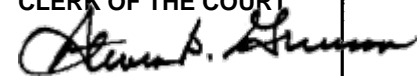


1 ALVERSON TAYLOR & SANDERS  
2 KURT R. BONDS, ESQ.  
3 Nevada Bar #6228  
4 TREVOR R. WAITE, ESQ.  
5 Nevada Bar #13779  
6 ALEXANDRE M. FAYAD, ESQ.  
7 Nevada Bar #15407  
8 6605 GRAND MONTECITO PKWY. #200  
9 LAS VEGAS, NEVADA 89149  
10 [efile@alversontaylor.com](mailto:efile@alversontaylor.com)  
11 (702) 384-7000  
12 *Attorneys for Respondent Adoptive Mother*

Electronically Filed  
11/13/2020 7:01 AM  
Steven D. Grierson  
CLERK OF THE COURT



Electronically Filed  
Nov 17 2020 01:53 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

EIGHTH JUDICIAL DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

10 IN RE THE CUSTODY VISITATION OF )  
11 JEREMIAH BLOUNT (DOB 1-19-2010); )  
12 KAYDI BLOUNT (DOB 2-19-2013 )

13 Minor Children )

CASE NO.: D-20-605933-F

DEPT. NO.: F

14 PAULA BLOUNT )  
15 Grandmother/Petitioner, )  
16 v. )

NOTICE OF APPEAL

17 JUSTIN BLOUNT, )  
18 GRETCHEN WHATONAME, )

19 Father/Respondent. )

20 v. )

21 STEPHANIE BLOUNT, )

22 Adoptive Mother/Respondent )

23 PLEASE TAKE NOTICE that Respondent, Stephanie Blount, by and through her  
24 attorneys of record, the law office of Alverson Taylor & Sanders, hereby appeals from the  
25 following order and/or judgments:  
26

- 27 1. Minute Order dated November 2, 2020 giving full faith and credit to the order from  
28 the Tribal Courts of Hualapai Tribe, Peach Springs, State of Arizona; and

KRB/26109

2. Any and all orders made appealable thereby.

DATED this 12<sup>th</sup> day of November, 2020.

ALVERSON TAYLOR & SANDERS



KURT R. BONDS, ESQ.

Nevada Bar #6228

TREVOR R. WAITE, ESQ.

Nevada Bar #13779

ALEXANDRE M. FAYAD, ESQ.

Nevada Bar #15407

6605 GRAND MONTECITO PKWY. #200

LAS VEGAS, NEVADA 89149

[efile@alversontaylor.com](mailto:efile@alversontaylor.com)

(702) 384-7000

*Attorneys for Respondent Adoptive Mother*

**CERTIFICATE OF SERVICE**

I certify that on November 13, 2020, the foregoing **NOTICE OF APPEAL** was served via Electronic Service through the Eighth Judicial District Court's Odyssey E-File and Serve System to:

~ All Parties on E-Service List ~



AN EMPLOYEE OF ALVERSON  
TAYLOR & SANDERS

N:\CLIENTS\26100\26109\pleading\26109 - Notice of Appeal Stephanie.docx

KRB/26109

**CASE SUMMARY****CASE NO. D-20-605933-F**

**Paula Blount, Plaintiff.**  
**vs.**  
**Justin Blount, Defendant.**

§  
 §  
 §  
 §

Location: **Department J**  
 Judicial Officer: **Hughes, Rena G.**  
 Filed on: **03/18/2020**

**CASE INFORMATION****Related Cases**

D-18-571209-O (1J1F Related - Rule 5.103)  
 D-19-585074-F (1J1F Related - Rule 5.103)

Case Type: **Registration of Foreign Custody**

Case Status: **03/18/2020 Open**

Case Flags: **Appealed to Supreme Court**






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

Case Number D-20-605933-F  
 Court Department J  
 Date Assigned 03/18/2020  
 Judicial Officer Hughes, Rena G.

**PARTY INFORMATION**

<b>Plaintiff</b>	<b>Blount, Paula</b> 3834 E. Lass Avenue Kingman, AZ 86409	<b>Willick, Marshal Shawn</b> Retained 702-438-4100(W)
<b>Defendant</b>	<b>Blount, Justin</b> 100 N. Wallace Drive Building 12, Apartment 156 Las Vegas, NV 89107	<b>Bonds, Kurt R.</b> Retained 702-384-7000(W)
<b>Subject Minor</b>	<b>Blount, Jeremiah</b>	<b>Pro Se</b>
	<b>Blount, Kaydi</b>	<b>Pro Se</b>

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

03/18/2020	 Foreign Judgment - NRS 125A Filed by: Plaintiff Blount, Paula Registration of Foreign Custody Orders
03/18/2020	 Notice Filed By: Plaintiff Blount, Paula Notice of Filing Registration of Foreign Custody Order
04/06/2020	 Acceptance of Service Filed by: Plaintiff Blount, Paula Acceptance of Service
04/30/2020	 Opposition Filed By: Defendant Blount, Justin; Respondent WHATONAME, GRETCHEN Father's Opposition to Registration of Foreign Custody Order
07/09/2020	 Reply to Opposition

# CASE SUMMARY

CASE NO. D-20-605933-F

Filed by: Plaintiff Blount, Paula  
*PATERNAL GRANDMOTHER S REPLY TO FATHER S OPPOSITION TO REGISTRATION OF FOREIGN CUSTODY ORDER*

07/17/2020



Errata

Filed By: Defendant Blount, Justin  
*Errata to Father's Opposition to Registration of Foreign Custody Order*

08/10/2020



Motion

Filed By: Defendant Blount, Justin; Guardian Blount, Stephanie  
*Bundled Filing -Motion to Invalidate/ Supplemental Exh*

08/10/2020



Motion

Filed By: Guardian Blount, Stephanie  
*Motion to Invalidate*

08/10/2020



Supplemental

Filed By: Guardian Blount, Stephanie  
*Supplemental Exhibits to Parental Motion To Invalidate*

08/12/2020



Notice of Hearing

*Notice of Hearing*

08/12/2020



Clerk's Notice of Nonconforming Document and Curative Action

*Nonconforming Document*

08/14/2020



Notice of Hearing

Filed By: Defendant Blount, Justin; Guardian Blount, Stephanie  
*Notice of Hearing*

08/20/2020



Proof of Service by Mail

Filed by: Defendant Blount, Justin; Guardian Blount, Stephanie  
*Proof of certified service*

08/20/2020



Proof of Service by Mail

Filed by: Defendant Blount, Justin; Guardian Blount, Stephanie  
*Proof of certified service*

08/20/2020



Proof of Service by Mail

Filed by: Defendant Blount, Justin; Guardian Blount, Stephanie  
*Proof of certified service*

08/20/2020



Proof of Service by Mail

Filed by: Defendant Blount, Justin; Guardian Blount, Stephanie  
*Proof of certified service*

08/20/2020



Proof of Service by Mail

Filed by: Defendant Blount, Justin; Guardian Blount, Stephanie  
*Proof of certified service*

09/01/2020



Opposition and Countermotion

Filed By: Plaintiff Blount, Paula  
*Parental Grandmother's Opposition to Motion to Invalidate and Countermotion for Attorney's Fees and Costs*

09/01/2020



Financial Disclosure Form

Filed by: Plaintiff Blount, Paula  
*General Financial Disclosure Form*

09/11/2020



Response

Filed By: Defendant Blount, Justin  
*Response to Countermotion for Attorney's Fees and Costs*

09/16/2020
















Response


Filed By: Guardian Blount, Stephanie  
*Guardian's Response to Opposition for Attorney's Fees and Cost (\*\*Bundle\*\*)(\*\*No Signature\*\*)*

# CASE SUMMARY

CASE NO. D-20-605933-F

09/16/2020	 Supplement Filed by: Guardian Blount, Stephanie <i>Supplemental Exhibits Response to opposition</i>
09/16/2020	 Opposition Filed By: Guardian Blount, Stephanie <i>Opposition to fees and costs</i>
09/16/2020	 Response Filed By: Guardian Blount, Stephanie <i>Mother's Response to Opposition for Motion to Invalidate</i>
09/16/2020	 Certificate of Service Filed by: Guardian Blount, Stephanie <i>Certificate of Service</i>
09/16/2020	 Certificate of Service Filed by: Guardian Blount, Stephanie <i>Certificate of Service</i>
09/17/2020	 Clerk's Notice of Nonconforming Document <i>Clerk's Notice of Nonconforming Document</i>
09/17/2020	 Errata Filed By: Guardian Blount, Stephanie <i>Errata</i>
09/17/2020	 Errata Filed By: Guardian Blount, Stephanie <i>Errata</i>
09/17/2020	 Errata Filed By: Guardian Blount, Stephanie <i>Errata</i>
09/23/2020	 Notice of Rescheduling of Hearing <i>Notice of Rescheduling of Hearing</i>
11/09/2020	 Notice of Appeal Filed By: Defendant Blount, Justin <i>Notice of Appeal</i>
11/10/2020	 Motion to Stay Filed by: Attorney Bonds, Kurt R.; Defendant Blount, Justin <i>Defendant's Motion to Stay Order Pending Appeal</i>
11/12/2020	 Notice of Hearing <i>Notice of Hearing</i>
11/13/2020	 Notice of Appeal Filed By: Guardian Blount, Stephanie <i>Notice of Appeal</i>


## **HEARINGS**

10/20/2020	<b>Motion</b> (3:00 PM) (Judicial Officer: Hughes, Rena G.) Events: 08/10/2020 Motion <i>Justin Blount and Stephanie Blount's Motion to Invalidate</i> <b>09/29/2020    Reset by Court to 10/20/2020</b> Decision Made; <i>Decision Made</i>
10/20/2020	 <b>Opposition &amp; Countermotion</b> (3:00 PM) (Judicial Officer: Hughes, Rena G.) Events: 09/01/2020 Opposition and Countermotion

EIGHTH JUDICIAL DISTRICT COURT

**CASE SUMMARY**

**CASE NO. D-20-605933-F**

	<p><i>Paternal Grandmother's Opposition to Motion to Invalidate and Countermotion for Attorney's Fees and Costs</i>  <b>09/29/2020    Reset by Court to 10/20/2020</b></p> <p>Decision Made;  <i>Decision Made</i></p>
10/20/2020	<p><b>Hearing (3:00 PM)</b> (Judicial Officer: Hughes, Rena G.)  Events: 09/16/2020 Response  <i>Stephanie Blount's Response to Countermotion for Attorney's Fees and Cost</i>  <b>09/29/2020    Reset by Court to 10/20/2020</b></p> <p>Decision Made;  <i>Decision Made</i></p>
10/20/2020	<p><b>All Pending Motions (3:00 PM)</b> (Judicial Officer: Hughes, Rena G.)</p>
11/02/2020	<p> <b>Minute Order (10:00 AM)</b> (Judicial Officer: Hughes, Rena G.)  Minute Order - No Hearing Held;  Journal Entry Details:  <i>MINUTE ORDER - NO HEARING HELD NRCP 1 and EDCR 1.10 state that the procedure in district courts shall be administered to secure efficient, speedy, and inexpensive determinations in every action. Pursuant to EDCR 2.23(c) and 5.501(b), this Court can consider a motion and issue a decision on the papers at any time without a hearing. Further, pursuant to EDCR 2.20(c), this Court can grant the requested relief if there is no opposition timely filed. On October 20, 2020 the Court held a hearing on the Motion to Invalidate, Plaintiff's Opposition and Countermotion, Justin Blount's Response to Countermotion, and Stephanie Blount's Response to Opposition. The Court took the matter under advisement. The Court's decision is as follows: THE COURT FINDS that this Court had a hearing on this matter on October 20, 2020 where this Court heard argument and took the matter under advisement. THE COURT FINDS that the grandmother, Pamela Blount domesticated a Foreign Judgment on March 18, 2020 with this Court. Petitioner is seeking full faith and credit from the Grandparent Custody and Visitation Order filed on January 20, 2020 from the Tribal Courts of Hualapai Tribe, Peach Springs, State of Arizona. The Respondent father objects to the requests. Several filings were made on the issues that the court has read in conjunction with the related cases in this matter. The court finds that throughout this action the parties have cited to ICWA The Indian Child Welfare Act. The court does not find that this is an ICWA issue because this is not the type of proceeding governed by ICWA .25 U.S.C sect 1911(1) (2012) vests tribes with exclusive jurisdiction over Indian child custody proceedings in certain situations. 25 U.S.C sect 1903 (1) (2012) lists the child custody proceedings that fall under ICWA. THE COURT FINDS that the related case, D-18-571209-O, went through appellate review and the Supreme Court of Nevada has weighed in on this case. That decision was filed on September 16, 2019. The Supreme court found that the UCCJEA was applicable in grandparent visitation cases. The decision goes on to read that the Tribal Court never relinquished jurisdiction over custody. Therefore the tribal court still has exclusive continuing jurisdiction in this case. While this Court did grant a step parent adoption in 2019, that proceeding did not divest the tribal court of UCCJEA jurisdiction over these children. UCCJEA proceedings were never held and the Tribal Courts of Hualapai Tribe, Peach Springs, State of Arizona never relinquished jurisdiction to this court. Therefore this COURT FINDS that the Tribal Courts of Hualapai Tribe, Peach Springs, State of Arizona still has continuing exclusive jurisdiction in this case and the grandmother, Pamela Blount domesticated a Foreign Judgment on March 18, 2020 with this Court wherein she asks for full faith and credit. Furthermore, petitioner properly lodged her request for grandparent visitation prior to the execution of the Decree of adoption when she commenced case D-18-571209-O, pursuant to Bopp v Lino 110 Nev. 1246 (1994.) It should be noted that the father's opposition notes several defects about the tribal proceedings and asks this court to invalidate the Tribal Court's orders. However those defects are not for this court to weigh in on and the father may consider appealing the court's decision. Based on the above, THIS COURT ORDERS that the orders from the Tribal Courts of Hualapai Tribe, Peach Springs, State of Arizona shall be given full faith and credit. Both sides shall bear their own fees and costs. Clerk's Note: A copy of today's Minute Order was emailed to Counsel at the email addresses on file.;</i>  <i>Minute Order - No Hearing Held</i></p>
01/12/2021	<p><b>Motion (2:00 PM)</b> (Judicial Officer: Hughes, Rena G.)  <i>Defendant's Motion to Stay Order Pending Appeal</i></p>

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Registration of Foreign  
Custody**

**COURT MINUTES**

November 02, 2020

D-20-605933-F      Paula Blount, Plaintiff.  
vs.  
Justin Blount, Defendant.

**November 02,      10:00 AM      Minute Order  
2020**

**HEARD BY:** Hughes, Rena G.

**COURTROOM:** Chambers

**COURT CLERK:** Sheila Bourne

**PARTIES:**

GRETCHEN WHATONAME, Respondent,	Pro Se
not present	
Jeremiah Blount, Subject Minor, not present	Pro Se
Justin Blount, Defendant, not present	Kurt Bonds, Attorney, not present
Kaydi Blount, Subject Minor, not present	Pro Se
Paula Blount, Plaintiff, not present	Marshal Willick, Attorney, not present
Stephanie Blount, Guardian, not present	Pro Se

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

- MINUTE ORDER - NO HEARING HELD

NRCP 1 and EDCR 1.10 state that the procedure in district courts shall be administered to secure efficient, speedy, and inexpensive determinations in every action. Pursuant to EDCR 2.23(c) and 5.501(b), this Court can consider a motion and issue a decision on the papers at any time without a hearing. Further, pursuant to EDCR 2.20(c), this Court can grant the requested relief if there is no opposition timely filed.

On October 20, 2020 the Court held a hearing on the Motion to Invalidate, Plaintiff s Opposition and Countermotion, Justin Blount s Response to Countermotion, and Stephanie Blount s Response to Opposition. The Court took the matter under advisement. The Court s decision is as follows:

PRINT DATE:	11/16/2020	Page 1 of 2	Minutes Date:	November 02, 2020
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

THE COURT FINDS that this Court had a hearing on this matter on October 20, 2020 where this Court heard argument and took the matter under advisement. THE COURT FINDS that the grandmother, Pamela Blount domesticated a Foreign Judgment on March 18, 2020 with this Court. Petitioner is seeking full faith and credit from the Grandparent Custody and Visitation Order filed on January 20, 2020 from the Tribal Courts of Hualapai Tribe, Peach Springs, State of Arizona. The Respondent father objects to the requests. Several filings were made on the issues that the court has read in conjunction with the related cases in this matter. The court finds that throughout this action the parties have cited to ICWA The Indian Child Welfare Act. The court does not find that this is an ICWA issue because this is not the type of proceeding governed by ICWA .25 U.S.C sect 1911(1) (2012) vests tribes with exclusive jurisdiction over Indian child custody proceedings in certain situations. 25 U.S.C sect 1903 (1) (2012) lists the child custody proceedings that fall under ICWA.

THE COURT FINDS that the related case, D-18-571209-O, went through appellate review and the Supreme Court of Nevada has weighed in on this case. That decision was filed on September 16, 2019. The Supreme court found that the UCCJEA was applicable in grandparent visitation cases. The decision goes on to read that the Tribal Court never relinquished jurisdiction over custody. Therefore the tribal court still has exclusive continuing jurisdiction in this case. While this Court did grant a step parent adoption in 2019, that proceeding did not divest the tribal court of UCCJEA jurisdiction over these children. UCCJEA proceedings were never held and the Tribal Courts of Hualapai Tribe, Peach Springs, State of Arizona never relinquished jurisdiction to this court.

Therefore this COURT FINDS that the Tribal Courts of Hualapai Tribe, Peach Springs, State of Arizona still has continuing exclusive jurisdiction in this case and the grandmother, Pamela Blount domesticated a Foreign Judgment on March 18, 2020 with this Court wherein she asks for full faith and credit. Furthermore, petitioner properly lodged her request for grandparent visitation prior to the execution of the Decree of adoption when she commenced case D-18-571209-O, pursuant to Bopp v Lino 110 Nev. 1246 (1994.)

It should be noted that the father s opposition notes several defects about the tribal proceedings and asks this court to invalidate the Tribal Court s orders. However those defects are not for this court to weigh in on and the father may consider appealing the court s decision. Based on the above, THIS COURT ORDERS that the orders from the Tribal Courts of Hualapai Tribe, Peach Springs, State of Arizona shall be given full faith and credit. Both sides shall bear their own fees and costs.

Clerk's Note: A copy of today's Minute Order was emailed to Counsel at the email addresses on file.

#### **INTERIM CONDITIONS:**

#### **FUTURE HEARINGS:**

PRINT DATE:	11/16/2020	Page 2 of 2	Minutes Date:	November 02, 2020
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**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

KURT R. BONDS, ESQ.  
6605 GRAND MONTECITO PKWY., #200  
LAS VEGAS, NV 89149

DATE: November 16, 2020  
CASE: D-20-605933-F

RE CASE: PAULA BLOUNT vs. JUSTIN BLOUNT

NOTICE OF APPEAL FILED: November 13, 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
  - *Previously paid Bonds are not transferable between appeals without an order of the court.*
- ☒ Case Appeal Statement
  - NRAP 3 (a)(1), Form 2
- ☒ Written Order
- ☒ Notice of Entry of Written 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; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

PAULA BLOUNT,

Plaintiff(s),

vs.

JUSTIN BLOUNT,

Defendant(s),

Case No: D-20-605933-F

Dept No: F

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 16 day of November 2020.

Steven D. Grierson, Clerk of the Court



Amanda Hampton, Deputy Clerk