/12
17495 Hurley Street East LOCAL UNION 433 (626) 964-2500
City of Industry, CA 91744 A.F.L.-C.I.O.

L 01158

EMPLOYEE Egger, Matthew DATE 3/1/12

CONTRACTOR Calley Steel

CONTACT Justin PHONE 239-0038

JOB LOCATION Army National Guard Bldg

Strickland Sub Area R & I Project

WAGE RATE \$ 20.00 Vacation \$ 24.12 Hourly Pay \$ 26.12

DATE AND TIME OF REQUEST FOR REFERRAL DN, 330 and 5 ID

Classification

- | | | |
|--|---|--|
| <input type="checkbox"/> FOREMAN | <input checked="" type="checkbox"/> STRUCTURAL IRONWORKER | <input type="checkbox"/> WELDER |
| <input type="checkbox"/> RIGGER | <input type="checkbox"/> SHEETER | <input type="checkbox"/> APPRENTICE |
| <input type="checkbox"/> FENCE ERECTOR | <input type="checkbox"/> SERV. STATION ERECTOR | <input type="checkbox"/> ORNAMENTAL FINISHER |

By accepting this referral the individual employee recognizes the District Council Iron Workers of the State of California and Mexico and each of its affiliated Local Unions as the majority Collective Bargaining Representative of his or its employees employed in the State of California and the State of Nevada except for the Counties of Elko, Esmeralda and White Pine located in the State of California & Nevada covered by the Ironworkers Master Agreement and recognizes the Union as the exclusive Collective Bargaining Agent under Section 8(a) of the National Labor Relations Act for such employees and further agrees that he or it is bound to said Master Agreement including all wages, hours, and all other terms and conditions of such Master Agreement including the payment of all wage scales, and all Trust Fund contributions specified and required by said Master Agreement.

Report Time

ASAP

X R. Conway / J. L.

BUSINESS REPRESENTATIVE/DISPATCHER

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73303514 MAC 2

JOBS REFERRAL/DISPATCH SLIP

INTERNATIONAL ASSOCIATION OF

BRIDGE/STRUCTURAL AND ORNAMENTAL
IRONWORKERS

17485 Hurley Street East
City of Industry, CA 91744

LOCAL UNION 433
A.F.L. - C.I.O.

(626) 964-2500

L 01283

EMPLOYEE

Geiger, Matthew DATE 3/16/12

CONTRACTOR

Lally Street

CONTACT

Justin

PHONE

283-4005

JOB LOCATION

Office

WAGE RATE \$ 22.00 Vacation \$ 3.12 Hourly Pay \$ 35.12

DATE AND TIME OF
REQUEST FOR REFERRAL

3/15/12 Bid: I.D.

☐ FOREMAN

☐ RIGGER

☐ FENCE
ERECTOR

Classification

☐ STRUCTURAL
IRONWORKER

☐ SHEETER

☐ SERV. STATION
ERECTOR

☒ WELDER

☐ APPRENTICE

☐ ORNAMENTAL
FINISHER

By accepting this referral, the individual employee recognizes the District Council of Iron Workers of the State of California and vicinity and each of its affiliated Local Unions as the majority Collective Bargaining Representative of his or its employees employed in the State of California and the State of Nevada except for the Counties of Elko, Eureka and White Pine located in the State of California & Nevada covered by the Ironworkers Master Agreement and recognizes the Union as the exclusive Collective Bargaining Agent under Section 9(a) of the National Labor Relations Act for such employees and further agrees that he or it is bound to said Master Agreement including all wages, hours, and all other terms and conditions of such Master Agreement including the payment of all wage scales, and all Trust Fund contributions specified and required by said Master Agreement.

Report Time

ASAP

x R. Gonzalez / R.R.

BUSINESS REPRESENTATIVE/DISPATCHER

BRIDGE PRINTING LONG BEACH, CA 90805

21-13314-1-1/02

EXHIBIT “F”

Report Date: 04/16/2013

**Account Balance Summary Report
for Matthew Geiger, Non Custodial Parent**

	Case Total	Docket Total	Arrears	Interest	Penalty
Grand Total For NCP	4386.32	4386.32	4092.74	0.00	293.58
905053200A: Gordon, Jennifer	4386.32		4092.74	0.00	293.58
R-13-176576-R / 02		4386.32	4092.74	0.00	293.58
Grand Total For NCP	4386.32	4386.32	4092.74	0.00	293.58

These figures have been calculated using information in the possession of the District Attorney's Office

DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 E. FLAMINGO RD SUITE 100
LAS VEGAS NV 89119

**DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 E. FLAMINGO RD SUITE 100
LAS VEGAS NV 89119**

NCP Financial Transaction History

Date: 04/16/2013

NCP: Matthew Gelger
CST: Jennifer Gordon

Obligation: Child Support
Office: Clark Co District Attorney

Docket#: R-13-176576-R

PAID

Case ID: 905053200A
Transaction Date From: 10/20/2011
Transaction Date To: 04/16/2013

PAID

Received Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Credit Balance	Arrears Distributed	Interest Distributed	Interest Charged	Penalty Distributed	Penalty Charged
Totals											
04/08/2013	04/09/2013	Income Withholding		101.54							
04/01/2013	04/02/2013	Income Withholding		101.54							
04/01/2013	04/01/2013	Monthly Obligation	400.00								
03/25/2013	03/26/2013	Income Withholding		95.38							
03/18/2013	03/20/2013	Income Withholding		101.54							
03/11/2013	03/12/2013	Income Withholding		101.54							
03/12/2013	03/12/2013	Manual Arrears Adjustment		101.54							
03/04/2013	03/07/2013	Income Withholding		101.54							
03/01/2013	03/01/2013	Monthly Obligation	400.00								
02/28/2013	02/28/2013	Month end accrual of Interest/Penalty			196.92						19.69
02/28/2013	02/28/2013	Month end accrual of Unpaid Support									
02/26/2013	02/27/2013	Income Withholding		101.54							
02/19/2013	02/20/2013	Income Withholding		101.54							
02/01/2013	02/01/2013	Monthly Obligation	400.00								19.69
01/31/2013	01/31/2013	Month end accrual of Interest/Penalty			196.92						
01/31/2013	01/31/2013	Month end accrual of Unpaid Support									
01/16/2013	01/16/2013	Income Withholding		101.54							
01/04/2013	01/07/2013	Income Withholding		101.54							
12/31/2012	01/03/2013	Income Withholding					6.16				-9.53
01/03/2013	01/03/2013	Month end accrual of Interest/Penalty									
12/31/2012	01/03/2013	Income Withholding		95.38							
01/01/2013	01/01/2013	Monthly Obligation	400.00								
12/31/2012	12/31/2012	Month end accrual of Interest/Penalty									9.53

12/31/2012	12/31/2012	Month end accrual of Unpaid Support							
12/27/2012	12/28/2012	Income Withholding		101.54	95.38				

101.54

Received Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Credit Balance	Arrears Distributed	Interest Distributed	Interest Charged	Penalty Distributed	Penalty Charged
12/14/2012	12/14/2012	Income withholding		101.54							
12/11/2012	12/12/2012	Income withholding		101.54							
11/30/2012	12/03/2012	Income withholding					101.54				
12/01/2012	12/01/2012	Monthly Obligation	400.00								
11/26/2012	11/27/2012	Income withholding		95.38			6.16				
11/20/2012	11/20/2012	Income withholding		101.54							
11/13/2012	11/14/2012	Income withholding		101.54							
11/05/2012	11/07/2012	Income withholding		101.54							
11/01/2012	11/01/2012	Monthly Obligation	400.00								
10/29/2012	10/31/2012	Income withholding					101.54				
10/19/2012	10/22/2012	Income withholding					101.54				
10/12/2012	10/15/2012	Income withholding					101.54				
10/05/2012	10/08/2012	Income withholding		95.38			6.16				
10/01/2012	10/03/2012	Income withholding		304.62							
10/01/2012	10/01/2012	Monthly Obligation	400.00								
09/30/2012	09/30/2012	Month end accrual of Interest/Penalty									26.20
09/30/2012	09/30/2012	Month end accrual of Unpaid Support			262.00						
09/18/2012	09/19/2012	Income withholding		138.00							
09/01/2012	09/01/2012	Monthly Obligation	400.00								
08/31/2012	08/31/2012	Month end accrual of Interest/Penalty									40.00
08/31/2012	08/31/2012	Month end accrual of Unpaid Support			400.00						
08/01/2012	08/01/2012	Monthly Obligation	400.00								
07/31/2012	07/31/2012	Month end accrual of Interest/Penalty									40.00
07/31/2012	07/31/2012	Month end accrual of Unpaid Support			400.00						
07/01/2012	07/01/2012	Monthly Obligation	400.00								
06/30/2012	06/30/2012	Month end accrual of Interest/Penalty									19.69
06/30/2012	06/30/2012	Month end accrual of Unpaid Support			196.92						
06/11/2012	06/13/2012	Income withholding		101.54							
06/01/2012	06/04/2012	Income withholding		101.54							
06/01/2012	06/01/2012	Monthly Obligation	400.00								
05/29/2012	05/31/2012	Income withholding		95.38			6.16				
05/18/2012	05/18/2012	Income withholding		101.54							
05/11/2012	05/11/2012	Income withholding		101.54							

Received Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Credit Balance	Arrears Distributed	Interest Distributed	Interest Charged	Penalty Distributed	Pen: Char
05/01/2012	05/01/2012	Monthly Obligation	400.00								
04/30/2012	04/30/2012	Month end accrual of Interest/Penalty									
04/30/2012	04/30/2012	Month end accrual of Unpaid Support			400.00						
04/01/2012	04/01/2012	Monthly Obligation	400.00								
03/31/2012	03/31/2012	Month end accrual of Interest/Penalty									
03/31/2012	03/31/2012	Month end accrual of Unpaid Support			196.92						
03/01/2012	03/02/2012	Income withholding		203.08							
03/01/2012	03/01/2012	Monthly Obligation	400.00								
02/29/2012	02/29/2012	Month end accrual of Interest/Penalty									
02/29/2012	02/29/2012	Month end accrual of Unpaid Support			196.92						
02/13/2012	02/14/2012	Income withholding		203.08							
02/01/2012	02/01/2012	Monthly Obligation	400.00								
01/27/2012	01/27/2012	Income withholding		196.92							
01/17/2012	01/18/2012	Income withholding		203.08							
01/01/2012	01/01/2012	Monthly Obligation	400.00								
12/31/2011	12/31/2011	Month end accrual of Interest/Penalty									
12/31/2011	12/31/2011	Month end accrual of Unpaid Support			95.39						
12/23/2011	12/23/2011	Income withholding		203.08							
12/01/2011	12/02/2011	Unemployment Insurance Benefit Payment		101.53							
12/01/2011	12/01/2011	Monthly Obligation	400.00								
11/30/2011	11/30/2011	Month end accrual of Interest/Penalty									
11/30/2011	11/30/2011	Month end accrual of Unpaid Support			95.41						
11/21/2011	11/22/2011	Unemployment Insurance Benefit Payment		101.53							
11/14/2011	11/15/2011	Unemployment Insurance Benefit Payment		101.53							
11/07/2011	11/08/2011	Unemployment Insurance Benefit Payment		101.53							
11/01/2011	11/01/2011	Month end accrual of Interest/Penalty									
10/31/2011	11/01/2011	Unemployment Insurance Benefit Payment		101.54							
11/01/2011	11/01/2011	Monthly Obligation	400.00								
10/31/2011	10/31/2011	Month end accrual of Interest/Penalty									
10/31/2011	10/31/2011	Month end accrual of Unpaid Support			400.00						
10/20/2011	10/20/2011	Monthly Obligation	400.00								
10/20/2011	10/20/2011	Order Entry									
Totals											

EXHIBIT “G”

Skip to Main Content Logout My Account Search Menu New District Civil/Criminal
Search Refine Search Close

Location : District Court Civil/Criminal Help

REGISTER OF ACTIONS

CASE No. 10C262424

The State of Nevada vs Matthew R Geiger

Case Type: **Felony/Gross
Misdemeanor**
Date Filed: **02/26/2010**
Location: **Department 25**
Conversion Case Number: **C262424**
Defendant's Scope ID #: **1419268**
Lower Court Case Number: **09F08763**

RELATED CASE INFORMATION

Related Cases

09F08763X (Bind Over Related Case)

PARTY INFORMATION

Defendant **Geiger, Matthew R Also Known
As Geiger, Matthew**

Lead Attorneys
Todd M. Leventhal
Retained
7023841990(W)

Plaintiff **State of Nevada**

Steven B Wolfson
702-671-2700(W)

CHARGE INFORMATION

Charges: Geiger, Matthew R

1. UNLAWFUL POSSESSION OF A CONTROLLED
SUBSTANCE NOT FOR PURPOSE OF SALE.

Statute
453.336

Level
Felony

Date
01/01/1900

EVENTS & ORDERS OF THE COURT

11/10/2010 **Sentencing (9:00 AM) (Judicial Officer Mosley, Donald)**

Minutes

11/10/2010 9:00 AM

- By virtue of his plea and by Order of this Court, DEFENDANT GEIGER ADJUDGED GUILTY of POSSESSION OF CONTROLLED SUBSTANCE (F). Statements by Mr. Stephens, Defendant and Mr. Leventhal. COURT ORDERED, in addition to the \$25 Administrative Assessment fee, \$60 Drug Analysis fee and \$150 DNA Analysis fee including testing to determine genetic markers, DEFENDANT SENTENCED to the Nevada Department of Corrections for a MAXIMUM term of FORTY-EIGHT (48) MONTHS with a MINIMUM parole eligibility of NINETEEN (19) MONTHS; SUSPENDED; placed on PROBATION for a FIXED term of FIVE (5) YEARS. CONDITIONS: 1. Search clause. 2. Enter and successfully complete substance abuse counseling and submit to UA's upon request. 3. Have no use, possession or control of alcohol. 4. Complete 16 hours of community service work EACH MONTH of probation. 5. Maintain full time employment. 6. Submit to genetic markers testing and pay a \$150 fee to the Clerk of the Court. Defendant was advised that probation is a one time offer in this Dept., if he does not follow the conditions listed above, he will be revoked and sent to prison. BOND, if any, EXONERATED. NIC

Parties Present

Return to Register of Actions

THIS SEALED
DOCUMENT,
NUMBERED PAGE(S)
214 - 220
WILL FOLLOW VIA
U.S. MAIL

Alison D. Blum

CLERK OF THE COURT

1 AFFT

(Your name) Matthew Robert Geiger

2 (Address) 8659 Horizon Wind Ave #102

3 Las Vegas, NV 89178

4 (Telephone) _____

5 In Proper Person

6 DISTRICT COURT

7 CLARK COUNTY, NEVADA

8 Matthew Robert Geiger)

9 Plaintiff)

Case No.: D-10-430639

Dept. No.: T

10 vs.)

11 Jennifer Elise Gordon)

12 Defendant.)

13 **AFFIDAVIT OF SERVICE**

14 STATE OF NEVADA)

15 COUNTY OF CLARK)

ss:

16 (Third party's name) Angela Newman being duly sworn says: That at all times
17 herein affiant was and is over 18 years of age and not a party to nor interested in the proceeding in
18 which this affidavit is made. That affiant received (number) 1 copy(ies) of the (name of
19 documents being served) Emergency to enforce Child custody
20 and Visitation on the (day) 9 day of (month) April
21 (year) 2013 and served the same on the (day) 9 day of (month) April (year)
22 2013 by: mailed
23 Angela Newman

24 (COMPLETE ONLY ONE PARAGRAPH)

25 ☐

Delivering and leaving a copy with the ☐ Plaintiff ☐ Defendant at

26 (address) _____

27 © Clark County Family Law Self-Help Center

December 14, 2004

28 ALL RIGHTS RESERVED

1

general.doc/affserv.5

Use only most current version

Please call the Self-Help Center to confirm most current version.

OR

☐ Serving the ☐ Plaintiff/☐ Defendant by personally delivering and leaving a copy with (name of person you left the documents with)

a person of suitable age and discretion residing at the ☐ Plaintiff's/ ☐ Defendant's usual place of abode located at (address) _____

OR

☐ (Use if the service is upon an agent of the Plaintiff or Defendant) Serving the ☐ Plaintiff/☐ Defendant by personally delivering and leaving a copy at (address) _____

with (check one) ☐ (name) _____, an agent lawfully designated by statute to accept service of process/ ☐ (name) _____, pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

OR

☒ Personally depositing a copy in a mail box of the United States Post Office, enclosed in a sealed envelope postage prepaid (check one) ☐ ordinary mail/ ☒ certified mail, return receipt requested/ ☐ registered mail, return receipt requested addressed to the ☐ Plaintiff/ ☒ Defendant

///

///

///

///

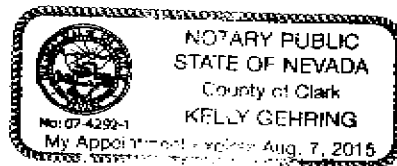
///

at his/her last known address which is (address) 91 Autumn Day St Henderson, NV 89012

Signature of Person Making Service

SUBSCRIBED and SWORN to before
me this 12th day of
(month) APRIL (year) 2013.

NOTARY PUBLIC



UNITED STATES POSTAL SERVICE

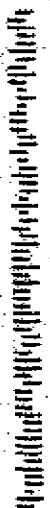


First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Matthew Robert Geiser
8659 Horizon Wind Ave #102
Las Vegas, NV 89178

78873327



PS Form 3811, February 2004

Domestic Return Receipt

2. Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.

3. Article Addressed to:

Jennifer Jordan
91 Autumn Day St
Henderson, NV 89012

4. Signature: 
5. Restricted Delivery? (Item 15a) ☐ Yes ☒ No
6. Date of Delivery: ☐ Agent ☒ Addressee
7. Restricted Delivery? (Item 15b) ☐ Yes ☒ No

8. Service Type: ☒ Certified Mail ☐ Registered Mail ☐ Signature Required ☐ Signature Required for Merchandise ☐ Insured Mail ☐ Registered Delivery? (Item 15a) ☐ Yes ☒ No

9. Article Number: 7012 2920 0000 1174 0929

PS Form 3811, February 2004

Domestic Return Receipt

102556-02-M-1040

efiled

MAY 07 2013

SORAYA M. VEIGA, ESQ.
Nevada Bar No. 7944
7464 W. Sahara Avenue
Las Vegas, Nevada 89117
Telephone (702) 686-3371
veigalawoffice@cox.net
Unbundled Attorney for Defendant, Jennifer Elise Gordon

CLERK OF THE COURT

**DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA**

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

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

CERTIFICATE OF MAILING

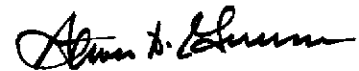
I hereby certify that on the 7st day of May, 2013. I did deposit in the
United States Post Office, at Las Vegas, Nevada, in a sealed envelope with postage
fully pre-paid thereon, a true and correct copy of DEFENDANT'S FINANCIAL
DISCLOSURE FORM to:

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

Submitted by:

SORAYA M. VEIGA, ESQ.

SORAYA M. VEIGA, ESQ.
Nevada State Bar No.: 7944
7464 W. Sahara Avenue
Las Vegas, Nevada 89117
Unbundled Attorney for Defendant



CLERK OF THE COURT

CERT
MOLLY ROSENBLUM, ESQ.
Nevada Bar No. 08242
CORINNE WURM, ESQ.
Nevada Bar No. 12141
ROSENBLUM LAW OFFICES
330 E Charleston Blvd, Ste 100
Las Vegas, Nevada 89104-1034
(702) 400-0000
Email: family@halfpricelawyers.com
Attorney for Plaintiff
in an Unbundled Capacity

DISTRICT COURT—FAMILY DIVISION
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,

Plaintiff,

vs.

JENNIFER ELISE GORDON,

Defendant

Case No.: **D-10-430639-D**
Dept. No.: **T**

CERTIFICATE OF MAILING

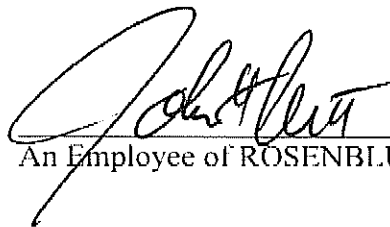
I hereby certify that service of the foregoing document:

1. Notice of Withdrawal as Attorney

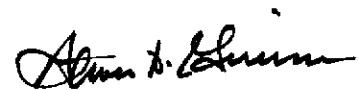
was made this 13th day of May, 2013, by depositing a copy of the same in
the U.S. Mails at Las Vegas, Nevada, postage prepaid, addressed to:

Soraya M. Veiga, Esq
2595 S Torrey Pines Dr
Las Vegas NV 89146-5136
Attorney for Plaintiff

Matthew Geiger
8659 Horizon Wind Ave Unit 102
Las Vegas NV 89178-8733
Defendant in Proper Person



An Employee of ROSENBLUM LAW OFFICES



CLERK OF THE COURT

NOW
MOLLY ROSENBLUM, ESQ.
Nevada Bar No. 08242
CORINNE WURM, ESQ.
Nevada Bar No. 12141
ROSENBLUM LAW OFFICES
330 E Charleston Blvd, Ste 100
Las Vegas, Nevada 89104-1034
(702) 400-0000
Email: family@halfpricelawyers.com
Attorney for Plaintiff
in an Unbundled Capacity

**DISTRICT COURT—FAMILY DIVISION
CLARK COUNTY, NEVADA**

MATTHEW ROBERT GEIGER,

Plaintiff,

vs.

JENNIFER ELISE GORDON,

Defendant

)
)
) Case No.: **D-10-430639-D**
) Dept. No.: **T**
)
)
)

NOTICE OF WITHDRAWAL

ROSENBLUM LAW OFFICES, was retained by Plaintiff **MATTHEW ROBERT GEIGER**, in an "unbundled capacity," and now files this Notice Of Withdrawal Of Attorney pursuant to E.D.C.R. 5.28(b). ROSENBLUM LAW OFFICES was retained to provide a limited service and is withdrawing from the case because their service was completed. Please substitute Plaintiff **MATTHEW ROBERT GEIGER** as a party in Proper Person.

...

...

...

1 Plaintiff **MATTHEW ROBERT GEIGER** can be served with notice of further proceedings
2 taken in this case at:

3 8659 Horizon Wind Ave Unit 102
4 Las Vegas NV 89178-8733
5 (702) 449-3506

6 DATED this 13th day of May, 2013.

7
8 Submitted by:
9 **ROSENBLUM LAW OFFICES**

10 /s/ Molly Rosenblum, Esq. #8242

11
12 **MOLLY ROSENBLUM, ESQ.**
13 Nevada Bar No. 08242
14 330 E Charleston Blvd, Ste 100
15 Las Vegas, Nevada 89104-1034
16 (702) 400-0000
17 Email: family@halfpricelawyers.com
18 Attorney for Plaintiff
19 in an Unbundled Capacity
20
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28

2012
FEE AGREEMENT FOR UNBUNDLED FAMILY LAW SERVICES

STOKES & STOKES, LTD.

ATTORNEYS AT LAW

330 E. Charleston Boulevard, Suite 100
Las Vegas, Nevada 89104

Tel: (702) 400-0000 Fax: (702) 400-0001

Original

Date: 04/25/2013
Client: **GEIGER, MATTHEW**
Address: 8659 Horizon Wind Ave., Unit 102, LV, NV 89178
Telephone No.: 702-449-3506
E-mail:

231585

44479

Preferred Method of Contact: TELEPHONE ☒ EMAIL ☐ MAIL ☐

This **ATTORNEY-CLIENT FEE CONTRACT** ("Contract") is entered into by and between **Matthew Geiger** ("Client") and **STOKES & STOKES, LTD.** ("Attorney"). You have requested that we represent you at a single motion hearing as detailed below.

Department:

Type of Hearing: Motion Hearing

Attorney's Fees:

Costs:

PAYMENT PLAN:

Paying my legal fees and costs through Automatic Payments from my debit card (AUTO PAY) has been discussed and offered to me and I am declining that option, at this time. _____

CLIENT UNDERSTANDS, AND AGREES, THAT ALL MONEY PAID UNDER THIS CONTRACT IS NON-TRANSFERABLE AND THEREFORE CANNOT BE APPLIED TO ANY OTHER CONTRACT OR LEGAL MATTER WITH OUR OFFICE. _____

CLIENT UNDERSTANDS THAT A NEW FEE AGREEMENT MUST BE SIGNED BY BOTH ATTORNEY AND CLIENT FOR ANY WORK TO BE PERFORMED BY ATTORNEY BEYOND THE SCOPE OF THIS AGREEMENT.

Attorney's fees and costs must be paid in full prior to the drafting of documents or filing of your case.

IF CLIENT FAILS TO TIMELY MAKE ANY PAYMENT TO ATTORNEY, THIS CONTRACT SHALL BE VOID WITH NO REFUNDS GIVEN. ATTORNEY WILL NOT RELEASE ANY DOCUMENTS TO CLIENT UNTIL ALL LEGAL FEES AND COSTS ARE PAID IN FULL.

ABSOLUTELY NO REFUNDS ARE GIVEN UNDER ANY CIRCUMSTANCES AS ALL FEES ARE DEEMED EARNED WHEN RECEIVED BY ATTORNEY AS ALL WORK BEGINS IMMEDIATELY. CLIENT WAIVES ANY RIGHTS TO A REFUND IN CONSIDERATION OF ATTORNEY CHARGING CLIENT THE REDUCED LEGAL FEE IDENTIFIED BY THIS AGREEMENT. CLIENT EXPRESSLY WAIVES ANY RIGHT TO CHARGE BACK ANY CREDIT OR DEBIT CARD FOR ANY CHARGES PROCESSED IN FURTHERANCE OF THIS CONTRACT.

CLIENT AGREES THAT SHOULD CLIENT TERMINATE THIS AGREEMENT EITHER AFFIRMATIVELY BY ACTION OF CLIENT OR BY CLIENT FAILING TO TIMELY MAKE ANY PAYMENT, ATTORNEY SHALL BE ENTITLED TO LEGAL FEES AT THE NON-DISCOUNTED ATTORNEY HOURLY RATE OF \$375.00 AND PARALEGAL/ASSISTANT TIME SHALL BE CHARGED AT AN HOURLY RATE OF \$125.00.

CLIENT FURTHER AGREES THE SOLE FORUM FOR ADJUDICATING ANY DISPUTE BETWEEN THE PARTIES CONCERNING THIS CONTRACT SHALL BE THE STATE BAR OF NEVADA FEE DISPUTE COMMITTEE.

The prices reflected for costs are estimates provided as a courtesy to CLIENT only. CLIENT must pay actual costs should any changes exist between the actual amounts and amounts estimated above. Costs, when in excess of what has been estimated above, are due and payable immediately upon notice to the CLIENT of the additional costs. Failure by the CLIENT to pay such additional costs will immediately result in Attorney stopping ALL work on CLIENT'S case and withdrawing from CLIENT's case, if necessary.

From and after your acceptance of this Agreement, this Agreement shall constitute our written engagement agreement. This Contract incorporates the firm's published low price guarantee and no further price adjustments shall be made after execution of this Agreement.

Thank you for retaining us. Please call me with questions, comments or concerns.

CLIENT
x Matthew Geiger
(PRINT NAME)

x [Signature]
(CLIENT SIGNATURE)

ATTORNEY
STOKES & STOKES, LTD.

[Signature]

**PLEADING
CONTINUES
IN NEXT
VOLUME**