



1 **NOA**  
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Electronically Filed  
Jul 24 2020 02:24 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

10 **DISTRICT COURT**  
11 **FAMILY DIVISION**  
12 **CLARK COUNTY, NEVADA**

13 **AHED SAID SENJAB,**  
14 **Plaintiff,**

15 **vs.**

16 **MOHAMAD ABULHAKIM ALHULAIBI,**  
17 **Defendant.**

CASE NO: D-20-606093-D  
DEPT. NO: H

DATE OF HEARING: 6/16/2020  
TIME OF HEARING: H

18 **NOTICE OF APPEAL**

19 NOTICE is hereby given that Plaintiff, Ahed Said Senjab, hereby appeals to the  
20 Supreme Court of the State of Nevada from the *Findings of Fact, Conclusions of*  
21 *Law, Decision and Order* entered in this action on 17th day of June, 2020.

22 DATED this 16 day of July, 2020.

23 **WILICK LAW GROUP**



24 **MARSHAL S. WILICK, ESQ.**  
25 Nevada Bar No. 2515  
26 3591 E. Bonanza Road, Suite 200  
27 Las Vegas, NV 89110-2101  
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Pro-Bono Attorneys for Plaintiff/Appellant

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## CERTIFICATE OF SERVICE

Pursuant to NRCPP 5(b), I certify that I am an employee of the WILICK LAW GROUP and that on this 16<sup>th</sup> day of July, 2020, I caused the above and foregoing entitled document *Notice of Appeal*, to be served as follows:

- ☒ [X] 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.
- ☐ [ ] Pursuant to NRCPP 5(b)(2)(D), by email by duly executed consent for service by electronic means.
- ☐ [ ] By hand delivery with signed Receipt of Copy.
- ☐ [ ] By First Class, Certified U.S. Mail.

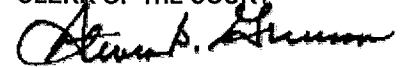
To the following at the address, email address, and/or facsimile number indicated below:

David Markman, Esq.  
Markman Law  
4484 S. Pecos Road, Ste. 130  
Las Vegas, Nevada 89121  
Attorneys for Defendant

April S. Green, Esq.  
Barbara E. Buckley, Esq.  
LEGAL AID CENTER OF SOUTHERN NEVADA, INC.  
725 East Charleston Blvd.  
Las Vegas, NV 89104  
Co-Counsel for Plaintiff

  
An Employee of the WILICK LAW GROUP

P:\wp19\SENJAB\A\DRAFTS\00446449.WPD\jj



**SOLA**  
**APRIL S. GREEN, ESQ.**  
Nevada Bar No. 8340C  
**BARBARA BUCKLEY, ESQ.**  
Nevada Bar No. 3918  
**LEGAL AID CENTER OF SOUTHERN NEVADA, INC.**  
725 East Charleston Blvd.  
Las Vegas, Nevada 89104  
(702)386-1070, Ext. 1415  
Attorneys for Plaintiff

CASE NO: D-20-606093-D  
Department: To be determined

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

AHED SAID SENJAB,

Plaintiff,

vs.

MOHAMAD ALHULAIBI,

Defendant,

Case No.:

Dept. No.:

STATEMENT OF LEGAL AID REPRESENTATION  
AND FEE WAIVER (PURSUANT TO NRS 12.015)

Party Filing Statement:

☒ Plaintiff/Petitioner

☐ Defendant/Respondent

**STATEMENT**

AHED SAID SENJAB, Plaintiff herein, has qualified and been accepted for placement as a direct client of LEGAL AID CENTER OF SOUTHERN NEVADA, a nonprofit organization providing free legal assistance to indigents in Clark County, Nevada, and is entitled to pursue or defend this action without costs as defined in NRS 12.015.

Dated: March 24, 2020

APRIL S. GREEN, ESQ.  
Printed Name of Preparer

  
Signature of Preparer

Submitted by:

**LEGAL AID CENTER OF SOUTHERN NEVADA, INC.**  
725 East Charleston Blvd.  
Las Vegas, Nevada 89104  
(702)386-1070, Ext. 1415  
Attorneys for Plaintiff

## EIGHTH JUDICIAL DISTRICT COURT

**CASE SUMMARY****CASE NO. D-20-606093-D**

**Ahed Said Senjab, Plaintiff**  
**vs.**  
**Mohamad Abulhakim Alhulaibi, Defendant.**

§  
 §  
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Location: **Department H**  
 Judicial Officer: **Ritchie, T. Arthur, Jr.**  
 Filed on: **03/24/2020**

**CASE INFORMATION****Statistical Closures**

06/17/2020 Settled/Withdrawn With Judicial Conference or Hearing

Case Type: **Divorce - Complaint**

Subtype: **Complaint Subject Minor(s)**

Case Status: **06/30/2020 Reopened**

Case Flags: **Order / Decree Logged Into  
 Department  
 Appealed to Supreme Court  
 16.2 Eligible**






**DATE****CASE ASSIGNMENT****Current Case Assignment**

Case Number	D-20-606093-D
Court	Department H
Date Assigned	03/24/2020
Judicial Officer	Ritchie, T. Arthur, Jr.

**PARTY INFORMATION**

<b>Plaintiff</b>	<b>Senjab, Ahed Said</b> P.O. Box 571150 Las Vegas, NV 89157	<i>Attorneys</i> <b>Green, April S.</b> Retained 702-386-1415(W) <b>Willick, Marshal Shawn</b> Retained 702-438-4100(W)
<b>Defendant</b>	<b>Alhulaibi, Mohamad Abulhakim</b> 1055 E. Flamingo Rd. #416 Las Vegas, NV 89119	<b>Markman, David</b> Retained 702-843-5899(W)
<b>Subject Minor</b>	<b>Alhulaibi, Ryan Mohamad</b>	

**DATE****EVENTS & ORDERS OF THE COURT****EVENTS**

03/24/2020	 Statement of Legal Aid Representation and Fee Waiver Filed By: Plaintiff Senjab, Ahed Said Statement of Legal Aid Representation and Fee Waiver
03/24/2020	 Complaint for Divorce Filed by: Plaintiff Senjab, Ahed Said Complaint for Divorce
03/24/2020	 Summons Issued Only Filed by: Plaintiff Senjab, Ahed Said Summons
03/24/2020	 Request for Issuance of Joint Preliminary Injunction Request for Issuance of Joint Preliminary Injunction
03/24/2020	 Summons Electronically Issued - Service Pending


















# CASE SUMMARY

CASE NO. D-20-606093-D

	Filed by: Plaintiff Senjab, Ahed Said <i>Summons</i>
03/26/2020	 Summons Filed By: Plaintiff Senjab, Ahed Said <i>Summons</i>
03/26/2020	 Joint Preliminary Injunction <i>Joint Preliminary Injunction</i>
03/26/2020	 Affidavit of Service Filed By: Plaintiff Senjab, Ahed Said <i>Affidavit/Declaration of Service</i>
04/14/2020	 Request for Waiver of Program Attendance / Order <i>Request for Waiver of Program Attendance</i>
04/14/2020	 Motion to Dismiss Filed by: Attorney Markman, David; Defendant Alhulaibi, Mohamad Abulhakim <i>Defendant's Motion to Dismiss for Lack of Jurisdictional Requirements</i>
04/14/2020	 Notice of Appearance Party: Defendant Alhulaibi, Mohamad Abulhakim <i>Notice of Appearance</i>
04/15/2020	 Notice of Hearing <i>Notice of Hearing</i>
04/15/2020	 Affidavit of Resident Witness Filed by: Plaintiff Senjab, Ahed Said <i>Affidavit of Resident Witness</i>
04/15/2020	 Affidavit in Support of Summary Disposition Filed by: Plaintiff Senjab, Ahed Said <i>Affidavit of Plaintiff in Support of Request for Summary Disposition of Decree of Divorce</i>
04/24/2020	 Opposition Filed By: Plaintiff Senjab, Ahed Said <i>Plaintiff's Opposition to Defendant's Motion to Dismiss for Lackk of Jurisdictional Requirements</i>
04/24/2020	 Certificate of Service Filed by: Plaintiff Senjab, Ahed Said <i>Certificate of Service</i>
04/24/2020	 Exhibits Filed By: Plaintiff Senjab, Ahed Said <i>Exhibit in Support of Plaintiff's Opposition to Defendant's Motion to Dismiss for Lack of Jurisdictional Requirements</i>
04/24/2020	 Certificate of Service Filed by: Plaintiff Senjab, Ahed Said <i>Certificate of Service</i>
05/13/2020	 Reply Filed By: Defendant Alhulaibi, Mohamad Abulhakim <i>Defendant's Reply in Support of His Motion to Dismiss for Lack of Jurisdictional Requirements</i>
05/18/2020	 Supplemental Filed By: Plaintiff Senjab, Ahed Said <i>Supplemental Exhibits in Support of Plaintiff's Opposition to Defendant's Motion to Dismiss for Lack of Jurisdictional Requirements</i>
05/18/2020	 Certificate of Service Filed by: Plaintiff Senjab, Ahed Said <i>Certificate of Service</i>

# CASE SUMMARY

CASE NO. D-20-606093-D

05/20/2020	 Supplemental Filed By: Plaintiff Senjab, Ahed Said <i>2nd Supplemental Exhibits in Support of Plaintiff's Opposition to Defendant's Motion to Dismiss for Lack of Jurisdictional Requirements</i>
05/20/2020	 Certificate of Service Filed by: Plaintiff Senjab, Ahed Said <i>Certificate of Service</i>
06/08/2020	 Confidential Information sheet - Domestics Filed by: Plaintiff Senjab, Ahed Said <i>Confidential Exhibit in Support of Plaintiff's Memorandum of Law in Opposition of Defendant's Motion to Dismiss</i>
06/08/2020	 Memorandum <i>Plaintiff's Memorandum of Law in Opposition of Defendant's Motion to Dismiss</i>
06/08/2020	 Exhibits Filed By: Plaintiff Senjab, Ahed Said <i>Exhibits in Support of Plaintiff's Memorandum of Law in Opposition of Defendant's Motion to Dismiss</i>
06/08/2020	 Supplemental Filed By: Defendant Alhulaibi, Mohamad Abulhakim <i>Supplement to Motion to Dismiss</i>
06/09/2020	 Certificate of Service Filed by: Plaintiff Senjab, Ahed Said <i>Certificate of Service</i>
06/11/2020	 Exhibits Filed By: Attorney Green, April S. <i>Confidential Exhibit in Support of Plaintiff's Memorandum of Law in Opposition of Defendant's Motion to Dismiss</i>
06/17/2020	 Findings of Fact, Conclusions of Law and Judgment
06/17/2020	 Notice of Entry of Order <i>Notice of Entry of Order</i>
06/18/2020	 Request Transcript of Proceedings Party: Plaintiff Senjab, Ahed Said <i>Request Transcript of Proceedings</i>
06/18/2020	 Order
06/18/2020	 Estimate of Transcript <i>JUNE 16, 2020 - FEES WAIVED</i>
06/18/2020	 Estimate of Transcript <i>JUNE 16, 2020</i>
06/29/2020	 Petition Filed By: Defendant Alhulaibi, Mohamad Abulhakim <i>Mohamad Alhulaibi's Ex Parte Petition/Motion for an Order Requiring Production of the Minor Child; For the Insuance of a Warrant for the Pick-Up of the Minor Child; For an Order Preventing Abduction of the Minor Child Pursuant to NRS 125D; For a Retrurn Order for the mInor Child to His Home Country of Saudi Arabia</i>
06/30/2020	 Notice of Hearing <i>Notice of Hearing</i>
07/01/2020	 Notice of Association of Counsel Filed by: Plaintiff Senjab, Ahed Said <i>Notice of Association as Co-Counsel</i>
07/01/2020	

# CASE SUMMARY

CASE NO. D-20-606093-D



## Opposition and Countermotion

Filed By: Plaintiff Senjab, Ahed Said; Defendant Alhulaibi, Mohamad Abulhakim  
*Plaintiff's Opposition to "Mohamad Alhulaibi's Ex Parte Petition/Motion for an Order Requiring Production of the Minor Child; for the Issuance of a Warrant for the Pick-Up of the Minor Child; for an Preventing Abduction of the Minor Child Pursuant to NRS 125D; for a Return Order for the Minor Child to His Home Country of Saudi Arabia" and Plaintiff's Countermotion/Petition for Abduction Prevention Measures, for Orders Prohibiting Removal of Child from Las Vegas, for Court Safeguard of Child's Passport; for Limited Vistation by a Perpetrator of Domestic Violence; Stay of Order for Dismissal of Case; and for Attorney's Fees and Costs*

07/02/2020



## Financial Disclosure Form

Filed by: Plaintiff Senjab, Ahed Said  
*General Financial Disclosure Form*

07/15/2020



## Opposition

Filed By: Defendant Alhulaibi, Mohamad Abulhakim  
*Mohamad's opposition to Plaintiff's Countermotion*

07/16/2020



## Notice of Appeal

Filed By: Plaintiff Senjab, Ahed Said  
*Notice of Appeal*

## HEARINGS

05/20/2020

**Motion** (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

**05/20/2020, 06/16/2020**

*Defendant's Motion to Dismiss for Lack of Jurisdictional Requirements (Cont. from 5/20/2020)*  
 Matter Continued;  
 Decision Made;  
 Matter Continued;  
 Decision Made;

05/20/2020

**Opposition & Countermotion** (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

**05/20/2020, 06/16/2020**

*Pltf's Opposition To Deft's Motion To Dismiss For Lack Of Jurisdictional Requirements (Cont. from 5/20/2020)*  
 Matter Continued;  
 Decision Made;  
 Matter Continued;  
 Decision Made;

05/20/2020



**All Pending Motions** (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Matter Heard;  
 Journal Entry Details:

*DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTIONAL REQUIREMENTS...PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTIONAL REQUIREMENTS* Court interpreter (Arabic), Omar J. Rifad, was present on behalf of the Plaintiff. Both parties, Court Interpreter Rifad, Attorney Green, and Attorney Markman appeared telephonically, pursuant to the Administrative Orders for public safety. Court stated it reviewed the papers and pleadings in this case and the TPO case (T-203688-T). Both counsel stated there are no agreements. Court reviewed the history of the case. Court stated it saw no Jurisdiction Enforcement Act Affidavit. Discussion regarding the timeline of when Plaintiff alleges physical presence in Nevada, with intent to make it her home, and non-immigration alien not having a proper domicile and cannot get divorced. Court stated it has jurisdiction to grant the divorce. Further, Nevada Courts are to have subject matter jurisdiction over custody matters. Attorney Markman stated Defendant believes the home of the child is Saudi Arabia, for the reason they were in Saudi Arabia six months prior to the filing. Attorney Green stated Defendant has no intention to return to Saudi Arabia. Court stated Nevada is not the home state and Plaintiff needs to walk through the elements of custody. Attorney Markman stated they never had such intent to stay. Argument regarding people getting divorced all the time, who are not legal, however, reside here. Court noted there is a Protection Order that has been extended to February, 2021 and that Protection Order provided for a split week custody schedule. Attorney Markman stated the abuse allegations have not been substantiated. Further, Defendant admitted it was all verbal, and then alleged physical abuse. Court stated the Protection Order is a valid Order. Court stated it can have temporary, emergency jurisdiction. Attorneys Markman and Green stated there are no other cases and no other action. Attorney Markman stated Defendant was waiting for her brother-in-law to come from the State of Maryland, pick up her and the child, and take them to Maryland. Attorney Markman requested the child be on the ticket to return home with Defendant. Attorney Green stated Attorney Markman's Reply was way beyond the scope of Defendant's Motion. Court stated this case has many layers of analysis for residency of Plaintiff, custody jurisdiction, personal jurisdiction over Defendant, and jurisdiction to grant the divorce. Further, every issue involves legal and factual questions. Court stated it will

# CASE SUMMARY

CASE NO. D-20-606093-D

allow Plaintiff to supplement the Memorandum of law to address each of these issues. COURT ORDERED, the following: Defendant's MOTION and Plaintiff's OPPOSITION shall be CONTINUED. The DEADLINE for the BRIEFS to be FILED is 6/8/2020. The Court will read the cases Attorney Markman cited and Attorney Green's SUPPLEMENT. CONTINUED TO: 6/16/2020 9:00 AM - Regional Justice Center, Courtroom 3G;

06/16/2020



**All Pending Motions** (9:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Matter Heard;

Journal Entry Details:

**DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTIONAL REQUIREMENTS...PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTIONAL REQUIREMENTS** Both parties, Attorney Green, and Attorney Markman appeared telephonically, pursuant to the Administrative Orders for public safety. Court interpreter (Arabic), Saad Musa, appeared telephonically on behalf of the Plaintiff. Court reviewed the history of the case. Court stated it has reviewed the Motion, Response, Reply, and the additional Memorandum, filed 6/8/2020. Further, a review of the papers does not show contested facts. Court noted the parties were married on 2/17/2018. Further, it is not disputed that Plaintiff was here on a student F1 Visa to attend school, he applied for the Visa in 2018, and it was granted in 2019. Further, it is not contested that Plaintiff purchased air travel and traveled to the United States with his wife and child on 1/13/2020. Court noted this is not the home state of the child. Court noted there is a Protection Order for domestic violence (case no. T-20-203688-T), Plaintiff being the Applicant, the Protection Order was heard and extended, and is in effect until 2/14/2021. Attorney Markman stated Defendant denies all of Plaintiff's allegations in her application. Court stated it does not appear contested that Plaintiff was present in Nevada from March, 2020, and she has resided here six weeks prior to filing, and she was here on an F2 Visa (student Visa dependant). Argument regarding whether Nevada has subject matter jurisdiction, whether Plaintiff had the intent to remain in the State of Nevada, whether Plaintiff met the requirements of Nevada law to file for divorce, whether this Court has jurisdiction over the child, and Plaintiff having the right to citizenship through the Violence Against Women Act. Court noted Federal law preempts Nevada law. COURT ORDERED, the following: Matter TAKEN UNDER ADVISEMENT on the Motion To Dismiss, and all other issues will be incorporated in the decision. ;

06/22/2020



**Minute Order** (11:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Decision From 6/16/2020 Hearing

Decision Made; Decision From 6/16/2020 Hearing

Journal Entry Details:

For the reasons expressed in the FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER filed June 18, 2020, COURT ORDERED, Mohamad Abulhakim Alhulaibi's Motion To Dismiss is GRANTED. COURT FURTHER ORDERED, this case is DISMISSED and CLOSED with the entry of this Order.;

08/04/2020

**Motion** (11:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Defendant's Mohamad Alhulaibi's Ex Parte Petition/Motion for an Order Requiring Production of the Minor Child; For the Insuance of a Warrant for the Pick-Up of the Minor Child; For an Order Preventing Abduction of the Minor Child Pursuant to NRS 125D; For a Retrurn Order for the mInor Child to His Home Country of Saudi Arabia

08/04/2020

**Opposition & Countermotion** (11:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Plaintiff's Reply in Support of Plaintiff's Motion for an Order to Show Cause why Defendant should not be Held in Contempt for Failure to Abide by the Court Order Regarding Plaintiff's Timeshare, for Penalties and Sanctions against Defendant, for an Emergency Pickup Order, for Makeup Time, to Amend Pleadings, for Attorney's Fees and Costs, and for Other Related Relief

08/04/2020

**Opposition** (11:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Mohamad's opposition to Plaintiff's Countermotion

## SERVICE

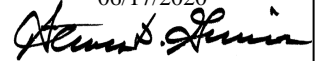
03/24/2020

**Summons**

Alhulaibi, Mohamad Abulhakim

Served: 03/25/2020





CLERK OF THE COURT

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45 DISTRICT COURT  
6 FAMILY DIVISION  
7 CLARK COUNTY, NEVADA  
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10 AHED SAID SENJAB,

CASE NO. D-20-606093-D

11 Plaintiff,

DEPT NO. H

12 vs.

13 MOHAMAD ABULHAKIM

Date of Hearing: June 16, 2020

14 ALHULAIBI,

Time of Hearing: 9:00 a.m.

15 Defendant.  
1617 **FINDINGS OF FACT, CONCLUSIONS OF LAW,**  
18 **DECISION AND ORDER**  
19

20 This matter came on for hearing before Art Ritchie, District Court Judge,  
21 Department H. Plaintiff was represented by her attorneys, Legal Aid Center of  
22 Southern Nevada, and April S. Green, Esq. Defendant was represented by his  
23 attorneys, Markman Law, and David Markman, Esq. This court considered the  
24 papers and pleadings, the arguments of counsel, and for good cause stated in this  
25 order, grants Mohamad Abulhakim Alhulaibi's motion to dismiss.  
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1           **I. BACKGROUND**  
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3           This is a divorce case to dissolve a marriage between Ahed Said Senjab  
4 and Mohamad Abulhakim Alhulaibi. Ms. Senjab and Mr. Alhulaibi are citizens  
5 of Syria. They married in Saudi Arabia on February 17, 2018. The parties have  
6 one minor child, Ryan Mohamad Alhulaibi, who was born on February 16, 2019.  
7

8           Mohamad Abulhakim Alhulaibi obtained an F-1 Visa and came to the United  
9 States to attend graduate school at UNLV in 2018. Mr. Alhulaibi alleged that  
10 Ahed Said Senjab applied for an F-2 Visa in August, 2018, and that an F-2 Visa  
11 was granted to her and the parties' child at the end of 2019. In December, 2019,  
12 Mr. Alhulaibi returned to Saudi Arabia after the fall semester. Mr. Alhulaibi  
13 alleged that he purchased round trip airline tickets on Turkish Airlines for  
14 himself, Ahed Said Senjab, and the parties' child for travel to Nevada on January  
15 13, 2020 with a return flight to Saudi Arabia on June 18, 2020.  
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20           The parties and their child arrived in Las Vegas, Nevada, on January 13, 2020.  
21 On February 14, 2020, Ahed Said Senjab filed an Application for Protective  
22 Order, assigned Case No. T-20-203688-T. The Ex-Parte Application was  
23 granted, and the matter was continued for consideration of an extension of the  
24 order. The matter was heard on March 17, 2020 and on March 30, 2020. The  
25 Hearing Master heard testimony from the parties and argument from counsel.  
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1 The court granted the request and extended the protective order until February 14,  
2 2021. The Extended Protective Order was filed on March 30, 2020 and it  
3 contains custody orders defining Ms. Senjab's physical custody time with Ryan  
4 as Monday at 10:00 a.m. through Friday at 3:00 p.m., and Mr. Alhulaibi's  
5 physical custody time with Ryan as Friday at 3:00 p.m. though Monday at 10:00  
6 a.m.  
7  
8

9  
10 Ahed Said Senjab filed a Complaint for Divorce on March 24, 2020. Ms.  
11 Senjab seeks a divorce, child custody and support orders, and spousal support.  
12 Mohamad Abulhakim Alhulaibi was served on March 25, 2020. Mr. Alhulaibi's  
13 Motion to Dismiss was filed on April 14, 2020. Ms. Senjab filed her Opposition  
14 on April 24, 2020 and Mr. Alhulaibi's Reply to Opposition was filed on May 13,  
15 2020. Ms. Senjab filed Supplemental Exhibits on May 18, 2020 and on May 20,  
16 2020.  
17  
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19 The matter was heard on May 20, 2020. The parties appeared by telephone,  
20 with counsel. Because of the timing of Plaintiff's filings, and because the court  
21 requested additional briefing, the matter was continued to June 16, 2020.  
22  
23

24 Ahed Said Senjab filed a Memoranda of Law on June 8, 2020 and Mohamad  
25 Abulhakim Alhulaibi filed a Supplemental Brief on June 8, 2020. On June 11,  
26  
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1 2020, Ms. Senjab filed a third Supplemental Exhibit. The parties were present by  
2 telephone and represented by counsel at the hearing on June 16, 2020.  
3

## 4 **II. LEGAL STANDARD**

5  
6 Subject matter jurisdiction is the power of the court to decide a particular  
7 type of controversy. A party may file a motion asserting the defense of lack of  
8 subject-matter jurisdiction pursuant to NRCP 12(b)(1). The court should dismiss  
9 a case when a party fails to state a claim upon which relief can be granted. If a  
10 court determines at any time that it lacks subject-matter jurisdiction, the court  
11 must dismiss the action. NRCP 12(h)(3).  
12  
13

## 14 **III. FINDINGS AND CONCLUSIONS**

- 15 1. For this Nevada court to have subject matter jurisdiction to grant a  
16 divorce, one of the parties must be a bona fide resident of the state of  
17 Nevada.  
18
- 19 2. NRS 125.020 (e) provides that the district court has jurisdiction to grant  
20 a divorce if one of the parties has resided 6 weeks in the state before the  
21 suit was brought.  
22
- 23 3. Residence is synonymous with domicile. Physical presence, together  
24 with intent, constitutes bona fide residence for divorce jurisdiction.  
25  
26 *Aldabe v. Aldabe*, 84 Nev 392, 441 P.2d 691 (1968).  
27  
28

- 1 4. Ahed Said Senjab has the burden to prove that she or Mohamad  
2 Abulhakim Alhulaibi is a bona fide resident of the state of Nevada for  
3 this court to grant a divorce.  
4
- 5 5. Ahed Said Senjab and Mohamad Abulhakim Alhulaibi have been  
6 physically present in the state of Nevada for at least 6 weeks prior to the  
7 filing of this divorce case.  
8
- 9 6. This court finds that pursuant to state law, undocumented immigrants  
10 who physically live in Nevada have been able to access Nevada courts  
11 to obtain a divorce so long as they have been physically present in  
12 Nevada, and so long as they establish a subjective intention to make  
13 Nevada their home.  
14
- 15 7. The Ninth Circuit Court of Appeals, in *Park v. Barr*, 946 F.3d 1096  
16 (2020), held that federal law has preempted state law. The holding in  
17 *Park*, bars nonimmigrants who come to the United States on a visa  
18 issued pursuant to Title 8 of the United States Code from establishing  
19 the subjective intent that is required to give this Nevada court subject  
20 matter jurisdiction to grant a divorce.  
21
- 22 8. Ahed Said Senjab and Mohamad Abulhakim Alhulaibi are  
23 nonimmigrants. Based on decisional law from the United States  
24 Supreme Court, and the Ninth Circuit Court of Appeals, federal law will  
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1           either allow or prohibit a nonimmigrant visa holder to establish  
2           residency or domicile.

3  
4       9.     The Immigration and Nationality Act imposes limits on a state freedom  
5           to define domicile. *Park v. Barr*, 946 F.3d 1096 (2020).

6  
7       10.    The federal law, prohibiting a nonimmigrant from establishing domicile,  
8           continues even if a visa is overstayed. *Park v. Barr*, 946 F.3d 1096  
9           (2020).    In *Park*, Woul Park, a nonimmigrant, came to the United  
10          States on a B-2 Visa, and stayed in the United States after the lawful  
11          status had lapsed. The Ninth Circuit Court of Appeals held that Woul  
12          Park was precluded from establishing lawful domicile in California by  
13          operation of federal law.

14  
15  
16       11.    The United States Supreme Court, in *Toll v. Moreno*, 458 US 1 (1982),  
17          held that because Congress expressly allowed a nonimmigrant with a  
18          G-4 visa to establish domicile to obtain in-state college tuition, state  
19          law was precluded under the Supremacy Clause of the United States  
20          Constitution.

21  
22  
23       12.    Foreign students pursuing academic studies are classified as F-1.  
24          Dependents of holders of an F-1 visa are classified as F-2 spouses or  
25          dependents. The immigration status of an F-2 dependent is dependent  
26          upon the F-1 student.

- 1 13. Under federal law, nonimmigrants that come to the United States  
2 through F-1 and F-2 visas are required to maintain a residence in their  
3 country of citizenship with no intention of abandoning it.  
4
- 5 14. Ahed Said Senjab and Mohamad Abulhakim Alhulaibi were permitted  
6 to enter the United States on an express condition not to abandon the  
7 foreign residence.  
8
- 9 15. Congress has not permitted Ahed Said Senjab and Mohamad  
10 Abulhakim Alhulaibi to lawfully form a subjective intent to remain in  
11 the United States.  
12
- 13 16. The Immigration and Nationality Act prevents Ahed Said Senjab and  
14 Mohamad Abulhakim Alhulaibi from establishing the requisite intent to  
15 remain in the United States/Nevada.  
16
- 17 17. Congress expressly conditioned admission to the United States through  
18 F-1 and F-2 visas on a stated intention not to abandon the foreign  
19 residence.  
20
- 21 18. Ahed Said Senjab's subjective intent to make Nevada her home is  
22 precluded by Congress' definition of the nonimmigrant classification.  
23
- 24 19. This court concludes that Nevada lacks subject matter jurisdiction to  
25 grant a divorce.  
26

27 /////

1 Therefore,

2 **ORDER**

3  
4 **IT IS HEREBY ORDERED** that Mohamad Abulhakim Alhulaibi's  
5 motion to dismiss is granted.  
6

7 **IT IS FURTHER ORDERED** that this case is dismissed and closed with  
8 the entry of this order.  
9

10 Dated this 17th day of June, 2020

11 

12 03B A97 1706 ED86  
13 T. Arthur Ritchie  
14 DISTRICT COURT JUDGE  
15 DEPARTMENT H  
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DISTRICT COURT  
CLARK COUNTY, NEVADA

Ahed Said Senjab, Plaintiff

CASE NO: D-20-606093-D

vs.

DEPT. NO. Department H

Mohamad Abulhakim Alhulaibi,  
Defendant.

**AUTOMATED CERTIFICATE OF SERVICE**

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Findings of Fact, Conclusions of Law and Judgment was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Envelope ID: 6195153

Service Date: 6/17/2020

April Green, Esq.

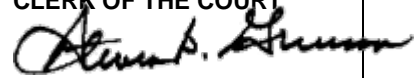
asgreen@lacs.n.org

Aileen Yeo

AYeo@lacs.n.org

David Markman

David@MarkmanLawfirm.com



1 NEOJ

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

9 \*\*\*

10 AHED SAID SENJAB,

11 Plaintiff,

12 vs.

13 MOHAMAD ABULHAKIM

14 ALHULAIBI,

15 Defendant.

CASE NO.: D-20-606093-D  
DEPARTMENT H

16  
17 **NOTICE OF ENTRY OF ORDER**

18 TO: ALL PARTIES AND/OR THEIR ATTORNEYS

19  
20 Please take notice that the Findings of Fact, Conclusions of Law and Judgment  
21 from the June 17, 2020 hearing was prepared and filed by the court. A copy of  
22 the Findings of Fact, Conclusions of Law and Judgment is attached hereto, and  
23 the following is a true and correct copy thereof.  
24

25 I hereby certify that on or about the file stamp date the foregoing Notice of  
26 Entry of Order was:  
27  
28

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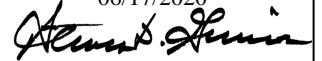
☒ E-Served pursuant to NEFCR 9; or mailed, via first-class mail, postage  
fully prepaid to:

April S. Green, Esq. for  
PLAINTIFF

David Markman, Esq. for  
DEFENDANT

*Katrina Rausch*

Katrina Rausch  
Judicial Executive Assistant  
Department H



CLERK OF THE COURT

1 FFCL  
2  
34 DISTRICT COURT  
5 FAMILY DIVISION  
6 CLARK COUNTY, NEVADA  
7  
8  
9

10 AHED SAID SENJAB,

CASE NO. D-20-606093-D

11 Plaintiff,

DEPT NO. H

12 vs.

13 MOHAMAD ABULHAKIM

Date of Hearing: June 16, 2020

14 ALHULAIBI,

Time of Hearing: 9:00 a.m.

15 Defendant.  
1617 **FINDINGS OF FACT, CONCLUSIONS OF LAW,**  
18 **DECISION AND ORDER**  
1920 This matter came on for hearing before Art Ritchie, District Court Judge,  
21 Department H. Plaintiff was represented by her attorneys, Legal Aid Center of  
22 Southern Nevada, and April S. Green, Esq. Defendant was represented by his  
23 attorneys, Markman Law, and David Markman, Esq. This court considered the  
24 papers and pleadings, the arguments of counsel, and for good cause stated in this  
25 order, grants Mohamad Abulhakim Alhulaibi's motion to dismiss.  
26  
27  
28

1           **I. BACKGROUND**  
2

3           This is a divorce case to dissolve a marriage between Ahed Said Senjab  
4 and Mohamad Abulhakim Alhulaibi. Ms. Senjab and Mr. Alhulaibi are citizens  
5 of Syria. They married in Saudi Arabia on February 17, 2018. The parties have  
6 one minor child, Ryan Mohamad Alhulaibi, who was born on February 16, 2019.  
7

8           Mohamad Abulhakim Alhulaibi obtained an F-1 Visa and came to the United  
9 States to attend graduate school at UNLV in 2018. Mr. Alhulaibi alleged that  
10 Ahed Said Senjab applied for an F-2 Visa in August, 2018, and that an F-2 Visa  
11 was granted to her and the parties' child at the end of 2019. In December, 2019,  
12 Mr. Alhulaibi returned to Saudi Arabia after the fall semester. Mr. Alhulaibi  
13 alleged that he purchased round trip airline tickets on Turkish Airlines for  
14 himself, Ahed Said Senjab, and the parties' child for travel to Nevada on January  
15 13, 2020 with a return flight to Saudi Arabia on June 18, 2020.  
16  
17

18           The parties and their child arrived in Las Vegas, Nevada, on January 13, 2020.  
19  
20 On February 14, 2020, Ahed Said Senjab filed an Application for Protective  
21 Order, assigned Case No. T-20-203688-T. The Ex-Parte Application was  
22 granted, and the matter was continued for consideration of an extension of the  
23 order. The matter was heard on March 17, 2020 and on March 30, 2020. The  
24 Hearing Master heard testimony from the parties and argument from counsel.  
25  
26  
27  
28

1 The court granted the request and extended the protective order until February 14,  
2 2021. The Extended Protective Order was filed on March 30, 2020 and it  
3 contains custody orders defining Ms. Senjab's physical custody time with Ryan  
4 as Monday at 10:00 a.m. through Friday at 3:00 p.m., and Mr. Alhulaibi's  
5 physical custody time with Ryan as Friday at 3:00 p.m. though Monday at 10:00  
6 a.m.  
7  
8

9  
10 Ahed Said Senjab filed a Complaint for Divorce on March 24, 2020. Ms.  
11 Senjab seeks a divorce, child custody and support orders, and spousal support.  
12 Mohamad Abulhakim Alhulaibi was served on March 25, 2020. Mr. Alhulaibi's  
13 Motion to Dismiss was filed on April 14, 2020. Ms. Senjab filed her Opposition  
14 on April 24, 2020 and Mr. Alhulaibi's Reply to Opposition was filed on May 13,  
15 2020. Ms. Senjab filed Supplemental Exhibits on May 18, 2020 and on May 20,  
16 2020.  
17  
18

19 The matter was heard on May 20, 2020. The parties appeared by telephone,  
20 with counsel. Because of the timing of Plaintiff's filings, and because the court  
21 requested additional briefing, the matter was continued to June 16, 2020.  
22  
23

24 Ahed Said Senjab filed a Memoranda of Law on June 8, 2020 and Mohamad  
25 Abulhakim Alhulaibi filed a Supplemental Brief on June 8, 2020. On June 11,  
26  
27  
28

1 2020, Ms. Senjab filed a third Supplemental Exhibit. The parties were present by  
2 telephone and represented by counsel at the hearing on June 16, 2020.  
3

## 4 **II. LEGAL STANDARD**

5  
6 Subject matter jurisdiction is the power of the court to decide a particular  
7 type of controversy. A party may file a motion asserting the defense of lack of  
8 subject-matter jurisdiction pursuant to NRCP 12(b)(1). The court should dismiss  
9 a case when a party fails to state a claim upon which relief can be granted. If a  
10 court determines at any time that it lacks subject-matter jurisdiction, the court  
11 must dismiss the action. NRCP 12(h)(3).  
12  
13

## 14 **III. FINDINGS AND CONCLUSIONS**

- 15  
16 1. For this Nevada court to have subject matter jurisdiction to grant a  
17 divorce, one of the parties must be a bona fide resident of the state of  
18 Nevada.  
19  
20 2. NRS 125.020 (e) provides that the district court has jurisdiction to grant  
21 a divorce if one of the parties has resided 6 weeks in the state before the  
22 suit was brought.  
23  
24 3. Residence is synonymous with domicile. Physical presence, together  
25 with intent, constitutes bona fide residence for divorce jurisdiction.  
26 *Aldabe v. Aldabe*, 84 Nev 392, 441 P.2d 691 (1968).  
27  
28

- 1 4. Ahed Said Senjab has the burden to prove that she or Mohamad  
2 Abulhakim Alhulaibi is a bona fide resident of the state of Nevada for  
3 this court to grant a divorce.  
4
- 5 5. Ahed Said Senjab and Mohamad Abulhakim Alhulaibi have been  
6 physically present in the state of Nevada for at least 6 weeks prior to the  
7 filing of this divorce case.  
8
- 9 6. This court finds that pursuant to state law, undocumented immigrants  
10 who physically live in Nevada have been able to access Nevada courts  
11 to obtain a divorce so long as they have been physically present in  
12 Nevada, and so long as they establish a subjective intention to make  
13 Nevada their home.  
14
- 15 7. The Ninth Circuit Court of Appeals, in *Park v. Barr*, 946 F.3d 1096  
16 (2020), held that federal law has preempted state law. The holding in  
17 *Park*, bars nonimmigrants who come to the United States on a visa  
18 issued pursuant to Title 8 of the United States Code from establishing  
19 the subjective intent that is required to give this Nevada court subject  
20 matter jurisdiction to grant a divorce.  
21
- 22 8. Ahed Said Senjab and Mohamad Abulhakim Alhulaibi are  
23 nonimmigrants. Based on decisional law from the United States  
24 Supreme Court, and the Ninth Circuit Court of Appeals, federal law will  
25  
26  
27  
28



1           either allow or prohibit a nonimmigrant visa holder to establish  
2           residency or domicile.

3  
4       9.     The Immigration and Nationality Act imposes limits on a state freedom  
5           to define domicile. *Park v. Barr*, 946 F.3d 1096 (2020).

6  
7       10.    The federal law, prohibiting a nonimmigrant from establishing domicile,  
8           continues even if a visa is overstayed. *Park v. Barr*, 946 F.3d 1096  
9           (2020).    In *Park*, Woul Park, a nonimmigrant, came to the United  
10          States on a B-2 Visa, and stayed in the United States after the lawful  
11          status had lapsed. The Ninth Circuit Court of Appeals held that Woul  
12          Park was precluded from establishing lawful domicile in California by  
13          operation of federal law.

14  
15  
16       11.    The United States Supreme Court, in *Toll v. Moreno*, 458 US 1 (1982),  
17          held that because Congress expressly allowed a nonimmigrant with a  
18          G-4 visa to establish domicile to obtain in-state college tuition, state  
19          law was precluded under the Supremacy Clause of the United States  
20          Constitution.

21  
22  
23       12.    Foreign students pursuing academic studies are classified as F-1.  
24          Dependents of holders of an F-1 visa are classified as F-2 spouses or  
25          dependents. The immigration status of an F-2 dependent is dependent  
26          upon the F-1 student.

- 1 13. Under federal law, nonimmigrants that come to the United States  
2 through F-1 and F-2 visas are required to maintain a residence in their  
3 country of citizenship with no intention of abandoning it.  
4
- 5 14. Ahed Said Senjab and Mohamad Abulhakim Alhulaibi were permitted  
6 to enter the United States on an express condition not to abandon the  
7 foreign residence.  
8
- 9 15. Congress has not permitted Ahed Said Senjab and Mohamad  
10 Abulhakim Alhulaibi to lawfully form a subjective intent to remain in  
11 the United States.  
12
- 13 16. The Immigration and Nationality Act prevents Ahed Said Senjab and  
14 Mohamad Abulhakim Alhulaibi from establishing the requisite intent to  
15 remain in the United States/Nevada.  
16
- 17 17. Congress expressly conditioned admission to the United States through  
18 F-1 and F-2 visas on a stated intention not to abandon the foreign  
19 residence.  
20
- 21 18. Ahed Said Senjab's subjective intent to make Nevada her home is  
22 precluded by Congress' definition of the nonimmigrant classification.  
23
- 24 19. This court concludes that Nevada lacks subject matter jurisdiction to  
25 grant a divorce.  
26

27 /////

1 Therefore,

2 **ORDER**

3  
4 **IT IS HEREBY ORDERED** that Mohamad Abulhakim Alhulaibi's  
5 motion to dismiss is granted.  
6

7 **IT IS FURTHER ORDERED** that this case is dismissed and closed with  
8 the entry of this order.  
9

10 Dated this 17th day of June, 2020

11 

12 03B A97 1706 ED86  
13 T. Arthur Ritchie  
14 DISTRICT COURT JUDGE  
15 DEPARTMENT H  
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DISTRICT COURT  
CLARK COUNTY, NEVADA

Ahed Said Senjab, Plaintiff

CASE NO: D-20-606093-D

vs.

DEPT. NO. Department H

Mohamad Abulhakim Alhulaibi,  
Defendant.

**AUTOMATED CERTIFICATE OF SERVICE**

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Findings of Fact, Conclusions of Law and Judgment was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Envelope ID: 6195153

Service Date: 6/17/2020

April Green, Esq.

asgreen@lacs.n.org

Aileen Yeo

AYeo@lacs.n.org

David Markman

David@MarkmanLawfirm.com

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint**

**COURT MINUTES**

**May 20, 2020**

---

D-20-606093-D      Ahed Said Senjab, Plaintiff  
vs.  
Mohamad Abulhakim Alhulaibi, Defendant.

---

**May 20, 2020      10:00 AM      All Pending Motions**

**HEARD BY:** Ritchie, T. Arthur, Jr.

**COURTROOM:** RJC Courtroom 03G

**COURT CLERK:** Kathy Prock

**PARTIES:**

Ahed Senjab, Plaintiff, present	April Green, Attorney, present
Mohamad Alhulaibi, Defendant, present	David Markman, Attorney, present
Ryan Alhulaibi, Subject Minor, not present	

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

- DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTIONAL REQUIREMENTS...PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTIONAL REQUIREMENTS

Court interpreter (Arabic), Omar J. Rifad, was present on behalf of the Plaintiff.

Both parties, Court Interpreter Rifad, Attorney Green, and Attorney Markman appeared telephonically, pursuant to the Administrative Orders for public safety.

Court stated it reviewed the papers and pleadings in this case and the TPO case (T-203688-T). Both counsel stated there are no agreements.

Court reviewed the history of the case. Court stated it saw no Jurisdiction Enforcement Act Affidavit.

Discussion regarding the timeline of when Plaintiff alleges physical presence in Nevada, with intent to make it her home, and non-immigration alien not having a proper domicile and cannot get divorced.

PRINT DATE:	07/17/2020	Page 1 of 6	Minutes Date:	May 20, 2020
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

Court stated it has jurisdiction to grant the divorce. Further, Nevada Courts are to have subject matter jurisdiction over custody matters.

Attorney Markman stated Defendant believes the home of the child is Saudi Arabia, for the reason they were in Saudi Arabia six months prior to the filing. Attorney Green stated Defendant has no intention to return to Saudi Arabia. Court stated Nevada is not the home state and Plaintiff needs to walk through the elements of custody. Attorney Markman stated they never had such intent to stay.

Argument regarding people getting divorced all the time, who are not legal, however, reside here.

Court noted there is a Protection Order that has been extended to February, 2021 and that Protection Order provided for a split week custody schedule. Attorney Markman stated the abuse allegations have not been substantiated. Further, Defendant admitted it was all verbal, and then alleged physical abuse. Court stated the Protection Order is a valid Order.

Court stated it can have temporary, emergency jurisdiction. Attorneys Markman and Green stated there are no other cases and no other action.

Attorney Markman stated Defendant was waiting for her brother-in-law to come from the State of Maryland, pick up her and the child, and take them to Maryland. Attorney Markman requested the child be on the ticket to return home with Defendant.

Attorney Green stated Attorney Markman's Reply was way beyond the scope of Defendant's Motion.

Court stated this case has many layers of analysis for residency of Plaintiff, custody jurisdiction, personal jurisdiction over Defendant, and jurisdiction to grant the divorce. Further, every issue involves legal and factual questions.

Court stated it will allow Plaintiff to supplement the Memorandum of law to address each of these issues.

COURT ORDERED, the following:

Defendant's MOTION and Plaintiff's OPPOSITION shall be CONTINUED.

The DEADLINE for the BRIEFS to be FILED is 6/8/2020. The Court will read the cases Attorney Markman cited and Attorney Green's SUPPLEMENT.

CONTINUED TO: 6/16/2020 9:00 AM - Regional Justice Center, Courtroom 3G

**INTERIM CONDITIONS:**

PRINT DATE:	07/17/2020	Page 2 of 6	Minutes Date:	May 20, 2020
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**Notice:** Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

**FUTURE HEARINGS:**

Jun 16, 2020 9:00AM Motion  
Defendant's Motion to Dismiss for Lack of Jurisdictional Requirements (Cont. from 5/20/2020)  
RJC Courtroom 03G Ritchie, T. Arthur, Jr.

Jun 16, 2020 9:00AM Opposition & Countermotion  
Pltf's Opposition To Deft's Motion To Dismiss For Lack Of Jurisdictional Requirements (Cont. from 5/20/2020)  
RJC Courtroom 03G Ritchie, T. Arthur, Jr.

PRINT DATE:	07/17/2020	Page 3 of 6	Minutes Date:	May 20, 2020
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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint**

**COURT MINUTES**

**June 16, 2020**

---

D-20-606093-D      Ahed Said Senjab, Plaintiff  
vs.  
Mohamad Abulhakim Alhulaibi, Defendant.

---

**June 16, 2020      9:00 AM      All Pending Motions**

**HEARD BY:** Ritchie, T. Arthur, Jr.

**COURTROOM:** RJC Courtroom 03G

**COURT CLERK:** Kathy Prock

**PARTIES:**

Ahed Senjab, Plaintiff, present	April Green, Attorney, present
Mohamad Alhulaibi, Defendant, present	David Markman, Attorney, present
Ryan Alhulaibi, Subject Minor, not present	

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

- DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTIONAL REQUIREMENTS...PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTIONAL REQUIREMENTS

Both parties, Attorney Green, and Attorney Markman appeared telephonically, pursuant to the Administrative Orders for public safety.

Court interpreter (Arabic), Saad Musa, appeared telephonically on behalf of the Plaintiff.

Court reviewed the history of the case. Court stated it has reviewed the Motion, Response, Reply, and the additional Memorandum, filed 6/8/2020. Further, a review of the papers does not show contested facts.

Court noted the parties were married on 2/17/2018. Further, it is not disputed that Plaintiff was here on a student F1 Visa to attend school, he applied for the Visa in 2018, and it was granted in 2019. Further, it is not contested that Plaintiff purchased air travel and traveled to the United States with his wife and child on 1/13/2020. Court noted this is not the home state of the child.

PRINT DATE:	07/17/2020	Page 4 of 6	Minutes Date:	May 20, 2020
-------------	------------	-------------	---------------	--------------

**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**



Court noted there is a Protection Order for domestic violence (case no. T-20-203688-T), Plaintiff being the Applicant, the Protection Order was heard and extended, and is in effect until 2/14/2021. Attorney Markman stated Defendant denies all of Plaintiff's allegations in her application.

Court stated it does not appear contested that Plaintiff was present in Nevada from March, 2020, and she has resided here six weeks prior to filing, and she was here on an F2 Visa (student Visa dependant).

Argument regarding whether Nevada has subject matter jurisdiction, whether Plaintiff had the intent to remain in the State of Nevada, whether Plaintiff met the requirements of Nevada law to file for divorce, whether this Court has jurisdiction over the child, and Plaintiff having the right to citizenship through the Violence Against Women Act.

Court noted Federal law preempts Nevada law.

COURT ORDERED, the following:

Matter TAKEN UNDER ADVISEMENT on the Motion To Dismiss, and all other issues will be incorporated in the decision.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

PRINT DATE:	07/17/2020	Page 5 of 6	Minutes Date:	May 20, 2020
-------------	------------	-------------	---------------	--------------

**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint**

**COURT MINUTES**

June 22, 2020

---

D-20-606093-D      Ahed Said Senjab, Plaintiff  
vs.  
Mohamad Abulhakim Alhulaibi, Defendant.

---

**June 22, 2020      11:00 AM      Minute Order**

**HEARD BY:** Ritchie, T. Arthur, Jr.

**COURTROOM:** RJC Courtroom 03G

**COURT CLERK:** Kathy Prock

**PARTIES:**

Ahed Senjab, Plaintiff, not present	April Green, Attorney, not present
Mohamad Alhulaibi, Defendant, not present	David Markman, Attorney, not present
Ryan Alhulaibi, Subject Minor, not present	

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

- For the reasons expressed in the FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER filed June 18, 2020, COURT ORDERED,

Mohamad Abulhakim Alhulaibi's Motion To Dismiss is GRANTED.

COURT FURTHER ORDERED, this case is DISMISSED and CLOSED with the entry of this Order.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

PRINT DATE:	07/17/2020	Page 6 of 6	Minutes Date:	May 20, 2020
-------------	------------	-------------	---------------	--------------

**Notice:** Journal entries are prepared by the courtroom clerk and are not the official record of the Court.



**EIGHTH JUDICIAL DISTRICT COURT CLERK'S OFFICE**  
**NOTICE OF DEFICIENCY**  
**ON APPEAL TO NEVADA SUPREME COURT**

**MARSHAL S. WILICK, ESQ.**  
**3591 E. BONANZA RD., SUITE 200**  
**LAS VEGAS, NV 89110-2101**

**DATE: July 17, 2020**  
**CASE: D-20-606093-D**

**RE CASE:** AHED SAID SENJAB vs. MOHAMAD ABULHAKIM ALHULAIBI

NOTICE OF APPEAL FILED: July 16, 2020

**YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.**

**PLEASE NOTE: DOCUMENTS **NOT** TRANSMITTED HAVE BEEN MARKED:**

- ☐ \$250 – Supreme Court Filing Fee (Make Check Payable to the Supreme Court)\*\*
  - If the \$250 Supreme Court Filing Fee was not submitted along with the original Notice of Appeal, it must be mailed directly to the Supreme Court. The Supreme Court Filing Fee will not be forwarded by this office if submitted after the Notice of Appeal has been filed.
- ☐ \$24 – District Court Filing Fee (Make Check Payable to the District Court)\*\*
- ☐ \$500 – Cost Bond on Appeal (Make Check Payable to the District Court)\*\*
  - NRAP 7: Bond For Costs On Appeal in Civil Cases
- ☒ Case Appeal Statement
  - NRAP 3 (a)(1), Form 2
- ☐ Order
- ☐ Notice of Entry of Order

---

**NEVADA RULES OF APPELLATE PROCEDURE 3 (a) (3) states:**

"The district court clerk must file appellant's notice of appeal despite perceived deficiencies in the notice, including the failure to pay the district court or Supreme Court filing fee. The district court clerk shall apprise appellant of the deficiencies in writing, and shall transmit the notice of appeal to the Supreme Court in accordance with subdivision (g) of this Rule with a notation to the clerk of the Supreme Court setting forth the deficiencies. Despite any deficiencies in the notice of appeal, the clerk of the Supreme Court shall docket the appeal in accordance with Rule 12."

***Please refer to Rule 3 for an explanation of any possible deficiencies.***

---

***\*\*Per District Court Administrative Order 2012-01, in regards to civil litigants, "...all Orders to Appear in Forma Pauperis expire one year from the date of issuance." You must reapply for in Forma Pauperis status.***

# Certification of Copy

State of Nevada }  
County of Clark } SS:

I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, does hereby certify that the foregoing is a true, full and correct copy of the hereinafter stated original document(s):

NOTICE OF APPEAL; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; FINDINGS OF FACT, CONCLUSIONS OF LAW, DECISION AND ORDER; NOTICE OF ENTRY OF ORDER; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

AHED SAID SENJAB,

Plaintiff(s),

vs.

MOHAMAD ABULHAKIM ALHULAIBI,

Defendant(s),

Case No: D-20-606093-D

Dept No: H

now on file and of record in this office.

**IN WITNESS THEREOF**, I have hereunto  
Set my hand and Affixed the seal of the  
Court at my office, Las Vegas, Nevada  
This 17 day of July 2020.

Steven D. Grierson, Clerk of the Court



Heather Ungermann, Deputy Clerk