

# IN THE SUPREME COURT OF THE STATE OF NEVADA

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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 3

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**

<b><u>VOLUME:</u></b>	<b><u>PAGE NUMBER:</u></b>
1	1 - 230
2	231 - 460
3	461 - 690
4	691 - 812

**INDEX**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
3	12/11/2014	ABC'S OF PARENTING	605 - 606
3	01/14/2015	ABC'S OF PARENTING FOR JENNIFER AND BARON	607 - 608
3	01/14/2015	ABC'S OF PARENTING FOR JENNIFER AND BARON	609 - 610
2	06/27/2014	AFFIDAVIT OF MARGARET PICKARD	353 - 355
1	06/03/2010	AFFIDAVIT OF SERVICE	6 - 6
1	04/29/2013	AFFIDAVIT OF SERVICE	221 - 224
2	08/08/2014	AFFIDAVIT OF SERVICE	404 - 405
3	10/03/2014	AFFIDAVIT OF SERVICE	554 - 555
4	05/28/2015	AMENDED NOTICE OF WITHDRAWAL OF ATTORNEY	740 - 741
1	06/11/2010	ANSWER AND COUNTERCLAIM FOR DIVORCE	7 - 16
1	11/01/2010	BEHAVIOR ORDER	31 - 32
4	05/05/2015	CASE APPEAL STATEMENT	731 - 733
4	05/07/2015	CASE APPEAL STATEMENT	736 - 737
4	05/06/2015	CERTIFICATE OF E-SERVICE	735 - 735
1	06/11/2010	CERTIFICATE OF MAILING	20 - 20
1	06/28/2010	CERTIFICATE OF MAILING	23 - 24
1	01/19/2011	CERTIFICATE OF MAILING	50 - 51
1	05/07/2013	CERTIFICATE OF MAILING	225 - 225
1	05/14/2013	CERTIFICATE OF MAILING	226 - 226
2	06/18/2013	CERTIFICATE OF MAILING	246 - 246
2	08/14/2013	CERTIFICATE OF MAILING	260 - 260
2	08/15/2013	CERTIFICATE OF MAILING	263 - 263
2	10/10/2013	CERTIFICATE OF MAILING	276 - 276
2	11/13/2013	CERTIFICATE OF MAILING	323 - 324
2	01/13/2014	CERTIFICATE OF MAILING	328 - 328
2	03/28/2014	CERTIFICATE OF MAILING	333 - 333
2	06/26/2014	CERTIFICATE OF MAILING	347 - 347
2	08/04/2014	CERTIFICATE OF MAILING	356 - 356

**INDEX**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
3	02/24/2015	CERTIFICATE OF MAILING	627 - 628
3	03/13/2015	CERTIFICATE OF MAILING	648 - 648
3	03/20/2015	CERTIFICATE OF MAILING	669 - 669
4	05/04/2015	CERTIFICATE OF MAILING	721 - 721
4	05/05/2015	CERTIFICATE OF MAILING AND E-SERVICE	722 - 726
2	08/25/2014	CERTIFICATE OF SERVICE	441 - 441
4	09/16/2015	CERTIFICATION OF COPY AND TRANSMITTAL OF RECORD	
1	05/26/2010	COMPLAINT FOR DIVORCE	1 - 5
1	06/11/2010	DECLARATION UNDER UNIFORM CHILD CUSTODY JURISDICTION ENFORCEMENT ACT (NRS 125A.385)	17 - 19
1	09/27/2011	DECREE OF DIVORCE	132 - 143
1	05/23/2011	DEFENDANT'S FIRST AMENDED ANSWER TO COMPLAINT FOR DIVORCE AND COUNTERCLAIM FOR DIVORCE	106 - 112
1	04/19/2013	DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR AN EMERGENCY HEARING TO ENFORCE CHILD CUSTODY AND/OR VISITATION ORDER ON AN ORDER SHORTENING TIME AND DEFENDANT'S COUNTERMOTION FOR SUPERVISED VISITATION, FOR A MODIFICATION OF CHILD SUPPORT AND TO REDUCE TO JUDGEMENT PLAINTIFF'S CHILD SUPPORT ARREARS	162 - 213
3	09/18/2014	DEFENDANT'S PRE-TRIAL MEMORANDUM	546 - 551
1	05/23/2011	DEFENDANT'S PRE-TRIAL MEMORANDUM STATEMENT OF ESSENTIAL FACTS	93 - 105
3	09/18/2014	DEFENDANT'S WITNESS LIST AND PRODUCTION OF DOCUMENTS PURSUANT TO NRCP 16.2	542 - 545
4	09/16/2015	DISTRICT COURT MINUTES	748 - 812
2	08/04/2014	EX PARTE MOTION FOR AN ORDER SHORTENING TIME	401 - 402
4	05/06/2015	FAMILY COURT MOTION/OPPOSITION FEE INFORMATION SHEET (NRS 19.0312)	734 - 734
1	03/25/2011	FINANCIAL DISCLOSURE FORM (SEALED)	57 - 87

**INDEX**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
1	04/29/2013	FINANCIAL DISCLOSURE FORM (SEALED)	214 - 220
2	08/25/2014	GENERAL FINANCIAL DISCLOSURE FORM (SEALED)	431 - 440
1	08/27/2010	JOINT PRELIMINARY INJUNCTION	27 - 27
1	05/23/2011	LIST OF WITNESSES & EXHIBITS	113 - 115
2	09/16/2013	MINUTE ORDER	264 - 266
2	08/04/2014	MOTION AND NOTICE OF MOTION FOR ORDERS TO MODIFY CHILD CUSTODY, VISITATION, AND/OR CHILD SUPPORT	380 - 400
1	04/09/2013	MOTION FOR AN EMERGENCY HEARING TO ENFORCE CHILD CUSTODY AND/OR VISITATION ORDER ON AN ORDER SHORTENING TIME	149 - 161
2	11/12/2013	MOTION FOR AN ORDER TO SHOW CAUSE	281 - 300
2	11/12/2013	MOTION FOR AN ORDER TO SHOW CAUSE	303 - 322
2	08/04/2014	MOTION FOR AN ORDER TO SHOW CAUSE	357 - 377
4	05/05/2015	MOTION FOR APPLICATION AND AFFIDAVIT TO PROCEED ON APPEAL IN FORMA PAUPERIS (SEALED)	727 - 729
3	05/01/2015	MOTION TO CONFORM ORDER FROM OCTOBER 09, 2014 TO COURTS MINUTES AND JUDGE'S ORAL PRONOUNCEMENTS (CONTINUED)	686 - 690
4	05/01/2015	MOTION TO CONFORM ORDER FROM OCTOBER 09, 2014 TO COURTS MINUTES AND JUDGE'S ORAL PRONOUNCEMENTS (CONTINUATION)	691 - 720
2	08/08/2013	MOTION TO WITHDRAW AS PLAINTIOFF'S COUNSEL	251 - 257
3	10/03/2014	NOTICE OF "UNBUNDLED" APPEARANCE OF COUNSEL FOR DEFENDANT	602 - 603
1	07/15/2010	NOTICE OF 16.2 CASE MANAGEMENT CONFERENCE	25 - 25
4	05/05/2015	NOTICE OF APPEAL	730 - 730
1	04/12/2011	NOTICE OF APPEARANCE	88 - 89
1	05/25/2011	NOTICE OF APPEARANCE	116 - 117
2	08/21/2014	NOTICE OF APPEARANCE	406 - 407

**INDEX**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
1	01/20/2011	NOTICE OF CHANGE OF ADDRESS	52 - 52
1	04/04/2012	NOTICE OF CHANGE OF ADDRESS (SEALED)	148 - 148
1	10/06/2011	NOTICE OF ENTRY OF DECREE OF DIVORCE	144 - 145
2	09/19/2013	NOTICE OF ENTRY OF MINUTE ORDER	269 - 272
1	01/19/2011	NOTICE OF ENTRY OF ORDER	49 - 49
2	06/13/2013	NOTICE OF ENTRY OF ORDER	242 - 245
2	10/10/2013	NOTICE OF ENTRY OF ORDER	273 - 275
2	01/13/2014	NOTICE OF ENTRY OF ORDER	327 - 327
2	03/28/2014	NOTICE OF ENTRY OF ORDER	334 - 338
2	06/26/2014	NOTICE OF ENTRY OF ORDER	348 - 352
3	03/20/2015	NOTICE OF ENTRY OF ORDER	649 - 658
3	04/10/2015	NOTICE OF ENTRY OF ORDER	681 - 685
4	06/30/2015	NOTICE OF ENTRY OF ORDER	744 - 746
1	06/28/2011	NOTICE OF ENTRY OF ORDER FROM HEARING	125 - 129
1	03/21/2011	NOTICE OF HEARING	55 - 56
2	08/02/2013	NOTICE OF HEARING	247 - 250
2	08/14/2013	NOTICE OF HEARING	258 - 259
2	10/23/2013	NOTICE OF HEARING	279 - 280
3	02/23/2015	NOTICE OF MOTION	611 - 626
2	11/12/2013	NOTICE OF MOTION FOR AN ORDER TO SHOW CAUSE	301 - 302
2	08/04/2014	NOTICE OF MOTION FOR AN ORDER TO SHOW CAUSE	378 - 379
1	01/03/2011	NOTICE OF RESCHEDULING OF HEARING	47 - 48
3	09/25/2014	NOTICE OF RESCHEDULING OF HEARING	552 - 553
1	08/30/2010	NOTICE OF SEMINAR COMPLETION - EDCR 5.07	28 - 28
1	08/30/2010	NOTICE OF SEMINAR COMPLETION - EDCR 5.07	29 - 29
1	06/17/2011	NOTICE OF SEMINAR COMPLETION EDCR 5.07-FAMILY	119 - 120
2	04/30/2014	NOTICE OF SEMINAR COMPLETION EDCR 5.07-FAMILY	339 - 340
2	06/25/2014	NOTICE OF SEMINAR COMPLETION EDCR 5.07-FAMILY	345 - 346

**INDEX**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
2	10/10/2013	NOTICE OF WITHDRAWAL	277 - 278
1	05/14/2013	NOTICE OF WITHDRAWAL (CONTINUED)	227 - 230
2	05/14/2013	NOTICE OF WITHDRAWAL (CONTINUATION)	231 - 232
1	10/06/2011	NOTICE OF WITHDRAWAL OF ATTORNEY	146 - 147
2	05/29/2013	NOTICE OF WITHDRAWAL OF ATTORNEY	233 - 235
2	06/06/2013	NOTICE OF WITHDRAWAL OF ATTORNEY	239 - 241
4	05/26/2015	NOTICE OF WITHDRAWAL OF ATTORNEY	738 - 739
4	06/17/2015	NOTICE OF WITHDRAWAL OF COUNSEL FOR DEFENDANT	742 - 743
2	08/25/2014	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	408 - 430
3	03/13/2015	OPPOSITION TO DEFENDANT'S MOTION FOR RECONSIDERATION, NEW TRIAL AND AMENDMENT OF JUDGMENT PURSUANT TO RULE 59; AND RELIEF FROM JUDGMENTS PURSUANT TO RULE 60B(1) AND COUNTERMOTION TO ENFORCE THE TERMS OF THE OCTOBER 9, 2014 ORDER, FOR ANOTHER CHILD INTERVIEW OR EVALUATION AND FOR ATTORNEY'S FEES AND RELATED RELIEF	629 - 647
1	12/29/2010	ORDER	41 - 46
2	05/29/2013	ORDER	236 - 238
2	02/11/2014	ORDER	329 - 332
2	06/04/2014	ORDER	341 - 344
3	03/20/2015	ORDER	670 - 677
3	04/09/2015	ORDER	678 - 680
4	06/30/2015	ORDER	747 - 747
1	08/30/2010	ORDER FOR FAMILY MEDIATION CENTER SERVICES	30 - 30
1	05/27/2011	ORDER FOR SUPERVISED VISITATION	118 - 118

**INDEX**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
1	06/27/2011	ORDER FROM HEARING	121 - 124
1	03/15/2011	ORDER SETTING EVIDENTIARY HEARING	53 - 54
2	09/05/2014	ORDER SETTING EVIDENTIARY HEARING	442 - 443
2	08/06/2014	ORDER SHORTENING TIME	403 - 403
2	01/13/2014	ORDER TO SHOW CAUSE	325 - 326
2	09/17/2013	ORDER TO VACATE HEARING	267 - 268
1	11/01/2010	PARTIAL PARENTING AGREEMENT	33 - 38
3	10/03/2014	PLAINTIFF'S PRETRIAL MEMORANDUM	556 - 601
3	09/12/2014	RECEIPT OF COPY	540 - 540
3	09/18/2014	RECEIPT OF COPY	541 - 541
3	10/06/2014	RECEIPT OF COPY	604 - 604
1	12/14/2010	REFERRAL ORDER FOR OUTSOURCED EVALUATION SERVICES	39 - 39
1	12/14/2010	REFERRAL ORDER FOR OUTSOURCED EVALUATION SERVICES	40 - 40
1	06/28/2010	REPLY TO COUNTERCLAIM	21 - 22
3	03/20/2015	REPLY TO OPPOSITION AND COUNTERMOTION	659 - 668
2	09/12/2014	REPLY TO OPPOSITION AND OPPOSITION TO COUNTERMOTION (CONTINUED)	444 - 460
3	09/12/2014	REPLY TO OPPOSITION AND OPPOSITION TO COUNTERMOTION (CONTINUATION)	461 - 539
1	05/17/2011	SCHEDULE OF ARREARAGES	90 - 92
1	08/27/2010	SUMMONS	26 - 26
2	08/15/2013	SUPPLEMENT TO PLAINTIFF'S PLEADINGS	261 - 262
1	08/19/2011	WITHDRAWAL OF ATTORNEY	130 - 131



## EXHIBIT 1

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint****COURT MINUTES**

May 27, 2011

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

May 27, 2011      9:30 AM      Evidentiary Hearing

HEARD BY: Nathan, Gayle

COURTROOM: RJC Courtroom 10B

COURT CLERK: Lucinda Tait

**PARTIES:**

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

<b>JOURNAL ENTRIES</b>
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**- EVIDENTIARY HEARING**

Plaintiff/father present with Attorney Chris Aaron. Defendant/mother present with Attorney Soraya M. Veiga.

Attorney Aaron requested a CONTINUANCE for today's hearing, COURT DENIED his request and reviewed the history of the case.

Attorney Aaron then requested a SIDEBAR with Counsel and Judge Nathan, to which Judge agreed to.

Judge Nathan re-entered the courtroom and advised she would take a RECESS in order for the Attorney's to speak to the parties about possible negotiations.

Matter RECALLED.

PRINT DATE:	08/04/2014	Page 7 of 15	Minutes Date:	March 29, 2011
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Attorney Aaron advised the parties have reached a settlement, as follows:

Each party shall keep their own vehicle as their sole and separate property.

Plaintiff shall keep his 1989 Blazer which is paid for and the 2005 Yamaha R1 which is paid for and the 1989 Jimmy which is also paid for.

Plaintiff shall keep 100% of his Pension, furniture in his possession, his clothes, jewelry and personal effects and any bank account under his name.

Defendant shall keep the 1989 Grand Marquis which is paid for and the 1990 Cadillac Seville which is paid for.

Defendant shall keep 100% of her Pension, furniture in her possession, her clothes, jewelry and personal effects and any the Bank of America checking account under her name.

Each party shall be 50% responsible for any deficiency from the marital residence that was foreclosed on 12/25/10.

Plaintiff shall be 100% responsible for any and all medical debt he accrued under his name.

Plaintiff shall REIMBURSE the Defendant \$499.89 for the debt of Monitronics Alarm system, which is currently being deducted from the Defendant's current bank account.

Plaintiff shall be RESPONSIBLE for 50% of Mountain View Christian School debt in the amount of \$3,207.32.

Plaintiff agrees to pay the Defendant \$1200.00 in thirty days which will cover ANY and ALL medical arrears and child support arrears which were covered in the schedule of arrears, through 5/15/11. This \$1200.00 will also include a debt the Plaintiff had to the Defendant as she was paying his car insurance through her bank account and those payments were automatically deducted from her account, from 1/11 - 7/11.

Attorney Aaron reported Plaintiff will undergo a psychological evaluation and would like a list from the Court as to the providers covered under his insurance. Until such time as that evaluation is completed, the parties have agreed to:

ONE weekend a month SUPERVISED VISITATION at OPEN ARMS for two (2) hours on Saturday and two (2) hours on Sunday, preferably the 2nd weekend of every month. If father's evaluation is successful, the parties agree the father shall have two (2) weekends a month, those being the 2nd and 4th weekends, UNSUPERVISED VISITATION and the parties will meet in Barstow, California for the child exchange. Children exchange shall be at approximately 7:00 pm on Friday's, with a half hour

PRINT DATE:	08/04/2014	Page 8 of 15	Minutes Date:	March 29, 2011
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window, unless the parties can mutually agree on another time by text message. Return time shall be 5:00 pm on Sunday.

Parties are STIPULATING to JOINT LEGAL CUSTODY of the children, with mother having PRIMARY CUSTODY. Parties further STIPULATE that mother may relocate to the State of California.

COURT ORDERED, upon completion of the psychological evaluation by father, this matter shall be RENOTICED for a hearing so that the Court may review it and father may make an application to have more time with the children, that being UNSUPERVISED. There is to be NO UNSUPERVISED VISITATION without the Court reviewing father's psychological evaluation first.

COURT FURTHER ORDERED, father is NOW under an ORDER TO SHOW CAUSE as to the psychological evaluation, which was ordered back on 12/14/10. COURT FINDS, plaintiff in CONTEMPT for not complying with this Order after being before the Court numerous times since the evaluation was Ordered.

COURT ORDERED, if this matter comes before the Court for any reason and the psychological evaluation has NOT been completed the Court will IMPOSE SANCTIONS on the CONTEMPT issued today.

Court advised Attorney Aaron that Dr. Mark Chambers does a good job on psychological evaluations and his address is: 8275 S. Eastern Avenue, Suite 200, Las Vegas, NV 89123, phone number 702-614-4450.

Discussion as to father's current income as he is receiving unemployment. Following statements, COURT ORDERED, as father's Gross income at this time is \$1,600.00 per month, his OBLIGATION for CHILD SUPPORT shall be \$400.00 per month, effective June, 2011. As soon as father is working, he is to forward a copy of his paycheck to Attorney Aaron, who will forward to Attorney Veiga and the parties shall then STIPULATE to CHILD SUPPORT in the amount of 25% of his current income.

COURT is giving father an OFFSET for gas costs when parties start to meet in Barstow, California. Counsel shall do the calculation as to that amount and is to figure it into the Decree.

COURT imposes SUPERVISED VISITATION immediately at OPEN ARMS on Saturday from 1:00 pm - 5:00 pm and on Sunday from 12:30 - 4:30 pm. Parties shall split the COSTS of OPEN ARMS fee.

Both parties STIPULATE to WAIVE SPOUSAL SUPPORT.

Parties shall pay their own Attorney Fees.

Parties SWORN and TESTIFIED.

PRINT DATE:	08/04/2014	Page 9 of 15	Minutes Date:	March 29, 2011
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Mother shall have the obligation of having the children covered on her medical insurance.

Any unreimbursed medical expenses shall be borne equally (50/50) between the parties subject to the 30/30 rule whereby the party incurring the expense shall have 30 days to submit the bill to the other party and that party will have 30 days to reimburse the party incurring the expense for one-half the bill.

COURT FINDS, it has personal and subject matter JURISDICTION and JURISDICTION over the minor children.

COURT ORDERED, absolute DECREE OF DIVORCE is GRANTED pursuant to the terms and conditions as outlined in the parties STIPULATED agreement.

Court advised once the psychological evaluation has been received it will be duly noticed, Counsel may deliver the evaluation to Judge Nathan's chambers with a letter to be LODGED not FILED and then there will be a hearing on the evaluation.

Attorney Veiga to PREPARE and SUBMIT Decree from today's hearing and have Attorney Aaron REVIEW and COUNTERSIGN by 6/17/11.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

*Canceled: August 20, 2013 10:00 AM Order to Show Cause*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot*

*Nathan, Gayle*

*Courtroom 14*

*Tait, Lucinda*

*Canceled: September 17, 2013 10:00 AM Motion*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated*

*Nathan, Gayle*

*Courtroom 14*

*Tait, Lucinda*

*Canceled: December 31, 2013 9:30 AM Motion for Order to Show Cause*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - per Law Clerk*

*Nathan, Gayle*

*Courtroom 05*

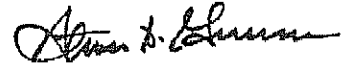
*Canceled: January 16, 2014 9:30 AM Status Check*

*September 23, 2014 10:00 AM Motion for Order to Show Cause*

*Nathan, Gayle*

PRINT DATE:	08/04/2014	Page 10 of 15	Minutes Date:	March 29, 2011
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## EXHIBIT 2



CLERK OF THE COURT

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

5  
6 DISTRICT COURT  
7 FAMILY DIVISION  
8 CLARK COUNTY, NEVADA

9 MATTHEW ROBERT GEIGER

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

10 Plaintiff,

11 vs.

12 JENNIFER ELISE GORDON,

Defendant,

13 DECREE OF DIVORCE

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

19 DISPOSITIONS

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

25 Guardianship

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

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

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

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

28 RECEIVED

AUG 31 2011

FAMILY COURT  
DEPARTMENT

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

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

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

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

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

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

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

19 Good cause appearing, therefor:

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

15 **CHILD SUPPORT**

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

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

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

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

4                               **HEALTH CARE**

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

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

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

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

5 **ALIMONY**

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

9 **DISTRIBUTION OF COMMUNITY ASSETS AND DEBTS**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1                                   **ADDITIONAL TERMS AND CONDITIONS**

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

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

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

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

13                                   **SEPARATE AGREEMENTS**

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

17                                   **INDEMNIFICATION**

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

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



1                                   **ENFORCEMENT OF THIS DECREE OF DIVORCE**

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

8                                   **CONTEMPT OF COURT**

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

14                                  **EXECUTION OF DOCUMENTS**

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

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

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

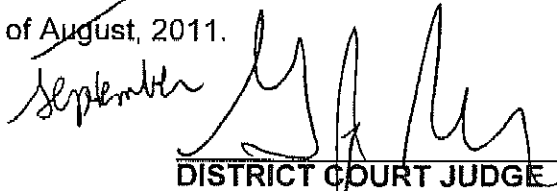
3 **DEFENDANT'S NAME**

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

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

12 DATED this 27 day of August, 2011.


13 IT IS SO ORDERED

14   
15 **DISTRICT COURT JUDGE**

16 **GAYLE NATHAN** *ct*

17 Respectfully submitted by:

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

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

## EXHIBIT 3

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint**

**COURT MINUTES**

**November 01, 2010**

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

**November 01, 2010      11:00 AM      Return Hearing**

**HEARD BY:** Giuliani, Cynthia N.

**COURTROOM:** Courtroom 06

**COURT CLERK:** Victoria Pott

**PARTIES:**

Chevy Geiger, Subject Minor, not present  
Jennifer Gordon, Defendant, Counter      Pro Se  
Claimant, 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**

- Court reviewed the partial parenting agreement.

PARTIAL PARENTING AGREEMENT EXECUTED and FILED IN OPEN COURT. COURT ORDERED, PARTIAL PARENTING AGREEMENT AFFIRMED and ADOPTED.

Defendant stated Plaintiff is currently incarcerated for possession of a controlled substance and will likely remain in jail for a period of time. Defendant stated she will be flying some witnesses in for the Evidentiary Hearing on December 14th, and would like some direction from the Court as Plaintiff will likely not be in attendance.

Defendant stated the current visitation is not working out and Plaintiff has not been paying child support.

Based on the testimony of the Defendant, COURT FURTHER ORDERED as follows:

PRINT DATE:	08/04/2014	Page 4 of 16	Minutes Date:	August 30, 2010
-------------	------------	--------------	---------------	-----------------

- 1) Plaintiff shall file an updated FINANCIAL DISCLOSURE FORM (FDF).
- 2) Neither party shall speak to the children regarding the litigation or make disparaging remarks about the other party in the presence of the children. MUTUAL BEHAVIOR ORDER ISSUED and FILED IN OPEN COURT.
- 3) The Evidentiary Hearing scheduled for 12/14/10 STANDS. Pending the Evidentiary Hearing, Plaintiff shall have TEMPORARY SUPERVISED VISITATION with the minor children. Supervision shall be done by a third party at the discretion of the Defendant.

Defendant shall prepare the Order from today's hearing.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

*Canceled: March 09, 2011 11:00 AM Return Hearing*

*Canceled: August 20, 2013 10:00 AM Order to Show Cause*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot*

*Nathan, Gayle*

*Courtroom 14*

*Tait, Lucinda*

*Canceled: September 17, 2013 10:00 AM Motion*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated*

*Nathan, Gayle*

*Courtroom 14*

*Tait, Lucinda*

*Canceled: December 31, 2013 9:30 AM Motion for Order to Show Cause*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - per Law Clerk*

*Nathan, Gayle*

*Courtroom 05*

*Canceled: January 16, 2014 9:30 AM Status Check*

*September 23, 2014 10:00 AM Motion for Order to Show Cause*

*Nathan, Gayle*

*Courtroom 05*

*Boyle, Kathleen*

*September 23, 2014 10:00 AM Motion*

*Nathan, Gayle*

*Courtroom 05*

*Boyle, Kathleen*

PRINT DATE:	08/04/2014	Page 5 of 16	Minutes Date:	August 30, 2010
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ORIGINAL

FILED

DEC 29 8 20 AM '10

*Ann L. Johnson*  
CLERK OF THE COURT

1 ORDER

2 (Your name) Matthew R. Geiger  
3 (Address) 866A Horizon wind ave #103  
4 Las Vegas, N.V. 89178  
5 (Telephone) (702) 443-0101  
6 In Proper Person

7 DISTRICT COURT  
8 CLARK COUNTY, NEVADA

9 Matthew R. Geiger )  
10 Plaintiff, )

CASE NO.: D-10-430639-D

11 vs )

DEPT. NO.: K

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

DATE OF HEARING 12-14-2010

TIME OF HEARING 1:30 pm

16  
17 ORDER

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

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

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

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

DEC 17 2010

DISTRICT COURT  
DEPT K

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

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

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

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

26 Parties are ~~not~~ referred for a CHILD INTERVIEW for both children.  
27  
28

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

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

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

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

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

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

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

2 a



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

2  
3 DEFENDANT shall receive the SECOND WEEK of the 2010 CHRISTMAS HOLIDAY  
4 from SUNDAY DEC. 26, 2010 until SUNDAY, JANUARY 01, 2011.  
5  
6

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

8 PLAINTIFF shall SERVE a COPY to DEFENDANT.  
9  
10


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

14 PLAINTIFF shall PROVIDE PROOF of the CHILD SUPPORT PAYMENTS to DEFENDANT  
15 via MAILING, and also to the COURT by way of COURTESY COPY of the Document  
16 or DOCUMENTS sent to DEFENDANT.  
17  
18

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

25 PLAINTIFF shall PREPARE the ORDER.  
26  
27

Respectfully submitted,

  
Matthew Geiger

26

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

7  
8       **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125.510(6):

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

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

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

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

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

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

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

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


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

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

16 DATED this 28<sup>th</sup> day of December, 2010.

17   
18 DISTRICT COURT JUDGE cc

19 Respectfully submitted:

20  
21 (Your signature) 

22 (Your name) Matthew R. Geiger  
23 Plaintiff In Proper Person

24  
25 (Your signature) \_\_\_\_\_

26 (Your name) \_\_\_\_\_  
27 Defendant In Proper Person  
28

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint****COURT MINUTES****March 08, 2011**

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

**March 08, 2011      2:00 PM      Return Hearing**

**HEARD BY:** Nathan, Gayle**COURTROOM:** RJC Courtroom 10A**COURT CLERK:** Lucinda Tait**PARTIES:**

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

<b>JOURNAL ENTRIES</b>
------------------------

- RETURN HEARING RE: PSYCHOLOGICAL EVALUATION, COUNSELING, CHILD INTERVIEW REPORT, PARENTING CLASSES

This matter heard simultancously with T-10-125476-T, which expires on 5/26/11.

Court noted this matter was on calendar at 2:00 pm, matter called at 2:40 pm and Plaintiff (father) appeared at 2:50 pm. Defendant (mother) present for hearing without counsel as well.

Court advised parties she has reviewed entire file and all papers and pleadings therein and knows the history of this matter. Court noted, a Judgment of Conviction was filed on father and he is now on probation.

Court reviewed the last order with parents to see what they have complied with. Father reported he had a psychological exam at Comprehensive Therapy Services, however, he saw the same Doctor he always sees, Dr. Clariana Petrie. Dr. Petrie referred father to a Psychologist, but he didn't follow up.

<b>PRINT DATE:</b> 08/04/2014	Page 11 of 16	Minutes Date:	August 30, 2010
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Mother advised she has complied with placing father's contact information on the children's school records and doctor records. Parents are communicating by electronic mail.

Children are still not enrolled in counseling as Ordered previously. Mother reported father never provided her with the names of the Counselor of his choice, so she was unable to enroll the children.

COURT ORDERED, mother has AUTHORITY to choose Counselor for children as previously Ordered. Children are to be ENROLLED within 30 days.

Mother advised she could NOT afford the Ordered parenting classes previously because they did not offer a payment plan. Mother feels she can afford to pay for the classes now.

COURT FINDS, no SCHEDULE of ARREARS filed in this matter, therefore, COURT ORDERED, SCHEDULE of ARREARS must be FILED within 30 days. Mother reported she received \$220.00 child support on February 1, 2011.

Father addressed court and advised he is currently attending Cooperative Parenting classes. He also brought March's child support payment and other unpaid support for a total of \$660.00 paid to mother in OPEN COURT, which was confirmed by mother.

Discussion regarding father's unemployment income. Father reported he makes \$400.00 per week, COURT ORDERED, beginning April, 2011, child support to be \$433.00 per month. Once father is employed he is to notify mother and his child support will become 25% of his gross monthly income, effective the same month he begins employment. It is clear to the Court that mother has PRIMARY CUSTODY of children.

Following discussion, COURT ORDERED the following:

- 1) Judge Nathan will INTERVIEW the two children herself;
- 2) Parties STIPULATE there will be a TEMPORARY change in parenting order as to EXCHANGE of children on Friday's, from this date forward mother will bring the children to father's residence between 5:30 and 6:00 pm, father will arrange to have the children returned to mother by 7:00 pm on Sunday, and this EXCHANGE order to remain in effect until the next hearing;
- 3) Mother is RELIEVED of any two week notice, if mother or father want to take children for a special event, court will allow negotiations, however, if the parties don't agree, it's not going to happen;
- 4) Neither parent may take children out of State until further Order of this court;
- 5) Court Appointed Attorney Lynn Conant as Children's Guardian Ad Litem, parents are to pay 1/2 of Ms. Conant's bill.

PRINT DATE:	08/04/2014	Page 12 of 16	Minutes Date:	August 30, 2010
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COURT set matter for EVIDENTIARY HEARING 5/27/11 at 9:30 am. Both parties shall file, submit to chambers and exchange their Pre Trial Memorandums and Tabbed Exhibits no later than the close of business, 5/17/11. Failure to disclose any witnesses and/or provide the Court with tabbed exhibits will result in them not being permitted at the time of Evidentiary Hearing.

Court requested parties speak to Counsel, minutes from today's hearing SUFFICE as Order.

3/18/11 at 4:00 pm Child Interview w/Judge Nathan in Courtroom 10B, Attorney Lynn Conant to be present as Appointed Guardian Ad Litem for children.

5/17/11 at 3:00 pm Status Check Re: Have previous orders have been complied with.

5/27/11 at 9:30 am EVIDENTIARY HEARING.

#### INTERIM CONDITIONS:

#### FUTURE HEARINGS:

*Canceled: March 09, 2011 11:00 AM Return Hearing*

*Canceled: August 20, 2013 10:00 AM Order to Show Cause*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot  
Nathan, Gayle  
Courtroom 14  
Tait, Lucinda*

*Canceled: September 17, 2013 10:00 AM Motion*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated  
Nathan, Gayle  
Courtroom 14  
Tait, Lucinda*

*Canceled: December 31, 2013 9:30 AM Motion for Order to Show Cause*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - per Law Clerk  
Nathan, Gayle  
Courtroom 05*

*Canceled: January 16, 2014 9:30 AM Status Check*

*September 23, 2014 10:00 AM Motion for Order to Show Cause*

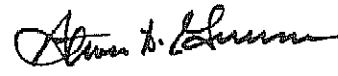
*Nathan, Gayle  
Courtroom 05  
Boyle, Kathleen*

*September 23, 2014 10:00 AM Motion*

*Nathan, Gayle  
Courtroom 05*

PRINT DATE:	08/04/2014	Page 13 of 16	Minutes Date:	August 30, 2010
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## EXHIBIT 4



CLERK OF THE COURT

1 **ORDR**  
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  
5 (702) 400-0000  
Email: [family@halfpricelawyers.com](mailto:family@halfpricelawyers.com)  
6 Attorney for Plaintiff  
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 **ORDER**

15  
16 This matter having come before the Court on the 7<sup>th</sup> day of May 2013 for Plaintiff's  
17 Motion for an emergency hearing, and related relief, and Defendant's Opposition and  
18 Countermotion, and Plaintiff MATTHEW ROBERT GEIGER, appearing with his counsel,  
19 CORINNE WURM, ESQ., *in an unbundled capacity*, and defendant JENNIFER ELISE  
20 GORDON, appearing with her counsel SORAYA VEIGA, ESQ., *in an unbundled capacity*,  
21 and the parties stipulated that father shall submit to drug testing (hair and urine) and mother  
22 will pay for said test. Counsel both agree that things need to be done in "baby steps". The  
23 Court noted that both parties attended and completed the UNLV Parenting program. The  
24 Court reported she read the psychological exam on father conducted by Dr. Harter. The Court  
25 advised that she thinks it is appropriate to start with therapeutic reunification for father with a  
26 mental health provider. The Court advised she is aware of the history of this case. The Court  
27

28 **RECEIVED**

✓ **MAY 20 2013**

**FAMILY COURT  
DEPARTMENT**

1  
s:\family client files and forms\rosenblum law offices\clients\geiger, matthew (-16479)\divorce\pleadings\order.docx



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

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

10 IT IS FURTHER ORDERED that father shall provide a calculation of child support,  
11 as he had an affirmative duty to advise mother of his employment.  
12

13 IT IS FURTHER ORDERED that Mother shall choose two (2) Mental Health  
14 Providers off of the list provided to counsel and father is to choose one (1) of the two to use  
15 by Friday 5/10/13 close of business. The therapist shall submit a letter to Chambers and  
16 Counsel once they feel father is ready for unsupervised visitation and the Court will place  
17 matter on calendar.  
18


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


21 IT IS HEREBY STIPULATED AND AGREED, AND THEREFORE, IT IS  
22 FURTEHR ORDERED that father can purchase the boys their own phones.  
23


24 IT IS FURTHER ORDERED that Mother may continue to monitor the phone calls  
25 with father until the reunification starts.  
26  
27  
28

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

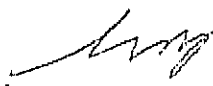
7 GAYLE NATHAN 

8 Submitted by:  
9   
10 ROSENBLUM LAW OFFICES

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@halfpricelawvers.com](mailto:family@halfpricelawvers.com)  
17 Attorney for Plaintiff  
18 in an Unbundled Capacity

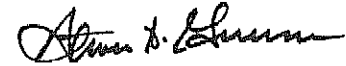
19 Approved as to form and content:

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

## EXHIBIT 5



CLERK OF THE COURT

1 ORDR  
2  
3  
4

5 DISTRICT COURT  
6 CLARK COUNTY, NEVADA

7 \*\*\*

8 Matthew Robert Geiger, Plaintiff.

CASE NO.: D-10-430637-D

DEPT NO.: T

9 vs.

10 Jennifer Elise Gordon, Defendant.

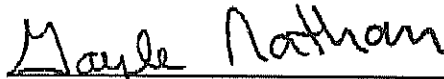
11 MINUTE ORDER  
12

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 10<sup>th</sup> day of September, 2013.  
22



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 6

Report Date: 08/26/2014

**Account Balance Summary Report  
for Matthew Geiger, Non Custodial Parent**

	Case Total	Docket Total	Arrears	Credit Balance	Interest	Penalty
<b>Grand Total For NCP</b>	<b>28879.69</b>	<b>28879.69</b>	<b>24530.98</b>	<b>0.00</b>	<b>2022.50</b>	<b>2326.21</b>
<b>905053200A: Gordon, Jennifer</b>	<b>28879.69</b>		24530.98	0.00	2022.50	2326.21
R-13-176576-R / 02		<b>28879.69</b>	24530.98	0.00	2022.50	2326.21
<b>Grand Total For NCP</b>	<b>28879.69</b>	<b>28879.69</b>	<b>24530.98</b>	<b>0.00</b>	<b>2022.50</b>	<b>2326.21</b>

These figures have been calculated using information in the possession of the District Attorney's Office

**Contact Person:**

R Dumas

DISTRICT ATTORNEY  
FAMILY SUPPORT DIVISION  
1900 E. FLAMINGO RD SUITE 100  
LAS VEGAS NV 89119



### NCP Financial Transaction History

Date: 08/26/2014

**NCP:** Matthew Geiger  
**CST:** Jennifer Gordon

Case ID: 905053200A

**Obligation: Child Support**

Transaction Date From: 10/20/2011

**Office: Clark Co District Attorney**

Docket#: R-13-176576-R

Transaction Date To: 08/26/2014

Record Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Future Payment Collected	Future Payment Distributed	Arrears Distributed	Interest Distributed	Interest Charged	Payment Distributed
Totals											
7/31/2014	07/31/2014	Month end accrual of Interest/Penalty								88.08	
7/31/2014	07/31/2014	NCP Payment		1246.00				54.00			
7/01/2014	07/01/2014	Monthly Obligation	1246.00								
6/30/2014	06/30/2014	Month end accrual of Interest/Penalty								88.32	
6/30/2014	06/30/2014	Month end accrual of Unpaid Support			1246.00						
6/01/2014	06/01/2014	Monthly Obligation	1246.00								
5/31/2014	05/31/2014	Month end accrual of Interest/Penalty								88.32	
5/31/2014	05/31/2014	Month end accrual of Unpaid Support			1246.00						
5/01/2014	05/01/2014	Month end accrual of Interest/Penalty								-0.13	
4/28/2014	05/01/2014	Worker's Compensation Payment						29.45			
5/01/2014	05/01/2014	Month end accrual of Interest/Penalty								-0.43	
4/28/2014	05/01/2014	Worker's Compensation Payment						100.00			
5/01/2014	05/01/2014	Month end accrual of Interest/Penalty									
4/28/2014	05/01/2014	Worker's Compensation Payment		3.66							
5/01/2014	05/01/2014	Monthly Obligation	1246.00								
4/30/2014	04/30/2014	Month end accrual of Interest/Penalty								88.88	
4/30/2014	04/30/2014	Month end accrual of Unpaid Support			3.66						
4/21/2014	04/23/2014	Worker's Compensation Payment		621.17							
4/07/2014	04/09/2014	Worker's Compensation Payment		621.17							
4/01/2014	04/01/2014	Monthly Obligation	1246.00								
3/31/2014	03/31/2014	Month end accrual of Interest/Penalty								88.88	
3/24/2014	03/25/2014	Unemployment Insurance Benefit Payment						178.00			
3/21/2014	03/21/2014	Worker's Compensation Payment		90.83				530.34			
3/17/2014	03/18/2014	Unemployment Insurance Benefit Payment		178.00							
3/30/2014	03/12/2014	Worker's Compensation Payment		621.17							

Received Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Future Payment Collected	Future Payment Distributed	Arrears Distributed	Interest Distributed	Interest Charged	Pe
3/10/2014	03/11/2014	Unemployment Insurance Benefit Payment		178.00							
3/03/2014	03/04/2014	Unemployment Insurance Benefit Payment		178.00							
3/01/2014	03/01/2014	Monthly Obligation	1246.00								
2/28/2014	02/28/2014	Month end accrual of Interest/Penalty									
2/21/2014	02/25/2014	Worker's Compensation Payment		534.00							91.98
2/24/2014	02/25/2014	Unemployment Insurance Benefit Payment		178.00				87.17			
2/18/2014	02/19/2014	Unemployment Insurance Benefit Payment		178.00							
2/20/2014	02/12/2014	Unemployment Insurance Benefit Payment		356.00							
2/01/2014	02/01/2014	Monthly Obligation	1246.00								
1/31/2014	01/31/2014	Month end accrual of Interest/Penalty									92.36
1/27/2014	01/29/2014	Income Withholding		236.50				100.00			
1/21/2014	01/22/2014	Income Withholding		336.50							
1/13/2014	01/14/2014	Income Withholding		336.50							
1/06/2014	01/08/2014	Income Withholding		336.50							
1/01/2014	01/01/2014	Monthly Obligation	1246.00								
2/31/2013	12/31/2013	Month end accrual of Interest/Penalty									92.80
2/09/2013	12/31/2013	Month end accrual of Unpaid Support			314.17						
2/09/2013	12/11/2013	Income Withholding		310.61							
2/02/2013	12/11/2013	Income Withholding		310.61							
2/01/2013	12/01/2013	Monthly Obligation	1246.00								
1/30/2013	11/30/2013	Month end accrual of Interest/Penalty									92.80
1/30/2013	11/30/2013	Month end accrual of Unpaid Support			314.16						
1/20/2013	11/19/2013	Income Withholding		310.61							
1/18/2013	11/19/2013	Income Withholding		310.62							
1/01/2013	11/19/2013	Income Withholding		310.61							
1/01/2013	11/01/2013	Monthly Obligation	1246.00								
0/31/2013	10/31/2013	Month end accrual of Interest/Penalty									92.80
0/31/2013	10/31/2013	Month end accrual of Unpaid Support			529.22						
0/28/2013	10/30/2013	Income Withholding		310.62							
0/21/2013	10/22/2013	Income Withholding		101.54							
0/15/2013	10/15/2013	Income Withholding		101.54							
0/07/2013	10/09/2013	Income Withholding		101.54							
0/07/2013	10/09/2013	Income Withholding		101.54							

Received Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Future Payment Collected	Future Payment Distributed	Arrears Distributed	Interest Distributed	Interest Charged	Pen Distri
0/01/2013	10/01/2013	Order Entry									
0/01/2013	10/01/2013	Monthly Obligation	1246.00								
9/23/2013	09/24/2013	Income Withholding		3.03							
9/16/2013	09/17/2013	Income Withholding		101.54				98.46			
9/16/2013	09/17/2013	Income Withholding		101.54							
9/03/2013	09/04/2013	Income Withholding		101.54							
9/04/2013	09/04/2013	Unemployment Insurance Benefit Payment		92.30							
9, 2013	09/01/2013	Monthly Obligation	400.00								
8/31/2013	08/31/2013	Month end accrual of Interest/Penalty									
8/31/2013	08/31/2013	Month end accrual of Unpaid Support			21.57						
8/26/2013	08/27/2013	Unemployment Insurance Benefit Payment		92.30							
8/19/2013	08/20/2013	Unemployment Insurance Benefit Payment		92.30							
8/12/2013	08/13/2013	Unemployment Insurance Benefit Payment		92.30							
8/02/2013	08/05/2013	Unemployment Insurance Benefit Payment		101.53							
8/01/2013	08/01/2013	Monthly Obligation	400.00								
7/29/2013	07/30/2013	Unemployment Insurance Benefit Payment						101.53			
7/29/2013	07/29/2013	Manual Arrears Adjustment									
7/22/2013	07/23/2013	Unemployment Insurance Benefit Payment		95.41				6.12			
7/15/2013	07/16/2013	Unemployment Insurance Benefit Payment		101.53							
7/08/2013	07/09/2013	Unemployment Insurance Benefit Payment		101.53							
7/01/2013	07/02/2013	Unemployment Insurance Benefit Payment		101.53							
7/01/2013	07/01/2013	Monthly Obligation	400.00								
6/24/2013	06/25/2013	Unemployment Insurance Benefit Payment		95.41				6.12			
6/ 2013	06/18/2013	Unemployment Insurance Benefit Payment		101.53							
6/2w/2013	06/11/2013	Unemployment Insurance Benefit Payment		101.53							
6/03/2013	06/04/2013	Unemployment Insurance Benefit Payment		101.53							
6/01/2013	06/01/2013	Monthly Obligation	400.00								
5/31/2013	05/31/2013	Month end accrual of Interest/Penalty									
5/31/2013	05/31/2013	Month end accrual of Unpaid Support			298.47						
5/28/2013	05/29/2013	Unemployment Insurance Benefit Payment		101.53							
5/01/2013	05/01/2013	Monthly Obligation	400.00								
4/15/2013	04/16/2013	Income Withholding		196.92				6.16			
4/08/2013	04/09/2013	Income Withholding		101.54							
4/01/2013	04/02/2013	Income Withholding		101.54							

Received Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Future Payment Collected	Future Payment Distributed	Arrears Distributed	Interest Distributed	Interest Charged	Penalty Distributed
4/01/2013	04/01/2013	Monthly Obligation	400.00								
3/25/2013	03/26/2013	Income Withholding		95.38				5.16			
3/18/2013	03/20/2013	Income Withholding		101.54							
3/11/2013	03/12/2013	Income Withholding		101.54							
3/12/2013	03/12/2013	Manual Arrears Adjustment									
3/04/2013	03/07/2013	Income Withholding		101.54							
3/01/2013	03/01/2013	Monthly Obligation	400.00								
2/28/2013	02/28/2013	Month end accrual of Interest/Penalty			196.92						
2/26/2013	02/27/2013	Income Withholding		101.54							
2/19/2013	02/20/2013	Income Withholding		101.54							
2/01/2013	02/01/2013	Monthly Obligation	400.00								
1/31/2013	01/31/2013	Month end accrual of Interest/Penalty			196.92						
1/31/2013	01/31/2013	Month end accrual of Unpaid Support			196.92						
1/16/2013	01/16/2013	Income Withholding		101.54							
1/04/2013	01/07/2013	Income Withholding		101.54							
2/31/2012	01/03/2013	Income Withholding						5.16			
1/03/2013	01/03/2013	Month end accrual of Interest/Penalty									
2/31/2012	01/03/2013	Income Withholding									
1/01/2013	01/01/2013	Monthly Obligation	400.00	95.38							
2/31/2012	12/31/2012	Month end accrual of Interest/Penalty									
2/31/2012	12/31/2012	Month end accrual of Unpaid Support			95.38						
2/27/2012	12/28/2012	Income Withholding		101.54							
2/20/2012	12/14/2012	Income Withholding		101.54							
2/14/2012	12/12/2012	Income Withholding		101.54							
1/30/2012	12/03/2012	Income Withholding						101.54			
2/01/2012	12/01/2012	Monthly Obligation	400.00								
1/26/2012	11/27/2012	Income Withholding		95.38				6.16			
1/20/2012	11/20/2012	Income Withholding		101.54							
1/13/2012	11/14/2012	Income Withholding		101.54							
1/05/2012	11/07/2012	Income Withholding		101.54							
1/01/2012	11/01/2012	Monthly Obligation	400.00								
0/29/2012	10/31/2012	Income Withholding						101.54			
0/19/2012	10/22/2012	Income Withholding						101.54			

Received Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Future Payment Collected	Future Payment Distributed	Arrears Distributed	Interest Distributed	Interest Charged	Penalty Distributed
0/12/2012	10/15/2012	Income Withholding									
0/05/2012	10/08/2012	Income Withholding		95.38				101.54			
0/01/2012	10/03/2012	Income Withholding		304.62				6.16			
0/01/2012	10/01/2012	Monthly Obligation	400.00								
9/30/2012	09/30/2012	Month end accrual of Interest/Penalty									
9/30/2012	09/30/2012	Month end accrual of Unpaid Support			262.00						
9/18/2012	09/19/2012	Income Withholding		138.00							
9/ 2012	09/01/2012	Monthly Obligation	400.00								
8/31/2012	08/31/2012	Month end accrual of Interest/Penalty									
8/31/2012	08/31/2012	Month end accrual of Unpaid Support			400.00						
8/01/2012	08/01/2012	Monthly Obligation	400.00								
7/31/2012	07/31/2012	Month end accrual of Interest/Penalty									
7/31/2012	07/31/2012	Month end accrual of Unpaid Support			400.00						
7/01/2012	07/01/2012	Monthly Obligation	400.00								
6/30/2012	06/30/2012	Month end accrual of Interest/Penalty									
6/30/2012	06/30/2012	Month end accrual of Unpaid Support			196.92						
6/11/2012	06/13/2012	Income Withholding		101.54							
6/01/2012	06/04/2012	Income Withholding		101.54							
6/01/2012	06/01/2012	Monthly Obligation	400.00								
5/29/2012	05/31/2012	Income Withholding		95.38				6.16			
5/18/2012	05/18/2012	Income Withholding		101.54							
5/11/2012	05/11/2012	Income Withholding		101.54							
5/07/2012	05/09/2012	Income Withholding		101.54							
5/ 2012	05/01/2012	Monthly Obligation	400.00								
4/30/2012	04/30/2012	Month end accrual of Interest/Penalty									
4/30/2012	04/30/2012	Month end accrual of Unpaid Support			400.00						
4/01/2012	04/01/2012	Monthly Obligation	400.00								
3/31/2012	03/31/2012	Month end accrual of Interest/Penalty									
3/31/2012	03/31/2012	Month end accrual of Unpaid Support			196.92						
3/01/2012	03/02/2012	Income Withholding		203.08							
3/01/2012	03/01/2012	Monthly Obligation	400.00								
2/29/2012	02/29/2012	Month end accrual of Interest/Penalty									
2/29/2012	02/29/2012	Month end accrual of Unpaid Support			196.92						
2/13/2012	02/14/2012	Income Withholding		203.08							

Received Date	Transaction Date	Description	Monthly Obligation	Current Distributed	Current Unpaid Support	Future Payment Collected	Future Payment Distributed	Arrears Distributed	Interest Distributed	Interest Charged	Pen Distri
2/01/2012	02/01/2012	Monthly Obligation	400.00								
1/27/2012	01/27/2012	Income Withholding		196.92				6.16			
1/17/2012	01/18/2012	Income Withholding		203.08							
1/01/2012	01/01/2012	Monthly Obligation	400.00								
2/31/2011	12/31/2011	Month end accrual of Interest/Penalty			95.39						
2/31/2011	12/31/2011	Month end accrual of Unpaid Support									
2/2 211	12/23/2011	Income Withholding		203.08							
2/01/2011	12/02/2011	Unemployment Insurance Benefit Payment		101.53							
2/01/2011	12/01/2011	Monthly Obligation	400.00								
1/30/2011	11/30/2011	Month end accrual of Interest/Penalty									
1/30/2011	11/30/2011	Month end accrual of Unpaid Support			95.41						
1/21/2011	11/22/2011	Unemployment Insurance Benefit Payment		101.53							
1/14/2011	11/15/2011	Unemployment Insurance Benefit Payment		101.53							
1/07/2011	11/08/2011	Unemployment Insurance Benefit Payment		101.53							
1/01/2011	11/01/2011	Month end accrual of Interest/Penalty									
0/31/2011	11/01/2011	Unemployment Insurance Benefit Payment		101.54							
0/31/2011	10/31/2011	Month end accrual of Interest/Penalty	400.00								
0/31/2011	10/31/2011	Month end accrual of Unpaid Support			400.00						
0/20/2011	10/20/2011	Monthly Obligation	400.00								
0/20/2011	10/20/2011	Order Entry									
<b>Totals</b>											

## INCOME VERIFICATION COVER SHEET

Date 08/26/2014  
Client Name JENNIFER E GORDON  
SSN

CHILD SUPPORT CASES	PAYOR/PROVIDER	Payments received during the period SEPTEMBER 2013 through AUGUST 2014
905053200A	MATTHEW ROBERT GEIGER	Yes (see form attached)

PUBLIC ASSISTANCE CASES	PAYEE/HEAD OF HOUSEHOLD	Grants paid during the period SEPTEMBER 2013 through AUGUST 2014
	JENNIFER E GORDON	No

DISTRICT ATTORNEY  
FAMILY SUPPORT DIVISION  
1900 E. FLAMINGO RD SUITE 100  
LAS VEGAS NV 89119

## CHILD SUPPORT / ALIMONY INCOME VERIFICATION FORM

Date 08/26/2014  
Client Name JENNIFER E GORDON  
SSN

Child Support / Alimony verification for period

SEPTEMBER 2013 through AUGUST 2014

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)
SEP 2013	\$ 498.46	\$ 0.00
OCT 2013	\$ 691.78	\$ 0.00
NOV 2013	\$ 931.84	\$ 0.00
DEC 2013	\$ 931.83	\$ 0.00
JAN 2014	\$ 1,346.00	\$ 0.00
FEB 2014	\$ 1,333.17	\$ 0.00
MAR 2014	\$ 1,954.34	\$ 0.00
APR 2014	\$ 1,242.34	\$ 0.00
MAY 2014	\$ 133.11	\$ 0.00
JUN 2014	\$ 0.00	\$ 0.00
JUL 2014	\$ 1,300.00	\$ 0.00
AUG 2014	\$ 0.00	\$ 0.00

FRANCIS MOSS  
CHILD SUPPORT ENFORCEMENT



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## EXHIBIT 7

1 OSC  
Steven B. Wolfson, District Attorney  
2 Nevada Bar No. 001563  
Family Support Division  
3 1900 East Flamingo Road, Suite 100  
Las Vegas, Nevada 89119-5168  
(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)  
4 Dept. T  
UPI-905053200A  
5

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

8 Jennifer Gordon,  
Aka Jennifer Elise Gordon,

Petitioner,

9  
10 vs.

11 Matthew Geiger,

12  
13 Respondent.

Case no. R-13-176576-R

Dept. no. CHILD SUPPORT

14 **ORDER TO SHOW CAUSE WHY RESPONDENT SHOULD NOT BE**  
**FOUND IN CONTEMPT AND ORDER APPOINTING CHILD SUPPORT MASTER**

15 To: Matthew Geiger, Respondent above named:

16 You are hereby ordered to appear before the above-entitled court, (UIFSA Child Support  
17 Courtroom in the Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas,  
18 Nevada) on the OCTOBER 27, 2014 @1:45PM IN CRT RM 1; then and  
19 there to show cause, if any, why you should not be found in contempt for willfully disobeying a Court  
20 Order, filed and registered, if applicable; the alleged disobedience is more fully described in the  
21 Declaration in Support of Order to Show Cause Re: Contempt filed herein, a copy of which is being  
22 concurrently served upon you with a copy of this order.

23 The court hereby finds that the nature of the matter set forth herein is such that it should be  
24 referred to a Child Support Master, and good cause appearing therefore:

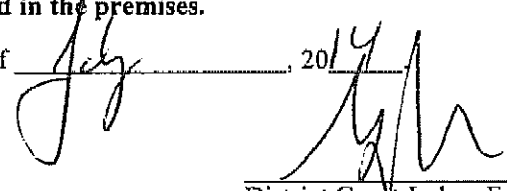
25 It is further ordered that all of the issues, both factual and legal, are referred to a Child Support  
26 Master who will hear the evidence and report the findings of fact, conclusions of law, and  
27 recommendations to the District Court in the manner provided in **Eighth Judicial District Court Rule**  
28 **1.40.**

CAC/AV

1 The focus of the hearing will be your ability to pay. If you are looking for work, bring a list  
2 of places where you have applied for work within the last 30 days. If you are unable to work due  
3 to a physical or mental disability, bring a doctor's letter that describes your condition and its  
4 impact on your ability to work.

5 Pursuant to Chapter 22 of the Nevada Revised Statutes, a finding of contempt may result in  
6 a jail sentence being stayed or imposed (25 days) to be served by you in the Clark County  
7 Detention Center. Your failure to appear at the time, date, and place set forth herein may result  
8 in the issuance of a Bench Warrant for your arrest and for such other and further relief as the  
9 District Court deems justified in the premises.


10 Dated this 15<sup>th</sup> day of July, 2014

11   
12 District Court Judge, Family Division

13 GAYLE NATURNI

14 Submitted by:

15 Steven B. Wolfson  
16 Clark County District Attorney  
Nevada Bar #001565

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18 Deputy District Attorney  
19 Family Support Division

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23 \*All payments made by mail MUST be made in the form of cashier's check, money order or business  
24 check ONLY, made payable to State Collection and Disbursement Unit (SCaDU) and mailed to State  
25 Collection and Disbursement Unit (SCaDU), P.O. Box 98950, Las Vegas, Nevada 89193-8950.  
26 Payments also may be made in person at State Collection and Disbursement Unit, 1900 East Flamingo  
27 Road, Las Vegas, Nevada, in the exact amount of cash, cashier's check, money order or business check  
28 ONLY. 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 custodian (first and last  
name of person receiving child support). NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS  
PAID DIRECTLY TO THE PETITIONER.

Steven B. Wolfson, District Attorney, Nevada Bar No. 001565  
Family Support Division  
1900 East Flamingo Road #100  
Las Vegas, Nevada Child Support Center of Southern Nevada  
(702) 471-9200 - TDD (702) 471-7436 (for the hearing impaired)

CSC:IV

1 CERT

Case no. R-13-176576-R

2 CERTIFICATE OF MAILING

3 The foregoing Order to Show Cause Why Respondent Should Not Be Found in Contempt and  
4 Order Appointing Child Support Master was served upon Jennifer E Gordon by mailing a copy thereof,  
5 first class mail, postage prepaid to:

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

10 on the \_\_\_\_\_ day of AUGUST 27, 2014, 20\_\_\_\_.



11 \_\_\_\_\_  
12 Employee, Office of the District Attorney  
13 Family Support Division  
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## EXHIBIT 8

Individual Usage Details for:  
Jennifer Gordon | 702.234.9673

Billing period: Jul 10, 2014 - Aug 09, 2014  
Showing details for Text usage

Totals for this billing period: 309 messages \$1.25

Date/Time	Contact	Usage Type	Charge (\$)
08/01/2014 04:53PM	702.449.3506	Text/instant messaging	0.00
08/01/2014 04:52PM	702.449.3506	Text/instant messaging	0.00
08/01/2014 04:52PM	702.449.3506	Text/instant messaging	0.00
08/01/2014 08:32AM	702.755.4532	Text/instant messaging	0.00
07/31/2014 10:04AM	702.449.3506	Text/instant messaging	0.00
07/31/2014 08:33AM	702.443.0101	Text/instant messaging	0.00
07/31/2014 08:33AM	702.449.3506	Text/instant messaging	0.00
07/29/2014 01:19PM	702.501.9311	Text/instant messaging	0.00
07/28/2014 08:58PM	702.755.4532	Text/instant messaging	0.00
07/28/2014 08:58PM	702.755.4532	Text/instant messaging	0.00
07/28/2014 06:55PM	702.330.6085	Multimedia messaging	0.00
07/27/2014 04:21PM	75973	Text/instant messaging	0.00
07/27/2014 03:47PM	702.449.3506	Text/instant messaging	0.00
07/27/2014 03:41PM	702.443.0101 matthew	Text/instant messaging	0.00
07/27/2014 03:41PM	702.449.3506 Debbie	Text/instant messaging	0.00
07/27/2014 02:04PM	702.443.0101 matthew	Text/instant messaging	0.00
07/27/2014 02:04PM	702.449.3506 Debbie	Text/instant messaging	0.00
07/26/2014 06:19PM	75973	Text/instant messaging	0.00
07/25/2014 03:19PM	702.908.9043	Text/instant messaging	0.00
07/25/2014 03:19PM	702.908.9043	Text/instant messaging	0.00
07/25/2014 03:18PM	702.908.9043	Text/instant messaging	0.00
07/25/2014 03:18PM	702.908.9043	Text/instant messaging	0.00
07/25/2014 03:18PM	702.908.9043	Text/instant messaging	0.00
07/25/2014 03:17PM	702.908.9043	Text/instant messaging	0.00
07/25/2014 03:17PM	702.908.9043	Text/instant messaging	0.00

# Individual Usage Details for: Jennifer Gordon | 702.234.9673

**Billing period:** Jul 10, 2014 - Aug 09, 2014  
Showing details for Talk usage

**Totals for this billing period:** 290 calls 1411 minutes \$0.00

Date/Time	Contact	Location	Call Type	Minutes	Charge (\$)
07/31/2014 10:16PM	913.707.8578	Kansascity, KS	M2AM	2	0.00
07/31/2014 02:56PM	702.456.3668	Las Vegas, NV	RM70	3	0.00
07/31/2014 02:54PM	888.797.5580	Toll Free, CL	RM70	3	0.00
07/31/2014 02:51PM	702.485.5300	Las Vegas, NV	RM70	3	0.00
07/31/2014 02:49PM	702.732.9027	Las Vegas, NV	RM70	2	0.00
07/31/2014 02:33PM	800.433.2750	Toll Free, CL	RM70	15	0.00
07/31/2014 02:27PM	702.438.4692	Las Vegas, NV	RM70	5	0.00
07/31/2014 02:20PM	866.460.2471	Toll Free, CL	RM70	7	0.00
07/31/2014 12:37PM	702.948.8788	Las Vegas, NV	RM70	3	0.00
07/31/2014 09:54AM	702.799.3500	Las Vegas, NV	RM70	2	0.00
07/30/2014 01:12PM	702.967.1700	Las Vegas, NV	RM70	2	0.00
07/30/2014 09:39AM	702.639.1210	Las Vegas, NV	RM70	3	0.00
07/29/2014 08:17PM	800.950.5762	Incoming, CL	RM70	3	0.00
07/29/2014 02:14PM	702.435.9679	Las Vegas, NV	RM70	3	0.00
07/29/2014 01:39PM	765.896.8951	Incoming, CL	RM70	23	0.00
07/29/2014 12:58PM	877.322.8228	Toll Free, CL	RM70	8	0.00
07/29/2014 12:56PM	800.685.1111	Toll Free, CL	RM70	2	0.00
07/29/2014 12:55PM	800.685.1111	Toll Free, CL	RM70	2	0.00
07/28/2014 03:30PM	702.671.3629	Las Vegas, NV	RM70	2	0.00
07/28/2014 02:56PM	702.513.0408	Las Vegas, NV	M2AM	3	0.00
07/28/2014 02:24PM	702.596.3097	Incoming, CL	M2AM	15	0.00
07/28/2014 12:58PM	775.684.2612	Carsoncity, NV	RM70	1	0.00
07/28/2014 12:22PM	702.617.2117	Incoming, CL	RM70	3	0.00
07/28/2014 11:08AM	702.523.5694	Las Vegas, NV	M2AM	37	0.00
07/28/2014 10:12AM	702.523.5694	Las Vegas, NV	M2AM	6	0.00

07/3/2014	10:11AM	775.684.2612	Carsoncity, NV	RM70	1	0.00
07/3/2014	10:02AM	765.896.8951	Muncie, IN	RM70	1	0.00
07/3/2014	09:18AM	702.267.4970	Las Vegas, NV	RM70	1	0.00
07/3/2014	07:39AM	702.493.4456	Las Vegas, NV	M2AM	12	0.00
07/7/2014	03:47PM	913.707.8578	Incoming, CL	M2AM	14	0.00
07/7/2014	03:43PM	913.707.8578	Incoming, CL	M2AM	4	0.00
07/7/2014	03:25PM	913.707.8578	Kansascity, KS	M2AM	2	0.00
07/7/2014	03:19PM	702.596.3097	Las Vegas, NV	M2AM	3	0.00
07/7/2014	02:44PM	775.684.2612	Carsoncity, NV	UNW9	2	0.00
07/2/2014	02:35PM	702.449.3506	Call Wait	M2AM	5	0.00
07/2/2014	02:33PM	702.376.1078	Call Wait	M2AM	2	0.00
07/2/2014	02:32PM	702.376.1078	Las Vegas, NV	M2AM	2	0.00
07/2/2014	02:31PM	702.564.9529	Las Vegas, NV	UNW9	1	0.00
07/2/2014	02:30PM	702.449.3506	Las Vegas, NV	M2AM	2	0.00
07/2/2014	02:26PM	702.671.5769	Incoming, CL	UNW9	4	0.00
07/2/2014	02:10PM	702.328.1910	Las Vegas, NV	M2AM	2	0.00
07/2/2014	12:34PM	913.707.8578	Kansascity, KS	M2AM	9	0.00
07/26/2014	03:46PM	913.579.5659	Kansascity, KS	M2AM	2	0.00
07/26/2014	03:42PM	913.579.5659	Incoming, CL	M2AM	2	0.00
07/26/2014	03:38PM	913.707.8578	Kansascity, KS	M2AM	1	0.00
07/26/2014	02:46PM	913.707.8578	Kansascity, KS	M2AM	1	0.00
07/26/2014	02:01PM	913.707.8578	Kansascity, KS	M2AM	1	0.00
07/26/2014	01:11PM	913.707.8578	Kansascity, KS	M2AM	1	0.00
07/26/2014	10:53AM	702.296.9714	Las Vegas, NV	M2AM	2	0.00
07/26/2014	10:45AM	702.617.2100	Las Vegas, NV	UNW9	8	0.00

M2AM = Unlimited Mobile to Any Mobile RM70 = 700 Anytime w/Rollover Shared UNW9 = Unlimited Night & Weekend CW = Call Waiting M2AM = Mobile to Any Mobile

Incoming Call      Outgoing Call



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## EXHIBIT 9

ORIGINAL

FILED IN OPEN COURT

NOV 01 2010

DISTRICT COURT  
CLARK COUNTY, NEVADA

STEVEN D. GRIERSON  
CLERK OF THE COURT

MATTHEW GEIGER,

BY

*Victoria Pott*

VICTORIA POTT

DEPUTY

Plaintiff

vs

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

JENNIFER GORDON,

Defendant

PARTIAL PARENTING AGREEMENT

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

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

LEGAL CUSTODY PROVISIONS

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

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

RECORDED

SEP 24 2010

DISTRICT COURT

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

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

## OBTAINING INFORMATION

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

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

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

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

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PARENTING TIME-SHARE PROVISIONS

The parents agree that each week the children shall reside with the mother beginning Sunday at 7:00 p.m. and concluding Friday at 7:00 p.m., and with the father beginning Friday at 7:00 p.m. and concluding Sunday at 7:00 p.m. The parents further agree that that until the Court lifts the order for supervised visitations for the father, the father's parenting time with the children shall be supervised by a person mutually agreed upon by the parties.

HOLIDAYS

Holidays and special times shall take precedence over all other time-share arrangements. The parents agree that the children shall spend each holiday with one of their parents each year, which shall be determined based upon mutual agreement of the parties. In the event the parents do not agree, the holidays shall be alternated on a yearly basis, with the children residing with the father in odd-numbered years and with the mother in even-numbered years. The parents further agree that until the Court lifts the order for supervised visits for the father, the father's holiday time with the children shall be supervised by a person mutually agreed upon by the parties.

Fourth of July

The parents agree that the Fourth of July shall be defined as beginning July 3 at 7:00 p.m. and concluding July 4 at a time mutually agreed upon by the parties.

Thanksgiving

The parents agree that Thanksgiving shall be defined as beginning the Wednesday preceding Thanksgiving Day at 7:00 p.m. and concluding the Sunday following Thanksgiving Day at 7:00 p.m.

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Christmas

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

Father's Day

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

Children's Birthdays

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

VACATION

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

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

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.

ADDITIONAL TIME

The parents agree that any additional time with the children or changes in the parenting schedule shall be arranged by mutual agreement.

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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.

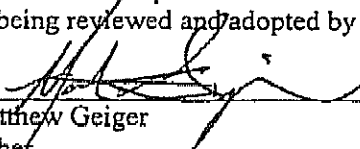
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...

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.

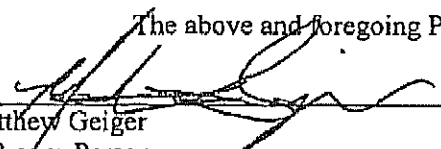
11                      
12 Matthew Geiger  
13 Father

14                      
15 Jennifer Gordon  
16 Mother

17                    DATE 9-22-10

18                    DATE 09-22-10

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

20                      
21 Matthew Geiger  
22 In Proper Person

23                      
24 Jennifer Gordon  
25 In Proper Person

26                    DATE 9-22-10

27                    DATE 09-22-10

28                                    ORDER

29                    Based upon the agreement of the parties and good cause being shown, IT IS  
30 HEREBY ORDERED that the terms and conditions of the above Partial Parenting Agreement are  
31 adopted.

32                    DATED this 1 day of November, 2010.

33                      
34 District Court Judge

---

## EXHIBIT 10



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint**

**COURT MINUTES**

December 14, 2010

---

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

---

**December 14, 2010    1:30 PM**

**Evidentiary Hearing**

**HEARD BY:**    Giuliani, Cynthia N.

**COURTROOM:**    Courtroom 06

**COURT CLERK:**    Carol Critchett

**PARTIES:**

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

<b>JOURNAL ENTRIES</b>
------------------------

- Court called the case and reviewed the issues.

Argument by Plaintiff. He requested the children be re-interviewed. He stated the children are unhappy with Defendant's new boyfriend.

Argument by Defendant regarding Plaintiff discussing the case with the children.

Arguments regarding the children's wrestling, Defendant's new boyfriend, and Plaintiff's violation of the Protective Order.

.....  
Discussion regarding procedures for the Evidentiary Hearing.

**OPENING STATEMENTS.**

Testimony and exhibits presented. (See worksheets).

<b>PRINT DATE:</b> 08/04/2014	<b>Page 7 of 16</b>	<b>Minutes Date:</b> August 30, 2010
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Plaintiff presented his camera, with pictures he represented were of Defendant's home, to the Court as evidence of Defendant's living conditions.

Discussion regarding the Issues.

COURT ORDERED, parties shall share JOINT LEGAL CUSTODY. Parties shall ABIDE by the JOINT LEGAL CUSTODY provisions. DEFENDANT shall place PLAINTIFF'S CONTACT INFORMATION on the children's SCHOOL RECORDS and DOCTOR RECORDS. Parties shall COOPERATE with any INFORMATION or DECISIONS needed involving the children.

Parties shall COMMUNICATE through ELECTRONIC MAIL (EMAIL) or TEXT MESSAGING.

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

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

Parties are referred for a CHILD INTERVIEW for both children. The children's COUNSELOR shall CONDUCT the CHILD INTERVIEW then SEND A REPORT to the COURT 10 DAYS PRIOR to the NEXT HEARING.

Parties are ADMONISHED NOT TO COACH the CHILDREN for the INTERVIEW.

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

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

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

Parties are ADMONISHED to ABIDE by the previously issued BEHAVIOR ORDER and NOT

PRINT DATE:	08/04/2014	Page 8 of 16	Minutes Date:	August 30, 2010
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DISPARAGE each other in the PRESENCE of the CHILDREN.

PLAINTIFF shall receive the FIRST WEEK of the 2010 CHRISTMAS HOLIDAY from after school on FRIDAY, DECEMBER 17, 2010, until SUNDAY, DECEMBER 26, 2010.

DEFENDANT shall receive the SECOND WEEK of the 2010 CHRISTMAS HOLIDAY from SUNDAY, DECEMBER 26, 2010 until SUNDAY, JANUARY 01, 2011.

PLAINTIFF shall PREPARE and FILE an UPDATED FINANCIAL DISCLOSURE FORM (FDF).  
PLAINTIFF shall SERVE a COPY to DEFENDANT.

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

PLAINTIFF shall PROVIDE PROOF of the CHILD SUPPORT PAYMENTS to DEFENDANT via MAILING, and also to the COURT by way of a COURTESY COPY of the DOCUMENT or DOCUMENTS sent to DEFENDANT.

PLAINTIFF shall pay CHILD SUPPORT in the amount of 25% of his GROSS MONTHLY INCOME for the 2 children. Upon PROOF of any UNEMPLOYMENT or INCOME CHANGE the CHILD SUPPORT may be MODIFIED to the STATUTORY MINIMUM of \$100.00 per month per child or 25% of the GROSS MONTHLY UNEMPLOYMENT INCOME.

PLAINTIFF shall PREPARE the ORDER.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

*Canceled: March 09, 2011 11:00 AM Return Hearing*

*Canceled: August 20, 2013 10:00 AM Order to Show Cause*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - Moot  
Nathan, Gayle  
Courtroom 14  
Tait, Lucinda*

*Canceled: September 17, 2013 10:00 AM Motion*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated  
Nathan, Gayle  
Courtroom 14  
Tait, Lucinda*

*Canceled: December 31, 2013 9:30 AM Motion for Order to Show Cause*

*Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - per Law  
Clerk*

PRINT DATE:	08/04/2014	Page 9 of 16	Minutes Date:	August 30, 2010
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## EXHIBIT 11

DISTRICT COURT  
CLARK COUNTY, NEVADA

## Divorce - Complaint

COURT MINUTES

March 29, 2011

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

March 29, 2011      3:00 PM      Return Hearing

HEARD BY: Nathan, Gayle

**COURTROOM:** RJC Courtroom 10A

**COURT CLERK:** Lucinda Tait

**PARTIES:**

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

## JOURNAL ENTRIES

- RETURN HEARING: RETURN CHILD INTERVIEW

COURT CLOSED HEARING.

Defendant (mother) Jennifer Elise Gordon present. Lynn Conant, Appointed Guardian Ad Litem for children also present.

Mother reported both boys are now in counseling and she has met and spoken with Lynn Conant a couple of times since she was appointed.

Mother requested further direction from Court regarding the children's sessions with Counselor. Judge Nathan advised the previous Judge assigned to this matter asked the Counselor to interview the children on certain issues. This court has taken it upon herself to interview the children, therefore, the Court does NOT need a report on Therapeutic counseling, but would like dates of sessions.

PRINT DATE:	08/04/2014	Page 1 of 15	Minutes Date:	March 29, 2011
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COURT ORDERED, mother to provide RELEASE for Attorney Conant, so that the Therapist may speak to her regarding the children.

Court expressed its frustration over the fact that father is not present for today's hearing.

Attorney Conant advised she, mother and the boys will be going out tomorrow for pizza, then on one of father's evenings with the children, they will also go out for pizza. Ms. Conant plans on taking the children out alone after the two outings with the parents.

Court discussed her 3/18/11 Interview with Westin and Chevy on the record. Court told mother that Westin told her he was said all the time, but he wants to be happy. Being with his dad makes him happy. Westin also said he does NOT like wrestling and does NOT want to do it anymore. Both children said that being with father makes them happy.

Following discussion, COURT ORDERED:

- 1) Westin is NOT to be engaged in any wrestling activities any longer;
- 2) Boys shall sleep on a bed, pullout sofa or a futon, they are NOT to sleep on the floor;
- 3) Matzi aka Baron is NOT to physically discipline Westin and Chevy in anyway;
- 4) Parents are NEVER EVER to use a belt on children again;
- 5) Any unreimbursed medical expenses shall be borne equally (50/50) between the parties subject to the 30/30 rule whereby the party incurring the expense shall have 30 days to submit the bill to the other party and that party will have 30 days to reimburse the party incurring the expense for one-half the bill.

Mother requested Court NOT to give father ONE more overnight visit with the boys, after discussion, Court advised it will NOT entertain such until a psych evaluation is received on father.

Court advised it WILL obtain any CPS records and do an in Camera inspection.

ALL Future hearings STAND.

Court ORDERED the Minutes from this hearing shall stand as the ORDER and a copy shall be mailed to the parties at the following addresses:

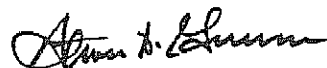
Matthew R. Geiger, 8669 Horizon Wind Avenue #103, Las Vegas, NV 89178

Jennifer E. Gordon, 4047 Meadow Foxtail Drive, Las Vegas, NV 89122

PRINT DATE:	08/04/2014	Page 2 of 15	Minutes Date:	March 29, 2011
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## EXHIBIT 12

  
CLERK OF THE COURT

1 MISC

2 (Your Name) Jennifer Gordon

3 (Address) 911 Autumn Day Street  
4 Henderson, NV 89012

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

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

10 Matthew Geiger, )  
11 )

12 Plaintiff, )

13 vs. )

14 Jennifer Gordon, )

15 Defendant. )  
16 )  
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22 )

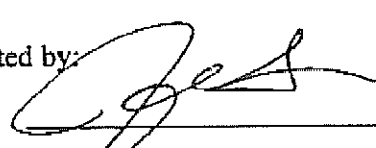
CASE NO.: D-10-430-639-0

DEPT. NO.: T

23 Affidavit of Margaret Pickard

24 Title of Document

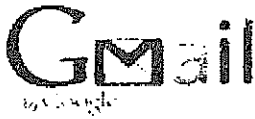
25 Respectfully submitted by:

26 (Your signature) 

27 (Your name) Jennifer Gordon

28 ☐ Plaintiff / ☒ Defendant In Proper Person





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## Fwd: Cooperative Parenting

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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@gmalls.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

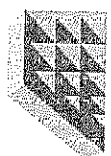
Adjunct Faculty  
University of Nevada, Las Vegas  
Duke University  
University of California, Davis

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

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## EXHIBIT 13



Nevada  
Neurosciences  
Institute  

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at Sunrise

August 26, 2014

To Whom It May Concern,

Chevy Geiger has been a patient in our practice since November 2012. He was referred to our clinic with a known history of Chiari I Malformation and persistent headaches. He then underwent surgical repair of his Chiari on July 1, 2012. Surgery was complicated by development of a wound infection and wound revision surgery was completed on July 16, 2012. His recovery from surgery has been difficult due to issues with persistent headaches, nausea and vomiting which had been quite severe and ongoing for several months. He continues to follow up on a regular basis at our clinic with his mother as his primary care-giver. He will need continued follow up with our clinic on an ongoing basis as he goes through childhood.

If you have any further questions regarding this matter, please feel free to contact my office at the number below.

Sincerely,

A handwritten signature in cursive script that reads "K Schmidt MD".

Kelly Schmidt, MD

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## EXHIBIT 14



Elise433@gmail.com

---

## Geiger, Matthew C262424 Probation Status

---

Michael LaPutt <mlaputt@dps.state.nv.us>

Tue, Aug 19, 2014 at 6:51 AM

To: "Elise433@gmail.com" <Elise433@gmail.com>

Mrs. Gordon,

With regards to Mr. Geiger's performance on probation with regards to your Family Court Case:

He was brought back for revocation process due to his absconding from probation. The violation report and bench warrant were received by District Court Department 25 on 10/23/2013. He was eventually arrested on 7/26/14 and brought back in front of Judge Delaney for revocation procedures. The Division was seeking revocation. Unfortunately, the matter was negotiated by the District Attorney and the Defense Attorney without the input of the Division. He was reinstated to probation on 8/18/14. The following is an update of his special conditions:

1. Search clause.
2. Enter and successfully complete substance abuse counseling and submit to UA's upon request. Completed at Dignoticare 12/10/11
3. Have no use, possession or control of alcohol. Violated 9/28/12 resulting in an arrest. After further research, the Division decided to allow him to continue with probation.
4. Complete 16 hours of community service work EACH MONTH of probation. Has claimed to have performed CSW but has not provided verification.
5. Maintain full time employment. He has not provided any verification of being employed since he absconded from probation in October 2013
6. Submit to genetic markers testing and pay a \$150 fee to the Clerk of the Court. Collected but has not paid the fee.

\$840 Supervision Fee Balance Outstanding

\$235 Court Fee Balance Outstanding

Mr. Geiger is in the process of being transferred to a General Supervision Caseload from the Administrative Bank Caseload. I will be his officer until the transfer is complete. Should you have any further questions or should the Family Court have any further questions, please feel free to call me.

Sincerely,

Probation Officer Mike La Putt

702-486-3648



Elise433@gmail.com

---

## Geiger, Matthew C262424 Probation Status

---

Michael LaPutt <mlaputt@dps.state.nv.us>

Tue, Aug 19, 2014 at 6:54 AM

To: "Elise433@gmail.com" <Elise433@gmail.com>

Correction on community service work. He provided verification for CSW performed October 2011 and March 2011 but has not provided any verification since.

Probation Officer La Putt

---

From: Michael LaPutt

Sent: Tuesday, August 19, 2014 6:51 AM

To: Elise433@gmail.com

Subject: Geiger, Matthew C262424 Probation Status

[Quoted text hidden]

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

Hearing Date: October 3, 2014  
Hearing Time: 9 :00 a.m.

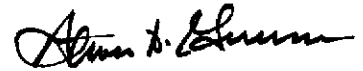
*Peter Bellon*  
Peter Bellon, Esq.  
732 South Sixth Street, #102  
Las Vegas, NV 89101  
Attorney for Plaintiff



*Allen D. Lerner*  
CLERK OF THE COURT

## 541

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

  
CLERK OF THE COURT

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

MATTHEW GEIGER	)	
	)	
Plaintiff,	)	CASE NO. D-10-430639-D
	)	DEPT. NO. T
vs.	)	
	)	
JENNIFER GORDON,	)	
	)	
	)	
Defendant.	)	

DEFENDANT'S WITNESS LIST AND PRODUCTION OF DOCUMENTS

PURSUANT TO NRCP 16.2

COMES NOW, Defendant, Jennifer Gordon, in proper person, and herewith files her  
WITNESS LIST AND PRODUCTION OF DOCUMENTS, as follows:

WITNESSES

1. JENNIFER GORDON

91 Autumn Day Street  
Henderson, NV 89012  
(702) 234-9673

Jennifer will testify regarding her knowledge of the facts and circumstances  
surrounding this case.

2. MATTHEW GEIGER

8659 Horizon Wind Ave. #102

Las Vegas, NV 89178

(702) 443-0101

Matthew will testify regarding his knowledge of the facts and circumstances surrounding this case.

3. JEREMY RICHTER

1761 Curio Ter

Henderson, NV 89074

(702) 328-1910

Jeremy is a friend of the defendants, and a coach to Weston and Chevy. He can testify to the relationship Jennifer has with the children, as well as the boys social relationships with other children; including his own child. He can also testify to the differences with the boys before visitations with their father, and after visitations began in regards to their wrestling schedules, practices, and tournaments.

4. LUCY ATILANO

7249 Eagles Pride Street

Las Vegas, NV 89148

(702) 696-8886

Lucy is and has been a friend to the plaintiff and defendant for several years now. She will testify that she now works for the ironworkers local 433 as the secretary at the union hall. She will testify that she knew both parties long before she had any affiliation with the union. She will testify that the defendant has not in any way, shape, or form, ever said any negative remarks about plaintiff at the union hall. She can testify that all work orders go through her, and that the defendant has not ever

interfered with plaintiff's ability to work. She can testify that the defendant's priority is her children.

5. CRYSTAL MAESTAS

190 Mount Earl Ave.  
Henderson, NV 89012  
(702) 330-6085

Crystal is a friend of the defendants but also watches the children from time to time. She can testify to Jennifer's involvement with the boys' sports and Jennifer's involvement with her own children's wrestling. She will testify to the children's participation in Band and the various busy schedules that Jennifer has on a consistent basis because of her involvement with the children's school and extracurricular activities. Crystal can also testify to Jennifer's financial hardships and the stress that she sees from Jennifer when dealing with court and trying to balance out family time with multiple problems from the plaintiff.

6. Defendant reserves the right to name additional witnesses with relevant knowledge or information, as they become known.

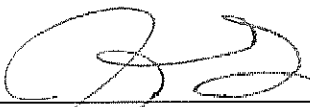
7. Defendant reserves the right to call any witnesses named by Plaintiff.

**DOCUMENTS**

A.	September 12, 2014 text messages- Matthew, Jennifer, Debbie
B.	Text messages given to Officer La Putt
C.	Child Support Arrears, NCP Financial Transaction History, Income Verification Form
D.	Child Support DA's Order To Show Cause
E.	Child Support DA's Motion to Modify
F.	Phone records/text records 7/26/14
G.	Email from Margaret Pickard 06/05/14
H.	Letter from Neurosurgeon Dr. Kelly Schmidt
I.	Email from Officer La Putt 08/19/2014
J.	Plaintiffs Psychological Evaluation

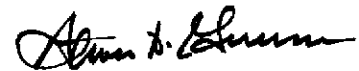
K	Register of Actions: Probation conditions for Plaintiff
L.	Register of Actions: Bench Warrant issue date and Probation Violation Report date
M.	Notice of Suspension for Weston 01/30/14
N.	Notice of Required Parent Conference/Temporary Removal from School for Chevy 11/18/13
O.	TPO that included the Child Support first issued and other stipulations 05/26/10
P.	Email to Mr. Bellon with Chevys headache/vomiting log
Q.	Chevys medical records 11-27-12 through 04-01-14
R.	Open Arms client no-show letter
S.	May 1, 2014 minutes- Hunter Gun Safety Course
T.	Incident report 246782 1/31/08 suicide attempt
U.	Burglary attempt case # 08025599 9/28/08
V.	Incident report LNL091208000683 suicide attempt and 911 conversation 12/08/2009 marijuana, methadone, oxyconton
W.	Incident report LNL091212000532 family disturbance 12/12/09 911 conversation. Methadone/Oxyconton
X.	Incident report LNL100118000621 family disturbance/suicide attempt with pocket knife 911 conversation 1/18/10
Y.	Incident report LLV110125002603 criminal/ TPO violation 1/25/11 witnesses
Z.	Incident report LLV110606001969 criminal/ threats via text and on facebook from Plaintiff 6/6/11...Copies of texts and facebook conversations

DATED this 17 day of September, 2014.

  
 \_\_\_\_\_  
 Jennifer Gordon  
 91 Autumn Day Street  
 Henderson, NV 89012  
 Elise433@gmail.com  
 (702) 234-9673  
 Defendant in Proper Person

ORIGINAL

Electronically Filed  
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CLERK OF THE COURT

PMEM  
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 :00am

**DEFENDANT'S PRE-TRIAL MEMORANDUM**

Comes now, Defendant, JENNIFER GORDON, in proper person, and herewith submits her pre-hearing memorandum in advance of the evidentiary hearing presently scheduled for October 3, 2014 at 9:00am

I.

STATEMENT OF ESSENTIAL FACTS

A. Parties

Plaintiff: Matthew Geiger  
Defendant: Jennifer Gordon

B. Dates of Marriage/Divorce

Parties were married on August 17, 2005, and divorced September 27, 2011

C. Statement of Unresolved Issues

Legal Custody  
Physical Custody  
Child Support

II.

LEGAL CUSTODY

- A. The parties have two (2) minor child born the issue of their said marriage, WESTON C. GEIGER, born November 11, 2001 and CHEVY W. GEIGER, born August 11, 2004. Weston is currently 12 years old and Chevy is 10.
- B. The parties signed a Partial Parenting Agreement which was filed and ordered in open court on November 1, 2010. The parenting agreement has had many changes since then including the addition of Mothers Day, weekend visitations from Friday at 6pm to Sunday at 6pm, and the Department T's Holiday schedule.
- C. Jennifer has been having communication problems, regarding the children, for several years now. Jennifer has come before the court on multiple occasions due to opposing party not complying with the courts orders. Many orders have been issued because of the Plaintiffs lack of communication with Jennifer, but also because of his OVER communication with the children regarding adult matters.
- D. Plaintiff has failed to notify Jennifer on several occasions about Chevys headaches and vomiting. He refuses to listen to any recommendations Jennifer has given him from the doctors.
- E. Plaintiff does not involve himself with any of the childrens school or with any of the childrens medical appointments therefore he should not be able to make decisions regarding their care and treatment.

III.

PHYSICAL CUSTODY

- A. Plaintiff was granted visitations based on his psychological evaluation, and the presumption that he was "moving forward"...
- B. Plaintiff failed to disclose to the courts that he was not reporting to his probation and that there was a warrant issued for his arrest. Plaintiff lied EXTENSIVELY in his psychological evaluation.

1 C. Plaintiff left the state with the children without telling Jennifer or providing any kind of  
2 itinerary or notice. Plaintiff has done this before and the courts have made several  
3 orders because of this.

4  
5 D. Plaintiff CONTINUES to make disparaging remarks to the children regarding the  
6 defendant, his child support, and his employment...disregarding the numerous court  
7 orders against such; which was one of the multiple reasons supervised visitations were  
8 issued in the first place

9 IV.

10 CHILD SUPPORT

11  
12 A. This is another issue brought before the courts attention multiple times. Many  
13 orders have been issued but not complied with leaving Plaintiff to be held in  
14 contempt not only by the family courts(February 19, 2014), but the child support  
15 district attorneys office has recently filed an Order to Show Cause set for hearing on  
October 27, 2014 at 1:45 pm.

16 B. Plaintiff went around the order from September 16, 2013 and instead of filing for  
17 modification through Department T, he filed through the child support division on  
18 June 19, 2014.

19 C. Plaintiff has failed to pay the correct amounts of his child support for 4 years now.  
20 He has failed to inform Jennifer of his employment, and failed to notify the courts.

21 V.

22 SPOUSAL SUPPORT

23  
24 A. N/A.

25 VI.

26 PROPERTY AND DEBTS

27 A. N/A.  
28



VII.

ATTORNEY'S FEES

- A. Jennifer asks for all attorneys fees that have been previously asked of this court, but was never ruled upon, and any and all attorney and filing fees that may be incurred from this trial.

VIII.

LIST OF WITNESSES

- A. Defendant's list of witnesses is as follows:

1. Defendant; Jennifer Gordon
2. Plaintiff; Matthew Geiger
3. Jeremy Richter, 1761 Curio Ter, Henderson, NV 89074, (702) 328-1910

Jeremy is a friend of the defendants, and a coach to Weston and Chevy. He can testify to the relationship Jennifer has with the children, as well as the boys social relationships with other children; including his own child. He can also testify to the differences with the boys before visitations with their father, and after visitations began in regards to their wrestling schedules, practices, and tournaments.

4. Lucy Atilano, 7249 Eagles Pride street, Las Vegas, NV 89148 (702)696-8886 Lucy is and has been a friend to the plaintiff and defendant for several years now. She will testify that she now works for the ironworkers local 433 as the secretary at the union hall. She will testify that she knew both parties long before she had any affiliation with the union. She will testify that the defendant has not in any way, shape, or form, ever said any negative remarks about plaintiff at the union hall. She can testify that all work orders go through her, and that the defendant has not ever interfered with plaintiffs ability to work. She can testify that the defendant's priority is her children.
5. Crystal Maestas, 190 Mount Earl Ave, Henderson, NV 89012, (702)330-6085 Crystal is a friend of the defendants but also watches the children from time to time. She can testify to Jennifer's involvement with the boys sports and Jennifers involvement with her own childrens wrestling. She will testify to the childrens participation in Band and the various busy schedules that Jennifer has on a consistent basis because of her involvement with the childrens school and extracurricular activities. Crystal can also testify to Jennifer's financial

1 hardships and the stress that she sees from Jennifer when dealing with court and trying to  
2 balance out family time with multiple problems from the plaintiff.

3 VIII.

4 LIST OF EXHIBITS

5

6 Letter	DESCRIPTION OF DOCUMENT
7 A.	September 12, 2014 text messages- Matthew, Jennifer, Debbie
8 B.	Text messages given to Officer La Putt
9 C.	Child Support Arrears, NCP Financial Transaction History, Income Verification Form
10 D.	Child Support DA's Order To Show Cause
11 E.	Child Support DA's Motion to Modify
12 F.	Phone records/text records 7/26/14
13 G.	Email from Margaret Pickard 06/05/14
14 H.	Letter from Neurosurgeon Dr. Kelly Schmidt
15 I.	Email from Officer La Putt 08/19/2014
16 J.	Plaintiffs Psychological Evaluation
17 K.	Register of Actions: Probation conditions for Plaintiff
18 L.	Register of Actions: Bench Warrant issue date and Probation Violation Report date
19 M.	Notice of Suspension for Weston 01/30/14
20 N.	Notice of Required Parent Conference/Temporary Removal from School for Chevy 11/18/13
21 O.	TPO that included the Child Support first issued and other stipulations 05/26/10
22 P.	Email to Mr. Bellon with Chevys headache/vomiting log
23 Q.	Chevys medical records 11-27-12 through 04-01-14
24 R.	Open Arms client no-show letter
25 S.	May 1, 2014 minutes- Hunter Gun Safety Course
26 T.	Incident report 246782 1/31/08 suicide attempt
27 U.	Burglary attempt case # 08025599 9/28/08
28 V.	Incident report LNL091208000683 suicide attempt and 911 conversation 12/08/2009 marijuana, methadone, oxyconton
W.	Incident report LNL091212000532 family disturbance 12/12/09 911

	conversation. Methadone/Oxyconton
X.	Incident report LNL100118000621 family disturbance/suicide attempt with pocket knife 911 conversation 1/18/10
Y.	Incident report LLV110125002603 criminal/ TPO violation 1/25/11 witnesses
Z.	Incident report LLV110606001969 criminal/ threats via text and on facebook from Plaintiff 6/6/11...Copies of texts and facebook conversations

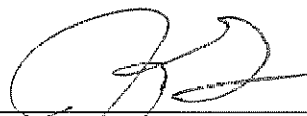
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IX.

#### LENGTH OF TRIAL

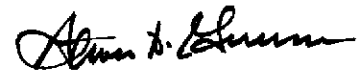
A. Length of Trial: One Half day.

Respectfully Submitted by:



9-17-14

Jennifer Gordon  
 91 Autumn Day Street  
 Henderson, NV 89012  
 Elise433@gmail.com  
 702) 234-9673  
 Defendant in Proper Person



CLERK OF THE COURT

DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*

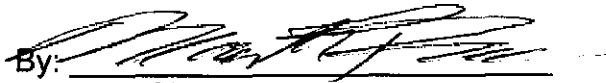
MATTHEW ROBERT GEIGER, PLAINTIFF  
VS.  
JENNIFER ELISE GORDON, DEFENDANT.

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

**NOTICE OF RESCHEDULING OF HEARING**

Please be advised that the date and time of a hearing set before the **Honorable GAYLE NATHAN** has been changed. The **Evidentiary Hearing**, and all matters in this case presently scheduled for **10/03/2014**, at **9:00 AM** have been rescheduled to **9th day of October, 2014 at 1:30 PM.**

**HONORABLE GAYLE NATHAN**



By: Marie Choudhry  
Judicial Executive Assistant

**CERTIFICATE OF MAILING**

I hereby certify that on the above file stamped date:

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

Peter J. Bellon, Esq.  
732 South Sixth Street  
Suite 102  
Las Vegas NV 89101

Jennifer Elise Gordon  
Confidential

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Marie Choudhry  
Judicial Executive Assistant  
Department T

AFFT  
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

  
CLERK OF THE COURT

DISTRICT COURT  
CLARK COUNTY, NEVADA

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

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

AFFIDAVIT OF SERVICE

COMES NOW, Plaintiff, MATTHEW GEIGER, and files the attached  
AFFIDAVIT OF PROCESS SERVER, in the above-captioned matter.

DATED this 3<sup>rd</sup> day of October 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

BELLON & MANINGO, LTD.

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

# Affidavit of Process Server

**MATTHEW ROBERT GEIGER**

**V.**

**JENNIFER ELISE GORDON**

**D430639**

Plaintiff/Petitioner

Defendant/Respondent

CASE NUMBER

I, **JOHN WILKS, #1092**, being first duly sworn, depose and say: that I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to perform said services

Services: I served **OFFICER MICHAEL LA PUTT**

NAME OF PERSON/ENTITY BEING SERVED

with (list of documents) **SUBPOENA**

by leaving with

NAME

RELATIONSHIP/TITLE

( ) Residence

ADDRESS

CITY/STATE

(x) Business **215 E BONANZA LV NV 89101**

ADDRESS

CITY/STATE

On **SEPTEMBER 29, 2014** at **12:05 P.M.**

DATE

TIME

## Manner of Service:

(X) Personal: By personally delivering copies to the person being served; or Agent for Service

( ) Substituted at Residence: By leaving copies at the dwelling house or usual place of abode of the person being served with a member of the household over the age of **14** and explaining the general nature of the papers.

( ) Substituted at Business: By leaving during office hours, copies at the office of the person/entity being served with the person apparently in charge thereof.

( ) Posting: By posting copies in a conspicuous manner to the front door of the property/entity being served, thereafter copies of the documents were mailed by prepaid, first class mail on \_\_\_\_\_, from \_\_\_\_\_

**Non-Service:** After due search, careful inquiry and diligent attempts at the address(es) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):

( ) Unknown address ( ) Moved, left no forwarding ( ) Services Cancelled by Litigant ( ) Unable to service in a Timely Fashion ( ) Address Does Not Exist ( ) Other \_\_\_\_\_

Service Attempts: Service was attempted on: (1) \_\_\_\_\_

(2) \_\_\_\_\_

Date Time

Report

Date

Time

Report

(3) \_\_\_\_\_

(4) \_\_\_\_\_

(5) \_\_\_\_\_

Date Time

Report

Date Time

Report

Date Time

Report

Description: Age **40** Sex **M** Race **HISP** Height **5'8** Weight **170** Hair **BLK** Beard \_\_\_\_\_ Glasses \_\_\_\_\_

Dated: \_\_\_\_\_, 20\_\_\_\_

SUBSCRIBED AND SWORN to before me this

\_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

NOTARY PUBLIC in and for the

County of \_\_\_\_\_ State of \_\_\_\_\_

"I declare under the penalty that the foregoing is true and correct"

OR: THE FOLLOWING: PER NRS 53.045

(a) If executed in this State (NEVADA):

Executed on **SEPTEMBER 30, 2014**

DATE

Signature of Process Server

JOHN WILKS PROCESS SERVING LIC#1092

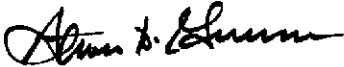
6440 SKY POINTE DR. 140-122

LAS VEGAS, NV 89131

(702) 839-2957

PMEM  
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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	)	DATE OF HEARING: 10-9-14
	)	TIME OF HEARING: 1:30pm

PLAINTIFF'S PRETRIAL MEMORANDUM

COMES NOW, Plaintiff, MATTHEW ROBERT GEIGER, by and through his attorney, PETER J. BELLON, ESQ., of BELLON & MANINGO, LTD., as and for his Pre-Trial Memorandum, states as follows:

I.

STATEMENT OF ESSENTIAL FACTS

- A. Plaintiff: MATTHEW ROBERT GEIGER, age 35 years.  
Defendant: JENNIFER ELISE GORDON, age 34 years.
- B. Date of marriage: August 17, 2005
- C. Resolved Issues: The parties herein have been unable to resolve any of the pending issues with regard to the visitation and support of the minor children as well as



the issues dealing with arrears, medical insurance, contempt and attorney's fees.

## II.

### CHILD CUSTODY AND VISITATION

The parties hereto 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. The parties share joint legal custody of their sons and JENNIFER has primary physical custody subject to MATTHEW'S specific rights of visitation.

While MATTHEW has had problems in his past, he has done everything this court has asked of him and he has moved from reunification, supervised visitation and no overnights to unsupervised visitation, overnights and then even more time following the last two (2) hearings in front of this Honorable Court (January and May 2014).

Unfortunately, JENNIFER has never been happy with MATTHEW having a bigger role in the children's lives and has made things even more difficult than they have to be at this time. Actually, MATTHEW is uncertain exactly what it is that JENNIFER is trying to do here. Despite whatever troubles MATTHEW has had, most of them are behind him and he has stepped up and has been a good fathre to

1 these boys. Removing him from their lives at this point would make  
2 no sense and definitely be contrary to their best interest!

3  
4 Beginning shortly after the January 2014 and May 2014  
5 hearings referenced above, wherein MATTHEW's visitation with his  
6 sons was increased, JENNIFER began some kind of communication with  
7 MATTHEW'S new Probation Officer. It appears that, at best, things  
8 were exaggerated or embellished and this along with some  
9 miscommunication and misunderstanding between MATTHEW and Officer  
10 LaPutt regarding the terms of his probation led to a warrant and  
11 to MATTHEW being arrested and incarcerated for approximately 23  
12 days this summer.

13 Without knowing all the facts, while MATTHEW was  
14 incarcerated, JENNIFER used this time to file another motion with  
15 Family Court in another attempt to take the boys away from their  
16 father. MATTHEW is uncertain how any of what has happened since  
17 the last court order in May 2014 has anything to do with his  
18 visitation being terminated and the boys being torn away from  
19 their father.  
20

21 Regardless, when all the confusion was cleared up, MATTHEW  
22 was released and immediately reinstated on his probation with  
23 little to no new conditions. To date, he has successfully  
24 completed four (4) out of his five (5) years during which time he  
25 has NEVER tested dirty and apparently the only thing standing in  
26 his way of a successful completion is JENNIFER'S continued  
27 involvement in his case.  
28

MATTHEW will testify, as will Officer LaPutt hopefully, that he was even offered an early honorable discharge from probation just recently if he took a drug awareness class and did forty-eight (48) hours of communit service. Clearly, it does not appear that there are any problems that this Court need to be concerned with regarding MATTHEW'S probation or behavior.

In summation, so MATTHEW was picked up on a warrant based on a misunderstanding and he was reinstated to his probation within the month? Should not have JENNIFER waited to see what the outcome was going to be before she filed anything with this Court?

JENNIFER had the children in her custody the day after MATTHEW'S arrest and he clearly was not going to be exercising visitation while in jail. Nothing that occurred changed MATTHEW'S relationship with his children or his ability to care for them thereafter.

And it is clear that despite the reason for the warrant (Absconding), that MATTHEW had not gone anywhere and JENNOFER knew this. MATTHEW continued to live at the same address, had the same phone and worked the same job until he was injured. This was not a case where anything that happened warranted JENNIFER'S reaction. There is absolutely no reason to bring this matter back to the court's attention based on the totality of the circumstances.

Finally, within the last week or so both MATTHEW and his wife, DEBBIE, have been questioned by Child Protective Services (CPS) with regard to circumstances surrounding the boys' custody

1 with their mother, JENNIFER, including, but not limited to,  
2 physical punishment? While MATTHEW is grateful for JENNIFER's  
3 primary role in the children's lives, he is unaware as to the  
4 status of the CPS investigation or to why it originated. This is an  
5 issue that Plaintiff is hoping the Court can shed some light on at  
6 trial.  
7

8 Chevy's Medical Condition

9 With regard to Chevy's medical condition, while MATTHEW  
10 acknowledges the seriousness of his condition, he has never been  
11 told that this is a "severe health risk" situation. While the  
12 surgery he had was considered major, the restrictions on Chevy  
13 following the procedure are not overwhelming. Even JENNIFER sought  
14 to allow Chevy to continue wrestling and still involves him in  
15 similar activities.  
16

17 MATTHEW has reached out to the hospital for a copy of Chevy's  
18 full surgery records (information that was denied him until now)  
19 and has contacted Chevy's current doctor to better understand this  
20 matter. He is obtaining information with regard to the extent of  
21 Chevy's medical condition and of his limitations and shall  
22 continue to ensure the child's well being each and every visit.  
23

24 As mentioned above, MATTHEW'S one concern at JENNIFER'S home  
25 is the extent that Chevy is involved in physical activity such as  
26 wrestling. There was even an order from the January 16, 2014  
27 hearing requiring MATTHEW to pick up his boys after **their**  
28 "wrestling clinics". Further, MATTHEW is also concerned with the

level of physical contact or punishment in JENNIFER'S household based on what he is led to believe happens there. This might have something to do with the current CPS investigation, but MATTHEW cannot be certain at this time.

JENNIFER however continues to allege that MATTHEW does not take Chevy's condition seriously, but can only raise one minor incident that she mistaknely turns into a life time of medical neglect. More than likely the incident was actually nothing more than car sickness and she was made aware of it almost instantly.

When it occured on the road coming back from their fishing trip, MATTHEW immediately had Weston call his mother while he attended to Chevy. The child did not show any signs of a headache (the key complication to look for) and was fine within the hour.

MATTHEW only recently was told of the need to maintain a log book of any such incidents and he is doing so. In addition, he immediately contacts JENNIFER upon any sich occurence so she to can keep a contemporaneous log.

Again, none of these facst rise to a level requiring a modification of MATTHEW'S visitation and he resepectfully requests that he be allowed to keep moving forward in this relationship. Nothing that has been presented to this court in any way shows that these children are in any danger while with their father or that he is not fit and proper to continue his current timeshare.

. . . .

III.

CHILD SUPPORT, ARREARS and MEDICAL INSURANCE

In September 2013 this Court ordered that MATTHEW was to pay JENNIFER \$1,246.00 per month as and for child support based on his earlier reported earnings. Since that time MATTHEW has suffered an injury and, despite JENNIFER'S allegations to the contrary, he was placed on Workman's Compensation. The DA'S Office continued to collect child support with regard to the current order until MATTHEW'S benefits ran out recently (through April 2014).

Accordingly, MATTHEW rightfully reported this change in circumstance to the District Attorney's Office and **THEY** placed the matter on calendar to address it. Not an attorney himself and unrepresented at the time, MATTHEW thought the matter would be placed on your Honor's calendar based on your previous order. However, the hearing was scheduled for August 26, 2014 in the UIFSEA Court, at which time the matter was referred back to Family Court, Department "T".

MATTHEW now has no monthly income through no fault of his own and is not willfully disregarding this court's order. While his income status is subject to change down the road based on his recovery and may even result in back pay that could qualify as income for the purpose of back child support, he simply does not have the funds each month to continue to pay JENNIFER \$1,246.00. He is currently surviving by utilizing the small savings he possessed,

his wife's current savings, selling whatever assets possible and through the kindness of others.

Pursuant to Nevada law MATTHEW's child support obligation should be temporarily modified and reduced to \$100.00 per child per month for a total of \$200.00 each month in accordance with NRS 125B.070 and NRS 125B.080. Such modified support should continue until MATTHEW is reinstated and eligible for employment through the Iron Workers Union.

Finally, with regard to the new arrears, MATTHEW admits that he was unable to pay child support for May, June, August, September and now October 2014. He requests that your Honor modify his child support retroactively to the filing of his request with the District Attorney's Office. Again, he did as they requested from him and could not have known that their attorneys would not address it in front of the proper authority.

Accordingly, arrears should be set at \$200.00 for those months and \$1,246.00 for any other months unaffected by this modification. This new amount can be added to his current arrears and paid back through the DA'S Office as he is currently doing. However, MATTHEW also requests that he receive an offset for either 100% or at least 50% of the medical insurance premiums he pays, and has paid, for the boys since JENNIFER was ordered to maintain their insurance, but failed to do so.

. . . .

. . . .

IV.

CONTEMPT

As the Court is well aware, Nevada law supports that before any finding of contempt can be made there must be a clear and concise order without ambiguity. Then there must be a willful and knowing violation by the accused party. Certainly this is not the case.

First, the provisions that JENNIFER refers to address "vacations" and not "removing the children from the State" just for the purpose of participating in out-of-state family activities. Although there is no language requiring an itinerary for same (and not even requiring a written itinerary for vacations), MATTHEW still provided JENNIFER with the necessary information before leaving on his fishing trip with the boys.

Additionally, the copy of the Parenting Plan provided by JENNIFER is unsigned by this Court and not filed. Further, there is no reference in their 2011 Decree of Divorce to this Plan ever being adopted, incorporated or merged into that court order.

Finally, only a Minute Order is provided for the alleged September 2013 order which also appears irrelevant as it clearly applies only to the orders of that particular day. JENNIFER cannot piece together a clear and concise string of orders even if your Honor was to consider that a single Father's Day fishing trip, which notice was provided for, constituted non-compliance with one or more of these possibly conflicting provisions.



The same is true with regard to any alleged violation of the legal custody provisions as they pertain to medical issues. JENNIFER does not make any specific allegation that can be defended. She simply makes a blanket accusation that "Matthew has failed to communicate any happenings"? That in and of itself cannot be the basis of an Order to Show Cause. This is especially true if the Parenting Plan was not signed and filed as an order.

Regardless, the legal custody provisions therein do not require MATTHEW to specifically "communicate every happening" as is alleged. The only applicable provision simply states that "The parents agree to notify the other parent as soon as reasonably possible of any **illness requiring medical attention** or any **emergency involving the children**".

Assuming 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 Weston called his mother to report the situation from the road. On the other hand, 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 a direct violation of the legal custody provisions.

MATTHEW actually 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. There has to be a little

1 consideration here when comparing the behavior of these two (2)  
2 parties.  
3

4 And concerning the last of the alleged violations by MATTHEW,  
5 JENNIFER appears to be making the assumption that if MATTHEW  
6 informs the DA'S Office of a change in circumstance pursuant to  
7 Nevada law (re: a 20% change in income) that he is somehow in  
8 violation of some order. Documents clearly show that the District  
9 Attorney's Office filed the motion to Modify, not MATTHEW.  
10 A proper motion has now been filed in front of your Honor and the  
11 matter is ripe to be heard.  
12

13 V.

14 SPOUSAL SUPPORT/ALIMONY

15 Spousal support/alimony is not an issue.  
16

17 VI.

18 PROPERTY AND DEBTS

- 19 A. Community Property and Debts: N/A  
20 B. Separate Property: N/A  
21 C. Legal and Factual Issues: N/A  
22

23 VII.

24 ATTORNEY'S FEES AND COSTS

25 Plaintiff is seeking an award of attorney's fees from the  
26 Defendant in this matter pursuant to Sergeant v. Sergeant, 88 Nev.  
27 223, 495 P.2d 618 (1972). First, that authority is irrelevant to  
28 the instant matter. Next, the Defendant has provided this court  
with inaccurate and irrelevant information and has failed to act

1 in good faith in trying to resolve this matter prior to extensive  
2 litigation. Additionally, Defendant has not incurred any  
3 attorney's fees to date to Plaintiff's knowledge.  
4

5 Finally, it is unclear exactly what JENNIFER is trying to  
6 accomplish by bringing these half-truths to the court's attention.  
7 As outlined above, MATTHEW was picked up on a warrant based on a  
8 misunderstanding and he was reinstated to his probation. JENNIFER  
9 should have waited to see what the outcome was going to be before  
10 she filed anything with this Court.

11 JENNIFER had the children in her custody the day after  
12 MATTHEW'S arrest and he clearly was not going to be exercising  
13 visitation while in jail. Nothing that occurred changed MATTHEW'S  
14 relationship with his children or his ability to care for them  
15 thereafter.  
16

17 And it is clear that despite the reason for the warrant  
18 (Absconding), that MATTHEW had not gone anywhere and JENNOFER knew  
19 this. MATTHEW continued to live at the same address, had the same  
20 phone and worked the same job until he was injured. This was not a  
21 case where anything that happened warranted JENNIFER'S reaction.

22 Accordingly, MATTHEW requests that each party bare their own  
23 fees in this matter.  
24

25 . . . .  
26 . . . .  
27 . . . .  
28

VIII.

LIST OF WITNESSES

It is anticipated that in addition to the parties and any necessary rebuttal witnesses the following witnesses will be called at the time set for trial in this matter:

1. Matthew Geiger;
2. Jennifer Gordon;
3. Officer Michael LaPutt (Parole and Probation);
4. James Miley;
5. Jonathan Sorrels; and
6. Robert Pickens.

IX.

LIST OF PROPOSED EXHIBITS

1. Payment record from Nevada Child Support Enforcement for Jennifer Gordon from December 2013 through July 31, 2014.
2. Statement from CNA claims (Worker's Comp) for the period 4/19/14 through 4/21/14 showing Mr. Geiger's final TTD payment;
3. Check stubs from Schuff Steel Company dated January 12, 2104 and January 19, 2014;
4. Letter from Kemp & Kemp re: Representing Mr. Geiger in his Worker's Compensation Claim;
5. Notice of Resetting of Hearing in front of the Appeals Officer re: Mr. Geiger's Worker's Compensation Claim;
6. Documents verifying Mr. Geiger's Workers Compensation Claim, including a copy of his request for compensation, wage calculation form and letters from Gallagher Bassett Services, Inc.; and

7. Verification that the conditions of Mr. Geiger's probation are current.
8. Note from Officer LaPutt for Mr. Geiger to report to Parole and Probation;
9. Money Order receipts for payments made to Parole and Probation by Mr. Geiger; and
10. Texts between Jennifer and Mr. Geiger verifying that he kept her up to date with regard to Chevy's health and a copy of the log kept by Mr. Geiger regarding same.

X.

UNUSUAL LEGAL OR FACTUAL ISSUES

It is not anticipated that any unusual legal or factual issues will be raised for the court to determine at the time set for trial in this matter.

XI.

LENGTH OF TRIAL

It is anticipated that one-half (1/2) day will be necessary in order to complete this trial.

DATED this 3rd day of October 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

# **EXHIBIT “1”**



PAYMENT RECORD as of 2014-08-26

Payments Received between 2013-12-01 and 2014-08-26

SUMMARY for GEIGER, MATTHEW ROBERT

Case ID	GST Full Name	Total Monthly Amount Owed	Total Disbursed to Custodian	Total Retained by the State
905053200A	GORDON, JENNIFER E	\$1,346.00	\$8,240.79	\$0.00
		Sum: \$1,346.00	\$8,240.79	\$0.00

My 2014 income = 13,810.54 (gross)  
→ She got = 8,240.79 (net)  
(Jennifer)



# Nevada Child Support Enforcement

PAYMENT RECORD as of 08-26-2014

Payments Received between 12-01-2013 and 08-26-2014

Total Number of Cases Retrieved: 1

Payor:

GEIGER, MATTHEW ROBERT

Case ID:

905053200A

Custodial Parent:

GORDON, JENNIFER E

Case Status:

ACTIVE

Docket Number: D10-430639

Statement prepared by:

BRAVOJO

Cur Order Eff Date: 09-06-2013

Payment Total for

Requested Time frame:

\$8,240.79

## CURRENT MONTH OBLIGATION

Provision Type	Current Support	Arrears	Total Monthly Amount
Child Support	\$1,246.00	\$100.00	\$1,346.00

## PAYMENTS RECEIVED BETWEEN 12-01-2013 AND 08-26-2014

#	Distribution Date	Distribution Source	Distribution Amount	Order Eff Date	Applied to Provision	Disbursed To
1	07-31-2014	NP	\$1,300.00	09-06-2013	Child Support	CUSTODIAN
2	04-28-2014	SI	\$133.11	09-06-2013	Child Support	CUSTODIAN
3	04-21-2014	SI	\$621.17	09-06-2013	Child Support	CUSTODIAN
4	04-07-2014	SI	\$621.17	09-06-2013	Child Support	CUSTODIAN
5	03-24-2014	UI	\$178.00	09-06-2013	Child Support	CUSTODIAN
6	03-21-2014	SI	\$621.17	09-06-2013	Child Support	CUSTODIAN
7	03-17-2014	UI	\$178.00	09-06-2013	Child Support	CUSTODIAN
8	03-10-2014	SI	\$621.17	09-06-2013	Child Support	CUSTODIAN
9	03-10-2014	UI	\$178.00	09-06-2013	Child Support	CUSTODIAN
10	03-03-2014	UI	\$178.00	09-06-2013	Child Support	CUSTODIAN
11	02-24-2014	UI	\$178.00	09-06-2013	Child Support	CUSTODIAN
12	02-21-2014	SI	\$621.17	09-06-2013	Child Support	CUSTODIAN
13	02-18-2014	UI	\$178.00	09-06-2013	Child Support	CUSTODIAN
14	02-11-2014	UI	\$356.00	09-06-2013	Child Support	CUSTODIAN
15	01-27-2014	IW	\$336.50	09-06-2013	Child Support	CUSTODIAN
16	01-21-2014	IW	\$336.50	09-06-2013	Child Support	CUSTODIAN
17	01-13-2014	IW	\$336.50	09-06-2013	Child Support	CUSTODIAN
18	01-06-2014	IW	\$336.50	09-06-2013	Child Support	CUSTODIAN
19	12-09-2013	IW	\$621.22	09-06-2013	Child Support	CUSTODIAN
20	12-02-2013	IW	\$310.61	09-06-2013	Child Support	CUSTODIAN
Grand Total:			\$8,240.79			



**State of Nevada**  
**State Collection and Disbursement Unit (SCaDU)**

**Receipt of Payment**

Received Date/Time : Jul 28, 2014 2:07:34 PM

Pay Source : NCP

Received By : aprescot

Pay Type : Cash

Receipt Number : 201470020897

Check/Debit Auth # : CASH

Received From (Payor) : GEIGER MATTHEW

#	Case Name	NCP SSN	NCP UPI	Office Code	Docket/Case #	Amount
1	GEIGER MATTHEW	530191426	905053200	02		1300.00
					<b>Total Payment Amount (\$):</b>	<b>1300.00</b>

**Notes :**

1. Paid by Debbie.

JUL 28 2014

SCaDU

# **EXHIBIT “2”**

0000020E300297690102950987000000000311

CNA ATTN CLAIM  
PO BOX 8317  
CHICAGO IL 60680

**CNA**

WC 10,891.78  
3,792.84  
1,496.80  
2

000311

MATTHEW R GEIGER



8659 HORIZON WIND AVE  
LAS VEGAS NV 89178-8733

* To expedite handling of your claim, please include our claim number on all future correspondence to us.							Claim Number *	
Insured/Client SCHUFF STEEL COMPANY							E3 2976906G	
Claimant GEIGER, MATTHEW R							ATT	
Date of Loss 01/17/14	Total WC Ind to Date \$10,891.78	From - thru Dates 04/19/14-04/21/14	Suff/DT IND	TRAN Code# 21	EXP	Pay Code# TT	Amount \$214.50	
Year to Date / work comp.							\$214.50	
Reason FINAL TTD BENEFIT - 3 DAYS								

To ensure timely delivery of your check, please verify that the address on this check is complete and correct. If not, please notify your claims representative with the correct information. Thank you.

ACCIWF 02.26.13

PLEASE DETACH BEFORE CASHING

# **EXHIBIT “3”**



CO.	DIV.	EMPLOYEE		TRADE	PERIOD END DATE	DEPT./LAST JOB	CHECK NO.
		MATTHEW R GEIGER			01-19-2014		17224
EARNINGS				DEDUCTIONS/BENEFITS			
DESCRIPTION	HOURS	RATE	AMOUNT	DESCRIPTION	AMOUNT	Y.T.D. AMOUNT	
REGULAR	40	\$37.42	\$1496.80	VACATION	\$156.80		
				CHILD SUPPORT	\$336.50		
				LEVY FEE	\$3.00		
CURRENT	\$1496.80	\$148.42	\$114.50			NET PAY	
Y.T.D.							
	GROSS EARNINGS	FEDERAL WITH. TAX	F.I.C.A.	STATE TAXES	LOCAL TAXES	TOTAL TAXES/DED.	\$737.58

# **EXHIBIT “4”**

KEMP & KEMP  
ATTORNEYS AT LAW  
7435 W. AZURE DRIVE, #110  
LAS VEGAS, NEVADA 89130  
TEL. (702) 258-1183 ♦ FAX (702) 258-6983

J.P. KEMP, ESQ.  
HEATHER E. KEMP, ESQ.  
VICTORIA L. NEAL, ESQ.

VIA FACSIMILE TO: (702) 851-5409 AND U.S. MAIL

August 18, 2014

William Smith, M.D.  
Western Regional Center for Brain & Spine Surgery  
3150 N. Tenaya Way, Suite 340  
Las Vegas, NV 89109

RE: Matthew Geiger / DOB: 09-14-79  
Appointment on August 21, 2014 at 12:30 pm / New Patient  
Workers' Compensation Claim Number: E3297690

Dr. Smith:

I represent Matthew Geiger for the above-referenced Workers Compensation Claim.  
Mr. Geiger was released from care by Dr. Bevins Chue on April 21, 2014 at Maximum Medical  
Improvement, and without a PPD rating.

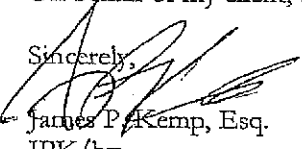
Objective consideration of the MRI done on March 18, 2014, noting an "Annular tear with central  
disc protrusion at the L5-S-1 level", and Mr. Geiger's persistent back pain, which has affected his  
ability to bend or stretch and made it difficult for him to sleep, does not seem to have been  
addressed by Dr. Chue.

I have instructed Mr. Geiger to bring the MRI films with him to his appointment so you can review  
them. I have enclosed a copy of the written MRI report, along with copies of Dr. Chue's treatment  
notes. Please take into consideration Dr. Chue's reporting dated March 27, 2014.

I would appreciate it if you would please address in your report whether or not, in your  
opinion, Mr. Geiger's claim should be closed at this time without a Permanent Partial  
Disability, and/or what other treatment options or testing would be appropriate for Mr.  
Geiger.

On behalf of my client, thank you in advance for your professional attention to this matter.

Sincerely,

  
James P. Kemp, Esq.

JPK/bv

Encs.

Cc: Matthew Geiger



# **EXHIBIT “5”**

FILED  
AUG 21 2014  
APPEALS OFFICE

BEFORE THE APPEALS OFFICER

In the Matter of the Contested  
Industrial Insurance Claim of:

MATTHEW GEIGER,

Claimant.

Claim No: E3297690

Appeal No: 1501182-GK

NOTICE OF RESETTING

TO ALL PARTIES IN-INTEREST:

PLEASE TAKE NOTICE that the above-captioned matter will now be heard in front of  
the Appeals Officer for a HEARING on:

DATE: October 14, 2014

TIME: 10:00 AM

PLACE: DEPARTMENT OF ADMINISTRATION  
2200 SOUTH RANCHO DRIVE #220  
LAS VEGAS, NV 89102

PLEASE TAKE FURTHER NOTICE that previously scheduled hearing dates in this  
matter, if any, are hereby vacated and reset to the above referenced date and time.

###

CONTINUANCE OF THIS SCHEDULED HEARING DATE SHALL ONLY BE  
CONSIDERED ON WRITTEN APPLICATION SUPPORTED BY AFFIDAVITS.

###

IT IS SO ORDERED this 14th day of AUGUST, 2014.

  
GREGORY A. KROHN, ESQ.  
APPEALS OFFICER

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583

# EXHIBIT “6”

**INJURED EMPLOYEE'S REQUEST FOR COMPENSATION**  
(Pursuant to NRS 616C.475(6))

ANSWER ALL QUESTIONS, DATE, SIGN AND RETURN TO YOUR CLAIMS AGENT

1. Name: Matthew Geiger Social Security # 530-19-1426 Phone No: (702) 449-3506
2. Physical address: 8659 Horizon wind ave #102 Las Vegas NV 89178  
Street City State Zip  
 Mailing address: // // // //  
Street/P.O.Box City State Zip  
 Is this a change of address? ☐ Yes ☒ No
3. Employer at time of injury: Schoff steel
4. Supervisor's name: Dan
5. Name of your attending physician or chiropractor: Dr. Bevins chue
6. Date on which you were last examined by attending physician or chiropractor: 3-27-14
7. Date of next appointment with physician or chiropractor: 4-7-14
8. a. Have you been released to return to work by your attending physician or chiropractor? ☐ Yes ☒ No  
 b. If so, give the date of release: N/A
9. a. Have you returned to work with another employer? ☐ Yes ☒ No  
 b. Are you receiving payment from any employer? ☐ Yes ☒ No  
 c. Date on which you returned to work: N/A  
 d. Name of employer for whom you returned to work: N/A  
 e. Address: N/A
10. Have you been disabled and unable to work in any occupation for at least 5 consecutive days, or 5 cumulative days within a 20 day period? ☒ Yes ☐ No
11. Date on which you last worked: 1-17-14 For Whom: Schoff steel
12. When do you expect to be able to return to your regular occupation? unknown
13. Would you be able to work at a light duty type job now? ☒ Yes ☒ No ?  
 Comment: My profession dose not have any light duty position
14. Has your employer offered you a light duty type job? ☐ Yes ☒ No  
 a. If yes, when was the light duty job offered? \_\_\_\_\_

Per NRS 616D.300, I understand that the reporting of false information may disqualify me from receiving workers' compensation benefits. Further, I understand falsification may subject me to civil and criminal penalties. I certify the above information is correct to the best of my knowledge.

4-1-14  
Date

[Signature]  
 Signature  
Las Vegas Clark NV  
 CITY COUNTY STATE

NOTE: An explanation of the methods used to calculate your average monthly wage and compensation benefits should accompany your first compensation check. If you did not receive this, please contact your claims agent.

FOR CLAIMS AGENT'S USE ONLY

PAY: From 4/5/14 To 4/10/14 Rev. date \_\_\_\_\_  
 From 4/01/14 To \_\_\_\_\_ TT Final TT TP

Date \_\_\_\_\_  
[Signature]  
 Signature

# WAGE CALCULATION FORM FOR CLAIMS AGENT'S USE

RE: Injured Employee Matthew Geiger Date of Injury 1/17/2014  
 Social Security 530-19-1426 Claim Number E3297690  
 Employer Schuff International Insurer \_\_\_\_\_  
 Third Party Administrator: Gallagher Bassett Services, Inc.

Average Monthly Wage is defined in NAC 616C.420 through 616C.447

The priorities for determining wage history are:

1. A 12 week history of earnings (84 days)
2. If a 12 week period of earnings is not representative of the injured employee's average monthly wage, a period of one year or the full period of employment, if it less than one year, may be used. A period of one year or the full period of employment must be used if the average monthly wage would be increased. Divide by the number of days in the period.
3. If period of employment is more than four weeks, but less than twelve weeks, earnings from the date of hire will be used. Divide by the number of days in the period.
4. If period of employment is less than four weeks, average monthly wage will be calculated by multiplying rate of pay on the date of the accident or disease, by hours in employee's projected working schedule, divide by 7 and multiply by 30.44.

If other circumstances apply, see NAC 616C.435.

**AVERAGE MONTHLY WAGE -** Calculate AMW in the following manner:

Period of Earnings: Beginning Date: 12/6/2013 through End Date: 1/16/2014  
 Gross Earnings: 8,427.84 + tips \_\_\_\_\_ divided by number of days  
 in wage history: 42 x 30.44 ..... = Average Monthly Wage: \$6,108.18  
**State Max:** \$5,290.70

**HOURLY RATE:** Hourly rate of pay: \_\_\_\_\_ x number of hours  
**projected** to work per week : \_\_\_\_\_ ÷ 7 x 30.44 .... = Average Monthly Wage: \$0.00  
**State Max:** \$5,290.70

**VALUE OF ROOM AND/OR BOARD:**

Room (monthly value) \_\_\_\_\_  
 Board (monthly value) \_\_\_\_\_

**VALUE OF MEALS :** If meals are provided by the employer, see NAC 616C.423(1)(p) and us the following formula:

Amount for meals per day \_\_\_\_\_ x number of days hired to work  
 per week \_\_\_\_\_ = \$0.00 ÷ 7 x 30.44 = Meals per Month: \$0.00

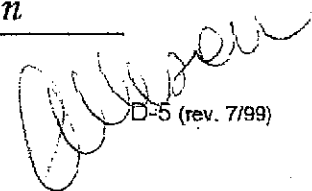
**ADD** applicable lines to obtain total ..... = Average Monthly Wage: \$6,108.18

**DAILY RATE :** is to be calculated in the following manner:

Average Monthly Wage: \$6,108.18 x 8 ÷ 12 ÷ 30.44 ..... = Daily Rate: \$133.78  
**Wkly Rate:** \$811.09 **State Max:** \$115.87  
**Bi-Weekly:** \$1,622.18

Date: 2/3/2014

Signature: Michelle Ferguson



D-5 (rev. 7/99)



Gallagher Bassett Services, Inc.

January 30, 2014

Matthew Geiger  
8659 Horizon Wind Ave #102  
Las Vegas, NV 89178

Re:	Employer:	Schuf Steel Company
	Insurer:	American Casualty Company
	Claim No:	E3297690
	Accident Date:	01-17-14
	Body Part(s):	Lumbar strain

Dear Matthew Geiger :

Gallagher Bassett Services, Inc. is in receipt of your claim for the above-mentioned date of injury. Based on the information submitted to this office, your claim has been **ACCEPTED** for your above listed body part(s). Liability is strictly limited to the listed body part(s).

**YOU MUST NOTIFY THIS OFFICE IMMEDIATELY IF YOU HAVE BEEN CERTIFIED AS UNABLE TO RETURN TO YOUR FULL DUTY POSITION, OR BEEN GIVEN A RESTRICTION BY YOUR TREATING PHYSICIAN THAT PREVENTS YOU FROM RETURNING TO YOUR FULL DUTY POSITON.**

In the event that you had a drug and or alcohol test performed as a result of this injury that has been reported as positive, the acceptance of your claim may be reversed upon receipt of the notification of the results of the test.

It is the objective of this company to ensure that you receive all benefits to which you may be entitled promptly, including medical treatment. All medical treatment must be pre-authorized by this office or designated nurse case manager, and must be within the insurer's (employer's) contracted preferred provider network. You may not seek medical treatment outside the contracted preferred provider network.

We wish you a speedy recovery. If we can be of any assistance, please contact our office at (866) 889-4755. If you disagree with this determination, you may file the enclosed "Request for Hearing" form with the Department of Administration, Hearing Officer at the address listed on the form, within seventy (70) days from the date of this determination. Failure to file a timely request with the Department of Administration, Hearing Officer may result in an order dismissing your case.

Sincerely,

Gallagher Bassett Services, Inc.

Michelle Ferguson  
Claims Adjuster

cc: Schuf Steel Company  
Concentra Medical Center  
File

Enclosure(s): Brief Description of your Rights; Request for Hearing



**Gallagher Bassett Services, Inc.**

March 17, 2014

Matthew Geiger  
8659 Horizon Wind Avenue  
Las Vegas, NV 89178-8733

Claim#: E3297690  
Employee: Matthew Geiger  
Employer: Schuff International Inc.  
Date Injured: 01/17/2014  
Underwriting Co.: American Casualty Company

Dear Matthew Geiger:

**TRANSFER NOTIFICATION**

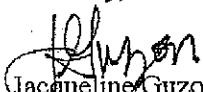
Gallagher Bassett Services, Inc. (GB) is the claim administrator who will be handling your claim. This letter will serve as acknowledgement of your claim and receipt of the same. **Please note that the above-mentioned claim has been transferred to me for further handling.**

If you continue to seek medical treatment for this injury, please make sure that going forward your medical provider sends all medical bills associated with this claim to:

Gallagher Bassett Services, Inc.  
P.O. Box 70030  
Las Vegas, NV. 89170-0030

Should you have any questions regarding your claim, please contact me at 702-789-4500 ext. 4325.

Sincerely,

  
Jacqueline Guzon  
Sr. Claims Adjuster  
Gallagher Bassett Services, Inc.  
Direct: (702) 789-4325  
Toll Free: (866) 889-4755  
Email: Jacqueline\_Guzon@gbtpa.com

CC: Schuff International Inc., Dr. Bevins Chue, File

Gallagher Bassett Services, Inc. | P.O. Box 70030 | Las Vegas, NV. 89170 | Toll Free: (866) 889-4755 | Fax: (866) 823-4130





Gallagher Bassett Services, Inc.

## NOTICE OF INTENTION TO CLOSE CLAIM

May 6, 2014

Matthew Geiger  
8659 Horizon Wind Avenue  
Las Vegas, NV 89178-8733

RE:	Insurer Claim No:	E3297690
	Employer:	Schuff International Inc.
	Accident:	01/17/2014
	Body Part:	B Lumbar
	Closure Date:	70 DAYS FROM THE DATE OF THIS NOTICE

Dear Matthew Geiger:

A review of your file reflects that you are no longer undergoing medical treatment or you have been considered medically stable by your treating physician as a result of your injury sustained on 01/17/2014 to the above listed body part(s). Therefore, please be advised that in accordance with NRS 616C.235(1), your claim will close in seventy (70) days from the date of this notice. A copy of NRS 616C.235 is enclosed for your review. Please read the attached notices carefully. If your claim was under \$300 during the first twelve- (12) months after your claim was accepted, you do not have a right to reopen your claim.

If you are still undergoing medical treatment or feel that further medical treatment is necessary, please contact this office within seventy (70) days.

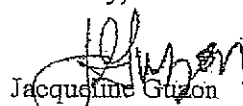
We have not received notification from your treating physician advising that you have a ratable impairment, therefore; in pursuant to NRS 616C.235(5,b), you will not be scheduled for a rating evaluation.

You may reopen your claim in accordance with NRS 616C.390, a copy of which is attached for your records. If you only received medical benefits as a result of your claim, you must apply for reopening within one (1) year from the date of closure.

If you should have any questions, please do not hesitate to contact this office at the number listed above.

Should you disagree with this determination, you may file the enclosed "Request for Hearing" form with the Department of Administration, Hearing Division within seventy (70) days from the date of this letter.

Sincerely,

  
Jacqueline Guzon  
Sr. Claims Adjuster

cc: Schuff International Inc., Dr. Bevins Chue, File

Enclosures (NRS 616C.235; Injured Employee's Rights to Reopen a Claim Which Has Been Closed; NRS 616C.390; Request for Hearing form)

Gallagher Bassett Services, Inc.

P.O. Box 70030 | Las Vegas, NV. 89170-0030

Direct: (702) 789-4325 | Toll Free: (866) 889-4755 | Fax: (866) 823-4130



Gallagher Bassett Services, Inc.

April 28, 2014

Matthew Geiger  
8659 Horizon Wind Avenue  
Las Vegas, NV 89178-8733

RE: Employee: Matthew Geiger  
Employer: Schuff International Inc.  
Date Injured: 01/17/2014  
Claim#: E3297690  
Underwriting Co.: American Casualty Company

Dear Matthew Geiger:

This notice is in response to your request for a second opinion dated April 22, 2014.

As you are aware, you were last seen for medical treatment by Dr. Bevins Chue on April 21, 2014 where you have been discharged from care as being at maximum medical improvement in relation to the industrial injury dated January 17, 2014.

Dr. Bevins Chue has indicates that you have been receiving medications from another physician for pre-existing chronic conditions, he has recommended that you follow-up with your prescribing physician for further treatment of your chronic non-industrial conditions as there are no medical objective findings to substantiate or warrant additional medical treatment for your industrial injury of January 17, 2014. Your request for a second opinion is hereby denied.

**If you disagree with this determination, you may file the enclosed "Request for Hearing" form with the Department of Administration, Hearing Officer at the address listed on the form, within seventy (70) days from the date of this determination. Failure to file a timely request with the Department of Administration, Hearing Officer may result in an order dismissing your case.**

# **EXHIBIT “7”**

## Subject Payment Receipt

Number: 802372540111002400099  
Receipt Date: September 04, 2014  
In the Amount of: \$30.00

**Matthew Geiger**  
8659 Horizon Wind Ave #102  
Las Vegas, NV 89178

Subject ID Number: 1002400099  
Tax ID Number: \*\*\*\*\*1426  
Money Order Type: MONYORDR  
Money Order Number: 17-066890978  
Field Receipt #: (Optional)  
Received in Office: 401  
Reference Officer: LaPutt

**Subject remaining balances as of this payment are as follows:** (To be reviewed with Officer)

Supervision Fee Balance:	0.00
Restitution Balance:	0.00
House Arrest Balance:	0.00
Drug Test Balance:	0.00
DNA Balance:	0.00
Psych Test Balance:	0.00
Extradition Balance:	0.00
Parolee Loan Balance:	0.00
Bad Debt Balance*:	0.00
Last Account Update:	September 04, 2014

\* Bad Debt is an account that has not received a payment within 30 days of discharge, and every 30 days thereafter. The Bad Debt balance is before payment allocation.

**Payment Allocated as follows:**

Suprv Fees 30.00

# **EXHIBIT “8”**

MR GEIGER

PLEASE

REPORT TO

PAROLE & PROBATION

AND CALL

OFFICER LAPUN

406-3648

# EXHIBIT “9”

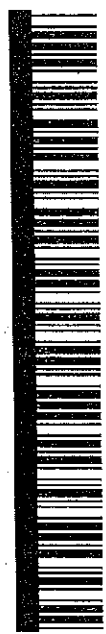
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Probation S/F for January 2011

AGT 170976 LOC 013702 DT 010311 \$30.00 30DOLLARS AND NO CENT

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PURCHASE AGREEMENT: You the purchaser agree that Western Union Financial Services Inc. (WUFSI) need not stop payment on, or replace, or refund a lost or stolen WUFSI Money Order unless: (1) you fill in the face of the Money Order at the time of purchase, and (2) you report the loss or theft to Western Union Financial Services Inc. in writing immediately, and (3) you provide WUFSI with this original Money Order receipt issued by Western Union Financial Services Inc., Englewood, Colorado. For customer service, call 1-800-959-5600.



\* 14201177817 \*

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\* 14259225404 \*

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Court Feb 2011

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EMPLOYEE

R203181160677

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# EXHIBIT “10”

Group MMS

9/20/14 6:20 PM

Just letting you know Chevy has a headache. We gave him some motrin.

Ok. Is he tired or not drinking water?... Please keep me posted or have him call me thx

Chevy And Wes

I think he's tired. I am sure he will be just fine. I will keep you posted.

9/20/14 6:29 PM

Ok I just need to write everything down. Did he take his allergy medicine last night?

Chevy And Wes

And how much Motrin did he take? I usually give him one pill which is 200mg but if that doesn't help within

And how much Motrin did he take? I usually give him one pill which is 200mg but if that doesn't help within an hour then I give him one 325mg Tylenol (not the extra strength)

Chevy And Wes

Lots of water and dark quiet room. Sometimes he likes hot or cold rags on his forehead and neck

Chevy And Wes

We've got it covered.

9/20/14 6:42 PM

Can u give me any details leading up to his headache? I need to log it

Chevy And Wes

We were watching TV and he was playing on my tablet

Group MMS

an hour then I give him one 325mg  
Tylenol (not the extra strength)

Chevy And Wes

Lots of water and dark quiet room.  
Sometimes he likes hot or cold rags  
on his forehead and neck

Chevy And Wes

We've got it covered.

9/20/14 5:42 PM

Can u give me any details leading up  
to his headache ? I need to log it

Chevy And Wes

We were watching TV and he was  
playing on my tablet

Ok

Chevy And Wes

9/24/14 5:27 PM

## Chevy's Medical log

Dad's visitation

August 29<sup>th</sup> @ 6:00pm thru August 31<sup>st</sup> @ 6:00pm

(No Medical Issues)

September 12<sup>th</sup> thru September 14<sup>th</sup>

(Out of town due to Debbie's surgery)

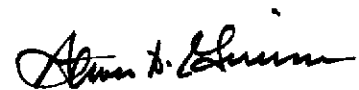
September 19<sup>th</sup> @ 6:00pm thru September 21<sup>st</sup> @ 6:00pm

Chevy had a headache on Sep 20<sup>th</sup> at about 6:00pm. We gave him the recommended dose of children's motrin and contacted Jennifer to inform her. Chevy's headache ended approx. an hour later with no further issues.

September 26<sup>th</sup> @ 6:00pm thru September 28<sup>th</sup> @ 6:00pm

(No Medical Issues)

**ORIGINAL**



CLERK OF THE COURT

**NOTC**

GARY M. ZERNICH, ESQ.  
Nevada Bar No. 7963  
KRISTOFER J. SNOW, ESQ.  
Nevada Bar No. 13253  
ZERNICH LAW OFFICE  
600 Whitney Ranch Drive, Ste. A-5A  
Henderson, Nevada 89014  
(702) 616-9838  
"Unbundled" Attorneys for Defendant

**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 "UNBUNDLED" APPEARANCE OF COUNSEL FOR DEFENDANT**

TO: Peter Bellon, ESQ., attorney for Plaintiff

YOU WILL PLEASE TAKE NOTICE of "unbundled" appearance of counsel on behalf of Defendant, JENNIFER ELISE GORDON, in the above-referenced matter. Counsel will appear in an unbundled capacity for the evidentiary hearing scheduled for October 9, 2014 at 1:30 p.m.

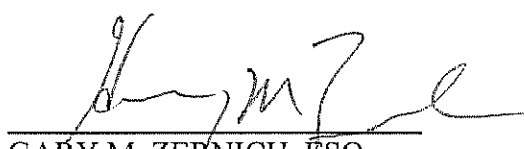
///

///

1 Any and all documents regarding Defendant must be served on GARY M.  
2 ZERNICH, ESQ. of the ZERNICH LAW OFFICE, 600 Whitney Ranch Drive, Unit A-5A,  
3 Henderson, NV 89014.

4 10/3/14

ZERNICH LAW OFFICE


5  
6   
7 GARY M. ZERNICH, ESQ.  
8 Nevada Bar No.: 7963  
9 KRISTOFER J. SNOW, ESQ.  
10 Nevada Bar No. 13253  
11 600 Whitney Ranch Dr., Unit A-5A  
12 Henderson, NV 89014  
13 (702) 616-9838  
14 Attorneys for Defendant

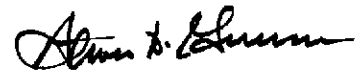
15 **CERTIFICATE OF MAILING**

16 Pursuant to Nevada Rule of Civil Procedure 5(b), I certify service of the foregoing **NOTICE**  
17 **OF APPEARANCE OF COUNSEL FOR DEFENDANT** was made this 3<sup>rd</sup> day of  
18 October, 2014, by depositing a true copy, first class mail, in a sealed envelope, postage prepaid at  
19 Henderson, Nevada addressed as follows:

20 Peter Bellon, Esq.  
21 732 South Sixth Street Suite 102  
22 Las Vegas, NV 89101

23 Jennifer Gordon  
24 (Via Email Only)

25   
26 Kelly Perri, an employee of  
27 ZERNICH LAW OFFICE  
28



CLERK OF THE COURT

ROC  
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

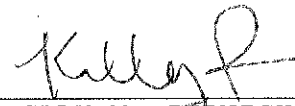
RECEIPT OF COPY

RECEIPT OF COPY of the following documents:

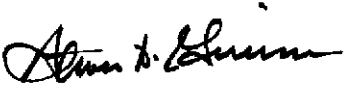
1. Plaintiff's List of Witnesses and Exhibits;
2. Plaintiff's Exhibits; and
3. Plaintiff's Pre-Trial Memorandum.

is herein acknowledged on the 3<sup>rd</sup> day of October, 2014.

ZERNICH LAW OFFICE

By:  Bar No. 13220  
GARY M. ZERNICH, ESQ.  
Nevada State Bar #004528  
600 Whitney Ranch Drive, Suite A-4A  
Henderson, Nevada 89014  
Attorney for Defendant (unbundled)





CLERK OF THE COURT

DISTRICT COURT  
CLARK COUNTY, NEVADA  
\*\*\*\*

MATTHEW ROBERT GEIGER,  
PLAINTIFF

CASE NO: D-10-430639-D

VS.

DEPARTMENT T

JENNIFER ELISE GORDON,  
DEFENDANT.

ABC'S OF PARENTING

Submitted by:



Name: Matthew R. Geiger

Address: 81259 Horizon wind ave. #102

City/State/Zip: Las Vegas, NV 89113

Telephone: (702) 443-0101

*Clark County Department of Family Services  
Parenting Project*

# *Certificate*

*This certifies that*

**Matthew Geiger**

*has successfully completed*

**ABC's of Parenting**

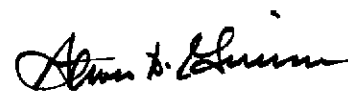
*December 9, 2014*

Client Id: 37770  
15.0 Hours

Clark County Department of Family Services  
Quality Assurance - Training  
121 S Martin Luther King Blvd  
Las Vegas, Nevada 89106  
(702) 455-5295

*Shirley Beck*  
Training Coordinator

DISTRICT COURT  
CLARK COUNTY, NEVADA

  
CLERK OF THE COURT

MATTHEW ROBERT GEIGER,

Plaintiff,

vs.

JENNIFER ELISE GORDON

Defendant.

CASE NO.

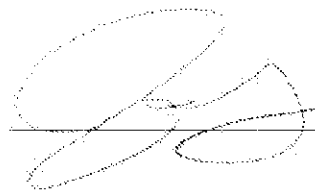
D-10-430639-D

DEPT. NO.

T

ABC'S OF PARENTING FOR JENNIFER AND BARON

Submitted by:



Name:

Jennifer E. Gordon

Address:

71 Autumn Day Street

City/State/Zip:

Henderson, NV 89012

Telephone:

(702) 284 7073

Clark County Department of Family Services  
Parenting Project

# Certificate

*This certifies that*

**Jennifer Gordon**

*has successfully completed*

**ABCs of Parenting**

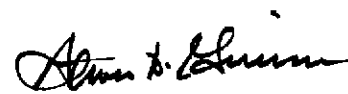
*December 9, 2014*

*Signature*  
Training Coordinator

Client Id: 85727  
15.0 Hours

Clark County Department of Family Services  
Quality Assurance - Training  
121 S Martin Luther King Blvd  
Las Vegas, Nevada 89106  
(702) 455-5295

DISTRICT COURT  
CLARK COUNTY, NEVADA

  
CLERK OF THE COURT

MATTHEW ROBERT GEIGER,

Plaintiff,

vs.

JENNIFER ELISE GORDON

Defendant.

CASE NO.

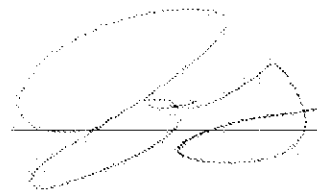
D-10-430639-D

DEPT. NO.

T

ABC'S OF PARENTING FOR JENNIFER AND BARON

Submitted by:



Name:

Jennifer E. Gordon

Address:

71 Autumn Day Street

City/State/Zip:

Henderson, NV 89012

Telephone:

(702) 284 7073

Clark County Department of Family Services  
Parenting Project

# Certificate

*This certifies that*

**Baron Lizares**

*has successfully completed*

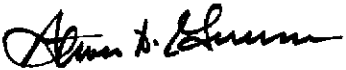
**ABCs of Parenting**

*December 9, 2014*

Client Id: 85843  
15.0 Hours

Clark County Department of Family Services  
Quality Assurance - Training  
121 S Martin Luther King Blvd  
Las Vegas, Nevada 89106  
(702) 456-5295

  
Training Coordinator

  
CLERK OF THE COURT

ORIGINAL

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:

TIME:

NOTICE OF MOTION

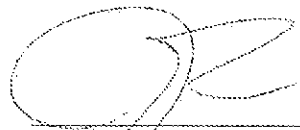
TO: PETER BELLON ESQ

TO: MATTHEW GEIGER

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that:

The undersigned will bring the above and foregoing Motion on for hearing before the Court on the 24 day of MARCH 2015, ~~2014~~, at the hour of 09:00 o'clock A m. of said day, in Department 7.

DATED this 23 day of February, 2015.



JENNIFER GORDON  
91 Autumn Day Street  
Henderson, Nevada 89012  
(702) 234-9673  
Defendant in Proper Person

1 **MOTION FOR RECONSIDERATION, NEW TRIAL, AND AMENDMENT OF**  
2 **JUDGMENT PURSUANT TO RULE 59; AND RELIEF FROM JUDGMENTS**  
3 **PURSUANT TO RULE 60B<sup>1</sup>**

4 COMES NOW, Defendant, JENNIFER GORDON, appearing in proper person, and  
5 hereby request that the Court reconsider her **Motion to Modify Child Custody, Visitation,**  
6 **and/or Child Support and Orders To Show Cause for Plaintiffs Violations of 11-01-2010**  
7 **Order, 03-08-2011 Order and 09-16-2013 Minute Order,** and/or to grant a new trial  
8 (Evidentiary Hearing).  
9

10 To summarize the reasons for Jennifer's request, the summary facts are as follows:

- 11 - The Court significantly modified Jennifer's custodial rights regarding her two  
12 minor children, ages 13 and 10, without regard to Jennifer's due process  
13 to a full and fair hearing and without the matter being before the Court.  
14  
15 - The hearing on October 9, 2014 was set for multiple different purposes, those  
16 being an evidentiary hearing regarding Jennifer's request to hold the Plaintiff in  
17 contempt for violating her joint legal custody rights on multiple different  
18 occasions, because the Plaintiff was not fully paying his court ordered child  
19 support, because the Plaintiff was violating court orders setting certain  
20 restrictions on him regarding traveling with the children, and other lesser issues;  
21  
22 - The evidentiary portion of the October 9<sup>th</sup> hearing was also to take testimony  
23 from a probation officer so the court could make an informed ruling regarding  
24

25  
26 

---

<sup>1</sup> Pursuant to EDCR Rule 5.28, Gary Zernich, Esq., NV Bar number 7963, was hired in a limited scope  
27 capacity to assist the Defendant with the drafting of this Motion. Mr. Zernich was not hired to provide  
28 any legal service beyond some of the drafting.



1 the Plaintiff's accusation made in his countermotion that Jennifer lied to the  
2 probation department and had him arrested on false information;

- 3 - The October 9, 2014 hearing also included aspects that had nothing to do with  
4 the evidentiary hearing part of the hearing. The date was also set to determine  
5 whether to take evidence at a future hearing regarding Jennifer's request to  
6 modify custody. For that part of her motion the court ordered and conducted a  
7 child interview with both children. And, since the Plaintiff did not file his  
8 opposition to Jennifer's motion until the day before the initial motion hearing,  
9 the court also was going to consider on October 9<sup>th</sup> Jennifer's Reply. Thus, the  
10 October 9<sup>th</sup> hearing was also what is commonly thought of as the "return from  
11 child interview" hearing;  
12

- 13  
14 - The main basis for Jennifer's instant motion is that the court significantly  
15 modified HER custodial rights with certain restrictions regarding HER custodial  
16 rights, but that issue was never put before the court in a motion (request) by the  
17 Plaintiff. A ruling was made by the court sua sponte, but without any notice or  
18 due process to Jennifer;  
19

- 20 - The court made rulings primarily based upon the interview with the children and  
21 CPS records, neither or which was shared with Jennifer until the morning of  
22 October 9, 2014, leaving Jennifer in an unprepared position to present proper  
23 evidence either through her own testimony or to call witnesses to refute what the  
24 court interpreted as damning evidence. All of which, Jennifer argues, was  
25 misinterpreted and most of which was untrue;  
26  
27  
28

1       -     The court ordered an interview with the children at the prior hearing and the then  
2       sitting Judge, The Honorable Gayle Nathan, interviewed the children herself.  
3       But, the court did not share the interview with the parties until the morning of  
4       October 9<sup>th</sup>, even though asked by Jennifer prior to that date. Receiving the  
5       interview summary the day of the hearing might be an acceptable procedure if  
6       the interview was only being used as a basis to set an evidentiary hearing, but it  
7       is not acceptable if being used as a basis to modify custody. The procedure in  
8       that regard does not give the litigant a due process right to adequately prepare for  
9       the hearing. If evidence was brought to light for the first time by a party against  
10      the other on the same day as the hearing it would commonly be objected to as  
11      "surprise". Rule 16.2 calls for sharing information prior to an evidentiary  
12      hearing. The court in essence did itself what Jennifer would have otherwise  
13      objected too should the Plaintiff have done the same thing, and if the Plaintiff  
14      did the same thing and Jennifer objected then her objection should have been  
15      granted.

16      -     The issue about the late presentation of the child interview is basically the same  
17      issue as the court's consideration of the CPS records. The Court obtained CPS  
18      records and did not make them available for review until the morning of October  
19      9<sup>th</sup>. The records were lengthy and confusing and intertwined much information  
20      about a CPS case that involved Jennifer's live-in boyfriend and father to her  
21      youngest child. The Court did not call any CPS investigator as a witness and  
22      Jennifer claims that the records were entirely misunderstood by the Court as it  
23      was found by the CPS investigator that all of the accusations made against  
24

1 Jennifer's boyfriend were ruled to be unsubstantiated. The accusations about  
2 Jennifer's boyfriend were made by her boyfriend's ex and by coercion of his  
3 younger children, whom he has primary physical custody. Either way, the point  
4 made for this motion is that Jennifer's did not have any due process rights to  
5 prepare her response to the records. She would have given testimony and called  
6 witnesses, including the CPS case worker and investigator, whom she had been  
7 in contact with both before, and after, the hearing.  
8

9  
10  
11 **RULE 16.205. MANDATORY PREJUDGMENT**  
12 **DISCOVERY REQUIREMENTS IN PATERNITY OR**  
13 **CUSTODY MATTERS**

14 (a) **Exemptions.** Upon a finding of good cause, a court may  
15 exempt all or any portion of a case from the application of this rule,  
16 in whole or in part.

17 (b) **Required Disclosures.**

18 (8) **Evidentiary Hearing Exhibits.** A copy of each document or  
19 other exhibit, including summaries of other evidence, that a party  
20 expects to offer as evidence at the evidentiary hearing in any  
21 manner shall be disclosed to the other party. Unless otherwise  
22 directed by the court, these disclosures must be made at least 21  
23 days before the evidentiary hearing. At least 5 judicial days before  
24 the evidentiary hearing, unless a different time is specified by the  
25 court, a party may serve any objection, together with the grounds  
26 therefor, with respect to the admissibility of materials. Objections  
27 not so asserted, other than objections under NRS 48.025 and  
28 48.035, shall be deemed waived unless excused by the court for  
good cause shown.

At the initial hearing for Jennifer's motions, on August 28, 2014 an evidentiary hearing  
was set to rule on certain aspects of Jennifer's motions and to hear from the Plaintiff's probation  
officer with regards to Plaintiff's Opposition and Countermotion. And, since the Plaintiff only

1 gave Jennifer his Opposition and Countermotion the day before the initial hearing, to wit:  
2 August 27, 2014, the Court said Jennifer could file a Reply and it would be considered at the  
3 October 3<sup>rd</sup> hearing. Even though Jennifer did not have time to file her Reply by August 28<sup>th</sup>,  
4 Jennifer did however show up to the hearing with all requested documents regarding Chevy's  
5 medical history (Chevy has a brain deformity) and gave a full copy to Plaintiff's attorney. The  
6 Court acknowledged Jennifer's concern with Chevy's health and made orders to Plaintiff  
7 regarding such. The Court also ordered Plaintiff to provide the Court, and Jennifer, with his  
8 medical records with regards to his disability, and his drug test results for the test(s) taken while  
9 on probation. Plaintiff also requested, once again, an interview with the children. A date was  
10 set for October 3, 2014 at 9 a.m., such date being used by the Court for many purposes. One, to  
11 hear Jennifer's motions and to take testimony from the probation officer regarding Plaintiff's  
12 allegations that Jennifer intentionally had him arrested by lying to the probation department.  
13 That part of the hearing date was an evidentiary hearing. It was also meant to be used to  
14 consider the children's interview, and that part of the hearing date was essentially a motion  
15 hearing, or return from child interview, but not specifically scheduled as a part of the  
16 evidentiary hearing. It was Jennifer's understanding that the result of the children's interview  
17 would either form a basis, or not, to come back for an additional evidentiary hearing if  
18 necessary.  
19  
20  
21  
22

23 Note: The Plaintiff did not file, and had not filed by October 3, 2014, which was the  
24 date of the limited Evidentiary Hearing and a continuation date of Jennifer's motion, a motion  
25 to modify custody or to place a restriction on Jennifer to safeguard the children from being  
26 around her boyfriend unsupervised. The issue of whether or not her boyfriend could be around  
27  
28

1 the children without other supervision was not properly before the Court on the date of the  
2 Evidentiary Hearing and one that Jennifer had not even prepared for.

3       Leading up to the October 3<sup>rd</sup> date, on September 03, 2014 the children were  
4 interviewed by the Court, after spending the prior 3 days with the Plaintiff and that having been  
5 the first time he saw them since his incarceration, and after being pulled from their classes and  
6 interrogated by CPS. On September 12, 2014 Jennifer filed her **Reply to Opposition and**  
7 **Counter-motion** then on September 18, 2014 filed her **Pre-trial Memorandum and Witness**  
8 **List and Production of Documents**. On September 25<sup>th</sup> the return date was rescheduled to  
9 October 9. The Plaintiff filed his **Pre-trial Memorandum** on October 3, 2014 long after the  
10 required cut-off date, and in it contained none of the evidence he claimed he had in his  
11 opposition and counter-motion, nor any drug test exhibits or medical records, regarding his  
12 disability, as ordered by the Court that he provide. On October 9, 2014 the evidentiary hearing  
13 consisted of nothing more than testimony from the probation officer, and limited testimony  
14 from Jennifer. Jennifer had named witnesses, and they showed up to court on October 9<sup>th</sup>, to  
15 give testimony regarding the allegations contained in both Jennifer's motion and Reply and the  
16 Plaintiff's Opposition and Counter-motion. Jennifer was going to call her witnesses to support  
17 her motion, but was not even aware that she would need to call them for the purpose of a  
18 potentially having a ruling made that was going to take certain custodial rights away from her,  
19 as the request was not even before the Court. Nonetheless, none of Jennifer's witnesses were  
20 ever even allowed the chance to testify, and sadly they could have helped shed a lot of light on  
21 the new issue that so shockingly to over the trial in its entirety.

22       Not only was none of the evidence regarding Jennifer's motions heard on October 9<sup>th</sup>,  
23 but the exact opposite occurred, court procedure that denied Jennifer her due process rights to  
24

1 adequately prepare for and present her side of the case at the evidentiary hearing. When it  
2 became evident that the Court was moving into territory that was not thought to be a part of the  
3 evidentiary hearing, Jennifer's attorney requested and continuance, a couple times, to  
4 adequately prepare for the Court's sudden and unexpected sua sponte decision to consider a  
5 change of custody in favor of the Plaintiff. Specifically, leading up to the October 9<sup>th</sup> date the  
6 Court refused to share the child interview and gave no indication that it had obtained, and  
7 reviewed CPS records, keeping in mind that the CPS records were not yet introduced into  
8 evidence and were not made available to Jennifer until the day of the hearing.  
9

10  
11 At one point in the hearing Jennifer's attorney specifically pointed out that there was a  
12 significant difference between what the Plaintiff filed in his opposition as compared to what he  
13 filed as a part of his Pretrial Memorandum. And, an evidentiary hearing that was supposed to  
14 be about why the Plaintiff should or shouldn't be held in contempt of repeatedly lying to  
15 Jennifer about relevant custody issues, about continued and repeated miscommunication and  
16 false communications from Plaintiff to Jennifer, and repeated and continued refusal to obey  
17 previous court orders, actually turned out to be about the child interview and CPS records. The  
18 evidentiary hearing was supposed to be the time for Jennifer to have to opportunity to prove her  
19 allegation that the Plaintiff continued to disobey court orders and the law, many things that  
20 ultimately were having a detrimental effect on the children. Jennifer alleged that she had an  
21 overwhelming amount of evidence to prove her allegations, but the Court did not allow her to  
22 present it. However, the Court did say several times that there had been numerous issues with  
23 Plaintiff's credibility. But, instead of making a finding in that regard, the Court told Jennifer  
24 that it didn't believe her about her attempts to voice her opinion about the child's statements  
25  
26  
27  
28

1 allegedly made during an interview with the Judge, even without giving Jennifer an opportunity  
2 to testify about the issue or to call her witness.

3       Seemingly the Court formed a biased opinion, one not based in evidence that was  
4 admitted, and its own interpretation of the CPS records. At 4pm, still not having past  
5 discussions and arguments about Plaintiffs incarceration and arrest, the Court stated "It's 4  
6 o'clock, we need to finish everything up today"...The Court releases Jennifer from the stand  
7 and Jennifer's attorney speaks up with "I thought you said we could proceed?" At which time  
8 the Court goes directly into child support.  
9

10       Plaintiff again argues and makes excuses about the motions filed at the DA's office, but  
11 without any documents to back it up. Jennifer's documents and testimony would have quickly  
12 cleared, the perjury up on that issue. Why? Because Jennifer was the one that had to go to the  
13 DA's office to stop the hearing they had scheduled to hear his motion to modify child support.  
14 Jennifer was the one that gave the DA's office the Orders that stated only Dept. T could change  
15 anything.  
16

17       When Plaintiff was asked about not having his medical records to prove his claimed  
18 disability, and as Ordered by the Court that he produce for the evidentiary hearin, both him and  
19 the attorney made a slew of excuses, and by the end said they weren't aware that they needed  
20 anything more than what they had filed, which was Plaintiffs disability rejection letters. Not a  
21 shred of medical documentation. Jennifer's attorney argued again. He then asked the Court to  
22 enforce the orders that have already been made. He pointed out that Plaintiff had already been  
23 held in contempt and sentenced, so this would be a second contempt just on one specific issue.  
24 He then asked that the sentence be enforced. The Court disagrees and heard more testimony  
25 from Plaintiff about his disability and how he had been selling items to pay child support so his  
26  
27  
28

1 license won't get revoked. Again, no receipts of these claimed expensive items and vehicles he  
2 claims he had to let go of because of Jennifer. The Court ruled in Plaintiffs favor.

3 Then the Court ruled that based on the probation officers testimony, there was no  
4 evidence that "Matt" was on notice a warrant was issued or that he was not complying with his  
5 probation. Jennifer's attorney again argued how it doesn't make any sense what conclusion the  
6 Court was finding. Jennifer had clearly produced Plaintiff's probation sentencing from the very  
7 first date he started his probation. Where was any documentation, in writing, showing that  
8 Plaintiff was under 'new' conditions. Jennifer's attorney also reminded the Court, the ONLY  
9 reason the probation officer was even called to testify in the first place was because of Plaintiffs  
10 Opposition that claimed Jennifer was lying. That was made very clear, that the Plaintiff's  
11 claim that Jennifer was lying was untrue.

14 Jennifer's attorney tries to bring up Chevys medical history but is being rushed by  
15 Plaintiffs attorney, and by the Court, so he states "if we had more time", then asks "if we can  
16 come back another day because he has lots of things to present to the Court." He tries to  
17 explain different situations that put Chevys health in jeopardy at the hands of the Plaintiff. He  
18 pleads that "we have not been able to present evidence." He asks again for a 2<sup>nd</sup> day to present  
19 evidence, but everything kept going back to the probation officer. Plaintiff's attorney  
20 throughout the entire trial keeps pushing, what he says, "the more serious issue", that should be  
21 addressed. He talks frequently, reminding the Court about horrible abuse going on, as if the  
22 CPS records are accurate and substantiated instead of the other way around. The Court hears a  
23 small example of the issues, regarding the motion for sole legal custody, but they were  
24 examples Jennifer's attorney was trying to give so the Court would allow testimony, evidence,  
25  
26  
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1 and witnesses or at the very least understand that we needed to come back to properly hear  
2 everything.

3 The Court made a few orders, tightening the reigns on Plaintiff and his unwillingness to  
4 communicate with Jennifer. The Court also made an order that Plaintiff could not take the  
5 children out of town again without giving notice or she would order he could never take them  
6 out of town again. However, the Court had already made two orders previously that Plaintiff  
7 has disregarded, and this was one of Jennifer's motions for contempt.

8  
9 The Court then came to the newly produced CPS reports, and although Jennifer refuted  
10 what the Court was reading. The Court said they did not believe her. Jennifer pleaded that the  
11 reports were generated from another ex-spouse in Indiana, the Court again said "I don't believe  
12 this came from Indiana". The Court noted that CPS had said that "ALL the children had been  
13 coached", however the Court would not hear that it was not Matsy (Jennifer's boyfriend) or  
14 Jennifer that CPS was talking about. The Court told Jennifer "not to argue because this was a  
15 losing battle on her part." Jennifer again tried telling the Court there was several investigations  
16 going on and the person whom had filed these reports was being brought up on criminal  
17 charges, but the Court said "don't tell me there is an investigation going on here and there",  
18 then she said "I've been thinking about it since September 3rd and what was I supposed to do  
19 about it." Jennifer pleaded one last time but the Courts mind was made up. The Court stated "  
20 the only thing I am "lasered" on is your boyfriend and your two boys".  
21  
22  
23

24 If that alone isn't grounds for a new trial then I don't know what is. The trial had clearly  
25 become about nothing more than the Courts opinion of newly presented CPS records and her  
26 interview with the children.  
27

## 28 CASE LAW ANALYSIS

1 The Nevada Supreme Court stated in Moser v. Moser, 108 Nev. 572, 576-77, 836 P.2d  
2 63, 66 (1992) the following: Litigants in a custody battle have the right to a full and fair  
3 hearing concerning the ultimate disposition of a child. Mathews v. District Court, 91 Nev. 96,  
4 97, 531 P.2d 852, 852 (1975). At a minimum, observance of this right requires that before a  
5 parent loses custody of a child, the elements that serve as a precondition to a change of custody  
6 award must be supported by factual evidence. Furthermore, the party threatened with the loss of  
7 parental rights must be given the opportunity to disprove the evidence presented.  
8

9  
10 *IN THE INSTANT CASE*, the Court decision was not supported by factual evidence.  
11 The Court based it's ruling that Jennifer's boyfriend Baron was not allowed around Jennifer's  
12 children unsupervised on CPS records that were never admitted into evidence. Further, the CPS  
13 records, nor the Court's summary of the child interview, were produced to Jennifer until after  
14 the parties were called into the Court for the start of the hearing, thus Jennifer was not provided  
15 her right to a full and fair hearing.  
16

17 Further, in the matter of Dagher v. Dagher, 103 Nev. 26, 731 P.2d 1329 (1987) the  
18 Nevada Supreme Court overturned the District Court's ruling with the following reason: The  
19 motion for an order to show cause did not seek a permanent change of physical custody. Thus,  
20 it appears that Rita Dagher (Rita) was never apprised that the hearing might involve a change of  
21 custody. This issue was further explored again in Wiese v. Granata, 110 Nev. 1410, 887 P.2d  
22 744 (1994) when the Nevada Supreme Court stated: We now vacate those portions of the  
23 district court's April 13, and 18, 1994 orders which affect the custody rights of the parties  
24 because (1) Wiese did not receive notice that the issue of child custody was before the district  
25 court; (2) Wiese did not receive a full and fair hearing; .... First, due process requires that  
26 notice be given before a party's substantial rights are affected. The notice of hearing Wiese  
27  
28

1 received does not mention or even hint that child custody is at issue. *Dagher v. Dagher*, 103  
2 Nev. 26, 731 P.2d 1329 (1987), is exactly on point. In that case, the district court gave custody  
3 of the parties' minor child to the father following a hearing on a motion [887 P.2d 746] for  
4 "modification of divorce" which the mother failed to attend. *Id.* at 27, 731 P.2d at 1329. The  
5 motion for modification of divorce did not seek a permanent change of physical custody. Thus,  
6 as with Wiese in this case, the mother was never apprised that the hearing might involve a  
7 change of custody. *Id.* at 27, 731 P.2d at 1329. This court reversed the district court's order  
8 changing custody, calling it "precipitous" and holding that "the court erred in changing custody  
9 without prior specific notice and as a sanction for perceived maternal misconduct." *Id.* at 28,  
10 731 P.2d at 1330 (footnote omitted).

13 *IN THE INSTANT CASE*, the issue of whether Jennifer's boyfriend, Baron, should or  
14 should not be allowed to be around her children unsupervised was not before the Court. This is  
15 a substantial right that Jennifer was previously allowed, particularly because Baron and Jennifer  
16 live together and have an infant child together. Thus Jennifer again was deprived of her due  
17 process rights to properly prepare her testimony and case for this issue.

#### 20 MOTION FOR RECONSIDERATION

22 Rule 2.24. Rehearing of motions.

23 (a) No motions once heard and disposed of may be renewed in the same cause, nor  
24 may the same matters therein embraced be reheard, unless by leave of the court  
25 granted upon motion therefor, after notice of such motion to the adverse parties.

26 (b) A party seeking reconsideration of a ruling of the court, other than any order which  
27 may be addressed by motion pursuant to N.R.C.P. 50(b), 52(b), 59 or 60, must file a  
28 motion for such relief within 10 days after service of written notice of the order or  
judgment unless the time is shortened or enlarged by order. A motion for rehearing or  
reconsideration must be served, noticed, filed and heard as is any other motion. A  
motion for reconsideration does not toll the 30-day period for filing a notice of appeal  
from a final order or judgment.

1 (c) If a motion for rehearing is granted, the court may make a final disposition of the  
2 cause without reargument or may reset it for reargument or resubmission or may make  
3 such other orders as are deemed appropriate under the circumstances of the particular  
4 case.

5 **RULE 59. NEW TRIALS; AMENDMENT OF JUDGMENTS.**

6 (a) Grounds. A new trial may be granted to all or any of the parties and on all or  
7 part of the issues for any of the following causes or grounds materially affecting the  
8 substantial rights of an aggrieved party: (1) Irregularity in the proceedings of the court,  
9 jury, master, or adverse party, or any order of the court, or master, or abuse of  
10 discretion by which either party was prevented from having a fair trial (with  
11 emphasis); (2) Misconduct of the jury or prevailing party; (3) Accident or surprise  
12 which ordinary prudence could not have guarded against; (4) Newly discovered  
13 evidence material for the party making the motion which the party could not, with  
14 reasonable diligence, have discovered and produced at the trial; (5) Manifest disregard  
15 by the jury of the instructions of the court; (6) Excessive damages appearing to have  
16 been given under the influence of passion or prejudice; or, (7) Error in law occurring at  
17 the trial and objected to by the party making the motion. On a motion for a new trial in  
18 an action tried without a jury, the court may open the judgment if one has been  
19 entered, take additional testimony, amend findings of fact and conclusions of law or  
20 make new findings and conclusions, and direct the entry of a new judgment.

21 (b) Time for Motion. A motion for a new trial shall be filed no later than 10 days after  
22 service of written notice of the entry of the judgment.

23 (c) Time for Serving Affidavits. When a motion for new trial is based upon affidavits  
24 they shall be filed with the motion. The opposing party has 10 days after service within  
25 which to file opposing affidavits, which period may be extended for an additional  
26 period not exceeding 20 days either by the court for good cause shown or by the  
27 parties by written stipulation. The court may permit reply affidavits.

28 (d) On Court's Initiative; Notice; Specifying Grounds. No later than 10 days after  
entry of judgment the court, on its own, may order a new trial for any reason that  
would justify granting one on a party's motion. After giving the parties notice and an  
opportunity to be heard, the court may grant a timely motion for a new trial for a  
reason not stated in the motion. When granting a new trial on its own initiative or for a  
reason not stated in a motion, the court shall specify the grounds in its order.

(e) Motion to Alter or Amend a Judgment. A motion to alter or amend the judgment  
shall be filed no later than 10 days after service of written notice of entry of the  
judgment.

*IN THIS INSTANT CASE*, this Court should grant Jennifer a rehearing or reconsider it's  
ruling because of the many irregularities during the evidentiary hearing and motion hearing that

1 prevented Jennifer from getting a fair trial on October 9, 2014 and prior to reconsidering, recall  
2 the evidentiary hearing and allow Jennifer to properly present evidence regarding both the child  
3 interview and the CPS records. Jennifer's request are timely made as the Order from the  
4 October 9, 2014 hearing has never been submitted, thus this request is made within 10 days for  
5 the Notice of Entry of Order. The deadline under Rule 2.24 and Rule 59 is obviously an outside  
6 deadline with no restrictions of filing too early. The deadline  
7

8 A motion for reconsideration and new trial should be granted on the grounds that there  
9 were irregular proceedings of the Court, a clear abuse of discretion preventing Jennifer from a  
10 fair trial, and the surprise of the CPS records that were not presented till the day of court, which  
11 were unsubstantiated for huge reasons, and clearly misread, which Jennifer could not have  
12 prepared for by any normal means. Part of Jennifer's motion was the issue of Plaintiffs  
13 psychological evaluation which was based almost completely on lies, with written and well  
14 documented evidence to prove such, but has not ever even been given any true consideration,  
15 even though it has been brought up by Jennifer on multiple occasions.  
16 The original custody order was changed and Plaintiff's visitation time was extended without a  
17 hearing to discuss the psychological evaluation and a trial to present evidence refuting such a  
18 change.  
19  
20

21 DATED this 23 day of February, 2015.  
22

23  
24  
25 JENNIFER GORDON  
26 91 Autumn Day Street  
27 Henderson, Nevada 89012  
28 (702) 234-9673  
Defendant in Proper Person

MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Matthew Geiger  
Plaintiff/Petitioner

-vs-

Jennifer Gordon  
Defendant/Respondent

CASE NO. D: 10 430639 D

DEPT. 7

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

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

MOTION FOR/OPPOSITION TO: Reconsideration, New Trial, and Amendment  
of Judgment pursuant to rule 59; and relief from judgments  
pursuant to rule 60 B

Motions and Oppositions  
to Motions filed after  
entry of final Decree or  
Judgment are subject to  
the Re-open filing fee of  
\$25.00, unless  
specifically excluded.  
(See NRS 19.0312)

Excluded Motions/Oppositions

- ☐ Motions filed before final Divorce/Custody Decree entered  
(Divorce/Custody Decree is NOT final)
- ☐ Child Support Modification ONLY
- ☒ Motion/Opposition for Reconsideration (Within 10 days of Decree)  
Date of Last Order Order never filed
- ☒ Request for New Trial (Within 10 days of Decree)  
Date of Last Order Order never filed
- ☐ Other Excluded Motion \_\_\_\_\_  
(Must be prepared to defend exclusion to Judge)

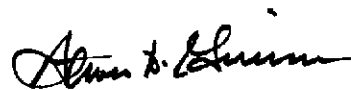
Note: If no boxes are checked, filing fee MUST be paid.

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

Date: February 23, 2015

Jennifer Gordon  
Printed Name of Preparer

  
Signature of Preparer



CLERK OF THE COURT

CERT

Name: Jennifer Gordon

Address: 91 Autumn Day Street

Henderson, NV 89012

Telephone: 7022349673

Email Address: \_\_\_\_\_

In Proper Person

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Matthew Geiger

Plaintiff,

vs.

Jennifer Gordon

Defendant.

CASE NO.: D-10-430639-D

DEPT: T

**CERTIFICATE OF MAILING**

I, (name of person who mailed the document) Jennifer Gordon, declare under penalty of perjury under the law of the State of Nevada that the following is true and correct. That on (month) February (day) 24, (year) 2015, service of the:

(☒ check all that apply)

☒ Motion

☐ Answer

☐ Financial Disclosure Form

☐ Opposition

☐ Reply

☐ Notice of Entry of Judgment / Order / Decree

☐ Other: \_\_\_\_\_

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

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

Peter Bellon, Esq.

732 South Sixth Street Suite 102

Las Vegas, NV 89101

DATED this 24 day of February, 2015

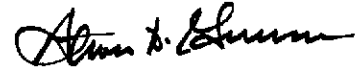
(Signature)





OPP  
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Attorney for Plaintiff

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CLERK OF THE COURT

DISTRICT COURT  
CLARK COUNTY, NEVADA

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

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

Date of Hearing: 3-24-2015  
Time of Hearing: 9:00 a.m.

**OPPOSITION TO DEFENDANT'S MOTION FOR RECONSIDERATION, NEW TRIAL  
AND AMENDMENT OF JUDGMENT PURSUANT TO RULE 59; AND RELIEF FROM  
JUDGMENTS PURSUANT TO RULE 60B(1) and COUNTERMOTION TO ENFORCE  
THE TERMS OF THE OCTOBER 9, 2014 ORDER, FOR ANOTHER CHILD  
INTERVIEW OR EVALUATION AND 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  
Reconsideration, New Trial and Amendment of Judgment Pursuant to  
Rule 59; and Relief from Judgments pursuant to Rule 60b(1) and  
Counter motion to Enforce the October 9, 2014 Order, For Another  
Child Interview or Evaluation and For Attorney's Fees and Related  
Relief.

1 This Opposition and Countermotion are made and based on the  
2 foregoing Points and Authorities, all the papers and pleadings on  
3 file with this Court and any oral argument adduced at the time of  
4 the hearing in this matter.

5 DATED this 13<sup>th</sup> day of March 2015

6 BELLON & MANINGO, LTD.

7  
8 By: 

9 PETER J. BELLON, ESQ.  
10 Nevada Bar No. 004528  
11 732 South Sixth Street, Suite 102  
12 Las Vegas, Nevada 89101  
13 admin@bellonandmaningo.com  
14 Phone: 702/452-6299  
15 Fax: 702/452-6298  
16 Attorney for Plaintiff

17 MEMORANDUM OF POINTS AND AUTHORITIES

18 I.

19 STATEMENT OF FACTS AND BACKGROUND

20 The parties hereto, Plaintiff, MATTHEW ROBERT GEIGER  
21 (hereinafter referred to as "MATTHEW"), and Defendant, JENNIFER  
22 ELISE GORDON (hereinafter referred to as "JENNIFER"), were  
23 divorced on or about September 27, 2011. Unfortunately, they have  
24 been before this court numerous times on JENNIFER'S motions since  
25 then.

26 There are two (2) minor children born the issue of said  
27 marriage, to-wit: WESTON C. GEIGER, born November 11, 2001 and  
28 CHEVY W. GEIGER, born August 11, 2004. Weston is currently  
thirteen (13) years old and Chevy is ten (10).

1 On October 9, 2014 the parties appeared before this Court for  
2 an Evidentiary Hearing on Defendant's Motion for an Order to Show  
3 Cause and for Orders to Modify Child Custody, Visitation and/or  
4 Child Support and Plaintiff's Countermotion to Modify Child  
5 Support, for Attorney's Fees and Related Relief.

6 These issues were all addressed at the time of the hearing  
7 and the Court also found that it had serious concerns with regard  
8 to the CPS Reports involving Defendant's home and the information  
9 obtained from the child interviews. Neither of these two (2)  
10 issues involved documents or evidence under the control of  
11 Plaintiff.

12 The Court's concerns included the minor children indictating  
13 that Defendant's current boyfriend was punching the minor child,  
14 WESTON, in the stomach and arms as a form of discipline and that  
15 CHEVY was forced to continue to participate in wrestling despite  
16 physical limitations which make it dangerous for him to do so.

17 The Court had previously addressed these issues in 2011 and  
18 was greatly concerned that they had continued despite the Court's  
19 orders to the contrary (re: JENNIFER'S ongoing contempt and  
20 inability to protect the children from her boyfriend). As a result  
21 of the Court's findings, it even seriously contemplated a change  
22 in primary physical custody in favor of MATTHEW. However, no such  
23 change was made thus making JENNIFER'S instant motion almost  
24 completely moot.

25 The Court ordered that custody would remain the same, however  
26 Plaintiff would be allotted some additional visitation with the  
27  
28

1 minor children while some protections would be put in place to  
2 safeguard the boys. The children were not be alone with  
3 Defendant's boyfriend, Matsy, and he was not to discipline them  
4 for any reason. Further, the prohibition on CHEVY wrestling was  
5 to stand.

6 Understandably, when the focus was finally turned on JENNIFER  
7 and the more serious problems in her home, she was not happy with  
8 this Court's decision. In the five (5) months preceding her  
9 decision to file this motion, JENNIFER just simply chose to ignore  
10 most of your Honor's orders. Her boyfriend continues to be alone  
11 with the minor children and continues to discipline them. CHEVY is  
12 also continuing to participate in wrestling despite his brain  
13 injury and this court's cease and desist order.

14 Now, while remaining in contempt this entire time, JENNIFER  
15 files this frivolous motion with proverbial "dirty hands" asking  
16 that the October 9, 2014 Order be reconsidered and/or that a new  
17 trial be set in this matter. This now only because MATTHEW has  
18 raised his concerns with JENNIFER'S continued violations and has  
19 been forced to report continued violence in her home to Child  
20 Protective Services yet again.

21  
22  
23 II.

24 OPPOSITION

25 Defendant's Motion for Reconsideration, New Trial and Amendment  
26 of Judgment Should be Denied in its' Entirety

27 Rule 2.24. Rehearing of motions.

28 (a) No motions once heard and disposed of may be  
renewed in the same cause, nor may the same matters

1           therein embraced be reheard, unless by leave of the  
2           court granted upon motion therefor, after notice of  
3           such motion to the adverse parties.

4           (b) A party seeking reconsideration of a ruling of the  
5           court, other than any order which may be addressed  
6           by motion pursuant to NRCP 50(b), 52(b), 59 or 60,  
7           must file a motion for such relief within 10 days  
8           after service of written notice of the order or  
9           judgment unless the time is shortened or enlarged  
10          by order. . A motion for rehearing or  
11          reconsideration must be served, noticed, filed and  
12          heard as is any other motion. A motion for  
13          reconsideration does not toll the 30 day period for  
14          filing a notice of appeal from a final order or  
15          judgment.

16          (c) If a motion for rehearing is granted, the court may  
17          make a final disposition of the cause without  
18          reargument or may reset it for reargument or  
19          resubmission or may make such other orders as are  
20          deemed appropriate under the circumstances of the  
21          particular case.

22               NRCP 60 (b) provides,

23               Mistakes; inadvertence; excusable neglect; fraud, etc.  
24               On motion and upon such terms as are just, the court may  
25               relieve a party or his legal representative from a final  
26               judgment, order, or proceeding for the following  
27               reasons: (1) mistake, inadvertence, surprise, or  
28               excusable neglect....

              Right from the very beginning of her motion JENNIFER displays  
her lack of understanding with regard to what happened on October  
9, 2014. This Court did NOT "significantly modify" her custodial  
rights in any way. Case law later cited by JENNIFER will continue  
to focus on circumstances and decisions that CHANGED physical  
custody, not ones that maintained it and issued orders protecting  
and safeguarding the health and well being of the minor children.  
The Court has the authority to do that at any point in any  
proceeding.

1           This Court took testimony and heard argument and made rulings  
2 in the best interest of the minor children and did so in  
3 accordance with Nevada law and the evidence. Just because these  
4 rulings were not favorable to JENNIFER and her boyfriend, does not  
5 mean that they were flawed. This is not a case about JENNIFER'S  
6 best interest despite her inability to see that. Just as she did  
7 in court (which went towards her credibility or lack thereof)  
8 JENNIFER again attempts to protect herself and her boyfriend at  
9 the cost of her sons' well being.

10  
11           This Court conducted an interview with the minor children by  
12 **stipulation** of the parties. The information derived at that time  
13 gave the Court concern and Judge Nathan reviewed the confidential  
14 CPS file, which was not available to EITHER party. The parties  
15 received this information at the same time and no objections were  
16 made on the record with regard to same.

17           Defendant's application of **N.R.C.P. 16.205** is flawed in that  
18 this rule applies only to the parties and not to the Court itself.  
19 In part it states that "A copy of each document or other exhibit,  
20 including summaries of other evidence, **that a party** expects to  
21 offer as evidence at an evidentiary hearing in any manner shall be  
22 disclosed to the other party". Rule 16.205 simply does not apply  
23 to the situation at hand.

24  
25           The Judge conducted an interview by stipulation of the  
26 parties and reviewed related supplemental documents as a result of  
27 her findings during that interview. This information is properly  
28 before the court and identical notice was given to both parties at

1 the same time. It should be noted that there were no objections on  
2 the record to moving forward at that time. Accordingly, Defendant  
3 failed to preserve her right to object post hoc.

4 More importantly, the correct statutory application in this  
5 case is **N.R.C.P. 15(b)**, which states:

6 **NRCP 15(b) Amendments to Conform to the Evidence.**

7  
8 When issues not raised by the pleadings are tried  
9 by express or implied consent of the parties, they shall  
10 be treated in all respects as if they had been raised in  
11 the pleadings. Such amendment of the pleadings as may  
12 be necessary to cause them to conform to the evidence  
13 and to raise these issues may be made upon motion of any  
14 party at any time, even after judgment; but failure so  
15 to amend does not affect the result of the trial of  
16 these issues. If evidence is objected to at the trial  
17 on the ground that it is not within the issues made by  
18 the pleadings, the court may allow the pleadings to be  
19 amended and shall do so freely when the presentation of  
20 the merits of the action will be subserved thereby and  
21 the objecting party fails to satisfy the court that the  
22 admission of such evidence would prejudice the party in  
23 maintaining the parties' action or defense upon the  
24 merits. The court may grant a continuance to enable the  
25 objecting party to meet such evidence.

26  
27 JENNIFER complains that MATTHEW did not file any pleading  
28 seeking the particular relief that was ordered with regard to the  
safeguarding and protecting the minor children. The reality of the  
situation is that none of this information came out until the  
interviews were conducted and Judge Nathan revealed her findings.  
At that point the proper orders were made consistent with the  
evidence and the best interest of the minor children. Not one of  
these orders significantly modified JENNIFER'S custody rights  
however.

1 And not only was the information gleaned by Judge Nathan  
2 during the interviews relevant and admissible, at least by implied  
3 stipulation of the parties, but no objection was made at the time  
4 of the hearing with regard to their use. The bottom line here is  
5 simply that the evidence was not favorable to JENNIFER and now she  
6 seeks to have a proverbial "do over" or second bite of the apple  
7 because she realizes that the circumstances in her home and the  
8 pressure from her boyfriend do not allow her to comply with the  
9 court's orders. This is even more scary and perhaps the reason to  
10 investigate and evaluate that environment further.

11 Likewise, the case law supplied by Defendant is flawed as  
12 well. The Moser and Mathews cases are not applicable by simple  
13 application of the language contained in JENNIFER'S pleading. This  
14 is NOT a "**custody battle**"; custody was never an issue in this  
15 matter. The language in the Mathews case continues "this right  
16 requires that **before a parent loses custody** of a child...".  
17 Clearly, all these cases discuss a modification of physical  
18 custody and not adjustments and safeguards to protect the children  
19 from physical and emotional harm.

20 The same is true of the Weise case which also dealt with a  
21 modification of primary physical custody, not with ancillary or  
22 protective safeguards. The Nevada Supreme Court noted that "due  
23 process requires notice be given before a party's **substantial**  
24 **rights** are affected" (emphasis added). The Court continued much  
25 along the lines of Moser and Mathews indicating that these  
26 decisions were based on significant changes or losses of parental  
27  
28



1 rights. Application of these findings to the case at hand are  
2 simply erroneous.

3 And despite Defendant's allegations, the concerns outlined in  
4 her motion were addressed, testimony taken and argument heard. The  
5 Court ruled, denying Plaintiff's contempt after hearing testimony  
6 of the Probation Officer. Child support arrears were addressed and  
7 reduced to judgment and travel outside of Nevada was curtailed.  
8 MATTHEW'S visitation was slightly increased because the Court felt  
9 that too was in the best interest of the boys. JENNIFER'S entire  
10 objection is to the Court entering orders necessary to protect the  
11 minor children from harm in her own home!

12 Just because the Court did not believe JENNIFER'S blanket  
13 denials and did not agree with her excuses or assessment of the  
14 situation, does not justify a rehearing with regard to these  
15 issues. Judge Natahn heard for herself the words of these children  
16 and they were consistent with what other professionals had been  
17 told. **The only one not willing to see the truth staring her right**  
18 **in the face was JENNIFER!**

19  
20 And the proof of this proverbial pudding can be seen in  
21 JENNIFER'S conduct since these orders were entered. JENNIFER has  
22 failed to comply with the protections put in place and continues  
23 to put these children at risk. CHEVY is still participating in  
24 wrestling despite the order of 2011 (which originally prohibited  
25 both boys from wrestling) and the subsequent orders and  
26 admonishments in October 2014. Her boyfriend continues to watch  
27 the minor children unsupervised and physically punishes them.  
28

WESTON, age 13, has been denied food because he is "too fat" and needs to "suck weight" for wrestling. He is also still be beaten by JENNIFER'S boyfriend and MATTHEW can no longer hide this fact in fear that JENNIFER will retaliate any further against the child. CHEVY, age 10, has been seen being dragged by the neck by the boyfriend at a wrestling practice/match that he should not even be participating in! The boys are forbidden to call their father when these things happen and thus the "safe word" put in place by the Court for this reason is useless.

It is clear that there should be another hearing, but not to reconsider and not to amend the orders of October 9, 2014. Instead, this court should order a pyschological evalution of JENNIFER and a full child custody evaluation. After the reports are finalized, MATTHEW will likely file his Motion to Change Custody and then JENNIFER can truly have something to worry about. We will be glad to extend her all the due process she wants at that time!

As for now however, Plaintiff is requesting that Defendant's Motion be denied in its' entirety. There is absolutely no legal basis to rehear any portion of this matter or to amend or reconsider any existing order. Accordingly, Plaintiff's frivolous motion should be denied and MATTHEW awarded attorney's fees for having to defend this action.

. . . .

. . . .

. . . .

III.

COUNTERMOTION

Plaintiff Requests that this Court Enforce  
its' Order issued on October 9, 2014 and Re-Interview the Minor  
Children, or in the Alternative, Orders a Psychological and  
Child Custody Evaluation

As indicated above, this Court issued an Order from the Hearing on October 9, 2014. Unfortunately, despite Counsel's attempt, he has been unable to get Defendant's Counsel to sign off on same. At this time Plaintiff would request that the Court enforce this Order despite the fact that it has not been executed by Defendant's Counsel.

JENNIFER was present in the courtroom when Judge Nathan entered these orders and her edicts could not have been misunderstood. JENNIFER supports this claim in her own pleading where she consistently outlines her arguments that day against the entry of these specific orders. Upon information and belief, as well as his own observations and discussions with the boys, Plaintiff has legitimate concerns for their continued well-being in JENNIFER'S home. Defendant continually disregards the Court's order and as a result continues to put them in harm's way.

As addressed previously the parties' minor child, CHEVY, suffers from a medical condition and has some limitations in place to ensure his well-being. One of these is that the minor child is not to participate in contact sports. Plaintiff believes that despite not one, but two court orders, Defendant is still insisting that CHEVY participate in wrestling (conditioning)

Monday through Thursday. CHEVY is no longer subjected to tournaments as he is now with Defendant during that time.

In fact, in October, Plaintiff was advised by Defendant that he would have to pick up BOTH children from wrestling practice at Foothill High School for his holiday visitation. MATTHEW indicated that CHEVY was not supposed to be wrestling so he would pick him up at the appointed time and then get WESTON once wrestling practice was complete.

Instead, when the parties arrived at the school, Plaintiff parked next to the Defendant's van to get CHEVY. However when the minor child exited the vehicle he was **grabbed by the back of the neck by JENNIFER'S boyfriend, Matsy**, and told to go into the gym. Once Plaintiff calmed down after seeing this, he entered the building to find his son, only to find him suited up, complete with head gear for wrestling practice.

When JENNIFER noticed MATTHEW she removed CHEVY's headgear and acted as if he was just observing, Plaintiff was then able to take the child and leave. MATTHEW has also been told by the boys that they are forced to practice wrestling while at Defendant's home as well and this is all very dangerous to CHEVY's brain condition.

Additionally, WESTON, is again being continually harrassed and degraded, mostly, but not completely, by Matsy. It has become so bad that Plaintiff fears that WESTON may be developing an eating disorder. One example happened recently when Plaintiff took the children out to eat and it is not an isolated incident any

1 the children out to eat and it is not an isolated incident any  
2 more.

3 WESTON, who had not eaten in some time, was looking very sad.  
4 When asked, he ordered only water. When questioned, WESTON  
5 commented that Defendant and her boyfriend have indicated that he  
6 is "**too fat**" and needs to lose 10 pounds to get to the wrestling  
7 weight **they** want him to fight at. This denial of food from fear of  
8 reprisal from JENNIFER and Matsy is a repeating event with WESTON  
9 at this time.

10  
11 Further, WESTON has also indicated that Defendant's boyfriend  
12 is again punching and hitting him and now Matsy's oldest son has  
13 struck him in the face as well, calling him fat and making fun of  
14 him. When Matsy intervenes to WESTON'S cries he calls the minor  
15 child "a f...ing pussy". WESTON has indicated that his mother has  
16 done nothing with regard to these incidents.

#### 17 IV.

#### 18 ATTORNEY'S FEES AND SANCTIONS

19  
20 Lastly, this Court has the authority to make an award of  
21 reasonable attorney's fees to MATTHEW pursuant to the following  
22 statutes:

23 N.R.S. 125B.140(5)(b) provides that:

24  
25 5. The court shall determine and include in its Order:

26 . . . .

27 (b) A reasonable attorney's fee for the proceeding,  
28 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.

**NRS 18.010** states:

Award of attorney's fees.

1. The compensation of an attorney and counselor for his services is governed by agreement, express or implied, which is not restrained by law.

2. In addition to the cases where an allowance is authorized by specific statute, the court may make an allowance of attorney's fees to a prevailing party:

(a) When he has not recovered more than \$20,000; or

(b) Without regard to the recovery sought, when the court finds that the claim, counterclaim, cross-claim or third-party complaint or defense of the opposing party was brought without

reasonable ground or to harass the prevailing party.

3. In awarding attorney's fees the court may pronounce its decision on the fees at the conclusion of the trial or special proceeding without written motion and with or without presentation of additional evidence.
4. No oral application or written motion for attorney's fees alters the effect of a final judgment entered in the action or the time permitted for an appeal therefrom.
5. Subsections 2, 3 and 4 do not apply to any action arising out of a written instrument or agreement which entitles the prevailing party to an award of reasonable attorney's fees.

JENNIFER continues to disregard this Court's Orders with regard to the minor children. Her continued failure to abide by this Court's orders borders on contempt (the new order has not been filed due to delay by her previous counsel). If nothing else, she continues to act in bad faith placing the minor children in danger. Ironically, it was MATTHEW that was contemplating the filing of a motion to address her total disregard of the Court's orders.

Additionally, JENNIFER'S entire motion is without merit and her application of the facts and the law to the situation in hand is completely erroneous. This is simply her attempt to get that proverbial second bite of the apple with a new Judge on the bench. If she was so concerned for her due process rights and the best interest of the children why did JENNIFER not file in October, November or December 2014? Why did she not let the same Judge who heard this matter and who had this knowledge at hand make the decision to reconsider her decisions or allow for another trial?

1 Accordingly, an award of attorney's fees in an amount no less  
2 than \$3,500.00 should be made to Plaintiff and Defendant should be  
3 sanctioned as deemed proper by this Honorable Court.

4 Conclusion

5 In light of the foregoing, Plaintiff, MATTHEW ROBERT  
6 GEIGER respectfully requests that the Court grant the following  
7 relief:

- 8 1. An Order denying Defendant's Motion in its' entirety;  
9 2. That the Court enforce its' previous Order from the  
10 October 9, 2014 hearing;  
11 3. That the Court interview the minor children and/or order  
12 a full Psychological and Child Custody Evaluation;  
13 4. For an award of attorney's fees in the amount no less  
14 than \$3,500.00; and  
15 5. For any other relief deemed appropriate by this Court.

16 Dated this 13<sup>th</sup> day of March 2015.

17 BELLON & MANINGO, LTD.

18 

19 PETER J. BELLON, ESQ.  
20 Nevada Bar No. 004528  
21 732 South Sixth Street, Suite 102  
22 Las Vegas, Nevada 89101  
23 admin@bellonandmaningo.com  
24 Phone: (702) 452-6299  
25 Fax: (702) 452-6298  
26 Attorney for Plaintiff  
27  
28



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 TO DEFENDANT'S MOTION FOR RECONSIDERATION, NEW TRIAL AND AMENDMENT OF JUDGMENT PURSUANT TO RULE 59; AND RELIEF FROM JUDGMENTS PRUSUANT TO RULE 60B(1) AND COUNTERMOTION TO ENFORCE THE TERMS OF THE OCTOBER 20, 2014 ORDER AND FOR ATTORNEY'S FEES AND RELATED RELIEF.

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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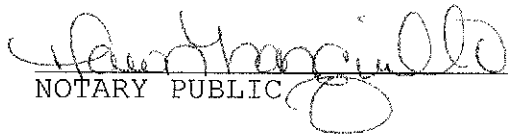
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specifically incorporate those statements, as if they were set forth in full herein.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
MATTHEW ROBERT GEIGER

SUBSCRIBED and SWORN to before  
me this 13th day of March 2015.

  
NOTARY PUBLIC



DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Matthew Robert Geiger  
Plaintiff/Petitioner

-vs-

Jennifer Elise Geiger  
Defendant/Respondent

CASE NO. D-10-430639-DDEPT. 11

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

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

MOTION FOR/OPPOSITION TO Defendant's Motion for Reconsideration

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)

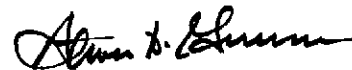
NOTE: If no boxes are checked, filing fee **MUST** be paid.

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

Date: March 13, 2015

Peter J Bellon  
Printed Name of Preparer

P Bellon #4528  
Signature of Preparer



CLERK OF THE COURT

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

DISTRICT COURT  
CLARK COUNTY, NEVADA

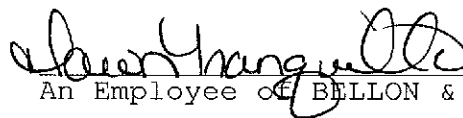
MATTHEW ROBERT GEIGER, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
JENNIFER ELISE GORDON, )  
 )  
Defendant )

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

CERTIFICATE OF MAILING

I, do hereby certify on the 13<sup>th</sup> day of March 2015, I did serve a true and correct copy of the Plaintiff's OPPOSITION TO DEFENDANT'S MOTION FOR RECONSIDERATION, NEW TRIAL AND AMENDMENT OF JUDGMENT PURSUANT TO RULE 59; AND RELIEF FROM JUDGMENTS PURSUANT TO RULE 60b(1) AND COUNTERMOTION TO ENFORCE THE TERMS OF THE OCTOBER 9, 2014 ORDER FOR ANOTHER CHILD INTERVIEW OR EVALUATION AND FOR ATTORNEY'S FEES AND RELATED RELIEF 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

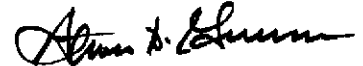


An Employee of BELLON & MANINGO, LTD.

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

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

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CLERK OF THE COURT

DISTRICT COURT  
CLARK COUNTY, NEVADA

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

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

**NOTICE OF ENTRY OF ORDER**

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

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

DATED this 20<sup>th</sup> day of March 2015.

BELLON & MANINGO, LTD.

By: 

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

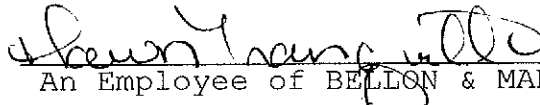
CERTIFICATE OF MAILING

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

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

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

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

  
An Employee of BELLON & MANINGO, LTD.

BELLON & MANINGO, LTD.

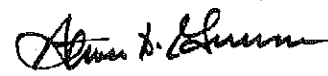
732 SOUTH SIXTH STREET, SUITE 102

LAS VEGAS, NEVADA 89101

702-452-6299 • 702-452-6298 FAX

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LAS VEGAS, NEVADA 89101  
702-452-6299 • 702-452-6298 FAX

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03/20/2015 10:28:08 AM

  
CLERK OF THE COURT

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

DISTRICT COURT  
CLARK COUNTY, NEVADA

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

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

ORDER

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

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

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

RECEIVED

MAR 11 2015

FAMILY COURT  
DEPARTMENT T

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

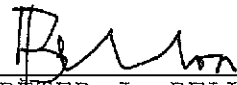
**IT IS FURTHER ORDERED** that this is a permanent Order by this Court sui sponte and is based on the children's interviews, which were supported by CPS records.

DATED this 18th day of March 2015.

  
DISTRICT COURT JUDGE, Family Division

**LISA M. BROWN** 

BELLON & MANINGO, LTD.

By:   
PETER J. BELLON, ESQ.  
Nevada Bar No. 004528  
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Attorney for Plaintiff

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(702) 234-9673  
Elise433@gmail.com  
Defendant in Proper Person

  
CLERK OF THE COURT

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: March 24, 2015

TIME: 9 am

REPLY TO OPPOSITION AND 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 TO OPPOSITION

Wiese v. Granata 887 P.2d 744, 110 Nev. 1410 (1994) "Litigants in a custody battle have the right to a full and fair (110 Nev. 1413) hearing concerning the ultimate disposition of a child. At a minimum, observance of this right requires that before a parent loses custody of a child, the elements that serve as a precondition to a change of custody must be supported by

1 factual evidence. Furthermore, the party threatened with the loss of PARENTAL RIGHTS  
2 MUST BE GIVEN THE OPPORTUNITY TO DISPROVE THE EVIDENCE PRESENTED."  
3 Jennifers parental rights were violated when the Court ruled against her boyfriend. Substantial  
4 changes were made without due process. There are several examples, as were given, in the  
5 Motion, of reasons why the original motions should be reheard and judgments changed. Mr.  
6 Bellon would like you to think that cases given were in poor form and do not truly apply to  
7 this case, that this is not an issue of "custody" but rather "parental"rights. However, any  
8 changes in custodial rights harbor on the "parental rights" definition. In every case stated,  
9 there was a significant change in parental rights without due process, the aggrieved parties did  
10 not receive a full and fair hearing, and in all cases the decisions were overturned. Without  
11 continually arguing the points that were clearly laid out in the Motion, we can look at the  
12 Wallace vs Wallace case 112 Nev. 1015, 922 P.2d 541 (1996). Both parties showed up for an  
13 evidentiary hearing over a Motion filed by Plaintiff to change/reduce Defendants visitations,  
14 however, near the end of the evidentiary hearing the Defendant stated he was moving out of  
15 state. The Court changed Plaintiffs visitations, in their entirety, giving Defendant a visitation  
16 schedule that considered his move to the other state and IN the other state based upon  
17 Defendants 'surprise' testimony about moving out of state. There was no evidence presented  
18 that this was in the childs best interest NOR was the Plaintiff prepared or given any time to  
19 present evidence as to why this was NOT in the childs best interest. The Wallace case was not  
20 about a modification of the designation of custody, as in this instant case. In Wallace, the  
21 Supreme Court stated "[112 Nev. 1020] We agree that the district court abused its discretion  
22 in imposing a visitation schedule based on Peiters relocation to Atlanta without accepting  
23 evidence and hearing argument on the ramifications of such visitation." They later said,  
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1 "neither the court nor Tracy were apprised of Pieters move to Atlanta until late in the hearing.  
2 No evidence was presented and no arguments were heard regarding an appropriate visitation  
3 schedule given this new location, which was new to Drake and would require him to travel  
4 long distances to reach. We conclude that the district court's judgment in regard to visitation  
5 was precipitous and must be reversed. The court characterized the case before it as basically a  
6 dispute over whether Drake should spend Wednesday nights with his father but then went well  
7 beyond that contested dispute and ordered visitation of much greater impact. The court had  
8 little or no factual basis to determine that the visitation ordered was in Drakes best interest,  
9 and Tracy had no notice that the court would be considering visitation requiring Drake to  
10 travel thousands of miles and therefore had no opportunity to present evidence on that issue.  
11 Cf. Wiese v. Granata, 110 Nev. 1410 1413, 887 P.2d 744, 746 (1994) (party threatened with  
12 loss of **parental rights** must be given opportunity to disprove evidence presented, and hearing  
13 did not provide such opportunity where other party presented no evidence); Moser v. Moser,  
14 108 Nev. 572, 576-77, 836 P.2d 63, 66 (1992) (litigants in custody proceeding have right to  
15 full and fair hearing, and preconditions to change of custody award must be supported by  
16 factual evidence)."

17 The exact same is applied to this case. We showed up to hear Motions regarding Plaintiffs  
18 MULTIPLE CONTEMPTS, for his repeated violations of his custodial rights(specifically  
19 pertaining the severity of son Chevy's brain condition and Plaintiff repeated failure to care for  
20 him or communicate to Defendant) , because he was STILL failing to pay his child support  
21 regardless of already being held in contempt and sentenced, to place restrictions on him for  
22 AGAIN traveling out of state with the children, and other lesser issues. It was also to hear  
23 testimony from the Plaintiffs probation officer regarding allegations that Plaintiff made in his  
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1 original counter motion that Jennifer had him arrested. Instead, the bulk consisted of  
2 testimony from the probation officer and Mr. Bellon continually trying to redirect the Court to  
3 the newly presented CPS records. The now infamous interview that seemed to seal the deal  
4 was conveniently requested by the Plaintiff. Plaintiff has been reprimanded before for  
5 coaching the children, and CPS records even stated the children had been coached... the  
6 misinterpretation was "by whom"?... Questions only the detectives and case workers can  
7 TRULY clarify. Mr. Bellon would like this Court to believe that there were no requests for  
8 continuances or objections made of any kind, but like the rest of his Opposition and  
9 Counter motion that couldn't be further from the truth. Going through the 'trial' once again,  
10 Mr. Zernich specifically asked at 3:24pm for the Courts to clarify what we are doing... Judge  
11 Nathan replies " sole legal custody based on his warrant, and conduct, and probation....."  
12 NOTHING REGARDING CPS REPORTS. At 3:27pm, even Judge Nathan seems confused  
13 as to what was being asked for contempt, she thinks it's all about child support. The trial  
14 continues but all around Plaintiffs incarceration. At 1 hour and 42 minutes into the trial,  
15 Jennifer is questioned by Mr. Bellon about abuse towards the children regarding her  
16 boyfriend. As things are going in circles and confusion is mounting Mr. Zernich objects and  
17 asks about proceeding with testimony regarding all the motions but is denied. 1 hour 44  
18 minutes into the trial at approx. 4:05 pm. At 2 hours and 5 minutes into the trial Mr. Zernich  
19 intervenes once again and states "it doesn't make any sense what conclusion the Court is  
20 finding". He then states, "probation officer was only called because of the opposition  
21 claiming that Jennifer was lying, that had nothing to do with the motions!" At 2 hours and 13  
22 minutes Mr. Zernich pleads with the Court that Chevys medical condition needs to be  
23 discussed then he asks the Court " if we can come back another day"... he then states " we  
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1 have a lot of things to present to the Court". At 2 hours and 15 minutes The Court asks if  
2 there is anything else... Mr. Zernich AGAIN asks " for a 2<sup>nd</sup> day for testimony".

3 No rules are flawed or misinterpreted, as Mr. Bellon has stated in his Opposition, and  
4 there were several attempts made on October 9, to bring this back to the Court for a full and  
5 fair hearing. Jennifers Motions were NOT heard and her due process rights to respond to the  
6 records, were not given. Her parental rights were sorely violated and all has suffered  
7 detrimental damage because of the straying from proper procedure.  
8

9  
10 **FACTS AND ARGUMENT TO COUNTERMOTION**  
11

12  
13 To bring your Honor up to speed without the continuous back and forth, and without  
14 dragging this out any further, I will give a quick review and answer a few of Matthew's latest  
15 allegations. Simply put, Matthews Opposition and Countermotion are 100% FALSE in its  
16 entirety. First and foremost, I would like to remind the Court where this all began. Jennifer's  
17 past with Matthew includes restraining orders against Matthew, which has resulted in the  
18 maximum sentencing, severe and detrimental substance abuse by Matthew, resulting in mental  
19 abuse on Jennifer and the children. documented parental alienation and coaching by Matthew,  
20 and his continuous confrontation with Jennifer and her boyfriend. The Courts initially ordered  
21 Matthew to take a psychological evaluation because he hit himself in the head with a  
22 flashlight, then called the police on Jennifer to try and get her arrested, another reason was  
23 because at another time he doused his truck in gasoline and tried to blow Jennifer and himself  
24 up, and because of the many other police calls to the house for similar situations including his  
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1 many suicide threats, one even involving North Las Vegas Swat. It's interesting, that now,  
2 Matthew would try and request the same against Jennifer.

3 This case has so much history and documentation that it becomes quite overwhelming  
4 very quickly. Everything should be taken into full and complete consideration or the  
5 consequence will be things can quickly become misconstrued, misinterpreted, and easily  
6 confused with what the reality actually is. I have provided a quick review to the Court so that  
7 the issues are not misconstrued. It is not Jennifer's credibility that is, OR HAS EVER BEEN,  
8 the one in question. Jennifer and the Court's numerous hearings have not been because of  
9 Jennifer's mental state and contempt of this Court's orders, but because of Matthews failure to  
10 abide by any Orders of this Court, his "above the law" take on life, and his repeated  
11 confrontation and lack of communication when it comes to the safety and well-being of the  
12 children. Matthew has been held in contempt several times and even sentenced, although  
13 suspended at the time, yet he continues in the same manner ( most recent was Orders of  
14 February 19, 2014). This has cost Jennifer and the children dearly. Jennifer has always been  
15 the one and only 'stable' parent. Judge Nathan was well aware of that and that's why she  
16 originally granted the Order Shortening Time for Jennifer's motions.

17  
18 Jennifer brought to the Court's attention an immediate concern for the safety of the  
19 children, particularly her son Chevys brain condition and the lack of communication or  
20 concern by Matthew. How ironic that Matthew would like to lead this Court to believe it to be  
21 the other way around. Judge Nathan made many rulings against Matthew because of these  
22 issues, however, no one could have forseen that both Matthew and Jennifer's boyfriend's ex  
23 would attack at the same time causing mass confusion in the Court system. Both Matthew and  
24 Heather (boyfriends ex) are both "high conflict" parents. Both have substance abuse issues  
25  
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28

1 and both file CPS and other reports when things don't go their way. I truly believe that  
2 Matthew may actually believe his own lies. To give an example, if you look back to  
3 Jennifer's original Motion filed on August 4, 2015, it's very clear that there is a serious issue.  
4 When reading the Opposition and Countermotion filed on August 25, 2015, one could easily  
5 get confused with the multiple accusations and other issues that are completely out of place,  
6 and backed up with ZERO documentation. Now go to Jennifer's Reply, filed on September  
7 12, 2015, to said Opposition and Countermotion and everything is pointed out, WITH  
8 DOCUMENTATION, to PROVE that everything Matthew claimed is a bold faced lie.

9  
10 Matthew then files his Pre-Trial Memorandum on October 3, 2015, and now his  
11 whole story has changed, yet again. In Court Matthew and his attorney apologized numerous  
12 times for the 'misunderstandings' that he had laid out in his Opposition. Another example that  
13 keeps getting brought up and even caused confusion with Judge Nathan. Matthew claims that  
14 Chevy has been wrestling even though it was previously ordered that he not. There has  
15 NEVER been an order stating that Chevy may not wrestle. Chevy wrestled years ago and  
16 loved it, but had to stop because of his brain condition known as Chiari Malformation Type 1.  
17 Chevy does not wrestle, nor has he in years, and EVERYONE associated with him is well  
18 aware and very cautious of his Chiari. In 2011 Matthew, alleged a lot of the same things and  
19 because Weston was complaining, Judge Nathan ordered that he no longer participate in any  
20 wrestling activity. ( order from March 29, 2011 ). Matthew and his mother had even filed a  
21 CPS report. Once the CPS report came back, unsubstantiated, and it was noted that the  
22 children were being coached by Matthew and there was parental alienation, the children  
23 started seeing Dr. Schnitzler, a child psychologist. At that time Judge Nathan agreed that if  
24 "Dr. Schnitzler says it's ok and the children want too", then she is ok with the children  
25  
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1 wrestling once again. (Weston did not wrestle for almost a year because of all of this)... That  
2 is also why there have been very STRICT orders since, regarding wrestling. (see order filed in  
3 minutes from November 07, 2013 " *If there are any scheduled wrestling tournaments for the*  
4 *children while they are in fathers custody, father is to make sure they get there.*"(see order  
5 filed February 11, 2014 " *If the children have WRESTLING clinics on dad's time, dad shall*  
6 *pick up the children after the clinics are done.*"

8 All of these Orders against Matthew to take the children to their tournaments, to their  
9 clinics, and even having a letter sent from Margaret Pickard, as requested by the Courts on  
10 May 1, 2014, ( filed on June 27, 2014) regarding the need for "parental support" in the  
11 activities that the children choose to participate in, ALL OF THIS so quickly forgotten when  
12 Heather filed her second round of police reports in Indiana and kidnapping the other children  
13 in Jennifer's house. How impossible it seems to try and explain how two parents striving to  
14 protect all of their children from the high conflict and abuse, could get so misunderstood.  
15 Matthew and Heather have NEVER submitted or even offered any kind of evidence or  
16 documentation to back up a single word that they have ever said or written, and because they  
17 have been allowed to do this repeatedly with no accountability, they do it over and over.

20 Jennifer and her boyfriend have MOUNDS of evidence, to support their request for  
21 relief, that they beg for someone to look at. To stop this madness once and for all, and to hold  
22 Matthew and Heather accountable for their continuous and malicious perjury, Jennifer  
23 requests a Motion for Reconsideration. Matthew claims that "her boyfriend continues to  
24 watch the minor children unsupervised and physically punishes them", yet that is completely  
25 preposterous because Matsy was forced, because of these Courts orders, to move to another  
26 state to work and has not lived here in months! Jennifer has been here all alone, with 6  
27  
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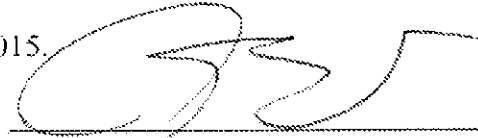
1 children, managing as much as she possibly can, given the burdens that have been placed on  
2 her shoulders. Matsy's children are in deep therapy because of the things that they went  
3 through and were subjected to this past summer with their mother, Heather; the same events  
4 that triggered the now infamous CPS reports. The same event's that are well documented  
5 through NUMEROUS detectives, and multiple CPS workers, yet were so gravely  
6 misinterpreted because of all the parental coaching... Coaching not on Jennifer or Matsy's  
7 part, but on Matthew and Heather's part . The CPS case worker on this case will gladly  
8 testify, upon subpoena, that her notes and the detective's notes were misread. Detective Gary  
9 Cox of the Ligonier Indiana Police Department will give an affidavit to the Court, upon  
10 request, at any time, to substantiate what Jennifer and Matsy have been saying all along.  
11  
12

13 I don't want to argue or bicker with the Plaintiff, and I truly don't think I need to go  
14 through his whole Opposition and Countermotion and refute every single allegation he has  
15 made, once again. I truly truly feel that the Court can see there is enough, just in Court filed  
16 documents, Orders, and Motions, to show that not only are Matthew's allegations in his  
17 Opposition and Countermotion false in its entirety, but that Matthew has been filing with  
18 malicious intent. The truth needs to be told, and proper sanctions and judgments be rectified.  
19 Jennifer and the children have been put through the ringer and is paying dearly for the actions  
20 of others. Matthew continues to perjur himself and has become even more defiant to the  
21 Orders of this court since October 9, leaving Jennifer and the entire family at his mercy.  
22  
23

24 The Orders that Mr. Bellon proposed were grossly reworded to the point of lacking the  
25 true significance behind the orders given that day, and crucial findings of the Court were  
26 mysteriously missing. Therefore we pray the Court ONLY goes off of the minutes when  
27 sorting through this mess.  
28

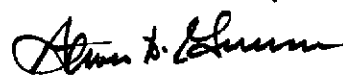
1 For the foregoing reasons I respectfully request for the relief sought in this Reply and  
2 my Motion.

3 DATED this 20 day of March, 2015.



5 JENNIFER GORDON  
6 91 Autumn Day Street  
7 Henderson, Nevada 89012  
8 (702) 234-9673  
9 Defendant in Proper Person  
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CLERK OF THE COURT

CERT

Name: Jennifer Gordon

Address: 91 Autumn Day Street

Henderson, NV 89012

Telephone: 7022349673

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: T

**CERTIFICATE OF MAILING**

I, (name of person who mailed the document) Jennifer Gordon, 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) 20th, (year) 2015, service of the:

(☒ check all that apply)

☐ Motion

☐ Answer

☐ Financial Disclosure Form

☐ Opposition

☒ Reply

☐ Notice of Entry of Judgment / Order / Decree

☐ Other: \_\_\_\_\_

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

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

Peter J. Bellon, ESQ.

732 South Sixth street, Suite 102

Las Vegas, NV 89101

*and by e-serving date@bellonandmaningo.com*

*Dawn Tranquillo*

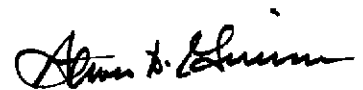
*and e-serving*

*PJ Bellon@bellonandmaningo.com*

*Peter J. Bellon, ESQ*

DATED this 20 day of March, 2015

(Signature)



CLERK OF THE COURT

ORD  
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Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

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

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

ORDER

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

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

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

RECEIVED

MAR 11 2015

FAMILY COURT  
DEPARTMENT T

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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


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

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

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

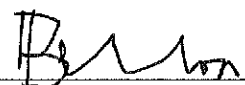
**IT IS FURTHER ORDERED** that this is a permanent Order by this Court sui sponte and is based on the children's interviews, which were supported by CPS records.

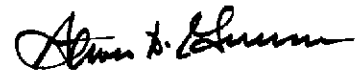
DATED this 18th day of March 2015.

  
DISTRICT COURT JUDGE, Family Division

**LISA M. BROWN**

BELLON & MANINGO, LTD.

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



CLERK OF THE COURT

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

DISTRICT COURT  
CLARK COUNTY, NEVADA

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

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

ORDER

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

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

Non-Trial Dispositions:  
☐ Other  
☐ Dismissed - Want of Prosecution  
☐ Involuntary (Statutory) Dismissal  
☐ Default Judgment  
☐ Transferred  
☐ Disposed After Trial Start  
Settled/Withdrawn:  
☐ Without Judicial Conf/Hrg  
☒ With Judicial Conf/Hrg  
☐ By ADR  
Trial Dispositions:  
☐ Judgment Reached by Trial

RECEIVED

MAR 25 2015

FAMILY COURT  
DEPARTMENT 1

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

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

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

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

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

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

consent of the other parent to move the children from the State. Should the non-custodial parent refuse to give that consent, the parent planning the move shall, before he/she leaves the state with the children, petition the court for permission to move the children. Failure of a parent to comply with the provisions of this section may be considered as a factor if a change of custody is requested by the noncustodial parent.

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

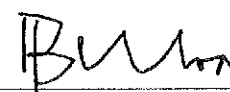
**IT IS FURTHER ORDERED** that there shall be no award of Attorney's Fees to Plaintiff at this time.

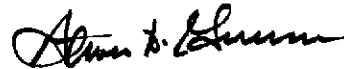
DATED this 8th day of April, 2015

  
DISTRICT COURT JUDGE, Family Division

**LISA M. BROWN** 

BELLON & MANINGO, LTD.

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



CLERK OF THE COURT

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

DISTRICT COURT  
CLARK COUNTY, NEVADA

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

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

NOTICE OF ENTRY OF ORDER

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

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

DATED this 10th day of April 2015.

BELLON & MANINGO, LTD.

By: 

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

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

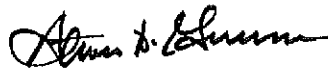
CERTIFICATE OF MAILING

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

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

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

  
An Employee of BELLON & MANINGO, LTD.

  
CLERK OF THE COURT

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

DISTRICT COURT  
CLARK COUNTY, NEVADA

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

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

ORDER

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

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

Non-Trial Dispositions:  
☐ Other  
☐ Dismissed - Want of Prosecution  
☐ Involuntary (Statutory) Dismissal  
☐ Default Judgment  
☐ Transferred  
☐ Disposed After Trial Start  
Settled/Withdrawn:  
☐ Without Judicial Conf/Hrg  
☒ With Judicial Conf/Hrg  
☐ By ADR  
Trial Dispositions:  
☐ Judgment Reached by Trial

RECEIVED

MAR 25 2015

FAMILY COURT  
DEPARTMENT 7

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

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

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

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

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

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



consent of the other parent to move the children from the State. Should the non-custodial parent refuse to give that consent, the parent planning the move shall, before he/she leaves the state with the children, petition the court for permission to move the children. Failure of a parent to comply with the provisions of this section may be considered as a factor if a change of custody is requested by the noncustodial parent.

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


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

DATED this 8th day of April, 2015

  
DISTRICT COURT JUDGE, Family Division

**LISA M. BROWN** 

BELLON & MANINGO, LTD.

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

ORIGINAL

*Alvin D. Bellon*  
CLERK OF THE COURT

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

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

MATTHEW GEIGER

Plaintiff,

vs.

JENNIFER GORDON,

Defendant.

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

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

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

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

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

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

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

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

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

**PLEADING  
CONTINUES  
IN NEXT  
VOLUME**