

Electronically Filed  
Jan 10 2022 11:22 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**AFFT**

Alex B. Ghibaud, Esq.  
Nevada Bar No. 10592  
**ALEX GHIBAUDO, PC**  
703 South Eighth Street  
Las Vegas, Nevada 89101  
T: (702) 978-7090  
E: alex@abgpc.com  
*Attorney for Plaintiff*

**EIGHTH JUDICIAL DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA**

DEVIN REED,

Plaintiff,

vs.

AMANDA REED,

Defendant.

Case Number: D-18-568055-D

Department: F

**AFFIDAVIT OF PLAINTIFF DEVIN REED IN SUPPORT OF  
PLAINTIFF'S SUPPLEMENTAL PLEA FOR RELIEF**

COUNTY OF CLARK    )  
                                  ) ss:  
STATE OF NEVADA    )

**I, DEVIN REED, being first duly sworn, deposes and says:**

1. I am the Plaintiff in the above-entitled action.
2. I am competent to testify to the facts contained in this Affidavit.
3. I am asking the Court for a modification in custody, as to our two children ("Abby" and "Shawn"); and for an award of primary physical custody.

1           4.     Amanda has engaged in a pattern of harassment, threats, alienation,  
2           and pathogenic parenting since we separated. Her actions are detrimental to the  
3           welfare of our children and this Court must take action to stop her. Even as this  
4           Supplemental Pleading was being drafted by my counsel, Amanda's behavior  
5           continued. Sadly, she is so focused on tearing me down, that she has neglected to  
6           protect our children.  
7

8  
9           5.     As this Court is aware, Amanda's boyfriend, Jeffery Eatherly ("Jeff"),  
10          is currently incarcerated in the Clark County Detention Center on charges of  
11          Sexual Assault Against Child Under 14, Lewdness W/Child Under Age 14, and  
12          Use/Permit Minor Under 14 To Produce Pornography.  
13

14  
15          6.     Amanda has claimed that Jeffrey was not her boyfriend, but rather a  
16          family friend who acted as a handyman. That is false. Amanda has been dating  
17          Jeff for over a year. Exhibit 1 is a picture of Amanda, Jeff, and Jason Debose from  
18          April, 2018. Exhibit 2 is a screenshot of a text exchange between Amanda and  
19          Ivette Gutierrez showing Jeff playing with Abby and Amanda's happiness at the  
20          scene. Exhibit 3 is a picture of Jeff and Amanda sitting at a table at Ava's 2<sup>nd</sup>  
21          Birthday party. Ava is believed to be the child of Cristal Tampke. Cristal is dating  
22          Jason Debose. Exhibit 4 is Christal Tampke's Facebook profile picture showing  
23          her kissing Jason Debose, demonstrating that they are a couple. Exhibit 5 is a  
24          screenshot of Jason Debose's Facebook friends, showing he is connected to  
25          Christal Tampke on social media. Exhibits 6 and 7 are from a Tuff N Uff event on  
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1 June 29, 2019 at the Thomas & Mack Center at UNLV. They show Amanda and  
2 her father with Jeff and several other people. Exhibit 6 clearly shows Amanda and  
3 Jeff sitting together. Exhibit 8 is a series of screenshots from a video of Amanda  
4 and Jeff leaving the house together. The video is available for the Court to view  
5 upon request and it will be included as part of my trial exhibits.  
6

7  
8 7. In addition to Amanda clearly not supervising Jeff with Abby,  
9 Amanda's other choices are concerning. Christal Tampke is dating Jason Debose.  
10 Amanda and Jeff spent time with them, as shown in Exhibits 1 and 3. Jason is not  
11 a safe person to be around and Amanda certainly should not be allowing such a  
12 person into the children's lives. Jason has an extensive criminal history dating  
13 back many years. Exhibits 9 and 10 are the Register of Actions from the Eighth  
14 District Court and Henderson Justice Court showing what is at least part of Jason's  
15 criminal history. Amanda uses Jason as a babysitter during her custodial time.  
16 Upon information and belief, Amanda and Jason also work together to sell  
17 Amanda's prescription medication.  
18

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21 8. Amanda has a history of being prescribed very powerful pain killers.  
22 Her prescription history shows that from 2017 through 2019 she was being  
23 prescribed 90 15mg oxycodone, 30 15mg morphine sulfate, and 30 15mg  
24 meloxicam each month. According to WebMD the oxycodone and morphine  
25 sulfate are both opioids and the meloxicam is an NSAID. As stated, it is believed  
26 that Jason Debose helps Amanda sell her pills for additional income. If Amanda is  
27  
28

1 not selling the pills, her prescription history shows she is taking 60mg of opioids a  
2 day. That is an extraordinary amount of narcotics for her to be taking each day.  
3 She certainly could not drive the children around (as she currently does) and it  
4 boggles the mind to think that she could teach a classroom of elementary school  
5 children with that much medication in her system. If she were to stop taking that  
6 amount of opioids each day, she would likely require medical intervention in order  
7 to quit. All of these factors lead me to believe that Amanda is not actually taking  
8 the medication, but selling it. The Court should consider having her tested. If she  
9 tests positive, that would confirm she is taking opioids. If she tests negative, that  
10 would indicate she is likely selling the medication.  
11  
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14 9. In addition to Amanda's questionable judgment placing the children at  
15 risk, she also calls the police and Child Protective Services (CPS) on me on a  
16 regular basis. Exhibit 13 is just three (3) of the 15 calls to the Las Vegas  
17 Metropolitan Police Department ("metro") that Amanda has made in the last 18  
18 months. At this point, I am friendly with the police officers that patrol my  
19 neighborhood, they recognize me and sympathize with me when Amanda sends  
20 them out to his house. It is preposterous that Amanda would behave in such a way.  
21 It may very well be that the constant calls to Metro and CPS are tied to Amanda's  
22 prescription drug use.  
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26 10. Amanda's calls to CPS are just as bad. She has now made at least  
27 seven (7) calls to CPS in the last 18 months. The calls have all been deemed  
28



1 unsubstantiated. The latest call was made just recently on June 22, 2020. Amanda  
2 got the children back from me and took Abby to Summerlin Hospital, claiming  
3 Abby's face and eye were swollen from being "flicked." (See Exhibits 14 and 15.)  
4 I had Abby that weekend and there was nothing wrong with her eye or cheek and  
5 she was not "flicked." Exhibit 16 is a picture of her in the pool and it is clear she  
6 does not have any bruising on her face.  
7

8  
9 11. As discussed at the last hearing of this matter, Amanda has used her  
10 position as a teacher at the children's school to further alienate me from my  
11 children. She takes the children on my mornings and changes their hair and  
12 clothing, as though their father is incapable of caring for them. She has also taken  
13 Abby and allowed her to hide in her (Amanda's) classroom when I try to pick her  
14 up. Though Amanda claims that Abby was hiding from me in the hallway, she was  
15 actually inside Amanda's classroom with Amanda and Amanda's father, with the  
16 door locked. I did not have to get staff to assist him to find Abby as Amanda  
17 claimed; I had to find staff to help him get the door unlocked because Amanda  
18 refused to unlock it and let me have Abby.  
19  
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21  
22 12. Amanda also claims that I send the children to school in ill-fitting, old  
23 clothes. What actually happens is Amanda takes the children to school and then at  
24 the end of the day, she changes them into old, ill-fitting clothes and gives them to  
25 me. She takes the clothing that I buy for the kids and then I never see the items  
26 again. Last winter alone, I purchased four (4) jackets and not a single one of them  
27 was ever returned to my home – Amanda kept all of them.  
28

1           13. Amanda has also claimed I threw a hammer at her and pulled out a  
2 gun to intimidate Abby. The gun incident simply never happened. During the  
3 divorce Amanda's father pulled a gun on me. After I called the police, Amanda  
4 took the gun and hid it inside her house. Amanda's father had a second gun in his  
5 car at the time. It appears that Amanda has manufactured the claim against me to  
6 distract from the very real incident in which her father threatened me with a gun.  
7 The "hammer" Amanda claims I threw at her was not actually a hammer. It was a  
8 small plastic toy that is not even solid plastic; it is made of soft, pliable plastic and  
9 it is hollow; specifically designed NOT to hurt anyone as it is a child's toy (Exhibit  
10 16.) Further, I did not throw it at Amanda. She is being dishonest with this Court.  
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14           14. Another highly concerning issue is the custodial exchanges with  
15 Amanda. She has routinely brought her father (the same man who pulled a gun on  
16 me) to the custodial exchanges. He would stand by and film me while trying to put  
17 the children in his truck. Amanda grabs Abby and fling her about, riling her up  
18 and escalating the tension of the situation. She would hold onto Abby until I got  
19 close and then allow her to run away.  
20  
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22           15. In one particular instance on April 17, 2020 when I arrived for the  
23 exchange Amanda and her father stood on the sidewalk, silently staring at me, and  
24 pointing their cell phones at me. (See Exhibit 18 for screenshots of the incident.)  
25 When I approached, asking if I could get Shawn into the truck, Amanda stood  
26 silently, refusing to respond. Her father aggressively stepped off the sidewalk as if  
27 to approach me, but Amanda held him back. They stood there, pointing their  
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1 phones at me and refusing to answer him. This went on for approximately two (2)  
2 minutes and in front of the children.

3  
4 16. Later that same day, in another video, Amanda had ahold of Abby.  
5 (See Exhibit 19 for screenshots of the incident.) She flung her off the sidewalk  
6 with her arms wrapped around her. Abby struggled, but Amanda refused to let her  
7 go, she just flinging her back and forth. At one point in the video she can be seen  
8 leaning forward with her hair hanging down, blocking the camera's view of her  
9 and Abby's faces. She is clearly whispering something because she then let Abby  
10 go and Abby ran a short distance away and then turned to watch her parents.  
11 Amanda's father stood by with his phone, filming the entire incident. Eventually I  
12 had to call the police to facilitate the exchange that day.  
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16 17. Shockingly, as this Supplement was being finalized for submission to  
17 the Court, I was notified of yet ANOTHER report filed against me with CPS on  
18 July 1, 2020. (See Exhibit 20.) Amanda simply will not stop. She clearly believes  
19 that as long as she continues to make her outrageous allegations and she continues  
20 to file papers with this Court, she will eventually prevail in her attempts to take  
21 Abby and Shawn away from me. Her behavior is the definition of abuse of process.  
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24 ...

25 ...

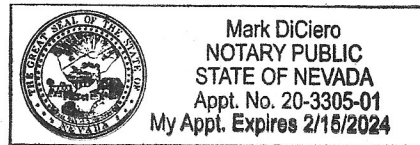
26 ...  
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18. I have read the Supplemental Plea for relief filed concurrently with this Affidavit; and I submit this Affidavit is submitted in good faith.

**DATED** this 7 day of July 2020.

  
Devin Reed

SUBSCRIBED and SWORN to before  
me on this 7 day of July 2020.

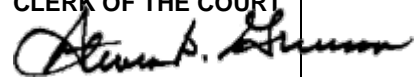


~~NOTARY PUBLIC~~  
in and for said county and state.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\*\*\*\*

Electronically Filed  
7/7/2020 2:50 PM  
Steven D. Grierson  
CLERK OF THE COURT



Devin Bryson Reed, Plaintiff

vs.

Amanda Raelene Reed, Defendant.

Case No.: D-18-568055-D

Department F

**NOTICE OF HEARING**

Please be advised that the Defendant's Notice of Motion and Motion to Strike Rogue Filing Entitled "Plaintiff's Supplemental Plea for Relief" and "Exhibits in Support of Plaintiff's Supplemental Plea for Relief" and for Attorney Fees and Costs in the above-entitled matter is set for hearing as follows:

**Date:** August 14, 2020

**Time:** No Appearance Required

**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/ Juanito Nasarro  
Deputy Clerk of the Court

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Juanito Nasarro  
Deputy Clerk of the Court

APPX0966

*Amanda S. Lamin*

CLERK OF THE COURT

1 **SAO**  
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 Phone: (702) 821-1379  
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. )  
15 ) **STIPULATION AND ORDER TO**  
16 ) **CONTINUE ORDER TO SHOW CAUSE**  
17 ) **HEARING**  
18 AMANDA REED, )  
19 Defendant. )

20 COMES NOW the Plaintiff, Devin Reed, by and through his attorney, Michancy M.  
21 Cramer, Esq., of Alex Ghibaudo, PC, and Defendant, Amanda Reed, by and through her  
22 attorneys, Carrie J. Primas, Esq., of Hanratty Law Group and hereby stipulate and agree as  
23 follows:

24 IT IS HEREBY STIPULATED AND AGREED AND THEREFORE ORDERED that the  
25 Order to Show Cause hearing scheduled for August 5, 2020 at 1:30 p.m., shall be continued to the  
26 date set for trial. It is anticipated that a trial date will be set at the upcoming Pre-Trial Conference.

27 \\\

28 \\\

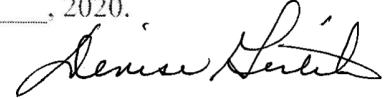
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1 IT IS HEREBY STIPULATED AND AGREED AND THEREFORE ORDERED that the  
2 Pre-Trial Conference scheduled for August 5, 2020 at 1:30 p.m., ~~shall remain on the Court's~~  
3 ~~calendar.~~ shall be heard on 8/5/2020 @ 11:45a.m.

4 IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2020. Dated this 30th day of July, 2020




DBB B0D 1724 7934  
Denise L Gentile  
District Court Judge

5  
6  
7  
8  
9 Dated this 30th day of July, 2020.

Dated this 30 day of July, 2020.

10 HANRATTY LAW GROUP

ALEX GHIBAUDO, PC

11 By:   
12 Carrie J. Primas, Esq.  
13 Nevada Bar No. 12071  
14 1815 Village Center Circle, Suite 140  
15 Las Vegas, Nevada 89134  
16 Phone: (702) 821-1379  
Fax: (702) 870-1846  
Email: attorneys@hanrattylawgroup.com  
Attorney for Defendant, Amanda Reed

By:   
Michaney M. Cramer, Esq.  
Nevada Bar No. 11545  
197 East California Ave., Suite 250  
Las Vegas, Nevada 89104  
Phone: (702) 978-7090  
Fax: (702) 924-6553  
Email: alex@glawvegas.com  
Attorney for Plaintiff, Devin Reed

1 **CSERV**

2  
3 DISTRICT COURT  
CLARK COUNTY, NEVADA

4  
5  
6 Devin Bryson Reed, Plaintiff

CASE NO: D-18-568055-D

7 vs.

DEPT. NO. Department F

8 Amanda Raelene Reed,  
9 Defendant.

10  
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District  
13 Court. The foregoing Stipulation and Order was served via the court's electronic eFile system  
to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 7/30/2020

15 KC Collis

kcollis@hanrattylawgroup.com

16 Carrie Primas

cprimas@hanrattylawgroup.com

17 Main HLG

attorneys@hanrattylawgroup.com

18 Louis Schneider

lcsllawllc@gmail.com

19 Alex Ghibaudo

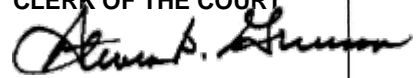
alex@glawvegas.com

20 Michancy Cramer

michancy@glawvegas.com

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22  
23  
24  
25  
26  
27  
28 APPX0969





NEOJ  
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,	)	Case No: D-18-568055-D
	)	Dept No: F
Plaintiff,	)	
	)	
v.	)	<b>NOTICE OF ENTRY OF ORDER</b>
	)	
AMANDA REED,	)	
	)	
Defendant.	)	

Please take notice that a *Stipulation and Order to Continue Order to Show Cause Hearing* was duly entered in the above referenced case on the 30<sup>th</sup> day of July, 2020, a copy of which is attached hereto and by reference fully incorporated herein.

Dated this 31<sup>st</sup> day of July, 2020.

HANRATTY LAW GROUP

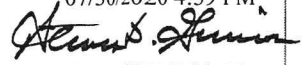
By:   
Carrie J. Primas, Esq.  
State Bar of Nevada No. 12071  
1815 Village Center Circle, Suite 140  
Las Vegas, Nevada 89134  
PH: (702) 821-1379  
FAX: (702) 870-1846  
EMAIL: attorneys@hanrattylawgroup.com  
Attorneys for Defendant, Amanda Reed

1 **CERTIFICATE OF ELECTRONIC SERVICE**

2 I hereby certify that I am an employee of Hanratty Law Group, and on the 31st day of  
3 July, 2020, I served a true and correct copy of the *Notice of Entry of Order* (with Order attached  
4 hereto) by using the Wiz-Net E-Service addressed to the following email registered on the E-  
5 Service List for this case as follows:

6 Alex Ghibaud, Esq.  
7 alex@glawvegas.com  
8 michancy@glawvegas.com  
9 *Attorney for Plaintiff*

10 By: Kari Colli  
Employee of Hanratty Law Group

  
CLERK OF THE COURT

1 **SAO**  
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  
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10 Attorneys for Defendant, Amanda Reed

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

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11 Plaintiff. ) Dept No: F  
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13 AMANDA REED, ) **STIPULATION AND ORDER TO**  
14 Defendant. ) **CONTINUE ORDER TO SHOW CAUSE**  
 ) **HEARING**

15 COMES NOW the Plaintiff, Devin Reed, by and through his attorney, Michancy M.  
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