

1 custody, must testify in person except in certain circumstances, highlights the  
2 importance of a trial being conducted with all testimony being taken in person.

3  
4 As such, Amanda respectfully requests a finding under AR 20-17 that a  
5 personal appearance by all parties and witnesses is necessary to conduct the  
6 proceeding, and, as such, allow for an in-person trial.

7  
8 **B. The action should be stayed.**

9 As outlined in detail below, this Court should stay this action. Pursuant to  
10 NRAP 8(d),<sup>1</sup> the Court must consider the following factors when determining  
11 whether to issue a stay in a civil case involving child custody:

- 12  
13 1. Whether the children will suffer hardship or harm if the stay is either  
14 granted or denied:

15 If the stay is denied, there is a high likelihood that the case will ultimately  
16 result in an appeal following the trial in this matter. Should that happen, the parties  
17 will still not have finality and the children will still be subject to the high conflict  
18 that ongoing litigation creates.

- 19  
20 2. Whether the nonmoving party will suffer hardship or harm if the stay  
21 is granted:

22 Plaintiff will suffer no hardship. He continues to enjoy joint physical  
23 custody, and is currently afforded all weekends with the minor children. Further,  
24 pending trial, his child support obligation has been stayed.

- 25  
26 3. Whether movant is likely to prevail on the merits in the appeal:

27 <sup>1</sup> There is no standard *per se* for a stay in the district court pending appeal. Defendant  
28 submits that the factors in the Nevada Rules of Appellate Procedure should be used in this Court.

1 Defendant believes she will prevail on the merits of a Writ related to whether  
2 the parties are entitled to an in-person trial.

3  
4 4. Whether a determination of other existing equitable consideration, if  
5 any, is warranted.

6 This factor is not relevant.

7 As such, Amanda respectfully requests that, should the Court not see fit to  
8 grant her Motion for In-Person Trial, the trial on this matter be stayed until such  
9 time as a Petition for Writ on the same issue may be decided.  
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**III.**

**Conclusion**

Therefore, based upon the foregoing, Amanda respectfully requests this court  
to enter an order:

1. For trial to be conducted in-person;
2. For the action to be stayed;
3. For such other and further relief as the Court deems just and proper.

DATED this 23<sup>rd</sup> day of September, 2020.

**HANRATTY LAW GROUP**



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

Attorneys for Defendant, Amanda Reed

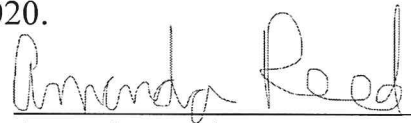
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DECLARATION OF AMANDA REED

STATE OF NEVADA     )  
                                  )ss:  
County of Clark        )

I, Amanda Reed, am the Defendant in the above referenced matter and have read the foregoing Motion, and the factual averments it contains are true and correct to the best of my knowledge, except as to those matters based on information and belief, and as to those matters, I believe them to be true. Those factual averments contained in the referenced filing are incorporated herein as if set forth in full.

Dated this 24<sup>th</sup> day of September, 2020.

  
\_\_\_\_\_  
Amanda Reed

MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

DEVIN REED  
Plaintiff/Petitioner

v.

AMANDA REED  
Defendant/Respondent

Case No. D-18-568055-D

Dept. F

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

**Notice:** Motions and Oppositions filed after entry of a final order issued pursuant to NRS 125, 125B or 125C are subject to the reopen filing fee of \$25, unless specifically excluded by NRS 19.0312. Additionally, Motions and Oppositions filed in cases initiated by joint petition may be subject to an additional filing fee of \$129 or \$57 in accordance with Senate Bill 388 of the 2015 Legislative Session.

**Step 1.** Select either the \$25 or \$0 filing fee in the box below.

- ☒ **\$25** The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.  
-OR-  
☐ **\$0** The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
- ☐ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
  - ☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
  - ☐ The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on \_\_\_\_\_.
  - ☐ Other Excluded Motion (must specify) \_\_\_\_\_.

**Step 2.** Select the \$0, \$129 or \$57 filing fee in the box below.

- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
- ☒ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
  - ☐ The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
- OR-  
☐ **\$129** The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.  
-OR-  
☐ **\$57** The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

**Step 3.** Add the filing fees from Step 1 and Step 2.

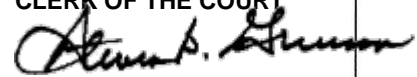
The total filing fee for the motion/opposition I am filing with this form is:

☐\$0 ☒\$25 ☐\$57 ☐\$82 ☐\$129 ☐\$154

Party filing Motion/Opposition: Defendant Date 9/23/20

Signature of Party or Preparer Kari Colli

APPX1089



**CERT**  
**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 COMPLETION OF TRIPLE</b>
	)	<b>P POSITIVE PARENTING PROGRAM</b>
AMANDA REED,	)	
	)	
Defendant.	)	

Please take notice that the Defendant, Amanda Reed, has completed the Court Ordered Triple P Positive Parenting Program on the 12<sup>th</sup> day of September, 2020, a copy of which is attached hereto and by reference fully incorporated herein.

Dated this 24<sup>th</sup> day of September, 2020.

**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

1 **CERTIFICATE OF ELECTRONIC SERVICE**

2 I hereby certify that I am an employee of Hanratty Law Group, and on the 24th day of  
3 September, 2020, I served a true and correct copy of the *Notice of Completion of Triple P Positive*  
4 *Parenting Program* by using the Wiz-Net E-Service addressed to the following email registered  
5 on the E-Service List for case as follows:  
6

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

10  
11 By: Kari Colli  
Employee of Hanratty Law Group  
12  
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Clark County Department of Family Services Parenting Project

# Certificate

This certifies that


**Amanda Reed**

has successfully completed

**Triple P (Positive Parenting Program)**

September 12, 2020

Hours: 20.0  
Client Id: 106517

  
Program Coordinator

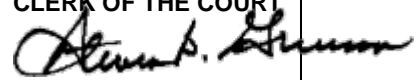
**Parenting Project**  
3900 Cambridge Street, Suite 203  
Las Vegas, NV 89119  
(702) 455-5295



DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*

Electronically Filed  
9/24/2020 10:04 AM  
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 for In-Person Trial and to Stay Action in the above-entitled matter is set for hearing as follows:

**Date:** November 06, 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

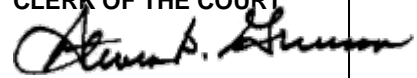
By: /s/ Carmelo Coscolluela  
Deputy Clerk of the Court

**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/ Carmelo Coscolluela  
Deputy Clerk of the Court

APPX1093



**MOT**  
**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

**NOTICE OF MOTION AND  
AMENDED MOTION FOR IN-  
PERSON TRIAL AND TO STAY  
ACTION**

Date of Hearing:  
Time of Hearing:

**Oral Argument Requested: YES**

TO: Plaintiff, Devin Reed, and his attorney, Alex B. Ghibaud, Esq.

YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE CLERK OF THE COURT AND TO PROVIDE THE UNDER-SIGNED WITH A COPY OF YOUR RESPONSE WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING DATE.

\\

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 Courtroom #3 of the Eighth Judicial District Court, Family Division located at 601  
4 N. Pecos Road, Las Vegas, Nevada on the \_\_\_\_ day of \_\_\_\_\_, 2020, at  
5 \_\_\_\_\_ a.m./p.m. of said day, or as soon thereafter as counsel may be  
6  
7 heard.  
8

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 1. For trial to be conducted in-person;
- 14 2. For the action to be stayed;
- 15 3. For such other and further relief as the Court deems just and proper.

16 This Motion is made and based on the attached Points and Authorities,  
17 Declaration of Amanda Reed, all papers and pleadings on file herein and argument  
18 of counsel at the hearing on this matter.

19 DATED this 23<sup>rd</sup> day of September, 2020.

20 **HANRATTY LAW GROUP**

21 

22 \_\_\_\_\_  
23 Carrie J. Primas, Esq.  
24 Nevada Bar No. 12071  
25 1815 Village Center Circle, Suite 140  
26 Las Vegas, Nevada 89134  
27 Attorneys for Defendant, Amanda Reed  
28

1                                   **MEMORANDUM OF POINTS AND AUTHORITIES**

2   **I.**

3   **Statement of Facts**

4                   On August 5, 2020, this Court set a trial in this matter via an Order Setting  
5 Civil Non-Jury Trial. Trial is currently scheduled for October 22, 2020 and is  
6 scheduled to be conducted by Blue Jeans video conference as permitted by the  
7 Court's Administrative Orders.  
8

9                   As the Court is well aware, the parties to this case have been embroiled in  
10 litigation almost constantly since August, 2018. As the Court is also aware,  
11 Amanda has filed two (2) different Motions for orders to show cause for contempt,  
12 alleging numerous violations of this Court's Orders by Devin, the most recent of  
13 which is set to be heard at the time of trial in this matter.  
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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 Paglini when conducting his Custodial Evaluation. Much of the evidence related to  
21 Devin's failure to provide proper care for the children will also be provided by way  
22 of audio and video recordings. Specifically, Amanda has disclosed 116 different  
23 audio and video recordings. Amanda is unaware of a way for the video evidence to  
24 be presented via Blue Jeans, as it would have to be visible to the Court, the witness  
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1 being questioned, undersigned counsel, and opposing counsel. Further, listening to  
2 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  
4 create issues related to whether the witness is able to hear the recordings as clearly  
5 and accurately as possible.  
6

7  
8 Moreover, the Minute Order filed on May 13, 2020, following the hearing on  
9 the same date, makes it clear that truthfulness and veracity of the parties is crucial  
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 whether either party is litigating this matter in bad faith, or misrepresenting the  
14 facts to this Court." As such, it is crucial that the Court is able to ensure that there  
15 is no witness tampering or witness coaching, and that the witnesses are abiding by  
16 all regular guidelines such as not referring to notes or discussing their testimony  
17 with other witnesses.  
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## 21 II.

### 22 GOVERNING LAW AND ANALYSIS

#### 23 A. The Trial should be heard in-person.

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

27 ///

1 Bench trials in all case types should go forward when possible. Appearances  
2 by witnesses, parties, and lawyers should be by alternative means **unless the**  
3 **District Court Judge finds that a personal appearance by an individual**  
4 **is necessary to conduct the proceeding.** Emphasis added. *See* AO 20-17,  
pg. 16, ll. 9-11.

5 This order shall continue to stay trials in civil cases for purposes of tolling  
6 NRCp 41(e) except where a District Court Judge makes findings to lift the  
7 stay in a specific case to allow the case to be tried. *See* AO 20-17, pg. 17, ll.  
4-6.

8 If a personal meeting is necessary, social distancing must be observed and all  
9 participants must wear face coverings covering their noses and mouths. *See*  
10 AO 20-17, pg. 17, ll. 23-25.

11 As noted above, the Court has already determined that the outcome of the  
12 pending trial will hinge on the truthfulness of the parties, yet in a trial conducted via  
13 Blue Jeans, the Court will not be able to accurately determine the credibility of the  
14 witnesses as the Court will not be able to read the body language of each witness, or  
15 to ensure that each witness is not reading notes, looking at their phone or another  
16 computer screen, or being coached, or whether another witness is present during  
17 testimony to hear what is being testified to prior to providing their own testimony.  
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20 The bulk of the evidence in this case is being provided by way of audio and  
21 video recordings, which will be impossible to accurately share for viewing by the  
22 Court, the witness, and both counsel simultaneously, to ensure accurate review of  
23 the evidence and related evidence. The accusations by both parties are serious –  
24 Defendant alleges a history of domestic violence and neglect by Plaintiff, while  
25 Plaintiff alleges sexual abuse of one of the minor children as well as prescription  
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1 drug abuse by Defendant. The parties went to the expense of a full Custodial  
2 Evaluation performed by Dr. Paglini, a large part of which was the audio and video  
3 recordings related to the domestic violence, which will be utilized during his  
4 testimony. As the Court is aware, his recommendations ultimately were driven by  
5 Plaintiff's history of domestic violence, as well as Plaintiff's reaction when  
6 presented with the audio and video recordings in question.  
7  
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9 In addition to the above, as this Court is aware, there is absolutely no trust  
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 in prior Blue Jeans appearances, and undersigned counsel is confident that,  
14 regardless of the outcome of the trial in this case, the non-prevailing party will  
15 likely file an Appeal based on any number of concerns, including, but not limited  
16 to, potential witness tampering and the Court or witnesses not being able to  
17 accurately view the evidence during questioning.  
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20 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  
22 further provides guidelines to follow in the case that a personal meeting is  
23 necessary. Specifically, all those involved must abide by social distances, and wear  
24 face coverings over their noses and mouths. As the Court is aware, the courtroom is  
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1 sufficiently big enough for the parties to social distance among themselves and  
2 from the Court, and all individuals involved can wear face coverings. If the Court  
3 has specific concerns related to the health of Judge Gentile, Defendant would  
4 request that the trial be conducted by another Family Court Judge, as there are  
5 numerous judges conducting in person trials and hearings with social distancing  
6 protocols in place.  
7

8  
9 The parties to this case have been litigating custody issues for almost two (2)  
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 allegations about domestic violence, sexual abuse, and drug use, and it is crucial for  
14 the witnesses to be able to consider the audio and video evidence at the time of  
15 questioning. Further, it is crucial that the Court have the best ability to determine  
16 the credibility of the witnesses, especially the parties, without any concern for  
17 witness tampering, witness coaching, or other inappropriate actions by witnesses.  
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21 The Court must note that, in all other circumstances, parties must follow  
22 specific procedures if they wish to not appear in person at a trial. Even a party  
23 wishing for *child* to testify by alternative means must file a specific Motion  
24 requesting the same. The fact that the Nevada Revised Statutes presume that even  
25 children, who inarguably should not be subjected to litigation related to their own  
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1 custody, must testify in person except in certain circumstances, highlights the  
2 importance of a trial being conducted with all testimony being taken in person.

3  
4 As such, Amanda respectfully requests a finding under AO 20-17 that a  
5 personal appearance by all parties and witnesses is necessary to conduct the  
6 proceeding, and, as such, allow for an in-person trial.

7  
8 **B. The action should be stayed.**

9 As outlined in detail below, this Court should stay this action. Pursuant to  
10 NRAP 8(d),<sup>1</sup> the Court must consider the following factors when determining  
11 whether to issue a stay in a civil case involving child custody:  
12

- 13 1. Whether the children will suffer hardship or harm if the stay is either  
14 granted or denied:

15 If the stay is denied, there is a high likelihood that the case will ultimately  
16 result in an appeal following the trial in this matter. Should that happen, the parties  
17 will still not have finality and the children will still be subject to the high conflict  
18 that ongoing litigation creates.  
19

- 20 2. Whether the nonmoving party will suffer hardship or harm if the stay  
21 is granted:

22 Plaintiff will suffer no hardship. He continues to enjoy joint physical  
23 custody, and is currently afforded all weekends with the minor children. Further,  
24 pending trial, his child support obligation has been stayed.  
25

- 26 3. Whether movant is likely to prevail on the merits in the appeal:

27 <sup>1</sup> There is no standard *per se* for a stay in the district court pending appeal. Defendant  
28 submits that the factors in the Nevada Rules of Appellate Procedure should be used in this Court.

1 Defendant believes she will prevail on the merits of a Writ related to whether  
2 the parties are entitled to an in-person trial.

3  
4 4. Whether a determination of other existing equitable consideration, if  
5 any, is warranted.

6 This factor is not relevant.

7 As such, Amanda respectfully requests that, should the Court not see fit to  
8 grant her Motion for In-Person Trial, the trial on this matter be stayed until such  
9 time as a Petition for Writ on the same issue may be decided.  
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**III.**

**Conclusion**

Therefore, based upon the foregoing, Amanda respectfully requests this court  
to enter an order:

1. For trial to be conducted in-person;
2. For the action to be stayed;
3. For such other and further relief as the Court deems just and proper.

DATED this 23<sup>rd</sup> day of September, 2020.

**HANRATTY LAW GROUP**



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

Attorneys for Defendant, Amanda Reed

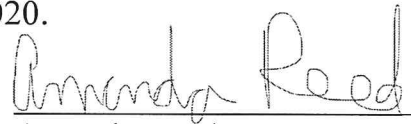
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DECLARATION OF AMANDA REED

STATE OF NEVADA    )  
                                  )ss:  
County of Clark        )

I, Amanda Reed, am the Defendant in the above referenced matter and have read the foregoing Motion, and the factual averments it contains are true and correct to the best of my knowledge, except as to those matters based on information and belief, and as to those matters, I believe them to be true. Those factual averments contained in the referenced filing are incorporated herein as if set forth in full.

Dated this 24<sup>th</sup> day of September, 2020.

  
\_\_\_\_\_  
Amanda Reed

MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

DEVIN REED  
Plaintiff/Petitioner

v.

AMANDA REED  
Defendant/Respondent

Case No. D-18-568055-D

Dept. F

**MOTION/OPPOSITION  
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**Step 1.** Select either the \$25 or \$0 filing fee in the box below.

- ☒ **\$25** The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.  
-OR-  
☐ **\$0** The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
- ☐ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
  - ☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
  - ☐ The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on \_\_\_\_\_.
  - ☐ Other Excluded Motion (must specify) \_\_\_\_\_.

**Step 2.** Select the \$0, \$129 or \$57 filing fee in the box below.

- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
- ☒ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
  - ☐ The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
- OR-  
☐ **\$129** The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.  
-OR-  
☐ **\$57** The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

**Step 3.** Add the filing fees from Step 1 and Step 2.

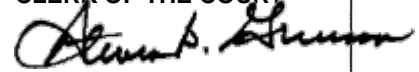
The total filing fee for the motion/opposition I am filing with this form is:

☐\$0 ☒\$25 ☐\$57 ☐\$82 ☐\$129 ☐\$154

Party filing Motion/Opposition: Defendant Date 9/23/20

Signature of Party or Preparer Kari Colli

APPX1105



CSERV  
HANRATTY LAW GROUP  
Kari J. Hanratty, Esq.  
State Bar of Nevada No. 7677  
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**  
**FAMILY DIVISION**  
**CLARK COUNTY, NEVADA**

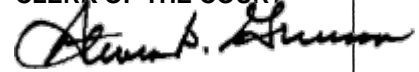
DEVIN REED,	)	Case No: D-18-568055-D
	)	Dept No: F
Plaintiff,	)	
	)	
v.	)	<b>CERTIFICATE OF ELECTRONIC</b>
	)	<b>SERVICE</b>
AMANDA REED,	)	
	)	
Defendant.	)	

I hereby certify that I am an employee of Hanratty Law Group, and on the 24<sup>th</sup> day of September, 2020, I served a true and correct copy of the *Notice of Motion and Amended Motion for In-Person Trial and to Stay Action* by using the Wiz-Net E-Service addressed to the following email registered on the E-Service List for this case as follows:

Alex Ghibaud, Esq.  
Michancy Cramer, Esq.  
alex@glawvegas.com  
michancy@glawvegas.com  
office@glawvegas.com  
*Attorney for Plaintiff*

By:   
Employee of Hanratty Law Group





CSERV  
HANRATTY LAW GROUP  
Kari J. Hanratty, Esq.  
State Bar of Nevada No. 7677  
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Las Vegas, Nevada 89134  
PH: (702) 821-1379  
FAX: (702) 870-1846  
EMAIL: attorneys@hanrattylawgroup.com  
Attorneys for Defendant, Amanda Reed

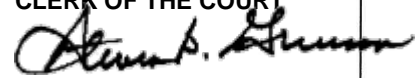
**DISTRICT COURT**  
**FAMILY DIVISION**  
**CLARK COUNTY, NEVADA**

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

I hereby certify that I am an employee of Hanratty Law Group, and on the 28<sup>th</sup> day of September, 2020, I served a true and correct copy of the *Re-Notice of Motion* 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.  
Michancy Cramer, Esq.  
alex@glawvegas.com  
michancy@glawvegas.com  
office@glawvegas.com  
*Attorney for Plaintiff*

By:   
Employee of Hanratty Law Group




1 CSERV  
2 HANRATTY LAW GROUP  
3 Kari J. Hanratty, Esq.  
4 State Bar of Nevada No. 7677  
5 1815 Village Center Circle, Suite 140  
6 Las Vegas, Nevada 89134  
7 PH: (702) 821-1379  
8 FAX: (702) 870-1846  
9 EMAIL: attorneys@hanrattylawgroup.com  
10 Attorneys for Defendant, Amanda Reed

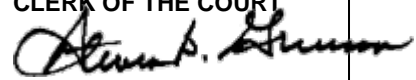
8 DISTRICT COURT  
9 FAMILY DIVISION  
10 CLARK COUNTY, NEVADA

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

16  
17 I hereby certify that I am an employee of Hanratty Law Group, and on the 23<sup>rd</sup> day of  
18 September, 2020, I served a true and correct copy of the *Notice of Motion and Motion for In-*  
19 *Person Trial and to Stay Action* by using the Wiz-Net E-Service addressed to the following email  
20 registered on the E-Service List for this case as follows:

21 Alex Ghibaud, Esq.  
22 Michancy Cramer, Esq.  
23 alex@glawvegas.com  
24 michancy@glawvegas.com  
25 office@glawvegas.com  
26 *Attorney for Plaintiff*

25 By:   
26 Employee of Hanratty Law Group



**RMOT**  
**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>RE-NOTICE OF MOTION</b>
	)	
AMANDA REED,	)	Oral Argument Requested: YES
	)	
Defendant.	)	

TO: Plaintiff, Devin Reed, and his attorney, Alex B. Ghibaud, Esq. & Michancy M. Cramer, Esq.

PLEASE TAKE NOTICE that the *Motion for In-Person Trial and to Stay Action* and *Amended Motion for In-Person Trial and to Stay Action* will come on for a hearing before the Honorable Denise L. Gentile in Dept. "F", Courtroom #3, of the above entitled Court, located at 601 N. Pecos Road, Las Vegas, Nevada 89101, on the \_\_\_\_ day of \_\_\_\_\_, 2020, at \_\_\_\_\_ a.m./p.m.

Dated this 28<sup>th</sup> day of September, 2020.

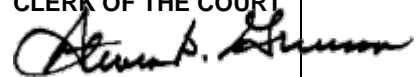
**HANRATTY LAW GROUP**

By:   
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  
Attorneys for Defendant, Amanda Reed

DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*

Electronically Filed  
9/29/2020 10:25 AM  
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 for In-Person Trial and to Stay Action in the above-entitled matter is set for hearing as follows:

**Date:** November 18, 2020

**Time:** 2:00 PM

**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

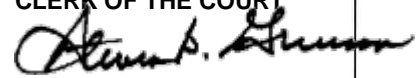
By: /s/ Juanito Nasarro  
Deputy Clerk of the Court

**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

APPX1110



1 **NEOJ**  
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 PH: (702) 821-1379  
8 FAX: (702) 870-1846  
9 EMAIL: attorneys@hanrattylawgroup.com  
10 Attorneys for Defendant, Amanda Reed

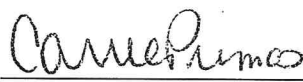
7 **DISTRICT COURT**  
8 **CLARK COUNTY, NEVADA**

9 DEVIN REED,	)	Case No: D-18-568055-D
	)	Dept No: F
10 Plaintiff,	)	
	)	
11 v.	)	<b>NOTICE OF ENTRY OF ORDER</b>
	)	
12 AMANDA REED,	)	
	)	
13 Defendant.	)	

14  
15 Please take notice that a *Stipulation and Order to Continue Trial* was duly entered in the  
16 above referenced case on the 1<sup>st</sup> day of October, 2020, a copy of which is attached hereto and by  
17 reference fully incorporated herein.

18 Dated this 1<sup>st</sup> day of October, 2020.

19 **HANRATTY LAW GROUP**

20  
21 By:   
22 Carrie J. Primas, Esq.  
23 State Bar of Nevada No. 12071  
24 1815 Village Center Circle, Suite 140  
25 Las Vegas, Nevada 89134  
26 PH: (702) 821-1379  
27 FAX: (702) 870-1846  
28 EMAIL: attorneys@hanrattylawgroup.com  
Attorneys 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 1<sup>st</sup> day of October, 2020, I served a true and correct copy of the *Notice of Entry of Order* (with Order attached hereto) by using the Wiz-Net E-Service addressed to the following email registered on the E-Service List for this case as follows:

Alex Ghibaud, Esq.  
Michancy Cramer, Esq.  
alex@glawvegas.com  
michancy@glawvegas.com  
office@glawvegas.com  
*Attorney for Plaintiff*

By: Kari Colli  
Employee of Hanratty Law Group

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 **CLARK COUNTY, NEVADA**

10 DEVIN REED, ) Case No: D-18-568055-D  
11 ) Dept No: F  
12 Plaintiff, )  
13 )  
14 v. ) **STIPULATION AND ORDER TO**  
15 ) **CONTINUE TRIAL**  
16 AMANDA REED, )  
17 )  
18 Defendant. )

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

23 IT IS HEREBY STIPULATED AND AGREED AND THEREFORE ORDERED that the  
24 Trial scheduled for October 22, 2020, at 9:00 a.m., shall be continued for at least thirty (30) days  
25 to allow Defendant's Motion for an in-person trial to be heard and ruled on by this Court.

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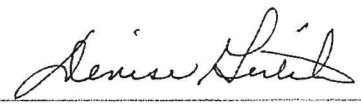


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IT IS HEREBY STIPULATED AND AGREED AND THEREFORE ORDERED that the

Trial shall be continued to January 28, 2021 at at 9 a.m./p.m.

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_ ~~Dated this 2020~~ 1st day of October, 2020



District Court Judge

**EAB 1F2 CC8B 6A7A**

**Denise L. Gentile**

**District Court Judge**

Dated this 21st day of September, 2020.

Dated this 21 day of September, 2020.

**HANRATTY LAW GROUP**

**ALEX GHILBAUDO, PC**

By: 

By: 

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

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