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#### View Message



From: **Devin Reed** 06/23/2020 at 09:25 AM

To: Amanda Reed

Subject: RE: Abby cheek

So what happened?

From: **Amanda Reed** 06/22/2020 at 08:18 PM

To: Devin Reed Subject: Abby cheek

Abby's eye/ cheek is raised (swollen) and there is a mark. She is complaining it hurts to smile and squint. We are at Summerlin hospital so they can look at it.





Re: RE: Abby cheek

Today at 02:40 PM

Metro was notified due to Abby's accounts of what happened. I took her straight from the exchange. I have pictures at the exchange but they did not show the puffiness of her face. When I asked her if it hurt and she said yes, I decided to take her in to make sure nothing more happened to her cheek than tenderness caused by getting flicked on Saturday.

From: **Devin Reed** 

06/24/2020 at 02:23 PM

To: Amanda Reed

Subject: Re: RE: Abby cheek

What is that? Metro?

From: **Amanda Reed** 06/23/2020 at 10:45 PM































Electronically Filed
7/2/2020 1:42 PM
Steven D. Grierson
CLERK OF THE COURT

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2 | Alex B. Ghibaudo, Esq.

Nevada Bar No. 10592

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Attorneys for Plaintiff

## FAMILY DIVISION CLARK COUNTY, NEVADA

11 DEVIN REED,

Plaintiff,

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VS.

15 AMANDA REED,

Defendant.

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Case Number: D-18-568055-D

Department: F

#### PLAINTIFF'S SUPPLEMENTAL PLEA FOR RELIEF

**COMES NOW**, Plaintiff DEVIN REED, by and through his attorney of record, MICHANCY M. CRAMER, ESQ., of ALEX GHIBAUDO, P.C., and hereby files this *Supplemental Plea for Relief*.

This Supplemental Plea for Relief is based upon the attached Memorandum of Points and Authorities, any supporting exhibits provided in Defendant's Exhibit Appendix on file herein, the attached Declaration of Devin Reed, any/all pleadings and papers on file herein, and any further evidence or argument presented to the Court at the hearing of this matter.

APPX0924

1	As se	et forth herein, Devin respectfully requests that the Court:
2	1.	Modify custody and grant Devin primary physical custody of the
3		minor children and require the Defendant to get a mental health
4		evaluation to determine if she has the ability to safely co-parent the
5		minor children;
6	2	
7	2.	In the alternative, modify the custodial timeshare;
8	3.	Modify the school placement of the minor children;
9	4.	Reinstate Devin's legal custody of the minor children;
11	5.	Order the Defendant to be drug tested;
12	6.	Grant Devin the relief requested in his Opposition and
13		Countermotion; and
14	7.	Enter an Order denying Defendant's Motion in its entirety;
15 16	8.	Award Devin his fees and costs; and
17	9.	Award Devin any other relief this Court deems just and appropriate.
18	DAT	ED this 2nd day of July, 2020.
19		Respectfully Submitted,
20		//s//Alex Ghibaudo
21		Alex Ghibaudo, Esq.
22		Attorney for Plaintiff
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# MEMORANDUM OF POINTS AND AUTHORITIES I. INTRODUCTION

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

Amanda has engaged in a pattern of harassment, threats, alienation, and pathogenic parenting since the Parties separated. Her actions are detrimental to the welfare of the minor children and this Court must take action to stop her. Even as this Supplemental Pleading was being drafted, Amanda's behavior continues. Sadly, she is so focused on tearing down Devin, she has neglected to protect the children.

As this Court is aware, her boyfriend, Jeffery Eatherly ("Jeff"), is currently incarcerated in the Clark County Detention Center on charges of Sexual Assault Against Child Under 14, Lewdness W/Child Under Age 14, and Use/Permit Miner Under 14 To Produce Pornography. Amanda has claimed that Jeffrey was not her boyfriend, but rather a family friend who acted as a handyman. That is false. Amanda has been dating Jeff for over a year. Exhibit 1 is a picture of Amanda, Jeff, and Jason Debose from April, 2018. Exhibit 2 is a screenshot of a text exchange between Amanda and Ivette Guttierez showing Jeff playing with Abby

and Amanda's happiness at the scene. Exhibit 3 is a picture of Jeff and Amanda sitting at a table at Ava's 2<sup>nd</sup> Birthday party. Ava is believed to be the child of Cristal Tampke. Cristal is dating Jason Debose. Exhibit 4 is Christal Tampke's Facebook profile picture showing her kissing Jason Debose, demonstrating that they are a couple. Exhibit 5 is a screenshot of Jason Debose's Facebook friends, showing he is connected to Christal Tampke on social media. Exhibits 6 and 7 are from a Tuff N Uff event on June 29, 2019 at the Thomas & Mack Center at UNLV. They show Amanda and her father with Jeff and several other people. Exhibit 6 clearly shows Amanda and Jeff sitting together. Exhibit 8 is a series of screenshots from a video of Amanda and Jeff leaving the house together. The video is available for the Court to view upon request and it will be included as part of Devin's trial exhibits.

In addition to Amanda clearly not supervising Jeff with Abby, Amanda's other choices are concerning. Christal Tampke is dating Jason Debose. Amanda and Jeff spent time with them, as shown in Exhibits 1 and 3. Jason is not a safe person to be around and Amanda certainly should not be allowing such a person into the children's lives. Jason has an extensive criminal history dating back many years. Exhibits 9 and 10 are the Register of Actions from the Eighth District Court and Henderson Justice Court showing what is at least part of Jason's criminal history. Amanda uses Jason as a babysitter during her custodial time. Upon information and belief, Amanda and Jason also work together to sell Amanda's prescription medication.