

1 II.

2 Conclusion

3 Based on the aforementioned reasons, it is respectfully requested that this Court enter an
4 Order Shortening Time on Defendant's *Motion to Adopt Dr. Paglin's Recommendation for an*
5 *Order to Show Cause Why Plaintiff Should Not Be Held in Custody; and for Attorney Fees and Costs.*
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Dated this 10th day of April, 2020.

HANRATTY LAW GROUP

By: Carrie Primas
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Attorneys for Defendant, Amanda Reed

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1. I, Carrie J. Primas, Esq., the Defendant's attorney in the above referenced matter and I can attest to the below reference facts as being true and correct to the best my knowledge as represented by my client.

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

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

FURTHER AFFIANT SAYETH NAUGHT.

Carrie J. Primas, Esq.

Subscribed and Sworn to before me this
10th day of April, 2020.

Karin A. Collins
Notary Public in and for said County
And State



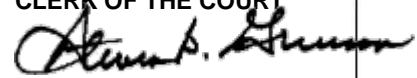
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CERTIFICATE OF SERVICE

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 *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: Kari Collis
Employee of Hanratty Law Group



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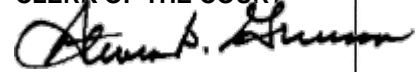
DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

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 13th 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
9425 W. La Madre Way
Las Vegas, Nevada 89149
Plaintiff in Proper Person

By: 
Employee of Hanratty Law Group



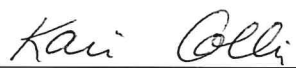
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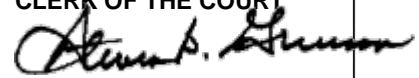
DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

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 13th day of April, 2020, I placed a true and correct copy of the *Exhibits in Support of Defendant's 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
9425 W. La Madre Way
Las Vegas, Nevada 89149
Plaintiff in Proper Person

By: 
Employee of Hanratty Law Group




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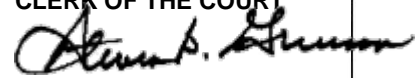
DISTRICT COURT
CLARK COUNTY, NEVADA

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 13th 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
9425 W. La Madre Way
Las Vegas, Nevada 89149
Plaintiff in Proper Person

By: 
Employee of Hanratty Law Group



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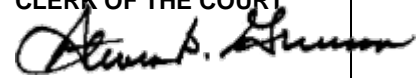
DISTRICT COURT
CLARK COUNTY, NEVADA

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 13th day of April, 2020, I placed a true and correct copy of the *Declaration of Amend Reed in Support of 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
9425 W. La Madre Way
Las Vegas, Nevada 89149
Plaintiff in Proper Person

By: 
Employee of Hanratty Law Group



DECL
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Attorneys for Defendant, Amanda Reed

DISTRICT COURT
CLARK COUNTY, NEVADA

DEVIN REED,)	Case No: D-18-568055-D
)	Dept No: F
Plaintiff,)	
)	
v.)	
)	DECLARATION OF AMANDA REED IN
AMANDA REED,)	SUPPORT OF MOTION TO ADOPT DR.
)	PAGLINI'S RECOMMENDATION; FOR
Defendant.)	AN ORDER TO SHOW CAUSE WHY
)	PLAINTIFF SHOULD NOT BE HELD IN
)	CONTEMPT OF COURT; TO MODIFY
)	CUSTODY; AND FOR ATTORNEY FEES
)	AND COSTS

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 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*, 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

1 set forth in full.

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

6
7 3. The following stipulated order was entered after the October 16, 2018, hearing
8 filed on February 27, 2019:

9 a. The parties share joint legal and joint physical custody of the minor children.

10 b. The parties shall abide by a Mutual Behavior Order, which shall extend to any
11 third-party of family members of the parties (page 2, lines 14-16).

12 c. The parties shall be responsible for transporting the minor children to all
13 extracurricular activities during their parental timeshare (page 2, lines 17-18).

14 This provision does not require that the activities be previously agreed upon
15 between the parties.

16
17 4. Additionally, this Order incorporated a previous order made on August 14, 2018
18 (filed on September 19, 2018), that there shall be no overnights for [Devin’s]
19 minor child (Jacob) during his parental timeshare with the minor children (page 5,
20 lines 1-3).

21 5. On December 12, 2018, I filed a Motion to Enforce the Mutual Behavior Order
22 and For an Order to Show Cause Why Devin Shouldn’t be Held in Contempt, due
23 to his repeated violations of the Mutual Behavior Order. At a hearing held on
24 January 22, 2019, my request for an Order to Show Cause was denied, and Devin
25 was admonished to follow the Behavioral Order.
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- 1 6. On March 8, 2019, by way of a Countermotion, I requested that I be awarded
2 primary physical custody of the minor children and that a Custodial Evaluation be
3 performed. This request was denied via a Minute Order issued by the Court on
4 April 8, 2019.
- 5 7. On June 21, 2019, I filed a Notice of Appeal and Case Appeal Statement,
6 appealing this Court's denial of my's request to modify custody.
- 7 8. On July 25, 2019, I filed a Motion for Order to Show Cause, for Leave to Amend
8 Counterclaim, for a Modification of Custody, to Continue Trial, and for Attorney's
9 Fees and Costs. My request to modify custody was based on numerous acts of
10 domestic violence against me by Devin that were not previously presented to the
11 Court.
- 12 9. On August 12, 2019, I filed a Motion to Compel Discovery.
- 13 10. At a hearing on August 27, 2019, Devin and I **stipulated**, in pertinent part, as
14 follows:
15 a. I will dismiss the pending appeal and withdraw the Motion to Compel
16 Discovery.
17 b. Dr. Paglini will perform a child custody evaluation. **If there are no issues**
18 **found**, it is agreed that we will continue to follow the current custodial
19 arrangement.
20 11. Also, at the hearing on August 27, 2019, the Court set a return hearing for
21 December 3, 2019, to determine if there is enough to proceed on a custody
22 modification. This return date was ultimately continued to January 29, 2020, due
23 to numerous requests by Dr. Paglini for additional time.
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12. On January 27, 2020, Dr. Paglini's Custody Evaluation was received by the parties and the Court.
13. At the hearing on January 29, 2020, the Court made no determination as to whether Dr. Paglini's report provided enough information to proceed on a custody modification, and instead indicated that it would set a one-hour session at some point in the future to discuss further proceedings. No such further proceedings have been set to date.
14. On February 11, 2020, we attended a Senior Judge Settlement Conference and resolved the remaining financial issues. The Decree of Divorce was filed on April 6, 2020. The custody order remained unchanged.
15. The Custody Evaluation raises serious concerns about the fitness of Devin to maintain joint physical custody and the safety of the children in his care. The Evaluation cites numerous instances of domestic violence by Devin against me, many of which were caught on audio or video recording. Each time Dr. Paglini attempted to play such recordings for Devin, Devin would refuse to listen, insisting that Dr. Paglini turn it off and subsequently refusing to acknowledge that any abuse occurred.
16. Dr. Paglini expressed the importance of the domestic violence history in his Recommendations: "**I have serious concerns about Mr. Devin Reed.** Domestic Violence was evident in their relationship. Mr. Reed appeared abusive, threatened her with a gun and he was degrading." *See* Custody Evaluation at pg. 56. *Emphasis Added.* Dr. Paglini noted that the only reason he did not make a recommendation related to physical custody based on these concerns was because he did not know if the Court would consider previous domestic violence as a

1 benchmark to change custody.

2 17. Dr. Paglini then made three (3) very specific recommendations:

3 a. It is recommended that Ms. Reed is allowed sole legal custody **due to the**
4 **historic abuse patterns by Mr. Reed.** It is hard to coparent with a person
5 who has resorted to violent patterns and is verbally degrading. If the courts
6 implement sole legal custody for Ms. Amanda Reed, Mr. Devin Reed should
7 be constantly informed of educational, medical, and recreational activities....It
8 is difficult to coparent with an individual who was previously abusive,
9 **demonstrates poor insight, and projects blame onto the victim.”**

10 b. Mr. Reed should complete minimally 20 sessions of anger management. Mr.
11 Reed also should complete extensive parenting courses. Prognosis for Mr.
12 Reed is guarded.

13 c. It is advisable that Abigail should remain in therapy with Dr. Lisa Shaffer as
14 Abigail has **witnessed domestic violence between her parents** and has been
15 emotionally affected. Therapy allows her a safe setting to process her feelings.

16 *See Custody Evaluation at pg. 56. Emphasis Added.*

17 18. As noted above, Devin and I stipulated on August 14, 2018, that Devin’s son,
18 Jacob, would not have overnight visitation during Devin’s custodial time with the
19 minor children. This Order has always remained in effect. We agreed to this
20 provision because, during our marriage, Jacob exhibited concerning behavior that
21 caused us to agree that he would not spend the night at our house, be unattended
22 with the minor children, or ever be in a room with a closed door. That behavior
23 included harming and killing animals, writing about raping women, and writing
24 about killing Devin and I. However, Devin continues to have Jacob in his home
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overnight during his custodial time; Jacob stayed at Devin's home the entirety of the summer of 2019.

19. During the time Jacob was living with Devin, and when he spends the night, the children have to share a bed with Devin. They have told me that if they kick their dad while they are sleeping, he screams at them and tells them that if they don't stay still, he is going to make them sleep with Jacob. Abby has told me that Shawn sucks on and licks Jacob's arm and neither Devin nor Jacob discourage this behavior. On February 10, 2020, Shawn told me that he was alone with Jacob overnight, and that Jacob pinched Shawn and tried to bite him. When Shawn tried to find Devin to help him, he was nowhere to be found.

20. Devin has shown his complete lack of respect for this Court's Order by not only allowing Jacob to have overnights during his custodial time, but by admitting the same in his Opposition to Motion for Order to Show Cause filed August 19, 2019, in which he specifically stated on page 5, "This year Dad received visitation with Jacob for the first two weeks of June. Thus, **Jacob stayed at Dad's house for those two weeks.**"

21. Pursuant to the Order from the August 14, 2018, hearing, all communication between Devin and I is to be through Our Family Wizard only, except for emergencies related to the minor children. This Order is reiterated in the Decree of Divorce. Devin continues to communicate with me via text message in violation of that order, as follows:

a. September 14, 2019: "I miss you. I miss your voice. I miss your smile. I miss your smell. I miss your hug. I miss your jokes. I miss how you made me feel."

1 b. September 15, 2019: "I get lonely. It goes away."

2 c. April 1, 2020: "You suck at life. Ugly a**."

3 22. Devin has also violated the Mutual Behavior Order as well as the order regarding
4 transporting the minor children to extra-curricular activities. Regarding the
5 Mutual Behavior Order, Devin has violated the following provisions:

6 2. You shall avoid unnecessary contact with the other party's family, friends,
7 associates, neighbors, co-workers, "significant other," etc., and you shall not
8 initiate conflicts with them.

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

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

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

24 24. The Mutual Behavior Order also provides that neither party shall "engage in any
25 abusive contact (foul language, name calling, etc.) with the other party of
26 child(ren), including telephone calls, letters, email, etc." Devin continues to
27 violate this provision with volatile, abusive communications on Our Family
28 Wizard and via text message. The following are a small example of this behavior:

- 1 a. September 10, 2019: "Stop recording me like an a**hole. You suck."
- 2 b. November 28, 2019: "You are an a**hole... Yes I'm calling you an
- 3 a**hole. Let it go a**hole."
- 4 c. December 15, 2019: "You are super weird."
- 5 d. January 25 2020: "You think I'm joking a**hole? Never again b*tch. This
- 6 is your fault. Pay me."
- 7
- 8 e. January 26, 2020: "It's in your best interest to back down. Don't make this
- 9 worse than it already is....back down a**hole. I'm serious. You won't
- 10 like what happens if this goes in your favor."
- 11 f. March 5, 2020: "GTFO you can post that sh*t to your Facebook groups to
- 12 believe your lies but it is all bullsh*t lies."
- 13 g. March 6, 2020: "Why are you such a liar?...You are so weird to hide like
- 14 that today, you have mental issues Amanda...get a life. You are super
- 15 weird."
- 16 h. March 7, 2020: "...you stay stuck on being an entitled b*tch...You mom
- 17 wrong you suck at it."
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- 19 i. March 7, 2020: At a custodial exchange, in front of the children, Devin
- 20 calls my dad an old a** man, tells him to shut the f*ck up, and challenges
- 21 him to a fight. A video of this exchange is available for the Court's review.
- 22 j. March 9, 2020: "Stop being the weirdo parent...I have joint and I am
- 23 thinking about getting more time and I will get it...Have that [douchebag]
- 24 husband/dad of yours step the H*ll off. I know he is your lapdog b*tch
- 25 does all your bidding and probably more, its sickening. What a loser."
- 26
- 27 k. March 26, 2020: "Please just stop with the f*cking harassment of my 93
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1 year old grandmother!!! Jeezus just f*cking stop!!...She doesn't need you
2 sending any of your f*cking drama to her...You are immature and
3 throwing a tantrum like a child all of our whole divorce was you throwing
4 a giant tantrum."

- 5
6 1. April 3, 2020: At a custodial exchange, in front of the children, Devin
7 yelled to my dad, "Shut the f*ck up old man. What you f*cking dick? Shut
8 the f*ck up. Do you guys jerk off to these videos? You guys are so weird."
9 tells him to shut the f*ck up, and challenges him to a fight. A video of this
10 exchange is available for the Court's review.

- 11 25. Also pursuant to the order from October 16, 2018, and confirmed in the Decree of
12 Divorce, Devin and I are required to transport the minor children to their
13 extracurricular activities. The following are incidents on which Devin has refused
14 to do so because he is unhappy with me.

15 a. On May 21, 2019, Abby had a Girl Scout meeting during Devin's custodial
16 time, which I confirmed via Our Family Wizard on April 29, 2019. On May 11,
17 2010, Devin booked a trip to South Carolina, and subsequently learned that he
18 would miss Abby's Kindergarten graduation. Devin blamed me for missing
19 Abby's graduation, and subsequently refused to take Abby to her Girl Scout
20 meeting on May 21, 2019.

21
22 b. On September 21, 2019, Devin refused to bring Abby to her cheerleading
23 practice because he did not like that my dad was present at the parties' custodial
24 exchange.

25 c. September 24, 2019: Devin refused to take the children to a Girl Scout
26 event that he previously agreed to take them to.
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1 d. On November 15, 2019, Devin refused to take Abby to Girl Scouts.

2 e. On January 26, 2020, Devin refused to take Abby to a game she was
3 required to attend for cheerleading.

4 26. The following financial orders are included in the parties' Decree of Divorce: (1)
5 the parties are to abide by the 30/30 Rule for unreimbursed medical expenses
6 (page 5, lines 21-28, page 6, lines 1-7); (2) Devin is to pay child support in the
7 amount of \$350.00 per months (page 5, lines 14-17); and (3) Devin is to pay to me
8 \$7,500.00 at the rate of \$208.33 per month until paid in full, beginning March 1,
9 2020 (page 11, lines 22-26).

10 27. As of the filing of this Motion, Devin has failed to pay his share of unreimbursed
11 medical expenses incurred since February 11, 2020; child support for the month of
12 April; and the payment of \$208.33.00 for the months of March and April.
13 Regarding the unreimbursed medical expenses, I have incurred an expense in the
14 amount of \$15.06 on March 3, 2020, requested reimbursed from Devin on the
15 same day, and as of April 7, 2020, more than thirty (30) days later, no
16 reimbursement has been paid.

17 28. As I have expressed in previous Motions before this Court, Devin continues to
18 provide inadequate care to the minor children during his custodial time. It is clear
19 that he is unable to get the kids ready for school. He constantly drops the children
20 off to school dirty, unfed, in pajamas or clothes that are too small, with their teeth
21 and hair unbrushed. I brush and fix Abby's hair every day, even on Devin's
22 custodial days, because he does not, and has been doing so since October, 2018. If
23 the children arrive to school early enough, I brush their teeth; I keeps toothbrushes
24 for them at school specifically so I can do so. The children have told me that they
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only brush their teeth on Sundays when they take a shower.

29. Since Devin began working again, his son, Daniel, drops the children off. Devin makes the children sleep in their clothes so that Daniel does not have to dress them in the morning. Daniel wakes them up and immediately puts them in the car, without feeding them or allowing them to even use the bathroom. The children often arrive at school in clothes that are dirty or too small. On numerous occasions Shawn has arrived at school with food on his face and clothes from dinner the night before. When I get the children back after Devin's three-day custodial period, they are often wearing the same underwear, and sometimes even the same clothes, as the beginning of his custodial time. At the Court's request, I am prepared to provide videos of the children being dropped off to her at school, asking to brush their teeth and in desperate need of using the bathroom. In one such video, Abby's pants are so tight they will not even button.

30. Devin has begun using food as a weapon, telling Abby that he will only give her food if she is good when he picks her up. Further, Shawn constantly arrives at school visibly upset, and the children are often dropped off late. Devin is aware that I am waiting for the children to be dropped off, as I am the one who receives them at the school's front doors, but Devin does not notify me when they will be late or when they will arrive.

31. Due to his violent behavior and failure to adequately care for the children, including withholding food, Abby continuously refuses to go with Devin for his custodial time. Devin makes no effort to retrieve Abby from me; while Abby clings to my leg and I repeatedly tells her she has to go with Devin, Devin simply stands back and says, "let's go Abby." On numerous occasions, Devin has simply

1 left without Abby, then alleged that I have withheld visitation. On other
2 occasions, Devin throws Abby in the front seat of his truck and drives away
3 quickly, without her even buckled let alone in an appropriate car seat.

4 32. Abby is hysterical during these custodial exchanges. On at least one occasion,
5 after putting Abby in the car, Devin asked me to come to his car as Abby wanted a
6 kiss from her. While giving her a hug and kiss through the window, Abby told
7 me, through tears, that Devin had said he was going to hit her when they got home.
8

9 33. Devin blames Abby's refusal to go with him on me, but even when I am not
10 around, Abby refuses. When Devin picks the children up from school, he gets
11 them straight from Safekey and I am not part of the exchange, yet still Abby
12 refuses. On numerous occasions Devin has told me to come get Abby because she
13 will not stop crying and will not go with him.

14 34. On one occasion Abby ran away from Devin and hid from him inside of the
15 school; I had already left, but Devin sent me a text message alleging that I was still
16 at the school and had hidden my car. Devin ultimately found Abby after about an
17 hour; he then told Abby, in the presence of a teacher at the school, that Shawn had
18 been locked in the car by himself the entire time. Devin never informed me that he
19 did find Abby and have her in his care. Later that night, Abby called me
20 extremely upset, telling me that she was "not ok." The phone then hung up.
21 Devin then sent me a text message stating, "Well I will never let them call you to
22 make them feel better ever again."
23

24 35. On or about March 24, 2020, when Devin got the children to his house to start
25 visitation, Devin took Abby into his bedroom, took a gun from his safe, and set it
26 next to her. He told Abby that if things get worse, he will use it. According to
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1 Abby, after she had sat on the bed with the gun for a little bit, Devin put it back in
2 the safe. He then told Abby that she can't cry at exchanges anymore and she has
3 to be good.

4 36. When I am present for the custodial exchange, I have to physically force Abby,
5 who is always sobbing hysterically, to go with Devin. I have to either force her
6 into Devin's car, or Devin has to pull her off of me and force her into his car.
7 Abby is clearly traumatized, which is confirmed by Dr. Paglini's comments about
8 the necessity of her continuing in therapy, and is only becoming more traumatized
9 by the nature of the custodial exchanges and Devin's ongoing threats of physical
10 harm.
11

12 **I declare under the penalty of perjury under the law of the State of Nevada that the**
13 **foregoing is true and correct.**

14 Dated this 13th day of April, 2020.

15
16 
17 Amanda Reed

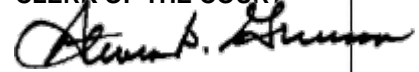
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Hanratty Law Group, and on the 13th day of April, 2020, I placed a true and correct copy of the *Declaration of Amend Reed in Support of 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



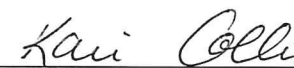
CSERV
HANRATTY LAW GROUP
Carrie J. Primas, Esq.
State Bar of Nevada No. 12071
1815 Village Center Circle, Suite 140
Las Vegas, Nevada 89134
PH: (702) 821-1379
FAX: (702) 870-1846
EMAIL: attorneys@hanrattylawgroup.com
Attorneys for Defendant, Amanda Reed

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

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

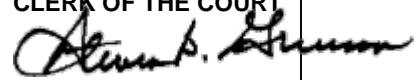
I hereby certify that I am an employee of Hanratty Law Group, and on the 13th day of April, 2020, I placed a true and correct copy of the *Notice of Motion and Motion to Adopt Dr. Paglini's Recommendation; for an Order to Show Cause Why Plaintiff Should Not Be Held in Contempt of Court; to Modify Custody; and for Attorney Fees and Costs* in the United States Mail at Las Vegas, Nevada, with postage prepaid, and addressed as follows:

Devin Reed
9425 W. La Madre Way
Las Vegas, Nevada 89149
Plaintiff in Proper Person

By: 
Employee of Hanratty Law Group

DISTRICT COURT
CLARK COUNTY, NEVADA

Electronically Filed
4/20/2020 1:47 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 Plaintiff s Opposition to Defendant s Motion to Adopt Dr. Paglini s Recommendations; for an Order to Show Cause Why Plaintiff Should Not be Held in Contempt of Court; to Modify Custody; and for Attorney s Fees and Costs; and Countermotion for a Protective Order on Behalf of the Parties Minor Children; for an Order Sealing the Parties Case File; for an Order Requiring Defendant to Obtain Court Approval Prior to Filing Future Motions; to Declare Defendant a Vexatious Litigant; for Sanctions, Fees, and Costs; and for Other Related Relief 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/ Sylvia Fussell
Deputy Clerk of the Court

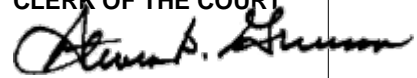
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CERTIFICATE OF SERVICE

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/ Sylvia Fussell
Deputy Clerk of the Court



1 **OPPC**

2 **Devin Reed**

3 9425 West La Madre Way

4 Las Vegas, Nevada 89149

5 Telephone: (702) 890-1190

6 Email: devinreed2003@gmail.com

7 *Plaintiff in Proper Person*

8
9 **EIGHTH JUDICIAL DISTRICT COURT**
10 **FAMILY DIVISION**
11 **CLARK COUNTY, NEVADA**
12

13 DEVIN REED,

14 Plaintiff,

15 vs.

16 AMANDA REED,

17 Defendant.

Case Number: D-18-568055-D

Department: F

Hearing Date: May 13, 2020

Hearing Time: 9:30 a.m.

18 **OPPOSITION TO DEFENDANT'S MOTION TO ADOPT DR. PAGLINI'S**
19 **RECOMMENDATIONS; FOR AN ORDER TO SHOW CAUSE WHY**
20 **PLAINTIFF SHOULD NOT BE HELD IN CONTEMPT OF COURT;**
21 **TO MODIFY CUSTODY; AND FOR ATTORNEY'S FEES AND COSTS**
22 **AND**
23 **PLAINTIFF'S COUNTERMOTION FOR A PROTECTIVE ORDER ON**
24 **BEHALF OF THE PARTIES' MINOR CHILDREN; FOR AN ORDER**
25 **SEALING CASE FILE; FOR AN ORDER REQUIRING DEFENDANT TO**
26 **OBTAIN COURT APPROVAL PRIOR TO FILING FUTURE MOTIONS;**
27 **TO DECLARE DEFENDANT A VEXATIOUS LITIGANT;**
28 **FOR SANCTIONS, FEES, AND COSTS; AND FOR RELATED RELIEF**

29 **COMES NOW**, Plaintiff DEVIN REED, appearing in proper person, and
30 hereby files this *Opposition to Defendant's Motion to Adopt Dr. Paglini's*
31 *Recommendations; for an Order to Show Cause Why Plaintiff Should Not be Held*
32 *in Contempt of Court; to Modify Custody; and for Attorney's Fees and Costs; and*

1 *Countermotion for a Protective Order on Behalf of the Parties' Minor Children;*
2 *for an Order Sealing the Parties' Case File; for an Order Requiring Defendant to*
3 *Obtain Court Approval Prior to Filing Future Motions; to Declare Defendant a*
4 *Vexatious Litigant; for Sanctions, Fees, and Costs; and for Other Related Relief.*

5
6 This *Opposition/Countermotion* is based upon the attached Memorandum of
7 Points and Authorities, any supporting exhibits provided in *Defendant's Exhibit*
8 *Appendix* filed contemporaneously with this *Opposition/Countermotion*, the attached
9 *Declaration of Devin Reed*, any/all pleadings and papers on file herein, and any
10 further evidence or argument presented to the Court at the hearing of this matter.
11

12 As set forth herein, Devin respectfully requests that the Court:

- 13 1. Enter an Order denying Defendant's Motion in its entirety;
- 14 2. Enter a Protective Order on behalf of the parties' minor children,
- 15 Abigail and Shawn, against Defendant's boyfriend, Jeffrey Eatherly;
- 16 3. Enter an Order sealing the parties' case file;
- 17 4. Declare Defendant a vexatious litigant and enter an Order requiring
- 18 Defendant to obtain Court approval prior to filing any future Motions;
- 19 5. Sanction Defendant and her counsel pursuant to EDCR 7.60(b);
- 20 6. Award Devin his full attorney's fees should he need to retain counsel;
- 21 7. Award Devin any other relief this Court deems just and appropriate.
- 22
- 23

24 **DATED** Monday April 20, 2020.

25 Respectfully Submitted,

26 */s/ Devin Reed*

27 **Devin Reed**
28 *Plaintiff in Proper Person*

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PLEASE TAKE NOTICE that a hearing on *Plaintiff's Opposition to Defendant's Motion to Adopt Dr. Paglini's Recommendations; for an Order to Show Cause Why Plaintiff Should Not be Held in Contempt of Court; to Modify Custody; and for Attorney's Fees and Costs; and Countermotion for a Protective Order on Behalf of the Parties' Minor Children; for an Order Sealing the Parties' Case File; for an Order Requiring Defendant to Obtain Court Approval Prior to Filing Future Motions; to Declare Defendant a Vexatious Litigant; for Sanctions, Fees, and Costs; and for Other Related Relief* will be held before the Eighth Judicial District Court, Family Court Division, Department F, located at 601 North Pecos Road, Las Vegas, Nevada, on ***May 13, 2020 at 9:00 a.m.***

Respectfully Submitted,

Devin Reed
9425 West La Madre Way
Las Vegas, Nevada 89149
Telephone: (702) 890-1190
Email: devinreed2003@gmail.com
Plaintiff in Proper Person

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**
3 **INTRODUCTION**

4 The parties to this post-Decree divorce action are Plaintiff DEVIN REED
5 (“Devin”) and Defendant AMANDA REED (“Amanda”). Devin and Amanda have
6 two children from their marriage, to-wit: ABIGAIL REED (“Abby”), born April 6,
7 2013, presently age 7; and SHAWN REED (“Shawn”), born July 3, 2015, age 4.
8

9 The parties’ *Decree of Divorce* was **just** entered on April 6, 2020 (Amanda’s
10 Motion was hurriedly filed two days later without any EDCR 5.501 compliance)
11 wherein Devin and Amanda were awarded JOINT LEGAL and JOINT PHYSICAL
12 custody of both Abby and Shawn. Notably, this has been the parties’ **stipulated**
13 custodial arrangement since October 16, 2018.
14

15 Over the past two-plus-years, a few things have become glaringly apparent:
16
17 (1) Amanda is a vexatious litigant (obsessed with keeping the parties’ seemingly
18 endless litigation going at all costs);¹ (2) Amanda is showing concerning signs of
19

20 ¹ Amanda filed a *Motion to Enforce; for an Order to Show Cause; for Clarification; and for Attorney’s*
21 *Fees and Costs* on December 12, 2018; which was DENIED by the Court on January 22, 2019;

22 In response to Devin seeking a Protective Order against Amanda’s abusive father, Amanda filed a
23 *Countermotion for Primary Physical Custody; Child Custody Evaluation; Child Support; Excusive*
24 *Possession; and for Attorney’s Fees on Costs* on March 8, 2019; which was DENIED on April 8, 2019;

25 Amanda then filed a *Notice of Appeal* on June 21, 2019; which was later WITHDRAWN by stipulation;

26 Amanda then filed a *Motion for an Order to Show Cause; for Leave to Amend Counterclaim; for a*
27 *Modification of Custody; to Continue Trial; and for Attorney’s Fees and Costs* on July 25, 2019; which
28 was resolved by STIPULATION on September 19, 2019;

29 Amanda then filed a *Motion to Compel* on August 12, 2019; which was VACATED by stipulation); and

30 Amanda then filed her pending *Motion to Adopt Dr. Paglini’s Recommendations; for an Order to Show*
31 *Cause; to Modify Custody; and for Attorney’s Fees and Costs* on April 8, 2020.

1 pathogenic parenting (particularly with regard to the parties' daughter, Abby);² and
2 (3) Amanda simply wishes to rehash alleged incidents and events that took place
3 *several years prior* to the parties' stipulated custodial arrangement (all of which are
4 barred under *McMonigle*).³

6 In that regard, if Devin is really the "monster" that Amanda wants the Court
7 to believe he is, and if Amanda was so concerned about Abby and Shawn spending
8 so much time with that monster, then why in the world would she stipulate to the
9 parties' sharing joint legal and joint physical custody in 2018? The answer, of
10 course, is she wouldn't. Clearly, Amanda has found a disingenuous opportunity to
11 take another bite at the "custodial apple" based on a one-sided report submitted by
12 John Paglini, Ph.D. in late-January (a report that was prepared without Dr. Paglini
13 having all of the pertinent information in this case; more on that in a moment).

16 Amanda then pads her pleading with alleged acts of contempt (that Devin is
17 happy to refute in his Declaration attached hereto); supplements her pleading with
18

20 ² Mental health professionals that this Court routinely hears from – including Dr. Stephanie Holland,
21 Nicholas Ponzo, and Donna Wilburn – refer to pathogenic parenting (also known as attachment-
22 based parental alienation) as a *pervasive pattern* of alienating and undermining behaviors designed to
23 impair (and eventually ruin) the other parent's relationship with his/her children.

24 Amanda undermines Devin's relationship with Abby and Shawn at every turn; and frequently interferes
25 with Devin's custodial time by telling the kids things like "don't worry, you'll be back with mommy
26 soon," "mommy will keep you safe," and "you don't have to go with daddy if you don't want to."

27 Amanda even admits in her Motion that she "has to brush and fix Abby's hair every day at school,
28 even on Devin's custodial days" because Devin is so inept as a parent (see *Motion* at 13:4).

26 ³ *McMonigle v. McMonigle*, 110 Nev. 1407, 887 P.2d 742 (1994):

27 The Nevada Supreme Court held that "the moving party in a custody proceeding must show that
28 circumstances have substantially changed since the most recent custodial order" and that events that
took place before that proceeding [are] inadmissible to establish a change of circumstances," citing to
Stevens v. Stevens, 107 Ore. App. 137, 810 P.2d 1334, 1336 (Or. Ct. App. 1991). *Id.* at 1408.

hand-picked text messages (that based on obvious editing and deliberate omissions are not authentic and should be stricken from this Court's record); asks the Court for an absurd sanctions award of \$12,000.00; and demands to modify custody (for the third time in 2-years) just 2-days after the entry of the parties' *Decree of Divorce*.

Most inexcusable, however, is the fact that Amanda and her counsel have made a conscious decision to mislead this Court by neglecting to mention the fact that Amanda's live-in boyfriend of more than 2-years, Mr. Jeffrey Eatherly, was arrested on February 23, 2020 for ***molesting and sexually abusing Abby***. Eatherly is currently being held at the Clark County Detention Center where he is facing charges of (1) lewdness with a child under the age of fourteen; (2) sexual assault against a child under the age of fourteen; and (3) attempting to use a minor, under the age of fourteen, in the production of pornography:

02752242	EATHERLY, JEFFREY S	39	Unknown	Male
20FN0436X	LEWDNESS W/CHILD < 14, (1ST)			Active
	2/23/2020	N	\$200,000.00	\$200,000.00
Call (702) 671-5700	01	PRELIMINARY HEARING	4/23/2020	8:30 AM

02752242	EATHERLY, JEFFREY S	39	Unknown	Male
20FN0436X	SEX ASSAULT AGAINST CHILD < 14			Active
	2/23/2020	N	\$0.00	\$0.00
Call (702) 671-5700	01	PRELIMINARY HEARING	4/23/2020	8:30 AM

02752242	EATHERLY, JEFFREY S	39	Unknown	Male
20FN0436X	ATT USE MINOR, LESS THAN 14, TO PROD PORN			Active
	2/23/2020	N	\$0.00	\$0.00
Call (702) 671-5700	01	PRELIMINARY HEARING	4/23/2020	8:30 AM

For perspective, Amanda and her counsel are telling this Court that Devin is creating "chaos" in Abby's life; that Devin "is the reason" Abby needs ongoing therapy; that Abby "sobs hysterically" because she doesn't want to be with her