



## View Message

From: Amanda Reed

To: Devin Reed

(First View: 03/11/2019 07:39 AM)

Electronically Filed  
Jan 10 2022 10:44 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

RE: Abby medicine both kid fever

(Sent: 03/11/2019 07:16 AM)

Can you take a picture of the bottle? It's a 10 day script? We picked it up on the 6th.

On 03/11/2019 07:06 AM Devin Reed wrote:

Both kids were not sick at all this weekend i gave abby last dose of her antibiotics. Hopefully she is done w them .

On 03/08/2019 02:41 PM Amanda Reed wrote:

Abby last had her medicine at 6:30am.

Both kids had fevers last night. I gave them Motrin. Both kids were fine this am.



# EXHIBIT T



KG

Kelie >



Delivered

Today 12:22 PM

Abby slept through specials  
and everything

Se must not be feeling good at  
all

She is still sleeping



iMessage



Defendant 0120

APPX0389



KG

Kelie &gt;

Today 12:22 PM

Abby slept through specials  
and everything

Se must not be feeling good at  
all

She is still sleeping



iMessage





APPX0391

# EXHIBIT U



Kelie >



Today 8:15 AM

I walked off with her backpack

8:15 AM

Delivered

She is resting

8:48 AM



9:45 AM



iMessage



# EXHIBIT V

TIME 3:23 PM

Centennial Children's Dentistry

DATE 3/8/2019

**Patient Notes Master**FOR  
Shawn P. Reed

Date Entered	Format	Type	Tooth	Status	User
3/07/19 11:04 AM	Text	Chart		Verified	Harout V Gostanian DDS, MSD

**EMERGENCY**

Doctor/Assistant: G/ TIFFANY/ JESSICA  
 Health History Review: Meds: 0 Allergies: 0 Murrur: 0 Conditions: 0  
 Weight: 34.3  
 Age: 3

Chief Concern: PER MOM UPPER LEFT AND UPPER RIGHT DARK SPOTS ON TEETH B & I, SENSITIVE (Patient presents with his grandfather today)  
 BV: 0  
 PA: 2  
 Occl: 0

**NOTE**

DR G REVIEWED PAS TAKEN. ALL APPEARS NORMAL ON THE X-RAYS HOWEVER, DR G EXPLAINED TO GRANDFATHER THAT THERE ARE NUMEROUS (8 TOTAL) WATCH AREAS ON THE BACK MOLARS AND UPPER INCISORS THAT HAVE DEVELOPED IN THE LAST 5 MONTHS WHICH IS A BIG CHANGE FROM HIS PREVIOUS EXAM. DR G EXPLAINED THAT THESE WATCH AREAS ARE THE "BEGINNINGS" OF CAVITIES AND MAY NEED TREATMENT IN THE NEAR FUTURE IF THEY PROGRESS. PATIENT IS DUE FOR A ROUTINE CLEANING AND CHECK UP IN A MONTH OR SO AND DR G WILL REVIEW HIS FINDINGS WITH MOTHER OF THE PATIENT WHEN SHE COMES IN WITH HIM AT HIS NEXT CHECK UP. DR G EXPLAINED THAT IF THESE AREAS NEED TREATMENT AT NEXT EVALUATION, THEN PATIENT WILL NEED TO BE PUT TO SLEEP UNDER GENERAL ANESTHESIA AND DR G CAN DISCUSS THIS WITH MOTHER AT NEXT VISIT.  
 PT WILL BE DUE NEXT MONTH FOR 6MR. STRESSED BRUSHING AND FLOSSING TO GRANDPA - WILL RE-EVAL AT NEXT 6MR

Treatment Rendered: RMH. DR WENT OVER EXAM WITH GRANDPA

Behavior: COOP FOR EXAM. HAD BUTTON PUSHER FOR PAS

Next Visit: 6MR (IN 2 MONTHS TO REEVALUATE INCIPENT LESIONS (WATCH AREAS))

3/08/19 9:37 AM	Text	General	Verified	Hayley Henderson	This note has not been modified
-----------------	------	---------	----------	------------------	---------------------------------

Sent 1 Images via E-Mail

=====

To: ABBEYANDSHAWNMMOMMY@GMAIL.COM  
 Cc:  
 Subject: SHAWN REED

Message:

3/08/19 9:38 AM	Text	General	Verified	Hayley Henderson	This note has not been modified
-----------------	------	---------	----------	------------------	---------------------------------

Sent 1 Images via E-Mail

=====

To: ABBEYANDSHAWNMMOMMY@GMAIL.COM  
 Cc:  
 Subject: SHAWN REED

Message:

3/08/19 10:38 AM	Text	General	Verified	Hayley Henderson	This note has not been modified
------------------	------	---------	----------	------------------	---------------------------------

Sent 1 Images via E-Mail

=====

To: ABBEYANDSHAWNMMOMMY@GMAIL.COM  
 Cc:  
 Subject: SHAWN REED

Message:

# EXHIBIT W



APPX0397

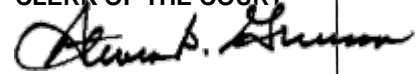


APPX0398

Defendant 0126



APPX0399



**SUPP**  
**HANRATTY LAW GROUP**  
Carrie J. Primas, Esq.  
State Bar of Nevada No. 12071  
1815 Village Center Circle, Suite 140  
Las Vegas, Nevada 89134  
PH: (702) 821-1379  
FAX: (702) 870-1846  
EMAIL: attorneys@hanrattylawgroup.com  
Attorneys for Defendant, Amanda Reed

**DISTRICT COURT**  
**FAMILY DIVISION**  
**CLARK COUNTY, NEVADA**

DEVIN REED,  
  
Plaintiff,  
  
v.  
  
AMANDA REED,  
  
Defendant.

Case No: D-18-568055-D  
Dept No: F

**SUPPLEMENT TO DEFENDANT'S  
OPPOSITION TO 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; AND  
COUNTERMOTION FOR JOINT  
LEGAL AND PRIMARY  
PHYSICAL CUSTODY OF THE  
MINOR CHILDREN, CHILD  
CUSTODY EVALUATION, CHILD  
SUPPORT, EXCLUSIVE  
POSSESSION, AND FOR  
ATTORNEY FEES AND COSTS**

COMES NOW Defendant, Amanda Reed, by and through her attorney,  
Carrie J. Primas, Esq., of Hanratty Law Group and as a supplement to *Defendant's*  
*Opposition to Plaintiff's Motion to Deem Defendant a Vexatious Litigant; for an*

1 *Order that Defendant's Father Stay away from Plaintiff Pursuant to the Behavior*  
2 *Order; for Return of Personal Property; for Attorney's Fees and Costs and Other*  
3 *Related Matters; and Countermotion for Joint Legal and Primary Physical Custody*  
4 *of the Minor Children, Child Custody Evaluation, Child Support Exclusive*  
5 *Possession, and for Attorney Fees and Costs, filed on March 8, 2019, Defendant*  
6  
7 hereby submits this supplement to update the Court on the events that have  
8  
9 occurred since the filing of the instant Opposition and Countermotion.

10       A. Knotts Berry Farm

11       On or about March 9, 2019, Amanda received a text message from her  
12  
13 cousin, Lauralyn, with a picture of the minor children, who were at Knott's Berry  
14 Farm with Devin<sup>1</sup>. Devin had not informed Amanda that he was taking the children  
15 out of town during his custodial time. This is the second time in the last several  
16 weeks that Devin has taken the children out of town and not informed Amanda or  
17 provided her any information about where the children are going to be.  
18

19       B. Medication

20       On or about March 5, 2019, Abby was diagnosed with a yeast infection and  
21  
22 was prescribed Cephalexin. The prescription was to be taken twice daily for ten  
23 (10) days<sup>2</sup>. Amanda picked up the prescription on March 6, 2019, and administered  
24 the first dose that morning. As such, her last dose should have been on March 15,  
25  
26

27 <sup>1</sup> A copy of the text message is attached as **Exhibit "Q"** in the Exhibits in Support of Supplement to Defendant's  
Opposition and Countermotion and is hereby fully incorporated herein by reference.

28 <sup>2</sup> A copy of the prescription is attached as **Exhibit "R"** in the Exhibits in Support of Supplement to Defendant's  
Opposition and Countermotion and is hereby fully incorporated herein by reference.

1 2019. However, on March 11, 2019, at 7:06 a.m., after having had custody of the  
2 children since the afternoon of March 8, 2019, Devin notified Amanda that he  
3 “gave Abby [her] last dose of her antibiotics<sup>3</sup>.” Amanda asked Devin to take a  
4 picture of the prescription bottle, as she believed it was a 10-day prescription, but  
5 he refused to do so. Amanda was able to confirm that it was a 10-day prescription  
6 when the children were returned to her. As a result of Devin’s refusal to properly  
7 administer Abby’s medication, Abby missed nine (9) doses of her medication,  
8 which had been prescribed for a serious and re-occurring yeast infection. As the  
9 Court will recall, this is not the first time Devin has refused to properly and fully  
10 administer Abby’s medication, alleging that it has run out prior to the end of the  
11 prescription.  
12

13  
14  
15 C. Abby sleeping in class  
16

17 On March 13, 2019, during Devin’s custodial time, Amanda went to Abby’s  
18 classroom to drop off some children that Amanda teaches for part of the day. She  
19 arrived in Abby’s classroom at approximately 11:15 a.m., and Abby was not at her  
20 desk. Abby’s teacher informed Amanda that Abby was laying on a bean bag, so  
21 Amanda went to see her, and she was laying there with her eyes closed. Abby  
22 opened her eyes and told Amanda that she was tired because she never sleeps at her  
23 dad’s house. Later that day, Abby’s teacher sent a text message to Amanda  
24  
25  
26  
27

28 <sup>3</sup> A copy of the communication is attached as **Exhibit “S”** in the Exhibits in Support of Supplemental to Defendant’s  
Opposition and Countermotion and is hereby fully incorporated herein by reference.

1 informed her that Abby had slept through the morning<sup>4</sup>. Ultimately, Abby slept  
2 until 2:00 p.m., which is the end of the school day.

3  
4 The next day, March 14, 2019, still during Devin's custodial time, Abby  
5 again slept for several hours in the classroom<sup>5</sup>. Abby told Amanda that she wanted  
6 to sleep the night before, but that her dad was doing things, and that if she would  
7 have told him she was tired he would have screamed at her.

8  
9 D. Shawn's dental concerns

10 Amanda's Opposition and Countermotion inadvertently stated that Shawn  
11 has five (5) cavities starting. In fact, on March 7, 2019, the dentist confirmed that  
12 Shawn has eight (8) watch areas, which is the beginning of cavities. As noted in the  
13 dental records, this is a drastic change from his previous exam five (5) months ago<sup>6</sup>.  
14 Again, this drastic change in dental health is consistent with the children's stating  
15 that they do not brush their teeth during Devin's custodial time.  
16  
17

18 E. Shawn's bruises

19 On March 14, 2019, after picking up the children from Devin's custodial  
20 time, Amanda noticed large bruises on Shawn's back. Amanda asked Shawn how  
21  
22  
23  
24  
25

26 <sup>4</sup> A copy of the text message and picture is attached as **Exhibit "T"** in the Exhibits in Support of Supplement to  
Defendant's Opposition and Countermotion and is hereby fully incorporated herein by reference.

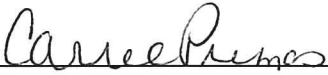
27 <sup>5</sup> A copy of the text message and picture is attached as **Exhibit "U"** in the Exhibits in Support of Supplement to  
Defendant's Opposition and Countermotion and is hereby fully incorporated herein by reference.

28 <sup>6</sup> A copy of Shawn's dental records is attached as **Exhibit "V"** in the Exhibits in Support of Supplemental to  
Defendant's Opposition and Countermotion and is hereby fully incorporated herein by reference.

1 he got the bruises, and Shawn stated, “maybe it happened when my daddy smacked  
2 me like this,” and then smacked himself on the back<sup>7</sup>.

3  
4 DATED this 18<sup>th</sup> of March, 2019.

5 **HANRATTY LAW GROUP**

6  
7   
8 Carrie J. Primas, Esq.  
9 Nevada Bar Number: 12071  
10 1815 Village Center Circle, Suite 140  
11 Las Vegas, Nevada 89134  
12 Phone: (702) 821-1379  
13 Fax: (702) 870-1846  
14 Email: attorneys@hanrattylawgroup.com  
15 Attorneys for Defendant, Amanda Reed  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

27  
28 <sup>7</sup> A copy of the photographs of Shawn Reed’s back are attached as **Exhibit “W”** in the Exhibits in Support of Supplement to Defendant’s Opposition and Countermotion and is hereby fully incorporated herein by reference.

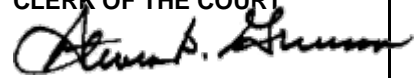
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

born

19  
20  
21  
22  
23  
24  
25  
26  
27  
28



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 Devin Reed

6 **EIGHTH JUDICIAL DISTRICT COURT**

7 **FAMILY DIVISION**

8 **CLARK COUNTY, NEVADA**

9 DEVIN REED,	)	Case Number:	D-18-568055-D
	)	Department:	F
10 Plaintiff,	)		
	)		
11 vs.	)	Date of Hearing:	March 20, 2019
	)	Time of Hearing:	10:00 a.m.
12 AMANDA REED,	)		
	)		
13 Defendant.	)		

14 **REPLY TO OPPOSITION AND COUNTERMOTION**

15 COMES NOW Plaintiff, DEVIN REED, by and through his attorney, LOUIS C.  
16 SCHNEIDER, ESQ., and hereby files her Reply to Opposition and Countermotion.

17 This Reply is made and based upon the files, the papers and pleadings in this action, and any  
18 argument of counsel and evidence that may be adduced at the time of Hearing on the within Motion.

19 Dated this 18th day of March, 2019.

20  
21 /s/ Louis C. Schneider  
22 **LOUIS C. SCHNEIDER, ESQ.**  
23 Nevada Bar Number: 009683

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

## STATEMENT OF FACTS

The Plaintiff, DEVIN REED and Defendant, AMANDA REED, filed for divorce and have already established custody with the parties sharing joint physical custody of their minor children to wit: Abby Reed, born April 6, 2013; and Shawn Reed, born July 3, 2015. Since filing for divorce the parties had been utilizing a temporary visitation schedule with a Week One and Week Two timeshare. The parties agreed to the visitation schedule of Week One and Week Two, and further agreed to make said schedule a permanent order of the Court at the October 16, 2018 hearing. The order was not entered until February 27, 2019 but the parties still have followed the agreed upon custodial schedule.

As stated in the Plaintiff's Motion, Defendant has a vexatious mind set and is certain she can gain primary physical custody by beating Plaintiff into litigation submission. Defendant whines to the Court about Plaintiff intentionally filing his Motion on February 14, 2019, the anniversary of the day they met. The date of filing has nothing to do with the parties' relationship history as it was Plaintiff's Counsel who filed said Motion on February 14, 2019 and Counsel had no way of knowing this was a significant date to the parties and in no way does the red herring matter. It was Defendant who chose to contact the Police to do a "Wellness Check" on the date she holds so dear to her heart.

## POINTS AND AUTHORITIES

The standard for custody in Nevada is for the parties to share joint legal and joint physical custody. In *Rivero v. Rivero* the Court found that the definition of joint physical custody must calculate out to be at least a 60/40 split to be considered joint physical custody but in *Bluestein v. Bluestein* the Court found that it is "in the best interest of the children" to allow a more creative calculation to avoid unnecessary bean counting and minute crunching between the parties. The Court in this case has already determined that the parties share joint physical custody and Defendant has shown no actual proof that Plaintiff is unfit to maintain the joint physical custody schedule. Now the Defendant is requesting the Court order a Child Evaluation to be done and to re-address custody awarding her primary custody and Plaintiff's visitation to be limited. It is unclear what kind of visitation schedule Defendant is willing to agree to other than visitation to be at her discretion. What is clear is that Defendant would certainly abuse any order to continue to harass Plaintiff and limit his timeshare with the children.

1 The custodial timeshare the parties previously agreed to at the October 16, 2018 hearing  
2 should remain as a permanent order and should only be slightly modified to adjust to the parties  
3 schedules, if needed. Defendant continues to schedule events during Plaintiff's custodial timeshare.  
4 It normally would not be an issue but the parties are unable to agree to the time of day and therefore  
5 should not be scheduling any events unless *both* parties have had a chance to discuss and agree to any  
6 extracurricular activities or until further order of the Court. It is not fair that Defendant micro-  
7 manages Plaintiff's custodial time with the children.

8 It is unfortunate that the parties daughter is prone to yeast infections but the Plaintiff is not  
9 the source of cause. Defendant compiled medical records to somehow show that Plaintiff has  
10 neglected his children's medical issues. This is all speculative and the Court cannot entertain the  
11 Defendant's vexatious claims. The Plaintiff takes the children's hygiene very seriously and is highly  
12 offended Defendant would suggest otherwise. Plaintiff even does an underwear check and will ask  
13 Abby how she is feeling or if she "itches". As Defendant points out Abby is prone to the yeast  
14 infection and it is truly sad this was included in her pleading. It is Plaintiff's understanding that  
15 Defendant's family has a history of this kind of issue and has obviously passed this trait on to her  
16 daughter. Additionally, when Defendant provides medications for the children, Plaintiff has  
17 administered all medications appropriately. The only time the medications ran short is when  
18 Defendant failed to provide Shawn's medication. Apparently the children were taking the same  
19 medication and Plaintiff had a limited amount. In turn Plaintiff did run out of medication. It is  
20 impossible for Defendant to know exactly what happens in Plaintiff's home and she should not be  
21 grilling the children about daddy's house.

22 Defendant insists that Plaintiff is "playing games" by not responding immediately to her or  
23 by not dropping of the children precisely when she wished. Plaintiff sees no issue with spending time  
24 with is son and does drop him off after taking Abby to school. Plaintiff has been trying to follow the  
25 Court orders to avoid any issues with the Defendant but she insists on interjecting herself in his life.  
26 The Defendant is attempting to control what the Plaintiff does while the children are in his care.  
27 Again Defendant's nit picking is not a bases to change custody and she has not met her burden under  
28 the current standards. The Court should uphold and affirm the current custody order pursuant to the

1 *Bluestein* joint physical definition.

2 Defendant has decided focus on litigating as apposed to finalizing the divorce. The parties  
3 share joint legal custody and joint physical custody and should continue share custody. The only  
4 outstanding issues left in the divorce should be the division of property which includes the marital  
5 residence where Defendant is currently living. Now Defendant wants to re-litigate custody and  
6 visitation and to have the children evaluated despite the fact that the parties already agreed on the  
7 record to a permanent custody order.

8 In NRS 18.010(2)(b) as previously cited an award of attorney's fees is appropriate in this case  
9 to deter Defendant from making future bogus claims of neglect against Plaintiff.

10 NRS 18.010(2)(b) ... Without regard to the recovery sought, when the court finds that  
11 the claim, counterclaim, cross-claim or third-party complaint or defense of the  
12 opposing party was brought or maintained without reasonable ground or to harass the  
13 prevailing party. The court shall liberally construe the provisions of this paragraph  
14 in favor of awarding attorney's fees in all appropriate situations. It is the intent of the  
15 Legislature that the court award attorney's fees pursuant to this paragraph and impose  
16 sanctions pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all  
17 appropriate situations to punish for and **deter frivolous or vexatious claims** and  
18 defenses because such claims and defenses overburden limited judicial resources,  
19 hinder the timely resolution of meritorious claims and increase the costs of engaging  
20 in business and providing professional services to the public.

21 In this case an award of attorney's fees would limit Defendant's want to continuously  
22 litigating the same issues. With custody being a permanent order and Defendant have agreed to the  
23 custody schedule on record, her request to change custody clearly shows her vindictive nature and  
24 need to micro-manage. Plaintiff should be awarded attorney's fee for having to defend himself  
25 against the frivolous claims and the needless inflation of attorney's fees.

26 **DATED** this 19th day of March, 2019.

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

## Divorce - Complaint

## COURT MINUTES

March 20, 2019

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

March 20, 2019      10:00 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

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 RELIEF...RETURN HEARING REGARDING PLAINTIFF'S ATI RESULTS...DEFENDANT'S OPPOSITION TO 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 RELIEF AND COUNTERMOTION FOR JOINT LEGAL AND PRIMARY PHYSICAL CUSTODY OF THE MINOR CHILDREN, CHILD CUSTODY EVALUATION, CHILD SUPPORT, EXCLUSIVE POSSESSION AND FOR ATTORNEY'S FEES AND COSTS...PLAINTIFF'S REPLY TO OPPOSITION AND COUNTERMOTION

Court reviewed the matters on calendar and confirmation of Plaintiff's ATI results. Statements by Attorney Schneider regarding Defendant drawing out the litigation, the parties' prior agreement to share custody and only unresolved issue being the house and request for attorney fees. Argument by Attorney Primas regarding ongoing health concerns involving the minor child, allegations of manipulation by Plaintiff, Defendant's request for a child custody evaluation and Defendant's request for modification of child support. Statements by Defendant regarding the daughter's reoccurring health issues.

COURT ORDERED the following.

1. The request to deem Defendant a vexatious is DENIED.
2. The request to keep Defendant's father away is DENIED as this Court has no jurisdiction over 3rd parties.
3. All other issues will be address via MINUTE ORDER.

## INTERIM CONDITIONS:

## FUTURE HEARINGS:

Mar 22, 2019 12:05AM Status Check  
Courtroom 03 Gentile, Denise L

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

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

April 08, 2019

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

**April 08, 2019      10:00 AM      Minute Order**

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

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

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

- COURT FINDS this matter was heard before the Court on 3/20/2019, and set for review by the Court on 3/22/2019 to make a determination on the parties' Motions and Oppositions. COURT FINDS that this matter has been pending since 3/20/2018. COURT FINDS that the parties stipulated to a custody schedule to resolve the issue of custody. COURT FINDS that the issue of Plaintiff's employment was addressed and whether he is actively seeking employment or choosing not to pursue gainful employment thus failing to support his family. COURT FINDS that Defendant sought for this Court to re-open the issue of custody and to allow a custody evaluation to be conducted, even though the parties agreed to a custody schedule and made it a final order of the Court. COURT FINDS that the custody evaluation was sought due to medical concerns raised by Defendant, and claims that Plaintiff fails to properly address medical issues, claims that the issues are caused by Plaintiff even though the child and child's medical history dictates that the medical issues are

PRINT DATE:	04/08/2019	Page 1 of 2	Minutes Date:	April 08, 2019
-------------	------------	-------------	---------------	----------------

**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

APPX0412

potentially chronic. COURT FINDS that while there are concerns that Plaintiff may not address the issues in the same manner as Defendant, the Court does not FIND there is a basis to conduct a custody evaluation or a trial on custody. COURT ORDERED and reviewed Plaintiff's drug tests, which were negative, contrary to the claims of Defendant; COURT ORDERED the CPS records, which did not indicate there was any substantiated issue with either parent. COURT ORDERS that the parties shall continue to adhere to their agreed upon custody schedule. COURT ORDERS that the Defendant's requests are DENIED. COURT ORDERS that the Plaintiff's request which was already addressed at the hearing is also DENIED. Child support and all other financial issues shall be addressed at the time of trial, in the event the parties have not resolved the matter amicably.

COURT ORDERS that the parties shall conclude discovery on or before June 11, 2019. A Pre-trial conference is hereby scheduled for **June 11, 2019 at 1:30 p.m.** Parties shall be prepared to submit their Pre-trial Memoranda and proceed to trial within 30 days of the date of the Pre-Trial Conference. In the event the parties desire to conduct a senior judge or judicial settlement conference, they may submit a stipulation to the Court or contact the JEA, and the Court will make its best efforts to schedule a conference prior to a trial in this matter – or the parties are encouraged to attempt resolution on their own accord, either between counsel, or with a private mediator.

The status hearing on this Court's chambers calendar is hereby VACATED.

Plaintiff's counsel shall prepare the Order consistent with this Minute Order.

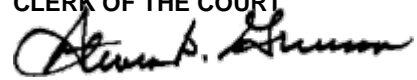
CLERK'S NOTE: On 4/8/19 a copy of the Court's Minute Order was placed in each Attorney's folder located in the Clerk's Office. (mm)

**FUTURE HEARINGS:** June 11, 2019 1:30 PM Pre Trial Conference  
Gentile, Denise L  
Courtroom 03  
Slayton, Andrea

PRINT DATE:	04/08/2019	Page 2 of 2	Minutes Date:	April 08, 2019
-------------	------------	-------------	---------------	----------------

**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

APPX0413



1 NOPC  
2 UNLV Division of Educational Outreach  
3 Kathleen Ja Soo Berquist, Esq.  
4 851 East Tropicana  
5 Las Vegas, Nevada 89119  
6 702 895 3394 TEL  
7 702 895 4195 FAX  
8 continuing.education@unlv.edu

6 DISTRICT COURT, FAMILY DIVISION  
7 CLARK COUNTY, NEVADA

8 \* \* \*

9 DEVIN BRYSON REED,  
10 Plaintiff,  
11 vs.

Case No.: D-18-568055-D  
Dept. No.: F

12 AMANDA RAELENE REED,  
13  
14 Defendant.

**NOTICE OF SEMINAR COMPLETION  
EDCR 5.07**

15  
16 Defendant, Amanda Raelene Reed, hereby submits Exhibit 1, attached hereto, attesting to  
17 their completion of the Cooperative Parenting Course offered by the University of Nevada Las  
18 Vegas.

19  
20 DATED this 26th day of April 2019.



21  
22 Kathleen Ja Soo Berquist, Esq.  
23 UNLV Division of Educational Outreach  
24 851 East Tropicana  
25 Las Vegas, Nevada 89119  
26 702 895 3394 TEL  
27 702 895 4195 FAX  
28 continuing.education@unlv.edu

APPX0414

April 26, 2019

Judge Denise Gentile  
Family Court Division, Department F  
Family Courthouse  
601 N. Pecos  
Las Vegas, Nevada 89155

Re: Amanda Raelene Reed  
*Devin Bryson Reed, Plaintiff*  
*vs. Amanda Raelene Reed, Defendant*  
Case No. D-18-568055-D

Dear Judge Gentile,

This letter is to confirm that the following individual has completed the UNLV Cooperative Parenting Program, offered through the UNLV Division of Educational Outreach:

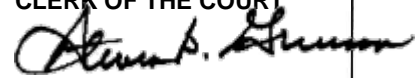
*Amanda Raelene Reed*

Please do not hesitate to contact me if you need additional information. Thank you for your referral to this program.

Sincerely,



Kathleen Ja Sook Bergquist, LCSW, JD, Ph.D.  
Program Facilitator  
(702) 895-2449  
kathleen.bergquist@unlv.edu



CERT  
HANRATTY LAW GROUP  
Carrie J. Primas, Esq.  
State Bar of Nevada No. 12071  
1815 Village Center Circle, Suite 140  
Las Vegas, Nevada 89134  
PH: (702) 821-1379  
FAX: (702) 870-1846  
EMAIL: attorneys@hanrattylawgroup.com  
Attorneys for Defendant, Amanda Reed

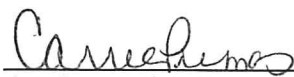
DISTRICT COURT  
CLARK COUNTY, NEVADA

DEVIN REED,	)	Case No: D-18-568055-D
	)	Dept No: F
Plaintiff,	)	
	)	LETTER OF COMPLETION FROM THE
v.	)	UNLV COOPERATIVE PARENTING
	)	PROGRAM
AMANDA REED,	)	
	)	
Defendant.	)	

ATTACHED please find Defendant's letter of completion from the UNLV  
COOPERATIVE PARENTING PROGRAM.

Dated this 30<sup>th</sup> day of April, 2019.

HANRATTY LAW GROUP

  
Carrie J. Primas, Esq.  
State Bar of Nevada No. 12071  
1815 Village Center Circle, Suite 140  
Las Vegas, Nevada 89134  
PH: (702) 821-1379  
FAX: (702) 870-1846  
EMAIL: attorneys@hanrattylawgroup.com  
Attorneys for Defendant, Amanda Reed

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Louis C. Schneider, Esq.  
430 South 7<sup>th</sup> Street  
Las Vegas, Nevada 89101  
*Attorney for Plaintiff*

By: W.D.K.

April 26, 2019

Judge Denise Gentile  
Family Court Division, Department F  
Family Courthouse  
601 N. Pecos  
Las Vegas, Nevada 89155

Re: Amanda Raelene Reed  
*Devin Bryson Reed, Plaintiff*  
*vs. Amanda Raelene Reed, Defendant*  
Case No. D-18-568055-D

Dear Judge Gentile,

This letter is to confirm that the following individual has completed the UNLV Cooperative Parenting Program, offered through the UNLV Division of Educational Outreach:

*Amanda Raelene Reed*

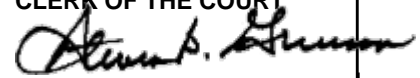
Please do not hesitate to contact me if you need additional information. Thank you for your referral to this program.

Sincerely,



Kathleen Ja Sook Bergquist, LCSW, JD, Ph.D.  
Program Facilitator  
(702) 895-2449  
kathleen.bergquist@unlv.edu

Case Number: D-18-568055-D



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 lcslawllc@gmail.com  
8 Attorney for the Plaintiff

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

9 DEVIN REED, )  
10 )  
11 Plaintiff, ) Case Number: D-18-568055-D  
12 ) Department: F  
13 vs. )  
14 )  
15 AMANDA REED, )  
16 )  
17 Defendant. )

13 **ORDER FROM MARCH 20, 2019 HEARING**

14 **THIS MATTER** having come on for hearing on March 20, 2019 for Plaintiff's Motions and  
15 Defendant's Oppositions and Countermotions filed herein and set for a review by the Court and the  
16 Plaintiff, DEVIN REED, appearing personally and together with his attorney of record, LOUIS C.  
17 SCHNEIDER, ESQ., and the Defendant, AMANDA REED, appearing personally and together with  
18 her attorney of record and the Court having reviewed all of the pleadings and papers herein and  
19 hearing argument of both Counsel and testimony of the parties, the Court hereby finds and orders the  
20 following:

21 **THE COURT HEREBY FINDS** that this matter has been pending since March 20, 2018.

22 **THE COURT FURTHER FINDS** that the parties previously stipulated to a custody schedule  
23 to resolve the issue of custody.

24 **THE COURT FURTHER FINDS** that Defendant sought for this Court to re-open the issue  
25 of custody and to allow a custody evaluation to be conducted, even though the parties agreed to a  
26 custody schedule and made it a final order of the Court.

RECEIVED  
MAY 16 2019  
DEPARTMENT F

APPX0421

1           **THE COURT FURTHER FINDS** that a custody evaluation was sought due to medical  
2 concerns raised by Defendant, and claims that Plaintiff fails to properly address medical issues and  
3 further claims that the issues are caused by Plaintiff even though the child and child's medical history  
4 dictates that the medical issues are potentially chronic.

5           **THE COURT FURTHER FINDS** that while there are concerns that Plaintiff may not  
6 address the issues in the same manner as Defendant, the Court does not *find* there is a basis to conduct  
7 a custody evaluation or a trial on custody.

8           **THE COURT FURTHER FINDS** that the issue of Plaintiff's employment was addressed  
9 and whether he is actively seeking employment or choosing not to pursue gainful employment thus  
10 failing to support his family.

11           **THE COURT FURTHER FINDS** that the Court reviewed Plaintiff's drug tests, which were  
12 negative, contrary to the claims of Defendant.

13           **THE COURT FURTHER FINDS** that the Court reviewed the CPS records, which did not  
14 indicate there was any substantiated issue with either parent.

15           **NOW THEREFORE**, the Court issues the following **ORDERS**:

16           **IT IS HEREBY ORDERED** that the parties shall continue to adhere to their agreed upon  
17 custody schedule

18           **IT IS FURTHER ORDERED** that the Defendant's requests are **DENIED**.

19           **IT IS FURTHER ORDERED** that the Plaintiff's requests, which was already addressed at  
20 the hearing, is also **DENIED**.

21           **IT IS FURTHER ORDERED** that child support and all other financial issues shall be  
22 addressed at the time of trial, in the event the parties have not resolved the matter amicably.

23           **IT IS FURTHER ORDERED** that COURT ORDERS that the parties shall conclude  
24 discovery on or before June 11, 2019.

25           **IT IS FURTHER ORDERED** that a Pre-trial Conference is hereby scheduled for June 11,  
26 2019 at 1:30 p.m.

27           **IT IS FURTHER ORDERED** that Parties shall be prepared to submit their Pre-trial  
28 Memoranda and proceed to trial within 30 days of the date of the Pre-Trial Conference.

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

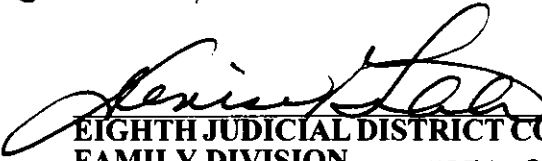
1           **IT IS FURTHER ORDERED** that in the event the parties desire to conduct a Senior Judge  
2 or Judicial Settlement Conference, they shall submit a stipulation to the Court or contact the JEA, and  
3 the Court will make its best efforts to schedule a conference prior to a trial in this matter.

4           **IT IS FURTHER ORDERED** that the parties are encouraged to attempt resolution on their  
5 own accord, either between counsel, or with a private mediator.

6           **IT IS FURTHER ORDERED** that the status hearing on this Court's Chambers calendar is  
7 hereby VACATED.

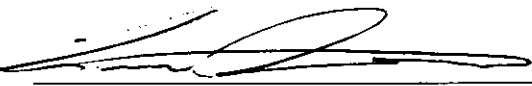
8           **IT IS FURTHER ORDERED** that Plaintiff's counsel shall prepare the Order consistent with  
9 this Minute Order.


10           **IT IS SO ORDERED** on this 28<sup>th</sup> day of May, 2019.

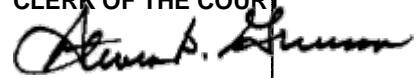
11  
12   
13 **EIGHTH JUDICIAL DISTRICT COURT JUDGE**  
**FAMILY DIVISION** DENISE L. GENTILE (g)

14 Respectfully submitted by:

Approved as to form and content:

15  
16   
17 **LOUIS C. SCHNEIDER, ESQ.**  
18 Nevada Bar Number: 009683  
19 430 South 7th Street  
20 Las Vegas, Nevada 89101  
21 Phone: 702-435-2121  
22 Attorney for the Plaintiff

23  
24   
25 **CARRIE J. PRIMAS, ESQ.**  
26 Nevada Bar Number: 12071  
27 1815 Village Center Circle, Ste. 140  
28 Las Vegas, Nevada 89134  
Phone: 702-821-1379  
Attorney for Defendant



LOUIS C. SCHNEIDER, ESQ.  
Nevada Bar No.: 9683  
430 South 7<sup>th</sup> Street  
Las Vegas, Nevada 89101  
T: (702) 435-2121  
F: (702) 431-3807  
[lcslawllc@yahoo.com](mailto:lcslawllc@yahoo.com)  
*Attorney for Plaintiff*

**DISTRICT COURT – FAMILY DIVISION  
CLARK COUNTY, NEVADA**

DEVIN REED,

Plaintiff,

vs.

AMANDA REED,

Defendant,

Case No.: D-18-568055-D

Dept. No.: F

**NOTICE OF ENTRY OF  
ORDER**

TO ALL INTERESTED PARTIES and their legal counsel, If applicable:

PLEASE TAKE NOTICE that the Order from March 20, 2019, hearing was entered on May 29, 2019; a true and correct copy is attached hereto.

Dated this 10th day of June, 2019.

/s/ Louis C. Schneider, Esq.  
LOUIS C. SCHNEIDER, ESQ.  
Nevada Bar No.: 9683  
430 S. 7<sup>th</sup> St.  
Las Vegas, NV 89101  
(702) 435-2121  
[lcslawllc@yahoo.com](mailto:lcslawllc@yahoo.com)

APPX0424

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Louis C. Schneider, Esq. and that  
on the 10th day of June, 2019, I served a true and correct copy of the above and  
forgoing **NOTICE OF ENTRY OF ORDER** on the parties addressed as shown below:

  X   Via Electronic Service [NEFR Rule 9]

       Via facsimile [EDCR 7.26(a)]

       Via U.S. Mail (NRCP 5(b))

       Hand Delivered

HANRATTY LAW GROUP  
Carrie J. Primas, Esq.  
1815 Village Center Circle, Suite 140  
Las Vegas, Nevada 89134

      /s/ Stacie Comerio        
An Employee of Louis C. Schneider, Esq.



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,

Case Number:

D-18-568055-D

Department:

F

15 vs.

16 **AMANDA REED,**

17 Defendant.

18 **ORDER FROM MARCH 20, 2019 HEARING**

19 **THIS MATTER** having come on for hearing on March 20, 2019 for Plaintiff's Motions and  
20 Defendant's Oppositions and Countermotions filed herein and set for a review by the Court and the  
21 Plaintiff, DEVIN REED, appearing personally and together with his attorney of record, LOUIS C.  
22 SCHNEIDER, ESQ., and the Defendant, AMANDA REED, appearing personally and together with  
23 her attorney of record and the Court having reviewed all of the pleadings and papers herein and  
24 hearing argument of both Counsel and testimony of the parties, the Court hereby finds and orders the  
25 following:

26 **THE COURT HEREBY FINDS** that this matter has been pending since March 20, 2018.

27 **THE COURT FURTHER FINDS** that the parties previously stipulated to a custody schedule  
28 to resolve the issue of custody.

**THE COURT FURTHER FINDS** that Defendant sought for this Court to re-open the issue  
of custody and to allow a custody evaluation to be conducted, even though the parties agreed to a  
custody schedule and made it a final order of the Court.