

Electronically Filed
Jan 10 2022 11:15 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

EXHIBIT “C”

EXHIBIT “C”

EXHIBIT “C”



View Message

From: Devin Reed

To: Amanda Reed

Details

Re: Abby's anxiety/behavior

Feb 27, 2020 at 09:53 AM

No to chuck e cheese . Do not put that into her head. They need to get used to safe-key . I spoke to safe key supervisor as you did so she knows what to expect please work w abby to accept it . I want no interaction between you or your father you need to be gone when i get them next time i will wait until 6 pm if i have to for you to be gone so quicker you leave the quicker they get pu. I will not ever be around your dad. Leave them at safe key friday. All of what you say is lies and made up crap . I never said she couldn't go to Disney. Why would i say that? Custody is final everything is over read the decree your lawyer drafted . Its done . I will never give up time w them . You absolutely make it worse w your video recording and all the negative vibes at exchanging. No . She loves madison . You are too much . Stop it . Divorce is final custody is final everything is final . Just stop and get along . I will never be cool w your dad he is the ultimate weirdo so keep him in the exchanges acting like a stupid



EXHIBIT “D”

EXHIBIT “D”

EXHIBIT “D”



View Message

From: Devin Reed

To: Amanda Reed

Details

Re: Abby Dr. Shaffer day/time change

Feb 18, 2020 at 12:25 PM

Again i will ask . Why is she going ? how long is she going for ? What is the goal for her to be there? You can take her on your time unless there is a good answer for these simple questions.

From: Amanda Reed

02/18/2020 at 08:18 AM

To: Devin Reed

Subject: Abby Dr. Shaffer day/time change

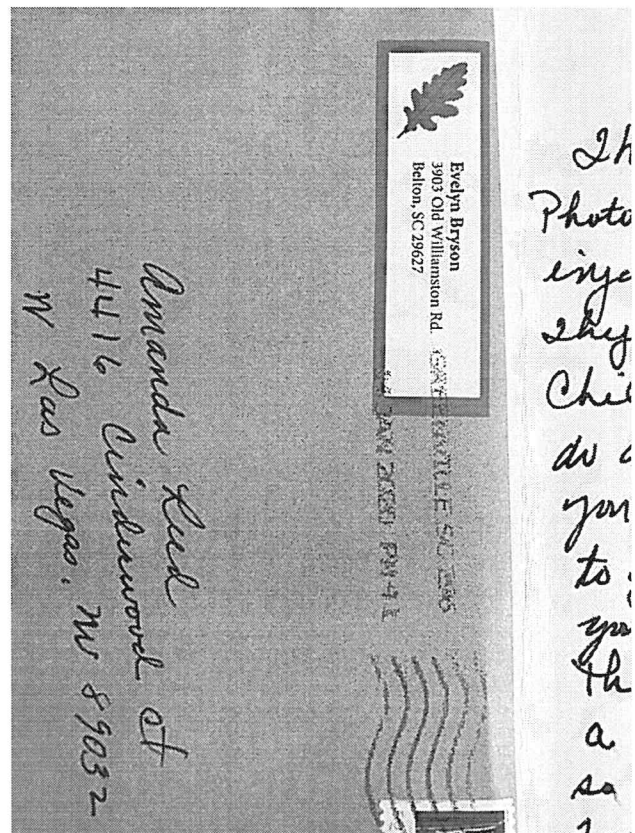
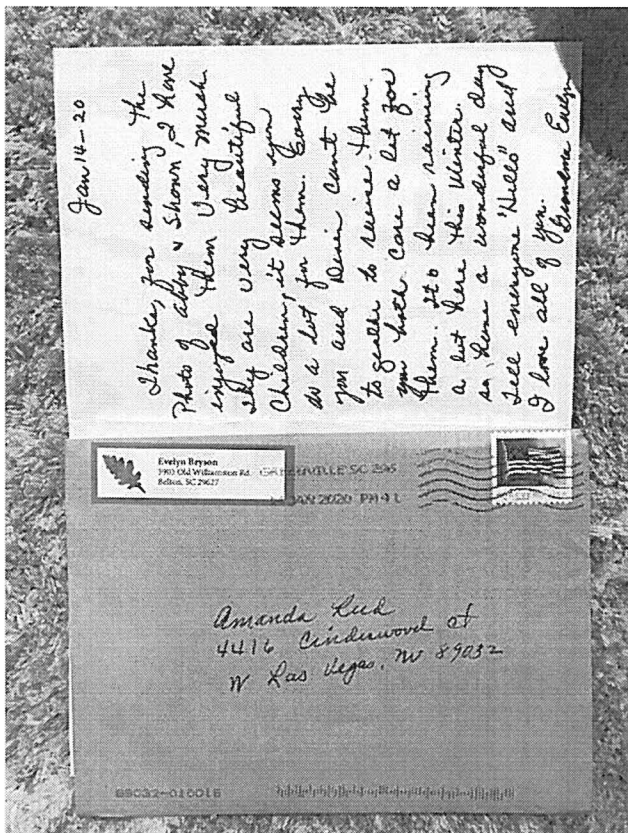
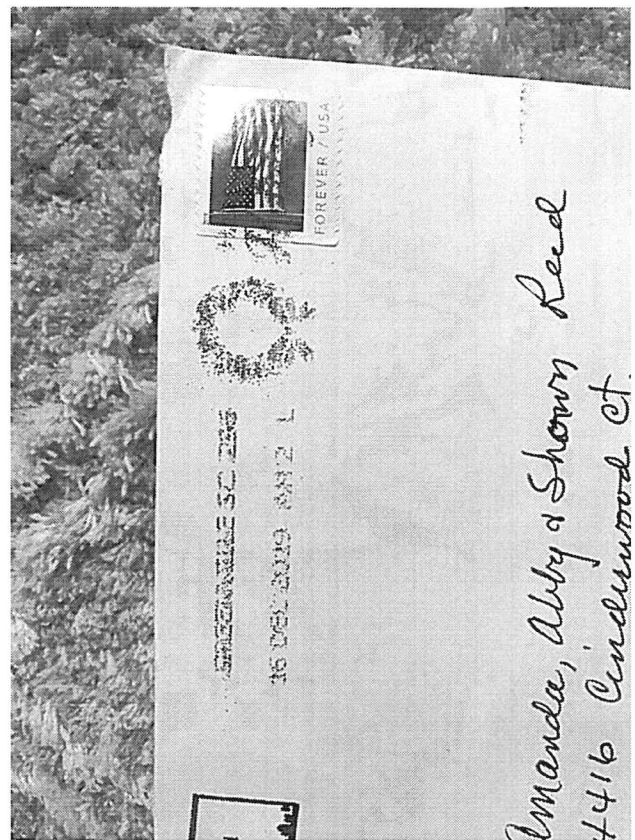
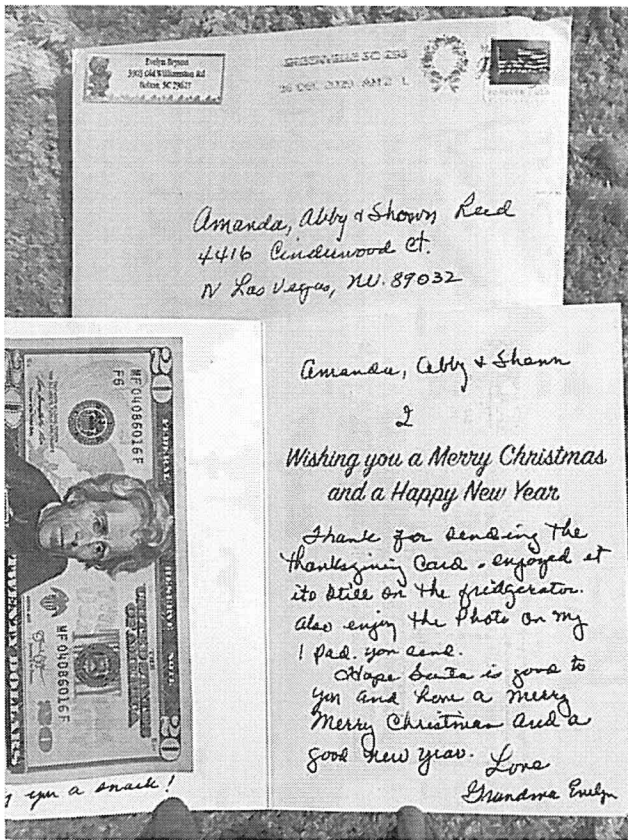
We are switching Abby to Wednesdays. When Dr. Shaffer has this time slot free I will let you know as you will be bringing her every other week.

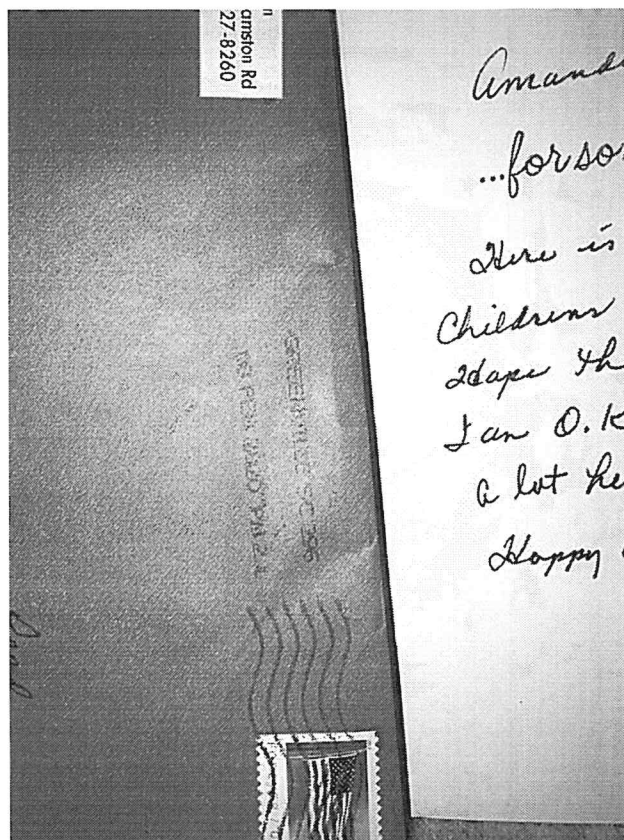
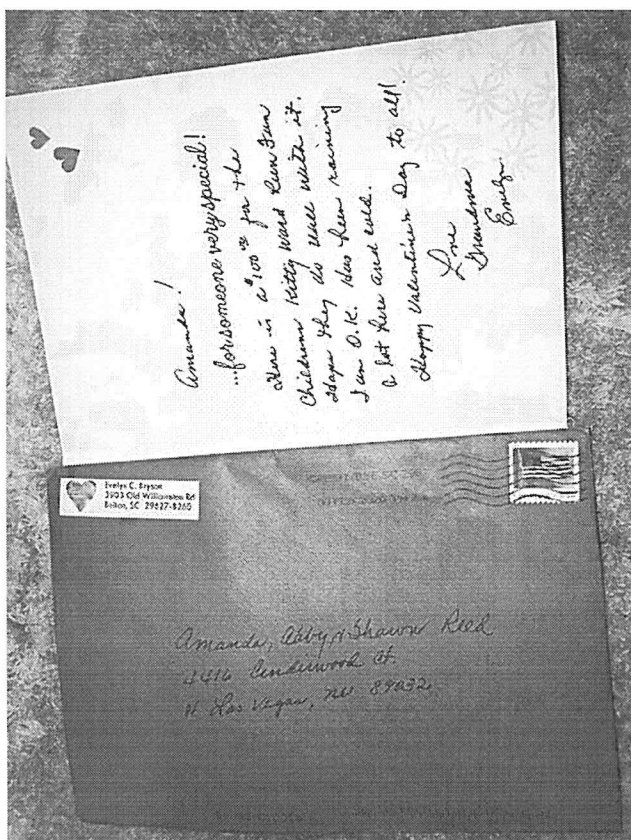


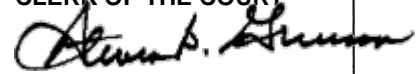
EXHIBIT “E”

EXHIBIT “E”

EXHIBIT “E”







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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
CLARK COUNTY, NEVADA

DEVIN REED,

Plaintiff,

v.

AMANDA REED,

Defendant.

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

**REPLY TO PLAINTIFF'S
OPPOSITION TO 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 OPPOSITION TO
PLAINTIFF'S COUNTERMOTION
FOR PROTECTIVE ORDER OON
BEHALF OF THE PARTIES'
MINOR CHILDEN; FOR AN
ORDER SEALING 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 RELATED RELIEF**

Hearing Date: May 13, 2020
Hearing Time: 9:00 a.m.

\\

COMES NOW Defendant, Amanda Reed, by and through her attorney, Carrie J. Primas, Esq., of Hanratty Law Group, and hereby respectfully submits her Reply to Opposition to 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 Opposition to Countermotion for a Protective Order on Behalf of the Parties' Children; for an Order Sealing the Parties' Case File; for an Order Requiring Defendant Obtain Court Approval Prior to Filing Future Motions; to Declare Defendant a Vexatious Litigant; for Sanctions, Fees, Costs; and for Other Related Relief.

This Reply to Opposition and Opposition to Countermotion is made and based on all the papers and pleadings on file herein, the attached Memorandum of Points and Authorities, the attached exhibits and any further evidence and argument as may be adduced at the hearing on this matter.

Dated this 7th day of May, 2020.

HANRATTY LAW GROUP

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

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**
3 **Reply/Opposition**

4 **I. Facts**

5 In his Opposition, Devin makes several statements that are simply untrue and
6
7 unsupported by evidence, which Amanda will reply to in turn:

- 8 1. Devin alleges that Amanda did not comply with EDCR 5.501. As
9 outlined in Amanda's Motion, undersigned counsel sent a letter to
10 Devin's then-counsel a letter addressing all issues in Amanda's
11 Motion on February 25, 2020 A copy of said letter is attached
12 hereto as ***Exhibit "A"***, and is being introduced only to show that it
13 was sent in compliance with EDCR 5.501. It is not being
14 introduced for the purpose of the Court reviewing its contents.
15
16
17 2. In support of his allegations that Amanda is a vexatious litigant, he
18 alleges that Amanda filed a request for primary physical custody
19 and child custody evaluation in retaliation to him seeking a
20 Protective Order against her father. However, the Protective Order
21 was requested (and denied) in September, 2018, and Amanda's
22 request for primary physical custody and child custody evaluation
23 was not filed until March 8, 2019, six (6) months later.
24
25

26 \\

1 3. Devin alleges that Amanda is “showing concerning signs of
2 pathogenic parenting,” yet the parties just underwent a full
3 Custodial Evaluation with Dr. Paglini, whose report specifically
4 states, regarding Amanda, “No evidence of antisocial personality
5 traits or sociopathy;” and that “it is very understandable that Ms.
6 Reed videotapes her interactions with Mr. Reed. It is also very
7 understandable that her father will be protective of his daughter
8 once informed of the history of domestic violence.” *See Custody*
9 *Evaluation at pg. 47.*

10 4. Devin alleges that Abby’s emotional distress and need for therapy
11 “has **nothing** to do with Devin,” (*See Plaintiff’s Opposition, Page*
12 *7, lines 3-5*), yet Dr. Paglini’s Report makes it clear that Abby
13 requires ongoing therapy “as Abigail has witnessed domestic
14 violence between her parents and has been emotionally affected.”

15 In his Opposition, Devin addresses Abby being molested and sexually abused
16 by a man named Jeffrey Eatherly, who Devin alleges was Amanda’s live-in
17 boyfriend. Mr. Eatherly is a man who Amanda dated for a few months in 2018,
18 who both parties were familiar with. Amanda and Mr. Eatherly had remained
19 friendly, as he occasionally helped her fix things around the house. Mr. Eatherly
20 never lived with Amanda and he was never left alone with the minor children. On
21 February 23, 2020, without Amanda’s knowledge, Mr. Eatherly entered Amanda’s

1 home through the garage at approximately 4:30 in the morning, went into Abby's
2 room, and touched her inappropriately.

3
4 Abby reported the incident to Amanda the same day it happened, and
5 Amanda immediately called CPS and the police to report it to them. An
6 investigation was started, and Mr. Eatherly was arrested and charged with several
7 different charges the same day. The CPS investigation was ultimately closed as to
8 Amanda, as it was determined that she had not failed to protect Abby, but rather
9 that Jeff had wrongfully entered her home without her knowledge. Further, it was
10 Amanda, not Devin, who notified Abby's therapist, Lisa Shaffer; Amanda notified
11 Devin of the incident through Our Family Wizard. Amanda has been present at
12 every one of Mr. Eatherly's court appearances; Devin has not been in attendance
13 one time.

14
15 Devin alleges that he is "extremely concerned about Amanda's capacity to
16 protect her children," yet in an Our Family Wizard message sent to Amanda on
17 February 23, 2020, in response to the incident, Devin stated, "I know you are a
18 great mom and are super protective and you would not have ever seen this
19 happening...I don't blame you¹."

20 21 22 23 **II. Dr. Paglini's Recommendations**

24 Pursuant to EDCR 2.20(d), failure to file a written opposition to a motion
25 may be construed as an admission that the motion is meritorious and should be
26

27 ¹ A copy of the communication is attached as **Exhibit "B"** in the Exhibits in Support of
28 Defendant's Motion and is hereby fully incorporated herein by reference.

1 granted. In her Motion, Amanda requested that Dr. Paglini's recommendations be
2 adopted. In his Opposition, which clearly outlines his position on all other relief
3 requested in Amanda's Motion, Devin does not oppose Amanda's request regarding
4 Dr. Paglini's recommendations. As such, this request should be deemed unopposed
5 and should be granted pursuant to EDCR 2.20(e).
6

7 **III. EDCR 5.501**

8
9 As noted above, Amanda complied with EDCR 5.501 by sending a letter to
10 Devin's then-counsel, Louis Schneider, Esq., addressing all of the issues outlined in
11 Amanda's Motion. If Devin did not receive the letter from Mr. Schneider, that is an
12 issue he must address with Mr. Schneider. It is only incumbent on the moving party
13 to attempt settlement; the moving party is not required to make sure the other
14 party's counsel is forwarding the communication. Further, on February 27, 2020,
15 Devin sent Amanda a message in Our Family Wizard stating, "I will never give up
16 time w them," indicating that Devin did receive Amanda's letter regarding
17 settlement².
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21 Devin argues that Amanda did not comply as she did not send another letter
22 to him once his counsel withdrew. However, EDCR 5.501 does not require a new
23 attempt at settlement every single time a party changes attorneys or goes from being
24 represented to unrepresented. If this were required, the moving party would never
25 be able to file a Motion, as the other party could simply get a new counsel every
26

27 ² A copy of the communication is attached as **Exhibit "C"** in the Exhibits in Support of
28 Defendant's Motion and is hereby fully incorporated herein by reference.

1 time a settlement letter is sent. Undersigned counsel sent an EDCR 5.501 letter on
2 February 25, 2020, then had numerous communications with Mr. Schneider over
3 the following weeks, including via email and telephone call. Once it was clear that
4 it would not be possible to resolve the issues without filing a Motion, undersigned
5 counsel began preparing same and filed it once complete. It is only a coincidence
6 that it was filed two (2) days following the filing of the Decree of Divorce; the
7 Decree had been submitted to the Court for signature on March 26, 2020, more than
8 a week earlier.
9

10 **IV. Custody**

11 Devin argues that Amanda has not shown a prima facie case for
12 modification, required for the Court to set an Evidentiary Hearing on custody. As
13 noted in Devin's Opposition, a prima facie case is shown where (1) the facts alleged
14 are relevant to the grounds for modification and (2) the evidence is not merely
15 cumulative or impeaching. Incidents of domestic violence by Devin against
16 Amanda, especially in the presence of the minor children, combined with the
17 contents of Dr. Paglini's report, are certainly grounds for modification. This
18 evidence has not been presented to this Court before, and gives rise to the
19 presumption against joint custody under NRS 125C.0035(5), and thus is adequate
20 cause for an evidentiary hearing.
21

22 Devin argues that Amanda's Motion is an attempt to get a second bite at the
23 apple by "rehashing things that took place prior to the parties' previous custodial
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1 Order,” which he argues are irrelevant and prohibited under *McMonigal*. Devin
2 further argues that Amanda’s use of *Castle v. Simmons* fails because her allegations
3 of domestic violence have been argued from the beginning of the case and are not
4 “new” to the Court, and because the custody order in question was a Stipulation and
5 Order and thus the reputable presumption regarding domestic violence outlined in
6 NRS 125V.0035(5) was overcome when Amanda stipulated to joint physical
7 custody.
8

9
10 Devin’s statements that the Court has already considered the domestic
11 violence in question is simply false. As this Court is aware, no evidence of any
12 kind has ever been taken regarding custody, and no details of the domestic violence
13 incidents have ever been presented to this Court, other than in Dr. Paglini’s report.
14 The parties first appeared in front of this Court on August 14, 2018, and placed the
15 stipulated custody agreement on the record at that time. While Amanda’s initial
16 Motion, filed on April 10, 2018, briefly referenced domestic violence, it did not
17 outline the specifics of the incidents or the extent of the abuse.
18

19
20 Further, in *Baumann*, the Nevada Supreme Court stated that allegations of
21 abusive conduct that occurred prior to the last custody order are admissible when
22 the court was unaware of the allegations before the parties entered their stipulated
23 agreement. Emphasis added. *Baumann v. Baumann*, 125 Nev. 1451, 238 P.3d 795
24 (2008). Thus, in combining the holdings of *Castle* and *Baumann*, the principles of
25 res judicata do not apply when (1) a party seeks to introduce evidence of abusive
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1 conduct that occurred prior to the most recent custody order; (2) the most recent
2 custody order was a stipulated order; and (3) the court was unaware of the abuse, **or**
3 **the extent of the abuse**, prior to the entry of that custody order. This was
4 confirmed more recently in *Nance v. Ferraro*, 418 P.3d 679 (Nev. App. 2018). As
5 such, the Court is not barred by *McMonigal* from hearing evidence of the prior
6 domestic violence.
7

8
9 It is clear that Devin is not concerned with the best interest of the children,
10 but is only concerned with hiding his domestic violence from the Court. In fact, he
11 is likely in denial about it altogether. As indicated in Dr. Paglini's report, Devin
12 refused to admit the existence of domestic violence, even when confronted with
13 recordings of same. Devin even refused to listen to these recordings, insisting that
14 Dr. Paglini turn them off. Devin also insists that Abby's continued therapy has
15 nothing to do with him, despite Abby's therapist and Dr. Paglini specifically stating
16 that it is necessary due to her exposure to domestic violence. Devin has never
17 participated in Abby's therapy; he has only ever attended a session when he
18 withdrew her in violation of this Court's Order. As recently as February 18, 2020,
19 Devin sent Amanda a message on Our Family Wizard asking, "Why is she going?
20 How long is she going for? What is the goal for her to be there? You can take her
21 on your own time unless there is a good answer for these simple questions³." Devin
22 either did not read Dr. Paglini's report, or is simply ignoring its contents. Either
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27 ³ A copy of the communication is attached as **Exhibit "D"** in the Exhibits in Support of
28 Defendant's Motion and is hereby fully incorporated herein by reference.

1 way, it is clear that to determine the best interest of the minor children, the Court
2 must hold a full Evidentiary Hearing, taking into consideration the full contents of
3 Dr. Paglini's report as well as the history of domestic violence.
4

5 **V. Contempt**

6 Devin alleges that Amanda did not submit an *Awad* affidavit with her
7 Motion. Amanda did submit a detailed Declaration, and can only assume that
8 Devin's argument is that she submitted a *declaration* instead of an *affidavit*. A
9 declaration, sworn under penalty of perjury, is widely accepted in lieu of an
10 affidavit. Amanda's Declaration does specifically outline Devin's violations of the
11 Mutual Behavior Order and other orders of the Court. Devin also alleges that
12 Amanda "doesn't address the need for a contempt ruling," but this is also false, as
13 Amanda's Motion clearly states that a contempt ruling is necessary "to show Devin
14 that the Court's Orders must be obeyed and he cannot simply do whatever he
15 pleases." The purpose of the contempt ruling, and accompanying sanctions, is to
16 get Devin to comply with this Court's orders, which he has refused to do since the
17 onset of this case.
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22 Devin's own Declaration makes it clear that he is in fact in contempt of this
23 Court's orders, as he explains, rather than denying, several of the violations:
24

- 25 1. Devin explains his abusive comments in Amanda's Exhibit C by alleging that
26 Amanda was sending emails to his current girlfriend, and harassing his
27 grandmother. He does not deny sending the text message in violation of
28

1 August 14, 2018, or making the abusive comments in violation of the Mutual
2 Behavior Order.

3
4 2. Devin explains away his abusive and disparaging comments in Amanda's
5 Exhibit E by stating that she and her father were "circling" him. Amanda
6 does not even know what this means, but the fact is that Devin's message
7 was in direct violation of the Mutual Behavior Order.

8
9 3. Devin alleges that Amanda calls and harasses his grandmother as an excuse
10 for his abusive language in Amanda's Exhibit F. This is simply not true.
11 Amanda remains close with Devin's grandmother. Devin's grandmother
12 continues to send cards and money to Amanda, copies of which are attached
13 hereto⁴. Devin's grandmother clearly does not feel harassed by Amanda.
14 Further, Devin again outright lies about orders of this Court, alleging that
15 "there is even an order...about her harassment." No such order exists.

16
17
18 4. Devin explains what gave rise to the messages in Amanda's Exhibits G, J,
19 and L, but does not deny the abusive language.

20
21 5. Regarding the abusive language in Amanda's Exhibits K and M, Devin
22 alleges that Amanda was present at the school and hiding Abby in her
23 classroom, and that he "got the office manager to open Amanda's class to
24 find Amanda and her father sitting there." This is simply not true – Amanda
25 was not present at the school, and numerous school employees will confirm
26

27
28 ⁴ A copy of the cards are attached as **Exhibit "E"** in the Exhibits in Support of Defendant's Motion and is hereby fully incorporated herein by reference.

1 that it was another teacher who located Abby, alone and crying in the
2 hallway. Not only is Devin being dishonest with the Court, he again does not
3 deny the abusive language in his message to Amanda.
4

5 6. Regarding Amanda's Exhibit N, Devin again alleges she is harassing his
6 grandmother, but as noted above, Amanda remains close with Devin's
7 grandmother. Again, Devin does not deny the abusive language in the
8 message.
9

10 7. Regarding Amanda's Exhibit P, Devin alleges that he has a restraining order
11 against Amanda's dad for pulling a gun on him and stalking him, but this is a
12 flat out lie. While Devin applied for a restraining order almost two (2) years
13 ago, the same was denied because Devin was dishonest with the police; while
14 Amanda's dad did have a gun in his vehicle, it was not the gun Devin alleged
15 he pulled out. If Amanda's dad were truly harassing Devin as Devin claims,
16 Devin would have been successful in having a restraining order granted by
17 now.
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21 **VI. Order of Protection on Behalf of Minor Children**

22 Amanda does not believe this Court has jurisdiction to enter orders regarding
23 Mr. Eatherly, but is not opposed to any order that may be issued by any court for
24 Mr. Eatherly to stay away from the minor children.
25

26 ///

27 ///

VII. Order Sealing Case File

While Amanda is not necessarily opposed to the parties' case file being sealed, she is opposed to the courtroom being closed for future proceedings, which will occur as a result of a case being sealed. As the Court is aware, there is a long history of abuse and control of Amanda by Devin, and Amanda's father is always present for interactions between the parties to act as Amanda's support. Sealing the case, and the resulting closing of the courtroom, will result in Amanda not having her support person present during hearings where the other person has committed extensive domestic violence as acknowledged and outlined in Dr. Paglini's report. There is no reason to seal the parties' file; they are not important public figures and there is no sensitive information contained in the filed documents. It is clear that Devin's request to seal the file is an attempt to further control and alienate Amanda away from her support system.

While the Court could technically seal the file but note that the courtroom would remain open, this gives rise to the possibility of said note being lost during the course of future case reassignments, which are likely to happen as the parties' children are still very young. Given that there is no reason to seal the case and that doing so would result in prejudice to Amanda in not allowing her support persons to be present, Amanda respectfully requests that Devin's request to seal the file be denied. In the alternative, Amanda requests that the order sealing the parties' file specifically state that the courtroom will remain open to immediate family members

1 of the parties.

2 **VIII. Vexatious Litigant**

3 Devin requests that Amanda be deemed a vexatious litigant because she
4 continues to file “baseless motion after motion.” First, a review of the record will
5 show that each of the motions Amanda has previously filed in this Court have been
6 granted in part or resolved by stipulation. Second, the instant motion was literally
7 invited by the Court. At the hearing held on January 29, 2020, most of which took
8 place off the record with counsel only, the Court advised Ms. Primas that she would
9 need to file a Motion requesting that Dr. Paglini’s recommendations be adopted.
10 Further, the Court noted that it would be reviewing the file and setting up a
11 chambers meeting with the judge and counsel to determine whether there was a
12 basis to set an Evidentiary Hearing, or whether a Motion would need to be filed.
13 The Court also advised Ms. Primas that a new motion would need to be filed to
14 address additional instances of contempt.

15 The Court never set a chambers meeting to review the file with counsel and
16 determine whether an Evidentiary Hearing could be set on the papers already filed,
17 so it became necessary for Amanda to file a Motion requesting the same. Further,
18 the only way to get Dr. Paglini’s recommendations adopted was to file a Motion;
19 doing so is clearly not vexatious, as the Court told Ms. Primas to do so, and,
20 further, the recommendations are those of a mutually agreed upon expert.

21 \\\

1 **IX. Sanctions and Attorney Fees**

2 Devin's request for attorney's fees is based on his allegations that Amanda
3 did not comply with EDCR 5.501. As noted above, Amanda *did* comply with
4 EDCR 5.501, by sending a letter to Devin's counsel and subsequently discussing
5 settlement with him via email and telephone. Devin's own Our Family Wizard
6 message, indicating that he will "never give up time," belies his allegation that he
7 never received that letter.
8
9

10 Devin also requests sanctions due to Amanda "unnecessarily multiplying
11 these proceedings." As noted above, Amanda had no choice but to file the
12 underlying Motion to request that Dr. Paglini's recommendations get adopted, and
13 for the Court to consider her request to modify custody. There is no basis for an
14 award to attorney's fees to Devin.
15

16 **X. Child Support**

17 Devin alleges that he was furloughed in March and is not receiving
18 unemployment, but provides no proof that he is not receiving unemployment
19 benefits. According to the letter attached to his Financial Disclosure Form, he was
20 laid off on March 17, 2020, seven (7) weeks ago. There is no reason Devin should
21 not be receiving unemployment, unless he chose not to apply immediately. Further,
22 the Court should note that during the parties' divorce litigation, Devin was
23 unemployed but managed to make the \$750.00 monthly payment on his vehicle,
24 indicating he was, and likely still is, receiving income from other sources. The
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1 court should not modify child support until Devin has provided further information
2 related to his application for unemployment and proof of his actual income.

3 **XI. Honk & Seat Belt**

4
5 There are no orders in this case that require the Honk and Seatbelt Rule. If
6 such an order exists, both parties are in violation, as numerous video recordings of
7 exchanges show both parties out of their vehicles. Further, the parties conduct
8 exchanges in public parking lots, and thus the Rule cannot technically be utilized.
9
10 In any event, if Devin prefers a modified Honk and Seatbelt Rule, Amanda will
11 agree to the same, but it must be noted that Abby refuses to go with Devin for his
12 custodial time, even if Amanda physically forces her and Devin physically carries
13 her to his car. As such, if Devin insists on the Honk and Seatbelt Rule, he cannot
14 hold against Amanda any instance of Abby not getting out of Amanda's car.
15

16 **XII. Stay Away Order**

17
18 This Court has no jurisdiction over Amanda's father. As noted above and
19 repeatedly throughout the parties' divorce litigation, Amanda's father is present at
20 all exchanges due to the historic abuse of Amanda by Devin. Amanda's father does
21 not interfere with the exchanges in any way. It is important to note that the
22 Protective Order that Devin alleges having issued against Amanda's father was
23 actually denied because Devin lied to the police; he alleged that Amanda's father
24 threatened him with a gun from his car, but a police search of the vehicle confirmed
25 that the gun described by Devin did not exist. It is even more important to note that
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1 Devin has already requested a Stay Away Order regarding Amanda's father, and
2 said request was denied on March 20, 2019, because the Court has no jurisdiction
3 over third parties. If anybody should be deemed a vexatious litigant, it is Devin,
4 who continues to request the same relief that has already been denied.
5

6 II.

7 Conclusion

8
9 Therefore, based upon the foregoing, Amanda requests the Court to enter an
10 Order:

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

19 Dated this 7th day of May, 2020.

20 HANRATTY LAW GROUP

21
22 By: Carrie Primas
23 Carrie J. Primas, Esq.
24 Nevada Bar No. 12071
25 1815 Village Center Circle, Suite 140
26 Las Vegas, Nevada 89134
27 Phone: (702) 821-1379
28 Fax: (702) 870-1846
Email: attorneys@hanrattylawgroup.com
Attorney for Defendant, Amanda Reed

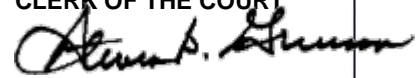
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Hanratty Law Group, and on the
7th day of May, 2020, I placed a true and correct copy of the *Reply to*
Opposition and Opposition to Countermotion 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: Kari Collis
Employee of Hanratty Law Group



1 NOTC

2 HANRATTY LAW GROUP

3 Carrie J. Primas, Esq.

4 State Bar of Nevada No. 12071

1815 Village Center Circle, Suite 140

4 Las Vegas, Nevada 89134

PH: (702) 821-1379

5 FAX: (702) 870-1846

EMAIL: attorneys@hanrattylawgroup.com

6 Attorneys for Defendant, Amanda Reed

7
8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 DEVIN REED,

11 Plaintiff,

12 v.

13 AMANDA REED,

14 Defendant.

) Case No: D-18-568055-D

) Dept No: F

) **NOTICE OF INTENT TO APPEAR BY**
) **COMMUNICATION EQUIPMENT**

) Date of Hearing: May 13, 2020

) Time of Hearing: 9:30 a.m.

15 COMES NOW Defendant, Amanda Reed, by and through her attorney of record, Carrie J.
16 Primas, Esq., of Hanratty Law Group, pursuant to the Order Adopting Part IX of the Supreme
17 Court Rules filed December 18, 2008, and hereby submits a Notice of Intent to Appear by
18 Communication Equipment for the hearing currently scheduled for May 13, 2020, at 9:30 a.m.,
19 Pacific Time.
20

21 For the purposes of this appearance, Defendant, Amada Reed, can be reached at the
22 following telephone number: (702) 235-7444, and Attorney Primas can be reached at the
23 following telephone number: (702) 982-3761. Defendant and Counsel understand that it is their
24 responsibility to ensure that they can be reached at the foregoing telephone numbers on the date
25 and time of the hearing.

26 \\\

1 Plaintiff and Counsel also understand that due to the unpredictable nature of court
2 proceedings, the hearing may be called at a time other than the scheduled time.

3 DATED this 8th day of May, 2020.

4 Respectfully submitted by:

5 **HANRATTY LAW GROUP**

6
7 By: Carrie Primas
8 Carrie J. Primas, Esq.
9 Nevada Bar No. 12071
10 1815 Village Center Circle, Ste. 140
11 Las Vegas, Nevada 89134
12 PH: (702) 821-1379
13 FAX: (702) 870-1846
14 EMAIL: attorneys@hanrattylawgroup.com
15 Attorney 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 8th day of May, 2020, I served a true and correct copy of the Notice of Intent to Appear by Communication Equipment by using the Wiz-Net E-Service addressed to the following email registered on the E-Service List for this case as follows:

Alex B. Ghibaud, Esq.
alex@glawvegas.com
Attorney for Plaintiff

By: Kari Colli
Employee of Hanratty Law Group

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES**

May 13, 2020

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

May 13, 2020 4:00 PM Minute Order

HEARD BY: Gentile, Denise L**COURTROOM:** Chambers**COURT CLERK:** Melissa McCulloch**PARTIES:**

Abby Reed, Subject Minor, not present
Amanda Reed, Defendant, Counter Claimant, Carrie Primas, Attorney, not present
not present
Devin Reed, Plaintiff, Counter Defendant, not Alex Ghibaudo, Attorney, not present
present
Shawn Reed, Subject Minor, not present

JOURNAL ENTRIES

- NRCP 1 and EDCR 1.10 state the procedure in district courts shall be administered to secure efficient, speedy, and inexpensive determinations in every action. Pursuant to Administrative Order 20-01, this Court may issue a decision on the papers.

COURT heard this matter on 5/13/2020 and took the matter under advisement. COURT FINDS that Mom filed a Motion to Modify Custody Requesting the following:

- o For this Court to Adopt Dr. Paglini's recommendations as it pertains to legal custody and recommendations for Dad to take parenting classes and anger management classes
- o Issue OSC against Dad for violation of the Mutual Behavior Order and other Others of this Court
- o PPC
- o Attorney's fees and costs

PRINT DATE:	05/13/2020	Page 1 of 5	Minutes Date:	May 13, 2020
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

APPX0836

COURT FINDS that Dad filed a Countermotion seeking the following relief:

- Requesting:

- o Deny Mom's Motion
- o Enter a Protective Order on behalf of the children against Mom's boyfriend, Jeffrey Eatherly
- o Enter an Order sealing the parties' case file pursuant to NRS 125.110
- o Declare Mom a vexatious litigant
- o Sanction Mom and her counsel pursuant to EDCR 7.60(b)
- o Suspend his Child Support obligation temporarily since he was furloughed from MGM
- o Admonish Mom regarding her failure to abide by the Honk-and-Seat Belt Rule
- o Attorney's fees

COURT heard compelling argument from both parties. COURT has reviewed the filings of both parties, and considered the concerns raised by each. COURT is very concerned for the parties' children, Abby being the most at risk at the present. COURT FINDS that Dr. Paglani's concerns are echoed by this Court. While Dad may have some defenses to his behavior at times, may be goaded by the behavior of mom and her father, may think that it is appropriate to intimidate or scare those around him, including scare his daughter with a gun, this Court FINDS that this is unacceptable. The sad thing is, the lack of awareness of this behavior and how it affects the children. COURT FINDS that this does not excuse the behavior of Mom which this Court FINDS is likely a result of the unhealthy relationship with Dad. That being said, one of the things that should cease immediately is the involvement of Ms. Reed's father. While this Court understands that exchanges are the time the parents have contact, and Ms. Reed wants to document said exchanges to keep the peace, the peace is broken when there is a hostile individual present who is videotaping all interactions. Each parent needs to have the assistance of resources available to them to move forward in parenting these children, or they will forever have difficulty with co-parenting, and the children will be the victims of this unhealthy and tumultuous situation, sadly it will follow them into adulthood and their own interpersonal relationships, where they will have dysfunction, all due to the current situation which could be avoided if these parents acted like dignified and rational human beings that cared about their children and understood how their behavior affects the children.

In this regard, Court FINDS the following orders are in the children's best interests.

COURT ORDERS as follows:

- 1) Dad shall take a minimum of 20 sessions of anger management classes which are available online, and provide proof of the same to the Court.

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APPX0837