

Jeffrey Reed,

Petitioner,

vs.

The Eighth Judicial District Court of the
State of Nevada, in and for the County of
Clark, and the Department “H” District
Court Judge T. Arthur Ritchie, Jr.,

Respondents,

Alecia Reed nka Draper, and Alecia
Draper, as Conservator of Emily Reed,

Real Parties in Interest.

VOLUME II OF V

Docket 81581 Document 2020-28540

INDEX OF APPENDIX

Date	Description of Document	Vol.	Page Nos.
7/21/2017	Plaintiff's Opposition to Defendant's Motion to Reset Child Support Based on Emancipation of a Child and Countermotion for Child Support for Disabled Child Et Al	II	0143 – 0377
8/24/2017	Defendant's Reply in Support of Motion to Reset Child Support Based Upon Emancipation of a Child and for Attorney s Fees and Costs and Opposition to Plaintiff's Countermotion for Child Support for Disabled Child Et Al	II	0378 – 0392

H&R Block ADVANTAGE®



H&R BLOCK

Prepared For:

JEFFREY A. REED

05/31/2017

Today's Savings

- * By participating in a qualified retirement plan through your employer this year and making your contributions with pretax dollars, you reduced your taxes by: \$712.00
- * In simple terms, the Marginal Tax Rate is the tax rate that you pay on your last dollar of taxable income. It is the highest federal tax bracket that affects your tax calculation. The Effective Tax Rate is the percentage of your total income that you paid in taxes. For 2016, your Marginal Tax Rate is 25% and your Effective Tax Rate is 18%.

Total Savings. **\$712.00**

Filing, Refund and Balance Due Information

Tax Return	efile	Refund / (Balance Due)	Summary	Message
Federal	Yes	\$1,890.00	Refund	\$1,890.00 See the Filing Checklist for instructions.

This H&R Block Advantage document provides information that could help you improve your tax and financial situation. Its contents should be considered in conjunction with information you receive from other sources that are familiar with your specific circumstances. Tax services offered through subsidiaries of HRB Tax Group, Inc.

H&R Block ADVANTAGE®

2016 Tax Return Summary

Federal Year over Year Comparison

INCOME	Year 2016	Year 2015	Change(\$)
Wages, salaries, tips	\$95,256	\$0	\$95,256
Total income	\$95,256	\$0	\$95,256
ADJUSTED GROSS INCOME			
Total income less total adjustments	\$95,256	\$0	\$95,256
TAXABLE INCOME			
Standard deductions	\$6,300	\$0	\$6,300
Exemptions	\$4,050	\$0	\$4,050
Taxable income	\$84,906	\$0	\$84,906
TAX COMPUTATION			
Income tax	\$17,003	\$0	\$17,003
Tax before credits	\$17,003	\$0	\$17,003
OTHER TAXES			
Total tax	\$17,003	\$0	\$17,003
PAYMENTS			
Federal withholding	\$18,893	\$0	\$18,893
Total payments	\$18,893	\$0	\$18,893
REFUND			
Overpayment	\$1,890	\$0	\$1,890
Refund due	\$1,890	\$0	\$1,890
OTHER COMPUTATIONS			
Alternative minimum taxable income	\$95,256	\$0	\$95,256
Marginal tax bracket	25%		
Effective tax bracket	18%		
Filing status	Single		

Form
1040EZ

Department of the Treasury - Internal Revenue Service

Income Tax Return for Single and
Joint Filers With No Dependents (99)

2016

OMB No. 1545-0074

JEFFREY A REED
9024 TONY RIDGE AVE
LAS VEGAS, NV 89148

Your social security number
- 3590

Spouse's social security number

▲ Make sure the SSN(s)
above are correct.

Presidential Election Campaign

Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund.

☐ You ☐ Spouse

Foreign country name

Foreign province/state/county

Foreign postal code

Income

Attach Form(s) W-2 here.

Enclose, but do not attach, any payment.

1 Wages, salaries, and tips. This should be shown in box 1 of your Form(s) W-2.

Attach your Form(s) W-2.

1 95,256.

2 Taxable interest. If the total is over \$1,500, you cannot use Form 1040EZ.

2

3 Unemployment compensation and Alaska Permanent Fund dividends (see instructions).

3

4 Add lines 1, 2, and 3. This is your adjusted gross income.

4 95,256.

5 If someone can claim you (or your spouse if a joint return) as a dependent, check the applicable box(es) below and enter the amount from the worksheet on page 2.

☐ You

☐ Spouse

If no one can claim you (or your spouse if a joint return), enter \$10,350 if single; \$20,700 if married filing jointly. See page 2 for explanation.

5 10,350.

6 Subtract line 5 from line 4. If line 5 is larger than line 4, enter - 0-.

This is your taxable income.

6 84,906.

Payments,
Credits,
and Tax

7 Federal income tax withheld from Form(s) W-2 and 1099.

7 18,893.

8a Earned income credit (EIC) (see instructions)

8a

b Nontaxable combat pay election.

8b

9 Add lines 7 and 8a. These are your total payments and credits.

9 18,893.

10 Tax. Use the amount on line 6 above to find your tax in the tax table in the instructions. Then, enter the tax from the table on this line.

10 17,003.

11 Health care: individual responsibility (see instructions) Full-year coverage ☒

11

12 Add lines 10 and 11. This is your total tax.

12 17,003.

Refund

Have it directly deposited! See instructions and fill in 13b, 13c, and 13d, or Form 8888.

13a If line 9 is larger than line 12, subtract line 12 from line 9. This is your refund.

If Form 8888 is attached, check here ☐

13a 1,890.

b Routing number

c

Type:

☐ Checking

☐ Savings

d Account number

Amount
You Owe

14 If line 12 is larger than line 9, subtract line 9 from line 12. This is the amount you owe. For details on how to pay, see instructions.

14

Third Party
Designee

Do you want to allow another person to discuss this return with the IRS (see instructions)? ☐ Yes. Complete below. ☒ No

Designee's name

Phone no.

Personal ID number

▶

▶

(PIN) ▶

Sign
Here

Joint return? See instructions.

Keep a copy for your records.

Under penalties of perjury, I declare that I have examined this return and, to the best of my knowledge and belief, it is true, correct, and accurately lists all amounts and sources of income I received during the tax year. Declaration of preparer (other than the taxpayer) is based on all information of which the preparer has any knowledge.

Your signature

Date

Your occupation

Daytime phone number

SALES

Spouse's signature. If a joint return, both must sign.

Date

Spouse's occupation

If the IRS sent you an ID Protection PIN, enter it here (see inst.)

Paid
Preparer
Use Only

Print/Type preparer's name

Preparer's signature

Date

Check ☐ if self-employed

PTIN

Firm's name ▶

Firm's EIN ▶

Firm's address ▶

Phone no.

KBA For Disclosure, Privacy Act, and Paperwork Reduction Act Notice, see instructions.

Form 1040EZ (2016)

1040EZ (2016)

FD1040EZ-1WV 1.2

Form Software Copyright 1996 - 2017 HRB Tax Group, Inc.

PET0372

EXHIBIT “G”

EXHIBIT “G”

EXHIBIT “G”

Alecia Draper
20762 Crestview Lane
Huntington Beach, CA 92646

Elizabeth

I am requesting that Adam Reed continue the current therapy treatment with his therapist Kyle Keffer. Adam began seeing Kyle in April of 2017 on a weekly basis for a 1 hour session.

Adam was placed in a 30 day treatment facility in 2014 for depression and anger issues. He has seen over 5 different therapists for continued depression and excessive weight gain from 2010- 2015. Adam experience physical, mental and emotional abuse by Allen Gorry and Carla Newlan from 2005- 2014. Allen and Carla were Jeff's care takers for the children. In 2015 Adam did not want to continue therapy treatment and it was decided by his therapist that it would be best for Adam to take a break from therapy until he was willing to engage on his own in treatment.

Adams grades and attendance began suffering in 2017 and he became more depressed after witnessing a panic attack/PTSD episode that required Emily to be removed from our home in an ambulance and rushed to emergency. A few months later Emily had another episode that was extremely scary for Adam and the entire family. Emily took the car and drove off after her therapy session and was missing for 7 hours. She did not take her cell phone and did not have a plan of returning for a few days. She did not know where she was going to go. Thankfully she showed up in Las Vegas at her father's work place and he had Emily call home. My husband and I drove to Vegas the following day to pick her up.

It was after this that Adam began missing class at school and I received a phone call from the school office. They recommended that Adam see a counselor because he was very depressed and struggling in school. Adam sent me a text message that I forwarded to Jeff on April 24th 2017. It read, "*Because we watched the drunk driving video and I started to cry because of the whole death thing because I thought of Emily so I just went home with Anthony everyone was asking me why I was crying and I didn't want to talk about it*"

PET0374

I cried during the assembly and then I was a little depressed about the whole I'm going to Utah thing When am I going to meet a counselor person Because I've been really stressed and I can't focus and I need someone to talk to." Kyle was recommended by Emily's therapist and has a very good reputation for working with young men. Adam was also watching a lot of pornography as a child and was introduced to this by Allen Gorry during his father's visitation time. I believe this has also contributed to Adams low self esteem and over eating.

Since Adam has been seeing Kyle he began attending all his classes. He was able to improve his grades from D's to C's. He has asked to continue seeing Kyle on a weekly basis because it's helping him and he likes having someone to talk to.

The therapy Adam is receiving is critical to his mental and physical well being. I am seeing a more positive change in Adams attitude and anger issues. I am requesting that Jeff Reed pay for 50% of the cost for therapy.

Thank you,

Alecia Draper

PET0375



Alecia Draper <aleciadraper@gmail.com>

(no subject)

1 message

7149161524@mms.att.net <7149161524@mms.att.net>

Mon, Apr 24, 2017 at 9:03 AM

To: aleciadraper@gmail.com, 1968jareed@gmail.com

Because we watched the drunk driving video and I started to cry because of the whole death thing because I thought of emily so I just went home with Anthony everyone was asking me why I was crying and I didn't want to talk about it I cried during the assembly and then I was still a little depressed about the whole I'm going to Utah thing When am I going to meet a counselor person Because I've been really stressed and I can't focus and I need someone to talk to The last text messages were from Adam. His primary doctor also recommends he go to counseling because he is very depressed. I got a referral from Elise, Emily's therapist. I will be sending you copies of the bills along with Anthony's recent medical bills to your email. I will also keep a history for the Nevada child support devision. Medical bills will need to follow the 30/30 rule. If your email has changed let me know. Adam has been missing classes and gone to the school counselor 2 times over the last month.

Geoffrey Draper

From: Alecia Draper [aleciadraper@gmail.com]
Sent: Tuesday, June 06, 2017 10:04 PM
To: Geoffrey Draper
Subject: Fwd:

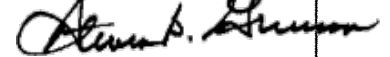
----- Forwarded message -----

From: <7149161524@mms.att.net>
Date: Tue, Jun 6, 2017 at 9:08 AM
Subject:
To: aleciadraper@gmail.com

Yes I do , I'm sorry he's in so much pain Chris Williams +1 (949) 975-1864 Kyle Keffer 949 7422665

6/6/2017

PET0377



1 **RPLY**

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 Attorneys for Defendant, Jeffrey Allen Reed

11 **DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 ALECIA ANN DRAPER,

14 Plaintiff,

15 v.

16 JEFFREY ALLEN REED,

17 Defendant.

Case No: 05D338668

Dept No: S

**REPLY IN SUPPORT OF MOTION
TO RESET CHILD SUPPORT
BASED UPON EMANCIPATION
OF A CHILD AND FOR
ATTORNEY FEES AND COSTS;
AND OPPOSITION TO
PLAINTIFF'S COUNTERMOTION
FOR CHILD SUPPORT FOR
DISABLED CHILD ET AL.**

Date of Hearing: August 28, 2017

Time of Hearing: 3:00 p.m.

18
19 COMES NOW the Defendant, Jeffrey Reed, by and through his attorney of
20 record, Amanda M. Roberts Esq., of Roberts Stoffel Family Law Group, and hereby
21 files this Reply in support of his Motion to Reset Child Support Based Upon

22 \ \ \

23 \ \ \

1 Emancipation of a Child and for Attorney Fees and Costs; and Opposition to Plaintiff's
2 Counter-motion for Child Support for Disabled Child.

3
4 DATED this 24th day of August, 2017.

5 **ROBERTS STOFFEL FAMILY LAW GROUP**

6
7 By: Amanda M. Roberts

8 Amanda M. Roberts, Esq.
9 State of Nevada Bar No. 9294
4411 S. Pecos Road
10 Las Vegas, Nevada 89121
11 PH: (702) 474-7007
12 FAX: (702) 474-7477
EMAIL: efile@lvfamilylaw.com
Attorneys for Defendant, Jeffrey Allen Reed

13 **MEMORANDUM OF POINTS AND AUTHORITIES**

14
15 **I.**

16 **Supplemental Statement of Facts**

17 The Parties, Alecia Reed ("Alecia") and Jeffrey Reed ("Jeff") were divorced
18 pursuant to a Decree of Divorce filed on August 5, 2005. At the time of their divorce,
19 the Parties had three (3) minor children, to wit: Emily Reed ("Emily"), born on
20 November 16, 1996; Anthony Reed ("Anthony"), born on May 25, 1999; and Adam
21 Reed ("Adam"), born on January 23, 2001. Two (2) of the children have since
22 emancipated. As such, the Parties have one remaining minor child, Adam.

23
24 Emily does not have, and never has had, a guardian/conservator, to the best of
25 Jeff's knowledge.
26

1 Emily's Alleged Disability

2 In her Opposition and Countermotion, Alecia alleges that the Court should
3
4 calculate child support at twenty-five percent (25%) of Jeff's gross monthly income
5 based upon child support for Adam, who is the last remaining minor child, and also the
6 Parties' adult daughter whom she alleges is disabled. As the Court may recall, Alecia
7 previously made a request for child support for Emily, beyond the age of majority. The
8 Court set the matter for an Evidentiary Hearing on the issue. However, prior to the
9 Evidentiary Hearing, on March 9, 2015, Alecia withdrew her request for child support
10 for Emily beyond the age of majority. Specifically, Alecia filed a "Notice of
11
12 Withdrawal of Request to Continue Child Support for Emily After High School
13 Graduation Due to Child's Disability & Request to Vacate Evidentiary Hearing." As a
14 result of that filing, the Evidentiary Hearing was vacated and no additional hearings
15 were held to address this issue. As such, the issue of Emily's disability and need for
16 support remain unresolved. The issue of whether Emily was disabled is a legal issue
17 that requires the Court to assess the matter and make a legal determination.
18
19

20
21 In her Opposition and Countermotion, Alecia provides a letter from Dr. Jennifer
22 Love Farrell ("Dr. Farrell"), purporting to provide a legal opinion regarding Emily's
23 alleged disability and the age when she alleged became disabled. **Dr. Farrell is not**
24 **qualified to provide a legal opinion. {EMPHASIS ADDED}** Dr. Farrell did not treat
25 Emily until last year, March of 2016, and should not be rendering any opinion regarding
26
27
28

1 her prior treatment(s). The proper person to render the medical opinion regarding prior
2 treatment is that treating physician. Moreover, based upon the information herein it
3 appears that Dr. Farrell is not apprised of all of the facts and information related to
4 Emily's current care.
5

6 Alecia alleges that Emily has been disabled since prior to her eighteenth (18th)
7 birthday and Alecia had to quit her job to care for Emily full time. Moreover, Alecia
8 alleges that Adam requires weekly therapy because he was mentally, emotionally and
9 physical abused. Alecia's statements are not consistent with the facts in this matter.
10 Alecia has painted a picture, that Emily is not able to function. This is simply not the
11 case.
12

13
14 Since turning eighteen (18) years old, Emily has enjoyed a full life. Immediately
15 after graduating from high school, Emily and her friends participated in a celebratory
16 vacation to Mexico. Upon information and belief, Alecia did not accompany Emily on
17 the vacation to Mexico, Jeff believes another adult went to watch over the entire group.
18 During this time, Emily was able to function without "full time" care of her Mother.
19

20 Since reaching the age of emancipation, Emily has continued to be able to do the
21 following activities:
22

- 23 • Emily graduated from high school with good grades;
- 24
25
26
27

- Emily has attended college classes;¹
- Emily has a driver's license;
- Emily drives a car that she has access to at Alecia's house;
- Emily was employed outside of the home;
- Emily is able to work in her church's coffeeshop; and
- Emily is left alone for long periods of time without supervision.

Most recently, Alecia recently purchased a business.² Alecia has been actively participating in the transition and management of the business. Jeff has repeatedly spoken with Emily and she has informed Jeff that she is home alone because Alecia is working. Emily has also informed Jeff that she has been working in the business.

At this point, Jeff disputes the claim that Emily is unable "to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment[.]" Jeff does not dispute that Emily receives Social Security Disability ("SSD"), but receipt of SSD does not mean that the recipient is unable to work. The Social Security Administration allows recipients to be employed and still receive benefits through SSD. In fact, the Social Security Administration has books that assist individuals receiving SSD with this very issue. As such, receipt of the SSD is not tantamount to a determination that Emily is handicap child beyond the age of majority.

¹ Although Jeff does not know for certain that Emily has attended college, Alecia indicates on a GoFundMe fundraising post, that "Emily desires to live independently, return to college, secure a job and eventually start a family of her own."

²² It is unknown when the purchase of the business was, but Alecia's filing with Secretary of State was in the first part of July 2017.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2
3
4
5
6
7
8
9

10
11
12
13
14
15
16
17
18

9
10
11
12
13

5
6

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

\\ \\ \\

\\ \\ \\

\\ \\ \\

27

28

1

2

3

4

5

6

7

1 Additionally, it should be noted that Adam's therapy did not begin until Jeff's
2 Counsel sent her correspondence regarding modifying child support. This is presumed
3 to be an attempt by Alecia to claim additional and continued therapy would be
4 necessary past his majority.
5

6 Contempt Request-
7

8 Alecia's request for Jeff to be held in contempt of Court is without merit and must
9 not be considered by the Court. *Awad v. Wright*, 106 Nev. 407, 794 P.2d 713 (1990).
10

11 **II.**
12 **REPLY**

13 A. Jeffrey's request to reset child support should be granted.
14

15 Child support is governed by Chapter 125B of the Nevada Revised Statutes.
16 Pursuant to *NRS* § 125B.200 (a) and (b) defines child as under the age of eighteen or
17 under the age of nineteen (19) and still enrolled in high school. Alecia does not dispute
18 that there is only one (1) remaining minor child, Adam. As such, Alecia should have
19 stipulated to reduce Jeff's child support based upon that one (1) remaining minor child.
20 Rather than agree, Alecia forced Jeff to file a Motion regarding that issue. Jeff's income
21 changes based upon his bonus structure and this year, he is not earning at the same level
22 as previous years. As such, Jeff's child support should be reduced to eighteen percent
23 (18%) of his gross monthly income based upon his three (3) most recent paycheck stubs.
24 Additionally, Jeff should be awarded attorney fees and costs for having to file this
25 Motion.
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

III.
OPPOSITION TO COUNTERMOTION

A. Alecia's request for child support for disabled child is without merit and must be denied.

NRS § 125B.110 provides that parents may be required to support their children, above the age of majority if the child is handicap. Handicap is defined as "inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment[.]" The obligation for support ends when the child is no longer handicap or is self-supporting which is defined as "if the child receives public assistance beyond the age of majority and that assistance is sufficient to meet the child's needs."

In this matter, it is believed that Emily receives SSD. However, receipt of SSD in and of itself does not meet the qualifications of handicap. The Court is required to determine the issue of whether Emily is able to "engage in any substantial gainful activity[.]" Jeff would assert that this is a factual issue and the Court should open discovery and set the matter for an Evidentiary Hearing to make this determination. Moreover, the Court must determine when the alleged disability occurred. This issue has never been fully addressed because Alecia previously withdrew her request for support past Emily's age of majority.

\\

\\

1 In this matter, it is Jeff's belief that Emily is currently receiving SSD. As such, it
2 is presumed until otherwise proven that Emily's SSD is sufficient to cover her needs.
3 Alecia has not established the amount of Emily's SSD. Alecia has also not established
4 that the amount Emily receives from SSD is not sufficient to provide for her needs.
5 Those needs are that of the Emily's and not Alecia's needs.
6

7 Thus, Jeff requests that until the Court hears the facts by way of an Evidentiary
8 Hearing, which was already previously set by the Court, that any request regarding
9 Emily be deferred. Jeff requests that the Court set an Evidentiary Hearing and open
10 discovery.
11

12
13 B. Alecia's request to split cost of Adam's therapy should be denied.

14 The Stipulation and Order filed on March 3, 2015, governs the issue of
15 unreimbursed medical expenses. That Order requires medical bills to be split equally
16 under the 30/30 Rule. However, if unreimbursed medical expenses are going to be in
17 excess of \$1,500.00 each year then the "medical treatment, counseling, or other necessary
18 treatment which is above the limit must be agreed to by Dad, and if not agreed to, shall be
19 returned to Court for decision." In this matter, Alecia is requesting the Court Ordered
20 that Jeff pay the fees above \$1,500.00 annually without first discussing the issue with
21 Jeff. Alecia has failed to explain to the Court the reason that a therapy provider covered
22 by insurance is not sufficient for Adam. Candidly, Alecia did not obtain the therapist for
23 Adam until Jeff's Counsel sent the correspondence attempting to settle this matter. This
24
25
26
27
28

1 reaction is extremely suspect. Jeff would argue that pursuant to *EDCR* § 7.60, this issue
2 is not ripe for the Court's consideration.

3
4 C. *Alecia's request for an Order to Show Cause Against Jeffrey should be*
5 *denied.*

6 Pursuant to *NRS* § 22.030 (2), requests for contempt **must** be accompanied by an
7 affidavit, which provides the "facts constituting contempt." The Court does not gain
8 jurisdiction over the issue of contempt unless an affidavit with "all essential material
9 facts" are presented to the Court. *Id* at 410. The failure to provide the affidavit cannot
10 be cured by proof at a hearing because until the affidavit is provided, the Court does not
11 have jurisdiction to hear the issue of contempt. *Id* at 409. Additionally, all contempt
12 proceedings are also governed by the holding in *Awad v. Wright*, 106 Nev. 407, 794
13 P.2d 713 (1990). In *Awad*, *supra*, the Nevada Supreme Court concluded that a
14 substantive affidavit, identifying the specific alleged violations of a Court Order, is
15 required in order to vest the District Court with the jurisdiction required to even
16 consider contempt of court. A non-specific affidavit (or, in this instance, a verification
17 disguised as an affidavit) is wholly insufficient to vest the court with jurisdiction to
18 consider contempt of court against Won. Furthermore, the *Awad* holding goes on to say
19 any affidavit defect cannot be subsequently cured.

20 \\ \\

21 \\ \\

22 \\ \\

1 In this matter, Alecia's Opposition and Countermotion is not supported by an
2 Affidavit. As such, Alecia's Counsel is precluded from arguing for contempt and the
3 Court is precluded from even setting this matter for an Evidentiary Hearing on the issue
4 of contempt.
5

6 D. Alecia's request to compel Jeffrey to pay all overdue medical bills should
7 be denied.

8 This is a non-issue, Jeff paid the amount that Alecia alleges needs to be paid for
9 Adam. The issue is the treatment she unilaterally sought for Adam, over \$1,500.00.
10 annually Jeff would argue that because she chose to incur the expenses over \$1,500.00
11 annually there is no obligation for Jeff to reimburse one-half of those costs because
12 Alecia failed to comply with their agreement and the Court Order.
13

14 E. Alecia's request for Jeffrey to pay Alecia's attorney's fees and costs should
15 be denied.

16 Jeff requests that the Court deny Alecia's request for attorney fees and costs
17 because she did not adequately attempt to resolve these issues prior to filing the
18 Countermotion. Furthermore, Alecia fraudulently completed her FDF. Alecia has a
19 business that she is currently working with the Parties' children [adult and minor].
20 Alecia knew or should of know she was under an obligation to present this information
21 to the Court. As such, Alecia's request should be denied pursuant to EDCR § 7.60.
22

23 \\\

24 \\\

V.
Conclusion

Therefore, based upon the foregoing, Jeffrey requests this Court:

1. Grant his request to reset his child support at eighteen percent (18%) of his gross monthly income based upon the emancipation.
2. Grant his request for attorney fees and costs.
3. Deny Alecia's request for child support of disabled child;
4. Deny Alecia's request to split Adam's therapy;
5. Deny Alecia's request for an Order to Show Cause against Jeffrey;
6. Deny Alecia's request to pay all overdue medical bills;
7. Deny Alecia's request for attorney's fees and costs, and
8. For any and all other relief the Court deems proper and just.


DATED this 24th day of August, 2017.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts
Amanda M. Roberts, Esq.
State of Nevada Bar No. 9294
4411 South Pecos Road
Las Vegas, Nevada 89121
PH: (702) 474-7007
FAX: (702) 474-7477
EMAIL: efile@lvfamilylaw.com
Attorneys for Defendant, Jeffrey Allen Reed

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Elizabeth Brennan Esq.
Elizabeth@brennanlawfirm.com
Attorney for Plaintiff, Alecia Draper

By: 
Employee of Roberts Stoffel Family Law Group