

IN THE COURTS OF APPEAL OF THE STATE OF NEVADA

* * * * *

JUSTIN CRAIG BLOUNT; AND
STEPHANIE BLOUNT,

Appellants

vs.

PAULA BLOUNT,

Respondents.

Electronically Filed
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DC NO: DE20-0593 AF Brown
Elizabeth A. Brown
Clerk of Supreme Court

**RESPONDENT'S
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DATE ORDER
VOLUME V**

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EXHIBIT “CCC”

EXHIBIT “CCC”

EXHIBIT “CCC”

ORIGINAL

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

FILED

MAR 16 2021

Sharon A. Hoffman
CLERK OF COURT

PAULA BLOUNT,) CASE NO. D-20-605933-F
Plaintiff,) DEPT. J
vs.) NV SUPREME CT. APPEAL NO. 82095
JUSTIN BLOUNT,)
Defendant.)

FINAL BILLING FOR TRANSCRIPTS

The office of Transcript Video Services filed transcripts for Daniel Mann, Esq., on March 16, 2021 for the following proceedings in the above-captioned case:

OCTOBER 20, 2020

Original transcript and one copy were requested.

The transcript total is 18 pages, for a final cost of \$94.24. A deposit in the amount of \$160.00 was received on March 11, 2021. A refund of \$65.76 will be process to the credit card provide directly to **Verbatim Reporting and Transcription.**

DATED this 16th day of March, 2021.

Maria Balagtas

Maria Balagtas, Legal Office Assistant II
Transcription Video Services

Balance of Paid in Full Check # _____ CC# 21-497 CASH _____ CLERK _____

Received by: _____ this _____ day of _____, 2021.

ITEMS LEFT BEYOND NINETY DAYS ARE SUBJECT TO DISPOSAL WITHOUT REFUND.
COUNTY RETENTION POLICY APPROVED BY INTERNAL AUDIT.

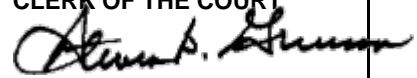
EIGHTH JUDICIAL DISTRICT COURT - TRANSCRIPT VIDEO SERVICES
601 N. Pecos Road, Las Vegas, Nevada 89101 (702) 455-4977

000889

EXHIBIT “DDD”

EXHIBIT “DDD”

EXHIBIT “DDD”



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**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,

vs.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,

Parent(s)/Respondents.

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

DATE OF HEARING:
TIME OF HEARING:

ORAL ARGUMENT

Yes **X** No

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 FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING DATE.

**PETITIONER, PAULA BLOUNT'S MOTION FOR AN ORDER TO
SHOW CAUSE AS TO WHY RESPONDENT, JUSTIN BLOUNT,
SHOULD NOT BE HELD IN CONTEMPT, FOR MONETARY
SANCTIONS, AND FOR ATTORNEY'S FEES AND COSTS**

I. INTRODUCTION

Petitioner, Paula Blount, by and through her attorneys of the WILICK LAW GROUP, hereby submits the following *Motion* requesting an *Order to Show Cause*

1 against Respondent, Justin Blount, for his willful failure to comply with this Court's
2 *Order* filed December 10, 2020, as well as its *Order From the January 12, 2021,*
3 *Hearing*, filed March 9, 2021.

4 As will be detailed below, and verified by way of Paula's *Declaration*, Justin
5 has willfully refused to comply with the orders from the Tribal Courts of Hualapai
6 Tribe, Peach Springs, State of Arizona, that have been registered with this Court and
7 given full faith and credit. Not to mention the fact that it appears the children
8 remaining with Justin is detrimental to their health and well-being, making it
9 imperative for the Court to return these children to the only stable home they've ever
10 known. Accordingly, Paula requests the Court issue the following orders:

- 11 1. Issuing an *Order to Show Cause* as to why Justin should not be held in
12 contempt for his clear violations of the *Order* filed December 10, 2020,
13 as well as the *Order From the January 12, 2021, Hearing*, filed March
14 9, 2021.
- 15 2. Holding Justin in contempt for his violations of the *Order* filed
16 December 10, 2020, as well as the *Order From the January 12, 2021,*
17 *Hearing*, filed March 9, 2021.
- 18 3. Monetarily sanctioning Justin for each of his violations of the *Order*
19 filed December 10, 2020, as well as the *Order From the January 12,*
20 *2021, Hearing*, filed March 9, 2021.
- 21 4. Awarding Paula the entirety of her attorney's fees and costs.
- 22 5. For such other and further relief as the Court deems just and proper.

23 **POINTS AND AUTHORITIES**

24 **II. FACTS**

25 As a detailed rendition of the facts and circumstances underlying this case has
26 been supplied to the Court by way of Paula's *Reply* filed July 9, 2020, and her
27
28

1 *Opposition* filed September 1, 2020, only a limited factual background will be
2 supplied here.

3 Petitioner, Paula Blount, is the paternal grandmother to the subject minors
4 referenced above, i.e., Jeremiah Blount, born January 19, 2010, and Kaydi Blount,
5 born February 19, 2013.¹

6 Justin Blount is the Petitioner's son, and Gretchen Whatoname was the minor
7 children's biological mother. Gretchen passed away on December 27, 2017.

8 Prior to Justin cutting off contact between the minor children and their
9 grandmother, Paula regularly cared for the minor children and was their primary
10 caregiver for many years. Her and the children obviously developed a bond over
11 those many years and she has regularly sought contact with the children over the past
12 three years through multiple outlets to facilitate that relationship.

13 After the Clark County District Court (Family Division) dismissed her initial
14 *Petition* for grandparent visitation (and her appeal was ultimately denied) on the
15 premise that the Hualapai Tribal Court in Arizona maintained continuing exclusive
16 jurisdiction, Paula filed a *Petition* on December 9, 2019, in the Hualapai Tribal Court
17 seeking grandparent visitation. The *Notice of Hearing* relating to Paula's *Petition*
18 was provided to all interested parties.

19 Paula then appeared before the Tribal Court on January 30, 2020, wherein it
20 issued a *Grandparent Custody and Visitation Order*. In that *Order*, the Tribal Court
21 found and ordered as follows:

22 This Court has exercised jurisdiction over these children, who are
23 enrolled members of the Hualapai Tribe, since the original petition for custody
24 was filed by the children's mother on February 26, 201[7]. . . This Court has
since continued to exercise jurisdiction over these children.²

25 On December 9, 2019, the Petitioner filed a Petition for Grandparents
Visitation Rights pursuant to Chapter 20 of the Hualapai Law & Order Code

26
27 ¹ Both Jeremiah and Kaydi are registered members of the Hualapai Tribe, which is a federally
28 recognized Indian Tribe located on the Hualapai Indian Reservation in Northwestern Arizona.

² *Grandparent Custody and Visitation Order*, filed January 20, 2020, page 1, lines 23-25.

1 The matter was set for a Motion Hearing, and Notice was e-mailed to the
2 Respondent's counsel of record on December 30, 2019, at 1549 hrs. The Clerk
3 reports that there has been no returned e-mail as undeliverable. The Court
4 does not, however, that there are errors in the Notice, specifically the caption
5 is mistakenly captioned as "Waite, Trevor v. Blount, Justin/Whatoname,
6 Gretchen" and the date on the Notice is listed as February 26, 2019. It does
7 however, give notice of a Motion Hearing on today's date at 0900 hrs, and Mr.
8 Waite could have contacted the Court to seek clarification.³

9
10 5. Grandparent Custody and Visitation Schedule: The Petitioner is
11 awarded custody and visitation time with these children under the
12 following terms and conditions, and in the terms stated:

- 13 a. Every other weekend, beginning on Fridays at 1600hrs (Nevada
14 Time) and ending on Sundays at 1800hrs (Nevada Time),
15 starting on Friday, February 7, 2020, and alternating every other
16 weekend thereafter;
- 17 b. The Months of June and July in every year, beginning on June
18 1, at 1700hrs (Nevada Time) and ending on July 31, at 1800hrs
19 (Nevada Time);
- 20 c. Christmas breaks in every even-numbered year, beginning on
21 December 24, Even Year, at 1700hrs (Nevada Time) and ending
22 on January 3, Odd-Year, at 1800hrs (Nevada Time);
- 23 d. Telephonic Visitation: The Petitioner is awarded telephonic
24 visitation with the children on:
- 25 i. Every Wednesday, at 1800hrs (Nevada Time); and
- 26 ii. Sundays when the Petitioner does not have
27 custody/visitation with the children, at 1500hrs (Nevada
28 Time);
- 29 iii. The telephone calls shall not be monitored or conducted
30 on speakerphone;
- 31 iv. The Petitioner shall be responsible for making the phone
32 calls to the children and bear the costs;
- 33 v. During June and July when the children are with the
34 Petitioner, the Respondent (Justin Blount) shall have
35 reciprocal telephonic visitation rights under the same
36 terms and conditions outlined above;⁴

37 As a result of those findings and orders, the Tribal Court awarded Paula joint
38 legal and physical custody of the minor children pursuant to a specific schedule to

39 ³*Id.*, page 2, lines 1-7.

40 ⁴*Id.*, page 3, lines 1-18.

1 which Justin has failed to even acknowledge, let alone follow. So as to pursue
2 enforcement of the clear and unambiguous custody orders issued by the Tribal Court,
3 Paula filed her *Registration of Foreign Custody Orders* on March 18, 2020, wherein
4 she attached, as Exhibit “A”, the *Grandparent Custody and Visitation Order*, filed
5 January 30, 2020.

6 Justin, through counsel, accepted service of Paula’s *Registration* on April 6,
7 2020. Justin filed an *Opposition* to Paula’s *Registration* on April 30, 2020, and failed
8 to submit a request for a hearing at the time of his *Opposition* in violation of NRS
9 125A.465(6). Paula filed her *Reply* to Justin’s *Opposition* on July 9, 2020.

10 On or around August 10, 2020, Stephanie and Justin filed a document entitled
11 *Motion to Invalidate*. The same was purportedly served by mail on August 13, 2020,
12 although the *Proof of Service* was filed on August 20, 2020, and the undersigned did
13 not receive a copy of their *Motion* until August 18, 2020.

14 Paula filed an *Opposition and Countermotion* on September 1, 2020, and the
15 parties subsequently appeared before the Court on October 20, 2020. After hearing
16 argument from the parties, the Court took the matter under advisement and issued a
17 written decision on November 2, 2020. By way of that *Minute Order*, the Court
18 correctly concluded that the Hualapai Tribal Court never relinquished UCCJEA
19 jurisdiction to Nevada, that the Hualapai Tribal Court still has continuing exclusive
20 jurisdiction, and that the orders from the Hualapai Tribal Court must be given full
21 faith and credit.

22 In an ongoing effort to further restrict Paula’s ability to communicate with her
23 grandchildren, Justin filed a *Notice of Appeal* and a *Motion to Stay* within 10 days of
24 the Court’s determination. Since the initiation of this case, Justin has refused to abide
25 by the Court’s orders and all of Paula’s court-ordered visitation has been denied since
26 February 7, 2020. This necessarily includes all of the following weekends and
27 visitation time:

- 28 • February 7-9, 2020 (two days)

- February 21-23, 2020 (two days)
- March 6-8, 2020 (two days)
- March 20-22, 2020 (two days)
- April 3-5, 2020 (two days)
- April 17-19, 2020 (two days)
- May 1-3, 2020 (two days)
- May 15-17, 2020 (two days)
- May 29-31, 2020 (two days)
- June 1 - July 31, 2020 (61 days)
- August 7-9, 2020 (two days)
- August 21-23, 2020 (two days)
- September 4-6, 2020 (two days)
- September 18-20, 2020 (two days)
- October 2-4, 2020 (two days)
- October 16-18, 2020 (two days)
- October 30 - November 1, 2020 (two days)
- November 13-15, 2020 (two days)
- November 27-29, 2020 (two days)
- December 11-13, 2020 (two days)
- December 24, 2020 - January 3, 2021 (10 days)
- January 8-10, 2021 (two days)
- January 22-24, 2021 (two days)
- February 5-7, 2021 (two days)
- February 19-21, 2021 (two days)
- March 5-7, 2021 (two days)

In total, Justin has willfully violated the terms of the Court's Orders, and that doesn't account for his refusal to abide by all of the telephonic visitation arrangements, ***119 times***. It is anticipated that Paula's weekend visitation for March

1 19th will also be denied, as will all other visits scheduled prior to the Court addressing
2 this filing.

3 This *Motion* follows.

4
5 **III. LEGAL ARGUMENT**

6 **A. Justin Should be Held in Contempt and Sanctioned Accordingly for**
7 **His Violations of the *Order* Filed December 10, 2020, and the *Order***
8 ***From the January 12, 2021, Hearing, Filed March 9, 2021***

9 NRS 22.010 provides in pertinent part:

10 The following acts or omissions shall be deemed contempts:

- 11 1. Disorderly, contemptuous or insolent behavior toward the judge
12 while the judge is holding court, or engaged in judicial duties at
13 chambers, or toward masters or arbitrators while sitting on a reference
14 or arbitration, or other judicial proceeding.
- 15 2. A breach of the peace, boisterous conduct or violent disturbance in
16 the presence of the court, or in its immediate vicinity, tending to
17 interrupt the due course of the trial or other judicial proceeding.
- 18 3. Disobedience or resistance to any lawful writ, order, rule or process
19 issued by the court or judge at chambers.

20 Further, NRS 22.100 dictates the penalties for contempt, as follows:

- 21 1. Upon the answer and evidence taken, the court or judge or jury, as
22 the case may be, shall determine whether the person proceeded against
23 is guilty of the contempt charged.
- 24 2. Except as otherwise provided in NRS 22.110, if a person is found
25 guilty of contempt, a fine may be imposed on him not exceeding \$500
26 or he may be imprisoned not exceeding 25 days, or both.
- 27 3. In addition to the penalties provided in subsection 2, if a person is
28 found guilty of contempt pursuant to subsection 3 of NRS 22.010, the
court may require the person pay to the party seeking to enforce the
writ, order, rule or process the reasonable expenses, including, without
limitation, attorneys fees, incurred by the party as a result of the
contempt.

In addition, EDCR 5.510 provides,

- (a) A motion [or countermotion] seeking an Order to Show Cause (OSC) for contempt must be accompanied by a detailed affidavit complying with NRS 22.030(2) that identifies the specific provisions, pages and lines of the existing order(s) alleged to have been violated, the acts or omissions constituting the alleged violation, any harm suffered or anticipated, and the

1 need for a contempt ruling, which should be filed and served as any other
2 motion.

3 (b) The party seeking the OSC shall submit an ex parte application for
4 issuance of the OSC to the court, accompanied by a copy of the filed motion
5 for OSC and a copy of the proposed OSC.

6 (c) Upon review of the motion and application, the court may:

- 7 (1) Deny the motion and vacate the hearing;
- 8 (2) Issue the requested OSC, to be heard at the motion
9 hearing;
- 10 (3) Reset the motion hearing to an earlier or later time; or
- 11 (4) Leave the hearing on calendar without issuing the OSC
12 so as to address issues raised in the motion at that time,
13 either resolving them or issuing the OSC at the hearing.

14 (d) If an OSC is issued in advance of the first hearing, the moving party
15 shall serve it and the application for OSC on the accused contemnor.

16 (e) At the first hearing after issuance of an OSC, the accused contemnor
17 may be held in contempt, or not, or the court may continue the hearing with
18 directions on the issue. At the first or any subsequent hearing after issuance of
19 an OSC, if the accused contemnor does not appear, a bench warrant may be
20 issued to secure attendance at a future hearing, or other relief may be ordered.

21 The unambiguous *Orders* of the Court filed December 10, 2020, and March 9,
22 2021, specifically provided that the orders from the Haulapai Tribal Court must be
23 given full faith and credit. Justin has willfully refused to abide by those Tribal Court
24 orders on at least 119 separate occasions and must be held in contempt.

25 In addition to being held in contempt, Justin should be monetarily sanctioned
26 in the amount of \$500 for each individual contempt (119 separate violations and
27 counting totaling a minimum of \$59,500), and made responsible for the entirety of
28 Paula's attorney's fees and costs.

Finally, and because of his utter refusal to comply with this Court's orders,
Justin should be imprisoned for at least 100 days, with the understanding that his time
can be commuted provided he actually complies with this Court's orders.

1 **B. Paula Should Receive an Award of Her Attorney’s Fees and Costs**

2 As this Court is aware, fees may be awarded to the prevailing party in a dispute
3 pursuant to NRS 18.010.⁵ Moreover, NRS 125A.535 provides that “[t]he court shall
4 award the prevailing party, including a state, necessary and reasonable expenses
5 incurred by or on behalf of the party, including costs, communication expenses,
6 attorney’s fees . . .”

7 In addition, attorney’s fees may be awarded in a contempt action pursuant to
8 NRS 22.100(3).

9 All that Paula is seeking is the enforcement of legitimate Court orders entered
10 by the only Court with jurisdiction to issue such orders. That Justin has vehemently
11 (and unsuccessfully) opposed the registration of those lawful orders, filed an appeal
12 for the sole purpose of delaying Paula’s contact with the children, and forced Paula
13 to respond to pursue this *Motion* just to gain some semblance of compliance with this
14 Court’s orders requires an additional award of fees and costs. Justin is one of those
15 rare litigants who believes that Court orders do not apply to him and that he is free
16 to do whatever he wants; he should be disabused of that notion.

17 With specific reference to Family Law matters, the Court has adopted
18 “well-known basic elements,” which in addition to hourly time schedules kept by the
19 attorney, are to be considered in determining the reasonable value of an attorney’s
20 services qualities, commonly referred to as the *Brunzell*⁶ factors:

- 21 1. *The Qualities of the Advocate:* his ability, his training, education,
22 experience, professional standing and skill.
23 2. *The Character of the Work to Be Done:* its difficulty, its intricacy, its
24 importance, time and skill required, the responsibility imposed and the

25 ⁵ See *Love v. Love*, 114 Nev. 572, 959 P.2d 523 (1998); *Wright v. Osburn*, 114 Nev. 1367,
26 970 P.2d 1071 (1998); *Halbrook v. Halbrook*, 114 Nev. 1455, 971 P.2d 1262 (1998); *Korbel v.*
27 *Korbel*, 101 Nev. 140, 696 P.2d 993 (1985); *Fletcher v. Fletcher*, 89 Nev. 540, 516 P.2d 103 (1973);
28 *Leeming v. Leeming*, 87 Nev. 530, 490 P.2d 342 (1971).

⁶ *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

1 prominence and character of the parties where they affect the
2 importance of the litigation.

3 3. *The Work Actually Performed by the Lawyer:* the skill, time and
4 attention given to the work.

5 4. *The Result:* whether the attorney was successful and what benefits were
6 derived.

7 Each of these factors should be given consideration, and no one element
8 should predominate or be given undue weight.⁷ Additional guidance is provided by
9 reviewing the “attorney’s fees” cases most often cited in Family Law.⁸

10 The *Brunzell* factors require counsel to make a representation as to the
11 “qualities of the advocate,” the character and difficulty of the work performed, and
12 the work actually performed by the attorney.

13 First, respectfully, we suggest that the supervising counsel is A/V rated, a
14 peer-reviewed and certified (and re-certified) Fellow of the American Academy of
15 Matrimonial Lawyers, and a Certified Specialist in Family Law.

16 Trevor M. Creel, Esq., the attorney primarily responsible for drafting this
17 *Reply*, has practiced exclusively in the field of family law for over ten years under the
18 direct tutelage of supervising counsel.

19 As to the “character and quality of the work performed,” we ask the Court to
20 find our work in this matter to have been adequate, both factually and legally; we
21 have diligently reviewed the applicable law, explored the relevant facts, and believe
22 that we have properly applied one to the other.

23 The fees charged by paralegal staff are reasonable, and compensable, as well.
24 The tasks performed by staff in this case were precisely those that were “some of the
25 work that the attorney would have to do anyway [performed] at substantially less cost

26 ⁷ *Miller v. Wilfong*, 121 Nev. 619, 119 P.3d 727 (2005).

27 ⁸ Discretionary Awards: Awards of fees are neither automatic nor compulsory, but within
28 the sound discretion of the Court, and evidence must support the request. *Fletcher v. Fletcher*, 89
Nev. 540, 516 P.2d 103 (1973); *Levy v. Levy*, 96 Nev. 902, 620 P.2d 860 (1980); *Hybarger v.*
Hybarger, 103 Nev. 255, 737 P.2d 889 (1987).

1 per hour.”⁹ As the Nevada Supreme Court reasoned, “the use of paralegals and other
2 nonattorney staff reduces litigation costs, so long as they are billed at a lower rate,”
3 so “reasonable attorney’s fees . . . includes charges for persons such as paralegals
4 and law clerks.”

5 Finally, we believe that we will be the prevailing party on this matter.

6 The work actually performed will be provided to the Court upon request by
7 way of a *Memorandum of Fees and Costs* (redacted as to confidential information),
8 consistent with the requirements under *Love*.¹⁰

9
10 **IV. CONCLUSION**

11 Based on the above, Paula respectfully requests the Court issue the following
12 orders:

- 13 1. Issuing an *Order to Show Cause* as to why Justin should not be held in
14 contempt for his clear violations of the *Order* filed December 10, 2020,
15 as well as the *Order From the January 12, 2021, Hearing*, filed March
16 9, 2021.
- 17 2. Holding Justin in contempt for his violations of the *Order* filed
18 December 10, 2020, as well as the *Order From the January 12, 2021,*
19 *Hearing*, filed March 9, 2021.
- 20 3. Monetarily sanctioning Justin for each of his violations of the *Order*
21 filed December 10, 2020, as well as the *Order From the January 12,*
22 *2021, Hearing*, filed March 9, 2021.
- 23 4. Awarding Paula the entirety of her attorney’s fees and costs.

24 *****

25 *****

26
27 ⁹ *LVMPD v. Yeghiazarian*, 129 Nev. 760, 312 P.3d 503 (2013) citing to *Missouri v. Jenkins*,
491 U.S. 274 (1989).

28 ¹⁰ *Love v. Love*, 114 Nev. 572, 959 P.2d 523 (1998).

1 5. For such other and further relief as the Court deems just and proper.

2 DATED this 15th day of March, 2021.

3 Respectfully Submitted By:
4 WILLICK LAW GROUP

5 */s/ Trevor M. Creel*

6 _____
7 MARSHAL S. WILLICK, ESQ.
8 Nevada Bar No. 2515
9 TREVOR M. CREEL, ESQ.
10 Nevada Bar No. 11943
11 3591 E. Bonanza, Suite 200
12 Las Vegas, Nevada 89110-2101
13 (702) 438-4100 Fax (702) 438-5311
14 Attorneys for Paula Blount

DECLARATION OF PAULA BLOUNT

1. I, Paula Blount, declare that I am competent to testify to the facts contained in this filing.

2. I have read the preceding filing, and it is true to the best of my knowledge, except those matters based on information and belief, and as to those matters, I believe them to be true. The factual averments contained in the preceding filing are incorporated herein as if set forth in full.

3. I am the paternal grandmother to the subject minors, Jeremiah Blount, born January 19, 2010, and Kaydi Blount, born February 19, 2013.¹¹

4. Justin Blount is my son, and Gretchen Whatoname was the minor children's biological mother. Gretchen passed away on December 27, 2017.

5. Prior to Justin cutting off contact between me and the minor children, I regularly cared for the minor children and was their primary caregiver for many years.

6. The children and I obviously developed a bond over those many years and I have regularly sought contact with the children over the past three years through multiple outlets to facilitate that relationship.

7. After the Clark County District Court (Family Division) dismissed my initial *Petition* for grandparent visitation (and my appeal was ultimately denied) on the premise that the Hualapai Tribal Court in Arizona maintained continuing exclusive jurisdiction, I filed a *Petition* on December 9, 2019, in the Hualapai Tribal Court seeking grandparent visitation. The *Notice of Hearing* relating to my *Petition* was provided to all interested parties.

8. I then appeared before the Tribal Court on January 30, 2020, wherein it issued a *Grandparent Custody and Visitation Order*. In that *Order*, the Tribal Court found and ordered as follows:

¹¹ Both Jeremiah and Kaydi are registered members of the Hualapai Tribe, which is a federally recognized Indian Tribe located on the Hualapai Indian Reservation in Northwestern Arizona.

1 This Court has exercised jurisdiction over these children, who are
2 enrolled members of the Hualapai Tribe, since the original petition for custody
3 was filed by the children's mother on February 26, 201[7]. . . This Court has
4 since continued to exercise jurisdiction over these children.¹²

5 On December 9, 2019, the Petitioner filed a Petition for Grandparents
6 Visitation Rights pursuant to Chapter 20 of the Hualapai Law & Order Code
7 The matter was set for a Motion Hearing, and Notice was e-mailed to the
8 Respondent's counsel of record on December 30, 2019, at 1549 hrs. The Clerk
9 reports that there has been no returned e-mail as undeliverable. The Court
10 does not, however, that there are errors in the Notice, specifically the caption
11 is mistakenly captioned as "Waite, Trevor v. Blount, Justin/Whatoname,
12 Gretchen" and the date on the Notice is listed as February 26, 2019. It does
13 however, give notice of a Motion Hearing on today's date at 0900 hrs, and Mr.
14 Waite could have contacted the Court to seek clarification.¹³

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

- 18 a. Every other weekend, beginning on Fridays at 1600hrs (Nevada
19 Time) and ending on Sundays at 1800hrs (Nevada Time),
20 starting on Friday, February 7, 2020, and alternating every other
21 weekend thereafter;
- 22 b. The Months of June and July in every year, beginning on June
23 1, at 1700hrs (Nevada Time) and ending on July 31, at 1800hrs
24 (Nevada Time);
- 25 c. Christmas breaks in every even-numbered year, beginning on
26 December 24, Even Year, at 1700hrs (Nevada Time) and ending
27 on January 3, Odd-Year, at 1800hrs (Nevada Time);
- 28 d. Telephonic Visitation: The Petitioner is awarded telephonic
visitation with the children on:
 - i. Every Wednesday, at 1800hrs (Nevada Time); and
 - ii. Sundays when the Petitioner does not have
custody/visitation with the children, at 1500hrs (Nevada
Time);
 - iii. The telephone calls shall not be monitored or conducted
on speakerphone;
 - iv. The Petitioner shall be responsible for making the phone
calls to the children and bear the costs;

26 ¹² *Grandparent Custody and Visitation Order*, filed January 20, 2020, page 1, lines 23-25.,
27 and registered with this Court by way of my *Registration of Foreign Custody Orders* filed March
28 18, 2020.

¹³ *Id.*, page 2, lines 1-7.

1 v. During June and July when the children are with the
2 Petitioner, the Respondent (Justin Blount) shall have
3 reciprocal telephonic visitation rights under the same
4 terms and conditions outlined above;¹⁴

5 9. As a result of those findings and orders, the Tribal Court awarded me
6 joint legal and physical custody of the minor children pursuant to a specific schedule
7 to which Justin has failed to even acknowledge, let alone follow.

8 10. So as to pursue enforcement of the clear and unambiguous custody
9 orders issued by the Tribal Court, I filed a *Registration of Foreign Custody Orders*
10 on March 18, 2020, wherein my counsel attached, as Exhibit “A”, the *Grandparent*
11 *Custody and Visitation Order*, filed January 30, 2020.

12 11. Justin, through counsel, accepted service of my *Registration* on April 6,
13 2020.

14 12. Justin filed an *Opposition* to my *Registration* on April 30, 2020, and
15 failed to submit a request for a hearing at the time of his *Opposition* in violation of
16 NRS 125A.465(6).

17 13. I filed my *Reply* to Justin’s *Opposition* on July 9, 2020.

18 14. On or around August 10, 2020, Stephanie and Justin filed a document
19 entitled *Motion to Invalidate*. The same was purportedly served by mail on August
20 13, 2020, although the *Proof of Service* was filed on August 20, 2020, and my
21 counsel did not receive a copy of their *Motion* until August 18, 2020.

22 15. I filed an *Opposition and Countermotion* on September 1, 2020, and the
23 parties subsequently appeared before the Court on October 20, 2020. After hearing
24 argument from the parties, the Court took the matter under advisement and issued a
25 written decision on November 2, 2020.

26 16. By way of that *Minute Order*, the Court correctly concluded that the
27 Hualapai Tribal Court never relinquished UCCJEA jurisdiction to Nevada, that the
28

¹⁴ *Id.*, page 3, lines 1-18.

1 Hualapai Tribal Court still has continuing exclusive jurisdiction, and ***that the orders***
2 ***from the Hualapai Tribal Court must be given full faith and credit.***

3 17. In an ongoing effort to further restrict my ability to communicate with
4 my grandchildren, Justin filed a *Notice of Appeal* and a *Motion to Stay* within 10 days
5 of the Court's determination.

6 18. Since the initiation of this case, Justin has refused to abide by the Court's
7 orders and ***all of my court-ordered visitation has been denied since February 7,***
8 ***2020.*** This necessarily includes all of the following weekends and visitation time:

- 9 • February 7-9, 2020 (two days)
- 10 • February 21-23, 2020 (two days)
- 11 • March 6-8, 2020 (two days)
- 12 • March 20-22, 2020 (two days)
- 13 • April 3-5, 2020 (two days)
- 14 • April 17-19, 2020 (two days)
- 15 • May 1-3, 2020 (two days)
- 16 • May 15-17, 2020 (two days)
- 17 • May 29-31, 2020 (two days)
- 18 • June 1 - July 31, 2020 (61 days)
- 19 • August 7-9, 2020 (two days)
- 20 • August 21-23, 2020 (two days)
- 21 • September 4-6, 2020 (two days)
- 22 • September 18-20, 2020 (two days)
- 23 • October 2-4, 2020 (two days)
- 24 • October 16-18, 2020 (two days)
- 25 • October 30 - November 1, 2020 (two days)
- 26 • November 13-15, 2020 (two days)
- 27 • November 27-29, 2020 (two days)
- 28 • December 11-13, 2020 (two days)

- December 24, 2020 - January 3, 2021 (10 days)
- January 8-10, 2021 (two days)
- January 22-24, 2021 (two days)
- February 5-7, 2021 (two days)
- February 19-21, 2021 (two days)
- March 5-7, 2021 (two days)

19. In total, Justin has willfully violated the terms of the Court's *Orders*, and that doesn't account for his refusal to abide by all of the telephonic visitation arrangements, **119 times**.

20. It is anticipated that my weekend visitation for March 19th will also be denied, as will all other visits scheduled prior to the Court addressing this filing.

21. Because Justin has failed to comply with the *Order* filed December 10, 2020, as well as the *Order From the January 12, 2021, Hearing*, filed March 9, 2021, it is necessary for this Court to hold him in contempt and sanction him accordingly.

22. The other factual averments contained in the preceding filing are incorporated herein as if set forth in full.

I declare under penalty of perjury under the laws of the State of Nevada (NRS 53.045 and 28 U.S.C. § 1746), that the foregoing is true and correct.

EXECUTED this 19th day of March, 2021.

/s/ Paula Blount
PAULA BLOUNT

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the WILICK LAW GROUP and that on this 19th day of March, 2021, I caused the foregoing document to be served as follows:

- [X] 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.

To the litigant(s) and attorney(s) listed below at the address, email address, and/or facsimile number indicated:

Trevor R. Waite, Esq.
Daniel Mann, Esq.
Alverson Taylor & Sanders
6605 Grand Montecito Parkway, Ste. 200
Las Vegas, Nevada 89149
Twaite@AlversonTaylor.com
Attorneys for Father/Respondent

Candice Fox
2364 Wiki Way
Camp Verde, Arizona 86322
Arizona Counsel for Petitioner, Paula Blount

Stephanie Blount
Justin Blount
PO Box 61521
Las Vegas, Nevada

/s/ *Victoria Javiel*

Employee of the WILICK LAW GROUP

P:\wp19\BLOUNT,P\DRAFTS\00487795.WPD

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

In re the Custody/Visitation of)
 Jeremiah Blount (DOB: 1/19/2020))
 Kaydi Blount (DOB: 2/19/2013)
)
 Minor Children)
 Paula Blount)
 Grandmother/Petitioner,)
 -v.-)
)
 Justin Blount, Gretchen Whatoname,)
 Parent(s)/Respondent)
 _____)

Case No. D-20-605933-FDepartment J

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

Notice: Motions and Oppositions filed after entry of a final order issued pursuant to NRS 125, 125B or 125C are subject to the reopen filing fee of \$25, unless specifically excluded by NRS 19.0312. Additionally, Motions and Oppositions filed in cases initiated by joint petition may be subject to an additional filing fee of \$129 or \$57 in accordance with Senate Bill 388 of the 2015 Legislative Session.

Step 1. Select either the \$25 or \$0 filing fee in the box below.

- ☒ **\$25** The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
 -Or-
☐ **\$0** The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
☐ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
☐ The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on _____.
☐ Other Excluded Motion (must specify) _____.

Step 2. Select the \$0, \$129 or \$57 filing fee in the box below.

- ☒ **\$0** The Motion/Opposition being filed with this form is **not** subject to the \$129 or the \$57 fee because:
☐ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
☒ The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
 -Or-
☐ **\$129** The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.
 -Or-
☐ **\$57** The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

Step 3. Add the filing fees from Step 1 and Step 2.

The total filing fee for the motion/opposition I am filing with this form is:

☐ **\$0** ☒ **\$25** ☐ **\$57** ☐ **\$82** ☐ **\$129** ☐ **\$154**

Party filing Motion/Opposition: WILLICK LAW GROUP Date: 3/15/2021

Signature of Party or Preparer: /s/ Victoria Javiel

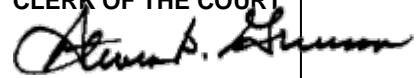
EXHIBIT “EEE”

EXHIBIT “EEE”

EXHIBIT “EEE”

DISTRICT COURT
CLARK COUNTY, NEVADA

Electronically Filed
3/23/2021 11:43 AM
Steven D. Grierson
CLERK OF THE COURT



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

Case No.: D-20-605933-F
Department J

NOTICE OF HEARING

Please be advised that the Petitioner, Paula Blount's Motion for an Order to Show Cause as to Why Respondent, Justin blount, Should not be Held In Contempt, For Monetary Sanctions, and for Attorney's Fees and Costs in the above-entitled matter is set for hearing as follows:

Date: May 13, 2021
Time: 11:00 AM
Location: Courtroom 05
Family Courts and Services Center
601 N. Pecos Road
Las Vegas, NV 89101

NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Carmelo Coscolluela
Deputy Clerk of the Court

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

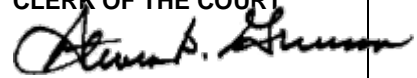
By: /s/ Carmelo Coscolluela
Deputy Clerk of the Court

000912

EXHIBIT “FFF”

EXHIBIT “FFF”

EXHIBIT “FFF”



EPAO
WILICK LAW GROUP
MARSHAL S. WILICK, ESQ.
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3591 E. Bonanza Road, Suite 200
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Phone (702) 438-4100; Fax (702) 438-5311
email@willicklawgroup.com
Attorney for Paula Blount

**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,

vs.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,

Parent(s)/Respondents.

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

DATE OF HEARING:
TIME OF HEARING:

***EX PARTE APPLICATION FOR AN ORDER TO SHOW
CAUSE WHY RESPONDENT, JUSTIN BLOUNT, SHOULD NOT
BE HELD IN CONTEMPT FOR HIS FAILURE TO COMPLY WITH
THE TERMS OF THE ORDER FILED DECEMBER 10, 2020, THE
ORDER FROM THE JANUARY 12, 2021, HEARING, FILED MARCH
9, 2021, AS WELL AS THE GRANDPARENT CUSTODY AND
VISITATION ORDER REGISTERED WITH THIS COURT ON
MARCH 18, 2020.***

Petitioner, Paula Blount, by and through her attorneys of the WILICK LAW GROUP, hereby moves this Court to issue an *Order to Show Cause* requiring Respondent, Justin Blount, to personally appear and show cause why he should not be

1 found in contempt and sanctioned for his failure to comply with the terms of the *Order*
2 filed December 10, 2020, the *Order From the January 12, 2021, Hearing*, filed March
3 9, 2021, as well as the *Grandparent Custody and Visitation Order* issued by the
4 Hualapai Tribal Court in Arizona on January 30, 2020, and subsequently registered
5 with this Court on March 18, 2020.

6 In addition, Justin should show cause as to why he should not pay all fees
7 incurred by Paula in these proceedings.

8 This *Application* is made and based upon the pleadings, papers, and other
9 documents on file herein, and any oral argument of counsel allowed by the Court at the
10 time of hearing this matter.

11 **POINTS AND AUTHORITIES**

12 **I. RELEVANT FACTS**

13 Petitioner, Paula Blount, is the paternal grandmother to the subject minors
14 referenced above, i.e., Jeremiah Blount, born January 19, 2010, and Kaydi Blount, born
15 February 19, 2013.¹

16 Justin Blount is the Petitioner's son, and Gretchen Whatoname was the minor
17 children's biological mother. Gretchen passed away on December 27, 2017.

18 Prior to Justin cutting off contact between the minor children and their
19 grandmother, Paula regularly cared for the minor children and was their primary
20 caregiver for many years. Her and the children obviously developed a bond over those
21 many years and she has regularly sought contact with the children over the past three
22 years through multiple outlets to facilitate that relationship.

23 After the Clark County District Court (Family Division) dismissed her initial
24 *Petition* for grandparent visitation (and her appeal was ultimately denied) on the
25 premise that the Hualapai Tribal Court in Arizona maintained continuing exclusive
26

27
28 ¹ Both Jeremiah and Kaydi are registered members of the Hualapai Tribe, which is a federally
recognized Indian Tribe located on the Hualapai Indian Reservation in Northwestern Arizona.

jurisdiction, Paula filed a *Petition* on December 9, 2019, in the Hualapai Tribal Court seeking grandparent visitation. The *Notice of Hearing* relating to Paula's *Petition* was provided to all interested parties.

Paula then appeared before the Tribal Court on January 30, 2020, wherein it issued a *Grandparent Custody and Visitation Order*. In that *Order*, the Tribal Court found and ordered as follows:

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, 201[7]. . . This Court has since continued to exercise jurisdiction over these children.²

On December 9, 2019, the Petitioner filed a Petition for Grandparents Visitation Rights pursuant to Chapter 20 of the Hualapai Law & Order Code. The matter was set for a Motion Hearing, and Notice was e-mailed to the Respondent's counsel of record on December 30, 2019, at 1549 hrs. The Clerk reports that there has been no returned e-mail as undeliverable. The Court does not, however, that there are errors in the Notice, specifically the caption is mistakenly captioned as "Waite, Trevor v. Blount, Justin/Whatoname, Gretchen" and the date on the Notice is listed as February 26, 2019. It does however, give notice of a Motion Hearing on today's date at 0900 hrs, and Mr. Waite could have contacted the Court to seek clarification.³

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

- a. Every other weekend, beginning on Fridays at 1600hrs (Nevada Time) and ending on Sundays at 1800hrs (Nevada Time), starting on Friday, February 7, 2020, and alternating every other weekend thereafter;
- b. The Months of June and July in every year, beginning on June 1, at 1700hrs (Nevada Time) and ending on July 31, at 1800hrs (Nevada Time);
- c. Christmas breaks in every even-numbered year, beginning on December 24, Even Year, at 1700hrs (Nevada Time) and ending on January 3, Odd-Year, at 1800hrs (Nevada Time);
- d. Telephonic Visitation: The Petitioner is awarded telephonic visitation with the children on:
 - i. Every Wednesday, at 1800hrs (Nevada Time); and

² *Grandparent Custody and Visitation Order*, filed January 30, 2020, page 1, lines 23-25.

³ *Id.*, page 2, lines 1-7.

- 1 ii. Sundays when the Petitioner does not have
- 2 custody/visitation with the children, at 1500hrs (Nevada
- 3 Time);
- 4 iii. The telephone calls shall not be monitored or conducted
- 5 on speakerphone;
- 6 iv. The Petitioner shall be responsible for making the phone
- 7 calls to the children and bear the costs;
- 8 v. During June and July when the children are with the
- 9 Petitioner, the Respondent (Justin Blount) shall have
- 10 reciprocal telephonic visitation rights under the same
- 11 terms and conditions outlined above;⁴

12 As a result of those findings and orders, the Tribal Court awarded Paula joint

13 legal and physical custody of the minor children pursuant to a specific schedule to

14 which Justin has failed to even acknowledge, let alone follow. So as to pursue

15 enforcement of the clear and unambiguous custody orders issued by the Tribal Court,

16 Paula filed her *Registration of Foreign Custody Orders* on March 18, 2020, wherein

17 she attached, as Exhibit “A”, the *Grandparent Custody and Visitation Order*, filed

18 January 30, 2020.

19 Justin, through counsel, accepted service of Paula’s *Registration* on April 6,

20 2020. Justin filed an *Opposition* to Paula’s *Registration* on April 30, 2020, and failed

21 to submit a request for a hearing at the time of his *Opposition* in violation of NRS

22 125A.465(6). Paula filed her *Reply* to Justin’s *Opposition* on July 9, 2020.

23 On or around August 10, 2020, Stephanie and Justin filed a document entitled

24 *Motion to Invalidate*. The same was purportedly served by mail on August 13, 2020,

25 although the *Proof of Service* was filed on August 20, 2020, and the undersigned did

26 not receive a copy of their *Motion* until August 18, 2020.

27 Paula filed an *Opposition and Countermotion* on September 1, 2020, and the

28 parties subsequently appeared before the Court on October 20, 2020. After hearing

argument from the parties, the Court took the matter under advisement and issued a

⁴ *Id.*, page 3, lines 1-18.

1 written decision on November 2, 2020. By way of that *Minute Order*, the Court
2 correctly concluded that the Hualapai Tribal Court never relinquished UCCJEA
3 jurisdiction to Nevada, that the Hualapai Tribal Court still has continuing exclusive
4 jurisdiction, and that the orders from the Hualapai Tribal Court must be given full faith
5 and credit.

6 In an ongoing effort to further restrict Paula's ability to communicate with her
7 grandchildren, Justin filed a *Notice of Appeal* and a *Motion to Stay* within 10 days of
8 the Court's determination. Since the initiation of this case, Justin has refused to abide
9 by the Court's orders and all of Paula's court-ordered visitation has been denied since
10 February 7, 2020. This necessarily includes all of the following weekends and
11 visitation time:

- 12 • February 7-9, 2020 (two days)
- 13 • February 21-23, 2020 (two days)
- 14 • March 6-8, 2020 (two days)
- 15 • March 20-22, 2020 (two days)
- 16 • April 3-5, 2020 (two days)
- 17 • April 17-19, 2020 (two days)
- 18 • May 1-3, 2020 (two days)
- 19 • May 15-17, 2020 (two days)
- 20 • May 29-31, 2020 (two days)
- 21 • June 1 - July 31, 2020 (61 days)
- 22 • August 7-9, 2020 (two days)
- 23 • August 21-23, 2020 (two days)
- 24 • September 4-6, 2020 (two days)
- 25 • September 18-20, 2020 (two days)
- 26 • October 2-4, 2020 (two days)
- 27 • October 16-18, 2020 (two days)
- 28 • October 30 - November 1, 2020 (two days)

- November 13-15, 2020 (two days)
- November 27-29, 2020 (two days)
- December 11-13, 2020 (two days)
- December 24, 2020 - January 3, 2021 (10 days)
- January 8-10, 2021 (two days)
- January 22-24, 2021 (two days)
- February 5-7, 2021 (two days)
- February 19-21, 2021 (two days)
- March 5-7, 2021 (two days)

In total, Justin has willfully violated the terms of the Court's Orders, and that doesn't account for his refusal to abide by all of the telephonic visitation arrangements, **119 times**. Justin also denied Paula's weekend visitation for March 19th.

Paula filed her *Motion for an Order to Show Cause as to Why Respondent, Justin Blount, Should Not be Held in Contempt, for Monetary Sanctions, and for Attorney's Fees and Costs*, on March 19, 2021.

II. LEGAL ANALYSIS

The legal analysis for the contempt and fees requested are set out in Paula's *Motion*. As to this *Application*, EDCR 5.510 states, in relevant part:

(b) The party seeking the OSC shall submit an ex parte application for issuance of the OSC to the court, accompanied by a copy of the filed motion for OSC and a copy of the proposed OSC.

(c) Upon review of the motion and application, the court may:

- (1) Deny the motion and vacate the hearing;
- (2) Issue the requested OSC, to be heard at the motion hearing;
- (3) Reset the motion hearing to an earlier or later time; or
- (4) Leave the hearing on calendar without issuing the OSC so as to address issues raised in the motion at that time, either resolving them or issuing the OSC at the hearing.

1 (d) If an OSC is issued in advance of the first hearing, the moving party
2 shall serve it and the application for OSC on the accused contemnor.

3 (e) At the first hearing after issuance of an OSC, the accused contemnor
4 may be held in contempt, or not, or the court may continue the hearing with
5 directions on the issue. At the first or any subsequent hearing after issuance of
6 an OSC, if the accused contemnor does not appear, a bench warrant may be
7 issued to secure attendance at a future hearing, or other relief may be ordered.

8 This *Application* seeks only to have the issuance of an order for a hearing to be held,
9 and is therefore one that may be submitted *ex parte*, the objective being that only a
10 single contested hearing, on notice, should be required for any motion to have a party
11 held in contempt of a prior order.

12 III. CONCLUSION

13 Based on the above, Paula respectfully requests the following relief:

- 14 1. For the issuance of an *Order to Show Cause* as to why Justin should not
15 be held in contempt, and requiring him to attend the upcoming *Motion*
16 hearing. A proposed *Order* is submitted with this *Application*.

17 **DATED** this 23rd day of March, 2021.

18 Respectfully Submitted By:

19 WILICK LAW GROUP

20 /s/ *Trevor M. Creel*

21 **MARSHAL S. WILICK, ESQ.**

22 Nevada Bar No. 2515

23 **TREVOR M. CREEL, ESQ.**

24 Nevada Bar No. 11943

25 3591 E. Bonanza Road, Suite 200

26 Las Vegas, Nevada 89110-2101

27 Attorneys for Paula Blount

28 P:\wp19\BLOUNT,P\DRAFTS\00489402.WPD

EXHIBIT “A”

EXHIBIT “A”

EXHIBIT “A”

1 **OSC**
2 **WILLICK LAW GROUP**
3 **MARSHAL S. WILLICK, 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 Attorney for Paula Blount

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 Parent(s)/Respondents.

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

DATE OF HEARING:
TIME OF HEARING:

23 **ORDER TO SHOW CAUSE**

24 Upon Application of Petitioner, Paula Blount, by and through her attorneys of
25 the WILLICK LAW GROUP, and good cause appearing therefor:

26 It is hereby ordered, adjudged, and decreed that Respondent, Justin Blount, shall
27 personally appear on the _____ day of _____, 2021, at the hour of
28 _____ A.M./P.M. before Department J of the Eighth Judicial District Court, Family
Division, located at 601 North Pecos Road, Las Vegas, Nevada 89101, Courtroom 5,
and show cause, if any exists:

1 1. Why he should not be found and held in contempt for his failure to comply
2 with the terms of the *Grandparent Custody and Visitation Order* issued by the
3 Hualapai Tribal Court in Arizona on January 30, 2020, and subsequently registered
4 with this Court on March 18, 2020, which provides, in relevant part:

5 This Court has exercised jurisdiction over these children, who are
6 enrolled members of the Hualapai Tribe, since the original petition for custody
7 was filed by the children's mother on February 26, 201[7]. . . This Court has
8 since continued to exercise jurisdiction over these children.¹

9 On December 9, 2019, the Petitioner filed a Petition for Grandparents
10 Visitation Rights pursuant to Chapter 20 of the Hualapai Law & Order Code
11 The matter was set for a Motion Hearing, and Notice was e-mailed to the
12 Respondent's counsel of record on December 30, 2019, at 1549 hrs. The
13 Clerk reports that there has been no returned e-mail as undeliverable. The
14 Court does not, however, that there are errors in the Notice, specifically the
15 caption is mistakenly captioned as "Waite, Trevor v. Blount,
16 Justin/Whatoname, Gretchen" and the date on the Notice is listed as February
17 26, 2019. It does however, give notice of a Motion Hearing on today's date
18 at 0900 hrs, and Mr. Waite could have contacted the Court to seek
19 clarification.²

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

- 23 a. Every other weekend, beginning on Fridays at 1600hrs (Nevada
24 Time) and ending on Sundays at 1800hrs (Nevada Time),
25 starting on Friday, February 7, 2020, and alternating every other
26 weekend thereafter;
- 27 b. The Months of June and July in every year, beginning on June
28 1, at 1700hrs (Nevada Time) and ending on July 31, at 1800hrs
(Nevada Time);
- c. Christmas breaks in every even-numbered year, beginning on
December 24, Even Year, at 1700hrs (Nevada Time) and ending
on January 3, Odd-Year, at 1800hrs (Nevada Time);
- d. Telephonic Visitation: The Petitioner is awarded telephonic
visitation with the children on:
 - i. Every Wednesday, at 1800hrs (Nevada Time); and
 - ii. Sundays when the Petitioner does not have
custody/visitation with the children, at 1500hrs (Nevada
Time);

¹ *Grandparent Custody and Visitation Order*, filed January 30, 2020, page 1, lines 23-25.

² *Id.*, page 2, lines 1-7.

- 1 iii. The telephone calls shall not be monitored or conducted
2 on speakerphone;
3 iv. The Petitioner shall be responsible for making the phone
4 calls to the children and bear the costs;
5 v. During June and July when the children are with the
6 Petitioner, the Respondent (Justin Blount) shall have
7 reciprocal telephonic visitation rights under the same
8 terms and conditions outlined above;³

9 2. Why he should not be found and held in contempt pursuant to NRS
10 22.010.

11 3. Why he should not be sanctioned and/or incarcerated to compel his
12 compliance, with the understanding that he can purge himself of any sentence issued
13 by this Court, or obtain an early release, in the event he complies with this Court's
14 orders and provides Paula, through the WILICK LAW GROUP, with a lump sum
15 payment to be determined by the Court.

16 4. Why he should not be directed to pay Paula's reasonable attorney's fees
17 and costs pursuant to Subsection 3 of NRS 22.010, and other relevant statutes and case
18 law, based on such contempt.

19 **IT IS SO ORDERED.**

20 _____
21 Respectfully Submitted By:
22 WILICK LAW GROUP

23 /s/ Trevor M. Creel

24 _____
25 MARSHAL S. WILICK, ESQ.
26 Nevada Bar No. 2515
27 TREVOR M. CREEL, ESQ.
28 Nevada Bar No. 11943
29 3591 E. Bonanza Road, Suite 200
30 Las Vegas, Nevada 89110-2101
31 Attorneys for Paula Blount

32 P:\wp19\BLOUNT,P\IDRAFTS\Order to Show Cause_mtd.WPD/TMC

33 _____
34 ³ *Id.*, page 3, lines 1-18.

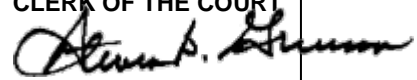
EXHIBIT “GGG”

EXHIBIT “GGG”

EXHIBIT “GGG”

DISTRICT COURT
CLARK COUNTY, NEVADA

Electronically Filed
3/23/2021 11:43 AM
Steven D. Grierson
CLERK OF THE COURT



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

Case No.: D-20-605933-F
Department J

NOTICE OF HEARING

Please be advised that the Petitioner, Paula Blount's Motion for an Order to Show Cause as to Why Respondent, Justin blount, Should not be Held In Contempt, For Monetary Sanctions, and for Attorney's Fees and Costs in the above-entitled matter is set for hearing as follows:

Date: May 13, 2021
Time: 11:00 AM
Location: Courtroom 05
Family Courts and Services Center
601 N. Pecos Road
Las Vegas, NV 89101

NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Carmelo Coscolluela
Deputy Clerk of the Court

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

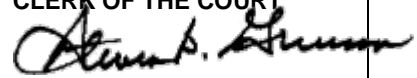
By: /s/ Carmelo Coscolluela
Deputy Clerk of the Court

000926

EXHIBIT “HHH”

EXHIBIT “HHH”

EXHIBIT “HHH”



CSERV
WILLICK LAW GROUP
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Phone (702) 438-4100; Fax (702) 438-5311
email@willicklawgroup.com
Attorney for Paula Blount

**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,

vs.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,
Parent(s)/Respondents.

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

DATE OF HEARING: 5/13/2021
TIME OF HEARING: 11:00 A.M.

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the WILLICK LAW GROUP and that on this 23RD day of March, 2021, I caused the above and foregoing entitled document *Notice of Hearing*, to be served as follows:

[X] 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.

1 [X] By placing same to be deposited for mailing in the United States Mail, in
2 a sealed envelope upon which first class postage was prepaid in Las
3 Vegas, Nevada.

4 [] Pursuant to EDCR 7.26, to be sent via facsimile, by duly executed
5 consent for service by electronic means.

6 [] By hand delivery with signed Affidavit of Service.

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

8 Trevor R. Waite, Esq.
9 Daniel Mann, Esq.
10 Alverson Taylor & Sanders
11 6605 Grand Montecito Parkway, Ste. 200
12 Las Vegas, Nevada 89149
13 Twate@AlversonTaylor.com
14 Attorneys for Father/Respondent

15 Candice Fox
16 2364 Wiki Way
17 Camp Verde, Arizona 86322
18 Arizona Counsel for Petitioner, Paula Blount

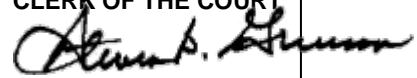
19 Stephanie Blount
20 Justin Blount
21 PO Box 61521
22 Las Vegas, Nevada

23 /s/ *Victoria Javiel*
24 _____
25 An Employee of the WILICK LAW GROUP

26 P:\wp19\BLOUNT,P\DRAFTS\00489526.WPD/VJ

DISTRICT COURT
CLARK COUNTY, NEVADA

Electronically Filed
3/23/2021 11:43 AM
Steven D. Grierson
CLERK OF THE COURT



Paula Blount, Plaintiff.

vs.

Justin Blount, Defendant.

Case No.: D-20-605933-F

Department J

NOTICE OF HEARING

Please be advised that the Petitioner, Paula Blount's Motion for an Order to Show Cause as to Why Respondent, Justin Blount, Should not be Held In Contempt, For Monetary Sanctions, and for Attorney's Fees and Costs in the above-entitled matter is set for hearing as follows:

Date: May 13, 2021

Time: 11:00 AM

Location: Courtroom 05
Family Courts and Services Center
601 N. Pecos Road
Las Vegas, NV 89101

NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Carmelo Coscolluela
Deputy Clerk of the Court

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

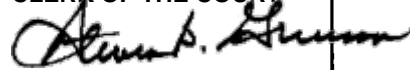
By: /s/ Carmelo Coscolluela
Deputy Clerk of the Court

000930

EXHIBIT “III”

EXHIBIT “III”

EXHIBIT “III”



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

CASE NO.: D-20-605933-F

DEPT. NO.: J

**RESPONDENT'S OPPOSITION TO
PETITIONER, PAULA BLOUNT'S
MOTION FOR AN ORDER TO SHOW
CAUSE AS TO WHY RESPONDENT,
JUSTIN BLOUNT, SHOULD NOT BE
HELD IN CONTEMPT, FOR
MONETARY SANCTIONS, AND FOR
ATTORNEY'S FEES AND COSTS.**

v.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,

Father/Respondent.

HEARING DATE: May 13, 2021
TIME: 11:00 AM

Comes now JUSTIN BLOUNT, ("Respondent"), by and through his attorneys, Trevor R. Waite, Esq., and Daniel A. Mann, Esq., of the law firm of Alverson Taylor & Sanders, and files his RESPONDENT'S OPPOSITION TO PETITIONER, PAULA BLOUNT'S MOTION

KRB/26109
000932

ALVERSON TAYLOR & SANDERS

LAWYERS

6605 GRAND MONTECITO PKWY STE 200

LAS VEGAS, NV 89149

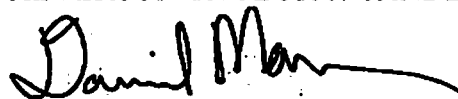
(702) 384-7000

1 FOR AN ORDER TO SHOW CAUSE AS TO WHY RESPONDENT, JUSTIN BLOUNT,
2 SHOULD NOT BE HELD IN CONTEMPT, FOR MONETARY SANCTIONS, AND FOR
3 ATTORNEY'S FEES AND COSTS.

4 This Opposition is based upon the pleadings and papers already on file with the Court, the
5 attached Memorandum of Points and Authorities, all attached affidavits and exhibits, and any oral
6 argument allowed by the Court at the hearing on this matter.

7
8 DATED this 2nd day of April, 2021.

9 ALVERSON TAYLOR & SANDERS

10 

11 KURT R. BONDS, ESQ.

12 Nevada Bar #6228

13 TREVOR R. WAITE, ESQ.

14 Nevada Bar #13779

15 DANIEL A. MANN, ESQ.

16 Nevada Bar #15594

17 6605 GRAND MONTECITO PARKWAY
18 SUITE 200

19 LAS VEGAS, NEVADA 89149

20 (702) 384-7000

21 FAX (702) 385-7000

22 efile@alversontaylor.com

23 *Attorneys for Father*

24 **POINTS AND AUTHORITIES**

25 **I.**

26 **OVERVIEW**

27 Petitioner has falsely accused Respondent of not letting her take the children on her
28 weekends before the Order of the Court on December 10, 2020, when in fact she was coming up
on the wrong days to pick them up. *See Exhibit A.* Furthermore, Since the registration of the
foreign custody order, there has been no attempts made by Petitioner to call and speak to the
children during her time to communicate with them. Only on Christmas Eve did Paula come on

1 the appropriate day but arrived an hour late. See **Exhibit B**. Visitation was refused at that time
2 because the Respondent was waiting for the pending outcome of the motion for stay pending
3 appeal. The motion to stay custody order pending appeal was denied on January 12, 2021. After
4 that, on January 22, 2021, Petitioner may have showed up to pick up the children, but Respondent
5 and his family were not home because Jeremiah was found with a knife underneath his bed and
6 saying he was going to kill himself if he had to go be with Paula. He threw objects at his mother's
7 pregnant stomach which made them go to the ER to monitor the baby and help Jeremiah be on
8 suicide watch. Respondent attempted to email Petitioner about the situation, but she never
9 responded. When Jeremiah was discharged, they diagnosed him with DMDD, PTSD, and having
10 legal trauma. See **Exhibit C**.

12 On February 5th, Respondent has a camera on doorstep that documents any activity from
13 the front door and Paula never showed up. See **Exhibit D**. The next visit, on February 19th, again,
14 the doorbell camera does not capture any activity of Paula coming to pick up the children and
15 Respondent was home waiting for her. See **Exhibit E**.

17 On the morning of March 5, 2021, Jeremiah stole money and was planning on running
18 away so he and his sister would not have to go with Paula. He even wrote a runaway letter detailing
19 the reason he was leaving was so he would not have to go be with the "Mean People," which are
20 Paula and the maternal relatives. See **Exhibit F**. When his sister told on him to his mother what
21 his plans were, Jeremiah started strangling his sister almost to the point of her blacking out. When
22 his mother saw him strangling his sister, she broke them apart and made sure keydi was safe.
23 Jeremiah was adamant on not wanting to leave with Paula and took a kitchen knife and started
24 swinging at his mother. His mom attempted to block the knife swings and ended up getting a cut
25 along her forearm, but she eventually got the knife from him. Police were called and Jeremiah was
26 arrested for domestic battery and domestic battery with a deadly weapon. See **Exhibit G**. He was
27
28

1 placed in psych watch in the juvenile detention center that day and therefore was not able to be
2 picked up for the custody order.

3 After the arrest of Jeremiah, Child Protective Services (CPS) was called and Erica Barbour,
4 a caseworker, came out and spoke with Respondent and his wife about the situation. Because of
5 the Journal entries found and runaway letter, Erica told Respondent and his wife that CPS will start
6 an investigation about the alleged abuse Jeremiah was claiming took place with Paula and that the
7 Blount's should not have the children leave the state of Nevada nor could they leave the state as
8 well until their investigation was over. *See Exhibit H.* Respondent spoke to the CPS caseworker
9 about the custody order, and she said that they should not allow their daughter or son to leave the
10 state pending the outcome of the investigation. Respondent, out of fear of disobeying the orders of
11 CPS, refused to let his daughter go with Paula when she came on March 5th, 2021. *See Exhibit I.*

12 When March 19th came around, Jeremiah was still detained in the Juvenile detention center
13 and CPS had never informed Respondent if the investigation were over and that his children or
14 him could leave the state. Respondent anticipated Paula would try and pick up his daughter again,
15 but she never showed up to the house. Instead, she came to his work and harassed him about how
16 he has no rights to the children, and she was going to take them away. *See Exhibit J.*

17 Surprisingly, on March 26, not a day for Paula to have custody over the children, Paula and
18 the maternal grandmother of the children, Gretchen, went to the juvenile detention center and
19 spoke with Jeremiah's Parole officer and demanded him to be released to them because they have
20 a custody order from the Hualapai Tribal Court dated in November 2020, that only the children's
21 grandparents had physical and legal custody over the children. When the officer refused to release
22 Jeremiah, the grandparents went to Child Protective Services and spoke with Sarah Evans,
23 supervisor to Erika Barbour, and again showed the custody order form the Hualapai Tribal Court
24 and demanded that the children should be turned over to them immediately. They were informed
25
26
27
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1 by Sara Evans, that they were unable to remove the children because there was no evidence of
2 endangered or harm in their current household for the children to be removed from their parents.

3 **See Exhibit K.**

4 At Jeremiah's delinquency proceeding, he has plead guilty to Domestic Violence Battery
5 and is now waiting to see if the Court wants to send him to a inpatient care for his trauma. The
6 proceedings have evidence of the parole officer talking about Paula coming to him and showing
7 the November 2020 custody order and demanding that Jeremiah goes to her and that Respondent
8 has zero rights to custody. Jeremiah is still detained awaiting decision of the Court if he should get
9 in patient care or not.
10

11 Petitioner has only come to pick up the children on the appropriate days on December 24,
12 2021, possibly January 22, 2021, and March 5th, 2021. It is unclear by the previous conduct of the
13 Petitioner, Paula Blount, if she will pick up the kids or not on April 2nd, 2021.
14

15 **II.**

16 **ARGUMENT**

17 **A. Cause is shown by the Respondent for not giving visitation on December 24, 2020 for**
18 **Petitioner because of pending outcome to litigation.**

19 What was previously explained in the overview of this motion is that there was already a
20 pending Motion to Stay Custody Order Pending Appeal during the December 24th pick up that
21 Respondent did not feel the custody order should be followed until that motion was decided on. If
22 the court feels this is insufficient to show cause then because that visit was for a particular time of
23 season and special holiday, Respondent will agree to Petitioner getting the next two Christmas
24 season to make up the time lost from the previous Christmas time. Fees and jail time for missing
25 this one occurrence is excessive and does not meet the best interest of the child or accurately
26 compensate the Petitioner for what was lost and that was time with her grandchildren during
27 Christmas time.
28

B. Cause is shown by the Respondent for not giving visitation on January 22, 2021 for Petitioner because of family emergency that took them away from the home at time of visitation.

It is still in question if Petitioner even showed up on January 22, 2021, but Respondent had a family emergency for Jeremiah was claiming to commit suicide and was throwing objects at his mother that made her go to the hospital to monitor her pregnant stomach and to make sure the baby was okay. Jeremiah had to be put under suicidal watch since he had a knife under his bed and was claiming he would kill himself rather than go with Paula. Respondent made attempts to communicate with Petitioner about the family emergency and the inability to allow her visitation at that time but received no response if she came by or got his messages. Respondent pleas with the court to see cause for missing this day and not hold Respondent in contempt for being unavailable for Petitioner to have visitation because of the family emergency.

C. Cause is shown by the Respondent for not giving visitation on March 5, 2021 for Petitioner because of Jeremiah's arrest, detainment, and CPS's investigation.

When Paula came at 4:24 pm on March 5, 2021, Police had already come by and took Jeremiah to juvenile detention center, CPS had already come by and said they were opening an investigation and told Respondent not to have the children leave the state. At that point it was out of Respondent's control in having the kids available for visitation since Paula wants to take the children out of Nevada and he could not allow it pursuant to what CPS told him. If he disobeyed CPS, then they could determine him to be an unfit parent for permitting his children to be in a dangerous and harmful situation going with Paula and leaving the state. Jeremiah was unavailable and still is unavailable since he is detained at the juvenile detention center awaiting the Court to decide what inpatient facility they want to send him.

Respondent should not be held in contempt for things that are out of his control. His son has been detained and CPS had opened an investigation that day. If the court finds that this reason

1 is insufficient to show cause, then Respondent requests the court to allow make up time to the
2 Petitioner rather than fees and jailtime since those would not be in the best interest of the child and
3 does not accurately retribute what was lost and that is time.

4 **D. Petitioner's deception to this Court, the juvenile detention center, and CPS is evidence**
5 **of Petitioner's attempt to use this registered custody order as a disguise to kidnap the**
6 **children and hide them in the Hualapai Tribe Reservation.**

7 Respondent is concerned about future visitation after the incidents on March 26, 2021,
8 when Paula and the maternal grandmother of the minor children attempted to use an unregistered
9 custody order from the Hualapai Tribal Court dated November 2020, that gave full custody of the
10 children to the grandparents, to coercively get Jeremiah out of the juvenile detention center and
11 both kids from CPS. These attempts show complete disregard to the registered custody order and
12 Paula's intent to not follow it regarding returning the children to Respondent when it is his days.

13 Respondent had established that this custody order should never been registered because
14 the Tribal court did not have jurisdiction, there was no notice given to essential parties, and the
15 custody order has already been modified by the tribe. *See* NRS 125A.465(6). This current
16 predicament is why NRS 125A.465(6)(b) was passed to avoid conflicting custody orders and
17 possible loss of redress. Here Nevada wants to enforce the registered custody order that gives Paula
18 physical and legal custody of the minor children every other weekend. But once she has the
19 children and enters the Hualapai reservation, they will follow the November 2020 custody order
20 that shows Respondent has no physical or legal custody over his own children. Respondent and
21 his wife, who is an essential party to these proceedings, never got noticed about the November
22 2020 custody order to have their voice heard and rights defended against it.

23 Paula has shown her true colors that she attempts to take the children to the Hualapai tribe
24 and never return them. Paula is trying to bait and switch the Respondent by showing a custody
25 order that shows joint custody in Nevada to trick Respondent and wife to give up their children so
26
27
28

1 she can switch around and use the modified custody order that shows the parents have no rights.

2 How is Respondent supposed to find redress in that?

3 Respondent is not dealing with another state court of competent jurisdiction if he goes
4 down to the Hualapai Tribe to regain his kids. He is dealing with a sovereign nation that has their
5 own rules and laws that do not measure up to the standards and rights of the United States of
6 America, or the State of Nevada. Full faith and credit clause only goes so far and NRS 125A.
7 465(6)(c) indicates that the standard of notice to be applied to the registered foreign custody order
8 is from Nevada's own rules and not that of the Foreign court. *See* NRS 125A. 465(6)(c). Even if
9 Hualapai tribe had Jurisdiction, how they have conducted these child custody hearings have been
10 subpar and deficient in providing adequate notice to respondent and his wife which is necessary in
11 Nevada law. *See* NRS 125A.255. This will continue to happen if the children go to Paula. They
12 will disappear in the reservation being covered up by the tribal court custody order they made
13 without notice to Respondent.
14

15 To avoid potential loss of the children and danger to them, Respondent requests that the
16 Court has an evidentiary hearing to determine Paula's motives and if she will willfully disobey the
17 registered custody orders. While we wait for the evidentiary hearing to take place, Respondent
18 requests the Court to place a stay on the registered custody order pending the outcome of the
19 evidentiary hearing.
20

21 II.

22 CONCLUSION

23 In light of the foregoing arguments in opposition to Petitioner's motion, Respondent
24 respectfully requests that this Court DENY her motion in its entirety, or in the alternative request
25 an evidentiary hearing to determine what was said at Jeremiah's delinquency proceeding and view
26 at face the Child Protective Services case file. Respondent further requests an evidentiary hearing
27
28

1 to determine Paula's motives and if she will willfully disobey the registered custody orders. While
2 we wait for the evidentiary hearing to take place, Respondent requests the Court to place a stay on
3 the registered custody order pending the outcome of the evidentiary hearing.

4 DATED this 2nd day of April, 2021.

5 ALVERSON TAYLOR & SANDERS

6 
7

8 KURT R. BONDS, ESQ.

Nevada Bar #6228

9 TREVOR R. WAITE, ESQ.

Nevada Bar #13779

10 DANIEL A. MANN, ESQ.

Nevada Bar #15594

11 6605 GRAND MONTECITO PARKWAY

12 SUITE 200

13 LAS VEGAS, NEVADA 89149

14 (702) 384-7000

15 FAX (702) 385-7000

16 efile@alversontaylor.com

17 *Attorneys for Father*

18 **CERTIFICATE OF SERVICE VIA CM/ECF**

19 I hereby certify that on this 2nd day of April, 2021, I did serve, via Case
20 Management/Electronic Case Filing, a copy of the above RESPONDENT'S OPPOSITION TO
21 PETITIONER, PAULA BLOUNT'S MOTION FOR AN ORDER TO SHOW CAUSE AS TO
22 WHY RESPONDENT, JUSTIN BLOUNT, SHOULD NOT BE HELD IN CONTEMPT, FOR
23 MONETARY SANCTIONS, AND FOR ATTORNEY'S FEES AND COSTS addressed to:

24 Trevor M. Creel, Esq.

25 Willick Law Group

26 3591 E. Bonanza Rd., Ste. 200

27 Las Vegas, NV 89110-2101

28 Ph. (702) 438-4100

e-mail: trevor@willicklawgroup.com



An Employee of ALVERSON
TAYLOR & SANDERS

VERIFICATION

I, Justin Blount, hereby declare as follows:

1. That I am the Respondent in the above entitled action;
2. That I have read the preceding *Opposition* and know the contents thereof.
3. That the same is true of my knowledge, except for those matters therein contained stated upon information and belief, and as to those matters I believe them to be true.
4. That the factual assertions contained in the preceding filing are incorporated herein as if set forth in full.
5. I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

DATED this 2nd day of April, 2021.

s/ Justin Blount
JUSTIN BLOUNT

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

**FAMILY COURT MOTION/
OPPOSITION FEE INFORMATION
SHEET (NRS 19.0312)**

Minor Children

PAULA BLOUNT

Grandmother/Petitioner,

v.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,

Father/Respondent.

Party Filing Motion/Opposition: ☐ Plaintiff/Petitioner ☒ Defendant/Respondent

MOTION TO COMPEL DEFENDANT TO PRODUCE VEHICLE

Motions and Oppositions
to Motions filed after entry of
a
final order pursuant to NRS
125, 125B or 125C are
subject
to the Re-open filing fee of
\$25.00, unless specifically
Excluded. (NRS 19.0312)

NOTICE:

*It is determined that a motion or opposition
is filed without payment of the appropriate
fee, the matter may be taken off the Court's
calendar or may remain undecided until
payment is made.*

Mark correct answer with an "X."

1. No final Decree of Custody Order has been
entered. ☐ YES ☒ NO

2. This document is filed solely to adjust the amount of
support for child. No other request is made.

☐ YES ☒ NO

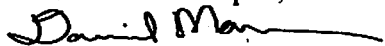
3. This motion is made for reconsideration or a new trial and is
filed within 10 days of the Judge's Order if YES, provide file
date of Order: _____

☐ YES ☒ NO

If you answered YES to any of the questions above, you are not
subject to the \$25 fee.

Motion/Opposition ☒ IS ☐ IS NOT subject to \$25 filing fee

Date this 2nd of April, 2021.



DANIEL A. MANN, ESQ.

KRB/26109
000942

EXHIBIT A

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

☐ Air Notification
☐ Garage Door
☐ Curfew Notification
☒ Other

☐ Disturbance
☐ Drug Activity
☐ Theft
☐ Vandalism

☐ Trespassing
☐ Domestic Violence
☒ Civil Starec 94

Accession #

Event #

Alt Name

Message

2003 VEDASIPULU VINN Q 112111 LV 201200014630

OFFICERS RESERVATION

CONTACT A CIVIL STAREC FOR A 10000000

EXCHANGE - NO EXCHANGE OF THE CIVIL STAREC

FRATERNITY HOUSE 10000000

12/1/10 11:00 AM 11/1/10 11:00 AM

EXHIBIT B



Justin Blount 12/24/2020

to Trevor ^



From Justin Blount • justincblount1@gmail.com
To Trevor Waite • TWaite@alversontaylor.com
Date Dec 24, 2020, 5:59 PM
[View security details](#)

Well paula didnt show up today. If shes following
the orders she should have been here at 5

Show quoted text



Justin Blount 12/24/2020

to Trevor ^



From Justin Blount • justincblount1@gmail.com
To Trevor Waite • TWaite@alversontaylor.com
Date Dec 24, 2020, 6:12 PM
[View security details](#)

Nvm she was just over an hour late

Show quoted text

 Reply

 Reply all

 Forward



EXHIBIT C

MEDICATION RECONCILIATION / DISCHARGE ORDER / TRANSITION RECORD-A

DISCHARGE ORDER: Discharge patient:

- ☒ Home ☐ Hospice - Home ☐ AMA ☐ Skilled Nursing Facility (SNF)
☐ Expired ☐ Hospice - Health Care Facility ☐ Unable to Determine (N/A)
☐ Acute Care Facility (Medical): _____
☐ Board and Care (name): _____ ☐ Group Home (name): _____
☐ Sober Living (name): _____ ☐ Independent Living (name): _____
☐ Residential Treatment Center (name): _____
☐ Other: _____

Document the address and phone number of where patient went:

Address: _____

Phone Number: _____

*If discharged to a home health agency (HHA), skilled nursing facility (SNF), inpatient rehab facility (IRF), or a long-term care hospital (LTC), patient was provided Key Performance Data, including Quality Metrics to assist with discharge planning process - Staff Initials: _____

DISCHARGE DIAGNOSES:

MENTAL HEALTH and PHYSICAL DISORDER:

DMDD, I, W, C, P, T, D

SECONDARY and MEDICAL:

NONE

PSYCHOSOCIAL and CONTEXTUAL FACTORS:

Legal, Trauma

DISABILITY:

NONE

TOR: Dr. Nasirja, Kymryn H. Date 1/26/21 Time 12:00

Provider Signature _____ Date _____ Time _____

Provider Print Name: _____

Noted by: Kymryn H. Date 1/26/21 Time 12:00

MEDICATION RECONCILIATION / DISCHARGE ORDER /
TRANSITION RECORD-A
DEBERT PARKWAY BEHAVIORAL HEALTHCARE HOSPITAL
3247 South Maryland Parkway, Las Vegas, NV 89169

11/2019 Rev. 12/16/2019

Page 2 of 2

Name: Robert, Jonathan
 Address: 2101180, DCB, 1/1/2010, Age 11
 MedRec: 0100007, Box M, DOA, 1/1/2010
 Unit: 400 / 62400 / A
 Dock: _____

000948

EXHIBIT D

Friday, Feb 5, 2021 7:07 AM - 7:10 PM

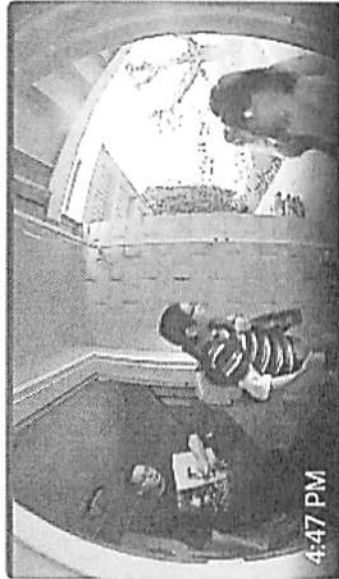
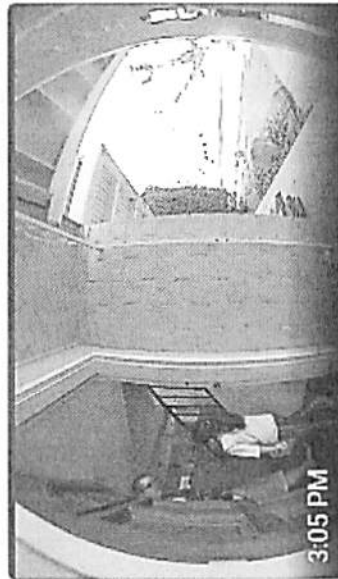
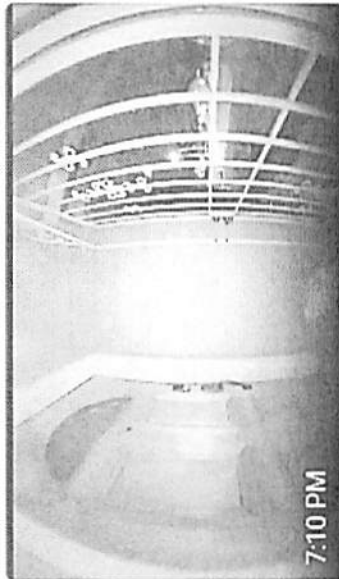


EXHIBIT E

2:22

64%

control.adt.com/web/system/video/clips?page=7

Video

Saved

Recording

Settings

Friday, Feb 19, 2021 6:41 PM - 6:58 PM



EXHIBIT F

To: Mom and Dad

From: Jeremiah


Dear Mom and Dad,


I wish it did not have to come to this. I Me and Kaydi are leaveing. I hopefully will be back next year on my birthday, with Kaydi. Mayde sooner, but I promise I will be back with Kaydi. I love you guys so much you always have a place in my heart Mom and Dad.

Me and Kaydi are leaveing because we don't want to go with the mean people.

I am takeing my jacket, suitcase, glasses, and a little bit of clothes. Thank you guys for everything we will see you guys soon.
Love Jeremiah and Kaydi.

EXHIBIT G

All Cameras  FILTER

BULK ACTIONS Clip Details 



Friday, Mar 5, 2021 5:58 AM - 6:35 PM



Thursday, Mar 4, 2021 6:17 AM - 7:20 PM



EXHIBIT H

I hate Paula as much as the mean people. Paula is mean to Mom, Dad, Luna, and Logan. I hope that we stay together as a family. I want Paula to die and I wish she never existed. She only cares about her self and no one else.

Paula should be locked up for the rest of her life in prison. ~~Our~~ She should just die so no one has to see her again. She is mean and ugly just like the mean people. I hope Covid-19 kills her. Our family is going through a situation with her and we wish she died. I want to tell everybody how mean she really is so she loses her job, house, and car.

Also, I wish Nancy dies too. She said she does not care about me and Kaydi. Paula and Nancy are both the same that's probably why they live in the same house. I want both of them to lose everything and become homeless. Paula is trying to destroy our family, but I will not let her. All mean people and Paula and Nancy should go to jail and never be let out.

I really hate the mean people. They were mean to me and my sister Kaydi. I wish they didn't exist. All the people on the reservation were mean and ugly to my family. For that I hope they get sick and die from Covid-19. The mean people are Hualipi and Hualipi's are dirty, liars, thieves, and ugly.

They locked me and Kaydi outside, through shoes at us and did a lot more mean things. One of the things they did was hideing me and Kaydi from Mom and Dad. The mean people were mean to Dad while we were at Gretchans funeral. They say mean things about my family all the time and try to take me and Kaydi away.

I want the mean people to die and leave this world. They messed up the adoption and everything they do is mean and ugly. I act like them most of the time, but I really hate the mean people. The mean people are not my family because they are mean and ugly to my true family. If I had powers I would wipe out all of the Hualipi from the face of this world.

EXHIBIT I

(702) 455-6073



Monday, March 8, 2021

Just that update you asked for. Kaydi didn't go to the visitation this past weekend. We followed your instruction and gave the officers your info and let them know about the hold on the visitation.

3:24 PM

Enter message



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Next





**Department of
Family Services**

Erika Barbour

Senior Family Services Specialist
Child Protective Services

1850 E Flamingo Rd Ste 235

Las Vegas NV 89119

www.ClarkCountyNV.gov

E-Mail: Erika.Barbour@ClarkCountyNV.gov

Phone: (702) 455-6073

Fax: (702) 456-7124

EXHIBIT J

To whom it may concern:

On Friday, March 19, 2021, at approximately 5:40 PM, a distressed woman made contact with my coworker Justin Blount during his shift at the outside counter of our store. She harassed Justin for a short time before leaving.

Signed,

Jackson Nakagawa
Jackson Nakagawa

EXHIBIT K

Antonia Di Dio

From: Justin Blount <justincblount1@gmail.com>
Sent: Tuesday, March 30, 2021 8:56 AM
To: Daniel Mann; Trevor Waite
Subject: Fwd: Incident on Friday

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

From: Erika Barbour <Erika.Barbour@clarkcountynv.gov>
Date: Tue, Mar 30, 2021, 8:44 AM
Subject: Incident on Friday
To: justincblount1@gmail.com <justincblount1@gmail.com>

Good Morning Mr & Mrs Blount,

I wanted to advise you that I was made aware of an incident that occurred on Friday in regards to your children, Kaydi and Jeremiah. Friday is my regular day off so I was not at the office but I was made aware that a Paula Blount and either a tribal representative or the other grandmother came to the office on Friday with court documentation from The Tribal Courts of the Hualapai Tribe stating that they had custody of the children and reporting that the children needed to be turned over to them immediately. A supervisor at my office (Sara Evans) met with these parties and explained that the children were never identified to be in present or impending danger and therefore the Department of Family Services has no authority to remove the children. Supervisor Evan then continued to explain that we are unable to remove the children and release the children to the parties present as there is no grounds to remove the children.

I do not work for Department of Juvenile Justice Services, where Jeremiah is, but it is my understanding that they also went to the detention center in an attempt to have Jeremiah released to their custody.

Erika Barbour

Senior Family Services Specialist

Clark County Department of Family Services - East

4180 S. Pecos Rd 2nd Floor

Las Vegas, NV 89121

702-455-6073 - Office

This email is privileged, confidential and/or exempt from disclosure. If you are not the intended recipient, any disclosure, copying, distribution, or use of the email (including any reliance thereon) is prohibited. If you received this email in error, please immediately contact the sender and delete the material in its entirety.

Antonia Di Dio

From: Justin Blount <justincblount1@gmail.com>
Sent: Tuesday, March 30, 2021 9:41 AM
To: Daniel Mann; Trevor Waite
Subject: Fwd: Therapist recommendation

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

From: Erika Barbour <Erika.Barbour@clarkcountynv.gov>
Date: Tue, Mar 30, 2021, 9:31 AM
Subject: Therapist recommendation
To: justincblount1@gmail.com <justincblount1@gmail.com>

I wanted to also make a recommendation. It might be beneficial for both Kaydi and Jeremiah to see a trauma-focused cognitive behavioral therapist. In speaking with your family and Jeremiah, it would appear to me that a lot of his behaviors are triggered by trauma. If this trauma is addressed then you might see an improvement overall in his behavior. I know he was diagnosed with ADHD but sometimes the trauma responses can show up with similar behaviors to ADHD. I did a little research and found on therapist. I'm not sure what insurance you have or what she takes but it may be something to look in to.

Hanisee, Patricia

2620 REGATTA DR.
BUILDING 102
Las Vegas, NV 89128

7029947670

Erika Barbour

Senior Family Services Specialist

Clark County Department of Family Services - East

4180 S. Pecos Rd 2nd Floor

Las Vegas, NV 89121

702-455-6073 - Office

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EXHIBIT “JJJ”

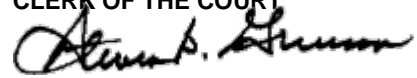
EXHIBIT “JJJ”

EXHIBIT “JJJ”

GFDF

WILICK LAW GROUP
Marshal S. Willick, Esq.
Nevada Bar No. 2515
3591 E. Bonanza Rd., Ste. 200
Las Vegas, Nevada 89110
(702) 438-4100; Fax (702) 438-5311
email@willicklawgroup.com
Attorney for Petitioner

Electronically Filed
5/7/2021 1:17 PM
Steven D. Grierson
CLERK OF THE COURT



District Court, Family Division
Clark County, Nevada

In re Custody/Visitation of JEREMIAH BLOUNT (DOB: 1/19/2010) KAYDI BLOUNT (DOB: 2/19/2013) Minor Children PAULA BLOUNT, Grandmother/Petitioner, vs. JUSTIN BLOUNT, GRETCHEN WHATONAME, Parent(s) Respondents.	Case No.: D-20-605933-F Dept. No.: F
--	---

GENERAL FINANCIAL DISCLOSURE FORM

A. Personal Information:

1. What is your full name? (*first, middle, last*) Paula Jo Blount
2. How old are you? 59
3. What is your date of birth? 12/5/1960
4. What is your highest level of education? Some college

B. Employment Information:

1. Are you currently employed/self-employed? (☒ mark one)

☐ No

☒ Yes If yes, complete the table below. Attach an additional page if needed.

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
7/2/2018	Valentine Elem.	office manager	Mon-Thurs.	6:30 am-5 pm

2. Are you disabled? (☒ mark one)

☒ No

☐ Yes If yes, what is the level of your disability? _____
What agency certified you disabled? _____
What is the nature of your disability? _____

C. Prior Employment: If you are unemployed or have been working at your current job for less than two years, completed the following information.

Prior Employer: _____ Date of Hire: _____ Date of Termination: _____
Reason for leaving: _____

000973

Monthly Personal Income Schedule

A. Year-to-date Income.

As of the pay period ending 4/23/2021 my gross year to date pay is \$40,510.36

B. Determine your Gross Monthly Income.

Hourly Wage

				\$0.00				\$0.00				\$0.00
Hourly wage	X	Number of hours worked per week	=	Weekly Income	X	52 weeks	=	Annual Income	÷	12 Months	=	Gross Monthly Income

Annual Salary

\$44,875.88	÷	12 Months	=	\$3,739.66
Annual Income				Gross Monthly Income

C. Other Sources of Income

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income:			
Bonuses:			
Car, Housing, or Other Allowance:			
Commissions or Tips:			
Net Rental Income:			
Overtime Pay:			
Pension/Retirement Pay:	monthly	\$1,574.08	\$1,574.08
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support:			
Child Support:			
Workman's Compensation:			
Other:			
Total Average Other Income Received			\$1,574.08

Total Average Gross Monthly Income (add totals from B and C above)	\$5,313.74
---	-------------------

D. Monthly Deductions

	Type of Deduction	Amount
1.	Court Ordered Child Support (Automatically deducted from paycheck):	\$0.00
2.	Federal Health Savings Plan:	\$0.00
3.	Federal Income Tax:	\$350.46
4.	<div style="text-align: right;">Amount for you: _____</div> Health Insurance For Opposing Party: _____ For your Child(ren): _____	\$0.00
5.	Life, Disability, or Other Insurance Premiums:	\$408.00
6.	Medicare:	\$53.40
7.	Retirement, Pension, IRA, or 401(k):	
8.	Savings: grandchildren	\$228.34
9.	Social Security:	
10.	Union Dues:	\$
11.	Other (Type of Deduction): state taxes	\$99.44
Total Monthly Deductions:		\$1,139.64

Business/Self-Employment Income and Expense Schedule**A. Business Income:**

What is your average gross (pre-tax) monthly income/revenue from self employment or businesses?

B. Business Expenses: Attach an additional page if needed.

Type of Business Expense	Frequency	Amount	12 Month Average
Advertising/Political Contributions			
Car and Truck used for business			
Commissions, wages or fees			
Business Entertainment/Travel			
Insurance			
Legal and Professional			
Mortgage or rent			
Pension and profit-sharing plans			
Repairs and maintenance			
Supplies			
Taxes and Licenses			
Utilities			
Other:			

Total Average Business Expenses:	\$0.00
---	---------------

Personal Expense Schedule (Monthly)

- A.** Fill in the table with the amount of money **you** spend each month on the following expenses and check whether you pay the expense for you, for the other party, or for both of you.

Expense	Monthly Amount I Pay	For Me <input type="checkbox"/>	Other Party <input type="checkbox"/>	For Both <input type="checkbox"/>
Alimony/Spousal Support				
Auto Insurance	\$100.00	X		
Car Loan/Lease Payment				
Cell Phone	\$210.00	X		
Child Support (if not deducted from pay)	\$0.00			
Clothing, Shoes, Etc. . .				
Credit Card Payments (minimum due)				
Dry Cleaning				
Electric	\$100.00	X		
Food (groceries & restaurants)				
Fuel	\$525.00	X		
Gas (for home)	\$50.00	X		
Health Insurance (if not deducted from pay)	\$575.57	X		
HOA	\$0.00			
Home Insurance (if not included in mortgage)	\$0.00			
Home Phone	\$0.00			
Internet/Cable & Phone	\$107.00	X		
Lawn Care	\$0.00			
Membership Fees	\$0.00			
Mortgage/Rent/Lease	\$800.00	X		
Pest Control	\$35.00	X		
Pets				
Pool Service				
Property Taxes (if not included in mortgage)				
Security				
Titles	\$500.00	X		
Personal Loans	\$1,158.00			
Unreimbursed Medical Expenses				
Water	\$5.00	X		
Other: Justin Attorney	\$35.00	X		

Total Monthly Expenses	\$4,200.57
-------------------------------	-------------------

Household Information

- A. Fill in the table below with the name and date of birth of each child, the person the child is living with, and whether the child is from this relationship. Attach a separate sheet if needed.

	Child's Name	Child's DOB	With whom is the child living?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1.					
2.					
3.					
4.					

- B. Fill in the table below with the amount of money you spend each month on the following expenses for each child.

Type of Expense	1st Child	2nd Child	3rd Child	4th Child
Cellular Phone				
Child Care				
Clothing				
Education				
Entertainment				
Extracurricular & Sports				
Health Insurance (if not deducted from pay)				
Summer Camp/Programs				
Transportation Cost				
Unreimbursed Medical Expenses				
Vehicle				
Other:				
Total Monthly Expenses	\$0.00	\$0.00	\$0.00	\$0.00

- C. Fill in the table below with the names, ages, and the amount of money contributed by all persons living in the home over the age of 18. If more than four adult household members, attach a separate sheet.

Name	Age	Person's Relationship to You (i.e., sister, friend, cousin, etc.)	Monthly Contribution
Nancy Shepard	53	Sister	buys the groceries

--	--	--	--

Personal Asset and Debt Chart

- A.** Complete this chart by listing all of your assets, the value of each, the amount owed on each, and whose name the asset or debt is under. If more than 15 assets, attach a separate sheet.

No.	Description of Asset and Debt Thereon	Gross Value		Total Amount Owed		Net Value	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.			-		=	\$0.00	
2.			-		=	\$0.00	
3.			-		=	\$0.00	
4.			-		=	\$0.00	
5.			-		=	\$0.00	
6.			-		=	\$0.00	
7.			-		=	\$0.00	
8.			-		=	\$0.00	
9.			-		=	\$0.00	
10.			-		=	\$0.00	
11.			-		=	\$0.00	
12.			-		=	\$0.00	
13.			-		=	\$0.00	
14.			-		=	\$0.00	
15.			-		=	\$0.00	
TOTAL VALUE OF ASSETS		\$0.00	-	\$0.00	=	\$0.00	

- B.** Complete this chart by listing all of your unsecured debt, the amount owed on each account, and whose name the debt is under. If more than five unsecured debts, attach a separate sheet.

No.	Description of Credit Card or Other Unsecured Debt	Total Amount Owed	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	Personal loan	\$25,000.00	Self
2.	Personal loan	\$30,000.00	Self
3.			
4.			
5.			
TOTAL UNSECURED DEBT		\$55,000.00	

CERTIFICATION

Attorney Information: Complete the following sentences:

1. I (have/have not) have retained an attorney for this case.
2. As of today's date, the attorney has been paid a total of 26,551.25 on my behalf.
3. I have a credit with my attorney has been paid in the amount of 0
4. I currently owe my attorney a total of 0
5. I owe my prior attorney a total of 0

IMPORTANT: Read the following paragraphs carefully and initial each one.

✓

I swear or affirm under penalty of perjury that I have read and followed all instructions in completing this Financial Disclosure Form. I understand that, by my signature, I guarantee the truthfulness of the information on this Form. I also understand that if I knowingly make false statements I may be subject to punishment, including contempt of court.

I have attached a copy of my three most recent pay stubs to this form.

I have attached a copy of my most recent YTD income statement/P&L statement to this form, if self-employed.

I have not attached a copy of my pay stubs to this form because I am currently unemployed.

P. Blom

Signature

4/26/21

Date

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the WILICK LAW GROUP and that on this

7th day of May, 2021, I caused the above and foregoing document to be served as follows:

- [X] 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.

To the address, e-mail address, and/or facsimile number indicated below:

Trevor R. Waite, Esq.
Alverson Taylor & Sanders
6605 Grand Montecito Parkway, Ste. 200
Las Vegas, Nevada 89149
Twaiite@AlversonTaylor.com
Attorneys for Father/Respondent

/s/ Victoria Javiel
An Employee of the WILICK LAW GROUP

Valentine Elementary
12491 N Byers
HC 35 Box 50
Peach Springs, AZ 86434

DIRECT DEPOSIT RECEIPT

PAYROLL
PAY DATE: 04/09/2021

DIRECT DEPOSIT AMOUNT: *One Thousand Four Hundred Seventy Five and 56/100 Dollars*** **\$1,475.56****

BLOUNT, PAULA J
3834 E LASS AVE
KINGMAN, AZ 86409

NON - NEGOTIABLE

Valentine Elementary

Peach Springs, AZ 86434

BLOUNT, PAULA J	21	BI-WEEKLY	04/03/2021	04/09/2021	4/9/2021
Employee Name	Period	Pay Cycle	End Date	Pay Date	Deposit Date
Federal: Single or Married filing separately, Exe: 1		State: AZ 2.7% of taxable wages			

EARNINGS	Reg Hrs	O/T Hrs	Rate	Amt	Over time	FTD	YTD
Office Manager	0.00	0.00	0.00	1,525.23	0.00	32,029.83	10,676.61
In lieu of Insurance Payment	0.00	0.00	0.00	316.15	0.00	6,639.15	2,213.05
EARNINGS Total:	0.00	0.00		1,841.38		38,668.98	12,889.66

EMPLOYEE DEDUCTIONS	Amount	YTD
FED TAX W/H	175.23	1,226.61
FICA - MEDICARE	26.70	186.90
FICA - SOC SEC	114.17	799.19
STATE TAX W/H	49.72	348.04
DIRECT DEPOSIT SUREPAY	1,475.56	10,328.92
DEDUCTIONS Total:	1,841.38	12,889.66

EMPLOYER PAID BENEFITS	Amount	YTD
ASRS Alternative Contribution Rate	188.00	1,316.00
FICA - MEDICARE	26.70	186.90
FICA - SOC SEC	114.17	799.19
BENEFITS Total:	328.87	2,302.09

Valentine Elementary
12491 N Byers
HC 35 Box 50
Peach Springs, AZ 86434

DIRECT DEPOSIT RECEIPT

PAYROLL
PAY DATE: 04/23/2021

DIRECT DEPOSIT AMOUNT: *One Thousand Four Hundred Seventy Five and 56/100 Dollars*** **\$1,475.56****

BLOUNT, PAULA J
3834 E LASS AVE
KINGMAN, AZ 86409

NON - NEGOTIABLE

Valentine Elementary

Peach Springs, AZ 86434

BLOUNT, PAULA J	22	BI-WEEKLY	04/17/2021	04/23/2021	4/23/2021
Employee Name	Period	Pay Cycle	End Date	Pay Date	Deposit Date
Federal: Single or Married filing separately, Exe: 1		State: AZ 2.7% of taxable wages			

EARNINGS	Reg Hrs	O/T Hrs	Rate	Amt	Over time	FTD	YTD
Office Manager	0.00	0.00	0.00	1,525.23	0.00	33,555.06	12,201.84
In lieu of Insurance Payment	0.00	0.00	0.00	316.15	0.00	6,955.30	2,529.20
EARNINGS Total:	0.00	0.00		1,841.38		40,510.36	14,731.04

EMPLOYEE DEDUCTIONS	Amount	YTD
FED TAX W/H	175.23	1,401.84
FICA - MEDICARE	26.70	213.60
FICA - SOC SEC	114.17	913.36
STATE TAX W/H	49.72	397.76
DIRECT DEPOSIT SUREPAY	1,475.56	11,804.48
DEDUCTIONS Total:	1,841.38	14,731.04

EMPLOYER PAID BENEFITS	Amount	YTD
ASRS Alternative Contribution Rate	188.00	1,504.00
FICA - MEDICARE	26.70	213.60
FICA - SOC SEC	114.17	913.36
BENEFITS Total:	328.87	2,630.96

P22



ARIZONA STATE RETIREMENT SYSTEM

3300 NORTH CENTRAL AVENUE • PO BOX 33910 • PHOENIX, AZ 85067-3910 • PHONE (602) 240-2000
4400 EAST BROADWAY BOULEVARD • SUITE 200 • TUCSON, AZ 85711-3554 • PHONE (520) 239-3100
TOLL FREE OUTSIDE METRO PHOENIX AND TUCSON 1 (800) 621-3778
EMAIL ADDRESS: ASKYLAC@AZASRS.GOV • WEB ADDRESS: WWW.AZASRS.GOV

Paul Matson
Director

Date: 04/26/2021

Paula Blount
PO Box 6856
Kingman, AZ 86402-6856

RE: Pension Verification

Dear Ms. Blount:

This letter is a verification of your pension benefit with the Arizona State Retirement System (ASRS). The ASRS has the following information currently on record:

Retirement Date: 04/11/2015

Gross Monthly Pension: \$1,574.08

Duration: Lifetime

Please note the Gross Monthly Pension amount may increase in the future due to permanent benefit increases.

If you have further questions you may contact the ASRS Member Advisory Center by secure message through your online account at www.azasrs.gov or by telephone at (602) 240-2000 in Phoenix, (520) 239-3100 in Tucson or toll-free outside metro Phoenix and Tucson at 1-800-621-3778.

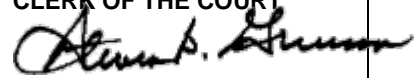
Sincerely,
Member Advisory Center
ARIZONA STATE RETIREMENT SYSTEM

000983

EXHIBIT “KKK”

EXHIBIT “KKK”

EXHIBIT “KKK”



SUPP
WILICK LAW GROUP
MARSHAL S. WILICK, 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 Paula Blount

**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,

vs.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,

Parent(s)/Respondents.

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

DATE OF HEARING: 5/13/2021
TIME OF HEARING: 1:30 P.M.

**SUPPLEMENTAL EXHIBIT TO PETITIONER, PAUL BLOUNT'S
MOTION FOR AN ORDER TO SHOW CAUSE AS TO WHY
RESPONDENT, JUSTIN BLOUNT, SHOULD NOT BE HELD IN
CONTEMPT, FOR MONETARY SANCTIONS, AND FOR
ATTORNEY' FEES AND COSTS**

Petitioner, Paula Blount, by and through her attorneys of the WILICK LAW
GROUP, hereby submits the following supplemental exhibit to her *Motion* filed March

1 19, 2021:

2 **Exhibit 1:** Phone Records, Event Cards, E-mails establishing Paula's attempts
3 at effectuating visitation and Eyewitness Statement concerning
4 Paula's brief interaction with Justin, Bates Stamp Nos. PB000001-
5 PB000015.

6 **DATED** this 12th day of May, 2021.

7 WILLOCK LAW GROUP

8 */s/ Trevor M. Creel*

9
10 MARSHAL S. WILLOCK, ESQ.
Nevada Bar No. 2515
11 TREVOR M. CREEL, ESQ.
Nevada Bar No. 11943
3591 E. Bonanza Road Suite 200
12 Las Vegas, Nevada 89110-2101
(702) 438-4100; Fax (702) 438-5311
13 Attorney for Paula Blount
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the WILICK LAW GROUP and that on this 12th day of May, 2021, I caused the above and foregoing entitled document, to be served as follows:

- [X] 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 Affidavit of Service.

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

Trevor R. Waite, Esq.
Alverson Taylor & Sanders
6605 Grand Montecito Parkway, Ste. 200
Las Vegas, Nevada 89149
Twaite@AlversonTaylor.com
Attorneys for Father/Respondent

/s/ *Victoria Javiel*
An Employee of the WILICK LAW GROUP

P:\wp19\BLOUNT,P\DRAFTS\00499065.WPD\VJ

9:22

5G

History

4/2/21

Today 3:29 PM

Outgoing call, 13 mins 7 sec

Today 3:28 PM

Outgoing call, 0 mins 31 sec

Mar 19 3:20 PM

Outgoing call, 13 mins 35 sec

Mar 5 4:36 PM

Outgoing call, 2 mins 45 sec

Az time

Feb 19 4:37 PM

Outgoing call, 4 mins 15 sec

Az time

Feb 5 4:49 PM

Outgoing call, 21 mins 54 sec

Az Time

Jan 22 4:38 PM

Outgoing call, 2 mins 53 sec

Az Time

Jan 22 4:36 PM

Outgoing call, 1 min 16 secs

Az Time

Jan 15 4:16 PM

Outgoing call, 5 mins 23 sec

Az Time



Add



Share

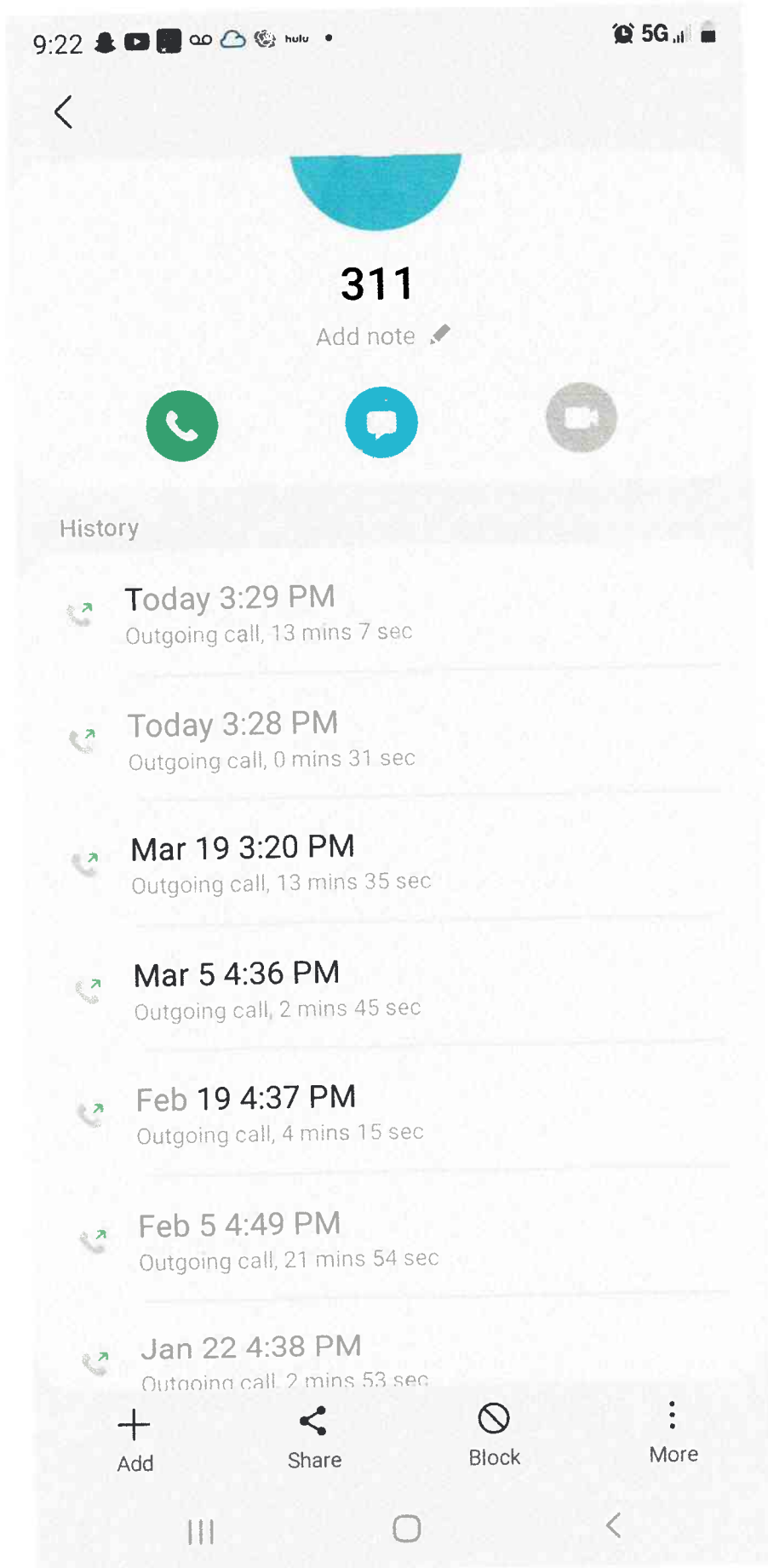


Block



More





Az time

Az time

Az time

Az time

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



<input type="checkbox"/> Apt. Notification <input type="checkbox"/> Garage Door <input type="checkbox"/> Curfew Notification <input type="checkbox"/> Other		<input type="checkbox"/> Disturbance <input type="checkbox"/> Drug Activity <input type="checkbox"/> Theft <input type="checkbox"/> Vandalism		<input type="checkbox"/> Trespassing <input type="checkbox"/> Domestic Violence <input checked="" type="checkbox"/> Civil Stand-by	
Address 2637 VEGAS VALLEY		Event # LLV201100024327			
Apt. Name		Message OFFICERS RESPONDED TO CALL OF CIVIL STAND-BY. PR HAD COURT PAPERS OF CUSTODY ADVERSE PARTY NOT IN COMPLIANCE. REPORT TAKEN			
Date 11-6-20	Time 1715	Officer Name M. MARDONE	P# 17754		
LVMPD 275 (REV. 10-14) DISTRIBUTION: WHITE - SUBSTATION CARDSTOCK - CITIZEN					

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



<input type="checkbox"/> Apt. Notification <input type="checkbox"/> Garage Door <input type="checkbox"/> Curfew Notification <input type="checkbox"/> Other		<input type="checkbox"/> Disturbance <input type="checkbox"/> Drug Activity <input type="checkbox"/> Theft <input type="checkbox"/> Vandalism		<input type="checkbox"/> Trespassing <input type="checkbox"/> Domestic Violence <input checked="" type="checkbox"/> Civil Stand-by	
Address 2637 VEGAS VALLEY		Event # LLV201200016936			
Apt. Name		Message OFFICERS RESPONDED TO CONDUCT A CIVIL STAND-BY FOR A CUSTODY EXCHANGE - NO EXCHANGE WAS DONE. BOTH PARTIES ADVISED COURT DATE ON 01/12/21			
Date 11/11/20	Time 1600	Officer Name K. Y. MARTINE	P# 118839		

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☒ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by

Address: 637 VEGAS VALLEY DR LLV201200076817

Apt. Name: Message: REFERENCED

ABOVE EVENT NUMBER. ABOUT
CHILD CUSTODY

Date: 12/18/07 Time: 1607 Officer Name: D. VO P#: 18491

LVMPD 275 (REV. 10-14) DISTRIBUTION: WHITE - SUBSTATION CARDSTOCK - CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☒ Civil Stand-by

Address: 2837 VEGAS VALLEY LLV201200107566

Apt. Name: Message: CONTACTED REFERENCE

CHILD CUSTODY DISPUTE FATHER REFUSED
CUSTODY EXCHANGE

Date: 12/14/07 Time: 1806 Officer Name: W. FRADA P#: 15759

LVMPD 275 (REV. 10-14) DISTRIBUTION: WHITE - SUBSTATION CARDSTOCK - CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☒ Civil Stand-by
- ☐

Address 7137 VEGAS VALLEY		Event # LLV210100067027	
Apt. Name RESIDENCE		Message CUSTODY EXCHANGE	
BETWEEN FATHER AND GRANDMA OF 2 CHILDREN. LAST VISIT EXCH. WITH ALTERNATING WEEKENDS			
Date 1/15/21	Time 1141	Officer Name R. ADELSON	P# 18236

LVMPD 275 (REV. 10-14) DISTRIBUTION: WHITE - SUBSTATION CARDSTOCK - CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☒ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☒ Civil Stand-by
- ☐

Address 2637 VEGAS VALLEY		Event # LLV210100098968	
Apt. Name		Message PAULA BLOUNT REQUESTED POLICE STANBY	
FOR CUSTODY EXCHANGE OF GRAND KIDS. OTHER PARTY JUSTIN BLOUNT OR ANYONE WAS AT RESIDENCE			
Date 1/22/21	Time 1615	Officer Name MCINTOSH	P# 15714

LVMPD 275 (REV. 10-14) DISTRIBUTION: WHITE - SUBSTATION CARDSTOCK - CITIZEN

000992

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by
- ☐ Other

Address: 2637 VEGAS VALLEY DR
Event #: 210200083579

Apt. Name: _____ Message: LINDA RESPONDED

FOR A CUSTODY EXCHANGE AT WHICH CHILDREN WERE NOT EXCHANGED

Date: 2/19/21 Time: 1815 Officer Name: J. VALU P#: 16787

LVMPO 275 (REV. 10-14) DISTRIBUTION: WHITE • SUBSTATION CARDSTOCK • CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☒ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by
- ☐ Other

Address: 2637 VEGAS VALLEY DR
Event #: LLV 210200083579

Apt. Name: _____ Message: CUSTODY EXCHANGE PR

HAS COURT ORDER IN HAND. PARENTS REFUSE TO EXCHANGE CUSTODY

Date: 2/19/21 Time: 1815 Officer Name: R. VALU P#: 16813

LVMPO 275 (REV. 10-14) DISTRIBUTION: WHITE • SUBSTATION CARDSTOCK • CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☒ Civil Stand-by

Address

LAS VEGAS NV

Event #

Apt. Name

Message

LLV 210400007077

PAULA, BLOWN BY CAR TO

BACK UP KAYOL BLOWN FROM SADD BRESTORCE HOSPITAL

WAS IN THE HOSPITAL PAULA STATED SHE WAS CARRYING

OF CHILDREN AND PI WALKER BRILLIANT

Date

Time

Officer Name

P#

4/2/21

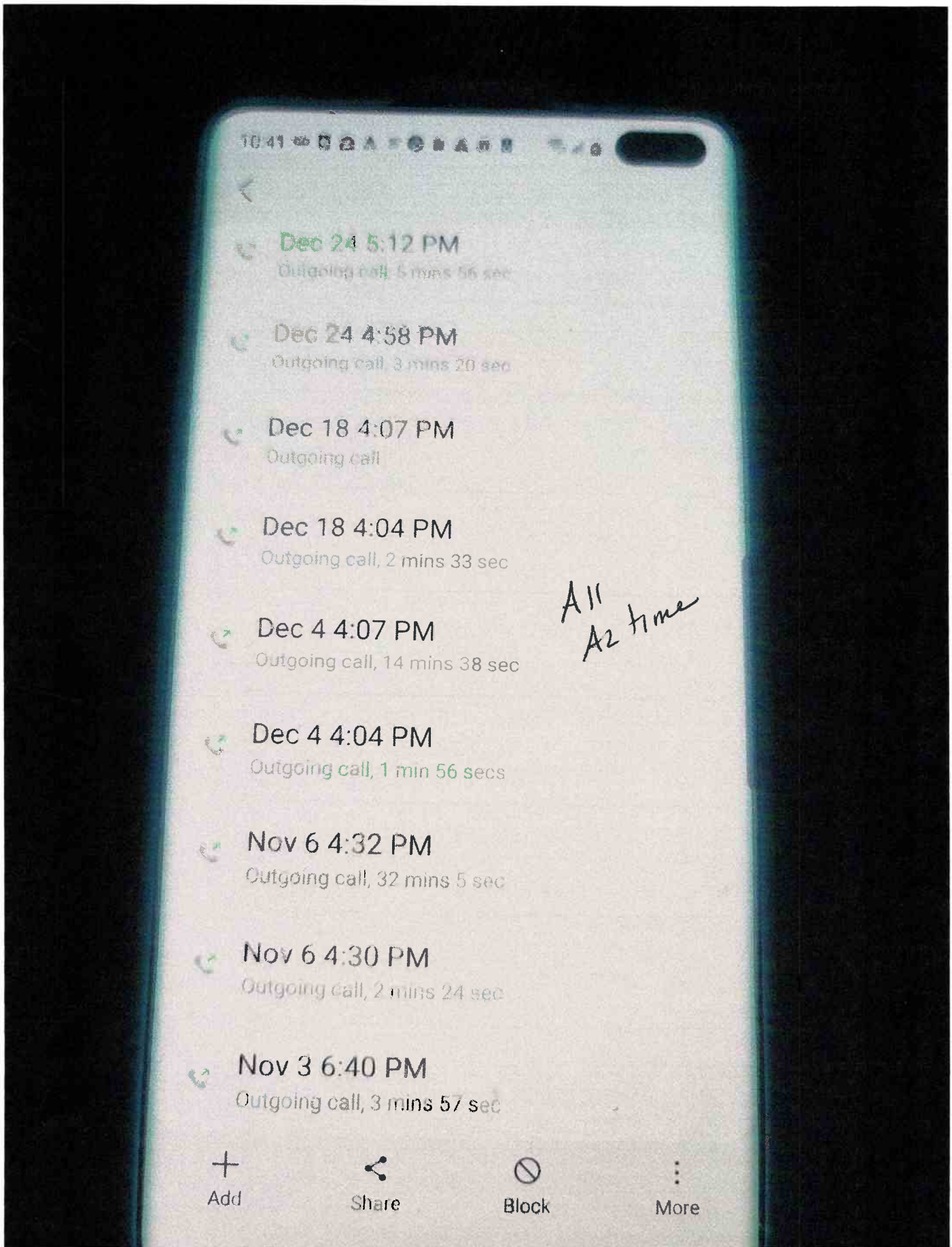
1732

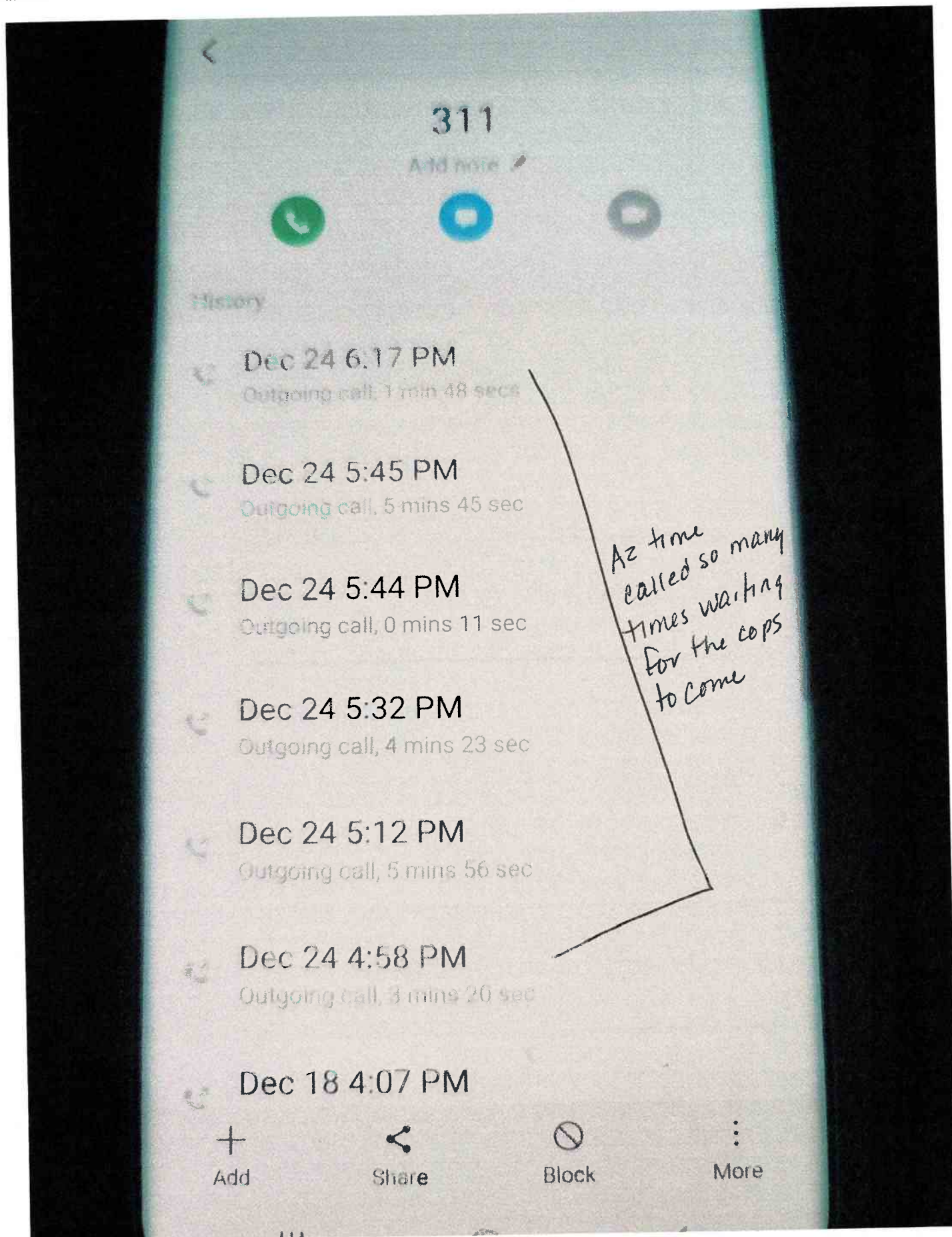
J. VASQUEZ

18094

LVM 275 (REV. 10-14)

DISTRIBUTION: WHITE • SUBSTATION CARDSTOCK • CITIZEN





Trevor Creel <trevor@willicklawgroup.com>

Jan 8, 2021,
10:33 AM

to me, Victoria

Paula,

Your next visit with the children is scheduled for January 15th by my count.



paula blount <kingmanpaula@gmail.com>

3-5-21 visitation

Justin Blount <justincblount1@gmail.com>
To: paula blount <kingmanpaula@gmail.com>

Fri, Mar 5, 2021 at 3:55 PM

Thank you for emailing so that we have a current email for you. We are reaching out to advise you there is currently a CPS hold on visitation.



paula blount <kingmanpaula@gmail.com>

March 19 2021 visit

Justin Blount <justincblount1@gmail.com>
To: paula blount <kingmanpaula@gmail.com>

Fri, Mar 19, 2021 at 10:42 AM

We are reaching out to advise you there is still currently a CPS hold on visitation. If the status changes we will let you know

5/21/21

Paula Blount went up to the counter and waited for Justin Blount to finish waiting on a customer she put her hands out to give him a hug and he walked away and so did Paula

Thomas J. Reed

EXHIBIT “LLL”

EXHIBIT “LLL”

EXHIBIT “LLL”

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Registration of Foreign Custody**COURT MINUTES****May 13, 2021**

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

May 13, 2021 01:30 PM All Pending Motions

HEARD BY: Butler, Dee Smart **COURTROOM:** Courtroom 05

COURT CLERK: Ratcliff, Ameiona

PARTIES PRESENT:**Paula Blount, Plaintiff, Present****Trevor Creel, Attorney, Present****Justin Blount, Defendant, Present****Daniel A. Mann, ESQ, Attorney, Present****Jeremiah Blount, Subject Minor, Not Present****Pro Se****Kaydi Blount, Subject Minor, Not Present****Pro Se****GRETCHEN WHATONAME, Respondent, Not Present****Pro Se****Stephanie Blount, Guardian, Not Present****Pro Se****JOURNAL ENTRIES**

MOTION: RESPONDENT'S MOTION TO RETAX PLAINTIFF S MEMORANDUM OF COSTS
 OPPOSITION: RESPONDENT'S OPPOSITION TO PETITIONER, PAULA BLOUNT'S MOTION
 FOR AN ORDER TO SHOW CAUSE AS TO WHY RESPONDENT, JUSTIN BLOUNT, SHOULD
 NOT BE HELD IN CONTEMPT FOR MONETARY SANCTIONS AND FOR ATTORNEY'S FEES
 AND COSTS MOTION: PETITIONER, PAULA BLOUNT'S MOTION FOR AN ORDER TO SHOW
 CAUSE AS TO WHY RESPONDENT, JUSTIN BLOUNT, SHOULD NOT BE HELD IN CONTEMPT,
 FOR MONETARY SANCTIONS, AND FOR ATTORNEY'S FEES AND COSTS

The Defendant/Dad sworn-in and testimony.

In the interest of public safety due to the Coronavirus pandemic and the directive of Governor
 Sisolak, all parties were present via VIDEO CONFERENCE through the BlueJeans application.

Mr. Mann argued the attorney's fees and charges from opposing Counsel is excessive. Mr. Creel
 stated with the amount of the experience and time at which he has been practicing warrants his fees.
 Mr. Creel further stated it is absurd for Counsel to argue the cost being excessive.

Court FINDS the fees charged by Mr. Creel is appropriate, THEREFORE the MOTION TO RETAX is
 DENIED.

Court FURTHER FINDS Jeremiah placement was COURT ORDERED, therefore that puts the Court
 at a disadvantage.

Mr. Mann stated currently Jeremiah has been placed in a mental health facility in Missouri for four (4)
 months which is known as residential care. Mr. Mann further advised the Plaintiff/Paula has reached
 out to the facility to obtain information about Jeremiah's conditions, which is inappropriate at this time

when the children are not in Paula's care as well as the severity of the situation.

Mr. Creel stated Paula has joint custody therefore, the Defendant/Dad is in contempt of the court's order. Mr. Creel further argued it is absurd for opposing counsel to ask if Paula should be privileged to information about the minor children when Paula has been awarded joint custody. Mr. Creel further argued it is quite interesting that the minor children reference Paula as the "mean people", furthermore per Paula, Dad has referenced her as "mean" prior to the biological mother's demise.

Colloquy regarding Jeremiah being institutionalized in Missouri.

Court stated it is interesting that Paula is continuously pushing for visitation when it is clear through exhibits provided, the children have made concerning threats against her. Paula despite the children negative demeanor still asserts she wants her "time" with the children. Court FINDS there has been no commentary from the Plaintiff's side with regard to the children mental health or the children concerns of being abducted by the tribe. Court FINDS Dad is not obeying the Orders, however Dad represented it is due to threats coming from the children toward Paula.

COURT NOTED, through argument and exhibits it is FOUND the children are refusing to visit Paula. COURT FURTHER NOTED, Katie is also attending therapy and has made violent threats toward Paula.

IT IS HEREBY ORDERED, the Motion for Contempt is DENIED.

IT IS FURTHER ORDERED, the request for the children to be turned over to Paula is DENIED.

IT IS FURTHER ORDERED, the Child Protective Service (CPS) records shall be ordered.

IT IS FURTHER ORDERED, the THERAPIST REPORT for all the minor children shall be forwarded to the Department.

IT IS FURTHER ORDERED, the Request for ATTORNEY'S FEES and COST is GRANTED to Plaintiff.

IT IS FURTHER ORDERED, an EVIDENTIARY HEARING (Re: Children well-being, mental health and visits being withheld from Paula) is SET for 9/17/2021 at 1:30 p.m.

IT IS FURTHER ORDERED, Mr. Creel shall prepare the Order from today's hearing.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Sep 17, 2021 1:30PM Evidentiary Hearing
Courtroom 05 Butler, Dee Smart

EXHIBIT “MMM”

EXHIBIT “MMM”

EXHIBIT “MMM”

OSC
WILICK LAW GROUP
MARSHAL S. WILICK, 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 Paula Blount

**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,

vs.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,

Parent(s)/Respondents.

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

DATE OF HEARING:
TIME OF HEARING:

ORDER TO SHOW CAUSE

Upon Application of Petitioner, Paula Blount, by and through her attorneys of the WILICK LAW GROUP, and good cause appearing therefor:

It is hereby ordered, adjudged, and decreed that Respondent, Justin Blount, shall personally appear on the 17th day of September, 2021, at the hour of 1:30 ~~A.M.~~/P.M. before Department J of the Eighth Judicial District Court, Family Division, located at 601 North Pecos Road, Las Vegas, Nevada 89101, Courtroom 5, and show cause, if any exists:

1 1. Why he should not be found and held in contempt for his failure to comply
2 with the terms of the *Grandparent Custody and Visitation Order* issued by the
3 Hualapai Tribal Court in Arizona on January 30, 2020, and subsequently registered
4 with this Court on March 18, 2020, which provides, in relevant part:

5 This Court has exercised jurisdiction over these children, who are
6 enrolled members of the Hualapai Tribe, since the original petition for custody
7 was filed by the children's mother on February 26, 201[7]. . . This Court has
8 since continued to exercise jurisdiction over these children.¹

9 On December 9, 2019, the Petitioner filed a Petition for Grandparents
10 Visitation Rights pursuant to Chapter 20 of the Hualapai Law & Order Code
11 The matter was set for a Motion Hearing, and Notice was e-mailed to the
12 Respondent's counsel of record on December 30, 2019, at 1549 hrs. The
13 Clerk reports that there has been no returned e-mail as undeliverable. The
14 Court does not, however, that there are errors in the Notice, specifically the
15 caption is mistakenly captioned as "Waite, Trevor v. Blount,
16 Justin/Whatoname, Gretchen" and the date on the Notice is listed as February
17 26, 2019. It does however, give notice of a Motion Hearing on today's date
18 at 0900 hrs, and Mr. Waite could have contacted the Court to seek
19 clarification.²

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

- 23 a. Every other weekend, beginning on Fridays at 1600hrs (Nevada
24 Time) and ending on Sundays at 1800hrs (Nevada Time),
25 starting on Friday, February 7, 2020, and alternating every other
26 weekend thereafter;
- 27 b. The Months of June and July in every year, beginning on June
28 1, at 1700hrs (Nevada Time) and ending on July 31, at 1800hrs
(Nevada Time);
- c. Christmas breaks in every even-numbered year, beginning on
December 24, Even Year, at 1700hrs (Nevada Time) and ending
on January 3, Odd-Year, at 1800hrs (Nevada Time);
- d. Telephonic Visitation: The Petitioner is awarded telephonic
visitation with the children on:
 - i. Every Wednesday, at 1800hrs (Nevada Time); and
 - ii. Sundays when the Petitioner does not have
custody/visitation with the children, at 1500hrs (Nevada
Time);

¹ *Grandparent Custody and Visitation Order*, filed January 30, 2020, page 1, lines 23-25.

² *Id.*, page 2, lines 1-7.

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 to Show Cause was served via the court's electronic eFile system
13 to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 5/14/2021

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

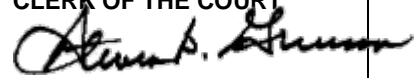
23 Daniel Mann

dmann@alversontaylor.com

EXHIBIT “NNN”

EXHIBIT “NNN”

EXHIBIT “NNN”



NEOJ
WILICK LAW GROUP
MARSHAL S. WILICK, 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 Paula Blount

**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,

vs.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,
Parent(s)/Respondents.

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

DATE OF HEARING: 9/17/2021
TIME OF HEARING: 1:30 P.M.

NOTICE OF ENTRY OF ORDER

TO: JUSTIN BLOUNT, Respondent.

TO: TREVOR WAITE, ESQ. Attorney for Respondent.

PLEASE TAKE NOTICE that the *Order to Show Cause*, was duly entered in

1 the above action on the 14th day of May, 2021, a true and correct copy of which is
2 attached.

3 DATED this 18th day of May, 2021

4 WILICK LAW GROUP

5 */s/ Trevor M. Creel*

6

MARSHAL S. WILICK, ESQ.

7 Nevada Bar No. 2515

8 TREVOR M. CREEL, ESQ.

9 Nevada Bar No. 11943

3591 E. Bonanza Road, Suite 200

10 Las Vegas, NV 89110-2101

(702) 438-4100

11 Attorney for Paula Blount

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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 May, 2021, I caused the above and foregoing entitled document, to be served as follows:

- [X] 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.
- [X] By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada.
- [] Pursuant to EDCR 7.26, to be sent via facsimile, by duly executed consent for service by electronic means.
- [] By hand delivery with signed Affidavit of Service.

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

Trevor R. Waite, Esq.
Daniel Mann, Esq.
Alverson Taylor & Sanders
6605 Grand Montecito Parkway, Ste. 200
Las Vegas, Nevada 89149
Twait@AlversonTaylor.com
Attorneys for Father/Respondent

Candice Fox
2364 Wiki Way
Camp Verde, Arizona 86322
Arizona Counsel for Petitioner, Paula Blount

Stephanie Blount
Justin Blount
PO Box 61521
Las Vegas, Nevada

/s/ *Victoria Javiel*
An Employee of the WILLICK LAW GROUP

P:\wp19\BLOUNT,P\DRAFTS\00499708.WPD\VJ

OSC
WILICK LAW GROUP
MARSHAL S. WILICK, 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 Paula Blount

**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,

vs.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,

Parent(s)/Respondents.

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

DATE OF HEARING:
TIME OF HEARING:

ORDER TO SHOW CAUSE

Upon Application of Petitioner, Paula Blount, by and through her attorneys of the WILICK LAW GROUP, and good cause appearing therefor:

It is hereby ordered, adjudged, and decreed that Respondent, Justin Blount, shall personally appear on the 17th day of September, 2021, at the hour of 1:30 ~~A.M.~~/P.M. before Department J of the Eighth Judicial District Court, Family Division, located at 601 North Pecos Road, Las Vegas, Nevada 89101, Courtroom 5, and show cause, if any exists:

1 1. Why he should not be found and held in contempt for his failure to comply
2 with the terms of the *Grandparent Custody and Visitation Order* issued by the
3 Hualapai Tribal Court in Arizona on January 30, 2020, and subsequently registered
4 with this Court on March 18, 2020, which provides, in relevant part:

5 This Court has exercised jurisdiction over these children, who are
6 enrolled members of the Hualapai Tribe, since the original petition for custody
7 was filed by the children's mother on February 26, 201[7]. . . This Court has
8 since continued to exercise jurisdiction over these children.¹

9 On December 9, 2019, the Petitioner filed a Petition for Grandparents
10 Visitation Rights pursuant to Chapter 20 of the Hualapai Law & Order Code
11 The matter was set for a Motion Hearing, and Notice was e-mailed to the
12 Respondent's counsel of record on December 30, 2019, at 1549 hrs. The
13 Clerk reports that there has been no returned e-mail as undeliverable. The
14 Court does not, however, that there are errors in the Notice, specifically the
15 caption is mistakenly captioned as "Waite, Trevor v. Blount,
16 Justin/Whatoname, Gretchen" and the date on the Notice is listed as February
17 26, 2019. It does however, give notice of a Motion Hearing on today's date
18 at 0900 hrs, and Mr. Waite could have contacted the Court to seek
19 clarification.²

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

- 23 a. Every other weekend, beginning on Fridays at 1600hrs (Nevada
24 Time) and ending on Sundays at 1800hrs (Nevada Time),
25 starting on Friday, February 7, 2020, and alternating every other
26 weekend thereafter;
- 27 b. The Months of June and July in every year, beginning on June
28 1, at 1700hrs (Nevada Time) and ending on July 31, at 1800hrs
(Nevada Time);
- c. Christmas breaks in every even-numbered year, beginning on
December 24, Even Year, at 1700hrs (Nevada Time) and ending
on January 3, Odd-Year, at 1800hrs (Nevada Time);
- d. Telephonic Visitation: The Petitioner is awarded telephonic
visitation with the children on:
- i. Every Wednesday, at 1800hrs (Nevada Time); and
- ii. Sundays when the Petitioner does not have
custody/visitation with the children, at 1500hrs (Nevada
Time);

¹ *Grandparent Custody and Visitation Order*, filed January 30, 2020, page 1, lines 23-25.

² *Id.*, page 2, lines 1-7.

- 001015

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 to Show Cause was served via the court's electronic eFile system
13 to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 5/14/2021

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

23 Daniel Mann

dmann@alversontaylor.com

EXHIBIT “000”

EXHIBIT “000”

EXHIBIT “000”

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

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

Case No.: D-20-605933-F
Department J
Trial Date: September 17, 2021
Trial Time: 1:30 p.m.

TRIAL MANAGEMENT ORDER

TO COUNSEL AND LITIGANTS IN PROPER PERSON: This Order sets forth critical dates and times for the Trial scheduled in this case. It is the responsibility of the attorneys for the litigants or the self-represented litigants to meet the deadlines and to appear for the following required proceedings.

IT IS HEREBY ORDERED:

- a. Current Financial Disclosure Form: Must be filed and served ten (10) days before Trial. Must have three (3) most recent paycheck stubs attached;
- b. Pre-Trial Memorandum, Final Witness List and List of proposed Trial Exhibits (NOT THE EXHIBITS) must be filed and served ten (10) days before Trial. The Pre-Trial Memorandum must conform with EDCR 5.524;
- c. Meet and Confer: litigants and/or counsel must meet no later than five (5) calendar days before trial to arrive at stipulations regarding the admissibility and exchange of proposed exhibits, and the names and addresses of all potential witnesses to be called at trial pursuant to EDCR 5.524. NO NEW WITNESSES OR EXHIBITS MAY BE ADDED after five (5) calendar days before trial.

IT IS FURTHER ORDERED that Counsel or self-represented litigants are to provide copies of proposed Exhibits, marked, tabbed and organized in a three-ringed binder are due to the Court no later than five (5) days prior to Trial.

1 Plaintiffs shall mark their proposed Exhibits by numbers; Defendants shall
2 mark their proposed Exhibits by letters. In addition, each page of the proposed
3 exhibits shall be sequentially numbered. Failure to provide the foregoing may
4 result in such exhibits or evidence being excluded or other appropriate court-
imposed sanctions against counsel or self-represented litigant.

5 IT IS FURTHER HEREBY ORDERED that failure by counsel or
6 litigants to meet the requirements of EDCR 5.524, the above deadlines, or
7 failure to appear as required by this Order may result in sanctions, and the party
8 or attorney may be required to pay reasonable expenses and attorneys' fees
9 incurred due to noncompliance with this Order, (see NRCP 37(b)(2)(B), (C),
(D), NRCP 16.2(b)(2)(i) and 16.2(b)(2)(ii)).

10 IT IS FURTHER ORDERED that this case will be tried in such order as
11 the Court directs. Requests for continuances shall be in writing and served
12 upon opposing counsel or self-represented party, and a hearing shall be held on
13 the merits at least TEN (10) days prior to the time of trial. Sanctions may be
14 imposed if undue delay is exercised in bringing motions to continue or any
15 other action that will disturb the trial date. For good cause shown, where both
16 counsel or parties stipulate, and where the Court does not disagree, the Court
has the discretion to grant an oral request for a continuance.

17 IT IS HEREBY FURTHER ORDERED that the Discovery deadline
18 shall be twenty (20) days prior to the Trial date, unless stipulated in writing
19 otherwise. No objections to authenticity or genuineness of documents will be
20 allowed at trial unless preserved under NRCP 16.2(b)(2)(vii).

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IT IS HEREBY FURTHER ORDERED that if this case is settled during the pendency of this action, counsel or self-represented parties shall exercise due diligence in advising the department and the clerk by providing a Stipulation and Order to that effect, so that any future hearing dates can be vacated.

Dated this 18th day of May, 2021

Dee Smart Butler

59A 854 B485 717A
Dee Smart Butler
District Court Judge

Dee Smart Butler, District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that on the above file stamped date:

☒ I have e-served pursuant to NEFCR 9 and or mailed, via first-class mail, postage fully prepaid the foregoing TRIAL MANAGEMENT ORDER to:

Paula Blount
3834 E Lass Avenue
Kingman AZ 86409
Justin Blount
100 N Wallace Drive
Building 12 Aparment 156
Las Vegas NV 89107
Jeremiah Blount
No Known Address
Kaydi Blount
No Known Address
GRETCHEN WHATONAME
No Known Address
Marshal Shawn Willick
3591 E Bonanza Rd Suite 200
Las Vegas NV 89110
Kurt R Bonds
Alverson Taylor & Sanders
Attn Kurt R Bonds
6605 Grand Montecito Pkwy Suite 200
Las Vegas NV 89149
Stephanie Blount
2637 Vegas Valley DR
Las Vegas NV 89121
Trevor Creel
3591 E Bonanza Road
Las Vegas NV 89110
Daniel A Mann ESQ
6605 Grand Montecito PKWY STE 200
Las Vegas NV 89149

/s/ Roxana Valladares

Roxana Valladares
Judicial Executive Assistant, Dept. J

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 Trial Management Order was served via the court's electronic eFile
13 system to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 5/18/2021

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

23 Daniel Mann

dmann@alversontaylor.com

24
25
26 If indicated below, a copy of the above mentioned filings were also served by mail
27 via United States Postal Service, postage prepaid, to the parties listed below at their last
28 known addresses on 5/19/2021

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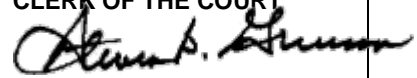
Stephanie Blount

2637 Vegas Valley DR
Las Vegas, NV, 89121

EXHIBIT “PPP”

EXHIBIT “PPP”

EXHIBIT “PPP”



MEMO
WILICK LAW GROUP
MARSHAL S. WILICK, 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 Paula Blount

**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,

vs.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,

Parent(s)/Respondents.

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

DATE OF HEARING: 5/13/2021
TIME OF HEARING: 1:30 P.M.

**GRANDMOTHER/PETITIONER, PAULA BLOUNT'S
MEMORANDUM OF FEES AND COSTS**

This *Memorandum of Fees and Costs* in the above referenced case is provided to the Court indicating fees and costs expended by the Petitioner, Paula Blount, from January 11, 2021, through May 13, 2021, regarding her opposition to Respondent, Justin Blount's *Motion to Retax Plaintiff's Memorandum of Costs*, filed January 22, 2021 (highlighted as to all relevant time entries and costs).

I. FEES AND COSTS INCURRED

1. Trevor M. Creel, Esq., is an Associate Attorney for the WILICK LAW GROUP and has produced this *Memorandum of Fees and Costs*.

2. Paula's billing records in the above referenced case from January 11, 2021, through May 17, 2021, reflect the following time entries for WILICK LAW GROUP staff regarding *Respondent's Motion to Retax Plaintiff's Memorandum of Costs*, a detailed summary of which is attached as **Exhibit "A"**:

Paralegal time:	1.5	@	\$175.00	\$262.50
Paralegal Non-billable	0.4	@	\$0.00	\$0.00
Associate time:	5	@	\$400.00	\$2,000.00
Mr. Willick's time:	0.4	@	\$600.00	\$240.00
Mr. Willick's non-billable time:	0.4	@	\$0.00	\$0.00
TOTAL SERVICES	7.7			\$2,502.50

3. Total Hours Expended (for subject referenced): 7.7 hours

4. Total Costs (for dates/subject referenced): \$3.50

5. Total Fees, Costs, and Interest: \$2,506.00

II. LIMITED LEGAL ARGUMENT

The fees requested are reasonable pursuant to NRS 18.010 and the Court has already determined that Paula was the prevailing party in this matter pursuant to NRS 18.010(2) by denying Justin's *Motion to Retax Plaintiff's Memorandum of Costs*.

With specific reference to Family Law matters, the Supreme Court has identified "well-known basic elements," which in addition to hourly time schedules kept by the attorney, are to be considered in determining the reasonable value of an attorney's services qualities, commonly referred to as the *Brunzell* factors:¹

1. *The Qualities of the Advocate*: his ability, his training, education, experience, professional standing and skill.

¹ *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

1 2. *The Character of the Work to Be Done:* its difficulty, its
2 intricacy, its importance, time and skill required, the responsibility imposed
3 and the prominence and character of the parties where they affect the
4 importance of the litigation.

5 3. *The Work Actually Performed by the Lawyer:* the skill, time and
6 attention given to the work.

7 4. *The Result:* whether the attorney was successful and what
8 benefits were derived.

9 Each of these factors should be given consideration, and no one element should
10 predominate or be given undue weight.² Additional guidance is provided by reviewing
11 the “attorney’s fees” cases most often cited in Family Law.³

12 The *Brunzell* factors require counsel to make a representation as to the “qualities
13 of the advocate,” the character and difficulty of the work performed, and the work
14 actually performed by the attorney.

15 First, respectfully, we suggest that supervising counsel, Marshal S. Willick, Esq.,
16 is A/V rated, a peer-reviewed and certified (and re-certified) Fellow of the American
17 Academy of Matrimonial Lawyers, and a Certified Specialist in Family Law.⁴

18 Trevor M. Creel, Esq., the attorney primarily responsible for litigating this case,
19 has practiced exclusively in the field of family law for over ten years under the direct
20 tutelage of supervising counsel, and has substantial experience dealing with complex
21 custody and grandparent visitation cases.

22 The fees charged by paralegal staff are reasonable, and compensable, as well.
23 The tasks performed by staff in this case were precisely those that were “some of the

24 ² *Miller v. Wilfong*, 121 Nev. 119, P.3d 727 (2005).

25 ³ Discretionary Awards: Awards of fees are neither automatic nor compulsory, but within
26 the sound discretion of the Court, and evidence must support the request. *Fletcher v. Fletcher*, 89
27 Nev. 540, 516 P.2d 103 (1973), *Levy v. Levy*, 96 Nev. 902, 620 P.2d 860 (1980), *Hybarger v.*
28 *Hybarger*, 103 Nev. 255, 737 P.2d 889 (1987).

⁴ Per direct enactment of the Board of Governors of the Nevada State Bar, and independently
by the National Board of Trial Advocacy. Mr. Willick was privileged (and tasked) by the Bar to write
the examination that other would-be Nevada Family Law Specialists must pass to attain that status.

1 work that the attorney would have to do anyway [performed] at substantially less cost
2 per hour.”⁵ As the Court reasoned, “the use of paralegals and other nonattorney staff
3 reduces litigation costs, so long as they are billed at a lower rate,” so “reasonable
4 attorney’s fees’ . . . includes charges for persons such as paralegals and law clerks.”

5 Victoria Javiel, a paralegal with the WILICK LAW GROUP, was the primary
6 paralegal assigned to this case. Victoria earned a Certificate of Achievement in
7 paralegal studies in 2009. She has been a paralegal for a total of eighteen years,
8 assisting attorneys in several aspects of the law. Her skill and experience exceeds that
9 which is expected of a paralegals practicing in Nevada.

10 The work actually performed is detailed in the *Statement of Account for Services*
11 *Rendered Through May 18, 2021*, attached as Exhibit “A” (redacted as to confidential
12 information), consistent with the requirements under *Love*.⁶

13 Finally, as evidenced by the Court’s findings and orders issued on May 13, 2021,
14 the work performed by Paula’s attorneys was successful and resulted in the denial of
15 Justin’s requested relief.

16 A proposed *Order Awarding Attorney’s Fees and Costs* has been attached as
17 Exhibit “B”. We respectfully request that Paula receive an award of her actual
18 attorney’s fees and costs.

19 *****

20 *****

21 *****

22 *****

23 24 **III. CONCLUSION**

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27 ⁵ *LVMPD v. Yeghiazarian*, 129 Nev. 760, 312 P.3d 503 (2013) citing to *Missouri v. Jenkins*,
491 U.S. 274 (1989).

28 ⁶ *Love v. Love*, 114 Nev. 572, 959 P.2d 523 (1998).

1 Based on the foregoing, Paula requests that the court order payment of fees and
2 costs in the amount of \$2,506, with said amount to be reduced to judgment and made
3 collectible by any and all lawful means.

4 **DATED** this 24th day of May, 2021.

5 Respectfully Submitted By:
6 WILLYCK LAW GROUP

7 */s/ Trevor M. Creel*

8 MARSHAL S. WILLYCK, ESQ.
9 Nevada Bar No. 2515
10 TREVOR M. CREEL, ESQ.
11 Nevada Bar. 11943
12 3591 East Bonanza Road, Suite 200
13 Las Vegas, Nevada 89110-2101
14 Attorneys for Paula Blount
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DECLARATION OF ATTORNEY

1. I, Trevor M. Creel, Esq., declare that I am competent to testify to the facts contained in the preceding filing.

2. I am an attorney duly licensed to practice law in the State of Nevada, I am employed by the WILICK LAW GROUP, and I am one of the attorneys representing the Petitioner, Paula Blount.

3. I have personal knowledge of the above costs and disbursements expended, and the items contained in the above *Memorandum* are true and correct to the best of my knowledge and belief. In addition, said disbursements have been necessarily incurred and paid in this action.

4. A complete recitation of the *Brunzell* factors is provided above and is incorporated in this declaration in full.

I declare under penalty of perjury, under the laws of the State of Nevada and the United States (NRS 53.045 and 28 U.S.C. § 1746), that the foregoing is true and correct.

EXECUTED this 24th day of May, 2021.

/s/ Trevor M. Creel

TREVOR M. CREEL, ESQ.

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that on this 24th day of May, 2021, I caused the foregoing document entitled *Memorandum of Fees and Costs* 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.
- ☐ Pursuant to NRCP 5(b)(2)(D), by email by duly executed consent for service by electronic means.
- ☐ By hand delivery with signed Receipt of Copy.
- ☐ By First Class, Certified U.S. Mail.

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

Trevor Waite, Esq.
ALVERSON TAYLOR & SANDERS
6605 Grand Montecito Pkwy., Suite 200
Las Vegas, NV 89149
Twaite@AlversonTaylor.com
Attorney for Justin Blount

/s/ *Victoria Javiel*
An Employee of the WILICK LAW GROUP

P:\wp19\BLOUNT,P\DRAFTS\00500145.WPD/vj

EXHIBIT “A”

EXHIBIT “A”

EXHIBIT “A”

Willick Law Group
3591 E. Bonanza Rd., Suite 200
Las Vegas, Nevada 89110-2101
Web page: www.willicklawgroup.com
Billing Q&A faith@willicklawgroup.com

May 18, 2021

Ms. Paula Blount
3834 E. Lass Avenue
Kingman, Arizona 86409
Email: kingmanpaula@gmail.com

File Number: 20-010.UNBMOTION

RE: Blount v Blount, Justin
D-20-605933-F

Statement of Account for Services Rendered Through May 18, 2021

Professional Services

<u>Emp</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
------------	--------------------	--------------	---------------

Monday, January 11, 2021

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Tuesday, January 12, 2021

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<u>Emp</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
Wednesday, January 13, 2021			
[REDACTED]			
Thursday, January 14, 2021			
[REDACTED]			
Friday, January 15, 2021			
[REDACTED]			
Monday, January 18, 2021			
[REDACTED]			
Tuesday, January 19, 2021			
[REDACTED]			
Wednesday, January 20, 2021			
[REDACTED]			
Thursday, January 21, 2021			
[REDACTED]			

<u>Emp</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
------------	--------------------	--------------	---------------

Attorney's Fees and redact billing.

Friday, January 22, 2021

Monday, January 25, 2021

VJ	for evaluation NO CHARGE Review Respondents Motion to Retax Plaintiff's Memorandum of Costs, and print for file NO CHARGE	0.10	N/C
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Wednesday, January 27, 2021

Thursday, January 28, 2021

Page four
May 18, 2021
Ms. Paula Blount
Blount v Blount, Justin

<u>Emp</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
Friday, January 29, 2021			
Tuesday, February 2, 2021			
information to Mr. Creel.			
Wednesday, February 3, 2021			
Thursday, February 4, 2021			
Monday, February 8, 2021			
VJ	Draft Opposition to Motion to re-tax and pass to Mr. Creel.	0.50	75.00
Wednesday, February 10, 2021			
Friday, February 12, 2021			
Tuesday, February 16, 2021			

Emp

Description

Hours

Amount

Tuesday, February 23, 2021

Friday, February 26, 2021

TMC	Review and respond to client's email re: [REDACTED] and the next steps moving forward.	0.40	160.00
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Wednesday, March 3, 2021

Friday, March 5, 2021

CHARGE			
TMC	Review e-mail from client and confer with Ms. Javiel.	0.10	40.00

Tuesday, March 9, 2021

VJ	Prepare Opposition cover sheet.	0.10	15.00
VJ	E-sign Certificate of Service and Opposition cover sheet, group together and e-file and e-serve.	0.10	15.00
VJ	Review filed Opposition, and print for file. NO CHARGE	0.10	N/C
VJ	Email JEA courtesy copy of the opposition filed. NO CHARGE	0.10	N/C
TMC	Finalize Opposition to Motion to Retax and pass to Ms. Javier for filing.	1.40	560.00

Wednesday, March 10, 2021

Friday, March 12, 2021

May 18, 2021

Ms. Paula Blount

Blount v Blount, Justin

Description

Amount

Monday, March 15, 2021

Friday, March 19, 2021

Monday, March 22, 2021

Tuesday, March 23, 2021

Wednesday, March 24, 2021

Thursday, March 25, 2021

<u>Emp</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
Friday, March 26, 2021			
Monday, March 29, 2021			
Tuesday, March 30, 2021			
Wednesday, March 31, 2021			
Thursday, April 1, 2021			
Friday, April 2, 2021			

<u>Emp</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
Monday, April 5, 2021			
Wednesday, April 14, 2021			
Friday, April 16, 2021			
Tuesday, April 20, 2021			
TMC	Telephone Conference with client to discuss recent developments and the next steps moving forward.	0.30	120.00
Friday, April 23, 2021			
Monday, April 26, 2021			
Wednesday, April 28, 2021			
Thursday, April 29, 2021			
Monday, May 3, 2021			
VI	Review with client from Paul and Justin regarding this	0.10	N/C

<u>Emp</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
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Wednesday, May 5, 2021

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Thursday, May 6, 2021

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Friday, May 7, 2021

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Summary of Services

MSW	Marshal S. Willick	0.60 hrs	@ 600.00	\$	360.00
MSW	Marshal S. Willick	0.70 hrs	@ 0.00		N/C
TMC	Trevor M. Creel	18.30 hrs	@ 400.00	\$	7,320.00
VJ	Victoria Javiel	5.60 hrs	@ 150.00	\$	840.00
VJ	Victoria Javiel	7.20 hrs	@ 0.00		N/C
VJ	Victoria Javiel	3.40 hrs	@ 175.00	\$	595.00

Total Professional Services

\$ 9,115.00

Costs and Disbursements

<u>Date</u>	<u>Description</u>	<u>Amount</u>
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01/21/21	Efiling of document(s): Grandmother/Petitioner, Paula Blount's Memorandum of Fees and Costs	3.50
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02/03/21	Efiling of document(s): Notice of Entry of Order Awarding Attorney's Fees and Costs	3.50
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<u>Date</u>	<u>Description</u>	<u>Amount</u>
03/09/21	Efiling of document(s): Paternal Grandmother's Opposition to Respondents' Motion to Retax Plaintiff's Memorandum of Costs and Countermotion for Attorney's Fees and Cost	3.50
03/19/21	Efiling of document(s): Motion for an Order to Show Cause	3.50
03/23/21	Efiling of document(s): Ex Parte Application for an Order to Show Cause	3.50
03/23/21	Efiling of document(s): Certificate of Service [Notice of Hearing]	3.50
03/23/21	Clerk of the Court: filing fee from 3.19.21 Motion filing	25.00
03/30/21	Efiling of document(s): Certificate of Service [Notice of Hearing]	3.50
05/07/21	Efiling of document(s): General Financial Disclosure Form	3.50
Total Costs and Disbursements		<u>\$ 56.50</u>

TOTAL NEW CHARGES	<u>\$ 9,171.50</u>
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PAYMENTS AND CREDITS

01/11/21	Applied from Retainer to fee charges	-210.00
01/25/21	Applied from Retainer to fee charges	-2,996.50
01/25/21	Applied from Retainer to cost charges	-3.50
02/10/21	Applied from Retainer to fee charges	-1,853.50
02/10/21	Applied from Retainer to cost charges	-7.00
02/25/21	Applied from Retainer to fee charges	-15.00
03/10/21	Applied from Retainer to fee charges	-805.00
03/10/21	Applied from Retainer to cost charges	-3.50
03/25/21	Applied from Retainer to fee charges	-2,635.00
03/25/21	Applied from Retainer to cost charges	-35.50
04/09/21	Applied from Retainer to fee charges	-365.00
04/09/21	Applied from Retainer to cost charges	-3.50
04/26/21	Applied from Retainer to fee charges	-252.50
05/10/21	Applied from Retainer to fee charges	-192.50
05/10/21	Applied from Retainer to cost charges	-3.50
Total Payments and Credits		<u>\$ -9,381.50</u>

Retainer Account

Retainer Balance Forward		\$ 3,000.00
01/11/21	Applied from Retainer to fee charges	-210.00
01/11/21	Retainer received via credit card per email	210.00
01/25/21	Applied from Retainer to fee charges	-2,996.50
01/25/21	Applied from Retainer to cost charges	-3.50
01/27/21	Retainer received via credit card per email	3,673.50
02/10/21	Applied from Retainer to fee charges	-1,853.50
02/10/21	Applied from Retainer to cost charges	-7.00
02/16/21	Retainer received via credit card using direct link	1,187.00
02/25/21	Applied from Retainer to fee charges	-15.00

Page eleven
May 18, 2021
Ms. Paula Blount
Blount v Blount, Justin

02/25/21	Retainer received via credit card per email	15.00
03/10/21	Applied from Retainer to fee charges	-805.00
03/10/21	Applied from Retainer to cost charges	-3.50
03/10/21	Retainer received via credit card per email	808.50
03/25/21	Applied from Retainer to fee charges	-2,635.00
03/25/21	Applied from Retainer to cost charges	-35.50
03/29/21	Retainer received via credit card per email	2,670.50
04/09/21	Applied from Retainer to fee charges	-365.00
04/09/21	Applied from Retainer to cost charges	-3.50
04/12/21	Retainer received via credit card per email	368.50
04/26/21	Applied from Retainer to fee charges	-252.50
05/10/21	Applied from Retainer to fee charges	-192.50
05/10/21	Applied from Retainer to cost charges	-3.50
05/10/21	Retainer received via credit card per email	<u>448.50</u>

New Retainer Account Balance	\$ 3,000.00
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SUMMARY OF ACCOUNT

Balance Forward	\$ 0.00
Total New Charges	9,171.50
Payments, credits, and/or retainer used	<u>-9,381.50</u>

TOTAL AMOUNT DUE	\$ 0.00
-------------------------	----------------

Ms. Paula Blount
 3834 E. Lass Avenue
 Kingman, Arizona 86409
 Email: kingmanpaula@gmail.com

RE: Blount v Blount, Justin
 D-20-605933-F

Home Phone: (702)
 Business Phone: (702)
 Fax Number: (702)
 Cell Phone: (702)

Email: kingmanpaula@gmail.com
 ORIGINATING ATTY: MSW

Hourly Rate using Rate Schedule 22. Statement Format 1
 Simple interest at APR of 18.00% will be charged on amounts past due 30 days
 Retainer Funds will be applied against all charges
 Client must maintain minimum balance of \$3000.00 in Retainer Account

File Opened 02/14/20. Last Billed 05/10/21 for Activity through 05/10/21
 Last Payment: 05/10/21 - \$196.00

Ref #	Date	Atty	Description	Hours	Rate	Amount
641874						
641879						
641895						
641897						
641900						
642280						
641999						
642000						
642250	05/13/21	MSW	message. Prepare for and attend hearing in Dept. J. (PREPH)	0.40	600	240.00
642252	05/13/21	MSW	Additional time actually expended on this matter, but not charged to Client as directed by Marshal Willick. NO CHARGE (ADT)	0.40		N/C
642287	05/13/21	TMC	Prepare for and attend hearing in Dept. J (Judge	2.80	400	1,120.00

Butler) re: Motion for an Order to Show Cause.
(PREPH)

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642648	05/18/21	VJ	Request billing for Memorandum of Fees and Costs. NO CHARGE	0.10		N/C
642670	05/18/21	VJ	Redact Memorandum of Fees and Costs.	0.40	175	70.00
642671	05/18/21	VJ	Draft Memorandum of Fees and Costs.	0.40	175	70.00
642672	05/18/21	VJ	Draft Order from May 13, 2021 hearing and pass to Mr. Creel.	0.30	175	52.50

Summary of Services

MSW	Marshal S. Willick	0.40 hrs	@ 600.00	\$	240.00
MSW	Marshal S. Willick	0.40 hrs	@ 0.00		N/C
TMC	Trevor M. Creel	3.50 hrs	@ 400.00	\$	1,400.00
VJ	Victoria Javiel	2.00 hrs	@ 0.00		N/C
VJ	Victoria Javiel	2.80 hrs	@ 175.00	\$	490.00

Total Professional Services

9.10

\$ 2,130.00

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Costs and Disbursements

641853	05/12/21	EFIL	Efiling of document(s): Supplemental Exhibit to Petitioner, Paul Blount's Motion for an Order to Show Cause as	3.50
642587	05/18/21	EFIL	Efiling of document(s): Notice of Entry of Order to Show Cause	3.50

Total Costs and Disbursements	\$ 7.00
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TOTAL NEW CHARGES	\$ 2,137.00
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PAYMENTS AND CREDITS

Applied from Retainer to fee charges	-2,130.00
Applied from Retainer to cost charges	-7.00

Total Payments and Credits	\$ -2,137.00
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Retainer Account

Retainer Balance Forward	\$ 2,551.50
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201436	05/10/21	Retainer received via credit card per email	448.50
	05/18/21	Applied from Retainer to fee charges	-2,130.00
	05/18/21	Applied from Retainer to cost charges	-7.00

New Retainer Account Balance	\$ 863.00
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Please remit an additional \$2137.00 to replenish your retainer
account balance

SUMMARY OF ACCOUNT

Balance Forward	\$ 0.00
Total New Charges	2,137.00
Payments, credits, and/or retainer used	-2,137.00
Additional Retainer Due	\$ 2,137.00

TOTAL AMOUNT DUE	\$ 2,137.00
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Total Hours to Date	110.20
Total Fees Case to Date	28,350.00
Total Costs Case to Date	534.25
Total Payments Case to Date	28,884.25

Email addresses: [staff member's first name]@willicklawgroup.com
Be well; stay safe.

EXHIBIT “QQQ”

EXHIBIT “QQQ”

EXHIBIT “QQQ”

ORDR

WILICK LAW GROUP
MARSHAL S. WILICK, 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 Paula Blount

**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,
vs.
JUSTIN BLOUNT,
GRETCHEN WHATONAME,
Parent(s)/Respondents.

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

DATE OF HEARING: 5/13/2021
TIME OF HEARING: 1:30 P.M.

ORDER AWARDING ATTORNEY'S FEES AND COSTS

This matter came on for hearing at the above date and time before the Honorable Dee Smart Butler, District Court Judge, Family Division. Petitioner, Paula Blount, was present audiovisually and represented by and through her attorneys, Marshal S. Willick, Esq., and Trevor M. Creel, Esq., of the WILICK LAW GROUP; Respondent, Justin Blount, was present, and represented by and through his attorney, Daniel Mann, Esq., of ALVERSON TAYLOR & SANDERS; and Stephanie Blount was present audiovisually in Proper Person.

1 Upon its review of the papers and pleadings on file herein, and after entertaining
2 oral argument from the parties, the Court directed Counsel for Paula to file a
3 *Memorandum of Fees and Costs*, as well as a proposed *Order Awarding Attorney's*
4 *Fees and Costs*, leaving a blank for the Court to insert the appropriate amount of fees
5 awarded. Accordingly, the Court issues the following findings and orders.

6
7 **THE COURT HEREBY FINDS:**

8 1. The parties appeared before the Court on May 13, 2021, at which time the
9 Court ordered, of relevance to this attorney's fees order:

10 1. The orders from the Tribal Courts of Hualapai Tribe, Peach
11 Springs, State of Arizona, that have been registered with this Court, shall
stand and be given full faith and credit by this Court.

12 2. Justin's *Motion to Retax Plaintiff's Memorandum of Costs*,
13 filed January 22, 2021, is denied.

14 3. Mr. Creel shall submit a *Memorandum of Fees and Costs*,
15 as well as a proposed Order for attorney's fees and costs, leaving blank
the amount for the Court to insert, which shall be reduced to judgment
and made collectible by any and all lawful means.

16 2. Paula timely filed her *Memorandum of Fees and Costs* (hereinafter
17 "*Memorandum*") on May 24, 2021. Within her *Memorandum*, Paula provided a legal
18 basis for the fees requested by citing to NRS 18.010(2), and she detailed all of the
19 charges she incurred in responding to Justin's *Motion to Retax*.

20 3. Paula's *Memorandum* also included redacted billing statements, attached
21 as Exhibit "A", as well as Trevor M. Creel's *Declaration* verifying both the accuracy
22 of the redacted billing statements and representing that the fees and costs were
23 necessarily incurred.

24 4. Paula's *Memorandum* indicated total fees and costs, excluding interest,
25 of \$2,506.

26 *****

27 *****

28

1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

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: 5/25/2021

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

23 Daniel Mann

dmann@alversontaylor.com

24
25
26 If indicated below, a copy of the above mentioned filings were also served by mail
27 via United States Postal Service, postage prepaid, to the parties listed below at their last
28 known addresses on 5/26/2021

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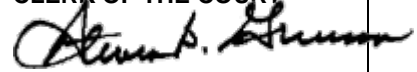
Stephanie Blount

2637 Vegas Valley DR
Las Vegas, NV, 89121

EXHIBIT “RRR”

EXHIBIT “RRR”

EXHIBIT “RRR”



1 **NEOJ**
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 Attorney for Paula Blount

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**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,

vs.

JUSTIN BLOUNT,
GRETCHEN WHATONAME,
Parent(s)/Respondents.

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

DATE OF HEARING:
TIME OF HEARING:

NOTICE OF ENTRY OF ORDER

TO: JUSTIN BLOUNT, Respondent.

TO: DANIEL A. MANN, ESQ. Attorney for Respondent.

PLEASE TAKE NOTICE that the *Order Awarding Attorney's Fees and Costs*,
was duly entered in the above action on the 25th day of May, 2021, a true and correct

1 copy of which is attached.

2 DATED this 13th day of July, 2021

3 WILICK LAW GROUP

4 */s/ Trevor M. Creel*

5 MARSHAL S. WILICK, ESQ.

Nevada Bar No. 2515

6 TREVOR M. CREEL, ESQ.

Nevada Bar No. 11943

7 3591 E. Bonanza Road, Suite 200

8 Las Vegas, NV 89110-2101

(702) 438-4100

Attorney for Paula Blount

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the WILICK LAW GROUP and that on this 13th day of July, 2021, I caused the above and foregoing entitled document *Notice of Entry of Order*, to be served as follows:

- [X] 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 Affidavit of Service.

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

ALVERSON TAYLOR & SANDERS
Daniel A. Mann, Esq.
6605 Grand Montecito Pkwy., Suite 200
Las Vegas, NV 89149
efile@alversontaylor.com
Attorney for Respondent

/s/ *Victoria Javiel*

An Employee of the WILICK LAW GROUP

P:\wp19\BLOUNT,P\DRAFTS\00501213.WPD\VJ

ORDR

WILICK LAW GROUP
MARSHAL S. WILICK, 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 Paula Blount

**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,
vs.
JUSTIN BLOUNT,
GRETCHEN WHATONAME,
Parent(s)/Respondents.

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

DATE OF HEARING: 5/13/2021
TIME OF HEARING: 1:30 P.M.

ORDER AWARDING ATTORNEY'S FEES AND COSTS

This matter came on for hearing at the above date and time before the Honorable Dee Smart Butler, District Court Judge, Family Division. Petitioner, Paula Blount, was present audiovisually and represented by and through her attorneys, Marshal S. Willick, Esq., and Trevor M. Creel, Esq., of the WILICK LAW GROUP; Respondent, Justin Blount, was present, and represented by and through his attorney, Daniel Mann, Esq., of ALVERSON TAYLOR & SANDERS; and Stephanie Blount was present audiovisually in Proper Person.

1 Upon its review of the papers and pleadings on file herein, and after entertaining
2 oral argument from the parties, the Court directed Counsel for Paula to file a
3 *Memorandum of Fees and Costs*, as well as a proposed *Order Awarding Attorney's*
4 *Fees and Costs*, leaving a blank for the Court to insert the appropriate amount of fees
5 awarded. Accordingly, the Court issues the following findings and orders.

6
7 **THE COURT HEREBY FINDS:**

8 1. The parties appeared before the Court on May 13, 2021, at which time the
9 Court ordered, of relevance to this attorney's fees order:

10 1. The orders from the Tribal Courts of Hualapai Tribe, Peach
11 Springs, State of Arizona, that have been registered with this Court, shall
stand and be given full faith and credit by this Court.

12 2. Justin's *Motion to Retax Plaintiff's Memorandum of Costs*,
13 filed January 22, 2021, is denied.

14 3. Mr. Creel shall submit a *Memorandum of Fees and Costs*,
15 as well as a proposed Order for attorney's fees and costs, leaving blank
the amount for the Court to insert, which shall be reduced to judgment
and made collectible by any and all lawful means.

16 2. Paula timely filed her *Memorandum of Fees and Costs* (hereinafter
17 "*Memorandum*") on May 24, 2021. Within her *Memorandum*, Paula provided a legal
18 basis for the fees requested by citing to NRS 18.010(2), and she detailed all of the
19 charges she incurred in responding to Justin's *Motion to Retax*.

20 3. Paula's *Memorandum* also included redacted billing statements, attached
21 as Exhibit "A", as well as Trevor M. Creel's *Declaration* verifying both the accuracy
22 of the redacted billing statements and representing that the fees and costs were
23 necessarily incurred.

24 4. Paula's *Memorandum* indicated total fees and costs, excluding interest,
25 of \$2,506.

26 *****

27 *****

28

5. Pursuant to *Miller v. Wilfong*, 121 Nev. 619, 119 P.3d 727 (2005), Attorney Creel's *Memorandum of Fees and Costs* supported the request for attorney's fees and costs in accordance with *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31 (1969), as the *Memorandum* specifically referenced the qualities of the advocate, the character and difficulty of the work performed, the work actually performed by the WILICK LAW GROUP, and the result obtained.

THE COURT HEREBY ORDERS:

1. Based on the above findings, it is appropriate to award Paula attorney's fees and costs in the amount \$ 2506.00. Said amount is hereby reduced to judgment and made collectible by any and all lawful means.

IT IS SO ORDERED

Dated this 25th day of May, 2021

Dee Smart Butler

12B 962 64BD 8B1B
Dee Smart Butler
District Court Judge

Respectfully Submitted By:

WILICK LAW GROUP

/s/ Trevor M. Creel

MARSHAL S. WILICK, ESQ.

Nevada Bar No. 2515

TREVOR M. CREEL, ESQ.

Nevada Bar No. 11943

3591 E. Bonanza Road, Suite 200

Las Vegas, Nevada 89110-2101

Attorneys for Paula Blount

P:\wp19\BLOUNT,P\DRAFTS\00500150.WPD/vj

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: 5/25/2021

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
23 Daniel Mann	dmann@alversontaylor.com

24
25
26 If indicated below, a copy of the above mentioned filings were also served by mail
27 via United States Postal Service, postage prepaid, to the parties listed below at their last
28 known addresses on 5/26/2021

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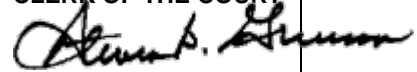
Stephanie Blount

2637 Vegas Valley DR
Las Vegas, NV, 89121

EXHIBIT “SSS”

EXHIBIT “SSS”

EXHIBIT “SSS”



**DISTRICT COURT
CLARK COUNTY, NEVADA**

**PAULA BLOUNT, PLAINTIFF. CASE NO: D-20-605933-F
VS.
JUSTIN BLOUNT, DEPARTMENT J
DEFENDANT.**

NOTICE OF RESCHEDULING OF HEARING

Please be advised that the time of a hearing set before the **Honorable DEE SMART BUTLER** has been changed. The **Evidentiary Hearing**, presently scheduled for **September 17, 2021, at 1:30 PM**, has been rescheduled to the **17th day of September, 2021, at 9:00 AM, Courtroom 05**, Family Courts and Services Center, 601 N. Pecos Rd., Las Vegas, Nevada. **YOUR PRESENCE IS NECESSARY.**

District Judge DEE SMART BUTLER

By: /s/ Roxana Valladares
Roxana Valladares
Judicial Executive Assistant
Department J

CERTIFICATE OF MAILING

I hereby certify that on the above file stamp date:

☒ I e-filed and served, emailed, and/or mailed, via first-class mail, postage fully prepaid, the foregoing NOTICE OF RESCHEDULING HEARING to:

Daniel A. Mann
6605 Grand Montecito PKWY STE 200
Las Vegas, NV 89149

GRETCHEN WHATONAME

Kurt R. Bonds
Alverson Taylor & Sanders
Attn: Kurt R. Bonds
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