

IN THE SUPREME COURT OF THE STATE OF NEVADA

INDICATE FULL CAPTION:

AMANDA REED,

Appellant,

v.

DEVIN REED,

Respondent.

No. 79095

Electronically Filed
Jul 24 2019 01:33 p.m.

Elizabeth A. Brown
Clerk of Supreme Court

DOCKETING STATEMENT
CIVIL APPEALS

GENERAL INFORMATION

Appellants must complete this docketing statement in compliance with NRAP 14(a). The purpose of the docketing statement is to assist the Supreme Court in screening jurisdiction, identifying issues on appeal, assessing presumptive assignment to the Court of Appeals under NRAP 17, scheduling cases for oral argument and settlement conferences, classifying cases for expedited treatment and assignment to the Court of Appeals, and compiling statistical information.

WARNING

This statement must be completed fully, accurately and on time. NRAP 14(c). The Supreme Court may impose sanctions on counsel or appellant if it appears that the information provided is incomplete or inaccurate. *Id.* Failure to fill out the statement completely or to file it in a timely manner constitutes grounds for the imposition of sanctions, including a fine and/or dismissal of the appeal.

A complete list of the documents that must be attached appears as Question 27 on this docketing statement. Failure to attach all required documents will result in the delay of your appeal and may result in the imposition of sanctions.

This court has noted that when attorneys do not take seriously their obligations under NRAP 14 to complete the docketing statement properly and conscientiously, they waste the valuable judicial resources of this court, making the imposition of sanctions appropriate. See KDI Sylvan Pools v. Workman, 107 Nev. 340, 344, 810 P.2d 1217, 1220 (1991). Please use tab dividers to separate any attached documents.

1. Judicial District Eighth Department F
County Clark Judge Denise Genitle
District Ct. Case No. D-18-568055-D

2. Attorney filing this docketing statement:

Attorney F. Peter James, Esq. Telephone 702-256-0087
Firm Law Offices of F. Peter James, Esq.
Address 3821 West Charleston Blvd., Suite 250
Las Vegas, Nevada 89102

Client(s) Appellant, Amanda Reed.

If this is a joint statement by multiple appellants, add the names and addresses of other counsel and the names of their clients on an additional sheet accompanied by a certification that they concur in the filing of this statement.

3. Attorney(s) representing respondents(s):

Attorney Louis C. Schneider, Esq. Telephone 702-435-2121
Firm Law offices of Louis C. Schneider, LLC
Address 430 South 7th Street
Las Vegas, Nevada 89101

Client(s) Respondent, Devin Reed

Attorney _____ Telephone _____
Firm _____
Address _____

Client(s) _____

(List additional counsel on separate sheet if necessary)

4. Nature of disposition below (check all that apply):

- | | |
|---|---|
| <input type="checkbox"/> Judgment after bench trial | <input type="checkbox"/> Dismissal: |
| <input type="checkbox"/> Judgment after jury verdict | <input type="checkbox"/> Lack of jurisdiction |
| <input type="checkbox"/> Summary judgment | <input type="checkbox"/> Failure to state a claim |
| <input type="checkbox"/> Default judgment | <input type="checkbox"/> Failure to prosecute |
| <input type="checkbox"/> Grant/Denial of NRCP 60(b) relief | <input type="checkbox"/> Other (specify): _____ |
| <input type="checkbox"/> Grant/Denial of injunction | <input type="checkbox"/> Divorce Decree: |
| <input type="checkbox"/> Grant/Denial of declaratory relief | <input type="checkbox"/> Original <input type="checkbox"/> Modification |
| <input type="checkbox"/> Review of agency determination | <input checked="" type="checkbox"/> Other disposition (specify): <u>motion denied</u> |

5. Does this appeal raise issues concerning any of the following?

- ☒ Child Custody
- ☐ Venue
- ☐ Termination of parental rights

6. Pending and prior proceedings in this court. List the case name and docket number of all appeals or original proceedings presently or previously pending before this court which are related to this appeal:

N/A

7. Pending and prior proceedings in other courts. List the case name, number and court of all pending and prior proceedings in other courts which are related to this appeal (e.g., bankruptcy, consolidated or bifurcated proceedings) and their dates of disposition:

Devin Reed v. Amanda Reed; D-18-568055-D; Eighth Judicial District Court; Clark County, Nevada

Date of Order at issue: May 29, 2019

8. Nature of the action. Briefly describe the nature of the action and the result below:

This is a divorce action. Child custody had been resolved as a final order. Before entry of final decree, Appellant moved the district court to modify child custody. The district court denied this request. This appeal followed.

9. Issues on appeal. State concisely the principal issue(s) in this appeal (attach separate sheets as necessary):

Whether the district court erred in denying the request to modify child custody.

Whether the district court erred in denying a child custody evaluation.

10. Pending proceedings in this court raising the same or similar issues. If you are aware of any proceedings presently pending before this court which raises the same or similar issues raised in this appeal, list the case name and docket numbers and identify the same or similar issue raised:

None known.

11. Constitutional issues. If this appeal challenges the constitutionality of a statute, and the state, any state agency, or any officer or employee thereof is not a party to this appeal, have you notified the clerk of this court and the attorney general in accordance with NRAP 44 and NRS 30.130?

☒ N/A

☐ Yes

☐ No

If not, explain:

12. Other issues. Does this appeal involve any of the following issues?

☐ Reversal of well-settled Nevada precedent (identify the case(s))

☐ An issue arising under the United States and/or Nevada Constitutions

☒ A substantial issue of first impression

☐ An issue of public policy

☐ An issue where en banc consideration is necessary to maintain uniformity of this court's decisions

☐ A ballot question

If so, explain: The standard for denial of a child custody evaluation has never been published in Nevada.

13. Assignment to the Court of Appeals or retention in the Supreme Court. Briefly set forth whether the matter is presumptively retained by the Supreme Court or assigned to the Court of Appeals under NRAP 17, and cite the subparagraph(s) of the Rule under which the matter falls. If appellant believes that the Supreme Court should retain the case despite its presumptive assignment to the Court of Appeals, identify the specific issue(s) or circumstance(s) that warrant retaining the case, and include an explanation of their importance or significance:

This matter is presumptively assigned to the Court of Appeals as this is a matter in family court not involving termination of parental rights or Chapter 432B proceedings. See NRAP 17(b)(10).

Appellant does not assert at this time that the matter should be retained by the Supreme Court.

14. Trial. If this action proceeded to trial, how many days did the trial last? 0 _____

Was it a bench or jury trial? N/A _____

15. Judicial Disqualification. Do you intend to file a motion to disqualify or have a justice recuse him/herself from participation in this appeal? If so, which Justice?
N/A

TIMELINESS OF NOTICE OF APPEAL

16. Date of entry of written judgment or order appealed from May 29, 2019

If no written judgment or order was filed in the district court, explain the basis for seeking appellate review:

17. Date written notice of entry of judgment or order was served Jun 10, 2019

Was service by:

☐ Delivery

☒ Mail/electronic/fax

18. If the time for filing the notice of appeal was tolled by a post-judgment motion (NRCP 50(b), 52(b), or 59)

(a) Specify the type of motion, the date and method of service of the motion, and the date of filing.

☐ NRCP 50(b) Date of filing _____

☐ NRCP 52(b) Date of filing _____

☐ NRCP 59 Date of filing _____

NOTE: Motions made pursuant to NRCP 60 or motions for rehearing or reconsideration may toll the time for filing a notice of appeal. See AA Primo Builders v. Washington, 126 Nev. ___, 245 P.3d 1190 (2010).

(b) Date of entry of written order resolving tolling motion _____

(c) Date written notice of entry of order resolving tolling motion was served _____

Was service by:

☐ Delivery

☐ Mail

19. Date notice of appeal filed Jun 21, 2019

If more than one party has appealed from the judgment or order, list the date each notice of appeal was filed and identify by name the party filing the notice of appeal:

20. Specify statute or rule governing the time limit for filing the notice of appeal, e.g., NRAP 4(a) or other

NRAP 4(a)

SUBSTANTIVE APPEALABILITY

21. Specify the statute or other authority granting this court jurisdiction to review the judgment or order appealed from:

(a)

- | | |
|--|---------------------------------------|
| <input type="checkbox"/> NRAP 3A(b)(1) | <input type="checkbox"/> NRS 38.205 |
| <input type="checkbox"/> NRAP 3A(b)(2) | <input type="checkbox"/> NRS 233B.150 |
| <input type="checkbox"/> NRAP 3A(b)(3) | <input type="checkbox"/> NRS 703.376 |
| <input checked="" type="checkbox"/> Other (specify) <u>NRAP 3A(b)(8)</u> | |
-

(b) Explain how each authority provides a basis for appeal from the judgment or order:

This is an appeal from a special order after final judgment. The initial custody determination (entered February 27, 2019) was a final order. A custody determination that finalizes custody is a final order and is independently appealable. See *Barry v. Lindner*, 119 Nev. 661, 669, 81 P.3d 537, 542-43 (2003). Later, Appellant moved the district court to modify custody, which the district court denied. This last order is a special order after final judgment per NRAP 3A(b)(8). This appeal followed.

22. List all parties involved in the action or consolidated actions in the district court:

(a) Parties:

Appellant, Amanda Reed

Respondent, Devin Reed.

(b) If all parties in the district court are not parties to this appeal, explain in detail why those parties are not involved in this appeal, *e.g.*, formally dismissed, not served, or other:

23. Give a brief description (3 to 5 words) of each party's separate claims, counterclaims, cross-claims, or third-party claims and the date of formal disposition of each claim.

The only issue here is child custody. The order on appeal was filed May 29, 2019.

24. Did the judgment or order appealed from adjudicate ALL the claims alleged below and the rights and liabilities of ALL the parties to the action or consolidated actions below?

☐ Yes

☒ No

25. If you answered "No" to question 24, complete the following:

(a) Specify the claims remaining pending below:

The divorce is still pending. Child custody was entered as a final order, then a motion to modify that was filed and denied. Child custody is independent from the remainder of the divorce action. The issues of assets, debts, alimony, and divorce remain below.

(b) Specify the parties remaining below:

(c) Did the district court certify the judgment or order appealed from as a final judgment pursuant to NRCP 54(b)?

☐ Yes

☒ No

(d) Did the district court make an express determination, pursuant to NRCP 54(b), that there is no just reason for delay and an express direction for the entry of judgment?

☐ Yes

☒ No

26. If you answered "No" to any part of question 25, explain the basis for seeking appellate review (e.g., order is independently appealable under NRAP 3A(b)):

A custody determination that finalizes custody is a final order and is independently appealable. See *Barry v. Lindner*, 119 Nev. 661, 669, 81 P.3d 537, 542-43 (2003). The Order filed on February 27, 2019 finalized all custody issues and, thus, is a final order.

Later, Appellant moved the district court to modify custody, which the district court denied. This last order is a special order after final judgment per NRAP 3A(b)(8). This appeal followed.

27. Attach file-stamped copies of the following documents:

- e The latest-filed complaint, counterclaims, cross-claims, and third-party claims
- e Any tolling motion(s) and order(s) resolving tolling motion(s)
- e Orders of NRCP 41(a) dismissals formally resolving each claim, counterclaims, cross-claims and/or third-party claims asserted in the action or consolidated action below, even if not at issue on appeal
- e Any other order challenged on appeal
- e Notices of entry for each attached order

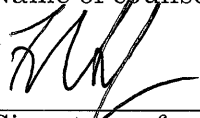
VERIFICATION

I declare under penalty of perjury that I have read this docketing statement, that the information provided in this docketing statement is true and complete to the best of my knowledge, information and belief, and that I have attached all required documents to this docketing statement.

Amanda Reed
Name of appellant

Jul 24, 2019
Date

F. Peter James, Esq.
Name of counsel of record


Signature of counsel of record

Clark County, Nevada
State and county where signed

CERTIFICATE OF SERVICE

I certify that on the _____ day of _____, _____, I served a copy of this completed docketing statement upon all counsel of record:

- ☐ By personally serving it upon him/her; or
- ☐ By mailing it by first class mail with sufficient postage prepaid to the following address(es): (NOTE: If all names and addresses cannot fit below, please list names below and attach a separate sheet with the addresses.)

Dated this _____ day of _____, _____

Signature

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to

Louis Schneider, Esq.
Counsel for Respondent

M. Nelson Segel
Settlement Conference Judge

Amanda S. Hemin
CLERK OF THE COURT

ORIGINAL

1 **COMD**
2 DEVIN REED
3 4416 Cinderwood Ct.
4 N. Las Vegas, NV 89032
5 (702) 238-8710
6 Defendant In Proper Person

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

9 DEVIN REED ,)

10 Plaintiff,)

11 vs.)

12 AMANDA REED,)

13 Defendant,)

CASE NO:
DEPT NO:

D-18-568055-D

Dept. F

14 **COMPLAINT FOR DIVORCE**

15 COMES NOW the Plaintiff, DEVIN REED representing himself In
16 Proper Person, and for his cause of action for DIVORCE against the
17 Defendant, AMANDA REED complains and alleges as follows:

18 **I.**

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

23 **II.**

24 At all times herein relevant, Defendant was a resident of the
25 State of Nevada. Defendant is the natural mother of the minor
26 children.

27 **III.**

28 That were married to each other October 2nd, 2008, in Las
Vegas, Nevada, and ever since have been and continue to be husband
and wife. That the parties are incompatible in marriage.

1 **IV.**

2 That there are two (2) minor children born the issue of
3 their marriage, namely, ABBY REED, born April 6th, 2013; and SHAWN
4 REED, born July 3rd, 2015.

5 That the State of Nevada is the habitual residence of the minor
6 children.

7 **V.**

8 That the parties hereto are fit and proper persons to be
9 awarded joint legal Custody with an order for joint physical custody
10 in an equal timeshare arrangement.

11 **VI.**

12 For an order that neither party pay child support to the other
13 or that it be based upon Wright v. Osburn with appropriate offsets
14 per NRS 125B.070 and NRS 125B.080.

15 That both parties be equally responsible to provide health
16 insurance for the minor children when available through their
17 respective employers; and that the parties equally divide any unpaid
18 or un-reimbursed medical expenses of the minor children.

19 **VII.**

20 That the parties alternate or otherwise split the dependent tax
21 exemption for the minor children annually.

22 **VIII.**

23 That neither party pay spousal support to the other.

24 **IX.**

25 That there are community assets and community debts to be
26 adjudicated by this court, that Plaintiff is asking that the Court
27 divide the community assets and debts of the parties equitably. That
28 there is a marital residence which the parties both continue to

1 occupy at this time and both parties have pensions which he asks
2 that they leave as their sole and separate respective properties.

3 **X.**

4 That Plaintiff is entitled to his costs and disbursements and
5 attorney's fees.

6 WHEREFORE, Plaintiff prays for judgment as follows:

7 1. For an order granting the parties joint legal custody and
8 joint physical custody of the minor children with an equal timeshare
9 arrangement.

10 2. For an order that child support is based upon Wright v.
11 Osburn with appropriate offsets per NRS 125B.070 and NRS 125B.080.

12 3. That both parties be equally responsible to provide health
13 insurance for the minor children when available through their
14 respective employers; and that the parties equally divide and pay
15 any unpaid medical expenses of the minor children, including any
16 deductibles and co-payments.

17 4. That the parties alternate or otherwise split the
18 dependent tax exemption for the minor children.

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

20 6. That there are community assets and community
21 debts to be adjudicated by this court; that the court divide the
22 community assets and community debts of the parties equitably;

23 7. For Plaintiff's costs, disbursements and attorneys
24 fees.

25
26
27
28 /////

1 8. For such other and further relief as the court may deem
2 just and proper.

3 DATED this 20 day of March, 2018.

4 Respectfully submitted:

5 

6 **DEVIN REED**

7 4416 Cinderwood Ct.
8 N. Las Vegas, NV 89032
9 (702) 807-2436
10 Plaintiff In Proper Person
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VERIFICATION

STATE OF NEVADA)
COUNTY OF CLARK) ss.


DEVIN REED under penalties of perjury, being first duly sworn, deposes and says:

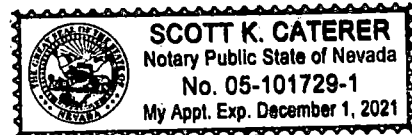
That he is the Plaintiff in the above-entitled action; that he has read the foregoing **COMPLAINT FOR DIVORCE** and knows the contents thereof; that the same is true of his own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, he believes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


DEVIN REED

SUBSCRIBED and SWORN to before me

this 20 day of MARCH, 2018


NOTARY PUBLIC in and for
Said County and State

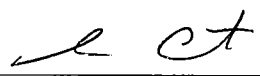


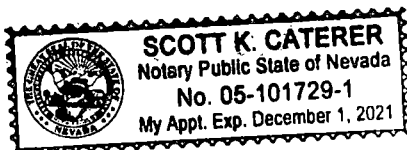
ACKNOWLEDGMENT

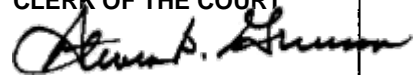
STATE OF NEVADA)
COUNTY OF CLARK) ss.

On this 20 day of MARCH, 2018, before me, the undersigned Notary Public in and for said County and State, appeared, **DEVIN REED** known to me to be the person described in and who executed the foregoing instrument and who acknowledged to me that he did so freely and voluntarily and for the uses and purposes mentioned therein.

WITNESSETH my hand and official seal.


NOTARY PUBLIC





1 ANS
2 HARVEY GRUBER, ESQ.
3 Nevada Bar No. 6329
4 MAYFIELD, GRUBER & SHEETS
5 223 Water Street, Suite C
6 Henderson, Nevada 89015
7 (702) 566-4099
8 Attorney for Defendant/Counterclaimant
9 **AMANDA REED**

10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

12 DEVIN REED,
13 Plaintiff/Counterdefendant,
14 vs.
15 AMANDA REED,
16 Defendant/Counterclaimant,

CASE NO. D-18-568055-D
DEPT. NO. F

ANSWER AND COUNTERCLAIM

17
18 Defendant, AMANDA REED, by and through her attorney, HARVEY GRUBER, ESQ.,
19 of the Law Offices of MAYFIELD, GRUBER & SHEETS answers Plaintiff's Complaint for
20 Divorce as follows:

- 21
- 22 1. Answering Paragraphs 1 and 2 of Plaintiff's Complaint on file herein, this
23 Answering Defendant admits all of the allegations contained therein.
- 24 2. Answering Paragraph 3 of Plaintiff's Complaint on file herein, this Answering
25 Defendant admits all of the allegations contained therein however, the correct date of the
26 marriage is October 2nd, 2010.
27
28

3. Answering Paragraph 4 of Plaintiff's Complaint on file herein, this Answering Defendant admits all of the allegations contained therein.

4. Answering Paragraphs 5, 6, 7 and 8 of Plaintiff's Complaint on file herein, this Answering Defendant denies all of the allegations contained therein.

5. Answering Paragraph 9 of Plaintiff's Complaint on file herein, this Answering Defendant admits in part and denies in part the allegations contained herein, the marital residence was purchased prior to marriage by the defendant and should be in her exclusive possession and all pensions should be split and equitably divided.

COUNTERCLAIM

Defendant/Counterclaimant, AMANDA REED, by and through her counsel, HARVEY GRUBER, ESQ., of the Law Offices of MAYFIELD, GRUBER & SHEETS, alleges as follows:

1. Defendant/Counterclaimant is and, for a period of more than six weeks immediately preceding the filing of this Counterclaim, has been an actual bona fide resident of the State of Nevada and actually, physically and corporeally domiciled herein during all of said period of time.

2. Defendant/Counterclaimant and Plaintiff/Counterdefendant were duly and lawfully married in Las Vegas Nevada on October 2nd, 2010.

3. There are two minor children born the issue of this marriage, to wit: ABIGAIL REED, born April 6, 2013; and SHAWN REED, born July 3, 2015.

4. The parties hereto should be awarded joint legal custody of the minor child, with DEFENDANT/Counterclaimant having primary physical custody and PLAINTIFF/Counterdefendant having rights of visitation. With supervised visitation occurring the first and third weekends of each month. Defendant is to have the children from 9 AM until 6

1 PM on Saturdays and 8 AM to 5 PM on Sundays. There is to be no overnight visitation until the
2 PLAINTIFF/Counterdefendant can demonstrate he is drug free. However, no visitation will be
3 ordered until the PLAINTIFF/Counterdefendant completes the cope class.
4

5 5. PLAINTIFF/Counterdefendant should provide the statutory sum of 25% of his
6 gross monthly wages per month, for support of the minor children until the minor children
7 graduate high school or reach the age of majority, whichever is greater.

8 DEFENDANT/Counterclaimant AMANDA REED will claim the minor children as a tax
9 deduction with the I.R.S. every year until the minor children reach the age of 18.
10

11 6. That both Plaintiff and Defendant shall maintain a policy of medical insurance
12 benefits for the minor children. Any expenses pertaining to medical treatment and care of the
13 minor children not covered by health insurance is to be split equally between the parties until the
14 children reach the age of majority, subject to the 30/30 rule.
15

16 7. There is community property of the parties that is to be divided between the
17 parties as set forth below:

18 DEFENDANT/Counterclaimant AMANDA REED will keep the following property as
19 her sole and separate property:

- 20
- 21 (a) The Residence located at 4416 Cinderwood Ct., North Las Vegas, NV
 - 22 89032;
 - 23 (b) 2008 Ford Expedition;
 - 24 (c) An equitable and equal split of all pension and retirement accounts;
 - 25 (d) Half of the equity of the 2002 Ford Motorhome;
 - 26 (e) All property currently in her possession.
 - 27
 - 28

1 PLAINTIFF/Counterdefendant DEVIN REED will keep the following as his sole and
2 separate property:

- 3 (a) 2015 Dodge truck. To be Financed in DEVIN REED's name within 30
4 days. If Mr. REED cannot finance the truck in his name, AMANDA
5 REED agrees to continue to have the truck in her name provided that
6 DEVIN REED makes timely payments on the vehicle, keeps the vehicle
7 insured and gives AMANDA REED the spare key. Should DEVIN REED
8 miss ONE (1) payment, AMANDA REED will have the full right to
9 repossess the vehicle and sell it. Any deficiency from the sale of the
10 vehicle shall be DEVIN REED's separate debt.
11
12 (b) 2002 Ford Motorhome, after paying AMANDA REED half the equity;
13
14 (c) An equitable and equal split of all pension and retirement accounts;
15
16 (d) All property currently in his possession.

17 8. There are community debts of the parties that is to be divided between the parties as
18 set forth below:

19 DEFENDANT/Counterclaimant AMANDA REED will keep the following debt as her
20 sole and separate debt:

- 21
22 (a) The Mortgage on the residence located at 4416 Cinderwood Ct., North Las
23 Vegas, NV 89032;
24
25 (b) Half of the credit card debt in the parties' names:
26 1. Disney Chase \$8,578.47;
27 2. Chase Slate \$3,399;
28 3. Discover \$5,257.22;

4. Lowe's \$3,920.34;
5. Care Credit \$7,900.00;
6. Naivent St. Loans \$6,355.11.

(c) An equitable and equal split of the medical expenses that the parties' owe for Shawn Reed to Shadow Emergency physicians in the amount of \$1,329.00 and Desert Valley Pediatrics in the amount of \$12.99.

PLAINTIFF/Counterdefendant DEVIN REED will keep the following as his sole and separate debt:

(a) The amount owing on the 2015 Dodge truck. To be Financed in DEVIN REED's name within 30 days. If Mr. REED cannot finance the truck in his name, AMANDA REED agrees to continue to have the truck in her name provided that DEVIN REED makes timely payments on the vehicle, keeps the vehicle insured and gives AMANDA REED the spare key. Should DEVIN REED miss ONE (1) payment, AMANDA REED will have the full right to repossess the vehicle and sell it. Any deficiency from the sale of the vehicle shall be DEVIN REED's separate debt.

(b) Half of the credit card debt in the parties' names:

1. Disney Chase \$8,578.47;
2. Chase Slate \$3,399;
3. Discover \$5,257.22;
4. Lowe's \$3,920.34;
5. Care Credit \$7,900.00;
6. Naivent St. Loans \$6,355.11.

1 (c) An equitable and equal split of the medical expenses that the parties' owe for
2 Shawn Reed to Shadow Emergency physicians in the amount of \$1,329.00 and
3 Desert Valley Pediatrics in the amount of \$12.99.
4

5 9. PLAINTIFF/Counterdefendant shall pay DEFENDANT/Counterclaimant's
6 reasonable attorney's fees and costs incurred herein.

7 10. That DEFENDANT/Counterclaimant does desire restoration of her former name.

8 11. The parties hereto are incompatible in marriage.
9

10
11 WHEREFORE, Defendant/Counterclaimant prays for judgment against Plaintiff/
12 Counterdefendant as follows:

13 1. That Plaintiff/Counterdefendant take nothing by way of his Complaint for Divorce
14 on file herein.

15
16 2. The parties hereto should be awarded joint legal custody of the minor child, with
17 DEFENDANT/Counterclaimant having primary physical custody and
18 PLAINTIFF/Counterdefendant having rights of visitation. With supervised visitation occurring
19 the first and third weekends of each month. PLAINTIFF/Counterdefendant is to have the
20 children from 9 AM until 6 PM on Saturday and 8 AM to 5 PM on Sunday. There is to be no
21 overnight visitation until the PLAINTIFF/Counterdefendant can demonstrate he is drug free.
22 However, no visitation will be ordered until the PLAINTIFF/Counterdefendant completes the
23 cope class.
24

25 3. PLAINTIFF/Counterdefendant should provide the statutory sum of 25% of his
26 gross monthly wages per month, for support of the minor children until the minor children
27 graduate high school or reach the age of majority, whichever is greater.
28

1 DEFENDANT/Counterclaimant AMANDA REED will claim the minor children as a tax
2 deduction with the I.R.S. every year until the minor children reach the age of 18.

3
4 4. That both Plaintiff/Counterdefendant and Defendant/Counterclaimant shall
5 maintain a policy of medical insurance benefits for the minor children. Any expenses pertaining
6 to medical treatment and care of the minor children not covered by health insurance is to be split
7 equally between the parties until the children reach the age of majority, subject to the 30/30 rule.

8
9 5. There is community property of the parties that is to be divided between the
10 parties as set forth below:

11 DEFENDANT/Counterclaimant AMANDA REED will keep the following property as
12 her sole and separate property:

- 13 (a) The Residence located at 4416 Cinderwood Ct., North Las Vegas, NV 89032;
14 (b) 2008 Ford Expedition;
15 (c) An equitable and equal split of all pension and retirement accounts;
16 (d) Half of the equity of the 2002 Ford Motorhome;
17 (e) All property currently in her possession.
18

19 Defendant DEVIN REED will keep the following as his sole and separate property:

- 20 (a) 2015 Dodge truck. To be Financed in DEVIN REED's name within 30 days.

21 If Mr. REED cannot finance the truck in his name, AMANDA REED agrees
22 to continue to have the truck in her name provided that DEVIN REED makes
23 timely payments on the vehicle, keeps the vehicle insured and gives
24 AMANDA REED the spare key. Should DEVIN REED miss ONE (1)
25 payment, AMANDA REED will have the full right to repossess the vehicle
26
27
28

1 and sell it. Any deficiency from the sale of the vehicle shall be DEVIN
2 REED's separate debt;

3 (b) 2002 Ford Motorhome, after paying AMANDA REED half the equity;

4 (c) An equitable and equal split of all pension and retirement accounts;

5 (d) All property currently in his possession.

6
7 6. There is community debt of the parties that is to be divided between the parties as
8 set forth below:

9
10 DEFENDANT/Counterclaimant AMANDA REED will keep the following debt as her
11 sole and separate debt:

12 (a) The Mortgage on the residence located at 4416 Cinderwood Ct., North Las
13 Vegas, NV 89032;

14 (b) Half of the credit card debt in the parties' names:

15 1. Disney Chase \$8,578.47;

16 2. Chase Slate \$3,399;

17 3. Discover \$5,257.22;

18 4. Lowe's \$3,920.34;

19 5. Care Credit \$7,900.00;

20 6. Naivent St. Loans \$6,355.11.

21
22
23 (c) An equitable and equal split of the medical expenses that the parties' owe for
24 Shawn Reed to Shadow Emergency physicians in the amount of \$1,329.00 and
25 Desert Valley Pediatrics in the amount of \$12.99.

26
27 PLAINTIFF/Counterdefendant DEVIN REED will keep the following as his sole and
28 separate debt:

1 (a) The amount owing on the 2015 Dodge truck. To be Financed in DEVIN
2 REED's name within 30 days. If Mr. REED cannot finance the truck in his
3 name, AMANDA REED agrees to continue to have the truck in her name
4 provided that DEVIN REED makes timely payments on the vehicle, keeps the
5 vehicle insured and gives AMANDA REED the spare key. Should DEVIN
6 REED miss ONE (1) payment, AMANDA REED will have the full right to
7 repossess the vehicle and sell it. Any deficiency from the sale of the vehicle
8 shall be DEVIN REED's separate debt.
9

10
11 (b) Half of the credit card debt in the parties' names:

- 12 1. Disney Chase \$8,578.47;
- 13 2. Chase Slate \$3,399;
- 14 3. Discover \$5,257.22;
- 15 4. Lowe's \$3,920.34;
- 16 5. Care Credit \$7,900.00;
- 17 6. Naivent St. Loans \$6,355.11.

18
19 (c) An equitable and equal split of the medical expenses that the parties' owe
20 for Shawn Reed to Shadow Emergency physicians in the amount of \$1,329.00 and Desert
21 Valley Pediatrics in the amount of \$12.99.
22

23 7. PLAINTIFF/Counterdefendant should pay DEFENDANT/Counterclaimant's
24 reasonable attorney's fees and costs incurred herein.

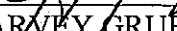
25 8. That DEFENDANT/Counterclaimant does desire restoration of her former name.
26

27 ...

28 ...

9. For such other and further relief as this Court deems just and proper.

MAYFIELD, GRUBER & SHEETS

BY 
 HARVEY GRUBER, ESQ.
 Nevada Bar No. 6329
 223 Water Street, Suite C
 Henderson, Nevada 89015
 (702) 566-4099
 Attorney for DEFENDANT/Counterclaimant
AMANDA REED

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VERIFICATION

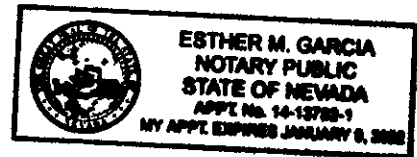
STATE OF NEVADA)
)ss:
COUNTY OF CLARK)

AMANDA REED, being first duly sworn, deposes and says:

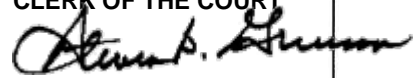
That I am the Defendant/Counterclaimant in the above-entitled action; that I have read the foregoing Answer and Counterclaim and know the contents thereof; the same is true of my own knowledge except as to those matters therein stated on information and belief and, as to those matters, I believe them to be true.

Amanda Reed
AMANDA REED

SUBSCRIBED and SWORN to before me
this 9TH day of April, 2018.



Esther M. Garcia
NOTARY PUBLIC



1 **ORDR**

2 **HANRATTY LAW GROUP**

3 Carrie J. Primas, Esq.

4 State Bar of Nevada No. 12071

5 1815 Village Center Circle, Suite 140

6 Las Vegas, Nevada 89134

7 PH: (702) 821-1379

8 FAX: (702) 870-1846

9 EMAIL: attorneys@hanrattylawgroup.com

10 Attorneys for Defendant, Amanda Reed

11 **DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 DEVIN REED,

14 Plaintiff,

15 v.

16 AMANDA REED,

17 Defendant.

) Case No: D-18-568055-D

) Dept No: F

18 **ORDER AFTER HEARING**

19 Date of Hearing: October 16, 2018

20 Time of Hearing: 11:00 a.m.

21 This matter having come before this Court on the 16th day of October, 2018, for a Case
22 Management Conference and return hearing from FMC Mediation. Plaintiff, Devin Reed, being
23 present and represented by Louis C. Schneider, Esq., and Defendant, Amanda Reed, being present
24 and represented by Carrie J. Primas, Esq., of Hanratty Law Group, the Court hereby finds and
25 orders as follows:

26 THE COURT FINDS that the parties have reached an agreement and the agreement is to
27 clarify the terms of the temporary Order and convert them to permanent orders.

28 IT IS HEREBY STIPULATED AND ORDERED that the parental timeshare shall remain
status quo, specifically as follows: in Week One, Plaintiff will have the minor children from
Tuesday at school drop off, or 8:00 a.m. at the babysitter if there is no school, until Thursday at
school pick up, or 3:00 p.m. at the babysitter if there is no school, and in Week Two Plaintiff will
have the children from Friday at school drop off, or 8:00 a.m. at the babysitter if there is no
school, until Monday at school drop off, or 8:00 a.m. at the babysitter if there is no school. The
delivering parent shall transport and all exchanges shall take place at the babysitter or the minor

1 child's school. As to Shawn, until he is in school, all exchanges related to him shall occur at the
2 babysitter.

3 IT IS FURTHER STIPULATED AND ORDERED Plaintiff's ex-wife shall not watch or
4 transport the minor child. Devon's adult son, Daniel, shall be allowed to transport the minor
5 children.

6 IT IS FURTHER STIPULATED AND ORDERED that the parties shall follow and abide
7 by the previous holiday schedule implemented in the Partial Parenting Agreement, which is
8 attached to this Order as Exhibit A; however, this schedule does not address Christmas. As such,
9 Winter Break shall be divided as follows: Defendant shall have Christmas Day at 8:00 a.m. until
10 December 31st at 5:00 p.m. in even years, and Christmas day at 8:00 a.m. until January 1st at 5:00
11 p.m. in odd years. Plaintiff shall have the remainder of Winter Break.

12 IT IS FURTHER STIPULATED AND ORDERED that there shall be no right of first
13 refusal.

14 IT IS FURTHER STIPULATED AND ORDERED that the parties shall abide by the
15 Mutual Behavior Order filed on August 14, 2018, and said Order is extended to the minor
16 children's events and any third-party or family members of the parties.

17 IT IS FURTHER STIPULATED AND ORDERED that the parties shall be responsible for
18 transporting the minor children to all extracurricular activities during their parental timeshare.

19 IT IS FURTHER STIPULATED AND ORDERED that Plaintiff shall not smoke in the
20 car or house during his parental timeshare.

21 IT IS FURTHER STIPULATED AND ORDERED that Defendant shall have two weeks
22 to return the marital dog, Chiba, to Plaintiff; however, if the Defendant has not taken holiday
23 pictures with the dog and children by that time; the minor children shall be allowed to take the
24 dog during their visitation with Defendant for family pictures and return the dog to Plaintiff.

25 IT IS FURTHER STIPULATED AND ORDERED that Plaintiff shall continue to
26 maintain the truck payment. Plaintiff shall be responsible for car insurance. Defendant shall be
27

1 responsible for the cell phone.

2 IT IS FURTHER STIPULATED AND ORDERED that Plaintiff's child support
3 obligation shall be waived until he establishes employment.

4 IT IS FURTHER STIPULATED AND ORDERED that Defendant shall have temporary
5 exclusive possession of the marital residence; however, Plaintiff is not waiving any rights or
6 interest to the equity in the residence. Counsel will discuss regarding the appraisal of the marital
7 residence.

8 IT IS FURTHER ORDERED that the foregoing agreement is affirmed and adopted by this
9 Court.

10 IT IS FURTHER ORDERED that the Case Management Conference shall be continued to
11 December 18, 2018 at 11:00 a.m.

12 IT IS FURTHER ORDERED that Attorney Primas shall prepare the Order from today's
13 hearing and Attorney Schneider to countersign.

14 IT IS FURTHER ORDERED AND THE PARTIES ARE PUT ON NOTICE that they are
15 subject to the requirements of NRS 125C.0045(6) and NRS 125C.0045(7.)

16 **PENALTY FOR VIOLATION OF ORDER:** THE ABDUCTION, CONCEALMENT
17 OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A
18 CATEGORY D FELONY AS PROVIDED IN NRS 193.190. NRS 200.359 provides that every
19 person having a limited right of custody to a child or any parent having no right of custody to the
20 child who willfully detains, conceals or removes the child from a parent, guardian or other person
21 having lawful custody or a right of visitation of the child in violation of an order of this court, or
22 removes the child from jurisdiction of the court without the consent of either the court or all
23 persons who have the right to custody or visitation is subject to being punished for a category D
24 felony as provided in NRS 193.130.

25 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of October 25,
26 1980, adopted by the 14th Session of the Hague Conference on Private International Law apply if
27

1 a parent abducts or wrongfully retains a child in a foreign country. The minor children are
2 habitual residents of Clark County, Nevada.

3 The parties are also placed on notice of the following provisions in NRS 125C.0045(8):

4 If a parent of the child lives in a foreign country or has significant commitments in a
5 foreign country:

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

9 (b) Upon motion of one of the parties, the court may order the parent to post a bond if
10 the court determines that the parent poses an imminent risk of wrongfully removing or concealing
11 the child outside the country of habitual residence. The bond must be in an amount determined by
12 the court and may be used only to pay for the cost of locating the child and returning the child to
13 his or her habitual residence if the child is wrongfully removed from or concealed outside the
14 country of habitual residence. The fact that a parent has significant commitments in a foreign
15 country does not create a presumption that the parent poses an imminent risk of wrongfully
16 removing or concealing the child.

17 The parties are also placed on notice of the following provisions in NRS 125C.006:

18 1. If primary physical custody has been established pursuant to an order, judgment or
19 decree of a court and the custodial parent intends to relocate his or her residence to a place
20 outside of this State or to a place within this State that is at such a distance that would
21 substantially impair the ability of the other parent to maintain a meaningful relationship with the
22 child, and the custodial parent desires to take the child with him or her, the custodial parent shall,
23 before relocating:

24 (a) Attempt to obtain the written consent of the noncustodial parent to relocate with
25 the child; and
26

1 (b) If the noncustodial parent refuses to give that consent, petition the court for
2 permission to relocate with the child;

3 2. The court may award reasonable attorney's fees and costs to the relocating parent if the
4 court finds that the noncustodial parent refused to consent to the relocating parent's relocation
5 with the child:

6 (a) Without having reasonable grounds for such refusal; or

7 (b) For the purposes of harassing the custodial parent.

8 3. A parent who relocates with a child pursuant to this section without the written consent
9 of the noncustodial parent or the permission of the court is subject to the provisions of NRS
10 200.359.

11 This provision does not apply to vacations outside Nevada or North Carolina planned by
12 either party.

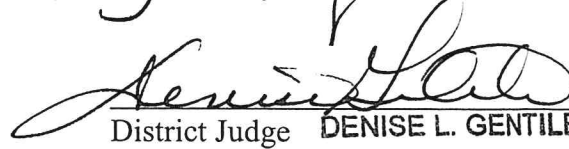
13 The parties, and each of them, are hereby placed on notice that in the event either party is
14 ordered to pay child support to the other, that, pursuant to NRS 125.007, a parent responsible for
15 paying child support is subject to NRS 31A.010 through NRS 31A.340, inclusive, and Sections 2
16 and 3 of Chapter 31A of the Nevada Revised Statutes, regarding the withholding of wages and
17 commissions for the delinquent payment of support, that these statutes and provisions require
18 that, if a parent responsible for paying child support is delinquent in paying the support of a child
19 that such person has been ordered to pay, then that person's wages or commissions shall
20 immediately be subject to wage assignment and garnishment, pursuant to the provisions of the
21 above-referenced statutes.

22 The parties acknowledge, pursuant to NRS 125B.145 , that an Order for the support of a
23 child must, upon the filing of a request for review by:

24 (a) The welfare division of the department of human resources, its designated
25 representative or the district attorney, if the welfare division or the district attorney has
26 jurisdiction in the case; or,

1 (b) A parent or legal guardian of the child,
2 be reviewed by the Court at least every 3 years pursuant to this section to determine
3 whether the Order should be modified or adjusted. Further, if either of the parties is subject to an
4 Order of child support, that party may request a review pursuant the terms of NRS 125B.145. An
5 Order for the support of a child may be reviewed at any time on the basis of changed
6 circumstances.

7 IT IS SO ORDERED on this 25th day of February, 2018.

8 
9 District Judge DENISE L. GENTILE (CH)

10 Respectfully submitted on this 19th
11 day of November, 2018.

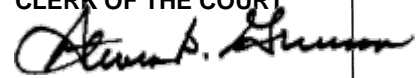
12 February, 2019
13 HANRATTY LAW GROUP

Approved as to form and content on this 19th
day of November, 2018.

1 LOUIS C. SCHNEIDER,
ATTORNEY AT LAW

14 By: Carrie J. Primas
15 Carrie J. Primas, Esq.
16 Nevada Bar No. 12071
17 1815 Village Center Circle, Suite 140
18 Las Vegas, Nevada 89134
19 Phone: (702) 821-1379
20 Fax: (702) 870-1846
21 Email: cprimas@hanrattylawgroup.com
22 Attorney for Defendant, Amanda Reed

By: Louis C. Schneider
Louis C. Schneider, Esq.
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430 South 7th Street
Las Vegas, Nevada 89101
Phone: (702) 435-2121
Fax: (702) 431-3807
Email: lcsllawllc@gmail.com
Attorney for Plaintiff, Devin Reed



**NEOJ
HANRATTY LAW GROUP**

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FAX: (702) 870-1846
EMAIL: attorneys@hanrattylawgroup.com
Attorneys for Defendant, Amanda Reed

**DISTRICT COURT
CLARK COUNTY, NEVADA**

DEVIN REED,
Plaintiff,

v.

AMANDA REED,
Defendant.

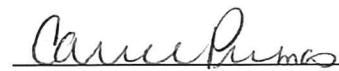
Case No: D-18-568055-D
Dept No: F

**NOTICE OF ENTRY OF ORDER
AFTER HEARING**

PLEASE TAKE NOTICE that the ORDER AFTER HEARING, a true and correct copy of which is hereto, was entered in the above-entitled matter on the 27th day of February, 2019.

Dated this 28th day of February, 2019.

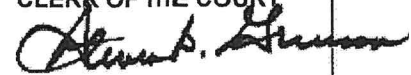
HANRATTY LAW GROUP


Carrie J. Primas, Esq.
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Las Vegas, Nevada 89134
Phone: (702) 821-1379
Fax: (702) 870-1846
Email: attorneys@hanrattylawgroup.com
Attorneys for Defendant, Amanda Reed

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Louis C. Schneider, Esq.
430 South 7th Street
Las Vegas, Nevada 89101
Attorney for Plaintiff

2



ORDR
HANRATTY LAW GROUP
Carrie J. Primas, Esq.
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Las Vegas, Nevada 89134
PH: (702) 821-1379
FAX: (702) 870-1846
EMAIL: attorneys@hanrattylawgroup.com
Attorneys for Defendant, Amanda Reed

DISTRICT COURT
CLARK COUNTY, NEVADA

DEVIN REED,
Plaintiff,

v.

AMANDA REED,
Defendant.

) Case No: D-18-568055-D
) Dept No: F

ORDER AFTER HEARING

Date of Hearing: October 16, 2018
Time of Hearing: 11:00 a.m.

This matter having come before this Court on the 16th day of October, 2018, for a Case Management Conference and return hearing from FMC Mediation. Plaintiff, Devin Reed, being present and represented by Louis C. Schneider, Esq., and Defendant, Amanda Reed, being present and represented by Carrie J. Primas, Esq., of Hanratty Law Group, the Court hereby finds and orders as follows:

THE COURT FINDS that the parties have reached an agreement and the agreement is to clarify the terms of the temporary Order and convert them to permanent orders.

IT IS HEREBY STIPULATED AND ORDERED that the parental timeshare shall remain status quo, specifically as follows: in Week One, Plaintiff will have the minor children from Tuesday at school drop off, or 8:00 a.m. at the babysitter if there is no school, until Thursday at school pick up, or 3:00 p.m. at the babysitter if there is no school, and in Week Two Plaintiff will have the children from Friday at school drop off, or 8:00 a.m. at the babysitter if there is no school, until Monday at school drop off, or 8:00 a.m. at the babysitter if there is no school. The delivering parent shall transport and all exchanges shall take place at the babysitter or the minor

1 child's school. As to Shawn, until he is in school, all exchanges related to him shall occur at the
2 babysitter.

3 IT IS FURTHER STIPULATED AND ORDERED Plaintiff's ex-wife shall not watch or
4 transport the minor child. Devon's adult son, Daniel, shall be allowed to transport the minor
5 children.

6 IT IS FURTHER STIPULATED AND ORDERED that the parties shall follow and abide
7 by the previous holiday schedule implemented in the Partial Parenting Agreement, which is
8 attached to this Order as Exhibit A; however, this schedule does not address Christmas. As such,
9 Winter Break shall be divided as follows: Defendant shall have Christmas Day at 8:00 a.m. until
10 December 31st at 5:00 p.m. in even years, and Christmas day at 8:00 a.m. until January 1st at 5:00
11 p.m. in odd years. Plaintiff shall have the remainder of Winter Break.

12 IT IS FURTHER STIPULATED AND ORDERED that there shall be no right of first
13 refusal.

14 IT IS FURTHER STIPULATED AND ORDERED that the parties shall abide by the
15 Mutual Behavior Order filed on August 14, 2018, and said Order is extended to the minor
16 children's events and any third-party or family members of the parties.

17 IT IS FURTHER STIPULATED AND ORDERED that the parties shall be responsible for
18 transporting the minor children to all extracurricular activities during their parental timeshare.

19 IT IS FURTHER STIPULATED AND ORDERED that Plaintiff shall not smoke in the
20 car or house during his parental timeshare.

21 IT IS FURTHER STIPULATED AND ORDERED that Defendant shall have two weeks
22 to return the marital dog, Chiba, to Plaintiff; however, if the Defendant has not taken holiday
23 pictures with the dog and children by that time; the minor children shall be allowed to take the
24 dog during their visitation with Defendant for family pictures and return the dog to Plaintiff.

25 IT IS FURTHER STIPULATED AND ORDERED that Plaintiff shall continue to
26 maintain the truck payment. Plaintiff shall be responsible for car insurance. Defendant shall be
27

1 responsible for the cell phone.

2 IT IS FURTHER STIPULATED AND ORDERED that Plaintiff's child support
3 obligation shall be waived until he establishes employment.

4 IT IS FURTHER STIPULATED AND ORDERED that Defendant shall have temporary
5 exclusive possession of the marital residence; however, Plaintiff is not waiving any rights or
6 interest to the equity in the residence. Counsel will discuss regarding the appraisal of the marital
7 residence.

8 IT IS FURTHER ORDERED that the foregoing agreement is affirmed and adopted by this
9 Court.

10 IT IS FURTHER ORDERED that the Case Management Conference shall be continued to
11 December 18, 2018 at 11:00 a.m.

12 IT IS FURTHER ORDERED that Attorney Primas shall prepare the Order from today's
13 hearing and Attorney Schneider to countersign.

14 IT IS FURTHER ORDERED AND THE PARTIES ARE PUT ON NOTICE that they are
15 subject to the requirements of NRS 125C.0045(6) and NRS 125C.0045(7.)

16 **PENALTY FOR VIOLATION OF ORDER:** THE ABDUCTION, CONCEALMENT
17 OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A
18 CATEGORY D FELONY AS PROVIDED IN NRS 193.190. NRS 200.359 provides that every
19 person having a limited right of custody to a child or any parent having no right of custody to the
20 child who willfully detains, conceals or removes the child from a parent, guardian or other person
21 having lawful custody or a right of visitation of the child in violation of an order of this court, or
22 removes the child from jurisdiction of the court without the consent of either the court or all
23 persons who have the right to custody or visitation is subject to being punished for a category D
24 felony as provided in NRS 193.130.

25 NOTICE IS HEREBY GIVEN that the terms of the Hague Convention of October 25,
26 1980, adopted by the 14th Session of the Hague Conference on Private International Law apply if
27

1 a parent abducts or wrongfully retains a child in a foreign country. The minor children are
2 habitual residents of Clark County, Nevada.

3 The parties are also placed on notice of the following provisions in NRS 125C.0045(8):

4 If a parent of the child lives in a foreign country or has significant commitments in a
5 foreign country:

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

9 (b) Upon motion of one of the parties, the court may order the parent to post a bond if
10 the court determines that the parent poses an imminent risk of wrongfully removing or concealing
11 the child outside the country of habitual residence. The bond must be in an amount determined by
12 the court and may be used only to pay for the cost of locating the child and returning the child to
13 his or her habitual residence if the child is wrongfully removed from or concealed outside the
14 country of habitual residence. The fact that a parent has significant commitments in a foreign
15 country does not create a presumption that the parent poses an imminent risk of wrongfully
16 removing or concealing the child.

17 The parties are also placed on notice of the following provisions in NRS 125C.006:

18 1. If primary physical custody has been established pursuant to an order, judgment or
19 decree of a court and the custodial parent intends to relocate his or her residence to a place
20 outside of this State or to a place within this State that is at such a distance that would
21 substantially impair the ability of the other parent to maintain a meaningful relationship with the
22 child, and the custodial parent desires to take the child with him or her, the custodial parent shall,
23 before relocating:

24 (a) Attempt to obtain the written consent of the noncustodial parent to relocate with
25 the child; and
26

1 (b) If the noncustodial parent refuses to give that consent, petition the court for
2 permission to relocate with the child;

3 2. The court may award reasonable attorney's fees and costs to the relocating parent if the
4 court finds that the noncustodial parent refused to consent to the relocating parent's relocation
5 with the child:

6 (a) Without having reasonable grounds for such refusal; or

7 (b) For the purposes of harassing the custodial parent.

8 3. A parent who relocates with a child pursuant to this section without the written consent
9 of the noncustodial parent or the permission of the court is subject to the provisions of NRS
10 200.359.

11 This provision does not apply to vacations outside Nevada or North Carolina planned by
12 either party.

13 The parties, and each of them, are hereby placed on notice that in the event either party is
14 ordered to pay child support to the other, that, pursuant to NRS 125.007, a parent responsible for
15 paying child support is subject to NRS 31A.010 through NRS 31A.340, inclusive, and Sections 2
16 and 3 of Chapter 31A of the Nevada Revised Statutes, regarding the withholding of wages and
17 commissions for the delinquent payment of support, that these statutes and provisions require
18 that, if a parent responsible for paying child support is delinquent in paying the support of a child
19 that such person has been ordered to pay, then that person's wages or commissions shall
20 immediately be subject to wage assignment and garnishment, pursuant to the provisions of the
21 above-referenced statutes.

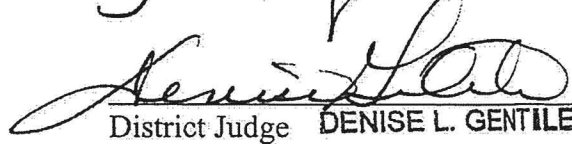
22 The parties acknowledge, pursuant to NRS 125B.145 , that an Order for the support of a
23 child must, upon the filing of a request for review by:

24 (a) The welfare division of the department of human resources, its designated
25 representative or the district attorney, if the welfare division or the district attorney has
26 jurisdiction in the case; or,
27

1 (b) A parent or legal guardian of the child,

2 be reviewed by the Court at least every 3 years pursuant to this section to determine
3 whether the Order should be modified or adjusted. Further, if either of the parties is subject to an
4 Order of child support, that party may request a review pursuant the terms of NRS 125B.145. An
5 Order for the support of a child may be reviewed at any time on the basis of changed
6 circumstances.

7 IT IS SO ORDERED on this 25th day of February, 2018.

8 
9 District Judge DENISE L. GENTILE (clt)

10 Respectfully submitted on this 19th
11 day of November, ~~2018~~.

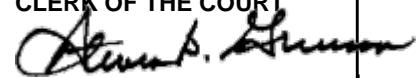
12 February, 2019
13 HANRATTY LAW GROUP

Approved as to form and content on this 19th
day of November, 2018.

1 LOUIS C. SCHNEIDER,
ATTORNEY AT LAW

14 By: Carrie J. Primas
15 Carrie J. Primas, Esq.
16 Nevada Bar No. 12071
17 1815 Village Center Circle, Suite 140
18 Las Vegas, Nevada 89134
19 Phone: (702) 821-1379
20 Fax: (702) 870-1846
21 Email: cprimas@hanrattylawgroup.com
22 Attorney for Defendant, Amanda Reed

By: Louis C. Schneider
Louis C. Schneider, Esq.
Nevada Bar No. 9683
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Las Vegas, Nevada 89101
Phone: (702) 435-2121
Fax: (702) 431-3807
Email: lcsllawllc@gmail.com
Attorney for Plaintiff, Devin Reed



1 **LOUIS C. SCHNEIDER, ESQ.**
2 Nevada Bar Number: 009683
3 430 South 7th Street
4 Las Vegas, Nevada 89101
5 Ph: 702-435-2121
6 Fax: 702-431-3807
7 lcslawllc@gmail.com
8 Attorney for the Plaintiff

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

9 DEVIN REED,)
10)
11 Plaintiff,)
12)
13 vs.)
14)
15 AMANDA REED,)
16)
17 Defendant.)
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

Case Number: D-18-568055-D
Department: F

13 **ORDER FROM MARCH 20, 2019 HEARING**

14 **THIS MATTER** having come on for hearing on March 20, 2019 for Plaintiff's Motions and
15 Defendant's Oppositions and Countermotions filed herein and set for a review by the Court and the
16 Plaintiff, DEVIN REED, appearing personally and together with his attorney of record, LOUIS C.
17 SCHNEIDER, ESQ., and the Defendant, AMANDA REED, appearing personally and together with
18 her attorney of record and the Court having reviewed all of the pleadings and papers herein and
19 hearing argument of both Counsel and testimony of the parties, the Court hereby finds and orders the
20 following:

21 **THE COURT HEREBY FINDS** that this matter has been pending since March 20, 2018.

22 **THE COURT FURTHER FINDS** that the parties previously stipulated to a custody schedule
23 to resolve the issue of custody.

24 **THE COURT FURTHER FINDS** that Defendant sought for this Court to re-open the issue
25 of custody and to allow a custody evaluation to be conducted, even though the parties agreed to a
26 custody schedule and made it a final order of the Court.
27
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1 **THE COURT FURTHER FINDS** that a custody evaluation was sought due to medical
2 concerns raised by Defendant, and claims that Plaintiff fails to properly address medical issues and
3 further claims that the issues are caused by Plaintiff even though the child and child's medical history
4 dictates that the medical issues are potentially chronic.

5 **THE COURT FURTHER FINDS** that while there are concerns that Plaintiff may not
6 address the issues in the same manner as Defendant, the Court does not *find* there is a basis to conduct
7 a custody evaluation or a trial on custody.

8 **THE COURT FURTHER FINDS** that the issue of Plaintiff's employment was addressed
9 and whether he is actively seeking employment or choosing not to pursue gainful employment thus
10 failing to support his family.

11 **THE COURT FURTHER FINDS** that the Court reviewed Plaintiff's drug tests, which were
12 negative, contrary to the claims of Defendant.

13 **THE COURT FURTHER FINDS** that the Court reviewed the CPS records, which did not
14 indicate there was any substantiated issue with either parent.

15 **NOW THEREFORE**, the Court issues the following **ORDERS**:

16 **IT IS HEREBY ORDERED** that the parties shall continue to adhere to their agreed upon
17 custody schedule

18 **IT IS FURTHER ORDERED** that the Defendant's requests are **DENIED**.

19 **IT IS FURTHER ORDERED** that the Plaintiff's requests, which was already addressed at
20 the hearing, is also **DENIED**.

21 **IT IS FURTHER ORDERED** that child support and all other financial issues shall be
22 addressed at the time of trial, in the event the parties have not resolved the matter amicably.

23 **IT IS FURTHER ORDERED** that COURT ORDERS that the parties shall conclude
24 discovery on or before June 11, 2019.

25 **IT IS FURTHER ORDERED** that a Pre-trial Conference is hereby scheduled for June 11,
26 2019 at 1:30 p.m.

27 **IT IS FURTHER ORDERED** that Parties shall be prepared to submit their Pre-trial
28 Memoranda and proceed to trial within 30 days of the date of the Pre-Trial Conference.

LOUIS C. SCHNEIDER, LLC.
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-430-2121

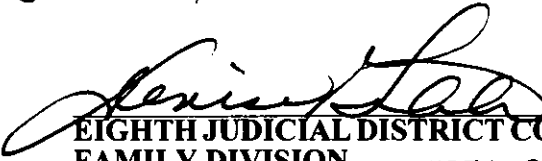
1 **IT IS FURTHER ORDERED** that in the event the parties desire to conduct a Senior Judge
2 or Judicial Settlement Conference, they shall submit a stipulation to the Court or contact the JEA, and
3 the Court will make its best efforts to schedule a conference prior to a trial in this matter.

4 **IT IS FURTHER ORDERED** that the parties are encouraged to attempt resolution on their
5 own accord, either between counsel, or with a private mediator.

6 **IT IS FURTHER ORDERED** that the status hearing on this Court's Chambers calendar is
7 hereby VACATED.

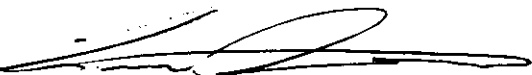
8 **IT IS FURTHER ORDERED** that Plaintiff's counsel shall prepare the Order consistent with
9 this Minute Order.


10 **IT IS SO ORDERED** on this 28th day of May, 2019.

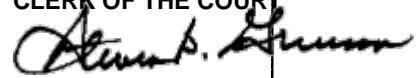
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12 
13 **EIGHTH JUDICIAL DISTRICT COURT JUDGE**
FAMILY DIVISION DENISE L. GENTILE (9)

14 Respectfully submitted by:

Approved as to form and content:

15
16 
17 **LOUIS C. SCHNEIDER, ESQ.**
18 Nevada Bar Number: 009683
19 430 South 7th Street
20 Las Vegas, Nevada 89101
21 Phone: 702-435-2121
22 Attorney for the Plaintiff

23
24 
25 **CARRIE J. PRIMAS, ESQ.**
26 Nevada Bar Number: 12071
27 1815 Village Center Circle, Ste. 140
28 Las Vegas, Nevada 89134
Phone: 702-821-1379
Attorney for Defendant



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lcslawllc@yahoo.com
Attorney for Plaintiff

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

DEVIN REED,

Plaintiff,

vs.

AMANDA REED,

Defendant,

Case No.: D-18-568055-D

Dept. No.: F

**NOTICE OF ENTRY OF
ORDER**

TO ALL INTERESTED PARTIES and their legal counsel, If applicable:

PLEASE TAKE NOTICE that the Order from March 20, 2019, hearing was entered on May 29, 2019; a true and correct copy is attached hereto.

Dated this 10th day of June, 2019.

/s/ Louis C. Schneider, Esq.
LOUIS C. SCHNEIDER, ESQ.
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430 S. 7th St.
Las Vegas, NV 89101
(702) 435-2121
lcslawllc@yahoo.com

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Louis C. Schneider, Esq. and that on the 10th day of June, 2019, I served a true and correct copy of the above and forgoing **NOTICE OF ENTRY OF ORDER** on the parties addressed as shown below:

 X Via Electronic Service [NEFR Rule 9]

 Via facsimile [EDCR 7.26(a)]

 Via U.S. Mail (NRCP 5(b))

 Hand Delivered

HANRATTY LAW GROUP
Carrie J. Primas, Esq.
1815 Village Center Circle, Suite 140
Las Vegas, Nevada 89134

 /s/ Stacie Comerio
An Employee of Louis C. Schneider, Esq.



1 **LOUIS C. SCHNEIDER, ESQ.**
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7 lcsllawllc@gmail.com
8 Attorney for the Plaintiff

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

9 **DEVIN REED,**

10 Plaintiff,

11 vs.

12 **AMANDA REED,**

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Case Number:
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EIGHTH JUDICIAL DISTRICT COURT JUDGE
FAMILY DIVISION DENISE L. GENTILE 

Respectfully submitted by:

Approved as to form and content:

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430 South 7th Street
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Phone: 702-435-2121
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 Attorney for Defendant