

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

RECEIVED  
MAY 16 2019  
DEPARTMENT F

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.

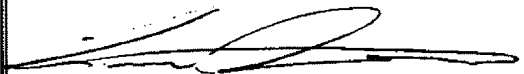
8           **IT IS FURTHER ORDERED** that Plaintiff's counsel shall prepare the Order consistent with  
9 this Minute Order.


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

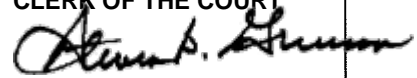
11  
12  
13             
EIGHTH JUDICIAL DISTRICT COURT JUDGE  
FAMILY DIVISION   DENISE L. GENTILE (C)

14           Respectfully submitted by:

Approved as to form and content:

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

20  
21             
22           **CARRIE J. PRIMAS, ESQ.**  
Nevada Bar Number: 12071  
1815 Village Center Circle, Ste. 140  
23           Las Vegas, Nevada 89134  
Phone: 702-821-1379  
24           Attorney for Defendant  
25  
26  
27  
28



LOUIS SCHNEIDER, ESQ.  
Nevada Bar No.: 9683  
LAW OFFICES OF LOUIS C. SCHNEIDER, LLC  
Email: lcslaw@yahoo.com  
430 South 7th Street  
Las Vegas, NV 89101  
Ph: (702) 435-2121  
Fax: (702) 431-3807  
*Attorney for Plaintiff*

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

DEVIN REED,

Plaintiff,

vs.

AMANDA REED,

Defendant.

Case No. D-18-568055-D

Dept. F

**PLAINTIFF'S PRE-TRIAL MEMORANDUM**

COMES NOW, Plaintiff, DEVIN REED, by and through his attorney of record, LOUIS C. SCHNEIDER, ESQ., of LAW OFFICES OF LOUIS SCHNEIDER and pursuant to EDCR 5.87, respectfully submits his Pre-Trial Memorandum.

**I. STATEMENT OF ESSENTIAL FACTS**

- A. The Plaintiff is Devin Reed
- B. The Defendant is Amanda Reed
- C. The parties were married on the 2<sup>nd</sup> day of October, 2008
- D. Resolved Issues: NONE
- E. Unresolved Issues: HOUSE AND PERSONAL PROPERTY

1 **II. CHILD CUSTODY**

2 To be addressed in Court. The parties have two children in common.

3 Abby Reed, date of birth April 6, 2013 and

4 Shawn Reed, date of birth July 3, 2015

5 **III. CHILD SUPPORT**

6 To be addressed in Court

7 **IV. SPOUSAL SUPPORT**

8 Parties are not requesting Spousal Support.

9 **V. PROPERTY AND DEBTS**

10 House

11 **VI. ATTORNEY FEES**

12 Plaintiff is requesting attorney fees and costs in the amount of \$5,000.00.

13 **VII. LIST OF WITNESSES**

14 1. **Deborah Katzman**

15 Oasis Appraisal

16 6056 Camora Court

17 Las Vegas, NV 89148

18 Phone (702) 591-7252

19 Deborah is the licensed real estate appraiser used to appraise the property.

20 **X. LENGTH OF TRIAL**

21 Half Day.

22 DATED: This 10th day of June, 2019.

23 /s/ Louis C. Schneider, Esq.

24 LOUIS SCHNEIDER, ESQ.

25 Nevada Bar No.: 9683

26 LAW OFFICES OF LOUIS C. SCHNEIDER, LLC

27 Email: lcsllawllcc@gmail.com

28 430 South 7th Street

Las Vegas, NV 89101

Ph: (702) 435-2121

Attorney for Plaintiff

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☒ Via Electronic Service [NEFR Rule 9]  
☐ Via facsimile [EDCR 7.26 (a) ]  
☐ Via U.S. Mail [ NRCP 5 ( b ) ]  
☐ Hand Deliver

/s/ Shannon McMillen  
An Employee of Louis C. Schneider, Esq.

## Divorce - Complaint

## COURT MINUTES

June 11, 2019

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

June 11, 2019      01:30 PM      Pre Trial Conference

HEARD BY:      Gentile, Denise L      COURTROOM: Courtroom 03

COURT CLERK:      McCulloch, Melissa

## PARTIES PRESENT:

Devin Bryson Reed, Counter Defendant, Plaintiff,      Louis C. Schneider, Attorney, Present  
Not Present

Amanda Raelene Reed, Counter Claimant,      Carrie J. Primas, ESQ, Attorney, Present  
Defendant, Not Present

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

Shawn Reed, Subject Minor, Not Present

## JOURNAL ENTRIES

## PRE-TRIAL CONFERENCE

Counsel represented there has been no agreement as to the financial issues and request an additional thirty (30) days for discovery. Discussion regarding health insurance coverage and the child's therapy being covered by same. Further discussion regarding contact made between Defendant's father and the Marshall assigned to this Court on 1/23/19. Court NOTES, Attorney Schneider WAIVES any potential concerns or conflict regarding same.

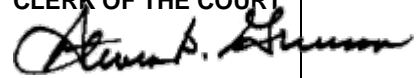
## COURT ORDERED the following:

1. Pursuant to STIPULATION, Defendant will allow the new appraiser into the residence to complete a 2nd appraisal. It was confirmed that Plaintiff still owes Defendant for one-half the cost of the initial appraisal.
2. NON-JURY TRIAL set for 9/12/19 at 1:30 p.m. regarding divorce.
3. Discovery will CLOSE 8/1/19.
4. Pretrial Memorandums shall be filed/served, with courtesy copies provided to the Court, no later than fourteen (14) days prior to trial.
5. Exhibit Lists and Witness Lists shall be exchanged no later than one (1) week prior to trial with courtesy copies provided to the Court at least two (2) days prior to trial.

## INTERIM CONDITIONS:

## FUTURE HEARINGS:

Sep 12, 2019 1:30PM Non-Jury Trial  
Courtroom 03 Gentile, Denise L



ASTA  
LAW OFFICES OF F. PETER JAMES, ESQ.  
F. Peter James, Esq.  
Nevada Bar No. 10091  
Peter@PeterJamesLaw.com  
3821 West Charleston Boulevard, Suite 250  
Las Vegas, Nevada 89102  
702-256-0087  
702-256-0145 (fax)  
Counsel for Defendant

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

DEVIN REED,  
  
Plaintiff,

vs.

AMANDA REED,  
  
Defendant.

CASE NO. : D-18-568055-D  
DEPT. NO. : F

**CASE APPEAL STATEMENT**

**1. Name of the appellant filing this Case Appeal Statement:**

Amanda Reed, the Defendant in the district court

**2. Identify the judge issuing the decision, judgment, or order appealed from:**

Hon. Denise Genitle, District Court Judge (Family Division), Dept. F.



**3. Identify each appellant and the name and address of counsel for each appellant:**

Amanda Reed, Appellant

F. Peter James, Esq.  
Law Offices of F. Peter James, Esq.  
3821 West Charleston Boulevard, Suite 250  
Las Vegas, Nevada 89102  
702-256-0087  
702-256-0145 (fax)  
Counsel for Appellant

**4. Identify each respondent and the name and address of appellate counsel, if known, for each respondent (if the name of a respondent's appellate counsel is unknown, indicate as much and provide the name and address of that respondent's trial counsel):**

Respondent, Devin Reed

Louis C. Schneider, Esq.  
430 South 7<sup>th</sup> Street  
Las Vegas, Nevada 89101  
702-435-2121  
702-431-3807 (fax)  
Counsel for Respondent

**5. Indicate whether any attorney identified above in response to question 3 or 4 is not licensed to practice law in Nevada and, if so, whether the district court granted that attorney permission to appear under SCR**

1       **42 (attach a copy of any district court order granting such**  
2       **permission):**

3       All counsel referenced above are licensed to practice law in the State of  
4 Nevada.

5       **6.     Indicate whether appellant is represented by appointed or retained**  
6       **counsel in the district court:**

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

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

10       Appellant is represented by retained counsel on appeal.

11       **8.     Indicate whether appellant was granted leave to proceed in forma**  
12       **pauperis and the date of entry of the district court order granting such**  
13       **leave:**

14       Appellant was never granted leave to proceed in forma pauperis.

15       **9.     Indicate the date the proceedings commenced in the district court:**

16       The Complaint for Divorce was filed on March 20, 2018.

17       **10.    Provide a brief description of the action and result in the district court,**  
18       **including the type of judgment or order being appealed and the relief**  
19       **granted by the district court:**

20

1 The action in the lower court is a divorce action with child custody. The  
2 Court issued a final order as to child custody. Subsequent to that,  
3 Defendant / Appellant moved the district court to modify custody. This  
4 was denied. This appeal followed.

5 **11. Indicate whether the case has previously been the subject of an appeal**  
6 **to or original writ proceeding in the Supreme Court and, if so, the**  
7 **caption and Supreme Court docket number of the prior proceeding:**

8 N/A.

9 **12. Please state whether the appeal involves child custody or visitation:**

10 The appeal does involve child custody and visitation issues.

11 **13. Please state whether the appeal involves the possibility of settlement:**

12 The main issues appear to be highly unlikely to resolve in a settlement  
13 conference.

14 Dated this 21<sup>st</sup> day of June, 2019

15 /s/ *F. Peter James*

16 

---

LAW OFFICES OF F. PETER JAMES

17 F. Peter James, Esq.

18 Nevada Bar No. 10091

3821 W. Charleston Blvd., Suite 250

18 Las Vegas, Nevada 89102

702-256-0087

19 Counsel for Defendant

1 **CERTIFICATE OF SERVICE**

2 I certify that on this 21<sup>st</sup> day of June, 2019, I caused the above and  
3 foregoing document entitled **CASE APPEAL STATEMENT** to be served as  
4 follows:

5 [x] pursuant to EDCR 8.05(A), EDCR 8.05(F), NRCP 5(b)(2)(D)  
6 and Administrative Order 14-2 captioned "In the Administrative  
7 Matter of Mandatory Electronic Service in the Eighth Judicial  
8 District Court," by mandatory electronic service through the  
9 Eighth Judicial District Court's electronic filing system;

8 [ ] by placing same to be deposited for mailing in the United States  
9 Mail, in a sealed envelope upon which first class postage was  
prepaid in Las Vegas, Nevada;

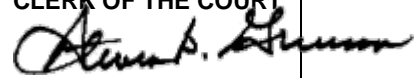
10 [ ] pursuant to EDCR 7.26 / NEFCR 9, to be sent via facsimile /  
11 email;

12 to the attorney(s) / party(ies) listed below at the address(es), email address(es),  
13 and/or facsimile number(s) indicated below:

14 Louis C. Schneider, Esq.  
15 430 South 7<sup>th</sup> St.  
16 Las Vegas, Nevada 89101  
Counsel for Plaintiff

17 By: /s/ *F. Peter James*

18 \_\_\_\_\_  
An employee of the Law Offices of F. Peter James, Esq., PLLC



**NOAS**  
LAW OFFICES OF F. PETER JAMES, ESQ.  
F. Peter James, Esq.  
Nevada Bar No. 10091  
Peter@PeterJamesLaw.com  
3821 West Charleston Boulevard, Suite 250  
Las Vegas, Nevada 89102  
702-256-0087  
702-256-0145 (fax)  
Counsel for Defendant

**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 APPEAL**

Notice is hereby given that Defendant, Amanda Reed, hereby appeals to  
the Supreme Court of Nevada from the Order entered on May 29, 2019 and any

///

///

///

///

///

1 related prior interlocutory orders.

2 Dated this 21<sup>st</sup> day of June, 2019

3 /s/ *F. Peter James*

4 LAW OFFICES OF F. PETER JAMES

F. Peter James, Esq.

5 Nevada Bar No. 10091

3821 W. Charleston Blvd., Suite 250

6 Las Vegas, Nevada 89102

702-256-0087

7 Counsel for Defendant

8

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1 **CERTIFICATE OF SERVICE**

2 I certify that on this 21<sup>st</sup> day of June, 2019, I caused the above and  
3 foregoing document entitled **NOTICE OF APPEAL** to be served as follows:

4 [X] pursuant to EDCR 8.05(A), EDCR 8.05(F), NRCP 5(b)(2)(D)  
5 and Administrative Order 14-2 captioned "In the Administrative  
6 Matter of Mandatory Electronic Service in the Eighth Judicial  
District Court," by mandatory electronic service through the  
Eighth Judicial District Court's electronic filing system;

7 [ ] by placing same to be deposited for mailing in the United States  
8 Mail, in a sealed envelope upon which first class postage was  
prepaid in Las Vegas, Nevada;

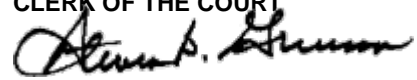
9 [ ] pursuant to EDCR 7.26 / NEFCR 9, to be sent via facsimile /  
10 email;

11 to the attorney(s) / party(ies) listed below at the address(es), email address(es),  
12 and/or facsimile number(s) indicated below:

13 Louis C. Schneider, Esq.  
14 430 South 7<sup>th</sup> St.  
Las Vegas, Nevada 89101  
15 Counsel for Plaintiff

16 By: /s/ *F. Peter James*

17 \_\_\_\_\_  
An employee of the Law Offices of F. Peter James, Esq., PLLC  
18  
19  
20



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.

12 AMANDA RAELENE REED,

13  
14 Defendant

Case No.: D-18-568055-D

Dept. No.: F

**NOTICE OF SEMINAR COMPLETION  
EDCR 5.07**

16 Plaintiff, Devin Bryson Reed, hereby submits Exhibit 1, attached hereto, attesting to their  
17 completion of the Cooperative Parenting Course offered by the University of Nevada Las Vegas.

19 DATED this 11th day of July 2019.



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

APPX0442



July 11, 2019

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

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

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:

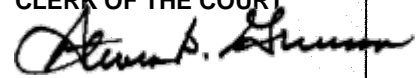
*Devin Bryson Reed*

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



EXHS

**HANRATTY LAW GROUP**

Kari J. Hanratty, Esq.  
State Bar of Nevada No. 7677  
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,

Plaintiff,

v.

AMANDA REED,

Defendant.

Case No: D-18-568055-D

Dept No: F

**EXHIBITS IN SUPPORT OF  
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**

Comes now Defendant, Amanda Reed, by and through her attorney of record, Kari J. Hanratty, Esq., of Hanratty Law Group, and submits her Exhibits in Support of 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.

EXHIBIT	BATE NUMBERS	DOCUMENT
A	Defendant 0001	Text message from Plaintiff to Lauralyn
B	Defendant 0002	Our Family Wizard Communication between parties dated April 29, 2019
C	Defendant 0003	Our Family Wizard Communication between the parties dated April 29, 2019

D	Defendant 0004	Our Family Wizard Communication between the parties dated May 18, 2019
E	Defendant 0005	Our Family Wizard Communication between the parties dated May 21, 2019
F	Defendant 0006 to 0013	Proposed Amended Counterclaim for Divorce

Dated this 25<sup>th</sup> day of July, 2019.

# **HANRATTY LAW GROUP**

By: \_\_\_\_\_

Carrie J. Primas, Esq.

Nevada Bar No. 12071

1815 Village Center Circle, Suite 140

Las Vegas, Nevada 89134

PH: (702) 821-1379

FAX: (702) 870-1846

Email: attorneys@hanrattylawgroup.com

Attorney for Amanda Reed

**EXHIBIT “A”**

**EXHIBIT “A”**

**EXHIBIT “A”**



Laurlyn (new) >

Our court order states I pick the babysitter and you transport to the babysitter I choose. You can go back in our court orders and search for it. My attorney sent your attorney a letter regarding this.

I have spoken with people who are close to La. They are also worried about her. There is more than Bert's domestic violence that is concerning. They also believe she has a drug addiction. Bert was her source for drugs and now since there is a protection order in place they feel she has turned to other sources to get her supply. I am sure they will testify to this if we need to go to court over La being the babysitter. I love her but I love our kids more. Please take this seriously. Our kids safety is what is important.

While you are at work and you are not willing to bring them to me, Crystal will watch them. You can drop them off at her house. Ty

Hahaha Hahaha!!!!!! Ever heard of defamation of character?? I am all for taking a drug test just to show u how stupid u r. I'm causing a rift? Take a look in the mirror. U r a nasty toxic person.



iMessage



**EXHIBIT “B”**

**EXHIBIT “B”**

**EXHIBIT “B”**



## View Message

To: Amanda Reed

(First View: 04/29/2019 09:36 PM)

RE: Girl Scouts

(Sent: 04/29/2019 09:18 PM)

Yes i would take her . What time is it? I have the coparenting classes on Tuesdays

On 04/29/2019 09:13 PM Amanda Reed wrote:

Abby has been attending Girl Scouts. I asked you about Girl Scouts a while ago with no response. There are 2 meetings in the month of May

Tue, May 7 and Tue May 21...they are your days. I did not plan an activity on your day. It happened to fall on your day. Would you be willing to take Abby? If not can I?



**EXHIBIT “C”**

**EXHIBIT “C”**

**EXHIBIT “C”**





## View Message

To: Amanda Reed

(First View: 04/29/2019 10:25 PM)

RE: Girl Scouts

(Sent: 04/29/2019 09:53 PM)

Ok ,you offered to take her ? I have no problem w that if we could meet after at Las on those Tuesdays i could prob be there at las same time as she finishes 7:45:750p? So she could just stay w you after school those Tuesdays until after ?

On 04/29/2019 09:44 PM Amanda Reed wrote:

You can decide how she participates. It is your day.

On 04/29/2019 09:38 PM Devin Reed wrote:

Yeah i have those classes until 730 idk . I totally want her to go and be part of it . If you want to work it out i will be open to it..

On 04/29/2019 09:36 PM Amanda Reed wrote:

6:30-7:30 at kitty ward

On 04/29/2019 09:18 PM Devin Reed wrote:



**EXHIBIT “D”**

**EXHIBIT “D”**

**EXHIBIT “D”**



## View Message

From: Devin Reed

To: Amanda Reed

(First View: 05/18/2019 09:31 AM)

RE: Parent meeting/dr shaffer

(Sent: 05/18/2019 09:26 AM)

None of it.

On 05/18/2019 09:19 AM Amanda Reed wrote:

There is a mandatory parent meeting for cheer on Monday. It's the same time as Dr. Shaffer. I emailed Dr. Shaffer and she said she has time before Girl Scouts on Tuesday if that works for you. I know you stated in OFW that I could take her to Girl Scouts on Tue. Are you still allowing this? If so I can take her to Dr. Shaffer on Tue and then straight to Girl Scouts after and straight to you after. Are you ok with this?



**EXHIBIT “E”**

**EXHIBIT “E”**

**EXHIBIT “E”**



## View Message

From: Devin Reed

To: Amanda Reed

(First View: 05/21/2019 01:07 PM)

RE: Girl Scouts 5/21

(Sent: 05/21/2019 11:45 AM)

please do not schedule events on my time

On 05/21/2019 10:39 AM Amanda Reed wrote:

Is Abby able to go to Girl Scouts tonight?

On 05/20/2019 09:56 PM Devin Reed wrote:

Why did you call my cousin and say His wife had an affair with Nick? What was the purpose of that call? why did you send my 92 year old grandma our drama videos and texts? Why did you call my job to get me laid off?

On 05/20/2019 09:44 PM Amanda Reed wrote:

You will be bringing her to Girl Scouts?

She has no fever. She has not had a fever all day. She has a sore throat. Her phone consultation says her only



**EXHIBIT “F”**

**EXHIBIT “F”**

**EXHIBIT “F”**

CTFM  
HANRATTY LAW GROUP  
Carrie J. Primas, Esq.  
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EMAIL: attorneys@hanrattylawgroup.com  
Attorneys for Defendant, Amanda Reed

DISTRICT COURT  
CLARK COUNTY, NEVADA

DEVIN REED,  
Plaintiff,

v.

AMANDA REED,  
Defendant

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

**FIRST AMENDED COUNTERCLAIM  
FOR DIVORCE**

COMES NOW Defendant, Amanda Reed, by and through her attorney of record, Carrie J. Primas, Esq., of Hanratty Law Group, and hereby files her First Amended Counterclaim for Divorce against Plaintiff/Counterdefendant, Devin Reed, as follows:

1. Defendant/Counterclaimant is and, for a period of more than six weeks immediately preceding the filing of this Counterclaim, has been an actual bona fide resident of the State of Nevada and actually, physically and corporeally domiciled herein during all of said period of time.

2. Defendant/Counterclaimant and Plaintiff/Counterdefendant were duly and lawfully married in Las Vegas Nevada on October 2nd, 2010.

3. There are two minor children born the issue of this marriage, to wit: ABIGAIL REED, born April 6, 2013; and SHAWN REED, born July 3, 2015.

4. The parties hereto should be awarded joint legal custody of the minor child, with DEFENDANT/Counterclaimant having primary physical custody and PLAINTIFF

1 /Counterdefendant having rights of visitation. With supervised visitation occurring the first and  
2 third weekends of each month. Defendant is to have the children from 9 AM until 6 PM on  
3 Saturdays and 8 AM to 5 PM on Sundays. There is to be no overnight visitation until the  
4 PLAINTIFF/Counterdefendant can demonstrate he is drug free. However, no visitation will be  
5 ordered until the PLAINTIFF/Counterdefendant completes the cope class.

6 5. PLAINTIFF/Counterdefendant should provide the statutory sum of 25% of his  
7 gross monthly wages per month, for support of the minor children until the minor children  
8 graduate high school or reach the age of majority, whichever is greater.  
9 DEFENDANT/Counterclaimant AMANDA REED will claim the minor children as a tax  
10 deduction with the I.R.S. every year until the minor children reach the age of 18.

11 6. That both Plaintiff and Defendant shall maintain a policy of medical insurance  
12 benefits for the minor children. Any expenses pertaining to medical treatment and care of the  
13 minor children not covered by health insurance is to be split equally between the parties until the  
14 children reach the age of majority, subject to the 30/30 rule.

15 7. There is community property of the parties that is to be divided between the parties  
16 as set forth below:

17 DEFENDANT/Counterclaimant AMANDA REED will keep the following property as  
18 her sole and separate property:

- 19 (a) The Residence located at 4416 Cinderwood Ct., North Las Vegas, NV 89032;  
20 (b) 2008 Ford Expedition;  
21 (c) An equitable and equal split of all pension and retirement accounts;  
22 (d) Half of the equity of the 2002 Ford Motorhome;  
23 (e) All property currently in her possession.

24 PLAINTIFF/Counterdefendant DEVIN REED will keep the following as his sole and  
25 separate property:

- 26 (a) 2015 Dodge truck. To be Financed in DEVIN REED's name within 30  
27 days. If Mr. REED cannot finance the truck in his name, AMANDA REED agrees  
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to continue to have the truck in her name provided that DEVIN REED makes timely payments on the vehicle, keeps the vehicle insured and gives AMANDA REED the spare key. Should DEVIN REED miss ONE (1) payment, AMANDA REED will have the full right to repossess the vehicle and sell it. Any deficiency from the sale of the vehicle shall be DEVIN REED's separate debt.

- (b) 2002 Ford Motorhome, after paying AMANDA REED half the equity;
- (c) An equitable and equal split of all pension and retirement accounts;
- (d) All property currently in his possession.

8. There are community debts of the parties that is to be divided between the parties as set forth below:

DEFENDANT/Counterclaimant AMANDA REED will keep the following debt as her sole and separate debt:

- (a) The Mortgage on the residence located at 4416 Cinderwood Ct., North Las Vegas, NV 89032;
- (b) Half of the credit card debt in the parties' names:
  - 1. Disney Chase \$8,578.47;
  - 2. Chase Slate \$3,399;
  - 3. Discover \$5,257.22;
  - 4. Lowe's \$3,920.34;
  - 5. Care Credit \$7,900.00;
  - 6. Navient St. Loans \$6,355.11.
- (c) An equitable and equal split of the medical expenses that the parties' owe for Shawn Reed to Shadow Emergency physicians in the amount of \$1,329.00 an Desert Valley Pediatrics in the amount of \$12.99.

PLAINTIFF/Counterdefendant DEVIN REED will keep the following as his sole and separate debt:

- (a) The amount owing on the 2015 Dodge truck. To be Financed in DEVIN REED's

1 name within 30 days. If Mr. REED cannot finance the truck in his name,  
2 AMANDA REED agrees to continue to have the truck in her name provided that  
3 DEVIN REED makes timely payments on the vehicle, keeps the vehicle insured  
4 and gives AMANDA REED the spare key. Should DEVIN REED miss ONE (1)  
5 payment, AMANDA REED will have the full right to repossess the vehicle and  
6 sell it. Any deficiency from the sale of the vehicle shall be DEVIN REED's  
7 separate debt.

8 (b) Half of the credit card debt in the parties' names:

- 9 1. Disney Chase \$8,578.47;  
10 2. Chase Slate \$3,399;  
11 3. Discover \$5,257.22;  
12 4. Lowe's \$3,920.34;  
13 5. Care Credit \$7,900.00;  
14 6. Navient St. Loans \$6,355.11.

15 (c) An equitable and equal split of the medical expenses that the parties' owe for  
16 Shawn Reed to Shadow Emergency physicians in the amount of \$1,329.00 and  
17 Desert Valley Pediatrics in the amount of \$12.99.

18 9. PLAINTIFF/Counterdefendant shall pay DEFENDANT/Counterclaimant's  
19 reasonable attorney's fees and costs incurred herein.

20 10. That DEFENDANT/Counterclaimant does desire restoration of her former name.

21 11. The parties hereto are incompatible in marriage.

22 COUNTERCLAIMS FOR INTENTIONAL TORTS

23 I.

24 ASSAULT AND BATTERY

25 12. Amanda restates the allegations as fully set forth in Paragraphs 1 through 11 above  
26 as if fully set forth and incorporated hereby by reference.

27 13. Devin intentionally and knowingly threatened and touched Amanda, by advancing  
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1 upon Amanda in an aggressive, forceful and threatening manner, without Amanda's consent,  
2 which placed Amanda in fear or apprehension of imminent bodily injury.

3 14. Devin physically contacted Amanda by moving menacingly towards her and  
4 making contact with her person with injurious and offensive touching.

5 15. As a direct and proximate result of Devin's conduct, Amanda suffered physical  
6 pain and mental anguish from the time of the incidents to the present and will continue to suffer  
7 in the future, all to Amanda's damage in an amount in excess of the minimum jurisdictional limits  
8 of this Court, or \$10,000.00.

9 16. In addition to general damages in an amount according to proof, the  
10 aforementioned conduct of Devin, was willful and intentional misconduct, thereby depriving  
11 Amanda of her legal rights or otherwise causing injury, and was despicable conduct that subjected  
12 Amanda to a cruel and unjust hardship in conscious disregard of Amanda's rights, so as to justify  
13 an award of exemplary and punitive damages in an amount according to proof.

14 II.  
15 RAPE

16 17. Amanda restates the admissions, denials and allegations as fully set forth in  
17 Paragraphs 1 through 16 above as if fully set forth and incorporated herein by reference.

18 18. Devin subjected Amanda to sexual penetration, and/or forced Amanda to make a  
19 sexual penetration on himself, against the will and consent of Amanda and/or under conditions in  
20 which the Devin knows or should know that Amanda was mentally and I or physically incapable  
21 of resisting or understanding the nature of his conduct.

22 19. As a direct and proximate result of Devin's conduct, Amanda suffered physical  
23 pain and mental anguish from the time of the incidents to the present and will continue to suffer  
24 in the future, all to Amanda's damage in an amount in excess of the minimum jurisdictional limits  
25 of this Court, or \$10,000.00.

26 20. In addition to general damages in an amount according to proof, the  
27 aforementioned conduct of Devin, was willful and intentional misconduct, thereby depriving  
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1 Amanda of her legal rights or otherwise causing injury, and was despicable conduct that subjected  
2 Amanda to a cruel and unjust hardship in conscious disregard of Amanda's rights, so as to justify  
3 an award of exemplary and punitive damages in an amount according to proof.

4 III.

5 FALSE IMPRISONMENT

6 21. Amanda restates the admissions, denials and allegations as fully set forth in  
7 Paragraphs 1 through 20 above as if fully set forth and incorporated herein by reference.

8 22. That Devin intentionally and knowingly physically restrained Amanda, against her  
9 will and without her consent, in order to control her actions and facilitate his acts of battery, rape  
10 and false imprisonment.

11 23. That Devin disclosed that he was going to continue his unlawful act(s) until he was  
12 satisfied.

13 24. As a direct and proximate result of Devin's conduct, Amanda suffered physical  
14 pain and mental anguish from the time of the incidents to the present and will continue to suffer  
15 in the future, all to Amanda's damage in an amount in excess of the minimum jurisdictional limits  
16 of this Court, or \$10,000.00.

17 25. In addition to general damages in an amount according to proof, the  
18 aforementioned conduct of Devin, was willful and intentional misconduct, thereby depriving  
19 Amanda of her legal rights or otherwise causing injury, and was despicable conduct that subjected  
20 Amanda to a cruel and unjust hardship in conscious disregard of Amanda's rights, so as to justify  
21 an award of exemplary and punitive damages in an amount according to proof.

22 IV.

23 INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

24 26. Amanda restates the admissions, denials and allegations as fully set forth in  
25 Paragraphs 1 through 25 above as if fully set forth and incorporated herein by reference.

26 27. That Devin intentionally and knowingly inflicting emotional distress on Amanda,  
27 against her will and without her consent, in order to control her actions and facilitate his acts of  
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1 battery, rape and false imprisonment.

2 28. Devin negligently and carelessly caused Amanda to suffer emotional distress as a  
3 direct and proximate result of the aforementioned acts and omissions.

4 29. As a direct and proximate result of Devin's conduct, Amanda has suffered pain and  
5 suffering, and a loss of enjoyment of life from the time of the incidents to the present and will  
6 continue to suffer in the future, all to Amanda's damage in an amount in excess of the minimum  
7 jurisdictional limits of this Court, or \$10,000.00.

8 30. In addition to general damages in an amount according to proof, the  
9 aforementioned conduct of Devin, was willful and intentional misconduct, thereby depriving  
10 Amanda of her legal rights or otherwise causing injury, and was despicable conduct that subjected  
11 Amanda to a cruel and unjust hardship in conscious disregard of Amanda's rights, so as to justify  
12 an award of exemplary and punitive damages in an amount according to proof.

13 V.

14 NEGLIGENCE INFLICTION OF EMOTIONAL DISTRESS

15 31. Amanda restates the admissions, denials and allegations as fully set forth in  
16 Paragraphs 1 through 30 above as if fully set forth and incorporated herein by reference.

17 32. The aforementioned acts and omissions of Devin constitute the duties of Devin  
18 and breaches of those duties by Devin as well as an injury negligently inflicted upon Amanda.

19 33. Devin negligently and carelessly caused Amanda to suffer emotional distress as a  
20 direct and proximate result of the aforementioned acts and omissions.

21 34. As a direct and proximate result of Devin's conduct, Amanda has suffered pain and  
22 suffering, and a loss of enjoyment of life, from the time of the incidents to the present and will  
23 continue to suffer in the future, all to Amanda's damage in an amount in excess of the minimum  
24 jurisdictional limits of this Court, or \$10,000.00.

25 35. In addition to general damages in an amount according to proof, the  
26 aforementioned conduct of Devin, was willful and intentional misconduct, thereby depriving  
27 Amanda of her legal rights or otherwise causing injury, and was despicable conduct that subjected  
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1 Amanda to a cruel and unjust hardship in conscious disregard of Amanda's rights, so as to justify  
2 an award of exemplary and punitive damages in an amount according to proof.

3 WHEREFORE, Defendant prays for judgment as follows:

- 4 1. That Plaintiff's Complaint for Divorce be dismissed and he take nothing thereby;  
5 2. That Defendant/Counterclaimant be awarded relief as set forth in her First  
6 Amended Counterclaim for Divorce herein;

- 7 3. For general damages in excess of Ten Thousand Dollars (\$10,000);  
8 4. For punitive damages in excess of Ten Thousand Dollars (\$10,000);  
9 5. For an unequal distribution of community assets;  
10 6. For attorney's fees and costs incurred;  
11 7. For other such relief as the Court deems just and equitable.

12 DATED this \_\_\_\_\_ day of July, 2019.

13  
14 Submitted By:

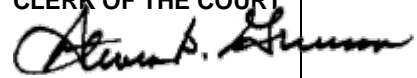
15 **HANRATTY LAW GROUP**

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17  
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24 Attorneys for Defendant, Amanda Reed  
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27  
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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\*\*\*\*

Electronically Filed  
7/25/2019 4:19 PM  
Steven D. Grierson  
CLERK OF THE COURT



Devin Bryson Reed, Plaintiff  
vs.  
Amanda Raelene Reed, Defendant.

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

**NOTICE OF HEARING**

Please be advised that the Defendant's Notice of Motion and 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 in the above-entitled matter is set for hearing as follows:

**Date:** August 27, 2019  
**Time:** 2:30 PM  
**Location:** Courtroom 03  
Family Courts and Services Center  
601 N. Pecos Road  
Las Vegas, NV 89101

**NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.**

STEVEN D. GRIERSON, CEO/Clerk of the Court

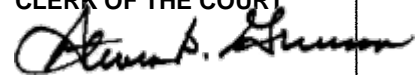
By: /s/ Desiree Darris  
Deputy Clerk of the Court

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Desiree Darris  
Deputy Clerk of the Court

APPX0465



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EMAIL: attorneys@hanrattylawgroup.com  
Attorneys for Defendant, Amanda Reed

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

DEVIN REED,  
Plaintiff,

v.

AMANDA REED,  
Defendant.

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

**NOTICE OF MOTION AND  
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**

Date of Hearing:  
Time of Hearing:

**Oral Argument Requested: YES**

TO: Plaintiff, Devin Reed, and his attorney of record, Louis C. Schneider,  
Esq.

YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS  
MOTION WITH THE CLERK OF THE COURT AND TO PROVIDE THE  
UNDER-SIGNED WITH A COPY OF YOUR RESPONSE WITHIN FOURTEEN  
(14) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A  
WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN  
FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION MAY