

EXHIBIT "C"

EXHIBIT "C"

EXHIBIT "C"

APPX1056

7 6% (1)

Our

<

(702) 238-8710>

1:39 AM

lawyer called yours... I am trying here.

Well please tomorrow morning try to make it a happy event for them to see me.

I would like someone else to drop them off. Jason, your sister. William. Anyone other than your father.

Apr 27, 2018, 5:54 PM

Thank you for the pictures. we truly had a magical relationship-and created beautiful babies . I am willing to go to therapy i have made an appointment next Wednesday for at 4pm in Summerlin would you be willing to join me. If only just to communicate? Please.



iMessage

📲 T-Mobile ᅙ

<

(702) 238-8710>

Apr 28, 2018, 1:18 PM

Do you need help paying anything for the kids?

Apr 28, 2018, 6:17 PM

Thank you for having Jason go to pu kids . Very much

Apr 29, 2018, 2:49 PM



Im sending these pictures in good faith I'm trying my best to be amicable. To show you

(A) 0 iMessage

EXHIBIT "D"

EXHIBIT "D"

EXHIBIT "D"

APPX1058

Report Prepared: 07/22/2020

Patient Report

For help using the application please contact:

775-687-5694

Date Range: 07/01/2017 - 07/10/2020

amanda reed

		Linked Records	ords	
Name	DOB	D	Gender	Address
AMANDA SPIELBERG-REED	09/27/1984	3	female	4416 CINDERWOOD CT NORTH LAS VEGAS NV 89032
AMANDA REED	09/27/1984	2	female	4416 CINDERWOOD CT NORTH LAS VEGAS NV 89032
AMANDA SPIELBERG-REED	09/27/1984	3	female	4416 CINDERWOOD CT NORTH LAS VEGAS NV 89032
AMANDA REED	09/27/1984		female	4416 CINDERWOOD CT N LAS VEGAS NV 89032
AMANDA REED	09/27/1984	2	female	4416 CINDERWOOD CT NORTH LAS VEGAS NV 89032

Report Criteria First Name: amanda, Last Name: reed, DOB: 09/27/1984

Summary Opioi		
	Opioids* (excluding buprenorphine)	Buprenorphine*
Total Prescriptions 52 Currer	Current Qty 0.0	0.0 Current Qty 0.0
Total Private Pay 4 Currer	Current MME/day 0.0	0.0 Current mg/day 0.0
Total Prescribers 3 30 Day	30 Day Avg MME/day 0.0	0.0 30 Day Avg mg/day 0.0
Total Pharmacies 3		

Prescriptions

1/4

Filled	9	Written	Drug	ICD-10	QTY	Days	Prescriber	Rx #	Pharmacy*	Refills	Daily Dose	Pymt Type	РМР
04/23/2020	N	04/23/2020	MORPHINE SULF ER 15 MG TABLET		30.0	30	TW RUS	2050035	COSTC (8926)	0/0	15.0 MME	Private Pay	NV
04/23/2020	N	04/23/2020	OXYCODONE HCL 15 MG TABLET		90.0	30	TW RUS	2050034	COSTC (8926)	0/0	67.5 MME	Other	NV
03/25/2020	N	03/25/2020	OXYCODONE HCL 15 MG TABLET	M5030	90.06	30	TW RUS	2049508	COSTC (8926)	0/0	67.5 MME	Other	NV
02/28/2020	N	02/26/2020	MORPHINE SULF ER 15 MG TABLET	M5030	30.0	30	TW RUS	2048958	COSTC (8926)	0/0	15.0 MME	Private Pay	NV
02/27/2020	N	02/26/2020	OXYCODONE HCL 15 MG TABLET		90.06	30	TW RUS	2048957	COSTC (8926)	0/0	67.5 MME	Other	NV
01/29/2020	N	01/29/2020	MORPHINE SULF ER 15 MG TABLET		30.0	30	TW RUS	2048370	COSTC (8926)	0/0	15.0 MME	Private Pay	NV
01/29/2020	N	01/29/2020	OXYCODONE HCL 15 MG TABLET	M5030	90.0	30	TW RUS	2048369	COSTC (8926)	0/0	67.5 MME	Other	NV
12/27/2019	N	12/27/2019	MORPHINE SULF ER 15 MG TABLET	M5030	30.0	30	TW RUS	2047717	COSTC (8926)	0/0	15.0 MME	Other	NV
12/27/2019	N	12/27/2019	OXYCODONE HCL 15 MG TABLET	M5030	0.06	30	TW RUS	2047716	COSTC (8926)	0/0	67.5 MME	Other	NV
11/26/2019	N	10/02/2019	OXYCODONE HCL 15 MG TABLET	M5030	42.0	14	TW RUS	2047068	COSTC (8926)	0/0	67.5 MME	Other	NV
11/22/2019	N	10/02/2019	MORPHINE SULF ER 15 MG TABLET	M5030	14.0	14	TW RUS	2047069	COSTC (8926)	0/0	15.0 MME	Other	NV
08/28/2019	N	08/27/2019	MORPHINE SULF ER 15 MG TABLET	M5030	30.0	30	TW RUS	2064079	WALGR (4041)	0/0	15.0 MME	Comm Ins	NV
08/28/2019	N	08/27/2019	OXYCODONE HCL 15 MG TABLET	M5030	0.06	30	TW RUS	2064078	WALGR (4041)	0/0	67.5 MME	Comm Ins	NV
07/30/2019	m	07/30/2019	MORPHINE SULF ER 15 MG TABLET		30.0	30	TW RUS	2055317	WALGR (4041)	0/0	15.0 MME	Comm Ins	NV
07/30/2019	e	07/30/2019	OXYCODONE HCL 15 MG TABLET		90.0	30	TW RUS	2055316	WALGR (4041)	0/0	67.5 MME	Comm Ins	NV
06/27/2019	e	06/26/2019	MORPHINE SULF ER 15 MG TABLET	M5030	30.0	30	TW RUS	2045685	WALGR (4041)	0/0	15.0 MME	Comm Ins	NV
06/27/2019	n	06/26/2019	OXYCODONE HCL 15 MG TABLET	M5030	0.06	30	TW RUS	2045684	WALGR (4041)	0/0	67.5 MME	Comm Ins	NV
05/28/2019	n	05/28/2019	MORPHINE SULF ER 15 MG TABLET		30.0	30	TW RUS	2036788	WALGR (4041)	0/0	15.0 MME	Comm Ins	NN
05/28/2019	е	05/28/2019	OXYCODONE HCL 15 MG TABLET		90.06	30	TW RUS	2036787	WALGR (4041)	0/0	67.5 MME	Comm Ins	NV
04/23/2019	ო	04/23/2019	MORPHINE SULF ER 15 MG TABLET	M5136	30.0	30	TW RUS	2026193	WALGR (4041)	0/0	15.0 MME	Comm Ins	NV
04/23/2019	e	04/23/2019	OXYCODONE HCL 15 MG TABLET	M5136	90.0	30	TW RUS	2026191	WALGR (4041)	0/0	67.5 MME	Comm Ins	NV
03/19/2019	e	03/18/2019	MORPHINE SULF ER 15 MG TABLET	M5030	30.0	30	TW RUS	2014982	WALGR (4041)	0/0	15.0 MME	Comm Ins	NV
03/19/2019	e	03/18/2019	OXYCODONE HCL 15 MG TABLET	M5030	90.0	30	TW RUS	2014981	WALGR (4041)	0/0	67.5 MME	Comm Ins	NV
02/13/2019	ю	02/13/2019	MORPHINE SULF ER 15 MG TABLET	M5136	30.0	30	TW RUS	2003720	WALGR (4041)	0/0	15.0 MME	Comm Ins	NV
02/13/2019	ю	02/13/2019	OXYCODONE HCL 15 MG TABLET	M5136	0.06	30	TW RUS	2003718	WALGR (4041)	0/0	67.5 MME	Comm Ins	NV
01/03/2019	e	01/01/2019	MORPHINE SULF ER 15 MG TABLET	M5030	30.0	30	TW RUS	1989918	WALGR (4041)	0/0	15.0 MME	Comm Ins	NV
01/03/2019	e	01/01/2019	OXYCODONE HCL 15 MG TABLET	M5030	90.0	30	TW RUS	1989917	WALGR (4041)	0/0	67.5 MME	. Comm Ins	N
12/06/2018	e	12/04/2018	MORPHINE SULF ER 15 MG TABLET	M5030	30.0	30	TW RUS	1980917	WALGR (4041)	0/0	15.0 MME	Comm Ins	NV

AMANDA REED, DOB: 09/27/1984, Created On: 07/22/2020

2/4

Filled •	₽	Written	Drug	ICD-10	QTY	Days	Prescriber	Rx #	Pharmacy*	Refills	Daily Dose	Pymt Type	РМР
12/06/2018	e	12/04/2018	OXYCODONE HCL 15 MG TABLET	M5030	90.06	30	TW RUS	1980916	WALGR (4041)	0/0	67.5 MME	Comm Ins	NV
11/07/2018	e	11/06/2018	MORPHINE SULF ER 15 MG TABLET	M5030	30.0	30	TW RUS	1972603	WALGR (4041)	0/0	15.0 MME	Comm Ins	NN
11/07/2018	e	11/06/2018	OXYCODONE HCL 15 MG TABLET	M5126	90.06	30	TW RUS	1972602	WALGR (4041)	0/0	67.5 MME	Comm Ins	NN
07/13/2018	e	07/12/2018	OXYCODONE-ACETAMINOPHEN 5-325	NC	20.0	5	FRSTI	1937929	WALGR (4041)	0/0	30.0 MME	Privațe Pay	NN
07/09/2018	e	06/29/2018	OXYCODONE-ACETAMINOPHEN 5-325	G89.18	30.0	7	FRSTI	1936810	WALGR (4041)	0/0	32.14 MME	Comm Ins	NV
07/09/2018	e	06/29/2018	ALPRAZOLAM 0.5 MG TABLET	F41.9	8.0	80	FRSTI	1936811	WALGR (4041)	0/0		Comm Ins	NN
03/27/2018	-	03/27/2018	MORPHINE SULF ER 15 MG TABLET	M5030	60.0	30	TE DEL	00616750	GREEN (6454)	0/0	30.0 MME	Comm Ins	NV
03/27/2018	-	03/27/2018	OXYCODONE HCL 30 MG TABLET	M5030	90.06	30	TE DEL	00616749	GREEN (6454)	0/0	135.0 MME	Comm Ins	NN
02/28/2018	-	02/28/2018	MORPHINE SULF ER 15 MG TABLET		60.0	30	TE DEL	00615411	GREEN (6454)	0/0	30.0 MME	Comm Ins	NV
02/28/2018	-	02/28/2018	OXYCODONE HCL 30 MG TABLET	M5136	90.06	30	TE DEL	00615410	GREEN (6454)	0/0	135.0 MME	Comm Ins	NN
01/23/2018	-	01/23/2018	MORPHINE SULF ER 15 MG TABLET	M5136	60.0	30	TE DEL	00614392	GREEN (6454)	0/0	30.0 MME	Comm Ins	NV
01/23/2018	-	01/23/2018	OXYCODONE HCL 30 MG TABLET	M5136	90.06	30	TE DEL	00614389	GREEN (6454)	0/0	135.0 MME	Comm Ins	NN
12/19/2017	-	12/19/2017	MORPHINE SULF ER 15 MG TABLET		60.0	30	TE DEL	06139253	GREEN (6454)	0/0	30.0 MME	Comm Ins	NN
12/19/2017	-	12/19/2017	OXYCODONE HCL 30 MG TABLET		90.06	30	TE DEL	06139252	GREEN (6454)	0/0	135.0 MME	Comm Ins	NN
11/27/2017	e	11/22/2017	OXYCODONE HCL 30 MG TABLET		90.0	30	TE DEL	1865468	WALGR (4041)	0/0	135.0 MME	Comm Ins	NN
11/24/2017	e	11/22/2017	MORPHINE SULF ER 15 MG TABLET		60.0	30	TE DEL	1865467	WALGR (4041)	0/0	30.0 MME	Comm Ins	NN
10/26/2017	e	10/25/2017	MORPHINE SULF ER 15 MG TABLET		60.0	30	TE DEL	1856444	WALGR (4041)	0/0	30.0 MME	Comm Ins	NV
10/26/2017	n	10/25/2017	OXYCODONE HCL 30 MG TABLET		90.06	30	TE DEL	1856447	WALGR (4041)	0/0	135.0 MME	Comm Ins	NN
09/28/2017	e	09/27/2017	OXYCODONE HCL 30 MG TABLET		90.06	30	TE DEL	1847375	WALGR (4041)	0/0	135.0 MME	Comm Ins	NV
09/27/2017	n	09/27/2017	MORPHINE SULF ER 15 MG TABLET		60.0	30	TE DEL	1847376	WALGR (4041)	0/0	30.0 MME	Comm Ins	NN
08/23/2017	e	08/10/2017	MORPHINE SULF ER 15 MG TABLET		60.0	30	TE DEL	1836774	WALGR (4041)	0/0	30.0 MME	Comm Ins	NN
08/23/2017	ო	08/10/2017	OXYCODONE HCL 30 MG TABLET		0.06	30	TE DEL	1836773	WALGR (4041)	0/0	135.0 MME	Comm Ins	NN
07/14/2017	e	07/13/2017	MORPHINE SULF ER 15 MG TABLET		60.0	30	TE DEL	1825687	WALGR (4041)	0/0	30.0 MME	Comm Ins	NN
07/14/2017	0	07/13/2017	OXYCODONE HCL 30 MG TABLET		90.0	30	TE DEL	1825688	WALGR (4041)	0/0	135.0 MME	Comm Ins	NN

AMANDA REED, DOB: 09/27/1984, Created On: 07/22/2020

*Per CDC guidance, the MME conversion factors prescribed or provided as part of medication-assisted treatment for opioid use disorder should not be used to benchmark against dosage thresholds meant for opioids prescribed for pain. Buprenorphine products have no agreed upon morphine equivalency, and as partial opioid agonists, are not expected to be associated with overdose risk in the same dose-dependent manner as doses for full agonist opioids. MME = morphine milligram equivalents. mg = dose in milligrams.



3/4

AMANDA REED, DOB: 09/27/1984, Created On: 07/22/2020

Name	► Address	City	State	Zip	Phone
TEODORA B DEL PILAR	2649 WIGWAM PKWY	HENDERSON	NV	89074	(702) 822-1881
TWYLA R RUSSELL	6465 W SAHARA AVE	LAS VEGAS	NN	89146	(702) 483-6200
FRANK L STILE, MD	8954 SPANISH RIDGE AVE	LAS VEGAS	NN	89148	(702) 243-9555

		Dispensers			
Pharmacy	Address	City	State	Zip	Phone
WALGREEN CO. (4041)	4771 W CRAIG RD	NORTH LAS VEGAS	NV	89032-2501	(702) 656-1221
GREEN VALLEY PHARMACY (6454)	2245 N GREEN VALLEY PKWY	HENDERSON	NV	89014	(702) 565-3374
COSTCO WHOLESALE CORPORATION (8926)	801 S PAVILION CENTER DR	LAS VEGAS	NV	89144	(702) 352-2052

Disclaimer:

Report contents are based on data entered by dispensers and their staff, and may contain errors. The Board of Pharmacy recommends independent verification with dispensers when prudent or necessary. Willful disclosure of prescription information may be subject to disciplinary action, civil penalties or criminal action.

EXHIBIT "E"

EXHIBIT "E"

EXHIBIT "E"

APPX1063

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<u>Nevada > Las Vegas > School > School Profile</u> ACADEMICS Kitty Mcdonough Ward Elementary School

Unclaimed 5555 Horse Drive, Las Vegas, NV 89131 Crark County School District (702) 799-4501 Contact info Grades PK-5 Students 792 Type Public See contact info and more Mewl REATSCHOOLS RATING

Reviews 58 Students 792 Type Public

Public

schools Save Review 5555 Horse Drive, Las Vegas, NV 89131

Welcome!

You're seeing our new, improved GreatSchools School Profile.

Take a quick tour Not right now

Nearby schools Save Review

Kitty Mcdonough Ward Elementary School

ıÅ,

School board finder

Learn more about this district's school board and $\underline{how \ you \ can \ get \ involved}.$ Powered by XQ

Defendant 0008 APPX1064

X

ACADEMICS

This school is rated above average in school quality compared to other schools in Nevada. Students here perform <u>above average</u> on state tests, <u>... More</u> are making <u>above :</u> year-over-year academic improvement, and this school has <u>above average</u> results in how well it's serving disadvantaged students.

How is this district responding to COVID-19? Find out >>

ACADEMICS

Test scores

EQUITY Equity overview 3 Race/ethnicity. Low-income students 3 Students with disabilities ENVIRONMENT <u>Student demographics</u> <u>Discipline & attendance</u> <u>Teachers & staff</u> <u>Neighborhood</u>



Academic progress
How much did this school help its stud

improve from one year to the next? Th compares schools with similar proficie levels to measure student progress ove

APPX1065

Share

A promising sign:

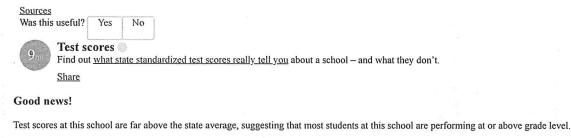
We're here for you. Find COVID-19 at-home learning resources here.

Students at this school are making more academic progress from one grade to the next compared to students at other schools in the state.

ACADEMICS Strong progress with high test scores means students have strong academic skills and are making bigger gains than their peers at other schools in the state.



One key way the best schools help all students learn is by giving them voice and choice.



Tag		
Parent tips		
-		

Even high-performing schools can have disparities between student groups. To understand how well this school... More serves all its students, review the information below Equity section. Understand what on-track learning looks like for your child and how you can help at home.

% Proficient				
Math		62%		Details
			State avg: 38%	
Reading		64%		Details
			State avg: 49%	Not
Science		38%		Details son
			State avg: 25%	mis
			<u>confusing?</u>	
Sources				
Was this useful? Yes	No			
L	· · · · · ·			

Equity

8

Equity overview Studies show that diversity in school leads to long-term benefits for students.	Discover why!
Share	

A promising sign:

Disadvantaged students at this school are performing better than other students in the state, though this school may still have achievement gaps.

Parent tip:				
Does this school offer opportun	ity for all its students, or leave some be	nind? Successful schools understand he	ow to close the achievement gap.	
Sources Was this useful? Yes No Max Race/ethnicity Sources These 5 tips to start a	o a conversation at your school about help	ing all students succeed.		
	<u>iscipline & attendance</u> progress different student groups have are how well a school is helping kids le		chool compared to schools with si	imilar proficiency levels ac
All students		8		
White (54% of students)				

Hispanic (23% of students)		Notice something missing or Sources
We're here for y Low-income students	you. Find COVID-19 at-home learning resources here.	Was this useful? Yes N
ACADEMICS How a school's approach to at-risk students affects you Share Academic progressTest scores	ur child.	
These ratings show how much students from low-income househ state.	olds improved academically from one year to the next com	pared to schools with similar proficiency
All students	8	
Low-income (33% of students)		Notice something missing or Sources
Not low-income		Was this useful? Yes N
Students with disabilities		
Shara		
<u>Share</u> <u>Discipline & attendanceTest scoresCommunity feedback</u> % suspended% chronically absent		
This shows the suspension rates for students with disabilities at the	his school compared to the state average. High suspension r	rates mean less time for teaching and lear
	и ОС 55 /20	
Parent tip		
Learn about your child's rights when it comes to school discipline	е.	
All students	4%	n an
n en	State avg: 8%	Notice something missing or
Students with disabilities	6% 	
supports students with learning differences?	State avg: 15%	Do you feel this scho
Answer		
View responses (6) Sources	*	
Was this useful? Yes No		
ENVIRONMENT		
School board finder		
Learn more about this district's school board and how	you can get involved.	
General information Edit		
OverviewCalendar Here you can learn about this school's hours, enrollment, sports,	classes and more. An administrator from this school will ne	eed to "claim" the profile to add this inform
 Are you an administrator at this school? <u>Claim your school's profile</u> to edit general information and sh <u>Learn more.</u> 	are what makes your school unique.	
		ß
Are you a parent or student at this school? <u>Encourage school administrators</u> to claim this school's profile	L.	

Defendant 0011 APPX1067

Share	White Himmedia True and an	sian 4%7%1
We're here for you. Find (WhiteHispanicTwo or more racesBlackAs COVID-19 at-home learning resources here.	Native American <u>Sc</u> W:
4%		us
10% .	33%	
23%	Gender	
	46% 54%	
	Female Male	
Teachers & staff		
What makes a great teacher? <u>The truth may surprise you.</u>		
Share		
Parent tip:		
What's the most important thing to look for in the staff at a school?		
Students per teacher		
Students per counselor 💿		S
Percentage of teachers with 3 or more years experience	98%	
	State avg: 88% TEACHERS & STAFF •	S
Sources Was this useful? Yes No		
	7	
58		
Reviews 0		
3 out of 5 stars	6	
	TOPICAL REVIEWS	
Bullying policy (6) Character (8) Homework (9) Leadership (5) Learning Di	ifferences Support (6) Teachers (9)	
Review this school		
You Ho	ow would you rate your experience at this school?	
Recent comments	Terrible Bad Average Good Great	а А
Parent		
Overall	experience	

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Kitty Ward has some of the best teach				
ACADEMICS	Submitted by a parent - April 16, 2019			
Branci	Report Review	na (ana manga tana an an ging mana apana apana mana		SHOW MO
Parent	Overall experience			
This school is absolutely TERRIBLE. Do yourself and yo nair was cut she was bullied <u>More</u>	ur child a favor and find a school that actually cares about the a	cademic growth an	d safety of your child. My child's	
an was cut she was butted <u>wore</u>	Submitted by a parent - January 07, 2019			
	Report Review			
Parent	Overall experience			Neighbo
The schools staff is hypocritical. They preach and bear gro			to the click in the front office	
rom day one or aren't LDS More	-ut		to the check in the Hold office	
Parent	5555 Horse Drive			
have four children currently attending Kitty Ward Eleme	nte		beech therapy programs are all	
amazing, and my kids have had <u>More</u>			Jooon montpy programs are an	
Parent	Las Vegas, NV 89131			
Worst school I have ever dealt with, this school needs an o	ove		ulled my children and put them	
n another school where they More				
STRONGLY DISAGREE: This school develops strong	g c			
It's hard to promote honesty and integrity when the t	eac			
Report				
	· 2			
	MS THERESA L DOUGLASS - Principal			
· · · · · · · · · · · · · · · · · · ·	(<u>702</u>) <u>799-4501</u> (702) 799-4503			
	Principal email			
as this useful? Yes No				
	Nearest high-performing			
	Nearby schools			
8				
Howard E Heckethorn Elementary School				
Public district PK-5 Las Vegas, NV 0.68 miles				
10		n ar (yean na an an Annais an Annais Annai	na na na antici na ana antana tanàna amin'ny dia mampiasa dia mampiasa amin'ny dia mampiasa amin'ny fivona dia	
Thomas O'roarke Elementary School				
Public district PK-5 Las Vegas, NV 3.54 miles				
8				
Ernest J. May Elementary School				
Public district PK-5 Las Vegas, NV 4.01 miles				

. .

APPX1069 Defendant 0013

Unclaimed 🔘 8680 West Hammer Lane, Las Vegas, NV 89149 Clark County School District (702) 799-4580 Contact info Contact info Grades PK-5 Students 572 Type Public See contact info and more New! GREATSCHOOLS RATING Reviews 58 Students 572 Туре Public Voj.® Nearby. schools Save Review 8680 West Hammer Lane, Las Vegas, NV 89149

Welcome!

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Take a quick tour Not right now

<u>Nearby</u> <u>schools</u> <u>Save</u> <u>Review</u>

Dean Lamar Allen Elementary School

,Å,

School board finder

Learn more about this district's school board and how you can get involved. Powered by XQ

X

This school is rated about average in school quality compared to other schools in Nevada. Students here perform <u>above average</u> on state tests, <u>... More</u> are making <u>above e</u> over-year academic improvement, and this school has <u>below average</u> results in how well it's serving disadvantaged students.

00

How is this district responding to COVID-19? Find out >>

ACADEMICS

Test scores

EQUITY Equity overview Race/ethnicity Low-income students Students with disabilities

ENVIRONMENT <u>Student demographics</u> <u>Discipline & attendance</u> <u>Teachers & staff</u> <u>Neighborhood</u> ACADEMICS

×



Academic progress 🍥

How much did this school help its students improve from one year to the next? This rating compares schools with similar proficiency levels to measure student over time.

Share

A promising sign:

Students at this school are making more academic progress from one grade to the next compared to students at other schools in the state.

Strong progress with high test scores means students have strong academic skills and are making bigger gains than their peers at other schools in the state.



One key way the best schools help all students learn is by giving them voice and choice.

Sources Was this useful? Yes No

Test scores 🔘

Find out what state standardized test scores really tell you about a school - and what they don't.

Share

A promising sign:

Test scores at this school are above the state average. Because test scores in some states are so low, some students at this school may still not be performing at grade level



% Proficient

Even high-performing schools can have disparities between student groups. To understand how well this school... More serves all its students, review the information below Equity section. Understand what on-track learning looks like for your child and how you can help at home.

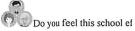
Reading	57%	Details
Math	State avg: 49%	Details
Science	41% State avg: 38%	Not Details <u>son</u>
Sources	State avg: 25% confusing?	mis

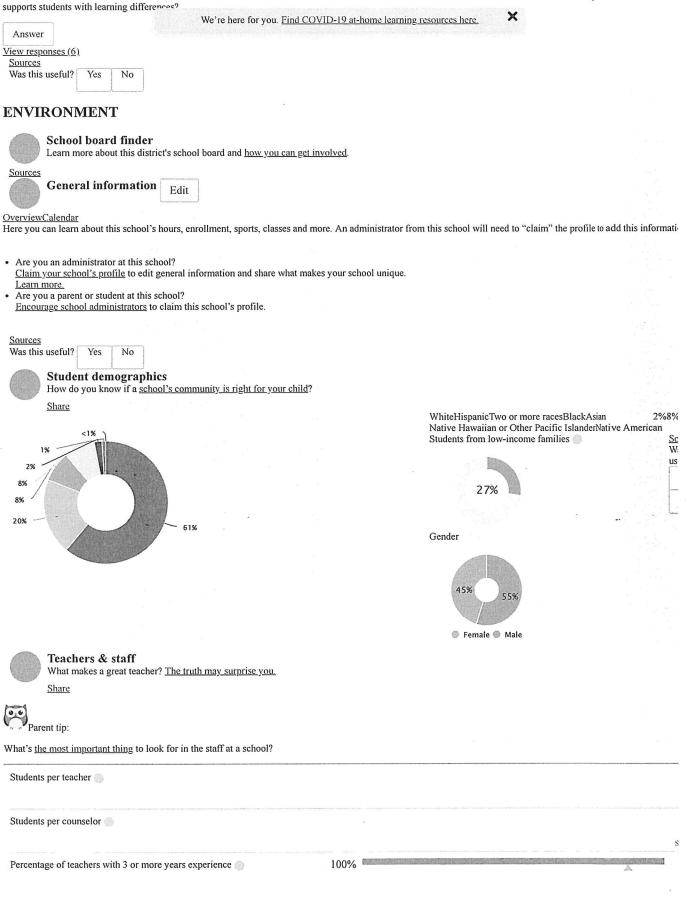


Was this useful? Yes No		
Equity We're here for yo	ou. Find COVID-19 at-home learning resources	shere. X
Equity overview Studies show that diversity in school leads to long-term	benefits for students. Discover why!	* *
Share		
A worrisome sign:		
Disadvantaged students at this school may be falling behind other	students in the state, and this school may have	significant achievement gaps.
0.0		
Parent tip:		
Does this school offer opportunity for all its students, or leave some	e behind? Successful schools understand how	to close the achievement gap.
Sources Was this useful? Yes No		
Race/ethnicity		
These 5 tips to start a conversation at your school about	helping all students succeed.	
<u>Share</u> Academic progressTest scoresDiscipline & attendance		
These ratings reflect how much progress different student groups h		ol compared to schools with similar proficiency levels ac
tate. It's a helpful way to measure how well a school is helping ki	ds learn and advance.	
All students		
White (61% of students)		
Hispanic (20% of students)		Notice something missing or conf Sources
The partice (20% of success)		Was this useful? Yes No
Low-income students		
How a school's approach to at-risk students affects you	r child	
Share		
Academic progressTest scores - These ratings show how much students from low-income househo tate.	lds improved academically from one year to the	e next compared to schools with similar proficiency level
All students		
Low-income (27% of students)		
		Notice something missing or conf Sources
Not low-income		Was this useful? Yes No
Students with disabilities		
Share		
Discipline & attendanceTest scoresCommunity feedback		
% suspended% chronically absent This shows the suspension rates for students with disabilities at thi	s school compared to the state average. High su	spension rates mean less time for teaching and learning.
Parent tip		· · · · · · · ·
<u>earn about your child's rights</u> when it comes to school discipline.		
All students	5%	
		Notice something missing or cont
Students with disabilities	State avg: 8%	·
	A. / (

APPX1072

State avg: 15%





Defendant 0017 PPX1073

	State a TEACHERS & ST	vg: 88% (AFF →	
Sources Was this useful? Yes No	We're here for you. <u>Find COVID-19 at-home</u>	e learning resources here.	
58 Reviews 3 out of 5 stars	8 4 1 2 5		

TOPICAL REVIEWS

Bullying policy (6) Character (7) Homework (7) Leadership (6) Learning Differences Support (6) Teachers (6)

Review this school			
You	How would you ra	te your experience at this school?	
	Te	rribleBadAverageGoodGreat	
Recent comments			
Parent			
Falen	Overall experience		
We loved the teachers and the students, but we hated to enter the fro	ont office or to interact with the principal, w	ho is on a power trip. The front desk staff is notoriously	
demeaning to students and More		12 - ¹² 4 - 1	
NEUTRAL: This school has an effective approach to homework	rk.		
I really do not know if their homework load is normal or exce	ssive.		
<u>Report</u>			
AGREE: Teachers at this school are effective.	a tan in an	2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 -	
They work extra hours to help students.			SHOW MOI
<u>Report</u>			
NEUTRAL: This school develops strong character in its studer	nts, like integrity, compassion and respect.		
The teachers are great, but the administration encourages child they complain.		l emphasizes punishing children and belittling their parents if	
<u>Report</u>			
STRONGLY DISAGREE: Leadership at this school is effective			N
The principal is just a mean, phony. She bullies the children as insulting.		ation. The front office staff is rude, unhelpful and down right	Neighborł
Report			
STRONGLY DISAGREE: This school effectively support			
They ignore students with learning disabilities. My dau		m.	
Report			
STRONGLY DISAGREE: This school effectively deals v			
The principal and the front desk staff are the biggest bu			
<u>Report</u>	2		
Parent 8	3680 West Hammer Lane		
We have been at Dean Allen for 6 years now and the teacher:		X	

We have been at Dean Allen for 6 years now and the teacher:

STRONGLY AGREE: Leadership at this school is effect The principal is very active and works to get to know th Report

Parent

Las Vegas, NV 89149

Treatment of students and discipline is not used to be we're here for you. Find COVID-19 at-home learning resources here.

Parent

Very disappointing, Frustrating, and the principle is obviousl vicious cycle due to how... <u>More</u>

Community member

We moved to this state last summer and chose our home base many other parents that the school... <u>More</u>

DISAGREE: Teachers at this school are effective. The school has been designated an ALM school. They that is introduced to STEM projects.... <u>More</u> <u>Report</u>

DISAGREE: This school has an effective approach to heHomework appears to be mostly busy work. There have <u>Report</u>

> MS JUANITA FRASIER - Principal (702) 799-4580 (702) 799-4586 Principal email

Was this useful? Yes No

Nearest high-performing Nearby schools

Ernest J. May Elementary School Public district | PK-5 | Las Vegas, NV 2.83 miles

8

Henry & Evelyn Bozarth Elementary School Public district | PK-5 | Las Vegas, NV 3.26 miles

9

James Bilbray Elementary School Public district | PK-5 | Las Vegas, NV 4.2 miles

Was this useful? Yes No

ool is a joke. It has become a

X

hool is. I have heard from

the only class in each grade

hey haven't even learned yet.

-

DISTRICT COURT CLARK COUNTY, NEVADA

Divorce - Complaint	t CC	OURT MINUTES	September 18, 2020
D-18-568055-D	Devin Bryson vs. Amanda Raele	Reed, Plaintiff ene Reed, Defend	ant.
September 18, 2020	1:05 AM	Status Check	
HEARD BY: Gent	ile, Denise L		COURTROOM: Courtroom 03
COURT CLERK: M	/lelissa McCulloc	h	
PARTIES: Abby Reed, Subject Amanda Reed, Defe not present Devin Reed, Plainti present Shawn Reed, Subjec	endant, Counter (ff, Counter Defer	Claimant, Carr Idant, not Alex	ie Primas, Attorney, not present Ghibaudo, Attorney, 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 EDCR 5.502(i), this matter came on before the Court on the Chambers Calendar, for decision without a hearing. Pursuant to EDCR 5.502, this Court can grant the requested relief if there is no opposition timely filed.

COURT FINDS that this matter was set because of Plaintiff's supplemental filing that this Court deemed a Motion filed by the Plaintiff. COURT FINDS that it was appropriate to allow the Defendant time to respond to the supplement and to determine future proceedings on the filings. COURT has reviewed the papers and pleadings on filed and has determined that all pending requests will be heard at the time of trial.

PRINT DATE: 09/21/2020	Page 1 of 2	Minutes Date:	September 18, 2020
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

COURT ORDERS that all other requests are DEFERRED. Each party's requests for custody and fees shall be considered at the time of trial.

Plaintiff's counsel may prepare the Order consistent with this Minute Order.

CLERK'S NOTE: On 9/21/20 a copy of the Court's Minute Order was provided to each Attorney via email, if an email address is on record with the Court; if no email address is available then the Minute Order was mailed to the physical address of record. (mt)

INTERIM CONDITIONS:

FUTURE HEARINGS:

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

PRINT DATE:	09/21/2020	Page 2 of 2	Minutes Date:	September 18, 2020

Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

Electronically Filed 9/23/2020 4:59 PM Steven D. Grierson

CLERK OF THE COURT	
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		CLERK OF THE COURT
1	мот	Atump. Sum
2	HANRATTY LAW GROUP	
3	Carrie J. Primas, Esq. State Bar of Nevada No. 12071	
	1815 Village Center Circle, Suite 140	
4	Las Vegas, Nevada 89134	
5	PH: (702) 821-1379	
6	FAX: (702) 870-1846 EMAIL: attorneys@hanrattylawgroup.com	n
7	Attorneys for Defendant, Amanda Reed	
8	DISTRIC	T COURT
9	CLARK COU	NTY, NEVADA
10		
11	DEVIN REED,	Case No: D-18-568055-D
	Plaintiff,	Dept No: F
12	V	NOTICE OF MOTION AND
13	AMANDA REED,	MOTION FOR IN-PERSON TRIAL AND TO STAY ACTION
14	Defendant.	AND TO STAT ACTION
15		Date of Hearing: Time of Hearing:
16		Thine of Hearing.
17		Oral Argument Requested: No
18	TO: Plaintiff, Devin Reed, and his	attorney, Alex B. Ghibaudo, Esq.
19	VOU ARE REQUIRED TO FU	
20		E A WRITTEN RESPONSE TO THIS HE COURT AND TO PROVIDE THE
21		OUR RESPONSE WITHIN FOURTEEN
		THIS MOTION. FAILURE TO FILE A
22		CLERK OF THE COURT WITHIN RECEIPT OF THIS MOTION MAY
23		EF BEING GRANTED BY THE COURT
24	WITHOUT HEARING PRIOR TO THE	SCHEDULED HEARING DATE.
25	\\\	
26		
27		
28		
		i APPX1078
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1	PLEASE TAKE NOTICE that the undersigned will bring the foregoing		
2	Motion on for hearing before the Honorable Denise L. Gentile, in Dept. F,		
3 4	Courtroom #3 of the Eighth Judicial District Court, Family Division located at 601		
4 5	N. Pecos Road, Las Vegas, Nevada on the day of, 2020, at		
6			
7	a.m./p.m. of said day, or as soon thereafter as counsel may be		
8	heard.		
9	COMES NOW the Defendant, Amanda Reed, by and through her attorney,		
10	Carrie J. Primas, Esq., of Hanratty Law Group, and hereby moves the Court for an		
11	order granting the following:		
12			
13	 For trial to be conducted in-person; For the action to be stayed; 		
14	3. For such other and further relief as the Court deems just and proper.		
15	This Motion is made and based on the attached Points and Authorities,		
16	Declaration of Amanda Reed, all papers and pleadings on file herein and argument		
17			
18	of counsel at the hearing on this matter.		
19 20	DATED this 23 rd day of September, 2020.		
20 21	HANRATTY LAW GROUP		
22	Carriennos		
23	Carrie J. Primas, Esq. Nevada Bar No. 12071		
24	1815 Village Center Circle, Suite 140		
25	Las Vegas, Nevada 89134 Attorneys for Defendant, Amanda Reed		
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	ii APPX1079		

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MEMORANDUM OF POINTS AND AUTHORITIES

I.

Statement of Facts

On August 5, 2020, this Court set a trial in this matter via an Order Setting Civil Non-Jury Trial. Trial is currently scheduled for October 22, 2020 and is scheduled to be conducted by Blue Jeans video conference as permitted by the Court's Administrative Orders.

As the Court is well aware, the parties to this case have been embroiled in litigation almost constantly since August, 2018. As the Court is also aware, Amanda has filed two (2) different Motions for orders to show cause for contempt, 13 alleging numerous violations of this Court's Orders by Devin, the most recent of which is set to be heard at the time of trial in this matter.

16 Amanda's Motion to Modify Custody is based on Devin's history of 17 Domestic Violence against her, as well as his neglect of and inability to provide 18 proper care for the minor children. Much of the Domestic Violence is evidenced by 19 audio and video recordings, which were also reviewed and considered by Dr. 20 21 Paglini when conducting his Custodial Evaluation. Much of the evidence related to 22 Devin's failure to provide proper care for the children will also be provided by way 23 of audio and video recordings. Specifically, Amanda has disclosed 116 different 24 25 audio and video recordings. Amanda is unaware of a way for the video evidence to 26 be presented via Blue Jeans, as it would have to be visible to the Court, the witness 27

being questioned, undersigned counsel, and opposing counsel. Further, listening to audio over Blue Jeans, with all the same individuals needing to hear the audio, 3 creates a high likelihood of technical difficulties that will either delay the trial or 5 create issues related to whether the witness is able to hear the recordings as clearly and accurately as possible.

Moreover, the Minute Order filed on May 13, 2020, following the hearing on 8 the same date, makes it clear that truthfulness and veracity of the parties is crucial 9 10 to the Court's consideration of the Defendant's request to modify custody. 11 Specifically, paragraph 7 of the Minute Order states that the Court will conduct an 12 evidentiary hearing "to determine which person's representations are truthful and 13 14 whether either party is litigating this matter in bad faith, or misrepresenting the 15 facts to this Court." As such, it is crucial that the Court is able to ensure that there 16 is no witness tampering or witness coaching, and that the witnesses are abiding by 17 all regular guidelines such as not referring to notes or discussing their testimony 18 19 with other witnesses.

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II.

GOVERNING LAW AND ANALYSIS

A. The Trial should be heard in-person.

Administrative Order 20-17, issued on June 1, 2020 states in pertinent part as 25 follows: 26 27 111

Bench trials in all case types should go forward when possible. Appearances by witnesses, parties, and lawyers should be by alternative means unless the
District Court Judge finds that a personal appearance by an individual
is necessary to conduct the proceeding. Emphasis added. See AO 20-17, pg. 16, ll. 9-11.
This order shall continue to stay trials in civil cases for purposes of tolling
NRCP 41(e) except where a District Court Judge makes findings to lift the stay in a specific case to allow the case to be tried. <i>See</i> AO 20-17, pg. 17, ll.
4-6.
If a personal meeting is necessary, social distancing must be observed and all
participants must wear face coverings covering their noses and mouths. <i>See</i> AO 20-17, pg. 17, ll. 23-25.
As noted shows the Court has show he let a ' 1 th t the start C the
As noted above, the Court has already determined that the outcome of the
pending trial will hinge on the truthfulness of the parties, yet in a trial conducted via
Blue Jeans, the Court will not be able to accurately determine the credibility of the
witnesses as the Court will not be able to read the body language of each witness, or
to ensure that each witness is not reading notes, looking at their phone or another
computer screen, or being coached, or whether another witness is present during
testimony to hear what is being testified to prior to providing their own testimony.
The bulk of the evidence in this case is being provided by way of audio and
video recordings, which will be impossible to accurately share for viewing by the
Court, the witness, and both counsel simultaneously, to ensure accurate review of
the evidence and related evidence. The accusations by both parties are serious –
Defendant alleges a history of domestic violence and neglect by Plaintiff, while
Plaintiff alleges sexual abuse of one of the minor children as well as prescription
³ APPX1082

drug abuse by Defendant. The parties went to the expense of a full Custodial Evaluation performed by Dr. Paglini, a large part of which was the audio and video recordings related to the domestic violence, which will be utilized during his testimony. As the Court is aware, his recommendations ultimately were driven by Plaintiff's history of domestic violence, as well as Plaintiff's reaction when presented with the audio and video recordings in question.

In addition to the above, as this Court is aware, there is absolutely no trust 9 10 between the parties in this case. Both counsel have acknowledged that they are 11 concerned about the trial being conducted via Blue Jeans due to all of the reasons 12 listed above, as well as additional technical issues that have arisen for both parties 13 14 in prior Blue Jeans appearances, and undersigned counsel is confident that, 15 regardless of the outcome of the trial in this case, the non-prevailing party will 16 likely file an Appeal based on any number of concerns, including, but not limited 17 to, potential witness tampering and the Court or witnesses not being able to 18 19 accurately view the evidence during questioning.

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As noted above, Administrative Order 20-17 allows for a trial to go forward 21 in person if the Court determines that a personal appearance is necessary, and further provides guidelines to follow in the case that a personal meeting is necessary. Specifically, all those involved must abide by social distances, and wear 25 face coverings over their noses and mouths. As the Court is aware, the courtroom is 26

sufficiently big enough for the parties to social distance among themselves and from the Court, and all individuals involved can wear face coverings. If the Court has specific concerns related to the health of Judge Gentile, Defendant would request that the trial be conducted by another Family Court Judge, as there are numerous judges conducting in person trials and hearings with social distancing protocols in place.

The parties to this case have been litigating custody issues for almost two (2) 9 10 years. There have been numerous contempt motions, an appeal, and a full Custody 11 Evaluation, and the Court has already highlighted the importance of determining 12 the truthfulness and veracity of the parties. Both sides have made extreme 13 14 allegations about domestic violence, sexual abuse, and drug use, and it is crucial for 15 the witnesses to be able to consider the audio and video evidence at the time of 16 questioning. Further, it is crucial that the Court have the best ability to determine 17 the credibility of the witnesses, especially the parties, without any concern for 18 19 witness tampering, witness coaching, or other inappropriate actions by witnesses.

The Court must note that, in all other circumstances, parties must follow specific procedures if they wish to not appear in person at a trial. Even a party wishing for *child* to testify by alternative means must file a specific Motion requesting the same. The fact that the Nevada Revised Statutes presume that even children, who inarguably should not be subjected to litigation related to their own

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