

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * *

ALEX B. GHIBAUDO,
Appellant,
v.
TARA KELLOGG,
Respondents.

Electronically Filed
Supreme Court No.: May 24 2021 06:19 p.m.
Elizabeth A. Brown
Eighth Judicial District Court Clerk of Supreme Court
Case No.: A-17-763560-C

**RESPONDENT/CROSS-APPELLANT TARA KELLOGG’S RESPONSE
IN OPPOSITION TO APPELLANT’S MOTION TO EXTEND TIME
TO FILE TRANSCRIPT REQUEST FORM**

COMES NOW Respondent TARA KELLOGG fka TARA KELLOGG-GHIBAUDO (hereinafter “Respondent” or “KELLOGG”), by and through her counsel the law firm of Cory Reade Dows and Shafer, and submits her Response in Opposition to Appellant’s Motion to Extend Time to File Transcript Request Form. Appellant ALEX GHIBAUDO filed his Notice of Appeal on December 17th, 2020. Pursuant to N.R.A.P. 9(a)(3), Appellant GHIBAUDO had 14 days to file his Transcript Request Form from the date that the Appeal was docketed. Appellant GHIBAUDO did not file the Transcript Request Form or seek to meet and confer regarding transcripts. Thirteen days after the Appeal was docketed, the Court suspended the deadlines for participation in the NRAP 16 Settlement Program.

On March 18th, 2021, this Court reinstated the Appellant's Deadlines and gave Appellant an additional fourteen days to file his Transcript Request Form. Appellant GHIBAUDO did not file the Transcript Request Form or seek to meet and confer regarding transcripts. Twelve days after the Appeal was docketed, on March 30th, 2021, the Court issued an Order to Show Cause and suspended briefing. On May 14th, 2021, this Court reinstated briefing and gave Appellant seven days to file his Transcript Request Form. Appellant GHIBAUDO did not file the Transcript Request Form or seek to meet and confer regarding transcripts.

Appellant GHIBAUDO has asked this Court for an extension of time to file his Transcript Request Form but never specifies precisely to this Court what delays have been caused between this Court's May 14th, 2021 Order and May 21, 2021 deadline. Appellant GHIBAUDO asks this Court for a three week extension of a 7-day deadline after Appellant GHIBAUDO has had five months to prepare a Transcript Request Form. GHIBAUDO waited until 10:30 p.m. on the date that the Transcript Request Form was due to file the instant Motion. The Motion for Extension of Time is actually longer in length than the Transcript Request Form that GHIBAUDO was required to file.

Furthermore Appellant GHIBAUDO's excuse that pending motions for enforcement of various Order before the District Court has caused GHIBAUDO to not be able to comply with this Court's Order is disingenuous because

GHIBAUDO has filed nothing with the District Court in the last two weeks. There is a pending Motion for Contempt due to GHIBAUDO's failure to pay spousal support for the last twenty-eight months; GHIBAUDO filed his Oppositions to that Motion on April 30th, 2021.¹ There is a pending Motion for Entry of Judgment against Alex B. Ghibaudo P.C. due to its failure to respond to a Writ of Garnishment and Writ of Execution; GHIBAUDO filed his Oppositions to that Motion on April 22nd, 2021.² There is a pending Motion for Clarification of a Consent Order signed by GHIBAUDO in a related child support enforcement action for which GHIBAUDO has never paid the child support under threat of enforcement to this Court;³ GHIBAUDO filed his Opposition to that Motion on April 22nd, 2021.⁴ As this Court can see, none of those motions provide any good cause for Appellant GHIBAUDO never filing his Transcript Request Form(s).

1 First Page of Ghibaudo Opposition to Motion for Order Show Cause Why Not Held in Contempt, attached as Exhibit "A".

2 First Page of Ghibaudo Opposition to Motion for Entry of Judgment, attached as Exhibit "B".

3 Order Regarding Objection, attached as Exhibit "C"; January 2021 Consent Order, attached as Exhibit "D"

4 First Page of Ghibaudo Opposition to Motion for Entry of Judgment, attached as Exhibit "B".

Pursuant to NRAP 26, Respondent TARA KELLOGG respectfully requests that this Court deny the instant Motion to Extension of Time.

DATED this 24th day of May, 2021.

CORY READE DOWS & SHAFER

By: R. Christopher Reade
R. CHRISTOPHER READE, ESQ.
Nevada Bar No. 006791
1333 North Buffalo Drive, Suite 210
Las Vegas, Nevada 89128
Telephone: (702) 794-4411
Attorney for Respondent TARA
KELLOGG

CERTIFICATE OF SERVICE

Pursuant to NRAP 25(c)(1) and NEFCR 9, I certify that on the 24th day of May, 2021 that I caused to be served the foregoing RESPONDENT/CROSS-APPELLANT TARA KELLOGG’S RESPONSE IN OPPOSITION TO APPELLANT’S MOTION TO EXTEND TIME TO FILE TRANSCRIPT REQUEST FORM to the following:

■ **NEFCR System in accordance with NEFCR 9 and 13**

Alex B. Ghibaudo, Esq. Alex B. Ghibaudo, PC. 197 E. California Ave, Suite 250 Las Vegas, Nevada 89104 Counsel for Appellant	
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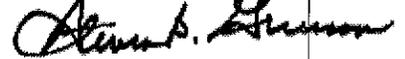
□ **By fax or other electronic transmission in accordance with NRCP 5(D) upon the following Parties, for which proof of successful transmission is attached hereto.**

/s/ Elizabeth Arthur

An Employee of Cory Reade Dows & Shafer

EXHIBIT "A"

EXHIBIT "A"



1 **OPPC**
2 Michancy M. Cramer, Esq.
3 Nevada Bar No. 11545
4 **ALEX GHIBAUDO, PC**
5 197 E California Ave, Ste 250
6 Las Vegas, Nevada 89104
7 T: (702) 978-7090
8 F: (702) 924-6553
9 E: alex@glawvegas.com
10 *Attorney for Alex Ghibardo*

11 **EIGHTH JUDICIAL DISTRICT COURT**
12 **FAMILY DIVISION**
13 **CLARK COUNTY, NEVADA**

14 TARA KELLOGG,
15
16 Plaintiff,

Case Number: D-15-522043-D

Department: H

17 vs.

ORAL ARGUMENT REQUESTED

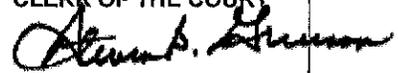
18 ALEX GHIBAUDO,
19
20 Defendant.

21 **OPPOSITION TO PLAINTIFF'S RENEWED MOTION TO ENFORCE**
22 **AND FOR AN ORDER TO SHOW CAUSES WHY DEFENDANT ALEX**
23 **GHIBAUDO SHOULD NOT BE HELD IN CONTEMPT FOR HIS**
24 **FAILURE TO COMPLY WITH THE TERMS OF DECREE OF DIVORCE**
25 **AND NOVEMBER 10, 2021 JUDGMENT; COUNTERMOTION TO**
26 **TERMINATE ALIMONY, TO SANCTION PLAINTIFF FOR**
27 **MULTIPLYING PROCEEDINGS, AND FOR ATTORNEY FEES AND**
28 **COSTS**

COMES NOW, Defendant, ALEX GHIBAUDO, by and through his attorney, MICHANCY M. CRAMER, ESQ., of ALEX GHIBAUDO, P.C., and hereby files this *Opposition to Plaintiff's Renewed Motion to Enforce And For An*

EXHIBIT "B"

EXHIBIT "B"



1 **OPPC**
2 Michancy M. Cramer, Esq.
3 Nevada Bar No. 11545
4 **ALEX GHIBAUDO, PC**
5 197 E California Ave, Ste 250
6 Las Vegas, Nevada 89104
7 T: (702) 978-7090
8 F: (702) 924-6553
9 E: alex@glawvegas.com
10 *Attorney for Alex Ghibaudo*

11 **EIGHTH JUDICIAL DISTRICT COURT**
12 **FAMILY DIVISION**
13 **CLARK COUNTY, NEVADA**

14 TARA KELLOGG,
15
16 Plaintiff,
17
18 vs.
19
20 ALEX GHIBAUDO,
21
22 Defendant.

Case Number: D-15-522043-D
Department: H

ORAL ARGUMENT REQUESTED

23 **CONSOLIDATED OPPOSITION TO PLAINTIFF'S MULTIPLE**
24 **APPLICATIONS AND MOTIONS FOR ENTRY OF ORDER AND**
25 **JUDGMENT AGAINST GARNISHEE DEFENDANT ALEX B.**
26 **GHIBAUDO, P.C.; COUNTERMOTION TO SANCTION PLAINTIFF AND**
27 **HER COUNSEL AND FOR ATTORNEY FEES AND COSTS**

28 COMES NOW, Defendant, ALEX GHIBAUDO, by and through his
attorney, MICHANCY M. CRAMER, ESQ., of ALEX GHIBAUDO, P.C., and
hereby files this *Consolidated Opposition to Plaintiff's Applications and Motions
for Entry of Order and Judgment Against Garnishee Defendant Alex B. Ghibaudo,
P.C.; Countermotion to Sanction Plaintiff and her Counsel and for Attorney Fees*

EXHIBIT "C"

EXHIBIT "C"

1 OFO
2 STEVEN B. WOLFSON
3 DISTRICT ATTORNEY
4 Nevada Bar No. 001565
5 FAMILY SUPPORT DIVISION
6 1900 East Flamingo Road, Suite 100
7 Las Vegas, Nevada 89119-5168
8 (702) 671-9200 – TTY and/or other relay services: 711
9 dafslegalgroup@clarkcountyda.com
10 UPI-769870200A

11 **DISTRICT COURT**
12 **CLARK COUNTY, NEVADA**

13 NV DHHS Div. of Welfare & Supp. Services
14 (Tara Rae Kellogg),
15 }
16 } Petitioner,
17 }
18 } vs.
19 } Alex B Ghibaudo,
20 } Respondent.

Case no.: R-11-161999-R
Dept no. H/ CHILD SUPPORT

21 **ORDER FOLLOWING OBJECTION**

22 This matter having come on for hearing this 14th day of October, 2020, on the
23 Objection of the: Respondent Petitioner District Attorney's Office, Family
24 Support Division, (hereinafter, "DAFS"), to the Master's Recommendations from the
25 Child Support Court hearings held on the 17th day of July 2020 and the 12th day of
26 August, 2020;

27 Respondent, Alex Ghibaudo, being present telephonically and represented by his
28 attorney of record, Michancy Cramer; Petitioner, Tara Kellogg, being present
telephonically and represented by her attorney of record, R. Christopher Reade; and
Steven B. Wolfson, District Attorney, being present telephonically by and through
Deputy District Attorney, ADAM HUGHES, Esq.,

The Court having reviewed the pleadings and papers herein and having heard
argument AND GOOD CAUSE THEREFORE APPEARING, this Court hereby enters
the following findings, conclusions and orders:

1 **THE COURT FINDS** at the hearing on July 17, 2020, the Hearing Master
2 recommended the Respondent be found in contempt and sentenced to 5 days of stayed
3 jail time for his willful failure to pay child support arrears as ordered. From February
4 2020 to June 2020, \$4,095 in child support arrears payments had come due, Respondent
5 paid approximately \$750 during that time period, and Respondent was deficient \$3,345.

6 **THE COURT FURTHER FINDS** on August 4, 2020 Respondent filed an
7 Objection To Hearing Master's Recommendations from the July 17, 2020 hearing.

8 **THE COURT FURTHER FINDS** Respondent's Objection argues the Hearing
9 Master's recommendation is clearly erroneous because the Hearing Master should have
10 deferred to the District Court where the parties had an evidentiary hearing pending in
11 case D-15-522043-D regarding child support arrearages and spousal support arrearages.

12 **THE COURT FURTHER FINDS** on August 14, 2020 Petitioner filed a
13 Response To Defendant's Objection To Master's Recommendation And Motion For
14 Court To Adopt The Master's Recommendation Over Defendant's Objection Pursuant
15 To NRCF 53, EDCR 1.40(e) And 1.40(f).

16 **THE COURT FURTHER FINDS** on June 29, 2020, the District Attorney filed
17 the District Attorney's Notice Of Motion & Motion To Suspend Alex Ghibaudo's
18 License To Practice Law In The State Of Nevada.

19 **THE COURT FURTHER FINDS** the Motion came on for a hearing on August
20 12, 2020.

21 **THE COURT FURTHER FINDS** the Respondent did not file an opposition to
22 the motion.

23 **THE COURT FURTHER FINDS** at the Motion hearing on August 12, 2020, the
24 parties agreed that Respondent owes \$8,388.70 in child support arrearages. The Hearing
25 Master further found per NRS 425.540(1) and NRS 425.560 the Respondent owes child
26 support arrears for the emancipated child, Nicole, and that those arrears are in excess of
27 \$1,000. The Hearing Master further found Respondent is delinquent for not less than two
28 months in payments for the support of Nicole as ordered by the Court.

1 **THE COURT FURTHER FINDS** the Hearing Master recommended that,
2 pursuant to NRS 425.560(1)(b)(2) a court order be issued pursuant to subsection 1 to
3 include the language that if Respondent does not within 30 days after the date on which
4 this recommendation becomes and order is issued, submit to the State Bar of Nevada a
5 letter from the district attorney that the Respondent has complied with or satisfied the
6 arrearage pursuant to NRS 425.560, any professional or occupational license, certificate
7 or permit issued pursuant to title 54 of NRS to the Respondent will be automatically
8 suspended.

9 **THE COURT FURTHER FINDS** on August 19, 2020 Respondent filed an
10 Objection To Hearing Master's Recommendations from the August 12, 2020 hearing.

11 **THE COURT FURTHER FINDS** Respondent's Objection argues the Hearing
12 Master lacked the jurisdiction and authority to suspend a law license.

13 **THE COURT FURTHER FINDS** on August 24, 2020 Petitioner filed a
14 Response To Defendant's Objection To Master's Recommendation And Application To
15 Court To Take Action On The Master's Recommendation Dated August 12, 2020 Over
16 Defendant's Objection Pursuant to NRCPC 53, EDCR 1.40(e) And 1.40(f).

17 **THE COURT FURTHER FINDS** on October 7, 2020 the District Attorney filed
18 the District Attorney's Response To Respondent's Objection.

19 **THE COURT FURTHER FINDS** on October 13, 2020 the Respondent filed a
20 Reply.

21 **THE COURT FURTHER FINDS** at the Objection Hearing on October 14,
22 2020, the Court reviewed the pleadings, the Master's Recommendations, and heard
23 arguments from Respondent, Petitioner, and the District Attorney.

24 **THE COURT FURTHER FINDS** this issue of a law license being suspended for
25 an a lawyer's failure to pay their court ordered child support is an issue of first
26 impression for the court and there is no case law on point interpreting the statutes.

27 **THE COURT FURTHER FINDS** the Hearing Master's recommendations are
28 reviewed for clear error.

1 **THE COURT CONCLUDES** the Respondent's assertion that he is litigating the
2 child support arrears in the parties' family court case is not a defense to the Hearing
3 Master's finding of contempt at the July 17, 2020 hearing.

4 **THE COURT CONCLUDES** the Hearing Master's Recommendation from the
5 hearing on July 17, 2020 is not clearly erroneous.

6 **THE COURT CONCLUDES** a law license can be suspended pursuant to NRS
7 7.037 and NRS 425.540 for failure to pay child support.

8 **THE COURT CONCLUDES** lawyers do not maintain a special status which
9 would allow a lawyer to avoid a law license suspension for their failure to pay child
10 support.

11 **THE COURT CONCLUDES** the Respondent's Objections lack merit.

12 **THE COURT CONCLUDES** the Hearing Master's Recommendation from the
13 hearing on August 12, 2020 is not clearly erroneous.

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1 ACCORDINGLY, IT IS HEREBY ORDERED, ADJUDGED AND
2 DECREED the Master's Recommendation from the July 17, 2020 hearing, attached
3 hereto as Exhibit 1, is affirmed and adopted as an order of this Court.

4 IT IS FURTHER ORDERED, ADJUDGED AND DECREED the Master's
5 Recommendation from the August 12, 2020 hearing, attached hereto as Exhibit 2, is
6 affirmed and adopted as an order of this Court.

7 IT IS FURTHER ORDERED, ADJUDGED AND DECREED this Order shall
8 be STAYED to allow Respondent to file an appeal or until further order of the court in
9 case R-11-161999-R to lift the stay.

10
11 DATED this _____ day of _____ ~~Dated this 17th~~ ²⁰ day of December, 2020

12
13 

14 T. ARTHUR RITCHIE, JR., DISTRICT COURT JUDGE
15 72A 92A 33A3 5C06
16 T. Arthur Ritchie
17 District Court Judge

18 Submitted By:

18 Approved as to form and content:

19 ADAM HUGHES, ESQ.
20 DEPUTY DISTRICT ATTORNEY
21 Nevada Bar No.: 00012596
22 FAMILY SUPPORT DIVISION
23 1900 East Flamingo Rd., Ste 100
24 Las Vegas, Nevada 89119
25 (702) 671-9200

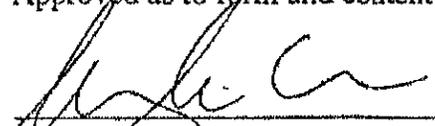
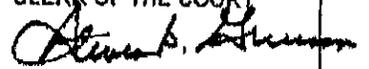
19 
20 MICHANCY CRAMER, ESQ.
21 197 E CALIFORNIA AVE. STE 250
22 LAS VEGAS NV 89101
23 (702) 462-5888
24 Attorney for Respondent

EXHIBIT 1

1 MRAO
 STEVEN B. WOLFSON
 2 DISTRICT ATTORNEY
 Nevada Bar No. 001565
 FAMILY SUPPORT DIVISION
 3 1900 East Flamingo Road, Suite 100
 Las Vegas, Nevada 89119-5168
 (702) 671-9200
 4 TTY and/or other relay services: 711
 769870200A

Electronically Filed
 8/10/2020 7:17 AM
 Steven D. Grierson
 CLERK OF THE COURT



District Court
CLARK COUNTY, NEVADA

5 NV DHHS DIV OF WELFARE & SUPP SERVICES,)
 6 (TARA RAE KELLOGG),)
 7)
 vs.)
 8)
 ALEX B GHIBAUDO,)
 9)
 Respondent.)

Case No. R-11-161999-R
 Department No. CHILD SUPPORT

MASTER'S RECOMMENDATION

11 This matter having been heard on JULY 17, 2020 before the undersigned Hearing Master, having considered all the evidence
 12 and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

13 Parties present: Respondent Respondent's attorney Petitioner Petitioner's attorney

14 PATERNITY PATERNITY PREVIOUSLY DECIDED

15 FINANCIALS: CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

16 Basis for adjustment from state formula: _____
 Respondent is to pay current support for the child(ren), **Arrears Only**.

CHILD SUPPORT

17 Respondent is to pay monthly:

18 _____ child support
 _____ medical support
 _____ spousal support
 19 \$819.00 arrears payment

20 ARREARAGES ARREARAGES NOT ADDRESSED AT THIS HEARING

21 Arrears/Obligation period is _____ through 01/31/20.
 Arrears, interest & penalties calculated through 01/31/2020 by audit. For accounting purposes next payment
 falls due 02/01/2020.

22	child support arrearage of	<u>\$1,685.00</u>	plus interest of	<u>\$986.99</u>	penalty of	<u>\$1,490.07</u>
	medical support arrearage of	<u>\$2,622.37</u>	plus interest of	<u>\$690.38</u>	penalty of	<u>\$336.19</u>
23	spousal support arrearage of	_____	plus interest of	_____		
	medical expense arrearage of	<u>\$715.50</u>				
24	genetic test costs of	_____				
	total arrearages of	<u>\$5,022.87</u>	total interest	<u>\$1,677.37</u>	total penalty	<u>\$1,826.26</u>

25 **GRAND TOTAL (arrearages + interest + penalty) = \$8,526.50**

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- The total arrears are hereby confirmed.
- The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040.
- Arrears of \$_____ subject to modification until _____, and arrears of \$_____ reduced to judgment.
- Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.
-

\$ 819.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

- Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.
 - Good cause to stay income withholding is based on:_____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.
 - ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: only order _____.
 - ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.
 - Health insurance coverage for the minor child(ren) herein:
 - Respondent to provide: Petitioner to provide: Both Parties to provide:
 - if available through employer. shall provide per court order.
 - Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.
- Under the Affordable Care Act, Medicaid is acceptable coverage.

- CONTEMPT OF COURT NOT A SHOW CAUSE HEARING
 - RESPONDENT ORDERED TO SHOW CAUSE CONCERNING CONTEMPT.
 - ORDER TO SHOW CAUSE CONTINUED TO NEXT COURT DATE.
 - Respondent is hereby found in Contempt of Court and sentenced to 5 days in the Clark County Detention Center; this sentence shall be stayed until the next court date.
 - The following sentence(s) shall be stayed/continued to the next court date unless imposed or vacated today:

Sentence of <u>25</u> days in the Clark County Detention Center issued <u>12-24-19</u> is	_____ imposed _____ vacated _____ stayed
Sentence of _____ days in the Clark County Detention Center issued _____ is	_____ imposed _____ vacated _____ stayed
Sentence of _____ days in the Clark County Detention Center issued _____ is	_____ imposed _____ vacated _____ stayed
Sentence of _____ days in the Clark County Detention Center issued _____ is	_____ imposed _____ vacated _____ stayed
 - Respondent to be released from custody on _____.
 - Respondent may be released from the above sentence immediately upon payment of \$_____ to be released to Petitioner as child support.
 - NO BAIL BENCH WARRANT HEREBY ISSUED FOR THE ARREST OF RESPONDENT. RESPONDENT MAY BE RELEASED UPON PAYMENT OF \$_____ TO BE RELEASED TO PETITIONER AS CHILD SUPPORT. Where circumstances justify a sufficient basis, the District Attorney may administratively quash or recall the bench warrant.
 - BENCH WARRANT PREVIOUSLY ISSUED IS HEREBY QUASHED. CONTINUED.
 - MODIFICATION OF PRIOR ORDER:

Steven B. Wolfson, District Attorney, Nevada Bar No. 001565
 Family Support Division
 1910 East Flamingo Road #100
 Las Vegas, Nevada 89119-5168

1 SUSPENSION OF LICENSES:

2 **PAYMENTS**

3 All mailed payments **MUST** be made in the form of a cashier's check, money order or business check **ONLY**, made
4 payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are
also accepted. Fees may apply.

5 **Payments can be mailed to:**

6 State Collection and Disbursement Unit (SCaDU)
7 P.O. Box 98950
8 Las Vegas, Nevada 89193-8950

9 **Payments can be made in person at:**

10 State Collection and Disbursement Unit (SCaDU)
11 1900 East Flamingo Road
12 Las Vegas, Nevada 89119-5168

13 Additionally, the following information must be included with each payment: name (first, middle, last) of person
14 responsible for paying child support, social security number of person responsible for paying child support, child
15 support case number, and name of petitioner (first and last name of person receiving child support).

16 **NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.**

17 **NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.**

18 **NOTICE:** Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant
19 to NRS 99.040. If the Respondent pays support through income withholding and the full obligation is not met by the amount
20 withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the
21 amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be
22 subject to assessment of interest. The Respondent may avoid these additional costs by making current support payments each
23 month. If another state takes jurisdiction and obtains a new order, Nevada interest will only be calculated to the date of the
24 new order and will be enforced.

25 **NOTICE:** Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and
26 Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the
27 support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this
28 purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

NOTICE: Objections/Appeals are governed by EDCR 1.40(e) and (f). You have ten (10) days from receipt of this Master's
Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final
Order/Judgment being ordered by District Court.

NOTICE: Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written
Notice of Entry of Judgment.

NOTICE: Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address,
change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10)
days of such change.

NOTICE: If you want to adjust the amount of child support established in this order, you **MUST** file a motion to modify the
order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the
child support obligation established in this order will continue until such time as all children who are the subject of this order
reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18
years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties

1 agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the date the motion was filed.

2 Respondent to bring new financial statement and proof of income next date.

3 This order does not stay collection of support arrears by execution or any other means allowed by law.

4 *****

5 MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

6 Last payment of \$750 received 04/17/20.

7 Amount due in this case since last hearing \$4,095 (\$819 x 5 months February - June 2020).

8 Respondent has paid \$750 (approximately 22%) to this case since last hearing leaving a deficiency in this case of \$3,345.

9 R testified lack of payments b/c COVID-19 impacting his income. R testified he received PPP loan through federal
10 gov't. R testified ongoing business expenses. R testified b/c child is adult and R's priority is business. R testified and
11 clarified that P has the income.

12 D522043 ongoing litigation regarding spousal support and business valuation arrears. DAFS re-audited arrears without
13 including spousal support and spousal support interest. Parties have Evidentiary Hearing set on 9/17/2020 at 9 a.m. P's
14 counsel indicates that matter has multiple expert witnesses and not likely to address the issue at that time.

15 R's oral to continue Motion to Suspend License pending outcome of evidentiary hearing in D522043 is denied.

16 NEXT HEARING DATE IS Aug 12, 2020 at 2:45 PM in Courtroom 2 in Child Support Court
17 at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for
18 further proceedings.

19 DATED: JULY 17, 2020



MASTER

20 USJR DISPOSITIONS

- 21 - Settled/Withdrawn w/Judicial Conference/Hearing
- 22 - Involuntary (Statutory) Dismissal
- 23 - Dismissed / Want of Prosecution
- 24 - Transferred to Another Jurisdiction
- 25 - Other Manner of Dispo
- 26 - Close Case

Respondent/Respondent's Attorney
Receipt of this document is
acknowledged by my signature.

27 ORDER/JUDGMENT

28 The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844. The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an ORDER/JUDGMENT of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. The parties are ordered to comply with this Order/Judgment.

The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

IT IS HEREBY ORDERED that the Master's Recommendation IS affirmed and adopted as an ORDER/JUDGMENT of the District Court this _____ day of _____, 20_____.

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IT IS HEREBY ORDERED that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20____ and this matter is remanded to Child Support Court on _____, 20____ at _____, M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

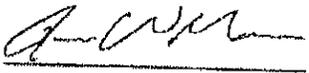
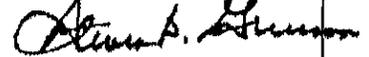
By: 
DEPUTY DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168

EXHIBIT 2

1 MRAO
STEVEN B. WOLFSON
2 DISTRICT ATTORNEY
Nevada Bar No. 001565
FAMILY SUPPORT DIVISION
3 1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200
4 TTY and/or other relay services: 711
769870200A

Electronically Filed
9/2/2020 9:32 AM
Steven D. Grierson
CLERK OF THE COURT



District Court
CLARK COUNTY, NEVADA

5
6 NV DHHS DIV OF WELFARE & SUPP SERVICES,)
(TARA RAE KELLOGG),)
7)
vs.)
8 ALEX B GHIBAUDO,)
9)
Respondent.)

Case No. R-11-161999-R

Department No. CHILD SUPPORT

MASTER'S RECOMMENDATION

11 This matter having been heard on AUGUST 12, 2020 before the undersigned Hearing Master, having considered all the
12 evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

13 Parties present: Respondent Respondent's attorney Petitioner Petitioner's attorney

14 PATERNITY PATERNITY PREVIOUSLY DECIDED

15 FINANCIALS: CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

16 Basis for adjustment from state formula: _____

Respondent is to pay current support for the child(ren), Arrears Only.

CHILD SUPPORT

17 Respondent is to pay monthly:

18 _____ child support
_____ medical support
_____ spousal support
19 \$819.00 arrears payment

20 ARREARAGES ARREARAGES NOT ADDRESSED AT THIS HEARING

Arrears Obligation period is _____ through 06/30/2020.

21 Prior Judgment was through 09/30/17. Arrears, interest, and Penalty calculated through 06/30/2020 by audit.

For accounting purposes the next payment falls due 07/01/2020

22	child support arrearage of	<u>\$768.00</u>	plus interest of	<u>\$1,020.70</u>	penalty of	<u>\$1,490.07</u>
	medical support arrearage of	<u>\$2,622.37</u>	plus interest of	<u>\$764.13</u>	penalty of	<u>\$336.19</u>
23	spousal support arrearage of	_____	plus interest of	<u>\$671.74</u>		
	medical expense arrearage of	<u>\$715.50</u>				
24	genetic test costs of	_____				
	total arrearages of	<u>\$4,105.87</u>	total interest	<u>\$2,456.57</u>	total penalty	<u>\$1,826.26</u>

25 GRAND TOTAL (arrears + interest + penalty) = \$8,388.70

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- The total arrears are hereby confirmed.
- The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040.
- Arrears of \$_____ subject to modification until _____, and arrears of \$_____ reduced to judgment.
- Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.
-

\$ 819.00 TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

- Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.
- Good cause to stay income withholding is based on:_____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.
 - ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: only order _____.
 - ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.
 - Health insurance coverage for the minor child(ren) herein:
 - Respondent to provide: Petitioner to provide: Both Parties to provide:
 - if available through employer. shall provide per court order.
 - Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.
- Under the Affordable Care Act, Medicaid is acceptable coverage.

- CONTEMPT OF COURT NOT A SHOW CAUSE HEARING
- RESPONDENT ORDERED TO SHOW CAUSE CONCERNING CONTEMPT.
- ORDER TO SHOW CAUSE CONTINUED TO NEXT COURT DATE.
- Respondent is hereby found in Contempt of Court and sentenced to _____ days in the Clark County Detention Center; this sentence shall be stayed until the next court date.
- The following sentence(s) shall be stayed/continued to the next court date unless imposed or vacated today:

Sentence of <u>25</u> days in the Clark County Detention Center issued <u>12-24-19</u> is	_____ imposed _____ vacated _____ stayed
Sentence of _____ days in the Clark County Detention Center issued _____ is	_____ imposed _____ vacated _____ stayed
Sentence of _____ days in the Clark County Detention Center issued _____ is	_____ imposed _____ vacated _____ stayed
Sentence of _____ days in the Clark County Detention Center issued _____ is	_____ imposed _____ vacated _____ stayed
- Respondent to be released from custody on _____.
- Respondent may be released from the above sentence immediately upon payment of \$_____ to be released to Petitioner as child support.
- NO BAIL BENCH WARRANT HEREBY ISSUED FOR THE ARREST OF RESPONDENT. RESPONDENT MAY BE RELEASED UPON PAYMENT OF \$_____ TO BE RELEASED TO PETITIONER AS CHILD SUPPORT. Where circumstances justify a sufficient basis, the District Attorney may administratively quash or recall the bench warrant.

- BENCH WARRANT PREVIOUSLY ISSUED IS HEREBY QUASHED. CONTINUED.
- MODIFICATION OF PRIOR ORDER:

1 SUSPENSION OF LICENSES:

2 **PAYMENTS**

3 All mailed payments **MUST** be made in the form of a cashier's check, money order or business check **ONLY**, made payable to State Collection and Disbursement Unit (SCaDU).

4 Payments can be mailed to:

5 State Collection and Disbursement Unit (SCaDU)
 6 P.O. Box 98950
 Las Vegas, Nevada 89193-8950

7 Additionally, the following information must be included with each payment: name (first, middle, last) of person responsible for paying child support, social security number of person responsible for paying child support, child support case number, and name of petitioner (first and last name of person receiving child support).

9 **NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.**

10 Please visit www.clarkecountynv.gov/district-attorney for alternative payment options.

11 **NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT**

12 **NOTICE:** Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. If the Respondent pays support through income withholding and the full obligation is not met by the amount withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be subject to assessment of interest. The Respondent may avoid these additional costs by making current support payments each month. If another state takes jurisdiction and obtains a new order, Nevada interest will only be calculated to the date of the new order and will be enforced.

13 **NOTICE:** Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

14 **NOTICE:** Objections/Appeals are governed by EDCR 1.40(e) and (f). You have ten (10) days from receipt of this Master's Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final Order/Judgment being ordered by District Court.

15 **NOTICE:** Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written Notice of Entry of Judgment.

16 **NOTICE:** Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address, change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10) days of such change.

17 **NOTICE:** If you want to adjust the amount of child support established in this order, you **MUST** file a motion to modify the order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the child support obligation established in this order will continue until such time as all children who are the subject of this order reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18 years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the date the motion was filed.

18 Respondent to bring new financial statement and proof of income next date.

19 This order does not stay collection of support arrears by execution or any other means allowed by law.

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MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

District Attorneys Notice of Motion and Motion to Suspend Alex Ghibaudo's License to Practice Law In The State of Nevada is granted.

R indicated he has not retained counsel for this motion. No Opposition has been filed by R. R testified too busy to file Opposition to the Motion. R's oral argument this "punitive action". R testified as to P ability to support child. Court reminded R, pursuant to EDCR 2.20, an unopposed motion should be construed as meritorious and construed as the party having consented to the motion. R testified he is challenging the order as void.

DDA indicates: No child support payments in 2018. Only payments in 2019: May, 17,2019 and Dec, 13,2019. Only payments in 2020: Feb 18, 2020 and April 17,2020. R testified and denied the dates of the payments but does not deny he owes child support arrears.

R testified in agreement with the audit. P's attorney indicated agreement with the DAFS audit. Above arrears reduced to judgment.

On the merits, the Court finds, per NRS 425. 540 (1) and NRS 425. 560, that Respondent owes child support arrears for the emancipated child, Nicole, and that those arrears are in excess of \$1000. Court further finds that Respondent is delinquent for not less than 2 months in payments for the support of Nicole as ordered by the court.

Based on these findings, the court RECOMMENDS that, pursuant to NRS 425.560 (1)(b)(2): A court order be issued pursuant to subsection 1 to include the language that if Respondent does not within 30 days after the date on which this RECOMMENDATION becomes an order is issued, submit to the State Bar of Nevada a letter from the district attorney tha the Respondent has complied with or satisfied the arrearage pursuant to NRS 425.560, any professional or occupational license, certificate or permit issued pursuant to title 54 of NRS to the Respondent will be automatically suspended.

NEXT HEARING DATE IS OC in Courtroom in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: AUGUST 12, 2020

[Signature]
MASTER

- USJR DISPOSITIONS
- Settled/Withdrawn w/Judicial Conference/Hearing
 - Involuntary (Statutory) Dismissal
 - Dismissed / Want of Prosecution
 - Transferred to Another Jurisdiction
 - Other Manner of Dispo
 - Close Case

Respondent/Respondent's Attorney
Receipt of this document is
acknowledged by my signature.

ORDER/JUDGMENT

The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844. The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an ORDER/JUDGMENT of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. The parties are ordered to comply with this Order/Judgment.

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The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

IT IS HEREBY ORDERED that the Master's Recommendation IS affirmed and adopted as an ORDER/JUDGMENT of the District Court this _____ day of _____, 20_____.

IT IS HEREBY ORDERED that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20_____ and this matter is remanded to Child Support Court on _____, 20_____ at _____M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

By: *Steven Wolfson*
DEPUTY DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168

1 CSERV

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Tara Rae Kellogg-Ghibaudo,
7 Petitioner(s).

CASE NO: R-11-161999-R

8 vs.

DEPT. NO. Department H

9 Alex Brian Ghibaudo,
10 Respondent(s).

11 AUTOMATED CERTIFICATE OF SERVICE

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

15 Service Date: 12/17/2020

16 Clark County District Attorney Family Support	dafsefile@ClarkCountyDA.com
17 Laurie Alderman	lalderman@crdslaw.com
18 Alex Ghibaudo	alex@glawvegas.com
19 Leta Metz	assistant@crdslaw.com
20 R. Reade	creade@crdslaw.com
21 Andrew David	adavid@crdslaw.com
22 Michancy Cramer	michancy@glawvegas.com
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EXHIBIT “D”

EXHIBIT “D”

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- The total arrears are hereby confirmed.
- The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040.
- Arrears of \$_____ subject to modification until _____, and arrears of \$_____ reduced to judgment.
- Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.
-

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

Respondent's INCOME SHALL BE WITHHELD for the payment of support.

- Good cause to stay income withholding is based on:_____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.
- ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, # _____, is hereby confirmed and is the controlling order for the following reasons: only order _____.
- ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.
- Health insurance coverage for the minor child(ren) herein:
 - Respondent to provide; Petitioner to provide; Both Parties to provide;
 - If available through employer, shall provide per court order.
 - Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

ORDER TO SHOW CAUSE

Respondent understands that pursuant to prior orders he/she:

- REMAINS UNDER A SHOW CAUSE ORDER
- HAS STAYED JAIL SENTENCES OF:
 - Sentence of _____ days in the Clark County Detention Center issued _____.
 - Sentence of _____ days in the Clark County Detention Center issued _____.
 - Sentence of _____ days in the Clark County Detention Center issued _____.
 - Sentence of _____ days in the Clark County Detention Center issued _____.

BENCH WARRANT PREVIOUSLY ISSUED IS HEREBY QUASHED/RECALLED.

MODIFICATION OF PRIOR ORDER:

PAYMENTS

All mailed payments MUST be made in the form of a cashier's check, money order or business check ONLY, made payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are also accepted. Fees may apply.

Payments can be mailed to:

State Collection and Disbursement Unit (SCaDU)
P.O. Box 98950
Las Vegas, Nevada 89193-8950

Payments can be made in person at:

1 State Collection and Disbursement Unit (SCADU)
2 1900 East Flamingo Road
3 Las Vegas, Nevada 89119

4 Additionally, the following information must be included with each payment: name (first, middle, last) of person
5 responsible for paying child support, social security number of person responsible for paying child support, child
6 support case number, and name of petitioner (first and last name of person receiving child support).

7 NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.

8 NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.

9 NOTICE: Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant
10 to NRS 99.040. If the Respondent pays support through income withholding and the full obligation is not met by the amount
11 withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the
12 amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be
13 subject to assessment of interest. The Respondent may avoid these additional costs by making current support payments each
14 month. If another state takes jurisdiction and obtains a new order, Nevada interest will only be calculated to the date of the
15 new order and will be unenforced.

16 NOTICE: Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and
17 Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the
18 support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this
19 purpose may be obtained from D.A. Family Support at 1900 East Flamingo Road, Suite 100, Las Vegas, Nevada 89119.

20 NOTICE: Appeal from a Final Judgment by the Court is governed by NRS 4 and must be filed within 30 days of written
21 Notice of Entry of Judgment.

22 NOTICE: Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address,
23 change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10)
24 days of such change.

25 NOTICE: If you want to adjust the amount of child support established in this order, you MUST file a motion to modify the
26 order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the
27 child support obligation established in this order will continue until such time as all children who are the subject of this order
28 reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18
years of age, when the child graduates from high school or reaches 19 years of age, whichever occurs first. Unless the parties
agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the
date the motion was filed.

Respondant to bring new financial statement and proof of income next date.

This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS:

For settlement purposes and to resolve all remaining child support issues, the parties have agreed to a one time payment
in the amount of \$8,388.70 from Respondent to Petitioner. The payment shall be made through SCADU. Upon making
the payment, this child support case shall be CLOSED and the orders regarding the suspension of Respondent's law
license shall be vacated.

1 NEXT HEARING DATE IS O/C in Courtroom ___ in Child Support Court at the Child
2 Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further
3 proceedings.

4 **DECLARATION**

5 I declare under penalty of perjury under the law of the State of Nevada that I am the person named herein and that I have
6 signed this Order Upon Consent freely and voluntarily.

7 DATED: _____

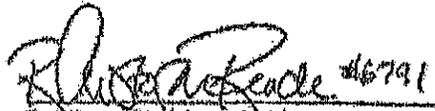
SEE 4B

Respondent/Respondent's Attorney
Receipt of this document is
acknowledged by my signature.

9 **DECLARATION**

10 I declare under penalty of perjury under the law of the State of Nevada that I am the person named herein and that I have
11 signed this Order Upon Consent freely and voluntarily.

12 DATED: January 13, 2021



Petitioner/Petitioner's Attorney
Receipt of this document is
acknowledged by my signature.

16 IT IS SO ORDERED: Dated this _____ day of _____, 20____.

SEE 4B

Deputy Court Judge, Family Division

19 STEVEN B. WOLFSON, Clark County District Attorney
20 Nevada Bar No. 001563

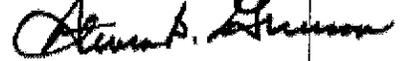
SEE 4B

21 By: _____
22 DEPUTY DISTRICT ATTORNEY
23 FAMILY SUPPORT DIVISION
24 1900 East Flamingo Road, Suite 100
25 Las Vegas, Nevada 89119

DATED: _____

EXHIBIT “E”

EXHIBIT “E”



1 **OPPC**
2 Michancy M. Cramer, Esq.
3 Nevada Bar No. 11545
4 **ALEX GHIBAUDO, PC**
5 197 E California Ave, Ste 250
6 Las Vegas, Nevada 89104
7 T: (702) 978-7090
8 F: (702) 924-6553
9 E: alex@glawvegas.com
10 *Attorney for Alex Ghibaud*

11 **EIGHTH JUDICIAL DISTRICT COURT**
12 **FAMILY DIVISION**
13 **CLARK COUNTY, NEVADA**

14 TARA KELLOGG,
15
16 Plaintiff,

Case Number: D-15-522043-D/
R-11-161999-R

17 vs.

Department: H/CS

18 ALEX GHIBAUDO,
19
20 Defendant.

21 **OPPOSITION TO PLAINTIFF'S MOTION; COUNTERMOTION FOR**
22 **SANCTIONS AND ATTORNEY FEES AND COSTS**

23 COMES NOW, Defendant, ALEX GHIBAUDO, by and through his
24 attorney, MICHANCY M. CRAMER, ESQ., of ALEX GHIBAUDO, P.C., and
25 hereby files this *Opposition to Plaintiff's Motion; Countermotion for Sanctions*
26 *and Attorney Fees and Costs.*

27 This *Opposition and Countermotion* is based upon the attached
28 Memorandum of Points and Authorities, any and all pleadings and papers on file