

1 **ASTA**

2 **FRED PAGE, ESQ.**

3 **NEVADA BAR NO. 6080**

4 **PAGE LAW FIRM**

5 **5940 SOUTH CIMARRON ROAD, SUITE 140**

6 **LAS VEGAS, NEVADA 89113**

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Attorney for Appellant

Electronically Filed
Jul 06 2021 06:38 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

7 **EIGHTH JUDICIAL DISTRICT COURT**
8 **CLARK COUNTY, NEVADA**

9 **MINH NGUYET LUONG,**

10 **Appellant,**

11 **vs.**

12 **JAMES VAHEY,**

13 **Respondent.**

} Supreme Court Case No.: 83098

} District Court Case No. D-18-581444-D

14
15 **CASE APPEAL STATEMENT**

16
17 **TO: Appellant, MINH LUONG**

18 **TO: Respondent, JAMES W. VAHEY**

19 **TO: Attorney for Respondent, ROBERT P. DICKERSON, ESQ.**

20
21 **Name of the Appellant filing this case appeal statement:**

22 **Minh Nguyet Luong**

23
24 **1. Identify the judge issuing the decision, judgment or order appealed from:**

25 **HON. DAWN THRONE**

26
27 **2. Identify each appellant and the name and address of counsel of each**
28 **appellant:**

1 Appellant: Minh Nguyet Luong

2 Counsel for Appellant:

3 Fred Page, Esq.
4 Page Law Firm
5 6930 South Cimarron Rd, Suite 140
6 Las Vegas, Nevada 89113

7 District Court Counsel for Appellant:

8 Fred Page, Esq.
9 Page Law Firm
10 6930 South Cimarron Rd, Suite 140
11 Las Vegas, Nevada 89113

12 Neil Mullins, Esq.
13 Kainen Law Group
14 3303 Novat Street, Suite 200
15 Las Vegas, Nevada 89129

16 3. Identify each respondent in the name and address of appellate counsel, if
17 known, for each respondent:

18 Respondent: James W. Vahey

19 Counsel for Respondent: Robert Dickerson, Esq.
20 Dickerson Karacsonyi Law Group
21 1745 Village Center Circle
22 Las Vegas, Nevada 89134

23 District Court Counsel: Robert Dickerson, Esq.
24 Dickerson Karacsonyi Law Group
25 1745 Village Center Circle
26 Las Vegas, Nevada 89134
27
28

1 4. Indicate whether any attorney identified above in response to question 3
2 or 4 is not licensed to practice law in Nevada and, if so, whether the
3 District Court granted that attorney permission to appear under SCR42:

4 None.

5 5. Indicate whether appellant was represented by appointed counsel or
6 retained counsel in the District Court:

7 Appellant was represented by retained counsel in the district court.

8 6. Indicate whether appellant is represented by appointed or retained
9 counsel on appeal:

10 Appellant is represented by retained counsel on appeal.

11 7. Indicate whether was granted leave to proceed in *forma pauperis*, and the
12 date of entry of the District Court order granting such leave:

13 Not applicable.

14 8. Indicate the date the proceedings were commenced in District Court:

15 The Complaint for Divorce was filed on December 13, 2018, in the Eighth
16 Judicial District.

17 9. Provide a brief description of the nature of the action and the result in the
18 District Court, including the type of judgment or order be appealed and
19 relief granted by the District Court:

20 **Nature of the Action**

21 The nature of the action is a Motion filed to Enter the Decree of Divorce that
22 was filed on February 11, 2021. In the Motion, it was requested of the district
23 court judge to determine what the summer visitation schedule would be, the
24 holiday visitation schedule, whether the receiving parent should pick up, who
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1 should provide health insurance for the children, to change custody, for orders
2 regarding telephone contact, and for a child interview.

3 The district court heard the matter on March 22, 2021. At that hearing, the
4 district court ordered additional briefing on the issues of health insurance,
5 exchange location, and telephone contact. The district court heard additional
6 argument on those issues on April 13, 2021. At that hearing, the district court then
7 ordered additional briefing on the health insurance issue.
8
9

10 **Type of Judgment or Order Being Appealed From**

11 The type of judgment or order being appealed is an Order after hearing.
12

13 **Result in the District Court**

14 The result in district court was that the district court judge ordered that both
15 parties could provide health insurance to for the minor children, that Minh would
16 have to continue providing all of the transportation, and that limits would be placed
17 on both parties' ability to speak to the children telephonically when the children
18 during the other parent's custodial timeshare.
19
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21

22 **Orders Being Appealed and Relief Granted**

23 The orders being appealed from are the district court's orders that required
24 Minh to continue providing 100 percent of the transportation and that limits
25 Minh's ability to have telephone contact with the children during Jim's custodial
26 timeshare.
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1
2 10. Indicate whether the case has previously been the subject of appeal to or
3 original writ proceeding to the Supreme Court and, if so, the caption and
4 Supreme Court docket number of the prior proceeding:

5 None.

6 11. Indicate whether this appeal involves child custody or visitation:

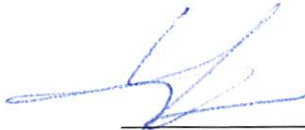
7
8 Appellants' appeal does involve child custody and visitation.

9 12. If this is a civil case, indicate whether this appeal involves a possibility
10 of settlement:

11 Settlement is unlikely.

12
13 DATED this 6th day of July 2021

14 PAGE LAW FIRM

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17 FRED PAGE, ESQ.

18 Nevada Bar No. 6080

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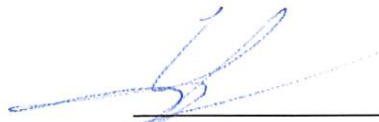
22 (702) 628-9884 fax

23 *Attorney for Appellants*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6th day of July 2021, the Appellant's CASE APPEAL STATEMENT was served electronically with the Clerk of the Nevada Supreme Court and service pursuant to the United States mail, postage prepaid, was made in accordance with the master service list maintained by the Clerk of the Supreme Court to the attorney listed below.

Robert P. Dickerson, Esq.
Dickerson Karacsonyi Law Group
1745 Village Center Circle
Las Vegas, Nevada 89134
Counsel for Respondent



An employee of Page Law Firm