

IN THE SUPREME COURT OF THE STATE OF NEVADA

JUSTIN BLOUNT; AND STEPHANIE
BLOUNT

Appellants,

v.

Paula Blount,

Respondent.

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)
) Electronically Filed
) May 13 2021 02:01 p.m.
) Elizabeth A. Brown
) Supreme Court No. 82095
) Clerk of Supreme Court
) District Court Case No.: D605933
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APPENDIX OF EXHIBITS FOR APPELLANTS' OPENING BRIEF

KURT R. BONDS, ESQ.

Nevada Bar No. 6228

TREVOR R. WAITE, ESQ.

Nevada Bar No. 13779

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Attorneys for Appellant

Justin Blount and Stephanie Blount

APPENDIX OF EXHIBITS FOR APPELLANTS' OPENING BRIEF

Ex.	Description	Bates No.
A	Tribal Order Vacating Temporary Custody Order and Child Support Order.	APP 0001 - APP 0004
B	Petition for Grandparent Visitation in Nevada court	APP 0005 - APP 0010
C	Motion for Temporary Orders	APP 0011 - APP 0029
D	Orders Denying/Dismissing Grandparent visitation and Awarding Attorney fees	APP 0030 - APP 0033
E	Minor Child Jeremiah reports sexual abuse by maternal grandmother, Gretna Whatanome to Desert Parkway	APP 004 - APP 0040
F	Notice of Appeal as to the District Court's Order dismissing the grandparent visitation petition and award of attorney fees	APP 0041 - APP 0044
G	ICWA notice of adoption served/received by Tribe	APP 0045 - APP 0052
H	Hualapai Tribal Order dismissing due to lack of Hualapai Tribal Jurisdiction	APP 0053 - APP 0055genevieve
I	Minute Order (NV Adoption) setting the intervention motion and opposition for oral argument	APP 0056 - APP 0058
J	Minute Order (NV Adoption) hearing continued to provide the tribe time to file a brief asserting jurisdiction.	APP 0059 - APP 0061
K	Tribe files a Notice of Withdraw of the Tribe's motion to intervene in the adoption and motion to Recognize Tribal Court Order from Tribal Case 2019-CC-004.	APP 0062 - APP 0064
L	Letter to Tribal Court from Trevor Waite, Esq., indicating Father terminated Alverson Taylor & Sanders representation with all matters before the Tribe	APP 0065 - APP 0069
M	Hearing in Tribal Court for Grandparent Custody (re: Gretna and Wilfred Whatoname) and resulting minute order	APP 0070 – APP 0071

N	District Court in the Nevada adoption proceeding issues a Minute Order related Tribe's failure to file the brief re jurisdiction as the Court ordered at the April 17, 2019 hearing	APP 0072 - APP 0074
O	Decree of Adoption	APP 0075 - APP 0078
P	Grandmother's petition for Grandparent Visitation is filed with the Tribe under Case 2019-CC-004	APP 0079 - APP 0084
Q	Notice of hearing in Hualapai Court issued and emailed to Trevor Waite, Esq., Tribal Case 2019-CC-004	APP 0085 - APP 0086
R	Grandparent Custody and Visitation Order, dated January 30, 2020	APP 0087 - APP 0092
S	Motion to Amend Custody Order filed in the Tribal Court, dated March 9, 2020	APP 0093 – APP 0094
T	Acceptance of service	APP 0095 - APP 0097
U	Order from Tribal Court granting Paula Blount joint custody with maternal grandparents, dated May 13, 2020	APP 0098 – APP 0099
V	District Court Order dated December 10, 2021	APP 0100 - APP 0105
W	Registration of Foreign Custody Order	APP 0106 -APP 0117
X	Notice of Appeal dated November 9 th , 2020	APP 0118- APP 0120

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Y	Notice of Appeal dated November 13 th , 2020	APP 0121 – APP 0123
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DATED this 13th of May, 2021.

ALVERSON TAYLOR & SANDERS



KURT R. BONDS, ESQ.

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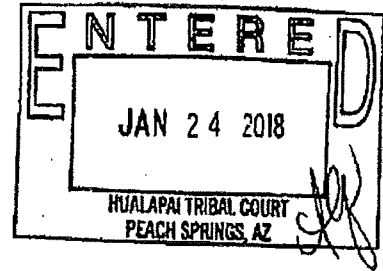
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Attorneys for Appellants

EXHIBIT A



**THE HUALAPAI TRIBAL COURT
HUALAPAI INDIAN RESERVATION
PEACH SPRINGS, ARIZONA**

In the Marriage of:

Case No.: 2016-DOM-001

**Gretchen Whatoname,
Petitioner**

**ORDER VACATING
TEMPORARY CUSTODY
ORDER AND CHILD
SUPPORT ORDER**

And

**Justin Blount,
Respondent.**

The Court has been advised through Respondent's Ex Parte Motion for Dismissal and Orders filed with the Court on January 11, 2018, of the untimely death of Petitioner Gretchen Whatoname. At a hearing on June 26, 2017, attended by both parties and their legal counsels, the Court entered a decree and order of dissolution of marriage between the parties. In addition, the Court issued a Temporary Custody Order awarding temporary custody of the parties' two minor children to Petitioner pending final determination of child custody. At a previous hearing on June 14, 2016, Respondent was ordered to pay to Petitioner child support in the amount of \$75.00 per child, \$150.00 total monthly. Respondent requests that the temporary custody and child support orders be vacated and that the Court dismiss all pending matters and close the case.

The Court finds that no previous order has terminated Respondent's parental rights. Because Petitioner was awarded temporary custody of the children and has since deceased, custody of the children should be restored to Respondent and the temporary custody order should be vacated. Additionally, the prior child support order should also be vacated and Respondent's

1 child support obligation should be terminated. However, the Court notes that on April 18, 2017,
2 Respondent filed a Statement for Initial Hearing in which he requested that certain property
3 (without indicating whether such property was Respondent's sole property or was marital
4 property), allegedly in Petitioner's possession, be returned to him. The property was itemized in
5 Exhibit C attached to that filing. Respondent also requested distribution and allocation to
6 Petitioner of certain debts allegedly incurred by Petitioner during the marriage without
7 Respondent's approval and consent. Because these issues of distribution of debts and property
8 have not yet been resolved, and Respondent did not address those outstanding issues in his ex
9 parte motion, the Court finds it prudent to deny the request to close the case pending a formal
10 submission from Respondent addressing the remaining issues of property and debts.

11 **THEREFORE, IT IS THE ORDER OF THIS COURT that:**

12 1. The Temporary Custody Order entered June 26, 2017 and all subsequent orders
13 affirming and maintaining that order are hereby VACATED.

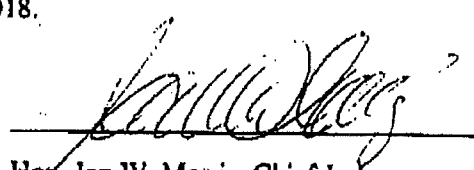
14 2. Legal and physical custody of Jeremiah Blount, d.o.b. 01/19/2010, and Kaydi Blount,
15 d.o.b. 02/19/2013, is restored to Respondent Justin Blount, the minors' biological father.

16 3. The Child Support Order entered June 14, 2016 and all subsequent orders affirming and
17 maintaining that order are hereby VACATED.

18 4. Respondent's child support obligation for the above-named children is terminated.

19 5. Upon the filing of a notice and/or motion from Respondent regarding his prior claims
20 concerning certain property and debts, the Court will consider such notice/motion summarily and
21 issue its ruling promptly.

22 **SO ORDERED** this 23rd day of January, 2018.

23
24 
25 Hon. Jan W. Morris, Chief Judge
26 Hualapai Tribal Court

27 I certify a copy was mailed this 24
day of January, 2018 to:

28 Candace Kane
2364 Wiki Way
Camp Verde, AZ 86322-8566

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Keen Ellsworth, Esq.
777 N. Rainbow Blvd., Ste 270
Las Vegas, NV 89107-1187

by: *Ellsworth*

EXHIBIT B



PET
LAW OFFICES OF F. PETER JAMES, ESQ.
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702-256-0087
702-256-0145 (fax)
Counsel for Petitioner

**DISTRICT COURT, FAMILY DIVISION
CLARK COUNTY, NEVADA**

In the matter of the Visitation of the
Persons of:

CASE NO. : D-18-571209-O
DEPT. NO. : B

Jeremiah Caleb Blount, Kaydi Rose
Blount, Luna Bell Blount, and Logan
Alexander Blount, minors;

**PETITION FOR GRANDPARENT
VISITATION (NRS 125C.050)**

PAULA BLOUNT,

Petitioner,

vs.

JUSTIN CRAIG BLOUNT,

Respondent.

COMES NOW Petitioner Paula Blount, by and through her counsel, F.
Peter James, Esq., who hereby petitions this Honorable Court for visitation rights
as to the minor children Jeremiah Caleb Blount, Kaydi Rose Blount, Luna Bell

1 Blount, and Logan Alexander Blount pursuant to NRS 125C.050. In support of
2 their petition, Petitioner hereby allege and request relief as follows:

- 3 1. The minor children at issue, Jeremiah Caleb Blount, Kaydi Rose Blount,
4 Luna Bell Blount, and Logan Alexander Blount, have been residing in the
5 State of Nevada for several months prior to the filing of this Petition.
- 6 2. The mother of Jeremiah and Kaydi is Gretchen Bernice Whatoname-
7 Blount (however now deceased December 27, 2017), who is the late
8 daughter-in-law of Petitioner.
- 9 3. The children's father is Respondent, Justin Craig Blount (hereinafter
10 "Dad"), who is the son of Petitioner.
- 11 4. As Gretchen is deceased, Dad is the sole remaining parent of Jeremiah
12 and Kaydi.
- 13 5. Jeremiah and Kaydi lived off and on with Petitioner all of their lives.
14 Dad, Mom, Jeremiah, and Kaydi have all lived with Petitioner.
- 15 6. Dad is unreasonably denying / restricting Petitioner's visitation with the
16 children.
- 17 7. It is in the children's best interest for Petitioner to have visitation with
18 them.
- 19 8. There are strong love, affection, and other emotional ties existing
20 between Petitioner and the children.

- 1 9. Petitioner has the capacity and disposition to give love, affection, and
2 guidance to the children, as well as serve as a role model to them.
- 3 10. Petitioner will cooperate in providing the children with food, clothing,
4 and other materials needed during the visitation.
- 5 11. Petitioner will cooperate in providing the children with healthcare or
6 alternative care recognized and permitted under the law of this State in
7 lieu of healthcare.
- 8 12. Petitioner has a strong relationship with the children. The children
9 participated in all holidays and other family gathering with Petitioner.
10 The children (less Logan and Luna) lived with Petitioner off and on all of
11 their lives.
- 12 13. Petitioner is morally fit.
- 13 14. Petitioner has no mental or physical health issues that would affect her
14 caring for the children.
- 15 15. The children (ages 8, 5, 2, and less than a year) are too young to voice
16 their preference; however, Petitioner believes that the children would like
17 to have visitation with her.
- 18 16. Petitioner has always been and will continue to be willing and able to
19 facilitate and encourage a close relationship with the children's parent
20 and other relatives.

1 17. The children have no known medical or other health needs that would be
2 affected by the visitation.

3 18. Petitioner has previously financially supported Dad, Mom, Jeremiah and
4 Kaydi. Petitioner has purchased clothing, food, and other necessities for
5 the children. Dad, Mom, and the children (less Logan and Luna) have
6 lived with Petitioner.

7 19. Additional factors in support of Petitioner's request for visitation will be
8 addressed as the occasion arises.

9 **WHEREFORE**, Petitioner respectfully requests that the Court permit
10 them reasonable visitation with the children.

11 Dated this 17 day of May, 2018

12 


13 LAW OFFICES OF F. PETER JAMES
14 F. Peter James, Esq.
15 Nevada Bar No. 10091
16 3821 W. Charleston Blvd., Suite 250
17 Las Vegas, Nevada 89102
18 702-256-0087
19 Counsel for Petitioner
20

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1. That I am the Petitioner in the above entitled action.
2. That I have read the foregoing **PETITION FOR GRANDPARENT VISITATION** and know the contents thereof.
3. That the same is true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters I believe them to be true.
4. Those factual averments contained in said document are incorporated herein as if set forth in full.
5. I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct to the best of my knowledge, information, and belief.


PAULA BLOUNT, Petitioner

STATE OF ARIZONA)
)
COUNTY OF MOJAVE)

 Elyssa Rae Anderson
Notary Public
Mohave County, Arizona
My Comm. Expires 08-18-18

Subscribed and Sworn to before me by
Paula Blount this 14 day of May, 2018

Elyssa Rae Ruñez aka Elyssa Rae Anderson
NOTARY PUBLIC in and for said County and State

EXHIBIT C



MOT
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Counsel for Petitioner

**DISTRICT COURT, FAMILY DIVISION
CLARK COUNTY, NEVADA**

In the matter of the Visitation of the
Persons of:

CASE NO. : D-18-571209-O
DEPT. NO. : B

Jeremiah Caleb Blount, Kaydi Rose
Blount, Luna Bell Blount, and Logan
Alexander Blount, minors;

**MOTION FOR TEMPORARY
ORDERS**

PAULA BLOUNT,

Petitioner,

vs.

JUSTIN CRAIG BLOUNT,

Respondent.

Hearing Date: 07/17/18
Hearing Time: 9:00 AM
Oral Argument Requested: YES

**NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO
THIS MOTION WITH THE CLERK OF THE COURT AND TO
PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE
WITHIN 10 DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE
TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT
WITHIN 10 DAYS OF YOUR RECEIPT OF THIS MOTION MAY
RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE**

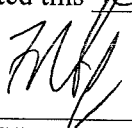
1 **COURT WITHOUT A HEARING PRIOR TO THE SCHEDULED**
2 **HEARING DATE.**

3 COMES NOW Petitioner, Paula Blount by and through her counsel, F.
4 Peter James, Esq., who hereby moves this Honorable Court for the following
5 relief:

- 6 • Temporary visitation with the minor children at issue;
7 • For the Court to set an Evidentiary Hearing regarding this matter, open
8 discovery, and set case management deadlines.

9 This Motion is made and based on the papers and pleadings on file herein,
10 the attached points and authorities, the attached affidavit(s) / declaration(s), the
11 filed exhibit(s), and upon any oral argument the Court will entertain.

12 Dated this 12 day of June, 2018

13 
14 **LAW OFFICES OF F. PETER JAMES**
15 F. Peter James, Esq.
16 Nevada Bar No. 10091
17 3821 W. Charleston Blvd., Suite 250
18 Las Vegas, Nevada 89102
19 702-256-0087
20 Counsel for Petitioner

1 **NOTICE OF MOTION**

2 Please take notice that the present Motion shall be heard on the 17 day
3 of July, 2018 at the hour of 9:00 A.m. in Department B
4 of the Eighth Judicial District Court, Family Division, located at 601 North Pecos
5 Road; Las Vegas, Nevada 89101 in courtroom ~~6~~ 07.

6 Dated this 12 day of June, 2018

7 

8 LAW OFFICES OF F. PETER JAMES

F. Peter James, Esq.

9 Nevada Bar No. 10091

3821 W. Charleston Blvd., Suite 250

10 Las Vegas, Nevada 89102

702-256-0087

11 Counsel for Petitioner

12 **POINTS AND AUTHORITIES**

13 **I.**

14 **BACKGROUND**

15 Petitioner, Paula Blount (hereinafter "Grandmother"), is requesting
16 visitation of her grandchildren: Jeremiah Caleb Blount, Kaydi Rose Blount, Luna
17 Bell Blount, and Logan Alexander Blount (all minors). Petitioner's son is
18 Respondent, Justin Blount (hereinafter "Dad"). The mother of Jeremiah and
19 Kaydi is Gretchen Bernice Whatoname-Blount (deceased as of December 27,
20 2017). The mother of Luna and Logan is Stephanie Blount.

1 The history of the parties and the children is voluminous. It is impossible
2 to tell the whole picture in a narrative. The following narrative is a cursory view
3 into what is happening with this family. The facts in the following section are
4 similarly illustrative.

5 Grandmother was there the days Jeremiah, Kaydi, and Luna were born.
6 Grandmother arrived the day after Logan's birth.

7 Prior to Dad cutting off Grandmother from visitation, Kaydi and Jeremiah
8 had lived with Grandmother for extended periods of time off and on since birth.
9 Grandmother had a great relationship with the children until Dad cut
10 Grandmother off all visitation in early February 2018. Dad also cut off
11 Gretchen's family from contact with the children. Dad gave abuse / neglect as
12 the basis for him cutting off Grandmother and Gretchen's family from the
13 children. Dad has at least one arrest for domestic violence (2013-2014). The
14 outcome of this is unknown at this time, though Dad did have to spend time in a
15 halfway house as a result of his arrest.

16 Grandmother use to be a primary caregiver to Jeremiah and Kaydi.
17 Grandmother was a more maternal figure to the children than a grandmother,
18 given that Dad and Gretchen would leave them (especially Jeremiah and Kaydi)
19 with her for extended periods of time. After Dad was incarcerated for domestic
20

1 violence, Gretched left the children with Grandmother. Grandmother provided
2 structure, fun times, and taught them life lessons.

3 Now and for no reason, Dad has pulled the children away from
4 Grandmother and Gretchen's side of the family. This is a disservice to the
5 children and is not in their best interest.

6 II.

7 DISCUSSION

8 The Court should award Grandmother temporary visitation with the
9 children. The Court should also set this matter for an Evidentiary Hearing, open
10 discovery, and set case management deadlines.

11 A. THE COURT SHOULD AWARD GRANDMOTHER TEMPORARY 12 VISITATION WITH THE CHILDREN

13 The Court should award Grandmother temporary visitation with the
14 children. Courts are permitted to award grandparents visitation with
15 grandchildren. *See* NRS 125C.050. Courts are empowered to enter temporary
16 visitation orders as are in the children's best interest. *See* NRS 125C.0045(1).
17 Grandparents wishing to have court-ordered visitation with their grandchildren
18 must satisfy two threshold issues and then have the burden of proof to establish
19 that it is in the grandchildren's best interest for the grandparents to have
20 visitation. *Id.* First, the Grandparents may show that the children's parents are

1 married but are separated. *See* NRS 125C.050(1). Alternatively, the
2 Grandparents may show that they lived with the children and developed a
3 meaningful relationship with the children. *See* NRS125C.050(2). Then, the
4 Grandparents must show that Dad is unreasonably denying / restricting their
5 visitation with the children. *See* NRS 125C.050(3). Once these threshold
6 requirements are established, then the Grandparents must establish the statute-
7 specific best interest factors, which are as follows:

8 6. In determining whether the party seeking visitation has rebutted the
9 presumption established in subsection 4, the court shall consider:

10 (a) The love, affection and other emotional ties existing between
the party seeking visitation and the child.

11 (b) The capacity and disposition of the party seeking visitation
12 to:

13 (1) Give the child love, affection and guidance and serve
as a role model to the child;

14 (2) Cooperate in providing the child with food, clothing
15 and other material needs during visitation; and

16 (3) Cooperate in providing the child with health care or
17 alternative care recognized and permitted under the
laws of this State in lieu of health care.

18 (c) The prior relationship between the child and the party seeking
19 visitation, including, without limitation, whether the child
20 resided with the party seeking visitation and whether the child
was included in holidays and family gatherings with the party
seeking visitation.

- 1 (d) The moral fitness of the party seeking visitation.
- 2 (e) The mental and physical health of the party seeking visitation.
- 3 (f) The reasonable preference of the child, if the child has a
- 4 preference, and if the child is determined to be of sufficient
- 5 maturity to express a preference.
- 6 (g) The willingness and ability of the party seeking visitation to
- 7 facilitate and encourage a close and continuing relationship
- 8 between the child and the parent or parents of the child as well
- 9 as with other relatives of the child.
- 10 (h) The medical and other needs of the child related to health as
- 11 affected by the visitation.
- 12 (i) The support provided by the party seeking visitation,
- 13 including, without limitation, whether the party has
- 14 contributed to the financial support of the child.
- 15 (j) Any other factor arising solely from the facts and
- 16 circumstances of the particular dispute that specifically
- 17 pertains to the need for granting a right to visitation pursuant
- 18 to subsection 1 or 2 against the wishes of a parent of the child.

19 NRS 125C.050(6).

20 Grandmother meets each threshold issue, and it is in the children's best

interest for them to visit Grandmother.¹

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19 ¹ The facts delineated herein apply to all of the factors. Facts delineated in the factor

20 itself are illustrative, but not necessarily complete. Grandmother does not want to have the

court re-read the same facts over and over.

1 **1. GRANDMOTHER MEETS EACH THRESHOLD ISSUE**

2 Grandmother meets each of the two threshold issues.

3 Parents of the Child are Separated / The Grandparents Lived with the Child and
4 Have a Meaningful Relationship with the Child

5 Jeremiah and Kaydi have lived with Grandmother for several extended
6 periods of time since birth, as well as spending a great deal of time with
7 Grandmother outside of living with her. At one point, they lived with
8 Grandmother for over a year straight. Grandmother had always supported Dad
9 and the children, whether financially or emotionally. Grandmother has a strong
10 relationship with the children.

11 Grandmother had been with Kaydi and Jeremiah for every holiday,
12 birthday, and family event, save for Kaydi's fifth birthday and those that have
13 occurred since Dad cut off Grandmother (and Gretchen's family) from contact
14 with the children. Grandmother and the children have a close bond formed from
15 spending copious amounts of quality time together.

16 Gretchen (Jeremiah's and Kaydi's mother) passed away last December.

17 Grandmother is being Unreasonably Denied Visitation

18 Dad is unreasonably denying Grandmother visitation with the children.
19 Grandmother was a major figure in the children's lives. There is no cause for
20

1 Dad to deny her any visitation, let alone shut her out and to shut out all of
2 Gretchen's family.

3 **2. GRANDMOTHER SATISFIES THE BEST INTEREST FACTORS**

4 Grandmother satisfies the statute-specific best interest factors, which are
5 as follows:²

6 **(a) The love, affection and other emotional ties existing between the**
7 **party seeking visitation and the child.**

8 As stated, Grandmother was a central part of the children's lives. The
9 children (especially Jeremiah and Kaydi), have exceptionally strong emotional
10 ties to Grandmother. Grandmother was a central caregiver to Jeremiah and Kaydi
11 and a loving grandmother to Luna and Logan.

12 When Gretchen passed away, Jeremiah asked Grandmother if he were ever
13 going to see her again. He asked this to Grandmother again a month later in
14 January 2018 and again in early February 2018, which is the last time
15 Grandmother saw the children. On that day, Kaydi said she did not want to stay
16 with Dad, but that she wanted Grandmother to take her.

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20 ² The facts stated herein also apply to the factors.

1 **(b) The capacity and disposition of the party seeking visitation to:**

2 **(1) Give the child love, affection and guidance and serve as a**
3 **role model to the child**

4 **(2) Cooperate in providing the child with food, clothing and**
5 **other material needs during visitation**

6 **(3) Cooperate in providing the child with health care or**
7 **alternative care recognized and permitted under the laws**
8 **of this State in lieu of health care.**

9 Grandmother gives the children plentiful emotional support. Logan was
10 too small for much verbal affection, but was given generous physical affection
11 by Grandmother. A saying Jeremiah and Kaydi have with Grandmother is that
12 she loves them to heaven and back. The children used to say to the moon and
13 back, but Grandmother said that to heaven and back was better as it was further
14 away.

15 Grandmother has structure with the children, specifically as to Jeremiah
16 and Kaydi. They have rules to follow, bedtimes, and expectations of behavior.
17 Grandmother cooks for the children and rarely gives them candy or soda.
18 Grandmother values education and has provided the children with school
19 supplies and money for other school-related matters. Grandmother paid for the
20 children's after-school care.

1 Grandmother did bible study with the children nightly, as well as prayers.
2 She does not permit the children to watch inappropriate television or internet
3 matters. Grandmother does not permit violent video games. Grandmother does
4 not permit drinking, drugs, or foul language in her home. Grandmother has extra
5 bedrooms for the children.

6 Grandmother has taken Jeremiah and Kaydi to the doctor when needed.
7 Grandmother will abide by Dad's wishes as to the medical care of the children.

8 Dad had blocked much of Grandmother's time with Luna. Grandmother
9 was involved with Luna early on, but then Dad stopped allowing her to see Luna.³

10 **(c) The prior relationship between the child and the party seeking**
11 **visitation, including, without limitation, whether the child**
12 **resided with the party seeking visitation and whether the child**
13 **was included in holidays and family gatherings with the party**
14 **seeking visitation.**

15 Grandmother was with the Jeremiah and Kaydi for every holiday and
16 family gathering, save for two events, to wit: Kaydi's fifth birthday and Easter
17 2018 (Dad had cut off visitation by then). The children (especially Jeremiah and
18

19 ³ Gretchen had custody of Kaydi and Jeremiah. Dad had his subsequent children (Luna
20 and Logan) with Stephanie. It was with Gretchen that Grandmother received the bulk of her
visitation with the children.

1 Kaydi as they are older) have a tremendous bond with Grandmother. They lived
2 with Grandmother for a substantial portion of their lives.

3 On Easter, Grandmother made Jeremiah's and Kaydi's Easter baskets.
4 Most of the time (all save two), Grandmother arranged the egg-dying with them.

5 For Christmases, Grandmother and the children's great-grandmother
6 (Grandmother's mother) played Santa Claus for the children. They brought Santa
7 presents and did the children's stockings. For all of the Christmases save 2012,
8 the children spent the night with Grandmother from Christmas Eve to Christmas
9 Day. For 2012, the children came over on Christmas Day.

10 After Grandmother had bonded with Luna, Dad stopped permitting visits
11 with Luna. Dad then told Grandmother that she could see Luna again.
12 Grandmother, though she dearly wanted visitation with Luna, was hesitant.
13 Grandmother did not want Luna to bond with her—only to be taken away again.
14 To spare Luna the emotional upheaval, Grandmother wanted to be in Luna's life
15 or not. Dad permitted Grandmother to visit with Luna, only to take her away
16 again. Grandmother had opened up a bank account for Luna and puts her
17 Christmas and birthday money in there for her.

18 **(d) The moral fitness of the party seeking visitation.**

19 Grandmother is an upstanding citizen and a good role model.
20 Grandmother is a religious person who studies the bible and prays nightly. With

1 Dad's permission, she has instilled these values upon the children.

2 **(e) The mental and physical health of the party seeking visitation.**

3 Grandmother has no mental or physical issues which would prevent her
4 from exercising extended visitation with the children. Grandmother is looking
5 forward to having the children with her. Grandmother is a young 57 years old.

6 **(f) The reasonable preference of the child, if the child has a**
7 **preference, and if the child is determined to be of sufficient**
8 **maturity to express a preference.**

9 The children are too young to form a preference. If Jeremiah and Kaydi
10 were asked, they would say they want to spend time with Grandmother. The
11 others are too young even for that.

12 **(g) The willingness and ability of the party seeking visitation to**
13 **facilitate and encourage a close and continuing relationship**
14 **between the child and the parent or parents of the child as well**
15 **as with other relatives of the child.**

16 Grandmother respects the parental relationship. Grandmother just wants
17 to visit with her grandchildren. Grandmother has never spoken ill of the
18 children's parents in front of them. Any differences she has with Dad is none of
19 the children's concern.

20

1 Grandmother took a central role in cleaning up Dad's house. If she and
2 other relatives did not, his house would have been filthy. When he moved into
3 his first duplex, Grandmother bought their kitchen items—towels, wash rags,
4 dishes, pots and pans, silverware, and the like. Grandmother arranged for the
5 church to donate furniture, a queen-size bed, a futon, and a dining room set.
6 Grandmother paid for part of Jeremiah's crib. When they lived with
7 Grandmother, Jeremiah's crib was in her room.

8 **(h) The medical and other needs of the child related to health as**
9 **affected by the visitation.**

10 The children have no known medical needs that would be affected by
11 visitation with Grandmother or which would impact her visitation with them.
12 Jeremiah and Kaydi have historically done well in school. They have been well-
13 grounded children. Grandmother is informed that there are some behavior issues
14 with Jeremiah after the death of his mother, followed by a sudden cessation of
15 visitation with Grandmother.

16 Jeremiah expects promises to be kept. In front of Jeremiah, Dad told me
17 that Grandmother that she would have weekly phone calls with the children and
18 monthly visitation. This has not happened, though Grandmother has tried.
19 Jeremiah is likely upset by this as he expects promises to be kept.

20 ///

1 **(i) The support provided by the party seeking visitation, including,**
2 **without limitation, whether the party has contributed to the**
3 **financial support of the child.**

4 As stated, the children have lived with Grandmother (save Luna and
5 Logan). Dad lived with Grandmother as an adult with children. Grandmother
6 has provided copious financial support to the children, and to Dad.

7 At her house, Grandmother provided the children's toys, bicycles, food,
8 and other needs. Jeremiah has an Avengers bed, while Kaydi has a Princess bed.
9 Grandmother paid for most of their school uniforms and made lunch for them or
10 bought them school lunch. Grandmother made sure the children had a full closet
11 full of clothes.

12 **(j) Any other factor arising solely from the facts and circumstances**
13 **of the particular dispute that specifically pertains to the need for**
14 **granting a right to visitation pursuant to subsection 1 or 2**
15 **against the wishes of a parent of the child.**

16 Grandmother has been there for the children when even Dad could not care
17 for them. When Dad was arrested in 2013 / 2014 for domestic violence in
18 Arizona, Grandmother made arrangements for the children to see him in the
19 halfway house. Grandmother paid for the hotel rooms and made arrangements
20 with local churches so that the children could visit Dad.

1 When Dad wanted to divorce Gretchen, Grandmother fronted Dad the
2 money after he asked. When Dad and Stephanie wanted to move to Las Vegas,
3 Grandmother loaned them money to do so.

4 * * *

5 Based on the foregoing, the Court should award Grandmother temporary
6 visitation with the children as well as a final order of visitation.

7 **B. THE COURT SHOULD SET AN EVIDENTIARY HEARING IN**
8 **THIS MATTER, OPEN DISCOVERY, AND SET CASE**
9 **MANAGEMENT DEADLINES**

10 Grandmother is requesting that the Court set the matter for an Evidentiary
11 Hearing and open discovery. In a grandparent's visitation matter, the Court must
12 hold an evidentiary hearing to evaluate the best interest factors. *See Wallace v.*
13 *Wallace*, 112 Nev. 1015, 1023, 992 P.2d 541, 545-46 (1996). The Court should
14 also open and set discovery deadlines. *Cf. NRCP 16.2 and NRCP 16.205.* The
15 Court should also set case management deadlines. *Cf. NRCP 16.2(d) and NRCP*
16 *16.205(d).*

17 As such, the Court should set an Evidentiary Hearing, open discovery, and
18 set case management deadlines.

19 ///

20 ///

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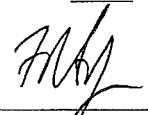
III.

CONCLUSION

Based on the foregoing, the Court should enter the following orders:

- Awarding Grandmother temporary visitation with the minor children at issue;
- Setting an Evidentiary Hearing regarding this matter, opening discovery, and setting case management deadlines.

Dated this 12 day of June, 2018



LAW OFFICES OF F. PETER JAMES
F. Peter James, Esq.
Nevada Bar No. 10091
3821 W. Charleston Blvd., Suite 250
Las Vegas, Nevada 89102
702-256-0087
Counsel for Petitioner

1

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EXHIBIT D

From: *

07/30/2018 10:08

#684 P.002/006

Electronically Filed
8/16/2018 11:24 AM
Steven D. Grierson
CLERK OF THE COURT



ORDR

JOHN T. KELLEHER, ESQ.

Nevada State Bar No. 6012

SAIRA HASEEBULLAH, ESQ.

Nevada State Bar No. 13500

KELLEHER & KELLEHER, LLC

40 S. Stephanie Street, Suite #201

Henderson, Nevada 89012

Telephone: (702) 384-7494

Facsimile: (702) 384-7545

kelleherjt@aol.com

Attorney for Respondent

DISTRICT COURT

CLARK COUNTY, NEVADA

In the Matter of the Visitation of the Persons of:) Case No: D-18-571209-O

JEREMIAH CALEB BLOUNT)

KAYDI ROSE BLOUNT) Dept: B

LUNA BELL BLOUNT)

LOGAN ALEXANDER BLOUNT, minors:)

PAULA BLOUNT,)
Petitioner)

)

)

vs.)

)

JUSTIN CRAIG BLOUNT,)

Respondent/CounterPetitioner)

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND
ORDER FROM JULY 25, 2018 HEARING

THIS MATTER having come on for hearing on the 25th day of July, 2018, on a continued Hearing from 07/17/18; Petitioner, Paula Blount, present and represented by F. Peter James, Esq. of the Law Offices of F. Peter James, Esq.; Respondent, Justin Craig Blount, not present but represented by John T. Kelleher, Esq., and Saira Haseebullah, Esq., of the law firm Kelleher & Kelleher LLC; the Court having reviewed the papers and pleadings on file herein, having been fully apprised as to the facts and matters herein; wherefore:

THE COURT HEREBY NOTED that the natural mother of the younger two children is alive, and the oldest children have a different mother than the two younger children. (See Hearing Video

RECEIVED

AUG 14 2018

DEPT. B

Case Number: D-18-571209-O

LAW OFFICES
KELLEHER & KELLEHER LLC
40 S. STEPHANIE STREET, SUITE #201
HENDERSON, NEVADA 89012
(702) 384-7494

LAW OFFICES
KELLEHER & KELLEHER LLC
40 S. STEPHANIE STREET, SUITE #201
HENDERSON, NEVADA 89012
(702) 364-7494

1 dated July 25, 2018, Time Stamped at 10:54:14) Natural mother was not named as a party or served
2 in this action. (See *Id* at 10:54:18). Petitioner has alleged nothing that would allow visitation with Luna
3 or Logan. (See *Id* at 10:54:35)

4 THE COURT HEREBY FINDS that the Hualapai Tribe has exercised jurisdiction over the two older
5 children in two separate proceedings. As such, the Hualapai Tribe has continuing, exclusive
6 jurisdiction over the children. (See *Id* at 10:54.)

7 THE COURT HEREBY FINDS that Nevada does not have jurisdiction in this matter. (See *Id*
8 at 10:55.) The two oldest children were not present in Las Vegas or Clark County for the six
9 consecutive months prior to the onset of this action, including any temporary absence, immediately
10 before the commencement proceedings. (See *Id* at 10:55:08)

11 THE COURT FURTHER FINDS that the children may have been in Las Vegas for six months
12 as of the current hearing date but that is not the requirement or statute or in the case file that follows.
13 (See *Id* at 10:55:21.)

14 THE COURT FURTHER FINDS that the argument that visitation is not custody and custodial
15 visitation is separate and different from any third party visitation is inaccurate. (See *Id* at 10:55:38)
16 Visitation is as the Nevada Supreme Court and *Friedman v. Eighth Judicial Dist. Court of State*, ex
17 rel. Cty. of Clark, 127 Nev. 842, 849, 264 P.3d 1161, 1166 (2011), discussed and find that a
18 proceeding in which legal custody, physical custody or visitation with respect to a child is at issue. (See
19 *Id* at 10:55:46 - 10:55:52.)

20 THE COURT FURTHER FINDS that the Court does not view non-custodial visitation or
21 visitation with a third party through separate lenses. Any visitation rights given to a non-parent affects
22 a parents' visitation and custody rights. (See *Id* at 10:56:00 - 10:56:14.)

23 THE COURT FURTHER FINDS that accordingly, it is more appropriate for the Tribe and
24 Judge who has heard two separate matters relative to these children to continue to hear these issues.
25 In addition, that forum is more convenient. (See *Id* at 10:56:15 - 10:56:35.) The children are older and
26 have only been in Nevada for a handful of months. (See *Id* at 10:56:48). All of the paperwork and

LAW OFFICES
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 40 S. STEPHANIE STREET, SUITE #201
 HENDERSON, NEVADA 89012
 (702) 344-7474

1 witnesses that would be relevant for an evidentiary hearing as to visitation reside or are in the control
 2 of the tribe and the surrounding area. (See *Id* at 10:56:50 - 10:57:09).

3 IT IS HEREBY ORDERED that Respondent's Request is GRANTED, denying Petitioner
 4 visitation with all four minor children and dismissing the action. (See *Id* at 10:57:18).

5 IT IS FURTHER ORDERED that Attorney's Fees shall be awarded to Respondent. Attorney
 6 Kelleher shall submit a Memorandum of Fees and Costs, and a *Brunzell-Miller* Affidavit and a
 7 proposed order within 10 days from today and served upon opposing counsel. Proposed order shall
 8 include Findings of Facts and Conclusions of Law. Opposing counsel shall have 10 days to file a
 9 Response. Matter will be set on Chamber's Calendar, and no appearances are required.

10 IT IS FURTHER ORDERED that Attorney Kelleher shall prepare the Order form today's
 11 hearing, with Attorney James to review and countersign.

12 IT IS SO ORDERED this 15th August day of July 2018.
 13
 14
 15


 DISTRICT COURT JUDGE
 LINDA MARQUIS

18 Submitted by:

19 KELLEHER & KELLEHER, LLC

20
 21 
 22 JOHN T. KELLEHER, ESQ.

23 Nevada Bar No. 6012
 24 40 S. Stephanie Street, Suite #201
 25 Henderson, Nevada 89012
 26 Attorney for Respondent
 27
 28

Approved as to form and content:

LAW OFFICES OF F. PETER JAMES, ESQ.

29
 30 
 31 F. PETER JAMES ESQ.

32 Nevada Bar No. 10091
 33 3821 W. Charleston Blvd, Suite 250
 34 Las Vegas, NV 89012
 35 Attorney for Petitioner

EXHIBIT E

DESERT PARKWAY BEHAVIORAL HEALTHCARE HOSPITAL
PSYCHIATRIC EVALUATION

Page 1 of 3

DATE OF EVALUATION: August 21, 2018

HISTORY OF PRESENT ILLNESS: The patient is an 8-year-old male

FAMILY HISTORY OF PSYCHIATRIC ILLNESS: Biological mother and grandparents have a history of substance abuse.

SUBSTANCE ABUSE HISTORY: None reported.

SOCIAL HISTORY: He lives at home with his stepmother, father, and siblings. Patient reports being home schooled due to his behavior at school and not getting along with peers. History of being abused by biological mother and grandparents, sexual abuse by grandmother reported in the past.

PATIENT NAME: Blount, Jeremiah
DATE OF BIRTH: JANUARY 19, 2010
MEDICAL RECORD #: 108447
ADMISSION #: 1806218
ADMISSION DATE: AUGUST 21, 2018
ATTENDING PHYSICIAN: Deepa Hasija, MD

DESERT PARKWAY BEHAVIORAL HEALTHCARE HOSPITAL
PSYCHIATRIC EVALUATION
Page 2 of 3

CURRENT MEDICAL PROBLEMS: Asthma.

ALLERGIES: NO KNOWN DRUG ALLERGIES REPORTED.

CURRENT MEDICATIONS: None.

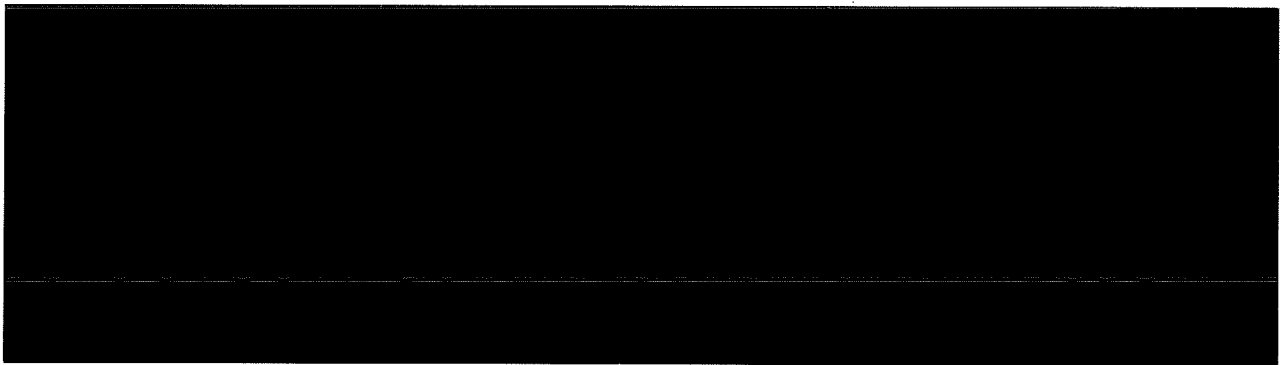
PREVIOUS MEDICATION TRIALS: Unknown.

REVIEW OF SYSTEMS: Negative for any acute problems.

MENTAL STATUS EXAMINATION: Appearance/behavior: The patient is an 8-year-old male,



ASSETS AND STRENGTHS: Supportive family and friends, stable living situation.



PATIENT NAME:	Blount, Jeremiah
DATE OF BIRTH:	JANUARY 19, 2010
MEDICAL RECORD #:	108447
ADMISSION #:	1806218
ADMISSION DATE:	AUGUST 21, 2018
ATTENDING PHYSICIAN:	Deepa Hasija, MD

DESERT PARKWAY BEHAVIORAL HEALTHCARE HOSPITAL
PSYCHIATRIC EVALUATION

Page 3 of 3

PRELIMINARY DISCHARGE PLAN: Home.

INITIAL DIAGNOSES:

MENTAL HEALTH AND PHYSICAL DISORDERS: Disruptive mood dysregulation disorder.

SECONDARY: None.

MEDICAL: None.

PSYCHOSOCIAL STRESSORS: Social environment, primary support system, school.

COORDINATION OF CARE: Baseline labs ordered. Medical doctor to follow up for history and physical.

Deepa Hasija, MD

DH/ANO

177264240 / 23365644

D: 08/21/2018 16:14

T: 08/21/2018 17:53

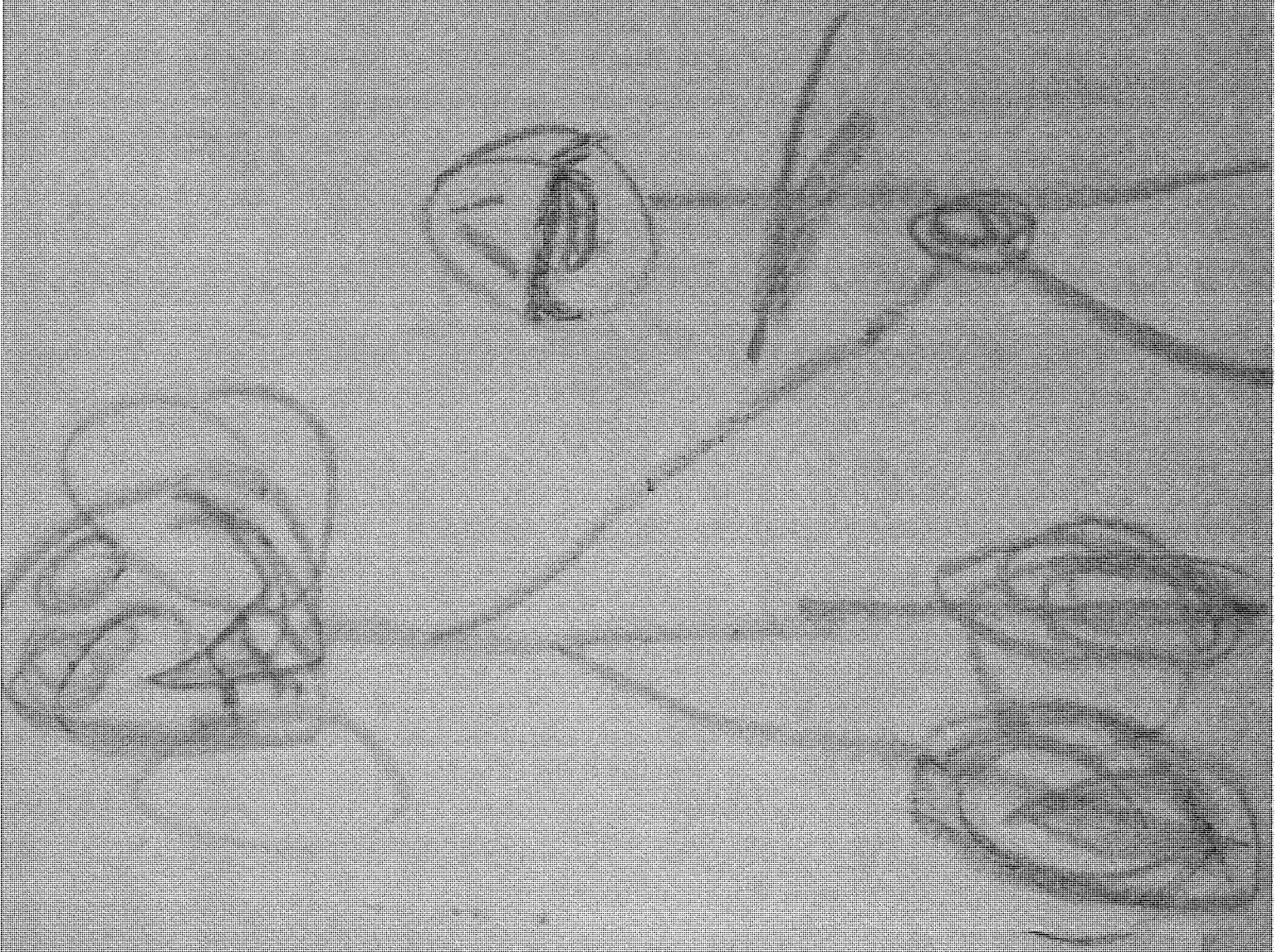
PATIENT NAME:	Blount, Jeremiah
DATE OF BIRTH:	JANUARY 19, 2010
MEDICAL RECORD #:	108447
ADMISSION #:	1806218
ADMISSION DATE:	AUGUST 21, 2018
ATTENDING PHYSICIAN:	Deepa Hasija, MD

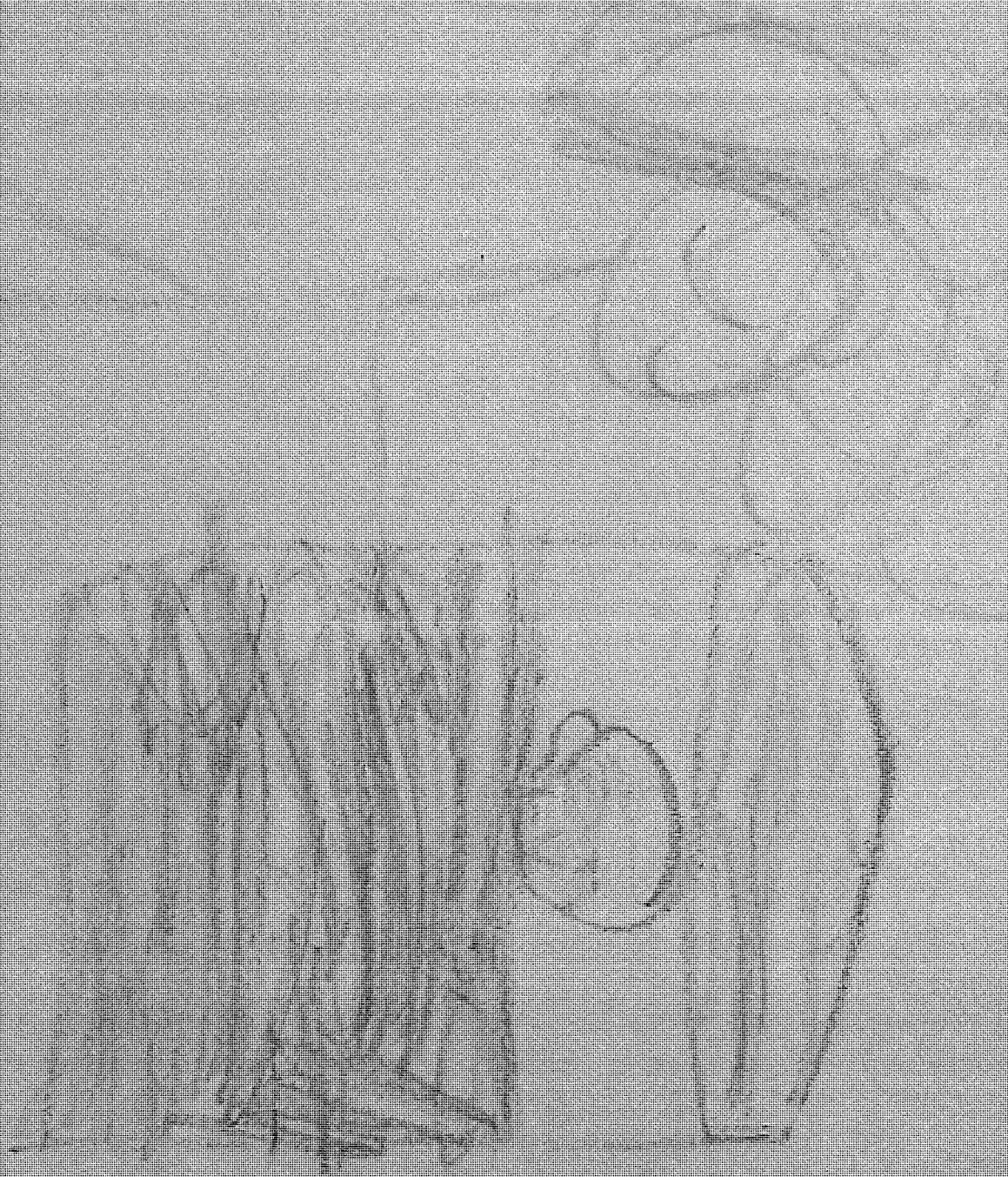
Auntie Lily

touching

private

parts.





Grandpa - Mom's
died
with
Welford Touchins
private part

Per pt.

Auntie Lily & ~~Grandmother~~

Scrubbing

private part "vagina"

until

to hard

bleeding

with

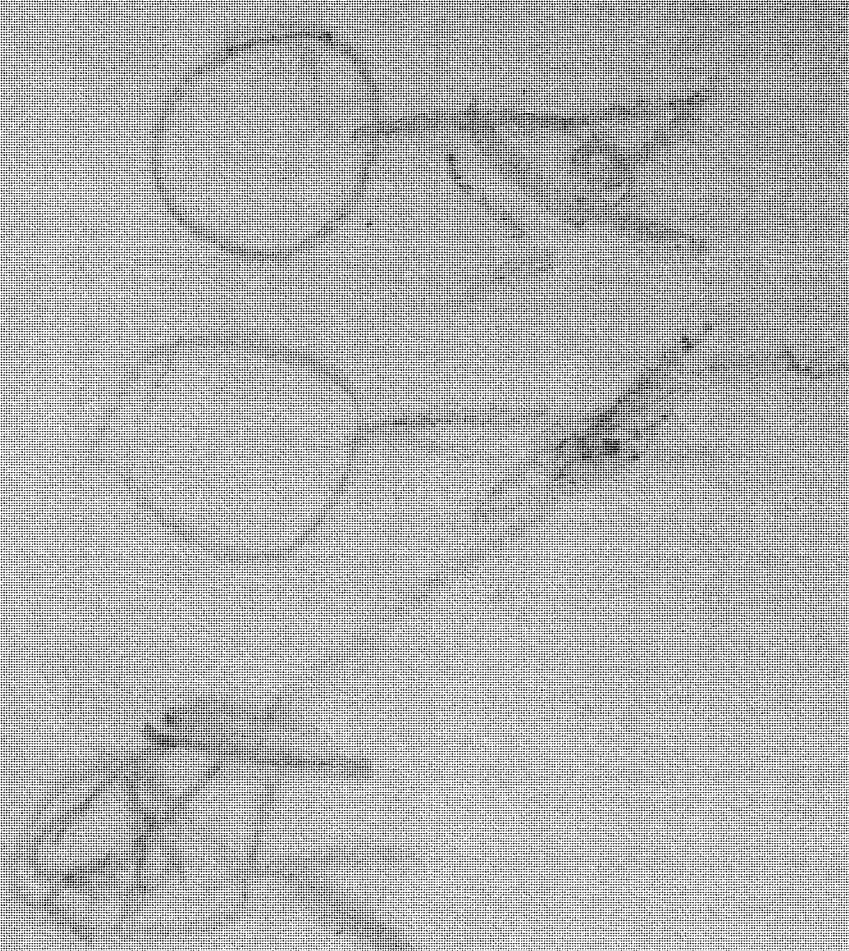
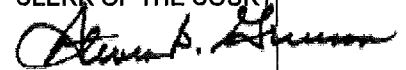


EXHIBIT F



Electronically Filed
Aug 30 2018 11:51 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

NOAS
LAW OFFICES OF F. PETER JAMES, ESQ.
F. Peter James, Esq.
Nevada Bar No. 10091
Peter@PeterJamesLaw.com
3821 West Charleston Boulevard, Suite 250
Las Vegas, Nevada 89102
702-256-0087
702-256-0145 (fax)
Counsel for Petitioner

DISTRICT COURT, FAMILY DIVISION
CLARK COUNTY, NEVADA

In the matter of the Visitation of the
Persons of:

CASE NO. : D-18-571209-O
DEPT. NO. : B

Jeremiah Caleb Blount, Kaydi Rose
Blount, Lune Bell Blount, and Logan
Alexander Blount, minors;

NOTICE OF APPEAL

PAULA BLOUNT,

Petitioner,

vs.

JUSTIN CRAIG BLOUNT,

Respondent.

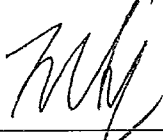
Notice is hereby given that Petitioner, Paula Blount, hereby appeals to the
Supreme Court of Nevada from the Orders entered on August 14, 2018 and

///

///

1 August 23, 2018.

2 Dated this 24 day of August, 2018

3 

4

LAW OFFICES OF F. PETER JAMES

5 F. Peter James, Esq.

6 Nevada Bar No. 10091

7 3821 W. Charleston Blvd., Suite 250

8 Las Vegas, Nevada 89102

9 702-256-0087

10 Counsel for Petitioner

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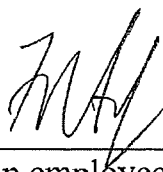
1 **CERTIFICATE OF SERVICE**

2 I certify that on this 24 day of August, 2018, I caused the above and
3 foregoing document entitled **NOTICE OF APPEAL** to be served as follows:

4 ☒ pursuant to EDCR 8.05(A), EDCR 8.05(F), NRCp 5(b)(2)(D)
5 and Administrative Order 14-2 captioned "In the Administrative
6 Matter of Mandatory Electronic Service in the Eighth Judicial
7 District Court," by mandatory electronic service through the
8 Eighth Judicial District Court's electronic filing system;
9 to the attorney(s) / party(ies) listed below at the address(es), email address(es),
10 and/or facsimile number(s) indicated below:

11 John T. Kelleher, Esq.
12 40 S. Stephanie Street., Suite 201
Henderson, Nevada 89012
702-384-7494
13 Counsel for Respondent

14
15 By:



16 An employee of the Law Offices of F. Peter James, Esq., PLLC
17
18
19
20

EXHIBIT G

CONFIDENTIAL

NOTICE OF CHILD CUSTODY PROCEEDING FOR INDIAN CHILD

Attorney or Party without Attorney

Name: Jason and Stephanie Blount
 Address: 100 N Wallace Dr Apt 156 Las Vegas, NV 89107
 Telephone Number: 928-225-7904
 E-mail Address (Optional): _____
 Attorney For (If applicable): _____
 State Bar No. (If applicable): _____
Eighth Judicial District Court
 COURT OF Nevada COUNTY OF: Clark
 Address: 601 N. Pecos Las Vegas, NV 89106
 Branch Name: _____
 Telephone No.: 702-455-1500

Court Use Only

01/07/19

CASE NAME: Step parent Adoption

CASE NO.: D-1958479A

THIS IS A NOTICE OF CHILD CUSTODY PROCEEDING FOR INDIAN CHILD

TO (Check all that apply)

☐ Parents or legal guardians ☐ Indian custodians ☒ Tribes* ☐ BIA Regional Director
 THAT based on the petition, a copy of which is attached to this notice, a child-custody proceeding under the Indian Child Welfare Act (25 U.S.C. §§ 1901 et seq) has been initiated for the following child: (a separate notice must be filed for each child)

Name: Kaydi Blount
 Date of Birth: 2/14/2013 Place of Birth: Phoenix, AZ

FOR the following proceeding: (Check all that apply)

☐ Juvenile ☐ Dependency ☐ Delinquency ☐ Declaration of Freedom from Control of Parent
☒ Adoption ☐ Custody ☐ Guardianship ☐ Termination of Parental Rights
☐ Voluntary relinquishment of child by parent

WITH potential consequences of this proceeding are: (Describe here) orders for step parent adoption without termination of parental rights

A HEARING WILL BE HELD on:

Date: 1-17-19 Time: 8:45 AM Location: 601 N Pecos Las Vegas, NV Room: Department B
 Type of Hearing: Step parent Adoption
 Address and telephone number of court: 601 N Pecos Las Vegas, NV 89106
702-455-1500

TRIBES

The child is or may be a member (or the child of a member) of the following Indian Tribes: (List each)

Hualapai - enrollment number 2995

*Notice to the Tribe must be sent to the Tribe's chairman or designated agent for service of ICWA notices.

CASE NAME:

CASE NO.:

Under the Indian Child Welfare Act:

- The parent or Indian custodian has the right to intervene in the proceedings.
- The child's Indian tribe has the right to intervene at any time in a State court proceeding for the foster care placement of or termination of a parental right.
- If the Indian parent(s) or, if applicable, Indian custodian(s) is unable to afford counsel based on a determination of indigency by the court, counsel will be appointed to represent the parent or Indian custodian where authorized by State law.
- The parent, Indian custodian, and Tribe have the right to be granted, upon request, a specific amount of additional time (up to 20 additional days) to prepare for the proceedings due to circumstances of the particular case.
- The parent, Indian custodian, and Tribe have the right to petition the court for transfer of the proceeding to tribal court under 25 U.S.C. 1911, absent objection by either parent: Provided, that such transfer is subject to declination by the tribal court.

INFORMATION ON THE CHILD

a. The child's birth certificate is: ☒ attached ☐ unavailableb. A copy of the Tribal registration card of ☐ the child ☐ the parent is attached ☐ unavailable

c. Biological relative information is listed below.

(Indicate if any information is unknown or does not apply. Do not use the abbreviation "N/A")

Biological Mother	Biological Father
Name (include maiden, married, and former names or aliases): <u>Gretchen Whatorame</u> <u>Gretchen Blount</u>	Name (include maiden, married, and former names or aliases): <u>Justin Blount</u>
Current address: <u>Deceased</u>	Current address: <u>10011 Wallace Dr Apt 156</u> <u>Las Vegas, NV 89107</u>
Former address: <u>30 Music Mountain Circle</u> <u>Peach Springs, AZ</u>	Former address:
Birth date and place: <u>7-7-83</u> <u>AZ</u>	Birth date and place: <u>7-23-85</u> <u>Fountain Valley CA</u>
Tribe and location: <u>Hualapai Tribe</u> <u>Peach Springs, AZ</u>	Tribe and location:
Tribal membership or enrollment number, if known: <u>previous member yes # unknown</u>	Tribal membership or enrollment number, if known:
If deceased, date and place of death: <u>12-29-17</u> <u>Las Vegas, NV</u>	If deceased, date and place of death: <u>living</u>
Additional information:	Additional information:

CASE NAME:

CASE NO.:

INFORMATION ON THE CHILD (CONTINUED)

Mother's Biological Mother (Child's Maternal Grandmother)	Father's Biological Mother (Child's Paternal Grandmother)
Name (include maiden, married, and former names or aliases): Giretna Whatorame	Name (include maiden, married, and former names or aliases): Paula Blount
Current address: Peach Springs, AZ	Current address: Kingman, AZ
Former address:	Former address:
Birth date and place:	Birth date and place:
Tribe and location:	Tribe and location: non-native
Tribal membership or enrollment number, if known:	Tribal membership or enrollment number, if known:
If deceased, date and place of death:	If deceased, date and place of death:
Mother's Biological Father (Child's Maternal Grandfather)	Father's Biological Father (Child's Paternal Grandfather)
Name (include maiden, married, and former names or aliases): Wilfred J. Whatorame	Name (include maiden, married, and former names or aliases): Richard Blount
Current address: Peach Springs, AZ	Current address: Deceased
Former address:	Former address:
Birth date and place:	Birth date and place:
Tribe and location: Hualapai Tribe	Tribe and location: non-native
Tribal membership or enrollment number, if known: # unknown	Tribal membership or enrollment number, if known:
If deceased, date and place of death:	If deceased, date and place of death: 1-19-16 Las Vegas, NV

CASE NAME:

CASE NO.:

INFORMATION ON THE CHILD (CONTINUED)

Mother's Biological Grandmother (Child's Maternal Great-grandmother)	Mother's Biological Grandmother (Child's Maternal Great-grandmother)
Name (include maiden, married, and former names or aliases): <i>Katie</i>	Name (include maiden, married, and former names or aliases): <i>unknown</i>
Current address: <i>Deceased</i>	Current address:
Former address:	Former address:
Birth date and place:	Birth date and place:
Tribe and location: <i>Hualapai Tribe Peach Springs, AZ</i>	Tribe and location:
Tribal membership or enrollment number, if known: <i>unknown #</i>	Tribal membership or enrollment number, if known:
If deceased, date and place of death:	If deceased, date and place of death:
Mother's Biological Grandfather (Child's Maternal Great-grandfather)	Mother's Biological Grandfather (Child's Maternal Great-grandfather)
Name (include maiden, married, and former names or aliases): <i>Wilfred Whate name</i>	Name (include maiden, married, and former names or aliases): <i>unknown</i>
Current address: <i>Peach Springs, AZ</i>	Current address:
Former address:	Former address:
Birth date and place:	Birth date and place:
Tribe and location: <i>Hualapai tribe Peach Springs, AZ</i>	Tribe and location:
Tribal membership or enrollment number, if known: <i>unknown #</i>	Tribal membership or enrollment number, if known:
If deceased, date and place of death:	If deceased, date and place of death:

CASE NAME:

CASE NO.:

INFORMATION ON THE CHILD (CONTINUED)

Father's Biological Grandmother (Child's Paternal Great-grandmother)	Father's Biological Grandmother (Child's Paternal Great-grandmother)
Name (include maiden, married, and former names or aliases): <i>MARY shephard</i>	Name (include maiden, married, and former names or aliases): <i>unknown</i>
Current address: <i>Kingman, AZ</i>	Current address:
Former address: <i>CA</i>	Former address:
Birth date and place:	Birth date and place:
Tribe and location: <i>non-native</i>	Tribe and location:
Tribal membership or enrollment number, if known:	Tribal membership or enrollment number, if known:
If deceased, date and place of death:	If deceased, date and place of death:
Father's Biological Grandfather (Child's Paternal Great-grandfather)	Father's Biological Grandfather (Child's Paternal Great-grandfather)
Name (include maiden, married, and former names or aliases): <i>Bruce</i>	Name (include maiden, married, and former names or aliases): <i>unknown</i>
Current address:	Current address:
Former address:	Former address:
Birth date and place:	Birth date and place:
Tribe and location:	Tribe and location:
Tribal membership or enrollment number, if known:	Tribal membership or enrollment number, if known:
If deceased, date and place of death:	If deceased, date and place of death:

CASE NAME:

CASE NO.:

INFORMATION ON THE CHILD (CONTINUED)

Indian Custodian Information	Indian Custodian Information
Name (include maiden, married, and former names or aliases): <i>None</i>	Name (include maiden, married, and former names or aliases): <i>None</i>
Current address:	Current address:
Former address:	Former address:
Birth date and place:	Birth date and place:
Tribe and location:	Tribe and location:
Tribal membership or enrollment number, if known:	Tribal membership or enrollment number, if known:
If deceased, date and place of death:	If deceased, date and place of death:

INFORMATION ON THE CHILD (CONTINUED)

(Answer "yes", "no", or "unknown")

- a. Biological father is named on birth certificate yes
- b. Biological father has acknowledged parentage yes
- c. There has been a judicial declaration of parentage _____
- d. There are other alleged fathers no (If yes, name here: _____)

PARTIES NOTIFIED

Relationship to Child	Name	Address	Telephone Number
<i>Hualapai tribe chairman</i>	<i>Dr. Damon R. Clarke</i>	<i>PO Box 179 Peach Springs, AZ 86434</i>	<i>928-769-2216</i>

CASE NAME:

CASE NO.:

The following optional questions may also be helpful:

Has the child or any of the child's biological family members ever:

a. Attended an Indian school? Yes

If so, provide details here: _____

b. Received medical treatment at an Indian health clinic or Health Service hospital? _____

If so, provide details here: _____

c. Lived on federal trust land, on an Indian reservation, or in an Alaska Native village? Yes

Other relative information (e.g., aunts, uncles, first and second cousins, stepparents)

Name/relationship to child	Current and former address	Birth date and place	Tribe and location
Stephanie Blount Stepmother	100 N Wallace Dr Apt 156 Las Vegas, NV 89107	Texas	unknown
Lilly Whatoname Aunt	Peach Springs, AZ	AZ	Hualapai Peach Springs
Mike Blount uncle	Kingman, AZ		none
Wife Julius Alven Whatoname	Peach Springs, AZ	AZ	Hualapai Peach Springs
Aunt Sheila R Whatoname	Peach Springs, AZ	AZ	Hualapai Peach Springs

DECLARATION OF ACCURACY (to be completed by petitioner)

I am the petitioner. I have given all the information I have about the relatives and, if applicable, the Indian custodian, of the child who is the subject of the child-custody proceeding named on this form. I declare under penalty of perjury that the foregoing and all attachments are true and correct.

Name (printed) Justin BlountSignature [Signature] Date 12-31-18Name (printed) Stephanie BlountSignature [Signature] Date 12-31-18**DECLARATION OF MAILING (to be completed by social worker) stepparent/parent**

I certify that a copy of this notice with a copy of the petition identified on page 1 of this notice was mailed as follows. Each copy was enclosed in an envelope with postage for registered or certified mail, return receipt requested, fully prepaid. The envelopes were addressed to each person, Tribe, or agency as indicated above. Each envelope was sealed and deposited with the U.S. Postal Service at [location] 201 S Las Vegas Blvd. Suite 100 Las Vegas, NV 89101 on [date] 1-4-19

Name (printed) Stephanie BlountTitle (printed) step motherSignature [Signature] Date 1-4-19

ATTACHMENTS

[END OF FORM]

EXHIBIT H

ENTERED

JAN 11 2019

HUALAPAI TRIBAL COURT
PEACH SPRINGS, AZ

IN THE TRIBAL COURT OF THE HUALAPAI NATION
PEACH SPRINGS, ARIZONA

In the Matter of:

NO. 2019-CV-001

Wilfred Whatoname,
Gretna Whatoname,
Plaintiffs,

VS.

**ORDER: Dismissing Due to Lack of
Hualapai Tribal Jurisdiction**

Justin Blount,
Kaydi Rose Blount,
Defendants.

This matter came before the Court for review and consideration of the above-entitled and numbered cause of action.

The Court finds the above-mentioned Plaintiffs wish to intervene in an adoption proceeding located in Las Vegas, Nevada.

Pursuant to Section 2.2, Civil Jurisdiction of the Court "The tribal courts shall have general civil jurisdiction over all actions arising under the Tribal law, including the Constitution, this Code, any ordinances or resolutions adopted by the Hualapai Indian Tribe, and the Tribal Common Law; over all general civil claims which arise within the Tribal jurisdiction; and over all transitory claims in which the defendants may be served within the Tribal Jurisdiction." (Emphasis added)

In this case, the Hualapai Tribal Court lacks jurisdiction over the issue of intervening into an adoption case filed in Las Vegas, Nevada.

Although the Court does find there is a need for Plaintiffs to intervene in the adoption proceeding due to the safety of the children, the Hualapai Tribal Court cannot intervene in a case filed in another Court's jurisdiction.

The Court further finds the children, Jeremiah Blount and Kaydi Rose Blount are members of the Hualapai Indian Tribe, therefore, in the best interest of the children, the Plaintiffs seek the assistance of an Attorney who will readily assist Plaintiffs with their concerns.

Due to the urgency of this matter, the Court refers the Plaintiffs to seek the advice of the Hualapai Public Defender Service or the assistance of Legal Aid Century of Southern Nevada @ www.acsn.org.

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Now Therefore, it is hereby ordered:

The Court dismisses above-entitled and numbered cause of action without prejudice.

This case is closed.

Date: January 11, 2019

Alene Garcia
Alene Garcia, Judge
Hualapai Tribal Court

EXHIBIT I

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Adoption Petition

COURT MINUTES

February 26, 2019

D-19-582179-A

In the Matter of the Petition for Adoption by:
Justin Craig Blount, Stephanie Ann Blount, Petitioner(s).

February 26, 2019 7:30 AM

Minute Order

HEARD BY: Marquis, Linda

COURTROOM: Courtroom 07

COURT CLERK: Victoria Pott

PARTIES:

Jeremiah Blount, Subject Minor, not present

Justin Blount, Petitioner, not present Pro Se

Kaydi Blount, Subject Minor, not present

Stephanie Blount, Petitioner, not present Pro Se

JOURNAL ENTRIES

- NRCP 1 and EDCR 1.10 state that the procedure in district courts shall be administered to ensure efficient, speedy, and inexpensive determinations in every action. Pursuant to EDCR 2.23(c) and 5.11(e), this Court can consider a motion and issue a decision on the papers at any time without a hearing.

On January 29, 2019, the Court continued the Hearing for Adoption to permit the Hualapai Nation Tribe to file a formal objection in this matter as requested at the January 29, 2019, hearing. On February 20, 2019, the Hualapai Nation Tribe filed a Motion to Intervene Pursuant to ICWA. However, no hearing date was scheduled for the abovementioned Motion.

Upon review, the Court determines to hear oral arguments on the Hualapai Nation's Motion to Intervene Pursuant to ICWA and Petitioners' Opposition to the Hualapai Nation Tribe's Motion to Intervene.

Accordingly, the Hualapai Nation's Motion to Intervene Pursuant to ICWA and Petitioners'

PRINT DATE:	02/26/2019	Page 1 of 2	Minutes Date:	February 26, 2019
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

Opposition to the Hualapai Nation Tribe Motion to Intervene shall be heard on April 18, 2019, at 9:15 a.m. in Courtroom 7. Moreover, the continued Hearing for Adoption in this matter currently scheduled for February 27, 2019, shall be rescheduled to be heard concurrently with the above-mentioned pleadings on April 18, 2019, at 9:15 a.m.

A copy of this Minute Order shall be provided to both parties.

CLERK'S NOTE: On 2/26/19, a copy of this Minute Order was mailed to Petitioners at their current address on record and mailed to Sonia Martinez, Esq., Legal Representative for Hualapai Nation. (vp)

INTERIM CONDITIONS:

FUTURE HEARINGS:

Canceled: February 27, 2019 9:30 AM Hearing for Adoption

April 18, 2019 9:15 AM Hearing for Adoption
RJC Courtroom 10A
Marquis, Linda

April 18, 2019 9:15 AM Motion
RJC Courtroom 10A
Marquis, Linda

April 18, 2019 9:15 AM Opposition
RJC Courtroom 10A
Marquis, Linda

PRINT DATE:	02/26/2019	Page 2 of 2	Minutes Date:	February 26, 2019
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

EXHIBIT J

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Adoption Petition

COURT MINUTES

May 03, 2019

D-19-582179-A

In the Matter of the Petition for Adoption by:
Justin Craig Blount, Stephanie Ann Blount, Petitioner(s).

May 03, 2019

9:00 AM

Minute Order

HEARD BY: Hughes, Rena G.

COURTROOM: Courtroom 04

COURT CLERK: Connie Kalski

PARTIES:

Jeremiah Blount, Subject Minor, not present

Justin Blount, Petitioner, not present

Kurt Bonds, Attorney, not present

Kaydi Blount, Subject Minor, not present

Stephanie Blount, Petitioner, not present

Kurt Bonds, Attorney, not present

JOURNAL ENTRIES

Minute order entered at the request of Department J's Law Clerk via e-mail received at 9:12 a.m. 5/3/19.

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 April 17, 2019 the Court held a hearing on the Hualapai Nation's Motion to Intervene Pursuant to the ICWA. At the time of the hearing, ICWA Coordinator Idella Keluche withdrew the Hualapai Nation's request to intervene, based on the Petitioner's Opposition reflecting information that ICWA does not apply. Additionally, Keluche conceded that the Petitioner's Opposition had merit and ICWA does not apply in this particular case, but that the tribe objects to the adoption based upon legal proceedings in Tribal Court.

PRINT DATE:	05/03/2019	Page 1 of 2	Minutes Date:	May 03, 2019
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

At the hearing, the Court Ordered Keluche to inform the Hualapai Tribe's attorney to file a brief regarding what has occurred in the Tribal Court proceedings, what legal action has taken place, and why the Tribe believes it has jurisdiction to enter the custody Orders it had recently entered.

The Court is hereby Ordering the Hualapai Tribe's attorney to file their brief, with points and authorities, within 20 days. The tribal attorney must be licensed to practice law in Nevada or be admitted pro hac vice. After being served with the Hualapai Tribe's brief, Petitioners shall have ten days to file a response. An In Chambers Status Check shall be scheduled for June 12, 2019 for the Court to review and consider the Hualapai Tribe's brief and the Petitioners' Response.

FUTURE HEARINGS: June 12, 2019 3:00 AM Status Check
Courtroom 04
Hughes, Rena G.
Skaggs, Tiffany

PRINT DATE:	05/03/2019	Page 2 of 2	Minutes Date:	May 03, 2019
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

EXHIBIT K

1 SONIA MARTINEZ
2 625 W. SOUTHERN AVENUE SUITE E
3 MESA, Arizona 85210
4 Telephone: (480) 352-5886
5 Fax: (480) 553-8071
6 soniamartinezlaw@gmail.com

7 ICWA LEGAL REPRESENTATIVE FOR
8 HUALAPAI NATION

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11
12 In the Matter of the Petition of:

13 JUSTIN BLOUNT and
14 STEPHANIE BLOUNT

15
16 PETITIONERS

17 RE: ADOPTION

18 KAYDI R. BLOUNT, DOB: 2/19/13
19 JEREMIAH BLOUNT, DOB: 1/19/10

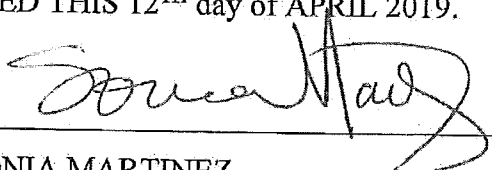
NO. D-19-582179-A

DEPT NO. J

NOTICE OF WITHDRAW OF
HUALAPI TRIBE'S MOTION TO
INTERVENE AND MOTION TO
RECOGNIZE TRIBAL COURT
ORDER


20 COMES NOW, THE HUALAPAI NATION, through it's ICWA designated legal
21 representative undersigned, with a motion to withdraw its motion to intervene and all
22 pleadings in this matter. Upon further reflection of practical and legal issues, the tribe
23 withdraws its motion to intervene and the motion to recognize the tribal court order. Any
24 and all filings, including this motion, have been filed through the nation's designated
25 ICWA representative under federal ICWA law only.
26

1 RESPECTFULLY SUBMITTED THIS 12TH day of APRIL 2019.

2 
3
4 SONIA MARTINEZ,
5 DESIGNATED ICWA LEGAL
6 REPRESENTATIVE FOR THE HUALAPAI NATION
7
8
9

10 **CERTIFICATE OF SERVICE:**

11 ORIGINAL of the foregoing FILED (MAILED)
12 This 12TH DAY OF APRIL 2019 AT:

13 Court Clerk
14 COPY to:
15 DEPT. J JUDGE 

16 COPY of the foregoing delivered
17 This 12TH DAY OF APRIL 2019, to:
18 ALVERSON TAYLOR & SANDERS, ATTORNEY FOR PETITIONERS
19 6605 GRAND MONTECITO PARKWAY, SUITE 200
20 LAS VEGAS, NV 89149
21 EFILE@ALVERSONTAYLOR.COM
22
23
24
25
26

EXHIBIT L

ALVERSON TAYLOR & SANDERS

J. BRUCE ALVERSON
ERIC TAYLOR
LEANN SANDERS
KURT R. BONDS
JONATHAN B. OWENS
KARIE N. WILSON
SHIRLEY BLAZICH
COURTNEY CHRISTOPHER
MATTHEW PRUITT

ADAM R. KNECHT
TREVOR WAITE
SARA D. WRIGHT
TANYA M. FRASER
BRIAN J. MOY
SHEA I. BILLADEAU
ALEXANDER P. WILLIAMS
JOEL K. BROWNING
MAZYAR MOMENI
FARAZ K. KHAN

LAWYERS

LAS VEGAS OFFICE

6605 GRAND MONTECITO PARKWAY, SUITE 200
LAS VEGAS, NEVADA 89149
(702) 384-7000 FAX (702) 385-7000

RENO OFFICE

200 S. VIRGINIA, 8TH FLOOR, RENO, NEVADA 89501
Telephone (775) 398-3025

www.alversontaylor.com

REPLY TO: ☒ Las Vegas Office ☐ Reno Office

YULIYA DAVIDZENKA
ANTHONY M. POPE
BLAKELY D. STAUFFER
DAVID M. SEXTON
DEREK LINFORD
TINA FORTIER
WILLIS J. BOWDEN, III
D. ANDREW LAJOIE
IRINA Z. ANSELL*

OF COUNSEL
JACK C. CHERRY
(1932 - 2015)

* Licensed only in California

May 14, 2019

Via Email YWescogame@Hualapai-nsn.gov

Original Via US Mail

Sharon Begay-McCabe
Pro Tem Judge
Hualapai Tribal Court
P.O Box 275
960 Rodeo Way
Peach Springs, AZ 86434

Re: Representation of Justin Blount
Hualapai Case: 2019-CC-004
ATS File No.: 26109

Dear Judge Begay-McCabe:

This correspondence is sent as a follow up to the hearing held in your court on May 8, 2019 in the above referenced case. Please allow me to begin by apologizing if anything I said came off as condescending, rude, or presumptive. I assure you that I meant only respect for you, your staff, and the Hualapai nation. The check for the contempt fine imposed against me at the hearing has been sent to you and should have arrived, or it will arrive in the mail shortly.

Shortly after returning from the hearing I had a call with the Blount's to discuss the hearing and the outcome. During this phone conversation the Blount's indicated that they would likely be seeking alternative counsel to represent them further in the case. Enclosed in this correspondence you will find an email from David Sexton to Mr. Blount dated May 9, 2019, recapping the hearing outcome in written form with Mr. Blount's response to that email as well as confirming our May 8th phone conversation. As you can see in Mr. Blount's email, Mr. Blount has terminated our representation of him in all matters before the Hualapai Court, effective immediately.

As a result, neither I nor anyone from the law firm of Alverson Taylor & Sanders is authorized to proceed with any representation of Mr. Blount in the Hualapai Tribal Court and are further "not authorized to correspond, intervene, appear on our behalf, or except service on our behalf in this matter any further." As we are no longer legally authorized to take any action on



ALVERSON TAYLOR & SANDERS

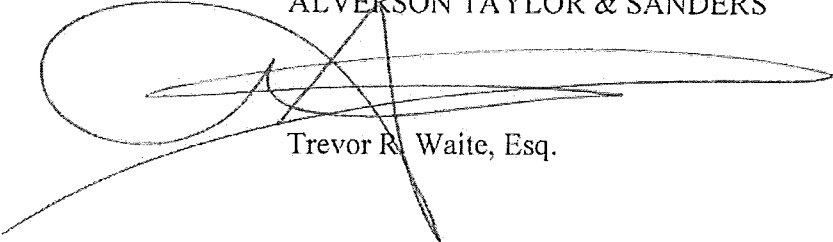
Page Number: 2

Continuing Letter: May 14, 2019

behalf of Mr. Blount, per his express direction, we will not be appearing in the Hualapai Court any further in this action. Also, per Mr. Blount's express direction we are no longer authorized to further correspond with the Hualapai Tribal Court on his behalf. Please direct all future correspondence in this matter directly to Mr. Blount at the address on file with the Hualapai Tribal Court.

Very truly yours,

ALVERSON TAYLOR & SANDERS



Trevor R. Waite, Esq.

TRW/kf
Enclosure

N:\kurt.grp\CLIENTS\26100\26109\letters\ltr to court-03-representation.docx

Trevor Waite

From: David Sexton
Sent: Thursday, May 09, 2019 3:42 PM
To: Justin Blount (justincblount1@gmail.com)
Cc: Trevor Waite
Subject: Results of Hearing in Hualapai Tribal Court on May 8, 2019

Dear Justin and Stephanie,

I am writing this email to inform you of the outcome of the hearing that Trevor and I attended on your behalf in the Hualapai Tribal Court on May 8, 2019. As we discussed on the phone, we attended the hearing and made a special appearance solely contesting the jurisdiction of the Hualapai Tribal Court regarding the 3rd Party Petition for Custody filed there by the maternal grandparents. We made our special appearance and presented our arguments related to the issue of jurisdiction. The Court rejected our arguments and made a finding that they do have jurisdiction in this matter. Although we have not received a written order signed by the judge, the judge made the following orders from the bench:

- Jeremiah and Kaydi must be turned over to their grandparents by **Friday, May 10, 2019**
- A full hearing related to the 3rd Party Petition for Custody was set for **May 28, 2019 at 2:00 PM**
- Justin must be at the hearing scheduled for May 28, 2019

We wanted to be sure and make you aware of the orders that the judge entered. You should also be aware that the judge held Trevor in contempt of court and ordered him to pay a \$100 fine. If you have any questions about the outcome of the hearing or any of the orders that the judge made, feel free to contact us.

Sincerely,

David Sexton, Esq.



6605 Grand Montecito Pkwy., Suite 200, Las Vegas, NV 89149
702.384.7000 Office 702.385.7000 Fax
[website](#) | [map](#) | [email](#)

Trevor Waite

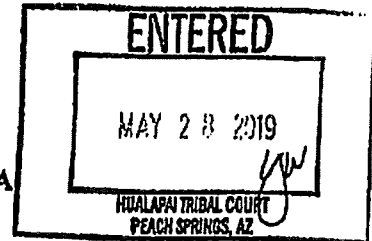
From: Justin Blount <justincblount1@gmail.com>
Sent: Monday, May 13, 2019 1:37 PM
To: David Sexton; Trevor Waite
Subject: Re: Results of Hearing in Hualapai Tribal Court on May 8, 2019

Thank you for your legal aid thus far in the 3rd party custody case in the tribe; however, in response to the phone conversation we held with y'all on May 8th, we want to be sure we are on the same page. Upon having hired Alverson Taylor & Sanders and affiliated attorneys, it was agreed that y'all's service, in the 3rd party custody case in the tribe, was for that of the jurisdiction issues and nothing further. This week's hearing has made it clear to us that we need to find an attorney with more tribal experience who can handle all the issues of this case to take the case from here. So as of now and in the future Alverson Taylor & Sanders and all affiliated legal aid persons are not authorized to correspond, intervene, appear on our behalf, or except service on our behalf in this matter any further.

- Justin Blount

EXHIBIT M

IN THE HUALAPAI JUVENILE COURT
HUALAPAI INDIAN RESERVATION, ARIZONA



In the matter of:

Jeremiah C. Blount D.O.B 1/19/10
Kaydi R. Blount D.O.B 2/19/13

Case No.: 2019-CC-004

MINUTE ORDER

Parent(s),

The following proceeding or action occurred on the 28th day of May, 2019, A.D. at 02:00 PM in this Court:

☒ Other Adjudicatory Hearing

Persons present were:

☒ Plaintiff/Petitioner WHATONAME, GRETNA
☒ Plaintiff's Counsel FOX, CANDACE
NP Parent(s): BLOUNT, JUSTIN;
NP Defense's Counsel Trevor Waite
 Other

Evidence/Action: THE PETITIONER IS PRESENT WITH HER COUNSEL CANDACE FOX. THE RESPONDENT IS NOT PRESENT AND HIS ATTORNEY IS NOT PRESENT IN COURT. THE COURT DID ISSUE A ORDER TO SHOW CAUSE AGAINST THE RESPONDENT FOR FAILING TO COMPLY WITH ORDER OF THE COURT ENTERED ON MAY 8, 2019.

The Court found and Ordered: THE COURT SHALL ENTER A DEFAULT JUDGMENT AND ORDERS THE PETITIONER IS GRANTED CUSTODY OF THE MINOR CHILDREN. THE COURT SHALL VACATE THE ORDER TO SHOW CAUSE AGAINST THE RESPONDENT. THE RESPONDENT SHALL RETURN THE CHILDREN TO THE PETITIONER.

Hearing/Trial is CONTINUED.

Complaint/Petition is DISMISSED with prejudice/without prejudice

The Court further ordered all parties and counsel to appear before the Court for

Date: May 28, 2019

Tribal Court Judge

I certify that I distributed copies to: ☒ Plaintiff ☒ Plaintiff's Counsel ☐ Respondent ☐ Respondent's Counsel ☐ Other: on May 28, 2019 By JH (Revised November 2010)

I hereby certify that this is
a true and correct copy of the
instrument on file in the court
of the Hualapai Tribe.

Court Clerk
Hualapai Tribal Court

EXHIBIT N

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Adoption Petition

COURT MINUTES

June 12, 2019

D-19-582179-A

In the Matter of the Petition for Adoption by:
Justin Craig Blount, Stephanie Ann Blount, Petitioner(s).

June 12, 2019

3:00 AM

Status Check

HEARD BY: Hughes, Rena G.

COURTROOM: Courtroom 04

COURT CLERK: Tiffany Skaggs

PARTIES:

Jeremiah Blount, Subject Minor, not present

Justin Blount, Petitioner, not present

Kurt Bonds, Attorney, not present

Kaydi Blount, Subject Minor, not present

Stephanie Blount, Petitioner, not present

Kurt Bonds, Attorney, not present

JOURNAL ENTRIES

- MINUTE ORDER: NO HEARING HELD AND NO APPEARANCES

IC Decision 6/12/19

D-19-582179-A

Blount v Blount

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.

This matter came on for consideration on the Court's in chambers calendar for a status check on the Hualapai Nation's brief and the Petitioners' response to brief. On May 3, 2019 a Minute Order was entered Ordering the Hualapai Tribe's attorney to file a brief regarding what has occurred in the

PRINT DATE:	06/12/2019	Page 1 of 2	Minutes Date:	June 12, 2019
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

Tribal Court proceedings, what legal action has taken place, and why the Tribe believes it has jurisdiction to enter the custody Order it had recently entered. The Hualapai Tribe was Ordered to file their brief, with points and authorities, within 20 days. Upon service of the brief, Petitioners were granted ten days to file a response.

The Court finds that the Hualapai Tribe has failed to file and serve their brief. On May 30, 2019 Petitioners filed a Notice of Non-Opposition and Request for Expedited Prove Up Hearing.

The Court is hereby setting the matter for a prove up hearing on the Petitioner s request for adoption. The hearing shall take place on July 3, 2019 at 10:00AM.

Clerk's note, a copy, of today's minute order was mailed, to the parties and counsel, at the addresses, on file.

INTERIM CONDITIONS:

FUTURE HEARINGS:

July 03, 2019 10:00 AM Hearing for Prove Up/Default
Courtroom 04
Hughes, Rena G.
Skaggs, Tiffany

PRINT DATE:	06/12/2019	Page 2 of 2	Minutes Date:	June 12, 2019
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

EXHIBIT O

Steven D. Grierson

1 DECA
2 ALVERSON TAYLOR & SANDERS
3 KURT R. BONDS, ESQ.
4 Nevada Bar #6228
5 TREVOR R. WAITE, ESQ.
6 Nevada Bar #13779
7 DAVID M. SEXTON, ESQ.
8 Nevada Bar #14951
9 6605 GRAND MONTECITO PARKWAY
10 SUITE 200
11 LAS VEGAS, NEVADA 89149
12 cfile@alversontaylor.com
13 *Attorneys for Justin and Stephanie Blount*

DISTRICT COURT

CLARK COUNTY, NEVADA

.*-

In re the matter of the Petition of:

CASE NO.: D-19-582179-A
DEPT. NO.: J

JUSTIN BLOUNT and
STEPHANIE BLOUNT

Hearing Date: July 3, 2019
Hearing Time: 10:00 am

Petitioners,

RE: ADOPTION
KAYDI ROSE BLOUNT, DOB: 2/19/13
JEREMIAH CALEB BLOUNT, DOB: 1/19/10

Persons under 18 years of age.

DECREE OF ADOPTION

This Court, having reviewed the Petition for Adoption filed by the Petitioners JUSTIN BLOUNT and STEPHANIE BLOUNT and the matter coming on regularly to be heard before this Court on the date and time above, and the Petitioners appearing personally, and it appearing to the satisfaction of the Court that all required consents to adoption have been filed with this Court and the Court having considered said documents, and the Court having further examined all documents executed and filed herein, and finding them in all respects proper, and the Court having waived the

ALVERSON TAYLOR & SANDERS
LAWYERS
6605 GRAND MONTECITO PARKWAY, SUITE 200
LAS VEGAS, NEVADA 89149
(702) 384-7000

☐ Disposed After Trial Start
☐ Trial Disposition:
☐ Settled/Withdrawn
☐ Without Judicial Conf/Itg
☐ By ADR
☐ Judgment Reached by Trial

1 requirement for a child welfare services investigation, and having examined the Petitioners under
2 oath, from which examination the Court finds that all of the allegations of said Petition are true; if
3 there are two Petitioners, they are married; the Petitioners have been residents of Clark County for at
4 least six months; the Petitioners are more than ten years older than the minor children; the Petitioners
5 are financially able to provide for he support and maintenance of the minor children; and it further
6 appearing to the satisfaction of the Court that the best interests of the children will be promoted by
7 this adoption; and it further appearing to the Court that there has been a full compliance with the
8 laws of the State of Nevada relating to adoptions and a full compliance with N.R.S. 127.220 to
9 127.310, inclusive.
10

11 **IT IS THEREFORE ORDERED** that the Petitioners JUSTIN BLOUNT and STEPHANIE
12 BLOUNT are declared the legal and/or adoptive parents of the following children: KAYDI ROSE
13 BLOUNT (DOB: 2/19/13) and JEREMIAH CALEB BLOUNT (DOB: 1/19/10).
14

15 **IT IS FURTHER ORDERED** that if a Petitioner has existing parental rights to the children,
16 those rights shall remain unaffected.
17

18 **IT IS FURTHER ORDERED** that the minor children's names shall not be changed.

19 **IT IS FURTHER ORDERED** that any other parent named on the children's birth
20 certificates shall be removed, and Petitioners' names shall appear on the birth certificate as the only
21 parents to the children
22

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 **IT IS FURTHER ORDERED** that the minor children shall henceforth be regarded and
2 treated as Petitioner's natural children and have all the lawful rights as his/her own child, including
3 the rights of support, protection and inheritance.

4 DATED this 3 day of July, 2019.

5
6 
7 DISTRICT COURT JUDGE

8 Respectfully Submitted by:

RENA G. HUGHES

9 ALVERSON TAYLOR & SANDERS

10 
11 KURT R. BONDS, ESQ.

12 Nevada Bar #6228

13 TREVOR R. WAITE, ESQ.

14 Nevada Bar #13779

6605 Grand Montecito Pkwy, Ste 200

Las Vegas, NV 89149

Attorneys for Petitioners

EXHIBIT P

Paula Blount
(Petitioner's name)

(Co-Petitioner's name)

PO Box 6856
(Petitioner's mailing address)

Kingman, AZ 86402

3834 E. Lass Ave
(Petitioner's physical address)

Kingman, AZ 86409

Petitioner's phone: 928-303-9955

PETITIONER(S)

**IN THE HUALAPAI TRIBAL COURT
PEACH SPRINGS, ARIZONA**

In the Matter of:

Paula Blount
(Your name)

(Other grandparent's name, if applicable)

Petitioner(s)

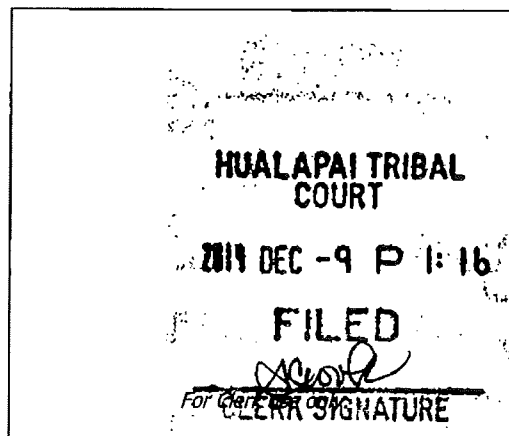
And concerning

Jeremiah Blount
(Name of child/children's mother)

Kaydi Blount
(Name of child/children's father)

☐ Justin Blount
(Name of child/children's current legal Guardian or Custodian if not in the legal custody of a parent)

☐ **HUALAPAI HUMAN SERVICES**
(If child/children have been removed from the parents by the court)



Case No. _____

**PETITION FOR
GRANDPARENT
VISITATION**

COMES NOW the Petitioner and pursuant to Sec. 1.4, Sec. 2.2, Sec. 20.4, and Sec. 20.7 of the Hualapai Law and Order Code files this Petition and upon information and belief alleges as follows: *(if any required information is not known, write "unknown" in the appropriate space)*

RS
12/10/11

1. I (the Petitioner) live ☐ within ☒ outside the Hualapai Reservation.

2. My date of birth is 12/5/60.

3. I am ☒ a non-Indian ☐ an Indian enrolled with (list tribe) _____.

☐ 4. The Co-Petitioner lives ☐ within ☐ outside the Hualapai Reservation.

☐ 5. The Co-Petitioner's date of birth is _____.

☐ 6. The Co-Petitioner is ☐ a non-Indian ☐ an Indian enrolled with (list tribe) _____.

7. My/our relationship to the child (ren) is:

☐ Grandparent on Mother's side

☒ Grandparent on Father's side

☐ Other: (explain) _____.

8. The name, age and residence of each child who is the subject of this Petition is:

(Name)	(D.O.B. & age)	(Residence address)
Jeremiah Blount	1/19/10	100 N. Wallace Dr. Bldg 12 #156
Kaydi Blount	2/19/13	Las Vegas, NV 89107

9. Tribal enrollment/eligibility of each child who is the subject of this Petition is:

(Name)	(Identify tribal affiliation)	(Enrolled/Eligible)
Jeremiah Blount	Hualapai	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
Kaydi Blount	Hualapai	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
		<input type="checkbox"/> <input type="checkbox"/>
		<input type="checkbox"/> <input type="checkbox"/>
		<input type="checkbox"/> <input type="checkbox"/>
		<input type="checkbox"/> <input type="checkbox"/>

10. The names and addresses of the parents, guardian(s), and/or current legal custodian(s) are:

Gretchen Blount	deceased
(Mother's name)	(Address)
Justin Blount	100 N. Wallace Dr Bldg 12 #156
(Father's name)	(Address)
	Las Vegas, NV 89107
(Father's name)	(Address)
	(Address)

_____ (Guardian's name)	_____ (Address)
_____ (Guardian's name)	_____ (Address)
_____ (Name of person who has court-ordered custody)	_____ (Address)
_____ (Name of person who has court-ordered custody)	_____ (Address)

11. Tribal enrollment/eligibility of each Parent or Guardian is:

(Name)	(Tribal affiliation)	(Enrolled/Eligible)	
_____	_____	[]	[]
_____	_____	[]	[]
_____	_____	[]	[]
_____	_____	[]	[]
_____	_____	[]	[]
_____	_____	[]	[]

☒ 12. The Mother of the child (ren) is deceased.

[] 13. The Father of the child (ren) is deceased.

☒ 14. The father is listed as a parent on the birth certificate for the following child (ren):

Jeremiah Blount
Kaydi Blount

[] 15. If the father is not listed on the birth certificate, paternity has been established for the following child (ren):

(Child's name)	(Father's name)	Paternity established by		
		DNA test	Ct. Order	Affidavit
_____	_____	[]	[]	[]
_____	_____	[]	[]	[]
_____	_____	[]	[]	[]
_____	_____	[]	[]	[]
_____	_____	[]	[]	[]
_____	_____	[]	[]	[]

16. To my knowledge, there [] IS [] IS NOT [] I DON'T KNOW a [] current JDN case in the Hualapai Court or [] child dependency/ neglect case pending in state court or another tribal court or [] PREVIOUS CLOSED CASE involving the child (ren). Provide case number, if there is a case pending: _____.

17. To my knowledge, there ☐ IS ☐ IS NOT ☐ I DON'T KNOW a current 3rd party custody case in the Hualapai Court, another tribal court or in a state court involving one or more of this/these child(ren). Provide case number, if there is a case pending: _____.

18. To my knowledge, there ☒ IS ☐ IS NOT ☐ I DON'T KNOW an ☒ open or ☐ closed child custody case between the parents in the Hualapai Court, another tribal court or a state court involving this/these child(ren). Provide case number if there is a case pending: 2019-CC-004

19. Statements about your relationship with the minor child(ren), and why you think it is best for the child(ren) that you have visitation with them (when possible, refer to the factors set forth in Sec. 20.6 of the Code):

Jeremiah & Kaydi Blount has lived with me off and on all their lives. Justin & Gretchen Blount (the parents) have lived with me also. Jeremiah & Kaydi has spent every holiday with me and the other grandparents. We have been with Jeremiah and Kaydi Blount for everything up until 12/29/17 when their mother passed away 12/27/19 and Justin took the children not allowing anyone to see or talk to the children since 2/4/17. Jeremiah has been abused by step-mom. The children are in and out of school. They are now labeled children with special needs. (Attach additional sheets if necessary.)

20. Describe in detail what your request is for visitation with the minor child (ren):

☐ **IN-PERSON CONTACT/VISITATION**

☐ During the week (be specific about location and which day(s) and time) _____

☒ On the weekends (be specific about location and which day(s) and time) Every other Friday 4pm return Sunday 6pm. at 3834 E. Lass Ave Kingman, Az 86409

☐ During the summer months or school breaks (be specific about location and which day(s) and time) June and July each year. for two months pick up 6/1 5pm return 7/31 6pm. 3834 E. Lass Ave Kingman, Az 86409

☒ For holidays and birthdays (be specific about location and which holiday(s) and time) Christmas break every other ^{xmas} Break. Pick up 12/24 5pm return 1/3 6pm 3834 E. Lass Ave Kingman, Az 86409

☐ TRANSPORTATION will be provided by (name) Paula Blount
As follows: Paula Blount will pick up and return

[] TELEPHONIC OR ELECTRONIC VISITATION

☒ For telephone calls (be specific about which day(s), time of day and call duration) Wednesdays 6pm & Sundays 3pm on weeks I don't see them. I will speak to them alone. Not recorded or on speaker. Paula will call them.

☐ For streaming online, social media or other electronic visitation (be specific about which day(s), time of day and contact duration) _____

[] OTHER: _____

21. The undersigned Petitioner believes these facts to be true to the best of his/her knowledge and belief and that the relief requested is in the best interest of the child (ren).


WHEREFORE, Petitioner prays that the Court:

1. Declare pursuant to the Hualapai Law and Order Code, Chapter 20 (Grandparents' Visitation Rights) that Petitioners have a right to periodic and meaningful contact and visitation with the minor child (ren) as requested above or as otherwise may be established by the Court.
2. Order that Petitioners may exercise periodic and meaningful contact and visitation with the minor children as requested above or as otherwise established by the Court
3. Such other and further relief as the Court deems appropriate, just, and fair under the circumstances.

RESPECTFULLY SUBMITTED this 9th day of December, 2019.

UNDER OATH OR AFFIRMATION

I swear or affirm under penalty of perjury that the contents of this document are true and correct to the best of my knowledge and belief.

By: 
(Petitioner's signature)

By: _____
(Co-Petitioner's signature)

Paula Blount
(Print or type name)

(Print or type name)

SUBSCRIBED AND SWORN TO before me this 9th day of December, 2019.
(Apply Notary seal below)

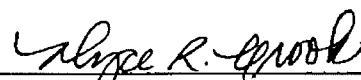

☒ Court Clerk ☐ Notary Public

EXHIBIT Q

EXHIBIT R

ENTERED

JAN 30 2020

HUALAPAI TRIBAL COURT
PEACH SPRINGS, AZ

HUALAPAI TRIBAL COURT
P.O. BOX #275
960 RODEO WAY
PEACH SPRINGS AZ 86434
PHONE: 928.769.2338
FAX: 928.769.2736
[HTTP://HUALAPAI-NSN.GOV/GOVERNMENT/TRIBAL-COURT/](http://hualapai-nsn.gov/government/tribal-court/)

IN THE TRIBAL COURTS OF THE HUALAPAI TRIBE
PEACH SPRINGS, STATE OF ARIZONA

In re the Custody/Visitation of

No. 2019-CC-004

JEREMIAH BLOUNT (DOB: 1/19/2010)
KAYDI BLOUNT (DOB: 2/19/2013)

Minor Children,

PAULA BLOUNT,

Grandmother/Petitioner,

vs.

JUSTIN BLOUNT,

Father/Respondent.

GRANDPARENT CUSTODY AND VISITATION
ORDER

(Hon. Kaniatarisio Jesse Gilbert)

A Motions Hearing was conducted on January 30, 2020, at 0830hrs. The presiding judge is Hon. Kaniatarisio Jesse Gilbert (for Hon. Rudy Clark Jr.); clerk is Tawnya Shongo. A recording of the proceedings is made in lieu of a court reporter. The Petitioner is present and is represented by Advocate Candace Fox; Respondent is NOT present, nor is Respondent's counsel of record - Trevor Waite of the firm of Alverson, Taylor & Sanders (Las Vegas, NV). *The Petitioner confirmed their address as PO Box #6856, Kingman AZ 86402/3834 E. Lass Avenue, Kingman AZ 86409.*

This Court has exercised jurisdiction over these children, who are enrolled members of the Hualapai Tribe, since the original petition for custody was filed by the children's mother on February 26, 2019. The Petition noted child dependency proceedings occurring in the state courts of Nevada. This Court has since continued to exercise jurisdiction over these children.

Paula Blount v. Justin Blount, 2019-CC-004

Page 1

1 On December 9, 2019, the Petitioner filed a Petition for Grandparents Visitation Rights
2 pursuant to Chapter 20 of the Hualapai Law & Order Code. The matter was set for a Motion
3 Hearing, and Notice was e-mailed to the Respondent's counsel of record on December 30, 2019, at
4 1549hrs. The Clerk reports that there has been no returned-e-mail as undeliverable. The Court
5 does note, however, that there are errors in the Notice, specifically the caption is mistakenly
6 captioned as "Waite, Trevor v. Blount, Justin/Whatoname, Gretchen" and the date on the Notice is
7 listed as February 26, 2019. It does, however, give notice of a Motion Hearing on today's date at
8 0900hrs, and Mr. Waite could have contacted the Court to seek clarification.

9 "If the defendant fails to appear at any pre-trial proceeding or at the trial of a civil
10 matter...without cause, judgment may be entered for the plaintiff by default." Hual.Civ.P.C. §
11 4.13(A)(2). This matter was set for 0900hrs. It was initially called at approximately 0903hrs. As is
12 the standard practice of this Court, the absent party was given a fifteen (15) minute courtesy period
13 to arrive in a substantive hearing. At 0915hrs, the Court noted that the Respondent had still not
14 appeared and entertained motions. Ms. Fox moved for default judgment, which was granted, and
15 the terms requested in the Petition shall be awarded. The Respondent may appeal this decision by
16 exercising his rights under Chapter 10 of the Hualapai Law & Order Code within thirty (30) days of
17 the date of this Order.

18 *The Court noted that since this is a Tribal Court Order, that in order to ensure it's*
19 *enforceability in the State of Nevada, then the Petitioner may wish to domesticate this*
20 *Order in Nevada.*

21 **THEREFORE, IT IS HEREBY ORDERED that:**

- 22 1. This Court has jurisdiction over this child custody proceeding because the child is an
23 enrolled member of the Hualapai Tribe or is eligible for membership, Hual.Dom.Rel.C. §
24 12.29(A)(1), Hual.Grandparents.Rts.C. § 20.4(A)(a);
- 25 2. The Petitioner's Motion is hereby GRANTED BY DEFAULT, Hual.Civ.P.C. § 4.13(A)(2),
Hual.Grandparents.Rts.C. § 20.9;
3. The Respondent (Justin Blount) is awarded Joint-Legal and Joint-Physical custody of the
following minor children:
 - a. Jeremiah Blount (DOB: 1/19/2010);
 - b. Kaydi Blount (DOB: 2/19/2013);
4. The Petitioner, Paula Blount, is awarded Joint-Legal and Joint-Physical custody of these
same minor children for the periods during which custody and visitation is awarded;

1 5. Grandparent Custody and Visitation Schedule: The Petitioner is awarded custody and
2 visitation time with these children under the following terms and conditions, and in the
3 terms stated:

4 a. Every other weekend, beginning on Fridays at 1600hrs (Nevada Time) and ending
5 on Sundays at 1800hrs (Nevada Time), starting on Friday, February 7, 2020, and
6 alternating every other weekend thereafter;

7 b. The Months of June and July in every year, beginning on June 1, at 1700hrs (Nevada
8 Time) and ending on July 31, at 1800hrs (Nevada Time);

9 c. Christmas breaks in every even-numbered year, beginning on December 24, Even-
10 Year, at 1700hrs (Nevada Time) and ending on January 3, Odd-Year, at 1800hrs
11 (Nevada Time);

12 d. Telephonic Visitation: The Petitioner is awarded telephonic visitation with the
13 children on:

14 i. Every Wednesday, at 1800hrs (Nevada Time); and

15 ii. Sundays when the Petitioner does not have custody/visitation with the
16 children, at 1500hrs (Nevada Time);

17 iii. The telephone calls shall not be monitored or conducted on speakerphone;

18 iv. The Petitioner shall be responsible for making the phone calls to the children
19 and bear the costs;

20 v. During June and July when the children are with the Petitioner, the
21 Respondent (Justin Blount) shall have reciprocal telephonic visitation rights
22 under the same terms and conditions outlined above;

23 e. Pick Up & Drop-Off: The Petitioner, Paula Blount, shall be responsible for picking
24 up the children and returning the children to their father pursuant to the visitation
25 schedule outlined above, and bear the costs of travel;

f. Visitation Location: The Petitioner, Paula Blount, may exercise her visitation with
the children at her residence at 3834 E. Lass Avenue, Kingman, Arizona, 86409;

i. If the Petitioner intends to spend significant visitation time (i.e., overnight)
with the children in some other location, then the Petitioner shall ensure that
the Respondent (Justin Blount) is aware of the location and has the ability to
communicate with the Petitioner during those periods;

1 g. Failure to abide by the terms of this Order may result in an Order to Show Cause
2 Hearing and if found in contempt of court, the result may be imprisonment for a
3 period not to exceed 30 days, a fine of up to \$500.00, or both, Hual.Civ.Contempt.C.
4 § 8.1, § 8.2;

5 6. As this award was granted by Default Judgment, the Respondent maintains his right to
6 appeal this Order to the Hualapai Court of Appeals by filing a Notice of Appeal within thirty
7 (30) days of the date of this Order, Hual.Ct.App.P.C. § 10.3, § 10.4;

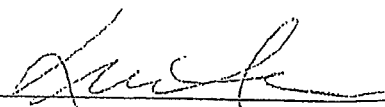
8 7. No Badmouthing: Both Parties are ordered not to badmouth the other party to the Minor
9 Children at all times;

10 8. Mutual Modification: this Order may be modified by mutual agreement between the Parties;

11 9. The Parties are advised that "[n]o motion to modify a custody decree may be made earlier
12 than one year after its date, unless the Court permits it to be made on the basis of affidavits
13 that there is reason to believe the child's present environment may endanger his physical,
14 mental, or emotional health, safety or welfare, Hual.Dom.Rel.C. § 12.31(B).

15 ORDERED on this 30th day of January, 2020.

16 HUALAPAI TRIBE
17 TRIBAL COURT

18 
19 HON. KANIATARRIO JESSE GILBERT

20 Copies of the foregoing mailed/delivered this date to:

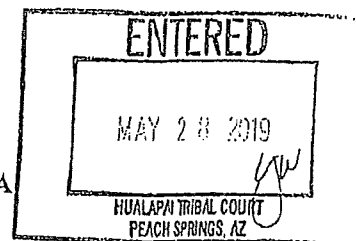
21 ☒ Clerk of the Court (Original)
22 ☒ Candace Fox – 2364 Wiki Way, Camp Verde AZ 86322.
23 ☒ Paula Blount – PO Box #6856, Kingman AZ 86402 (Certified Copy).
24 ☒ Trevor Waite – Alverson, Taylor & Sanders, 6605 Grand Montecito Parkway, Suite 200, Las Vegas NV 89149.
25 ☒ Justin Blount – 100 N. Wallace Dr., Bldg 12 #156, Las Vegas NV 89107.

By: Jawniga Shongo

I hereby certify that this is
a true and correct copy of the
instrument on file in the court
of the Hualapai Tribe.

Jawniga Shongo
Court Clerk
Hualapai Tribal Court

IN THE HUALAPAI JUVENILE COURT
HUALAPAI INDIAN RESERVATION, ARIZONA



In the matter of:

Jeremiah C. Blount D.O.B 1/19/10

Kaydi R. Blount D.O.B 2/19/13

Case No.: 2019-CC-004

MINUTE ORDER

Parent(s),

The following proceeding or action occurred on the 28th day of May, 2019, A.D. at 02:00 PM in this Court:

☒ Other Adjudicatory Hearing

Persons present were:

☒ Plaintiff/Petitioner WHATONAME, GRETNA

☒ Plaintiff's Counsel FOX, CANDACE

☐ NP Parent(s): BLOUNT, JUSTIN;

☐ NP Defense's Counsel Trevor Waite

☐ Other

Evidence/Action: THE PETITIONER IS PRESENT WITH HER COUNSEL CANDACE FOX. THE RESPONDENT IS NOT PRESENT AND HIS ATTORNEY IS NOT PRESENT IN COURT. THE COURT DID ISSUE A ORDER TO SHOW CAUSE AGAINST THE RESPONDENT FOR FAILING TO COMPLY WITH ORDER OF THE COURT ENTERED ON MAY 8, 2019.

The Court found and Ordered: THE COURT SHALL ENTER A DEFAULT JUDGMENT AND ORDERS THE PETITIONER IS GRANTED CUSTODY OF THE MINOR CHILDREN. THE COURT SHALL VACATE THE ORDER TO SHOW CAUSE AGAINST THE RESPONDENT. THE RESPONDENT SHALL RETURN THE CHILDREN TO THE PETITIONER.

Hearing/Trial is CONTINUED.

Complaint/Petition is DISMISSED with prejudice/without prejudice

The Court further ordered all parties and counsel to appear before the Court for

Date: May 28, 2019

Tribal Court Judge

I certify that I distributed copies to ☒ Plaintiff ☐ Plaintiff's Counsel ☐ Respondent ☐ Respondent's Counsel
Other: on May 28, 2019 By Revised November 2010

I hereby certify that this is
a true and correct copy of the
instrument on file in the court
of the Hualapai Tribe.

Court Clerk
Hualapai Tribal Court

EXHIBIT S

Candace Fox
2364 Wulu Way
Camp Verde, AZ. 86322
928-594-6970 phone
Email: najuh@yahoo.com

HUALAPAI TRIBAL
COURT

2020 MAR -9 A 8 44

FILED

IN THE HUALAPAI TRIBAL COURT

HUALAPAI INDIAN RESERVATION, STATE OF ARIZONA

GRETNA AND WILFRED WHATONAME) Case No.: 2019-CC-004

JR.,)

Petitioners,)

VS.)

JUSTIN BLOUNT,)

Respondent)

Concerning: KAYDIE AND JEREMIAH

BLOUNT, child

MOTION TO AMEND CUSTODY ORDER
TO INCLUDE PATERNAL
GRANDPARENT

Undersigned counsel hereby makes this Motion to hold a hearing to amend to custody order issued to the maternal grandparents to include the paternal grandmother Paula Blount, so the grandparents can share custody of the children.

The custody was awarded to maternal grandparents however, the Respondent has failed to surrender the children.

Parties are requesting a hearing to add paternal grandmother Paula Blount to share custody of the grandchildren.

Submitted this 6th day of March 2020.



A copy will be forwarded to opposing party via US Postal service on this day

EXHIBIT T

1 **ACSR**
2 WILICK LAW GROUP
3 MARSHAL S. WILICK, ESQ.
4 Nevada Bar No. 2515
5 3591 E. Bonanza Road, Suite 200
6 Las Vegas, NV 89110-2101
7 Phone (702) 438-4100; Fax (702) 438-5311
8 email@willicklawgroup.com
9 Attorneys for *Petitioner*

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

13 In re the Custody Visitation of
14 JEREMIAH BLOUNT (DOB: 1/19/2010);
15 KAYDI BLOUNT (DOB: 2/19/2013)

16 Minor Children,

17 PAULA BLOUNT,

18 Grandmother/Petitioner,

19 vs.

20 JUSTIN BLOUNT,
21 GRETCHEN WHATONAME,

22 Father/Respondent.

CASE NO: D-20-605933-F
DEPT. NO: F

DATE OF HEARING: N/A
TIME OF HEARING: N/A

23 **ACCEPTANCE OF SERVICE**

24 I, Trevor Waite, attorney for the Father/Respondent, hereby accept service of
25 the *Notice of Filing Registration of Foreign Custody Order* and *Registration of*


26 *****

27 *****

28 *****

1 *Foreign Custody Order*, in the above-entitled matter this 6th day of April
2 , 2020, at 7:45 o'clock. A. M. on behalf of Father/Respondent, Justin
3 Blount.

4
5 ALVERSON TAYLOR & SANDERS

6 
7 _____
8 TREVOR WAITE, ESQ.
9 Nevada Bar No. 011312
6605 Grand Montecito Pkwy., Suite 200,
Las Vegas, NV 89149
(702) 384-7000
Attorney for *Father/Respondent Justin Blount*

10
11 P:\wp19\BLOUNT,\PDRAFTS\00432143.WPD/vj

EXHIBIT U

IN THE HUALAPAI JUVENILE COURT
HUALAPAI RESERVATION, ARIZONA

ENTERED

MAY 13 2020

HUALAPAI TRIBAL COURT
PEACH SPRINGS, AZ

IN THE MATTER OF:

JEREMIAH BLOUNT,

DOB: 01/19/2010

A Minor

Case No. 2019-CC-004

MINUTE ORDER

The following proceeding or action occurred on the 13th day of May, 2020 at 10:00 AM in this Court:

For a/an Motion Hearing/Telephonic appearance

Persons present were: X Plaintiff: Gretna & Wilfred Whatoname
X Plaintiff counsel: C. Fox
____ Parent(s)/Respondent: Justin Blount
____ Respondent counsel: Trevor Waite
X Other: Paula Blount

Evidence/Action: RESPONDENT'S ARE NOT PRESENT AND WERE PROPERLY SERVED W/NOTICE. PLAINTIFF'S COUNSEL PRESENTS MOTION TO INCLUDE PAULA BLOUNT IN THE PETITION.

The Court found and ordered: GRANTS MOTION BY DEFAULT AND INCLUDES PAULA BLOUNT IN THE AMENDED PETITION W/SHARED CUSTODY BETWEEN GRANDPARENTS. PLAINTIFF'S COUNSEL SHALL PROVIDE THE COURT W/A PROPOSED ORDER.

Tribal Prosecutor is directed to prepare and submit disposition recommendations by ____

The Court further ordered all parties, counsel, and interested persons to appear before the Court for a ____ on ____ at ____

Date: May 13, 2020


Tribal Court Judge

I certify that I have distributed copies to: ☒ Prosecutor ☐ Minor's Counsel ☒ Parent(s) ☒ Minor ☐ HJDRC ☐ Probation ☐ Other: _____
by _____ on 05/13/2020 (Revised 1/2016)

EXHIBIT V

ALVERSON TAYLOR & SANDERS
LAWYERS
6605 GRAND MONTECITO PARKWAY
SUITE 200
LAS VEGAS, NEVADA 89149
(702) 384-7000

ALVERSON TAYLOR & SANDERS
KURT R. BONDS, ESQ.
Nevada Bar #6228
TREVOR R. WAITE, ESQ.
Nevada Bar #13779
6605 GRAND MONTECITO PARKWAY
SUITE 200
LAS VEGAS, NEVADA 89149
efile@alversontaylor.com
(702) 384-7000
Attorneys for Father/Respondent
Adoptive Mother/Respondent

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

*

IN RE THE CUSTODY VISITATION OF)
JEREMIAH BLOUNT (DOB 1-19-2010);)
KAYDI BLOUNT (DOB 2-19-2013)
Minor Children) CASE NO.: D-20-605933-F
PAULA BLOUNT) DEPT. NO.: F
Grandmother/Petitioner,)
v.)
JUSTIN BLOUNT,)
GRETCHEN WHATONAME,)
Father/Respondent.)
v.)
STEPHANIE BLOUNT,)
Adoptive Mother/Respondent)

On March 18, 2020 Petitioner PAULA BLOUNT, by and through her undersigned counsel of record, filed her Registration of Foreign Custody Orders. Opposition to the Registration of Foreign Custody Order were by Father and Adoptive Mother, both Respondents to the case. Father's Opposition to the registration was filed on April 30, 2020 and a motion to

1 invalidate the Foreign Custody Order was on August 10, 2020. This Court, having reviewed and
2 examined the papers and pleadings on file herein, and good cause appearing, hereby enters the
3 following Findings of Fact and Order as follows:

4 **THE COURT FINDS:**

5 1. This Court had a hearing on this matter on October 20, 2020 where this Court
6 heard argument and took the matter under advisement.

7 2. That the grandmother, Pamela Blount domesticated a Foreign Judgment on March
8 18, 2020 with this Court. Petitioner is seeking full faith and credit from the Grandparent Custody
9 and Visitation Order filed on January 20, 2020 from the Tribal Courts of Hualapai Tribe, Peach
10 Springs, State of Arizona.

11 3. The Respondent father objects to the requests.

12 4. Several filings were made on the issues that the court has read in conjunction with
13 the related cases in this matter.

14 5. Throughout this action the parties have cited to ICWA, The Indian Child Welfare
15 Act.

16 6. This is not an ICWA issue because this is not the type of proceeding governed by
17 ICWA.

18 7. 25 U.S.C sect 1911(1) (2012) vests tribes with exclusive jurisdiction over Indian
19 child custody proceedings in certain situations.

20 8. 25 U.S.C sect 1903 (1) (2012) lists the child custody proceedings that fall under
21 ICWA.

22 9. The related case, D-18-571209-O, went through appellate review and the
23 Supreme Court of Nevada has weighed in on this case.

24 10. That decision was filed on September 16, 2019.

1 11. The Supreme court found that the UCCJEA was applicable in grandparent
2 visitation cases. The decision goes on to read that the Tribal Court never relinquished
3 jurisdiction over custody. Therefore, the tribal court still has exclusive continuing jurisdiction in
4 this case.

5 12. While this Court did grant a stepparent adoption in 2019, that proceeding did not
6 divest the tribal court of UCCJEA jurisdiction over these children.

7 13. UCCJEA proceedings were never held and the Tribal Courts of Hualapai Tribe,
8 Peach Springs, State of Arizona never relinquished jurisdiction to this court.

9 14. Therefore this COURT FINDS that the Tribal Courts of Hualapai Tribe, Peach
10 Springs, State of Arizona still has continuing exclusive jurisdiction in this case and the
11 grandmother, Pamela Blount domesticated a Foreign Judgment on March 18, 2020 with this
12 Court wherein she asks for full faith and credit.

13 15. Petitioner properly lodged her request for grandparent visitation prior to the
14 execution of the Decree of adoption when she commenced case D-18-571209-O, pursuant to
15 *Bopp v Lino* 110 Nev. 1246 (1994).

16 16. The father's opposition notes several defects about the tribal proceedings and asks
17 this court to invalidate the Tribal Court's orders. However, those defects are not for this court to
18 weigh in on and the father may consider appealing the Court's decision.

19 Based on the above, **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that the
20 orders from the Tribal Courts of Hualapai Tribe, Peach Springs, State of Arizona shall be given
21 full faith and credit.

1 ///

2 **IT IS FURTHER ORDERED** that both sides shall bear their own fees and costs.

3 **IT IS SO ORDERED.**

4 DATED this ____ day of _____, 2020.

Dated this 10th day of December, 2020


DISTRICT COURT JUDGE

8 Submitted by:

E38 66A 75C9 3B0D
Rena G. Hughes
District Court Judge

9 ALVERSON TAYLOR & SANDERS

10 

11 KURT R. BONDS, ESQ.

12 Nevada Bar #6228

13 TREVOR R. WAITE, ESQ.

14 Nevada Bar #13779

15 6605 GRAND MONTECITO PARKWAY

16 SUITE 200

17 LAS VEGAS, NEVADA 89149

18 efile@alversontaylor.com

19 (702) 384-7000

20 Attorneys for Father/Respondent

21 Adoptive Mother/Respondent

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Paula Blount, Plaintiff.

CASE NO: D-20-605933-F

7 vs.

DEPT. NO. Department J

8 Justin Blount, Defendant.
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District
12 Court. The foregoing Order was served via the court's electronic eFile system to all
13 recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 12/10/2020

15 Trevor Creel

trevor@willicklawgroup.com

16 Marshal Willick

marshal@willicklawgroup.com

17 Reception Reception

email@willicklawgroup.com

18 Victoria Javiel

victoria@willicklawgroup.com

19 Copy Room

efile@alversontaylor.com

20 Trevor Waite

twaite@alversontaylor.com

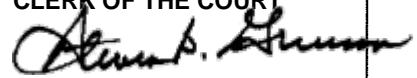
21 Kurt Bonds

kbonds@alversontaylor.com

22 Justin Blount

justincblount1@gmail.com

EXHIBIT W



PET
WILLICK LAW GROUP
MARSHAL S. WILLICK, ESQ.
Nevada Bar No. 2515
3591 E. Bonanza Road, Suite 200
Las Vegas, NV 89110-2101
Phone (702) 438-4100; Fax (702) 438-5311
email@willicklawgroup.com
Attorney for Petitioner

CASE NO: D-20-605933-F
Department: To be determined

**DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA**

In re the Custody/Visitation of
JEREMIAH BLOUNT (DOB: 1/19/2010)
KAYDI BLOUNT (DOB: 2/19/2013)

CASE NO:
DEPT. NO:

Minor Children,

PAULA BLOUNT,

Grandmother/Petitioner,

DATE OF HEARING: N/A
TIME OF HEARING: N/A

vs.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,

Parent(s)/Respondents.

REGISTRATION OF FOREIGN CUSTODY ORDERS

TO: STEVEN D. GRIERSON, Clerk of the Eighth Judicial District Court, Family Division, Clark County, Nevada

Petitioner, Paula Blount, by and through her attorneys, the WILLICK LAW GROUP, and pursuant to NRS 130.605 and NRS 125A.405 to 125A.585, inclusive, requests that the attached certified copies of the *Grandparent Custody and Visitation Order*, filed January 30, 2020 (Exhibit "A"), and the *Minute Order*, filed May 28, 2019 (Exhibit "B"), in Case No. 2019-CC-004, in the Tribal Courts of the Hualapai Tribe, Peach Springs, State of Arizona, be filed and given full faith and credit by the Eighth Judicial District Court of the State of Nevada for enforcement, and that in the

1 interest of equity and economy, said *Orders* be domesticated and accepted by the
2 Eighth Judicial District Court.¹
3

4 **I. STATEMENT OF FACTS**

5 A. Petitioner is filing this *Registration* to register the existing orders
6 entered in the Tribal Courts of the Hualapai Tribe, Peach Springs, State
7 of Arizona.

8 B. There are two minor children at issue in these proceedings, namely,
9 Jeremiah Blount, born January 19, 2010, and Kaydi Blount, born
10 February 19, 2013.

11 C. Petitioner, by and through her Counsel, is submitting a *Declaration in*
12 *Support of Registration of Foreign Orders* contemporaneously with this
13 filing.

14 D. There have been no modifications to the *Orders* referenced above.

15 **DATED** this 18th day of March, 2020.

16 Respectfully Submitted By:
17 WILICK LAW GROUP

18 

19 MARSHAL S. WILICK, ESQ.
20 Nevada Bar No. 2515
21 TREVOR M. CREEL, ESQ.
22 Nevada Bar No. 11943
23 3591 E. Bonanza, Suite 200
24 Las Vegas, Nevada 89110-2101
25 (702) 438-4100 Fax (702) 438-5311
26 Attorneys for Petitioner

27 ¹ One additional copy of each *Order* identified above is included with the certified copies as
28 required by NRS 125A.465.

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the WILLICK LAW GROUP and that on this 18th day of March, 2020, I caused the above and foregoing document to be served as follows:

- ☐ Pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D) and Administrative Order 14-2 captioned "In the Administrative Matter of Mandatory Electronic Service in the Eighth Judicial District Court," by mandatory electronic service through the Eighth Judicial District Court's electronic filing system.
- ☒ By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada.
- ☐ Pursuant to EDCR 7.26, to be sent via facsimile, 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 address, email address, and/or facsimile number indicated below:

Mr. Justin Blount
100 N. Wallace Drive Bldg 12 #156
Las Vegas, Nevada 89107
Respondent in Proper Person

Mr. Justin Blount
P.O. Box 1754
Las Vegas, Nevada 89125
Respondent in Proper Person

Ms. Gretchen Whatoname
c/o Candace Fox
2364 Wiki Way
Camp Verde, Arizona 86322
Counsel for Respondent


An Employee of the WILLICK LAW GROUP

P:\wp19\BLOUNT,PDRAFTS\00427562.WPD/vj

EXHIBIT “A”

EXHIBIT “A”

EXHIBIT “A”

ENTERED

JAN 30 2020

HUALAPAI TRIBAL COURT
PEACH SPRINGS, AZ

HUALAPAI TRIBAL COURT
P.O. Box #275

960 RODEO WAY

PEACH SPRINGS AZ 86434

PHONE: 928.769.2338

FAX: 928.769.2736

[HTTP://HUALAPAI-NSN.GOV/GOVERNMENT/TRIBAL-COURT/](http://hualapai-nsn.gov/government/tribal-court/)

IN THE TRIBAL COURTS OF THE HUALAPAI TRIBE
PEACH SPRINGS, STATE OF ARIZONA

In re the Custody/Visitation of

No. 2019-CC-004

JEREMIAH BLOUNT (DOB: 1/19/2010)

KAYDI BLOUNT (DOB: 2/19/2013)

Minor Children,

PAULA BLOUNT,

Grandmother/Petitioner,

vs.

JUSTIN BLOUNT,

Father/Respondent.

GRANDPARENT CUSTODY AND VISITATION
ORDER

(Hon. Kaniatarisio Jesse Gilbert)

A Motions Hearing was conducted on January 30, 2020, at 0830hrs. The presiding judge is Hon. Kaniatarisio Jesse Gilbert (for Hon. Rudy Clark Jr.); clerk is Tawnya Shongo. A recording of the proceedings is made in lieu of a court reporter. The Petitioner is present and is represented by Advocate Candace Fox; Respondent is NOT present, nor is Respondent's counsel of record - Trevor Waite of the firm of Alverson, Taylor & Sanders (Las Vegas, NV). *The Petitioner confirmed their address as PO Box #6856, Kingman AZ 86402/3834 E. Lass Avenue, Kingman AZ 86409.*

This Court has exercised jurisdiction over these children, who are enrolled members of the Hualapai Tribe, since the original petition for custody was filed by the children's mother on February 26, 2019. The Petition noted child dependency proceedings occurring in the state courts of Nevada. This Court has since continued to exercise jurisdiction over these children.

1 On December 9, 2019, the Petitioner filed a Petition for Grandparents Visitation Rights
2 pursuant to Chapter 20 of the Hualapai Law & Order Code. The matter was set for a Motion
3 Hearing, and Notice was e-mailed to the Respondent's counsel of record on December 30, 2019, at
4 1549hrs. The Clerk reports that there has been no returned-e-mail as undeliverable. The Court
5 does note, however, that there are errors in the Notice, specifically the caption is mistakenly
6 captioned as "Waite, Trevor v. Blount, Justin/Whatoname, Gretchen" and the date on the Notice is
7 listed as February 26, 2019. It does, however, give notice of a Motion Hearing on today's date at
8 0900hrs, and Mr. Waite could have contacted the Court to seek clarification.

9 "If the defendant fails to appear at any pre-trial proceeding or at the trial of a civil
10 matter...without cause, judgment may be entered for the plaintiff by default." Hual.Civ.P.C. §
11 4.13(A)(2). This matter was set for 0900hrs. It was initially called at approximately 0903hrs. As is
12 the standard practice of this Court, the absent party was given a fifteen (15) minute courtesy period
13 to arrive in a substantive hearing. At 0915hrs, the Court noted that the Respondent had still not
14 appeared and entertained motions. Ms. Fox moved for default judgment, which was granted, and
15 the terms requested in the Petition shall be awarded. The Respondent may appeal this decision by
16 exercising his rights under Chapter 10 of the Hualapai Law & Order Code within thirty (30) days of
17 the date of this Order.

18 *The Court noted that since this is a Tribal Court Order, that in order to ensure it's*
19 *enforceability in the State of Nevada, then the Petitioner may wish to domesticate this*
20 *Order in Nevada.*

21 **THEREFORE, IT IS HEREBY ORDERED that:**

- 22 1. This Court has jurisdiction over this child custody proceeding because the child is an
23 enrolled member of the Hualapai Tribe or is eligible for membership, Hual.Dom.Rel.C. §
24 12.29(A)(1), Hual.Grandparents.Rts.C. § 20.4(A)(a);
- 25 2. The Petitioner's Motion is hereby GRANTED BY DEFAULT, Hual.Civ.P.C. § 4.13(A)(2),
Hual.Grandparents.Rts.C. § 20.9;
3. The Respondent (Justin Blount) is awarded Joint-Legal and Joint-Physical custody of the
following minor children:
 - a. Jeremiah Blount (DOB: 1/19/2010);
 - b. Kaydi Blount (DOB: 2/19/2013);
4. The Petitioner, Paula Blount, is awarded Joint-Legal and Joint-Physical custody of these
same minor children for the periods during which custody and visitation is awarded;

1 5. Grandparent Custody and Visitation Schedule: The Petitioner is awarded custody and
2 visitation time with these children under the following terms and conditions, and in the
3 terms stated:

4 a. Every other weekend, beginning on Fridays at 1600hrs (Nevada Time) and ending
5 on Sundays at 1800hrs (Nevada Time), starting on Friday, February 7, 2020, and
6 alternating every other weekend thereafter;

7 b. The Months of June and July in every year, beginning on June 1, at 1700hrs (Nevada
8 Time) and ending on July 31, at 1800hrs (Nevada Time);

9 c. Christmas breaks in every even-numbered year, beginning on December 24, Even-
10 Year, at 1700hrs (Nevada Time) and ending on January 3, Odd-Year, at 1800hrs
11 (Nevada Time);

12 d. Telephonic Visitation: The Petitioner is awarded telephonic visitation with the
13 children on:

14 i. Every Wednesday, at 1800hrs (Nevada Time); and

15 ii. Sundays when the Petitioner does not have custody/visitation with the
16 children, at 1500hrs (Nevada Time);

17 iii. The telephone calls shall not be monitored or conducted on speakerphone;

18 iv. The Petitioner shall be responsible for making the phone calls to the children
19 and bear the costs;

20 v. During June and July when the children are with the Petitioner, the
21 Respondent (Justin Blount) shall have reciprocal telephonic visitation rights
22 under the same terms and conditions outlined above;

23 e. Pick Up & Drop-Off: The Petitioner, Paula Blount, shall be responsible for picking
24 up the children and returning the children to their father pursuant to the visitation
25 schedule outlined above, and bear the costs of travel;

f. Visitation Location: The Petitioner, Paula Blount, may exercise her visitation with
the children at her residence at 3834 E. Lass Avenue, Kingman, Arizona, 86409;

i. If the Petitioner intends to spend significant visitation time (i.e., overnight)
with the children in some other location, then the Petitioner shall ensure that
the Respondent (Justin Blount) is aware of the location and has the ability to
communicate with the Petitioner during those periods;

1 g. Failure to abide by the terms of this Order may result in an Order to Show Cause
2 Hearing and if found in contempt of court, the result may be imprisonment for a
3 period not to exceed 30 days, a fine of up to \$500.00, or both, Hual.Civ.Contempt.C.
4 § 8.1, § 8.2;

5 6. As this award was granted by Default Judgment, the Respondent maintains his right to
6 appeal this Order to the Hualapai Court of Appeals by filing a Notice of Appeal within thirty
7 (30) days of the date of this Order, Hual.Ct.App.P.C. § 10.3, § 10.4;

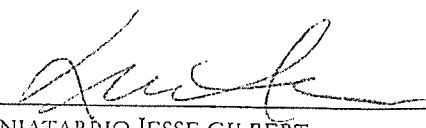
8 7. No Badmouthing: Both Parties are ordered not to badmouth the other party to the Minor
9 Children at all times;

10 8. Mutual Modification: this Order may be modified by mutual agreement between the Parties;

11 9. The Parties are advised that "[n]o motion to modify a custody decree may be made earlier
12 than one year after its date, unless the Court permits it to be made on the basis of affidavits
13 that there is reason to believe the child's present environment may endanger his physical,
14 mental, or emotional health, safety or welfare, Hual.Dom.Rel.C. § 12.31(B).

15 ORDERED on this 30th day of January, 2020.

16 HUALAPAI TRIBE
17 TRIBAL COURT

18 
19 HON. KANIATARCIO JESSE GILBERT

20 Copies of the foregoing mailed/delivered this date to:

21 JB Clerk of the Court (Original)
22 ✓ Candace Fox – 2364 Wiki Way, Camp Verde AZ 86322.
23 ✓ Paula Blount – PO Box #6856, Kingman AZ 86402 (Certified Copy).
24 ✓ Trevor Waite – Alverson, Taylor & Sanders, 6605 Grand Montecito Parkway, Suite 200, Las Vegas NV 89149.
25 ✓ Justin Blount – 100 N. Wallace Dr., Bldg 12 #156, Las Vegas NV 89107.

By: Juanita Shongu

I hereby certify that this is
a true and correct copy of the
instrument on file in the court
of the Hualapai Tribe.

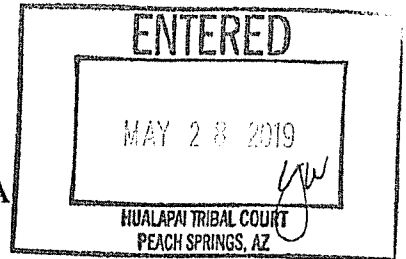
Juanita Shongu
Court Clerk
Hualapai Tribal Court

EXHIBIT “B”

EXHIBIT “B”

EXHIBIT “B”

IN THE HUALAPAI JUVENILE COURT
HUALAPAI INDIAN RESERVATION, ARIZONA



In the matter of:

Jeremiah C. Blount D.O.B 1/19/10

Kaydi R. Blount D.O.B 2/19/13

Case No.: 2019-CC-004

MINUTE ORDER

Parent(s),

The following proceeding or action occurred on the 28th day of May, 2019, A.D. at 02:00 PM in this Court:

✓ Other Adjudicatory Hearing

Persons present were:

✓ Plaintiff/Petitioner WHATONAME, GRETNA
✓ Plaintiff's Counsel FOX, CANDACE
NP Parent(s): BLOUNT, JUSTIN;
NP Defense's Counsel Trevor Waite
Other

Evidence/Action: THE PETITIONER IS PRESENT WITH HER COUNSEL CANDACE FOX, THE RESPONDENT IS NOT PRESENT AND HIS ATTORNEY IS NOT PRESENT IN COURT. THE COURT DID ISSUE A ORDER TO SHOW CAUSE AGAINST THE RESPONDENT FOR FAILING TO COMPLY WITH ORDER OF THE COURT ENTERED ON MAY 8, 2019.

The Court found and Ordered: THE COURT SHALL ENTER A DEFAULT JUDGMENT AND ORDERS THE PETITIONER IS GRANTED CUSTODY OF THE MINOR CHILDREN. THE COURT SHALL VACATE THE ORDER TO SHOW CAUSE AGAINST THE RESPONDENT. THE RESPONDENT SHALL RETURN THE CHILDREN TO THE PETITIONER.

Hearing/Trial is CONTINUED.

Complaint/Petition is DISMISSED with prejudice/without prejudice

The Court further ordered all parties and counsel to appear before the Court for

Date: May 28, 2019

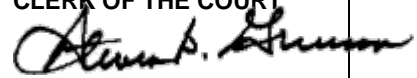
Tribal Court Judge

I certify that I distributed copies to: ✓ Plaintiff ✓ Plaintiff's Counsel Respondent q Respondent's Counsel q
Other: on May 28, 2019 By Revised November 2010

I hereby certify that this is
a true and correct copy of the
instrument on file in the court
of the Hualapai Tribe.

Court Clerk
Hualapai Tribal Court

EXHIBIT X



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
(702) 384-7000
Attorneys for Father/Respondent

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

IN RE THE CUSTODY VISITATION OF)
JEREMIAH BLOUNT (DOB 1-19-2010);)
KAYDI BLOUNT (DOB 2-19-2013)
Minor Children)
PAULA BLOUNT)
Grandmother/Petitioner,)
v.)
JUSTIN BLOUNT,)
GRETCHEN WHATONAME,)
Father/Respondent.)

CASE NO.: D-20-605933-F

DEPT. NO.: F

NOTICE OF APPEAL

PLEASE TAKE NOTICE that Respondent, Justin Blount, by and through his attorneys of record, the law office of Alverson Taylor & Sanders, hereby appeals from the following order and/or judgments:

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

///

///

///

2. Any and all orders made appealable thereby.

DATED this 9th 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

(702) 384-7000

Attorneys for Father/Respondent

CERTIFICATE OF SERVICE

I certify that on November 9, 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 ~

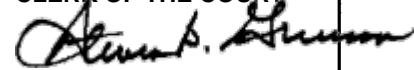
ALVERSON TAYLOR & SANDERS



An Employee of AT&S

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

EXHIBIT Y



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
(702) 384-7000
Attorneys for Respondent Adoptive Mother

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

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

Minor Children

CASE NO.: D-20-605933-F

DEPT. NO.: F

PAULA BLOUNT
Grandmother/Petitioner,
v.

NOTICE OF APPEAL

JUSTIN BLOUNT,
GRETCHEN WHATONAME,
Father/Respondent.
v.

STEPHANIE BLOUNT,

Adoptive Mother/Respondent

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

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

KRB/26109
APP 0122

ALVERSON TAYLOR & SANDERS
LAWYERS
6605 GRAND MONTECITO PKWY STE 200
LAS VEGAS, NV 89149
(702) 384-7000

2. Any and all orders made appealable thereby.

DATED this 12th 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

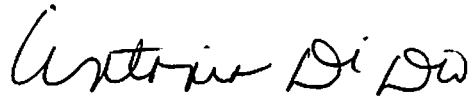
(702) 384-7000

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

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