

1                   **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2

3           RAJWANT KAUR,

4                           Appellant / Cross-Respondent

5           vs.

6           JASWINDER SINGH,

7                           Respondent / Cross-Appellant

No.: 80090           Electronically Filed  
Jul 17 2020 06:05 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**RESPONDENT'S REPLY**

**APPENDIX**

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9   Clerk’s Exhibit List ..... 1

10   Deposition of Rajwant Kaur ..... 5

CASE NO. 04D323977

DEPT. P

Jaswinder Singh

PLAINTIFF

Vs

Rajwant Kaur

DEFENDANT,

TRIAL DATE: SEP 12 2019 / SEP 13 2019

JUDGE: SANDRA POMRENZE

CLERK: CAROL CRITCHETT

REPORTER: VIDEO

F. Peter James  
COUNSEL FOR PLAINTIFF

Andrew Kynaston  
COUNSEL FOR DEFENDANT

**TRIAL BEFORE THE COURT**

**PLAINTIFF'S WITNESSES:**

- |          |           |
|----------|-----------|
| 1. _____ | 7. _____  |
| 2. _____ | 8. _____  |
| 3. _____ | 9. _____  |
| 4. _____ | 10. _____ |
| 5. _____ | 11. _____ |
| 6. _____ | 12. _____ |

**DEFENDANT'S WITNESSES:**

- |                           |                                   |           |
|---------------------------|-----------------------------------|-----------|
| 1. <u>Jaswinder Singh</u> | <u>1:39:30</u><br><u>9-12-19</u>  | 7. _____  |
| 2. <u>Jaswinder Singh</u> | <u>9:42:57</u><br><u>9-13-19</u>  | 8. _____  |
| 3. <u>Rajwant Kaur</u>    | <u>09:30:00</u><br><u>9-13-19</u> | 9. _____  |
| 4. _____                  |                                   | 10. _____ |
| 5. _____                  |                                   | 11. _____ |
| 6. _____                  |                                   | 12. _____ |

**REBUTTAL WITNESSES:**

- |          |          |
|----------|----------|
| 1. _____ | 1. _____ |
| 2. _____ | 2. _____ |

**SUR-REBUTTAL WITNESSES:**

04D323977

**Jaswinder Singh vs. Rajwant Kaur 04323977**

**PLAINTIFF'S TRIAL EXHIBITS**

**TRIAL DATE: 9/12 & 9/13**

Exhibit	Description	Objected	Offered	Accepted <span style="float: right;">admitted</span>
✓1	Executed release for employment records	no	Stipulated 9-12-19 ✓	9-12-19 ✓
✓2	Letter from Bank of America regarding records being unavailable	no	Stipulated 9-12-19 ✓	9-12-19 ✓
✗	Grant Bargain Sale Deed in the name of Balbinder Singh Pabla for Nevada property			
✓4	Payment receipts for the Law Office of F. Peter James, Esq. dated 1/16/19 and 2/26/19	no	Stipulated 9-12-19 ✓	9-12-19 ✓
✓5	Invoice # 2621, 2588, and 2606 from the Law Office of F. Peter James, Esq. (redacted)	no	Stipulated 9-12-19 ✓	9-12-19 ✓
✗	Invoices from Constance Bessada, Esq. dated 6/13/18, 8/21/18, and 1/3/19 (redacted)			
✓7	Retainer Agreement for Law Offices of F. Peter James, Esq.	no	Stipulated 9-12-19 ✓	9-12-19 ✓
✗	Retainer Agreement for Constance Bessada, Esq.			
✗	Passport of Jaswinder Singh			
✓10	Documents disclosed by Defendant's counsel at the August 19, 2019 deposition	no	Stipulated 9-12-19 ✓	9-12-19 ✓
✓11	India Marriage Certificate Jasvir Singh Dhaliwal and Rajwant Kaur	yes	✓ 9-13-19	no
✗	India Divorce Ruling			
✓13	Defendant's Deposition Transcript	no	Stipulated 9-12-19 ✓	9-12-19 ✓
✓14	Plaintiff's Interrogatories to Defendant	↑		
✓15	Defendant's responses to the Interrogatories	no	Stipulated 9-12-19 ✓	9-12-19 ✓
✗	Plaintiff's Requests for Production of Documents to Defendant			
✗	Defendant's responses to Requests for Production of Documents			

Jaswinder Singh v. Rajwant Kaur  
CASE NO. 04D323977

DEFENDANT'S EXHIBITS		OFFERED	ADMITTED	Objected
✓A	Decree of Divorce, filed September 8, 2004 in Clark County [DEF018 - DEF020]	Stipulated ✓9-12-19	Stipulated 9-12-19 ✓	NO
✓B	Joint Petition for Summary Decree of Divorce, filed August 27, 2004 in Clark County [DEF013 - DEF017]	↑	↑	
✓C	Affidavit of Resident Witness, filed August 27, 2004 in Clark County [DEF021 - DEF022]	↑	↑	
✓D	Petition for Dissolution of Marriage, filed May 7, 2018 in Los Angeles County [DEF001 - DEF003]	↑	↑	
✓E	Plaintiff's Response and Request for Dissolution of Marriage [DEF004 - DEF006]	↑	↑	
✓F	Plaintiff's Amended Response to Petition [DEF010 - DEF012]	↓	↓	
✓G	Order from Hearing Held February 13, 2019, filed March 14, 2019 in Clark County	Stipulated ✓9-12-19	Stipulated 9-12-19 ✓	NO
<del>X</del>	Minutes from Hearing Held February 13, 2019			
✓I	Plaintiff's Response to Defendant's First Set of Interrogatories to Plaintiff, e-served May 13, 2019	Stipulated ✓9-12-19	Stipulated 9-12-19 ✓	NO
✓J	Plaintiff's Response to Defendant's First Request for Production of Documents to Plaintiff, e-served May 13, 2019]	↑	↑	
✓K	Copy of Plaintiff's Costco Membership Card [DEF0065]	↑	↑	
✓L	Copy of Defendant's Costco Membership Card [DEF0067]	↑	↑	
✓M	Costco Receipt showing that Store No. 48 is located in Van Nuys, CA [DEF0066]]	↓	↓	
✓N	Copy of Costco Membership Activity for card ending in 50001, from January 3, 2004 through December 19, 2004 [DEF0371 - DEF0376_3]	Stipulated ✓9-12-19	Stipulated 9-12-19 ✓	NO

Jaswinder Singh v. Rajwant Kaur  
CASE NO. 04D323977

DEFENDANT'S EXHIBITS		OFFERED	ADMITTED	objected
✓O	Contention Interrogatories Set No. One from California case no. 18STFL05676 [DEF0379 - DEF0386_3]	Stipulated ✓ 9-12-19	Stipulated 9-12-19 ✓	NO
✓P	Plaintiff's Response to Contention Interrogatories Set No. One, from California case no. 18STFL05676 [DEF0387 - DEF0390_3]			
✓Q	Sales Deed showing listing property to Jaswinder Singh as a married man [DEF0024]			
✓R	Experian and TransUnion Credit Report in the name of Rajwant Kaur, showing Jaswinder as spouse or co-applicant [DEF0025 - DEF0043]			
✓S	Aftercare instruction from Gastroenterology Department for Jaswinder Singh, signed by "Accompanying Adult" Rajwant Kaur, Wife [DEF0044]	Stipulated ✓ 9-12-19	Stipulated 9-12-19 ✓	NO
✗	Verification of employment letter from Defendant's employer dated August 21, 2019 [DEF0377_3]			
✗	Letter from SoCal Gas regarding service dates at the Sepulveda Apartment [DEF0064]			
✓V	Interinsurance Exchange of the Automobile Club Renewal Declarations from July 2004 [DEF0362 - DEF0364_2]	Stipulated ✓ 9-12-19	Stipulated 9-12-19 ✓	NO
✓W	Interinsurance Exchange of the Automobile Club Truth in Lending Information Billing Statement for Automobile Policy from July 2004 [DEF0365 - DEF0366_2]			
✓X	Plaintiff's Deposition Transcript			
✓Y	Defendant's Deposition Transcript	Stipulated ✓ 9-12-19	Stipulated 9-12-19 ✓	NO

**DISTRICT COURT, FAMILY DIVISION**

**CLARK COUNTY, NEVADA**

JASWINDER SINGH, )  
 )  
Plaintiff, )  
 )  
vs. ) No. 04D323977  
 ) Dept. No. P  
RAJWANT KAUR, )  
 )  
Defendant. )  
----- )

**DEPOSITION OF RAJWANT KAUR**

Taken on Monday, August 19, 2019  
By a Certified Court Reporter  
At 9:12 a.m.  
At Kainen Law Group  
3303 Novat Street  
Suite 200  
Las Vegas, Nevada

Reported By: Cindy Huebner, CCR 806

MARK IDENT EXHIB CASE #

PLAINTIFF'S EXHIBIT 13

9-12-7

040333977

PENGAD 800-631-6889

SED 7

1     **APPEARANCES :**

2  
3     For the Plaintiffs:

4                     **F. PETER JAMES, ESQ.**

5                     Law Offices of F. Peter James, Esq.  
6                     3821 West Charleston Boulevard  
7                     Suite 250  
8                     Las Vegas, NV 89102

9     For the Defendants:

10                    **ANDREW L. KYNASTON, ESQ.**

11                    Kainen Law Group  
12                    3303 Novat Street  
13                    Suite 200  
14                    Las Vegas, NV 89129

15     **ALSO PRESENT:**

16     MUNIR QURESHI, Punjabi interpreter  
17     JASWINDER SINGH  
18  
19  
20  
21  
22  
23  
24  
25



**INDEX OF EXAMINATIONS**

EXAMINATIONS	PAGE
BY MR. JAMES	4

**INDEX OF EXHIBITS**

(Exhibits attached as PDF bookmark.)

NO.	DESCRIPTION	PAGE
<u>Exhibit 1.</u>	Decree of Divorce, 9/8/04	11

**INFORMATION TO BE PROVIDED**

None

1 (Court reporter's opening statement waived.)

2 (Interpreter sworn.)

3 (Witness sworn.)

4 WHEREUPON:

5 RAJWANT KAUR

6 having been first duly sworn, was  
7 examined and testified as follows:

8

9 EXAMINATION

10 BY MR. JAMES:

11 Q. Please state your name.

12 A. Rajwant Kaur. R-A-J-W-A-N-T, K-A-U-R.

13 Q. Now, you do understand that your  
14 testimony is under oath?

15 A. Yes, I do understand.

16 Q. And this is the same oath that you  
17 would take if we were in a court of law in front  
18 of a judge.

19 A. Okay.

20 Q. And you have an interpreter here with  
21 you. So if you would please even if you  
22 understand what I am saying in English, because  
23 you have an interpreter, please use the  
24 interpreter for the questions and your answers.

25 A. Okay.

1 Q. Now, the court reporter is taking  
2 everything down for us today. Now, she is typing  
3 as well on her special typewriter that she uses,  
4 so the responses have to be verbal.

5 If you nod your head or shake your  
6 head, I will understand you and so will everyone  
7 else here in the room, but on the transcript, it  
8 won't translate very well.

9 A. Okay.

10 Q. So please wait until the interpreter is  
11 done with the translation of the question before  
12 you answer.

13 A. Okay.

14 Q. And I will wait for the translator to  
15 finish your response before I ask another  
16 question.

17 A. Okay.

18 Q. Now, if you don't understand one of my  
19 questions, please say so before you answer.

20 A. Okay.

21 Q. And if you do answer a question, I will  
22 assume that you understood the question.

23 A. Okay.

24 Q. Now, from time to time, you may want to  
25 take a break, and that's okay. I don't think we

1 will be here very long, so I don't think a break  
2 will be necessary.

3 A. Okay.

4 Q. However, if you choose to take a break,  
5 I reserve the right to finish my line of  
6 questioning before we take a break.

7 A. Okay.

8 Q. Now, from time to time, your attorney  
9 might object. If he is telling you not to  
10 answer, he will specifically say, "Do not  
11 answer," and then we will talk, the attorneys  
12 will talk to talk about that issue.

13 A. Okay.

14 Q. But if he objects and he does not tell  
15 you, "Do not answer," then you have to answer.

16 A. Okay.

17 Q. Now, I have to ask this question. Are  
18 you under the influence of any medication,  
19 alcohol, or drugs that would impair your ability  
20 to give your best testimony today?

21 A. No.

22 Q. How many times have you been married?

23 A. Just once.

24 Q. And to whom was that?

25 A. Jaswinder Singh.

1 Q. When was that?

2 A. 1989.

3 Q. And where were you married?

4 A. India.

5 Q. Now, when did you move to the United  
6 States?

7 A. In 1989.

8 Q. Now, why did you move to the United  
9 States?

10 A. My brother and -- the word is my  
11 brother had applied for me for a visa.

12 Q. And I imagine your husband came along  
13 with you?

14 A. I was not married at that time.

15 Q. So you moved to the United States and  
16 then you went back to India to marry?

17 A. Yes.

18 Q. And please use the interpreter because  
19 it will be too confusing if you don't.

20 A. Yes.

21 Q. Even though you might understand me in  
22 English, it's still necessary to use the  
23 translator.

24 A. Okay.

25 Q. So when did Mr. Singh move to the

1 United States?

2 A. He came in 1993.

3 Q. With you?

4 A. I had come by myself and he came  
5 afterwards.

6 Q. Do you have any children with  
7 Mr. Singh?

8 A. No, no children.

9 Q. Where did you live in the United  
10 States?

11 A. In California.

12 Q. In which city?

13 A. Missionary.

14 Q. Is that in Mission Hills?

15 A. Mission Hills.

16 Q. So now, do you know how much money you  
17 were worth when you married Mr. Singh?

18 INTERPRETER: Could you rephrase that  
19 question? How much what?

20 BY MR. JAMES:

21 Q. How much money in either the bank or  
22 assets that they had when they married.

23 A. I didn't work in the initial status and  
24 I had very little money.

25 Q. When you say you, do you mean you and

1 your husband or just you?

2 A. I alone had very little money. He came  
3 later.

4 Q. But my question was when you were  
5 married to him, how much money did you both have  
6 together?

7 A. I have no idea of his worth, but I had  
8 very little money.

9 Q. Are you claiming that -- strike that.  
10 I will get to that later.

11 When did you understand that Mr. Singh  
12 wanted a divorce?

13 A. I didn't know.

14 THE INTERPRETER: That is the answer.  
15 I am not adding or subtracting anything.

16 BY MR. JAMES:

17 Q. So when you signed the Decree of  
18 Divorce, you didn't know that Mr. Singh wanted a  
19 divorce?

20 A. No, I didn't.

21 THE INTERPRETER: Strange things  
22 happened.

23 MR. JAMES: If that's her answer.

24 BY MR. JAMES:

25 Q. Did you sign the Decree of Divorce?

1           A.     Yes, I did.

2           Q.     And where did you sign it, in what  
3 city?

4           A.     In Nevada.

5           Q.     Was anyone there with you when you  
6 signed?

7           A.     Jaswinder's father was there that day.

8           Q.     Was Jaswinder there?

9           A.     Yes.

10          Q.     Do you know who Balbinder Singh Pabla  
11 is?

12          A.     I don't know. Some friend of his.

13          Q.     Was he present when you signed the  
14 Decree of Divorce?

15          A.     Yes.

16          Q.     So we have Jaswinder, you, Jaswinder's  
17 father, and the Balbinder Singh Pabla. Was  
18 anyone else present?

19          A.     Those are the four people.

20          Q.     Did you sign this before a notary  
21 public?

22          A.     No.

23          Q.     I didn't have this marked as an  
24 exhibit, but I am showing the Decree of Divorce.  
25 I want you to take a look at it.



1 MR. KYNASTON: It looks like it's the  
2 decree, the affidavit of resident witness, the  
3 joint petition.

4 BY MR. JAMES:

5 Q. Did you sign a joint petition for a  
6 Decree of Divorce?

7 THE INTERPRETER: Joint petition, what  
8 does that mean?

9 MR. JAMES: That's the name of the  
10 document.

11 THE WITNESS: I don't remember.

12 BY MR. JAMES:

13 Q. I am going to mark this as Exhibit 1,  
14 and I will proffer that this is when we  
15 downloaded the Decree of Divorce, this is how it  
16 came out, with everything attached.

17 (Deposition Exhibit 1 marked.)

18 THE WITNESS: I haven't done it in  
19 front of a notary. I do recall that much.

20 BY MR. JAMES:

21 Q. But she signed this -- you signed this?  
22 I am still waiting for an answer.

23 A. That appears to be my signature, but I  
24 don't recall having signed it in front of a  
25 notary.

1 Q. But that is your signature?

2 A. Yes. Not in front of a notary.

3 Q. Do you claim that Jaswinder never lived  
4 in Nevada?

5 A. No.

6 Q. Do you claim that he never spent  
7 approximately six weeks living in Nevada?

8 A. Yes, I claim that.

9 Q. Do you claim that he did not spend six  
10 weeks in Nevada, living or not living, but six  
11 weeks in Nevada before the filing of the divorce?

12 INTERPRETER: Living or not living?  
13 With her?

14 MR. JAMES: No, no. I am trying to get  
15 around the question of he didn't actually move  
16 here. I am trying to get to the question that he  
17 was actually present in Nevada.

18 THE INTERPRETER: Got it.

19 THE WITNESS: No, he didn't spend six  
20 weeks here.

21 BY MR. JAMES:

22 Q. Do you have any documentary proof that  
23 Jaswinder actually was in California when he said  
24 he was in Nevada? And just so we have our time  
25 frames correct, the joint petition was filed on

1 August 27, 2004. In there, Mr. Singh claims that  
2 he lived in Nevada for at least six weeks prior  
3 to that date.

4 A. No.

5 Q. Now, you claim that Mr. Singh forced  
6 you to sign the divorce paperwork?

7 A. Yes, he did. His purpose was to bring  
8 his brother here.

9 Q. How did he threaten you?

10 A. He threatened to kill me.

11 Q. Any other ways?

12 A. No.

13 Q. How many times did he make that threat?

14 A. Besides that, he would force in other  
15 verbal ways, too.

16 Q. How so? But I want an answer to the  
17 first question first. How many times did he  
18 threaten to kill you?

19 A. Twice.

20 Q. Now, are you claiming that he  
21 threatened you in other ways?

22 A. He would call names.

23 Q. What kind of names?

24 A. Like a dog.

25 Q. Okay. How is that forcing you to sign

1 the decree?

2 A. In Indian culture, we have to abide by  
3 whatever our husband says, so I was supposed to  
4 sign the document.

5 Q. Based upon culture?

6 A. Yes.

7 Q. And that's why you signed?

8 A. Yes.

9 Q. Because of your cultural beliefs?

10 A. Yes.

11 Q. Do you have any documentary proof of  
12 the threats you say that Mr. Singh made?

13 A. No, I don't have any paper for that.

14 Q. Did you ever go to the doctor because  
15 of any harm that Mr. Singh may have caused you?

16 A. No.

17 Q. Did you ever report Mr. Singh to any  
18 authorities, the police, anyone?

19 A. No.

20 Q. Now, you were aware that in 2004, you  
21 received a Decree of Divorce from Mr. Singh?

22 A. Yes, I am.

23 Q. After the divorce was filed on  
24 September 8, 2004, did you marry someone else?

25 A. I married his brother in India.

1 Q. What date was that?

2 A. In November of 2004.

3 Q. And where was the divorce? Was it in  
4 California, in India? Where was the divorce  
5 filed from the brother?

6 A. In India.

7 Q. Your testimony is you did receive a  
8 divorce from Jaswinder's brother?

9 A. Yes.

10 Q. And what is Jaswinder's brother's name?

11 A. Jasweer Singh.

12 Q. Can you spell that?

13 INTERPRETER: J-A-S-W-E-E-R, last name  
14 S-I-N-G-H.

15 BY MR. JAMES:

16 Q. Now, did Jaswinder's brother after you  
17 married ever move to the United States?

18 A. No, he didn't.

19 Q. How long were you married to  
20 Jaswinder's brother?

21 A. We divorced in 2008.

22 Q. And when was the marriage again?

23 A. In November of 2004.

24 Q. Why did Jaswinder's brother, if you  
25 know, not move to the United States?

1           A.     I have no idea why he didn't move.  
2     Probably a visa was applied for him but he  
3     didn't.

4           Q.     Do you know for sure that he applied  
5     for a visa or are you guessing?

6           A.     I know it for sure.

7           Q.     Do you know if it was granted?

8           A.     I don't know. Perhaps he didn't get  
9     it.

10          Q.     After you divorced Jaswinder's brother,  
11     did you re-marry after that?

12          A.     No.

13          Q.     To your knowledge after you divorced  
14     Jaswinder in 2004, did he ever re-marry?

15          A.     No, he didn't marry.

16          Q.     Why did you file for a divorce in  
17     California from Jaswinder?

18          A.     I was living in California. I had to  
19     file over there.

20          Q.     But you were already divorced from  
21     Jaswinder.

22          A.     I don't know about that. We were  
23     living together in the same house.

24          Q.     But you just testified that you did not  
25     re-marry after you divorced Jaswinder's brother

1 and you just testified you knew you divorced  
2 Jaswinder.

3 A. He had divorced me to get his brother  
4 here, and he had told me that this will not be a  
5 permanent divorce, it would just be a divorce on  
6 papers.

7 Q. But you knew the judge had signed the  
8 Decree of Divorce?

9 A. He never showed me any papers that the  
10 judge signed or not signed.

11 Q. But you were aware you were divorced?

12 A. I just told you that it was just to get  
13 his brother. In reality, we were not divorced  
14 from each other.

15 Q. That was not my question. My question  
16 was you were aware that you were divorced,  
17 correct?

18 A. Yes, I do. Yes, I know.

19 Q. What are you asking for in the  
20 California divorce action?

21 A. We had a joint account and all my  
22 jewelry was with him. I'm claiming that.

23 Q. Anything else?

24 A. We had bought the house together and  
25 that also. That's it.

1 Q. How much money?

2 A. We had a joint account and I'm asking  
3 for my share of that.

4 Q. Which was about how much,  
5 approximately?

6 A. About \$400,000.

7 Q. When did you buy your house?

8 A. In 2009.

9 Q. Do you know how much money you had in  
10 the bank on or about September 8, 2004?

11 A. I don't quite recall exactly how much  
12 money there was at that time.

13 Q. 100 million?

14 A. I don't know. I didn't check. My  
15 husband did.

16 Q. My question is did you have 100  
17 million?

18 A. I don't remember that. I don't know.

19 Q. When did you build your bank account up  
20 to at least \$400,000?

21 A. I used to work.

22 Q. The question is calling for a date or a  
23 time frame.

24 A. I used to work two jobs.

25 Q. Once again, the question is asking for



1 a time frame because you are claiming that he  
2 took at least \$400,000 of your money out of the  
3 bank.

4 MR. KYNASTON: Objection. Assumes  
5 facts not in evidence.

6 You can answer.

7 THE WITNESS: He would also work and we  
8 had a joint account.

9 BY MR. JAMES:

10 Q. So when did he take the money out?  
11 Because you answered in your interrogatories he  
12 took \$400,000 from your joint account. When did  
13 that happen, approximately?

14 A. I realized in 2016 that this has  
15 happened.

16 Q. When did you start looking at how much  
17 money was in your bank account?

18 A. In 2015 when we came back from India,  
19 at that time, he separated the account and took  
20 that money.

21 Q. My question was when did you start  
22 looking at your bank accounts? Because you  
23 testified in or around September of 2004, you  
24 weren't looking at your bank accounts. Yet, you  
25 are testifying that he took \$400,000 from your

1 joint account. So at some point, you started  
2 looking at bank accounts. I would like to know  
3 approximately when that was.

4 A. In 2016.

5 Q. What caused you to look at your bank  
6 accounts at that time?

7 A. In 2016.

8 Q. That wasn't my question. My question  
9 was why, what caused you to look.

10 A. We went in in 2015 and at that time,  
11 his behavior with me was not good and he didn't  
12 give me money for the ticket to India. And at  
13 that time, I came to know that there was so much  
14 money in the bank and it was no more.

15 Q. And that was in 2016?

16 A. Yes.

17 MR. JAMES: Go off the record.

18 (Recess taken from 10:05 a.m. to  
19 10:08 a.m.)

20 MR. JAMES: I have nothing further.

21 MR. KYNASTON: I have no questions for  
22 this witness.

23 (Proceedings concluded at  
24 10:08 a.m.)  
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CERTIFICATE  
OF  
CERTIFIED COURT REPORTER

\* \* \* \* \*

I, the undersigned Certified Court Reporter in and for the State of Nevada, do hereby certify:

That the foregoing proceedings were taken before me at the time and place therein set forth, at which time the witness was put under oath by me; that the testimony of the witness and all objections made at the time of the proceedings were recorded stenographically by me and were thereafter transcribed under my direction; that the foregoing is a true record of the testimony and of all objections made at the time of the proceedings.

There being no request by the deponent or party to read and sign the deposition transcript, under Rule 30(e), signature is deemed waived. The original transcript will be forwarded to Peter James, Esq.

I further certify that I am a disinterested person and am in no way interested in the outcome of said action or connected with or related to any of the parties in said action or to their respective counsel.

The dismantling, unsealing or unbinding of the original transcript will render the reporter's certificate null and void.

In witness whereof, I have subscribed my name on this date, August 30, 2019.

\_\_\_\_\_/s/ Cindy Huebner\_\_\_\_\_  
Cindy Huebner  
CCR No. 806

ORIGINAL

55

1 DECD  
 2 (Your name) Jaswinder Singh  
 3 (Address) 2916 Jansen Ave  
 4 Las Vegas NV 89101  
 5 (Telephone) (702)281-2373  
 6 In Proper Person

FILED

SEP 8 8 42 AM '04

*Shirley S. Paragiani*  
CLERK

7 DISTRICT COURT  
 8 CLARK COUNTY, NEVADA

9 In the Matter of the  
 10 Joint Petition of  
 11 (Name) Jaswinder Singh  
 12 and (Name) Rajwant Kaur  
 13 Petitioners.

14 CASE NO.: D323977  
 15 DEPT. NO.: K

16 DECREE OF DIVORCE

17 The above-entitled cause having been submitted to the above-entitled Court for decision  
 18 pursuant to Chapter 125 of the Nevada Revised Statutes, and based upon the Joint Petition by  
 19 Petitioner Jaswinder Singh and Petitioner Rajwant Kaur  
 20 and all of the papers and pleadings on file, finds as follows:

- 21 1. That all of the allegations contained in the documents on file are true;  
 22 2. That all of the requirements of NRS 125.181 and NRS 125.182 have been met;  
 23 3. That this Court has complete jurisdiction as to the parties and the subject matter  
 24 thereto;  
 25 4. That Petitioner Jaswinder Singh has been and is now an actual  
 26 bona fide resident Clark County, Nevada, and has actually been domiciled in Clark County for  
 27

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EXHIBIT	1
WITNESS	<u>Rajwant Kaur</u>
DATE:	<u>8/19/19</u>
CINDY HUEBNER, CCR	

1 more than six (6) weeks immediately prior to the commencement of this action;  
2 5. That the parties were married on (date of wedding) Nov. 11, 1989 in (city  
3 and state) Punjab, India;

4 6. That the parties are incompatible in marriage and are entitled to a Decree of  
5 Divorce on the grounds of incompatibility;

6 7. That there are no minor children the issue of this marriage;

7 8. That there are no minor children adopted by the parties;

8 9. That Petitioner Rajwant Kaur is not now pregnant;

9 10. That there is no community property for the Court to divide;

10 11. That there is no community debt for the Court to divide;

11 12. (CHECK ONLY ONE BOX)

12 [ ] That Petitioner \_\_\_\_\_ does not desire to have her  
13 former or maiden name restored.

14 OR

15 [ ] That Petitioner \_\_\_\_\_ requests that her former or  
16 maiden name of \_\_\_\_\_ be restored.

17 OR

18 [x] That Petitioner Rajwant Kaur never changed her name, and  
19 therefore does not request restoration of a former or maiden name.

20 13. That both parties have waived any right to spousal support;

21 14. That the parties waive their rights to written Notice of Entry of Decree of Divorce,  
22 to appeal, to Findings of Fact and Conclusions of Law, and to move for a new trial;

23 Therefore, **IT IS ORDERED, ADJUDGED AND DECREED** that the bonds of matrimony  
24 now and heretofore existing between the Petitioners are hereby wholly dissolved, set aside and forever  
25 held for naught, and an absolute Decree of Divorce is hereby granted to the parties, and each of the  
26 parties are hereby restored to the status of a single, unmarried person.

27 ///

1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Petitioner  
2 Rajwant Kaur [ ] does/ [x] does not desire to have her former name restored and  
3 her name shall [ ] change to/ [x] stay as name of Rajwant Kaur.

4 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that both parties are required  
5 to provide their social security numbers on a separate form to the Court and to the Welfare Division  
6 of the Department of Human Resources pursuant to NRS 125.130. Such information shall be  
7 maintained by the Clerk in a confidential manner and not part of the public record.

8 DATED this 7<sup>th</sup> day of (month) September, (year) 2004

9  
10  
11 Respectfully Submitted: M. A. D.  
DISTRICT COURT JUDGE JMB  
12 (Your signature) Jaswinder Singh

13 Jaswinder Singh  
14 2916 Jansen Ave  
15 Las Vegas NV 89101  
16 (702)281-2373  
Petitioner in Proper Person

17 (Spouse's signature) Rajwant Kaur  
18 Rajwant Kaur

19 (Address) 9969 Sepulveda Blvd #204  
20 Mission Hills, CA 91345

21 (Telephone) (818)895-7302  
Petitioner in Proper Person

22 ///  
23 ///  
24 ///  
25 ///  
26 ///  
27 ///

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*Shirley L. Hargrave*  
CLERK

1 AFFR

2 (Your name) Jaswinder Singh

3 (Address) 2916 Jansen Ave

Las Vegas NV 89101

4 (Telephone) (702)281-2373

In Proper Person

5  
6 DISTRICT COURT  
7 CLARK COUNTY, NEVADA  
8

9 In the Matter of the  
10 Joint Petition of

11 (Name) Jaswinder Singh

12 and (Name) Rajwant Kaur

13 Co-Petitioners.  
14

D323977

CASE NO.: \_\_\_\_\_

DEPT. NO.: 12

15 AFFIDAVIT OF RESIDENT WITNESS

16 STATE OF NEVADA

17 COUNTY OF CLARK

} ss:

18  
19 1. I, (name of Resident Witness) Balbinder Singh Pabla, do solemnly swear to  
20 testify herein to the truth, the whole truth and nothing but the truth.

21 2. That I live at (Resident Witness' address) 2916 Jansen Ave

22 (city) Las Vegas, Nevada, (zip code) 89101.

23 3. That I first moved to Clark County, Nevada on (approximate date Resident Witness  
24 moved to Clark County) 1992. It is my intention to live in Clark County for  
25 the foreseeable future.

26 4. That I first saw Petitioner (Petitioner's name) Jaswinder Singh

27 in Clark County, Nevada on (approximate date) June 17, 2004.

28  
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1           5.       That since that date, I have seen (Petitioner's name) Jaswinder Singh  
2 in Clark County, Nevada approximately 5 times per week.

3           6.       That I know of my own personal knowledge that Petitioner (Petitioner's name)  
4 Jaswinder Singh is a bona fide resident of Clark County, Nevada.

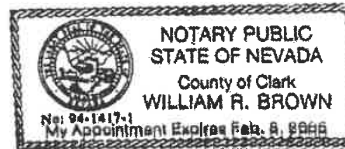
5  
6  
7 Dated this 27 day of (month) Aug, 2004.

8  
9  
10 (Witness' signature) Balbinder S. Pabla

11 Balbinder Singh Pabla  
12

13 SUBSCRIBED and SWORN to before  
14 me this 27 day of  
15 (month) Aug, (year) 2004.

16 William R. Brown  
17 NOTARY PUBLIC





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AUG 27 3 33 PM '04

Shirley L. Longenecker  
CLERK

1 PSDD

2 (Your name) Jaswinder Singh

3 (Address) 2916 Jansen Ave

4 Las Vegas NV 89101

5 (Telephone) (702)281-2373

6 In Proper Person

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

9  
10 In the Matter of the  
11 Joint Petition of

12 (Name) Jaswinder Singh

13 and (Name) Rajwant Kaur

14 Petitioners.

CASE NO.

D323977

DEPT. NO.:

K

15  
16 **JOINT PETITION FOR SUMMARY DECREE OF DIVORCE**

17 Petitioners, Jaswinder Singh and Rajwant Kaur hereby petition this  
18 Court, pursuant to the terms of Chapter 125 of the Nevada Revised Statutes, to grant them a  
19 divorce. Petitioners respectfully show, and under oath, state to the Court as follows:

20 1. That Petitioner, Jaswinder Singh, is now, and for more than six  
21 weeks preceding the commencement of this action has been, an actual, bona fide resident of the  
22 County of Clark, State of Nevada, and during all said period of time has been actually, physically  
23 and corporeally present, residing and domiciled in the State of Nevada.

24 2. That the Petitioners are incompatible in marriage.

25 3. That the Petitioners have no minor children who are the issue of this marriage, have  
26 no adopted minor children, and Petitioner Rajwant Kaur is not now pregnant.

27  
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1 WHEREFORE, Petitioners pray that the Court enter a Decree of Divorce restoring them to  
2 the status of single, unmarried persons.

3  
4 DATED this (day) 27 day of  
5 (month) August, (year) 2004.

DATED this (day) 27 day of  
(month) August, (year) 2004.

6  
7 Jaswinder Singh  
8 (Your Signature)  
9 Petitioner

Rejwanti Kaur  
(Spouse's Signature)  
Petitioner

10  
11 VERIFICATION

12 STATE OF NEVADA }  
13 COUNTY OF CLARK } ss:

14 Jaswinder Singh, under penalties of perjury, being first duly sworn, deposes  
15 and says:

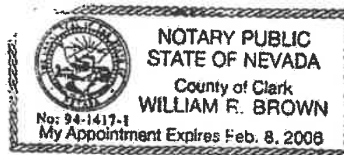
16 That I am the Petitioner in the above-entitled action; that I have read the foregoing Joint  
17 Petition for Summary Decree of Divorce and know the contents thereof; that the same is true of  
18 my own knowledge, except for those matters therein contained stated upon information and belief,  
19 and as to those matters, I believe them to be true.

20 DATED this 27 day of (month) Aug, (year) 2004.

21  
22 By:  
23 (Your signature) Jaswinder Singh  
24 Jaswinder Singh

25 SUBSCRIBED and SWORN to before  
me this 27 day of  
26 (month) Aug, (year) 2004.

27 William F. Brown  
NOTARY PUBLIC



1 **ACKNOWLEDGMENT**

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

4 On this 27 day of (month) August, (year) 2004, before me, the undersigned  
5 Notary Public in and for the said County and State, personally appeared Jaswinder Singh,  
6 known to me to be the person described in and who executed the foregoing Joint Petition for  
7 Summary Decree of Divorce, and who acknowledged to me that (check one) [x] he/ [ ] she did  
8 so freely and voluntarily and for the uses and purposes therein mentioned.

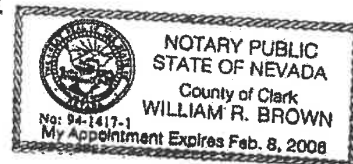
9 WITNESS my hand and official seal.

10 William R. Brown

11 NOTARY PUBLIC

12 **VERIFICATION**

13 STATE OF NEVADA }  
14 COUNTY OF CLARK } ss:



15 Rajwant Kaur, under penalties of perjury, being first duly sworn, deposes  
16 and says:

17 That I am the Petitioner in the above-entitled action; that I have read the foregoing Joint  
18 Petition for Summary Decree of Divorce and know the contents thereof; that the same is true of  
19 my own knowledge, except for those matters therein contained stated upon information and belief,  
20 and as to those matters, I believe them to be true.

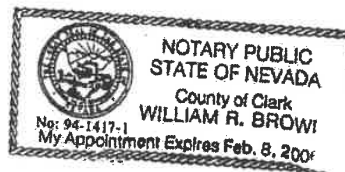
21 DATED this 27 day of (month) Aug., (year) 2004.

22 By:

23 (Spouse's signature) Rajwant Kaur  
24 Rajwant Kaur

25 SUBSCRIBED and SWORN to before  
26 me this 27 day of  
(month) Aug., (year) 2004.

27 William R. Brown  
NOTARY PUBLIC



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