

IN THE SUPREME COURT OF THE STATE OF NEVADA

LILLIAN LACY HARGROVE,
Appellant,
v.
THOMAS REID WARD,
Respondent.

Electronically Filed
SUPREME COURT CASE NO. 81331
Dec 21 2020 11:39 a.m.
Elizabeth A. Brown
Dist. Court Case No. Clerk of Supreme Court

**JOINT APPENDIX TO APPEAL FROM THE EIGHTH JUDICIAL
DISTRICT COURT – FAMILY DIVISION**

VOLUME VI

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DESCRIPTION OF DOCUMENT	DATE	VOL.	PAGE(S)
Complaint for Custody and UCCJEA Declaration	03/12/2019	Vol. I	ROA000001 – ROA000012
Motion and Notice of Motion to Establish Paternity and/or For DNA Testing	03/12/2019	Vol. I	ROA000013 – ROA000017
Transcript of Proceedings – May 30, 2019 Motion to Establish Custody Hearing	05/30/2019	Vol. I	ROA000018 – ROA000028
Transcript of Proceedings – June 20, 2019 Status Check Hearing	06/20/2019	Vol. I	ROA000029 – ROA000078
Order After Hearing of June 20, 2019	07/02/2019	Vol. I	ROA000079 – ROA000081
Plaintiff's General Financial Disclosure Form	07/02/2019	Vol. I	ROA000082 – ROA000090
Defendant's Pre-Trial Memorandum	11/14/2019	Vol. I	ROA000091 – ROA000101
Plaintiff's Amended Pre-Trial Memorandum	11/19/2019	Vol. I	ROA000102 – ROA000118
Answer to Complaint for Custody; and Counterclaim for an Award of Attorney's Fees and Costs	11/21/2019	Vol. I	ROA000119 – ROA000125
Defendant's General Financial Disclosure Form	11/21/2019	Vol. I	ROA000126 – ROA000136
Trial Exhibit- Plaintiff's Exhibit 1: Text Messages	11/21/2019	Vol. II	ROA000137 – ROA000150
Trial Exhibit: Plaintiff's Exhibit 4: Financial Records/Deposit Slips	11/21/2019	Vol. II	ROA000151 – ROA000206
Transcript of Proceedings – November 21, 2019 Evidentiary Hearing	11/21/2019	Vol. III	ROA000207 – ROA000309
Transcript of Proceedings – December 2, 2019 Evidentiary Hearing	12/02/2019	Vol. IV	ROA000310 – ROA000390
Transcript of Proceedings – January 17, 2020 Evidentiary Hearing	01/17/2020	Vol. V	ROA000391 – ROA000447
Transcript of Proceedings – January 24, 2020 Evidentiary Hearing	01/24/2020	Vol. VI	ROA000448 – ROA000463
Order After Evidentiary Hearing of January 24, 2020	04/26/2020	Vol. VI	ROA000464 – ROA000471
Notice of Entry of Order After Evidentiary Hearing of January 24, 2020	05/11/2020	Vol. VI	ROA000472 – ROA000482

DESCRIPTION OF DOCUMENT	DATE	VOL.	PAGE(S)
Notice of Appeal	06/10/2020	Vol. VI	ROA000483 – ROA000484
Case Appeal Statement	06/10/2020	Vol. VI	ROA000485 – ROA000489

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Breeden & Associates, PLLC, and on the ____ day of December, 2020, a true and correct copy of the foregoing document was e-filed and e-served on all registered parties to the Supreme Court's electronic filing system.

Additionally, a hard copy of the Appendix with all documents on CD-ROM was served on Respondent's counsel by placing a copy in the US Mail, postage pre-paid, on the same date to:

Amanda M. Roberts, Esq.
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Las Vegas, Nevada 89121
Attorneys for Respondent Ward

/s/ Kristy Johnson
Kristy Johnson

1 TRANS

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Ann L. Williams
CLERK OF COURT

4
5 EIGHTH JUDICIAL DISTRICT COURT
6 FAMILY DIVISION
7 CLARK COUNTY, NEVADA
8

9 LILLIAN LACY HARGROVE,)

10 Plaintiff,)

11 vs.)

12 THOMAS REID WARD,)

13 Defendant.)
14

CASE NO. D-19-585818-C

DEPT. R

APPEAL NO. 81331

15 BEFORE THE HONORABLE BILL HENDERSON
DISTRICT COURT JUDGE

16 TRANSCRIPT RE: EVIDENTIARY HEARING

17 FRIDAY, JANUARY 24, 2020

18 APPEARANCES:

19 The Plaintiff: LILLIAN LACY HARGROVE
20 For the Plaintiff: BRANDON LEAVITT, ESQ.
21 2520 St. Rose Pkwy., #101
Henderson, Nevada 89074
(702) 602-7447

22 The Defendant: NOT PRESENT
23 For the Defendant: AMANDA M. ROBERTS, ESQ.
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1 LAS VEGAS, NEVADA

FRIDAY, JANUARY 24, 2020

2 P R O C E E D I N G S

3 (THE PROCEEDINGS BEGAN AT 1:29:44)

4

5 THE CLERK: We're on the record and I'm going to
6 get --

7 MS. ROBERTS: He had a family emergency. He's not
8 going to be able to --

9 THE COURT: Okay.

10 MS. ROBERTS: -- be called, Your Honor.

11 THE MARSHAL: Oh, okay.

12 THE COURT: Okay.

13 MR. LEAVITT: Then we'll stipulate to the waiver of
14 his appearance, so --

15 THE COURT: All righty.

16 MR. LEAVITT: -- it shouldn't be a big deal.

17 THE COURT: Very good. Go ahead. And have a seat,
18 please. Anything additional from either party?

19 MR. LEAVITT: No, Your Honor. We're ready for a
20 decision.

21 THE COURT: Oh, okay. Yeah. Un -- unfortunately, I
22 -- I think it's one of these cases after examining and
23 everything that falls under -- as cliché as it may sound, a
24 moral obligation rather than a legal one. And I think that's

1 kind of where we're at at this time.

2 As -- and it -- it's one of those situations if the
3 Court could simply fully indulge equity rather than the law,
4 or more to the point, simply do what it thinks in -- in an
5 ideal world is right. The Court would maintain some level of
6 an obligation or at least arrears. But I don't think the
7 totality of the law is such that it is with support section --
8 decision to any extent.

9 Now starting with the histories. They don't seem to
10 be dissimilar as to any critical matters. The chronology
11 doesn't vary that dramatically. And there's somewhat minor
12 differences as to certain time periods or not of critical
13 importance. So it's not that imperative for the Court to
14 determine whose reconstruction is more accurate in areas where
15 it varies little. Nor is it necessary to do so.

16 What is of possible importance, and will be
17 commented on is, on some of this chronology the reasonableness
18 of whether he should have reached out; whether he could have
19 been relocated; whether he was really all that inaccessible.
20 To some extent though, those details when in dispute may have
21 some relevance whether he could be located with relatives, or
22 at work with relative ease and the like. And the Court will
23 comment on that.

24 And unfortunately even though he seems to have

1 largely blown off an obligation that he had established, not
2 through any court order though and not fully by any
3 contractual sense, it does appear that he was -- despite
4 cutting off the social media, and all that, that he was not
5 difficult to find and -- and that a number and -- information
6 was located and it's 2017. Two years before this lawsuit.
7 And plus he's been at the same work for 16 years.

8 So and -- and so basically we deal with this as a
9 legal issue with some equitable elements, but the Court's not
10 necessarily invoking equity to any meaningful extent. Not to
11 the extent where the Court can find that there's no adequate
12 remedy at law. So that equity is going to carry the day, but
13 the Court does have to make note of certain equity or, maybe
14 more to the point, merits of actions or inactions by the
15 parties.

16 Now Mom's chronology more or less was January 2000
17 -- '90 -- 1999 to June 1st, 2 -- 2 -- Jan -- January 1999 to
18 June of 2001 the parties were in a relationship. Gabriel was
19 born 12/3/99. Dad's on the birth certificate. Gabriel is on
20 -- is autism spectrum. Although it wasn't really developed as
21 a major issue in the case.

22 Now the first period. Not totally clear what it
23 encompassed that period chronologically, but Dad was
24 apparently babysitting in lieu of support and that seems to --

1 we'll agree to that period. And then the move occurred in
2 March 2009 where the parties were then moving -- living in
3 different cities, Vegas and Reno. So from March '09 to April
4 2012 according to Mom's chronology Dad had about four visits,
5 but she paid for two visits. Grandma paid for one. Which
6 meant Dad didn't pay for too many. Maybe one. Maybe just a
7 few. We're not totally clear.

8 And then she indicates from April 12th to April
9 2013, a year later, that the agreement was he would pay 400 a
10 month into a Wells checking account. And I know to some
11 extent Dad's side disputes that and indicates the 400
12 situation went on a little longer.

13 Then there was some problems with Mom's account.
14 Which seem a little obtuse. I'm not sure what those are
15 about, but it meant from April to July that it didn't seem to
16 mean much of anything going on. And then in July 2013 to
17 January 2014 he was now putting a modified amount of 300 into
18 savings. And then she basically says from February 2014 to
19 May 2014 he fell off the face of the Earth. Cut off social
20 media, et cetera.

21 And, again, what's going to be important on that,
22 let's say for the sake of argument he did fall off the face of
23 the Earth. And let's say it was by design during that three
24 plus period. Why did it still take two years from 2017 to

1 2019 to file? It's unclear. Dad says Mom was occupied with
2 some other -- pursuing someone else for support or money or
3 some -- something -- Mr. Smith and some lawsuit for something.
4 I don't know if it was another chart or what -- it wasn't
5 really developed.

6 But at any rate, Mom finally contacted him in May of
7 2017 because grandma gave him the number. Now as to Dad --
8 from -- now that's the huge version. There's not a lot of
9 discrepancy with the chronology but he indicated that the 400
10 ran until like January of 2014. While Mom's version was the
11 400 ran til April of 2013. And then starting in July 2013 he
12 paid 300 into savings.

13 Dad's chronology seems to somewhat largely gloss
14 over the fact that there may have been this second period of
15 the 300. And that he just felt there was continuity of the
16 400 the whole time without the three month interruption. But
17 it doesn't -- it seems Mom's chronology is a little more
18 precise. Probably a bit more reliable as to that, but it
19 doesn't seem to really make any difference of any sort.

20 As to ru -- Mom got the number from grandma in May
21 of 2017, but against lit -- again, litigation wasn't commenced
22 for another couple years and unfortunately that turns out to
23 be important. As is the fact that Dad's been at the same
24 clinic for 15 or 16 years. He could have been pursued with

1 relative ease in Family Court or UIFSA action. In fact,
2 there's far better location and service information than we
3 have in so many of the UIFSA cases where people are eventually
4 fleshed out and brought to court.

5 Now turn more to the -- from the factual allegations
6 to the law. The parties put their emphasis on the correct
7 statutes that we need to examine to the -- to the extent there
8 doesn't seem to be a lot of case law guidance on this somewhat
9 unique and arcane fact pattern. But so we start where we
10 start. Mr. Leavitt references 126.0 -- 081(3) which that a
11 claim can be valid for three years after emancipation. Now
12 this statute didn't specify the support. Mr. Leavitt poses a
13 fair question of course. What else could it mean if not
14 support or couldn't it include support. It could very well be
15 it's for inheritance purposes or some other purpose.

16 The -- becau -- and -- and so -- but it's still a
17 fair question. Why would we wish to establish parentage
18 unless a key or a main issue was support. Fair enough, but
19 the child custody and parentage statutes are so dominated with
20 financial statutes relative to the children, and with real
21 specificity, as to how matters are calculated or -- or how we
22 deal with it. The -- presumably a statute that sounds in the
23 issue of purpose of establishing child support would have
24 indicated exactly that. And for not -- for that not to be

1 indicated, it's too much of a lead for the Court -- in -- in
2 the absence of any other supporting statute or case authority.
3 It's too much of a lead for the Court to indicate.

4 Because one can pursue a claim and establish
5 parentage for up -- up to three years during emancipation.
6 That automatically matters like support would flow from that.
7 And even if they did, are -- are they immune to equitable
8 defenses like some of the issues we -- we mentioned. Where
9 the information was known two years in advance how to locate
10 them from the grandma. And plus he arguably could have been
11 located anytime during those 15, 16 years. But I don't even
12 know if we even get to that point of peeling it away. Because
13 I don't think we can just assume in the absence of any other
14 guides that that would encompass child support.

15 Now and -- and, again, I understand the fact isn't
16 that the main reason we may want to establish parentage and
17 that -- that -- that's true as Mr. Leavitt raises the point.
18 But yet again the fact that -- that a child custody and
19 parentage matters that are so dominated by financial statutes
20 is -- tell us with precision what's going on and why they're
21 created. When a statute is created for the purpose of
22 generating support for a child, they tell us that. They don't
23 say -- they don't leave it out and say let people engage in
24 speculation and legal gymnastics and extrapolate that that's

1 what it must mean.

2 And also on this, I think on disabil -- the
3 disability issue. I think is tremendously relevant as a
4 parallel. And I agree with the parties. No particular
5 relevance in the fact that neither party was pursuing a
6 disability. But disability, when we speak in terms of
7 disability, it does speak directly to child support and that's
8 a parallel. Because that's a guide. Because if they -- it
9 does tell us if you want to invoke these other statutes such
10 as running, establishing support post majority, or having it
11 run post majority, being able to invoke the statutes for four
12 years or arrears or et cetera.

13 All of these statutes, whether it's future support
14 or we're just looking at -- at some level of arrears or
15 whatever the case. The disability has to be established prior
16 to the age of majority even in cases where people are paying
17 for a 30-year-old child. The disability and the order
18 relative to that was established prior to.

19 And I haven't -- and that's pretty clear from the
20 statutes. And there's no case law in this jurisdiction or
21 others. I'm aware carving out situations whereby one can
22 establish that post majority even in cases where it's
23 established I guess. Even if it was a case where someone
24 secreted themselves from the jurisdiction and concealed

1 themselves, that would at least be a starting point where you
2 can say okay, well, maybe in those instances. But there
3 doesn't seem to be any authority for an action like that in --
4 in any regards.

5 So I think basically there's just not enough here to
6 indicate that this is proper. Now and it's also quote --
7 quoted in 125B.030 and of course up to four years of support
8 can be collected and we -- we understand that the -- that the
9 request here that we're dealing with it at kind of a limited
10 universe. We -- we understand we're not dealing with a
11 request for ongoing support. And we're not even really
12 dealing with a request for up to four years because they're
13 more or less saying well, okay, it -- 20-year-old boy at this
14 time, run it four years from the time he was 16 to 18 and give
15 us those two years.

16 So it's certainly a reasonable limitation of the
17 claim and that's sort of how I understand the claim. And then
18 indicate in here it would be barred as to anything from age 18
19 to that -- age 20. And then there was also the -- quoting the
20 statute that contracts of this sort require no consideration,
21 but the Court really wasn't going to deal with this and make
22 any significant findings as to contractual matters.

23 Now, again, and yes -- can this Court under equity
24 boldly go where no judge has gone before? Probably not

1 necessarily. Because yes, it's a court of equity but the
2 Court doesn't find that it be some tremendous inequitable
3 injustice that's occurred. I think there's a certain level of
4 maybe irresponsibility on the part and I -- and that may be a
5 loaded term, but he had -- he had an obligation on some level,
6 not necessarily legally or even equit -- either I can find but
7 some level to -- to care about the situation and not just blow
8 off his son and the support because the other side wasn't
9 moving the ball down the field.

10 And I understand that, but still these -- these
11 parties decided to operate years without a court order. Had
12 some sort of arrangement. Anytime during those years an order
13 could have been established. At any time during 2012, '13,
14 '14, all of that and have any -- and -- all the way from '14
15 to '17 where he fell off the face of the Earth supposedly.
16 There was still no effort to create an order. And there is
17 some obligation not just on the side of a party that has --
18 can -- is going to owe support because it's their child but
19 there's an obligation on the part of the other side to
20 establish an order prior to the age of 18.

21 And the fact that -- again, I think it's pivotal,
22 the fact that whether it's debated what happened from '14 to
23 '17 he -- he may have tried to make himself -- distanced
24 himself from the situation, but an action could have and

1 should have occurred in 2017. Rather than 2019 once -- once
2 the information was gleamed from the -- the grandma.

3 And -- and at anytime really he's been at the same
4 job for 15 or 16 years. Now I understand it's not an optimum
5 situation where someone's going to take a call. Oh, he's
6 right here, I'll put you right through, it's a medical
7 situation. But it's still more than enough information that
8 if you -- if you're going to become reasonably aggressive
9 about asserting your rights, you're going to get someone
10 served. You're going to get someone notified, et cetera.

11 Now -- so we have to consider those factors. And
12 then Ms. Roberts emphasized a few statutes as well. Some of
13 them the same ones. 125A.035, minor child define -- it's --
14 and must -- the child was prior to the age of 18. And then
15 the same parentage statute of 126.161(3) can only -- but can
16 -- for the pur -- quoted for the purpose can only order
17 support if a child is a minor at the time of the
18 establishment. I think that's what it's -- where it's
19 important.

20 And then there was some sort of unnecessary kind of
21 distinctions. I don't think it's terribly necessary.
22 125B.030, the right to recover support where a child resides.
23 And there was debate, well, did he not always reside at this
24 place with Mom. For -- for as far as I can tell, he did. If

1 there were periods that he resided with the grandmother or
2 someone else, it doesn't really seem important for this
3 distinction for any of this I'm -- as far as I'm concerned he
4 always resided to -- to Mom.

5 And I -- and, again, so I think the -- the analogy
6 to the disability situation is sound because there -- we do
7 have some guidance where if there's any basis. And something
8 like disability is critically important. So even under a
9 child who is extreme -- who is extremely disabled and really
10 needs support you have to establish it before 18. All the
11 more so for a child who both admit are not disabled as defined
12 by law.

13 So I just can't make too many presumptions or leaps
14 that are not there. I do -- I -- I do think it's an
15 intriguing question and -- and I -- I realize that likely to
16 be reviewed regardless of how the Court rules. So we'll look
17 forward to any guidance in -- in that regard.

18 Each side is going to be awarded their own attorney
19 fees and I'm not sure there's much else to address. Is there
20 anything else that needs to be addressed or -- I've been kind
21 of wishing that Dad was just going to sort of extend an olive
22 branch and offer a couple like lump sum payments or extrapo --
23 like some -- a couple -- a little bit of modest help. Just to
24 make this go away and maybe create a far better situation in

1 the future for him --

2 MR. LEAVITT: Yeah.

3 THE COURT: -- and his son and their future
4 relationship by doing so. But there was no -- if he even
5 resisted a couple years of arrears being established. I --
6 obvi -- it appears that he wasn't about to come forth with any
7 offer of any substance, so --

8 MR. LEAVITT: Your Honor, just -- and -- and I
9 appreciate the -- the Court's explanation and well reasoned
10 analysis of the law and facts of this case. Your orders were
11 that each side is awarded their own attorney's fees and costs.
12 I'm not --

13 THE COURT: Save and --

14 MR. LEAVITT: -- sure --

15 THE COURT: -- except for any --

16 MR. LEAVITT: -- did you mean that each party is to
17 bear their own attorney's --

18 THE COURT: Right.

19 MR. LEAVITT: -- fees?

20 THE COURT: Right. And --

21 MR. LEAVITT: There we go.

22 THE COURT: -- save and except for if at some point
23 if Respondent was ordered to pay some of Mom's attorney fees
24 and didn't, that -- those orders are still alive. I -- are

1 there any such orders?

2 MS. ROBERTS: No, Your Honor.

3 THE COURT: Okay.

4 MR. LEAVITT: No, Your Honor.

5 THE COURT: All right. Is there anything else for
6 today's purposes or --

7 MR. LEAVITT: I --

8 THE COURT: Well, who's volunteering to prepare
9 the --

10 MS. ROBERTS: I'll --

11 THE COURT: -- order?

12 MS. ROBERTS: -- prepare the order.

13 THE COURT: Okay. Thank you so much. Send it to
14 Mr. Leavitt for review. Anything further?

15 MS. ROBERTS: No, Your Honor.

16 THE COURT: I appreciate the excellent manner this
17 was case was presented, argued, and briefed. So thank you all
18 very much. Thank you.

19 MR. LEAVITT: Thank you, Your Honor.

20 THE COURT: You bet.

21 MR. LEAVITT: We appreciate your time.

22 THE COURT: You bet.

23 (PROCEEDINGS CONCLUDED AT 1:48:16)

24

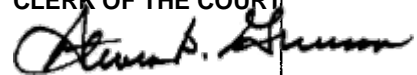
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* * * * *

ATTEST: I do hereby certify that I have truly and
correctly transcribed the digital proceedings in the above-
entitled case to the best of my ability.

Adrian Medrano

Adrian N. Medrano



1 **ORDR**

2 Amanda M. Roberts, Esq.

3 State of Nevada Bar No. 9294

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

13 LILLIAN L. HARGROVE,

14 Plaintiff,

15 v.

16 THOMAS R. WARD,

17 Defendant.

Case No: D-19-585818-C

Dept No: R

**ORDER AFTER EVIDENTIARY
HEARING**

Date of Hearing: January 24, 2020

Time of Hearing: 1:30 p.m.

18 THIS MATTER having come before the Court on the January 24, 2020, for
19 the Court's Decision following the Evidentiary Hearing held on November 21,
20 2019; December 2, 2019; January 17, 2020; and January 24, 2020. The Plaintiff,
21 Lillian Hargrove, being present and represented by Brandon K. Leavitt, Esq., of
22 Leavitt & Flaxman, LLC, and the Defendant, Thomas Ward, not being present, but
23 represented by and through his attorney of record, Amanda M. Roberts, Esq., of

Non-Trial Dispositions:

- 26 \ \ \ ☐ Other ☐ Dismissed - Want of Prosecution
27 \ \ \ ☐ Involuntary (Statutory) Dismissal ☐ Default Judgment
28 \ \ \ ☐ Transferred

Settled/Withdrawn:

- ☐ Without Judicial Conf/Hrg
☐ With Judicial Conf/Hrg
☐ By ADR

Trial Dispositions:

- ☐ Disposed After Trial Start ☒ Judgment Reached by Trial

1 Roberts Stoffel Family Law Group, and the Court having heard the argument of
2 Counsel and reviewed the pleadings on file herein hereby Orders as follows:

3
4 THE COURT HEREBY FINDS the Plaintiff stipulated to waiver of
5 Defendant's appearance on January 24, 2020, due to Defendant a family
6 emergency. The Defendant currently residences in South Lake Tahoe, California.
7 (Time Stamp 01:28:47)
8

9 THE COURT FURTHER FINDS it does not seem like the chronologies
10 provided by either Party are that dissimilar when it comes to the critical matters in
11 this case. (Time Stamp 01:30:48)
12

13 THE COURT FURTHER FINDS the somewhat minor differences regarding
14 certain time periods are not of critical importance, so it is not that imperative for the
15 Court to determine which Party's timeline is more accurate. (Time Stamp
16 01:30:55)
17

18 THE COURT FURTHER FINDS on some of the chronology the
19 reasonableness of whether Defendant should have reached out, could have been
20 located, or whether he was really all that inaccessible, remained in dispute. (Time
21 Stamp 01:31:17)
22

23 THE COURT FURTHER FINDS the Defendant seems to have largely blown
24 off an obligation he had established, although not through any Court Order and not
25 by any contractual obligation. This is a moral, not legal, issue. (Time Stamp
26 01:31:40)
27
28

1 THE COURT FURTHER FINDS that despite cutting off social media,
2 Defendant was not difficult to find. The information to locate Defendant was
3 obtained in 2017, which is two (2) years before this lawsuit commenced. In
4 addition, Defendant has been at the same place of employment for sixteen (16)
5 years. (Time Stamp 01:31:53)
6

7 THE COURT FURTHER FINDS we deal with this as a legal issue, with
8 some equitable element, but this Court is not necessarily invoking equity to any
9 meaningful extent. Not to the extent where the Court can find that there is no
10 adequate remedy at law so that equity is going to carry the day. (Time Stamp
11 01:32:16) The Court does have to make note of certain equity, or maybe more to
12 the point merits, or actions or inactions by the Parties. (Time Stamp 1:32:33)
13

14 THE COURT FURTHER FINDS the Plaintiff's chronology is that from
15 January 1999 through June 2001 the Parties were in a relationship. (Time Stamp
16 01:32:41) Gabriel was born December 3, 1999. (Time Stamp 01:33:00)
17 Defendant is on the birth certificate. (Time Stamp 01:34:02)
18

19 THE COURT FURTHER FINDS that Gabriel is on the autism spectrum
20 although it was never developed as a major issue in the case. (Time Stamp
21 01:33:05)
22

23 THE COURT FURTHER FINDS the Defendant was babysitting instead of
24 support for the first period of the child's life. (Time Stamp 01:33:11)
25
26
27
28

1 THE COURT FURTHER FINDS the Defendant moved to Reno from Las
2 Vegas in March of 2009. (Time Stamp 01:33:26)

3
4 THE COURT FURTHER FINDS according to Plaintiff's timeline, the
5 Defendant had four (4) visits from March 2009 through April 2012. (Time Stamp
6 01:33:37) Out of the four (4) visits, Plaintiff paid for two (2); Grandma paid for
7 one (1) and Defendant might have paid for one (1). (Time Stamp 01:33:36)

8
9 THE COURT FURTHER FINDS that from April 2012 until April 2013
10 Plaintiff alleged that the Defendant agreed to put \$400.00 per month into a Wells
11 Fargo checking account. (Time Stamp 01:33:54) Defendant disputed this
12 agreement. (Time Stamp 01:34:05)

13
14 THE COURT FURTHER FINDS from April 2013 through July 2013 there
15 were no deposits into the Wells Fargo account. (Time Stamp 01:34:20)

16
17 THE COURT FURTHER FINDS from July 2013 through January 2014
18 Defendant was putting a modified amount of \$300.00 into the saving account.
19 (Time Stamp 01:34:24)

20
21 THE COURT FURTHER FINDS from February of 2014 through May 2014
22 Plaintiff alleges that Defendant fell off the face of the earth and turned off social
23 media. (Time Stamp 01:34:32)

24
25 THE COURT FURTHER FINDS that the Plaintiff contacted Defendant in
26 May of 2017, and Paternal Grandmother gave Plaintiff the Defendant's telephone
27 number. (Time Stamp 01:35:14)

1 THE COURT FURTHER FINDS the Defendant's version of the chronology
2 stated he paid \$400.00 until January 2014. (Time Stamp 01:35:28)

3
4 THE COURT FURTHER FINDS that the Defendant has been at the same
5 clinic for fourteen to fifteen (14-15) years. (Time Stamp 01:36:27)

6 THE COURT FURTHER FINDS that there is not a lot of case law guidance
7 regarding the issues presented in this matter. (Time Stamp 01:37:00)

8
9 THE COURT FURTHER FINDS that pursuant to *NRS* § 126.081 (3) a claim
10 for paternity is valid three (3) years after emancipation; however, the statutes
11 regarding custody and parentage do not include language regarding post-
12 emancipation child support and are dominated by language regarding child support.
13 Therefore, it would be a leap for the Court to grant same without legal authority to
14 award same because when the purpose of the statute is to grant support, then the
15 legislature would have stated as much to avoid speculation. (Time Stamp 01:37:10
16 and 01:39:18)

17
18 THE COURT FURTHER FINDS if the Court were going to take that leap,
19 equitable defenses would matter including that Plaintiff knew how to reach
20 Defendant two (2) years prior to commencement of this action through contact with
21 Paternal Grandmother, plus she knew where he worked and it has been the same for
22 years. (Time Stamp: 01:38:35)

23
24 THE COURT FURTHER FINDS as a parallel to this issue and is a guide, the
25 Court views the disability statute under *NRS* § 125B.110 to be relevant to this issue
26
27
28

1 because it indicates that if a parent wants to invoke child support post-majority that
2 the claim has to be brought and disability has to be established before the age of
3 majority. (Time Stamp: 01:39:58)
4

5 THE COURT FURTHER FINDS that there is not enough here, legally or
6 factually, to indicate that such a request is proper. (Time Stamp: 01:41:14)
7

8 THE COURT FURTHER FINDS that the request here is limited and not
9 dealing with a request for on-going support and we are not really dealing with a
10 request for four (4) years because more or less Plaintiff admits Gabriel is twenty
11 (20) year old at this time; therefore, it is not four (4) years it is more like two (2)
12 years. (Time Stamp 01:41:36) Plaintiff's position is reasonable regarding the two
13 (2) years because the Court would be barred as to anything from age eighteen (18)
14 to age twenty (20). (Time Stamp 01:42:04)
15
16

17 THE COURT FURTHER FINDS that it will not be a tremendous inequitable
18 injustice that occurs if the Court denies Plaintiff's request. Defendant has an
19 obligation on some level, not necessary legally or even equitable, to care about the
20 situation and to not just blow off his son and support. (Time Stamp 01:42:44)
21

22 THE COURT FURTHER FINDS these Parties decided to operate for years
23 without a Court Order. Plaintiff could have established an Order at any time during
24 2012, 2013, 2014 through 2017 when Defendant supposedly fell off the face of the
25 earth and there was still no effort to create an Order. (Time Stamp 1:43:18) There
26 is still some obligation not just on the side of a Party that is going to owe support
27
28

1 because it is there child, but there is also an obligation on the other side to establish
2 an Order prior to the child's age of eighteen (18). It is debated what happen from
3 age fourteen (14) to seventeen (17). The Defendant may have distanced himself
4 from the situation, but an action should have and could have occurred in 2017
5 rather than 2019 once the information was received from the Paternal Grandma.
6

7 (Time Stamp 01:43:39)
8

9 THE COURT FURTHER FINDS as far as the Court can tell, the child at
10 issue has resided with Plaintiff. There may have been periods where he resided
11 with Paternal Grandmother, but it does not seem important for this distinction.
12

13 (Time Stamp 01:45.36)
14

15 THE COURT FURTHER FINDS a parent must establish support for a
16 disabled child before they turn eighteen (18) years old, all the more so when the
17 parents admit the child is not disabled as defined under the law. (Time Stamp
18 01:46:03)
19

20 NOW THEREFORE,
21

22 IT IS HEREBY ORDERED that the Plaintiff's request for compensation
23 from the Defendant, in the form of back child support, is denied.
24

25 IT IS FURTHER ORDERED that each Party shall bear their own attorney
26 fees and costs. (Time Stamp 01:46:38)
27
28

1 IT IS FURTHER ORDERED that Attorney Roberts shall prepare the Order
2 from the Evidentiary Hearing and Attorney Leavitt shall sign as to form and
3 content. (Time Stamp 01:47:01)
4

5 IT IS SO ORDERED this 23 day of April, 2020.

6 Bill Henderson
7
8 DISTRICT COURT JUDGE um

9 Submitted this 20th day of
10 April, 2020.

Approved as to Content and Form this
day of _____, 2020.

11 **ROBERTS STOFFEL FAMILY**
12 **LAW GROUP**

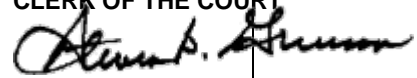
LEAVITT & FLAXMAN, LLC

13
14 By: Amanda M. Roberts

By: _____

15 Amanda M. Roberts, Esq.
16 State Bar of Nevada No. 9294
17 4411 South Pecos Road
18 Las Vegas, Nevada 89121
19 PH: (702) 474-7007
20 FAX: (702) 474-7477
EMAIL: efile@lvfamilylaw.com
Attorneys for Defendant,
Thomas Ward

Brandon K. Leavitt, Esq.
State Bar of Nevada No. 11834
2520 St. Rose Parkway, Ste. 101
Henderson, Nevada 89074
PH: (702) 213-9657
FAX: (702) _____
EMAIL: brandon@leavittflaxman.com
Attorney for Plaintiff,
Lillian Hargrove



1 **NEO**
2 BRANDON K. LEAVITT, ESQ.
3 Nevada Bar Number: 11834
4 MICHAEL C. FLAXMAN, ESQ.
5 Nevada Bar Number: 12963
6 LEAVITT & FLAXMAN, LLC
7 2520 St. Rose Pkwy., Ste. 101
8 Henderson, Nevada 89074
9 Tel: (702) 602-7447
10 Email: brandon@leavittflaxman.com
11 michael@leavittflaxman.com
12 *Attorneys for Plaintiff*

7
8 **Eighth Judicial District Court**
9 **Family Division**
10 **Clark County, Nevada**

9 LILLIAN L. HARGROVE,) CASE NO.: D-19-585818-C
10) DEPT NO.: R
11 Plaintiff,)
12)
13 vs.)
14 THOMAS REID WARD,)
15)
16 Defendant.)
17)

15 **NOTICE OF ENTRY OF ORDER AFTER EVIDENTIARY**
16 **HEARING**

17 PLEASE TAKE NOTICE that an Order After Evidentiary
18 Hearing was entered in the above-entitled matter on the 26th day of
19 April, 2020.

20 ...
21

1 A true and correct copy of said Stipulation and Order is
2 attached hereto.

3 DATED this 11th day of May, 2020.

4 LEAVITT & FLAXMAN, LLC

5
6 /s/ Brandon K. Leavitt

7 BRANDON K. LEAVITT, ESQ.

8 Nevada Bar Number: 11834

9 MICHAEL C. FLAXMAN, ESQ.

10 Nevada Bar Number: 12963

11 2520 St. Rose Pkwy., Ste. 101

12 Henderson, Nevada 89074

13 (702) 602-7447

14 *Attorneys for Plaintiff*

- 1
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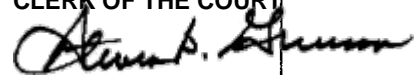
☒ pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D) and Administrative Order 14-2 captioned "In the Administrative Matter of Mandatory Electronic Service in the Eighth Judicial District Court," by mandatory electronic service through the Eighth Judicial District Court's electronic filing system;

☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;

☐ To the attorney(s) and parties listed below at the address, indicated below:

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21



1 **ORDR**

2 Amanda M. Roberts, Esq.

3 State of Nevada Bar No. 9294

4 **ROBERTS STOFFEL FAMILY LAW GROUP**

5 4411 South Pecos Road

6 Las Vegas, Nevada 89121

7 PH: (702) 474-7007

8 FAX: (702) 474-7477

9 EMAIL: efile@lvfamilylaw.com

10 Attorney for Defendant, Thomas R. Ward

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

13 LILLIAN L. HARGROVE,

14 Plaintiff,

15 v.

16 THOMAS R. WARD,

17 Defendant.

Case No: D-19-585818-C

Dept No: R

**ORDER AFTER EVIDENTIARY
HEARING**

Date of Hearing: January 24, 2020

Time of Hearing: 1:30 p.m.

18 THIS MATTER having come before the Court on the January 24, 2020, for
19 the Court's Decision following the Evidentiary Hearing held on November 21,
20 2019; December 2, 2019; January 17, 2020; and January 24, 2020. The Plaintiff,
21 Lillian Hargrove, being present and represented by Brandon K. Leavitt, Esq., of
22 Leavitt & Flaxman, LLC, and the Defendant, Thomas Ward, not being present, but
23 represented by and through his attorney of record, Amanda M. Roberts, Esq., of

Non-Trial Dispositions:

- 26 \ \ \ ☐ Other ☐ Settled/Withdrawn:
27 \ \ \ ☐ Dismissed - Want of Prosecution ☐ Without Judicial Conf/Hrg
☐ Involuntary (Statutory) Dismissal ☐ With Judicial Conf/Hrg
☐ Default Judgment ☐ By ADR

Trial Dispositions:

- 28 ☐ Disposed After Trial Start ☒ Judgment Reached by Trial

1 Roberts Stoffel Family Law Group, and the Court having heard the argument of
2 Counsel and reviewed the pleadings on file herein hereby Orders as follows:

3
4 THE COURT HEREBY FINDS the Plaintiff stipulated to waiver of
5 Defendant's appearance on January 24, 2020, due to Defendant a family
6 emergency. The Defendant currently residences in South Lake Tahoe, California.
7 (Time Stamp 01:28:47)
8

9 THE COURT FURTHER FINDS it does not seem like the chronologies
10 provided by either Party are that dissimilar when it comes to the critical matters in
11 this case. (Time Stamp 01:30:48)
12

13 THE COURT FURTHER FINDS the somewhat minor differences regarding
14 certain time periods are not of critical importance, so it is not that imperative for the
15 Court to determine which Party's timeline is more accurate. (Time Stamp
16 01:30:55)
17

18 THE COURT FURTHER FINDS on some of the chronology the
19 reasonableness of whether Defendant should have reached out, could have been
20 located, or whether he was really all that inaccessible, remained in dispute. (Time
21 Stamp 01:31:17)
22

23 THE COURT FURTHER FINDS the Defendant seems to have largely blown
24 off an obligation he had established, although not through any Court Order and not
25 by any contractual obligation. This is a moral, not legal, issue. (Time Stamp
26 01:31:40)
27
28

1 THE COURT FURTHER FINDS that despite cutting off social media,
2 Defendant was not difficult to find. The information to locate Defendant was
3 obtained in 2017, which is two (2) years before this lawsuit commenced. In
4 addition, Defendant has been at the same place of employment for sixteen (16)
5 years. (Time Stamp 01:31:53)
6

7 THE COURT FURTHER FINDS we deal with this as a legal issue, with
8 some equitable element, but this Court is not necessarily invoking equity to any
9 meaningful extent. Not to the extent where the Court can find that there is no
10 adequate remedy at law so that equity is going to carry the day. (Time Stamp
11 01:32:16) The Court does have to make note of certain equity, or maybe more to
12 the point merits, or actions or inactions by the Parties. (Time Stamp 1:32:33)
13

14 THE COURT FURTHER FINDS the Plaintiff's chronology is that from
15 January 1999 through June 2001 the Parties were in a relationship. (Time Stamp
16 01:32:41) Gabriel was born December 3, 1999. (Time Stamp 01:33:00)
17 Defendant is on the birth certificate. (Time Stamp 01:34:02)
18

19 THE COURT FURTHER FINDS that Gabriel is on the autism spectrum
20 although it was never developed as a major issue in the case. (Time Stamp
21 01:33:05)
22

23 THE COURT FURTHER FINDS the Defendant was babysitting instead of
24 support for the first period of the child's life. (Time Stamp 01:33:11)
25
26
27
28

1 THE COURT FURTHER FINDS the Defendant moved to Reno from Las
2 Vegas in March of 2009. (Time Stamp 01:33:26)

3
4 THE COURT FURTHER FINDS according to Plaintiff's timeline, the
5 Defendant had four (4) visits from March 2009 through April 2012. (Time Stamp
6 01:33:37) Out of the four (4) visits, Plaintiff paid for two (2); Grandma paid for
7 one (1) and Defendant might have paid for one (1). (Time Stamp 01:33:36)

8
9 THE COURT FURTHER FINDS that from April 2012 until April 2013
10 Plaintiff alleged that the Defendant agreed to put \$400.00 per month into a Wells
11 Fargo checking account. (Time Stamp 01:33:54) Defendant disputed this
12 agreement. (Time Stamp 01:34:05)

13
14 THE COURT FURTHER FINDS from April 2013 through July 2013 there
15 were no deposits into the Wells Fargo account. (Time Stamp 01:34:20)

16
17 THE COURT FURTHER FINDS from July 2013 through January 2014
18 Defendant was putting a modified amount of \$300.00 into the saving account.
19 (Time Stamp 01:34:24)

20
21 THE COURT FURTHER FINDS from February of 2014 through May 2014
22 Plaintiff alleges that Defendant fell off the face of the earth and turned off social
23 media. (Time Stamp 01:34:32)

24
25 THE COURT FURTHER FINDS that the Plaintiff contacted Defendant in
26 May of 2017, and Paternal Grandmother gave Plaintiff the Defendant's telephone
27 number. (Time Stamp 01:35:14)

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27
28

1 IT IS FURTHER ORDERED that Attorney Roberts shall prepare the Order
2 from the Evidentiary Hearing and Attorney Leavitt shall sign as to form and
3 content. (Time Stamp 01:47:01)
4

5 IT IS SO ORDERED this 23 day of April, 2020.

6 Bill Henderson
7
8 DISTRICT COURT JUDGE um

9 Submitted this 20th day of
10 April, 2020.

Approved as to Content and Form this
day of _____, 2020.

11 **ROBERTS STOFFEL FAMILY**
12 **LAW GROUP**

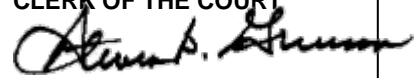
LEAVITT & FLAXMAN, LLC

13
14 By: Amanda M. Roberts

By: _____

15 Amanda M. Roberts, Esq.
16 State Bar of Nevada No. 9294
17 4411 South Pecos Road
18 Las Vegas, Nevada 89121
19 PH: (702) 474-7007
20 FAX: (702) 474-7477
EMAIL: efile@lvfamilylaw.com
Attorneys for Defendant,
Thomas Ward

~~Brandon K. Leavitt, Esq.
State Bar of Nevada No. 11834
2520 St. Rose Parkway, Ste. 101
Henderson, Nevada 89074
PH: (702) 213-9657
FAX: (702) _____
EMAIL: brandon@leavittflaxman.com
Attorney for Plaintiff,
Lillian Hargrove~~



1 **NOAS**
2 **ADAM J. BREEDEN, ESQ.**
3 Nevada Bar No. 008768
4 **BREEDEN & ASSOCIATES, PLLC**
5 376 E. Warm Springs Road, Suite 120
6 Las Vegas, Nevada 89119
7 Phone: (702) 819-7770
8 Fax: (702) 819-7771
9 Adam@Breedendandassociates.com
10 *Attorneys for Plaintiff*

11 **EIGHTH JUDICIAL DISTRICT COURT**

12 **FAMILY DIVISION**

13 **CLARK COUNTY, NEVADA**

14 **LILLIAN L. HARGROVE,**

15 Plaintiff,

16 v.

17 **THOMAS REID WARD,**

18 Defendant.

CASE NO.: D-19-585818-C

DEPT NO.: R

NOTICE OF APPEAL

19 Notice is hereby given that Plaintiff, LILLIAN L. HARGROVE, hereby
20 appeals to the Supreme Court of Nevada from the Order After Evidentiary Hearing
21 entered in this case on April 26, 2020 with Notice of Entry being filed May 11, 2020.

22 DATED this 10th day of June, 2020.

BREEDEN & ASSOCIATES, PLLC



ADAM J. BREEDEN, ESQ.

Nevada Bar No. 008768

376 E. Warm Springs Road, Suite 120

Las Vegas, Nevada 89119

Phone: (702) 819-7770

adam@breedenandassociates.com

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CERTIFICATE OF SERVICE

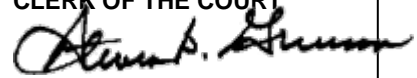
I hereby certify that on the 10th day of June, I served a copy of the foregoing legal document **NOTICE OF APPEAL** via the method indicated below:

X	Pursuant to NRCP 5 and NEFCR 9, by electronically serving all counsel and e-mails registered to this matter on the Court's official service, Wiznet system.
	Pursuant to NRCP 5, by placing a copy in the US mail, postage pre-paid to the following counsel of record or parties in proper person: Brandon K. Leavitt, Esq. Michael C. Flaxman, Esq. LEAVITT & FLAXMAN, LLC 2520 St. Rose Parkway, Suite 101 Henderson, Nevada 89074 Amanda M. Roberts, Esq. ROBERTS STOFFEL FAMILY LAW GROUP 4411 S. Pecos Road Las Vegas, Nevada 89121
	Via receipt of copy (proof of service to follow)

An Attorney or Employee of the following firm:

/s/ Kristy Johnson

BREEDEN & ASSOCIATES, PLLC



1 **ASTA**
2 **ADAM J. BREEDEN, ESQ.**
3 Nevada Bar No. 008768
4 **BREEDEN & ASSOCIATES, PLLC**
5 376 E. Warm Springs Rd. Suite 120
6 Las Vegas, NV 89119
7 Phone: 702.819.7770
8 Fax: 702.819.7771
9 E-Mail: Adam@Breedendassociates.com
10 *Attorneys for Appellant Hargrove*

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

10 LILLIAN L. HARGROVE,
11 Plaintiff,
12 v.

CASE NO.: D-19-585818-C
DEPT NO.: R

13 THOMAS REID WARD,
14 Defendant.

15
16 **CASE APPEAL STATEMENT**

- 17 1. Name of appellant filing this case appeal statement:
18
19 LILLIAN L. HARGROVE, PLAINTIFF
- 20 2. Identify the judge issuing the decision, judgment, or order appealed from:
21
22 HON. BILL HENDERSON, EIGHTH JUDICIAL DISTRICT COURT
23 FAMILY DIVISION DEPARTMENT R.
- 24 3. Identify each appellant and the name and address of counsel for each appellant:
25
26 LILLIAN HARGROVE, APPELLANT. REPRESENTED BY COUNSEL
27 ADAM J. BREEDEN, ESQ., BREEDEN & ASSOCIATES, PLLC, 376 E.
28

ROA000485

1 WARM SPRINGS RD., SUITE 120, LAS VEGAS, NV 89119, (702) 819-
2 7770.

3
4 4. Identify each respondent and the name and address of appellate counsel, if
5 known, for each respondent (if the name of a respondent's appellate counsel is
6 unknown, indicate as much and provide the name and address of that respondent's
7 trial counsel):
8

9 THOMAS R. WARD. TRIAL COUNSEL WAS AMANDA ROBERTS,
10 ESQ. OF ROBERTS STOFFEL FAMILY LAW GROUP, 4411 SOUTH
11 PECOS RD., LAS VEGAS, NEVADA 89121, (702) 474-7007.
12

13 APPELLATE COUNSEL IS UNKNOWN.

14 5. Indicate whether any attorney identified above in response to question 3 or 4 is
15 not licensed to practice law in Nevada and, if so, whether the district court granted
16 that attorney permission to appear under SCR 42 (attach a copy of any district court
17 order granting such permission):
18

19
20 ALL COUNSEL IN THIS MATTER ARE LICENSED TO PRACTICE LAW
21 IN THE STATE OF NEVADA.

22 6. Indicate whether appellant was represented by appointed or retained counsel in
23 the district court:
24

25 APPELLANT WAS REPRESENTED BY RETAINED COUNSEL IN THE
26 DISTRICT COURT PROCEEDINGS. COUNSEL WAS BRANDON K.
27 LEAVITT, ESQ. OF LEAVITT & FLAXMAN, LLC.
28

1 7. Indicate whether appellant is represented by appointed or retained counsel on
2 appeal:

3
4 APPELLANT IS REPRESENTED BY RETAINED COUNSEL FOR THE
5 APPEAL. APPELLATE COUNSEL IS ADAM J. BREEDEN, ESQ.

6 8. Indicate whether appellant was granted leave to proceed in forma pauperis, and
7 the date of entry of the district court order granting such leave:

9 NO PARTY HAS APPEARED IN FORMA PAUPERIS.

10 9. Indicate the date the proceedings commenced in the district court (e.g., date
11 complaint, indictment, information, or petition was filed):

13 THE ORIGINAL CIVIL COMPLAINT WAS FILED ON MARCH 12, 2019.

14 10. Provide a brief description of the nature of the action and result in the district
15 court, including the type of judgment or order being appealed and the relief granted
16 by the district court:

18 PLAINTIFF APPEALS FROM AN ORDER DENYING HER
19
20 RETROACTIVE CHILD SUPPORT UNDER NRS § 125B.030.

21 11. Indicate whether the case has previously been the subject of an appeal to or
22 original writ proceeding in the Supreme Court or Court of Appeals and, if so, the
23 caption and docket number of the prior proceeding:

25 NOT APPLICABLE/NO PRIOR APPEALS OR SUPREME COURT
26 PROCEEDINGS.

27
28 12. Indicate whether this appeal involves child custody or visitation:

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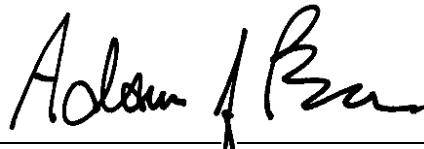
THE CASE DOES NOT CONCERN CHILD CUSTODY OR VISITATION.

13. If this is a civil case, indicate whether this appeal involves the possibility of settlement:

IT IS THE APPELLANT'S POSITION THAT A SETTLEMENT CONFERENCE MAY HELP RESOLVE THIS APPEAL.

DATED this 10th day of June, 2020.

BREEDEN & ASSOCIATES, PLLC



ADAM J. BREEDEN, ESQ.

Nevada Bar No. 008768

376 E. Warm Springs Rd. Suite 120
Las Vegas, Nevada 89119

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of June, I served a copy of the foregoing legal document **CASE APPEAL STATEMENT** via the method indicated below:

X	Pursuant to NRCP 5 and NEFCR 9, by electronically serving all counsel and e-mails registered to this matter on the Court's official service, Wiznet system.
	Pursuant to NRCP 5, by placing a copy in the US mail, postage pre-paid to the following counsel of record or parties in proper person: Brandon K. Leavitt, Esq. Michael C. Flaxman, Esq. LEAVITT & FLAXMAN, LLC 2520 St. Rose Parkway, Suite 101 Henderson, Nevada 89074 Amanda M. Roberts, Esq. ROBERTS STOFFEL FAMILY LAW GROUP 4411 S. Pecos Road Las Vegas, Nevada 89121
	Via receipt of copy (proof of service to follow)

An Attorney or Employee of the following firm:

/s/ Kristy Johnson

BREEDEN & ASSOCIATES, PLLC