

IN THE SUPREME COURT OF THE STATE OF NEVADA

AMANDA REED,

Appellant,

vs.

DEVIN REED,

Respondent.

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Jan 10 2022 11:12 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
CASE NO. 83514
District Court Case No:
D-14-499144-D

APPELLANT'S APPENDIX - VOL IV

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11	Plaintiff's Pre-Trial Memorandum	6.10.2019	II	APPX0430 - APPX0432
13	Plaintiff's Pre-Trial Memorandum	2.18.2021	V	APPX1156 - APPX1169
14	Plaintiff's Supplemental Exhibit In Support of Motion	2.14.2019	II	APPX0255 - APPX0257
16	Plaintiff's Supplemental Plea for Relief	7.2.2020	IV	APPX0924 - APPX0949
18	Receipt of Copy	6.21.2018	I	APPX0056
19	Receipt of Copy	5.13.2019	II	APPX0419
20	Receipt of Copy	8.22.2019	III	APPX0567
21	Receipt of Copy	2.22.2021	V	APPX1171
22	Re-Notice of Motion	9.28.2020	V	APPX1109
23	Reply to Opposition and Countermotion	3.19.2019	II	APPX0406 - APPX0409
24	...			
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1	Reply to Plaintiff's	8.22.2019	III	APPX0572 -
2	Opposition to Motion for			APPX0580
3	an Order to Show Cause			
4	Why Plaintiff Should			
5	Not Be Held In Contempt			
6	of Court; for Leave to			
7	Amend Counterclaim; for			
8	a Modification of Custody;			
9	to Continue Trial; and			
10	for Attorney Fees and			
11	Costs; and Opposition to			
12	Plaintiff's Countermotion			
13	for Attorney's Fees and			
14	Costs, and for Related			
15	Relief			
16	Reply to Plaintiff's	4.23.2021	VI	APPX1231 -
17	Opposition to Motion for			APPX1245
18	Reconsideration of the			
19	Court's Order from the			
20	February 25, 2021 Hearing;			
21	and Opposition to Plaintiff's			
22	Countermotion for Revised			
23	Custodial Timeshare,			
24	School Placement, to Resolve			
25	Parent-Child Matters, and			
26	for Attorney Fees and			
27	Costs			
1	Reply to Plaintiff's	5.7.2020	IV	APPX0815 -
2	Opposition to Motion to			APPX0832
3	Adopt Dr. Paglini's			
4	Recommendation; for an			
5	Order to Show Cause Why			
6	Plaintiff Should Not Be			
7	Held In Contempt of Court;			
8	to Modify Custody; and for			
9	Attorney Fees and Costs;			
10	and Opposition to Plaintiff's			
11	Countermotion for			
12	Protective Order On Behalf			
13	of the Parties' Minor Children;			
14	for an Order Sealing Case			
15	File; for an Order Requiring			
16	Defendant to Obtain Court			
17	Approval Prior to Filing			
18	Future Motions; to Declare			
19	Defendant a Vexatious			
20	Litigant; for Sanctions, Fees,			
21	and Costs; and for Related			
22	Relief			

1	Request for Child Protection Services Appearance and Records	1.22.2019	I	APPX0228
2				
3	Request for Issuance of Joint Preliminary Injunction	3.20.2018	I	APPX0006
4	Stipulation and Order for Custody Evaluation	9.19.2019	III	APPX0590 - APPX0591
5				
6	Stipulation and Order for Release of CPS Records	1.23.2020	III	APPX0605 - APPX0607
7	Stipulation and Order Regarding Child Support Arrears and Child Support	6.17.2021	VI	APPX1269 - APPX1271
8				
9	Stipulation and Order to Continue Hearing	12.10.2019	III	APPX0601 - APPX0602
10				
11	Stipulation and Order to Continue June 26, 2018 Hearing	6.28.2018	I	APPX0105 - APPX0106
12				
13	Stipulation and Order to Continue Order to Show Cause Hearing	7.30.2020	IV	APPX0967 - APPX0969
14				
15	Stipulation and Order to Continue Trial	10.01.2020	V	APPX1116 - APPX1118
16	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	8.22.2019	III	APPX0582 - APPX0587
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21	Supplement to Defendant's Motion to Enforce; for an Order to Show Cause Why Plaintiff Should Not Be Held in Contempt of Court; for Clarification; and for Attorney Fees and Costs	1.11.2019	I	APPX0199 - APPX0222
22				
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1	Supplement to Defendant's	3.18.2019	II	APPX0400 -
2	Opposition to Plaintiff's			APPX0405
3	Motion to Dem Defendant A			
4	Vexatious Litigant; for an			
5	Order that Defendant's Father			
6	Stay Away from Plaintiff			
7	Pursuant to the Behavior			
8	Order; for Return of Personal			
9	Property; for Attorney's			
10	Fees and Costs and Other			
11	Related Matters; and			
12	Countermotion for Joint Legal			
13	and Primary Physical Custody			
14	of the Minor Children,			
15	Child Custody Evaluation,			
16	Child Support, Exclusive			
17	Possession, and for Attorney			
18	Fees and Costs			
19	Supplemental Certificate of	4.13.2020	IV	APPX0769
20	Service			
21	Transcript Re: All Pending	12.15.2021	VI	APPX1343 -
22	Motions			APPX1365
23	Transcript Re: All Pending	12.15.2021	VI	APPX1366 -
24	Motions			APPX1397
25	Transcript Re: All Pending	12.15.2021	VI	APPX1398 -
26	Motions			APPX1436
27	Transcript Re: All Pending	12.15.2021	VII	APPX1510-
28	Motions			APPX1548
29	Transcript Re: Non-Jury	12.15.2021	VII	APPX1437-
30	Trial			APPX1509
31	...			
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AFFIRMATION

(Pursuant to NRS 239B.030)

The undersigned does hereby affirm that the preceding documents
filed in the above-referenced matter does not contain the social security number
of any person.

DATED this 10 day of January, 2022.

KAINEN LAW GROUP, PLLC

By: /s Racheal H. Mastel
RACHEAL H. MASTEL, ESQ.
Nevada Bar No. 11646
Attorneys for Appellant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10 day of January, 2022, I caused to be served the *Appellant's Appendix - Vol IV* to all interested parties as follows:

____ BY MAIL: Pursuant to NRCP 5(b), I caused a true copy thereof to be placed in the U.S. Mail, enclosed in a sealed envelope, postage fully prepaid thereon, addressed as follows:

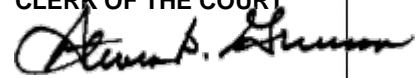
____ BY CERTIFIED MAIL: I caused a true copy thereof to be placed in the U.S. Mail, enclosed in a sealed envelope, certified mail, return receipt requested, postage fully paid thereon, addressed as follows:

____ BY FACSIMILE: Pursuant to EDCR 7.26, I caused a true copy thereof to be transmitted, via facsimile, to the following number(s):

X BY ELECTRONIC MAIL: Pursuant to EDCR 7.26 and NEFCR Rule 9, I caused a true copy thereof to be served via electronic mail, via Wiznet, to the following e-mail address(es):

Michancy Cramer
Alex Ghibaud

/s Racheal H. Mastel
An Employee of
KAINEN LAW GROUP, PLLC




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

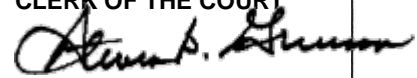
DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

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

I hereby certify that I am an employee of Hanratty Law Group, and on the 9th day of April, 2020, I placed a true and correct copy of the *Notice of Hearing* in the United States Mail at Las Vegas, Nevada, with postage prepaid, and addressed as follows:

Devin Reed
4518 E. Carol Cir.
Las Vegas, Nevada 89120
Plaintiff in Proper Person

By: 
Employee of Hanratty Law Group



CSERV
HANRATTY LAW GROUP
Carrie J. Primas, Esq.
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Las Vegas, Nevada 89134
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EMAIL: attorneys@hanrattylawgroup.com
Attorneys for Defendant, Amanda Reed

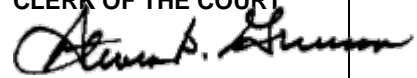
DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

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

I hereby certify that I am an employee of Hanratty Law Group, and on the 9th day of April, 2020, I placed a true and correct copy of the *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* in the United States Mail at Las Vegas, Nevada, with postage prepaid, and addressed as follows:

Devin Reed
4518 E. Carol Cir.
Las Vegas, Nevada 89120
Plaintiff in Proper Person

By: Kari Collis
Employee of Hanratty Law Group



1 **EPAO**
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 PH: (702) 821-1379
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9 EMAIL: attorneys@hanrattylawgroup.com
10 Attorneys for Defendant, Amanda Reed


7
8 **DISTRICT COURT**
9
10 **CLARK COUNTY, NEVADA**

11 DEVIN REED,) Case No: D-18-568055-D
12) Dept No: F
13 Plaintiff,)
14 v.) **EX PARTE APPLICATION FOR AN**
15) **ORDER TO SHOW CAUSE**
16 AMANDA REED,)
17)
18 Defendant.)
19)

20 COMES NOW Defendant, Amanda Reed, by and through her attorney of record, Carrie J.
21 Primas, Esq., of Hanratty Law Group, hereby moves this Court for an issuance of an Order to
22 Show Cause directed to the Plaintiff pursuant to EDCR 5.509(b). This application is based on the
23 pleadings and papers on file and the Declaration attached to this application.

24 Dated this 10th day of April, 2020.

25 **HANRATTY LAW GROUP**

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

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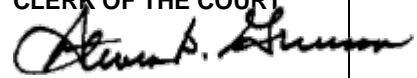
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Hanratty Law Group, and on the 10th day of April, 2020, I placed a true and correct copy of the *Ex Parte Application for Order to Show Cause* in the United States Mail at Las Vegas, Nevada, with postage prepaid, and addressed as follows:

Devin Reed
4518 E. Carol Cir.
Las Vegas, Nevada 89120
Plaintiff in Proper Person

By: Kari Colli
Employee of Hanratty Law Group



1 **EPAO**
2 **HANRATTY LAW GROUP**
3 Carrie J. Primas, Esq.
4 State Bar of Nevada No. 12071
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8 FAX: (702) 870-1846
9 EMAIL: attorneys@hanrattylawgroup.com
10 Attorneys for Defendant, Amanda Reed

7
8 **DISTRICT COURT**
9
10 **CLARK COUNTY, NEVADA**

11	DEVIN REED,)	Case No: D-18-568055-D
12)	Dept No: F
13	Plaintiff,)	
14	v.)	EX PARTE APPLICATION FOR AN
15)	ORDER SHORTENING TIME ON
16	AMANDA REED,)	DEFENDANT'S MOTION TO ADOPT
17)	DR. PAGLINI'S RECOMMENDATION;
18	Defendant.)	FOR AN ORDER TO SHOW CAUSE
19)	WHY PLAINTIFF SHOULD NOT BE
20)	HELD IN CONTEMPT OF COURT; TO
21)	MODIFY CUSTODY; AND FOR
22)	ATTORNEY FEES AND COSTS

23 COMES NOW Defendant, Amanda Reed, by and through her attorney of record, Carrie J.
24 Primas, Esq., of Hanratty Law Group, hereby moves this Court for an Order Shortening Time on
25 her *Motion to Adopt Dr. Paglini's Recommendation; for an Order to Show Cause Why Plaintiff*
26 *Should Not Be Held in Contempt of Court; to Modify Custody; and for Attorney Fees and Costs.*

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1 This Application for an Ex Parte Order Shortening Time on Defendant's Motion is based
2 upon the Affidavit of Carrie J. Primas, Esq. Moreover, this Application is made and based upon
3 all the papers, pleadings and records on file herein, as well as the Points and Authorities attached
4 hereto.

5 Dated this 10th day of April, 2020.

6 **HANRATTY LAW GROUP**

7
8 By: Carrie Primas
9 Carrie J. Primas, Esq.
10 Nevada Bar No. 12071
11 1815 Village Center Circle, Suite 140
12 Las Vegas, Nevada 89134
13 PH: (702) 821-1379
14 FAX: (702) 870-1846
15 EMAIL: attorneys@hanrattylawgroup.com
16 Attorneys for Defendant, Amanda Reed
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1 POINTS AND AUTHORITIES

2 I.

3 Points and Authority

4 Eighth Judicial District Court Rule (“EDCR”) 5.31 states in pertinent part:

5 Ex Parte motions to shorten time may not be granted except upon
6 affidavit or certificate of counsel . . . describing the circumstances
7 claimed to constituting good cause and justifying shortening time.

8 The minor children are being neglected and suffering emotional damage during Devin’s
9 custodial time. Devin fails to provide adequate care for the minor children, including, but not
10 limited to, the children going unfed, being clothed in dirty clothing or clothing that is too small,
11 being unbathed, and having poor oral hygiene. The minor child, Abby, becomes hysterical at
12 custodial exchanges, and Devin recently took a gun out of a safe and placed it next to Abby as he
13 told her that she must behave at exchanges.

14 The ongoing neglect and emotional damage of the children is of great concern and needs
15 to be addressed forthwith to protect the well-being of the children.
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