

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. **Electronically Filed**
Jan 10 2022 11:23 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

4 IT IS SO ORDERED this _____ day of _____, 2020.
5
6
7
8

DBB B0D 17247934
Denise L Gentile
District Court Judge

9 Dated this 30th day of July, 2020.

Dated this 30 day of July, 2020.

10 HANRATTY LAW GROUP

ALEX GHIBAUDO, PC

11 By: Carrie Primas

By: Michael M. Cramer

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

Michael 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 DISTRICT COURT
3 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
14 to all recipients registered for e-Service on the above entitled case as listed below:

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

lcslawllc@gmail.com

19 Alex Ghibaudo

alex@glawvegas.com

20 Michancy Cramer

michancy@glawvegas.com

Divorce - Complaint

COURT MINUTES

August 05, 2020

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

August 05, 2020 11:45 AM Pre Trial Conference

HEARD BY: Gentile, Denise L COURTROOM: Courtroom 03

COURT CLERK: McCulloch, Melissa

PARTIES PRESENT:

Devin Bryson Reed, Counter Defendant, Plaintiff, Present Michancy Moonblossom Cramer, Attorney, Present

Amanda Raelene Reed, Counter Claimant, Defendant, Present Carrie J. Primas, ESQ, Attorney, Present

Abby Reed, Subject Minor, Not Present Harvey Gruber, Attorney, Not Present

Shawn Reed, Subject Minor, Not Present

JOURNAL ENTRIES

PRE-TRIAL CONFERENCE

Attorney Michancy Cramer, Bar No. 11545, present for Plaintiff.

Both parties and Counsel participated via AUDIO VISUAL EQUIPMENT.

Upon inquiry, Attorney Primas represented that Counsel is seeking an additional forty (45) days of discovery and a trial in sixty (60) days. Discussion regarding a possible conflict with Dr. Paglini's schedule, who is listed as a witness in the case. Counsel also represented the parties have stipulated to a temporary modification in the schedule due to the children participating in distance learning and placed the terms on the record.

COURT ORDERED as follows:

1. Pursuant to STIPULATION, the Plaintiff's schedule will be TEMPORARILY MODIFIED as follows: Plaintiff will have the children from Friday at 7:00 a.m. to Monday at 7:00 a.m. Should in-person learning begin, the schedule will revert back to school drop-off.
2. NON-JURY TRIAL set for 10/22/20 at 9:00 a.m. (full day). It is agreed that each side will be permitted three (3) hours to present their case.
3. Discovery will CLOSE on 9/21/20. Court to issue a TRIAL MANAGEMENT ORDER and electronically serve each side with same.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Aug 14, 2020 12:05AM Motion
Courtroom 03 Gentile, Denise L

Oct 22, 2020 9:00AM Non-Jury Trial
Courtroom 03 Gentile, Denise L

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

Devin Bryson Reed, Plaintiff.

vs.

Amanda Raelene Reed, Defendant.

Case No.: D-18-568055-D

Department F

ORDER SETTING CIVIL NON-JURY TRIAL
(Child Custody/Paternity/Visitation/Relocation)

Date of Trial: October 22, 2020

Time of Trial: 9:00 a.m.

Length of Trial: (Full day: timed 3 hours each party per stipulation of counsel)

Pre Trial Memorandum: October 8, 2020

Discovery Close: September 21, 2020

EACH PARTY AND COUNSEL ARE HEREBY ON NOTICE THAT THIS DEPARTMENT'S ORDER SETTING TRIAL MAY BE DIFFERENT THAN OTHER DEPARTMENTS. THE PARTIES MAY NOT STIPULATE TO MODIFY THIS ORDER WITHOUT THE *EXPRESS WRITTEN AUTHORITY* OF THE COURT.

PLEASE TAKE NOTICE that this trial/evidentiary hearing shall be conducted by Blue Jeans video conference, as permitted by the Court's Administrative Orders. The Court will make the accommodations for those appearing by video conference, for purposes of conferring with counsel, or other breaks that are necessary, for purposes of presentation of the case. Further, if you have any witnesses that intend to appear by video-conference, please provide the Court with the proper notice, as well.

THE PARTIES ARE HEREBY ON NOTICE THAT the Court has said: "We have repeatedly stated that we *expect all [court actions] to be pursued in a manner meeting high standards of diligence, professionalism, and competence.*" *Cuzdey v. State*, 103 Nev. 575, 578, 747 P.2d 233 (1987). Further, NRS 1.210(2)-(3) state that every court shall have power to *enforce order in the proceedings before it and compel obedience to its lawful orders.* Failure to abide by this order may result in sanctions

1 pursuant to NRS 22.100, EDCR 5.102(l) and/or EDCR 7.60, including attorney's fees,
2 costs, or even dismissal of this action. **THIS DOCUMENT IS AN ORDER** and simply
3 notes existing laws and rules expected to be followed. "[I]gnorance of the law...is
4 inexcusable." *Mayenbaum v. Murphy*, 5 Nev. 383, 384 (1870). Nevada Code of Judicial
5 Conduct 2.2[4] states, "[i]t is not a violation of this Rule for a judge to make reasonable
6 accommodations to ensure self-represented litigants the opportunity to have their matters
7 fairly heard"; however, this Canon does not indicate that a judge can provide legal advice
8 or assist any participant with litigating his or her case.

9 **IT IS HEREBY ORDERED** that this case shall be set for a **CIVIL NON-JURY**
10 **TRIAL** at the aforementioned date and time. The trial will be held in Department F via
11 Blue Jeans video conference, pursuant to the Court's Administrative Orders.
12 **TELEPHONIC APPEARANCE AT TRIAL, OR EVIDENTIARY HEARING, IS PROHIBITED.**

13 **IT IS FURTHER ORDERED** that each party must *substantially comply* with all
14 parts of EDCR 5.525. A party representing him or herself in proper person is hereby on
15 notice that the forms from the Self-Help Center at Family Court may not adequately
16 address all of the requirements of this Order. This situation will **not** be considered a basis
17 to supersede or forego the requirements of this Order.

18 **THE PARTIES ARE HEREBY ON NOTICE** that, unless requested in writing,
19 this Court will normally waive calendar calls for judicial economy since it does not stack
20 trials. Despite this protocol, pursuant to EDCR 5.525(a): "the designated trial attorneys
21 for all the parties [or a party *in proper person*] **shall meet** together [**at least 7 days** prior
22 to the scheduled trial date] and arrive at [any] stipulations and agreements, for the
23 purpose of simplifying the issues to be tried."

24 **IT IS FURTHER ORDERED** that the pretrial memorandum **must be filed and**
25 **served upon all the other parties by October 8, 2020.** This Court reminds the parties that
26 document and witness list disclosures are due prior to this date pursuant to NRCP
27 16.2/NRCP 16.205, and that EDCR 5.525(a) clarifies that, "no new exhibits or witnesses
28 are to be added, although previously disclosed witnesses or exhibits may be eliminated."

THE PARTIES ARE HEREBY ON NOTICE that, pursuant to the Court's
Administrative Orders, the actual proposed trial exhibits need to be electronically
submitted to the Court Clerk by sending an evidence submission request to

1 FCEvidence@clarkcountycourts.us. Once the submission request is received, a reply
2 with a link to upload evidence will be provided. Trial exhibits need to be electronically
3 uploaded at least two (2) days before trial. In addition, at least two (2) days before Trial,
4 Trial exhibits may be courtesy copied via email to chambers at
5 DeptFLC@clarkcountycourts.us and DeptFEA@clarkcountycourts.us. Trial exhibits
6 must be attached in pdf format to any email to chambers. Chambers is prohibited from
7 downloading any files from any links sent via email. Trial exhibits should not be filed.
8 See EDCR 5.102(d). **Exhibits for Plaintiff/Petitioner should be marked**
9 **NUMERICALLY** and exhibits for Defendant/Respondent should be marked
10 **ALPHABETICALLY**.

11 **THE PARTIES ARE HEREBY ON NOTICE** that pursuant to EDCR 5.525(b),
12 “the pretrial memorandum must concisely state” proposed positions. Therefore, failure of
13 a party to include arguments with legal citations regarding unusual or complex issues in
14 their pretrial memorandum may be deemed a waiver of said claims at the time of trial.
15 Furthermore, all factors set forth in NRS 125C.0035(4) (“Best interests of child”) **must**
16 be addressed in detail. Additionally, if relocation out of state with a child is an issue
17 pursuant to NRS 125C.006 or 125C.0065, all factors set forth in NRS 125C.007 **must** be
18 addressed in detail. If the case is for non-parent (e.g. grandparent) visitation, all factors
19 set forth in NRS 125C.050 **must** be addressed in detail. If the case is for non-parent
20 custody, all factors set forth in *Locklin v. Duka*, 112 Nev. 1489, 929 P.2d 930 (1996)
21 **must** be addressed in detail. Pursuant to NRS 125C.010, the terms of any proposed
22 custody/visitation schedule must be addressed in detail. If paternity is disputed, the
23 parties **must** address in detail any *relevant* factors set forth in NRS Ch. 126 and/or NRS
24 Ch. 125C, including the presumptions set forth therein.

25 **IT IS FURTHER ORDERED** that pursuant to EDCR 5.102(c), close of
26 discovery shall be **September 21, 2020**. Time deadlines set forth in **NRCP 16.2/NRCP**
27 **16.205** regarding document and witness disclosures will control. The document
28 disclosure list, witness list, and any objections thereto must be filed with the Clerk of
the Court. The opposing party shall then be served (along with all documents and
witness list to be used at trial) within the timeframes set forth in **NRCP 16.2 / NRCP**
16.205. Service must be made via verifiable means (electronic, receipt of copy, personal
service, etc.). Service by mail will **not** be sufficient for document and witness

disclosures. Pursuant to EDCR 5.205(g), exhibits attached to prior motions are not deemed as satisfying the NRCP 16.2/NRCP 16.205 requirements and the parties should review EDCR 5.205(f) to note which documents do not need to be made exhibits. The parties **must** follow EDCR 5.525(b)(8)-(9) and EDCR 5.601 regarding exhibit and witness disclosures. The pretrial memorandum may simply incorporate the above-referenced, filed NRCP 16.2/NRCP 16.205 lists of documents and witnesses.

THE PARTIES ARE HEREBY ON NOTICE that pursuant to NRCP 16.2, NRCP 16.205, and EDCR 5.602(a), all discovery disputes **must** first be heard by the discovery hearing master.

IT IS FURTHER ORDERED that pursuant to EDCR 5.507, if any issues to be addressed at trial include a request to establish or modify child support, spousal support, or alimony, fees and allowances, or any matter involving money to be paid by a party, a Financial Disclosure Form must be filed. The Financial Disclosure Form must include the three (3) most recent paystubs. EDCR 5.507 requires if there has been any material change in a financial disclosure filed within the preceding six (6) months, an updated Financial Disclosure Form must be filed. **IT IS FURTHER ORDERED** that any updated Financial Disclosure Form must be filed and served at least fourteen (14) days prior to the aforementioned trial date. If there has been no material change in a financial disclosure filed within the last six (6) months before the aforementioned trial date, then such must be confirmed within the pretrial memorandum.

THE PARTIES ARE HEREBY ON NOTICE that pursuant to EDCR 5.057, the Court may construe the failure to timely complete an accurate financial disclosure form in support of a motion, opposition, or countermotion not supported by a timely Financial Disclosure Form as admitting that the positions asserted are not meritorious and the Court may enter orders adverse to such party's positions, and the same may be a basis for imposing sanctions.

IT IS FURTHER ORDERED that any requests for attorney's fees and/or costs are not to be included in the pretrial memorandum per EDCR 5.525(b)(6). Any request for costs (as defined in NRS 18.005) must be filed and served in a timely manner which complies with NRS 18.110 and related case law. In accordance with NRCP 54(d)(2), any request for attorney's fees must be requested by a filed motion and served upon the opposing party in a timely manner after the entry of judgment. The request **must** address

1 *all* of the factors outlined in *Brunzell v. Golden Gate*, 85 Nev. 345, 455 P.2d 31 (1969)
2 and *Miller v. Wilfong*, 121 Nev. 619, 119 P.3d 727 (2005), including a detailed billing
3 statement. Pursuant to EDCR 5.507(a) and *Miller*, a **current** Financial Disclosure Form
4 must accompany the motion for attorney's fees unless one was already recently filed for
5 the trial.


6 **IT IS FURTHER ORDERED** that pursuant to EDCR 7.80(a), "counsel must
7 notify the court interpreter's office of a request for interpreter not less than 48 hours
8 before the hearing or trial is scheduled." The Court is not responsible for arranging the
9 interpreter. Additionally, counsel or a *pro per* litigant must contact chambers at least 48
10 hours prior to the trial to have technical equipment set up if he or she intends on
displaying video exhibits during the time of trial.

11 **IT IS FURTHER ORDERED** that pursuant to EDCR 7.30(f), the above trial
12 setting will **not** be vacated by stipulation unless approved beforehand by the department.
13 Any motions to continue a trial date must be in compliance with EDCR 7.30. Finally,
14 pursuant to EDCR 7.30(g), any costs and/or attorney fees may be imposed as a condition
15 of granting the postponement.

16 **IT IS FINALLY NOTED THAT** pursuant to EDCR 5.209(c)-(d), "except by
17 specific order of court, no counsel in a limited or "unbundled" capacity shall be permitted
18 to withdraw within 21 days prior to a scheduled trial or evidentiary hearing. Any notice
19 of withdrawal that is filed without compliance with this rule shall be ineffective for any
purpose."

20 **NOTICE:** The parties are hereby on notice that pursuant to EDCR 7.60(b) and
21 EDCR 5.102(l), failure to abide by this Order may result in sanctions, including
22 attorney's fees or even a "dismissal, default or other order."

Dated this 5th day of August, 2020



419 FC2 5B4B EBD9
Denise L Gentile
District Court Judge

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 Order Setting Civil Non-Jury Trial was served via the court's electronic
14 eFile system to all recipients registered for e-Service on the above entitled case as listed
below:

15 Service Date: 8/5/2020

16 KC Collis

kcollis@hanrattylawgroup.com

17 Carrie Primas

cprimas@hanrattylawgroup.com

18 Main HLG

attorneys@hanrattylawgroup.com

19 Louis Schneider

lcsllawllc@gmail.com

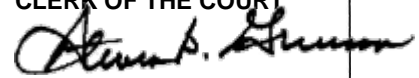
20 Alex Ghibaudo

alex@glawvegas.com

21 Michancy Cramer

michancy@glawvegas.com

22
23
24
25
26
27
28 APPX0982



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
CLARK COUNTY, NEVADA

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

I hereby certify that I am an employee of Hanratty Law Group, and on the 6th day of July, 2020, I served a true and correct copy of the *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* by using the Wiz-Net E-Service addressed to the following email registered on the E-Service List for this case as follows:

Alex Ghibaudo, Esq.
alex@glawvegas.com
Attorney for Plaintiff

By: Kari Colli
Employee of Hanratty Law Group

Case # D-18-568055-D - Devin Bryson Reed, Plaintiffvs.Amanda Raelene Re...

Envelope Information

Envelope Id

6275720

Submitted Date

7/6/2020 1:49 PM PST

Submitted User Name

attorneys@hanrattylawgroup.com

Case Information

Location

Department F

Category

Family

Case Type

Divorce - Complaint

Case Initiation Date

3/20/2018

Case #

D-18-568055-D

Assigned to Judge

Gentile, Denise L

Filings

Filing Type

EFileAndServe

Filing Code

Expert Witness List - LIST (FAM)

Filing Description

Defendant's Initial Expert Witness List

Client Reference Number

Reed, Amanda

Filing on Behalf of

Amanda Raelene Reed

Filing Status

Accepted

Accepted Date

7/6/2020 1:51 PM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
Initial Expert Witness List 7-6-20 (FILED).pdf	Expert Witness List - LIST (FAM)	Public Filed Document	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Louis Schneider	Law Office of Louis Schneider	Yes	7/6/2020 5:39 PM PST
Sent	Alex Ghibaudo		Yes	7/6/2020 4:13 PM PST
Sent	KC Collis	Hanratty Law Group	Yes	7/6/2020 4:23 PM PST
Sent	Carrie J. Primas	Hanratty Law Group	Yes	Not Opened
Sent	Main HLG	Hanratty Law Group	Yes	Not Opened

APPX0984

Filing Type

EFileAndServe

Filing Code

Motion to Strike - MSTR (FAM)

Filing Description

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

Client Reference Number

Reed, Amanda

Filing on Behalf of

Amanda Raelene Reed

Filing Status

Accepted

Accepted Date

7/6/2020 1:51 PM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
Motion to Strike Rogue Filing 7-6-20 (FILED).pdf	Motion to Strike - MSTR (FAM)	Public Filed Document	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Louis Schneider	Law Office of Louis Schneider	Yes	7/6/2020 5:39 PM PST
Sent	Alex Ghibaudo		Yes	7/6/2020 1:52 PM PST
Sent	Carrie J. Primas	Hanratty Law Group	Yes	Not Opened
Sent	Main HLG	Hanratty Law Group	Yes	7/6/2020 4:23 PM PST
Sent	KC Collis	Hanratty Law Group	Yes	Not Opened

Parties with No eService

Name	Address
Abby Reed	
Name	Address
Shawn Reed	
Name	Address
Amanda Raelene Reed	4416 Cinderwood CT North Las Vegas Nevada 89032
Name	Address
Devin Bryson Reed	W 9425 La Madre WAY Las Vegas Nevada 89149

Fees**Expert Witness List - LIST (FAM)**

Description	Amount
Filing Fee	\$0.00

APPX0985

Filing Total: \$0.00

Motion to Strike - MSTR (FAM)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	Amanda Raelene Reed	Transaction Amount	\$3.50
Payment Account	AmEx (MAIN-Kevin)	Transaction Id	7406522
Filing Attorney	Carrie Primas	Order Id	006275720-0
Transaction Response	Payment Complete		

© 2020 Tyler Technologies
Version: 2019.0.6.8724

APPX0986