

IN THE SUPREME COURT OF THE STATE OF NEVADA

INDICATE FULL CAPTION:

JEFFREY REED,
Appellant,

v.

ALECIA DRAPER (Ind./Conserv.),
Respondent,

No. 82575
Electronically Filed
Apr 19 2021 10:56 a.m.
Elizabeth A. Brown
Clerk of Supreme Court
DOCKETING STATEMENT
CIVIL APPEALS

GENERAL INFORMATION

Appellants must complete this docketing statement in compliance with NRAP 14(a). The purpose of the docketing statement is to assist the Supreme Court in screening jurisdiction, identifying issues on appeal, assessing presumptive assignment to the Court of Appeals under NRAP 17, scheduling cases for oral argument and settlement conferences, classifying cases for expedited treatment and assignment to the Court of Appeals, and compiling statistical information.

WARNING

This statement must be completed fully, accurately and on time. NRAP 14(c). The Supreme Court may impose sanctions on counsel or appellant if it appears that the information provided is incomplete or inaccurate. *Id.* Failure to fill out the statement completely or to file it in a timely manner constitutes grounds for the imposition of sanctions, including a fine and/or dismissal of the appeal.

A complete list of the documents that must be attached appears as Question 27 on this docketing statement. Failure to attach all required documents will result in the delay of your appeal and may result in the imposition of sanctions.

This court has noted that when attorneys do not take seriously their obligations under NRAP 14 to complete the docketing statement properly and conscientiously, they waste the valuable judicial resources of this court, making the imposition of sanctions appropriate. *See KDI Sylvan Pools v. Workman*, 107 Nev. 340, 344, 810 P.2d 1217, 1220 (1991). Please use tab dividers to separate any attached documents.

1. Judicial District : Eighth Department : H
County : Clark Judge T. Arthur Ritchie
District Ct. Case No. 05D338668

2. Attorney filing this docketing statement:

Attorney : Amanda M. Roberts, Esq. Telephone (702) 474-7007
Firm : Roberts Stoffel Family Law Group
Address 4411 South Pecos Road
Las Vegas, Nevada 89121

Client(s) : Jeffrey Reed

If this is a joint statement by multiple appellants, add the names and addresses of other counsel and the names of their clients on an additional sheet accompanied by a certification that they concur in the filing of this statement.

3. Attorney(s) representing respondents(s):

Attorney : Elizabeth Brennan Telephone (702) 834-888
Firm Brennan Law Firm
Address
1980 Festival Plaza Drive, Suite 300
Las Vegas, Nevada 89135

Client(s) Alecia Draper as conservator for Emily Reed

Attorney Benamin La Luzerne Telephone (702) 268-5708
Firm La Luzerne Law
Address 2449 N. Tenaya Way, #36306
Las Vegas, Nevada 89128

Client(s) Alecia Draper, Individually

(List additional counsel on separate sheet if necessary)

4. Nature of disposition below (check all that apply):

- | | |
|--|---|
| <input checked="" type="checkbox"/> Judgment after bench trial | <input type="checkbox"/> Dismissal: |
| <input type="checkbox"/> Judgment after jury verdict | <input type="checkbox"/> Lack of jurisdiction |
| <input type="checkbox"/> Summary judgment | <input type="checkbox"/> Failure to state a claim |
| <input type="checkbox"/> Default judgment | <input type="checkbox"/> Failure to prosecute |
| <input type="checkbox"/> Grant/Denial of NRCP 60(b) relief | <input type="checkbox"/> Other (specify): _____ |
| <input type="checkbox"/> Grant/Denial of injunction | <input type="checkbox"/> Divorce Decree: |
| <input type="checkbox"/> Grant/Denial of declaratory relief | <input type="checkbox"/> Original <input type="checkbox"/> Modification |
| <input type="checkbox"/> Review of agency determination | <input type="checkbox"/> Other disposition (specify): _____ |

5. Does this appeal raise issues concerning any of the following?

- ☐ Child Custody
- ☐ Venue
- ☐ Termination of parental rights

6. Pending and prior proceedings in this court. List the case name and docket number of all appeals or original proceedings presently or previously pending before this court which are related to this appeal:

Reed v. Eighth Judicial District Court, et. al. (81581), it was a Writ prior to the commencement of Trial in this matter.

7. Pending and prior proceedings in other courts. List the case name, number and court of all pending and prior proceedings in other courts which are related to this appeal (e.g., bankruptcy, consolidated or bifurcated proceedings) and their dates of disposition:

None.

8. Nature of the action. Briefly describe the nature of the action and the result below:

This action is brought by an adult daughter for child support due to a disability when she was twenty-two (22) years old.

9. Issues on appeal. State concisely the principal issue(s) in this appeal (attach separate sheets as necessary):

1. Whether a request for support beyond the age of majority under NRS 125B.110 can be brought after a child reaches the age of majority.

2. Whether Jeffrey Reed should have been given the opportunity to retain a rebuttal witness after all documents had been disclosed Alecia Draper (individually and as Emily's conservator).

3. Whether Jeffrey Reed should have been given the opportunity to recall Emily Reed as a witness after the testimony of the expert for Alecia Draper (individually and as Emily's conservator) was questioned regarding her testimony.

SEE ATTACHED ADDITIONAL SHEET

10. Pending proceedings in this court raising the same or similar issues. If you are aware of any proceedings presently pending before this court which raises the same or similar issues raised in this appeal, list the case name and docket numbers and identify the same or similar issue raised:

None..

11. Constitutional issues. If this appeal challenges the constitutionality of a statute, and the state, any state agency, or any officer or employee thereof is not a party to this appeal, have you notified the clerk of this court and the attorney general in accordance with NRAP 44 and NRS 30.130?

☒ N/A

☐ Yes

☐ No

If not, explain:

12. Other issues. Does this appeal involve any of the following issues?

☐ Reversal of well-settled Nevada precedent (identify the case(s))

☐ An issue arising under the United States and/or Nevada Constitutions

☒ A substantial issue of first impression

☒ An issue of public policy

☐ An issue where en banc consideration is necessary to maintain uniformity of this court's decisions

☐ A ballot question

If so, explain: The issue involves _____

13. Assignment to the Court of Appeals or retention in the Supreme Court. Briefly set forth whether the matter is presumptively retained by the Supreme Court or assigned to the Court of Appeals under NRAP 17, and cite the subparagraph(s) of the Rule under which the matter falls. If appellant believes that the Supreme Court should retain the case despite its presumptive assignment to the Court of Appeals, identify the specific issue(s) or circumstance(s) that warrant retaining the case, and include an explanation of their importance or significance:

This matter should be maintained by the Supreme Court pursuant to NRAP 17 (a)(11) and (12). The case involves a request for support of an adult child which was brought once adulthood was reached.

14. Trial. If this action proceeded to trial, how many days did the trial last? 4

Was it a bench or jury trial? Bench Trial.

15. Judicial Disqualification. Do you intend to file a motion to disqualify or have a justice recuse him/herself from participation in this appeal? If so, which Justice?

TIMELINESS OF NOTICE OF APPEAL

16. Date of entry of written judgment or order appealed from 1/28/2021

If no written judgment or order was filed in the district court, explain the basis for seeking appellate review:

17. Date written notice of entry of judgment or order was served Jan 28, 2021

Was service by:

☐ Delivery

☒ Mail/electronic/fax

18. If the time for filing the notice of appeal was tolled by a post-judgment motion (NRCP 50(b), 52(b), or 59)

(a) Specify the type of motion, the date and method of service of the motion, and the date of filing.

☐ NRCP 50(b) Date of filing _____

☐ NRCP 52(b) Date of filing _____

☐ NRCP 59 Date of filing _____

NOTE: Motions made pursuant to NRCP 60 or motions for rehearing or reconsideration may toll the time for filing a notice of appeal. See AA Primo Builders v. Washington, 126 Nev. ____, 245 P.3d 1190 (2010).

(b) Date of entry of written order resolving tolling motion / / 2019

(c) Date written notice of entry of order resolving tolling motion was served / / 2019

Was service by:

☐ Delivery

☐ Mail

19. Date notice of appeal filed Feb 26, 2021

If more than one party has appealed from the judgment or order, list the date each notice of appeal was filed and identify by name the party filing the notice of appeal:

20. Specify statute or rule governing the time limit for filing the notice of appeal, e.g., NRAP 4(a) or other

NRAP 4 (a)(1)

SUBSTANTIVE APPEALABILITY

21. Specify the statute or other authority granting this court jurisdiction to review the judgment or order appealed from:

(a)

☒ NRAP 3A(b)(1)

☐ NRS 38.205

☐ NRAP 3A(b)(2)

☐ NRS 233B.150

☐ NRAP 3A(b)(3)

☐ NRS 703.376

☐ Other (specify) _____

(b) Explain how each authority provides a basis for appeal from the judgment or order:
The Orders being appealed are final Orders.

22. List all parties involved in the action or consolidated actions in the district court:

(a) Parties:

Appellant/Defendant, Jeffrey Reed; and
Respondent/Plaintiff and Intervenor, Alecia Draper (individually and as
conservator for Emily Reed).

(b) If all parties in the district court are not parties to this appeal, explain in detail why those parties are not involved in this appeal, *e.g.*, formally dismissed, not served, or other:

23. Give a brief description (3 to 5 words) of each party's separate claims, counterclaims, cross-claims, or third-party claims and the date of formal disposition of each claim.

The Respondent is seeking child support for an adult child beyond the age of majority. The request was brought when the adult child was over nineteen (19) years old.

The Appellant believes the request was barred by the age when the request was brought.

24. Did the judgment or order appealed from adjudicate ALL the claims alleged below and the rights and liabilities of ALL the parties to the action or consolidated actions below?

☒ Yes

☐ No

25. If you answered "No" to question 24, complete the following:

(a) Specify the claims remaining pending below:

(b) Specify the parties remaining below:

(c) Did the district court certify the judgment or order appealed from as a final judgment pursuant to NRCP 54(b)?

☐ Yes

☐ No

(d) Did the district court make an express determination, pursuant to NRCP 54(b), that there is no just reason for delay and an express direction for the entry of judgment?

☐ Yes

☐ No

26. If you answered "No" to any part of question 25, explain the basis for seeking appellate review (*e.g.*, order is independently appealable under NRAP 3A(b)):

27. Attach file-stamped copies of the following documents:

- The latest-filed complaint, counterclaims, cross-claims, and third-party claims
- Any tolling motion(s) and order(s) resolving tolling motion(s)
- Orders of NRCP 41(a) dismissals formally resolving each claim, counterclaims, cross-claims and/or third-party claims asserted in the action or consolidated action below, even if not at issue on appeal
- Any other order challenged on appeal
- Notices of entry for each attached order

VERIFICATION

I declare under penalty of perjury that I have read this docketing statement, that the information provided in this docketing statement is true and complete to the best of my knowledge, information and belief, and that I have attached all required documents to this docketing statement.

Jeffrey Reed
Name of appellant

Amanda M. Roberts, Esq.
Name of counsel of record

Apr 19, 2021
Date

Amanda M. Roberts
Signature of counsel of record

State of Nevada, County of Clark
State and county where signed

CERTIFICATE OF SERVICE

I certify that on the 19th day of April, 2021, I served a copy of this completed docketing statement upon all counsel of record:

- ☐ By personally serving it upon him/her; or
- ☒ By mailing it by first class mail with sufficient postage prepaid to the following address(es): (NOTE: If all names and addresses cannot fit below, please list names below and attach a separate sheet with the addresses.)

SEE ATTACHED

Dated this 19th day of April, 2021

Amanda M. Roberts
Signature

Additional Issues On Appeal:

4. Whether income was properly imputed to the parents.
5. Whether the Court's findings are supported by the record.
6. Whether the alleged expenses for Emily Reed are reasonable.

Certificate of Service:

Service was made on the 19th day of April, 2021, to the following:

Elizabeth Brennan, Esq.
1980 Festival Plaza Drive, Suite 300
Las Vegas, Nevada 89135
Alecia Draper as conservator for Emily Reed

Benjamin La Luzerne, Esq.
2449 N. Tenaya Way, #36306
Las Vegas, Nevada 89128
Alecia Draper, Individually

ORIGINAL

FILED

JUN 14 2 30 PM '05

Shirley J. ...
CLERK

1 COMD
2 Law Offices of Douglas C. Crawford
3 DOUGLAS C. CRAWFORD, ESQ.
4 Nevada Bar No. 000181
5 602 South Tenth Street
6 Las Vegas, Nevada 89101
7 (702) 383-0090

8 Attorney for Plaintiff

9 DISTRICT COURT, FAMILY DIVISION

10 CLARK COUNTY, NEVADA

11 ALECIA ANN REED,)

12 Plaintiff,)

13 vs.)

14 JEFFREY A. REED,)

15 Defendant.)

CASE NO:

DEPT NO:

DATE OF HEARING:

TIME OF HEARING:

D338668
J

16 COMPLAINT FOR DIVORCE

17 COMES NOW Plaintiff, ALECIA ANN REED, by and through her attorney,
18 DOUGLAS C. CRAWFORD, ESQ., and for her Complaint for Divorce against the
19 Defendant, JEFFREY A. REED, complains and alleges as follows:
20

21 I.

22 At all times relevant, Plaintiff was, and for at least six weeks prior to the
23 commencement of this action, is a resident of Clark County, Nevada and has the
24 intention of making the State of Nevada her permanent domicile for the foreseeable
25 future.

26 **RECEIVED**

27 **JUN 14 2005**

28 **COUNTY CLERK**

1 II.

2 At all times herein relevant, Defendant, JEFFREY A. REED was and is a resident
3 of Clark County, Nevada

4 III.

5 Plaintiff and Defendant were married to each other September 14, 1996, in
6 Laguna Beach, California.

7 IV.

8 There are three minor children born to the parties as a result of their relationship,
9 namely, Emily Christine Reed, born: November 16, 1996; Anthony Jeffrey Reed, born:
10 May 26, 1999; and, Adam Parker Reed, born: January 23, 2001. The parties have not
11 adopted any minor children before or during their marriage and the Plaintiff is not now
12 pregnant.
13

14 V.

15 The parties are fit and proper parents to have joint legal custody of their minor
16 children, with Plaintiff having primary physical custody, subject to Defendant's right of
17 supervised visitation. That Defendant complete parenting classes and anger
18 management.
19

20 VI.

21 That Defendant pay child support of \$100.00 per child, per month, or, 29% of his
22 gross monthly income, whichever is greater, pursuant to NRS125B.070. That
23 Defendant provide health insurance for the minor children with the parties equally
24 paying for any of the children's unpaid or un-reimbursed medical expenses.

25 VII.

26 That Plaintiff have an award of spousal support.
27
28

1 VIII.

2 That Plaintiff have as her sole and separate property the business known as
3 "Little Pastry Chefs".

4 That Plaintiff have exclusive possession of the marital residence located at:
5 2029 Riva Del Garda Place, Las Vegas, Nevada, 89134.

6 There is community property and there are community debts to be adjudicated by
7 this court the full extent to which Plaintiff has yet to determine. Plaintiff reserves the
8 right to amend this Complaint as community property or community debts are later
9 discovered that are not now known by Plaintiff. The Court should make a fair and
10 equitable distribution of the community assets and community obligations.

11 IX.

12 The parties are incompatible in marriage.

13 X.

14 That Plaintiff be awarded her costs and disbursements, including reasonable
15 attorney's fees, incurred herein.

16 **WHEREFORE, Plaintiff prays for judgment as follows:**

17 1. That the bonds of matrimony now existing between the parties be
18 dissolved and the parties be returned to the status of single unmarried persons.

19 2. That the parties have joint legal custody of their minor children, with
20 Plaintiff having primary physical custody, subject to Defendant's right of supervised
21 visitation. That Defendant complete parenting classes and anger management.

22 3. That Defendant pay child support of \$100.00 per child, per month, or, 29%
23 of his gross monthly income, whichever is greater. That Defendant provide health
24 insurance for the minor children and that the parties equally divide and pay any unpaid
25 medical expenses of the minor children.

26 4. That Plaintiff have an award of spousal support.

27 5. That Plaintiff have as her sole and separate property the business known
28 as "Little Pastry Chefs".

1 5. That Plaintiff have as her sole and separate property the business known
2 as "Little Pastry Chefs".
3

4 6. Plaintiff have exclusive possession of the marital residence located at:
5 2029 Riva Del Garda Place, Las Vegas, Nevada, 89134.

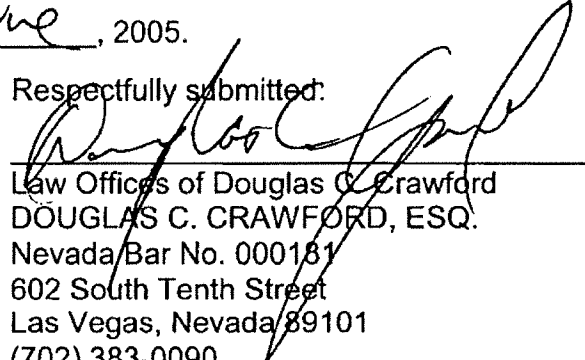
6 7. That the court equitably divide the community assets and obligations of
7 the parties.

8 8. That Plaintiff be awarded her costs, disbursements and reasonable
9 attorney's fees.

10 9. For such other and further relief as the court may deem just and proper.

11 DATED this 14th day of June, 2005.

12 Respectfully submitted:

13 
14 _____
15 Law Offices of Douglas C. Crawford
16 DOUGLAS C. CRAWFORD, ESQ.
17 Nevada Bar No. 000181
18 602 South Tenth Street
19 Las Vegas, Nevada 89101
20 (702) 383-0090
21 Attorney for Plaintiff
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VERIFICATION

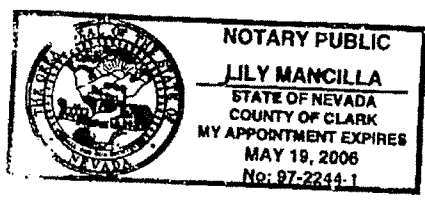
STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

ALECIA ANN REED, under penalties of perjury, being first duly sworn, deposes and says:

That she is the Plaintiff in the above-entitled action; that she has read the foregoing COMPLAINT FOR DIVORCE and knows the contents thereof; that the same is true of her own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, she believes them to be true.

Alecia Ann Reed
ALECIA ANN REED

SUBSCRIBED and SWORN to before me
this 9th day of June, 2005.
[Signature]
NOTARY PUBLIC in and for said County and State



ORIGINAL

52

1 ANS
2 JEFFREY A. REED
3 2029 Riva Del Garda Place
4 Las Vegas, NV 89134
5 (702) 241-2486
6 Defendant in proper person

FILED

JUL 29 4 49 PM '05

Shirley B. Pangloss
CLERK

DISTRICT COURT, FAMILY DIVISION

CLARK COUNTY, NEVADA

8 ALECIA ANN REED,) Case No. : D338668
9)
10 Plaintiff,) Dept. No. : J
11)
12 vs.)
13)
14 JEFFREY A. REED,)
15)
16 Defendant.)

ANSWER IN PROPER PERSON

17 Comes Now JEFFREY A. REED, Defendant in proper person and hereby files
18 his answer to the Plaintiff's Complaint on file herein.

19 As to the allegations in paragraphs I, II, III, IV, VI and VIII, Defendant admits the
20 allegations contained therein.

21 As to the allegations in paragraphs V, VII, IX and X, Defendant denies the
22 allegations contained therein.

23 Wherefore, Defendant prays that Plaintiff take nothing by reason of her
24 complaint on file herein and that judgment be entered for Defendant in this matter.

Dated this 27TH day of July, 2005.

Jeffrey A. Reed
JEFFREY A. REED
2029 Riva Del Garda Place
Las Vegas, NV 89134
(702) 241-2486
Defendant in proper person

RECEIVED

CLERK

FILED

AUG 5 1 19 PM '05

Handwritten signature
CLERK

1 DECD
2 Law Offices of Douglas C. Crawford
3 DOUGLAS C. CRAWFORD, ESQ.
4 Nevada Bar No. 000181
5 602 South Tenth Street
6 Las Vegas, Nevada 89101
7 (702) 383-0090

8 Attorney for Plaintiff

9 DISTRICT COURT, FAMILY DIVISION

10 CLARK COUNTY, NEVADA

11 ALECIA ANN REED,)	Case No.	:	D338668
12 Plaintiff,)	Dept. No.	:	J
13 vs.)			
14 JEFFREY A. REED,)			
15 Defendant.)			

16 DECREE OF DIVORCE

17 A Complaint for Divorce having been filed by Plaintiff, ALECIA ANN REED,
18 appearing by and through her attorney, DOUGLAS C. CRAWFORD, ESQ. and the
19 Defendant, JEFFREY A. REED, appearing in proper person and having filed an
20 Answer, the parties have settled all issues, and after reviewing the pleadings on file
21 herein and otherwise being fully advised in the premises, the Court Finds it has
22 complete jurisdiction, both as to the subject matter herein as well as the parties herein;
23 Plaintiff ALECIA ANN REED is now, and has been, an actual and bona fide resident of
24 the County of Clark, State of Nevada, and has been actually domiciled therein for more
25 than six weeks immediately preceding the commencement of this action; the Parties
26 were married in Laguna Beach, California on September 14, 1996; the Parties have
27 freely and voluntarily agreed to custody and visitation of their minor children, as well as
28 distribution of their community assets and debts.

1 This Court Also Finds that all of the allegations contained in Plaintiff's Complaint
2 are true as therein alleged and that Plaintiff is entitled to a Decree of Divorce from the
3 Defendant on the ground as set forth in Plaintiff's Complaint; and that Defendant has
4 waived Findings of Fact, Conclusions of Law and written Notice of Entry of Judgment in
5 said cause.

6 THE COURT ALSO FINDS:

7 That the parties have three (3) minor children, to wit:

8 EMILY CHRISTINE REED, born November 16, 1996;

9 ANTHONY JEFFREY REED, born May 26, 1999; and

10 ADAM PARKER REED, born January 23, 2001.

11 and that the Defendant is the natural father of said children. That Plaintiff is not now
12 pregnant, nor are there any minor children adopted by the parties hereto.

13 That the parties have met, negotiated and stipulated to the relief to be entered in
14 this action by direct negotiations with one another, and through their respective counsel,
15 if applicable, and by way of their agreement have resolved all issues relating to their
16 marriage, including providing for division and allocation of their respective separate
17 property, their community property, and their debts and by the waiver by each party of
18 any right to request or pursue support from the other, except as herein provided.

19 That the terms of this Decree of Divorce have been made and entered into freely
20 and voluntarily by each of the parties herein, free from any duress, constraint, or
21 influence of any kind or nature on the part of the other and acting absolutely upon the
22 independent judgment of each, or as advised by independent counsel.

23 That the parties have each agreed that if any claim, action or proceeding is
24 brought seeking to hold the other party liable on account of any debt, obligation, liability,
25 act or omission assumed by the other party, such party will, at his or her sole expense,
26 defend the other against any such claim or demand and that he or she will indemnify,
27 defend and hold harmless the other party, as specifically provided for below.

28 ///

1 That the parties each have verified to the other that they have made a full
2 investigation and disclosure to the other of the joint, common and community property
3 and all debts known to them.

4 That the parties each have verified that they are aware of their respective rights
5 to alimony or spousal support and to any share of any pensions or retirement benefits
6 now or in the future, and they hereby waive said rights, except as specifically provided
7 below. Nevertheless, they waive any right to assert any other claim of any kind,
8 sounding in contract, tort, or other field of law, understanding that this waiver is
9 permanent and that they may not petition the court for such relief in the future, this
10 Decree of Divorce being intended as a final settlement of all such actual, potential, or
11 latent claims, whether known or unknown. They each have agreed to seek no monetary
12 award, or any other remedy or benefit that would be in conflict with or in addition to what
13 they agreed upon in this instrument, and have agreed that a copy of the Decree of
14 Divorce shall be offered into evidence in any further proceedings between the parties, or
15 in any suit between the parties.

16 That the parties have agreed that the provisions in this Decree of Divorce are
17 equitable, fair and reasonable and agreed to be bound by all its terms. The parties
18 have further acknowledged that they have made an independent investigation into the
19 existence and value of the assets and liabilities divided hereunder, and that upon their
20 direction the LAW OFFICES OF DOUGLAS C. CRAWFORD have not conducted an
21 investigation or analysis of said assets and liabilities. The parties have waived any and
22 all claims against said attorneys or their law firms related to the value and/or existence
23 of any asset or debt divided or distributed hereunder.

24 **NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED**
25 that the bonds of matrimony heretofore and now existing between Plaintiff and
26 Defendant be, and the same are hereby wholly dissolved, and an absolute Decree of
27 Divorce is hereby granted to the Plaintiff, and each of the parties hereto is hereby
28 restored to the status of a single, unmarried person.

1 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Court
2 acknowledges that there are three (3) minor children born the issue of the parties
3 hereto, to wit:

4 EMILY CHRISTINE REED, born November 16, 1996;

5 ANTHONY JEFFREY REED, born May 26, 1999; and

6 ADAM PARKER REED, born January 23, 2001.

7 and that Nevada is the home state of the children and the United States of America is
8 the habitual residence of the children.

9 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that there are no
10 adopted children of the parties, nor is the Plaintiff now pregnant.

11 **LEGAL CUSTODY PROVISIONS**

12 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Plaintiff and
13 Defendant are awarded joint legal custody of the minor children, which entails the
14 following:

15 The parents shall consult and cooperate with each other in substantial questions
16 relating to religious upbringing, education programs, significant changes in social
17 environment, and health care of the child.

18 The parents shall have access to medical and school records pertaining to their
19 children and be permitted to independently consult with any and all professionals
20 involved with the child.

21 All schools, health care providers, day care providers and counselors shall be
22 selected by the parents jointly. In the event that the parents cannot agree to the
23 selection of a school, the children shall be maintained in the present school
24 pending mediation and/or further Order of the Court.

25 Each parent shall be empowered to obtain emergency health care for the
26 children without the consent of the other parent. Each parent is to notify the other
27 parent as soon as reasonably possible of any illness requiring medical attention,
28 or any emergency involving the child.

1 Each parent is to provide the other parent, upon receipt, information concerning
2 the well being of the child, including, but not limited to, copies of report cards;
3 school meeting notices; vacation schedules; class programs; requests for
4 conferences; results of standardized or diagnostic tests; notices of activities
5 involving the child; samples of school work; order forms for school pictures; all
6 communications from health care providers; the names, addresses, and
7 telephone numbers of all schools; health care providers, and counselors.

8 Each parent is to advise the other parent of school, athletic, and social events in
9 which the children participate. Both parents may participate in activities for the
10 child, such as open house, attendance at an athletic event, etc.

11 Each parent is to provide the other parent with the address and telephone
12 number at which the minor children reside, and to notify the other parent within
13 ten days prior to any change of address and provide the telephone number as
14 soon as it is assigned.

15 Each parent is to provide the other parent with a travel itinerary and, whenever
16 reasonably possible, telephone numbers at which the children can be reached
17 whenever the children will be away from the parent's home for a period of 48
18 hours or more.

19 Each parent shall be entitled to reasonable telephone communication with the
20 child. Each parent is restrained from unreasonably interfering with the child's
21 rights to privacy during such telephone conversations.

22 PHYSICAL CUSTODY PROVISIONS

23 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Plaintiff is
24 awarded primary physical custody of the minor children and the Defendant shall have
25 the following visitation with the minor children:

26 Every Thursday from after school (or 3:00 p.m. if the children are not in school)
27 through Saturday at 8:00 p.m.

28 The children shall reside with Plaintiff at all other times.

1 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that each party
2 shall be responsible for providing day care services for the minor children, if needed,
3 during their visitation times with said minor children and such party shall pay the cost
4 thereof.

5 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that, in light of the
6 parties' agreement and understanding, should the parties' work schedules change, they
7 agree to communicate to attempt to formulate a new parenting agreement providing for
8 an equal time-share with the child.

9 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that holiday visitation
10 shall supersede the normal visitation schedule and that holiday visitation shall be as
11 follows:

12 **Halloween / Nevada Day:** Halloween shall be defined as being between 3:00
13 p.m. and 9:00 p.m. on October 31st unless such date is not a school day and in such
14 case Halloween shall be defined as commencing at 6:00 p.m. on October 30th and
15 concluding at 9:00 p.m. on October 31st. The parties shall alternate Halloween with the
16 Plaintiff having such visitation during odd numbered years and Defendant having such
17 visitation during even numbered years.

18 **Thanksgiving:** Thanksgiving shall be defined as commencing at 3:00 p.m. on
19 the Wednesday immediately preceding Thanksgiving Day and concluding at 6:00 p.m.
20 on the Sunday immediately following Thanksgiving Day. The parties shall alternate
21 Thanksgiving with the Plaintiff having such visitation during even numbered years and
22 Defendant having such visitation during odd numbered years.

23 **Christmas/ Winter Break:** The parties shall alternate Winter Break with the
24 Plaintiff having such visitation during odd numbered years and Defendant having such
25 visitation during even numbered years, so that each parent may be able to travel out of
26 town with the children every other year and if a parent has plans to travel out of town
27 with the children during Winter Break, then Winter Break shall be defined as
28 commencing at the end of school on the last day of school before the Winter Break,

1 according to the calendar of the Clark County School District and concluding at 6:00
2 p.m. on the day immediately preceding the return to school after January 1st, according
3 to the calendar of the Clark County School District.

4 Nevertheless, if the parent having such Winter Break in any given year will not be
5 traveling out of town with the children, then such Winter Break shall be divided into two
6 parts, and the Plaintiff shall exercise visitation during odd numbered years (and
7 Defendant during even numbered years) from the end of school on the last day of
8 school before the Winter Break, according to the calendar of the Clark County School
9 District until 12:00 noon on Christmas day. During such years, Defendant shall exercise
10 visitation during odd numbered years (and Plaintiff during even numbered years) from
11 12:00 noon on Christmas day until 6:00 p.m. on the day immediately preceding the
12 return to school after January 1st, according to the calendar of the Clark County School
13 District

14 **Easter/ Spring Break:** Spring Break shall be defined as commencing at 3:00
15 p.m. on the last day of school before the Winter Break, according to the calendar of the
16 Clark County School District and concluding at 6:00 p.m. on the day immediately
17 preceding the return to school after Spring Break, according to the calendar of the Clark
18 County School District. The parties shall alternate Spring Break with the Plaintiff having
19 such visitation during even numbered years and Defendant having such visitation during
20 odd numbered years.

21 Plaintiff shall exercise visitation during Spring Break, during odd numbered years
22 and Defendant shall exercise visitation during Spring Break during even numbered
23 years.

24 **Mother's Day Weekend:** Plaintiff shall exercise visitation every year from the
25 end of school on Friday until 8:00 p.m. on Sunday.

26 **Father's Day Weekend:** Defendant shall exercise visitation every year and his
27 normal weekend visitation shall be extended until 8:00 p.m. on Sunday.

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1 **July 4th**: Defendant shall exercise visitation during odd numbered years; Plaintiff
2 shall exercise visitation during even numbered years. Visitation shall occur from 9:00
3 a.m. through 9:00 p.m. on July 4th.

4 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that each party shall
5 be entitled to exercise two weeks of uninterrupted vacation with the minor children. The
6 party requesting the visitation must provide the other party at least thirty (30) days
7 advance written notice.

8 **ADDITIONAL TIME**

9 Any additional time with the children shall be by mutual agreement of both
10 parents.

11 **TRANSPORTATION**

12 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the responsibility
13 for providing transportation shall be assumed by both parties and shared equally.

14 **SPECIAL PROVISIONS**

15 The parents agree to communicate directly regarding the needs and well- being
16 of their children and agree not to use the children as communicators regarding parental
17 issues.

18 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the terms and
19 conditions of the parties' parenting plan may be modified, in writing, as the needs of the
20 minor children and/or the circumstances of the parents change. However, the parents
21 understand that the concurred changes do not modify this Court Order. The parents are
22 encouraged to utilize mediation to resolve parenting issues prior to seeking Court
23 intervention

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IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that Defendant's gross monthly income is currently \$1,290.00 and the parties agree that the Defendant is expected to be earning approximately \$3,000.00 in gross monthly income very soon and therefore, child support shall be based upon said gross monthly income of \$3,000.00.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that in light of the fact that Defendant will be providing health insurance coverage for the minor children and in light of the timeshare of the parties and the resulting fact that Defendant will be providing clothing for the minor children while they are in his care, the parties agree that there shall be a deviation from the above amounts in the amount of \$270.00 monthly and therefore, Defendant shall pay to Plaintiff the amount of \$600.00 per month as and for the support of the minor children of the parties herein.

-9-

1 obligation shall commence in August, 2008 and such amount shall be due and payable
2 on the 1st day of each month, commencing August 1, 2008 and continuing monthly
3 thereafter, until modified by order of the court.

4 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that the child
5 support obligation herein, shall continue until the youngest minor child reaches the age
6 of majority (currently 18 years of age), or 19 years of age, if the child is still enrolled in
7 high school, whichever is later, unless the child is otherwise emancipated accordingly to
8 law.

9 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that the parties may
10 request a review of the child support obligation every three (3) years.

11 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that the party
12 responsible for paying child support is hereby put on notice that he/she is subject to the
13 provisions of N.R.S. 31A.010 through 31A.240 and Sections 2 and 3 of Assembly Bill
14 No. 395, which deal with the recovery of payments for the support of children by the
15 welfare division of the Department of Human Resources or the District Attorney, and
16 that his/her employer can be ordered to withhold his/her wages or commissions for
17 delinquent payments of child support, and that the County Clerk may collect and
18 disburse those withholdings.

19 **HEALTH INSURANCE**

20 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that Defendant shall
21 maintain health care insurance, including medical, dental and surgical for the minor
22 children and the cost of such insurance coverage for the minor children shall be the
23 responsibility of Defendant.

24 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that Plaintiff and
25 Defendant shall divide equally all unreimbursed health care expenses for the subject
26 minor child in accordance with the following procedure:

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1 The party that incurs an out of pocket and/or un-reimbursed (not covered by the
2 policy) medical, dental and optical expense for the minor child, shall submit proof
3 of payment or payment due to the other party within thirty (30) days of receipt
4 and the other party shall have thirty (30) days to reimburse the party that
5 acquired said expense.

6 **CLAIMING THE MINOR CHILDREN FOR INCOME TAXES**

7 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that for tax year
8 2004, the parties shall file a joint federal income tax return and equally divide the
9 amount of any refund and the parties shall be equally responsible for any tax liability
10 that may be due for tax year 2004.

11 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that commencing for
12 tax year 2005, the parties shall file separate tax returns and Plaintiff shall be entitled to
13 claim the minor children for all purposes of her Federal Income Taxes (including, but not
14 limited to exemptions, credits or other allowances) for tax year 2005 and each year
15 thereafter.

16 **WAIVER OF ALIMONY**

17 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that based upon the
18 waiver of the parties, that there shall be no award of alimony to either party.

19 **DISTRIBUTION OF COMMUNITY ASSETS AND DEBTS**

20 **1. MARITAL RESIDENCE & PROPERTY EQUALIZING PAYMENT:**

21 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Plaintiff shall be
22 awarded all right, title and interest in the real property located at 2029 Riva Del Garda
23 Place, Las Vegas, NV 89134 as her sole and separate property with all rights of quiet
24 enjoyment therein and she shall hold the Defendant harmless from any obligations
25 associated therewith.

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1 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that Plaintiff shall
2 pay to Defendant the amount of \$69,100 as and for his interest in said residence and as
3 an equalizing payment for the property distribution stated hereinbelow. Plaintiff shall
4 pay \$69,1000 according to the following schedule:

5 \$47,500.00 lump sum payment upon the filing of this Decree of Divorce; and

6 \$21,600.00 to be paid in monthly installments of \$600.00 per month for thirty-six

7 (36) months, commencing August, 2005.

8 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that said monthly
9 payments shall be offset by Defendant's monthly child support obligation for thirty-six
10 (36) months and therefore, during said period of time, neither party shall pay the other
11 since such amounts would create a "wash" between the parties. Therefore, said debt
12 shall be paid in full in July, 2008.

13 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that Defendant shall
14 be able to occupy the Riva Del Garda Place residence up to November 30, 2005.

15 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that Plaintiff shall be
16 be responsible for payment of the monthly mortgage, insurance, property taxes and all
17 utilities (i.e. electricity, natural gas, water, refuse/recycling, cable, internet), associated
18 with said property and that if Defendant intends to "shut-off" any utilities prior to or after
19 vacating said residence, that he shall notify Plaintiff of such intention prior to the "shut-
20 off" of said utility thereby allowing Plaintiff the opportunity of establishing such utility
21 service in her own name.

22 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that while Defendant
23 shall have the limited right to occupy said property until November 30, 2005, nothing
24 hereinabove shall be construed to establish any type of tenancy relationship between
25 the parties herein, and should Defendant not vacate said property by 11:59 p.m. on
26 November 30, 2005, then Plaintiff shall have the right to "lock out" Defendant, without
27 any further order of court, and that the Constable shall act in accordance herewith.

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1 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that upon the
2 Defendant's vacation from the Riva Del Garda Place residence that he shall be entitled
3 to only take the personal property as listed in item 3, hereinbelow, and that all other
4 property (including, but not limited to all appliances, lighting fixtures, etc.) shall remain
5 with said property and shall be awarded to Plaintiff as her sole and separate property.

6 **2. COMMUNITY PROPERTY TO BE DISTRIBUTED TO PLAINTIFF:**

7 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Plaintiff is
8 awarded the following items of community property as her sole and separate property:

- 9 1. The marital residence located at 2029 Riva Del Garda Place, Las Vegas,
10 NV 89134, under the terms stated in item 1 hereinabove;
- 11 2. All assets, bank accounts, investments, equipment, accounts receivables,
12 goodwill, and all other items of value, of the business known as Little
13 Pastry Chefs, Inc.;
- 14 3. The 2002 Chevrolet Venture, subject to any encumbrances thereon;
- 15 4. All furnishings and property, currently in her possession, except for those
16 items specifically awarded to Defendant in item 3 hereinbelow.
- 17 5. All retirement accounts, pension plans, etc. in her name or being held for
18 her benefit;
- 19 6. All bank accounts, investments, and/or property in her name; and
- 20 7. All of her clothing, jewelry and personal items.

21 **3. COMMUNITY PROPERTY TO BE DISTRIBUTED TO DEFENDANT:**

22 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Defendant is
23 awarded the following items of community property as his sole and separate property:

- 24 1. The 2001 Nissan Xterra automobile, subject to any encumbrance thereon.
- 25 2. All of his clothing and personal items;
- 26 3. All retirement accounts, pension plans, etc., in his name, including, but not
27 limited to 100% of all retirement benefits that he may have through
28 employment with the Vons Companies.

- 1 4. All bank accounts, investments, and/or property in his name; and
- 2 5. The following items currently located in the Riva Del Garda Place
- 3 residence:
- 4 a. The green leather couch;
- 5 b. The green leather chair; and
- 6 c. Miscellaneous household items in the garage.

7 **4. COMMUNITY DEBTS TO BE AWARDED TO PLAINTIFF:**

8 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Plaintiff shall
9 be responsible for paying the following debts, and shall hold the Defendant harmless
10 therefrom:

- 11 1. The new encumbrance on the residence located at 2029 Riva Del Garda
- 12 Place, financed through First Horizon Home Loan Corporation, with an
- 13 approximate current balance of \$ 322,000.00;
- 14 2. Any remaining amounts owed to Homecoming Mortgage as a result of the
- 15 refinance of 2029 Riva Del Garda Place residence;
- 16 3. The encumbrance owed to GMAC on the 2002 Chevrolet Venture automobile;
- 17 4. The debt owed to American Express account number 3723-557xxx-xx000, in
- 18 Plaintiff's name, with an approximate outstanding balance of \$850.00;
- 19 5. The debts owed to various medical providers, in the approximate amount of
- 20 \$3,000.00;
- 21 6. Any and all credit cards and other debts in her own name; and
- 22 7. Any encumbrance on any property awarded to Plaintiff hereinabove.

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1 **5. COMMUNITY DEBTS TO BE AWARDED TO DEFENDANT:**

2 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Defendant
3 shall be responsible for paying the following debts, and shall hold the Plaintiff harmless
4 therefrom:

- 5 1. The encumbrance, if any, on the 2001 Nissan Xterra automobile;
- 6 2. The debt owed to Wells Fargo Financial Account number 538xxx30, in
7 Defendant's name, with an approximate outstanding balance of \$700.00;
- 8 3. Any and all credit cards and debts in his own name; and
- 9 4. Any encumbrance on any property awarded to Defendant hereinabove.

10 **COOPERATION AND EXECUTION OF DOCUMENTS**

11 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the parties shall
12 cooperate and execute any and all documentation to effectuate the division of assets
13 and debts as stated hereinabove and that the parties will use good faith in executing all
14 such documents.

15 **IT IS FURTHER ORDERED ADJUDGED AND DECREED**, that any and all
16 transfers of property, execution of documents evidencing any ownership of the parties
17 and/or of the community interest therein which have occurred within the last 6 months
18 prior to the filing of the decree are hereby ratified by this Decree of Divorce to have
19 occurred incident to this divorce.

20 **IT IS FURTHER ORDERED ADJUDGED AND DECREED**, that the parties
21 believe and agree that the transfers of property between them required by this Decree
22 of Divorce are tax free transfers of property between them incident to the Divorce and
23 are therefore tax-free transfers of property made pursuant to Section 1041 of the
24 Internal Revenue Code and are not taxable sales or exchanges of property or payments
25 for alimony, except where this agreement specifically denotes payments as such. Each
26 party covenants and agrees not to take any position inconsistent with this belief and
27 agreement, including, without limitation, any position with respect to the basis of any
28 asset on his or her tax returns after the date of this Agreement.

1 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that should either
2 party fail to cooperate in transferring title to property as ordered by this Decree of
3 Divorce, then said aggrieved party may seek the services of the Clerk of Court, in
4 accordance with Nevada Revised Statutes and/or Nevada Rules of Civil Procedure
5 including, but not limited to Rule 70 thereof, to sign all necessary documents to
6 accomplish said transfers of title, without further order of this court and as to any real or
7 personal property within the State of Nevada, this Decree of Divorce shall be
8 considered a judgment vesting title therein as stated hereinbelow and divesting the
9 other spouse of said title and this judgment shall have the effect of a conveyance
10 executed in due form of law.

11 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that where
12 this judgment is for delivery of possession, the party in whose favor said delivery is
13 entered is entitled to a writ of execution or assistance upon application to the clerk of
14 court.

15 **IT IS FURTHER ORDERED ADJUDGED AND DECREED**, that based upon the
16 agreement of the parties, that the division of property as stated hereinabove is fair and
17 equitable.

18 **RELEVANT STATUTORY PROVISIONS**

19 **IT IS FURTHER ORDERED** that pursuant to NRS 125B.055(3), the parties are
20 hereby notified that within ten (10) days after a Court of this State issues an Order for
21 the support of a child, each party to the cause of action shall file with the Court that
22 issued the Order and the welfare division the following:

- 23 (a) His or her social security number;
24 (b) His or her residential and mailing addresses;
25 (c) His or her telephone number;
26 (d) His or her driver's license number; and
27 (e) The name, address, and telephone number of his or her employer.

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1 **IT IS FURTHER ORDERED** that the parties shall submit the information required
2 in NRS 125B.055, NRS 125.130 and NRS 125.230 on a separate form to the Court and
3 the Welfare Division of the Department of Human Resources within ten days from the
4 date the Decree of Divorce is filed. Such information shall be maintained by the Clerk in
5 a confidential manner and not part of the public record. The parties shall update the
6 information filed with the Court and the Welfare Division of the Department of Human
7 Resources within ten days should any of that information become inaccurate.

8 **THE PARTIES ARE FURTHER NOTIFIED** that each party shall update the
9 information filed with the Court (Eighth Judicial District Court, Family Division,
10 located at 601 North Pecos, Las Vegas, Nevada, 89101); and (2) the Welfare
11 Division (located at 3120 East Desert Inn Road, Las Vegas, Nevada, 89121) within
12 ten (10) days after the information becomes inaccurate.

13 **IT IS FURTHER ORDERED** that pursuant to NRS §125B.145, the parties are
14 hereby notified that children support shall be reviewed at any time upon a showing of
15 changed circumstances, or every three (3) years, pursuant to the Nevada Revised
16 Statutes, whichever occurs first.

17 **IT IS FURTHER ORDERED** that the parties are hereby put on notice that,
18 pursuant to NRS 125.450, a parent responsible for paying child support is subject to
19 NRS 31A.020 to 32A.240, inclusive, and Section 2 and 3 of Chapter 31A of the Nevada
20 Revised Statutes, regarding the withholding of wages and commissions for the
21 delinquent payment of support. These statutes and provisions require that, if a parent
22 responsible for paying child support is delinquent in paying the support of a child that
23 such person has been ordered to pay, then that person's wages or commissions shall
24 be immediately subject to wage assignment, pursuant to the provisions of the cited
25 statutes.

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1 **IT IS FURTHER ORDERED** that pursuant to NRS 125.510 (6):

2 PENALTY FOR VIOLATION OF ORDER; THE ABDUCTION,
3 CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION OF THIS
4 ORDER IS PUNISHABLE AS A CATEGORY D FELONY AS PROVIDED
5 IN NRS 193.130. NRS 200.359 provides that every person having a
6 limited right of custody to a child or any parent having no right of custody
7 to the child who willfully detains, conceals or removes the child from a
8 parent, guardian or other person having lawful custody or a right of
9 visitation of the child in violation of an order of this court, or removes the
10 child from the jurisdiction of the court without the consent of either the
11 court or all persons who have the right to custody or visitation is subject to
12 being punished for a category D felony as provided in NRS 193.130.

13 **IT IS FURTHER ORDERED** that pursuant to NRS 125.510(6) and (7), the parties
14 are hereby notified that the terms of the Hague Convention of October 25, 1980,
15 adopted by the 14th Session of the Hague Conference on Private International law are
16 applicable to the parties as follows:

17 Section 8: If a parent of the child lives in a foreign country or has
18 significant commitments in a foreign country:

19 (a) The parties may agree, and the Court shall include in the Order for
20 custody of the child, that the United States is the country of habitual
21 residence of the child for the purposes of applying the terms of the Hague
22 Convention as set forth in Subsection 7.

23 (b) Upon motion of the parties, the Court may order the parent to post a
24 bond if the Court determines that the parent poses an imminent risk of
25 wrongfully removing or concealing the child outside the country of habitual
26 residence. The bond must be in an amount determined by the Court and
27 may be used only to pay for the cost of locating the child and returning him
28 to his habitual residence if the child is wrongfully removed from or
29 concealed outside the country of habitual residence. The fact that a
30 parent has significant commitments in a foreign country does not create a
31 presumption that the parent poses an imminent risk of wrongfully
32 removing or concealing the child.

33 **IT IS FURTHER ORDERED** that pursuant to NRS 125C.200:

34 If custody has been established and the custodial parent intends to move
35 his residence to a place outside of this state and to take the child with him,
36 as soon as possible and before the planned move, attempt to obtain the
37 written consent of the noncustodial parent to move the child from this
38 state. If the noncustodial parent refuses to give that consent, the custodial
39 parent shall, before he leaves this state with the child, petition the court for

1 permission to move the child. The failure of a parent to comply with the
2 provisions of this section may be considered as a factor if a change of
3 custody is requested by the noncustodial parent.

4 **IT IS FURTHER ORDERED** that under the terms of the Parental Kidnapping
5 Prevention Act, 28 U.S.C. §1738A, and the Uniform Child Custody Jurisdiction Act, NRS
6 125A.010 et seq., the Courts of Nevada have exclusive modification jurisdiction of the
7 custody, visitation and child support terms relating to the child at issue in the case so
8 long as either of the parties, or the child, continues to reside in this jurisdiction.

9 **INDEMNIFICATION**

10 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that each party shall
11 so conduct their affairs so as to not contract, charge or answer for a debt, for which the
12 other's property or estate shall be or may become liable or answerable, and further in
13 accordance with the distribution of debts as stated hereinabove, each party shall hold
14 the other harmless from said debt and shall indemnify the other therefrom.

15 **ENFORCEMENT OF THIS DECREE OF DIVORCE**

16 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that should either
17 party, not be in compliance with this Decree of Divorce and should the aggrieved party
18 bring the appropriate action before any court to enforce said Decree, then the non-
19 compliant party shall be responsible to the aggrieved party for all attorneys' fees, costs
20 and interest thereon, from the date of notice of non-compliance.

21 **CONTEMPT OF COURT**

22 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that should either
23 party, not be in compliance with this Decree of Divorce, such action shall be considered
24 a contempt of court, and the noncompliant party shall be subject to any sanction, or
25 order imposed by the court, including but not limited to imprisonment and/or fine.

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1 ATTORNEY'S FEES AND COSTS

2 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that each party shall
3 bear their own attorneys fees and costs in this matter through the filing of this Decree of
4 Divorce.

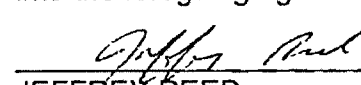
5 DATED and DONE this 4th day of August, 2005.

6
7
8 
9 DISTRICT COURT JUDGE
10 LISA M. BROWN
11

12 Agreed to this 26 Day of July,
13 2005 for the purposes and reasons as
14 stated hereinabove. Furthermore, I
15 hereby declare that I have
16 freely and voluntarily entered
17 into the foregoing agreement

18 
19 ALECIA ANN REED

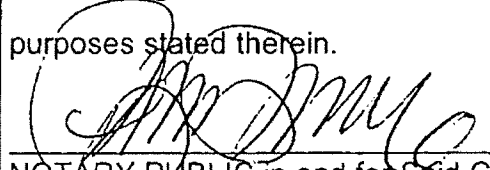
20 Agreed to this 27th Day of JULY,
21 2005 for the purposes and reasons as
22 stated hereinabove. Furthermore, I
23 hereby declare that I have
24 freely and voluntarily entered
25 into the foregoing agreement

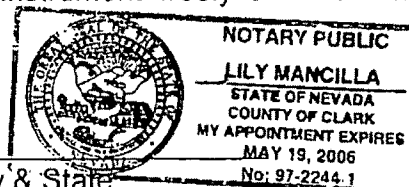
26 
27 JEFFREY REED
28 2029 RIVA DEL GARDIA PL. NV
Las Vegas NV, 89134
Defendant, in proper person

STATE OF NEVADA

COUNTY OF CLARK

20)
21) ss:
22 On this 26th day of July, 2005, before me, a
23 notary public, personally appeared ALECIA ANN REED, personally known or proven to
24 me to be the person whose name is subscribed to the above Decree of Divorce who
25 acknowledged that she executed this instrument freely and voluntarily and for the
26 purposes stated therein.

27 
28 NOTARY PUBLIC in and for Said County & State

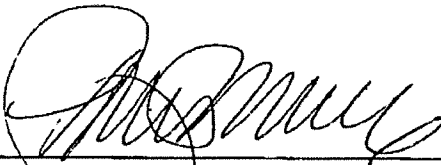


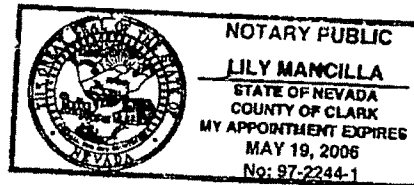
1 STATE OF NEVADA

2 COUNTY OF CLARK

)
) ss:
)

3 On this 57th day of July, 2005, before me, a
4 notary public, personally appeared JEFFREY REED, personally known or proven to me
5 to be the person whose name is subscribed to the above Decree of Divorce who
6 acknowledged that she executed this instrument freely and voluntarily and for the
7 purposes stated therein.

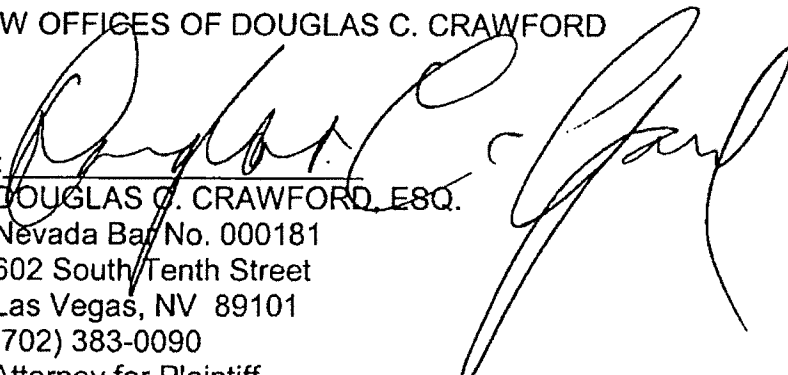
8 

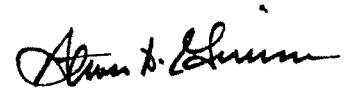


10
11 NOTARY PUBLIC in and for Said County & State

12 Respectfully Submitted by:

13 LAW OFFICES OF DOUGLAS C. CRAWFORD

14
15
16 By: 
17 DOUGLAS C. CRAWFORD, ESQ.
18 Nevada Bar No. 000181
19 602 South Tenth Street
20 Las Vegas, NV 89101
21 (702) 383-0090
22 Attorney for Plaintiff
23 ALECIA ANN REED
24
25
26
27
28


CLERK OF THE COURT

1 NOTC
2 ELIZABETH BRENNAN
3 Nevada Bar No. 7286
4 Brennan Law Firm
5 7455 Arroyo Crossing Parkway, Suite 220
6 Las Vegas, Nevada 89113
7 Phone: (702) 834-8888 Fax: (702) 507-1466
8 Elizabeth@BrennanLawFirm.com
9 Attorney for Plaintiff

DISTRICT COURT – FAMILY DIVISION
CLARK COUNTY, NEVADA

Alecia Ann Draper,

Plaintiff

vs.

Jeffery Allen Reed,

Defendant

Case No.: D-338668

Dept No.: S

**PLAINTIFF'S NOTICE OF WITHDRAWAL OF REQUEST TO CONTINUE CHILD
SUPPORT FOR EMILY AFTER HIGH SCHOOL GRADUATION
DUE TO CHILD'S DISABILITY
& REQUEST TO VACATE EVIDENTIARY HEARING**

NOTICE is hereby provided by Plaintiff, Alecia Ann Draper, that she hereby withdraws her request to have child support continue for the minor child, Emily Reed, after she graduates from high school due to her disability. Accordingly, Plaintiff hereby requests that the Court vacate the evidentiary hearing (which is solely on this issue) this is scheduled for May 11, 2015 at 9:30 a.m.

Respectfully Submitted:

BRENNAN LAW FIRM

/s/ Elizabeth Brennan

ELIZABETH BRENNAN, ESQ.
Attorney for Plaintiff

7455 Arroyo Crossing Parkway, Suite 220
Las Vegas, Nevada 89113
Phone: (702) 834-8888

Brennan Law Firm

7455 Arroyo Crossing Parkway, Suite 220
Las Vegas, Nevada 89113
Phone: (702) 834-8888

Brennan Law Firm

CERTIFICATE OF SERVICE

Pursuant to Nevada Rule of Civil of Procedure 5(b), I certify that on the 9th day of
March, 2015, I served the above and foregoing document entitled:

**PLAINTIFF'S NOTICE OF WITHDRAWAL OF REQUEST TO CONTINUE CHILD
SUPPORT FOR EMILY AFTER HIGH SCHOOL GRADUATION
DUE TO CHILD'S DISABILITY
& REQUEST TO VACATE EVIDENTIARY HEARING**

by the following method:

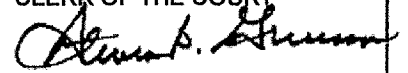
- ☒ Pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D) and Administrative
Order 14-2 captioned "In the Administrative Matter of Mandatory Electronic Service
in Eighth Judicial District Court," by mandatory electronic service through the Eighth
Judicial District Court's electronic filing system;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

To the parties listed at the address, email, and/or facsimile number below:

Frank J Toti
6900 Westcliff Drive #500
Las Vegas, NV 89145
frank@fitesq.com
Fax # (702) 364-1603

/s/ Elizabeth Brennan

An Employee of Brennan Law Firm



1 MOT
2 ELIZABETH BRENNAN
3 Nevada Bar No. 7286
4 Brennan Law Firm
5 7455 Arroyo Crossing Parkway, Suite 220
6 Las Vegas, Nevada 89113
7 Phone: (702) 834-8888 Fax: (702) 507-1466
8 Elizabeth@BrennanLawFirm.com
9 Attorney for Plaintiff

6 DISTRICT COURT – FAMILY DIVISION
7 CLARK COUNTY, NEVADA

8 Alecia Ann Draper, Individually and
9 as Conservator for Emily Reed

9 Plaintiff

10 vs.

11 Jeffery Allen Reed,

12 Defendant

Case No.: 05D338668

Dept No.: S

Date of Hearing: 03/04/2019

Time of Hearing: 10:00 AM

ORAL ARGUMENT REQUESTED

13 **PLAINTIFF'S MOTION (AS CONSERVATOR FOR EMILY REED)**
14 **FOR CHILD SUPPORT FOR A DISABLED CHILD BEYOND THE AGE OF MAJORITY**

15 NOW COMES, Plaintiff, Alecia Ann Draper, in her capacity AS CONSERVATOR FOR
16 EMILY REED ("Emily"), and hereby moves for an Order requiring both of Emily's parents, Alecia
17 Draper and Jeffery Reed, to pay child support for Emily due to her ongoing disability, for all the
18 reasons set forth herein, as well as the reasons set forth in the Countermotion for Child Support Et Al
19 filed in the captioned matter on July 21, 2017, which is incorporated herein by reference (which has
20 not yet been ruled on by the Court). Plaintiff attempted to resolve this matter prior to filing this
21 supplemental motion; however, it became clear that the parties were at a roadblock and additional
22 settlement discussions would not have been fruitful.

23 This motion is brought in good faith and is based on the attached Memorandum of Points and
24 Authorities, the pleadings on file herein, and such further evidence and oral argument of this matter at
25 the hearing.
26

Respectfully Submitted:

BRENNAN LAW FIRM

/s/ Elizabeth Brennan

ELIZABETH BRENNAN, ESQ.

Attorney for Plaintiff

NOTICE OF MOTION

PLEASE TAKE NOTICE that undersigned will bring the above and forgoing Motion on for hearing before this Court in Department S on the 04 day of March, 2019, at the hour of 10:00 a.m. of said day, or as soon thereafter as counsel may be heard.

BRENNAN LAW FIRM

/s/ Elizabeth Brennan

MEMORANDUM OF POINTS & AUTHORITIES

THE LAW

NRS 125B.110, Nevada's Handicapped Child Support Statute, provides the following:

1. A parent shall support beyond the age of majority his or her child with a handicap until the child is no longer handicapped or until the child becomes self-supporting. The handicap of the child must have occurred before the age of majority for this duty to apply.
2. For the purpose of this section, a child is self-supporting if the child receives public assistance beyond the age of majority and that assistance is sufficient to meet the child's needs.
3. This section does not impair or otherwise affect the eligibility of a person with a handicap to receive benefits from a source other than his or her parents.
4. As used in this section, "handicap" means an inability to engage in any substantial gainful activity by reason of a medically determinable physical or mental impairment which can be expected to result in death, or which has lasted or can be expected to last for a continuous period of not less than 12 months.
(Emphasis supplied).

In Nevada, the definition of "self-supporting" means the ability to work, or receive sufficient disability, in order to *financially* support oneself. *Edington vs. Edington*, 119 Nev. 577, 80 P.3d 1282, 1288 (Nev. 2003). In addition, the statute requires that the impairment itself (which must be capable

Respectfully Submitted:

BRENNAN LAW FIRM

/s/ Elizabeth Brennan

ELIZABETH BRENNAN, ESQ.

Attorney for Plaintiff

NOTICE OF MOTION

PLEASE TAKE NOTICE that undersigned will bring the above and forgoing Motion on for hearing before this Court in Department S on the ____ day of _____, 2019, at the hour of _____ .m. of said day, or as soon thereafter as counsel may be heard.

BRENNAN LAW FIRM

/s/ Elizabeth Brennan

MEMORANDUM OF POINTS & AUTHORITIES

THE LAW

NRS 125B.110, Nevada's Handicapped Child Support Statute, provides the following:

1. A parent shall support beyond the age of majority his or her child with a handicap until the child is no longer handicapped or until the child becomes self-supporting. The handicap of the child must have occurred before the age of majority for this duty to apply.
2. For the purpose of this section, a child is self-supporting if the child receives public assistance beyond the age of majority and that assistance is sufficient to meet the child's needs.
3. This section does not impair or otherwise affect the eligibility of a person with a handicap to receive benefits from a source other than his or her parents.
4. As used in this section, "handicap" means an inability to engage in any substantial gainful activity by reason of a medically determinable physical or mental impairment which can be expected to result in death, or which has lasted or can be expected to last for a continuous period of not less than 12 months.
(Emphasis supplied).

In Nevada, the definition of "self-supporting" means the ability to work, or receive sufficient disability, in order to *financially* support oneself. *Edington vs. Edington*, 119 Nev. 577, 80 P.3d 1282, 1288 (Nev. 2003). In addition, the statute requires that the impairment itself (which must be capable

1 of being medically established by accepted diagnostic techniques) be the cause of the fact that the
2 person is unable to support themselves. *Id at 1289.*

3 As shown herein, Emily meets all of the requirements necessary for this Court to order both
4 parents to pay child support pursuant to NRS 125B.110 as interpreted by the Nevada Supreme Court
5 in *Edington*.

6 **THE FACTS**

7 Plaintiff Alecia Draper ("Alecia"), is the conservator for the parties disabled daughter Emily
8 Reed ("Emily"). Attached hereto is the Sworn Declaration of Alecia, which provides the initial
9 testimony and documents in support of Plaintiff's request for child support for Emily. See Sworn
10 Declaration, Paragraphs 1 and 2.

11 Emily was born on November 16, 1996. Emily is currently 22 years old. Emily lives with
12 Alecia when she is not hospitalized. See Sworn Declaration, Paragraph 3. Emily is handicapped.
13 Emily suffers from major depressive disorder with psychotic features, post-traumatic stress disorder,
14 and severe stressors. Emily's handicap began BEFORE she reached the age of majority and has
15 continuously required treatment. *See all exhibits attached hereto.* See Sworn Declaration, Paragraph
16 4.

17 Emily's medical history is extensive, and her disability has been medically established. **Emily**
18 **has remained disabled since prior to her 18th birthday and is unable to engage in any substantial**
19 **gainful activity and is unable to be financially self-supporting.** *See Exhibit 1, Dr. Farrell Medical*
20 *Record & Expert Report; Exhibit 2, Summary of Emily's Medical History; Exhibit 3, Summary of*
21 *Emily's Income & Expenses for 2017 and 2018; Exhibit 4, Detailed List of Emily's Expenses for 2017*
22 *and 2018.* See Sworn Declaration, Paragraph 5. As a result of Emily's continuing disability, Alecia
23 filed a Petition for Appointment of Conservator over Emily in Superior Court of California, County
24 of Orange, Case Number: 30-2018-00970067-PR-LP-CJC (the "Conservatorship Case"). In October
25 of 2018, Alecia was appointed as Emily's conservator. See Sworn Declaration, Paragraph 6.

Due to Emily's qualifying disability and her inability to financially support herself, Alecia hereby requests that both parents be ordered to pay support for Emily, retroactive to the filing of Plaintiff's original request, and continuing for the duration of Emily's disability. See Sworn Declaration, Paragraph 7.

Emily was sexually abused by Allen Richard Gorry prior to her eighteenth birthday, from age 7 through age 17, during her visitation time periods with her Dad, Jeffrey Reed ("Dad" or "Defendant"). In January of 2018, Mr. Gorry pled guilty to a felony charge related to these horrendous sexual crimes against Emily and is now in jail serving time for these crimes. See Sworn Declaration, Paragraph 8.

Emily threatened suicide prior to her eighteenth (18th) birthday. See Sworn Declaration, Paragraph 9. In addition, Emily was hospitalized a total of 81 days during the time period of 3/18/14 - 4/16/15 before graduation from high school, as set forth below:

3/18/14 - 4/7/14	UCIMC Neuropsychiatric Center	19 days	<u>Exhibit 10</u>
4/7/14 - 5/12/14	Center for Discovery	35 Days	<u>Exhibit 11</u>
3/7/2015 - 3/30/2015	Del Amo Hospital	23 Days	<u>Exhibit 15</u>
4/16/15 - 4/20/15	UCIMC Neuropsychiatric Center	4 days	<u>Exhibit 16</u>

See Sworn Declaration, Paragraph 10.

From 2008 through 2014 (5th grade – 12th grade), Emily required special education services in the form of an Individualized Educational Program ("IEP"). See Exhibit 5, 2008 – 2011 IEP's Clark County School District. See also Exhibit 6, 2011 – 2014 IEP's Huntington Beach School District. See Sworn Declaration, Paragraph 11.

In September and October of 2013 (while Emily was 16 years old and in the 11th grade), Emily's school conducted two Multidisciplinary Psycho-Educational Assessments to determine if Emily continued to have a disability and a continued need for special education services. The answer was yes! The assessments concluded that Emily had a **Specific Learning Disability and was Hearing**

1 **Impaired.** See Exhibit 7, 09/09/13 – 09/16/13 Psycho-Educational Assessment Report. See also
2 Exhibit 8, 10/03/13 Psycho-Educational Assessment Report. See Sworn Declaration, Paragraph 12.

3 In March of 2014 (while Emily was 17 years old and in the 11th grade), Emily disclosed to her
4 school counselors she was thinking about killing herself. As a result, Emily was transported from
5 school to UCIMC Neuropsychiatric Center on March 18, 2014. See Exhibit 9, Suicide Assessment by
6 School Psychologist. See Sworn Declaration, Paragraph 13.

7 From March 18, 2014 – April 7, 2014 (while Emily was 17 years old and in the 11th grade),
8 Emily was hospitalized for three weeks at UCI psychiatric hospital as a result of being sexually
9 molested for years as a young girl, her suicide ideation, and her emotional issues. This was Emily's
10 first hospitalization as a minor. The medical records reveal auditory hallucinations and regressed, self-
11 injurious behavior. Emily disclosed sexual abuse by her father's roommate for years as a young girl
12 where she was forced to watch pornography and engage in oral sex. See Exhibit 10, UCIMC
13 Neuropsychiatric Center Medical Records. See Sworn Declaration, Paragraph 14.

14 From April 7 – May 12, 2014 (while Emily was 17 years old and in the 11th grade), Emily was
15 hospitalized for 35 days at Center for Discovery. This was Emily's second hospitalization as a minor.
16 See Exhibit 11, Center for Discovery Medical Records. See Sworn Declaration, Paragraph 15.

17 In September and October of 2014 (while Emily was 17 years old and in the 12th grade),
18 Emily's school conducted another Multidisciplinary Psycho-Educational Assessment, again to
19 determine if Emily continued to have a disability and a continued need for special education services.
20 The answer again was yes! Now, however, the diagnosis was changed to **Emotional Disturbance.**
21 See Exhibit 12, 09/16/14 – 10/22/14 Psycho-Educational Assessment Report. To this very day, Emily
22 continues to suffer from emotional disturbances diagnosed before her 18th birthday. See Sworn
23 Declaration, Paragraph 16.

24 On February 9, 2015 (while still in high school), Emily applied for Vocational Rehabilitation
25 Services due to her disability. See Exhibit 13, Vocational Rehabilitation File. See Sworn Declaration,
26 Paragraph 17.

1 On March 2, 2015 (while still in high school), Emily was approved by the Department of
2 Rehabilitation for Vocational Rehabilitation Services because she met the eligibility criteria, namely
3 she was found to have a “**physical or mental impairment which constitutes or results in a**
4 **substantial impediment to employment based on information from her doctor or another valid**
5 **source.**” She was given Priority for Services in Category 1, 2 and 3. Unfortunately, Emily was unable
6 to complete the interview process due to her emotional breakdowns, hospitalizations, and the
7 continued worsening of her mental state. As a result, it was determined that Emily was not a candidate
8 for vocational services and her case was closed on April 3, 2015. See Exhibit 13, Vocational
9 Rehabilitation File. See Sworn Declaration, Paragraph 18.

10 In March 2015 (while still in high school), Emily was admitted to Del Amo hospital for suicidal
11 ideation after she tried to strangle herself with the sleeves of a sweater. See Exhibit 15, Del Amo
12 Hospital Medical Records. See Sworn Declaration, Paragraph 19.

13 In April of 2015 (while still in high school), Emily was hospitalized again at UCIMC
14 Neuropsychiatric Center for four (4) days when, according to her school psychologist, she was
15 agitated, rolling around on the asphalt in the fetal position for thirty-five (35) minutes and screaming.
16 See Sworn Declaration, Paragraph 20.

17 In April of 2015 (while still in high school), Emily began treating with Elise Collier at Pure
18 Light Counseling for treatment of her complex PTSD, chronic, severe and severe Dissociative Identity
19 Disorder, NOS. See Exhibit 16, Pure Light Counseling. See Sworn Declaration, Paragraph 21.

20 In April of 2015 (while still in high school), Emily applied for and was awarded Social Security
21 Disability. See Exhibit 17, Social Security Approval Letter. See Sworn Declaration, Paragraph 22.

22 In July of 2015, it was recommended that Emily could benefit from a service dog. See Exhibit
23 18, Pure Light Counseling. See Sworn Declaration, Paragraph 23. Since 2015, Emily has been
24 receiving Social Security Disability Income. Attached as Exhibit 19 is a summary listing of all Social
25 Security Disability Income checks Emily has received to date. See Exhibit 19, Social Security
26 Disability Income Bank Ledger. Emily will continue to receive Social Security Disability Income in

1 2019. See Exhibit 20, Social Security Approval Letter. See Sworn Declaration, Paragraph 24.
2 Unfortunately, Emily cannot work due to her disability and her Social Security Disability Income is
3 NOT sufficient to meet her monthly financial expenses. See Exhibit 3, Summary of Emily's Income
4 and Expenses for 2017 and 2018. See Sworn Declaration, Paragraph 25.

5 Most recently in February of 2018, Emily was admitted to a twenty-one (21) day intense
6 therapy program at Collin A. Ross Institute in Texas. See Sworn Declaration, Paragraph 26.

7 Defendant received information about each of Emily's hospitalizations and has been very
8 much aware of Emily's diagnosis of severe PTSD, Major depressive disorder with Psychotic features,
9 stressor related disorder. See Sworn Declaration, Paragraph 27. Emily continues to suffer from severe
10 posttraumatic stress and depression from years of sexual abuse as a young child. She has seen many
11 different psychiatrists and psychologists but has not gotten better. See Sworn Declaration, Paragraph
12 28. Emily takes medication for her chronic PTSD, depression, and anxiety. See Sworn Declaration,
13 Paragraph 29. Emily is not able to maintain a job. See Sworn Declaration, Paragraph 30. Emily cannot
14 be left alone for long periods of time without supervision. In fact, Alecia went on FMLA to be home
15 with Emily. Alecia also quit her job to be home with Emily. If Alecia cannot be home, she makes
16 sure that either one or both of Emily's brothers are there, or her husband in home. Emily's grandma
17 also comes to visit once a month for a week to help care for Emily. See Sworn Declaration, Paragraph
18 31.

19 **CONCLUSION**

20 For the above reasons, Plaintiff respectfully requests that this Court GRANT her Motion and
21 order BOTH of Emily's parents to pay child support for Emily – a handicapped adult child under
22 Nevada law.

23 Respectfully Submitted:

24 BRENNAN LAW FIRM

25 /s/ Elizabeth Brennan
26 ELIZABETH BRENNAN, ESQ.
Attorney for Plaintiff

**DECLARATION OF ALECIA DRAPER AS CONSERVATOR FOR EMILY REED
IN SUPPORT OF MOTION FOR CHILD SUPPORT FOR CHILD WITH HANDICAP
BEYOND AGE OF MAJORITY**

I, ALECIA DRAPER, swear under penalty of perjury that the following statements are true and correct.

1. I am the Plaintiff, individually and as conservator for my disabled daughter Emily Reed ("Emily"), in the above-named action. I have personal knowledge of all matters stated herein, I am over the age of eighteen (18), and I would be competent to testify thereto if called to do so, except as to matters stated on information and belief, and as to those items, I believe them to be true.
2. I provide this Sworn Declaration in support of Plaintiff's Original and Supplemental Motion for Child Support For Disabled Child Beyond Age of Majority (collectively "Emily's Motion").
3. Emily was born on November 16, 1996. Emily is currently 22 years old. Emily lives with me when she is not hospitalized.
4. Emily is handicapped. Emily suffers from major depressive disorder with psychotic features, post-traumatic stress disorder, and severe stressors. Emily's handicap began BEFORE she reached the age of majority and has continuously required treatment. *See all exhibits attached hereto.*
5. Emily's medical history is extensive and her disability has been medically established. **Emily has remained disabled since prior to her 18th birthday and is unable to engage in any substantial gainful activity and is unable to be financially self-supporting.** *See Exhibit 1, Dr. Farrell Medical Record & Expert Report; Exhibit 2, Summary of Emily's Medical History; Exhibit 3, Summary of*

Emily's Income & Expenses for 2017 and 2018; Exhibit 4, Detailed List of Emily's Expenses for 2017 and 2018.

6. As a result of Emily's continuing disability, I filed a Petition for Appointment of Conservator over Emily in Superior Court of California, County of Orange, Case Number: 30-2018-00970067-PR-LP-CJC (the "Conservatorship Case"). In October of 2018, I was appointed as Emily's conservator.
7. Due to Emily's qualifying disability and her inability to financially support herself, I hereby request that both parents be ordered to pay support for Emily, retroactive to the filing of Plaintiff's original request, and continuing for the duration of Emily's disability.
8. **Emily was sexually abused by Allen Richard Gorry prior to her eighteenth birthday, from age 7 through age 17**, during her visitation time periods with her Dad, Jeffrey Reed ("Dad" or "Defendant"). In January of 2018, Mr. Gorry pled guilty to a felony charge related to these horrendous sexual crimes against Emily and is now in jail serving time for these crimes.
9. **Emily threatened suicide prior to her eighteenth (18th) birthday.**
10. **Emily was hospitalized a total of 81 days during the time period of 3/18/14 - 4/16/15 before graduation from high school**, as set forth below:

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5, 2008 – 2011 IEP's Clark County School District. See also *Exhibit 6, 2011 – 2014 IEP's Huntington Beach School District.*

12. In September and October of 2013 (while Emily was 16 years old and in the 11th grade), Emily's school conducted two Multidisciplinary Psycho-Educational Assessments to determine if Emily continued to have a disability and a continued need for special education services. The answer was yes! The assessments concluded that Emily had a **Specific Learning Disability and was Hearing Impaired**. *See Exhibit 7, 09/09/13 – 09/16/13 Psycho-Educational Assessment Report. See also Exhibit 8, 10/03/13 Psycho-Educational Assessment Report.*
13. In March of 2014 (while Emily was 17 years old and in the 11th grade), Emily disclosed to her school counselors she was thinking about killing herself. As a result, Emily was transported from school to UCIMC Neuropsychiatric Center on March 18, 2014. *See Exhibit 9, Suicide Assessment by School Psychologist.*
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15. From April 7 – May 12, 2014 (while Emily was 17 years old and in the 11th grade), Emily was hospitalized for 35 days at Center for Discovery. This was Emily's

second hospitalization as a minor. See Exhibit 11, Center for Discovery Medical Records.

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17. On February 9, 2015 (while still in high school), Emily applied for Vocational Rehabilitation Services due to her disability. See Exhibit 13, Vocational Rehabilitation File.
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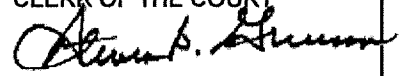
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20. In April of 2015 (while still in high school), Emily was hospitalized again at UCIMC Neuropsychiatric Center for four (4) days when, according to her school psychologist, she was agitated, rolling around on the asphalt in the fetal position for thirty-five (35) minutes and screaming.
21. In April of 2015 (while still in high school), Emily began treating with Elise Collier at Pure Light Counseling for treatment of her complex PTSD, chronic, severe and severe Dissociative Identity Disorder, NOS. *See Exhibit 16, Pure Light Counseling.*
22. In April of 2015 (while still in high school), Emily applied for and was awarded Social Security Disability. *See Exhibit 17, Social Security Approval Letter.*
23. In July of 2015, it was recommended that Emily could benefit from a service dog. *See Exhibit 18, Pure Light Counseling.*
24. Since 2015, Emily has been receiving Social Security Disability Income. Attached as *Exhibit 19* is a summary listing of all Social Security Disability Income checks Emily has received to date. *See Exhibit 19, Social Security Disability Income Bank Ledger.* Emily will continue to receive Social Security Disability Income in 2019. *See Exhibit 20, Social Security Approval Letter.*
25. Unfortunately, Emily cannot work due to her disability and her Social Security Disability Income is NOT sufficient to meet her monthly financial expenses. *See Exhibit 3, Summary of Emily's Income and Expenses for 2017 and 2018.*
26. Most recently in February of 2018, Emily was admitted to a twenty-one (21) day intense therapy program at Collin A. Ross Institute in Texas.

27. Defendant received information about each of Emily's hospitalizations and has been very much aware of Emily's diagnosis of severe PTSD, Major depressive disorder with Psychotic features, stressor related disorder.
28. Emily continues to suffer from severe posttraumatic stress and depression from years of sexual abuse as a young child. She has seen many different psychiatrists and psychologists but has not gotten better.
29. Emily takes medication for her chronic PTSD, depression, and anxiety.
30. Emily is not able to maintain a job.
31. Emily cannot be left alone for long periods of time without supervision. In fact, I went on FMLA to be home with Emily. I also quit my job to be home with Emily. If I cannot be home, I make sure that either one or both of Emily's brothers are there, or my husband in home. Emily's grandma also comes to visit once a month for a week to help care for Emily.

Pursuant to NRS 53.045, I declare under penalty of perjury that the foregoing is true and correct.

Signed on this 7th of January 2019.

/s/ Alecia Draper
ALECIA DRAPER



1 NOTC
2 ELIZABETH BRENNAN
3 Nevada Bar No. 7286
4 Brennan Law Firm
5 7455 Arroyo Crossing Parkway, Suite 220
6 Las Vegas, Nevada 89113
7 Phone: (702) 834-8888 Fax: (702) 507-1466
8 Elizabeth@BrennanLawFirm.com
9 Attorney for Plaintiff

DISTRICT COURT – FAMILY DIVISION
CLARK COUNTY, NEVADA

Alecia Ann Draper, individually and
as Conservator for Emily Reed

Case No.: 05D338668

Plaintiff

Dept No.: S

vs.

Jeffery Allen Reed,

Defendant

NOTICE OF JOINDER

Pursuant to this Court's *Decision and Order* filed on 5/22/2018 (page 14, lines 22 – 24, and page 15, lines 22 – 24), notice is hereby given by Alecia Draper that she shall be proceeding from this date forward as the Plaintiff individually AND as **Conservator for Emily Reed**.

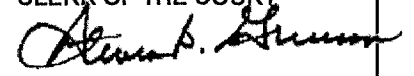
Respectfully Submitted:

BRENNAN LAW FIRM

/s/ Elizabeth Brennan

ELIZABETH BRENNAN, ESQ.

Attorney for Plaintiff



1 AMOT
ELIZABETH BRENNAN
2 Nevada Bar No. 7286
Brennan Law Firm
3 7455 Arroyo Crossing Parkway, Suite 220
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4 Phone: (702) 834-8888 Fax: (702) 507-1466
Elizabeth@BrennanLawFirm.com
5 Attorney for Plaintiff

6 DISTRICT COURT – FAMILY DIVISION
CLARK COUNTY, NEVADA

7 Alecia Ann Draper, Individually and
8 as Conservator for Emily Reed

9 Plaintiff

10 vs.

11 Jeffery Allen Reed,

12 Defendant

Case No.: 05D338668

Dept No.: H

Date of Hearing:

Time of Hearing:

ORAL ARGUMENT REQUESTED

13 **PLAINTIFF'S FIRST AMENDED MOTION (AS CONSERVATOR FOR EMILY REED)**
14 **FOR CHILD SUPPORT FOR A DISABLED CHILD BEYOND THE AGE OF MAJORITY**

15 NOW COMES, Plaintiff, Alecia Ann Draper, in her capacity AS CONSERVATOR FOR
16 EMILY REED ("Emily"), and hereby AMENDS the Motion for Child Support for A Disabled Child
Beyond the Age of Majority as follows:

17 Pursuant to this Court's May 22, 2018 Order (page 15, lines 19 – 20), Plaintiff amends her
18 prior Motion to clarify that she is seeking child support SOLELY from Emily Reed's ("Emily") father,
19 Jeffery Reed. Plaintiff withdraws any request for an order for support against Emily's mother.

20 Plaintiff does not feel that it is in Emily's. best interest to pursue a court order for child support against
21 Emily's mother, Alecia Draper, inasmuch as she has been voluntarily paying 100% support for Emily
22 and will continue to do so, if necessary, without a court order. Furthermore, Plaintiff believes this
23 change should resolve the "conflict of interest" alleged by Defendant, which Plaintiff does NOT
24 believe exists. Plaintiff believes it is in Emily's best interest to remain counsel in this case inasmuch
25
26

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Las Vegas, Nevada 89113
Phone: (702) 834-8888

Brennan Law Firm

1 as Ms. Brennan is familiar with all facts, the procedural history of this case, and the extensive medical
2 records of Emily.

3 The above is the only change to Plaintiff's Motion.

4 Respectfully Submitted:

5 BRENNAN LAW FIRM

6 /s/ Elizabeth Brennan
7 ELIZABETH BRENNAN, ESQ.
8 Attorney for Plaintiff
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CERTIFICATE OF SERVICE

Pursuant to Nevada Rule of Civil of Procedure 5(b), I certify that on the 10th day of April 2018, I served the above and foregoing document entitled:

PLAINTIFF'S FIRST AMENDED MOTION (AS CONSERVATOR FOR EMILY REED)
FOR CHILD SUPPORT FOR A DISABLED CHILD BEYOND THE AGE OF MAJORITY

by the following method:

- ☒ Pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D) and Administrative Order 14-2 captioned "In the Administrative Matter of Mandatory Electronic Service in Eighth Judicial District Court," by mandatory electronic service through the Eighth Judicial District Court's electronic filing system;

To the parties listed at the address, email, and/or facsimile number below:

Amanda Roberts
Attorney for Defendant

/s/ Elizabeth Brennan
An Employee of Brennan Law Firm

MOFI
ELIZABETH BRENNAN
Nevada Bar No. 7286
Brennan Law Firm
7455 Arroyo Crossing Parkway, Suite 220
Las Vegas, Nevada 89113
Phone: (702) 834-8888 Fax: (702) 507-1466
Elizabeth@BrennanLawFirm.com
Attorney for Plaintiff

DISTRICT COURT – FAMILY DIVISION
CLARK COUNTY, NEVADA

Alecia Ann Draper, individual and
As Conservator for Emily Reed

Plaintiff

vs.

Jeffery Allen Reed,

Defendant

Case No.: 05D338668

Dept No.: H

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

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

Plaintiff's First Amended Motion (As Conservator for Emily Reed) For Child Support For a Disabled Child Beyond the Age of Majority

Pursuant to NRS 125, 125B & 125C, Motions/ Oppositions to Motions filed after entry of final Decree or Judgment are subject to the Re-Open Filing Fee of \$25.00 unless specifically excluded.

Excluded Motions/Oppositions that are NOT subject to filing fee:

☐ Motions filed before final Divorce/Custody Decree is entered.

☒ Motions filed solely to adjust child support amount. No other request is made.

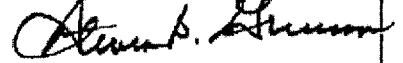
☐ Motion is made for reconsideration or a new trial and is filed within 10 days of the Judge's Order

This Motion/Opposition

Is NOT subject to \$25.00 filing fee.

BRENNAN LAW FIRM

/s/ Elizabeth Brennan



1 ORDER
2 ELIZABETH BRENNAN
3 Nevada Bar No. 7286
4 Brennan Law Firm
5 7455 Arroyo Crossing Parkway, Suite 220
6 Las Vegas, Nevada 89113
7 Phone: (702) 834-8888 Fax: (702) 507-1466
8 Elizabeth@BrennanLawFirm.com
9 Attorney for Plaintiff, Alecia Draper
10 Solely as Conservator for Emily Reed

DISTRICT COURT – FAMILY DIVISION
CLARK COUNTY, NEVADA

Alecia Ann Draper,

Plaintiff

vs.

Jeffery Allen Reed,

Defendant

Case No.: 05D338668

Dept No.: H

ORDER

THIS MATTER having come on for hearing on April 9, 2019 on Plaintiff's *First Amended Motion (As Conservator for Emily Reed) For Child Support For A Disabled Child Beyond The Age of Majority ("Motion")*. Plaintiff, Alecia Draper, appeared individually and as Conservator for Emily Reed, by telecommunications equipment. Plaintiffs' counsel Elizabeth Brennan, Esq. of Brennan Law Firm appeared in person in Court. Defendant, Jeffery Reed, was also present and represented by counsel, Amanda Roberts.

The Court having reviewed the papers and pleadings on file herein, having heard arguments of counsel, and having been fully apprised of the facts and matters herein, the Court makes the following findings and orders:

- 1) The *Decision and Order* entered by Judge Ochoa filed in the captioned matter on May 22, 2018 granted Emily Reed the right to seek support from either or both of her parents based

1 on her ability, or inability, to support herself pursuant to NRS 125B.110. See *Decision and*
2 *Order*, page 15, lines 19 – 21.

3 2) In the *Decision and Order*, Judge Ochoa held that Emily Reed has a statutory cause of
4 action against her parents and must be joined as a party or as a party through her guardian
5 or guardian ad litem for this case to proceed. See *Decision and Order*, page 23, lines 22 –
6 24.

7 3) In the *Decision and Order*, Judge Ochoa further stated that Emily Reed could file a separate
8 action or “the parties may join the guardian for Emily as a party [to this action] without
9 requiring a separate action by Emily. To hold otherwise would cause a court with general
10 jurisdiction authority to consider multiple cases where one would suffice. In the interest
11 of judicial economy, Emily should be joined as a party.” See *Decision and Order*, page
12 14, line 18 - 22.

13 4) On January 22, 2019, a *Notice of Joinder* and *Motion* were filed in the captioned matter
14 by Emily Reed, through her Conservator Alecia Draper. The Court hereby finds that these
15 filings constitute Emily Reed’s request for permissive joinder into this Case, which is
16 hereby granted.

17 5) The Court finds adequate cause for the parties to develop their claims and defenses to
18 Emily Reed’s request for child support pursuant to NRS 125B.110 so discovery is open.

19 IT IS HEREBY ORDERED, ADJUGED AND DECREED that EMILY REED, through her
20 Conservator Alecia Draper, is hereby JOINED as a party to this action

21 IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED that DISCOVERY
22 IS OPEN.

23 ...

24 ...

25 ...

7455 Arroyo Crossing Parkway, Suite 220
Las Vegas, Nevada 89113
Phone: (702) 834-8888

Brennan Law Firm

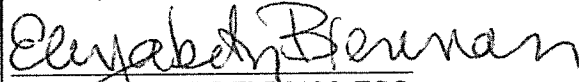
1 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that a Case
2 Management Conference is set for **July 24, 2019 at 9:00 a.m.** On this date and time, the Court will
3 set an Evidentiary Hearing for any unresolved issues.

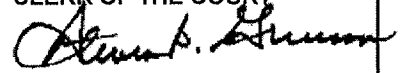
4 DATED this 22 day of April 2019.

5
6 
7 DISTRICT JUDGE 
8 T. ART RITCHIE, JR.

9
10
11 Respectfully Submitted:

12 BRENNAN LAW FIRM

13 
14 ELIZABETH BRENNAN, ESQ.



1 **NEO**
2 Elizabeth Brennan
3 Nevada Bar No. 7286
4 **BRENNAN LAW FIRM**
5 1980 Festival Plaza Drive, Suite 300
6 Las Vegas, NV 89135
7 Telephone: (702) 834-8888
8 Facsimile: (702) 507-1466
9 elizabeth@brennanlawfirm.com

6 *Attorney for Plaintiff Emily Reed,*
7 *through her Conservator Alecia Draper*

8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 Alecia Ann Draper,

11 Plaintiff,

12 v.

13 Jeffery Allen Reed,

14 Defendant.

Case No.: 05D338668

Dept. No.: H

15 **NOTICE OF ENTRY OF ORDER**

16 PLEASE TAKE NOTICE that the *Order from the April 9, 2019 Hearing* in the referenced
17 case was duly entered on April 30, 2019, by filing with the Clerk, and the attached is a true and
18 correct copy thereof.
19

20 BRENNAN LAW FIRM

21
22 By: /s/ Elizabeth Brennan
23 ELIZABETH BRENNAN

24 *Attorney for Plaintiff Emily Reed,*
25 *through her Conservator Alecia Draper*
26
27
28

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of Brennan Law Firm and that on this April 30, 2019,
3 service of the foregoing **NOTICE OF ENTRY OF ORDER** was made by mandatory electronic
4 service through the Eighth Judicial District Court's electronic filing system and/or by depositing a
5 true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following
6 at their last known address:

7
8 Amanda M. Roberts, Esq.
Attorney for Jeffery Allen Reed

9
10 Benjamin La Luzerne, Esq.
Attorney for Alecia Reed, Individually

11
12 /s/ Elizabeth Brennan
13 An Employee of BRENNAN LAW FIRM
14
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7455 Arroyo Crossing Parkway, Suite 220
Las Vegas, Nevada 89113
Phone: (702) 834-8888

Brennan Law Firm

1 ORDR
2 ELIZABETH BRENNAN
3 Nevada Bar No. 7286
4 Brennan Law Firm
5 7455 Arroyo Crossing Parkway, Suite 220
6 Las Vegas, Nevada 89113
7 Phone: (702) 834-8888 Fax: (702) 507-1466
8 Elizabeth@BrennanLawFirm.com
9 Attorney for Plaintiff, Alecia Draper
10 Solely as Conservator for Emily Reed
11

Electronically Filed
4/30/2019 6:29 PM
Steven D. Grierson
CLERK OF THE COURT



DISTRICT COURT – FAMILY DIVISION
CLARK COUNTY, NEVADA

Alecia Ann Draper,

Plaintiff

vs.

Jeffery Allen Reed,

Defendant

Case No.: 05D338668

Dept No.: H

ORDER

THIS MATTER having come on for hearing on April 9, 2019 on Plaintiff's *First Amended Motion (As Conservator for Emily Reed) For Child Support For A Disabled Child Beyond The Age of Majority ("Motion")*. Plaintiff, Alecia Draper, appeared individually and as Conservator for Emily Reed, by telecommunications equipment. Plaintiffs' counsel Elizabeth Brennan, Esq. of Brennan Law Firm appeared in person in Court. Defendant, Jeffery Reed, was also present and represented by counsel, Amanda Roberts.

The Court having reviewed the papers and pleadings on file herein, having heard arguments of counsel, and having been fully apprised of the facts and matters herein, the Court makes the following findings and orders:

- 1) The *Decision and Order* entered by Judge Ochoa filed in the captioned matter on May 22, 2018 granted Emily Reed the right to seek support from either or both of her parents based

1 on her ability, or inability, to support herself pursuant to NRS 125B.110. See *Decision and*
2 *Order*, page 15, lines 19 – 21.

3 2) In the *Decision and Order*, Judge Ochoa held that Emily Reed has a statutory cause of
4 action against her parents and must be joined as a party or as a party through her guardian
5 or guardian ad litem for this case to proceed. See *Decision and Order*, page 23, lines 22 –
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7 3) In the *Decision and Order*, Judge Ochoa further stated that Emily Reed could file a separate
8 action or “the parties may join the guardian for Emily as a party [to this action] without
9 requiring a separate action by Emily. To hold otherwise would cause a court with general
10 jurisdiction authority to consider multiple cases where one would suffice. In the interest
11 of judicial economy, Emily should be joined as a party.” See *Decision and Order*, page
12 14, line 18 - 22.

13 4) On January 22, 2019, a *Notice of Joinder and Motion* were filed in the captioned matter
14 by Emily Reed, through her Conservator Alecia Draper. The Court hereby finds that these
15 filings constitute Emily Reed’s request for permissive joinder into this Case, which is
16 hereby granted.

17 5) The Court finds adequate cause for the parties to develop their claims and defenses to
18 Emily Reed’s request for child support pursuant to NRS 125B.110 so discovery is open.

19 IT IS HEREBY ORDERED, ADJUGED AND DECREED that EMILY REED, through her
20 Conservator Alecia Draper, is hereby JOINED as a party to this action

21 IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED that DISCOVERY
22 IS OPEN.

23 ...

24 ...

25 ...



26

7455 Arroyo Crossing Parkway, Suite 220
Las Vegas, Nevada 89113
Phone: (702) 834-8888

Brennan Law Firm

1 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that a Case
2 Management Conference is set for **July 24, 2019 at 9:00 a.m.** On this date and time, the Court will
3 set an Evidentiary Hearing for any unresolved issues.

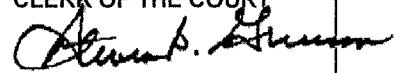
4 DATED this 22 day of April 2019.

5
6 
7 DISTRICT JUDGE 
8 T. ART RITCHIE, JR.

9
10
11 Respectfully Submitted:

12 BRENNAN LAW FIRM

13 
14 ELIZABETH BRENNAN, ESQ.



1 **OPPS**

2 Amanda M. Roberts, Esq.

3 State of Nevada Bar No. 9294

4 **ROBERTS STOFFEL FAMILY LAW GROUP**

5 4411 South Pecos Road

6 Las Vegas, Nevada 89121

7 PH: (702) 474-7007

8 FAX: (702) 474-7477

9 EMAIL: efile@lvfamilylaw.com

10 Attorneys for Defendant, Jeffrey Allen Reed

11 **DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 ALECIA ANN DRAPER,

14 Plaintiff,

15 v.

16 JEFFREY ALLEN REED,

17 Defendant.

} Case No: 05D338668

} Dept No: H

} **OPPOSITION OR STATEMENT
OF POSITION FOR DEFENDANT
ON THE REQUEST FOR CHILD
SUPPORT FOR AN ADULT-
EMILY REED**

18 COMES NOW the Defendant, Jeffrey Reed, by and through his attorney of
19 record, Amanda M. Roberts, Esq., and hereby provides his position regarding the
20 request for child support for the Parties' adult child, Emily Reed. The Defendant,
21 Jeffrey Reed, reserves the right to make additional claims if more information
22 becomes available.
23

24 1. There is a pending claim that Emily Reed (DOB: 11/16/1996) was
25 handicapped before she reached the age of majority pursuant to *NRS* § 125.110 (1)
26
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1 and 125.110 (4). The Defendant disputes this allegation. The Defendant does not
2 believe that Emily Reed was handicapped before she reached the age of majority or
3 that she had “an inability to engage in any substantial gainful activity by reason of
4 any medically determinable physical or mental impairment which can be expected
5 to result in death or which has lasted or can be expected to last for a continuous
6 period of not less than 12 months.”
7
8

9 2. There is a claim by the Defendant that the request being made is barred
10 from bring the claim. Specifically, on December 9, 2014, Alecia filed a Motion
11 with the Court wherein, among other things, she requested to reset child support
12 based upon a change in the custodial arrangement. At that time, Emily had reached
13 the age of eighteen (18), but was still in high school. Alecia’s Motion did not
14 include a request for child support for Emily upon graduation from high school, but
15 at the hearing on January 12, 2015, her Counsel argued for same and the matter was
16 set for an Evidentiary Hearing. The Defendant alleges the Evidentiary Hearing was
17 set to determine if Emily was disabled prior to reaching the age of eighteen (18).
18
19

20 On March 9, 2015, Alecia filed a “Notice of Withdrawal of Request to
21 Continue Child Support for Emily After High School Graduation Due to Child’s
22 Disability & Request to Vacate Evidentiary Hearing.” It is worth noting that this
23 was voluntarily filed, not a stipulated agreement. As a result of this document
24 being filed, the Evidentiary Hearing was vacated. **This was done based upon a**
25
26
27
28

1 filing of Alicia; Jeffrey had no say whether or not the Evidentiary Hearing was
2 vacated. {EMPHASIS ADDED}

3
4 3. There is a pending claim regarding Emily Reed's monthly need. The
5 Defendant disputes the alleged need each month based upon the information
6 provided herein.

7
8 4. The Defendant believes that the public assistance being received by
9 Emily is sufficient to meet her needs pursuant to *NRS* § 125B.110 (2).

10 * * *

11 The Defendant reserves the right to supplement his position as more
12 information becomes available.

13
14 DATED this 8th day of November, 2019.

15 **ROBERTS STOFFEL FAMILY LAW GROUP**

16
17 By: Amanda M. Roberts
18 Amanda M. Roberts, Esq.
19 State of Nevada Bar No. 9294
20 4411 South Pecos Road
21 Las Vegas, Nevada 89121
22 PH: (702) 474-7007
23 FAX: (702) 474-7477
24 EMAIL: efile@lvfamilylaw.com
25 Attorneys for Defendant, Jeffrey Allen Reed

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, and on the 8th day of November, 2019, I served by and through Wiz-Net electronic service, pursuant Clark County District Court Administrative Order 14-2 for service of documents identified in Rule 9 of the N.E.F.C.R., the foregoing **OPPOSITION OR STATEMENT OF POSITION FOR DEFENDANT ON THE REQUEST FOR CHILD SUPPORT FOR AN ADULT- EMILY REED,** as follows:

Elizabeth Brennan Esq.
Email: Elizabeth@brennanlawfirm.com
Attorney for Plaintiff, Alecia Draper,
In her Capacity as Conservator for Emily Reed

Benjamin La Luzerne, Esq
Email: Ben.laluzerne@laluzernelaw.com
Attorney for Plaintiff, Alecia Ann Draper, Individually

By: Shayna Hall
Employee of Roberts Stoffel Family Law Group

1 ORDR
2
3
4

5 **DISTRICT COURT**
6 **FAMILY DIVISION**
7 **CLARK COUNTY, NEVADA**

8 ALECIA A. REED, nka

9 Alecia Ann Draper,

10 Plaintiff,

11 vs.
12

13 JEFFREY A. REED,

14 Defendant.
15

CASE NO. 05D338668

DEPT. NO. H
16

17 **FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER**
18

19 This matter came on for evidentiary hearing before Art Ritchie, District
20 Court Judge, Family Division, Department H, on August 6, 2020, August 7, 2020,
21 November 19, 2020, and January 12, 2021. Alecia Draper and Emily Reed were
22 represented by Elizabeth R. Brennan, Esq. Jeffrey Reed was represented by
23 Amanda M. Roberts, Esq. The court reviewed the papers and pleadings on file,
24 the evidence admitted at the hearing, and for good cause, makes the following
25 findings of fact, conclusions of law, decision and order.
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1 on August 2, 2011. The court granted the motion to move, modified the visitation
2 order, and modified Jeffrey Reed's child support to \$725.00 per month.
3

4 Alecia Draper reopened the case on December 9, 2014, with the filing of
5 her motion to modify legal and physical custody. Jeffrey Reed's opposition and
6 countermotion was filed on January 2, 2015. The court set an evidentiary
7 hearing. At the evidentiary hearing the parties made a partial agreement. The
8 parties' Stipulation and Order from the January 12, 2015 hearing, was filed on
9
10 March 18, 2015. It contains the parties' agreement that the court will set an
11 evidentiary hearing to resolve Alecia Draper's request that child support continue
12 for Emily Reed after she graduates from high school due to a disability. The
13 parties agreed to continue the joint legal custody order, and modified Jeffrey
14 Reed's visitation. The parties agreed that Alecia Draper would provide insurance
15 for the children, and that Jeffrey Reed would pay \$66.00 per month beginning
16 January 1, 2015, towards the insurance cost. The parties agreed that Jeffrey
17 Reed's child support shall be based on an average income of \$60,000.00 per year.
18
19 Jeffrey Reed's child support was set at \$1,450.00 per month beginning January 1,
20 2015, with \$725.00 due on the fifth (5th) and \$725.00 due on the twentieth (20th)
21 day of each month.
22
23
24

25 On January 14, 2015, the court filed an Order setting the evidentiary
26 hearing to resolve Alecia Draper's request that child support continue for Emily
27

1 Reed after she graduates from high school due to a disability for May 11, 2015.
2 On March 9, 2015, Alecia Draper, through counsel, filed Plaintiff's Notice of
3 Withdrawal of request to Continue Child Support for Emily after High School
4 Graduation Due to Child Disability & Request to Vacate Evidentiary Hearing.
5 The court vacated the evidentiary hearing, and Department S statistically closed
6 the case on June 29, 2015, citing the parties' Stipulation and Order filed on March
7 18, 2015.
8
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10
11 Jeffrey Reed reopened the case on June 29, 2017, with the filing of his
12 motion to modify child support based upon emancipation of a child. Alecia
13 Draper filed her opposition and countermotion for child support for Emily
14 pursuant to NRS 125B.110 on July 21, 2017. The matter was heard on August
15 28, 2017. At the hearing, the parties agreed that two of the three children had
16 emancipated. The parties agreed that Jeffrey Reed would pay the presumed
17 maximum for one child, \$837.00 per month, plus \$66.00 per month towards
18 insurance for the remaining minor child. The court continued the matter to
19 November 8, 2017, to address the claim for post-majority support for Emily. The
20 order from the hearing was filed on December 15, 2017.
21
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24
25 The court heard the matter on November 8, 2017. The court requested
26 briefings in anticipation of an evidentiary hearing. On January 2, 2018, Jeffrey
27
28

1 Reed filed a motion for summary judgment. Alecia Draper's opposition was filed
2 on February 8, 2018. The matter was heard on April 9, 2018. The court took the
3 matter under advisement for decision. Judge Ochoa denied the motion for
4 summary judgment in his Decision and Order filed on May 22, 2018. The court
5 found, in part, that even though Alecia Draper's request to continue child support
6 for Emily was withdrawn on March 9, 2015, Jeffrey Reed continued to pay child
7 support for Emily for the next two years until he filed for child support
8 modification on June 29, 2017. The court found that Emily was receiving Social
9 Security Disability payments, and that there was a factual dispute about whether
10 Emily was disabled prior to age 18, and not able to engage in any substantial
11 gainful activity by reason of her significant and chronic mental impairment. The
12 court concluded that Emily had the right to bring her own action for support from
13 her parents. The court concluded that while a separate action for support was
14 available to Emily because she was an adult, this claim for post-majority child
15 support against the parents could be brought in the parties' divorce case.
16
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21 On July 23, 2018, the case was administratively reassigned to Department
22 H. Alecia Draper became Emily Reed's legal guardian in California in October,
23 2018. On January 22, 2019, Alecia Draper filed a Notice of Joinder in her
24 individual capacity and as Conservator for Emily Reed. On January 22, 2019,
25 Alecia Draper, as Conservator for Emily Reed, filed a motion for child support
26
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1 pursuant to NRS 125B.110. The motion was set for hearing on March 4, 2019.
2 Prior to the hearing, the parties submitted a stipulation and order to continue the
3 hearing. On April 9, 2019, Jeffrey Reed filed a motion to disqualify counsel from
4 bringing the child support claim on behalf of Emily Reed. On April 10, 2019,
5 Alecia Draper, as Conservator for Emily Reed, filed an amended motion for child
6 support pursuant to NRS 125B.110, clarifying that Ms. Draper is seeking child
7 support for Emily solely from Jeffrey Reed. The matter was heard on April 10,
8 2019. The court granted the motion to join Emily Reed as a party in interest. The
9 court set a discovery schedule, and set a case management conference for July 24,
10 2019.
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15 The matter was heard on July 24, 2019. The court received a report from
16 counsel concerning the status of discovery, and continued the case management
17 conference to October 23, 2019. On that date, the court received a report from
18 counsel concerning the status of discovery, and continued the case management
19 conference to January 8, 2020. The matter was heard on January 8, 2020, and
20 this case was set for evidentiary hearing on April 16, 2020, and April 17, 2020.
21
22

23 After the entry of Administrative Orders, AO 20-09 and AO 20-11 in
24 response to the COVID-19 pandemic, the court scheduled a telephone conference
25 with counsel. On March 31, 2020, the court spoke with counsel, and found good
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1 cause to continue the evidentiary hearing. The matter was rescheduled for June
2 18, 2020, and June 19, 2020. The court filed a Second Amended Order Setting
3 Evidentiary Hearing on May 12, 2020, resetting the evidentiary hearing for
4 August 6, 2020, and August 7, 2020.
5

6
7 The evidentiary hearing was held over four days between August 6, 2020,
8 and January 12, 2021. Alecia Draper, Jennifer Love Farrell, Emily Reed, and
9 Jeffrey Reed testified. The court received closing briefs, and the matter was
10 submitted for this decision and order. The court concludes that the witness
11 testimony and the documentary proof admitted at the hearing were sufficient for
12 the court to decide the child support matter.
13
14

15 **FINDINGS AND CONCLUSIONS**

16

17 This court has subject matter jurisdiction and personal jurisdiction over the
18 parties to this case.
19

20 **A. POST- MAJORITY CHILD SUPPORT**

21

22 **NRS 125B.110 Support of child with handicap beyond age of majority.**

23 1. A parent shall support beyond the age of majority his or her child with a
24 handicap until the child is no longer handicapped or until the child becomes self-
25 supporting. The handicap of the child must have occurred before the age of
26 majority for this duty to apply.
27
28

2. For the purposes of this section, a child is self-supporting if the child receives public assistance beyond the age of majority and that assistance is sufficient to meet the child's needs.

3. This section does not impair or otherwise affect the eligibility of a person with a handicap to receive benefits from a source other than his or her parents.

4. As used in this section, “handicap” means an inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months.
(Added to NRS by 1987, 2268; A 1991, 1336)

The court concludes that the duty to support Emily Reed applies to both parents based on its finding that Emily Reed was handicapped prior to her reaching the age of majority. The court finds that Emily Reed suffered significant mental and physical trauma prior to reaching the age of majority, and that Alecia Draper proved that Emily suffers from severe mental illness. Emily was sexually abused for more than eight years during her minority. The molestation was not discovered until 2014. Emily attempted suicide more than once before she graduated from high school. Records admitted at trial show that Emily suffered panic attacks, and injured herself while in high school. Emily applied for SSI in March, 2014, and she was granted Social Security Disability benefits in October, 2015. Jeffrey Reed advanced a defense that Emily was not disabled before she reached the age of majority, and that Emily is not currently disabled. The court heard evidence that Emily graduated from high school with a 3.78 GPA, obtained a California driver's license, and has some independence in Alecia Draper's

1 home. The court weighed the evidence as the trier of fact and concludes that
2 Emily is handicapped and that her mental health issues began prior to the age of
3 majority. Emily has been diagnosed with Post Traumatic Stress Disorder (PTSD),
4 Dissociative Identity Disorder, Major Depressive Disorder, and Dependent
5 Personality Disorder. Exhibit 5 shows that Emily was diagnosed with PTSD,
6 Major Depressive Disorder, and Anxiety Disorder before she turned age eighteen.
7
8

9 Emily is being treated by Dr. Jennifer Love Farrell (Dr. Love). Alecia
10 Draper selected Dr. Love to manage Emily's medication. Dr. Love testified on
11 August 6, 2020, that she has seen Emily approximately 46 times since 2016.
12 Exhibit 14 and Dr. Love's testimony support the finding that Emily continues to
13 suffer from chronic PTSD, Major Depressive Disorder, and Dissociative Identity
14 Disorder, and Dr. Love describes Emily as one of her most severely ill patients.
15 Emily was hospitalized most recently from December 31, 2019, through January
16 27, 2020.
17
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20 Dr. Love testified that Emily has many "alters" and that Emily will switch
21 personalities frequently. Dr. Love testified that Emily suffers auditory
22 hallucinations, and engages in strange public behavior. The court had the
23 opportunity to see Emily testify on August 6, 2020. Emily answered questions
24 from counsel, and testified through several "alters". The court heard from Heidi,
25
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1 age 7; Lilly, age 16; Holly, age 2; Dorothy, age 9; and Rose. Emily did not
2 engage as Emily during the testimony. This part of the case was unsettling.
3
4 Counsel for Alecia Draper spoke with Emily the day before the testimony, and
5 coordinated how she would examine Emily and the “alters”. This made Emily’s
6 testimony look contrived. The court carefully considered all of the evidence and
7
8 concludes that Emily’s testimony was not contrived, and was consistent with the
9 observations of Emily’s treating doctors, and the documentary proof.

10
11 The court concludes that Emily Reed is not self-supporting, and that her
12 Social Security Disability benefits are insufficient to meet her needs. A
13 Conservatorship or Guardianship to manage Emily Reed’s person and estate was
14 granted in October, 2018, by a California court. Alecia Draper filed a Financial
15 Disclosure Form for Emily on August 4, 2020. Emily Reed receives monthly
16 income of \$686.24 SSI, plus \$194.00 from Cal Fresh. Emily’s expenses are
17
18 \$48.00 for a cellular phone, \$228.00 for food, \$376.75 for insurance, and \$600.00
19 for rent paid to Alecia Draper. Additional expenses include ongoing professional
20 fees for Dr. Love’s treatment that are not covered by insurance.
21
22

23 The court concludes that Emily Reed is unable to engage in any
24 substantially gainful activity by reason of a medically determinable physical or
25 mental impairment which has lasted for a continuous period of not less than
26
27

1 twelve months. "Substantial gainful activity" means economic activity that
2 results in the child being financially self-supporting. *Edgington v. Edgington*, 119
3 Nev. 577, 585, 80 P.3d 1282, 1288 (2003). The Nevada handicapped child
4 support statute is designed to ensure that handicapped children have adequate
5 ongoing financial support from their parents, if needed. *Edgington v. Edgington*,
6 119 Nev. 577, 585, 80 P.3d 1282, 1288 (2003).
7
8

9 NRS 125B.110 was intended to require parents to bear some of the
10 financial burden for the support of their disabled child. As a general rule, court
11 ordered support obligations cease "[w]hen the child reaches 18 years of age if he
12 is no longer enrolled in high school, otherwise, when he reaches 19 years of age."
13 The law presumes that once a child reaches the age of majority, the child is
14 capable of self-support. Nevada's Legislature has created a statutory exception to
15 this general rule; under NRS 125B.110, Nevada's handicapped child support
16 statute; parents must support a handicapped child beyond the age of majority if
17 the child cannot support himself or herself because of a qualifying disability.
18 *Edgington v. Edgington*, 119 Nev. 577, 582, 80 P.3d 1282, 1286 (2003). NRS
19 125B.110 authorizes a court to obligate either or both parents to support his or her
20 handicapped child for an indefinite period, even if that child has reached the age
21 of majority.
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1 **B. ALECIA DRAPER’S SUPPORT OBLIGATION**

2
3 There are financial implications to this custody order. The obligation to support
4 one child is 16% of the obligor parent’s gross monthly income pursuant to NAC
5 425. Alecia Draper testified on August 6, 2020, that she earned \$49,000.00 per
6 year or \$4,100.00 per month. On January 11, 2021, Alecia Draper testified that
7 she has gross monthly income of \$4,260.00. Ms. Draper testified that she is a
8 51% owner of Moonwood Coffee Co., and that she receives \$1,000.00 per month
9 from that catering business. This testimony was contrasted by the profit and loss
10 statement that was attached to Alecia Draper’s Financial Disclosure Form that
11 was filed on April 9, 2019, that showed Moonwood Coffee Co.’s gross profits of
12 \$51,374.00 in the first quarter of 2019. The pandemic has materially affected the
13 business, but Alecia Draper testified that she received federal government
14 assistance including a PPP payment of \$17,000.00 and an EIDL loan of
15 \$117,000.00. The court concludes that Alecia Draper can receive more income
16 that \$1,000.00 per month from her ownership interest in Moonwood Coffee Co.

17
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20
21
22 Alecia Draper testified that the bulk of her income comes from her
23 compensation from the State of California for In-House Social Services. Alecia
24 Draper is paid \$14.50 per hour to care for Emily Reed. Alecia Draper testified
25 that she often incurs overtime. The court concludes that Alecia Draper’s true
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28

1 earning capacity for calculating her child support obligation is at least \$60,000.00
2 per year. On January 11, 2021, Alecia Draper testified that her income of
3 approximately \$4,200.00 per month was sufficient to pay her current living
4 expenses.
5

6
7 Alecia Draper testified that she is divorcing her husband and that she
8 receives no other sources of income. Ms. Draper testified that she will not
9 receive spousal support in her divorce settlement, and that while her two other
10 adult children live with her, unlike Emily, they do not pay rent or contribute to
11 household expenses. Alecia Draper testified that Emily pays her \$500.00 per
12 month, \$400.00 for rent and \$100.00 for a cellular phone.
13
14

15 Based on Alecia Draper's employment and earnings history, the court finds
16 that Ms. Draper's gross monthly income for calculating child support is
17 \$5,000.00, representing her current true earning capacity. 16% of \$5,000.00 is
18 \$800.00, which is the base child support calculation. The court exercises
19 discretion to adjust the child support formula amount by \$300.00, per month,
20 taking into consideration the collateral source of the other parent's child support
21 payment and the federal SSI and state benefits Emily receives. With this order,
22 Emily Reed will receive child support from her parents in the amount of
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1 \$1,000.00, plus SSI of \$686.24, plus \$250.00 on the arrears judgment, for a total
2 of \$1,936.24 per month.
3

4 Beginning on February 1, 2021, Alecia Draper should pay child support for
5 Emily Reed in the amount of \$500.00 per month. Payment shall be due on the
6 first day of each month thereafter.
7

8 The court concludes that Alecia Draper owes no constructive arears for
9 post majority child support. Emily Reed lives with Alecia Draper. The court
10 received substantial proof that Alecia Draper provided support for Emily Reed in
11 excess of an amount that might have been ordered since July, 2017.
12

13
14 The court concludes that this child support order complies with Nevada
15 law.
16

17 **C. JEFFREY REED'S SUPPORT OBLIGATION**
18

19 There are financial implications to this custody order. The obligation to
20 support one child is 16% of the obligor parent's gross monthly income pursuant
21 to NAC 425. Jeffrey Reed testified on January 11, 2021, that he was employed
22 by the Neptune Society, part of Palm Mortuary. Mr. Reed testified that he works
23 in a mortuary and that his income is based on sales commissions. Mr. Reed
24 testified that his 2020 gross annual income was \$38,000.00. In 2019, Jeffrey
25 Reed earned \$69,299.00. Exhibits 83, and 84, support the finding that Jeffrey
26
27
28

1 Reed earned \$80,301.00 in 2018 and \$78,564.00 in 2017. Jeffrey Reed testified
2 that because of a health issue, he changed to a less stressful job in 2019. Mr.
3 Reed testified that his income expectation in the less stressful job was \$50,000.00
4 - \$60,000.00 per year. Jeffrey Reed testified that he lives with a significant other,
5 and that she is employed, and they share monthly living expenses equally.
6
7

8 Based on Jeffrey Reed's employment and earnings history, the court finds
9 that Mr. Reed's gross monthly income for calculating child support is \$5,000.00,
10 representing his current true earning capacity. 16% of \$5,000.00 is \$800.00,
11 which is the base child support calculation. The court exercises discretion to
12 adjust the child support formula amount by \$300.00, per month, taking into
13 consideration the collateral source of the other parent's child support payment and
14 the federal SSI and state benefits Emily receives. With this order, Emily Reed
15 will receive child support from her parents in the amount of \$1,000.00, plus SSI
16 of \$686.24, plus \$250.00 on the arrears judgment, for a total of \$1,936.24 per
17 month.
18
19
20

21 Beginning on February 1, 2021, Jeffrey Reed should pay child support for
22 Emily Reed in the amount of \$500.00 per month. Payment shall be due on the
23 first day of each month thereafter.
24
25

26 The court concludes that Jeffrey Reed owes a judgment for constructive
27 post-majority child support. Jeffrey Reed voluntarily paid child support to Alecia
28

1 Draper for Emily for approximately two years after Emily reached age 18 and
2 graduated from high school. Mr. Reed paid no additional post-majority child
3 support for Emily after the countermotion was filed on July 21, 2017. The court
4 exercises its discretion to deviate or adjust the amount of constructive child
5 support arears after considering that Jeffrey Reed paid child support for Adam
6 Reed in the amount of \$903.00 per month until 2019. The court reviewed the
7 formula amount for two children in relationship to the gross income for 2017 –
8 2019, and reviewed the formula amount for one child for 2019 and 2020. The
9 court adjusted the formula support amount downward after considering the
10 collateral source of post-majority child support through SSI and the support from
11 Alecia Draper. The court concludes that the constructive arrears judgment should
12 be granted by multiplying an averaged net child support amount of \$500.00 by 43
13 months (July, 2017 - January, 2021). Judgment should be entered in favor of
14 Emily Reed against Jeffrey Reed in the amount of \$21,500.00. The court will
15 order a monthly payment on the arrears judgment in this order.
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21 The court concludes that this child support order complies with Nevada
22 law.
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1 **D. ALECIA DRAPER’S REIMBURSEMENT CLAIMS**

2

3 Alecia Draper seeks a judgment against Jeffrey Reed for monies that she

4 and her husband spent related to Emily Reed in 2017, 2018, and 2019, well after

5 Emily reached the age of majority. Alecia Draper summarized the claimed

6 expenses in Exhibit 82. Alecia Draper claims that she and her husband spent

7 \$33,752.00 in 2017, for cost of living, a therapy dog, Dr. Love, Dr. Rowanzoin,

8 and other medical expenses. Alecia Draper claims that she and her husband spent

9 \$40,623.35 in 2018, for cost of living, for conservatorship, a therapy dog, Dr.

10 Love, Dr. Rowanzoin, Dr. Boehm, and other medical expenses. Alecia Draper

11 claims that she and her husband spent \$50,057.00 in 2019, for cost of living, for

12 conservatorship, a therapy dog, Dr. Love, Dr. Boehm, and other medical

13 expenses. The court had difficulty reaching a conclusion that these expenses were

14 paid as alleged. The court had issues with the credibility of Alecia Draper’s

15 testimony and filings concerning her financial condition. Specifically, Alecia

16 Draper testified that she earned little or no income, and that her husband

17 contributed only \$5,000.00 to \$7,200.00 per month toward household expenses.

18 The allegation of available resources was inconsistent with the amount Alecia

19 Draper and her husband allege they spent on Emily Reed. Alecia Draper filed a

20 Financial Disclosure Form on July 21, 2017, alleging that she left employment in

21 June, 2017 to care for Emily. Alecia Draper filed a Financial Disclosure Form on

22

23

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1 April 9, 2019, alleging that she earned \$1,500.00 per month or \$18,000.00 in
2 2019. On August 6, 2020, Alecia Draper testified that she earns \$4,100.00 per
3 month or \$49,000.00 per year.
4

5 Emily reached the age of majority in 2014. Alecia Draper seeks a judgment
6 in excess of \$120,000.00 against Jeffrey Reed. There is no contract between the
7 parties for reimbursement for any of the post-majority living expenses for Emily.
8 Any responsibility for these expenses would have to come from Nevada statutes
9 or decisional law. The court concludes that the request for judgment should be
10 denied because Alecia Draper provided insufficient proof, and because the
11 amounts requested are disproportional to a parent's post-majority support
12 obligation pursuant to Nevada child support laws. The amount of post-majority
13 child support must have some relationship to income, the Nevada child support
14 formula, and adjustment or deviation considerations. The court concludes that
15 Alecia Draper's motion for judgment should be denied.
16
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19

20 ORDER

21
22 **WHEREFORE, IT IS HEREBY ORDERED** that the Alecia Draper's
23 motion, as Conservator for Emily Reed, for child support pursuant to NRS
24 125B.110 is granted. Alecia Draper and Jeffrey Reed shall pay child support to
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1 Emily Reed pursuant to this order, and those payments shall be managed and
2 accounted for by the Conservator pursuant to applicable California law.
3

4 **IT IS FURTHER ORDERED** that Alecia Draper shall pay child support
5 to Emily Reed in the amount of \$500.00 per month beginning February 1, 2021.
6 This child support obligation shall be paid on the first day of each month
7 thereafter, and may be modified or terminated by the court based on material
8 changes in circumstances.
9
10

11 **IT IS FURTHER ORDERED** that Jeffrey Reed shall pay child support to
12 Emily Reed in the amount of \$500.00 per month beginning February 1, 2021.
13 This child support obligation shall be paid on the first day of each month
14 thereafter, and may be modified or terminated by the court based on material
15 changes in circumstances.
16
17

18 **IT IS FURTHER ORDERED** that a judgment for constructive child
19 support arrears is granted in favor of Emily Reed against Jeffrey Reed in the
20 amount of \$21,500.00, representing \$500.00 per month owed from July, 2017
21 through January, 2021. This judgment shall be paid in the amount of \$250.00
22 per month beginning February 15, 2021. This arrears payment shall be paid on
23 the fifteenth day of each month thereafter, and may be modified by the court
24 based on material changes in circumstances.
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IT IS FURTHER ORDERED that Alecia Draper's request for judgment against Jeffrey Reed for post-majority monies spent by Ms. Draper and her husband for Emily Reed between 2017 and 2020 is denied.

IT IS FURTHER ORDERED that both parties shall bear their own costs incurred in this matter.

IT IS FURTHER ORDERED that this matter shall be closed upon the entry of this order.

Dated this 28th day of January, 2021

Art Ketchum

948 FB6 70E0 C363
T. Arthur Ritchie
District Court Judge

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA

4
5
6 Alecia A Reed, Plaintiff

CASE NO: 05D338668

7 vs.

DEPT. NO. Department H

8 Jeffrey A Reed, Defendant.

9
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 1/28/2021

15 Elizabeth Brennan .

elizabeth@brennanlawfirm.com

16 Elizabeth Brennan

elizabeth@brennanlawfirm.com

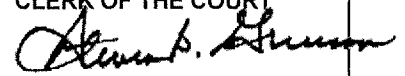
17 Amanda Roberts

efile@lvfamilylaw.com

18 Benjamin La Luzerne

ben.laluzerne@laluzernelaw.com

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1 NEOJ

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6 **DISTRICT COURT**
7 **FAMILY DIVISION**
8 **CLARK COUNTY, NEVADA**

9 ***

10 ALECIA A REED,

11 Plaintiff,

12 vs.

13 JEFFREY A REED,

14 Defendant.

CASE NO.: 05D338668
DEPARTMENT H

15
16 **NOTICE OF ENTRY OF ORDER**

17 TO: ALL PARTIES AND/OR THEIR ATTORNEYS

18
19 Please take notice that the Findings of Fact, Conclusions of Law and Order
20 from the Evidentiary hearing that concluded on January 12, 2021, was prepared
21 and filed by the court. A copy of the Findings of Fact, Conclusions of Law and
22 Order is attached hereto, and the following is a true and correct copy thereof.
23

24 I hereby certify that on or about the file stamp date the foregoing Notice of
25 Entry of Order was:
26
27
28

1 ☒ E-Served pursuant to NEFCR 9; or mailed, via first-class mail, postage
2 fully prepaid to:

3
4 Elizabeth R. Brennan, Esq. for
5 PLAINTIFF

6
7 Amanda M. Roberts, Esq. for
8 DEFENDANT

9
10 Katrina Rausch

11 Katrina Rausch
12 Judicial Executive Assistant
13 Department H
14
15
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1 ORDR
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5 **DISTRICT COURT**
6 **FAMILY DIVISION**
7 **CLARK COUNTY, NEVADA**

8 ALECIA A. REED, nka

9 Alecia Ann Draper,

10 Plaintiff,

11 vs.
12

13 JEFFREY A. REED,

14 Defendant.
15

CASE NO. 05D338668

DEPT. NO. H
16

17 **FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER**
18

19 This matter came on for evidentiary hearing before Art Ritchie, District
20 Court Judge, Family Division, Department H, on August 6, 2020, August 7, 2020,
21 November 19, 2020, and January 12, 2021. Alecia Draper and Emily Reed were
22 represented by Elizabeth R. Brennan, Esq. Jeffrey Reed was represented by
23 Amanda M. Roberts, Esq. The court reviewed the papers and pleadings on file,
24 the evidence admitted at the hearing, and for good cause, makes the following
25 findings of fact, conclusions of law, decision and order.
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1 on August 2, 2011. The court granted the motion to move, modified the visitation
2 order, and modified Jeffrey Reed's child support to \$725.00 per month.
3

4 Alecia Draper reopened the case on December 9, 2014, with the filing of
5 her motion to modify legal and physical custody. Jeffrey Reed's opposition and
6 countermotion was filed on January 2, 2015. The court set an evidentiary
7 hearing. At the evidentiary hearing the parties made a partial agreement. The
8 parties' Stipulation and Order from the January 12, 2015 hearing, was filed on
9
10 March 18, 2015. It contains the parties' agreement that the court will set an
11 evidentiary hearing to resolve Alecia Draper's request that child support continue
12 for Emily Reed after she graduates from high school due to a disability. The
13 parties agreed to continue the joint legal custody order, and modified Jeffrey
14 Reed's visitation. The parties agreed that Alecia Draper would provide insurance
15 for the children, and that Jeffrey Reed would pay \$66.00 per month beginning
16 January 1, 2015, towards the insurance cost. The parties agreed that Jeffrey
17 Reed's child support shall be based on an average income of \$60,000.00 per year.
18
19 Jeffrey Reed's child support was set at \$1,450.00 per month beginning January 1,
20 2015, with \$725.00 due on the fifth (5th) and \$725.00 due on the twentieth (20th)
21 day of each month.
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25 On January 14, 2015, the court filed an Order setting the evidentiary
26 hearing to resolve Alecia Draper's request that child support continue for Emily
27

1 Reed after she graduates from high school due to a disability for May 11, 2015.
2 On March 9, 2015, Alecia Draper, through counsel, filed Plaintiff's Notice of
3 Withdrawal of request to Continue Child Support for Emily after High School
4 Graduation Due to Child Disability & Request to Vacate Evidentiary Hearing.
5 The court vacated the evidentiary hearing, and Department S statistically closed
6 the case on June 29, 2015, citing the parties' Stipulation and Order filed on March
7 18, 2015.
8
9

10
11 Jeffrey Reed reopened the case on June 29, 2017, with the filing of his
12 motion to modify child support based upon emancipation of a child. Alecia
13 Draper filed her opposition and countermotion for child support for Emily
14 pursuant to NRS 125B.110 on July 21, 2017. The matter was heard on August
15 28, 2017. At the hearing, the parties agreed that two of the three children had
16 emancipated. The parties agreed that Jeffrey Reed would pay the presumed
17 maximum for one child, \$837.00 per month, plus \$66.00 per month towards
18 insurance for the remaining minor child. The court continued the matter to
19 November 8, 2017, to address the claim for post-majority support for Emily. The
20 order from the hearing was filed on December 15, 2017.
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25 The court heard the matter on November 8, 2017. The court requested
26 briefings in anticipation of an evidentiary hearing. On January 2, 2018, Jeffrey
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28

1 Reed filed a motion for summary judgment. Alecia Draper's opposition was filed
2 on February 8, 2018. The matter was heard on April 9, 2018. The court took the
3 matter under advisement for decision. Judge Ochoa denied the motion for
4 summary judgment in his Decision and Order filed on May 22, 2018. The court
5 found, in part, that even though Alecia Draper's request to continue child support
6 for Emily was withdrawn on March 9, 2015, Jeffrey Reed continued to pay child
7 support for Emily for the next two years until he filed for child support
8 modification on June 29, 2017. The court found that Emily was receiving Social
9 Security Disability payments, and that there was a factual dispute about whether
10 Emily was disabled prior to age 18, and not able to engage in any substantial
11 gainful activity by reason of her significant and chronic mental impairment. The
12 court concluded that Emily had the right to bring her own action for support from
13 her parents. The court concluded that while a separate action for support was
14 available to Emily because she was an adult, this claim for post-majority child
15 support against the parents could be brought in the parties' divorce case.

21 On July 23, 2018, the case was administratively reassigned to Department
22 H. Alecia Draper became Emily Reed's legal guardian in California in October,
23 2018. On January 22, 2019, Alecia Draper filed a Notice of Joinder in her
24 individual capacity and as Conservator for Emily Reed. On January 22, 2019,
25 Alecia Draper, as Conservator for Emily Reed, filed a motion for child support
26

1 pursuant to NRS 125B.110. The motion was set for hearing on March 4, 2019.
2 Prior to the hearing, the parties submitted a stipulation and order to continue the
3 hearing. On April 9, 2019, Jeffrey Reed filed a motion to disqualify counsel from
4 bringing the child support claim on behalf of Emily Reed. On April 10, 2019,
5 Alecia Draper, as Conservator for Emily Reed, filed an amended motion for child
6 support pursuant to NRS 125B.110, clarifying that Ms. Draper is seeking child
7 support for Emily solely from Jeffrey Reed. The matter was heard on April 10,
8 2019. The court granted the motion to join Emily Reed as a party in interest. The
9 court set a discovery schedule, and set a case management conference for July 24,
10 2019.

11
12 The matter was heard on July 24, 2019. The court received a report from
13 counsel concerning the status of discovery, and continued the case management
14 conference to October 23, 2019. On that date, the court received a report from
15 counsel concerning the status of discovery, and continued the case management
16 conference to January 8, 2020. The matter was heard on January 8, 2020, and
17 this case was set for evidentiary hearing on April 16, 2020, and April 17, 2020.

18
19 After the entry of Administrative Orders, AO 20-09 and AO 20-11 in
20 response to the COVID-19 pandemic, the court scheduled a telephone conference
21 with counsel. On March 31, 2020, the court spoke with counsel, and found good

1 cause to continue the evidentiary hearing. The matter was rescheduled for June
2 18, 2020, and June 19, 2020. The court filed a Second Amended Order Setting
3 Evidentiary Hearing on May 12, 2020, resetting the evidentiary hearing for
4 August 6, 2020, and August 7, 2020.
5

6
7 The evidentiary hearing was held over four days between August 6, 2020,
8 and January 12, 2021. Alecia Draper, Jennifer Love Farrell, Emily Reed, and
9 Jeffrey Reed testified. The court received closing briefs, and the matter was
10 submitted for this decision and order. The court concludes that the witness
11 testimony and the documentary proof admitted at the hearing were sufficient for
12 the court to decide the child support matter.
13
14

15 **FINDINGS AND CONCLUSIONS**

16

17 This court has subject matter jurisdiction and personal jurisdiction over the
18 parties to this case.
19

20 **A. POST- MAJORITY CHILD SUPPORT**

21

22 **NRS 125B.110 Support of child with handicap beyond age of majority.**

23 1. A parent shall support beyond the age of majority his or her child with a
24 handicap until the child is no longer handicapped or until the child becomes self-
25 supporting. The handicap of the child must have occurred before the age of
26 majority for this duty to apply.
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2. For the purposes of this section, a child is self-supporting if the child receives public assistance beyond the age of majority and that assistance is sufficient to meet the child's needs.

3. This section does not impair or otherwise affect the eligibility of a person with a handicap to receive benefits from a source other than his or her parents.

4. As used in this section, “handicap” means an inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months.
(Added to NRS by 1987, 2268; A 1991, 1336)

The court concludes that the duty to support Emily Reed applies to both parents based on its finding that Emily Reed was handicapped prior to her reaching the age of majority. The court finds that Emily Reed suffered significant mental and physical trauma prior to reaching the age of majority, and that Alecia Draper proved that Emily suffers from severe mental illness. Emily was sexually abused for more than eight years during her minority. The molestation was not discovered until 2014. Emily attempted suicide more than once before she graduated from high school. Records admitted at trial show that Emily suffered panic attacks, and injured herself while in high school. Emily applied for SSI in March, 2014, and she was granted Social Security Disability benefits in October, 2015. Jeffrey Reed advanced a defense that Emily was not disabled before she reached the age of majority, and that Emily is not currently disabled. The court heard evidence that Emily graduated from high school with a 3.78 GPA, obtained a California driver's license, and has some independence in Alecia Draper's

1 home. The court weighed the evidence as the trier of fact and concludes that
2 Emily is handicapped and that her mental health issues began prior to the age of
3 majority. Emily has been diagnosed with Post Traumatic Stress Disorder (PTSD),
4 Dissociative Identity Disorder, Major Depressive Disorder, and Dependent
5 Personality Disorder. Exhibit 5 shows that Emily was diagnosed with PTSD,
6 Major Depressive Disorder, and Anxiety Disorder before she turned age eighteen.
7
8

9 Emily is being treated by Dr. Jennifer Love Farrell (Dr. Love). Alecia
10 Draper selected Dr. Love to manage Emily's medication. Dr. Love testified on
11 August 6, 2020, that she has seen Emily approximately 46 times since 2016.
12 Exhibit 14 and Dr. Love's testimony support the finding that Emily continues to
13 suffer from chronic PTSD, Major Depressive Disorder, and Dissociative Identity
14 Disorder, and Dr. Love describes Emily as one of her most severely ill patients.
15 Emily was hospitalized most recently from December 31, 2019, through January
16 27, 2020.
17
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20 Dr. Love testified that Emily has many "alters" and that Emily will switch
21 personalities frequently. Dr. Love testified that Emily suffers auditory
22 hallucinations, and engages in strange public behavior. The court had the
23 opportunity to see Emily testify on August 6, 2020. Emily answered questions
24 from counsel, and testified through several "alters". The court heard from Heidi,
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1 age 7; Lilly, age 16; Holly, age 2; Dorothy, age 9; and Rose. Emily did not
2 engage as Emily during the testimony. This part of the case was unsettling.
3
4 Counsel for Alecia Draper spoke with Emily the day before the testimony, and
5 coordinated how she would examine Emily and the “alters”. This made Emily’s
6 testimony look contrived. The court carefully considered all of the evidence and
7
8 concludes that Emily’s testimony was not contrived, and was consistent with the
9 observations of Emily’s treating doctors, and the documentary proof.

10
11 The court concludes that Emily Reed is not self-supporting, and that her
12 Social Security Disability benefits are insufficient to meet her needs. A
13 Conservatorship or Guardianship to manage Emily Reed’s person and estate was
14 granted in October, 2018, by a California court. Alecia Draper filed a Financial
15 Disclosure Form for Emily on August 4, 2020. Emily Reed receives monthly
16 income of \$686.24 SSI, plus \$194.00 from Cal Fresh. Emily’s expenses are
17
18 \$48.00 for a cellular phone, \$228.00 for food, \$376.75 for insurance, and \$600.00
19 for rent paid to Alecia Draper. Additional expenses include ongoing professional
20 fees for Dr. Love’s treatment that are not covered by insurance.

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23 The court concludes that Emily Reed is unable to engage in any
24 substantially gainful activity by reason of a medically determinable physical or
25 mental impairment which has lasted for a continuous period of not less than
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1 twelve months. "Substantial gainful activity" means economic activity that
2 results in the child being financially self-supporting. *Edgington v. Edgington*, 119
3 Nev. 577, 585, 80 P.3d 1282, 1288 (2003). The Nevada handicapped child
4 support statute is designed to ensure that handicapped children have adequate
5 ongoing financial support from their parents, if needed. *Edgington v. Edgington*,
6 119 Nev. 577, 585, 80 P.3d 1282, 1288 (2003).
7
8

9 NRS 125B.110 was intended to require parents to bear some of the
10 financial burden for the support of their disabled child. As a general rule, court
11 ordered support obligations cease "[w]hen the child reaches 18 years of age if he
12 is no longer enrolled in high school, otherwise, when he reaches 19 years of age."
13 The law presumes that once a child reaches the age of majority, the child is
14 capable of self-support. Nevada's Legislature has created a statutory exception to
15 this general rule; under NRS 125B.110, Nevada's handicapped child support
16 statute; parents must support a handicapped child beyond the age of majority if
17 the child cannot support himself or herself because of a qualifying disability.
18 *Edgington v. Edgington*, 119 Nev. 577, 582, 80 P.3d 1282, 1286 (2003). NRS
19 125B.110 authorizes a court to obligate either or both parents to support his or her
20 handicapped child for an indefinite period, even if that child has reached the age
21 of majority.
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1 **B. ALECIA DRAPER'S SUPPORT OBLIGATION**

2
3 There are financial implications to this custody order. The obligation to support
4 one child is 16% of the obligor parent's gross monthly income pursuant to NAC
5 425. Alecia Draper testified on August 6, 2020, that she earned \$49,000.00 per
6 year or \$4,100.00 per month. On January 11, 2021, Alecia Draper testified that
7 she has gross monthly income of \$4,260.00. Ms. Draper testified that she is a
8 51% owner of Moonwood Coffee Co., and that she receives \$1,000.00 per month
9 from that catering business. This testimony was contrasted by the profit and loss
10 statement that was attached to Alecia Draper's Financial Disclosure Form that
11 was filed on April 9, 2019, that showed Moonwood Coffee Co.'s gross profits of
12 \$51,374.00 in the first quarter of 2019. The pandemic has materially affected the
13 business, but Alecia Draper testified that she received federal government
14 assistance including a PPP payment of \$17,000.00 and an EIDL loan of
15 \$117,000.00. The court concludes that Alecia Draper can receive more income
16 that \$1,000.00 per month from her ownership interest in Moonwood Coffee Co.
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22 Alecia Draper testified that the bulk of her income comes from her
23 compensation from the State of California for In-House Social Services. Alecia
24 Draper is paid \$14.50 per hour to care for Emily Reed. Alecia Draper testified
25 that she often incurs overtime. The court concludes that Alecia Draper's true
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28

1 earning capacity for calculating her child support obligation is at least \$60,000.00
2 per year. On January 11, 2021, Alecia Draper testified that her income of
3 approximately \$4,200.00 per month was sufficient to pay her current living
4 expenses.
5

6
7 Alecia Draper testified that she is divorcing her husband and that she
8 receives no other sources of income. Ms. Draper testified that she will not
9 receive spousal support in her divorce settlement, and that while her two other
10 adult children live with her, unlike Emily, they do not pay rent or contribute to
11 household expenses. Alecia Draper testified that Emily pays her \$500.00 per
12 month, \$400.00 for rent and \$100.00 for a cellular phone.
13
14

15 Based on Alecia Draper's employment and earnings history, the court finds
16 that Ms. Draper's gross monthly income for calculating child support is
17 \$5,000.00, representing her current true earning capacity. 16% of \$5,000.00 is
18 \$800.00, which is the base child support calculation. The court exercises
19 discretion to adjust the child support formula amount by \$300.00, per month,
20 taking into consideration the collateral source of the other parent's child support
21 payment and the federal SSI and state benefits Emily receives. With this order,
22 Emily Reed will receive child support from her parents in the amount of
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1 \$1,000.00, plus SSI of \$686.24, plus \$250.00 on the arrears judgment, for a total
2 of \$1,936.24 per month.

3
4 Beginning on February 1, 2021, Alecia Draper should pay child support for
5 Emily Reed in the amount of \$500.00 per month. Payment shall be due on the
6 first day of each month thereafter.

7
8 The court concludes that Alecia Draper owes no constructive arears for
9 post majority child support. Emily Reed lives with Alecia Draper. The court
10 received substantial proof that Alecia Draper provided support for Emily Reed in
11 excess of an amount that might have been ordered since July, 2017.

12
13
14 The court concludes that this child support order complies with Nevada
15 law.

16
17 **C. JEFFREY REED'S SUPPORT OBLIGATION**

18
19 There are financial implications to this custody order. The obligation to
20 support one child is 16% of the obligor parent's gross monthly income pursuant
21 to NAC 425. Jeffrey Reed testified on January 11, 2021, that he was employed
22 by the Neptune Society, part of Palm Mortuary. Mr. Reed testified that he works
23 in a mortuary and that his income is based on sales commissions. Mr. Reed
24 testified that his 2020 gross annual income was \$38,000.00. In 2019, Jeffrey
25 Reed earned \$69,299.00. Exhibits 83, and 84, support the finding that Jeffrey
26
27

1 Reed earned \$80,301.00 in 2018 and \$78,564.00 in 2017. Jeffrey Reed testified
2 that because of a health issue, he changed to a less stressful job in 2019. Mr.
3 Reed testified that his income expectation in the less stressful job was \$50,000.00
4 - \$60,000.00 per year. Jeffrey Reed testified that he lives with a significant other,
5 and that she is employed, and they share monthly living expenses equally.
6

7
8 Based on Jeffrey Reed's employment and earnings history, the court finds
9 that Mr. Reed's gross monthly income for calculating child support is \$5,000.00,
10 representing his current true earning capacity. 16% of \$5,000.00 is \$800.00,
11 which is the base child support calculation. The court exercises discretion to
12 adjust the child support formula amount by \$300.00, per month, taking into
13 consideration the collateral source of the other parent's child support payment and
14 the federal SSI and state benefits Emily receives. With this order, Emily Reed
15 will receive child support from her parents in the amount of \$1,000.00, plus SSI
16 of \$686.24, plus \$250.00 on the arrears judgment, for a total of \$1,936.24 per
17 month.
18

19
20
21 Beginning on February 1, 2021, Jeffrey Reed should pay child support for
22 Emily Reed in the amount of \$500.00 per month. Payment shall be due on the
23 first day of each month thereafter.
24

25
26 The court concludes that Jeffrey Reed owes a judgment for constructive
27 post-majority child support. Jeffrey Reed voluntarily paid child support to Alecia
28

1 Draper for Emily for approximately two years after Emily reached age 18 and
2 graduated from high school. Mr. Reed paid no additional post-majority child
3 support for Emily after the countermotion was filed on July 21, 2017. The court
4 exercises its discretion to deviate or adjust the amount of constructive child
5 support arears after considering that Jeffrey Reed paid child support for Adam
6 Reed in the amount of \$903.00 per month until 2019. The court reviewed the
7 formula amount for two children in relationship to the gross income for 2017 –
8 2019, and reviewed the formula amount for one child for 2019 and 2020. The
9 court adjusted the formula support amount downward after considering the
10 collateral source of post-majority child support through SSI and the support from
11 Alecia Draper. The court concludes that the constructive arrears judgment should
12 be granted by multiplying an averaged net child support amount of \$500.00 by 43
13 months (July, 2017 - January, 2021). Judgment should be entered in favor of
14 Emily Reed against Jeffrey Reed in the amount of \$21,500.00. The court will
15 order a monthly payment on the arrears judgment in this order.
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21 The court concludes that this child support order complies with Nevada
22 law.
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1 **D. ALECIA DRAPER'S REIMBURSEMENT CLAIMS**

2

3 Alecia Draper seeks a judgment against Jeffrey Reed for monies that she

4 and her husband spent related to Emily Reed in 2017, 2018, and 2019, well after

5 Emily reached the age of majority. Alecia Draper summarized the claimed

6 expenses in Exhibit 82. Alecia Draper claims that she and her husband spent

7 \$33,752.00 in 2017, for cost of living, a therapy dog, Dr. Love, Dr. Rowanzoin,

8 and other medical expenses. Alecia Draper claims that she and her husband spent

9 \$40,623.35 in 2018, for cost of living, for conservatorship, a therapy dog, Dr.

10 Love, Dr. Rowanzoin, Dr. Boehm, and other medical expenses. Alecia Draper

11 claims that she and her husband spent \$50,057.00 in 2019, for cost of living, for

12 conservatorship, a therapy dog, Dr. Love, Dr. Boehm, and other medical

13 expenses. The court had difficulty reaching a conclusion that these expenses were

14 paid as alleged. The court had issues with the credibility of Alecia Draper's

15 testimony and filings concerning her financial condition. Specifically, Alecia

16 Draper testified that she earned little or no income, and that her husband

17 contributed only \$5,000.00 to \$7,200.00 per month toward household expenses.

18 The allegation of available resources was inconsistent with the amount Alecia

19 Draper and her husband allege they spent on Emily Reed. Alecia Draper filed a

20 Financial Disclosure Form on July 21, 2017, alleging that she left employment in

21 June, 2017 to care for Emily. Alecia Draper filed a Financial Disclosure Form on

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1 April 9, 2019, alleging that she earned \$1,500.00 per month or \$18,000.00 in
2 2019. On August 6, 2020, Alecia Draper testified that she earns \$4,100.00 per
3 month or \$49,000.00 per year.
4

5 Emily reached the age of majority in 2014. Alecia Draper seeks a judgment
6 in excess of \$120,000.00 against Jeffrey Reed. There is no contract between the
7 parties for reimbursement for any of the post-majority living expenses for Emily.
8 Any responsibility for these expenses would have to come from Nevada statutes
9 or decisional law. The court concludes that the request for judgment should be
10 denied because Alecia Draper provided insufficient proof, and because the
11 amounts requested are disproportional to a parent's post-majority support
12 obligation pursuant to Nevada child support laws. The amount of post-majority
13 child support must have some relationship to income, the Nevada child support
14 formula, and adjustment or deviation considerations. The court concludes that
15 Alecia Draper's motion for judgment should be denied.
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21 **ORDER**

22 **WHEREFORE, IT IS HEREBY ORDERED** that the Alecia Draper's
23 motion, as Conservator for Emily Reed, for child support pursuant to NRS
24 125B.110 is granted. Alecia Draper and Jeffrey Reed shall pay child support to
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1 Emily Reed pursuant to this order, and those payments shall be managed and
2 accounted for by the Conservator pursuant to applicable California law.
3

4 **IT IS FURTHER ORDERED** that Alecia Draper shall pay child support
5 to Emily Reed in the amount of \$500.00 per month beginning February 1, 2021.
6 This child support obligation shall be paid on the first day of each month
7 thereafter, and may be modified or terminated by the court based on material
8 changes in circumstances.
9
10

11 **IT IS FURTHER ORDERED** that Jeffrey Reed shall pay child support to
12 Emily Reed in the amount of \$500.00 per month beginning February 1, 2021.
13 This child support obligation shall be paid on the first day of each month
14 thereafter, and may be modified or terminated by the court based on material
15 changes in circumstances.
16
17

18 **IT IS FURTHER ORDERED** that a judgment for constructive child
19 support arrears is granted in favor of Emily Reed against Jeffrey Reed in the
20 amount of \$21,500.00, representing \$500.00 per month owed from July, 2017
21 through January, 2021. This judgment shall be paid in the amount of \$250.00
22 per month beginning February 15, 2021. This arrears payment shall be paid on
23 the fifteenth day of each month thereafter, and may be modified by the court
24 based on material changes in circumstances.
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IT IS FURTHER ORDERED that Alecia Draper's request for judgment against Jeffrey Reed for post-majority monies spent by Ms. Draper and her husband for Emily Reed between 2017 and 2020 is denied.

IT IS FURTHER ORDERED that both parties shall bear their own costs incurred in this matter.

IT IS FURTHER ORDERED that this matter shall be closed upon the entry of this order.

Dated this 28th day of January, 2021

Art Kitchie

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T. Arthur Ritchie
District Court Judge

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA

4
5
6 Alecia A Reed, Plaintiff

CASE NO: 05D338668

7 vs.

DEPT. NO. Department H

8 Jeffrey A Reed, Defendant.
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 1/28/2021

15 Elizabeth Brennan .

elizabeth@brennanlawfirm.com

16 Elizabeth Brennan

elizabeth@brennanlawfirm.com

17 Amanda Roberts

efile@lvfamilylaw.com

18 Benjamin La Luzerne

ben.laluzerne@laluzernelaw.com

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