

1 Devin has refused to provide any financial information, including the newest
2 appraisal. As the Court is aware, Devin quit or was fired from his job during
3 litigation. According to Devin, he is working; however, he has not provided any
4 information. As a matter of fact, Devin was not forthcoming with any of his discovery
5 responses and there is a Motion to Compel currently scheduled for August 28,
6 2019, at 1:30 p.m. How can Counsel properly argue support and arrears absent this
7 information and how can the Court properly make a determination? Both child
8 support and arrears are at issue for trial and Devin has not paid support since
9 separation. That being said, it would unduly prejudice Amanda if the Court
10 proceeds with trial absent the necessary information for the Court to make a
11 decision.
12

13
14
15 *Domestic Violence as it relates to Custody and Amending the Complaint.*
16

17 As stated above, *Castle vs. Simmons* trumps *McMonigle vs. McMonigle*, and
18 the intent of *Castle* is extremely clear.

19 The district court has an obligation to make a sound decision on the
20 paramount concern in custody cases—the child's best interests. Although the
21 res judicata doctrine, as articulated in *Murphy's* "changed circumstances"
22 requirement, serves an extremely important function in preventing
23 dissatisfied parties from filing repetitive, serial motions in an attempt to
24 manipulate the judicial system, res judicata principles should not prevent a
25 court from ensuring that the child's best interests are served. As our
26 Legislature has recognized, domestic violence poses a very real threat to a
27 child's safety and well-being. The court must hear *all* information regarding
28 domestic violence in order to determine the child's best interests. Domestic
violence, by its very nature, may be difficult to discover. Once it is
discovered, the court should not be precluded from considering it simply
because it was not previously raised. Consequently, evidence of domestic
violence that was not previously discovered, or the extent of which was

1 unknown, when the prior custody order was entered is properly considered
2 by the district court in determining custody, along with any post-order
3 domestic violence. Even previously litigated acts of domestic violence may
4 need to be reviewed if additional acts occur. As the North Dakota Supreme
Court has recognized, "The legislature intended that courts *presume* that *any*
domestic violence negatively impacts the best interests of the children."

5
6 Devin can argue that Amanda is being difficult, delaying and trying to get a
7 second bite at the apple, but there are extreme concerns regarding Devin and his
8 behavior. Just since the last hearing, Devin went into a fit of rage and punched
9 holes in the walls of his house while threatening and screaming at the children
10 (reported by the children), he failed to protect the children from his son Jacob who
11 maintains significant issues and Devin simply makes excuses for each of his
12 behaviors.
13

14
15 Furthermore, Amanda will be able to establish that Devin has committed
16 extreme acts of domestic violence in front of the children. It should be noted that
17 neither Attorney Primas nor Attorney Hanratty was aware of the extent of the
18 violence until recently as Amanda was previously advised that the extent of the
19 violence was irrelevant as it related to custody and was never provided the
20 opportunity to file a tort claim.
21

22
23 Given the current appeal, the request to modify custody, the current
24 contempt, the Motion to Compel, and Devin's failure to provide the necessary
25 information related to finances, trial must be continued. Given the necessity to
26 continue trial, the amendment to the Complaint will not cause undue delay.
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II.

Conclusion

Therefore, based upon the foregoing, Amanda requests the Court to enter an Order:

1. Issuing an Order to Show Cause why Plaintiff should not be held in contempt for Court for violation of Order filed September 19, 2018;
2. For leave to amend Defendant's Counterclaim for Divorce;
3. Modifying Custody so as to award Defendant with primary physical custody;
4. Continuing trial currently set for September 12, 2019; and
5. Awarding Defendant attorney fees and costs.
6. For such other and further relief as the Court deems just and proper.

Dated this 21st day of August, 2019.

HANRATTY LAW GROUP

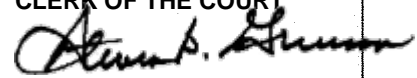
By: 

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

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Louis C. Schneider, Esq.
lcslawllc@gmail.com
Attorney for Plaintiff

By: Kaw Collins
Employee of Hanratty Law Group



ACSR
HANRATTY LAW GROUP
Kari J. Hanratty, Esq.
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EMAIL: attorneys@hanrattylawgroup.com
Attorneys for Defendant, Amanda Reed

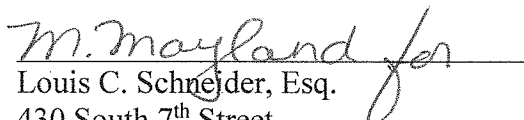
DISTRICT COURT
CLARK COUNTY, NEVADA

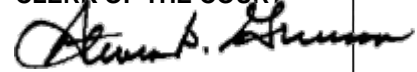
DEVIN REED,)	Case No: D-18-568055-D
)	Dept No: F
Plaintiff,)	
)	
v.)	RECEIPT OF COPY
)	
AMANDA REED,)	
)	
Defendant.)	

Louis C. Schneider, Esq., attorney of record for Plaintiff herein, hereby accepts service of the following in the above entitled matter:

1. Defendant's Notice of Motion and Motion to Compel Discovery Pursuant to NRCP 37;
2. Exhibits in Support of Motion to Compel Discovery Pursuant to NRCP 37;
3. Ex Parte Application for Order Shortening Time Defendant's Motion to Compel Discovery; and
4. Order Shortening Time.

Dated this 21st day of August, 2019.


Louis C. Schneider, Esq.
430 South 7th Street
Las Vegas, Nevada 89101
Phone: (702) 435-2121
Fax: (702) 431-3807
Email: lcsllawllc@yahoo.com
Attorney for Plaintiff



SUPP
HANRATTY LAW GROUP
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Email: attorneys@hanrattylawgroup.com
Attorneys for Defendant, Amanda Reed

DISTRICT COURT
CLARK COUNTY, NEVADA

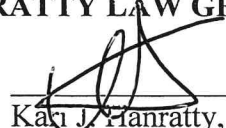
DEVIN REED,) Case No: D-18-568055-D
) Dept No: F
Plaintiff,)
v.) SUPPLEMENT TO DEFENDANT'S
) MOTION FOR AN ORDER TO SHOW
AMANDA REED,) CAUSE WHY PLAINTIFF SHOULD NOT
) BE HELD IN CONTEMPT OF COURT;
Defendant.) FOR LEAVE TO AMEND
) COUNTERCLAIM; FOR A
) MODIFICATION OF CUSTODY; TO
) CONTINUE TRIAL; AND FOR
) ATTORNEY FEES AND COSTS

COMES NOW Defendant, Amanda Reed, by and through her attorney, Kari J. Hanratty, Esq., of Hanratty Law Group and as a supplement to Defendant's *Motion for an Order to Show Cause Why Plaintiff Should Not be Held in Contempt of Court; for Leave to Amend Counterclaim; for a Modification of Custody; to Continue Trial; and for Attorney Fees and Costs*, filed on July 25, 2019, Defendant hereby submits as follows:

Affidavit of Amanda Reed.

DATED this 21st of August, 2019.

HANRATTY LAW GROUP


Kari J. Hanratty, Esq.
Nevada Bar Number: 7677
1815 Village Center Circle, Suite 140
Las Vegas, Nevada 89134
Attorneys for Defendant, Amanda Reed

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Bruce Shapiro, Esq.
Joseph W. Riccio, Esq.
email@pecoslawgroup.com
Attorneys for Plaintiff

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AFFIDAVIT OF AMANDA REED

STATE OF NEVADA)
 ss
County of Clark)

1. I, Amanda Reed, am the Defendant in the above referenced matter and have read the foregoing Motion for Order to Show Cause Why Plaintiff Should Not be Held in Contempt of Court, and the factual averments it contains are true and correct to the best of my knowledge, except as to those matters based on information and belief, and as to those matters, I believe them to be true. Those factual averments contained in the referenced filing are incorporated herein as if set forth in full.
2. Pursuant to the Order from the August 14, 2018 hearing, filed on September 19, 2018, Devin and I share joint legal and joint physical custody of the minor children. Also pursuant to that order, there shall be no overnights for [Devin's] minor child (Jacob) during his parental timeshare with the minor children, Abby and Shawn (page 5, lines 1-3). A Mutual Behavior Order was also filed on August 14, 2018.
3. At the hearing on October 16, 2018, the custodial orders from the August 14, 2018, including the provision regarding Jacob, were converted to permanent orders. The Order from the October 16, 2018, hearing, also provides that Devin and I shall abide by the Mutual Behavior Order and that the same shall extend to any third-party family members (see page 2, lines 14-17), and that we shall be responsible for transporting the minor children to all extracurricular activities during our parental timeshare (see page 2, lines 17-18). The provisions regarding extracurricular activities does not require that the activities be previously agreed

1 upon between Devin and I.

2 4. During our marriage, Jacob exhibited concerning behavior that caused Devin and I
3 to agree that he would not spend the night at ^{our} ~~their~~ house, be unattended with the
4 minor children, or ever be in a room with a closed door. That behavior included
5 harming and killing animals, writing about raping women, and writing about
6 killing Devin and I. This behavior, as well as our agreements regarding Jacob
7 during our marriage, are what led to the provision regarding Jacob as noted above.
8

9 5. Despite this provision, Jacob is now living with Devin. The children have told me
10 about numerous overnights with Jacob, then on June 17, 2019, both children
11 informed me that Jacob and Devin's son, Thomas, moved in with them. The
12 children have also indicated that Devin has Jacob babysit Shawn when he takes
13 Abby to cheerleading. On or about July 4, 2019, when I picked up the minor
14 children after Devin's custodial time, Abby told me that Jacob lives with Devin.
15 The minor children have also indicated that they no longer have a bedroom at
16 Devin's home, because Jacob lives there and sleeps in their room, so they share a
17 bed with Devin. The children have also indicated that if they kick their dad while
18 they are sleeping, he screams at them and tells them that if they don't stay still, he
19 is going to make them sleep with Jacob. Further, Abby has indicated that Shawn
20 sucks on and licks Jacob's arm and neither Devin nor Jacob discourage this
21 behavior.
22

23 6. Devin has also violated the Mutual Behavior Order as well as the order regarding
24 transporting the minor children to extra-curricular activities. Regarding the Mutual
25 Behavior Order, Devin has violated the following provisions:
26

27 a. You shall avoid unnecessary contact with the other party's family, friends,
28

1 associates, neighbors, co-workers, "significant other," etc., and you shall not
2 initiate conflicts with them.

3 b. You shall not contact any person associated with the other party...for purposes
4 of discussing court proceedings or making negative/disparaging allegations
5 about the other party.


6 c. You shall not provide, either directly or through third parties, copies of any
7 unsolicited documents (personal letters, court pleadings, etc.) to anyone
8 associated with a party (family members, neighbors, employers, etc.) for the
9 intended purpose of casting the other party in a negative light.
10

11 7. On or about March 9, 2019, I learned that my cousin, Laurlyn, who has been the
12 babysitter for the minor children, had recently separated from her husband due to
13 an act of domestic violence perpetrated by her husband. I also learned that her
14 cousin's immediate family believes that she has a drug addiction. As a result, I
15 sent a message to Devin on Our Family Wizard stating that I do not want Laurlyn
16 to babysit the children anymore as I am concerned for their safety due to these
17 recent events. Devin then forwarded my Our Family Wizard to Laurlyn, in direct
18 violation of the provisions noted above.
19


20 8. Devin also refuses to take Abby to her extracurricular activities any time he is
21 unhappy with me. On April 29, 2019, I sent Devin a message on Our Family
22 Wizard asking if he is willing to take Abby to Girl Scouts on May 7 and May 21,
23 which were his custodial days and days on which Abby had Girl Scout meetings.
24 Devin stated that he would take her. I told Devin that the meeting was from 6:30
25 to 7:30, to which Devin responded that he had a class that day until 7:30, but
26 offered to allow me to keep Abby with me after school on those days if I wanted
27
28

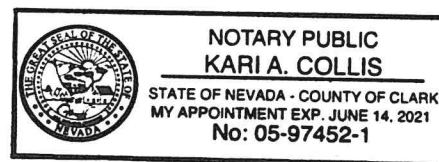
1 to take her to the meetings.

2 9. On May 7, 2019, I did keep Abby after school and take her to Girl Scouts. Then
3 on May 11, 2019, Devin booked a trip to South Carolina, to return to Las Vegas
4 on May 18, 2019. Devin subsequently realized that he would be gone for Abby's
5 Kindergarten graduation on May 15, 2019, and had to cancel his trip. He blamed
6 me for him missing his trip, and subsequently refused to allow Abby to attend her
7 activities. On May 18, 2019, I sent Devin a message on Our Family Wizard
8 informing him of a mandatory meeting for Abby's cheerleading at the same time
9 as Abby's therapy appointment, and stating that I would be able to change the
10 therapy appointment to May 21, 2019, the same day as Abby's Girl Scout
11 meeting, if Devin would still agree to me keeping Abby after school that day to
12 take her to therapy and then Girl Scouts. Devin, still angry that he would be
13 missing his trip due to his own actions, indicated that he was not in agreement
14 with anything in my message. On May 21, 2019, I sent another Our Family
15 Wizard message asking whether Devin would be taking Abby to Girl Scouts, to
16 which he responded, "please do not schedule events on my time." He did not take
17 Abby to Girl Scouts that day.

18
19
20 
21 Amanda Reed

22
23 Subscribed and Sworn to before me this
24 21st day of August, 2019.

25 
26 Notary Public in and for said County
27 And State
28



DISTRICT COURT
CLARK COUNTY, NEVADA

Divorce - Complaint

COURT MINUTES

August 27, 2019

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

August 27, 2019 02:30 PM 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, Not Present

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

Shawn Reed, Subject Minor, Not Present

JOURNAL ENTRIES

DEFENDANT'S MOTION FOR AN ORDER TO SHOW CAUSE WHY PLAINTIFF SHOULD NOT BE HELD IN CONTEMPT; FOR LEAVE TO AMEND COUNTERCLAIM; FOR A MODIFICATION OF CUSTODY; TO CONTINUE TRIAL AND FOR ATTORNEY'S FEES AND COSTS... OPPOSITION TO MOTION FOR AN ORDER TO SHOW CAUSE WHY PLAINTIFF SHOULD NOT BE HELD IN CONTEMPT; FOR LEAVE TO AMEND COUNTERCLAIM; FOR A MODIFICATION OF CUSTODY; TO CONTINUE TRIAL AND FOR ATTORNEY'S FEES AND COSTS AND COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS... REPLY TO PLAINTIFF'S OPPOSITION TO MOTION FOR AN ORDER TO SHOW CAUSE WHY PLAINTIFF SHOULD NOT BE HELD IN CONTEMPT; FOR LEAVE TO AMEND COUNTERCLAIM; FOR A MODIFICATION OF CUSTODY; TO CONTINUE TRIAL AND FOR ATTORNEY'S FEES AND COSTS AND OPPOSITION TO COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS

Attorney Kari Hanratty, Bar No. 7677, present on behalf of Defendant.

Counsel represented they have reached an agreement and placed the terms on the record.

Parties STIPULATE as follows

1. Defendant will DISMISS the pending APPEAL and withdraw the Motion to Compel Discovery Pursuant to NRCP 37. The hearing set on 8/28/19 at 1:30 p.m. before the Discovery Commissioner will be VACATED.

2. Plaintiff's answers to discovery will be provided within thirty (30) days.

3. It is agreed that Scott Dugan will do a JOINT APPRAISAL and the parties stipulate this will be the list price for the home. At that point, parties will have sixty (60) days to negotiate a final resolution on the residence or the residence will be sold. If Defendant elects not to proceed with a buyout prior to the sixty (60) days, she is to provide the names of three realtors for selection by Plaintiff. Once a realtor is selected, the home is to be listed within ten (10) days. It is agreed that whomever is in the home at the time of sale is to cooperate with the realtor and maintain the home in selling condition. Any disputed equity amounts received from the sale of the home are to be placed in the attorney's

Printed Date: 9/5/2019

Page 1 of 2

Minutes Date:

August 27, 2019

Notice: Journal Entries are prepared by the courtroom clerk and are not the official record of the court.

APPX0588

trust account.

4. Any CHILD SUPPORT ARREARS determined to be owed by Plaintiff, will be paid to Defendant from Plaintiff's funds received from the sell of the residence.

5. Parties agree that Dr. Paglini will perform a CHILD CUSTODY EVALUATION. Defendant will pay for the cost of the evaluation. If there are no issues found, it is agreed that the parties will continue to follow the current custodial arrangement. RETURN HEARING set for 12/3/19 at 11:00 a.m. for determination if there is enough to proceed on a custody modification.

6. Plaintiff's request for attorney fees is RESERVED.

7. It is agreed that Counsel will work diligently to attempt to negotiate the remaining financial issues and will submit a Decree of Divorce upon resolution of same.

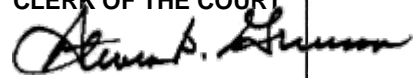
COURT SO ORDERED.

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

INTERIM CONDITIONS:

FUTURE HEARINGS:

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



1 **SAO**
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 Phone: (702) 821-1379
8 Fax: (702) 870-1846
9 Email: attorneys@hanrattylawgroup.com
10 Attorneys for Defendant, Amanda Reed

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

15 DEVIN REED,

16 Plaintiff,

17 v.

18 AMANDA REED,

19 Defendant.

) Case No: D-18-568055-D

) Dept No: F

) **STIPULATION AND ORDER FOR**
) **CUSTODY EVALUATION**

20 COMES NOW the Plaintiff, Devin Reed, by and through his attorney, Louis C. Schneider,
21 Esq., of the Law Offices of Louis C. Schneider, LLC, and Defendant, Amanda Reed, by and
22 through his attorneys, Kari J. Hanratty, Esq., of Hanratty Law Group and hereby stipulate and
23 agree as follows:

24 IT IS HEREBY STIPULATED AND AGREED AND THEREFORE ORDERED that Dr.
25 Paglini shall conduct a child custody evaluation with psychological testing.

26 IT IS FURTHER STIPULATED AND AGREED AND THEREFORE ORDERED that
27 Dr. Paglini shall be designated as joint expert witness in this matter.

28 IT IS FURTHER STIPULATED AND AGREED AND THEREFORE ORDERED that
Defendant will be solely responsible for the cost of the custody evaluation.

\\

\\

\\

1 IT IS FURTHER STIPULATED AND AGREED AND THEREFORE ORDERED that as
2 a return hearing is schedule for December 3, 2019, at 11:00 a.m., Dr. Paglini shall provide the
3 Court with his report on or before November 27, 2019.

4 IT IS SO ORDERED this 16th day of Sept, 2019.

5
6 
7 District Court Judge (CH)


DENISE L. GENTILE


8 Dated this 4th day of September, 2019.

Dated this ____ day of August, 2019.

10 HANRATTY LAW GROUP

LAW OFFICE OF LOUIS C.
SCHNEIDER, LLC

11
12 By: 
13 Kari J. Hanratty, Esq.
14 Nevada Bar No. 7677
15 1815 Village Center Circle, Suite 140
16 Las Vegas, Nevada 89134
17 Phone: (702) 821-1379
18 Fax: (702) 870-1846
19 Email: attorneys@hanrattylawgroup.com
20 Attorney for Defendant, Amanda Reed

21 By: 
22 Louis C. Schneider, Esq.
23 Nevada Bar No. 9683
24 430 South 7th Street
25 Las Vegas, Nevada 89101
26 Phone: (702) 435-2121
27 Fax: (702) 431-3807
28 Email: lcsllawllc@yahoo.com
Attorney for Plaintiff, Devin Reed

Case Number: D-18-568055-D

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Louis C. Schneider, Esq.
lcsllawllc@gmail.com
Attorney for Plaintiff

2

APPX0594

1 IT IS FURTHER STIPULATED AND AGREED AND THEREFORE ORDERED that as
2 a return hearing is schedule for December 3, 2019, at 11:00 a.m., Dr. Paglini shall provide the
3 Court with his report on or before November 27, 2019.

4 IT IS SO ORDERED this 16th day of Sept, 2019.

5
6 
7 District Court Judge (CB)


8 DENISE L. GENTILE

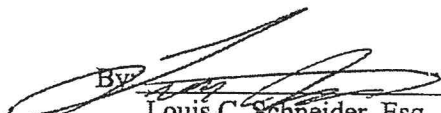
9 Dated this 4th day of September, 2019.

Dated this _____ day of August, 2019.

10 HANRATTY LAW GROUP

LAW OFFICE OF LOUIS C.
SCHNEIDER, LLC

11
12 By: 
13 Kari J. Hanratty, Esq.
14 Nevada Bar No. 7677
15 1815 Village Center Circle, Suite 140
16 Las Vegas, Nevada 89134
17 Phone: (702) 821-1379
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20 Attorney for Defendant, Amanda Reed

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28 Email: lcslawllc@yahoo.com
Attorney for Plaintiff, Devin Reed

DISTRICT COURT
CLARK COUNTY, NEVADA

Divorce - Complaint

COURT MINUTES

December 03, 2019

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

December 03, 2019 11:00 AM Return Hearing

HEARD BY: Gentile, Denise L **COURTROOM:** Courtroom 03

COURT CLERK: McCulloch, Melissa

PARTIES PRESENT:

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

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

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

Shawn Reed, Subject Minor, Not Present

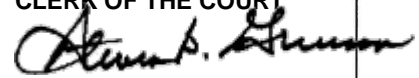
JOURNAL ENTRIES

RETURN HEARING: CHILD CUSTODY EVALUATION

Prior to the time set for hearing Court was informed that a Stipulation and Order to continue the hearing was received; therefore, COURT ORDERED matter OFF CALENDAR.

INTERIM CONDITIONS:

FUTURE HEARINGS:



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

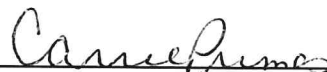
DISTRICT COURT
CLARK COUNTY, NEVADA

DEVIN REED,)	Case No: D-18-568055-D
)	Dept No: F
Plaintiff,)	
)	
v.)	NOTICE OF ENTRY OF ORDER
)	
AMANDA REED,)	
)	
Defendant.)	

Please take notice that a *Stipulation and Order to Continue Hearing* was duly entered in the above referenced case on the 10th day of December, 2019, a copy of which is attached hereto and by reference fully incorporated herein.

Dated this 10th day of December, 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

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CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that I am an employee of Hanratty Law Group, and on the 10th day of December, 2019, I served a true and correct copy of the *Notice of Entry of Order* (with Order attached hereto) by using the Wiz-Net E-Service addressed to the following email registered on the E-Service List for this case as follows:

Louis C. Schneider, Esq.
lcslawllc@gmail.com
Attorney for Plaintiff

By: Kari Collins
Employee of Hanratty Law Group

Steven D. Grierson

1 **SAO**
2 **HANRATTY LAW GROUP**
3 Carrie J. Primas, Esq.
4 State Bar of Nevada No. 12071
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6 Las Vegas, Nevada 89134
7 Phone: (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 Plaintiff,

16 v.

17 AMANDA REED,

18 Defendant.

) Case No: D-18-568055-D

) Dept No: F

) **STIPULATION AND ORDER TO**
) **CONTINUE HEARING**

19 COMES NOW the Plaintiff, Devin Reed, by and through his attorney, Louis C. Schneider,
20 Esq., of the Law Offices of Louis C. Schneider, LLC, and Defendant, Amanda Reed, by and
21 through her attorneys, Carrie J. Primas, Esq., of Hanratty Law Group and hereby stipulate and
22 agree as follows:

23 IT IS HEREBY STIPULATED AND AGREED AND THEREFORE ORDERED that
24 pursuant to the letter from Dr. Paglini to the Court dated November 7, 2019, Dr. Paglini shall be
25 provided with a six (6) week extension to provide his report to the Court, thereby making the due
26 date on or before January 8, 2020.

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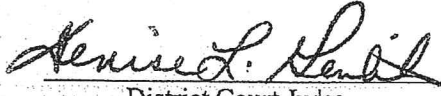
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IT IS FURTHER STIPULATED AND AGREED AND THEREFORE ORDERED that the return hearing scheduled for December 3, 2019, shall be continued to the next available date after January 8, 2020 and shall be heard on the 29th day of January, 2020, at 10:30 a.m./p.m.

IT IS SO ORDERED this 5th day of December, 2019.


District Court Judge *bm*
DENISE L. GENTILE

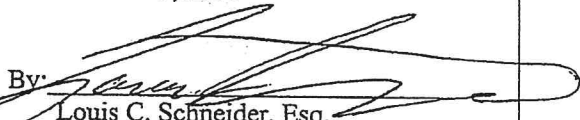
Dated this 22nd day of November, 2019.

Dated this ____ day of November, 2019.

HANRATTY LAW GROUP

LAW OFFICE OF LOUIS C.
SCHNEIDER, LLC

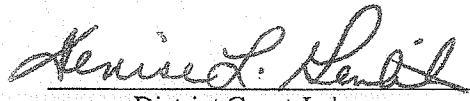
By: Carrie Primas
Carrie J. Primas, Esq.
Nevada Bar No. 12071
1815 Village Center Circle, Suite 140
Las Vegas, Nevada 89134
Phone: (702) 821-1379
Fax: (702) 870-1846
Email: attorneys@hanrattylawgroup.com
Attorney for Defendant, Amanda Reed

By: 
Louis C. Schneider, Esq.
Nevada Bar No. 9683
430 South 7th Street
Las Vegas, Nevada 89101
Phone: (702) 435-2121
Fax: (702) 431-3807
Email: lcsllawllc@yahoo.com
Attorney for Plaintiff, Devin Reed

Case Number: D-18-568055-D

1 IT IS FURTHER STIPULATED AND AGREED AND THEREFORE ORDERED that
2 the return hearing scheduled for December 3, 2019, shall be continued to the next available date
3 after January 8, 2020 and shall be heard on the 29th day of January, 2020, at 10:30
4 a.m./p.m.

5 IT IS SO ORDERED this 5th day of December, 2019.


6
7 
8 District Court Judge *bm*
9 DENISE L. GENTILE

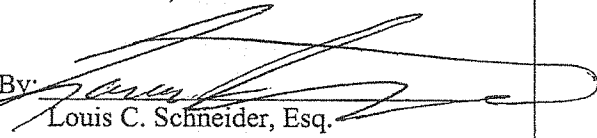
10 Dated this 22nd day of November, 2019.

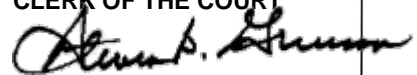
Dated this _____ day of November, 2019.

11 HANRATTY LAW GROUP

12 LAW OFFICE OF LOUIS C.
13 SCHNEIDER, LLC

14 By: 
15 Carrie J. Primas, Esq.
16 Nevada Bar No. 12071
17 1815 Village Center Circle, Suite 140
18 Las Vegas, Nevada 89134
19 Phone: (702) 821-1379
20 Fax: (702) 870-1846
21 Email: attorneys@hanrattylawgroup.com
22 Attorney for Defendant, Amanda Reed

23 By: 
24 Louis C. Schneider, Esq.
25 Nevada Bar No. 9683
26 430 South 7th Street
27 Las Vegas, Nevada 89101
28 Phone: (702) 435-2121
Fax: (702) 431-3807
Email: lcsllawllc@yahoo.com
Attorney for Plaintiff, Devin Reed



NOA
Jason Naimi, Esq.
Nevada Bar No. 9441
Robert Cerceo, Esq.
Nevada Bar No. 5247
Francesca Resch, Esq.
Nevada Bar No. 13011
efile@naimicerceo.com
NAIMI & CERCEO
10000 W. Charleston Blvd., Suite 110
Las Vegas, Nevada 89135
Telephone: (702) 745-6000
Facsimile: (702) 463-0905
Co-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 APPEARANCE OF CO-COUNSEL

TO: ALL PARTIES INTERESTED HEREIN:

Undersigned co-counsel, Jason Naimi, Esq. of Naimi & Cerceo, hereby appear on behalf of the Defendant, AMANDA REED, in the above-captioned matter. Please include the following on all certificates of service.

NAIMI CERCEO
10000 W. Charleston Blvd., Suite 110
Las Vegas, Nevada 89135
Telephone: (702) 745-6000
Email: efile@naimicerceo.com
Co-Counsel for Defendant

DATED this 7th day of January 2021.

NAIMI & CERCEO



JASON NAIMI, ESQ.
Nevada Bar No. 9441

Co-Counsel for Defendant

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of NAIMI & CERCEO, and that on the 7th day of January 2021, I caused the documents entitled *Notice of Appearance of Co-Counsel* to be served as follows:

☒ pursuant to EDCR 8.05(a), EDCR 8.05 (f), NRCP 5(b)(2)(D) and Administrative Order 14-2 captioned "in the Administrative Matter of Mandatory Electronic Service in Eighth Judicial District Court," by mandatory electronic service through the Eighth Judicial District Court' electronic filing system; and/or

☐ pursuant to EDCR 8.05(a) and NRCP 5(b)(2)(D), because the individual listed is not registered with the Court's **mandatory** e-service system, via electronic mail or facsimile; and/or

☐ by placing same to be depositing for mailing in the United States Mail, in a sealed envelope upon which first class mail postage was prepaid in Las Vegas, Nevada; and/or

To the individual(s) listed below at the address, email address and/ facsimile number indicated below.

Michancy Cramer michancy@glawvegas.com

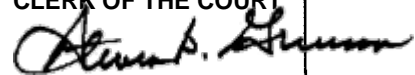
Alex Ghibaudo alex@glawvegas.com

KC Collis kcollis@hanrattylawgroup.com

Main HLG attorneys@hanrattylawgroup.com

Carrie Primas cprimas@hanrattylawgroup.com

/s/Stephanie Lazo
An employee of Naimi & Cerceo



1 **SAO**
2 **HANRATTY LAW GROUP**
3 Carrie J. Primas, Esq.
4 State Bar of Nevada No. 12071
5 1815 Village Center Circle, Suite 140
6 Las Vegas, Nevada 89134
7 Phone: (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

15 DEVIN REED,

16 Plaintiff,

17 v.

18 AMANDA REED,

19 Defendant.

) Case No: D-18-568055-D

) Dept No: F

) **STIPULATION AND ORDER FOR**
) **RELEASE OF CPS RECORDS**
)
)
)
)

20 COMES NOW Plaintiff, Devin Reed, by and through his attorney, Louis C. Schneider,
21 Esq., of the Law Offices of Louis C. Schneider, LLC, and Defendant, Amanda Reed, by and
22 through her attorney, Carrie J. Primas, Esq., of Hanratty Law Group, and hereby stipulate and
23 agree as follows:
24

25 IT IS HEREBY STIPULATED AND AGREED that, given the parties' stipulation for Dr.
26 John Paglini to perform a child custody evaluation with psychological testing, Dr. Paglini should
27 be provided with any and all information he feels is necessary and appropriate to complete such
28 evaluation;

IT IS FURTHER STIPULATED AND AGREED that it is necessary and appropriate to
release the CPS records involving the minor children at issue to Dr. John Paglini based on Dr.
Paglini's request for the same to allow him prepare the most comprehensive child custody

1 evaluation possible;

2 IT IS FURTHER STIPULATED AND AGREED that the CPS records involving the
3 minor children at issue shall be released to Dr. John Paglini for his review during the child
4 custody evaluation.

5 Dated this 21st day of January, 2020.

Dated this 21 day of January, 2020.

6 **HANRATTY LAW GROUP**

7 **LAW OFFICE OF LOUIS C.
8 SCHNEIDER, LLC**

9 By: Carrie J. Primas
10 Carrie J. Primas, Esq.
11 Nevada Bar No. 12071
12 1815 Village Center Circle, Suite 140
13 Las Vegas, Nevada 89134
14 Phone: (702) 821-1379
15 Fax: (702) 870-1846
16 Email: attorneys@hanrattylawgroup.com
17 Attorney for Defendant, Amanda Reed

By: Louis C. Schneider
Louis C. Schneider, Esq.
Nevada Bar No. 9683
430 South 7th Street
Las Vegas, Nevada 89101
Phone: (702) 435-2121
Fax: (702) 431-3807
Email: lcsllawllc@yahoo.com
Attorney for Plaintiff, Devin Reed

18 Court finds that the release of said
19 CPS records to Dr. Paglini is warranted
20 to assist the Court in resolving a substantive
21 issue in the above-referenced case, as he is
22 performing a custody evaluation in which
23 the information in the CPS records may be
24 pertinent for the investigation and final recommendation
25 to the Court. This finding is made as
26 required by NRS 432B.290(3).

27 Court orders that Dr. Paglini shall maintain
28 said records in his confidential file and shall
not release to the parties, or any other individual.

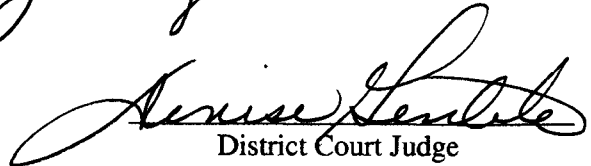
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ORDER

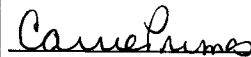
IT IS HEREBY ORDERED that the CPS records involving the minor child at issue shall be released to Dr. John Paglini. *(According to the terms set forth above)*

IT IS SO ORDERED on this 23rd day of January, 2020.


District Court Judge

DENISE L. GENTILE

Respectfully submitted this
21st day of January, 2020.


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

Divorce - Complaint

COURT MINUTES

January 29, 2020

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

January 29, 2020 10:30 AM Return Hearing

HEARD BY: Gentile, Denise L COURTROOM: Courtroom 03

COURT CLERK: McCulloch, Melissa

PARTIES PRESENT:

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

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

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

Shawn Reed, Subject Minor, Not Present

JOURNAL ENTRIES

RETURN HEARING: CHILD CUSTODY EVALUATION

Court NOTES, matter was taken OFF CALENDAR. Court spoke with Counsel off the record regarding status and the Court's intent to set the matter in the future for a one (1) hour session to discuss further proceedings.

Pursuant to STIPULATION, COURT ORDERED: SENIOR JUDGE SETTLEMENT CONFERENCE set on 2/11/20 at 1:30 p.m. Each Party shall submit a brief for the Senior Judge at least seventy-two (72) hours prior to the settlement conference, as well as file/serve an updated Financial Disclosure Form (FDF), if necessary, with courtesy copies delivered to the department drop box. Order referring to Senior Judge Settlement Program provided to Counsel and FILED.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Feb 11, 2020 1:30PM Settlement Conference
Courtroom 03 Gentile, Denise L

1 ORD

FILED IN OPEN COURT
January 29, 2020


CLERK OF THE COURT

2
3
4 EIGHTH JUDICIAL DISTRICT COURT,
FAMILY DIVISION
5 CLARK COUNTY, NEVADA

6 Devin Bryson Reed, Plaintiff

Case No.: D-18-568055-D

7 vs.

Department F

8 Amanda Raelene Reed, Defendant.
9

10
11 **ORDER REFERRING TO SENIOR JUDGE SETTLEMENT**
12 **PROGRAM**

13 WHEREAS Rule 5.524 of the Rules of Practice for the Eighth Judicial
14 District Court authorizes the Court to order the parties to participate in a
15 Settlement Conference.
16

17 WHEREAS the Court finds that this case is appropriate for referral to the
18 Senior Judge Settlement Program for a three hour setting;
19

20 WHEREAS there is limited time available to mediate this case, it is
21 necessary that the Senior Judge be provided a Settlement Brief at least 7 days
22 prior to the Settlement Conference.
23

24 NOW THEREFORE, IT IS HEREBY ORDERED that the parties and
25 their attorneys (if retained) shall appear on the Third Floor of the Family Court
26
27

1 Building, 601 N Pecos, Las Vegas, NV on the 11th day of February, 2020 at
2 1:30 p.m..

3 IT IS FURTHER ORDERED that any party or retained attorney that fails
4 to attend or arrives unreasonably late to the Settlement Conference may be
5 sanctioned by the Settlement Judge. The sanction may include, but is not
6 limited to, payment of the opposing party's costs and attorney fees related to the
7 Settlement Conference.
8
9

10 IT IS FURTHER ORDERED that a completed Confidential Settlement
11 Brief shall be provided to the assigned Judicial Department no later than 7 days
12 prior to the Settlement Conference. The Settlement Brief shall be in the
13 standardized format provided by the Family Law Self-Help Center, an example
14 of which is attached to this Order. The Settlement Brief shall not be filed, and
15 shall be no more than 10 pages in length.
16
17

18 IT IS FURTHER ORDERED that any party or retained attorney that fails
19 to submit a complete Settlement Brief may be sanctioned by the Settlement
20 Judge. The sanction may include, but is not limited to, payment of the opposing
21 party's costs and attorney fees related to the Settlement Conference.
22

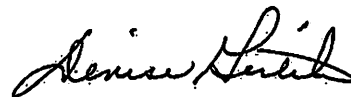
23 IT IS FURTHER ORDERED that any party or retained attorney that has
24 not filed a Financial Disclosure Form, or whose Financial Disclosure Form is no
25 longer accurate, shall file and serve a complete Financial Disclosure Form at
26 least 7 days prior to the Settlement Conference.
27

1 IT IS FURTHER ORDERED that, if the division of assets (real property,
2 vehicles, businesses, pensions, etc.) and/or debts has not been completely
3 resolved, each party shall bring documents (comparable values, blue book
4 values, appraisals, statements, etc.) demonstrating the value of each contested
5 asset and debt to the Settlement Conference.
6

7 IT IS FURTHER ORDERED that each party and attorney shall be
8 prepared for the Settlement Conference and participate in good faith.
9

10 IT IS FURTHER ORDERED that any violation of any part of this Order
11 shall be subject to NRS 22.101(3) and punishable by contempt.
12

13 IT IS SO ORDERED this 29th day of January, 2020
14

15 

16 _____
17 DENISE L. GENTILE
18 DISTRICT COURT JUDGE
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