

Electronically Filed
Jan 10 2022 11:04 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

EXHIBIT “R”

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+1 (702) 890-1190 >

You never left the school i
have her she will see yoh
Monday

That shit was super weird

Stop driving by in the white
jeep



Are you at scool

Today 7:34 PM

Well i will never let them call
you to make them feel better
ever again

Thanks for the police card
saying all is good kids will see
you Monday

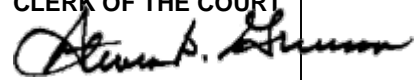


iMessage



**DISTRICT COURT
CLARK COUNTY, NEVADA**

Electronically Filed
4/8/2020 2:19 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 to Adopt Dr. Paglini's Recommendation; for an Order to Show Cause why Plaintiff Should not be Held In contempt of Court Modify Custody; and for Attorney Fees and Costs in the above-entitled matter is set for hearing as follows:

Date: May 13, 2020
Time: 9:30 AM
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

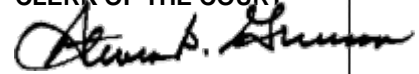
By: /s/ Rochelle Braswell
Deputy Clerk of the Court

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/ Rochelle Braswell
Deputy Clerk of the Court

APPX0704



1 **MOT**

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 PH: (702) 821-1379

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9 EMAIL: attorneys@hanrattylawgroup.com

10 Attorneys for Defendant, Amanda Reed

11 **DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 DEVIN REED,

14 Plaintiff,

15 v.

16 AMANDA REED,

17 Defendant.

Case No: D-18-568055-D

Dept No: F

**NOTICE OF MOTION AND
MOTION TO ADOPT DR.
PAGLINI'S RECOMMENDATION;
FOR AN ORDER TO SHOW
CAUSE WHY PLAINTIFF
SHOULD NOT BE HELD IN
CONTEMPT OF COURT; TO
MODIFY CUSTODY; AND FOR
ATTORNEY FEES AND COSTS**

Date of Hearing:

Time of Hearing:

Oral Argument Requested: YES

18
19
20
21 TO: Plaintiff, Devin Reed.

22
23 YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS
24 MOTION WITH THE CLERK OF THE COURT AND TO PROVIDE THE
25 UNDER-SIGNED WITH A COPY OF YOUR RESPONSE WITHIN FOURTEEN
26 (14) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A
27 WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN
28 FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION MAY
RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT
WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING DATE.

1 PLEASE TAKE NOTICE that the undersigned will bring the foregoing
2 *Motion* on for hearing before the Honorable Denise L. Gentile, in Dept. F,
3 Courtroom #3 of the Eighth Judicial District Court, Family Division located at 601
4 N. Pecos Road, Las Vegas, Nevada on the ____ day of _____, 2020, at
5 _____ a.m./p.m. of said day, or as soon thereafter as counsel may be
6
7 heard.

8
9 COMES NOW the Defendant, Amanda Reed, by and through her attorney,
10 Carrie J. Primas, Esq., of Hanratty Law Group, and hereby moves the Court for an
11 order granting the following:

- 12
13 1. Adopting Dr. Paglini's recommendations;
14 2. Issuing an Order to Show Cause why Plaintiff should not be held in
15 contempt for Court for violation of the Mutual Behavior Order and
16 other Orders of this Court;
17 3. Modifying custody; and
18 4. Awarding Defendant attorney fees and costs.
19 5. For such other and further relief as the Court deems just and proper.

20 This Motion is made and based on the attached Points and Authorities,
21 Declaration of Amanda Reed, all papers and pleadings on file herein and argument
22 of counsel at the hearing on this matter.

23 DATED this 8th day of April, 2020.

24 **HANRATTY LAW GROUP**

25 

26 Carrie J. Primas, Esq.
27 Nevada Bar No. 12071
28 1815 Village Center Circle, Suite 140
Las Vegas, Nevada 89134
Attorneys for Defendant, Amanda Reed

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **Statement of Facts**

4 The Parties, Plaintiff Devin Reed (“Devin”) and Defendant Amanda Reed
5 (“Amanda”) were married on the 2nd day of October, 2008, and divorced pursuant
6 to a Decree of Divorce filed April 6, 2020. There are two (2) minor children born
7 the issue of the marriage, to wit: Abigail Reed (“Abby”), born April 6, 2013; and
8 Shawn Reed, born July 3, 2015.
9

10
11 A. Procedural History

12 The following stipulated order was entered after the parties’ October 16,
13 2018, hearing:
14

- 15 1. The parties share joint legal and joint physical custody of the minor
16 children.
17
18 2. The parties shall abide by a Mutual Behavior Order, which shall extend to
19 any third-party of family members of the parties.
20
21 3. The parties shall be responsible for transporting the minor children to all
22 extracurricular activities during their parental timeshare. This provision
23 does not require that the activities be previously agreed upon between the
24 parties.

25 Additionally, this Order incorporated a previous order made on August 14,
26 2018, that there shall be no overnights for [Devin’s] minor child (Jacob) during his
27
28

1 parental timeshare with the minor children.

2 On December 12, 2018, Amanda filed a Motion to Enforce the Mutual
3 Behavior Order and For an Order to Show Cause Why Devin Shouldn't be Held in
4 Contempt, due to his repeated violations of the Mutual Behavior Order. At a
5 hearing held on January 22, 2019, Amanda's request for an Order to Show Cause
6 was denied, and Devin was admonished to follow the Behavioral Order.
7

8
9 On March 8, 2019, by way of a Countermotion, Amanda requested that she
10 be awarded primary physical custody of the minor children and that a Custodial
11 Evaluation be performed. This request was denied via a Minute Order issued by the
12 Court on April 8, 2019.
13

14 On June 21, 2019, Amanda filed a Notice of Appeal and Case Appeal
15 Statement, appealing this Court's denial of Amanda's request to modify custody.
16

17 On July 25, 2019, Amanda filed a Motion for Order to Show Cause, for
18 Leave to Amend Counterclaim, for a Modification of Custody, to Continue Trial,
19 and for Attorney's Fees and Costs. Amanda's request to modify custody was based
20 on numerous acts of domestic violence against her by Devin that were not
21 previously presented to the Court.
22

23 On August 12, 2019, Amanda filed a Motion to Compel Discovery.

24 At a hearing on August 27, 2019, the parties **stipulated**, in pertinent part, as
25 follows:
26
27
28

1 1. Amanda will dismiss the pending appeal and withdraw the Motion to
2 Compel Discovery.

3
4 2. Dr. Paglini will perform a child custody evaluation. **If there are no**
5 **issues found**, it is agreed that the parties will continue to follow the
6 current custodial arrangement.

7
8 Also, at the hearing on August 27, 2019, the Court set a return hearing for
9 December 3, 2019, to determine if there is enough to proceed on a custody
10 modification. This return date was ultimately continued to January 29, 2020, due to
11 numerous requests by Dr. Paglini for additional time.
12

13 On January 27, 2020, Dr. Paglini's Custody Evaluation was received by the
14 parties and the Court.

15 At the hearing on January 29, 2020, the Court made no determination as to
16 whether Dr. Paglini's report provided enough information to proceed on a custody
17 modification, and instead indicated that it would set a one-hour session at some
18 point in the future to discuss further proceedings. No such further proceedings have
19 been set to date.
20
21

22 On February 11, 2020, the parties attended a Senior Judge Settlement
23 Conference and resolved the remaining financial issues. The Decree of Divorce
24 was filed on April 6, 2020. The custody order remained unchanged.
25

26 \\\