

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Sep 16 2015 10:57 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 2

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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DISCLOSURE TO FAMILY LAW CLIENTS: READ CAREFULLY

1. I will not sign this Disclosure if I do not completely understand and agree with its terms. Furthermore, while at the initial consultation, I may refuse to sign this Disclosure and obtain from attorney a complete refund of any money I may have paid.

2. The attorney responsible for my case is:

Attorney Name: Molly S. Rosenblum, Esq. ("ROSENBLUM")
Nevada State Bar ID #: 8242 Nevada Admission Date: 10/11/2002
Law Firm Name: Rosenblum Law Offices
Firm Address: 330 E. Charleston Blvd., #100, LV, NV 89104
Email: molly@halfpricelawyers.com Tel: (702) 400-0000

3. I consent and agree:

- a. to a division of legal fees between Stokes & Stokes, Ltd. d/b/a Half Price Lawyers ("HPL") and ROSENBLUM (a different law firm) in the proportion of two-thirds (2/3) to HPL and one-third (1/3) to ROSENBLUM; and
- b. that HPL and ROSENBLUM may share my information between them; and
- c. that the total attorney fees charged to me are both fair and reasonable.

4. I also understand and agree:

- a. HPL provides marketing services and also provides client consultation services to clients like me for ROSENBLUM; and
- b. ROSENBLUM shall provide the contracted legal services to me; and
- c. I will address all questions concerning my case to ROSENBLUM; and
- d. HPL does not supervise ROSENBLUM and possesses no managerial control whatsoever over ROSENBLUM's handling of family law cases like mine; and
- e. HPL does not manage, supervise or employ ROSENBLUM or ROSENBLUM's employees.

I, Matthew Geiger, understand and agree to the terms disclosed above.

Matthew Geiger
PRINT CLIENT NAME

[Signature]
CLIENT SIGNATURE

4/25/2013
DATE

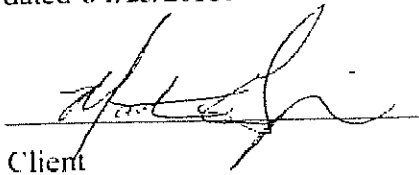
Unbundled Legal Services Explained

Dear Client:

In an effort to reduce the financial burden of expensive family legal services, the lawyers at Stokes & Stokes, Ltd. d/b/a Half Price Lawyers have decided to represent most clients in what is called an "Unbundled Legal Services" capacity. The purpose of this sheet is to give you a better understanding of what you are retaining our law firm to do for you.

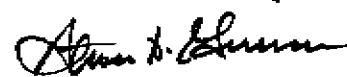
Unbundled Legal Services, also known as "limited legal services" or "discrete task representation," is a term that applies when you use a lawyer for a specific limited service. You essentially purchase the legal services or advice you need at a single point in time and no more. You enter into an Unbundled Legal **Services Retainer Agreement** specifying the scope of representation (the work to be performed), and usually for a fixed price. Once the work requested in that signed retainer agreement has been performed, the Attorney has no obligation to perform additional work unless you and the Attorney agree to additional work in a new signed retainer agreement and payment is received by our office.

I acknowledge that I have received the forgoing explanation and understand that this Agreement is in an unbundled capacity for only the specific legal services outlined in my fee agreement dated **04/25/2013**.


Client

4-25-13
Date

efiled 20
MAY 29 2013


CLERK OF THE COURT

1 SORAYA M. VEIGA, ESQ.
2 Nevada Bar No. 7944
3 7464 W. Sahara Avenue
4 Las Vegas, Nevada 89117
5 Telephone (702) 686-3371
6 veigalawoffice@cox.net
7 Unbundled Attorney for Defendant, Jennifer Elise Gordon

8 **DISTRICT COURT**
9 **FAMILY DIVISION**
10 **CLARK COUNTY, NEVADA**

11 MATTHEW ROBERT GEIGER
12 Plaintiff,
13 vs.
14 JENNIFER ELISE GORDON,
15 Defendant,

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

16 **NOTICE OF WITHDRAWAL OF ATTORNEY**

17 TO: CLERK OF THE COURT

18 COMES NOW, SORAYA M. VEIGA, ESQ., and submit the following Notice of
19 Withdrawal pursuant to EDRC 5.28 which states in pertinent part as follows:

20 An Attorney who contract with a client to limit the scope of representation shall
21 be permitted to withdraw from representation before the Court by filing a
22 Notice of Withdrawal with the clerk's office.

23 This office was retained to provide a limited service, per a limited services
24 agreement, which was both written and verbal between Defendant, Jennifer Elise
25 Gordon. This office is withdrawing from the case because our service was
26 completed. Defendant will be representing herself in proper person unless another
27 attorney agrees to represent the client.

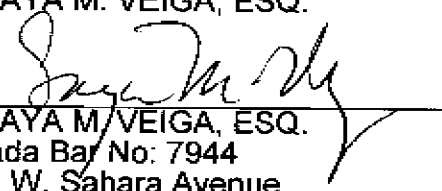
28 Defendant can be reached at the following address and telephone number

1 and can be served with notice of further proceeding taken in this case at:

2 91 Autumn Day St.
3 Henderson, Nevada 89012
4 (702) 234-9673

5 DATED this 29th day of May, 2013.

6 SORAYA M. VEIGA, ESQ.

7 By: 
8 SORAYA M. VEIGA, ESQ.
9 Nevada Bar No: 7944
10 7464 W. Sahara Avenue
11 Las Vegas, Nevada 89117
12 (702) 686-3371
13 Unbundled attorney for Defendant
14
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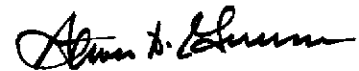
CERTIFICATE OF SERVICE

I hereby certify that I am an employee of SORAYA M. VEIGA, ESQ. and that
on the 29th day of May, 2013. I did email a true and correct copy of NOTICE
OF WITHDRAWAL OF ATTORNEY to:

Molly Rosenblum, Esq.
Family@halfpricelawyers.com

Jennifer Elise Gordon: email:
elise433@gmail.com


An Employee of SORAYA M. VEIGA, ESQ.



CLERK OF THE COURT

ORDR

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**

ORDER

This matter having come before the Court on the 7th day of May 2013 for Plaintiff's Motion for an emergency hearing, and related relief, and Defendant's Opposition and Countermotion, and Plaintiff MATTHEW ROBERT GEIGER, appearing with his counsel, CORINNE WURM, ESQ., *in an unbundled capacity*, and defendant JENNIFER ELISE GORDON, appearing with her counsel SORAYA VEIGA, ESQ., *in an unbundled capacity*, and the parties stipulated that father shall submit to drug testing (hair and urine) and mother will pay for said test. Counsel both agree that things need to be done in "baby steps". The Court noted that both parties attended and completed the UNLV Parenting program. The Court reported she read the psychological exam on father conducted by Dr. Harter. The Court advised that she thinks it is appropriate to start with therapeutic reunification for father with a mental health provider. The Court advised she is aware of the history of this case. The Court

RECEIVED

MAY 20 2013

FAMILY COURT
DEPARTMENT T

s:\family client files and forms\rosenblum law offices\clients\geiger, matthew (-46479)\divorce\pleadings\order.docx

provided Counsel with a copy of the Outsourced Provider List so that Counsel can agree on a Mental Health Provider. Having considered the papers and pleadings on file herein, the arguments of counsel, and the representations of the parties, the Court orders as follows:

IT IS HEREBY ORDERED that a letter shall be provided by the Mental Health Provider as to their recommendation as to further visits with the minor children and father.

IT IS FURTHER ORDERED that Father is to provide a copy of his 2012 tax returns to mother with W-2's and 1099, redacting all social security numbers and file as an exhibit, with a copy to Counsel.

IT IS FURTHER ORDERED that father shall provide a calculation of child support, as he had an affirmative duty to advise mother of his employment.

IT IS FURTHER ORDERED that Mother shall choose two (2) Mental Health Providers off of the list provided to counsel and father is to choose one (1) of the two to use by Friday 5/10/13 close of business. The therapist shall submit a letter to Chambers and Counsel once they feel father is ready for unsupervised visitation and the Court will place matter on calendar.

IT IS FURTHER ORDERED that everyday between 7:00 pm and 7:30 pm the children will be available for a phone call from father.

IT IS HEREBY STIPULATED AND AGREED, AND THEREFORE, IT IS FURTHER ORDERED that father can purchase the boys their own phones.

IT IS FURTHER ORDERED that Mother may continue to monitor the phone calls with father until the reunification starts.


1 IT IS FURTHER ORDERED that the parties shall appear for a status check regarding
2 drug test results on father and child support 5/21/13 at 11:00 am.

3 DATED this 22 day of May, 20 13.

4
5 
6 DISTRICT COURT JUDGE

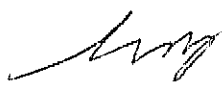
7 GAYLE NATHAN

8 Submitted by:
9 **ROSENBLUM LAW OFFICES**

10 
11 **MOLLY ROSENBLUM, ESQ.**
12 Nevada Bar No. 08242
13 330 E Charleston Blvd, Ste 100
14 Las Vegas, Nevada 89104-1034
15 (702) 400-0000
16 Email: family@halfpricelawyers.com
17 Attorney for Plaintiff
18 in an Unbundled Capacity

19 Approved as to form and content:

20 **Veiga & Yarmy, Chtd**

21 
22 STEVEN L. YARMY, ESQ.
23 for Bar No. 8733

24 **SORAYA VEIGA, ESQ.**
25 Nevada Bar No. 7944
26 2595 S. Torrey Pines Dr.
27 Las Vegas, NV 89146
28 (702) 586-3513
Attorney for Defendant
in an Unbundled Capacity



CLERK OF THE COURT

1 SORAYA M. VEIGA, ESQ.
2 Nevada Bar No. 7944
3 7464 W. Sahara Avenue
4 Las Vegas, Nevada 89117
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 **NOTICE OF WITHDRAWAL OF ATTORNEY**

14 TO: CLERK OF THE COURT

15 COMES NOW, SORAYA M. VEIGA, ESQ., and submit the following Notice of
16 Withdrawal pursuant to EDRC 5.28 which states in pertinent part as follows:

17 An Attorney who contract with a client to limit the scope of representation shall
18 be permitted to withdraw from representation before the Court by filing a
19 Notice of Withdrawal with the clerk's office.

20 This office was retained to provide a limited service, per a limited services
21 agreement, which was both written and verbal between Defendant, Jennifer Elise
22 Gordon. This office is withdrawing from the case because our service was
23 completed. Defendant will be representing herself in proper person unless another
24 attorney agrees to represent the client.

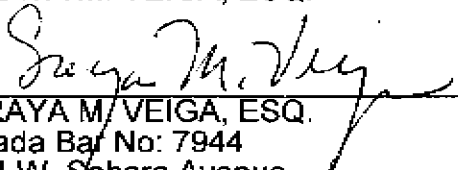
25 Defendant can be reached at the following address and telephone number
26
27
28

1 and can be served with notice of further proceeding taken in this case at:

2 91 Autumn Day St.
3 Henderson, Nevada 89012
4 (702) 234-9673

5 DATED this 5th day of June, 2013.

6 SORAYA M. VEIGA, ESQ.

7 By: 
8 SORAYA M. VEIGA, ESQ.
9 Nevada Bar No: 7944
10 7464 W. Sahara Avenue
11 Las Vegas, Nevada 89117
12 (702) 686-3371
13 Unbundled attorney for Defendant
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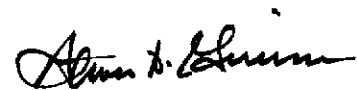
1
2
3 **CERTIFICATE OF SERVICE**

4 I hereby certify that I am an employee of SORAYA M. VEIGA, ESQ. and that
5 on the 5th day of June, 2013. I did email a true and correct copy of NOTICE
6 OF WITHDRAWAL OF ATTORNEY to:

7 Molly Rosenblum, Esq.
8 Via email: molly@halfpricelawyers.com

9 Jennifer Elise Gordon: email:
10 elise433@gmail.com

11 
12 An Employee of SORAYA M. VEIGA, ESQ.
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CLERK OF THE COURT

1 **NEOJ**
2 **MOLLY ROSENBLUM, ESQ.**
Nevada Bar No. 08242
3 **CORINNE WURM, ESQ.**
Nevada Bar No. 12141
4 **ROSENBLUM LAW OFFICES**
330 E Charleston Blvd. Ste 100
Las Vegas, Nevada 89104-1034
(702) 400-0000
5 Email: family@halfpricelawyers.com
Attorney for Plaintiff
6 in an Unbundled Capacity

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

9 **MATTHEW ROBERT GEIGER,**

10 Plaintiff,

11 vs.

12 **JENNIFER ELISE GORDON,**

13 Defendant

Case No.: **D-10-430639-D**
Dept. No.: **T**

14
15 **NOTICE OF ENTRY OF ORDER**

16 Please take notice that an order, attached hereto, was entered in the above-entitled
17 action on the **29th** day of **May**, 2013.

18
19 DATED this 7 day of June, 2013.

20 Submitted by:
21 **ROSENBLUM LAW OFFICES**

22 */s/ Molly Rosenblum, Esq.*

23
24 **MOLLY ROSENBLUM, ESQ.**
Nevada Bar No. 08242
25 330 E Charleston Blvd. Ste 100
Las Vegas, Nevada 89104-1034
26 (702) 400-0000
Email: family@halfpricelawyers.com
27 Attorney for Plaintiff
28 in an Unbundled Capacity

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Dept. No.: T

243

1 provided Counsel with a copy of the Outsourced Provider List so that Counsel can agree on a
2 Mental Health Provider. Having considered the papers and pleadings on file herein, the
3 arguments of counsel, and the representations of the parties, the Court orders as follows:

4 IT IS HEREBY ORDERED that a letter shall be provided by the Mental Health
5 Provider as to their recommendation as to further visits with the minor children and father.

6 IT IS FURTHER ORDERED that Father is to provide a copy of his 2012 tax returns
7 to mother with W-2's and 1099, redacting all social security numbers and file as an exhibit,
8 with a copy to Counsel.

9 IT IS FURTHER ORDERED that father shall provide a calculation of child support,
10 as he had an affirmative duty to advise mother of his employment.

11 IT IS FURTHER ORDERED that Mother shall choose two (2) Mental Health
12 Providers off of the list provided to counsel and father is to choose one (1) of the two to use
13 by Friday 5/10/13 close of business. The therapist shall submit a letter to Chambers and
14 Counsel once they feel father is ready for unsupervised visitation and the Court will place
15 matter on calendar.

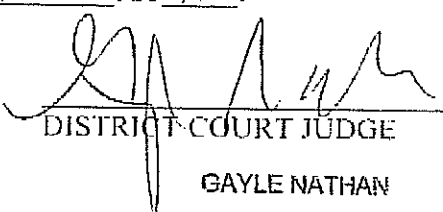
16 IT IS FURTHER ORDERED that everyday between 7:00 pm and 7:30 pm the
17 children will be available for a phone call from father.

18 IT IS HEREBY STIPULATED AND AGREED, AND THEREFORE, IT IS
19 FURTEHR ORDERED that father can purchase the boys their own phones.

20 IT IS FURTHER ORDERED that Mother may continue to monitor the phone calls
21 with father until the reunification starts.

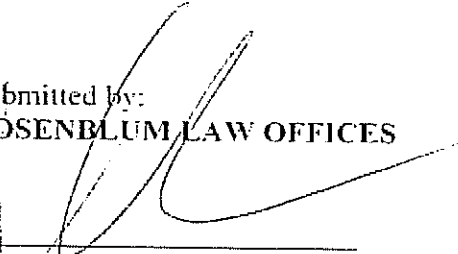
1 IT IS FURTHER ORDERED that the parties shall appear for a status check regarding
2 drug test results on father and child support 5/21/13 at 11:00 am.

3 DATED this 22 day of May, 20 13.

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6 
DISTRICT COURT JUDGE

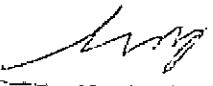
GAYLE NATHAN

7
8 Submitted by:
9 **ROSENBLUM LAW OFFICES**

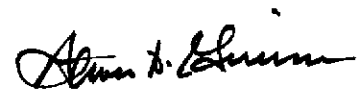
10
11 
12 **MOLLY ROSENBLUM, ESQ.**
13 Nevada Bar No. 08242
14 330 E Charleston Blvd. Ste 100
15 Las Vegas, Nevada 89104-1034
16 (702) 400-0000
17 Email: family@halfpricelawyers.com
18 Attorney for Plaintiff
19 in an Unbundled Capacity

20 Approved as to form and content:

21 **Veiga & Yarmy, Chtd**

22
23 
24 STEVEN L. YARMY, ESQ.
25 Bar No. 8733

26
27 **SORAYA VEIGA, ESQ.**
28 Nevada Bar No. 7944
2595 S. Torrey Pines Dr.
Las Vegas, NV 89146
(702) 586-3513
Attorney for Defendant
in an Unbundled Capacity



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

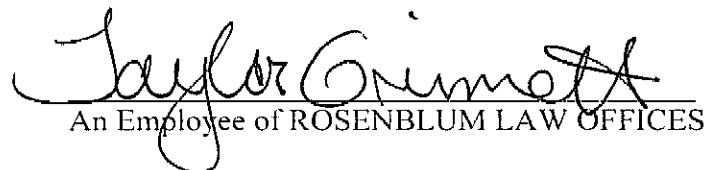
I hereby certify that service of the foregoing document:

1. Notice of Entry of Order

was made this 17 day of June, 2013, by depositing a copy of the same in
the U.S. Mails at Las Vegas, Nevada, postage prepaid, addressed to:

Matthew Geiger
8659 Horizon Wind Avenue Unit 102
Las Vegas, NV 89178-8733
Plaintiff in Proper Person

Jennifer Gordon
5133 Teal Petals Street
North Las Vegas, NV 89081
Defendant in Proper Person



An Employee of ROSENBLUM LAW OFFICES

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

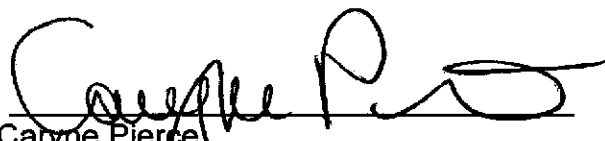
TO: Molly Rosenblum, Esq.

Please be advised that the above-entitled matter has been scheduled for **Order to Show Cause Re: Income Tax Information for Matters Taken Under Advisement** to be heard by the Honorable Gayle Nathan at the Family Courts and Services Center, 601 N. Pecos Rd., Las Vegas, Nevada, on the **20th day of August, 2013** at the hour of **10:00 AM** in **Department T**.

The minutes from the 05/21/13 hearing are enclosed for your convenience. The above referenced Order to Show Cause Hearing will be vacated upon receipt, by this Court, of the Income Tax Information Ordered by Judge Nathan at said hearing.

YOUR PRESENCE IS NECESSARY.

HONORABLE GAYLE NATHAN

By: 
Caryne Pierce
Judicial Executive Assistant

GAYLE NATHAN
DISTRICT JUDGE

FAMILY DIVISION, DEPT. T
LAS VEGAS, NV 89101-2408

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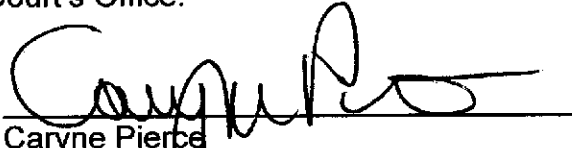
I hereby certify that on the above file stamped date:

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

Molly Rosenblum, Esq.
330 E. Charleston Blvd., Suite 100
Las Vegas, NV. 89104

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

Molly Rosenblum, Esq.


Caryne Pierce
Judicial Executive Assistant
Department V

GAYLE NATHAN
DISTRICT JUDGE

FAMILY DIVISION, DEPT. T
LAS VEGAS, NV 89101-2408

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****May 21, 2013**

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

May 21, 2013 11:00 AM Return Hearing

HEARD BY: Nathan, Gayle**COURTROOM:** Courtroom 14**COURT CLERK:** Lucinda Tait

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

JOURNAL ENTRIES

- RETURN HEARING RE: FATHER'S DRUG TEST RESULTS AND CHILD SUPPORT

Attorney Molly Rosenblum appeared with father in an UNBUNDLED capacity and Attorney Soraya Veiga appeared with mother in an UNBUNDLED capacity.

Discussion regarding father's drug test results showing positive for Methadone and THC. Counsel provided father's prescriptions to court as well.

Ms. Rosenblum advised father has submitted his tax information and it should be completed today.

Argument by Attorney Veiga.

COURT ORDERED:

Attorney Rosenblum to submit father's tax information to Chambers for an in camera review and

PRINT DATE:	05/28/2013	Page 1 of 2	Minutes Date:	May 21, 2013
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D-10-430639-D

Judge Nathan will issue a MINUTE ORDER regarding the 2012 tax return.

Court is requesting an AUDIT from DAFS re: case R-13-176576-R which brings calculations through 4/30/13 and Judge will review the last order for support and arrearages and MODIFY.

****A copy of this MINUTE ORDER was forwarded to DAFS regarding the Court's request by court clerk/**ct**

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	05/28/2013	Page 2 of 2	Minutes Date:	May 21, 2013
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**DISTRICT COURT—FAMILY DIVISION
CLARK COUNTY, NEVADA**

Defendant

**MOTION TO WITHDRAW AS
PLAINTIOFF'S COUNSEL**

TO: Defendant, Jennifer Elise Gordon and Soraya Veiga, Esq., Defendant's counsel of record.

This Motion is made and based upon all of the papers and pleadings on file herein, the following Memorandum of Points and Authorities, the Affidavit of MOLLY ROSENBLUM, ESQ., submitted herewith, and any argument which may be adduced at the time of hearing.

1 DATED this 6th day of August, 2013.

2
3 ROSENBLUM LAW OFFICES

4
5 By: MOLLY ROSENBLUM, ESQ.
6 Nevada Bar No. 8242
7 1701 W. Charleston Blvd., Suite 600
8 Las Vegas, Nevada 89102
9 Attorneys for Plaintiff
In an Unbundled Capacity

10 **NOTICE OF MOTION**

11 TO: ALL INTERESTED PARTIES

12 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned
13 will bring the above and foregoing Motion to Withdraw as Attorney of Record on for hearing
14 before the above entitled Court on the 17th day of September, 202013
15 at 10:00 a.m., in Department T.

16
17 DATED this 6th day of August, 2013.

18 ROSENBLUM LAW OFFICES

19
20 MOLLY S. ROSENBLUM, ESQ.
21 Nevada Bar No. 8242
22 1701 W. Charleston Blvd., Suite 600
23 Las Vegas, Nevada 89102
24 Attorney for Plaintiff
25 *In an unbundled capacity*
26
27
28

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **STATEMENT OF FACTS**

4
5 The Plaintiff, MATTHEW GEIGER (hereinafter, "Matthew"), retained MOLLY S.
6 ROSENBLUM, ESQ. of ROSENBLUM LAW OFFICES ("Counsel") in an unbundled
7 capacity for representation at two hearings. At the time of the last hearing, Plaintiff was
8 instructed to provide his tax returns to the Court for an *in camera* review of the same.
9

10 Since the last hearing, multiple attempts have been made to contact Plaintiff relative to
11 the tax returns. Telephone calls were made on June 3, 2013, June 14, 2013, June 28, 2013,
12 July 3, 2013, July 12, 2013 and August 2, 2013 requesting the tax returns. Correspondence
13 was also sent to Plaintiff reminding him of the tax return obligation.
14

15 To date, counsel has received no response from plaintiff nor has plaintiff provided a
16 copy of his tax returns to counsel. As such, counsel can only conclude that the attorney-client
17 relationship has been strained due differing opinions between Counsel and Matthew, and now
18 has completely deteriorated beyond repair. As such, Counsel has no choice but to file the
19 instant motion.
20

21 **II.**

22 **LEGAL ANALYSIS**

23 Pursuant to Supreme Court Rule ("SCR") 46, an attorney may withdraw from an
24 action upon application and subsequent order of the Court unless there is a final judgment at
25 which time an attorney may simply file a withdrawal without client consent. Additionally,
26 Eighth Judicial District Court Rule ("EDCR") 7.40 states in pertinent part:
27

28 (b) Counsel in any case may be changed only:

1 (1) When a new attorney is to be substituted in place of the attorney
2 withdrawing, by the written consent of both attorneys and the client, which must be
3 filed with the court and served upon all parties or their attorneys who have appeared in the
4 action, or

5 (2) When no attorney has been retained to replace the attorney withdrawing,
6 by order of the court, granted upon written motion, and

7 (i) If the application is made by the attorney, the attorney must include in an
8 affidavit the address, or last known address, at which the client may be served with notice of
9 further proceedings taken in the case in the event the application for withdrawal is granted,
10 and the telephone number, or last known telephone number, at which the client may be
11 reached and the attorney must serve a copy of the application upon the client and all other
12 parties to the action or their attorneys.

13 Moreover, rule 1.16 (formerly SCR 165) states in pertinent part:

14 (b) Except as stated in paragraph (c), a lawyer may withdraw from representing a
15 client if:

16 (1) Withdrawal can be accomplished without material adverse effect on the interests
17 of the client;

18 (2) The client persists in a course of action involving the lawyer's services that the
19 lawyer reasonably believes is criminal or fraudulent;

20 (3) The client has used the lawyer's services to perpetrate a crime or fraud;

21 (4) A client insists upon taking action that the lawyer considers repugnant or with
22 which the lawyer has fundamental disagreement;

23 (5) The client fails substantially to fulfill an obligation to the lawyer regarding the
24 lawyer's services and has been given reasonable warning that the lawyer will withdraw unless
25 the obligation is fulfilled;

26 (6) The representation will result in an unreasonable financial burden on the lawyer or
27 has been rendered unreasonably difficult by the client; or

28 (7) Other good cause for withdrawal exists.

As stated above, multiple attempts were made to obtain the ordered information from
plaintiff. Plaintiff has failed to respond to any communication from counsel and failed to
provide the ordered information. As a result, the relationship between Counsel and
Matthew has deteriorated beyond repair making the continuation of representation impossible.

Therefore, because withdrawal can be accomplished without a material adverse effect
on Matthew's interest, and a fundamental disagreement exists between Counsel and Matthew,
Counsel respectfully requests the Court to allow the firm to withdraw as Counsel of record.

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III.

CONCLUSION

WHEREFORE, based upon the foregoing, counsel respectfully requests this Court enter Orders granting the following relief:

1. Allowing Counsel for Plaintiff to withdraw as attorney of record.

DATED this 6th day of August, 2013.

ROSENBLUM LAW OFFICES

MOLLY S. ROSENBLUM, ESQ.
Nevada Bar No. 8242
1701 W. Charleston Blvd., Suite 600
Las Vegas, Nevada 89102
Attorney for Plaintiff
In an unbundled capacity

AFFIDAVIT OF MOLLY ROSENBLUM, ESQ.

STATE OF NEVADA)
) SS:
COUNTY OF CLARK)

I, MOLLY ROSENBLUM, Esq., swear, under the laws of the State of Nevada as follows:

1. I am an attorney duly licensed before all Courts in the State of Nevada. I make statements contained in this affidavit of my own firsthand knowledge unless stated upon information and belief, as to those statements, I believe them to be true.
2. The Plaintiff, Matthew Geiger, retained Rosenblum Law Offices, in an unbundled capacity to appear at two hearings. That at the last hearing, plaintiff was ordered to submit his tax returns to counsel and counsel was to provide the same to the Court. That counsel has attempted numerous times to obtain the information from plaintiff to no avail.
3. Pursuant to EDCR 7.40, Matthew's last known address and telephone number for service is as follows:

Matthew Geiger, 8659 Horizon Wind Avenue #102, Las Vegas NV 89178
(702) 449-3506

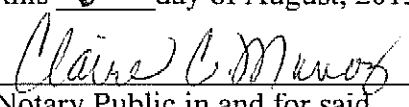
4. For the foregoing reasons, the undersigned requests an Order of Withdrawal.

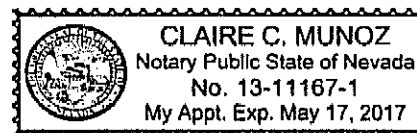
DATED this 6th day of August, 2013.


MOLLY ROSENBLUM, ESQ.

SUBSCRIBED AND SWORN TO before me

this 6th day of August, 2013.


Notary Public in and for said
County and State



1 **MOFI**
2 **MOLLY ROSENBLUM, ESQ.**
3 Nevada Bar No. 08242
4 **ROSENBLUM LAW OFFICES**
5 1701 W. Charleston Blvd. Ste 600
6 Las Vegas, Nevada 89102
7 (702) 433-2889
8 Email: staff@rosenblumlawlv.com
9 Attorney for Plaintiff
10 in an Unbundled Capacity

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

9 MATTHEW ROBERT GEIGER,

CASE NO D-10-430639-D

10 Plaintiff

DEPT. NO T

-vs-

12 JENNIFER ELISE GORDON.,

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

13 Defendant

14 Party Filing Motion/Opposition: ☒ Plaintiff/Petitioner ☐ Defendant/Respondent

15 MOTION TO ALLOW PLAINTIFFS COUNSEL TO WITHDRAW

16 **Motions and**
17 **Oppositions to Motions**
18 **filed after entry of a final**
19 **order pursuant to NRS**
20 **125, 125B or 125C are**
21 **subject to the Re-open**
22 **filing fee of \$25.00,**
23 **unless specifically**
24 **excluded. (NRS 19.0312)**

22 **NOTICE:**

23 *If it is determined that a motion or*
24 *opposition is filed without payment*
25 *of the appropriate fee, the matter*
26 *may be taken off the Court's*
27 *calendar or may remain undecided*
28 *until payment is made.*

16 **Mark correct answer with an "X."**

- 17 1. No final Decree or Custody Order has been
18 entered. ☒ YES ☐ NO
19 2. This document is filed solely to adjust the amount of
20 support for a child. No other request is made.
21 ☐ YES ☒ NO
22 3. This motion is made for reconsideration or a new
23 trial and is filed within 10 days of the Judge's Order
24 If YES, provide file date of Order: _____
25 ☐ YES ☒ NO

26 If you answered YES to any of the questions above,
27 you are not subject to the \$25 fee.

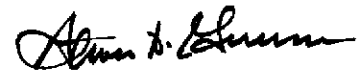
26 Motion/Opposition ☐ IS ☒ IS NOT subject to \$25 filing fee

27 Dated this 8th Day of August 2013

28 Claire Munoz

Printed Name of Preparer


Signature of Preparer



CLERK OF THE COURT

NOH

MOLLY ROSENBLUM, ESQ.

Nevada Bar No. 08242

ROSENBLUM LAW OFFICES

1701 W Charleston Blvd, Ste 600

Las Vegas, NV 89102-2343

(702) 433-2889—Phone

(702) 425-9642—Fax

Email: staff@rosenblumlawlv.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**

Date of Hearing: **09/17/2013**

Time of Hearing: **10:00am**

NOTICE OF HEARING

TO: JENNIFER GORDON, Defendant;

NOTICE IS HEREBY GIVEN that a hearing on:

Motion To Withdraw As Plaintiff's Counsel,

and related matters is scheduled in the above referenced court on September 17, 2013 at

10:00 a.m.

///

///

///

1 DATED this 14 day of August, 2013.

2 Submitted By:
3 ROSENBLUM LAW OFFICES

4 /s/ Molly Rosenblum, Esq.

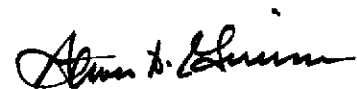
5
6 **MOLLY S. ROSENBLUM, ESQ.**
7 Nevada Bar # 008242
8 1701 W Charleston Blvd, Ste 600
9 Las Vegas, NV 89102-2343
10 (702) 433-2889—Phone
11 (702) 425-9642—Fax
12 Email: staff@rosenblumlawlv.com
13 Attorney for Plaintiff
14 in an Unbundled Capacity

15 CERTIFICATE OF MAILING

16 I hereby certify that service of the foregoing document was made this 14 day of
17 August, 2013, by depositing a copy of the same in the U.S. Mails at Las Vegas,
18 Nevada, postage prepaid, addressed to:

19 Jennifer Gordon
20 91 Autumn Day St.
21 Henderson, NV 89012
22 *Defendant in Proper Person*

23 
24 An Employee of ROSENBLUM LAW OFFICES



CLERK OF THE COURT

CERT

MOLLY ROSENBLUM, ESQ.

Nevada Bar No. 08242

ROSENBLUM LAW OFFICES

1701 W Charleston Blvd, Ste 600

Las Vegas, NV 89102-2343

(702) 433-2889—Phone

(702) 425-9642—Fax

Email: staff@rosenblumlawlv.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**

Date of Hearing: 09/17/2013

Time of Hearing: 10:00 a.m.

CERTIFICATE OF MAILING

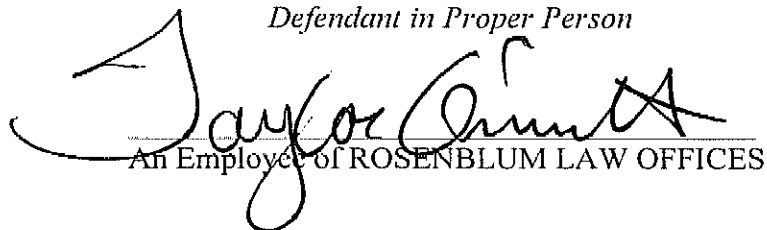
I hereby certify that service of the foregoing document:

1. Notice of Hearing
2. Motion To Withdraw As Plaintiff's Counsel

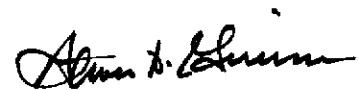
was made this 14 day of AUGUST, 2013, by depositing a copy of the same in
the U.S. Mails at Las Vegas, Nevada, postage prepaid, addressed to:

Matthew Geiger
8659 Horizon Wind Ave. Apt 102
Las Vegas, NV 89178
Plaintiff

Jennifer Gordon
91 Autumn Day St.
Henderson, NV 89012
Defendant in Proper Person



An Employee of ROSENBLUM LAW OFFICES



CLERK OF THE COURT

1 SUPP

2 ROSENBLUM LAW OFFICES

3 MOLLY S. ROSENBLUM, ESQ.

4 Nevada Bar No. 8242

5 1701 W. Charleston Blvd., Suite 600

6 Las Vegas, Nevada 89102

Telephone: 702-433-2889

E-Mail: staff@rosenblumlawlv.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

SUPPLEMENT TO PLAINTIFF'S PLEADINGS

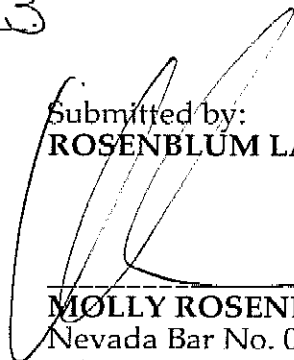
COMES NOW, Plaintiff MATTHEW GEIGER, by and through her counsel, Molly Rosenblum, Esq., in an "unbundled capacity," and now files this supplement to her prior pleadings to include the following exhibits:

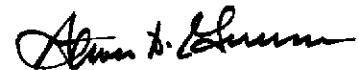
Exhibit 1: Tax Return

1 The aforementioned documents are submitted *in camera* for the Court's review as
2 they contain private tax information.

3 DATED this 14 day of Aug, 2013

Submitted by:
ROSENBLUM LAW OFFICES


MOLLY ROSENBLUM, ESQ.
Nevada Bar No. 08242
ROSENBLUM LAW OFFICES
1701 W Charleston Blvd, Ste 600
Las Vegas, Nevada 89102
(702) 433-2889
Attorney for Plaintiff, Unbundled



CLERK OF THE COURT

CERT
MOLLY ROSENBLUM, ESQ.
Nevada Bar No. 08242
ROSENBLUM LAW OFFICES
1701 W. Charleston Blvd., Ste. 600
Las Vegas, Nevada 89102
(702) 433-2889
Email: staff@rosenblumlawlv.com
Attorney for Plaintiff
in an Unbundled Capacity

DISTRICT COURT—FAMILY DIVISION
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,

Plaintiff,

vs.

JENNIFER ELISE GORDON,

Defendant

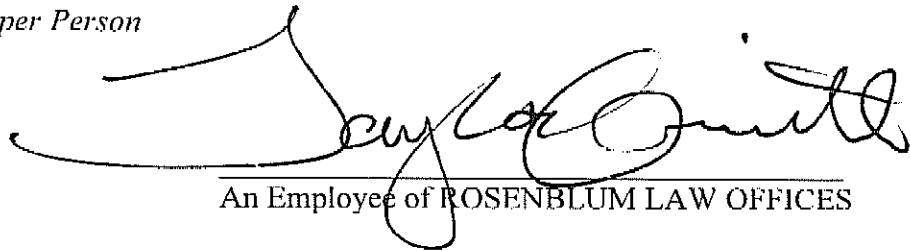
Case No.: **D-13-481732-F**
Dept. No.: **M**

CERTIFICATE OF MAILING

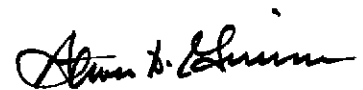
I hereby certify that service of the foregoing document:

1. Supplement To Plaintiff's Pleadings
was made this 15 day of August, 2013, by depositing a copy of the same in
the U.S. Mails at Las Vegas, Nevada, postage prepaid, addressed to:

Jennifer Gordon
91 Autumn Day St.
Henderson, NV 89012
Defendant in Proper Person



An Employee of ROSENBLUM LAW OFFICES



CLERK OF THE COURT

ORDR

DISTRICT COURT
CLARK COUNTY, NEVADA

Matthew Robert Geiger, Plaintiff.

CASE NO.: D-10-430687-D

DEPT NO.: T

vs.

Jennifer Elise Gordon, Defendant.

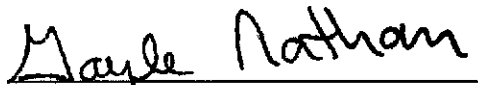
MINUTE ORDER

TO: ANY AND ALL INTERESTED PARTIES

YOU WILL PLEASE TAKE NOTICE that review of the court file indicates that a Minute Order was drafted by the Court on September 03, 2013. Neither party appeared nor were their Counsel present and the Court Ordered the minutes shall SUFFICE. Therefore, this Court will prepare said paperwork as follows:

IT IS HEREBY ORDERED that the attached copy of the Minute Order is hereby incorporated herein and will become the Order of this case.

DATED this 10th day of September, 2013.



GAYLE NATHAN
DISTRICT JUDGE, DEPT T

Prepared by the Court

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

September 03, 2013

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

September 03, 9:30 AM Minute Order
2013

HEARD BY: Nathan, Gayle

COURTROOM: Courtroom 14

COURT CLERK: Lucinda Tait

PARTIES:

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

JOURNAL ENTRIES

- MINUTE ORDER RE: CHILD SUPPORT OBLIGATION

This Court having taken under advisement the Defendant's request for a review of Plaintiff's child support obligation; the Court having ORDERED that the Plaintiff had an affirmative duty to notify the Defendant when he was employed; the Court makes the following FINDINGS and ORDER:

The Court having reviewed the Plaintiff's 2012 tax returns FINDS that the Plaintiff failed to notify Defendant of his employment; The Plaintiff, by the Order from the May 7, 2013 hearing, was to have his child support adjusted upon his employment.

Therefore, the Court FINDS that the Plaintiff's income in 2012 amounted to \$4985 per month; his child support for two children is therefore \$1246 per month (Defendant has primary custody and the PMI for one child is \$714 therefore there is no reduction forthcoming.)

For the 12 months of 2012 the Plaintiff's child support obligation totaled \$14,952;

PRINT DATE:	09/03/2013	Page 1 of 2	Minutes Date:	September 03, 2013
-------------	------------	-------------	---------------	--------------------

For the 9 months thus far for 2013 the Plaintiff's child support obligation totals \$ 11,214;
Child Support Enforcement shall apply any credits for payments Plaintiff has made in 2012 and 2013
against these sums.

Statutory interest and penalties shall accrue pursuant to statute.

Plaintiff shall make a payment of \$100 on the arrears and child support of \$1246 shall be set as the
new child support.

Absent a stipulation between the parties there shall be no modification to this Order without a
petition for same to Department T.

IT IS SO ORDERED.

****** A copy of this MINUTE ORDER was forwarded to DAFS regarding their case number R-13-176576-
R. A copy of this MINUTE ORDER was also forwarded to the parties at their last known addresses
as listed in Odyssey by court clerk/****ct**

INTERIM CONDITIONS:

FUTURE HEARINGS: September 17, 2013 10:00 AM Motion
 Nathan, Gayle
 Courtroom 14
 Tait, Lucinda

PRINT DATE:	09/03/2013	Page 2 of 2	Minutes Date:	September 03, 2013
-------------	------------	-------------	---------------	--------------------


CLERK OF THE COURT

ORDER

MOLLY ROSENBLUM, ESQ.

Nevada Bar No. 08242

ROSENBLUM LAW OFFICES

1701 W Charleston Blvd, Ste 600

Las Vegas, NV 89102-2343

(702) 433-2889—Phone

(702) 425-9642—Fax

Email: staff@rosenblumlawlv.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**

Date of Hearing: 09/17/2013

Time of Hearing: 10:00 a.m.

ORDER TO VACATE HEARING

A "Motion to Withdraw as Attorney" has been set to be heard before this court in the above referenced case on September 17, 2013 at 10:00am.

MOLLY ROSENBLUM, ESQ. of the Law Firm, ROSENBLUM LAW OFFICES, PC., was retained by Plaintiff MATTHEW ROBERT GEIGER, in an "unbundled capacity," and pursuant to E.D.C.R. 5.28(b). ROSENBLUM LAW OFFICES may file a "Notice of Withdrawal" from the case when services are completed. As services have been completed, Attorney Molly Rosenblum respectfully requests this court to vacate said hearing and allow for withdrawal by Notice.

///

///

///

Non-Trial Dispositions:

- | | |
|--|--|
| <input type="checkbox"/> Other | <input type="checkbox"/> Settled/Withdrawn: |
| <input type="checkbox"/> Dismissed - Want of Prosecution | <input type="checkbox"/> Without Judicial Conf/Hrg |
| <input type="checkbox"/> Involuntary (Statutory) Dismissal | <input checked="" type="checkbox"/> With Judicial Conf/Hrg |
| <input type="checkbox"/> Default Judgment | <input type="checkbox"/> By ADR |
| <input type="checkbox"/> Transferred | |
| <u>Trial Dispositions:</u> | |
| <input type="checkbox"/> Disposed After Trial Start | <input type="checkbox"/> Judgment Reached by Trial |

1

RECEIVED

SEP 12 2013

**FAMILY COURT
DEPARTMENT T**

IT IS HEREBY ORDERED that the Hearing on Attorney Molly Rosenblum's Motion to Withdraw set for September 17th, 2013 at 10:00am is vacated.

IT IS FURTHER ORDERED that Attorney Molly Rosenblum will file a Notice of Withdrawal of Attorney pursuant to E.D.C.R. 5.28(b).

DATED this 16th day of September, 2013.

DISTRICT COURT JUDGE
GAYLE NATHAN

Submitted by
ROSENBLUM LAW OFFICES

MOLLY ROSENBLUM, ESQ.
Nevada Bar No. 08242
1701 W Charleston Blvd, Ste 600
Las Vegas, NV 89102-2343
(702) 433-2889—Phone
(702) 425-9642—Fax
Email: staff@rosenblumlawlv.com
Attorney for Plaintiff
in an Unbundled Capacity

1 NEO

2 DISTRICT COURT
3 FAMILY DIVISION
4 CLARK COUNTY, NEVADA


CLERK OF THE COURT

5 ****

6 Matthew Robert Geiger, Plaintiff.

CASE NO.: D-10-430039-D

DEPT NO.: T

7 vs.

8 Jennifer Elise Gordon, Defendant.

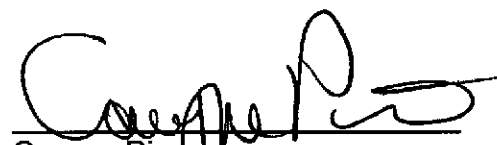
9 **NOTICE OF ENTRY OF MINUTE ORDER**

10 **TO: ALL PARTIES AND/OR THEIR ATTORNEYS**

11
12 Please take note that after a review of the court file, a Minute Order was
13 prepared by the Court. A copy of the Minute Order is attached hereto. I hereby certify
14 that I caused on the above file stamped date, a copy of the attached **MINUTE ORDER**
15 to be mailed postage prepaid to the following person or persons at their last known
16 address:

17 Matthew Geiger
18 8659 Horizon Wind Ave., Unit 102
Las Vegas, NV. 89178-8733

19 Jennifer Gordon
20 91 Autumn Day St.
Henderson, NV. 89012


Caryne Pierce
Judicial Assistant, Department T


CLERK OF THE COURT

1 ORDR
2
3
4

DISTRICT COURT
CLARK COUNTY, NEVADA

7 Matthew Robert Geiger, Plaintiff.
8
9

CASE NO.: D-10-430637-D
DEPT NO.: T

vs.

10 Jennifer Elise Gordon, Defendant.
11

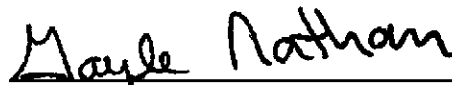
MINUTE ORDER

13 TO: ANY AND ALL INTERESTED PARTIES

14 YOU WILL PLEASE TAKE NOTICE that review of the court file indicates that a
15 Minute Order was drafted by the Court on September 03, 2013. Neither party
16 appeared nor were their Counsel present and the Court Ordered the minutes shall
17 SUFFICE. Therefore, this Court will prepare said paperwork as follows:
18

19 IT IS HEREBY ORDERED that the attached copy of the Minute Order is hereby
20 incorporated herein and will become the Order of this case.

21 DATED this 10th day of September, 2013.
22

23 
24 GAYLE NATHAN
25 DISTRICT JUDGE, DEPT T

26 Prepared by the Court
27
28

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

September 03, 2013

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

September 03, 9:30 AM Minute Order
2013

HEARD BY: Nathan, Gayle

COURTROOM: Courtroom 14

COURT CLERK: Lucinda Tait

PARTIES:

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

JOURNAL ENTRIES

- MINUTE ORDER RE: CHILD SUPPORT OBLIGATION

This Court having taken under advisement the Defendant's request for a review of Plaintiff's child support obligation; the Court having ORDERED that the Plaintiff had an affirmative duty to notify the Defendant when he was employed; the Court makes the following FINDINGS and ORDER:

The Court having reviewed the Plaintiff's 2012 tax returns FINDS that the Plaintiff failed to notify Defendant of his employment; The Plaintiff, by the Order from the May 7, 2013 hearing, was to have his child support adjusted upon his employment.

Therefore, the Court FINDS that the Plaintiff's income in 2012 amounted to \$4985 per month; his child support for two children is therefore \$1246 per month (Defendant has primary custody and the PMI for one child is \$714 therefore there is no reduction forthcoming.)

For the 12 months of 2012 the Plaintiff's child support obligation totaled \$14,952;

PRINT DATE:	09/03/2013	Page 1 of 2	Minutes Date:	September 03, 2013
-------------	------------	-------------	---------------	--------------------

For the 9 months thus far for 2013 the Plaintiff's child support obligation totals \$ 11,214;
Child Support Enforcement shall apply any credits for payments Plaintiff has made in 2012 and 2013
against these sums.

Statutory interest and penalties shall accrue pursuant to statute.

Plaintiff shall make a payment of \$100 on the arrears and child support of \$1246 shall be set as the
new child support.

Absent a stipulation between the parties there shall be no modification to this Order without a
petition for same to Department T.

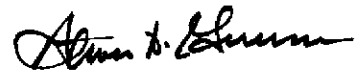
IT IS SO ORDERED.

****A copy of this MINUTE ORDER was forwarded to DAFS regarding their case number R-13-176576-
R. A copy of this MINUTE ORDER was also forwarded to the parties at their last known addresses
as listed in Odyssey by court clerk/**ct**

INTERIM CONDITIONS:

FUTURE HEARINGS: September 17, 2013 10:00 AM Motion
 Nathan, Gayle
 Courtroom 14
 Tait, Lucinda

PRINT DATE:	09/03/2013	Page 2 of 2	Minutes Date:	September 03, 2013
-------------	------------	-------------	---------------	--------------------



CLERK OF THE COURT

NEO
MOLLY ROSENBLUM, ESQ.
Nevada Bar No. 08242
ROSENBLUM LAW OFFICES
1701 W. Charleston Blvd., Ste. 600
Las Vegas, Nevada 89102
(702) 433-2889 Phone
(702) 425-9642 Fax
Email: staff@rosenblumlawlv.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 ENTRY OF ORDER

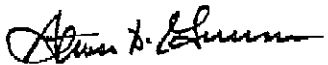
Please take notice that an order, attached hereto, was entered in the above-entitled
action on the 17th of September, 2013.

DATED this 9th day of October, 2013.

Submitted by:
ROSENBLUM LAW OFFICES

/s/ Molly Rosenblum, Esq.

MOLLY ROSENBLUM, ESQ.
Nevada Bar No. 08242
1701 W. Charleston Blvd., Ste. 600
Las Vegas, Nevada 89102
(702) 433-2889
Email: staff@rosenblumlawlv.com
Attorney for Defendant
in an Unbundled Capacity



CLERK OF THE COURT

ORDR
MOLLY ROSENBLUM, ESQ.
Nevada Bar No. 08242
ROSENBLUM LAW OFFICES
1701 W Charleston Blvd, Ste 600
Las Vegas, NV 89102-2343
(702) 433-2889—Phone
(702) 425-9642—Fax
Email: staff@rosenblumlawlv.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**

Date of Hearing: 09/17/2013
Time of Hearing: 10:00 a.m.

ORDER TO VACATE HEARING

A "Motion to Withdrawal as Attorney" has been set to be heard before this court in the above referenced case on September 17, 2013 at 10:00am.

MOLLY ROSENBLUM, ESQ. of the Law Firm, ROSENBLUM LAW OFFICES, PC., was retained by Plaintiff MATTHEW ROBERT GEIGER, in an "unbundled capacity," and pursuant to E.D.C.R. 5.28(b). ROSENBLUM LAW OFFICES may file a "Notice of Withdrawal" from the case when services are completed. As services have been completed, Attorney Molly Rosenblum respectfully requests this court to vacate said hearing and allow for withdrawal by Notice.

///

///

///

Non-Trial Dispositions:

- | | |
|--|--|
| <input type="checkbox"/> Other | <input type="checkbox"/> Settled/Withdrawn: |
| <input type="checkbox"/> Dismissed - Want of Prosecution | <input type="checkbox"/> Without Judicial Conf/Hrg |
| <input type="checkbox"/> Involuntary (Statutory) Dismissal | <input checked="" type="checkbox"/> With Judicial Conf/Hrg |
| <input type="checkbox"/> Default Judgment | <input type="checkbox"/> By ADR |
| <input type="checkbox"/> Transferred | |
| <input type="checkbox"/> Disposed After Trial Start | <input type="checkbox"/> Judgment Reached by Trial |

1

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RECEIVED

SEP 12 2013

**FAMILY COURT
DEPARTMENT T**

IT IS HEREBY ORDERED that the Hearing on Attorney Molly Rosenblum's Motion to Withdraw set for September 17th, 2013 at 10:00am is vacated.

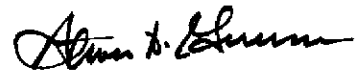
IT IS FURTHER ORDERED that Attorney Molly Rosenblum will file a Notice of Withdrawal of Attorney pursuant to E.D.C.R. 5.28(b).

DATED this 16 day of June, 2013.

DISTRICT COURT JUDGE
GAYLE NATHAN

Submitted by:
ROSENBLUM LAW OFFICES

MOLLY ROSENBLUM, ESQ.
Nevada Bar No. 08242
1701 W Charleston Blvd, Ste 600
Las Vegas, NV 89102-2343
(702) 433-2889—Phone
(702) 425-9642—Fax
Email: staff@rosenblumlawlv.com
Attorney for Plaintiff
in an Unbundled Capacity



CLERK OF THE COURT

CERT

MOLLY ROSENBLUM, ESQ.

Nevada Bar No. 08242

ROSENBLUM LAW OFFICES

1701 W Charleston Blvd, Ste 600

Las Vegas, NV 89102-2343

(702) 433-2889—Phone

(702) 425-9642—Fax

Email: staff@rosenblumlawlv.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

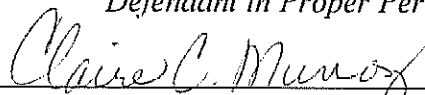
I hereby certify that service of the foregoing document:

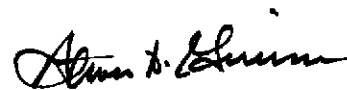
- 1. Notice of Entry of Order**
- 2. Notice of Withdrawal**

was made this 9th day of October, 2013, by depositing a copy of the same in
the U.S. Mails at Las Vegas, Nevada, postage prepaid, addressed to:

Matthew Geiger
8659 Horizon Wind Ave. Apt 102
Las Vegas, NV 89178
Plaintiff in Proper Person

Jennifer Gordon
91 Autumn Day St.
Henderson, NV 89012
Defendant in Proper Person


An Employee of ROSENBLUM LAW OFFICES



CLERK OF THE COURT

NOW

MOLLY ROSENBLUM, ESQ.

Nevada Bar No. 08242

ROSENBLUM LAW OFFICES

1701 W. Charleston Blvd. Ste 600

Las Vegas, Nevada 89102

(702) 433-2889 Phone

(702) 425-9642 Fax

Email: staff@rosenblumlawlv.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.

...

...

...

Plaintiff **MATTHEW ROBERT GEIGER** can be served with notice of further proceedings taken in this case at:

1 8659 Horizon Wind Ave Unit 102
2 Las Vegas NV 89178-8733
3 (702) 449-3506

4 DATED this 9th day of October, 2013.

5
6 Submitted by:
7 **ROSENBLUM LAW OFFICES**

8 */s/ Molly Rosenblum, Esq.*

9
10 **MOLLY ROSENBLUM, ESQ.**
11 Nevada Bar No. 08242
12 330 E Charleston Blvd, Ste 100
13 Las Vegas, Nevada 89104-1034
14 (702) 400-0000
15 Email: family@halfpricelawyers.com
16 Attorney for Plaintiff
17 in an Unbundled Capacity
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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
Hearing to be heard by the Honorable Gayle Nathan at the Family Courts and
Services Center, 601 N. Pecos Rd., Las Vegas, Nevada, on the 7th day of
November, 2013 at the hour of **8:30 AM** in Department T.

YOUR PRESENCE IS NECESSARY.

HONORABLE GAYLE NATHAN

By: 

Caryne Pierce
Judicial Executive Assistant

GAYLE NATHAN
DISTRICT JUDGE

FAMILY DIVISION, DEPT. T
LAS VEGAS, NV 89101-2408

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CERTIFICATE OF MAILING

I hereby certify that on the above file stamp date:

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

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

Matthew Robert Geiger
8659 Horizon Wind AVE UNIT 102
Las Vegas, NV 89178

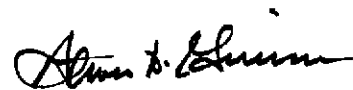
Jennifer Elise Gordon
91 Autumn Day ST
Henderson, NV 89012



Caryne Pierce
Judicial Executive Assistant
Department

GAYLE NATHAN
DISTRICT JUDGE

FAMILY DIVISION, DEPT. T
LAS VEGAS, NV 89101-2408



CLERK OF THE COURT

MOT

(Your name) Jennifer Gordon

(Address) 91 Autumn Day Street

Henderson, NV 89012

(Telephone) 702 234 9673

Acting In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Matthew Robert Geiger

Plaintiff/Petitioner,

vs.

Jennifer Elise Gordon

Defendant/Respondent

Case No.: D-10-430639-D

Dept. No.: T

Hearing Date: **12/31/2013**

Hearing Time: **9:30 AM**

Oral Argument Requested: Yes ☐ No ☒

MOTION FOR AN ORDER TO SHOW CAUSE

COMES NOW Jennifer Gordon appearing in Proper Person, and
(Your Name)

respectfully requests that this court order Matthew Geiger to appear and show
(Name of Opposing Party)

cause, if any, why Matthew Geiger should not be adjudicated guilty of contempt of
(Name of Opposing Party)

court and punished accordingly for the commission of the following acts:

State exactly what portion of the court's order the opposing party is not obeying.

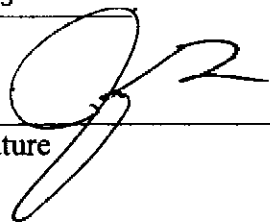
Plaintiff shall make a payment of \$100 on the arrears and child support in the amount of \$1246 shall be set as the new child support

Total monthly payment is due on the 1st day of each month, and continues thereafter until said children reach majority,

become emancipated or further order of the court.

1
2
3 This motion is made and based on all the papers and pleadings on file herein, the Points
4 and Authorities submitted herewith, the affidavit of Jennifer Gordon attached hereto and
5 any further evidence and argument as may be adduced at the hearing of this matter.

6 Dated this 12th day of november, 2013

7
8 
9 Signature

10
11 **I. POINTS AND LEGAL AUTHORITIES**

12 Nevada Revised Statutes 1.210(3) states that "The Court has the power to compel
13 obedience to its orders" and Nevada Revised Statutes 22.010(3) provides that "The refusal to
14 abide by a lawful order issued by the Court is contempt." NRS 22.100 provides, "Upon the
15 answer and evidence taken, the court or judge or jury, as the case may be, shall determine
16 whether the person proceeded against is guilty of the contempt charged; and if it be found that he
17 is guilty of the contempt, a fine may be imposed on him but not exceeding \$500.00, or he may be
18 imprisoned not exceeding 25 days except as provided in NRS 22.110."

19 **II. FACTS AND ARGUMENT**

20 I believe that Matthew Geiger has violated the court order entered on
21 (Name of Opposing Party)
22 September 03, 2013 in the following way:
23 (Date court order was filed)
24
25

Be very specific how the other party has violated the order.

Matthew was not only ordered by this court to pay the new amount of \$1346, but he was also ordered by the district attorneys family support division

He has been working the entire time of the modified order but has yet to make any attempt to make payments. He did not even bother

to show up for a court hearing at the district attorneys office on Sept 06, 2013. Because Matthew did not make any contact with them,

I had to submit his latest employer information to them. He had the whole month of September to make payments and did not

They sent paperwork out to his employer to garnish his wages for the new amount, but even his employer has still not taken the correct amount.

Matthew was ordered to pay at their office and to this day, he has yet to make a single payment.

The district attorneys office only recieved the previous \$400 ordered per month from the employer for Sept. In October, again, he

made no attempt to make the difference in payments at their office. I recieved only \$691. I have recieved NOTHING for November.

Please see exhibit attached. (Attach a copy of the court order that you believe is being violated.)

WHEREFORE, Movant requests that Matthew Geiger be ordered to
(Name of Opposing Party)

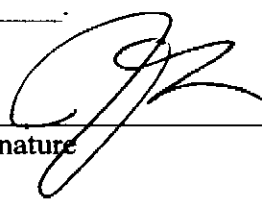
appear in Court to show cause why he/she should not be held in contempt of court.

This motion is made and based on all the papers and pleadings on file herein, the Points and

Authorities submitted herewith, the affidavit of Jennifer Gordon attached hereto and
(Your Name)

any further evidence and argument as may be adduced at the hearing of this matter.

Dated this 12th day of November, 2013.


Signature

AFFIDAVIT IN SUPPPORT OF MOTION FOR AN ORDER TO SHOW CAUSE

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

(Your name) Jennifer Gordon, being first duly sworn upon oath, deposes and says as follows:

1. I am the ☐ Plaintiff / ☒ Defendant in the above-entitled action. I have personal knowledge of the facts contained in my motion and in this affidavit and am competent to testify to these facts. The statements in this motion and affidavit are true and correct to the best of my knowledge.

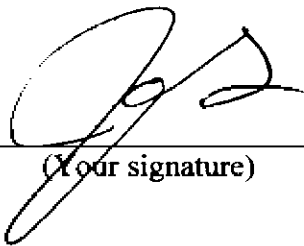
2. Additional facts to support my request for an order to show cause are: (write "N/A" if not applicable no additional facts. I am tired of having to pay to go back and forth to court because Matthew continues to NOT follow his orders. He has been told time and time again that he needs to follow the orders but instead he seems to be making a mockery of not only the judicial system, but of our judge that has been making the orders. He has not recieved any real punishment for his contempt in the past and that is the reason he ignores her orders, Its time the court stops scolding him and punish him for his contempt. For the last three years Matthew has repeatedly lied over and over again to the courts and been scolded when caught red handed, HOWEVER there have never truly been any consequences. His 'above the law' behavior continues and we end up having to pay the attorney fees every time we show up to court and he hasn't done what he was asked. There is a long history of this. The DAs office continously tries to garnish his wages but the only information they get is from myself. He will continue to follow this same behavior unless he is held accountable.

3. (Complete only if you are attaching exhibits to the motion)

I have attached the following exhibits to support this motion: (state title or briefly describe each exhibit – if less than 4 exhibits, write “N/A” on extra blanks.)

- 1) Notice of Entry of Minute Order dated Sept 10, 2013 Notes Matthew failed to notify myself of employment and failed to pay correct child support ;
 - 2) Masters Recommendation and support order from District attorney family support. Notes the rules of payments and amounts ;
 - 3) Updated District Attorney Family support divison payment sheet and arrearages ;
- and
- 4) NA

FURTHER YOUR AFFIANT SAYETH NOT:


(Your signature)

If executed in Nevada:

I declare under penalty of perjury that the foregoing is true and correct.

Signed on.....11-12-13.....
(Date) (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) (Signature)

EXHIBIT 1

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CLERK OF THE COURT

1 NEO

2 DISTRICT COURT
3 FAMILY DIVISION
4 CLARK COUNTY, NEVADA

5 Matthew Robert Geiger, Plaintiff.

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

6 vs.

7
8 Jennifer Elise Gordon, Defendant.


9 **NOTICE OF ENTRY OF MINUTE ORDER**

10 **TO: ALL PARTIES AND/OR THEIR ATTORNEYS**

11
12 Please take note that after a review of the court file, a Minute Order was
13 prepared by the Court. A copy of the Minute Order is attached hereto. I hereby certify
14 that I caused on the above file stamped date, a copy of the attached **MINUTE ORDER**
15 to be mailed postage prepaid to the following person or persons at their last known
16 address:

17 Matthew Geiger
18 8659 Horizon Wind Ave., Unit 102
Las Vegas, NV. 89178-8733

19 Jennifer Gordon
20 91 Autumn Day St.
Henderson, NV. 89012


Caryne Pierce
Judicial Assistant, Department T


CLERK OF THE COURT

1 ORDR
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5 DISTRICT COURT
6 CLARK COUNTY, NEVADA
7 ***

8 Matthew Robert Geiger, Plaintiff.

CASE NO.: D-10-430687-D
DEPT NO.: T

9 vs.

10 Jennifer Elise Gordon, Defendant.
11

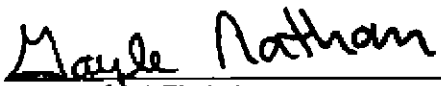
12 **MINUTE ORDER**

13 TO: ANY AND ALL INTERESTED PARTIES

14 YOU WILL PLEASE TAKE NOTICE that review of the court file indicates that a
15 Minute Order was drafted by the Court on September 03, 2013. Neither party
16 appeared nor were their Counsel present and the Court Ordered the minutes shall
17 SUFFICE. Therefore, this Court will prepare said paperwork as follows:
18

19 IT IS HEREBY ORDERED that the attached copy of the Minute Order is hereby
20 incorporated herein and will become the Order of this case.

21 DATED this 10th day of September, 2013.
22

23 
24 GAYLE NATHAN
25 DISTRICT JUDGE, DEPT T

26 Prepared by the Court
27
28

D-10-430639-D

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

September 03, 2013

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

September 03, 2013 9:30 AM Minute Order

HEARD BY: Nathan, Gayle

COURTROOM: Courtroom 14

COURT CLERK: Lucinda Tait

PARTIES:

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

JOURNAL ENTRIES

- MINUTE ORDER RE: CHILD SUPPORT OBLIGATION

This Court having taken under advisement the Defendant's request for a review of Plaintiff's child support obligation; the Court having ORDERED that the Plaintiff had an affirmative duty to notify the Defendant when he was employed; the Court makes the following FINDINGS and ORDER:

The Court having reviewed the Plaintiff's 2012 tax returns FINDS that the Plaintiff failed to notify Defendant of his employment; The Plaintiff, by the Order from the May 7, 2013 hearing, was to have his child support adjusted upon his employment.

Therefore, the Court FINDS that the Plaintiff's income in 2012 amounted to \$4985 per month; his child support for two children is therefore \$1246 per month (Defendant has primary custody and the PMI for one child is \$714 therefore there is no reduction forthcoming.)

For the 12 months of 2012 the Plaintiff's child support obligation totaled \$14,952;

PRINT DATE:	09/03/2013	Page 1 of 2	Minutes Date:	September 03, 2013
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D-10-430639-D

For the 9 months thus far for 2013 the Plaintiff's child support obligation totals \$ 11,214;
Child Support Enforcement shall apply any credits for payments Plaintiff has made in 2012 and 2013
against these sums.

Statutory interest and penalties shall accrue pursuant to statute.

Plaintiff shall make a payment of \$100 on the arrears and child support of \$1246 shall be set as the
new child support.

Absent a stipulation between the parties there shall be no modification to this Order without a
petition for same to Department T.

IT IS SO ORDERED.

****A copy of this MINUTE ORDER was forwarded to DAFS regarding their case number R-13-176576-
R. A copy of this MINUTE ORDER was also forwarded to the parties at their last known addresses
as listed in Odyssey by court clerk/**ct**

INTERIM CONDITIONS:

FUTURE HEARINGS: September 17, 2013 10:00 AM Motion
 Nathan, Gayle
 Courtroom 14
 Tait, Lucinda

PRINT DATE:	09/03/2013	Page 2 of 2	Minutes Date:	September 03, 2013
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EXHIBIT 2

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OFFICE OF THE DISTRICT ATTORNEY



STEVEN B. WOLFSON
District Attorney

Family Support Division

(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

Court Team
1900 East Flamingo Road, Suite 100, Las Vegas, NV 89119-5168
Fax: (702) 366-2390

TERESA M. LOWRY
Assistant District Attorney

CHRISTOPHER J. LALLI
Assistant District Attorney

MARY-ANNE MILLER
County Counsel

JEFFREY J. WITTHUN
Assistant Director

FA=E

October 1, 2013

JENNIFER E GORDON
91 AUTUMN BAY ST
HENDERSON NV 89012

Re: Jennifer Gordon vs. Matthew Geiger
Our case no.: R-13-176576-R

Dear Jennifer E Gordon:

Enclosed is a copy of the support order entered by the court.

Please note, if you move, you must notify us of your new mailing address as soon as possible so there will be no delay in your payments.

Any direct payments the non-custodial parent gives you after being noticed of the case in this office will be considered a gift and no credit will be given.

Pursuant to law, any of the parties involved in this lawsuit have the right to have this order reviewed for an adjustment of the child support order in compliance with state guidelines every three years. An application for review and adjustment may be obtained by writing, calling or coming into our office. Once you have obtained an application, you may request review and adjustment by supplying the completed application, with all required financial records, to the address above.

Please include the name of the non-custodial parent on all correspondence together with our case number as shown above.

Sincerely,

R B Dumas
Family Support Specialist

MRAO
STEVEN B. WOLFSON
DISTRICT ATTORNEY
Nevada Bar No. 001565
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200
TDD (702) 385-7486 (for the hearing impaired)
905053200A


CLERK OF THE COURT

District Court
CLARK COUNTY, NEVADA

Jennifer Gordon,

Petitioner,

Case No. R-13-176576-R

vs.

Department No. CHILD SUPPORT

Matthew Geiger,

Respondent.

MASTER'S RECOMMENDATION

This matter having been heard on SEPTEMBER 06, 2013 before the undersigned Hearing Master, having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

Parties present: ☐ Respondent ☐ Respondent's attorney ☒ Petitioner ☐ Petitioner's attorney

☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

Respondent's gross monthly income (GMI) : ; formula amount % of GMI=

Basis for deviation from state formula: _____

Respondent is to pay current support for the child(ren), Weston C Geiger, AND Chevy W Geiger.

CHILD SUPPORT

Respondent is to pay monthly:

\$1,246.00 child support

medical support (in lieu of health insurance)

spousal support

\$100.00 arrears payment

☒ ARREARAGES ☐ ARREARAGES NOT ADDRESSED AT THIS HEARING

Arrears/Obligation period is _____ through 08/31/13.

Arrears, Interest, and Penalties calculated through 08/31/13 by audit. For accounting purposes the next payment falls due 09/01/13.

child support arrearage of \$21,212.85 plus interest of \$1,117.84 penalty of \$1,961.27

medical support arrearage of _____ plus interest of _____ penalty of _____

spousal support arrearage of _____ plus interest of _____

medical expense arrearage of _____

genetic test costs of _____

total arrearages of \$21,212.85 total interest \$1,117.84 total penalty \$1,961.27

GRAND TOTAL (arrearages + interest + penalty) = \$24,291.96

☐ The total arrearage are hereby confirmed.

☒ The total arrearage, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095.

☐ Arrearage of \$_____ subject to modification until _____, and arrearage of \$_____ reduced to judgment.

☒ Arrearage listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.

☐

\$1,346.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

☐ Good cause to stay income withholding is based on: _____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.

☐ **ENFORCEMENT OF CONTROLLING ORDER:** The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

☐ **ESTABLISHMENT OF CONTROLLING ORDER:** This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

☐ Respondent is referred to Employment Services for an appointment on _____ at _____ AM.

☒ Health insurance coverage for the minor child(ren) herein:

☐ Respondent to provide; ☐ Petitioner to provide, excluding Medicaid; ☒ Both Parties to provide;

☒ if available through employer. ☐ shall provide per court order.

☒ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING

☐ MODIFICATION OF PRIOR ORDER:

☐ SUSPENSION OF LICENSES:

PAYMENTS

All mailed payments MUST be made in the form of a cashier's check, money order or business check ONLY, made payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are also accepted.

Payments can be mailed to:

State Collection and Disbursement Unit (SCaDU)
P.O. Box 98950
Las Vegas, Nevada 89193-8950

Payments can be made in person at:

State Collection and Disbursement Unit (SCaDU)
1900 East Flamingo Road
Las Vegas, Nevada 89119-5168

Additionally, the following information must be included with each payment: name (first, middle, last) of person responsible for paying child support, social security number of person responsible for paying child support, child support case number, and name of petitioner (first and last name of person receiving child support).

1 **NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.**

2 **NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.**

3 **NOTICE:** Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant
4 to NRS 99.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay
5 support for a child, pursuant to NRS 125B.095. If the Respondent pays support through income withholding and the full
6 obligation is not met by the amount withheld by the employer, the Respondent is responsible to pay the difference between
7 the court ordered obligation and the amount withheld by the employer directly to the state disbursement unit. If the
8 Respondent fails to do so, he/she may be subject to assessment of penalties and interest. The Respondent may avoid these
9 additional costs by making current support payments each month. If another state takes jurisdiction and obtains a new order,
10 Nevada interest and penalties will only be calculated to the date of the new order and will be enforced.

11 **NOTICE:** Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and
12 Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the
13 support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this
14 purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

15 **NOTICE:** Objections/Appeals are governed by EDCR1.40(c) and (f). You have ten (10) days from receipt of this Master's
16 Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final
17 Order/Judgment being ordered by District Court. However, the Master's Recommendation is not an Order/Judgment unless
18 signed and filed by a Judge.

19 **NOTICE:** Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written
20 Notice of Entry of Judgment.

21 **NOTICE:** Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address,
22 change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10)
23 days of such change.

24 Respondent to bring new financial statement and proof of income next date.

25 This order does not stay collection of support arrears by execution or any other means allowed by law.

26 *****
27 **MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:**

28 Last payment was \$92 on 08/26/13 from income withholding from unemployment benefits, and he is also working
through labor union. He collects unemployment when not working. Conforming to minute order filed 9/3/13, regarding
arrears and support, Dept. "T", family court.

29 **NEXT HEARING DATE IS O/C in Courtroom in Child Support Court at Child Support
30 Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further
proceedings.**

31 **DATED: SEPTEMBER 06, 2013**

32 
33 **MASTER**

34 **Respondent/Respondent's Attorney**
35 **Receipt of this document is**
36 **acknowledged by my signature.**

ORDER/JUDGMENT

☒ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this _____ day of _____, 20_____.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20_____ and this matter is remanded to Child Support Court on _____, 20_____ at _____ M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

By: *Ann Beringer*
DEPUTY DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168

EXHIBIT

CHILD SUPPORT / ALIMONY INCOME VERIFICATION FORM

Date 11/12/2013
Client Name JENNIFER E GORDON
SSN 511-90-4356

Child Support / Alimony verification for period

DECEMBER 2012 through NOVEMBER 2013

Name of Child Support / Alimony Provider
Case Number

MATTHEW ROBERT GEIGER
905053200A

Names of Children

WESTON C GEIGER
CHEVY W GEIGER

	Child Support / Alimony Sent to Client	Repayment Received From Client (e.g. Overpayment / Fees)
DEC 2012	\$ 406.16	\$ 0.00
JAN 2013	\$ 304.62	\$ 0.00
FEB 2013	\$ 203.08	\$ 0.00
MAR 2013	\$ 406.16	\$ 0.00
APR 2013	\$ 406.16	\$ 0.00
MAY 2013	\$ 101.53	\$ 0.00
JUN 2013	\$ 406.12	\$ 0.00
JUL 2013	\$ 507.65	\$ 0.00
AUG 2013	\$ 378.43	\$ 0.00
SEP 2013	\$ 498.46	\$ 0.00
OCT 2013	\$ 691.78	\$ 0.00
NOV 2013	\$ 0.00	\$ 0.00

MOLLIE LOGAN
CHILD SUPPORT ENFORCEMENT

INCOME VERIFICATION COVER SHEET

Date 11/12/2013
Client Name JENNIFER E GORDON
SSN 511-90-4356

CHILD SUPPORT CASES

PAYOR/PROVIDER

Payments received during the period
DECEMBER 2012 through NOVEMBER 2013

905053200A

MATTHEW ROBERT GEIGER

Yes (see form attached)

PUBLIC ASSISTANCE CASES

PAYEE/HEAD OF HOUSEHOLD

Grants paid during the period
DECEMBER 2012 through NOVEMBER 2013

511 90 4356

JENNIFER E GORDON

No

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

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

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

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

Party Filing Motion/Opposition: ☐ Plaintiff/Petitioner ☒ Defendant/Respondent

MOTION FOR/OPPOSITION TO Order to Show Cause

Notice

**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)**

Excluded Motions/Oppositions

- ☐ Motions filed before final Divorce/Custody Decree entered
(Divorce/Custody Decree NOT final)
- ☒ Child Support Modification ONLY
- ☐ Motion/Opposition For Reconsideration (Within 10 days of Decree)
Date of Last Order _____
- ☐ Request for New Trial (Within 10 days of Decree)
Date of Last Order _____
- ☐ Other Excluded Motion _____
(Must be prepared to defend exclusion to Judge)

NOTE: If no boxes are checked, filing fee **MUST** be paid.

☐ Motion/Opp IS subject to \$25.00 filing fee ☒ Motion/Opp IS NOT subject to filing fee

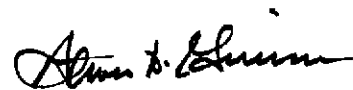
Date: November 12, 2013

Jennifer Gordon

Printed Name of Preparer

[Signature]

Signature of Preparer



CLERK OF THE COURT

NOTC

(Your name) Jennifer Gordon

(Address) 91 Autumn day Street

Henderson, NV 89012

(Telephone) 702 234 9673

Acting In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

Matthew Robert Geiger

Plaintiff,

vs.

Jennifer Elise Gordon

Defendant

Case No.: D-10-430639-D

Dept. No.: T

Oral Argument Requested:

Yes ☐ No ☒

**NOTICE OF MOTION FOR AN ORDER
TO SHOW CAUSE**

TO: Name of Opposing Party Matthew Robert Geiger; and

TO: Name of attorney for Opposing party, if one NA

PLEASE TAKE NOTICE that a hearing on this motion for relief will be held before the
Eight Judicial District Court located on: (**Check One**)

☒ The second floor of the Family Courts and Services Center located at 601 N. Pecos Road Las Vegas, Nevada 89101, on the (day) 12/31/2013 of (month) _____, 2008 in Department _____ at (time) 9:30 AM .m.

☐ The tenth floor of the Regional Justice Center located at 200 Lewis Avenue Las Vegas, Nevada 89155, on the (day) _____ of (month) _____, 2008 in Department _____ at (time) _____ .m.

Supporting documentation filed with this motion: (check all that apply)

☐ Affidavit(s)

☒ Exhibit(s)

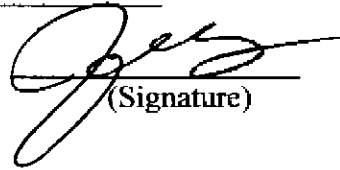
☐ Other _____

11/12/2013

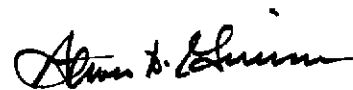
(date)

Jennifer Gordon

(type or print name)


(Signature)

NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING.



CLERK OF THE COURT

MOT

(Your name) Jennifer Gordon

(Address) 91 Autumn Day Street

Henderson, NV 89012

(Telephone) 702 234 9673

Acting In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Matthew Robert Geiger

Plaintiff/Petitioner,

vs.

Jennifer Elise Gordon

Defendant/Respondent

) Case No.: D-10-430639-D

) Dept. No.: T

) Hearing Date: **12/31/2013**

) Hearing Time: **9:30 AM**

) Oral Argument Requested: Yes ☐ No ☒

MOTION FOR AN ORDER TO SHOW CAUSE

COMES NOW Jennifer Gordon appearing in Proper Person, and
(Your Name)

respectfully requests that this court order Matthew Geiger to appear and show
(Name of Opposing Party)

cause, if any, why Matthew Geiger should not be adjudicated guilty of contempt of
(Name of Opposing Party)

court and punished accordingly for the commission of the following acts:

State exactly what portion of the court's order the opposing party is not obeying.

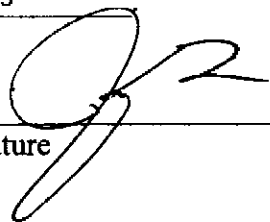
Plaintiff shall make a payment of \$100 on the arrears and child support in the amount of \$1246 shall be set as the new child support

Total monthly payment is due on the 1st day of each month, and continues thereafter until said children reach majority,

become emancipated or further order of the court.

1
2
3 This motion is made and based on all the papers and pleadings on file herein, the Points
4 and Authorities submitted herewith, the affidavit of Jennifer Gordon attached hereto and
5 any further evidence and argument as may be adduced at the hearing of this matter.

6 Dated this 12th day of november, 2013

7
8 
9 Signature

10
11 **I. POINTS AND LEGAL AUTHORITIES**

12 Nevada Revised Statutes 1.210(3) states that "The Court has the power to compel
13 obedience to its orders" and Nevada Revised Statutes 22.010(3) provides that "The refusal to
14 abide by a lawful order issued by the Court is contempt." NRS 22.100 provides, "Upon the
15 answer and evidence taken, the court or judge or jury, as the case may be, shall determine
16 whether the person proceeded against is guilty of the contempt charged; and if it be found that he
17 is guilty of the contempt, a fine may be imposed on him but not exceeding \$500.00, or he may be
18 imprisoned not exceeding 25 days except as provided in NRS 22.110."

19 **II. FACTS AND ARGUMENT**

20 I believe that Matthew Geiger has violated the court order entered on
21 (Name of Opposing Party)
22 September 03, 2013 in the following way:
23 (Date court order was filed)
24
25

Be very specific how the other party has violated the order.

Matthew was not only ordered by this court to pay the new amount of \$1346, but he was also ordered by the district attorneys family support division

He has been working the entire time of the modified order but has yet to make any attempt to make payments. He did not even bother

to show up for a court hearing at the district attorneys office on Sept 06, 2013. Because Matthew did not make any contact with them,

I had to submit his latest employer information to them. He had the whole month of September to make payments and did not

They sent paperwork out to his employer to garnish his wages for the new amount, but even his employer has still not taken the correct amount.

Matthew was ordered to pay at their office and to this day, he has yet to make a single payment.

The district attorneys office only recieved the previous \$400 ordered per month from the employer for Sept. In October, again, he

made no attempt to make the difference in payments at their office. I recieved only \$691. I have recieved NOTHING for November.

Please see exhibit attached. (Attach a copy of the court order that you believe is being violated.)

WHEREFORE, Movant requests that Matthew Geiger be ordered to
(Name of Opposing Party)

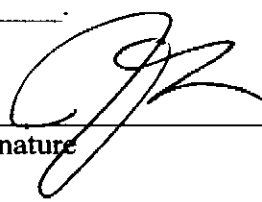
appear in Court to show cause why he/she should not be held in contempt of court.

This motion is made and based on all the papers and pleadings on file herein, the Points and

Authorities submitted herewith, the affidavit of Jennifer Gordon attached hereto and
(Your Name)

any further evidence and argument as may be adduced at the hearing of this matter.

Dated this 12th day of November, 2013.


Signature

AFFIDAVIT IN SUPPPORT OF MOTION FOR AN ORDER TO SHOW CAUSE

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

(Your name) Jennifer Gordon, being first duly sworn upon oath, deposes and says as follows:

1. I am the ☐ Plaintiff / ☒ Defendant in the above-entitled action. I have personal knowledge of the facts contained in my motion and in this affidavit and am competent to testify to these facts. The statements in this motion and affidavit are true and correct to the best of my knowledge.

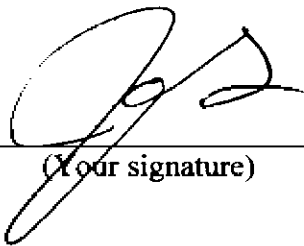
2. Additional facts to support my request for an order to show cause are: (write "N/A" if not applicable no additional facts. I am tired of having to pay to go back and forth to court because Matthew continues to NOT follow his orders. He has been told time and time again that he needs to follow the orders but instead he seems to be making a mockery of not only the judicial system, but of our judge that has been making the orders. He has not recieved any real punishment for his contempt in the past and that is the reason he ignores her orders. Its time the court stops scolding him and punish him for his contempt. For the last three years Matthew has repeatedly lied over and over again to the courts and been scolded when caught red handed, HOWEVER there have never truly been any consequences. His 'above the law' behavior continues and we end up having to pay the attorney fees every time we show up to court and he hasn't done what he was asked. There is a long history of this. The DAs office continously tries to garnish his wages but the only information they get is from myself. He will continue to follow this same behavior unless he is held accountable.

3. (Complete only if you are attaching exhibits to the motion)

I have attached the following exhibits to support this motion: (state title or briefly describe each exhibit – if less than 4 exhibits, write “N/A” on extra blanks.)

- 1) Notice of Entry of Minute Order dated Sept 10, 2013 Notes Matthew failed to notify myself of employment and failed to pay correct child support ;
 - 2) Masters Recommendation and support order from District attorney family support. Notes the rules of payments and amounts ;
 - 3) Updated District Attorney Family support divison payment sheet and arrearages ;
- and
- 4) NA

FURTHER YOUR AFFIANT SAYETH NOT:


(Your signature)

If executed in Nevada:

I declare under penalty of perjury that the foregoing is true and correct.

Signed on.....11-12-13.....
(Date) (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) (Signature)

EXHIBIT 1

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CLERK OF THE COURT

1 NEO

2 DISTRICT COURT
3 FAMILY DIVISION
4 CLARK COUNTY, NEVADA

5 ****

6 Matthew Robert Geiger, Plaintiff.

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

7 vs.

8 Jennifer Elise Gordon, Defendant.


9 **NOTICE OF ENTRY OF MINUTE ORDER**

10 **TO: ALL PARTIES AND/OR THEIR ATTORNEYS**

11
12 Please take note that after a review of the court file, a Minute Order was
13 prepared by the Court. A copy of the Minute Order is attached hereto. I hereby certify
14 that I caused on the above file stamped date, a copy of the attached **MINUTE ORDER**
15 to be mailed postage prepaid to the following person or persons at their last known
16 address:

17 Matthew Geiger
18 8659 Horizon Wind Ave., Unit 102
Las Vegas, NV. 89178-8733

19 Jennifer Gordon
20 91 Autumn Day St.
Henderson, NV. 89012

21 
22 Caryne Pierce
23 Judicial Assistant, Department T
24
25
26
27
28


CLERK OF THE COURT

1 ORDR
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5 DISTRICT COURT
6 CLARK COUNTY, NEVADA
7 ***

8 Matthew Robert Geiger, Plaintiff.

CASE NO.: D-10-430687-D
DEPT NO.: T

9 vs.

10 Jennifer Elise Gordon, Defendant.
11

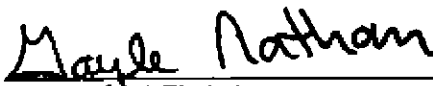
12 **MINUTE ORDER**

13 TO: ANY AND ALL INTERESTED PARTIES

14 YOU WILL PLEASE TAKE NOTICE that review of the court file indicates that a
15 Minute Order was drafted by the Court on September 03, 2013. Neither party
16 appeared nor were their Counsel present and the Court Ordered the minutes shall
17 SUFFICE. Therefore, this Court will prepare said paperwork as follows:
18

19 IT IS HEREBY ORDERED that the attached copy of the Minute Order is hereby
20 incorporated herein and will become the Order of this case.

21 DATED this 10th day of September, 2013.
22

23 
24 GAYLE NATHAN
25 DISTRICT JUDGE, DEPT T

26 Prepared by the Court
27
28

D-10-430639-D

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

September 03, 2013

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

September 03, 2013 9:30 AM Minute Order

HEARD BY: Nathan, Gayle

COURTROOM: Courtroom 14

COURT CLERK: Lucinda Tait

PARTIES:

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

JOURNAL ENTRIES

- MINUTE ORDER RE: CHILD SUPPORT OBLIGATION

This Court having taken under advisement the Defendant's request for a review of Plaintiff's child support obligation; the Court having ORDERED that the Plaintiff had an affirmative duty to notify the Defendant when he was employed; the Court makes the following FINDINGS and ORDER:

The Court having reviewed the Plaintiff's 2012 tax returns FINDS that the Plaintiff failed to notify Defendant of his employment; The Plaintiff, by the Order from the May 7, 2013 hearing, was to have his child support adjusted upon his employment.

Therefore, the Court FINDS that the Plaintiff's income in 2012 amounted to \$4985 per month; his child support for two children is therefore \$1246 per month (Defendant has primary custody and the PMI for one child is \$714 therefore there is no reduction forthcoming.)

For the 12 months of 2012 the Plaintiff's child support obligation totaled \$14,952;

PRINT DATE:	09/03/2013	Page 1 of 2	Minutes Date:	September 03, 2013
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D-10-430639-D

For the 9 months thus far for 2013 the Plaintiff's child support obligation totals \$ 11,214;
Child Support Enforcement shall apply any credits for payments Plaintiff has made in 2012 and 2013
against these sums.

Statutory interest and penalties shall accrue pursuant to statute.

Plaintiff shall make a payment of \$100 on the arrears and child support of \$1246 shall be set as the
new child support.

Absent a stipulation between the parties there shall be no modification to this Order without a
petition for same to Department T.

IT IS SO ORDERED.

****A copy of this MINUTE ORDER was forwarded to DAFS regarding their case number R-13-176576-
R. A copy of this MINUTE ORDER was also forwarded to the parties at their last known addresses
as listed in Odyssey by court clerk/**ct**

INTERIM CONDITIONS:

FUTURE HEARINGS: September 17, 2013 10:00 AM Motion
 Nathan, Gayle
 Courtroom 14
 Tait, Lucinda

PRINT DATE:	09/03/2013	Page 2 of 2	Minutes Date:	September 03, 2013
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EXHIBIT 2

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OFFICE OF THE DISTRICT ATTORNEY



STEVEN B. WOLFSON
District Attorney

Family Support Division

(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

Court Team
1900 East Flamingo Road, Suite 100, Las Vegas, NV 89119-5168
Fax: (702) 366-2390

TERESA M. LOWRY
Assistant District Attorney

CHRISTOPHER J. LALLI
Assistant District Attorney

MARY-ANNE MILLER
County Counsel

JEFFREY J. WITTHUN
Assistant Director

FA=E

October 1, 2013

JENNIFER E GORDON
91 AUTUMN BAY ST
HENDERSON NV 89012

Re: Jennifer Gordon vs. Matthew Geiger
Our case no.: R-13-176576-R

Dear Jennifer E Gordon:

Enclosed is a copy of the support order entered by the court.

Please note, if you move, you must notify us of your new mailing address as soon as possible so there will be no delay in your payments.

Any direct payments the non-custodial parent gives you after being noticed of the case in this office will be considered a gift and no credit will be given.

Pursuant to law, any of the parties involved in this lawsuit have the right to have this order reviewed for an adjustment of the child support order in compliance with state guidelines every three years. An application for review and adjustment may be obtained by writing, calling or coming into our office. Once you have obtained an application, you may request review and adjustment by supplying the completed application, with all required financial records, to the address above.

Please include the name of the non-custodial parent on all correspondence together with our case number as shown above.

Sincerely,

R B Dumas
Family Support Specialist

MRAO
STEVEN B. WOLFSON
DISTRICT ATTORNEY
Nevada Bar No. 001565
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200
TDD (702) 385-7486 (for the hearing impaired)
905053200A


CLERK OF THE COURT

District Court
CLARK COUNTY, NEVADA

Jennifer Gordon,

Petitioner,

Case No. R-13-176576-R

vs.

Department No. CHILD SUPPORT

Matthew Geiger,

Respondent.

MASTER'S RECOMMENDATION

This matter having been heard on SEPTEMBER 06, 2013 before the undersigned Hearing Master, having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

Parties present: ☐ Respondent ☐ Respondent's attorney ☒ Petitioner ☐ Petitioner's attorney

☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

Respondent's gross monthly income (GMI) : ; formula amount % of GMI=

Basis for deviation from state formula: _____

Respondent is to pay current support for the child(ren), Weston C Geiger, AND Chevy W Geiger.

CHILD SUPPORT

Respondent is to pay monthly:

\$1,246.00 child support

medical support (in lieu of health insurance)

spousal support

\$100.00 arrears payment

☒ ARREARAGES ☐ ARREARAGES NOT ADDRESSED AT THIS HEARING

Arrears/Obligation period is _____ through 08/31/13.

Arrears, Interest, and Penalties calculated through 08/31/13 by audit. For accounting purposes the next payment falls due 09/01/13.

child support arrearage of \$21,212.85 plus interest of \$1,117.84 penalty of \$1,961.27

medical support arrearage of _____ plus interest of _____ penalty of _____

spousal support arrearage of _____ plus interest of _____

medical expense arrearage of _____

genetic test costs of _____

total arrearages of \$21,212.85 total interest \$1,117.84 total penalty \$1,961.27

GRAND TOTAL (arrearages + interest + penalty) = \$24,291.96

☐ The total arrearage are hereby confirmed.

☒ The total arrearage, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095.

☐ Arrearage of \$_____ subject to modification until _____, and arrearage of \$_____ reduced to judgment.

☒ Arrearage listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.

☐

51,346.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

☐ Good cause to stay income withholding is based on: _____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.

☐ **ENFORCEMENT OF CONTROLLING ORDER:** The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

☐ **ESTABLISHMENT OF CONTROLLING ORDER:** This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

☐ Respondent is referred to Employment Services for an appointment on _____ at _____ AM.

☒ Health insurance coverage for the minor child(ren) herein:

☐ Respondent to provide; ☐ Petitioner to provide, excluding Medicaid; ☒ Both Parties to provide;

☒ if available through employer. ☐ shall provide per court order.

☒ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

☐ **CONTEMPT OF COURT** ☒ **NOT A SHOW CAUSE HEARING**

☐ **MODIFICATION OF PRIOR ORDER:**

☐ **SUSPENSION OF LICENSES:**

PAYMENTS

All mailed payments **MUST** be made in the form of a cashier's check, money order or business check **ONLY**, made payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are also accepted.

Payments can be mailed to:

State Collection and Disbursement Unit (SCaDU)
P.O. Box 98950
Las Vegas, Nevada 89193-8950

Payments can be made in person at:

State Collection and Disbursement Unit (SCaDU)
1900 East Flamingo Road
Las Vegas, Nevada 89119-5168

Additionally, the following information must be included with each payment: name (first, middle, last) of person responsible for paying child support, social security number of person responsible for paying child support, child support case number, and name of petitioner (first and last name of person receiving child support).

NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.

NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.

NOTICE: Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095. If the Respondent pays support through income withholding and the full obligation is not met by the amount withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be subject to assessment of penalties and interest. The Respondent may avoid these additional costs by making current support payments each month. If another state takes jurisdiction and obtains a new order, Nevada interest and penalties will only be calculated to the date of the new order and will be enforced.

NOTICE: Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

NOTICE: Objections/Appeals are governed by EDCR1.40(c) and (f). You have ten (10) days from receipt of this Master's Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final Order/Judgment being ordered by District Court. However, the Master's Recommendation is not an Order/Judgment unless signed and filed by a Judge.

NOTICE: Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written Notice of Entry of Judgment.

NOTICE: Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address, change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10) days of such change.

Respondent to bring new financial statement and proof of income next date.

This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

Last payment was \$92 on 08/26/13 from income withholding from unemployment benefits, and he is also working through labor union. He collects unemployment when not working. Conforming to minute order filed 9/3/13, regarding arrears and support, Dept. "T", family court.

NEXT HEARING DATE IS O/C in Courtroom in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: SEPTEMBER 06, 2013

[Signature]
MASTER

Respondent/Respondent's Attorney
Receipt of this document is
acknowledged by my signature.

ORDER/JUDGMENT

☒ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this _____ day of _____, 20_____.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20_____ and this matter is remanded to Child Support Court on _____, 20_____ at _____ M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

By: *Ann Beringer*
DEPUTY DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168

EXHIBIT

CHILD SUPPORT / ALIMONY INCOME VERIFICATION FORM

Date 11/12/2013
Client Name JENNIFER E GORDON
SSN 511-90-4356

Child Support / Alimony verification for period

DECEMBER 2012 through NOVEMBER 2013

Name of Child Support / Alimony Provider
Case Number

MATTHEW ROBERT GEIGER
905053200A

Names of Children

WESTON C GEIGER
CHEVY W GEIGER

	Child Support / Alimony Sent to Client	Repayment Received From Client (e.g. Overpayment / Fees)
DEC 2012	\$ 406.16	\$ 0.00
JAN 2013	\$ 304.62	\$ 0.00
FEB 2013	\$ 203.08	\$ 0.00
MAR 2013	\$ 406.16	\$ 0.00
APR 2013	\$ 406.16	\$ 0.00
MAY 2013	\$ 101.53	\$ 0.00
JUN 2013	\$ 406.12	\$ 0.00
JUL 2013	\$ 507.65	\$ 0.00
AUG 2013	\$ 378.43	\$ 0.00
SEP 2013	\$ 498.46	\$ 0.00
OCT 2013	\$ 691.78	\$ 0.00
NOV 2013	\$ 0.00	\$ 0.00

MOLLIE LOGAN
CHILD SUPPORT ENFORCEMENT

INCOME VERIFICATION COVER SHEET

Date 11/12/2013
Client Name JENNIFER E GORDON
SSN 511-90-4356

CHILD SUPPORT CASES

PAYOR/PROVIDER

Payments received during the period
DECEMBER 2012 through NOVEMBER 2013

905053200A

MATTHEW ROBERT GEIGER

Yes (see form attached)

PUBLIC ASSISTANCE CASES

PAYEE/HEAD OF HOUSEHOLD

Grants paid during the period
DECEMBER 2012 through NOVEMBER 2013

511 90 4356

JENNIFER E GORDON

No

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

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

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

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

Party Filing Motion/Opposition: ☐ Plaintiff/Petitioner ☒ Defendant/Respondent

MOTION FOR/OPPOSITION TO Order to Show Cause

Notice

**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)**

Excluded Motions/Oppositions

- ☐ Motions filed before final Divorce/Custody Decree entered
(Divorce/Custody Decree NOT final)
- ☒ Child Support Modification ONLY
- ☐ Motion/Opposition For Reconsideration (Within 10 days of Decree)
Date of Last Order _____
- ☐ Request for New Trial (Within 10 days of Decree)
Date of Last Order _____
- ☐ Other Excluded Motion _____
(Must be prepared to defend exclusion to Judge)

NOTE: If no boxes are checked, filing fee **MUST** be paid.

☐ Motion/Opp IS subject to \$25.00 filing fee ☒ Motion/Opp IS NOT subject to filing fee

Date: November 12, 2013

Jennifer Gordon

Printed Name of Preparer

[Signature]

Signature of Preparer

ORIGINAL

CERT

(Your Name) Jennifer Elise Gordon
(Address) 91 Autumn Day Street
Henderson, NV 89012
(Telephone) 702-234-9673
In Proper Person

FILED

Nov 13 2 17 PM '13

Shirley L. Brown
CLERK OF DISTRICT COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

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

Case No. D-10-430-639-D

Dept No. I

CERTIFICATE OF MAILING

I HEREBY CERTIFY that service of the (name of document) Motion for
Order to Show Cause was made on (date) 11-12-13 pursuant to
NRCP 5(b) by depositing a copy of same in the United States Mail in Las Vegas, Nevada,
postage prepaid, addressed as follows:

(Other party's name) Matthew Geiger
(Other party's address) 8659 Horizon Wind Avenue #102
(Address) Las Vegas, NV 89178
(Address)

DATED this 12 day of November, (year) 2013.

(Signature of person who mailed document) *Jennifer E. Gordon*

(Name of person who mailed document) Jennifer E. Gordon

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

Signed on 11-12-13
(date)

(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)

(signature)

7012 3460 0002 7012

U.S. Postal Service TM		
CERTIFIED MAIL TM RECEIPT		
(Domestic Mail Only: No Insurance Coverage Provided)		
For delivery information visit our website at www.usps.com		
LAX VEGAS NV 89178		
OFFICIAL USE		
Postage	\$ 1.72	0246
Certified Fee	\$3.10	08
Return Receipt Fee (Endorsement Required)	\$1.25	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 6.07	
		11/12/2013
Sent To <i>Matthew Giger</i>		
Street, Apt. No., or PO Box No. <i>8655 East 1st</i>		
City, State, ZIP+4 <i>Las Vegas NV 89178</i>		
PS Form 3800, August 2006 See Reverse for Instructions		

ORIGINAL

FILED

JAN 13 2014

Clerk of Court
CLERK OF COURT

ORD

Name: Jennifer Gordon

Address: 91 Autumn Day Street

Henderson, NV 89012

Telephone: 702 234 9673

In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

Matthew Robert Geiger

Plaintiff,

vs.

Jennifer Elise Gordon

Defendant

) Case No.: D-10-430639-D

) Dept No. T

)

) ORDER TO SHOW CAUSE

)

The Court, having reviewed the Defendants Motion for an Order to Show
(Plaintiff's or Defendant's)

Cause, the papers and pleadings filed, and relevant testimony, hereby finds that there is good
cause to grant the Defendant an Order to Show Cause.
(Plaintiff or Defendant)

IT IS HEREBY ORDERED that Matthew Geiger appear on the
(Name of Opposing Party)

19th of February 2014 at the hour of 9:30 a.m. before
(Day) (Month) (Time)

Department T of the Eighth Judicial District Court, located on: (Check One)
(Department Letter)

☒ The second floor of the Family Courts and Services Center located at 601 N. Pecos Road, Las Vegas, Nevada 89101.

☐ The tenth floor of the Regional Justice Center located at 200 Lewis Avenue, Las Vegas, Nevada 89155.

RECEIVED

JAN 02 2014

FAMILY COURT
DEPARTMENT 05

RECEIVED

NOV 13 2013

FAMILY COURT
DEPARTMENT T

©Clark County Family Law Self-Help Center

1 to SHOW CAUSE, if any, why such party should not be held in contempt of this Court for f
2 failure to obey this Court's order entered on September 16, 2013.
3 (Date Court Order Was Filed)

4 Dated this 16th day of January, ²⁰¹⁴~~2013~~₂₀₀₈.
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24
25
DISTRICT JUDGE 14.
GAYLE NATHAN

Submitted By: [Signature]

(Signature)

(Your Name) Jennifer Gordon

(Address) 91 Autumn Day Street

Henderson, NV 89012

(Telephone) 702 234 9673

Defendant/Plaintiff In Proper Person

ORIGINAL

FILED

JAN 13 2014

CLERK OF COURT

NEOJ

(Your name) Jennifer Elise Gordon

(Address) 91 Autumn Day Street

Henderson, NV 89012

(Telephone) 702-234-9673

(Circle one) Plaintiff/Defendant In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Matthew Robert Geiger

Plaintiff,

vs

Jennifer Elise Gordon

Defendant.

CASE NO.: D-10-430-639-D

DEPT NO.: T

NOTICE OF ENTRY OF ORDER

TO: (Other party's name) Matthew Geiger;
(Circle one) Plaintiff/Defendant

TO: (Other party's attorney) NA;
(Circle one) Plaintiff's/Defendant's Attorney

PLEASE TAKE NOTICE that an Order was duly entered in the above-referenced case
on the (day) 13 day of (month) January, (year) 2014.

DATED this 13 day of January, 2014.

(Your signature) By 

(Your name) Jennifer Gordon

(Address) 91 Autumn Day Street

Henderson, NV 89012

(Telephone) 702-234-9673

(Circle One) Plaintiff/Defendant In Proper Person

FILED

JAN 13 2014

John J. Blum
CLERK OF COURT

CERT

(Your Name) Jennifer Elise Gordon
(Address) 91 Autumn Day Street
Henderson, NV 89012
(Telephone) 702-234-9673
In Proper Person

DISTRICT COURT
CLARK COUNT, NEVADA

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

Case No. D-10-430-639-D

Dept No. T

CERTIFICATE OF MAILING

I HEREBY CERTIFY that service of the (name of document) Order to
Show Cause was made on (date) Jan 13, 2014 pursuant to
NRCP 5(b) by depositing a copy of same in the United States Mail in Las Vegas, Nevada,
postage prepaid, addressed as follows:

(Other party's name) Matthew Geiger
(Other party's address) 8655 Horizon Wind #102
(Address) Las Vegas, NV 89147
(Address)

DATED this 13 day of January, (year) 2014.

(Signature of person who mailed document)

(Name of person who mailed document)

Jennifer E. Gordon
Jennifer E. Gordon

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

Signed on 01-13-14
(date)

(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)

(signature)

2
FILED

FEB 11 2014

Alison L. Johnson
CLERK OF COURT

1 ORDR

2 (Your name) Jennifer Gordon

3 (Address) 91 Autumn Day Street
4 Henderson, NV 89012

5 (Telephone) (702) 234 9673
6 In Proper Person

7 DISTRICT COURT
8 CLARK COUNTY, NEVADA

9 Matthew Robert Geiger)
10 Plaintiff,)

CASE NO.: D-10-430639-D

11 vs)

DEPT. NO.: T

12)
13 DATE OF HEARING 01-16-14

14 Jennifer Elise Gordon)
15 Defendant.)

16 TIME OF HEARING 9:30am

17 ORDER

18 This matter having come on for Hearing on the 16 day of (month) January
19 (year) 2014, in the Family Division, Department T, 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 STATUS CHECK SET for 5/1/14 at 10:30am;

26 The Current Custody Order STANDS;

27 Visitation is MODIFIED as follows; Mom shall have the first(1st)

28 Weekend of each month, Dad shall have visitation Every other

RECEIVED

JAN 27 2014

FAMILY COURT
DEPARTMENT T 4

Weekend from Friday 6pm to Sunday 6pm. Receiving parties shall provide transportation. If the children have wrestling clinics on dad's time, dad shall pick up the children after the clinics are done; Dad will have 3/1/14, 3/2/14, Mom will have ~~3/7/14~~ 3/8/14, 3/9/14;

The Parties are REFERRED to the UNLV Cooperative Parenting class for a second time. Plaintiff shall sign up and attend the court first;

The Parties STIPULATED to a PROTECTIVE ORDER. Neither Party is to discuss this case or adult issues with the minor children and failure to do so will result in monetary sanction and/or jail time.

Defendant shall prepare the Order

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.

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.

16 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of October 25,
17 1980, adopted by the 14th Session of the Hague Conference on Private International Law apply if a
18 parent abducts or wrongfully retains a child in a foreign country. The parties are also put on notice
19 of the following provisions in NRS 125.510(8):

20 If a parent of the child lives in a foreign country or has significant commitments in a foreign
21 country:

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

25 (b) Upon motion of one of the parties, the court may order the parent to post a bond if
26 the court determines that the parent poses an imminent risk of wrongfully removing or
27 concealing the child outside the country of habitual residence. The bond must be in an
28 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.

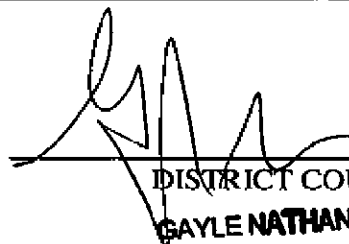
3 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125C.200:

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 6th day of Feb, 2014


17 
18 _____
19 DISTRICT COURT JUDGE
20 GAYLE NATHAN

21 Respectfully submitted:

22 (Your signature) _____

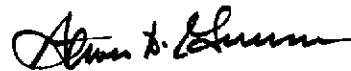
23 (Your name) _____

24 Plaintiff In Proper Person

25 (Your signature)  _____

26 (Your name) Jennifer Gordon _____

27 Defendant In Proper Person



CLERK OF THE COURT

CERT

(Your Name) Jennifer Gordon

(Address) 91 Autumn Day St.

Henderson, NV 89012

(Telephone) (702) 234 9673

(Email Address) elise433@gmail.com

In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

Matthew Geiger

Plaintiff,

vs.

Jennifer Gordon

Defendant.

CASE NO.: D-10-430639-D

DEPT NO.: T

CERTIFICATE OF MAILING

I, (name of person who mailed document) Jennifer Gordon, DO HEREBY
declare under penalty of perjury under the law of the State of Nevada that the following is true
and correct. That on (month) March (day) 28, (year) 14 service of the: (check one)

☐ Answer

☐ Opposition

☐ Motion

☐ Other _____

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

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

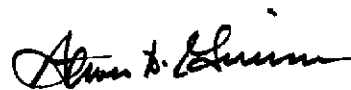
Matthew Geiger

8659 Horizon Wind Ave

Las Vegas, NV 89178

DATED this 28 day of March, 2014

(Signature)



CLERK OF THE COURT

NEOJ

(Your Name) Jennifer Gordon

(Address) 91 Autumn Day Street
Henderson, NV 89012

(Telephone) (702) 234 9673

(Email Address) elise433@gmail.com

Self-Represented

DISTRICT COURT

CLARK COUNTY, NEVADA

Matthew Geiger

Plaintiff,

vs.

Jennifer Gordon

Defendant.

CASE NO.: D-10-430639-D

DEPT NO.: T

NOTICE OF ENTRY OF ORDER

TO: Matthew Geiger;
(Opposing Party's Name and Opposing Party's Attorney's Name, if any)

PLEASE TAKE NOTICE that an Order was duly entered in the above-referenced case on the
11 day of (month) February, 20 14, a copy of which is attached hereto.

DATED this 28 day of March, 20 14

Submitted By: Jennifer Gordon
(Name) Jennifer Gordon
(Address) 91 Autumn Day Street
Henderson, NV 89012
(Telephone) (702) 234 9673
(Email Address) elise433@gmail.com

1 ORDR

FILED

2 (Your name) Jennifer Gordon

FEB 11 2014

3 (Address) 91 Autumn Day Street

Henderson, NV 89012

Ann K. Blum
CLERK OF COURT

4 (Telephone) (702) 234 9673

5 In Proper Person

6
7 **DISTRICT COURT**

8 **CLARK COUNTY, NEVADA**

9 Matthew Robert Geiger)
10 Plaintiff,)

CASE NO.: D-10-430639-D

11 vs)

DEPT. NO.: T

12)
13 Jennifer Elise Gordon)
14 Defendant.)

DATE OF HEARING 01-16-14

TIME OF HEARING 9:30am

15)
16)
17 **ORDER**

18 This matter having come on for Hearing on the 16 day of (month) January,
19 (year) 2014, in the Family Division, Department T, 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 STATUS CHECK SET for 5/1/14 at 10:30am; ~

26 The Current Custody Order STANDS;

27 Visitation is MODIFIED as follows; Mom shall have the first(1st)
28 Weekend of each month, Dad shall have visitation Every other

Weekend from Friday 6pm to Sunday 6pm. Receiving parties shall provide transportation. If the children have wrestling clinics on Dad's time, dad shall pick up the children after the clinics are done; Dad will have 3/1/14, 3/2/14, Mom will have ~~3/7/14~~ 3/8/14, 3/9/14;

The Parties are REFERRED to the UNLV Cooperative Parenting class for a second time. Plaintiff shall sign up and attend the court first;

The Parties STIPULATED to a PROTECTIVE ORDER. Neither Party is to discuss this case or adult issues with the minor children and failure to do so will result in monetary sanction and/or jail time.

Defendant shall prepare the Order

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

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

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

 (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

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

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

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

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

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

DATED this 6th day of February, 2014.

GAYLE NATHAN

DISTRICT COURT JUDGE

Respectfully submitted:

(Your signature) _____

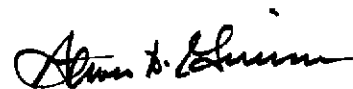
(Your name) _____

Plaintiff In Proper Person

(Your signature) _____

(Your name) _____

Defendant In Proper Person



CLERK OF THE COURT

NOPC
UNLV Division of Educational Outreach
edoutreach@unlv.edu
851 E. Tropicana
Las Vegas, Nevada 89119
(702) 895-3394
(702) 895-4195 (fax)

DISTRICT COURT, FAMILY DIVISION
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,

Plaintiff,

vs.

JENNIFER ELISE GORDON,

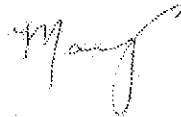
Defendant.

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

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

COMES NOW Plaintiff, MATTHEW GEIGER, submits Exhibit "1" attached hereto
attesting to his completion of the Cooperative Parenting Course offered by UNLV.

DATED this 29th day of April, 2014.



Margaret E. Pickard, Esq.
Nevada Bar No. 11855
NevadaMediator@gmail.com
10120 S. Eastern Avenue, Suite 140
Henderson, Nevada 89052
(702) 595-6771
(702) 605-7321 (fax)



CONTINUING EDUCATION

DIVISION OF EDUCATIONAL OUTREACH

April 29, 2014

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

Re: Matthew Geiger
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:

Matthew Geiger

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Margaret".

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

Alvin L. L...

CLERK OF THE COURT

1 ORDR

2 (Your name) Jennifer Gordon

3 (Address) 91 Autumn Day Street

Henderson, NV 89012

4 (Telephone) 702-234-9673

5 In Proper Person

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

9 Matthew Robert Geiger

10 Plaintiff,

11 vs

12 Jennifer Ellse Gordon

13 Defendant.

CASE NO.: D-10-430639-D

DEPT. NO.: T

DATE OF HEARING 05-01-14

TIME OF HEARING 10:30am

14 **ORDER**

15 This matter having come on for Hearing on the 1 day of (month) May
16 (year) 2014, in the Family Division, Department T, of the Eighth Judicial District
17 Court, County of Clark; and Plaintiff, being (circle one) present in Proper Person/not present, and
18 Defendant, being (circle one) present in Proper Person/not present and the Court being fully advised
19 in the premises, both as to subject matter as well as the parties thereto, and that jurisdiction is proper
20 in Nevada, and good cause appearing therefore;

21 **IT IS HEREBY ORDERED** that: (fill in the judge's orders below)
22 the following:

- 23 1. Since Defendant will be spending the entire month of July with the children, Plaintiff will have
24 extended visitation with the children from June 13 through June 22nd. In addition, Plaintiff will spend August
25 8th through August 17th with the children.

26
27
28
☐ Other
☐ Dismissed by Court
☐ Dismissed by Plaintiff (Statutory) Dismissal
☐ Dismissed by Defendant
☐ Transferred
☐ Disposed After Trial Start
Non-Trial Dispositions:
☐ Settled/Withdrawn:
☐ Without Judicial Conf/Hrg
☒ With Judicial Conf/Hrg
☐ By ADR
Trial Dispositions:
☐ Judgment Reached by Trial

RECEIVED

MAY 29 2014

Order For Hearing (FD-100)
Use only most current version.

Please call the Self-Help Center to confirm most current version.
**FAMILY COURT
DEPARTMENT T**

2. During Memorial Day weekend, Plaintiff will have the children commencing Friday, May 23rd through Monday, May 26th. Plaintiff will return the children to Defendant at 5:00 p.m. on Monday.

3. The following weekend, Friday, May 30, which is the fifth weekend, will be Defendants weekend.

4. The parties shall return to their regular visitation in June.

5. If Defendant is in Las Vegas at the beginning of July, Plaintiff will have the children on the 1st, 2nd, and 3rd of July. In addition, if Defendant comes back before the end of July, Plaintiff will receive visitation for the remainder of the month. Defendant shall provide Plaintiff with advance notice of when she intends to leave and when she intends to return.

6. Father's Day and Mother's Day trumps regular visitation; however, the parent only spends the day with the children, not the whole weekend. Please refer to the Department T Standard Holiday Schedule.

7. Defendant shall prepare the Order.

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 31st day of June, 2014.

17
18 
19 DISTRICT COURT JUDGE LB

20 Respectfully submitted:

21 **GAYLE NATHAN**

22 (Your signature) _____

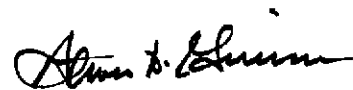
23 (Your name) _____

24 Plaintiff In Proper Person

25 (Your signature)  _____

26 (Your name) Jennifer E. Gordon _____

27 Defendant In Proper Person



CLERK OF THE COURT

NOPC
UNLV Division of Educational Outreach
edoutreach@unlv.edu
851 E. Tropicana
Las Vegas, Nevada 89119
(702) 895-3394
(702) 895-4195 (fax)

DISTRICT COURT, FAMILY DIVISION
CLARK COUNTY, NEVADA

MATTHEW ROBERT GEIGER,

Plaintiff,

vs.

JENNIFER ELISE GORDON,

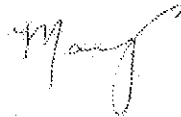
Defendant.

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

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

COMES NOW Defendant, JENNIFER GORDON, submits Exhibit "1" attached hereto
attesting to her completion of the Cooperative Parenting Course offered by UNLV.

DATED this 24th day of June, 2014.



Margaret E. Pickard, Esq.
Nevada Bar No. 11855
NevadaMediator@gmail.com
10120 S. Eastern Avenue, Suite 140
Henderson, Nevada 89052
(702) 595-6771
(702) 605-7321 (fax)



CONTINUING EDUCATION

DIVISION OF EDUCATIONAL OUTREACH

June 24, 2014

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:

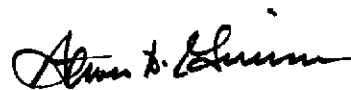
Jennifer Gordon

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Margaret".

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



CLERK OF THE COURT

CERT

(Your Name) Jennifer Elise Gordon

(Address) 91 Autumn Day Street

Henderson, NV 89012

(Telephone) 702-234-9673

In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

Matthew Robert Geiger,

Plaintiff,

vs.

Jennifer Elise Gordon,

Defendant.

Case No. D-10-430-639-D

Dept No. T

CERTIFICATE OF MAILING

I HEREBY CERTIFY that service of the (name of document) Order

was made on (date) June 26, 2014 pursuant to

NRCP 5(b) by depositing a copy of same in the United States Mail in Las Vegas, Nevada,
postage prepaid, addressed as follows:

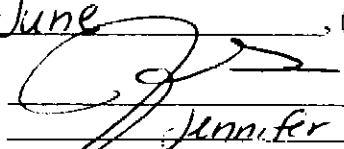
(Other party's name) Matthew Geiger

(Other party's address) 8659 Horizon Wind Ave #102

(Address) Las Vegas, NV 89178

(Address)

DATED this 26 day of June, (year) 2014.

(Signature of person who mailed document) 

(Name of person who mailed document) Jennifer Gordon

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

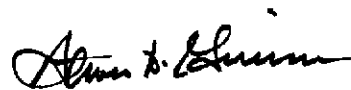
Signed on 6-26-14
(date)

(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)

(signature)



CLERK OF THE COURT

NEOJ

(Your name) Jennifer Elise Gordon

(Address) 91 Autumn Day Street

Henderson, NV 89012

(Telephone) 702-234-9673

(Circle one) Plaintiff/Defendant In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Matthew Robert Geiger)

Plaintiff.)

vs)

Jennifer Elise Gordon)

Defendant.)

CASE NO.: D-10-430-639-D

DEPT NO.: T

NOTICE OF ENTRY OF ORDER

TO: (Other party's name) Matthew Geiger;

(Circle one) Plaintiff/Defendant

TO: (Other party's attorney) NA;

(Circle one) Plaintiff's/Defendant's Attorney

PLEASE TAKE NOTICE that an Order was duly entered in the above-referenced case
on the (day) 4 day of (month) June, (year) 2014.

DATED this 26 day of June, 2014.

(Your signature) By 

(Your name) Jennifer Gordon

(Address) 91 Autumn Day Street

Henderson, NV 89012

(Telephone) 702-234-9673

(Circle One) Plaintiff/Defendant In Proper Person

Alison L. Shuman
CLERK OF THE COURT

1 ORDR
2 (Your name) Jennifer Gordon
3 (Address) 91 Autumn Day Street
4 Henderson, NV 89012
5 (Telephone) 702-234-9673
6 In Proper Person

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

9 Matthew Robert Geiger)
10 Plaintiff,)
11 vs)
12 Jennifer Elise Gordon)
13 Defendant.)
14)
15)
16)

CASE NO.: D-10-430639-D
DEPT. NO.: T
DATE OF HEARING 05-01-14
TIME OF HEARING 10:30am

17 **ORDER**

18 This matter having come on for Hearing on the 1 day of (month) May
19 (year) 2014, in the Family Division, Department T, 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 the following:

26 1. Since Defendant will be spending the entire month of July with the children, Plaintiff will have
27 extended visitation with the children from June 13 through June 22nd. In addition, Plaintiff will spend August
28 8th through August 17th with the children.

Non-Trial Dispositions: 1
☐ Other
☐ Consent/Agreement
☐ Mediation
☐ Arbitration
☐ Settlement
☐ Judgment Reached by Trial
☐ Disposed After Trial Start
☐ Judgment Reached by Trial
☐ Settled/Withdrawn:
☐ Without Judicial Conf/Hrg
☒ With Judicial Conf/Hrg
☐ By ADR

RECEIVED

MAY 29 2014

Order For Hearing on Dispute
Use only most current version.

Please call the Self-Help Center to confirm most current version.
**FAMILY COURT
DEPARTMENT T**

1 2. During Memorial Day weekend, Plaintiff will have the children commencing Friday, May 23rd through
2 Monday, May 26th. Plaintiff will return the children to Defendant at 5:00 p.m. on Monday.
3

4
5 3. The following weekend, Friday, May 30, which is the fifth weekend, will be Defendants weekend.
6

7 4. The parties shall return to their regular visitation in June.
8

9
10 5. If Defendant is in Las Vegas at the beginning of July, Plaintiff will have the children on the 1st, 2nd,
11 and 3rd of July. In addition, if Defendant comes back before the end of July, Plaintiff will receive visitation
12 for the remainder of the month. Defendant shall provide Plaintiff with advance notice of when she intends
13 to leave and when she intends to return.
14

15
16 6. Father's Day and Mother's Day trumps regular visitation; however, the parent only spends the day with
17 the children, not the whole weekend. Please refer to the Department T Standard Holiday Schedule.
18

19 7. Defendant shall prepare the Order.
20
21
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28

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 wilfully 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 31st day of June, 2014

17 
18 _____
19 DISTRICT COURT JUDGE RB

20 Respectfully submitted:

21 **GAYLE NATHAN**

22 (Your signature) _____

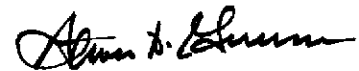
23 (Your name) _____

24 **Plaintiff In Proper Person**

25 (Your signature)  _____

26 (Your name) Jennifer E. Gordon _____

27 **Defendant In Proper Person**



CLERK OF THE COURT

MISC

(Your Name) Jennifer Gordon

(Address) 911 Autumn Day Street

Henderson, NV 89012

(Telephone) (702) 234 9673

In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Matthew Geiger,

Plaintiff,

vs.

Jennifer Gordon,

Defendant.

CASE NO.: D-10-430-639-0

DEPT. NO.: T

Affidavit of Margaret Pickard

Title of Document

Respectfully submitted by:

(Your signature)

(Your name)

☐ Plaintiff / ☒ Defendant In Proper Person



Fwd: Cooperative Parenting

Margaret Pickard <nevadamediator@gmail.com>
To: "Elise433 ." <elise433@gmail.com>

Mon, Jun 9, 2014 at 4:18 PM

----- Forwarded message -----

From: **Margaret Pickard** <nevadamediator@gmail.com>
Date: Thu, Jun 5, 2014 at 8:05 PM
Subject: Cooperative Parenting
To: elise433@gmails.com, Matthew Geiger <433ironworker@gmail.com>

Hello All,

I understand that Judge Nathan ordered you to retake the Cooperative Parenting Course to address several recurring issues, including but not limited to participation in the children's extra-curricular activities. As a general rule, I do not give legal advice during the course of the class, although I do provide guidance on child related issues.

Apparently, a primary issue in your case is the children's participation in wrestling and the frequency of tournaments; activities which Mom encourages and Dad finds encroach on his timeshare. While I do not know all of the details of your case, as you have only provided me snippets of the facts, I understand that your children are involved in wrestling and often compete in multiple events and/or tournaments, some of which overlap Dad's timeshare.

I have indicated that each parent should strive to be supportive of activities the children are interested in; this includes attending their events and/or contributing financially to them. However, when one parent enrolls the children in activities that dominate the other parent's timeshare, without his or her consent, the non-enrolling parent may set appropriate boundaries for the children's participation during his or her timeshare. Applying this to your case, if the children are consistently participating in three wrestling tournaments every Saturday, the non-enrolling parent, who I understand is Dad, is justified in setting a limit on one tournament each weekend.

However, if the children only participate in one tournament a week, and only occasionally have multiple events in a single weekend, both parents should be supportive of the activity. It's about balance.

As I have indicated in class, what activities the children participate in is not as crucial to their long term emotional well-being as reducing the level of the parent's conflict. I hope that you will both strive to do what is best for your children.

I hope this is helpful,

—
Margaret

Margaret E. Pickard, Esq.
Mediator
Parenting Coordinator

Adjunct Faculty
University of Nevada, Las Vegas

Duke University
University of California, Davis

10120 S. Eastern Avenue, Suite 140
Henderson, Nevada 89052
MargaretPickard@aol.com
(702) 595-6771

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MARGARET PICKARD PLLC

Mediation – Parenting Coordination

NevadaMediator@gmail.com

–
Margaret

Margaret E. Pickard, Esq.
Mediator
Parenting Coordinator

Adjunct Faculty
University of Nevada, Las Vegas
Duke University
University of California, Davis

10120 S. Eastern Avenue, Suite 140
Henderson, Nevada 89052
MargaretPickard@aol.com
(702) 595-6771

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FILED

AUG 04 2014

Ann L. Blum
CLERK OF COURT

1 CERT

2 (Your Name) Jennifer Gordon

3 (Address) 91 Autumn Day St.
4 Henderson, NV 89012

5 (Telephone) (702) 234 967

6 (Email Address) elise433@gmail.com

7 In Proper Person

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.: 7

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) August (day) 4, (year) 14 service of the: (check one)

19 ☐ Answer

☐ Opposition

20 ☒ Motion(s)

☒ Other Order to Show Cause

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 Robert Geiger Inmate ID# 01419268

25 Clark County Detention Center

26 330 South Casino Center Blvd

27 LAS VEGAS, NV 89101

28 DATED this 4 day of Aug, 2014

(Signature)

Alvin L. Quinn

CLERK OF THE COURT

MOT

(Your name) Jennifer Elise Gordon

(Address) 91 Autumn Day Street

Henderson, NV 89012

(Telephone) (702)234-9673

Acting In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Matthew Robert Geiger

Plaintiff/Petitioner,

vs.

Jennifer Elise Gordon

Defendant/Respondent

Case No.: D-10-430639-D

Dept. No.: I

Hearing Date: 09/23/2014

Hearing Time: 10:00 AM

Oral Argument Requested: Yes X No

MOTION FOR AN ORDER TO SHOW CAUSE

COMES NOW Jennifer Gordon appearing in Proper Person, and
(Your Name)

respectfully requests that this court order Matthew Geiger to appear and show
(Name of Opposing Party)

cause, if any, why Matthew Geiger should not be adjudicated guilty of contempt of
(Name of Opposing Party)

court and punished accordingly for the commission of the following acts:

State exactly what portion of the court's order the opposing party is not obeying.

On November 1, 2010 the court ordered among other things the following: that the partial parenting agreement was affirmed, adopted, and filed in open court. "The parents agree that prior to leaving for vacation; they will provide each other with a travel itinerary to include, dates of travel, destination, location, and telephone number where the children can be reached." On March 8, 2011 the court ordered the following: "Neither parent may take children out of State until further Order of this Court"

On September 16, 2013 the court ordered the following: "Absent a stipulation between the parties there shall be no modification to this Order without a petition for same to Department T."

1
2
3 This motion is made and based on all the papers and pleadings on file herein, the Points
4 and Authorities submitted herewith, the affidavit attached hereto and any further evidence and
5 argument as may be adduced at the hearing of this matter.

6 Dated this 04 day of August, 2014.

7
8 
9 Signature

10
11 **I. POINTS AND LEGAL AUTHORITIES**

12 Nevada Revised Statutes 1.210(3) states that "The Court has the power to compel
13 obedience to its orders" and Nevada Revised Statutes 22.010(3) provides that "The refusal to
14 abide by a lawful order issued by the Court is contempt." NRS 22.100 provides, "Upon the
15 answer and evidence taken, the court or judge or jury, as the case may be, shall determine
16 whether the person proceeded against is guilty of the contempt charged; and if it be found that he
17 is guilty of the contempt, a fine may be imposed on him but not exceeding \$500.00, or he may be
18 imprisoned not exceeding 25 days except as provided in NRS 22.110."

19
20 **II. FACTS AND ARGUMENT**

21 I believe that Matthew Geiger has violated the court order entered on
(Name of Opposing Party)

22 11-01-2010; 03-08-2011; 09-16-2013 in the following way: violating Jennifer's legal custody right to
(Date court order was filed)

23 be notified before Matthew took the kids out of state and to be provided with an itinerary. Not communicating
24 with Jennifer regarding their child Chevy, when he has been ill with a headache or vomiting. Since Chevy's brain surgery
25 on July 1, 2013 everything is to be logged. Matthew has failed to communicate any happenings. Jennifer has been
notified by the children upon their return as of issues with his well being. Matthew was arrested on July 26, 2014 while
the children were exercising their visitation time with him. No one notified Jennifer of his incarceration. Until Jennifer
involved the police, a day later, no one would even return Jennifer's calls or notify her of the boy's location.
Matthew filed for a modification of his child support payments at the child support division on June 19, 2014.
Matthew was fully aware that yet again he was going around the family court orders. He claimed on May 1, 2014 that he
had been working with the day office which was false. The last payment that had been garnished from him was in April

1 ***Be very specific how the other party has violated the order.***

2 and Matthew was denied workers compensation unlike what he stated on May 1. He also stated that Jennifer was
3 receiving 40% of his workers compensation which was not true. He was attempting to change the order because the
4 das office was ordering the suspension of his license AND moving to hold him in contempt for non-payment
5
6
7
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10

11 ***Please see exhibit attached.*** (Attach a copy of the court order that you believe is being violated.)
12

13 **WHEREFORE,** Movant requests that Matthew Geiger be ordered to
14 (Name of Opposing Party)

15 appear in Court to show cause why he/she should not be held in contempt of court.

16 This motion is made and based on all the papers and pleadings on file herein, the Points and

17 Authorities submitted herewith, the affidavit of Jennifer Gordon attached hereto and
18 (Your Name)

19 any further evidence and argument as may be adduced at the hearing of this matter.

20 Dated this 04 day of August, 2014

21
22 
23 Signature
24
25

AFFIDAVIT IN SUPPORT OF MOTION FOR AN ORDER TO SHOW CAUSE

(Your name) Jennifer Gordon, says as follows:

1. I am the ☐ Plaintiff / ☒ Defendant in the above-entitled action. I have personal knowledge of the facts contained in my motion and in this affidavit and am competent to testify to these facts. The statements in this motion and affidavit are true and correct to the best of my knowledge.

2. Additional facts to support my request for an order to show cause are: (write "N/A" if not applicable no additional facts. NA

3. (Complete only of you are attaching exhibits to the motion)

I have attached the following exhibits to support this motion: (state title or briefly describe each exhibit – if less than 4 exhibits, write "N/A" on extra blanks.)

- 1) Nov 01, 2010 order;
- 2) Sept 16, 2013 order;
- 3) June 19, 2014 DA's office court hearing;
- 4) _____.

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

Signed on August 4, 2014
(Date)


(Signature)

EXHIBIT 1

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DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW GEIGER,

Plaintiff

vs

JENNIFER GORDON,

Defendant

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

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.

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

5 Both parents are entitled to have access to medical information (both emergency and
6 routine), school records, and to consult with any and all professionals involved with the children.
7 The parents agree that each parent shall be empowered to obtain emergency health care for the
8 children without the consent of the other parent. The parents agree to notify the other parent as soon
9 as reasonably possible of any illness requiring medical attention or any emergency involving the
10 children.
11

12 OBTAINING INFORMATION

13 The parents agree to provide each other with the address and telephone number at
14 which the children reside.
15

16 The parents agree to notify each other, and the Clerk of the Court, in writing at least
17 ten (10) days prior to changing residences, phone numbers, or employment.
18

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

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

The parents agree that in the event any scheduled time cannot be kept due to illness or an emergency involving the children and/or the parent, the parent unable to comply with the schedule will notify the other parent and children as soon as possible.

The parents agree that the children shall be picked up and returned at the designated times. Should a delay become necessary, the receiving parent shall be notified immediately.

TRANSPORTATION

The parents agree that responsibility for providing transportation shall be assumed by the receiving parent.

SPECIAL PROVISIONS

The parents agree to share itinerary information when traveling out-of-state, to include dates of travel, destination, and an emergency contact number. If traveling outside of the country, each parent must have a notarized letter of consent from the other parent.

REMOVING THE CHILDREN FROM THE STATE

The parents agree that neither parent shall remove the children from the state of Nevada for the purpose of changing the children's residence without the written consent of both parents or until further Order of the Court. However, this does not preclude the children from participating in out-of-state family activities.

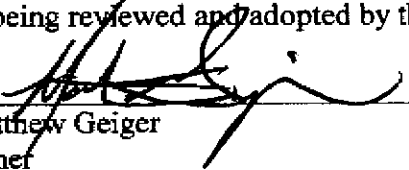
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1 MODIFYING THE PARTIAL PARENTING AGREEMENT

2 The terms and conditions of this Partial Parenting Agreement may be modified, in
3 writing, as the needs of the children and/or the circumstances of the parents change. However, the
4 parents understand that the concurred changes do not modify this Court Order. The parents are
5 encouraged to utilize mediation to resolve parenting issues prior to seeking Court intervention.
6

7 *****

8 The above agreement reflects the Partial Parenting Agreement formulated in
9 mediation. The parents realize they have the right to review this document with an attorney prior to
10 its being reviewed and adopted by the Court.

11 
12 Matthew Geiger
13 Father

11 
12 Jennifer Gordon
13 Mother

13 DATE 9-28-10

13 DATE 09-22-10

14 The above and foregoing Partial Parenting Agreement is acceptable to the parties.

15 
16 Matthew Geiger
17 In Proper Person

15 
16 Jennifer Gordon
17 In Proper Person

18 DATE 9-22-10

18 DATE 09-22-10

19 ORDER

20
21 Based upon the agreement of the parties and good cause being shown, IT IS
22 HEREBY ORDERED that the terms and conditions of the above Partial Parenting Agreement are
23 adopted.

24 DATED this _____ day of _____, 2010.

25 _____
26 District Court Judge
27
28

EXHIBIT 2

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

September 03, 2013

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

September 03, 2013 9:30 AM Minute Order

HEARD BY: Nathan, Gayle

COURTROOM: Courtroom 14

COURT CLERK: Lucinda Tait

PARTIES:

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

JOURNAL ENTRIES

- MINUTE ORDER RE: CHILD SUPPORT OBLIGATION

This Court having taken under advisement the Defendant's request for a review of Plaintiff's child support obligation; the Court having ORDERED that the Plaintiff had an affirmative duty to notify the Defendant when he was employed; the Court makes the following FINDINGS and ORDER:

The Court having reviewed the Plaintiff's 2012 tax returns FINDS that the Plaintiff failed to notify Defendant of his employment; The Plaintiff, by the Order from the May 7, 2013 hearing, was to have his child support adjusted upon his employment.

Therefore, the Court FINDS that the Plaintiff's income in 2012 amounted to \$4985 per month; his child support for two children is therefore \$1246 per month (Defendant has primary custody and the PMI for one child is \$714 therefore there is no reduction forthcoming.)

For the 12 months of 2012 the Plaintiff's child support obligation totaled \$14,952;

PRINT DATE:	09/03/2013	Page 1 of 2	Minutes Date:	September 03, 2013
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For the 9 months thus far for 2013 the Plaintiff's child support obligation totals \$ 11,214;
Child Support Enforcement shall apply any credits for payments Plaintiff has made in 2012 and 2013
against these sums.

Statutory interest and penalties shall accrue pursuant to statute.

Plaintiff shall make a payment of \$100 on the arrears and child support of \$1246 shall be set as the
new child support.

Absent a stipulation between the parties there shall be no modification to this Order without a
petition for same to Department T.

IT IS SO ORDERED.

****A copy of this MINUTE ORDER was forwarded to DAFS regarding their case number R-13-176576-
R. A copy of this MINUTE ORDER was also forwarded to the parties at their last known addresses
as listed in Odyssey by court clerk/**ct**

INTERIM CONDITIONS:

FUTURE HEARINGS: September 17, 2013 10:00 AM Motion
Nathan, Gayle
Courtroom 14
Tait, Lucinda

PRINT DATE:	09/03/2013	Page 2 of 2	Minutes Date:	September 03, 2013
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Exhibit 3

1 NOTM
2 Steven B. Wolfson, District Attorney
3 Nevada Bar No. 001565
4 Family Support Division
5 1900 East Flamingo Road, Suite 100
6 Las Vegas, Nevada 89119-5168
7 (702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)
8 905053200A

5 **DISTRICT COURT**
6 **CLARK COUNTY, NEVADA**

8 JENNIFER GORDON
9 Aka Jennifer Elise Gordon,

Petitioner,

Case no. R-13-176576-R

10 vs.

Dept. no. CHILD SUPPORT

11 MATTHEW GEIGER,

Respondent.

13
14 **DISTRICT ATTORNEY'S NOTICE OF MOTION &**
15 **MOTION TO MODIFY CHILD SUPPORT**

16 Date of Hearing: AUGUST 26, 2014
17 Time of Hearing: 10:45 AM
18 Court Room: 1

18 The District Attorney, by and through the undersigned Deputy District Attorney, moves the
19 above entitled Court for review and adjustment of the child support order previously entered between
20 the above-entitled parties, including provision for medical insurance or contribution toward
21 Petitioner's cost of providing medical insurance, if any.

22 This Motion is made and based upon the pleadings and papers on file herein and the attached
23 Points and Authorities, exhibit(s), if any, oral argument, if any, at the time of the hearing and

24 ☒ Proof of Respondent's income indicating the Respondent's gross monthly income to be
25 \$(to be determined). Updated income information to be provided at the time of the hearing, if any.

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27 ☐ Other:

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You will please take notice that the District Attorney's Office, Family Support Division, will bring the above and foregoing motion on for hearing in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, in Court Room 1 on the AUGUST 26, 2014 at 10.45 AM, or as soon thereafter as the case may be heard.

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1 POINTS AND AUTHORITIES IN SUPPORT OF THE MOTION

2 A review of a support order can be requested by either party or, in a welfare case, by the
3 District Attorney's Office, at least every three years pursuant to NRS 125B.145 (1). "Support"
4 includes not only financial maintenance, but also support for a child's health care and educational
5 needs. NRS 125B.020. The Court has authority to adjust an order if the moving party has
6 demonstrated changed circumstances since the order was last entered. *Rivero v. Rivero*, 125 Nev.
7 Adv. Op. No. 43, 216 P.3d 213 (2009). A modification may also be made on an order less than three
8 years old. Likewise, the moving party must show changed circumstances. NRS 125B.145(4).

9 NRS 125B.145(4) declares that "[a]n order for the support of a child may be reviewed at any
10 time on the basis of changed circumstances" and adds that a change of 20% or more in a child support
11 obligor's gross monthly income "shall be deemed to constitute changed circumstances requiring a
12 review for modification of the order for the support of a child." *Fernandez v. Fernandez*, 126 Nev.
13 Adv. Op. No. 3, 222 P.3d 1031 (2010). Changed circumstances may also include other events in the
14 lives of the parties such as emancipation or the addition of a new child to the family.

15 The statutory formula for child support is stated in NRS 125B.070 and NRS 125B.080.
16 Specifically, NRS 125B.070 (1)(b) requires the Court to set support using the non-custodial parent's
17 gross monthly income and applying 18% for one child, 25% for two children, 29% for three children,
18 and 2% more for each child thereafter. The Court may further increase or decrease support by
19 considering certain factors or deviations listed in NRS 125B.080(9).

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Steven B. Wolfson, District Attorney, Nevada Bar No. 081561
Family Support Division
1060 San Francisco Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

MOT/MOD

1 It is respectfully requested that this Honorable Court determine the Respondent's gross monthly
2 income or, in the alternative, impute earning capacity. The support order should be adjusted as
3 appropriate, and address health insurance, if available at a reasonable cost. If the Petitioner carries
4 health insurance for the child, the order should require the Respondent to contribute to the cost of the
5 health insurance for the child upon a showing of proof.

6 Dated this _____ day of 06-19-201, 20____.

7 Respectfully Submitted,

8 Steven B. Wolfson
9 District Attorney
Nevada Bar No. 001565

10 
11 _____
12 Deputy District Attorney

1 CERT

Case no. R-13-176576-R

2 CERTIFICATE OF MAILING

3 The foregoing DISTRICT ATTORNEY'S NOTICE OF MOTION & MOTION TO
4 MODIFY CHILD SUPPORT was served upon Jennifer E Gordon by mailing a copy thereof, first class
5 mail, postage prepaid to:

6
7 Jennifer E Gordon
8 91 Autumn Bay St
Henderson, NV 89012

9 on the 19th day of June, 2014.

10 
11 _____
12 Employee, District Attorney's Office
13 Family Support Division
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DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

<u>Matthew Geiger</u> Plaintiff/Petitioner)	CASE NO. <u>D-10-430639-D</u>
)	
-vs-)	DEPT. <u>10 T</u>
)	
<u>Jennifer Gordon</u> Defendant/Respondent)	FAMILY COURT MOTION/OPPOSITION FEE INFORMATION SHEET (NRS 19.0312)
)	

Party Filing Motion/Opposition: ☐ Plaintiff/Petitioner ☒ Defendant/Respondent

MOTION FOR/OPPOSITION TO _____

Notice

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)

Excluded Motions/Oppositions

- ☐ Motions filed before final Divorce/Custody Decree entered (Divorce/Custody Decree NOT final)
- ☐ Child Support Modification ONLY
- ☐ Motion/Opposition For Reconsideration (Within 10 days of Decree)
Date of Last Order _____
- ☐ Request for New Trial (Within 10 days of Decree)
Date of Last Order _____
- ☒ Other Excluded Motion Order to Show Cause
(Must be prepared to defend exclusion to Judge)

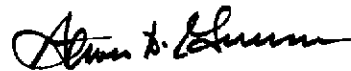
NOTE: If no boxes are checked, filing fee **MUST** be paid.

☐ Motion/Opp IS subject to \$25.00 filing fee ☒ Motion/Opp IS NOT subject to filing fee

Date: 08-4-14, 20 14

Jennifer Gordon
Printed Name of Preparer

[Signature]
Signature of Preparer



CLERK OF THE COURT

NOTC

(Your name) Jennifer Elise Gordon

(Address) 91 Autumn Day Street

Henderson, NV 89012

(Telephone) (702)234-9673

Acting In Proper Person

DISTRICT COURT

CLARK COUNTY, NEVADA

Matthew Robert Geiger

Plaintiff,

vs.

Jennifer Elise Gordon

Defendant

Case No.: D-10-430639-D

Dept. No.: I

Oral Argument Requested:

Yes X No

**NOTICE OF MOTION FOR AN ORDER
TO SHOW CAUSE**

TO: Name of Opposing Party Matthew Geiger; and

TO: Name of attorney for Opposing party, if one NA

PLEASE TAKE NOTICE that a hearing on this motion for relief will be held before the

Eighth Judicial District Court located on: **(Check One)**

☒ The second floor of the Family Courts and Services Center located at 601 N. Pecos Road Las Vegas, Nevada 89101, on the (day) 13rd of (month) September, 2014 in Department I at (time) 10:00 Am.

☐ The tenth floor of the Regional Justice Center located at 200 Lewis Avenue Las Vegas, Nevada 89155, on the (day) of (month) , 20 in Department at (time) m.

Supporting documentation filed with this motion: (check all that apply)

☒ Affidavit(s)

☒ Exhibit(s)

☐ Other _____

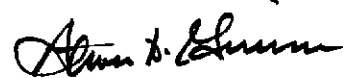
08-04-2014
(date)

Jennifer Gordon
(type or print name)


(Signature)

NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING.

28



CLERK OF THE COURT

1 MOT

2 Name: Jennifer Elise Gordon

3 Address: 91 Autumn Day Street

Henderson, NV 89012

4 Telephone: (702)234-9673

5 Email Address: elise433@gmail.com

In Proper Person

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

8 Matthew Robert Geiger

9 Plaintiff,

10 vs.

11 Jennifer Elise Gordon

12 Defendant.

CASE NO.: D-10-430639-D

DEPT: T

DATE OF HEARING: 09/23/2014

TIME OF HEARING: 10:00 AM

Oral Argument Requested: ☒ Yes ☐ No

13 **MOTION AND NOTICE OF MOTION FOR ORDERS TO MODIFY CHILD CUSTODY,**
14 **VISITATION, AND/OR CHILD SUPPORT**

15 TO: Name of Opposing Party and Party's Attorney, if any, Matthew Geiger

16 PLEASE TAKE NOTICE that a hearing on this motion will be held on the date and time
17 above before the Eighth Judicial District Court - Family Division located at: (☒ check one)

18 ☒ The Family Courts and Services Center, 601 N. Pecos Road Las Vegas, Nevada 89101.

19 ☐ The Regional Justice Center, 200 Lewis Avenue Las Vegas, Nevada 89101.

20 ☐ The Child Support Center of Southern Nevada, 1900 E. Flamingo Rd #100, LV NV 89119.

21 NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION
22 WITH THE CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH A
23 COPY OF YOUR RESPONSE WITHIN 10 DAYS OF THE RECEIPT OF THIS MOTION.
24 FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF COURT WITHIN 10
25 DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUEST FOR
26 RELIEF BEING GRANTED BY THE COURT WITHOUT A HEARING PRIOR TO THE
27 SCHEDULED HEARING DATE.

28 Submitted By: 

(☒ check one) ☐ Plaintiff / ☒ Defendant In Proper Person

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Motion to Modify Custody - June 2014

* You are responsible for knowing the law about your case. For more information on the law, this form, and free classes, visit www.familylawselfhelpcenter.org or the Family Law Self Help Center at 601 N. Pecos Road. To find an attorney, call the State Bar of Nevada at 382-0504.

1
2 **MOTION**

3 (Your name) Jennifer Gordon, in Proper Person, moves this Court for an
4 Order modifying child custody, visitation, and/or child support.
5

6
7 **POINTS AND AUTHORITIES**
8 **LEGAL ARGUMENT**

9 (☒ you must check and comply with the box below)

10 ☒ I understand that I must file my Financial Disclosure Form to support my request to
11 modify child support, and that failure to file my Financial Disclosure Form may result in
12 my request being denied.

13 The court may modify or vacate its child custody order at any time. NRS 125.510.
14 When considering whether to modify physical custody, the court must determine what type of
15 physical custody arrangement exists between the parties. The court must look at the actual
16 physical custody timeshare the parties are exercising to determine what custody arrangement is
17 in effect. Rivero v. Rivero, 125 Nev. 410, 430, 216 P.3d 213, 227 (2009).

18 Different tests apply to modify custody depending on the current custody arrangement.
19 Joint physical custody may be modified or terminated if it is in the best interest of the child.
20 NRS 125.510; Truax v. Truax, 110 Nev. 473, 874 P.2d 10 (1994). Primary physical custody
21 may be modified only when "(1) there has been a substantial change in circumstances affecting
22 the welfare of the child, and (2) the modification would serve the child's best interest." Ellis v.
23 Carucci, 123 Nev. 145, 153, 161 P.3d 239, 244 (2007).

24 A child support order must be reviewed by the court every three years upon request of a
25 parent or guardian. A child support order may be reviewed at any time on the basis of changed
26 circumstances. A change in 20% or more in the gross monthly income of a person subject to a
27 child support order shall be deemed changed circumstances. NRS 125B.145. Any inaccuracy
28 or falsification of financial information which results in an inappropriate award of child support
is also grounds to modify child support. NRS 125B.080.

FACTS AND ARGUMENT

A. Request to Modify Child Custody and/or Visitation

1. **Current Custody Order.** The current custody order was filed on (date) 09-27-2011.

2. **Modification of Legal Custody.** (☒ *check one*)

☐ Legal custody should not be changed. (*STOP. Go to Section 3*)

☒ Legal custody should be changed. Listed below are the current legal custody order and the legal custody order I would like the Court to order.

Child's Name:	Date of Birth	I Have Now: <input checked="" type="checkbox"/> <i>check one</i>	I Would Like: <input checked="" type="checkbox"/> <i>check one</i>
Weston Curtis Geiger	11-11-2001	<input type="checkbox"/> No legal custody <input checked="" type="checkbox"/> Joint legal custody <input type="checkbox"/> Sole legal custody	<input type="checkbox"/> Joint legal custody <input checked="" type="checkbox"/> Sole legal custody
Chevy Whalen Geiger	08-11-2004	<input type="checkbox"/> No legal custody <input checked="" type="checkbox"/> Joint legal custody <input type="checkbox"/> Sole legal custody	<input type="checkbox"/> Joint legal custody <input checked="" type="checkbox"/> Sole legal custody
		<input type="checkbox"/> No legal custody <input type="checkbox"/> Joint legal custody <input type="checkbox"/> Sole legal custody	<input type="checkbox"/> Joint legal custody <input type="checkbox"/> Sole legal custody
		<input type="checkbox"/> No legal custody <input type="checkbox"/> Joint legal custody <input type="checkbox"/> Sole legal custody	<input type="checkbox"/> Joint legal custody <input type="checkbox"/> Sole legal custody

a. It is in the best interest of the child(ren) to change legal custody because (*explain*):

Matthew is currently incarcerated in the Clark County Detention Center. After failing his drug

test in family courts in 2013, Matthew quit reporting to his probation officer. He has not

reported in over 10 months, lying to the courts that he is 'moving forward'. He has had an

active warrant for 9 months with the children in his care. Matthew has also left the state with

the children. He is also does not properly treat our sons brain condition. The children were in

his care when he was arrested, and nobody called Jennifer. She found through the jail a day later

3. **Modification of Physical Custody.** (☒ *check one*)

☐ Physical custody should not be changed. (*STOP. Go to Section 4*)

☒ Physical custody should be changed. Listed below are the current physical custody order and the physical custody order I would like the Court to order.

Child's Name:	Date of Birth	I Have Now: <input checked="" type="checkbox"/> check one	I Would Like: <input checked="" type="checkbox"/> check one
Weston Curtis Geiger	11-11-2001	<input type="checkbox"/> No visitation <input type="checkbox"/> Visitation only <input type="checkbox"/> Joint physical custody <input checked="" type="checkbox"/> Primary physical custody <input type="checkbox"/> Sole physical custody	<input type="checkbox"/> Visitation only <input type="checkbox"/> Joint physical custody <input type="checkbox"/> Primary physical custody <input checked="" type="checkbox"/> Sole physical custody
Chevy Whalen Geiger	08-11-2004	<input type="checkbox"/> No visitation <input type="checkbox"/> Visitation only <input type="checkbox"/> Joint physical custody <input checked="" type="checkbox"/> Primary physical custody <input type="checkbox"/> Sole physical custody	<input type="checkbox"/> Visitation only <input type="checkbox"/> Joint physical custody <input type="checkbox"/> Primary physical custody <input checked="" type="checkbox"/> Sole physical custody
		<input type="checkbox"/> No visitation <input type="checkbox"/> Visitation only <input type="checkbox"/> Joint physical custody <input type="checkbox"/> Primary physical custody <input type="checkbox"/> Sole physical custody	<input type="checkbox"/> Visitation only <input type="checkbox"/> Joint physical custody <input type="checkbox"/> Primary physical custody <input type="checkbox"/> Sole physical custody
		<input type="checkbox"/> No visitation <input type="checkbox"/> Visitation only <input type="checkbox"/> Joint physical custody <input type="checkbox"/> Primary physical custody <input type="checkbox"/> Sole physical custody	<input type="checkbox"/> Visitation only <input type="checkbox"/> Joint physical custody <input type="checkbox"/> Primary physical custody <input type="checkbox"/> Sole physical custody

a. It is in the best interest of the child(ren) to change physical custody because (*explain*):

For the same reasons stated above... Matthew has failed to protect the children from his troubled past. He continues to violate his court orders, which puts the children in the middle and subject to consequences of his bad judgement. He does not communicate any issues with our youngest child Chevy, putting Chevy at a severe health risk. Every headache and sickness is kept logged but Matthew refuses to tell Jennifer about issues when the children are in his care. He takes the children out of state without letting Jennifer know, and knowing that he has an open warrant for violating his probation. The courts and Jennifer were not aware at the time visitations were granted, that Matthew had not been reporting for probation, and had new charges. Matthew told the courts and his psychologist that he had no drug charges and had no convictions and that Jennifer was making those things up.

1 b. **You MUST complete this section if the other party currently has primary physical**
2 **custody and you want to change the custody order.**

3 Since the last order, there has been a substantial change in circumstances affecting the
4 welfare of the child(ren). *(Explain the substantial changes affecting the children that*
5 *have happened since the last custody order):* _____
6 _____
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____

16
17 4. **Visitation.** (☒ *check all that apply*)

18 ☐ Visitation should not be changed. (*STOP. Go to Section B*)

19 ☒ The regular visitation / timeshare should be changed. My proposed new visitation /
20 timeshare schedule is attached as Exhibit 1.

21 ☒ The holiday schedule should be changed. My proposed new holiday schedule is
22 attached as Exhibit 2.

23 **B. Request to Modify Child Support**

24 ☒ Not Applicable (☒ *check if not applicable, and sign and date page 7*)
25

26
27 5. **Current Child Support Order.** (☒ *check one*)

28 (Name of party) _____ currently pays (amount) \$ _____
 per month in child support for (number) _____ minor children. I want this order
 modified.

1
2 **6. Public Assistance.** (☒ check one)

3 ☐ I have never received Temporary Assistance for Needy Families (TANF).

4 ☐ I am now or have received Temporary Assistance for Needy Families (TANF) in the past.

5
6 **7. Parties' Income.**

7 The mother's gross monthly income is (insert amount): \$ _____ / OR ☐ unknown.

8 The father's gross monthly income is (insert amount): \$ _____ / OR ☐ unknown.

9
10 **8. Reason for Modification.** I want child support modified because: (☒ check all that apply)

11 ☐ Child support should be reset based on the change in custody I am requesting.

12 ☐ The gross monthly income of the person paying child support has changed by more than
13 20% since the last child support order was entered.

14 ☐ It has been more than three years since child support was last reviewed.

15 ☐ The following child(ren) has/have emancipated (write name(s)):

16 _____
17 ☐ The current child support order was set based on inaccurate or false information. (give
18 the reason you believe child support was set inaccurately) _____

19 _____
20 ☐ The parties are not following the custodial schedule on which child support was based:
21 (explain the custodial schedule you have been following): _____

22 _____
23 _____
24 _____
25 It is in the children's best interest to modify child support because (tell the judge why it is in
26 the children's best interest to change child support): _____

27 _____
28 _____

1
2 **9. Amount Requested. (☒ check one)**

3 ☐ Child support should be modified so that (*name of person who should pay child support*)

4 _____ pays (*amount*) \$ _____ per month in child support.

5 ☐ Child support should be set at the statutory minimum of \$100 per month, per child;

6 ☐ I'm not sure how much child support should be paid. The judge should set child support.


7 ☐ Other (*explain how much child support should be ordered and how you came up with the*
8 *amount of child support*): _____

9 _____
10 _____
11
12 I respectfully ask the Court to grant me the relief requested above, including an award of
13 attorney's fees if I am able to retain an attorney for this matter, and any other relief the Court
14 finds appropriate.

15 DATED August 4, 2014.

16
17 Submitted By: (*your signature*)

18 (*print your name*)

19 
20 _____
21 Jennifer Gordon
22
23
24
25
26
27
28

**DECLARATION IN SUPPORT OF MOTION TO MODIFY CHILD CUSTODY,
VISITATION, AND/OR CHILD SUPPORT**

I declare, under penalty of perjury:

1. That I have personal knowledge of the facts contained in this Motion and in this Declaration and I am competent to testify to the same.
2. That the statements in this Motion and Declaration are true and correct to the best of my knowledge.
3. Additional facts to support my requests include: _____

4. I have attached the following Exhibit(s) to the Motion to support my requests: (*Describe exhibit or write N/A on any blank lines.*)

- a. Matthews Psychological evaluation
- b. Matthews probation sentencing
- c. Matthews probation violation date and warrant date
- d. _____

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

DATED August 4, 2014.

Submitted By: (your signature) _____

(print your name) _____

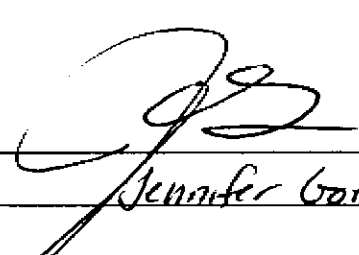

Jennifer Gordon

EXHIBIT 1
REGULAR TIMESHARE / VISITATION

Week	Sun.	Mon.	Tues.	Wed.	Thurs.	Fri.	Sat.
<i>Sample</i>	Mom Pick up at 11 a.m.	Mom	Dad Pick up after school at 3 p.m.	Dad	Dad	Mom Pick up after school at 3 p.m.	Mom
Week #1		NO					
Week #2							
Week #3		VISITATION					
Week #4							

*no holidays
until courts approve*

**EXHIBIT 2
HOLIDAY SCHEDULE**

Check box if this holiday applies:	Holiday:	Time (circle a.m. or p.m.):	Even Years	Odd Years
<input type="checkbox"/>	New Year's Eve	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	New Year's Day	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Martin Luther King, Jr. Day	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Presidents' Day	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Passover	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Easter	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Memorial Day	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Mother's Day	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Father's Day	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	4 th of July	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Labor Day	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Rosh Hashanah	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Yom Kippur	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Nevada Day	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Halloween	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Veterans Day	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Thanksgiving Day	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad

EXHIBIT 2 Continued

<input type="checkbox"/>	Chanukkah (Days):	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Chanukkah (Days):	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Christmas Eve	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Christmas	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Father's Birthday	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Mother's Birthday	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>	Child's Birthday	From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>		From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad
<input type="checkbox"/>		From: _____ a.m./p.m. To: _____ a.m./p.m.	Mom Dad	Mom Dad

Exhibit

A

**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

End

B

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**
Cross-Reference 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
702-472-8686(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 GEEGER 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

Ente

C

REGISTER OF ACTIONS

CASE No. 10C262424

The State of Nevada vs Matthew R Geiger

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\$Case Type: **Felony/Gross Misdemeanor**Date Filed: **02/26/2010**Location: **Department 25**Cross-Reference 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
702-472-8686(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****DISPOSITIONS**03/25/2010 **Plea** (Judicial Officer: Mosley, Donald)1. UNLAWFUL POSSESSION OF A CONTROLLED SUBSTANCE NOT FOR PURPOSE OF SALE
Guilty11/10/2010 **Disposition** (Judicial Officer: Mosley, Donald)1. UNLAWFUL POSSESSION OF A CONTROLLED SUBSTANCE NOT FOR PURPOSE OF SALE
Guilty11/10/2010 **Adult Adjudication** (Judicial Officer: Mosley, Donald)

1. UNLAWFUL POSSESSION OF A CONTROLLED SUBSTANCE NOT FOR PURPOSE OF SALE

Fee Totals:

ADMINISTRATIVE ASSESSMENT FEE --- Crim fee sch

\$25.00

DRUG ANALYSIS FEE --- Crim fee sch - \$60

\$60.00

DNA ANALYSIS FEE --- Crim fee sch - \$150

\$150.00

Fee Totals \$

\$235.00

OTHER EVENTS AND HEARINGS02/26/2010 **Criminal Bindover**

CRIMINAL BINDOVER Fee \$0.00

10C2624240001.tif pages

02/26/2010 **Hearing**

INITIAL ARRAIGNMENT

10C2624240002.tif pages

03/10/2010 **Information**

INFORMATION

10C2624240004.tif pages

03/11/2010 **Hearing**

ARRAIGNMENT CONTINUED

10C2624240005.tif pages

03/11/2010 **Initial Arraignment** (9:00 AM) ()

INITIAL ARRAIGNMENT Relief Clerk: Karina Kennedy, Sylvia Courtney/sc Reporter/Recorder: Kiara Schmidt Heard By: Kevin Williams

Parties Present

Minutes

Result: Matter Heard

03/12/2010 **Reporters Transcript**

REPORTER'S TRANSCRIPT OF UNCONDITIONAL WAIVER OF PRELIMINARY HEARING - HEARD 02-25-10 02-25-10

10C2624240006.tif pages

03/25/2010 **Conversion Case Event Type**

SENTENCING (VL 7/20/10)

10C2624240007.tif pages

03/25/2010 **Information**

AMENDED INFORMATION

10C2624240008.tif pages

03/25/2010 **Memorandum**

GUILTY PLEA MEMORANDUM/AGREEMENT

10C2624240009.tif pages

03/25/2010 **Arraignment Continued** (9:00 AM) ()

ARRAIGNMENT CONTINUED Court Clerk: Rebecca Foster Relief Clerk: Billie Jo Craig/bjc Reporter/Recorder: Kiara Schmidt Heard By: Kevin Williams

Parties Present

Minutes

Result: Granted

07/14/2010 **Motion**

MOTION TO CONTINUE SENTENCING (VL 7/20/10)

10C2624240010.tif pages

07/20/2010 **Conversion Case Event Type**

SENTENCING

10C2624240011.tif pages

07/26/2010 **CANCELED Sentencing** (9:00 AM) ()

Vacated

Result: Vacate

07/26/2010 **CANCELED Motion to Continue** (9:00 AM) ()

Vacated

Result: Vacate

08/11/2010 **Sentencing** (9:00 AM) (Judicial Officer Mosley, Donald)

08/11/2010, 09/27/2010

Parties Present

Minutes

08/11/2010 Reset by Court to 08/11/2010

Result: Continued

10/08/2010 **Bench Warrant**

11/01/2010 **Bench Warrant Return**

11/03/2010 **Bench Warrant Return** (9:00 AM) (Judicial Officer Mosley, Donald)

Parties Present

Minutes

Result: Matter Heard

11/10/2010 **Sentencing** (9:00 AM) (Judicial Officer Mosley, Donald)

Parties Present

Minutes

Result: Matter Heard

11/19/2010 **Judgment of Conviction**

12/04/2010 **Order Admitting Defendant to Probation & Fixing Terms**

Probation Agreement and Rules Order Admitting Defendant to Probation & Fixing Terms Thereof

06/11/2012 **Criminal Order to Statistically Close Case**

08/06/2012 **Case Reassigned to Department 25**

Case reassigned from Judge Mosley

10/23/2013 **Bench Warrant**

Bench Warrant

10/23/2013 **Probation Violation Report**

FINANCIAL INFORMATION

Defendant Geiger, Matthew R
Total Financial Assessment

235.00

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Matthew Geiger
Plaintiff/Petitioner

-vs-

Jennifer Gordon
Defendant/Respondent

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

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

Party Filing Motion/Opposition: ☐ Plaintiff/Petitioner ☒ Defendant/Respondent

MOTION FOR/OPPOSITION TO _____

Notice

**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)**

Excluded Motions/Oppositions

- ☐ Motions filed before final Divorce/Custody Decree entered
(Divorce/Custody Decree NOT final)
- ☐ Child Support Modification ONLY
- ☐ Motion/Opposition For Reconsideration (Within 10 days of Decree)
Date of Last Order _____
- ☐ Request for New Trial (Within 10 days of Decree)
Date of Last Order _____
- ☒ Other Excluded Motion Motion to Modify
(Must be prepared to defend exclusion to Judge) Order Shuster

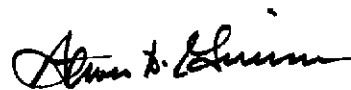
NOTE: If no boxes are checked, filing fee **MUST** be paid.

☐ Motion/Opp IS subject to \$25.00 filing fee ☒ Motion/Opp IS NOT subject to filing fee

Date: 08-4, 20 14

Jennifer Gordon
Printed Name of Preparer

[Signature]
Signature of Preparer



CLERK OF THE COURT

1 MOT

2 (Your Name) Jennifer Elise Gordon

3 (Address) 91 Autumn Day Street

4 Henderson, NV 89012

5 (Telephone) (702)234-9673

6 (Email Address) elise433@gmail.com

7 Self-Represented

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 Matthew Robert Geiger

11 Plaintiff,

12 vs.

13 Jennifer Elise Gordon

14 Defendant.

CASE NO.: D-10-430639-D

DEPT NO.: T

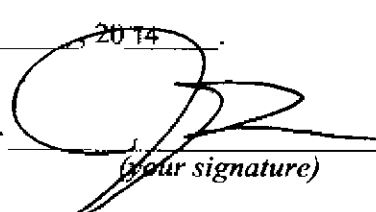
15 **EX PARTE MOTION FOR AN ORDER SHORTENING TIME**

16 ☐ Plaintiff / ☒ Defendant, Jennifer Gordon in proper person,
17 hereby files an Ex Parte Motion for an Order Shortening Time pursuant to EDCR 5.31, and
18 requests that this Court shorten the time in which to hear the Movant's (*name of motion to be*
19 *heard*) motion for orders to modify child custody, visitation, and/or child, which was filed on (*date*)
20 August 4, 2014 support; motion for an order to show cause.

21 This application is based upon the pleadings and papers on file and the affidavit of Movant
22 attached to this motion.

23 DATED this (*day*) 4 day of (*month*) August, 2014.

24 Respectfully Submitted By: ►

25 
(*your signature*)

26 Jennifer Gordon

27 (*printed name*)

DECLARATION OF MOVANT IN SUPPORT OF EX PARTE MOTION
FOR AN ORDER SHORTENING TIME

(your name) Jennifer Gordon, states as follows:

1. I am the Movant in the above-entitled action. I have personal knowledge of the facts contained herein and am competent to testify to these facts.

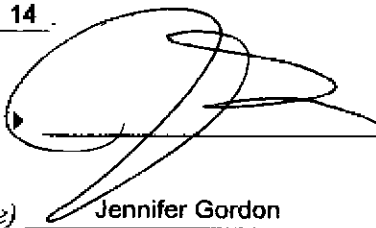
2. I filed my (name of motion) motion for orders to modify child custody and order to show cause on (date) August 4, 2014. I was given a hearing date of (date) 09/23/2014 at (time of hearing) 10:00 Am.m.

3. There is an emergency that cannot wait until that date to be heard. The emergency is: Matthew is incarcerated in the clark county detention center for violation of his probation. He has been on the run from his probation and the law for the last 10 months which put the children in jeopardy. He was recently caught while the children were with him and Jennifer was never notified. Jennifer found through a friend that Matthew had been arrested. She immediately tried making contact with boys but could not. She finally located them with Matthews wife after having to threaten to involve the police if someone would not tell her where the boys were. Jennifer is afraid with all the trouble Matthew has been in and is currently still in, that he may try to run with the children if he is released.

4. This Ex Parte Motion for an Order Shortening Time is made in good faith.

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

DATED this 04 day of August, 20 14.

Submitted By: (your signature) 

(print your name) Jennifer Gordon

//

Allen B. Shuman
CLERK OF THE COURT

OST
Jennifer Gordon
91 Autumn Day St.
Henderson, NV 89012

In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

Matthew Geiger
Plaintiff,
vs.
Jennifer Gordon
Defendant.

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

ORDER SHORTENING TIME

Upon application of the ☐ Plaintiff ☒ Defendant, appearing in Proper Person, and good cause appearing therefor:

IT IS HEREBY ORDERED that the time for hearing ☐ Plaintiff's/ ☒ Defendant's motions (order to show cause AND modify custody) is hereby shortened and shall be heard on the 28th day of August, 2014 at the hour of 8:30 o'clock a.m. in Department T.

It is further Ordered that Plaintiff's visitation is suspended pending further court orders. He may telephone the boys every other day between 7-730PM.
DATED this 6th day of August, 2014. It is further ordered that Defendant shall bring medical records in support of her concerns for Chevy

Respectfully Submitted:

Jennifer Gordon

DISTRICT COURT JUDGE

GAYLE NATHAN

☐ Plaintiff / ☒ Defendant in Proper Person

RECEIVED

AUG 05 2014

FAMILY COURT
DEPARTMENT T

SERVICE TO: MATTHEW ROBERT GEIGER
INMATE ID# 01419268

Electronically Filed
08/08/2014 01:51:17 PM

1 AFFT

2 (Your Name) Jennifer Gordon

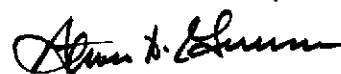
3 (Address) 91 Autumn Day Street

4 Henderson, NV 89012

5 (Telephone) (702) 234 9673

6 (Email Address) elise433@gmail.com

Self-Represented



CLERK OF THE COURT

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

9 Matthew Robert Geiger

10 Plaintiff,

11 vs.

12 Jennifer Elise Gordon

13 Defendant.

CASE NO.: D-10-430639-D

DEPT NO.: T

14 AFFIDAVIT OF SERVICE

15
16
17 (Name of person who served the documents, the "Affiant") Bonnie Talley

18 _____, states that at all times herein Affiant was and is over 18 years of
19 age, not a party to nor interested in the proceeding in which this affidavit is made.

21 That Affiant has a business or home address of (street,city,state,zip) _____

22 330 So. Casino Center Blvd, Las Vegas, NV 89101

23 That Affiant's telephone number is (____) 671-3957

24
25 That Affiant is not required to be a licensed process server because Affiant is not engaged
26 in business as a process server as defined in NRS 648.014 or Affiant is a licensed process server
27 whose license number is stated below.

That Affiant received a copy of the (list the documents) Order Sharking

Time on the 7th day of Aug, 2014.

That Affiant personally served the (☒ check one) ☒ Plaintiff ☐ Defendant with a copy of the above stated documents on the 7th day Aug, 2014 at about (time) 3:30 a.m. p.m. by:

(check and complete option A or B)

A. ☒ Delivering and leaving the documents with said party at (street address) 330 S. Casino Center Blvd (city) LV, (state) NV, (zip code) 89101.

OR

B. ☐ Delivering and leaving a copy with (first and last name of person that the documents were given to) _____, who is a person of suitable age and discretion that lives with the above state party at (street address) _____ (city) _____, (state) _____, (zip code) _____.

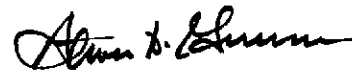
I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Dated: 8-7-2014

Bonnie Polley
Signature of Affiant

Bonnie Polley
Printed Name of Affiant

Process Server License Number
(If you are not a licensed process server write N/A)



CLERK OF THE COURT

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

DISTRICT COURT
CLARK COUNTY, NEVADA

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

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

NOTICE OF APPEARANCE

TO: JENNIFER ELISE GORDON, Defendant in Proper Person.

PLEASE TAKE NOTICE that PETER J. BELLON, ESQ. of BELLON & MANINGO, LTD., will appear as attorney of record for Plaintiff, MATTHEW ROBERT GEIGER, in the above-entitled matter, on August 28, 2014, at 8:30 a.m. to oppose Defendant's Motion.

DATED this 21st day of August 2014.

BELLON & MANINGO, LTD.

By: 

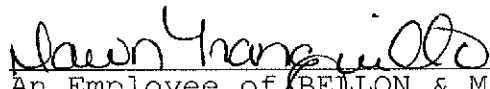
PETER J. BELLON, ESQ.
Nevada Bar No: 004528
732 South Sixth Street, #102
Las Vegas, Nevada 89101
admin@bellonandmaningo.com
Phone: 702/452-6299
Fax: 702/452-6298
Attorney for Plaintiff

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

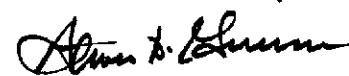
CERTIFICATE OF MAILING

I, do hereby certify that on the 21st day of August 2014, I did deposit a true and correct copy of the NOTICE OF APPEARANCE in the United States Mail, first-class postage prepaid, addressed as follows:

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


An Employee of BELLON & MANINGO, LTD.

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



CLERK OF THE COURT

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

DISTRICT COURT
CLARK COUNTY, NEVADA

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

Case No.: D-10-430639-D
Dept. No.: "T"
FAMILY COURT
Date of Hearing: 8-28-14
Time of Hearing: 8:30am

**OPPOSITION TO DEFENDANT'S MOTION FOR AN ORDER TO SHOW CAUSE AND
FOR ORDERS TO MODIFY CHILD CUSTODY, VISITATION, AND/OR CHILD
SUPPORT AND COUNTERMOTION TO MODIFY CHILD SUPPORT, FOR
ATTORNEY'S FEES AND RELATED RELIEF**

COMES NOW, Plaintiff, MATTHEW ROBERT GEIGER, by and through
his attorney, PETER J. BELLON, ESQ., of BELLON & MANINGO, LTD.,
and files this written response to Defendant's Motion for an Order
to Show Cause and Motion for Orders to Modify Child Custody,
Visitation and Child Support and Countermotion to Modify Child
Support, For Attorney's Fees and Related Relief.

This Opposition and Countermotion are made and based on the
foregoing Points and Authorities, all the papers and pleadings on

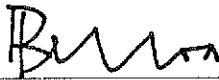
...

...

file with this Court and any oral argument adduced at the time of the hearing in this matter.

DATED this 25th day of August 2014

BELLON & MANINGO, LTD.

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

MEMORANDUM OF POINTS AND AUTHORITIES

I.

STATEMENT OF FACTS AND BACKGROUND

The parties hereto, Plaintiff, MATTHEW ROBERT GEIGER (hereinafter referred to as "MATTHEW"), and Defendant, JENNIFER ELISE GORDON (hereinafter referred to as "JENNIFER"), were divorced on or about September 27, 2011. Unfortunately, they have been before this court numerous times on JENNIFER'S motions since then.

There are two (2) minor children born the issue of said marriage, to-wit: WESTON C. GEIGER, born November 11, 2001 and CHEVY W. GEIGER, born August 11, 2004. Weston is currently twelve (12) years old and Chevy is ten (10). The parties share joint legal custody of their sons and JENNIFER has primary physical

1 custody subject to MATTHEW'S specific rights of visitation.
2 MATTHEW also pays child support of \$1,246.00 per month.

3 MATTHEW does not shy away from the problems that he has had
4 over the past few years. However, he has done everything this
5 court has asked of him and patiently rebuilt his relationship with
6 the boys moving from reunification, supervised visitation and no
7 overnights to unsupervised visitation, overnights and then even
8 more time following the last two (2) hearings in front of this
9 Honorable Court.
10

11 Unfortunately, JENNIFER apparently cannot accept this court's
12 decision to have MATTHEW be a presence in his children's lives and
13 she continues to do everything possible to sabotage that
14 relationship. This includes providing MATTHEW'S Probation Officer
15 with false information through dozens of electronic messages and
16 purposely **lying** to this Court with regard to the statements in her
17 Motion and Order to Show Cause (while counsel usually likes to be
18 safe and use words like embellished or misstated or misrepresented
19 the facts, this case cries out for the blatant allegation of
20 potential perjury).
21

22 As will be discussed below, following two (2) hearings
23 earlier this year in January and May 2014, JENNIFER was not happy
24 with having to share the minor children with MATT as ordered by
25 this Court. Shortly thereafter she began contacting MATT'S new
26 Probation Officer and providing him misinformation and using
27 a misunderstanding to have MATT arrested and incarcerated for
28

1 approximately 23 days in jail until the confusion could be sorted
2 out.

3 When it was, MATT was released and immediately reinstated on
4 his probation despite his new Probation Officer reading dozens of
5 texts/e-mails in Court that JENNIFER had willingly and voluntarily
6 provided in an effort to have MATTHEW'S probation revoked and to
7 send him to prison. Additionally, JENNIFER used this time, which
8 she had so conveniently ensured MATTHEW'S unavailability, to run
9 back to Family Court with more of her lies in yet another effort
10 to take the boys away from their father once again.

11 Further, there are absolutely no existing issues with regard
12 to Chevy's health while in MATTHEW'S care. It is highly unlikely
13 that JENNIFER will be able to produce any such documentation as
14 requested by this Court because this allegation is just another
15 blatant lie by Defendant.

16 The worst that has ever happened while the boys were in his
17 care is that Chevy got car sick and vomited. JENNIFER was
18 immediately notified while they were still on the road and since
19 there was no headache associated with this incident, there was no
20 need to follow up medically based on the doctor's earlier
21 instructions.

22 The truth and the evidence (or the lack thereof by JENNIFER)
23 will clearly show that there is absolutely no basis for the
24 JENNIFER'S ridiculous requested change to sole legal and sole
25 physical custody in this matter. Defendant's Motion and Order to
26

Show Cause should be denied in their entirety and MATTHEW should be awarded attorney's fees and compensatory visitation.

II.

OPPOSITION

Defendant's Request Should be Denied with Legal and Physical Custody Remaining Unchanged at this Time and MATTHEW Being Awarded Compensatory Visitation

This Court has authority to do so pursuant to N.R.S. 125.510(1)(a), which provides as follows:

1. In determining custody of a minor child in an action brought under this chapter, the court may:

(a) During the pendency of the action, at the final hearing or at any time thereafter during the minority of any of the children of the marriage, make such an order for the custody, care, education, maintenance and support of the minor children as appears in their best interest;

With regard to child custody, the Court must apply the "best interests" of the children standard pursuant to N.R.S. 125.480, which provides as follows:

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

2. No preference may be given to either parent for the sole reason that the parent is the mother or the father of the child.

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

(a) To both parents jointly pursuant to N.R.S. 125.490 or to either parent. If the court does not enter an order awarding joint custody of a child after either parent has applied for joint custody, the court shall state in its decision the reason for its denial of the parent's application. When awarding

1 custody to either parent, the court shall consider,
2 among other factors, which parent is more likely to
3 allow the child to have frequent associations and a
4 continuing relationship with the noncustodial parent.

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

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

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

(c) Whether either parent or any other person
seeking custody has engaged in an act of domestic
violence against the child, a parent of the child or any
other person residing with the child. As used in this
paragraph, "domestic violence" means the commission of
any act described in NRS 33.018.

11 There is absolutely no basis to change either custody
12 designation as JENNIFER'S motion is based almost entirely on lies,
13 fabrications and half-truths at best. She has used an unfortunate
14 situation and misunderstanding to conspire to basically strip
15 MATTHEW of his parental rights. Although the unwarranted Order
16 Shortening Time has made it virtually impossible for MATTHEW to
17 procure all the necessary records, all his assertions herein can
18 be backed up by documentation.

20 MATTHEW had been enjoying his unsupervised and increased
21 visitation with his boys until approximately July 26, 2014 when he
22 was arrested on a warrant for not reporting to his Probation
23 Officer. Despite JENNIFER'S first lie in her pleadings, there
24 are/were **NO NEW CHARGES OF ANY KIND** prompting this arrest!!

25 MATTHEW had changed Probation Officers almost a year ago and
26 he was told that he was no longer on monthly reporting. He was
27 told that he only needed to contact them if any of his information
28

1 changed, re: address, phone number, employment, etc. MATTHEW would
2 instead be subject to random visits or contacts from his Probation
3 Office and had to continue to comply with all other requirements.

4 Oddly enough, MATTHEW even left numerous voicemails for his
5 new Probation Officer whenever they would leave a note on his
6 front door over this time period. While there was apparently
7 a warrant out for him, MATTHEW was continuing to communicate with
8 the Probation Department and they were visiting his home, the same
9 one he lived at the entire time and that they could have arrested
10 him at at any time during this period as well?
11

12 For almost nine (9) months MATTHEW carried on just as
13 instructed and continued to live at the same address with same
14 phone number. MATTHEW was always reachable and available and was
15 not "on the run" as JENNIFER would have liked the Officers to
16 believe. It was not until shortly after the May 1, 2014 hearing in
17 front of your Honor and JENNIFER'S anger with that decision that
18 the Probation Department conveniently began to follow up with
19 MATTHEW.
20

21 After MATTHEW was arrested, following her inundating the
22 Department with her allegations, JENNIFER miraculously called his
23 home within minutes of him being taken away. She demanded the
24 return of her children (even though technically she had no legal
25 right to take them on MATT'S time despite his arrest). This is
26 when MATT and his new wife, DEBBIE, first realized that JENNIFER
27 was more involved in this arrest than she lead them to believe.
28

1 Regardless, contrary to JENNIFER'S next lie, DEBBIE returned
2 her call within minutes that morning and agreed to have her pick
3 up the boys. They were returned to her within approximately ninety
4 (90) minutes of this entire incident going down. Yet she tells
5 this Honorable Court that she only found out "through the jail a
6 day later"? Another blatant lie as not only did JENNIFER know that
7 MATTHEW was being arrested before he did, the telephone records
8 will show the truth and the boys know they were returned to their
9 mother that same morning.
10

11 In addition to her lies above as well as about MATTHEW also
12 trying to "abscond", JENNIFER told the Probation Department that
13 MATTHEW had left the state for a "hunting" trip knowing that he
14 was not allowed to possess firearms. In reality, on Father's Day
15 weekend, MATTHEW, the two boys and their paternal Grandfather went
16 on a "fishing" trip with JENNIFER'S knowledge. There were no guns
17 involved and JENNIFER knew this, but that did not stop her from
18 providing false information to the government agency.
19

20 To make matters worse, JENNIFER then tells this Court that
21 MATTHEW violated Legal Custody Provisions by not letting her know
22 he was leaving the state and misleading your Honor perhaps in an
23 attempt to make it look like he was trying to "run" with the
24 children. Both could not be further from the truth. The boys
25 themselves told their mother about the trip as did MATTHEW when
26 they all left directly from JENNIFER'S house after he and Grandpa
27 picked up the boys that day.
28

1 For good measure JENNIFER then throws in that MATTHEW "failed
2 his drug test in Family Courts in 2013"? MATTHEW has no idea what
3 she is talking about as he does not have any recollection of ever
4 failing a drug test for your Honor. Clearly, if that was the case
5 this Court would not have continued to increase his unsupervised
6 time with the minor children. Additionally, to this counsel's
7 knowledge, no recent court orders include any language related to
8 drug testing or other precautionary measures?
9

10 Finally, despite her lies, there was nothing for this court
11 to "be aware of" at the time visitation was increased because
12 there were no "new charges" or "drug issues" of any type! And
13 despite the confusion about MATTHEW reporting to his Probation
14 Officer, which could have been worked out without an arrest **BUT**
15 **FOR** JENNIFER'S involvement, MATTHEW was immediately reinstated on
16 his last year of probation when the truth was discovered. He was
17 released on August 18, 2014 with no penalty of any type for the
18 alleged incident and only a No Contact Order versus JENNIFER. He
19 has successfully completed four (4) out of his five (5) years of
20 probation (noteworthy that he has NEVER tested dirty during all
21 that time either) and apparently the only thing standing in his
22 way of a successful completion is JENNIFER and her continued
23 attempts to sabotage him!!
24

25 With regard to Chevy's medical condition, again it cannot
26 even be said that JENNIFER is being disingenuous when she just
27 outright lies to this Court about this issue as well. Chevy does
28 not have any "severe health risk". JENNIFER has not and cannot

1 produce any medical documentation to this extent (unless of course
2 she lies to the doctor as well) because none exists. While this
3 was considered major surgery, the restrictions on Chevy are not
4 that overwhelming.

5 MATTHEW is informed with regard to the extent of Chevy's
6 medical condition and of his limitations and ensures the child's
7 well being each and every visitation. Oddly enough, MATTHEW is
8 curious about how and to what extent JENNIFER involves Chevy in
9 this "wrestlemania" obsession that she and her new boyfriend (an
10 MMA fighter) force on the boys?

11 There is even an order from the January 16, 2014 hearing
12 requiring MATTHEW to pick up his boys after their "wrestling
13 clinics"? Why does this restriction exist if Chevy is not supposed
14 to be participating in any contact sports? MATTHEW is also
15 concerned with the level of physical contact or punishment in
16 JENNIFER'S household based on what he is led to believe happens
17 there (possible upcoming CPS issue).
18

19 And again, as briefly mentioned above, the one incident that
20 JENNIFER conveniently and mistakenly turns into a life time of
21 medical neglect, was nothing more than car sickness. When it
22 occurred, MATTHEW immediately had Weston call his mother while he
23 attended to Chevy. The child did not complain of or show any signs
24 of a headache and this was yet another NON-INCIDENT that JENNIFER
25 blows out of proportion for her benefit.
26

27 Accordingly, there is no basis to modify either legal or
28 physical custody given the complete lack of veracity in JENNIFER'S

1 allegations. Instead, JENNIFER should be admonished, sanctioned
2 and MATTHEW awarded compensatory time for the days he lost with
3 his children based solely on JENNIFER'S lies and vindictiveness.

4 There Has Been No Prima Facie Showing of a Wilfull
5 Violation of Any Court Order and As Such Defendant's Order
6 to Show Cause Should be Denied

7 Yet again, JENNIFER has been less than honest with the facts
8 surrounding MATTHEW'S trip out of state, his compliance with legal
9 custody provisions and apparently the child support issues being
10 handled throught the District Attorney's Office? Accordingly,
11 there is no prima facie evidence to even suggest the need for a
12 hearing to determine any alleged contempt.

13 First, JENNIFER'S reference to their original Parenting Plan
14 is somewhat erroneous. The provisions that she refers to in her
15 motion address "vacations" on page 4 of the document and not
16 "removing the children from the State" just for the purpose of
17 participating in out-of-state family activities (See, page 5).
18 Although there is no language requiring an itinerary for same (and
19 not even requiring a written itinerary for vacations), MATTHEW
20 still provided JENNIFER with the necessary information before
21 leaving that day.
22

23 As the Court is well aware, Nevada law supports that before
24 any finding of contempt can be made there must be a clear and
25 concise order without ambiguity. Then there must be a willful and
26 knowing violation by the accused party. Certainly this is not the
27 case here on either front even if these provisions somehow applied
28 to MATTHEW'S one fishing trip with the boys.

1 Additionally, the copy of the Parenting Plan provided by
2 JENNIFER is unsigned by this Court and not filed? Further, there
3 is no reference in their 2011 Decree of Divorce to this Plan ever
4 being adopted, incorporated or merged into that court order.
5 JENNIFER has also failed to provide a copy of the alleged order
6 from March 8, 2011 so it is impossible to address that allegation
7 or ensure that the order was filed, noticed and served.

8 Finally, only a Minute Order is provided for the alleged
9 September 2013 order which also appears irrelevant as it clearly
10 applies only to the orders of that particular day. JENNIFER cannot
11 piece together a clear and concise string of orders even if your
12 Honor was to consider that a single Father's Day fishing trip,
13 which notice was provided for, constituted non-compliance with one
14 or more of these possibly conflicting provisions.

15 The same is true with regard to any alleged violation of the
16 legal custody provisions sa they pertain to medical issues.
17 JENNIFER does not make any specific allegation that can be
18 defended. She simply makes a blanket accusation that "Matthew has
19 failed to communicate any happenings"? That in and of itself
20 cannot be the basis of an Order to Show Cause. This is especially
21 true if the Parenting Plan was not sigend and filed as an order.

22 Regardless, the legal custody provisions therein do not
23 require MATTHEW to specifically "communicate every happening" as
24 is alleged. The only appicable provision simply states that "The
25 parents agree to notify the other parent as soon as reasonably
26
27
28

possible of any illness requiring medical attention or any emergency involving the children".

Assuming arguendo that JENNIFER is referring to the car sickness episode, no medical attention was required and no emergency situation occurred. Even so however, MATTHEW contends that phone records will show that Weston called his mother to report the situation from the road. Another blatant lie from Defendant.

It must also be said based on the nature of these medical allegations that JENNIFER does not enter this matter with clean hands, far from it. In the summer of 2013 JENNIFER arranged for and scheduled Chevy's **BRAIN SURGERY** without even consulting MATTHEW and therefore without his knowledge and consent.

MATTHEW discovered the surgery by accident when his insurance company contacted him about it. JENNIFER had apparently told or provided the hospital with documentation that MATTHEW had NO RIGHTS with regard to Chevy. If this is not the proverbial pot calling the kettle black than counsel just does not understand that expression!

And concerning the last of the alleged violations by MATTHEW, JENNIFER appears to be making the assumption that if MATTHEW informs the DA'S Office of a change in circumstance pursuant to Nevada law (re: a 20% change in income) that he is somehow in violation of some order somewhere?

Exhibit "3" attached to Defendant's Notice of Motion For An Order to Show Cause clearly shows that THEY filed the motion to

1 Modify, not MATTHEW. The DA'S Office is now handling the child
2 support matter and are following their protocol. In reality,
3 MATTHEW has followed court orders by including a Countermotion
4 below to address his child support obligation regardless of what
5 happens on August 26th, the date set for the hearing in the "R"
6 case.

7
8 **III.**

9 **COUNTERMOTION**

10 **Modification of MATTHEW'S Child Support Obligation**

11 This Court has authority to award/modify child support
12 pursuant to NRS 125B.070 which states, in pertinent part:

13 1. As used in this section and NRS 125B.080, unless
14 the context otherwise requires:

15 (a) "Gross monthly income" means the total amount
16 of income received each month from any source of a
17 person who is not self-employed or the gross income from
18 any source of a self-employed person, after deduction of
19 all legitimate business expenses, but without deduction
for personal income taxes, contributions for retirement
benefits, contributions to a pension or for any other
personal expenses.

20 (b) "Obligation for support" means the sum certain
21 dollar amount determined according to the following
schedule:

- 22
23 (1) For one child, 18 percent;
(2) For two children, 25 percent;

24 . . . but not more than the presumptive maximum amount
25 per month per child set forth for the parent in
26 subsection 2 for an obligation for support determined
27 pursuant to subparagraphs (1) to (4), inclusive, unless
the court sets forth findings of fact as to the basis
for a different amount pursuant to subsection 6 of NRS
125B.080.

28 . . .

1 NRS 125B.080 also states:

2
3 1. A court of this state shall apply the appropriate
4 formula set forth in NRS 125B.070 to:

5 (a) Determine the required support in any case
6 involving the support of children.

7 (b) Any request filed after July 1, 1987, to change
8 the amount of the required support of children.

9
10 2. If the parties agree as to the amount of support
11 required, the parties shall certify that the amount of
12 support is consistent with the appropriate formula set
13 forth in NRS 125B.070. If the amount of support deviates
14 from the formula, the parties must stipulate sufficient
15 facts in accordance with subsection 9 which justify the
16 deviation to the court, and the court shall make a
17 written finding thereon. Any inaccuracy or falsification
18 of financial information which results in an
19 inappropriate award of support is grounds for a motion
20 to modify or adjust the award.

21 3. If the parties disagree as to the amount of the
22 gross monthly income of either party, the court shall
23 determine the amount and may direct either party to
24 furnish financial information or other records,
25 including income tax returns for the preceding 3 years.
26 Once a court has established an obligation for support
27 by reference to a formula set forth in NRS 125B.070, any
28 subsequent modification or adjustment of that support,
except for any modification or adjustment made pursuant
to subsection 3 of NRS 125B.070 or NRS 425.450 or as a
result of a review conducted pursuant to subsection 1 of
NRS 125B.145, must be based upon changed circumstances.

4. Notwithstanding the formulas set forth in NRS
125B.070, the minimum amount of support that may be
awarded by a court in any case is \$100 per month per
child, unless the court makes a written finding that the
obligor is unable to pay the minimum amount. Willful
underemployment or unemployment is not a sufficient
cause to deviate from the awarding of at least the
minimum amount.

5. It is presumed that the basic needs of a child are
met by the formulas set forth in NRS 125B.070. This
presumption may be rebutted by evidence proving that the
needs of a particular child are not met by the
applicable formula.

1
2 6. If the amount of the awarded support for a child is
3 greater or less than the amount which would be
4 established under the applicable formula, the court
5 shall:

6 (a) Set forth findings of fact as to the basis for
7 the deviation from the formula; and

8 (b) Provide in the findings of fact the amount of
9 support that would have been established under the
10 applicable formula.

11 7. Expenses for health care which are not reimbursed,
12 including expenses for medical, surgical, dental,
13 orthodontic and optical expenses, must be borne equally
14 by both parents in the absence of extraordinary
15 circumstances.

16 8. If a parent who has an obligation for support is
17 willfully underemployed or unemployed to avoid an
18 obligation for support of a child, that obligation must
19 be based upon the parent's true potential earning
20 capacity.

21 9. The court shall consider the following factors when
22 adjusting the amount of support of a child upon specific
23 findings of fact:

24
25 (f) The value of services contributed by either parent;

26
27 (j) The amount of time the child spends with each
28 parent;

(k) Any other necessary expenses for the benefit of
the child; and

(l) The relative income of both parents.

20 In September 2013 this Court ordered that MATTHEW was to pay
21 JENNIFER \$1,246.00 per month as and for child support based on his
22 earlier reported earnings from employment. Since that time MATTHEW
23 has suffered an injury and was placed on Workman's Compensation.
24 The DA'S Office continued to collect child support with regard to
25 the current order until MATTHEW'S benefits ran out recently.

26 Accordingly, MATTHEW reported this change in circumstance to
27 the District Attorney's Office and they placed the matter on
28

1 calendar to address it. That hearing is scheduled for August 26,
2 2014, two days prior to the expedited hearing in this matter.
3 MATTHEW wanted to be sure however to comply with your Honor's Order
4 that the issue of child support would be addressed through
5 Department "T" so he included this requested relief herein.

6 Through no fault of his own MATTHEW now has no monthly
7 income. While that is subject to change down the road based on his
8 recovery and may even result in back pay that could qualify as
9 income for the purpose of back child support, he simply does not
10 have the funds each month to continue to pay JENNIFER \$1,246.00. He
11 is currently surviving by utilizing the small savings he possessed,
12 selling whatever assets possible and through the kindness of
13 others.
14

15 Pursuant to Nevada law MATTHEW respectfully requests that his
16 child support obligation be temporarily modified and reduced to
17 \$100.00 per child per month for a total of \$200.00 each month in
18 accordance with N.R.S.125B.070 and N.R.S.125B.080. Such modified
19 support should continue until MATTHEW is reinstated and eligible
20 for employment through the Iron Worker's Union.
21

22 **IV.**

23 **ATTORNEY'S FEES AND SANCTIONS**

24 Lastly, this Court has the authority to make an award of
25 reasonable attorney's fees to MATTHEW pursuant to the following
26 statutes:

27 **N.R.S. 125B.140(5)(b)** provides that:
28

5. The court shall determine and include in its Order:

(b) A reasonable attorney's fee for the proceeding, unless the court finds that the responsible parent would experience an undue hardship if required to pay such amounts. Interest continues to accrue on the amount ordered until it is paid . . .

E.D.C.R. 5.11 provides that:

(a) Before any family division motion is filed, unless the motion is filed and served on the non-movant at the same time the complaint is filed and served, the movant must diligently attempt to contact and communicate with the other party's counsel, or that party if unrepresented, in an attempt to resolve the issue or issues in dispute without the necessity of filing a motion. Failure to comply with this provision may result in sanctions being imposed against the movant and an award of attorney's fees and costs to the non-movant if the issues could have, in the opinion of the court, been resolved if the movant had diligently attempted to resolve the issues without filing a motion.

(b) If the movant contacts and communicates with the non-movant's counsel, or that party if unrepresented, in advance of filing the motion with an intent to resolve the issue or issues in dispute without the necessity of filing a motion and the non-moving party does not, in the opinion of the court, diligently attempt to resolve the dispute in good faith, the court may impose sanctions against the non-movant and award attorney's fees and costs to the moving party.

MATTHEW has attempted to be a significant part of his children's lives, but JENNIFER has thwarted that effort at every turn by conspiring to have him wrongly incarcerated, lying to this Court and withholding visitation while again forcing this matter into litigation without any effort to resolve the issues amicably.

JENNIFER has definitely not acted in good faith nor has she protected the best interest of the minor children. To the contrary, JENNIFER is looking out for her and her new family and

1 does not want MATTHEW to be any part of their lives. Her actions
2 may even rise to the level of perjury given her outright lies
3 under oath in her Affidavit signed and sworn August 4, 2014.

4 MATTHEW on the other hand has continued to progress, attended
5 the required parenting classes, participated in the reunification
6 process, obeyed court orders and has always been willing to put
7 the children first and forego continued court intervention. The
8 same can definitely not be said of JENNIFER

9 Accordingly, an award of attorney's fees in the amount of
10 \$3,500.00 should be made to Plaintiff and Defendant should be
11 sanctioned as deemed proper by this Honorable Court.

12 Conclusion

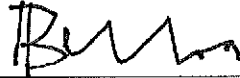
13 In light of the foregoing, Plaintiff, MATTHEW ROBERT
14 GEIGER respectfully requests that the Court grant the following
15 relief:

- 16 1. An Order denying Defendant's Motion in its' entirety;
- 17 2. An Order denying Defendant's Order to Show Cause in its'
- 18 entirety;
- 19 3. An Order maintaining joint legal custody and primary
- 20 physical custody with JENNIFER for the time being;
- 21 4. An Order modifying and reducing Plaintiff's child
- 22 support obligation to \$200.00 per month;
- 23 5. Appropriate sanctions against Defendant for the filing
- 24 of her frivolous motion and for her dishonesty with this Court;
- 25 6. An award of attorney's fees in the amount no less than
- 26 \$3,500.00; and
- 27
- 28

1 7. For any other relief deemed appropriate by this Court.

2 Dated this 25th day of August 2014

3 BELLON & MANINGO, LTD.

4
5 

6 PETER J. BELLON, ESQ.
7 Nevada Bar No. 004528
8 732 South Sixth Street, Suite 102
9 Las Vegas, Nevada 89101
10 admin@bellonandmaningo.com
11 Phone: (702) 452-6299
12 Fax: (702) 452-6298
13 Attorney for Plaintiff
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AFFIDAVIT OF MATTHEW ROBERT GEIGER

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

MATTHEW ROBERT GEIGER, being first dully sworn, deposes and states:

1. That I am the Plaintiff the above-captioned matter and as such have personal knowledge of the facts as stated in my above Opposition and Countermotion and can testify to said facts if called upon to do so.

2. That I have read and am familiar with my OPPOSITION AND COUNTERMOTION herein.

3. That the statements contained in my Points and Authorities are true to the best of my knowledge, except for those matters stated based upon information and belief, and as to those matters I believe them to be true.

4. That I will not reiterate all of the statements made in my points and authorities in this affidavit. However, I do


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1 specifically incorporate those statements, as if they were set
2 forth in full herein.

3 FURTHER YOUR AFFIANT SAYETH NAUGHT.

4
5
6 
MATTHEW ROBERT GEIGER

7 SUBSCRIBED and SWORN to before
8
9 me this 25th day of August 2014.

10
11 
12 NOTARY PUBLIC



DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Matthew Robert Geiger
Plaintiff/Petitioner

-vs-

Jennifer Elise Geiger
Defendant/Respondent

CASE NO. D-10-430631-DDEPT. "T"

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

Party Filing Motion/Opposition: ☒ Plaintiff/Petitioner ☐ Defendant/Respondent

MOTION FOR/OPPOSITION TO motion for Order to Show Cause

Notice

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)

Excluded Motions/Oppositions

- ☐ Motions filed before final Divorce/Custody Decree entered
(Divorce/Custody Decree NOT final)
- ☐ Child Support Modification ONLY
- ☐ Motion/Opposition For Reconsideration (Within 10 days of Decree)
Date of Last Order _____
- ☐ Request for New Trial (Within 10 days of Decree)
Date of Last Order _____
- ☐ Other Excluded Motion _____
(Must be prepared to defend exclusion to Judge)

NOTE: If no boxes are checked, filing fee MUST be paid.

☒ Motion/Opp IS subject to \$25.00 filing fee ☐ Motion/Opp IS NOT subject to filing fee

Date: August 25, 2014

Peter J. Bellon Esq.
Printed Name of Preparer

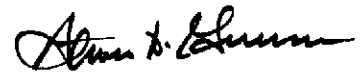
P. Bellon
Signature of Preparer

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

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CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

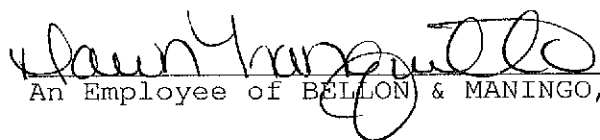
MATTHEW ROBERT GEIGER,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: D-10-430639-D
)	Dept. No.: "T"
JENNIFER ELISE GORDON,)	FAMILY COURT
)	
Defendant)	

CERTIFICATE OF SERVICE

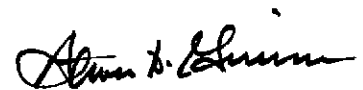
TO: JENNIFER ELISE GORDON, Defendant in Proper Person.

I, do hereby certify on the 25th day of August, 2014, I did serve a true and correct copy of the Plaintiff's OPPOSITION TO DEFENDANT'S MOTION FOR AN ORDER TO SHOW CAUSE AND FOR ORDERS TO MODIFY CHILD CUSTODY, VISITATION, AND/OR CHILD SUPPORT AND COUNTERMOTION TO MODIFY CHILD SUPPORT, FOR ATTORNEY'S FEES AND RELATED RELIEF and FINANCIAL DISCLOSURE FORM by electronic mail and by depositing a copy in the United States Mail, first-class postage prepaid, addressed as follows:

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



An Employee of BELLON & MANINGO, LTD.



CLERK OF THE COURT

**DISTRICT COURT
CLARK COUNTY, NEVADA**

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

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

ORDER SETTING EVIDENTIARY HEARING

**PRE-Trial Memorandum DUE: September 26, 2014
HEARING DATE: October 03, 2014**

IT IS HEREBY ORDERED that the above-entitled case is set for an Evidentiary Hearing in Department T on **October 03, 2014, at the hour of 9:00 AM** for a period of **1/2 (one half) day** at the Family Courts & Services Center, 601 N. Pecos Road, Las Vegas, Nevada, 89101 in courtroom #5. If this matter settles, please advise the Court as soon as possible.

IT IS FURTHER ORDERED that a Pre-Trial Memorandum be filed on or before **September 26, 2014**. 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-Trial Memorandum 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 to file and exchange the Pre-Trial Memorandum on the designated date shall result in sanctions. Said sanctions may include striking the Complaint or Answer/Counterclaim, vacating the trial date, or monetary sanctions.

IT IS FURTHER ORDERED that all discovery shall be completed no later than September 19, 2014. All witnesses should be immediately identified and Initial Witness Lists shall be filed and exchanged immediately and can be supplemented thereafter. Any and all Tabbed Exhibits must be delivered to chambers no later than one week prior to Evidentiary Hearing.

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

DATED: This 5th day of September, 2014.


Gayle Nathan
GAYLE NATHAN
District Court Judge
Department T

CERTIFICATE OF MAILING

I hereby certify that I caused on or about the above file stamped date, a copy of the attached **Order Setting Evidentiary Hearing** to be mailed postage prepaid to the following person or persons at their last known address:

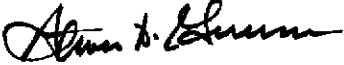
PETER J. BELLON, ESQ.
732 S. Sixth St. #102
Las Vegas, NV 89101

Jennifer Elise Gordon
CONFIDENTIAL

By: 
Marie Choudhry
Judicial Executive Assistant
Department T

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CLERK OF THE COURT

RPLY

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

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

MATTHEW GEIGER

Plaintiff,

vs.

JENNIFER GORDON,

Defendant.

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

Hearing Date: October 3, 2014
Hearing Time: 9 :00 a.m.

REPLY TO OPPOSITION AND OPPOSITION TO COUNTERMOTION

COMES NOW, Defendant, JENNIFER GORDON, appearing in proper person, and responds to the Plaintiff's Opposition and Countermotion. This Reply is based upon all the records and files in this action, exhibits, and any argument adduced at the time of hearing of this Motion.

I.

FACTS AND ARGUMENT

By reading the opposition, it is very clear that Matthew has failed to disclose, yet again, the happenings/findings of this court. It makes it clear that Mr. Bellon, with all due respect, has no clue about what's going on here and the true history of this case. That being said I would like to address just a few main topics from his opposition.

1 Our return to this court, on May 7, 2013, was not because of Jennifer's "numerous"
2 motions, as Mr. Bellon stated, but because Matthew filed a motion alleging Jennifer had
3 refused him visitation. This was a blatant lie on Matthews part considering he never showed
4 up for any of his visitations, and the courts made note of that On May 7th. Also that day,
5 Matthew FINALLY submitted his long, overdue, court ordered, Psychological evaluation (see
6 Motion for Orders to Modify Custody, Visitation and/or Child Support). Although, through
7 documentation, we have shown that he was not truthful with his psychologist. This was a fact
8 that Jennifer, again, submitted to the courts in her most recent motion. This is also the one
9 thing that Mr. Bellon did NOT refute in his lengthy opposition. It took Matthew almost 3
10 years, and multiple court orders, for him to comply. The Courts findings on May 27, 2011
11 were "father is NOW under an ORDER TO SHOW CAUSE as to the psychological
12 evaluation, which was ordered back on 12/14/10. COURT FINDS, plaintiff in CONTEMPT
13 for not complying with this Order after being before the Court numerous times since the
14 evaluation was Ordered." It was then ordered and filed September 27, 2011. Attached as
15 **Exhibit 1** is the Minutes from May 27, 2011. Attached as **Exhibit 2** is the Decree of Divorce
16 filed September 27, 2011.

20 Since then, everything except the current Motion filed by Jennifer, and the OSC in
21 February, all of the multiple hearings have been status checks to continue updating the courts
22 on the progress with visitation, and the reunification. Mr. Bellon has stated that Matthew pays
23 child support in the amount of \$1246 per month, however, Matthew has not EVER maintained
24 his child support, which dates back to November 1, 2010. Jennifer has notified the courts, at
25 almost every hearing since the initial date, that there has been a problem. Because of the
26 multiple issues, the courts asked Matthew to produce his tax returns on May 7, 2013.
27
28

1 Periodically, when the child support division could locate his place of employment, his wages
2 would be garnished... yet it was rarely for the correct amount. Matthew never made up the
3 difference. Matthew also never reported to the courts he was working, or to Jennifer. Instead
4 he made excuses, at each hearing, regarding his trouble with his employment. Matthew was
5 ordered 4 times to report his income, pursuant to the following file dates: as reflected in the
6 minutes from the hearing which occurred on November 1, 2010, December 29, 2010, March
7 8, 2011, and September 27, 2011, yet he never complied. Attached as **Exhibit 3** are the
8 aforementioned Orders. Matthew showed up empty-handed again on May 7, 2013, leading
9 the courts to ask for Matthew to submit his tax returns by May 21, 2013 and continued the
10 hearing until that date, at which time Matthew again showed up without providing what the
11 Court Ordered (See Order from the May 7, 2013 hearing file stamped on May 29, 2013).
12 Attached as **Exhibit 4** is the Order filed May 29, 2013. Once again Matthew came to court
13 without anything but another excuse as to why he had not produced what the courts had asked.
14 At the time, Jennifer's attorney argued that Matthew's drug test and tax returns were the sole
15 reason for this hearing, and she asked for attorneys fees which was not ruled upon. It took till
16 September 3, 2013 for the courts to finally have and review Matthews tax returns, so an
17 adjustment could be made. The court found that, pursuant to file date: September 16, 2013;
18 "The Court having reviewed the Plaintiffs 2012 tax returns FINDS that the plaintiff failed to
19 notify Defendant of his employment". Attached as **Exhibit 5** is the Order filed September 16,
20 2013. Because of all the problems and Matthew's failure to follow the orders, the Court also
21 made an order that day that "Absent a stipulation between the parties there shall be no
22 modification to the Order without a petition for same to Department T." See Jennifer's
23 Motion for Order to Show Cause and the attached Exhibits. Matthew has still continued to
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1 ignore these orders. The only payments that have been made for child support have been
2 garnished, and most of them have not totaled the amounts owed on a monthly basis. Matthew
3 still to this day, has never notified Jennifer of ANY of his employment.

4 The most recent payment of child support was made on July 31, 2014, while Matthew
5 was incarcerated, and was for \$1246. This was the ONLY payment ever made without a wage
6 garnishment. Attached as **Exhibit 6** is the Schedule of Arrearages, Financial Transaction
7 History and Verification Forms. The sole reason for that specific payment was because the
8 child support division was going to suspend Matthews drivers license on July 31 for non-
9 payment. Matthew was also under advisement that he would be held in contempt if he did not
10 make a payment. And, instead of coming back to the family courts to file for a modification,
11 Matthew attempted to file for a modification through the child support division on July 19,
12 2014. The Hearing Master later vacated the hearing set for August 26, 2014 when they pulled
13 up the current family court orders. Matthew again was trying to go around the courts orders.
14 While Mr. Bellon states that Jennifer's accusations regarding the child support division are
15 false, the child support division did in fact issue an "Order to Show Cause why respondent
16 should not be found in contempt and order appointing child support master". It is scheduled
17 for October 27, 2014 at 1:45pm. Attached as **Exhibit 7** is the child support's division Order
18 to Show Cause.

19 Jennifer has always wanted Matthew to be a part of the children's lives, but in a
20 healthy manner. Matthew's checkered past and the current information Jennifer became
21 aware of, has Jennifer worried about the children. There is so much history to this case with
22 regards to Matthew's health and well being, and his issues with law enforcement. When
23 Jennifer learned of Matthew's possible active warrant in June 2014, she immediately became
24

1 deeply concerned about the children being under his care. Jennifer was concerned that should
2 Matthew get stopped by the police for any reason, even an unrelated reason such as a traffic
3 violation, they might find out that he has a warrant and take him into custody. This is a real
4 concern should he have the children in his care. What if they could not get a hold of Jennifer?
5 Where would the children be taken? The problem is compounded by the fact of Chevy's
6 health problems. Anyway, after receiving the phone call looking for Matthew, Jennifer
7 immediately looked up and called the probation office. They told her to contact Norma
8 Medina for information on Matthew and they confirmed that he did indeed have an active
9 warrant. Jennifer left a voicemail for Norma and later received a call back. Jennifer explained
10 to Norma her concerns of Matthew's warrant. She explained that Matthew had recently been
11 granted visitations again with the children. Jennifer informed Norma that she was worried
12 about Matthew being arrested while the children were in his care. Jennifer gave Norma the
13 current visitation schedule to avoid the boy's involvement if Matthew was found. Norma did
14 ask for Jennifer's address but Jennifer stated that she did not want any police at her door
15 looking for Matt during an exchange. That she stated she did not want the boys to see their
16 dad go to jail. Norma informed Jennifer that she would note her concerns for the children.

20 During their conversation Jennifer was asked about the whereabouts of Matthew.
21 Norma asked if the address they had on file was correct. Jennifer confirmed that it was correct
22 minus the apartment number. Jennifer told her that she didn't know where Matthew was
23 except for when they exchanged the children. She also informed Norma that she knew that he
24 sometimes travels to Fulsom, California because his wife has a house there. Norma informed
25 Jennifer that Matthew is not allowed to leave the State of Nevada. Jennifer answered some
26 additional questions about what had transpired in court over the last year, and again explained
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28

1 how worried she was finding all this out. Jennifer left the phone call extremely worried about
2 the boys. Norma said she would keep Jennifer updated, but never did. She also told Jennifer
3 that Metro had been looking for Matthew for 9 months already.

4 There was no further contact over the next month while Jennifer and the children were
5 visiting family in Kansas. Jennifer returned from Kansas on July 20 and the boys left for a
6 visitation with Matthew the very next day to conclude on July 31. Weston was to start a band
7 camp on the 28th so on the 27th Jennifer sent a text asking to talk to the boys. She wanted to
8 remind Weston of everything he was supposed to bring. Within a few minutes of sending that
9 text Jennifer received a phone call from a friend asking if they were still in Kansas and if the
10 boys were with her. When Jennifer said no, she was informed that Matthew had been arrested
11 sometime the day before. Jennifer became upset and concerned as the children were with
12 Matthew. Attached as **Exhibit 8** is the phone records reflecting these phone calls and text.
13

14 To get to the bottom of the matter, Jennifer started calling everybody looking for the
15 boys. She left messages on Matt's parents phone, his dad's cell, mom's cell and Matt's wife's
16 cell. Matthew's father immediately called Jennifer back and said he did not know that
17 Matthew was arrested but that the boys were with Debbie. Jennifer even called a friend that
18 works at CCDC and asked him if Matthew was really there. He confirmed that he was, then
19 personally asked Matthew himself where the boys were. He said all Matthew would say is
20 that they were with family.
21

22 After Jennifer had to leave a voicemail to Matt's wife threatening to involve the police,
23 Matthews wife Debbie finally returned Jennifer's call. She told Jennifer that the boys did not
24 know anything and they just thought their dad had left to work the day before. Jennifer
25 immediately drove to their house to pick up the boys. Once the boys were in the car Jennifer
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1 and Baron started to tell the boys that they had to come get them because their dad was gonna
2 be gone for work for awhile but both boys said they already knew that dad was in jail for
3 probation...although they didn't understand what probation was. Jennifer asked them where
4 they had heard that and they replied that Debbie had just told them and that's why they had to
5 leave.
6

7 The very first contact Jennifer EVER had with Matthew's probation officer was on
8 August 14, 2014...two full weeks AFTER Matthew had been incarcerated. After Jennifer
9 picked up the children, sometime later she again spoke to Norma Medina to let her know
10 what had happened. Norma then informed Jennifer that she was not a probation officer but
11 worked in the state office on cases looking for absconded probationers. She gave Jennifer
12 Matthew's probation officer's name and telephone number. The very first contact Jennifer
13 EVER had with Matthew's probation officer was on August 14, 2014, at which time Matthew
14 was already back in jail for two weeks. She called the officer ONLY to get an update on
15 Matthew's probation so she could update the family courts. Officer LaPutt and Jennifer then
16 discussed Matthew's history and Jennifer's concerns for the children. Officer LaPutt asked
17 Jennifer if she had anything showing that Matthew had left the state. Jennifer told him all she
18 had was text conversations. Officer LaPutt then asked if she would be willing to give him
19 copies of those and Jennifer said yes. Jennifer also told Officer LaPutt much of what had
20 transpired in court while Matthew during the time that Matthew was violating his probation
21 requirements, like his drug test and request for hunter safety courses, all that was noted in
22 family courts.
23

24 On August 18, 2014, Jennifer met Officer LaPutt at the probation office and handed
25 him the 5 text messages pertaining to Matthew being in California, and the Jennifer's
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1 concerned text to Matthew about him leaving to Utah without her knowing. NOTHING that
2 was discussed with probation was ever false information, as Mr. Bellon stated. Everything
3 was documented regarding the safety of the children because of Matthew's scary past and his
4 issues with following the law. Mr. Bellon's accusations are completely false and
5 undocumented.
6

7 Matthew was arrested for failing to report for 10 months and was held until they could
8 schedule a court date. There was no confusion. Jennifer DID NOT contact Officer LaPutt
9 until 2 weeks AFTER Matthews arrest. Jennifer is in no way at fault or the cause for
10 Matthew's warrant or arrest. Although Mr. Bellon states the contrary, once again Matthew
11 has provided no documentation to support his stories. Jennifer has not only submitted phone
12 records PROVING that Matthews claims are quite the opposite, but she has also provide the
13 court with Matthew's probation conditions, when his bench warrant was issued, AND all other
14 orders showing Matthew's repeated failure to not only comply with the orders of this court,
15 but his consistent perjury under oath. See Jennifer's Motion for Orders to Modify Child
16 Custody, Visitation and/or Child Support and the attached Exhibits.
17
18

19 Mr. Bellon states that the "Order Shortening Time made it virtually impossible for
20 Matthew to procure all the necessary records", but the history of this court clearly shows that
21 Matthew has not ever provided any type of documentation in the 4 years of this case to back
22 up any of his allegations. It is a repetitive excuse played out by Matthew time and time again.
23 Mr. Bellon stated that Jennifer lied when she claimed there were new charges prompting
24 Matthew's arrest. Jennifer was not lying when she wrote that. Is a probation violation which
25 in turn issues a warrant for your arrest, not a new charge? If it is, then Jennifer asks for her
26 mistake to be excused as she does not understand the finer points of the law in this regard. To
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1 her, it is a new charge, one she thinks would be called "probation violation". If Matthew had
2 been following his probation then there would never have been a violation filed and a warrant
3 issued. Jennifer had nothing to do with any of that, and never even spoke with any officers
4 prior to Matthews arrest, unlike what Mr. Bellon claims. However, it seems curious as to why
5 Matthew has not informed the Court at earlier hearings that he was skipping out on his
6 probation, and that there was a warrant for his arrest.
7

8 Mr. Bellon has also claimed that Jennifer has shown anger with your Honor's decision,
9 specifically regarding the May1, 2014 hearing. HOWEVER, court review of video from that
10 hearing and MANY others as well, will show that Jennifer has always sat quietly in her chair,
11 but Matthew has consistently thrown fit after fit and has been escorted out by the bailiff on
12 many occasions.
13

14 Mr. Bellon's allegations regarding Jennifer's communications couldn't be further from
15 the truth. Matthew has expressed many times in court that he wants to take the boys hunting
16 and enroll them in safety classes. It was recently referred to in the May 1, 2014 hearing as
17 reflected in the minutes. If Matthew is not to be in possession of firearms as Mr. Bellon has
18 stated, then how come Matthew is openly talking about it in court? Certainly Matthew didn't
19 inform the Court regarding the restriction over him regarding firearms. And, why are the boys
20 telling stories about shooting with their dad and hunting trips? So, Matthew willingly and
21 knowingly violates his probation terms but wants to blame it on Jennifer? What sense does
22 that make?
23
24

25 Regarding his trip to Utah with the boys, another probation violation, Matthew has not
26 ever provided any type of documentation or itinerary or even spoke of his plans to take the
27 boys to Utah. He claims that his father was present, but his father has not ever been present
28

1 for any of the boy's scheduled visitation pick ups from Jennifer's house. All communications
2 are done through text messaging because this is not the first time Matthew has claimed he
3 informed Jennifer of plans that he truly did not. The courts have made repeated orders of this
4 because of Matthew doing as he pleases. Besides the previously entered agreements in the
5 initial 'partial parenting plan' filed in open court on November 1, 2010, under VACATION,
6 "they shall be allowed to have the children during respective vacations, WITH FOURTEEN
7 DAYS ADVANCE NOTICE TO THE OTHER PARENT. The parents agree that prior to
8 leaving for vacation they will provide each other with a TRAVEL ITINERARY to include
9 dates of travel, destination, location, and telephone number where the children can be
10 reached." Then under SPECIAL PROVISIONS it says " the parents agree to share itinerary
11 information when traveling out-of-state, to include dates of travel, destination, and an
12 emergency contact number". Attached as **Exhibit 9** is the file-stamped Partial Parenting
13 Agreement. It was further ordered and filed on December 29, 2010 "Parties shall
14 COMMUNICATE through electronic mail or text messaging" (as shown by **Exhibit 3**); then
15 on March 8, 2011 (as shown by **Exhibit 3**), because Matthew had left the state with the boys
16 without Jennifer's knowledge and then also failed to return them, the court ordered the
17 following: "Neither parent may take children Out Of State until further Order of this court"...
18 Last but not least, exchanging itineraries was discussed in great detail at the hearing on May 1,
19 2014.

20
21 In regards to Matthew's drug test, we asked the courts to ask Matthew to submit for a
22 drug test on May 7, 2013 because of his past substance abuse and because of the lies he told in
23 his psychologist during his evaluation. Jennifer requested and paid for that test. It was
24 ordered and filed on May 29, 2013. The return hearing for his drug test results and tax returns
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1 was on May 21, 2013 (see **Exhibit 4**). The test revealed that he had not passed because the
2 results showed positive for methadone and THC, therefore it is considered a FAILED drug
3 test. Matthew did show the court some type of prescriptions for the drugs. Jennifer stated her
4 concerns that those drugs were the same ones Matthew had a substance abuse problem with.
5 How does he have prescriptions for the same drugs that he abusing at a prior time? The drug
6 use is a SERIOUS issue with this case, as it was the basis for the initial TPO orders, loss of
7 custody and multiple house calls by the police in the past.

9 Reality about who has not been happy with the Court's orders is that it has been
10 Matthew who has not been happy with any of the orders of this court past or present. He has
11 made that clear through his numerous attorneys, as he continuously brings up matters that
12 have been addresscd MULTIPLE times by this court. Isn't this an issue of res "judicata"?
13 Why must I address these issues, even defend myself against his same claims, over and over
14 again. I heard that Nevada has a case called McMonigle that stands for the premise that the
15 Court will not go over the same issues once they've been decided. But, once again Matthew is
16 griping about "wrestlemania" and Jennifer "new boyfriend". However, Matthew might
17 flippanly call it "wrestlemania", but the fact is the sport of wrestling is much different than
18 the WWE version of wrestlemania. Wrestling is a legitimate youth club sport, high school
19 sport, and college sport, and Olympic sport. USA Wrestling is the governing body of the
20 largest youth wrestling club program, but they are not the only large organization as they
21 compete with NUWAY and AAU. The sport has participation by both men and women and
22 our local league, the Southern Nevada Wrestling Association is a member of USA Wrestling
23 and has well over twenty teams participating with a membership of over 600 kids of age from
24 kindergarten to the eighth grade. The courts are well aware that Baron, aka 'Matsy' is not a
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1 new boyfriend but has indeed been with Jennifer for 4 years now. He is not, nor has he ever
2 been, an MMA fighter, although he did wrestle at the youth level and in high school, as did his
3 brother and as does his son who is presently a varsity starter on the Foothills High School
4 Wrestling Team. Matthew first complained these same things back on December 14, 2010, as
5 reflected in the court minutes (attached as **Exhibit 10**), and complained about the wrestling
6 program that Jennifer had enrolled the boys in because Baron is a youth coach. Matthew even
7 went a step further and filed a CPS report, regarding all of the above matters, in January 2011.
8 The courts, not knowing whom to believe, ordered that the boys be enrolled in counseling,
9 ordered and filed December 29, 2010 (see **Exhibit 3**). Upon the return hearing on March 8,
10 2011 (see **Exhibit 3**), Matthew had not made any communication regarding the children's
11 counseling, as previously ordered, therefore Jennifer had been unable to start their therapy.
12 The courts ordered "mother has AUTHORITY to choose Counselor for children as previously
13 ordered". Because the therapy had not begun the court also ordered to interview the children
14 herself.

15 Jennifer immediately enrolled the boys in therapy and they started 2 days following the
16 hearing. Upon the return hearing held on March 29, 2011 to discuss the court interview with
17 the children, Matthew did not even show up. Going off what the children had discussed with
18 the court, the court ordered several things regarding Baron, discipline, and wrestling. Jennifer
19 argued that the children were being coached and alienated by Matthew, and that Matthew and
20 his mother had both filed CPS reports regarding all the allegations Matthew was claiming.
21 The Courts advised that they would obtain and CPS records and do an in camera inspection.
22 Jennifer immediately pulled the boys from their wrestling program with Las Vegas Jr.
23 Wildcats. Attached as **Exhibit 11** is the minutes that were adopted as the Order from the
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1 hearing of March 29, 2011. On May 17, 2011, we had a return hearing to review psych
2 eval/counseling/child interview and parenting class. Ms. Conant updated the courts on her
3 visit to Jennifer's home and her dinner date with Jennifer and the boys. She also disclosed
4 that on 5 different occasions she had tried but could not reach Matthew. She also notified the
5 courts that she had received the boy's medical records from their therapist. The courts advised
6 "she has reviewed the CPS records from a January 2011 investigation and the allegations have
7 been found to be UNSUBSTANTIATED." Jennifer once again discussed the boy's decisions
8 regarding their sports. She was advised that through their therapy, and if they expressed they
9 wanted to in the future, that we work it out with the therapist.
10

11
12 The boys both resumed wrestling in January 2012 with Green Valley youth wrestling
13 program. They were excited to be back in the room. Both boys took home state medals that
14 season but sadly, after having a scan done of Chevy's brain fluid flow (called CSF), his
15 neurosurgeon said he could no longer participate in any full contact sport. The state
16 tournament that year, which had already take place, was Chevy's last matches. Weston has
17 continued to reach new achievements since then. Since they, Weston has continued to
18 improve on the mat beating kids that have more years experience than he does. Wrestling has
19 become a very important part of his life and he has been very successful without the negativity
20 in his ear, until recently.
21

22
23 Since Matthew received his visitations back the problems have started again. Even
24 though Matthew has been told numerous times not to coach or talk to the children regarding
25 adult or court matters, he continues to do so. Weston is again, a child in conflict. The courts
26 had to order every possible order this past year just to hold Matthew to getting Weston to his
27 tournaments and clinics. Regardless, Jennifer has told the courts many times that she is still
28

1 having issues with Matthew's cooperation, and Matthew still complains about wrestling. How
2 is Weston supposed to enjoy a sport, any sport, if his father constantly complains about it.
3 The real issue of Matt's complaint is that the tournaments can be long days. They are not a 1
4 or 2 hour event. They start early in the morning with a "weigh in" to make sure the kids are
5 properly matched up by age and weight. Weigh In is generally from 6:00 a.m. to 7:30 a.m.
6 with matches starting at 9:00 a.m. If Weston continues to win then he advances. If he
7 advances to the final rounds then he might be at the gym until 3:00, 4:00 or 5:00 p.m.
8 Anyhow, because of all the issues that Matt has raised in the past, the courts ordered on
9 November 7, 2013 "If there are any scheduled wrestling tournaments for the children while
10 they are in father's custody, father is to make sure that they get there". On January 16, 2014
11 Jennifer notified the courts again of Matthew's failure to cooperate, and follow the orders, and
12 about the problems with Matthew still discussing court issues amongst other things, to the
13 children. Even though it has been ordered at almost every court hearing. Then, Weston
14 decided that he wanted to participate as one of the youth referees, something that can lead to
15 his future enjoyment and participation in the sport long past his ability to participate as a
16 wrestler, as referees are needed at all events and many of them well into their senior years.
17 But, because of the issue with the children's' pick up time of 6 pm on Fridays coinciding with
18 Weston's referee clinics at 6 pm on Fridays, the courts added another order, ordered and filed
19 February 11, 2014, " If the children have wrestling clinics on dad's time, dad shall pick up the
20 children after the clinics are done". The final discussion about wrestling took place at the
21 May 1, 2014 hearing. Jennifer again showed issues of Matthew's lack of cooperation and not
22 having Weston at his awards. Matthew claimed that he had shown Margaret Pickard text
23 messages regarding the issues and that Margaret had told him that only one tournament had to
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1 be scheduled during his time. The court suggested that " Defendant discuss the wrestling
2 tournaments with Margaret Pickard when she takes the UNLV Cooperative Parenting
3 Classes". Jennifer did... Margaret said that she was not ever shown any text messages then
4 she wrote a very detailed letter for the courts. She emailed it to Jennifer AND to Matthew,
5 and it was filed on June 27, 2014. Attached as **Exhibit 12** is the aforementioned email.
6

7 MOST IMPORTANTLY we discuss Chevy's medical history. Matthew has always
8 been given notice and communications regarding everything, yet he fails to communicate in
9 return. Matthew has brought up the issue of Chevy's brain surgery several times in court, but
10 the courts are well aware of the details surrounding his surgery. Matthew was allowed to
11 attend but was on strict rules to follow the therapist's instructions because Chevys surgery
12 occurred shortly after the reunification process started. Matthew never contacted Chevy's
13 neurosurgeon before or after the surgery, for any additional details, instead he just showed up
14 the day of the surgery and was caught telling the pre-op staff what Chevy's current medical
15 history is/was... It was quickly corrected and the staff was notified that Matthew had not had
16 any discussions with any of Chevy's doctors and truly did not know what he was talking
17 about. Matthew caused many issues during Chevy's stay at the hospital, resulting in him
18 being escorted out at 2 a.m. one morning. He used foul language and was irritable and defiant
19 in front of Jennifer and hospital personnel. It was a nightmare for Jennifer, and it all took
20 place in front of Chevy. He did not follow any of the rules the therapist had listed for him to
21 follow. It was a horrible situation for Chevy. Upon Chevy's return surgery on July 16, 2013
22 for a related MRSA infection in the wound, Matthew again threw tantrums when he was told
23 to put a gown on for Chevy's protection and isolation. He kept removing his mask and gloves
24 and touching Chevy. When he was asked to put them back on he yelled at Jennifer to "shut-
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1 up", threw his gown and everything on the floor , and stormed out. All in front of Chevy.
2 Chevy went through hell and has been on close observation since then, Matthew still refuses
3 to take any of this seriously. Chevy's full medical records were provided to opposing counsel
4 in open court on August 28, 2014. Attached as **Exhibit 13** is the letter from the neurosurgeon.
5

6 Matthew has failed to ever put the children first, but instead has worked out of anger
7 and spite towards Jennifer, for years and years. He continues to have problems because he
8 still does not take responsibility for his own actions. Jennifer did not force Matthew to take
9 drugs, Jennifer did not keep Matthew from reporting to his probation officer, and Jennifer did
10 not cause all of his employment problems. Attached as **Exhibit 14** is the email from the
11 Officer La Putt. Those things were the result of Matthew's own self destructive behavior, and
12 the poor choices he continues to make. Jennifer is only guilty of trying to provide and
13 maintain a healthy, stable environment for all the children in her household. She asks the
14 courts to please carefully review any and all history and all documentations with this case.
15 The wellbeing and growth of the children depend on it.
16

17
18 Also in regards to Matthew's recently filed Financial Disclosure Form, Matthew stated
19 that he pays \$100 per child each month in unreimbursed medical expenses. However, this is
20 false. Matthew has not ever paid a single dime for any of the children's medical expenses.
21

22 DATED this 12 day of September, 2014.

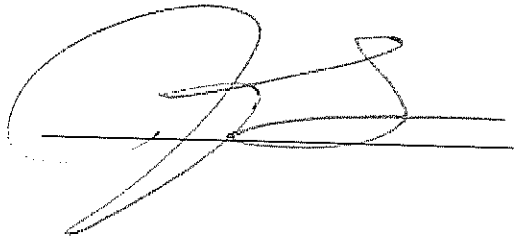
23
24 

25 JENNIFER GORDON
26 91 Autumn Day Street
27 Henderson, Nevada 89012
28 (702) 234-9673
Elise433@gmail.com
Defendant in Proper Person

1
2 **CERTIFICATE OF MAILING**
3

4 Pursuant to Nevada Rule of Civil Procedure 5(b), I certify service of Defendant's REPLY
5 was made this 12 day of September, 2014, by depositing a true copy, first class mail, in a sealed
6 envelope, postage prepaid at Henderson, Nevada, addressed as follows:

7 Peter J. Bellon, Esq.
8 732 South Sixth Street, #102
9 Las Vegas, Nevada 89101
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11
12
13
14
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A handwritten signature in dark ink, appearing to read 'PJ Bellon', is written over a horizontal line.

**PLEADING
CONTINUES
IN NEXT
VOLUME**