

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

2 DENNIS VINCENT STANTON,

3 Appellant/Cross-Respondent,

4 vs.

5 TWYLA MARIE STANTON,

6 Respondent/Cross-Appellant.

Supreme Court Case No.: 80910

District Court Case No. CV-0029304
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8 **APPENDIX OF EXHIBITS TO APPELLANT/CROSS-RESPONDENT**

9 **DENNIS VINCENT STANTON’S OPENING BRIEF**

10
11 **VOLUME 4 OF 4**

12 **[JA000630 – JA000681]**

13
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ALPHABETICAL APPENDIX PER NRAP 30(C)(2)

AFFIDAVIT IN SUPPORT OF REQUEST FOR SUMMARY DISPOSITION, DATED 5-17-2018	Volume 1; JA000018 – JA000020
AFFIDAVIT OF ROBERT CRAWFORD AND CARMEN CRAWFORD, DATED 7-5-2019	Volume 3; JA000626 – JA000629
AFFIDAVIT OF TWYLA M. STANTON IN REGARDS TO THE SIGNING AND FILING OF THE NEW DECREE OF DIVORCE AND THE AMENDED JOINT PETITION FOR SUMMARY DECREE OF DIVORCE, DATED 1-04-2019	Volume 1; JA000218 – JA000220
AMENDED JOINT PETITION FOR SUMMARY DECREE OF DIVORCE, DATED 6-05-2018	Volume 1; JA000022 – JA000038
CERTIFIED TRANSCRIPT OF ALL PENDING MOTIONS, ON 2-10-2020	Volume 4; JA000644 – JA000657
CERTIFIED TRANSCRIPT OF DEFENDANTS MOTION FOR RECONSIDERATION, ON 6-10-2019	Volume 3; JA000571 – JA000582
CERTIFIED TRANSCRIPT OF DEFENDANTS MOTION TO SET ASIDE DECREE/DISMISS JOINT PETITION, ON 1-07-2019	Volume 2; JA000221 – JA000266
COURT ORDER, DATED 12-14-2018	Volume 1; JA000178 – JA000179
COURT ORDER, DATED 2-28-2020	Volume 4; JA000658 – JA000676
EX PARTE APPLICATION TO SEAL FILE, DATED 7-05-2018	Volume 1; JA000067
EX PARTE APPLICATION TO UNSEAL COURT RECORD, DATED 11-20-2018	Volume 1; JA000069 – JA000073
EX PARTE MOTION FOR TO EXTEND THE TIME REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION, DATED 12-13-2018	Volume 1; JA000169 – JA000177
EXHIBIT APPENDIX TO MOTION FOR RECONSIDERATION [EXHIBITS A – T], DATED 4-15-2019	Volume 2; JA000316 – JA000410
EXHIBIT APPENDIX TO MOTION FOR RECONSIDERATION [EXHIBITS U – KK], DATED 4-15-2019	Volume 3; JA000411 – JA000532

FIRST JOINT PETITIONER/PLAINTIFF'S NOTICE OF NON-OPPOSITION TO SECOND JOINT PETITIONER/DEFENDANT'S MOTION FOR RECONSIDERATION, DATED 5-19-2019	Volume 3; JA000551 – JA000553
FIRST JOINT PETITIONER/PLAINTIFF'S MOTION PURSUANT TO RULE 60(B) TO SET ASIDE DECREE OF DIVORCE AS FRAUDULENTLY OBTAINED, TO DISMISS THE JOINT PETITION FOR DIVORCE WITH PREJUDICE, AND TO SANCTION DEFENDANT FOR FORUM SHOPPING AND PERPETRATING A FRAUD UPON THE COURT IN THE FULL AMOUNT OF PLAINTIFF'S FEES AND COSTS, DATED 11-27-2018	Volume 1; JA000074 – JA000167
FIRST JOINT PETITIONER/PLAINTIFF'S REPLY TO OPPOSITION TO MOTION PURSUANT TO RULE 60(B) TO SET ASIDE DECREE OF DIVORCE WITH PREJUDICE, AND TO SANCTION DEFENDANT FOR FORUM SHOPPING AND PERPETRATING A FRAUD UPON THE COURT IN THE FULL AMOUNT OF PLAINTIFF'S FEES AND COSTS AND OPPOSITION TO COUNTERMOTION TO STRIKE MOVANT'S MOTION AS BEING FILED WITHOUT AUTHORITY AND IN A DIRECT CONFLICT OF INTEREST, AND FOR ATTORNEY'S FEES, DATED 1-02-2019	Volume 1; JA000210 – JA000217
JOINT PETITION FOR SUMMARY DECREE OF DIVORCE, DATED 5-17-2018	Volume 1; JA000001 – JA000017
NOTICE OF MOTION AND MOTION FOR RECONSIDERATION, DATED 4-15-2019	Volume 2; JA000283 – JA000315
NEW DECREE OF DIVORCE, DATED 6-07-2018	Volume 1; JA000039 – JA000062
NOTICE OF APPEAL, DATED 4-16-2019	Volume 3; JA000533 – JA000534
NOTICE OF APPEAL, DATED 3-26-2020	Volume 4; JA000677 – JA000678
NOTICE OF CROSS-APPEAL, DATED 3-27- 2020	Volume 4; JA000679 – JA000681
NOTICE OF ENTRY OF ORDER AND JUDGMENT, DATED 3-20-2019	Volume 2; JA000274 – JA000282
NOTICE OF ENTRY OF ORDER/JUDGMENT, DATED 6-06-2019	Volume 3; JA000556
OPPOSITION TO MOTION FOR RECONSIDERATION, DATED 7-03-2019	Volume 3; JA000583 – JA000625

1	OPPOSITION TO PLAINTIFF'S MOTION	Volume 1; JA000180 –
2	PURSUANT TO RULE 60(B) TO SET ASIDE	JA000209
3	DECREE OF DIVORCE AS FRAUDULENTLY	
4	OBTAINED, TO DISMISS THE JOINT PETITION	
5	FOR DIVORCE WITH PREJUDICE, AND TO	
6	SANCTION DEFENDANT FOR FORUM	
7	SHOPPING AND PERPETRATING A FRAUD	
8	UPON THE COURT IN THE FULL AMOUNT OF	
9	PLAINTIFF'S FEES AND COSTS, AND	
10	COUNTERMOTION TO STRIKE MOVANT'S	
11	MOTION AS BEING FILED WITHOUT	
12	AUTHORITY AND IN A DIRECT CONFLICT OF	
13	INTEREST, AND FOR ATTORNEY'S FEES,	
14	DATED 12-26-2018	
15	ORDER AND JUDGMENT, DATED 3-18-2019	Volume 2; JA000267 –
16		JA000273
17	ORDER DISMISSING APPEALS, DATED 6-05-	Volume 3; JA000554 –
18	2019	JA000555
19	ORDER SEALING FILE, DATED 7-09-2018	Volume 1; JA000068
20	ORDER TO UNSEAL COURT RECORD, DATED	Volume 1; JA000168
21	11-28-2018	
22	QUALIFIED DOMESTIC RELATIONS ORDER,	Volume 1; JA000063 –
23	DATED 6-07-2018	JA000066
24	REPLY TO NOTICE OF NON-OPPOSITION TO	Volume 3; JA000557 –
25	MOTION FOR RECONSIDERATION, DATED 6-	JA000570
	10-2019	
	REQUEST FOR SUMMARY DISPOSITION ON	Volume 1; JA000021
	DECREE, DATED 5-17-2018	
	SECOND SUPPLEMENT TO THE MOTION	Volume 4; JA000630
	FOR RECONSIDERATION, DATED 2-07-2020	– JA000643
	SUPPLEMENT TO THE MOTION FOR	Volume 3; JA000535 –
	RECONSIDERATION, DATED 5-10-2019	JA000550

Dated this 12th of March 2021.

HOLLEY DRIGGS

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FILED
FIFTH JUDICIAL DISTRICT

FEB - 7 2020

[Signature]
Nye County Clerk
Deputy

8 **IN THE FIFTH JUDICIAL DISTRICT COURT OF THE**
9 **STATE OF NEVADA, IN AND FOR THE COUNTY OF NYE**

10 TWYLA MARIE STANTON,
11 AN INDIVIDUAL;
12 First Joint Petitioner/Plaintiff,
13 And
14 DENNIS VINCENT STANTON,
15 AN INDIVIDUAL;
16 Second Joint Petitioner/Defendant.

Case No.: CV-39304

Dept. No.: 2

SECOND SUPPLEMENT TO THE
MOTION FOR
RECONSIDERATION

17 **I. INTRODUCTION**

18 **Comes Now**, Second Joint Petitioner/Defendant, DENNIS VINCENT
19 STANTON, by and through in proper person, and herewith, brings forth, submits, files, moves,
20 and respectfully supplements his Motion for Reconsideration with this **SECOND**
21 **SUPPLEMENT TO THE MOTION FOR RECONSIDERATION.**

22 **II. NEVADA RULE OF CIVIL PROCEDURE 60(b)**

23 **VIOLATIONS**

24 Due to the fact that the Un-Registered Ex-Temporary Co-Guardianship was not
25 registered in the State of Nevada as was required per NRS 159.2025 and NRS 159.2027, the
26 Motion to Set Aside under NRCP 60(b) filed by the Un-Registered Ex-Temporary Co-Guardians
27 **SECOND SUPPLEMENT TO THE MOTION FOR RECONSIDERATION - 1**

1 was not permitted or according by law. The Un-Registered Ex-Temporary Co-Guardians were
2 not properly before the court and were never parties to the marriage or the divorce and had no
3 right or authority under Nevada law to attack or set aside the New Decree of Divorce and the
4 Amended Joint Petition for Divorce.
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6 NRS 125.2027 clearly and explicitly states and shows that only upon and after
7 the registration of a foreign guardianship does that guardianship obtain the powers as if that
8 guardianship had been entered in the State of Nevada. Even in Plaintiff's parents' Reply to the
9 Opposition, Mr. Lobello and Mr. Owen (previous counsel to the Ex-Temporary Co-Guardians)
10 admitted that the Motion to Set Aside and the Un-Registered Ex-Temporary Co-Guardianship
11 are deficient because the Un-Registered Ex-Temporary Co-Guardianship was not properly
12 registered in the State of Nevada by writing and stating that they "anticipated that the Court in
13 Arkansas would grant a permanent guardianship and issue the appropriate (guardianship)
14 letters", "these (letters of guardianship) would have been issued there (The State of Arkansas)
15 and the guardianship registered here (The State of Nevada)", "the guardianship was not timely
16 registered, so be it" and there was "a procedural defect in the Motion's filing." (See Reply to
17 Opposition, p. 4, l. 7-8, 13-17) Not only was the Un-Registered Ex-Temporary Co-Guardianship
18 not timely registered, IT WAS NEVER REGISTERED IN THE STATE OF NEVADA AND
19 LETTERS OF GUARDIANSHIP WERE NEVER ISSUED. The "procedural defect" that the
20 Movants who were not parties to the marriage refer to is the law of the State of Nevada. See
21 **NRS 159.2025 and NRS 159.2027.** Nevada Law is specifically clear and not ambiguous. Their
22 "anticipation" and assumption were completely wrong and based on false hope and misguided at
23 best and the "UN" Verified Petition was filed under completely false pretenses and when the
24 guardianship in Arkansas was heard, it was subsequently dismissed, laid to rest, and found to not
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SECOND SUPPLEMENT TO THE MOTION FOR RECONSIDERATION - 2

1 be needed. See **Maradiaga v. United States**, 679 F.3d 1286, 1294 (11th Cir. 2012) (“It is not
2 an abuse of discretion for the district court to deny a motion under Rule 60(b) when that motion
3 is premised upon an argument that the movant could have, but did not, advance before the
4 district court entered judgment.”). The Sixth and Tenth Circuits have held that the Rule (60(b))
5 requires a motion from the *affected* party. See **Kingvision Pay-Per-View v. Lake Alice Bar**,
6 **168 F.3d 347, 351 (9th Cir. 1999)** (citing **Eaton v. Jamrog**, 984 F.2d 760, 762 (6th Cir.
7 **1993**)); **Dow v. Baird**, 389 F.2d 882, 884-85 (10th Cir. 1968). The Un-Registered Ex-
8 Temporary Co-Guardians were not the affected party and are not parties to this action.
9

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11 Because the Un-Registered Ex-Temporary Co-Guardianship was not registered in
12 the State of Nevada as was required by Nevada law, the Un-Registered Ex-Temporary Co-
13 Guardians did not have any authority or standing to bring or file a 60(b) Motion on behalf of
14 First Joint Petitioner/Plaintiff and lacked any merit to do so. As a matter of fact not only did the
15 Un-Registered Ex-Temporary Co-Guardians not register the guardianship and never received any
16 letters of guardianship, but finally admitted and agreed that the Un-Registered Ex-Temporary
17 Co-Guardianship was not needed after all when they agreed and signed the Agreed Order by and
18 through their attorney, Boyd Tackett, Jr. on February 19, 2019. See **Exhibit I, Agreed Order to**
19 **Dismiss the temporary co-guardianship in the Motion for Reconsideration**. Why try so hard
20 to obtain a guardianship over First Joint Petitioner/Plaintiff and her estate and then agree that it
21 was not needed after all? Because since First Joint Petitioner/Plaintiff had hired and retained
22 counsel in Arkansas to fight and oppose the Un-Registered Ex-Temporary Co-Guardianship,
23 they realized that they were no longer going to be able to control her estate and control her
24 finances. The Un-Registered Ex-Temporary Co-Guardians were attempting to gain control of
25 First Joint Petitioner/Plaintiff to obtain funds on her behalf to convert for their personal use and
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SECOND SUPPLEMENT TO THE MOTION FOR RECONSIDERATION - 3

1 personal benefit. The Un-Registered Ex-Temporary Co-Guardians had loaned First Joint
2 Petitioner/Plaintiff a large sum of money to pay for a divorce and were using the guardianship
3 process to obtain re-payment of that money. That was the true motivation of the Un-Registered
4 Ex-Temporary Co-Guardians. **See Exhibit A, Paragraph 8 in RESPONSE TO**
5 **PETITIONERS' PETITION FOR APPOINTMENT AS CO-GUARDIANS in Opposition**
6 **to Motion to Set Aside.**

8 The Un-Registered Ex-Temporary Co-Guardians have already shown in the past
9 that they have mismanaged, mishandled, and extorted First Joint Petitioner/Plaintiff's money and
10 finances before. When First Joint Petitioner/Plaintiff's real father passed away when she was 1
11 years old, she started to receive his death benefits from social security of about \$800.00 a month
12 a few years later. The Un-Registered Ex-Temporary Co-Guardians would take \$400.00 from
13 First Joint Petitioner/Plaintiff a month and supposedly put it into a savings account for her and
14 when she was ready to move out and leave the home they would give her the money in the
15 savings account, however, that never happened and the Un-Registered Ex-Temporary Co-
16 Guardians never gave her a penny or a dime. It is estimated that the amount of money that was
17 stolen and extorted from First Joint Petitioner/Plaintiff was approximately \$62,400.00 based on
18 \$400.00 a month for 13 years. First Joint Petitioner/Plaintiff can attest and testify to this as well.
19 Till this day, the Un-Registered Ex-Temporary Co-Guardians have never told First Joint
20 Petitioner/Plaintiff what has happened to her money or where it went. It is believed that the
21 entire amount of \$62,400.00 from First Joint Petitioner/Plaintiff's real father's social security
22 death benefits were used by the Un-Registered Ex-Temporary Co-Guardians for their own
23 personal use and benefit and enrichment.
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1 **III. THE CONDUCT OF THE UN-REGISTERED EX-**
2 **TEMPORARY CO-GUARDIANS TOWARDS FIRST JOINT**
3 **PETITIONER/PLAINTIFF AND PAST SEXUAL ASSAULTS**
4 **AGAINST HER**

5 Second Joint Petitioner/Defendant would like to paint a clear and vivid picture for
6
7 the court so that the court can actually see what First Joint Petitioner/Plaintiff actually went
8 through from her own eyes and personal perspective and to try to express to the court how the
9 Un-Registered Ex-Temporary Co-Guardians mistreated her while she was in the state of
10 Arkansas. After the divorce was granted by this court on June 07, 2018, First Joint
11 Petitioner/Plaintiff was visiting and staying with her grandmother and her Aunt in Conway,
12 Arkansas. While she was there visiting, her mother and step-dad sought to obtain and get
13 Temporary Co-Guardianship of her by hiring a guardianship attorney and filing a
14 Petition/Affidavit with the Probate Court in Faulkner County, Arkansas without her knowledge
15 and shopping around for psychologists for her until they finally found one they liked. They never
16 told her their true reason for shopping around for different doctors, but now she knows the true
17 reason why. The Un-Registered Ex-Temporary Co-Guardianship went uncontested and no
18 hearing was set for it as it simply was just granted based on what they had stated in their Verified
19 Petition which included a lot of factual misrepresentations in it. She was then served with papers
20 for a court hearing for permanent Guardianship that was scheduled for Monday, December 10,
21 2018. At some point, First Joint Petitioner/Plaintiff's parents came over to her grandmother's and
22 aunt's house and took from her the papers that she was served with that had the court hearing's
23 date on it and told her to not bother coming to the scheduled hearing set for Monday, December
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1 10, 2018 at 09:00 a.m. They took her service from her so that she was kept in the dark regarding
2 the Ex-Temporary Co-Guardianship. At this point in time, they also told her that they also have
3 Temporary Co-Guardianship of her and they "are now in charge of her" and "not to bother
4 calling Mr. Lobello or Mr. Owen (her previous divorce attorneys) in Las Vegas to help her
5 because they are now their attorneys". First Joint Petitioner/Plaintiff didn't know what
6 guardianship meant since she never dealt with a guardianship before. So, she started to Google
7 and research it and that was when she realized what it really meant and that all of her legal and
8 property rights in play. So, when she needed legal advice and legal counsel the most, First Joint
9 Petitioner/Plaintiff could no longer turn to or call or consult with her previous attorneys, Mr.
10 Lobello and Mr. Owen, for help or assistance since they were now representing parties that were
11 directing adverse to her interests and were also helping the Ex-Temporary Co-Guardians legally
12 extort money from her through the Guardianship process. This left First Joint Petitioner/Plaintiff
13 in a very vulnerable state and position. At this point, she did not know what to do. So, First Joint
14 Petitioner/Plaintiff contacted the probate court to see when the actual court date was for the
15 permanent guardianship and that is when she realized that she had to do something or they were
16 going to obtain and have permanent guardianship of her and that is not what she wanted at all.
17 So, about a week before the court hearing for permanent guardianship, First Joint
18 Petitioner/Plaintiff consulted with a few guardianship attorneys in Conway, Arkansas and
19 explained her situation to them and finally she hired and retained Ron L. Goodman, Esq. in
20 Conway, Arkansas to represent her interests in the guardianship process. Her attorney was able
21 to electronically file her Response to Petitioners' Petition for Appointment as Co-Guardians on
22 Thursday, December 06, 2018 and also request a continuance of the hearing. When the Ex-
23 Temporary Co-Guardians realized that she had retained her own counsel to oppose the
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SECOND SUPPLEMENT TO THE MOTION FOR RECONSIDERATION - 6

guardianship, they became very upset and extremely irate. At this point, she had asked Second Joint Petitioner/Defendant if he would be able to travel to Arkansas with the children so that they would be able to testify on her behalf to oppose the guardianship at the scheduled court hearing. Not knowing that the guardianship hearing had been continued, Second Joint Petitioner/Defendant and the 6 children were already committed to the road trip since they were already traveling and driving through Arizona to get to Arkansas. Second Joint Petitioner/Defendant and the children then attempted to visit with First Joint Petitioner/Plaintiff on Sunday morning, December 09, 2018. When the Ex-Temporary Co-Guardians realized that Second Joint Petitioner/Defendant and all her children were in town to visit her, they physically prevented her from seeing any of her children. Keep in mind that at this point, First Joint Petitioner/Plaintiff had not seen any of her children for about 3 months. First Joint Petitioner/Plaintiff's stepdad (Robert Crawford, Ex-Temporary Co-Guardian) physically got on top of First Joint Petitioner/Plaintiff and pinned her down while her mother (Carmen Crawford, Ex-Temporary Co-Guardian) took her cell phone from First Joint Petitioner/Plaintiff so that she could no longer communicate with her guardianship attorney and speak and visit with her children while they were in town to visit her. The Ex-Temporary Co-Guardians had prevented her many times before from speaking and communicating with her guardianship attorney regarding her opposition to the guardianship. While Second Joint Petitioner/Defendant and First Joint Petitioner/Plaintiff's children were in town, the Ex-Temporary Co-Guardians kept moving her from house to house and hiding and taking off the house numbers of the places that they were taking her to and keeping her at so that she didn't know where she physically was or being kept. Second Joint Petitioner/Defendant and children were in town for about 2 days and had driven

1 and traveled about 3,000 miles round trip to see First Joint Petitioner/Plaintiff and she was not
2 allowed to see them and never did get to see her children while they were in town to see her.

3 First Joint Petitioner was finally able to "escape" a few days later from a locked
4 house with the alarm set by running into a cab with just the clothes on her back to take her to the
5 airport and fly back to Las Vegas to be with her children. This entire ordeal was just surreal for
6 First Joint Petitioner/Plaintiff and it's as First Joint Petitioner was in a real-life horror movie from
7 Hollywood. First Joint Petitioner/Plaintiff was basically legally kidnapped and legally held
8 against her will by the Ex-Temporary Co-Guardians.
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10 Moreover, the Un-Registered Ex-Temporary Co-Guardians had scheduled and
11 made an appointment to try to have First Joint Petitioner/Plaintiffs tubes tied without her consent
12 or approval because they told her that, "We are now your guardians."
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14 When First Joint Petitioner/Plaintiff's guardianship attorney, Ron L. Goodman,
15 Esq., came over to visit with First Joint Petitioner/Plaintiff to discuss her case because she was
16 not allowed to leave the home, they cussed, yelled, and spit on him, and called the police on him
17 in which the police told the Ex-Temporary Co-Guardians that First Joint Petitioner/Plaintiff had
18 every right to speak with her attorney regarding her case. The Ex-Temporary Co-Guardians
19 would also drug First Joint Petitioner/Plaintiff by putting drugs in her food and drinks to force
20 her to write and sign paperwork and try and calm First Joint Petitioner/Plaintiff down because
21 she wanted to leave and go back home to Las Vegas to be with her children. Some nights First
22 Joint Petitioner was not allowed to eat and drink because she was told that she had a bad attitude
23 by the Ex-Temporary Co-Guardians. The Ex-Temporary Co-Guardians would withhold food and
24 meals from her on a nightly basis. First Joint Petitioner/Plaintiff did not want to be there and was
25 scared to continue to be there. An investigation was opened and being conducted by the
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SECOND SUPPLEMENT TO THE MOTION FOR RECONSIDERATION - 8

1 Arkansas Adult Protective Services regarding the Ex-Temporary Co-Guardians' treatment of
2 First Joint Petitioner/Plaintiff. The updated case number is 43973 and the name of the
3 investigator assigned to the case is Woodrow Hepler and his phone contact information is (501)
4 320-3963. **Please see Exhibit AA In The Motion for Reconsideration which is the police**
5 **report of damage to First Joint Petitioner/Plaintiff's residence by the Ex-Temporary Co-**
6 **Guardians after they realized that First Joint Petitioner/Plaintiff was not going to be able**
7 **to pay them back for all the attorney fees they had spent in the First Divorce Action on her**
8 **behalf. Also see Exhibit KK In the Motion for Reconsideration which were the Ex-**
9 **Temporary Co-Guardian's empty threats that they sent First Joint Petitioner/Plaintiff to**
10 **try to intimidate and threaten her.**

13 The Ex-Temporary Co-Guardians also called an ambulance to take First Joint
14 Petitioner/Plaintiff to the hospital to try to have her committed when there was absolutely
15 nothing wrong with her. So, while First Joint Petitioner/Plaintiff's children were in town to be
16 and visit with their mother, she was in an emergency room for 12 hours while the Ex-Temporary
17 Co-Guardians were trying to have her committed, however, their attempt failed and did not
18 work. The Ex-Temporary Co-Guardians made up a story that she was crazy and trying to hurt
19 herself etc... So, First Joint Petitioner/Plaintiff was examined by a psychiatrist who told the Ex-
20 Temporary Co-Guardians that they were going to release her because she was just simply
21 emotional because she wanted to see her children and go back home to Las Vegas. The Ex-
22 Temporary Co-Guardians did not like the first psychiatrist's decision so then they asked for a
23 second psychiatrist to evaluate her instead. The hospital reluctantly agreed and so First Joint
24 Petitioner/Plaintiff waited for another couple of hours for the second psychiatrist to come and
25 evaluate her. The second psychiatrist came and evaluated her and made the same finding that the
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1 first psychiatrist did and that was that First Joint Petitioner/Plaintiff was just too emotional
2 because she simply wanted to see her children and go back home. While all this was going on,
3 First Joint Petitioner/Plaintiff's children were still in town to see and visit with her. So, after the
4 Ex-Temporary Co-Guardians could not get First Joint Petitioner/Plaintiff committed as they tried
5 desperately to do, they decided to move her from house to house to conceal her whereabouts
6 from her children.
7

8 When the Ex-Temporary Co-Guardians had First Joint Petitioner/Plaintiff
9 evaluated with Dr. Ann Prather in Arkansas so that they could get an evaluation submitted for
10 their Ex-Temporary Co-Guardianship, they filled out all of her intake paperwork for her and
11 would not let her complete any of it. They checked "no" on boxes in which they should have
12 checked "yes". They wrote down stuff that she could do but wrote down that she couldn't do it
13 anyways. They misrepresented the truth to the doctor when she interviewed the Ex-Temporary
14 Co-Guardians so that First Joint Petitioner/Plaintiff could get the lowest score possible. They told
15 First Joint Petitioner/Plaintiff "to be stupid and play dumb" so that she could get the lowest score
16 possible so that they would be able to obtain guardianship of her.
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18 Is this how temporary guardians normally treat their ward let alone their own
19 daughter? The Ex-Temporary Co-Guardians can no longer continue to ignore and deny the facts
20 and their wrongdoing towards First Joint Petitioner/Plaintiff. Their hubris and superciliousness
21 behavior is incomprehensible and unconscionable. Their pomposity is shocking.
22

23 Finally, when First Joint Petitioner/Plaintiff was between the ages of 16-18 and
24 still a minor child, Ex-Temporary Co-Guardian (Robert Crawford who is her stepdad), would go
25 into her room late at night and sexually assault her on many occasions. The sexual assaults were
26 reported to police and a police investigation was conducted, but later dropped after the Ex-
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28 SECOND SUPPLEMENT TO THE MOTION FOR RECONSIDERATION - 10

1 Temporary Co-Guardians moved to the state of Arkansas. We believe that the move to Arkansas
2 was done primarily to avoid prosecution from such investigation. We are in the process of
3 obtaining the police reports and a copy of the investigation to produce to the court for its review
4 and inspection. After the Ex-Temporary Co-Guardians relocated to the state of Arkansas, First
5 Joint Petitioner/Plaintiff and Second Joint Petitioner/Defendant became estranged to them
6 because of the sexual assaults committed against First Joint Petitioner/Plaintiff by Ex-Temporary
7 Co-Guardian, Robert Crawford. Mr. Crawford should be extremely ashamed of himself for the
8 conduct that he perpetrated towards First Joint Petitioner/Plaintiff while she was still a minor and
9 vulnerable child.
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13 **IV. THE COURT DID NOT USE ANY OF THE BRUNZELL**
14 **FACTORS IN DETERMINING ATTORNEY FEES**
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16 The Nevada Supreme Court reviews a district court's award of attorney fees for
17 an abuse of discretion. See **Miller v. Wilfong**, 121 Nev. 619, 622, 119 P.3d 727, 729 (2005)
18 *Parties* seeking attorney fees in a family law case "must support their fee request with affidavits
19 or other evidence." *Id.* at 624, 119 P.3d at 730. After determining that an award of attorney fees
20 has a *legal basis*, the district court must use the factors in **Brunzell v. Golden Gate National**
21 **Bank**, 85 Nev. 345, 455 P.2d 31 (1969), to determine the amount. See **Miller**, 121 Nev. at 623,
22 **119 P.3d at 730**. Here in this case, the district court ordered attorney fees without making the
23 findings required by *Brunzell*. Nothing in the record indicates that the Un-Registered Ex-
24 Temporary Co-Guardians filed a *Brunzell* motion or affidavit to support their financial request.
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27 Generally, a district court may not award attorney fees unless they are authorized
28 by a statute, rule, or contract. See **Davis v. Beling**, 128 Nev. 301, 321, 278 P.3d 501, 515 (2012).

1 There is no statute, rule, or contract that authorizes attorney fees to be paid to non-parties in
2 family law cases. There is no legal basis or legal justification for it, and it is unprecedented.
3 Furthermore, when determining the amount of fees to award, the district court must consider the
4 factors articulated in **Brunzell v. Golden Gate National Bank, 85 Nev. 345, 349, 455 P.2d 31,**
5 **33 (1969).** Once again, the district did not utilize any of the *Brunzell* factors in determining the
6 award of attorney fees to be paid to the Un-Registered Ex-Temporary Co-Guardians.
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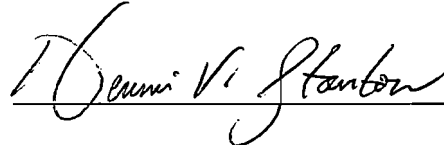
8 In family law cases, the court must also consider the disparity in the *parties'*
9 respective incomes. See **Miller, 121 Nev. at 623, 119 P.3d at 730 *Id.*** Here in this case, the Un-
10 Registered Ex-Temporary Co-Guardians did not file a Financial Disclosure Form when seeking
11 financial relief. Nor did the district court take into account Second Joint Petitioner/Defendant's
12 income compared to that of the Un-Registered Ex-Temporary Co-Guardians. It is believed that
13 the Un-Registered Ex-Temporary Co-Guardians have an estimated annual income and assets of
14 between 3 to 5 million dollars annually based on the selling of 3 successful businesses, the
15 receiving of multiple pensions, stocks and bonds, numerous rental properties, and while still
16 continuing to earn and receive a regular paycheck till this day for fixing airplanes while only
17 having to support both of themselves. Yet Second Joint Petitioner/Defendant has an annual
18 income of about on average of \$60,000 annually whom he supports 2 adults and 7 children with.
19 In family law cases, the court must consider the disparity in the *parties'* respective incomes, and
20 the record reflects that no such thing was done. The disparity of incomes between Second Joint
21 Petitioner/Defendant (\$60,000 annually) versus the Un-Registered Ex-Temporary Co-Guardians
22 (3 to 5 million dollars annually) is enormous and astronomical.
23
24
25
26
27
28

V. CONCLUSION

1 Accordingly, and based on all of the foregoing reasons, Second Joint
2 Petitioner/Defendant herein and hereby requests that this court grant the Motion for
3 Reconsideration in its entirety.
4

5 DATED this 07th day of February, 2020.

6 DENNIS VINCENT STANTON

7
8 
9

10 DENNIS VINCENT STANTON

11 7088 Los Banderos Avenue

12 Las Vegas, Nevada 89179-1207

13 Telephone (702) 764-4690

14 dennisvstanton30@gmail.com

15 In Proper Person
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Stanton, declare under penalty of perjury that a true and correct copy of this **SECOND**

SUPPLEMENT TO THE MOTION FOR RECONSIDERATION was emailed to

the following email address as agreed upon by the parties pursuant to NRCP 5(b)(2)(D):

twylamstanton24@gmail.com

DENNIS VINCENT STANTON

FILED
FIFTH JUDICIAL DISTRICT

JAN 13 2021

Nye County Clerk
Deputy
Sarah Westfall

1 CASE NO. CV 39304

2 DEPT NO. 2

3
4 IN AND FOR THE FIFTH JUDICIAL DISTRICT COURT

5 COUNTY OF NYE, STATE OF NEVADA

6
7 TWYLA MARIE STANTON,

8 Plaintiff,

9 vs.

10 DENNIS VINCENT STANTON,

11 Defendant.

CERTIFIED
TRANSCRIPT

)
)
)
) All Pending
) Motions
)
)
)
)

12
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14
15 BEFORE THE HONORABLE ROBERT W. LANE, DISTRICT COURT JUDGE

16 1520 EAST BASIN AVENUE, PAHRUMP, NEVADA 89060

17
18 TRANSCRIPT OF ELECTRONICALLY RECORDED PROCEEDINGS

19
20 ON MONDAY, FEBRUARY 10, 2020

21 AT 9:10 A.M.

22
23
24
25 Transcribed by: Deborah Ann Hines, CCR #473, RPR

1 Appearances:

2 For Twyla McCurdy, Plaintiff, by Guardians Robert
3 Crawford and Carmen Crawford:

4 ROBERT CRAWFORD, PRO SE
5 (Via CourtCall)

6 For the Defendant:

7 DENNIS VINCENT STANTON, PRO SE
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1 MONDAY, FEBRUARY 10, 2020

2 ---oOo---

3 THE COURT: Stanton, 39304. Is Twyla on the
4 phone?

5 THE LAW CLERK: (Inaudible).

6 THE COURT: The grandparents.

7 MR. CRAWFORD: No, her dad is.

8 THE COURT: Okay.

9 THE DEFENDANT: Your Honor, she filed a
10 notice of intent to appear telephonically. She's
11 called the court (inaudible) so...

12 THE COURT: We've read all your briefs. Is
13 there anything you'd like to add to what's in your
14 briefs?

15 THE DEFENDANT: Well, yeah, there's a lot.
16 Let me -- well, you know, it's my motion, my motion
17 for reconsideration. Well, let me -- I'm Dennis
18 Stanton. I'm the first one, petitioner plaintiff,
19 and I'm here proper person. And I do want to make
20 some points.

21 As you know, I've, I've filed a motion for
22 reconsideration to alter the judgment under Rule
23 59(e).

24 And my first point is the unsealing of the
25 court record without first being served. I'm showing

1 here that no notice was given to me or Mrs. Stanton
2 regarding the unsealing of the court record. The
3 record will reflect that on November 20th, 2018, the
4 unregistered ex-temporary co-guardians submitted an
5 ex parte request motion to unseal the court record
6 without notice to me or Mrs. Stanton.

7 And part 7, which is the rules governing the
8 sealing and redact of court records, the rule 4
9 states the process for unsealing the court records.
10 Part 2, motion; service, it says a seal of court
11 record in a civil case shall be unsealed only upon
12 stipulation of all the parties, upon the court's own
13 motion, or upon a motion filed by a named party or
14 another person. A motion to unseal a court record
15 must be served on all parties to the action in
16 accordance with Nevada Rule of Civil Procedure 5.

17 I was never served, and neither was
18 Mrs. Stanton. The record will reflect that, that I
19 wasn't served. And by not being served, I was
20 prejudiced by it, because if I had received notice of
21 the unsealing of a court record, I could have filed
22 an opposition to that motion. But if you look at the
23 record, I wasn't served.

24 My second point is the divorce cannot be
25 attacked by third parties, and that's what we have

1 here. And it says -- it says NRS 125.185, valid
2 divorce in Nevada is not subject to contest or attack
3 by third persons not parties to the divorce
4 specifically states, "No divorce from the bonds of
5 matrimony heretofore or hereafter granted by a court
6 of competent jurisdiction of the State of Nevada,
7 which divorce is valid and binding upon each of the
8 parties thereto, may be contested or attacked by
9 third persons not parties thereto."

10 So, I mean, to me, I mean the law is crystal
11 clear on that. And that's what we have here is we
12 have third parties from the state of Arkansas
13 contesting and attacking a decree that was validly
14 issued in the state of Nevada. You know, it was --
15 it was our intent to get married on July 11, 2004.
16 It was also our intent to get divorced on June 7,
17 2018. And it was our intent to remarry on
18 December 14, 2018.

19 My first point is that I was prejudiced by
20 not having the motion to set aside hearing continued
21 to determine the true status of the unregistered
22 ex-temporary co-guardianship. On December 13, 2018,
23 as the record will reflect, I filed an ex parte
24 motion for a continuance in order to continue the
25 hearing so that the unregistered ex-temporary

1 co-guardianship could be determined. Had the motion
2 to continue been granted, the court would have seen
3 that the unregistered ex-temporary co-guardianship
4 would have been dismissed and that the permanent
5 guardianship would not have been granted.

6 My fourth point is that the unregistered
7 ex-temporary co-guardianship was not registered in
8 the state of Nevada as was required by law. So under
9 NRS 159.2025 it provides a registration of a
10 guardianship orders issued in another state, and none
11 of that was done. They never notified the court in
12 Arkansas what their true intent was in obtaining the
13 guardianship. They never registered here, they never
14 set a hearing. None of that was done. So because
15 the guardianship was not registered here, they lacked
16 merit to bring a 60(b) motion, and they lacked
17 standing and to do so.

18 My fifth point is the perpetration of a
19 fraud upon the court. So the court made findings of
20 fact, conclusions of law, and orders are being
21 perpetrated and brought upon the court without
22 holding an evidentiary to determine such after the
23 court stated twice on the record that it would need
24 an evidentiary to make that determination.

25 So now on the other side of that there was

1 never a fraud perpetrated upon the court, rather it
2 was just a decree of divorce that was mutually agreed
3 upon by two consenting adults who were just trying to
4 obtain a divorce as least expensively as possible and
5 at the most efficient and convenient way available by
6 way of a joint petition for divorce.

7 My sixth point is that there was a former
8 client conflict of interest here. So, you know, the
9 Nevada Rules of Professional Conduct, Rule 1.9, duty
10 to former clients states in part, "A lawyer who has
11 formerly represented a client in a matter shall not
12 thereafter represent another person in the same or a
13 substantially related matter in which that person's
14 interest are materially adverse to the interests of
15 the former client unless the former client gives
16 informed consent, confirmed in writing."

17 And Mrs. Stanton never gave Mr. LoBello,
18 Mr. Owen from the Owen Law Firm informed consent
19 confirmed in writing for them to represent parties
20 that she was directly at -- that were directly
21 adverse from her regarding guardianship.

22 And not only did they, did they involve
23 themselves in a former client conflict of interest,
24 but then they also used information that was aimed in
25 their prior representation of Mrs. Stanton in a

1 disadvantaged way against her, not -- I know Judge
2 Hughes' minute order, that's what they used was Judge
3 Hughes' minute order, and that was not part of the
4 public record. That was not publically available and
5 it was not generally known.

6 And my next point is the sanctions. If you
7 look at the rule, the rule says on the sanctions that
8 a motion for sanctions must be made separately from
9 other motions. That was not done.

10 Next, if the motion is made separately from
11 other motions, it must have been given to me 21 days
12 prior before it's filed with the court. That was not
13 done. Now, the court can order sanctions on its own
14 initiative, but it must issue an order to show cause
15 and have an order to show cause hearing to determine
16 that, and that wasn't done. So the ruling on
17 sanctions were not done according to law or rule.

18 Now, my next point is that a district court
19 may not award attorney fees unless they are
20 authorized by statute, rule or contract. See Davis
21 versus Beling. It's a 2012 Nevada case. There was
22 no statute, rule or contract that authorizes attorney
23 fees to be paid to nonparties in family law matters.
24 There's no legal basis for it. There's no legal
25 justification. And it's unprecedented. This is a

1 case of first impression. I researched and I
2 couldn't find one case where parties were, in a
3 family law cases in the state of Nevada where
4 attorney's fees were issued to that, to the nonparty.

5 Now, my next point is that after determining
6 that an award of attorney fees has a legal basis, the
7 district court must use factors in Brunzell versus
8 Golden Gate National Bank to determine the amount.
9 Here in this case attorney fees were ordered without
10 making a findings required by Brunzell. Nothing in
11 the record indicates the unregistered ex-temporary
12 co-guardians filed a Brunzell motion or affidavit to
13 support their factual request.

14 My next point is that the court did not take
15 into account the disparity of the incomes between
16 myself and the unregistered ex-temporary
17 co-guardians. In family law cases the court must
18 also consider the disparity in the parties'
19 respective incomes. See Miller. It's a Nevada case.
20 They also didn't file a financial disclosure form
21 when seeking financial assistance.

22 Now, it is believed that, that the guardians
23 has an estimated income of assets -- income and
24 assets of between 3 to \$5 million. And I put that in
25 my, in my supplement, and I have an average income of

1 about \$60,000 annually. So there's a big disparity
2 of income between the ex-temporary co-guardians and
3 myself.

4 Now, my next point is that the evidence or
5 affidavits and the relief sought, you know, there's
6 no verifications. There's no affidavit. There's
7 no -- there's no witness testimony. There's no
8 evidence. You know, there's nothing that they've
9 established in the record that verifies what they put
10 in their motion is true or correct.

11 Now -- now I want to talk about the conduct
12 of the ex-temporary co-guardians towards
13 Mrs. Stanton. And when -- what they did was, as she
14 was in Arkansas, they took her service from her
15 regarding her guardianship hearing, so that way she
16 wouldn't appear at the guardianship hearing. They
17 stole \$62,400 from Mrs. Stanton regarding her dad's
18 social security death benefit that they said they
19 were going to save for her and give it to her when
20 she left the housing, and they never did that.

21 They prevented her from seeing her children
22 while they were in town to visit her. They kept
23 moving her from house to house and taking, and taking
24 off the house numbers of the places that they took
25 her so that she didn't know where she was at. They

1 prevented her from speaking or seeing her
2 guardianship attorney.

3 You know, also an investigation was opened
4 and being conducted by the Arkansas protective
5 services regarding the treatment of how they treated
6 her. I wasn't able to get that report. You know,
7 they sent her -- harassed via text messages. You
8 know, they were -- I mean, there's other stuff here,
9 but I just want to go to my next point.

10 Now, there was never an intent to fail to
11 misinform the court regarding multiple proceedings
12 that preceded the Nye County filing. If you look at
13 the joint petition for divorce that was filed here,
14 we utilized self help fill-in-the-blank forms and
15 they didn't ask or inquire of participation in other
16 cases, knowledge of other cases and other
17 considerations. If it did we would have put that
18 there, but it didn't. So it's not the fact that we
19 failed to misinform the court regarding prior
20 filings, it's just it didn't ask for it.

21 My next point is that the unregistered
22 ex-temporary co-guardians are not parties to this
23 action. They haven't been named. They haven't been
24 served. They haven't even filed a proper motion to
25 intervene. There is no guardianship. They are not

1 parties. So -- so I don't understand how they could
2 just come in and all of a sudden file a motion to set
3 aside our divorce when they were never part of the
4 marriage or the divorce.

5 Another thing that I found concerning was
6 that nowhere in the court record for the court
7 hearing that was on January 7, 2019 did it state that
8 the sanctions were reduced to judgment plus
9 postjudgment interest at the applicable daily rate of
10 judgement interests. There is no mention of that in
11 the record or in the transcript of the January 7,
12 2018 hearing, but then in the judgement and order it
13 was reduced to judgement plus interest. That was
14 never discussed at the hearing.

15 That's -- that's pretty much all I have for
16 right now. I'm sure other stuff will come up.

17 THE COURT: Thank you. Is there anything
18 the grandparents would like to add?

19 MR. CRAWFORD: Yes. That as far as my
20 assets that he had declared is a lie. I'm a disabled
21 veteran.

22 THE COURT: All right. Anything else?

23 MR. CRAWFORD: And my -- and the other thing
24 as far as the death benefits, that was also a lie.

25 THE COURT: All right.

1 MR. CRAWFORD: Actually pretty much
2 everything he's saying is a lie.

3 THE COURT: Okay. You made a lot of points.
4 We'll take them under consideration and issue our
5 ruling in the next week or so.

6 THE DEFENDANT: Okay.

7 THE COURT: Thanks for coming in today. Oh,
8 by the way, are you guys remarried now? Are you
9 married?

10 THE DEFENDANT: Yeah, we've been remarried.

11 THE COURT: Okay. And you're living
12 together?

13 THE DEFENDANT: We're living together.

14 THE COURT: All right. Thank you for coming
15 in. We'll have our decision for you shortly.

16 THE DEFENDANT: Okay. Thank you.

17 THE COURT: Thank you.

18 (Thereupon the proceedings
19 were concluded at 9:27 a.m.)

20 * * * * *

CERTIFICATE OF TRANSCRIBER

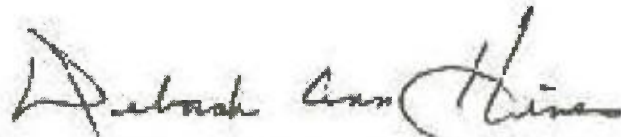
STATE OF NEVADA)

SS:

COUNTY OF CLARK)

I, Deborah Hines, do hereby certify that I listened to the recorded proceedings had in the before-entitled matter; that I thereafter transcribed said tapes into a typewritten transcript and that the typewritten transcript of said proceedings is a full, true and accurate record of the proceedings to the best of my ability to hear and understand the recording.

IN WITNESS WHEREOF, I have hereunto affixed my hand this 11th day of January, 2021.



Deborah Ann Hines, CCR #473, RPR

FEB 28 2020

Case No. CV 39304
Dept. 2P

Nye County Clerk
Deputy

IN THE FIFTH JUDICIAL DISTRICT COURT OF THE
STATE OF NEVADA, IN AND FOR THE COUNTY OF NYE

TWYLA MARIE STANTON,
Plaintiff/First Joint Petitioner,

vs.

DENNIS VINCENT STANTON,
Defendant/Second Joint Petitioner.

COURT ORDER

The parties were married on July 7, 2004. As shown below, the parties have engaged in multiple filings to obtain a divorce. This Court granted a divorce on June 7, 2018. On November 27, 2018, a Motion Pursuant to Rule 60(b) To Set Aside Decree of Divorce as Fraudulently Obtained, To Dismiss the Joint Petition for Divorce with Prejudice, and to Sanction Defendant for Forum Shopping and Perpetrating a Fraud Upon the Court in the Full Amount of Plaintiff's Fees and Costs was filed. The parties then remarried on December 14, 2018. The Court set aside the divorce on March 18, 2019. On April 15, 2019, Petitioner filed a Motion for Reconsideration. A hearing was held on February 10, 2020. This Order follows.





I. CASE HISTORY

To increase ease of understanding of this matter, the case history is put forth in chronological order, and numbered by each separate action, discussed below.

1. Complaint for Divorce, Eighth Judicial District Court, filed October 12, 2016, and dismissed on March 30, 2017.
2. Complaint for Divorce, Eighth Judicial District Court, filed September 13, 2017, and dismissed on February 26, 2018.
3. Complaint for Divorce, Eighth Judicial District Court, filed March 29, 2018, and dismissed on May 17, 2018.
4. Complaint for Divorce, Fifth Judicial District Court, filed May 17, 2018, and granted June 7, 2018.
5. Petition for Guardianship of Twyla Stanton, Circuit Court of Faulkner County, Arkansas Probate Division, 5th Division, temporary granted October 26, 2018.
6. Motion to Set Aside Divorce of item 4 above, Fifth Judicial District Court, filed November 27, 2018.
7. Parties Remarried, Las Vegas NV, December 14, 2018.
8. Order to Set Aside Divorce of item 4 above, Fifth Judicial District Court, granted March 20, 2019.
9. Motion for Reconsideration filed by Petitioner, Fifth Judicial District Court, April 15, 2019.
10. This Order follows Denying Motion for Reconsideration, Fifth Judicial District Court, February 28, 2020.

1. On October 12, 2016, Mr. Dennis Stanton ("Dennis") filed a Complaint for Divorce in the Eighth Judicial District Court, Case No. D-16-540966-D. The case was assigned to Judge Rena Hughes. Also on October 12, 2016, Mrs. Twyla Stanton ("Twyla") filed a Complaint for Divorce against Dennis in the Eighth Judicial District Court, Case No. D-16-541006-D. This case was also assigned to Judge Hughes. Cases D-16-540966-D and D-16-541006-D were consolidated. Over the next several months, Judge Hughes presided over multiple motion hearings and made numerous substantive rulings on



1
2 contested matters in the case. Pursuant to a Stipulation, on March 30, 2017, Judge Hughes
3 entered an Order dismissing both cases.

4 **2. On September 13, 2017,** Dennis filed a Complaint for Separate Maintenance in
5 the Eighth Judicial District Court, Case No. D-17-558626-S, wherein Dennis sought
6 maintenance from Twyla, who was at that time, and still remains, unemployed. Pursuant
7 to E.D.C.R. Rule 5.103 the case was again assigned to Judge Hughes. On January 31,
8 2018, Dennis filed a Notice of Voluntary Dismissal.

9
10 On February 1, 2018, in the Court's Minute Order, Sua Sponte, Judge Hughes
11 stated *"the Court is aware that [Twyla] has a diminished mental capacity and lacks the*
12 *ability to comprehend legal documents or make judgments as to legal matters. In good*
13 *conscience, and for purposes of due process, the Court cannot approve [Twyla's] alleged*
14 *agreements with [Dennis] until [Twyla] receives independent legal counsel."* (emphasis
15 added).

16
17 On February 12, 2018, Judge Hughes appointed Twyla counsel of the Owen Law
18 firm.

19 On February 26, 2018, pursuant to a Stipulation which was not signed by appointed
20 counsel, Judge Hughes entered an Order dismissing the case.

21 **3. On March 29, 2018,** the parties filed a Joint Petition for Divorce in the Eighth
22 Judicial District Court, Case No. D-18-568604. The matter was assigned back to Judge
23 Hughes pursuant to E.D.C.R. Rule 5.103. A Peremptory Challenge was filed by Twyla on
24 the same day. The case was then reassigned to Judge Bryce Duckworth who denied the
25



1
2 peremptory challenge and ordered reassignment of the matter back to Judge Hughes on
3 April 18, 2018. In the minute order of the Court Judge Duckworth provided:

4 The parties to litigation are not permitted to file a peremptory challenge against a
5 district judge who has previously made rulings on contested issues. This
6 prohibition applies in any subsequent cases between the same parties, which are
7 assigned to that same district judge pursuant to a local case assignment rule.
8 "Allowing a plaintiff to file a peremptory challenge after the filing of any
9 counterclaim would give a plaintiff the opportunity to disqualify the district judge
10 simply because he has made previous unfavorable rulings." [Citations omitted]...

11 The cause of action and issues in this case are identical to those in cases D-16-
12 541006-D and D-16-540966-D because they are both actions for divorce. Had
13 either of these earlier cases resulted in a decree of divorce, the instant case would
14 have been barred under the principle of res judicata. The cause of action and issues
15 in this case are substantively indistinguishable from those in case D-16-558626-S
16 because of the natural overlap between divorce and separate maintenance cases.
17 Should that case have resulted in a decree of separate maintenance, the instant case
18 would not have been barred under res judicata; however, the principle of collateral
19 estoppel would have been dispositive for all issues in the divorce action except
20 whether the parties are incompatible.

21 The general prohibition against forum shopping between district judges prohibits a
22 party from filing a peremptory challenge under the circumstances detailed above.

23 Therefore, under these circumstances, the Court concludes that the peremptory
24 challenge filed by Twyla Stanton on March 29, 2018 is untimely under Nevada
25 Supreme Court Rule 48.1(3) because it was not filed 3 days prior to a contested
26 hearing. Additionally, the Court concludes that the peremptory challenge is
27 prohibited by SCR 48.1(5) because it was filed against a district judge that has
28 made rulings on contested issues between the parties.

On May 17, 2018, the matter was voluntarily dismissed through a stipulation and order.

4. Also on May 17, 2018, Petitioners filed in the Fifth Judicial District Court a
Joint Petition for Summary Decree of Divorce, the case at bar, CV 39304. The document
was verified by both parties. A letter was sent to both parties regarding the Joint Petition
for Summary Decree of Divorce because it sought sole legal custody, which is typically



not granted by this Court without a hearing, though a hearing to grant joint legal custody would not be required with an amended joint petition. On June 5, 2018, an Amended Joint Petition for Summary Decree of Divorce was filed, again verified by the petitioners. In pertinent part, the Amended Joint Petition for Summary Decree of Divorce provided that:

- Parties had six children together, who are residents of Nevada
- That the Petitioners should be granted joint legal custody of the minor children
- Husband to get primary physical custody of the children, while Wife had the children every other weekend from Friday at 6:00 p.m. to Monday at 3:00 p.m., and every other Thursday night from 5:00 p.m. to 8:00 p.m.
- A holiday visitation schedule was also proposed.
- That Wife should maintain medical and dental insurance for the minor children.
- Parties to adopt the 30/30 rule
- That child support would be paid by Twyla in the amount of \$1,517.00 a month, which was based on income of \$4,333.33 a month.
- Petitioners requested a wage withholding against the obligor parent.
- Petitioners agreed that the husband should be awarded child support arrears in the total amount of \$4,551.00.
- That there was a division of property and a division of debts.
- That there was to be no spousal support.
- That the wife would have her former name of McCurdy restored.

The Decree of Divorce was filed on June 7, 2018. On July 5, 2018, Petitioner Twyla Stanton filed an Ex Parte Application to Seal File which was signed on July 9, 2018.

The Court was unaware of the Clark County filings listed 1-3 above when it granted this divorce.

5. On October 26, 2018, in the Circuit Court of Faulkner County, Arkansas Probate Division, 5th Division, the Honorable H.G. Foster signed an Order Appointing Temporary Co-Guardians of the Person and Estate for Petitioner's Robert Crawford and



1
2 Carmen Crawford over Twyla Marie McCurdy. A Petition for Appointment as Co-
3 Guardians had also been filed in the matter. Twyla, through counsel, Ron Goodman, filed
4 a Response to the Petition for Appointment of Co-guardians on December 6, 2018, and
5 motioned the Court to continue the final hearing scheduled for December 10, 2018.

6
7 On November 20, 2018, counsel at the Owen Law Firm, on behalf of Twyla Marie
8 Stanton, filed an Ex Parte Request for Submission of Ex Parte Application to Unseal Court
9 Record. Attached as an exhibit to the petition was an Order Appointing Temporary Co-
10 Guardians of the Person and Estate. An Order to Unseal Court Record was filed on
11 November 28, 2018.

12 **6. On November 27, 2018,** Twyla's counsel filed a Motion Pursuant to Rule 60(b)
13 To Set Aside Decree of Divorce as Fraudulently Obtained, To Dismiss the Joint Petition
14 for Divorce with Prejudice, and to Sanction Defendant for Forum Shopping and
15 Perpetrating a Fraud Upon the Court in the Full Amount of Plaintiff's Fees and Costs. The
16 hearing on the motion was placed on calendar for January 7, 2019.

17
18 On December 13, 2018, Dennis filed an Ex Parte Motion to Extend the Time
19 Required to File a Written Response to the Motion. The Ex Parte Motion was denied on
20 December 14, 2018.

21
22 Dennis, through counsel, James S. Kent, Esq., filed his Opposition and
23 Countermotion to Strike Movant's Motion on December 26, 2018. In the motion, Mr.
24 Kent stated that he was only technically retained by Dennis, but that in reality the



1
2 Opposition was being filed on behalf and for the benefit of both named parties. Reply and
3 Opposition to counter motion was filed on January 2, 2019.

4 On January 4, 2019, Twyla, not through counsel, filed an Affidavit regarding the
5 signing and filing of the Decree of Divorce and Amended Joint Petition for Summary
6 Decree of Divorce, which appeared to be signed and notarized *back from June 18, 2018*.
7 Neither counsel was aware of this filing until the hearing when the Court informed them
8 about it.
9

10 On January 7, 2019, the hearing on the motion was held. Charles LoBello, Esq.,
11 and Christopher Owen, Esq., were present on behalf of Twyla Stanton and the temporary
12 co-guardians Robert Crawford and Carmen Crawford, and Dennis Stanton was present
13 with counsel, James S. Kent, Esq. Twyla was not present at the hearing. Through the
14 pleadings and argument at the hearing, the Court was *informed for the first time* of items
15 1, 2, 3, 5 and 7 above.
16

17 The following arguments were made:

18 Twyla's counsel argued that:

- 19
- 20 • The decree should be set aside pursuant to NRCP 60(b)(3) as fraudulently obtained
21 and the joint petition being dismissed.
 - 22 • That Twyla does not possess the requisite capacity to comprehend any of the
23 pleadings and papers filed in the action and a report from Dr. Prather regarding
24 Twyla's diminished mental capacity was provided.
 - 25 • That Plaintiff should be entitled to an award of attorney fees and costs pursuant to
26 NRS 18.010 and Rule 11 violations.
 - 27 • That even without registering the guardianship, the Court has authority under Rule
28 11 to address Dennis's misconduct.
 - That the motion was brought in good faith to meet the deadline in NRCP Rule
60(b) of six months.



- That there was sufficient evidence of Dennis's misdeeds even if no affidavit was provided by the temporary co-guardians.
- That there was no conflict of interest if Twyla does not understand the proceedings.
- That Dennis reconciled in the first divorce primarily to avoid having the court remove the children from his custody and having an award of attorney's fees leveled against him.
- That Dennis had used Twyla as a straw person to file peremptory challenge documents in Case No. D-18-568604.
- That the Amended Joint Petition for Summary Decree of Divorce in case CV 39304 somehow had agreement by Twyla to pay Dennis \$1,500.00 per month in child support, based on an alleged annual income of over \$52,000.00, when Twyla had not held a job since July 8, 2016.
- That Twyla did not have a job and she has had difficulties in the past holding even a minimum wage job.
- That past filings had varying child support payments based on an imaginary income and past arrearages.
- That the joint petition also contained other numerous material false statements such as
 - That Twyla even understood what she was signing and that the entire joint petition, besides Twyla's name and signature, was in Dennis's handwriting.
 - That it is obvious Dennis forum shopped.
 - That Twyla should be the party responsible for maintaining medical and dental insurance for the six children when she is not employed.
 - The claims regarding child support and the alleged annual income for Twyla, who is unemployed.
 - That Twyla would not knowingly agree for Dennis to have primary physical custody of the children.
 - That Twyla owes Dennis child support arrears in the amount of \$4,551.00 when she has no job or income.
 - That Twyla would receive 100% of Dennis's I.B.E.W. 357 Pension Trust Plan B. The evidence would show that Twyla received a check in the amount of \$36,176.00 and on August 9, 2018, it was believed to be deposited into her savings account at Bank of American. However, four days later, on August 13, 2018, it is believed that Dennis drove Twyla to the bank, ordered her to withdraw the funds in cash, and close the account. Dennis then allegedly took the cash.
 - That the decree awarded Dennis 100% of the parties' marital residence located at 7088 Los Banderos Ave., which had sixty thousand to one hundred thousand in equity.
 - That there was an entering of an equitable agreement and that no spousal support was appropriate even though the parties had been married 14 years.



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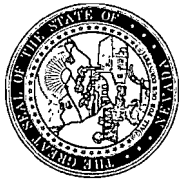
- That Dennis, after being denied a request for continuation of the hearing on January 7, 2019, withdrew the children from school, drove them to Arkansas, hired an attorney to contest the guardianship, brought Twyla back to Las Vegas, and hurriedly re-married her.

Dennis's counsel made arguments regarding:

- The motion should be stricken.
- That he technically represented Dennis but in reality the opposition was being filed on behalf of Mr. and Twyla.
- NRS 125.185 standing.
- The co-guardians not being parties to the divorce and that standing was only possible through the Order appointing them as temporary co-guardians.
- That Twyla had counsel challenging the guardianship.
- Guardians' authority pursuant to NRS 159.2025.
- That the motion contained no statement from the temporary co-guardians, and that the allegations were baseless.
- DCR 13 rules regarding affidavits and factual allegations made in the motion.
- That counsel for the Co-Guardians had been previously appointed as counsel for Twyla and that there was a direct conflict of interest.
- That the parties had since reconciled.

After oral argument, the Court issued its ruling granting the set aside.

8. On March 18, 2019, an Order and Judgment was filed granting the set aside of the divorce listed in item 4 above. Findings were made regarding the previous filings by the parties in the Eighth Judicial District Court and its history, the temporary guardianship, remarriage of the parties, and the subsequent unusual affidavit filed by Twyla. The Court found that Dennis engaged in or caused to be filed multiple divorces and/or separate maintenance actions; that he failed to advise the Court of these proceedings and the others Court's findings that Twyla had a diminished mental capacity, lacks the ability to comprehend legal documents, and is unable to make judgments as to legal matters; that based on the information, the previous court refused to approve the alleged



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2 agreements of the parties without first affording Twyla independent legal counsel; that
3 Dennis had made representations to the Clark County Family Court that Twyla earned
4 \$3,052.00 a month and should pay him \$1,300.00 in child support per month; that Dennis
5 made representations to this Court regarding Twyla's employment and earnings, falsely
6 representing that Twyla was earning \$4,333.33 per month, that she should pay Dennis
7 child support of \$1,517.00 per month, and that she owed Dennis arrears of \$4,551.00; that
8 the totality of the circumstances shocked the Court as to Dennis's conduct over the past
9 few years; that Dennis's serial filings and further actions were consistent with the
10 perpetration of a fraud upon this Court; that James S. Kent, Esq., had nothing to do with
11 Dennis's past fraudulent conduct and representations; and that based upon review of the
12 record, arguments of counsel, and the totality of circumstances, Dennis's conduct was and
13 is in direct violation of NRCP 11(b)(1) and was further in violation of NRCP 11(b)(3).

14
15 The Court ordered the following

- 16
- 17 • That the motion to set aside be granted.
 - 18 • That the Joint Petition for Divorce filed in Nye County, Case No. CV-39304, on
19 May 17, 2018, be dismissed with prejudice.
 - 20 • That the Decree of Divorce filed and entered in Case No. CV-39304, on June 7,
21 2018, is set aside in its entirety and is of no force and effect and shall not be given
22 full faith and credit by any other State or Federal court or agency.
 - 23 • That so long as the Eighth Judicial District Court in Clark County, Nevada shall
24 have jurisdiction of any further, future filings for divorce or separate maintenance
25 by either or both of the parties hereto, that should there be any further, future filings
26 for divorce or separate maintenance, whether by one or both parties, these shall be
27 filed in Clark County, Nevada, and that it shall be considered the further
28 perpetration of a fraud upon the Court should a future filing for divorce or separate
maintenance be made anywhere other than Clark County, Nevada.
 - That Dennis be sanctioned for violations of NRCP Rule 11(b)(1) and 11(b)(3), and
shall pay the temporary co-guardians \$3,000.00 as for their attorney's fees.



- That the temporary co-guardians are awarded judgment against Dennis, in the amount of \$3,000.00, plus post-judgment interest.
- That counsel James S. Kent, Esq., did not act in any manner that may be construed as assisting the Defendant in perpetrating a fraud upon the court.
- That the countermotion to strike movants motion was denied.

Notice of Entry of Order and Judgment was filed on March 20, 2019. On March 21, 2019, the Owen Law Firm provided its Notice of Withdrawal of Counsel.

9. On April 15, 2019, Dennis filed a Motion for Reconsideration. The guardians of Twyla were not noticed of this motion. On April 16, 2019, Dennis filed a Notice of Appeal. On April 17, 2019, Twyla filed a Notice of Cross-Appeal. On May 1, 2019, Dennis filed an Ex Parte Motion for “Stay” Execution of the Judgment/Sanction, which was set for hearing on June 10, 2019. On May 10, 2019, Twyla filed a Notice of Non-Opposition to Second Joint Petitioner/Defendant’s Motion for Reconsideration. Dennis filed a Supplement to the Motion for Reconsideration on May 10, 2019. A Stipulation and Order to Continue the Hearing was signed by Mr. and Twyla on May 8, 2019, and the hearing was continued through the Order filed on May 13, 2019, to June 10, 2019. James Kent, Esq., filed Notice of Withdrawal as Attorney of Record for Dennis on May 17, 2019.

On June 5, 2019, Dennis filed a Motion to Disqualify Judge Lane. On June 10, 2019, Dennis filed a Reply to Notice of Non-Opposition to Motion for Reconsideration. At the hearing on the Motion for Reconsideration on June 10, 2019, Dennis was present and Mr. Crawford, the former guardian of Twyla, was present telephonically. Twyla was not present. Due to the motion to disqualify, the Court did not issue any orders other than

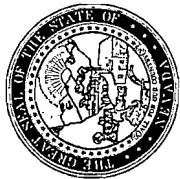


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2 reassignment for Judge Kimberly Wanker to resolve the issue. Judge Lane filed an
3 Affidavit on June 12, 2019, regarding Dennis's Motion to Disqualify. On July 5, 2019, an
4 Opposition to Motion for Reconsideration was filed by Robert and Carmen Crawford.
5 Dennis filed a Reply to Judge Lane's Affidavit on July 11, 2019. On July 19, 2019, Twyla
6 filed a Notice of Non-Opposition to the Motion to Disqualify Judge Lane. On October 1,
7 2019, Judge Kimberly Wanker issued an Order Denying Second Joint
8 Petitioner/Defendants' Motion to Disqualify the Honorable Robert W. Lane.
9

10 A hearing on the pending motions was set for February 10, 2020, and the
11 Petitioners were ordered to be present.

12 On February 4, 2020, the Court received two stipulations from the parties, one to
13 try and continue the hearing on February 10, 2020, and the other being a stipulation to
14 reinstate the Amended Joint Petition for Divorce filed on June 7, 2018, and the Decree of
15 Divorce granted on June 7, 2018. The Court did not sign either Stipulation.
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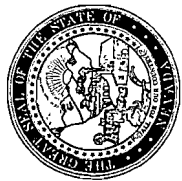
17 On February 7, 2020, Dennis filed a Second Supplement to the Motion for
18 Reconsideration. On the afternoon of the Friday before the hearing, February 7, 2020,
19 Twyla filed a Notice of Intent to Appear by Communication Equipment. The Court does
20 not use these forms to allow telephonic communication, and Twyla was informed that she
21 must appear in person for the hearing. **At the hearing on the Motion for**
22 **Reconsideration held on February 10, 2019**, Twyla was not present despite the Court
23 wanting her present. Dennis was present in person and Mr. Crawford was present
24 telephonically. Dennis indicated he was still married to Twyla.
25



II. DISCUSSION

Dennis argued for reconsideration of the order and requested for the following relief 1) for an Order reinstating the parties' Joint Petition for Divorce and Decree of Divorce filed on June 7, 2018; 2) for an Order that the Rule 11 Sanctions be eliminated; and 3) For an Order to strike the motion as being filed without authority. Dennis cites to NRCP 59(e) for relief as a Motion to Alter or Amend a judgment. Opposition by Mr. and Ms. Crawford argued the timeliness of the motion and that the fraud upon the court was undeniable.

A motion to alter or amend judgment under Rule 59(e) is "an extraordinary remedy which should be used sparingly." *McDowell v. Calderon*, 197 F.3d 1253, 1255 n. 1 (9th Cir.1999) (citation and quotation marks omitted). It is available in four "basic" situations: (1) where the motion is necessary to correct "manifest errors of law or fact upon which the judgment rests;" (2) where the motion is necessary to present newly discovered or previously unavailable evidence; (3) where the motion is necessary to "prevent manifest injustice;" and (4) where the amendment is justified by an intervening change in controlling law. *Allstate Insurance Co. v. Herron*, 634 F.3d 1101, 1111 (9th Cir.2011). Since Rule 59(e) does not itself provide standards for granting or denying a motion to alter or amend, "the district court enjoys considerable discretion in granting or denying the motion." *Id.* (citations and quotation marks omitted). Yet the Rule 59(e) motion may not be used to "relitigate old matters, or to raise arguments or present evidence that could have



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2 been raised prior to the entry of judgment.” 11 Charles Alan Wright et al., *Federal*
3 *Practice and Procedure* § 2810.1 (2d ed. 1995). Finally, amendment of the judgment will
4 be denied if it would serve no useful purpose. *Id.*

5 The Nevada Supreme Court has determined that “[o]nly in very rare instances in
6 which new issues of fact or law are raised supporting a ruling contrary to the ruling already
7 reached should a motion for rehearing be granted.” *Moore v. City of Las Vegas*, 92 Nev. 402,
8 405, 551 P.2d 244, 246 (1976). Additionally, a district court may consider a motion for
9 reconsideration concerning a previously decided issue if the decision was clearly erroneous.
10 *Masonry and Tile v. Jolley, Urga & Wirth*, 113 Nev. 737, 741, 941 P.2d 486, 489 (1997).
11 “Points or contentions not raised in the original hearing cannot be maintained or considered
12 on rehearing.” *Achrem v. Expressway Plaza Ltd.*, 112 Nev. 737, 742, 917 P.2d 447, 450
13 (1996).
14

15 In Dennis’s initial Motion for Reconsideration he reargues the deficiencies in the
16 guardianship, lack of affidavit, and registration of guardianship; that the divorce cannot be
17 contested by third persons not parties thereto; and that the conflict of interest was more
18 wide ranging. Dennis also argues that Judge Hughes’ minute order was not part of the
19 public record; that there was never an intent to fail to misinform the Court about multiple
20 proceedings; that Twyla knew exactly what she was doing; that Rule 11 sanctions were not
21 in accordance with Nevada Law; and that the ex-temporary co-guardianship was not
22 established for Twyla’s best interest.
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2 Dennis's additional supplements were not authorized by the Court, but the Court
3 will note them for the record. These supplements, however, do not provide any additional
4 facts or argument that would warrant relief. In the supplement filed on May 10, 2019, he
5 argues that there was never a fraud perpetrated upon the court and issues with the written
6 order and judgment. In his second supplement, filed on February 7, 2020, he reargues the
7 standing of the co-guardians; the conduct of the co-guardians with Twyla, and the lack of
8 *Brunzell* factors in determining attorney fees.
9

10 Dennis's argument to allow him relief under NRCP 59, as stated in his initial
11 motion, was because Dennis's "Opposition and Countermotion to the Motion to set aside
12 was largely a legal brief derived from the Nevada Revised Statutes, Procedure, and Rules
13 rather than a factual based Opposition and Countermotion."
14

15 After reviewing the file, and finding that reconsideration is not appropriate, the
16 Court finds it appropriate to briefly characterize the Order after the hearing. After the
17 motion to set aside was filed, it became obvious that there was a large history between the
18 parties and the courts that was not disclosed to this Court. After full briefing and
19 argument, the record before the Court of the previous divorce matters and their minute
20 orders, peremptory challenges, and the timings of dismissal and refiling, clearly showed
21 forum shopping of the divorce and manipulation of the system. Further, concerns by Judge
22 Rena Hughes regarding Twyla's ability to understand the legal proceedings in Clark
23 County became another warning sign for this Court. Neither counsel was aware of Twyla
24 filing an affidavit which also worried the Court. Further, that the joint petition contained
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multiple averments, as outlined above, that are not in line with a party that is unemployed and made it obvious that there could be no confidence in the decree of divorce signed by the Court. The parties even remarried before the hearing could be held, and counsel for Dennis provided that Dennis was not opposed to vacating the Decree, Joint Petition, and any accompanying documents.¹ Curiously, after the hearing and order, Dennis, through his motion for reconsideration, wanted to reinstate the divorce and all of its terms.

Dennis's motion for reconsideration is unclear on what manifest errors of law or fact occurred, what newly discovered evidence was discovered that was not previously available, that the motion is necessary to prevent manifest injustice, or if there was an intervening change in the controlling law. It appears that Dennis is largely attempting to relitigate old matters, or to raise arguments or present evidence that could have been raised prior to the entry of judgment. While he may not have been satisfied with his counsel's strategy in opposing the motion to set aside, Dennis did not oppose the tactic until an adverse ruling. Further, the majority of Dennis's arguments could have been previously raised or presented and the record alone clearly spoke about the actions of Dennis in the case.

¹ The Court notes that there has been a disturbing pattern in all of the proceedings where Dennis and Twyla have stipulated to continuances or dismissal of the matter before an adverse order can be issued. Each dismissal was, within a few months, followed by a new divorce action or motion to obtain a new divorce favorable to Dennis. This also occurred at the latest hearing, where on February 4, 2020, only 6 days before the hearing, Dennis and Twyla submitted a stipulation to reinstate the joint petition and divorce and a stipulation to continue the hearing. The previous co-guardians were not noticed of either of these filings. There is also no indication that the co-guardians were noticed by Dennis of any of the subsequent motions, filings, or appeal.



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2 The deficiencies of the guardianship procedure and allegations of abuse are
3 irrelevant to the extent that Dennis is arguing the merits of the guardianship that were not
4 before this Court. The Arkansas Court issued an order dismissing the guardianship on
5 February 19, 2019, which appears to be the only new evidence that could have been raised
6 prior to the hearing. Further, the dismissal does not place any affirmative findings of fraud
7 and merely states the expiration of the temporary guardianship and guardianship matter
8 being dismissed. Dennis uses the dismissal and alleged fraud and abuse as arguments to
9 bolster his previous arguments regarding NRS 159 and NRCP 60. This is merely,
10 however, relitigating the previously decided issue, which as argued before, the Court has
11 broad powers under NRCP 11 to redress filings that violate NRCP 11(b). The record of
12 the previous divorce proceedings was sufficient to show forum shopping by Dennis and
13 grant the motion to set aside. To the extent that Dennis argues that the Court should not
14 have been aware of the other divorce proceedings, that argument is non sensible, lacks
15 merit, and would just help perpetuate any fraud on the court. As such, relief is not
16 warranted based on the fact that the guardianship had been dismissed.

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19 To the extent that Dennis argues that there was not a fraud perpetrated upon the
20 Court, the lack of intent to misinform, and that Twyla was aware of what she was doing,
21 these arguments could have been brought before the Court at the time of hearing. Dennis's
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2 additional supplementation does not change the characterization of the record itself and the
3 concerns of Twyla's ability to comprehend the legal consequences of her actions.²

4 Additionally the Court notes that granting Dennis's requested relief to reinstate the joint
5 petition and divorce is not appropriate as it would require the Court to readopt and reorder
6 the questionable findings for Twyla's income and support obligations.
7

8 Therefore, based upon the above, the Court issues the following order

9 **IT IS HEREBY ORDERED** that Dennis's Motion for Reconsideration filed on
10 April 15, 2019, is DENIED.

11 DATED this 28th day of February, 2020.

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14 District Court Judge

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24 ² The Court notes that Twyla has conveniently been unavailable for each hearing before this Court and only
25 provided documents that have been signed and notary stamped. Given the concerns about comprehension
26 and manipulation, there is no harm in assuring that Twyla has had independent counsel or an examination by
27 the Court before granting her agreement. On the other hand, if Twyla does not comprehend these documents
28 and manipulation is occurring, there is great harm in granting these agreements.



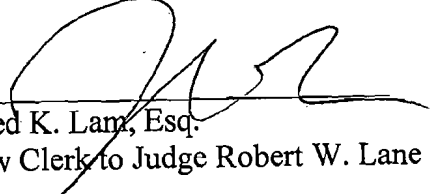
CERTIFICATION OF SERVICE

The undersigned hereby certifies that on the 28th day of February, 2020, he mailed copies of the foregoing Court Order to the following:

DENNIS VINCENT STANTON
7088 Los Banderos Ave
Las Vegas, NV 89179

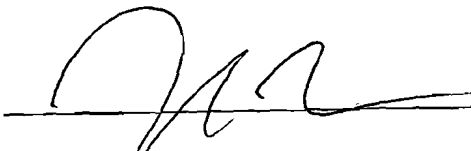
TWYLA MARIE STANTON
7088 Los Banderos Ave
Las Vegas, NV 89179

ROBERT CRAWFORD
CARMEN CRAWFORD
129 Mill Creek Dr.
Greenbrier, Arkansas 72058



Jared K. Lam, Esq.
Law Clerk to Judge Robert W. Lane

AFFIRMATION

The undersigned hereby affirms that this Court Order does not contain the social security number of any person.


Jared K. Lam, Esq.
Law Clerk to Judge Robert W. Lane

MAR 26 2020

 Nye County Clerk
Deputy

1 **NOTICE OF APPEAL**
2 DENNIS VINCENT STANTON
3 7088 Los Banderos Avenue
4 Las Vegas, Nevada 89179-1202
5 Telephone (702) 764-4690
6 dennisvstanton30@gmail.com
7 In Proper Person

8 **IN THE FIFTH JUDICIAL DISTRICT COURT OF THE**
9 **STATE OF NEVADA, IN AND FOR THE COUNTY OF NYE**

10 TWYLA MARIE STANTON,

Case No.: **CV-39304**

11 AN INDIVIDUAL;

12 First Joint Petitioner/Plaintiff,

Dept. No.: **2**

13 And

14 DENNIS VINCENT STANTON

NOTICE OF APPEAL

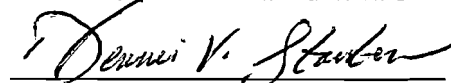
15 AN INDIVIDUAL;

16 Second Joint Petitioner/Defendant.

17 **NOTICE IS HEREBY GIVEN** that Dennis Vincent Stanton, the Second Joint
18 Petitioner/Defendant in Case No. CV-39304, by and through in proper person, hereby appeals to
19 The Supreme Court of The State of Nevada the Findings of Fact, Conclusions of Law, The Order
20 of the Dismissing of the Amended Joint Petition for Divorce with Prejudice, The Order of
21 Setting Aside the New Decree of Divorce, and The Unlawful Imposition of Discipline in the
22 form of Sanctions under NRCP Rule 11 which were attorney fees to be paid to a third attacking
23 non-party entered in this action on March 20, 2019, which was the date of the Notice of Entry of
24 Order. A tolling Motion for Reconsideration was timely filed in the district court on April 15,
25 2019. February 28, 2020 is the date that the district court entered the order resolving the tolling
26 motion.

27 **DATED** this 26th day of March, 2020.

28 DENNIS VINCENT STANTON



DENNIS VINCENT STANTON

7088 Los Banderos Avenue
Las Vegas, Nevada 89179-1207
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dennisvstanton30@gmail.com
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Twyla Marie Stanton

First Joint Petitioner/Plaintiff

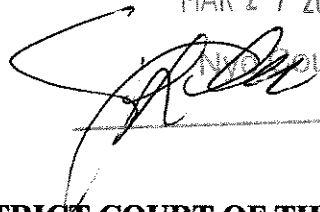
In Proper Person

twylamstanton24@gmail.com

Dennis V. Stanton

DENNIS VINCENT STANTON

MAR 27 2020


Nye County Clerk
Deputy

NOTICE OF CROSS-APPEAL
TWYLA MARIE STANTON
7088 Los Banderos Avenue
Las Vegas, Nevada 89179-1207
Telephone (702) 764-4692
twylamstanton24@gmail.com
In Proper Person

**IN THE FIFTH JUDICIAL DISTRICT COURT OF THE
STATE OF NEVADA, IN AND FOR THE COUNTY OF NYE**

TWYLA MARIE STANTON,
AN INDIVIDUAL;
First Joint Petitioner/Plaintiff,

Case No.: **CV-39304**

Dept. No.: **2**

And

DENNIS VINCENT STANTON
AN INDIVIDUAL;

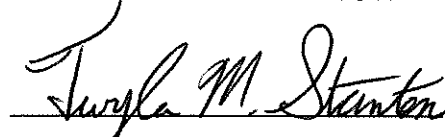
NOTICE OF CROSS-APPEAL

Second Joint Petitioner/Defendant.

NOTICE IS HEREBY GIVEN that Twyla Marie Stanton, the First Joint Petitioner/Plaintiff in Case No. CV-39304, by and through in proper person, hereby appeals to The Supreme Court of The State of Nevada the Findings of Fact, Conclusions of Law, The Order of the Dismissing of the Amended Joint Petition for Divorce with Prejudice *in my absence*, The Order of Setting Aside the New Decree of Divorce *in my absence*, and The Improper Monetary Award of Attorney's Fees to be paid to the Un-Registered Ex-Temporary Co-Guardians in the Form of Sanctions under NRCP Rule 11 *in my absence* entered in this action on March 20, 2019, which was the date of the Notice of Entry of Order. A tolling Motion for Reconsideration was timely filed in the district court on April 15, 2019. February 28, 2020 is the date that the district court entered the order resolving the tolling motion.

DATED this 27th day of March, 2020.

TWYLA MARIE STANTON



TWYLA MARIE STANTON

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Dennis Vincent Stanton
Second Joint Petitioner/Defendant
In Proper Person
dennisvstanton30@gmail.com

TWYLA MARIE STANTON