



View Message

From: Devin Reed

To: Amanda Reed
(First View: Now)

Electronically Filed
Jan 10 2022 10:34 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

RE: Your dad
(Sent: 12/17/2018 08:36 AM)

She will be going to her zoned school due to our high conflict of hatred of each other . I dont give a fuck about your day.

On 12/17/2018 08:12 AM Amanda Reed wrote:

My dad is with Mrs. Young...the AP in the crosswalk. He is out there with her every day. I am on the kindergarten playground to change her outfit into snowman day because you won't dress her for spirit days. I am a kindergarten sped teacher Devin. Those kids on that playground are mine as well. I am at least 200 feet plus from you and do not go near the gate on your days.

Please make sure Shawn is at La's at 8. You need to drop him off before dropping Abby off. You just had him at the school at 8am.



EXHIBIT “F”

EXHIBIT “F”

EXHIBIT “F”



View Message

From: Devin Reed

To: Amanda Reed

(First View: Now)

Insurance on expedition paq

(Sent: 12/04/2018 05:17 PM)

You think that shit today was funny . I will never do you a favor here forward . I am canceling your expedition insurance so get your own . I don't care what you do w my phone line . Keep it cancel it i don't care . I no longer care about it . I will keep insurance on my truck i do not require to keep insurance on your expedition / pay me my money from house when will that be i will pay off truck immediately: I will be doing this tomorrow . Im done with you :



EXHIBIT “G”

EXHIBIT “G”

EXHIBIT “G”



View Message

From: Devin Reed

To: Amanda Reed

(First View: 08/28/2018 03:44 PM)

RE: Therapy for Abby

(Sent: 08/28/2018 03:17 PM)

I'm sure it wouldn't hurt for her to go to psycho therapy

but. Is she acting out? Is she showing behavior issues that I don't see? What do you believe the benefits for therapy would be ?

Because what what I see is a smart thriving happy 5 year old that is full of life and her spirit is strong. She is not at all depressed that I see. She is always laughing and engaged in everything she does.

What am I missing ?

On 08/28/2018 12:07 PM Amanda Reed wrote:

The child therapist for Abby emailed me saying Abby can start coming on Tuesdays at 5:45. This would be weekly. You signed consent forms at mediation. Would you be able to take her on the weeks you have the babies?



EXHIBIT “H”

EXHIBIT “H”

EXHIBIT “H”



View Message

From: Devin Reed

To: Amanda Reed

(First View: 12/29/2018 11:53 AM)

RE: One more:

(Sent: 12/29/2018 11:53 AM)

What day is that ?

On 12/29/2018 09:54 AM Amanda Reed wrote:

2pm

1489 W. Warm Springs Road, Suite 110
Henderson, NV 89014

You just wait in the lobby and she will come out

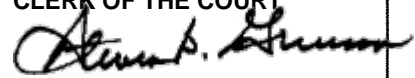
On 12/25/2018 04:41 PM Devin Reed wrote:

Actually I would like to take her to therapy what time is the appointment I will take her

On 12/25/2018 08:29 AM Amanda Reed wrote:

Abby's therapist: are you going to take her? I need to email her therapist if you are not planning on taking her





LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number: 009683
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-435-2121
Fax: 702-431-3807
lcsllawllc@gmail.com
Attorney for the Plaintiff,
Devin Reed

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

DEVIN REED,)		
)	Case Number:	D-18-568055-D
Plaintiff,)	Department:	F
)		
vs.)		
)	Date of Hearing:	January 22, 2018
AMANDA REED,)	Time of Hearing:	9:00 a.m.
)		
Defendant.)		

**DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR AN ORDER TO SHOW
CAUSE AND COUNTERMOTION AND OTHER RELATED MATTERS**

COMES NOW Defendant, DEVIN REED, by and through his attorney, JOHN H. HOWARD, JR., ESQ., and files his Opposition and Countermotion for the following relief. This Opposition and Countermotion is made and based upon papers, pleadings and files in this action and upon the affidavits and exhibits attached hereto and arguments to be adduced at hearing.

1. To deny Defendant's motion for an order to show cause;
2. For an order directing the parties attend the UNLV Cooperative Parenting Classes;
3. For the Court to appoint a Parenting Coordinator;
4. For an order confirming custodial timeshare and child support;
5. For an order denying Defendant's request to inspect his home;
6. That the Court also award the Defendant reasonable attorney fees.

DATED this 18th day of January, 2019.

/s/ Louis C. Schneider
LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number: 009683

LOUIS C. SCHNEIDER, LLC.
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-430-2121

1 **I. HISTORY OF THE CASE**

2 Plaintiff and Defendant were married on or before October 2, 2008. The parties have tow
3 minor children to-wit: Abby Reed, born April 6, 2013; and Shawn Reed, born July 3, 2015. Plaintiff
4 filed for his Complaint for Divorce on March 20, 2018 and Defendant filed her Answer and
5 Counterclaim April 10, 2018. Prior to filing the action herein the parties were experiencing numerous
6 issues with their relationship. The parties had been living separately since February 5, 2018 with
7 Plaintiff living in the motorhome adjacent to the house merely to avoid conflict with Defendant. Now
8 Defendant find such living conditions unsuitable for the parties minor children. Plaintiff is currently
9 helping a friend remodel his home and is currently living in the home. The circumstances
10 surrounding Plaintiff's living conditions are not permanent. Defendant has no right to inspect the
11 Plaintiff's home. This request is highly invasive and proof of her controlling behavior.

12 Defendant knows that Plaintiff has lost his job and it is Plaintiff belief that she is the cause
13 of his lack of employment. Plaintiff has been actively searching for work and is on the Union call list
14 waiting to be called out. Although Plaintiff has lost his job he as been diligently attempting to pay
15 his financial obligations.

16 The timeshare should not be an issues. Plaintiff loves his children and truly enjoys being with
17 them. Defendant insists on micro-managing Plaintiff's time with the children demanding he follower
18 her rules and that he drop them off in a specific order. When Defendant is not able to control the
19 Plaintiff she contacts her attorney. With the current schedule there is more contact than is necessary.
20 The parties should change the schedule to a week on week off with one exchange on either Friday or
21 another agreed upon day. Furthermore, each party should be solely responsible for any daycare,
22 including the expenses thereon, during their timeshare.

23 The parties in the case would greatly benefit from attending the UNLV Cooperative Parenting
24 Class and/or meet and discuss their issues with a Parenting Coordinator to hopefully reduce some
25 conflict between the parties and possible reduce any Attorney and Court involvement. Both parties
26 are at fault for intentionally pushing each other's buttons. Each should look into some post marital
27 counseling.

1 Child support should remain status quo since Plaintiff is currently unemployed but reviewable
2 once Plaintiff is gainfully employed. Defendant claims that Plaintiff is willfully unemployed or
3 underemployed and is avoiding paying child support. Again it is Plaintiff's belief that Defendant
4 contacted his prior employer and got him fired. Plaintiff states he has been active searching for
5 employment but because he is apart of a Union he cannot take just any job. As Defendant is fully
6 aware, Plaintiff can only take jobs that are offered through the Union.

7 Plaintiff is perfectly fine with having the marital residence appraised to assess the value of the
8 property and splitting the costs. Plaintiff simply requests that the parties select a reasonable and fairly
9 priced appraiser.

10 Both parties have violated the Mutual Behavior Order, unfortunately it is Plaintiff who has
11 put his anger in writing. It is obvious that Plaintiff was deeply and traumatically hurt when he
12 realized the long relationship between the parties was finally over. Plaintiff is now focused solely on
13 his children and wished he and the Defendant can eventually co-parent and cooperate in raising their
14 children.

15 **DATED** this 18th day of January, 2019.

16
17 /s/ Louis C. Schneider
18 **LOUIS C. SCHNEIDER, ESQ.**
Nevada Bar Number: 009683
19
20
21
22
23
24
25
26
27
28

Divorce - Complaint

COURT MINUTES

January 22, 2019

D-18-568055-D Devin Bryson Reed, Plaintiff
vs.
Amanda Raelene Reed, Defendant.

January 22, 2019 09:00 AM All Pending Motions

HEARD BY: Gentile, Denise L COURTROOM: Courtroom 03

COURT CLERK: McCulloch, Melissa

PARTIES PRESENT:

Devin Bryson Reed, Counter Defendant, Plaintiff, Present Louis C. Schneider, Attorney, Present

Amanda Raelene Reed, Counter Claimant, Defendant, Present Carrie J. Primas, ESQ, Attorney, Present

Abby Reed, Subject Minor, Not Present Harvey Gruber, Attorney, Not Present

Shawn Reed, Subject Minor, Not Present

JOURNAL ENTRIES

DEFENDANT'S MOTION TO ENFORCE, FOR AN ORDER TO SHOW CAUSE WHY PLAINTIFF SHOULD NOT BE HELD IN CONTEMPT OF COURT, FOR CLARIFICATION AND FOR ATTORNEY'S FEES AND COSTS...DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE...CASE MANAGEMENT CONFERENCE

Statements by Attorney Primas regarding Defendant's lack of effort to seek employment, therapy, request for drug test and a full custody evaluation. Argument by Attorney Schneider and statements regarding sale of residence and request for parties to complete the UNLV Co-Parenting agreement. Discussion regarding current and prior CPS involvement.

Following discussion, COURT ORDERED as follows:

1. Request for Child Protection Services Appearance and Records SIGNED and FILED IN OPEN COURT.
2. Defendant's request for an ORDER TO SHOW CAUSE is DENIED.
3. Plaintiff shall present himself to the American Toxicology Institute (ATI) for a FULL DRUG SCREEN by the end of the day today. ATI referral provided to Plaintiff IN OPEN COURT. Defendant shall be responsible for the cost of this test, subject to re-tax depending on results. RETURN HEARING set for 2/25/19 at 11:00 a.m.
4. Parties are to attend and complete the UNLV Co-Parenting Course.
5. All communication between the parties is to be appropriate and only related to the minor children.
6. The timeshare stated in the previous order as 3:00 p.m. is to be CORRECTED to 8:00 a.m. consistent with the Court's order.
7. Defendant's CHILD SUPPORT is to remain as previously set.

8. Plaintiff is to actively seek employment and supply proof that he is on the union work list by the end of this week.
9. Plaintiff is to continue to make the truck payment on-time and remain current.
10. Plaintiff to provide pictures of the completed house by Friday (1/25/19).
11. The martial residence is to be appraised. Defendant to front the cost of the appraisal, which will be subject to re-tax.

Attorney Primas to prepare the Order from today's hearing with Attorney Schneider to review and countersign.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Feb 25, 2019 11:00AM Return Hearing
Courtroom 03 Gentile, Denise L

DISTRICT COURTFamily Division
CLARK COUNTY, NEVADA**FILED IN OPEN COURT**January 22, 2019STEVEN D. GRIERSON
CLERK OF THE COURTBY: [Signature]

DEPUTY

CASE NO: D-18-568055-DDEPT. F**REQUEST FOR CHILD PROTECTION
SERVICES APPEARANCE AND RECORDS**Devin Reed

Plaintiff,

-VS-

Amanda Reed

Defendant.

Mother

Amanda Reed

(Mother's name)

Father

Devin Reed

(Father's name)

Child(ren)'s Name

Abby Reed

(Child's name)

Shawn Reed

(Child's name)

(Child's name)

(Child's name)

NOTICE TO APPEAR:

NOTICE to Appear to Caseworker

(Caseworker's name)



NOTICE to Appear to CPS Representative

This Notice is to be submitted to CPS at least 72 hours prior to court hearing, except in emergency situations.

NOTICE to Appear at Court Hearing:

Date _____

Time _____

Dept _____

Type of Hearing _____

Bring Records ☐ Yes ☐ No

NOTICE to Provide Records Only by

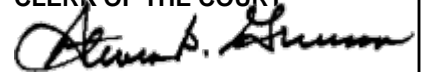
January 28, 2019

(Date)

Records to be delivered to: _____

Other Information _____

DATED this 22 day January 2019.[Signature]
FAMILY COURT JUDGE/HEARING MASTER



1 **LOUIS C. SCHNEIDER, ESQ.**
2 Nevada Bar Number: 009683
3 430 South 7th Street
4 Las Vegas, Nevada 89101
5 Ph: 702-435-2121
6 Fax: 702-431-3807
7 lcsllawllc@gmail.com
8 Attorney for the Plaintiff

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

9 **DEVIN REED,**

10 Plaintiff,

11 vs.

12 **AMANDA REED,**

13 Defendant.

Case Number:
Department:

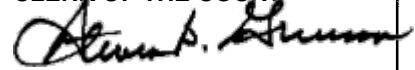
D-18-568055-D
F

14 **CERTIFICATE OF MAILING**

15 Pursuant to NRCP 5(b), I certify service of the foregoing PLAINTIFF'S MOTION TO DEEM
16 DEFENDANT A VEXATIOUS LITIGANT; FOR AND ORDER THAT DEFENDANT'S FATHER
17 STAY AWAY FROM PLAINTIFF PURSUANT TO THE BEHAVIOR ORDER; FOR RETURN
18 OF PERSONAL PROPERTY; FOR ATTORNEY'S FEES AND COSTS AND OTHER RELATED
19 MATTERS; PLAINTIFF'S EXHIBITS IN SUPPORT OF MOTION; and PLAINTIFF'S INITIAL
20 DISCLOSURES was made this 14th day of February, 2019, by depositing a true and correct copy
21 of same for first class mailing at Las Vegas, Nevada, postage fully prepaid thereon, addressed to the
22 following:

23 Carrie J. Primas, Esq.
24 1815 Village Center Circle, Ste. 140
25 Las Vegas, Nevada 89134
26 Attorney for Defendant

27 /s/ Brenda Hill
28 An employee of **LOUIS C. SCHNEIDER, LLC.**



1 **LOUIS C. SCHNEIDER, ESQ.**
2 Nevada Bar Number: 009683
3 430 South 7th Street
4 Las Vegas, Nevada 89101
5 Ph: 702-435-2121
6 Fax: 702-431-3807
7 lcsllawllc@gmail.com
8 Attorney for the Plaintiff

9
10 **EIGHTH JUDICIAL DISTRICT COURT**
11 **FAMILY DIVISION**
12 **CLARK COUNTY, NEVADA**

13 DEVIN REED,)		
)	Case Number:	D-18-568055-D
14 Plaintiff,)	Department:	F
)		
15 vs.)	Date of Hearing:	
)	Time of Hearing:	
16 AMANDA REED,)		
)		
17 Defendant.)		

18 **PLAINTIFF'S EXHIBITS IN SUPPORT OF MOTION**

19 COMES NOW the Plaintiff, DEVIN REED, by and through his attorney of record, LOUIS
20 C. SCHNEIDER, ESQ., and submits his Initial Disclosures pursuant to NRCP 16.2 attached as
21 follows:

- 22 EXHIBIT 1 Photo of the Out of Work list no longer posted due to member privacy;
23 EXHIBIT 2 Snap shot of the Family Wizard message from Defendant regarding the video;
24 EXHIBIT 3 Photos of the Christmas Card from Defendant sent to Plaintiff;
25 EXHIBIT 4 Police Contact Cards dated November 2, 2018 and June 18, 2018;
26 EXHIBIT 5 The list of belonging and items Plaintiff wishes to be awarded.

27 Dated this 14th day of February, 2019.

28 /s/ Louis C. Schneider
LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number: 009683

LOUIS C. SCHNEIDER, LLC.
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-430-2121

EXHIBIT 1

THE OUT OF WORK LIST WILL NO
LONGER BE POSTED DUE TO
MEMBER'S PRIVACY.

PLEASE ASK US AT THE WINDOW FOR YOUR
NUMBER ON THE LIST.

Resources Available

Take the first step towards getting help for drug and alcohol issues
while learning how to live a drug-free lifestyle. To contact us
about drug abuse please contact us. Please Call Toll Free 1-800-774-5796.

Answers to all alcohol, drug and other related problems is what
Feedback.com is all about. Our mission is to help you find the most effective, free, and sliding scale
resources.

EXHIBIT 2

12:46

LTE



View Message

From: Amanda Reed

To: Devin Reed

(First View: 01/31/2019 07:27 PM)

RE: Shawn drool/fever/eyes rolling/sick/

(Sent: 01/31/2019 07:04 PM)

My dad picked Shawn up at La's a few minutes after 3:00. You had taken Shawn out of your truck, I do see that you kissed his forehead (which to say you didn't feel he was hot? I question that.) you placed him on the ground, and when he walked toward my dad he took a few steps sideways almost like he was dizzy. I am watching the video and he was crying.

When my dad got to gymnastics, he told me Shawn felt hot to the touch. I felt him. He was definitely hot. We changed him into his tumble clothes and he was lethargic and just slumped over. I thought maybe he just needed a minute. We changed into soccer clothes and tried to go to soccer. He started shaking and telling me he hurt from his mouth to his feet, crying, his eyes started rolling back into his head. I got scared. My dad stayed with Abby while she was in gymnastics



APPX0234

12:47

LTE



View Message

started rolling back into his head. I got scared. My dad stayed with Abby while she was in gymnastics class and I took Shawn to the doctor. Shawn did have a fever. They asked me to ask you if you noticed these symptoms or shared any concerns with me. You read my message but did not respond.

My dad met me to drop Abby off to me...

He has strep throat.

I panicked and had him look at Abby. Abby was not complaining of anything and did not look sick, but since Shawn has strep throat I asked if he could look at Abby since we were there and if there were signs I'd check her in too. He checked her and said she did not need to be seen because she was healthy and had no signs of being sick. He has antibiotics.

You stated Abby was not bubbly and therefore she needed to be kept from school. Shawn left your truck looking sick and crying, but you stated he was fine.



APPX0235

12:47

LTE



View Message

he was fine.

I will submit his scripts for reimbursement

On 01/31/2019 05:41 PM Devin Reed wrote:

He did not have a fever when i had him i kissed his forehead when I dropped him off . He was not crying nor in pain . He was drooling when he sleeping/He napped a lot with abby while she was sick yesterday.Im not sure what are you trying to get

On 01/31/2019 04:54 PM Amanda Reed wrote:

So you noticed he was drooling/is hot/his eyes rolling back in his head?

On 01/31/2019 04:50 PM Devin Reed wrote:

I think his molar teeth are coming in

He had plenty of sleep. So did Abby



APPX0236

12:47 1

LTE



View Message

sick yesterday. Im not sure what are you trying to get

On 01/31/2019 04:54 PM Amanda Reed wrote:

So you noticed he was drooling/is hot/his eyes rolling back in his head?

On 01/31/2019 04:50 PM Devin Reed wrote:

I think his molar teeth are coming in

He had plenty of sleep . So did Abby.

On 01/31/2019 04:48 PM Amanda Reed wrote:

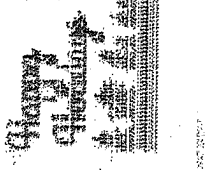
Shawn is drooling big piles of drool. He is crying because his "mouth hurts all the way to his feet." His eyes are rolling backward. He's tired and lethargic acting. He feels hot. Did you notice any of this?



APPX0237

EXHIBIT 3

LAS VEGAS NV 890
15 DEC 2015 PM 4 L



Devin Reed
9425 La Madre
Las Vegas, NV
89149

89149-250625

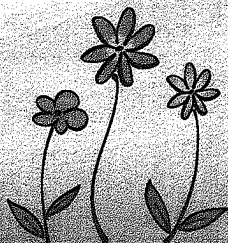


LAS VEGAS NV 890
15 DEC 2015 PM 4:1

evin Reed
S La Madre
995- NV
89149

Ad

Thinking
of You
Today



dad

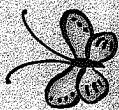
Worlds worst father

whos kids all

hate him!

You SCARE

US

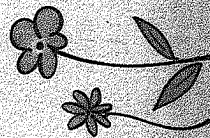
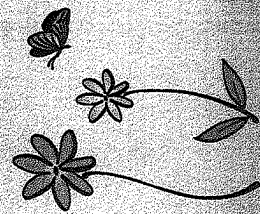


Hope ~~ugly~~ thoughts

Flutter around you today,

bringing you ~~out~~ unhappiness

and reasons to ~~think~~ think



I do

EXHIBIT 4

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



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

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

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

Address

9425 W. LAMADRE

Event #

LLU181100007817

Apt. Name

Message

WELFARE CHECK

ON CALL REQUESTED BY P/R
CHILDREN CODED

POLICE CONTACT CARD

Date

Time

Officer Name

P#

11/2/18

2030

A. BROWNE

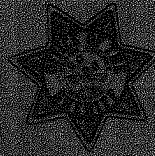
13756

LVMPD 275 (REV. 10-14)

DISTRIBUTION: WHITE • SUBSTATION CARDSTOCK • CITIZEN



NOTICE
SEE OTHER SIDE



SHERIFF'S CIVIL PROCESS SECTION
301 E. CLARK AVE., #100
LAS VEGAS, NV 89101
(702) 455-5400

Please contact the Deputy at the number listed on the back of this card,
or call our office at the number above, to **leave a message**
between the following hours:

8:00 A.M. to 4:45 P.M. Monday through Friday

Our office is closed for lunch daily from 12 P.M. – 1 P.M.

SHERIFF JOSEPH M. LOMBARDO – CLARK COUNTY SHERIFF
SHERIFF'S CIVIL PROCESS SECTION

REV. 04-11

MESSAGE

DATE 06/19/15

TIME 1205

NAME DEVIN BOED

CASE#

PLEASE CALL:

D. PEARSON

DEPUTY SHERIFF

702-455-7076

YOU MAY ALSO MAKE ARRANGEMENTS TO PICK UP YOUR CASE FROM OUR OFFICE

DEPUTY SHERIFF

PHONE#

EXHIBIT 5

Half of House itemized
Things I want want (this would be half)

Items in Garage

Home depot Shelves 10
racks
My brothers Apple laptop silver MacBook
Pro \$1200
Swamp cooler on wheels \$600
Blower \$100
Shop vac \$100
Rakes my big silver shovel shovels brooms
\$200
Battery powered weed trimmer \$200
Office walls partitions
Laundry
Master Bedroom
Mattress bed
Dresser bed set
Sony led tv 53"
Sound system for tv bar and sub
Abby's pink car bed and mattress
Closet in bedroom
memorabilia helmet Slayer
Moss-berg 12 gauge shotgun cruiser
.38 smith and Wesson hand gun
Living room
Red couch set
Brown recliner
Tv 57" lg led
Tv stand
Lamps
house Plant I've had prior to marriage
Sony sound bar \$350
Princess castle from costco (Abbys i
WANT THIS BACK) \$900
Bookshelf \$100
Candle wall \$400
Dvd collection 200+ dvds
Brown couches \$2000
Matching Ottoman footrest \$400
Snow gear in closet \$2000
Camera gear in closet and shed
Kitchen
Pub style solid oak table +8 chairs I bought

prior to marriage \$3700
Breville juicer
Keurig coffee maker
Plates /dishes
Rice cooker
Bread maker
Ninja blender
Abby's bedroom
White oak bunk beds+mattresses
White dresser I made
Decorations /shelves
Clothes 1/2 of them I purchased
Battery kids cars 2
Shawn's bedroom
Bed plus mattress
Back yard
Big Toy house for yard
Patio furniture
Stainless steel refrigerator for back yard

Pool tools
32" tv on wall mount