

1 established for the purposes of the action in accordance with the
2 claim of the party obtaining the order;

3 (B) An order refusing to allow the disobedient party to support
4 or oppose designated claims or defenses, or prohibiting that
5 party from introducing designated matters in the action. Jan 10, 2022, 10:51 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

6 (C) An order striking out pleadings or parts thereof, or staying
7 further proceedings until the order is obeyed, or dismissing the
8 action or proceeding or any part thereof, or rendering a
9 judgment by default against the disobedient party;

10 (D) In lieu of any of the foregoing orders or in addition thereto,
11 an order treating as a contempt of court the failure to obey any
12 orders except an order to submit to a physical or mental
13 examination;

14 (E) Where a party has failed to comply with an order under Rule
15 35(a) requiring that party to produce another for examination,
16 such orders as are listed in subparagraphs (A), (B), and (C) of
17 this subdivision, unless the party failing to comply shows that
18 that party is unable to produce such person for examination.

19 In lieu of any of the foregoing orders or in addition thereto, the court shall
20 require the party failing to obey the order or the attorney advising him or
21 both to pay the reasonable expenses, including attorney's fees, caused by the
22 failure, unless the court finds that the failure was substantially justified or
23 that other circumstances make an award of expenses unjust.

24 (d) Failure of Party to Attend at Own Deposition or Serve Answers to
25 Interrogatories or Respond to Request for Inspection. If a party or an officer,
26 director, or managing agent of a party or a person designated under Rule
27 30(b)(6) or 31(a) to testify on behalf of a party fails (1) to appear before the
28 officer who is to take the deposition, after being served with a proper notice,
or (2) to serve answers or objections to interrogatories submitted under Rule
33, after proper service of the interrogatories, or (3) to serve a written
response to a request for inspection submitted under Rule 34, after proper
service of the request, the court in which the action is pending on motion
may make such orders in regard to the failure as are just, and among others it
may take any action authorized under subparagraphs (A), (B), and (C) of
subdivision (b)(2) of this rule. Any motion specifying a failure under clause
(2) or (3) of this subdivision shall include a certification that the movant has

1 in good faith conferred or attempted to confer with the party failing to answer
2 or respond in an effort to obtain such answer or response without court
3 action. In lieu of any order or in addition thereto, the court shall require the
4 party failing to act or the attorney advising that party or both to pay the
5 reasonable expenses, including attorney's fees, caused by the failure, unless
the court finds that the failure was substantially justified or that other
circumstances make an award of expenses unjust.

6 The failure to act described in this subdivision may not be excused on the
7 ground that the discovery sought is objectionable unless the party failing to
8 act has applied for a protective order as provided by Rule 26(c).

9 The documents and responses to interrogatories are imperative to this case as
10 Plaintiff was the primary income producer for the family. Plaintiff now asserts that
11 he is unemployed, or may be newly employed (unknown). The information that is
12 imperative to divide assets, debts, resolve alimony and most notably determine
13 child support has not been provided by Plaintiff. Defendant is unable to proceed
14 with trial absent the above noted discovery.
15

16
17 B. Amanda's request for attorney fees and costs should be granted.

18 The Court is authorized to award fees pursuant to EDCR 7.60(b), which
19 states:

20
21 (b) The court may, after notice and an opportunity to be heard, impose upon
22 an attorney or a party any and all sanctions which may, under the facts of the
case, be reasonable, including the imposition of fines, costs or attorney's fees
when an attorney or a party without just cause:

23 (1) Presents to the court a motion or an opposition to a motion which
24 is obviously frivolous, unnecessary or unwarranted.

25 (2) Fails to prepare for a presentation.

26 (3) So multiplies the proceedings in a case as to increase costs
unreasonably and
vexatiously.

27 (4) Fails or refuses to comply with these rules.

28 (5) Fails or refuses to comply with any order of a judge of the court.

1 Devin has caused Amanda to incur legal fees by based upon his conduct.
2
3 Amanda respectfully requests an award of attorney's fees consistent with the actual
4 fees incurred by her in preparing this Motion, in preparing any Reply that may be
5 necessary, and in appearing at the hearing on this matter.
6

7 Amanda is also entitled to attorney's fees pursuant to NRS 18.010, which
8 states in relevant part as follows:
9

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

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

16 (a) When he has not recovered more than \$20,000; or

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

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

Amanda's request for fees is reasonable under the factors the Court must

1 consider under *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31
2 (1969), specifically:

3
4 Qualities of the advocate;
5 Character and difficulty of work performed;
6 Work actually performed; and
7 Result obtained.

8 Undersigned Counsel offers that she regularly practices in the area of family
9 law and has regularly practiced in the area of family law since licensing in 2001
10 and remains in good standing. Undersigned Counsel takes the amount of required
11 Continuing Legal Education Courses each year. Therefore, Undersigned Counsel
12 possesses the qualities of an advocate contemplated in *Brunzell*.

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III.

Conclusion

Bases upon the foregoing, Defendant requests the Court enter an order directing Plaintiff to respond to Defendant's First Set of Interrogatories and Defendant's First Request for Production of Documents. Further, Defendant requests this Court to order Plaintiff to pay for all attorney fees related to this Motion pursuant to a Memorandum of Fees and Costs.

Dated this 12th day of August, 2019.

HANRATTY LAW GROUP

By: _____

Kari J. Hanratty, Esq.

Nevada Bar No. 7677

1815 Village Center Circle, Suite 140

Las Vegas, Nevada 89134

Phone: (702) 821-1379

Fax: (702) 870-1846

Email: attorneys@hanrattylawgroup.com

Attorney for Defendant, Amanda Reed

AFFIDAVIT OF KARI J. HANRATTY, ESQ.

STATE OF NEVADA)

ss

County of Clark)


1. I, Kari J. Hanratty, Esq., counsel for Defendant in the above referenced matter have read the Motion to Compel Discovery Responses, and attest to the below reference facts as being true and correct to the best my knowledge.

2. On May 10, 2019, Defendant, Amanda Reed ("Amanda"), by and through counsel, served discovery on Counsel for Plaintiff, Devin Reed ("Devin"), in the form of Defendant's First Set of Interrogatories, and Defendant's First Request for Production of Documents. Said discovery was due on or before June 10, 2019. On June 10, 2019, Plaintiff, through counsel, served on Defendant's counsel his responses to each of Defendant's discovery requests referenced above. However, those responses were extremely deficient, as outlined in further detail herein above.


3. On July 31, 2019, undersigned counsel sent a letter to Devin, by and through Counsel, pursuant to EDCR 2.34, outlining the deficiencies in the responses and requesting a discovery dispute conference via telephone on August 7, 2019, at 10:00 a.m. The letter also stated that Devin's counsel could contact counsel's office to set up a different time for the discovery dispute conference if this time was not convenient. No discovery dispute took place. The undersigned

1 counsel attempted to contact Devin's attorney on two additional occasions to
2 address the issues; however, the undersigned counsel did not receive a response.

3
4 FURTHER YOUR AFFIANT SAYETH NAUGHT.

5
6
7 
Kari J. Hanratty, Esq.

8 Subscribed and Sworn to before me this
9 12th day of August, 2019.

10
11 
12 Notary Public in and for said County
And State



MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

DEVIN REED
Plaintiff/Petitioner
v.
AMANDA REED
Defendant/Respondent

Case No. D-18-568055-D

Dept. F

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

Notice: Motions and Oppositions filed after entry of a final order issued pursuant to NRS 125, 125B or 125C are subject to the reopen filing fee of \$25, unless specifically excluded by NRS 19.0312. Additionally, Motions and Oppositions filed in cases initiated by joint petition may be subject to an additional filing fee of \$129 or \$57 in accordance with Senate Bill 388 of the 2015 Legislative Session.

Step 1. Select either the \$25 or \$0 filing fee in the box below.

- ☐ **\$25** The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
-OR-
☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
☒ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
☐ The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on _____.
☐ Other Excluded Motion (must specify) _____.

Step 2. Select the \$0, \$129 or \$57 filing fee in the box below.

- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
☒ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
☐ The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
-OR-
☐ **\$129** The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.
-OR-
☐ **\$57** The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

Step 3. Add the filing fees from Step 1 and Step 2.

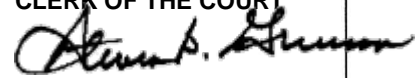
The total filing fee for the motion/opposition I am filing with this form is:

☐ \$0 ☐ \$25 ☐ \$57 ☐ \$82 ☐ \$129 ☐ \$154

Party filing Motion/Opposition: Defendant Date 8/12/19

Signature of Party or Preparer Kari Collins

APPX0514



1 **EXHS**
2 **HANRATTY LAW GROUP**
3 Kari J. Hanratty, Esq.
4 State Bar of Nevada No. 7677
5 1815 Village Center Circle, Suite 140
6 Las Vegas, Nevada 89134
7 PH: (702) 821-1379
8 FAX: (702) 870-1846
9 EMAIL: attorneys@hanrattylawgroup.com
10 Attorneys for Defendant, Amanda Reed

11
12 **DISTRICT COURT**
13 **CLARK COUNTY, NEVADA**

14 DEVIN REED,
15
16 Plaintiff,

17 v.

18 AMANDA REED,
19
20 Defendant.

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

) **EXHIBITS IN SUPPORT OF**
) **DEFENDANT'S MOTION TO**
) **COMPEL DISCOVERY**
) **PURSUANT TO NRCP 37**

21
22 Comes now Defendant, Amanda Reed, by and through her attorney of
23 record, Kari J. Hanratty, Esq., of Hanratty Law Group, and submits her Exhibits in
24 Support of Defendant's Motion to Compel Discovery Pursuant to NRCP 37.

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EXHIBIT	BATE NUMBERS	DOCUMENT
A	Defendant 0001 to 0011	Defendant's First Set of Interrogatories
B	Defendant 0012 to 0018	Defendant's First Request for Production of Documents
C	Defendant 0019	Receipt of Copy

Dated this 12th day of August, 2019.

HANRATTY LAW GROUP



By: _____
 Kari J. Hanratty, Esq.
 Nevada Bar No. 7677
 1815 Village Center Circle, Suite 140
 Las Vegas, Nevada 89134
 PH: (702) 821-1379
 FAX: (702) 870-1846
 Email: attorneys@hanrattylawgroup.com
 Attorney for Defendant, Amanda Reed

EXHIBIT “A”

EXHIBIT “A”

EXHIBIT “A”

INTR
HANRATTY LAW GROUP
Carrie J. Primas, Esq.
State Bar of Nevada No. 12071
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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,)	
)	
v.)	DEFENDANT'S FIRST SET OF
)	INTERROGATORIES PROPOUNDED
AMANDA REED,)	ON PLAINTIFF
)	
Defendant.)	

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

Pursuant to Rule 33 of Nevada Rule of Civil Procedure, Defendant, Amanda Reed, by and through her attorney of record, Carrie J. Primas, Esq., of Hanratty Law Group, hereby requests Plaintiff, Devin Reed, respond to Defendant's First Set of Interrogatories. Pursuant to said rule, Plaintiff is required to respond to Defendant's First Set of Interrogatories within thirty (30) days of service of the request.

DEFINITIONS AND INSTRUCTIONS

1. Information sought in these Interrogatories shall include information within the knowledge, possession, control or access of any agent, employee, attorney, or investigator (including investigators of an attorney) of Plaintiff, or any person acting as Plaintiff's representative or on behalf of Plaintiff including, but not limited to, any otherwise independent attorney, agent or investigator.

\\

1 2. The words "YOU" and "YOUR" means you, your representatives, agents,
2 insurers, attorneys, employees, directors, officers, subsidiaries, affiliates and all others over whom
3 you have control.

4 3. Whenever appropriate, the singular form of a word shall be interpreted as plural, and
5 the masculine gender shall be deemed to include the feminine.

6 4. As used in these Interrogatories, the term "AND" as well as "OR" shall be construed
7 either disjunctively or conjunctively, as necessary, to bring within the scope of these Interrogatories
8 any information which might otherwise be construed to be outside their scope.

9 5. As used in these Interrogatories, the term "DATE" means the exact day, month, and
10 year, if known or, if not known, your best approximation thereof. Exact dates shall be given in all
11 answers except where it is explicitly indicated that an approximate date may be given.

12 6. As used in these Interrogatories, the term "PERSON" includes, without limiting the
13 generality of its meaning, every natural person, corporate entity, partnership, association,
14 governmental body or agency.

15 7. As used in these Interrogatories, identification of a person or entity includes stating
16 his, her or its full name, his or her most recent home address and telephone number, his, her or its most
17 recent known business address and telephone number, his or her present position, and his, her or its
18 prior connection or association with any party to this litigation.

19 8. As used in these Interrogatories, the term "DOCUMENT" includes, without limiting
20 the generality of its meaning, all originals or copies, where originals are unavailable, and no
21 identical copies (whether different from originals by reason of notation made on such copies or
22 otherwise) of all written, recorded or graphic matter, however produced or reproduced, whether or
23 not now in existence, or correspondence, telegrams, notes or sound recordings of any type of
24 conversation, meeting or conference, minutes of meetings, memoranda, interoffice communications,
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1 studies, analyses, reports, summaries and results of investigations and tests, reviews, contracts,
2 agreements, working papers, tax returns, statistical records, ledgers, books of account, vouchers,
3 bank checks, bank statements, invoices, receipts, computer data, stenographers' notebooks, manuals,
4 directives, bulletins, desk calendars, appointment books, diaries, maps, charts, photographs, plats,
5 drawings, or other graphic representations, logs, investigator's reports, or papers similar to any of the
6 foregoing, however denominated.
7

8 9. As used in these Interrogatories, identification of a document includes stating (a) the
9 nature of the document; (b) the date, if any, appearing thereon; (c) the date, if known on which the
10 document was prepared; (d) the title of the document; (e) the general subject matter of the document; (f)
11 the number of pages comprising the document; (g) the identity of each person who wrote, dictated, or
12 otherwise participated in the preparation of the document; (h) the identity of each person who signed or
13 initialed the document; (i) the identity of each person to whom the document was addressed; (j) the
14 identity of each person who received the document or reviewed it; (k) the location of the document; and
15 (1) the identity of each person having custody of the document. Identification of a document includes
16 identifying all documents known or believed to exist, whether or not in your custody or in the custody of
17 your attorneys.
18

19 In all Interrogatories requesting the identification of documents, you are requested to state
20 whether you will make such documents available for inspection and copying by stating "available"; if
21 you are unwilling or unable to produce such documents, you are requested to so indicate by stating "not
22 available" and state the reasons therefore.

23 NOTE, however, that where you are requested herein to attach a copy of a document to your
24 Answers to Interrogatories, this is to be deemed a request for production which can only be satisfied by
25 producing the document requested.
26

27 \\\

1 10. If you at any time had possession or control of a document called for under this
2 request and if such document has been lost, destroyed, purged, or is not presently in your
3 possession or control, you shall describe the document, the date of its loss, destruction, purge, or
4 separation from possession or control, and the circumstances surrounding its loss, destruction,
5 purge, or separation from possession or control.

6 11. With respect to the identification of documents, identify all documents which
7 relate to these documents and all persons who have knowledge of these documents.
8

9 12. In each case wherein you are asked to "STATE THE BASIS" of an identified
10 contention, allegation, denial or statement, provide the following information:

- 11 (a) Every fact upon which the contention, denial, allegation or statement is
12 based;
- 13 (b) The source of said facts;
- 14 (c) The identity of each person having knowledge of said facts;
- 15 (d) As to each such person, the substance of his knowledge;
- 16 (e) The identity of each document concerning, commenting on or relating to
17 said facts;
- 18 (f) The identity of each communication concerning, commenting on or relating
19 to said facts.

20 13. As used in these Interrogatories, the term "COMMUNICATION" means any
21 contact, oral or written, formal or informal, at any time or place and under any circumstances
22 whatsoever, whereby information of any nature was transmitted or transferred.

23 14. As used in these Interrogatories, identification of a communication includes stating
24 (a) the date and place of the communication; (b) the identity of each person who was present at,
25 participated in, or has knowledge of the communication; (c) the type of communication (e.g., oral
26 or written); (d) the substance of the communication; and (e) the identity of each document
27 reflecting or comprising the communication.

1 15. If any of the information contained in the Answers to these Interrogatories is not
2 within your personal knowledge, so state. The Answers to these Interrogatories should identify
3 every person, document, and communication upon which you rely for the information contained
4 in the Answer not based solely on your personal knowledge.

5 16. If you cannot answer any portion of any of the following Interrogatories in full,
6 after exercising diligence to secure the information to do so, so state and answer to the extent
7 possible, specifying your inability to answer the remainder and stating whatever information or
8 knowledge you have concerning the unanswered portions.

9 17. If you claim privilege as to any communication as to which information is
10 requested by these Interrogatories, specify the privilege claimed, the communication and/or
11 answer as to which that claim is made, the parties to the communication, the topic discussed in
12 the communication and the basis for your claim.

13 18. These Interrogatories are continuing Interrogatories and require supplemental answers
14 if you obtain further information with respect to the same between the date your answers are served and
15 the entry of judgment.
16

17 **INTERROGATORIES**

18 **INTERROGATORY NO. 1:**

19 Identify your full name and each name you have utilized since birth, your social security
20 number, and date of birth.

21 **INTERROGATORY NO. 2:**

22 Please provide your highest level of education attained including: name of the institution,
23 years matriculated, whether or not you graduated, and the name of your degree, if any. If you
24 have obtained professional licensing or training of any kind, please provide the type of training
25 received; the institution attended; the type license obtained, if any; the issuing entity; and whether
26
27
28

1 or not any license received is current.

2 **INTERROGATORY NO. 3:**

3 Please provide a complete employment history from October 1, 2010, to the date of your
4 answers to these Interrogatories, including the name of the employer, your position, employment
5 dates, your rate of pay, and why you left that employment.
6

7 **INTERROGATORY NO. 4:**

8 Identify any all other sources of income or monies you receive on a monthly basis,
9 quarterly or yearly basis and with regards to same, identify the following:

- 10 1. The name, address and telephone number of the entity or person from which you
11 receive the income/monies;
- 12 2. The frequency of the receipt of income/monies;
- 13 3. Where the money is deposited; and
- 14 4. The amount of the income or money received.
15

16 **INTERROGATORY NO. 5:**

17 Itemize each and every one of your monthly obligations and with regards to same, identify
18 the following:

- 19 1. The entity to which the obligation is paid;
- 20 2. The amount of the payment; and
- 21 3. The source of income you are utilizing to pay the expense.
22

23 **INTERROGATORY NO. 6:**

24 Identify any and all checking, savings, investment, or any other type of financial account,
25 whether or not in your sole name, from the date of the marriage to the date of your answers to
26 these Interrogatories, in which you have or have had an interest, and for each account please
27
28

1 identify:

- 2 a. The name(s) in which the account is/was held;
- 3 b. The name, address and telephone number of institutions in which the account is
- 4 held;
- 5 c. The type of account (i.e. checking, savings, investment, or other financial
- 6 account);
- 7 d. The account number;
- 8 e. The date the account was opened and/or closed;
- 9 f. The source of all funds deposited into that account; and
- 10 g. The current balance of the account.

11 **INTERROGATORY NO. 7:**

12 Identify each and every credit card, line of credit, or note which is currently held or has
13 been held from the date of marriage to the date of your answers to these interrogatories either in
14 your name individually or jointly with Plaintiff or any other individual, and for each account
15 please identify:

- 16 a. The name, address and phone number of the credit card issuer;
- 17 b. The account number of each credit card;
- 18 c. The current amount of debt;
- 19 d. The reason for the debt; and
- 20 e. The date the debt was incurred.

21 **INTERROGATORY NO. 8:**

22 Apart from the credit card(s) identified in your response to Interrogatory No. 7, please
23 identify all other debts or financial obligations incurred by you during the marriage and which
24 are currently unpaid, (e.g., mortgages, car loans, leases, student loans, personal loans,
25 promissory notes, etc.) and please provide the following information:
26
27
28

- 1 a. The name and address of the creditor;
- 2 b. The basis for the debt or obligation;
- 3 b. The amount of the original obligation;
- 4 c. The present unpaid balance of the obligation; and
- 5 d. Any collateral securing the obligation.

6 **INTERROGATORY NO. 9:**

7 Identify all income received from the date of marriage to the date of your answers to these

8 Interrogatories, including the source of the income, the amount received each month, and the

9 account into which the income was deposited.

10 **INTERROGATORY NO. 10:**

11 Please identify all retirement plans, pension plans, retirement savings, IRA'S, deferred

12 compensation, 401k plans and/or other related benefit plans or accounts in which you are a

13 member, participant, and/or beneficiary, and for each such retirement plan, please provide the

14 following information:

- 15 a. The name, address and telephone number of the plan administrator/institution;
- 16 b. The account number, member number or other identifying number;
- 17 c. The current value and/or balance of each retirement plan;
- 18 d. The value and/or balance of each plan as of the date of the marriage; and
- 19 e. The current balance of any loan owed on the account or plan.

20 **INTERROGATORY NO. 11:**

21 Identify all items of real and personal property, tangible or intangible, which you contend

22 are community property, and state your proposed division for the same.

23 **INTERROGATORY NO. 12:**

24 Identify all items of real and personal property, tangible or intangible, which you contend

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are your separate property, and state your basis for that claim.

INTERROGATORY NO. 13:

For any life insurance policy of which you are the owner, either solely or with another individual, please state the following:

- a. The company with which the policy is held;
- b. The date the policy was purchased and/or opened;
- c. Whether the policy is a term or whole life policy;
- d. If the policy has a cash value, the cash value of the policy;
- e. The owner of the policy;
- f. The beneficiary(s) of the policy; and
- g. The policy number.

INTERROGATORY NO. 14:

Identify the Kelly Blue Book value for the vehicle in which you currently have an interest.

INTERROGATORY NO. 15:

Identify the source of funds used to purchase the toy hauler and children's ATV's you have purchased since your separation from Plaintiff.

INTERROGATORY NO. 16:

Please indicate the value of each of the following items:

1. DX – 9 drone controller
2. 1/6 scale RC road rally truck
3. Drone
4. Four (4) large RC planes
5. One (1) medium RC plane
6. Blade RC helicopter
7. Virtual reality headgear for drone
8. 1/10 scale RC dirt car
9. 2.7 ft.³ LG fridge
10. VCR 1000 cockpit simulator

- 1 11. Electronic drum set
- 2 12. Six (6) guitars with cases various types.
- 3 13. Two (2) studio speakers with stands
- 4 14. Two (2) Marshall amplifiers
- 5 15. Two (2) drum pedals
- 6 16. Sanyo overhead projector
- 7 17. 1 Ton Service Van
- 8 18. Champion 3400 W RV ready inverter
- 9 19. Dewalt HD 200 psi compressor
- 10 20. Kubach 6.5 gallon wet dry vac
- 11 21. Ridgid 16 gallon wet dry vac
- 12 22. Honda GVC 190 gas pressure washer
- 13 23. Pro Lift 2 1/2 ton hydraulic jack
- 14 24. Greenlee storage box 2448-23733
- 15 25. 3-piece craftsman rolling toolbox and tools
- 16 26. Dewalt 18 volt 3/8 NiCD cordless drill
- 17 27. 18 volt Dewalt 3/8 cordless drill
- 18 28. 18 volt Dewalt reciprocating saw
- 19 29. 12 volt Dewalt 3/8 cordless drill
- 20 30. 1/2' Dewalt corded drill
- 21 31. Werner 18' aluminum ladder
- 22 32. 4' aluminum ladder
- 23 33. 6' aluminum ladder
- 24 34. 21' aluminum ladder
- 25 35. 6' aluminum ladder
- 26 36. 6' fiberglass ladder
- 27 37. Laser Trac leveling system
- 28 38. Graco Truecoat 18v cordless paint sprayer
39. Video gaming chair
40. Burner Coleman stove
41. Propane heater single tank top
42. Ladies high altitude sleeping bag
43. Three (3) bass pro qualifier 2 casting rod
44. Three (3) bass pro qualifier 2 Baitcast Reel
45. Four (4) camping Chairs
46. Osprey Hikelite 18 hiking backpack
47. Coleman catalytic heater
48. Cooler – Cabela's polar Equalizer 40 quart
49. Burton bindings
50. Burton Snowboard
51. Ronix-II wakeboard
52. Ronix wakeboard bindings
53. Street fighter video arcade game
54. Marshall amp DSL40
55. Blink camera system
56. Mesa boogie half stack
57. Marshall full stack
58. Marshall half stack

1 59. Power amp
2 60. Guitar cabinet
3 61. Bass cabinet
4 62. Combo amp or bass head
5 63. Ampeg bass cabinet
6 64. a p.a. equalizer board

7 **INTERROGATORY NO. 17:**

8 If you contend that the items listed in Interrogatory No. 16 are not currently in your
9 possession, please state their current location.

10 **INTERROGATORY NO. 18:**

11 If you contend any of the items listed in Interrogatory No. 16 are not community property,
12 please explain your basis for such contention.

13 Dated this 10th day of May, 2019.

14 **HANRATTY LAW GROUP**

15 By: Carrie Primas
16 Carrie J. Primas, Esq.
17 Nevada Bar No. 12071
18 1815 Village Center Circle, Suite 140
19 Las Vegas, Nevada 89134
20 PH: (702) 821-1379
21 FAX: (702) 870-1846
22 EMAIL: attorneys@hanrattylawgroup.com
23 Attorney for Defendant, Amanda Reed
24
25
26
27
28

EXHIBIT “B”

EXHIBIT “B”

EXHIBIT “B”

1 REQT
HANRATTY LAW GROUP
2 Carrie J. Primas, Esq.
State Bar of Nevada No. 12071
3 1815 Village Center Circle, Suite 140
Las Vegas, Nevada 89134
4 PH: (702) 821-1379
5 FAX: (702) 870-1846
EMAIL: attorneys@hanrattylawgroup.com
6 Attorneys for Defendant, Amanda Reed

7
8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 DEVIN REED,) Case No: D-18-568055-D
11 Plaintiff,) Dept No: F
12 v.)
13 AMANDA REED,) DEFENDANT'S FIRST REQUEST FOR
14 Defendant.) PRODUCTION OF DOCUMENTS
PROPOUNDED ON PLAINTIFF

15 TO: Devin Reed, by and through his attorney of record, Louis C. Schneider, Esq.

16
17 Pursuant to Rule 33 of Nevada Rule of Civil Procedure, Defendant, Amanda Reed, by and
18 through her attorney of record, Carrie J. Primas, Esq., of Hanratty Law Group hereby requests
19 Plaintiff, Devin Reed, respond to Defendant's First Request for Production of Documents.
20 Pursuant to said rule, Plaintiff is required to respond to Defendant's First Request for Production
21 of Documents within thirty (30) days of service of the request.

22
23 DEFINITIONS AND INSTRUCTIONS

24 (a) You must serve a written response. Your response must state that production and
25 related activities will be permitted as requested or that the requested production is objected to, in
26 which event the reasons for your objection must be stated.

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1 (b) Documents produced for inspection must be produced as they are kept in the usual
2 course of business or be organized and labeled to correspond with the categories in this request

3 (c) The word "DOCUMENTS" includes, without limiting the generality of its meaning, all
4 originals or copies, where originals are unavailable, and no identical copies (whether different
5 from originals by reason of notation made on such copies or otherwise) of all written, recorded or
6 graphic matter, however produced or reproduced, whether or not now in existence, or
7 correspondence, telegrams, notes or sound recordings of any type of conversation, meeting or
8 conference, minutes of meetings, memoranda, interoffice communications, studies, analyses,
9 reports, summaries and results of investigations and tests, reviews, contracts, agreements,
10 working papers, tax returns, statistical records, ledgers, books of account, vouchers, bank checks,
11 bank statements, invoices, receipts, computer data, stenographers' notebooks, manuals, directives,
12 bulletins, desk calendars, appointment books, diaries, maps, charts, photographs, plats, drawings,
13 or other graphic representations, logs, investigators' reports or papers similar to any of the
14 foregoing, however denominated means writing, drawings, graphs, charts, photographs, audio
15 tapes, and other data compilations from which information can be obtained and translated into
16 reasonably usable form.
17

18
19 (d) The words "YOU" and "YOUR" means you, your representatives, agents, insurers,
20 attorneys, employees, directors, officers, subsidiaries, affiliates and all others over whom you
21 have control.

22 (e) The words "possession, custody, or control" mean all documents and things belonging
23 to you that are in you possession; all documents and things belonging to others which you have
24 custody; and all documents and things in the custody of others over which you have the right to
25 control.
26

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1 (f) If you at any time had possession or control of a document called for under this Request
2 and if such document has been lost, destroyed, purged, or is not presently in your possession or
3 control, you shall describe the document; the date of its loss; destruction, purge, or separation
4 from possession or control; and the circumstances surrounding its loss, destruction, purge, or
5 separation from possession or control.

6 (g) If any document requested is not within your personal custody or control, so state. If
7 the document is not in your personal control or custody, identify every person or entity you know
8 or believe has custody or control of such document.

10 (h) As used in this Request, the term "person" includes, without limiting the generality of
11 its meaning, every natural person, corporate entity, partnership, association, governmental body
12 or agency.

13 (i) As used in this Request, the terms "identification of a person or entity" includes stating
14 his, her or its full name; his or her most recent home address and telephone number; his, her or its
15 most recent known business address and telephone number; his or her present position; and his,
16 her or its prior connection or association with any party to this litigation.

18 (j) If you cannot produce any document requested, after exercising diligence to secure the
19 document or photograph, so state and answer to the extent possible, specifying your inability to
20 produce and stating whatever information or knowledge you have concerning the document or
21 photograph you are unable to produce.

22 (k) If you claim privilege as to any communication as to documents or photographs
23 requested, specify the privilege claimed, the communication and/or answer as to which that claim
24 is made, the parties to the communication, the topic discussed in the communication and the basis
25 for your claim.

26 \\\

1 (l) These Requests are continuing and require supplemental answers if you obtain further
2 information with respect to the same between the date your answers are served and the entry of
3 judgment.

4
5 REQUESTS

6 REQUEST NO. 1:

7 Please provide true and correct copies of your tax returns for the years 2010 through 2017,
8 including all W-2's, 1099's, and schedules filed therewith.

9 REQUEST NO. 2:

10 Please provide any and all documents evidencing all income received from May 20, 2017,
11 through the present, including pay stubs, bonus checks, and commissions checks.

12 REQUEST NO. 3:

13 For every account identified in Interrogatory No. 6, please provide statements from the
14 date of marriage to the date of production.

15 REQUEST NO. 4:

16 For every credit card, line of credit, and note identified in your answer to Interrogatory
17 No. 7, please provide all related documents, including statements and proof of payments, from the
18 date of marriage to the date of production.

19 REQUEST NO. 5:

20 For every financial obligation identified in your answer to Interrogatory No. 8, produce all
21 related documents, including contracts, statements, and proof of payment from the date of
22 marriage to the date of production.

23 REQUEST NO. 6:

24 Produce copies of all documents reflecting each pension plan, profit sharing plan, deferred
25 compensation plan, 401(k), IRA, or other retirement plan in which any rights or benefits
26
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1 whatsoever, vested or unvested or otherwise contingent, that are held or claimed by you or for
2 your benefit, including without limitation all documents reflecting contributions made by you or
3 for your benefit at any time from the date of your marriage to the present date, and all documents
4 reflecting your current interest therein, the value thereof, the monthly payments thereon, and the
5 amount and duration of continuing payments, including without limitation, pension and profit
6 sharing plans, including IRA accounts held by you or for your benefit, held alone, with Plaintiff,
7 or with any other person. This request includes, but is not limited to, a plan description and plan
8 summary of your pension plan, profit sharing plan or retirement plan.
9

10 **REQUEST NO. 7:**

11 Please provide a copy of the Kelly Blue Book from which you determined the values
12 listed in your answer to Interrogatory No. 13.

13 **REQUEST NO. 8:**

14 From the date of marriage to the date of your production, please provide all statements
15 and documents reflecting any and all security and investment accounts currently owned by you or
16 owned by you during that period or in which you claim to have an interest, or being held for your
17 benefit, including stocks, mutual funds, bonds, cash accounts, margin accounts, option accounts,
18 commodities and investments of every kind. Such documentation shall include, but not be limited
19 to, all statements sent to you from any brokerage firms over which you have power to buy or sell
20 or which are wholly or partially in your name or under the name of any other person or entity
21 which are being held for your benefit.
22

23 **REQUEST NO. 9:**

24 Please provide any and all documents related to any life insurance policies in your name.
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1 **REQUEST NO. 10:**

2 Please provide true and correct copies of any and all documents related to your current
3 employment, including, but not limited to, paycheck stubs, employment contracts, commission
4 agreements, bonus agreements, profit sharing, insurance benefits, and work schedule.

5 **REQUEST NO. 11:**

6 Please provide true and correct copies of your last ten (10) pay stubs for each and every
7 source of employment.
8

9 **REQUEST NO. 12:**

10 Please provide any and all documents related to any and all efforts you have made to
11 obtain employment since September 23, 2018.
12

13 **REQUEST NO. 13:**

14 Please provide any and all documents supporting your claim that you were terminated
15 from your prior job due to Amanda's actions.

16 **REQUEST NO. 14:**

17 Please provide any and all documents evidencing the purported values of the assets listed
18 on your Financial Disclosure Form.
19

20 **REQUEST NO. 15:**

21 Please provide any and all documents in support of your answer to Interrogatory No. 15.

22 **REQUEST NO. 16:**

23 Please provide any and all documents in support of your answer to Interrogatory No. 16.

24 **REQUEST NO. 17:**

25 Please provide any and all documents in support of your answer to Interrogatory No. 17.
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REQUEST NO. 18:

Please provide any and all documents in support of your answer to Interrogatory No. 18.

Dated this 17th day of May, 2019.

HANRATTY LAW GROUP

By: Carrie J. Primas
Carrie J. Primas, Esq.
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Las Vegas, Nevada 89134
Phone: (702) 821-1379
Fax: (702) 870-1846
Email: attorneys@hanrattylawgroup.com
Attorney for Defendant, Amanda Reed

EXHIBIT “C”

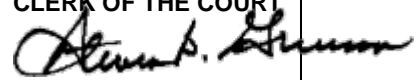
EXHIBIT “C”

EXHIBIT “C”

Defendant 0019
APPX0538

DISTRICT COURT
CLARK COUNTY, NEVADA

Electronically Filed
8/12/2019 3:16 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 to Compel Discovery Pursuant to NRCP 37 in the above-entitled matter is set for hearing as follows:

Date: September 27, 2019
Time: 1:00 PM
Location: Courtroom 15
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

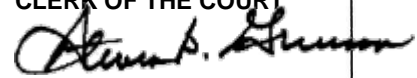
By: /s/ Cecilia Dixon
Deputy Clerk of the Court

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/ Cecilia Dixon
Deputy Clerk of the Court

APPX0539



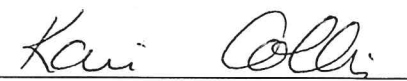
1 CSERV
2 HANRATTY LAW GROUP
3 Kari J. Hanratty, Esq.
4 State Bar of Nevada No. 7677
5 1815 Village Center Circle, Suite 140
6 Las Vegas, Nevada 89134
7 PH: (702) 821-1379
8 FAX: (702) 870-1846
9 EMAIL: attorneys@hanrattylawgroup.com
10 Attorneys for Defendant, Amanda Reed

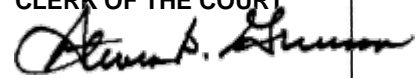
8 DISTRICT COURT
9 FAMILY DIVISION
10 CLARK COUNTY, NEVADA

11 DEVIN REED,)	Case No: D-18-568055-D
)	Dept No: F
12 Plaintiff,)	
)	
13 v.)	CERTIFICATE OF ELECTRONIC
)	SERVICE
14 AMANDA REED,)	
)	
15 Defendant.)	
)	

16
17 I hereby certify that I am an employee of Hanratty Law Group, and on the 12th day of
18 August, 2019, I served a true and correct copy of the *Notice of Motion and Motion to Compel*
19 *Discovery Pursuant to NRCP 37* by using the Wiz-Net E-Service addressed to the following
20 email registered on the E-Service List for this case as follows:

21 Louis C. Schneider, Esq.
22 lclawllc@gmail.com
23 Attorney for Plaintiff

24 By: 
25 Employee of Hanratty Law Group



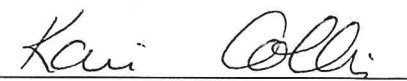
1 CSERV
2 HANRATTY LAW GROUP
3 Kari J. Hanratty, Esq.
4 State Bar of Nevada No. 7677
5 1815 Village Center Circle, Suite 140
6 Las Vegas, Nevada 89134
7 PH: (702) 821-1379
8 FAX: (702) 870-1846
9 EMAIL: attorneys@hanrattylawgroup.com
10 Attorneys for Defendant, Amanda Reed

8 DISTRICT COURT
9 FAMILY DIVISION
10 CLARK COUNTY, NEVADA

11 DEVIN REED,)	Case No: D-18-568055-D
)	Dept No: F
12 Plaintiff,)	
)	
13 v.)	CERTIFICATE OF ELECTRONIC
)	SERVICE
14 AMANDA REED,)	
)	
15 Defendant.)	
)	

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21 Louis C. Schneider, Esq.
22 lclawllc@gmail.com
23 Attorney for Plaintiff

24 By: 
25 Employee of Hanratty Law Group