

NOA
DAVID MARKMAN, ESQ.
Nevada Bar No. 12440
MARKMAN LAW
4484 S. Pecos Rd Ste. 130
Las Vegas, Nevada 89121
Phone: (702) 843-5899
Fax: (702) 843-6010
Attorneys for Mohamad Alhulabi

Electronically Filed
Nov 19 2020 02:23 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**DISTRICT COURT
CLARK COUNTY, NEVADA**

AHED SAID SENJAB

Plaintiff,

vs.

MOHAMAD ALHULAIBI

Defendants.

CASE NO.: D-20-606093-D
T-20-203688-T

DEPT. NO.: H

DATE OF HEARING: August 4, 2020

TIME OF HEARING: 11:00am

NOTICE OF APPEAL

Notice is hereby given that, Defendant Mohamd Alhulaibi, hereby appeals to the Supreme Court of the State of Nevada from the *Order Denying Relief* entered in this action on the October 14, 2020.

Dated this 12th day of November, 2020.

MARKMAN LAW

By: /s/ DAVID MARKMAN

DAVID MARKMAN, ESQ.
Nevada Bar No. 12440
4484 S. Pecos Rd. #130
Las Vegas, Nevada 89121
(702) 843-5899
Attorneys for Plaintiffs

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of MARKMAN LAW, and that on this
3 12th day of November 2020, I caused the foregoing document entitled Notice of Appeal, to be served as
4 follows:

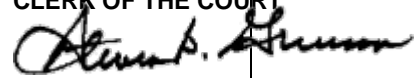
- 5 [X] pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D) and Administrative Order 14-
6 2 captioned "In the Administrative Matter of Mandatory Electronic Service in the Eighth
7 Judicial District Court," by mandatory electronic service through the Eighth Judicial District
Court's electronic filing system;
- 8 [] by placing same to be deposited for mailing in the United States Mail, in a sealed envelope
9 upon which first class postage was prepaid in Las Vegas, Nevada;
- 10 [] pursuant to EDCR 7.26, to be sent via **facsimile**, by duly executed consent for service by
electronic means;
- 11 [] sent out for hand-delivery via Receipt of Copy.

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

14 APRIL GREEN, ESQ.
15 Nevada Bar 8340C
16 BARBARA BUCKLEY
Nevada Bar No. 3918
17 LEGAL AID CENTER OF SOUTHERN NEVADA, INC.
725 E. Charleston Blvd.
18 Las Vegas, NV 89104
asgreen@lacsno.org

19 MARSHALL S. WILICK
20 Nevada Bar No. 2515
Richard L. Crane, Esq
21 Nevada Bar No. 9536
WILICK LAW GROUP
22 3591 East Bonanza Road, Suite 200
Las Vegas Nevada 89110
23 email@willicklawgroup.com

24
25 /s/ David Markman
26 David Markman, Esq.



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DAVID MARKMAN, ESQ.
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4484 S. Pecos Rd Ste. 130
Las Vegas, Nevada 89121
Phone: (702) 843-5899
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Attorneys for Mohamad Alhulabi

**DISTRICT COURT
CLARK COUNTY, NEVADA**

AHED SAID SENJAB

Plaintiff,

vs.

MOHAMAD ALHULAIBI

Defendants.

CASE NO.: D-20-606093-D
T-20-203688-T
DEPT. NO.: H

DATE OF HEARING: August 4, 2020

TIME OF HEARING: 11:00am

CASE APPEAL STATEMENT

1. Name of appellant filing this case appeal statement:

MOHAMAD ALHULAIBI

2. Identify the judge issuing the decision, judgment, or order appealed from:

The Honorable T. Arthur Ritchie

3. Identify each appellant and the name and address of counsel for each appellant:

MOHAMAD ALHULAIBI
c/o DAVID MARKMAN, ESQ.
Nevada Bar No. 12440
4484 S. Pecos Rd. #130
Las Vegas, Nevada 89121
(702) 843-5899
Attorneys for Plaintiffs

1
2 4. Identify each respondent and the name and address of appellate counsel, if known, for
3 each respondent (if the name of a respondent's appellate counsel is unknown, indicate as much
and provide the name and address of that respondent's trial counsel):

4 AHED SENJAB is currently represented by in another appeal:
5 c/o APRIL GREEN, ESQ.
6 Nevada Bar 8340C
BARBARA BUCKLEY
7 Nevada Bar No. 3918
LEGAL AID CENTER OF SOUTHERN NEVADA, INC.
8 725 E. Charleston Blvd.
Las Vegas, NV 89104
asgreen@lacsns.org

9 MARSHALL S. WILICK
10 Nevada Bar No. 2515
Richard L. Crane, Esq
11 Nevada Bar No. 9536
WILICK LAW GROUP
12 3591 East Bonanza Road, Suite 200
Las Vegas Nevada 89110
13 email@willicklawgroup.com
14

15 5. Indicate whether any attorney identified above in response to question 3 or 4 is not licensed
16 to practice law in Nevada and, if so, whether the district court granted that attorney permission to
appear under [SCR 42](#) (attach a copy of any district court order granting such permission):

17 N/A

18 6. Indicate whether appellant was represented by appointed or retained counsel in the district
19 court:

20 N/A

21 7. Indicate whether appellant is represented by appointed or retained counsel on appeal:

22 N/A

23 8. Indicate whether appellant was granted leave to proceed in forma pauperis, and the date
24 of entry of the district court order granting such leave:
25
26
27

Appellant has not previously been granted leave to proceed in forma pauperis. Appellant has retained his counsel through the Nevada Bar's Lawyer Referral service modest means program.

9. Indicate the date the proceedings commenced in the district court (e.g., date complaint, indictment, information, or petition was filed):

Complaint was filed March 24, 2020. Temporary Restraining Order was filed and granted February 14, 2020.

10. Provide a brief description of the nature of the action and result in the district court, including the type of judgment or order being appealed and the relief granted by the district court:

It originated from a divorce that was ultimately dismissed and is currently up on appeal in the fast track briefing as child custody is involved. This appeal is from a motion seeking a return order of the minor child to his home country, the relief requested was denied.

11. Indicate whether the case has previously been the subject of an appeal to or original writ proceeding in the Supreme Court and, if so, the caption and Supreme Court docket number of the prior proceeding:

AHED SAID SENJAB

Appellant,

vs.

MOHAMAD ALHULAIBI

Respondent.

Supreme Court No.: 81515

District Court No.: D-20-606093-D

12. Indicate whether this appeal involves child custody or visitation:

1 The prior appeal involves child custody. This issue tangentially involves custody as it relates to
2 the return of the minor to his home state.

3
4 13. If this is a civil case, indicate whether this appeal involves the possibility of settlement:

5 There is no possibility of settlement.

6 Dated this 12th day of November, 2020.

7 MARKMAN LAW

8
9 By: /s/ DAVID MARKMAN

10 DAVID MARKMAN, ESQ.

11 Nevada Bar No. 12440

12 4484 S. Pecos Rd. #130

13 Las Vegas, Nevada 89121

14 (702) 843-5899

15 Attorneys for Plaintiffs

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of MARKMAN LAW, and that on this
3 12th day of November 2020, I caused the foregoing document entitled Case Appeal Statement, to be
4 served as follows:

- 5 [X] pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D) and Administrative Order 14-
6 2 captioned "In the Administrative Matter of Mandatory Electronic Service in the Eighth
7 Judicial District Court," by mandatory electronic service through the Eighth Judicial District
Court's electronic filing system;
- 8 [] by placing same to be deposited for mailing in the United States Mail, in a sealed envelope
9 upon which first class postage was prepaid in Las Vegas, Nevada;
- 10 [] pursuant to EDCR 7.26, to be sent via **facsimile**, by duly executed consent for service by
electronic means;
- 11 [] sent out for hand-delivery via Receipt of Copy.

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Richard L. Crane, Esq
21 Nevada Bar No. 9536
WILLICK LAW GROUP
22 3591 East Bonanza Road, Suite 200
Las Vegas Nevada 89110
23 email@willicklawgroup.com

24
25 /s/ David Markman
26 David Markman, Esq.

EIGHTH JUDICIAL DISTRICT COURT

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

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

§
§
§
§

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

CASE INFORMATION**Statistical Closures**

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

Case Type: **Divorce - Complaint**Subtype: **Complaint Subject Minor(s)**

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

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





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

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

PARTY INFORMATION

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

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

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












CASE SUMMARY

CASE NO. D-20-606093-D

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

CASE SUMMARY

CASE NO. D-20-606093-D

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

CASE SUMMARY

CASE NO. D-20-606093-D

Notice of Association as Co-Counsel

07/01/2020



Opposition and Countermotion

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

07/02/2020



Financial Disclosure Form

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

07/15/2020



Opposition

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

07/16/2020



Notice of Appeal

Filed By: Plaintiff Senjab, Ahed Said
Notice of Appeal

07/17/2020



Case Appeal Statement

Filed By: Plaintiff Senjab, Ahed Said
Appellant's Case Appeal Statement

07/17/2020



Supplement

Filed by: Plaintiff Senjab, Ahed Said
Supplement of Appellate Counsel Concerning the Pending Cross-Motions, NRS 125D Application, and Stay Request on Appeal

07/21/2020



Transcript of Proceedings

JUNE 16, 20

07/28/2020



Reply

Filed By: Defendant Alhulaibi, Mohamad Abulhakim
Reply in Support of Motion for return Order & Motion to Strike Supplement

08/03/2020



Exhibits

Filed By: Defendant Alhulaibi, Mohamad Abulhakim
Exhibit 1 to Reply in Support of Return Order

08/03/2020



Exhibits

Filed By: Defendant Alhulaibi, Mohamad Abulhakim
Exhibits to Motion to Dissolve and Opposition to Countermotion (translated)

08/04/2020



Notice

Filed By: Plaintiff Senjab, Ahed Said
Notice on Intent to Appear by Telephonic Communications Equipment

08/13/2020



Request Transcript of Proceedings

Party: Plaintiff Senjab, Ahed Said
Request Transcript of Proceedings

08/13/2020



Estimate of Transcript

AUGUST 4, 2020

08/14/2020



Request Transcript of Proceedings

Party: Plaintiff Senjab, Ahed Said
Request Transcript of Proceedings

08/14/2020


















Order


Order Waiving Cost of Transcript for Proceeding (5-20-2020 hearing)

CASE SUMMARY

CASE NO. D-20-606093-D

08/14/2020	 Order <i>Order Waiving Cost of Transcript for Proceeding (8-4-2020 hearing)</i>
08/14/2020	 Estimate of Transcript <i>MAY 20, 2020</i>
08/21/2020	 Transcript of Proceedings <i>AUGUST 4, 2020</i>
08/21/2020	 Final Billing of Transcript <i>AUGUST 4, 2020</i>
08/21/2020	 Certification of Transcripts Notification of Completion <i>AUGUST 4, 2020</i>
08/25/2020	 Receipt of Copy <i>AUGUST 4, 2020</i>
08/28/2020	 Transcript of Proceedings <i>MAY 20, 2020</i>
08/28/2020	 Final Billing of Transcript <i>MAY 20, 2020</i>
08/28/2020	 Certification of Transcripts Notification of Completion <i>MAY 20, 2020</i>
08/31/2020	 Receipt of Copy <i>MAY 20, 2020</i>
10/13/2020	 Order <i>Order Denying Relief</i>
10/14/2020	 Notice of Entry of Order <i>Notice of Entry of Order Denying Relief</i>
10/14/2020	 Certificate of Service
11/12/2020	 Notice of Appeal
11/12/2020	 Case Appeal Statement

HEARINGS

05/20/2020	<p>Motion (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.) 05/20/2020, 06/16/2020 <i>Defendant's Motion to Dismiss for Lack of Jurisdictional Requirements (Cont. from 5/20/2020)</i> Matter Continued; Decision Made; Matter Continued; Decision Made;</p>
05/20/2020	<p>Opposition & Countermotion (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.) 05/20/2020, 06/16/2020 <i>Plt's Opposition To Deft's Motion To Dismiss For Lack Of Jurisdictional Requirements (Cont. from 5/20/2020)</i> Matter Continued; Decision Made; Matter Continued; Decision Made;</p>
05/20/2020	<p> All Pending Motions (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.) Matter Heard; Journal Entry Details: DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTIONAL REQUIREMENTS...PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTIONAL REQUIREMENTS Court interpreter (Arabic), Omar J. Rifad, was present on behalf of the Plaintiff. Both parties,</p>

CASE SUMMARY

CASE NO. D-20-606093-D

Court Interpreter Rifad, Attorney Green, and Attorney Markman appeared telephonically, pursuant to the Administrative Orders for public safety. Court stated it reviewed the papers and pleadings in this case and the TPO case (T-203688-T). Both counsel stated there are no agreements. Court reviewed the history of the case. Court stated it saw no Jurisdiction Enforcement Act Affidavit. Discussion regarding the timeline of when Plaintiff alleges physical presence in Nevada, with intent to make it her home, and non-immigration alien not having a proper domicile and cannot get divorced. Court stated it has jurisdiction to grant the divorce. Further, Nevada Courts are to have subject matter jurisdiction over custody matters. Attorney Markman stated Defendant believes the home of the child is Saudi Arabia, for the reason they were in Saudi Arabia six months prior to the filing. Attorney Green stated Defendant has no intention to return to Saudi Arabia. Court stated Nevada is not the home state and Plaintiff needs to walk through the elements of custody. Attorney Markman stated they never had such intent to stay. Argument regarding people getting divorced all the time, who are not legal, however, reside here. Court noted there is a Protection Order that has been extended to February, 2021 and that Protection Order provided for a split week custody schedule. Attorney Markman stated the abuse allegations have not been substantiated. Further, Defendant admitted it was all verbal, and then alleged physical abuse. Court stated the Protection Order is a valid Order. Court stated it can have temporary, emergency jurisdiction. Attorneys Markman and Green stated there are no other cases and no other action. Attorney Markman stated Defendant was waiting for her brother-in-law to come from the State of Maryland, pick up her and the child, and take them to Maryland. Attorney Markman requested the child be on the ticket to return home with Defendant. Attorney Green stated Attorney Markman's Reply was way beyond the scope of Defendant's Motion. Court stated this case has many layers of analysis for residency of Plaintiff, custody jurisdiction, personal jurisdiction over Defendant, and jurisdiction to grant the divorce. Further, every issue involves legal and factual questions. Court stated it will allow Plaintiff to supplement the Memorandum of law to address each of these issues. COURT ORDERED, the following: Defendant's MOTION and Plaintiff's OPPOSITION shall be CONTINUED. The DEADLINE for the BRIEFS to be FILED is 6/8/2020. The Court will read the cases Attorney Markman cited and Attorney Green's SUPPLEMENT. CONTINUED TO: 6/16/2020 9:00 AM - Regional Justice Center, Courtroom 3G;

06/16/2020



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

Matter Heard;

Journal Entry Details:

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

06/22/2020



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

Decision From 6/16/2020 Hearing

Decision Made; Decision From 6/16/2020 Hearing

Journal Entry Details:

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

08/04/2020

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

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

Denied;

08/04/2020

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

Plaintiff's Reply in Support of Plaintiff's Motion for an Order to Show Cause why Defendant should not be Held

CASE SUMMARY

CASE No. D-20-606093-D

in Contempt for Failure to Abide by the Court Order Regarding Plaintiff's Timeshare, for Penalties and Sanctions against Defendant, for an Emergency Pickup Order, for Makeup Time, to Amend Pleadings, for Attorney's Fees and Costs, and for Other Related Relief
Denied;

08/04/2020

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

Mohamad's opposition to Plaintiff's Countermotion

Matter Heard;

08/04/2020



All Pending Motions (11:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Matter Heard;

Journal Entry Details:

DEFENDANT'S MOHAMAD ALHULAIBI'S EX PARTE PETITION/MOTION FOR AN ORDER REQUIRING PRODUCTION OF THE MINOR CHILD; FOR THE ISSUANCE OF A WARRANT FOR THE PICK-UP OF THE MINOR CHILD; FOR AN ORDER PREVENTING ABDUCTION OF THE MINOR CHILD PURSUANT TO NRS 125D; FOR A RETURN ORDER FOR THE MINOR CHILD TO HIS HOME COUNTRY OF SAUDI ARABIA...PLAINTIFF'S REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE WHY DEFENDANT SHOULD NOT BE HELD IN CONTEMPT FOR FAILURE TO ABIDE BY THE COURT ORDER REGARDING PLAINTIFF'S TIMESHARE, FOR PENALTIES AND SANCTIONS AGAINST DEFENDANT, FOR AN EMERGENCY PICK UP ORDER, FOR MAKEUP TIME, TO AMEND PLEADINGS, FOR ATTORNEY'S FEES AND COSTS, AND FOR OTHER RELATED RELIEF...MOHAMAD'S OPPOSITION TO PLAINTIFF'S COUNTERMOTION This matter is a companion case with T-20-203688-T heard simultaneously. Court interpreter (Arabic), Dalyia Ahmed, present on behalf of the Plaintiff. Both parties, Court interpreter, Attorney Green, Attorney Markman, and Attorney Willick appeared telephonically, pursuant to the Administrative Orders for public safety. Court noted this hearing stems from the disposing of the granting of the Motion To Dismiss. Further, Defendant filed timely the Notice Of Appeal. Court stated the case was dismissed, the matter is on appeal, and the Defendant's Motion and Plaintiff's Countermotion seek relief not collateral to the appeal. Further, filing these Motions in a case that was dismissed, is not appropriate and the relief requested is DENIED for lack of jurisdiction. If the result of the appeal results in the reverse of the dismissal of the case, then these issues can be heard. Until that happens, this Court is not the appropriate place to file these Motions. The appeal will proceed. Attorney Willick and Attorney Green shall prepare the Order and Attorney Markman will approve as to form and content. For further information, see Minute Order in case no. T-20-203688-T.;

03/24/2020

SERVICE

Summons

Alhulaibi, Mohamad Abulhakim

Served: 03/25/2020

ORDR

APRIL GREEN, ESQ.
Nevada Bar No.: 8340C
BARBARA BUCKLEY, ESQ.
Nevada Bar No: 3918
LEGAL AID CENTER OF SOUTHERN NEVADA, INC.
725 E. Charleston Blvd.
Las Vegas, Nevada 89104
(702)386-1415 phone
(702)386-1415 fax
asgreen@lacsnc.org
Attorneys for Plaintiff

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

AHED SAID SENJAB,)	
)	
Plaintiff,)	CASE NO.: D-20-606093-D
)	T-20-203688-T
)	DEPT. NO.: H
vs.)	
)	
MOHAMAD ALHULAIBI,)	DATE OF HEARING: August 4, 2020
)	TIME OF HEARING: 11:00 a.m.
Defendant.)	
)	

ORDER DENYING RELIEF

This matter coming before the Court on Mohamad Alhulaibi's Ex Parte Petition/Motion for an Order Requiring Production of the Minor Child; for the Issuance of a Warrant for the Pick-Up of the Minor Child; for an Order Preventing Abduction of the Minor Child Pursuant to NRS 125D; for a Return order for the Minor Child to his Home Country of Saudi Arabia, and upon Plaintiff's Opposition to Mohamad Alhulaibi's Ex Parte Petition/Motion for an Order Requiring Production of the Minor Child; for the Issuance of a Warrant for the Pick-Up of the Minor Child; for an Order Preventing Abduction of the Minor Child Pursuant to NRS 125D; for a Return order for the Minor Child to his Home Country of Saudi Arabia and Plaintiff's Countermotion/Petition for Abduction Prevention Measures, for Orders Prohibiting Removal of Child from Las Vegas, for Court Safeguard of Child's Passport, for Limited Visitation by a

1 Perpetrator of Domestic Violence, Stay of Order for Dismissal of Case; and for Attorney's Fees
2 and Costs; and subsequent Replies, Countermotions and Exhibits Plaintiff, AHED SAID
3 SENJAB, appearing telephonically with Court Interpreter (Arabic) Dalyia Ahmed, and
4 represented by LEGAL AID CENTER OF SOUTHERN NEVADA, INC., by APRIL GREEN,
5 ESQ., and Associate Counsel, MARSHAL WILLICK, ESQ., of the Willick Law Group, and
6 Defendant, MOHAMAD ALHULAIBI, appearing telephonically and represented by DAVID
7 MARKMAN, ESQ., the Court having heard the arguments from Counsel and having reviewed
8 the papers and pleadings, and good cause appearing, the Court finds as follows:

9 The **MATTER IS A COMPANION CASE** with T-20-203688-T, heard simultaneously.

10 The **COURT NOTED** this hearing stems from the disposition regarding the granting of
11 the Motion to Dismiss. Further, Plaintiff filed a timely Notice of Appeal.

12 The **COURT STATED** the case was dismissed and the matter is on appeal and the
13 Defendant's Motion and Plaintiff's Countermotion seek relief not collateral to the appeal.
14 Further, filing these Motions in a case that was dismissed is not appropriate and the relief
15 requested is DENIED for lack of jurisdiction.

16 The **COURT FURTHER STATED** that if the result of the appeal results in the reverse
17 of the dismissal of the case, then these issues can be heard. Until that happens, this Court is not
18 the appropriate place to file these Motions. The appeal will proceed.

19 The **COURT FURTHER STATED** that the request for a STAY is denied without
20 prejudice since there is an extended protection order in place and there is an expectation that it
21 could be renewed if the appeal is still going when the Extended Order of Protection expires.

22
23 **NOW, THEREFORE, IT IS ORDERED** that the subject motions, filed in a case that
24 was dismissed, is not appropriate and the relief requested is DENIED for lack of jurisdiction.

25 **IT IS FURTHER ORDERED** that the request for a STAY is denied without prejudice
26 since there is an extended order of protection in place.

1 **IT IS FURTHER ORDERED** that Attorney Willick and Attorney Green shall prepare
2 the Order and Attorney Markman will approve as to form and content. For further information,
3 see Minute Order in Case No. T-20-203688-T.

4 DATED this ____ day of _____, 2020.

Dated this 13th day of October, 2020



DISTRICT COURT JUDGE

kp
DCA D33 EFDA 1592
T. Arthur Ritchie
District Court Judge

7 Respectfully submitted,
8 **LEGAL AID CENTER OF**
9 **SOUTHERN NEVADA, INC.**



10 APRIL GREEN, ESQ.
11 Nevada Bar No.: 8340C
12 BARBARA BUCKLEY, ESQ.
13 Nevada Bar No.: 3918
14 725 E. Charleston Blvd.
15 Las Vegas, Nevada 89104
16 (702)386-1415 phone
17 (702)386-1415 fax
18 Attorneys for Plaintiff
19 asgreen@lacs.org
20
21
22
23
24
25
26
27
28

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Ahd Sinjab, Applicant

CASE NO: T-20-203688-T

7 vs

DEPT. NO. Department H

8 Mohamad Alhulaibi, Adverse
9 Party

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 10/13/2020

15 April Green, Esq.

asgreen@lacsns.org

16 Aileen Yeo

AYeo@lacsns.org

17 Ahd Sinjab

ahdsinjab@gmail.com

18 David Markman

David@markmanlawfirm.com

20

21

22

23

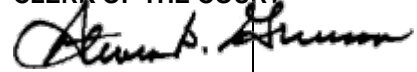
24

25

26

27

28



NEO
APRIL S. GREEN, ESQ.
Nevada Bar No. 8340C
BARBARA E. BUCKLEY, ESQ.
Nevada Bar No. 3918
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asgreen@lacs.org
Attorneys for Applicant

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

AHED SAID SENJAB,)
) Case No.: D-20-606093-D
Applicant,) T-20-203688-T
) Dept. No.: H
vs.)
)
MOHAMAD ALHULAIBI,)
)
Adverse Party.)

NOTICE OF ENTRY OF ORDER DENYING RELIEF

TO: MOHAMAD ALHULAIBI, Adverse Party; and

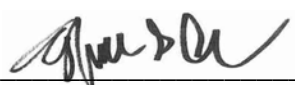
TO: DAVID MARKMAN, ESQ., Attorney for Adverse Party.

PLEASE TAKE NOTICE that an **ORDER DENYING RELIEF** was entered in the
above-entitled action on the 13th day of October, 2020 a copy of which is attached hereto.

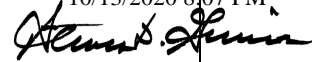
DATED this 14th day of October, 2020.

**LEGAL AID CENTER OF SOUTHERN NEVADA,
INC.**

By: _____



APRIL S. GREEN, ESQ.
Nevada Bar No. 8340C
BARBARA E. BUCKLEY, ESQ.
Nevada Bar No. 3918
725 East Charleston Boulevard
Las Vegas, Nevada 89104
(702) 386-1415 Direct/Fax
(702) 386-1070, Ext. 1415
asgreen@lacs.org
Attorneys for Applicant


CLERK OF THE COURT

ORDR

APRIL GREEN, ESQ.
Nevada Bar No.: 8340C
BARBARA BUCKLEY, ESQ.
Nevada Bar No: 3918
LEGAL AID CENTER OF SOUTHERN NEVADA, INC.
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Las Vegas, Nevada 89104
(702)386-1415 phone
(702)386-1415 fax
asgreen@lacs.org
Attorneys for Plaintiff

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

AHED SAID SENJAB,)	
)	
Plaintiff,)	CASE NO.: D-20-606093-D
)	T-20-203688-T
)	DEPT. NO.: H
vs.)	
)	
MOHAMAD ALHULAIBI,)	DATE OF HEARING: August 4, 2020
)	TIME OF HEARING: 11:00 a.m.
Defendant.)	
)	

ORDER DENYING RELIEF

This matter coming before the Court on Mohamad Alhulaibi's Ex Parte Petition/Motion for an Order Requiring Production of the Minor Child; for the Issuance of a Warrant for the Pick-Up of the Minor Child; for an Order Preventing Abduction of the Minor Child Pursuant to NRS 125D; for a Return order for the Minor Child to his Home Country of Saudi Arabia, and upon Plaintiff's Opposition to Mohamad Alhulaibi's Ex Parte Petition/Motion for an Order Requiring Production of the Minor Child; for the Issuance of a Warrant for the Pick-Up of the Minor Child; for an Order Preventing Abduction of the Minor Child Pursuant to NRS 125D; for a Return order for the Minor Child to his Home Country of Saudi Arabia and Plaintiff's Countermotion/Petition for Abduction Prevention Measures, for Orders Prohibiting Removal of Child from Las Vegas, for Court Safeguard of Child's Passport, for Limited Visitation by a

1 Perpetrator of Domestic Violence, Stay of Order for Dismissal of Case; and for Attorney's Fees
2 and Costs; and subsequent Replies, Countermotions and Exhibits Plaintiff, AHED SAID
3 SENJAB, appearing telephonically with Court Interpreter (Arabic) Dalyia Ahmed, and
4 represented by LEGAL AID CENTER OF SOUTHERN NEVADA, INC., by APRIL GREEN,
5 ESQ., and Associate Counsel, MARSHAL WILLICK, ESQ., of the Willick Law Group, and
6 Defendant, MOHAMAD ALHULAIBI, appearing telephonically and represented by DAVID
7 MARKMAN, ESQ., the Court having heard the arguments from Counsel and having reviewed
8 the papers and pleadings, and good cause appearing, the Court finds as follows:

9 The **MATTER IS A COMPANION CASE** with T-20-203688-T, heard simultaneously.

10 The **COURT NOTED** this hearing stems from the disposition regarding the granting of
11 the Motion to Dismiss. Further, Plaintiff filed a timely Notice of Appeal.

12 The **COURT STATED** the case was dismissed and the matter is on appeal and the
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14 Further, filing these Motions in a case that was dismissed is not appropriate and the relief
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20 prejudice since there is an extended protection order in place and there is an expectation that it
21 could be renewed if the appeal is still going when the Extended Order of Protection expires.

22
23 **NOW, THEREFORE, IT IS ORDERED** that the subject motions, filed in a case that
24 was dismissed, is not appropriate and the relief requested is DENIED for lack of jurisdiction.

25 **IT IS FURTHER ORDERED** that the request for a STAY is denied without prejudice
26 since there is an extended order of protection in place.
27
28

1 **IT IS FURTHER ORDERED** that Attorney Willick and Attorney Green shall prepare
2 the Order and Attorney Markman will approve as to form and content. For further information,
3 see Minute Order in Case No. T-20-203688-T.

4 DATED this ____ day of _____, 2020.

Dated this 13th day of October, 2020



DISTRICT COURT JUDGE

kp
DCA D33 EFDA 1592
T. Arthur Ritchie
District Court Judge

5
6
7
8 Respectfully submitted,
9 **LEGAL AID CENTER OF**
10 **SOUTHERN NEVADA, INC.**



11 APRIL GREEN, ESQ.
12 Nevada Bar No.: 8340C
13 BARBARA BUCKLEY, ESQ.
14 Nevada Bar No.: 3918
15 725 E. Charleston Blvd.
16 Las Vegas, Nevada 89104
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1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Ahd Sinjab, Applicant

CASE NO: T-20-203688-T

7 vs

DEPT. NO. Department H

8 Mohamad Alhulaibi, Adverse
9 Party

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 10/13/2020

15 April Green, Esq.

asgreen@lacsns.org

16 Aileen Yeo

AYeo@lacsns.org

17 Ahd Sinjab

ahdsinjab@gmail.com

18 David Markman

David@markmanlawfirm.com

20

21

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

May 20, 2020

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

May 20, 2020 10:00 AM All Pending Motions

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Kathy Prock

PARTIES:

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

JOURNAL ENTRIES

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

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

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

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

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

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

PRINT DATE:	11/16/2020	Page 1 of 8	Minutes Date:	May 20, 2020
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

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

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

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

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

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

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

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

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

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

COURT ORDERED, the following:

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

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

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

INTERIM CONDITIONS:

PRINT DATE:	11/16/2020	Page 2 of 8	Minutes Date:	May 20, 2020
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

FUTURE HEARINGS:

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

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

PRINT DATE:	11/16/2020	Page 3 of 8	Minutes Date:	May 20, 2020
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES**

June 16, 2020

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

June 16, 2020 9:00 AM All Pending Motions

HEARD BY: Ritchie, T. Arthur, Jr.**COURTROOM:** RJC Courtroom 03G**COURT CLERK:** Kathy Prock**PARTIES:**

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

JOURNAL ENTRIES

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

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

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

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

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

PRINT DATE:	11/16/2020	Page 4 of 8	Minutes Date:	May 20, 2020
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Court noted there is a Protection Order for domestic violence (case no. T-20-203688-T), Plaintiff being the Applicant, the Protection Order was heard and extended, and is in effect until 2/14/2021. Attorney Markman stated Defendant denies all of Plaintiff's allegations in her application.

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

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

Court noted Federal law preempts Nevada law.

COURT ORDERED, the following:

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

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	11/16/2020	Page 5 of 8	Minutes Date:	May 20, 2020
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

June 22, 2020

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

June 22, 2020 11:00 AM Minute Order

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Kathy Prock

PARTIES:

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

JOURNAL ENTRIES

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

Mohamad Abulhakim Alhulaibi's Motion To Dismiss is GRANTED.

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

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	11/16/2020	Page 6 of 8	Minutes Date:	May 20, 2020
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint

COURT MINUTES

August 04, 2020

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

August 04, 2020 11:00 AM All Pending Motions

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Kathy Prock

PARTIES:

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

JOURNAL ENTRIES

- DEFENDANT'S MOHAMAD ALHULAIBI'S EX PARTE PETITION/MOTION FOR AN ORDER REQUIRING PRODUCTION OF THE MINOR CHILD; FOR THE ISSUANCE OF A WARRANT FOR THE PICK-UP OF THE MINOR CHILD; FOR AN ORDER PREVENTING ABDUCTION OF THE MINOR CHILD PURSUANT TO NRS 125D; FOR A RETURN ORDER FOR THE MINOR CHILD TO HIS HOME COUNTRY OF SAUDI ARABIA...PLAINTIFF'S REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE WHY DEFENDANT SHOULD NOT BE HELD IN CONTEMPT FOR FAILURE TO ABIDE BY THE COURT ORDER REGARDING PLAINTIFF'S TIMESHARE, FOR PENALTIES AND SANCTIONS AGAINST DEFENDANT, FOR AN EMERGENCY PICK UP ORDER, FOR MAKEUP TIME, TO AMEND PLEADINGS, FOR ATTORNEY'S FEES AND COSTS, AND FOR OTHER RELATED RELIEF...MOHAMAD'S OPPOSITION TO PLAINTIFF'S COUNTERMOTION

This matter is a companion case with T-20-203688-T heard simultaneously.

Court interpreter (Arabic), Dalyia Ahmed, present on behalf of the Plaintiff.

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

PRINT DATE:	11/16/2020	Page 7 of 8	Minutes Date:	May 20, 2020
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Court noted this hearing stems from the disposing of the granting of the Motion To Dismiss. Further, Defendant filed timely the Notice Of Appeal.

Court stated the case was dismissed, the matter is on appeal, and the Defendant's Motion and Plaintiff's Countermotion seek relief not collateral to the appeal. Further, filing these Motions in a case that was dismissed, is not appropriate and the relief requested is DENIED for lack of jurisdiction.

If the result of the appeal results in the reverse of the dismissal of the case, then these issues can be heard. Until that happens, this Court is not the appropriate place to file these Motions. The appeal will proceed.

Attorney Willick and Attorney Green shall prepare the Order and Attorney Markman will approve as to form and content.

For further information, see Minute Order in case no. T-20-203688-T.

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	11/16/2020	Page 8 of 8	Minutes Date:	May 20, 2020
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.



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

DAVID MARKMAN, ESQ.
4484 S. PECOS RD., STE 130
LAS VEGAS, NV 89121

DATE: November 16, 2020
CASE: D-20-606093-D

RE CASE: AHED SAID SENJAB vs. MOHAMAD ABULHAKIN ALHULAIBI

NOTICE OF APPEAL FILED: November 12, 2020

YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.

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

- ☒ \$250 – Supreme Court Filing Fee (Make Check Payable to the Supreme Court)**
 - If the \$250 Supreme Court Filing Fee was not submitted along with the original Notice of Appeal, it must be mailed directly to the Supreme Court. The Supreme Court Filing Fee will not be forwarded by this office if submitted after the Notice of Appeal has been filed.
- ☒ \$24 – District Court Filing Fee (Make Check Payable to the District Court)**
- ☒ \$500 – Cost Bond on Appeal (Make Check Payable to the District Court)**
 - NRAP 7: Bond For Costs On Appeal in Civil Cases
 - *Previously paid Bonds are not transferable between appeals without an order of the court.*
- ☐ Case Appeal Statement
 - NRAP 3 (a)(1), Form 2
- ☐ Order
- ☐ Notice of Entry of Order

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

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

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

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

Certification of Copy

State of Nevada }
County of Clark } SS:

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

NOTICE OF APPEAL; CASE APPEAL STATEMENT; DISTRICT COURT
DOCKET ENTRIES; ORDER DENYING RELIEF; NOTICE OF ENTRY OF ORDER DENYING
RELIEF; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

AHED SAID SENJAB,

Plaintiff(s),

vs.

MOHAMAD ABULHAKIN ALHULAIBI,

Defendant(s),

Case No: D-20-606093-D

Dept No: H

now on file and of record in this office.

IN WITNESS THEREOF, I have hereunto
Set my hand and Affixed the seal of the
Court at my office, Las Vegas, Nevada
This 16 day of November 2020.

Steven D. Grierson, Clerk of the Court



Amanda Hampton, Deputy Clerk