

IN THE SUPREME COURT OF THE STATE OF NEVADA

AMANDA REED,

Appellant,

vs.

DEVIN REED,

Respondent.

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Jan 10 2022 10:37 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court  
CASE NO. 83514  
District Court Case No:  
D-14-499144-D

**APPELLANT'S APPENDIX - VOL II**

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26	of Personal Property; for			
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	and Countermotion for			
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26	Modification of Custody;			
27	to Continue Trial; and			
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9	Plaintiff Should Not Be			
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15				
16				
17	Order Setting Civil Non-Jury Trial (Child Custody/Paternity/ Visitation/Relocation)	8.5.2020	IV	APPX0977 - APPX0982
18				
19	Order Shortening Time	8.20.2019	III	APPX0566
20	Order to Seal Records Pursuant to NRS 125.110(2)	5.26.2021	VI	APPX1254 - APPX1256
21				
22	Plaintiff's Amended Pre- Trial Memorandum	8.22.2019	III	APPX0567 - APPX0571
23				
24	Plaintiff's Exhibits In Support of Motion	2.14.2019	I	APPX0230 - APPX0248
25				
26				
27				



1	Plaintiff's Motion to Deem Defendant a Vexatious Litigant; for an Order that Defendant's Father Stay Away From Plaintiff Pursuant to the Behavior Order; for Return of Personal Property; for Attorney's Fees and Costs and Other Related Matters	2.14.2019	II	APPX0249 - APPX0254
6	Plaintiff's Opposition and Countermotion	8.12.2020	V	APPX0987 - APPX0993
8	Plaintiff's Opposition and Countermotion for Revised Custodial Timeshare, School Placement, to Resolve Parent-Child Matters, and for Attorney Fees and Costs	4.1.2021	V	APPX1191 - APPX1210
11	Plaintiff's Pre-Trial Memorandum	6.10.2019	II	APPX0430 - APPX0432
13	Plaintiff's Pre-Trial Memorandum	2.18.2021	V	APPX1156 - APPX1169
14	Plaintiff's Supplemental Exhibit In Support of Motion	2.14.2019	II	APPX0255 - APPX0257
16	Plaintiff's Supplemental Plea for Relief	7.2.2020	IV	APPX0924 - APPX0949
18	Receipt of Copy	6.21.2018	I	APPX0056
19	Receipt of Copy	5.13.2019	II	APPX0419
20	Receipt of Copy	8.22.2019	III	APPX0567
21	Receipt of Copy	2.22.2021	V	APPX1171
22	Re-Notice of Motion	9.28.2020	V	APPX1109
23	Reply to Opposition and Countermotion	3.19.2019	II	APPX0406 - APPX0409
24	...			
25	...			
26	...			
27				

1	Reply to Plaintiff's	8.22.2019	III	APPX0572 -
2	Opposition to Motion for			APPX0580
3	an Order to Show Cause			
4	Why Plaintiff Should			
5	Not Be Held In Contempt			
6	of Court; for Leave to			
7	Amend Counterclaim; for			
8	a Modification of Custody;			
9	to Continue Trial; and			
10	for Attorney Fees and			
11	Costs; and Opposition to			
12	Plaintiff's Countermotion			
13	for Attorney's Fees and			
14	Costs, and for Related			
15	Relief			
16	Reply to Plaintiff's	4.23.2021	VI	APPX1231 -
17	Opposition to Motion for			APPX1245
18	Reconsideration of the			
19	Court's Order from the			
20	February 25, 2021 Hearing;			
21	and Opposition to Plaintiff's			
22	Countermotion for Revised			
23	Custodial Timeshare,			
24	School Placement, to Resolve			
25	Parent-Child Matters, and			
26	for Attorney Fees and			
27	Costs			
28	Reply to Plaintiff's	5.7.2020	IV	APPX0815 -
29	Opposition to Motion to			APPX0832
30	Adopt Dr. Paglini's			
31	Recommendation; for an			
32	Order to Show Cause Why			
33	Plaintiff Should Not Be			
34	Held In Contempt of Court;			
35	to Modify Custody; and for			
36	Attorney Fees and Costs;			
37	and Opposition to Plaintiff's			
38	Countermotion for			
39	Protective Order On Behalf			
40	of the Parties' Minor Children;			
41	for an Order Sealing Case			
42	File; for an Order Requiring			
43	Defendant to Obtain Court			
44	Approval Prior to Filing			
45	Future Motions; to Declare			
46	Defendant a Vexatious			
47	Litigant; for Sanctions, Fees,			
48	and Costs; and for Related			
49	Relief			

1	Request for Child Protection Services Appearance and Records	1.22.2019	I	APPX0228
2				
3	Request for Issuance of Joint Preliminary Injunction	3.20.2018	I	APPX0006
4	Stipulation and Order for Custody Evaluation	9.19.2019	III	APPX0590 - APPX0591
5				
6	Stipulation and Order for Release of CPS Records	1.23.2020	III	APPX0605 - APPX0607
7	Stipulation and Order Regarding Child Support Arrears and Child Support	6.17.2021	VI	APPX1269 - APPX1271
8				
9	Stipulation and Order to Continue Hearing	12.10.2019	III	APPX0601 - APPX0602
10				
11	Stipulation and Order to Continue June 26, 2018 Hearing	6.28.2018	I	APPX0105 - APPX0106
12				
13	Stipulation and Order to Continue Order to Show Cause Hearing	7.30.2020	IV	APPX0967 - APPX0969
14				
15	Stipulation and Order to Continue Trial	10.01.2020	V	APPX1116 - APPX1118
16	Supplement to Defendant's Motion for an Order to Show Cause Why Plaintiff Should Not Be Held In Contempt of Court; for Leave to Amend Counterclaim; for a Modification of Custody; to Continue Trial; and for Attorney Fees and Costs	8.22.2019	III	APPX0582 - APPX0587
17				
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21	Supplement to 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 Fees and Costs	1.11.2019	I	APPX0199 - APPX0222
22				
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27				

1	Supplement to Defendant's	3.18.2019	II	APPX0400 -
2	Opposition to Plaintiff's			APPX0405
3	Motion to Dem Defendant A			
4	Vexatious Litigant; for an			
5	Order that Defendant's Father			
6	Stay Away from Plaintiff			
7	Pursuant to the Behavior			
8	Order; for Return of Personal			
9	Property; for Attorney's			
10	Fees and Costs and Other			
11	Related Matters; and			
12	Countermotion for Joint Legal			
13	and Primary Physical Custody			
14	of the Minor Children,			
15	Child Custody Evaluation,			
16	Child Support, Exclusive			
17	Possession, and for Attorney			
18	Fees and Costs			
19	Supplemental Certificate of	4.13.2020	IV	APPX0769
20	Service			
21	Transcript Re: All Pending	12.15.2021	VI	APPX1343 -
22	Motions			APPX1365
23	Transcript Re: All Pending	12.15.2021	VI	APPX1366 -
24	Motions			APPX1397
25	Transcript Re: All Pending	12.15.2021	VI	APPX1398 -
26	Motions			APPX1436
27	Transcript Re: All Pending	12.15.2021	VII	APPX1510-
28	Motions			APPX1548
29	Transcript Re: Non-Jury	12.15.2021	VII	APPX1437-
30	Trial			APPX1509
31	...			
32	...			
33	...			
34	...			
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**AFFIRMATION**

(Pursuant to NRS 239B.030)

The undersigned does hereby affirm that the preceding documents  
filed in the above-referenced matter does not contain the social security number  
of any person.

DATED this 10 day of January, 2022.

**KAINEN LAW GROUP, PLLC**

By: /s Racheal H. Mastel  
**RACHEAL H. MASTEL, ESQ.**  
Nevada Bar No. 11646  
Attorneys for Appellant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10 day of January, 2022, I caused to be served the *Appellant's Appendix - Vol II* to all interested parties as follows:

\_\_\_ BY MAIL: Pursuant to NRCP 5(b), I caused a true copy thereof to be placed in the U.S. Mail, enclosed in a sealed envelope, postage fully prepaid thereon, addressed as follows:

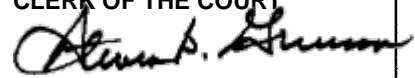
\_\_\_ BY CERTIFIED MAIL: I caused a true copy thereof to be placed in the U.S. Mail, enclosed in a sealed envelope, certified mail, return receipt requested, postage fully paid thereon, addressed as follows:

\_\_\_ BY FACSIMILE: Pursuant to EDCR 7.26, I caused a true copy thereof to be transmitted, via facsimile, to the following number(s):

X BY ELECTRONIC MAIL: Pursuant to EDCR 7.26 and NEFCR Rule 9, I caused a true copy thereof to be served via electronic mail, via Wiznet, to the following e-mail address(es):

Michancy Cramer  
Alex Ghibaud

\_\_\_\_\_  
/s Racheal H. Mastel  
An Employee of  
KAINEN LAW GROUP, PLLC



LOUIS C. SCHNEIDER, ESQ.  
Nevada Bar Number: 009683  
430 South 7th Street  
Las Vegas, Nevada 89101  
Ph: 702-435-2121  
Fax: 702-431-3807  
lcslawllc@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
	)	Department:	F
Plaintiff,	)		
	)		
vs.	)	Date of Hearing:	20th March 2019
	)	Time of Hearing:	10:00 Am
AMANDA REED,	)		
	)		
Defendant.	)	ORAL ARGUMENT REQUESTED:	YES

**PLAINTIFF'S MOTION TO DEEM DEFENDANT A VEXATIOUS LITIGANT; FOR  
AND ORDER THAT DEFENDANT'S FATHER STAY AWAY FROM PLAINTIFF  
PURSUANT TO THE BEHAVIOR ORDER; FOR RETURN OF PERSONAL  
PROPERTY; FOR ATTORNEY'S FEES AND COSTS AND OTHER RELATED  
MATTERS**

COMES NOW Defendant, DEVIN REED, by and through his attorney, LOUIS C. SCHNEIDER, ESQ., and files his Motion for the following relief. This Motion 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. For an order to deem Defendant a Vexatious Litigant;
2. For an order directing Defendant's Father Michael Spielberg to stay away from Plaintiff;
3. For an order allowing Plaintiff to retrieve his personal property and specific items;
4. That the Court also award the Defendant reasonable attorney fees.

DATED this 13<sup>th</sup> day of February, 2019.

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


NOTICE OF MOTION

TO: AMANDA REED, Defendant herein; and

TO: CARRIE J. PRIMAS, ESQ.; Attorney for Defendant:

**YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE** that the undersigned will bring the foregoing Motion on for hearing before the above-entitled court on the 20th March 2019 10:00 Am, in Department f of said Court.

**DATED** this 13<sup>th</sup> day of February, 2019.

  
**LOUIS C. SCHNEIDER, ESQ.**  
Nevada Bar Number: 009683

**I. STATEMENT OF FACT**

Plaintiff and Defendant were married on or before October 2, 2008. The parties have two minor children to-wit: Abby Reed, born April 6, 2013; and Shawn Reed, born July 3, 2015. Plaintiff filed for his Complaint for Divorce on March 20, 2018 and Defendant filed her Answer and Counterclaim April 10, 2018. Since filing for divorce, Plaintiff has endured constant harassment by Defendant and her father, Michael Spielberg. Defendant has called the Police and CPS on numerous occasions with fruitless claims of violent behavior or mistreatment of the children and has had her father stalk and follow Plaintiff.

After filing for divorce, Plaintiff has had a turbulent relationship with not only with the Defendant but with her father as well. Defendant contacted Plaintiff's employer causing him to become unemployed then is upset he is out of work. While Plaintiff is expected to maintain his obligations during the pendency of this action it appears Defendant is excused from cooperating and maintaining her obligations. She also shut off Plaintiff's cell phone causing him to lose his a large majority of his contact's, including his work contact. Even after being asked numerous times to release the number Defendant refused. Plaintiff had to obtain a new phone number and start over.

In effort to control and micro-manage Plaintiff, Defendant's father, Michael Spielberg has been following Plaintiff and even has her father take pictures of the "Out of Work List" at the Union Hall causing the list to no longer be posted for member privacy. Please see attached the Out of Work



list as **EXHIBIT 1**. Mr. Spielberg not only follows Plaintiff, but also confronts Plaintiff while he is attempting to drop off his daughter to school, harassing Plaintiff stating “he’s not going anywhere”. This has caused an issue with Plaintiff and the school since Defendant works at Abby’s school. The children’s school should be a neutral zone for both parties. Mr. Spielberg has even pulled a gun out on Plaintiff threatening to shoot Plaintiff. The Police were called to the parties home to ensure nothing happened. The Plaintiff believe that the Defendant hid the gun before the Police arrived to avoid her father going to jail. With the conflict of the parties, Defendant’s father should have never been present at the home with a hand gun.

Plaintiff is well aware that Defendant’s father will be involved in the children’s lives but that does not extend to Plaintiff and *his* time with the children. Defendant and her father fail to understand that Plaintiff is an active father and will be forever involved in his children’s lives. Plaintiff should be allowed to pick up and drop off their children without incident. Please see attached the Family Wizard message from Defendant wherein she states she is “watching the video” of Plaintiff dropping off his son as **EXHIBIT 2**. Defendant not only slams the Plaintiff for his inability to diagnose the minor children but also grooming the situation to suggest that the Plaintiff is incapable of properly caring for their children. When Plaintiff does not response, Defendant continues to berate Plaintiff insinuating he is inadequate. It is Plaintiff’s understanding that Defendant has taken the children to the Doctor’s office numerous times since filing for divorce, fishing to find anything to use against Plaintiff. To further prove Defendant’s anger towards Plaintiff and vindictive behavior, please see attached the *horrible* Christmas card sent by Defendant to Plaintiff as **EXHIBIT 3**.

## **II. POINTS AND AUTHORITIES**

Pursuant to NRS 155.165 the Court has the discretion in this case to admonish the Defendant and deem her a vexatious litigant in effort to limit her harassment of Plaintiff.

Finding of vexatious litigant; sanctions; standing of interested party and vexatious litigant under certain circumstances.

1. The court may find that a person, including, without limitation, a personal representative or trustee, is a vexatious litigant if the person files a petition, objection, motion or other pleading which is without merit, intended to harass or annoy the personal representative or a trustee or intended to unreasonably oppose or frustrate the efforts of an interested person who is acting in good faith to enforce his or her rights. The court may find that a personal representative or trustee is a

1 vexatious litigant if the personal representative or trustee has expended the funds of  
2 the estate or trust to unreasonably oppose the good faith efforts of an interested  
3 person to enforce his or her rights. In determining whether the person is a vexatious  
4 litigant, the court may take into consideration whether the person has previously filed  
5 pleadings in a proceeding that were without merit, intended to harass or annoy a  
6 fiduciary or intended to unreasonably oppose or frustrate the efforts of an interested  
7 person who is acting in good faith to enforce his or her rights.

8 2. If a court finds that a person is a vexatious litigant pursuant to subsection 1,  
9 the court may impose sanctions on the person in an amount sufficient to reimburse  
10 the estate or trust for all or part of the expenses, including, without limitation,  
11 reasonable attorney's fees, incurred by the estate or trust to respond to the petition,  
12 objection, motion or other pleading and for any other pecuniary losses which are  
13 associated with the actions of the vexatious litigant. If a court finds that a personal  
14 representative or trustee is a vexatious litigant, the court may remove the personal  
15 representative or trustee and any sanctions imposed by the court must be imposed  
16 against the personal representative or trustee personally and not against the estate or  
17 trust. The court may make an order directing entry of judgment for the amount of  
18 such sanctions.

19 3. The court may deny standing to an interested party to bring a petition or  
20 motion if the court finds that: (a) The subject matter of the petition or motion is  
21 unrelated to the interests of the interested party; (b) The interests of the interested  
22 party are minimal as it relates to the subject matter of the petition or motion; or (c)  
23 The interested party is a vexatious litigant pursuant to subsection 1.

24 4. If a court finds that a person is a vexatious litigant pursuant to subsection 1,  
25 that person does not have standing to: (a) Object to the issuance of letters; or (b)  
26 Request the removal of a personal representative or a trustee.

27 Plaintiff states that Defendant has contacted Police several times to do a supposed "well  
28 check" knowing the children are fine. Please see attached the Police Contact Cards attached as  
29 **EXHIBIT 4**. She has made false claims degrading Plaintiff and his living arraignments and parenting  
30 skills assuming she is the better parent. Defendant has also made several false reports to CPS as well  
31 in attempt to gain an advantage in Court. Counsel for the parties have had an opportunity to review  
32 the CPS records and it was found that Defendant has been coaching the children as what to say and  
33 her claims were unsubstantiated.

34 The false accusations continue with Defendant claiming Plaintiff is a drug addict and has had  
35 him drug tested a with each test, Plaintiff is clean. Defendant also has her father stalk Plaintiff  
36 constantly and video recording Plaintiff. Since Defendant's father threatened Plaintiff with a gun,  
37 Plaintiff has been worried for his safety.

38 While the Court issued a Mutual Behavior Order for the parties to follow the Defendant feels  
39 she found a loop hole by having her father do her dirty work. Plaintiff loves his children but  
40 Defendant's micro-management is just another example of her harassment. When Defendant is not

1 able to control the Plaintiff she contacts her attorney inflating the costs of the ongoing litigation.

2 In addition, due to the conflict of the parties, Plaintiff has yet to collect all of his belonging  
3 and has submitted a list of items he wishes to be awarded. Please see the Plaintiff's list attached as

4 **EXHIBIT 5.**

5 **III. ATTORNEY'S FEES**

6 NRS 18.010 refers to an award of attorney's fees based upon the following:

7 1. The compensation of an attorney and counselor for his or her services is  
8 governed by agreement, express or implied, which is not restrained by law.

9 2. In addition to the cases where an allowance is authorized by specific  
10 statute, the court may make an allowance of attorney's fees to a prevailing party:

11 (a) When the prevailing party has not recovered more than \$20,000; or

12 (b) Without regard to the recovery sought, when the court finds that the claim,  
13 counterclaim, cross-claim or third-party complaint or defense of the opposing party  
14 was brought or maintained without reasonable ground or to harass the prevailing  
15 party. The court shall liberally construe the provisions of this paragraph in favor of  
16 awarding attorney's fees in all appropriate situations. It is the intent of the Legislature  
17 that the court award attorney's fees pursuant to this paragraph and impose sanctions  
18 pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all appropriate  
19 situations to punish for and deter frivolous or vexatious claims and defenses because  
20 such claims and defenses overburden limited judicial resources, hinder the timely  
21 resolution of meritorious claims and increase the costs of engaging in business and  
22 providing professional services to the public.

23 3. In awarding attorney's fees, the court may pronounce its decision on the  
24 fees at the conclusion of the trial or special proceeding without written motion and  
25 with or without presentation of additional evidence.

26 4. Subsections 2 and 3 do not apply to any action arising out of a written  
27 instrument or agreement which entitles the prevailing party to an award of reasonable  
28 attorney's fees.

19 Plaintiff should not have to endure the constant threats or vindictive harassment perpetuated  
20 by the Defendant and her father, Michael Spielberg. The false accusations of drug abuse when  
21 Plaintiff has tested clean each time, contacting CPS needlessly with her claims found to be  
22 unsubstantiated and calling the Police, and Defendant's vindictive behavior has caused Plaintiff to  
23 expended unnecessary funds to address and response to these claims and therefore should be awarded  
24 attorney's fee.

25 DATED this 13 day of February, 2019.

26 

27 **LOUIS C. SCHNEIDER, ESQ.**  
28 Nevada Bar Number: 009683

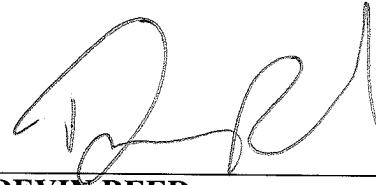
LOUIS C. SCHNEIDER, LLC.  
430 South 7th Street  
Las Vegas, Nevada 89101  
Ph: 702-430-2121

**AFFIDAVIT OF PLAINTIFF IN SUPPORT OF MOTION**

STATE OF NEVADA       )  
                                  )  
COUNTY OF CLARK     )       SS:

**DEVIN REED**, being first duly sworn, deposes and says:

That he is the Plaintiff herein; that he has read the foregoing Motion, and the same is true of his own knowledge, except for those matters which are therein stated upon information and belief, and as to those matters, he believes them to be true.

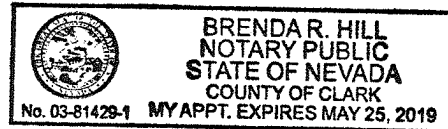


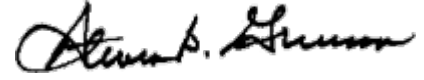
**DEVIN REED**

**SUBSCRIBED** and **SWORN TO** before me  
this 13<sup>th</sup> day of February, 2019.



**NOTARY PUBLIC** in and for  
said County and State





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, )  
14 )  
15 Plaintiff, ) Case Number: D-18-568055-D  
16 ) Department: F  
17 vs. )  
18 )  
19 AMANDA REED, )  
20 )  
21 Defendant. )

22 **PLAINTIFF'S SUPPLEMENTAL EXHIBIT IN SUPPORT OF MOTION**

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

26 EXHIBIT 6 Las Vegas Metropolitan Police Department Welfare Check card dated  
27 February 14, 2019.

28 Dated this 19th day of February, 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

# **EXHIBIT 6**

# LAS VEGAS METROPOLITAN POLICE DEPARTMENT



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

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

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stare-down

**X WEAPONS CHECK**

Address

9425 LA MADRE

Event #

190200061790

Apt. Name

Message

PR = AMANDA REED-CALLED

FOR LVMPD TO CHECK ON SHAWN REED, 3 YRS +  
 ABIGAIL REED, 5 YRS. FATHER WAS COOPERATIVE FOR  
 FINE, HOUSE CLEAN, FRESH FOOD, MISSED SCHOOL = ILL

Date

2/14/19

Time

1015

Officer Name

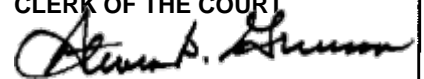
MARTIN/PRK

P#

5000 / 15354

LVMPD 276 (REV. 10-14)

DISTRIBUTION: WHITE - SUBSTATION CARPENTRY - CITIZEN



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,**

14 Plaintiff,

15 vs.

16 **AMANDA REED,**

17 Defendant.

Case Number:  
Department:

D-18-568055-D  
F

18 **CERTIFICATE OF MAILING**

19 Pursuant to NRCP 5(b), I certify service of the foregoing PLAINTIFF'S SUPPLEMENTAL  
20 EXHIBIT IN SUPPORT OF MOTION was made this 15<sup>th</sup> day of February, 2019, by depositing  
21 a true and correct copy of same for first class mailing at Las Vegas, Nevada, postage fully prepaid  
22 thereon, addressed to the 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.**



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint****COURT MINUTES**

February 19, 2019

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

**February 19, 2019      10:00 AM      Minute Order**

**HEARD BY:**    Gentile, Denise L**COURTROOM:**    Chambers**COURT CLERK:**    Melissa McCulloch**PARTIES:**

Abby Reed, Subject Minor, not present	Harvey Gruber, Attorney, not present
Amanda Reed, Defendant, Counter Claimant, not present	Carrie Primas, Attorney, not present
Devin Reed, Plaintiff, Counter Defendant, not present	Louis Schneider, Attorney, not present
Shawn Reed, Subject Minor, not present	

<b>JOURNAL ENTRIES</b>
------------------------

- NRCP 1 and EDCR 1.10 state the procedure in district courts shall be administered to secure efficient, speedy, and inexpensive determinations in every action.

COURT FINDS a status check for this case is currently scheduled on February 25, 2019 at 11:00 a.m. COURT FINDS Plaintiff filed a Motion to Deem Defendant a Vexatious Litigant; for an Order that Defendant's Father Stay Away from Plaintiff Pursuant to the Behavior Order; for Return of Personal Property; for Attorney's Fees and Costs and other Related Matters on February 14, 2019. COURT FINDS Plaintiff's Motion is currently scheduled to be heard on March 20, 2019 at 10:00 a.m.

In the interest of judicial economy, COURT ORDERS the status check currently scheduled on February 25, 2019 shall be CONSOLIDATED and heard together with the Motion hearing on March 20, 2019 at 10:00 a.m.

PRINT DATE:	02/19/2019	Page 1 of 2	Minutes Date:	February 19, 2019
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

APPX0259

CLERK'S NOTE: On 2/19/19 a copy of the Court's Minute Order was placed in each Attorney's folder located in the Clerk's Office. (mm)

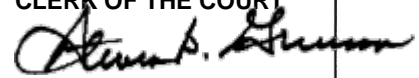
**FUTURE HEARINGS:**     March 20, 2019 10:00 AM Return Hearing  
Gentile, Denise L  
Courtroom 03  
Slayton, Andrea

March 20, 2019 10:00 AM Motion  
Gentile, Denise L  
Courtroom 03  
Slayton, Andrea

PRINT DATE:	02/19/2019	Page 2 of 2	Minutes Date:	February 19, 2019
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APPX0260



1 **ORDR**

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10 Attorneys for Defendant, Amanda Reed

11 **DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 DEVIN REED,

14 Plaintiff,

15 v.

16 AMANDA REED,

17 Defendant.

) Case No: D-18-568055-D

) Dept No: F

18 **ORDER AFTER HEARING**

19 Date of Hearing: October 16, 2018

20 Time of Hearing: 11:00 a.m.

21 This matter having come before this Court on the 16<sup>th</sup> day of October, 2018, for a Case  
22 Management Conference and return hearing from FMC Mediation. Plaintiff, Devin Reed, being  
23 present and represented by Louis C. Schneider, Esq., and Defendant, Amanda Reed, being present  
24 and represented by Carrie J. Primas, Esq., of Hanratty Law Group, the Court hereby finds and  
25 orders as follows:

26 THE COURT FINDS that the parties have reached an agreement and the agreement is to  
27 clarify the terms of the temporary Order and convert them to permanent orders.

28 IT IS HEREBY STIPULATED AND ORDERED that the parental timeshare shall remain  
status quo, specifically as follows: in Week One, Plaintiff will have the minor children from  
Tuesday at school drop off, or 8:00 a.m. at the babysitter if there is no school, until Thursday at  
school pick up, or 3:00 p.m. at the babysitter if there is no school, and in Week Two Plaintiff will  
have the children from Friday at school drop off, or 8:00 a.m. at the babysitter if there is no  
school, until Monday at school drop off, or 8:00 a.m. at the babysitter if there is no school. The  
delivering parent shall transport and all exchanges shall take place at the babysitter or the minor

1 child's school. As to Shawn, until he is in school, all exchanges related to him shall occur at the  
2 babysitter.

3 IT IS FURTHER STIPULATED AND ORDERED Plaintiff's ex-wife shall not watch or  
4 transport the minor child. Devon's adult son, Daniel, shall be allowed to transport the minor  
5 children.

6 IT IS FURTHER STIPULATED AND ORDERED that the parties shall follow and abide  
7 by the previous holiday schedule implemented in the Partial Parenting Agreement, which is  
8 attached to this Order as Exhibit A; however, this schedule does not address Christmas. As such,  
9 Winter Break shall be divided as follows: Defendant shall have Christmas Day at 8:00 a.m. until  
10 December 31<sup>st</sup> at 5:00 p.m. in even years, and Christmas day at 8:00 a.m. until January 1<sup>st</sup> at 5:00  
11 p.m. in odd years. Plaintiff shall have the remainder of Winter Break.

12 IT IS FURTHER STIPULATED AND ORDERED that there shall be no right of first  
13 refusal.

14 IT IS FURTHER STIPULATED AND ORDERED that the parties shall abide by the  
15 Mutual Behavior Order filed on August 14, 2018, and said Order is extended to the minor  
16 children's events and any third-party or family members of the parties.

17 IT IS FURTHER STIPULATED AND ORDERED that the parties shall be responsible for  
18 transporting the minor children to all extracurricular activities during their parental timeshare.

19 IT IS FURTHER STIPULATED AND ORDERED that Plaintiff shall not smoke in the  
20 car or house during his parental timeshare.

21 IT IS FURTHER STIPULATED AND ORDERED that Defendant shall have two weeks  
22 to return the marital dog, Chiba, to Plaintiff; however, if the Defendant has not taken holiday  
23 pictures with the dog and children by that time; the minor children shall be allowed to take the  
24 dog during their visitation with Defendant for family pictures and return the dog to Plaintiff.

25 IT IS FURTHER STIPULATED AND ORDERED that Plaintiff shall continue to  
26 maintain the truck payment. Plaintiff shall be responsible for car insurance. Defendant shall be  
27

1 responsible for the cell phone.

2 IT IS FURTHER STIPULATED AND ORDERED that Plaintiff's child support  
3 obligation shall be waived until he establishes employment.

4 IT IS FURTHER STIPULATED AND ORDERED that Defendant shall have temporary  
5 exclusive possession of the marital residence; however, Plaintiff is not waiving any rights or  
6 interest to the equity in the residence. Counsel will discuss regarding the appraisal of the marital  
7 residence.

8 IT IS FURTHER ORDERED that the foregoing agreement is affirmed and adopted by this  
9 Court.

10 IT IS FURTHER ORDERED that the Case Management Conference shall be continued to  
11 December 18, 2018 at 11:00 a.m.

12 IT IS FURTHER ORDERED that Attorney Primas shall prepare the Order from today's  
13 hearing and Attorney Schneider to countersign.

14 IT IS FURTHER ORDERED AND THE PARTIES ARE PUT ON NOTICE that they are  
15 subject to the requirements of NRS 125C.0045(6) and NRS 125C.0045(7.)

16 **PENALTY FOR VIOLATION OF ORDER:** THE ABDUCTION, CONCEALMENT  
17 OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A  
18 CATEGORY D FELONY AS PROVIDED IN NRS 193.190. NRS 200.359 provides that every  
19 person having a limited right of custody to a child or any parent having no right of custody to the  
20 child who willfully detains, conceals or removes the child from a parent, guardian or other person  
21 having lawful custody or a right of visitation of the child in violation of an order of this court, or  
22 removes the child from jurisdiction of the court without the consent of either the court or all  
23 persons who have the right to custody or visitation is subject to being punished for a category D  
24 felony as provided in NRS 193.130.

25 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of October 25,  
26 1980, adopted by the 14th Session of the Hague Conference on Private International Law apply if  
27

1 a parent abducts or wrongfully retains a child in a foreign country. The minor children are  
2 habitual residents of Clark County, Nevada.

3 The parties are also placed on notice of the following provisions in NRS 125C.0045(8):

4 If a parent of the child lives in a foreign country or has significant commitments in a  
5 foreign country:

6 (a) The parties may agree, and the court shall include in the order for custody of the  
7 child, that the United States is the country of habitual residence of the child for the purposes of  
8 applying the terms of the Hague Convention as set forth in subsection 7.

9 (b) Upon motion of one of the parties, the court may order the parent to post a bond if  
10 the court determines that the parent poses an imminent risk of wrongfully removing or concealing  
11 the child outside the country of habitual residence. The bond must be in an amount determined by  
12 the court and may be used only to pay for the cost of locating the child and returning the child to  
13 his or her habitual residence if the child is wrongfully removed from or concealed outside the  
14 country of habitual residence. The fact that a parent has significant commitments in a foreign  
15 country does not create a presumption that the parent poses an imminent risk of wrongfully  
16 removing or concealing the child.

17 The parties are also placed on notice of the following provisions in NRS 125C.006:

18 1. If primary physical custody has been established pursuant to an order, judgment or  
19 decree of a court and the custodial parent intends to relocate his or her residence to a place  
20 outside of this State or to a place within this State that is at such a distance that would  
21 substantially impair the ability of the other parent to maintain a meaningful relationship with the  
22 child, and the custodial parent desires to take the child with him or her, the custodial parent shall,  
23 before relocating:

24 (a) Attempt to obtain the written consent of the noncustodial parent to relocate with  
25 the child; and  
26

1 (b) If the noncustodial parent refuses to give that consent, petition the court for  
2 permission to relocate with the child;

3 2. The court may award reasonable attorney's fees and costs to the relocating parent if the  
4 court finds that the noncustodial parent refused to consent to the relocating parent's relocation  
5 with the child:

6 (a) Without having reasonable grounds for such refusal; or

7 (b) For the purposes of harassing the custodial parent.

8 3. A parent who relocates with a child pursuant to this section without the written consent  
9 of the noncustodial parent or the permission of the court is subject to the provisions of NRS  
10 200.359.

11 This provision does not apply to vacations outside Nevada or North Carolina planned by  
12 either party.

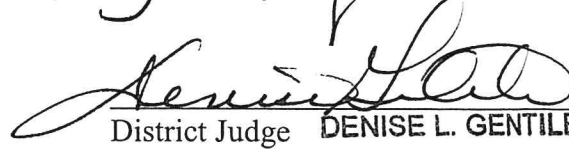
13 The parties, and each of them, are hereby placed on notice that in the event either party is  
14 ordered to pay child support to the other, that, pursuant to NRS 125.007, a parent responsible for  
15 paying child support is subject to NRS 31A.010 through NRS 31A.340, inclusive, and Sections 2  
16 and 3 of Chapter 31A of the Nevada Revised Statutes, regarding the withholding of wages and  
17 commissions for the delinquent payment of support, that these statutes and provisions require  
18 that, if a parent responsible for paying child support is delinquent in paying the support of a child  
19 that such person has been ordered to pay, then that person's wages or commissions shall  
20 immediately be subject to wage assignment and garnishment, pursuant to the provisions of the  
21 above-referenced statutes.

22 The parties acknowledge, pursuant to NRS 125B.145 , that an Order for the support of a  
23 child must, upon the filing of a request for review by:

24 (a) The welfare division of the department of human resources, its designated  
25 representative or the district attorney, if the welfare division or the district attorney has  
26 jurisdiction in the case; or,

1 (b) A parent or legal guardian of the child,  
2 be reviewed by the Court at least every 3 years pursuant to this section to determine  
3 whether the Order should be modified or adjusted. Further, if either of the parties is subject to an  
4 Order of child support, that party may request a review pursuant the terms of NRS 125B.145. An  
5 Order for the support of a child may be reviewed at any time on the basis of changed  
6 circumstances.

7 IT IS SO ORDERED on this 25<sup>th</sup> day of February, 2018.


8   
9 District Judge DENISE L. GENTILE (CH)

10 Respectfully submitted on this 19<sup>th</sup>  
11 day of November, 2018.

12 February, 2019  
13 HANRATTY LAW GROUP

Approved as to form and content on this 19<sup>th</sup>  
day of November, 2018.

1 LOUIS C. SCHNEIDER,  
ATTORNEY AT LAW

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