

1 **CSERV**

2  
3 DISTRICT COURT  
CLARK COUNTY, NEVADA

4 Electronically Filed  
5 Jan 10 2022 11:28 p.m.  
Elizabeth A. Brown  
6 Clerk of Supreme Court

7 Devin Bryson Reed, Plaintiff

CASE NO: D-18-568055-D

8 vs.

DEPT. NO. Department F

9 Amanda Raelene Reed,  
10 Defendant.

11 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 10/1/2020

15 KC Collis kcollis@hanrattylawgroup.com

16 Carrie Primas cprimas@hanrattylawgroup.com

17 Main HLG attorneys@hanrattylawgroup.com

18 Louis Schneider lcsllawllc@gmail.com

19 Alex Ghibaudo alex@glawvegas.com

20 Michancy Cramer michancy@glawvegas.com  
21  
22  
23  
24  
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*Hanratty Law Group*  
CLERK OF THE COURT

1 **SAO**  
2 **HANRATTY LAW GROUP**  
3 Carrie J. Primas, Esq.  
4 State Bar of Nevada No. 12071  
5 1815 Village Center Circle, Suite 140  
6 Las Vegas, Nevada 89134  
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 v. ) **STIPULATION AND ORDER TO**  
14 ) **CONTINUE TRIAL**  
15 AMANDA REED, )  
16 )  
17 Defendant. )

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

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

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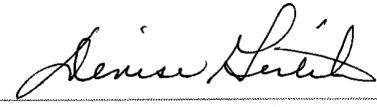
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IT IS HEREBY STIPULATED AND AGREED AND THEREFORE ORDERED that the  
Trial shall be continued to January 28, 2021 at at 9 a.m./p.m.

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_ ~~Dated this 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 GHIBAUDO, PC**

By: Carrie Primas  
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

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

1 **CSERV**

2  
3 DISTRICT COURT  
CLARK COUNTY, NEVADA

4  
5  
6 Devin Bryson Reed, Plaintiff

CASE NO: D-18-568055-D

7 vs.

DEPT. NO. Department F

8 Amanda Raelene Reed,  
9 Defendant.

10  
11 **AUTOMATED CERTIFICATE OF SERVICE**

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15 KC Collis

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16 Carrie Primas

cprimas@hanrattylawgroup.com

17 Main HLG

attorneys@hanrattylawgroup.com

18 Louis Schneider

lcsllawllc@gmail.com

19 Alex Ghibaudo

alex@glawvegas.com

20 Michancy Cramer

michancy@glawvegas.com

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APPX1118

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint****COURT MINUTES**

November 18, 2020

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

**November 18, 2020      2:00 PM      Motion**

**HEARD BY:** Gentile, Denise L**COURTROOM:** Courtroom 03**COURT CLERK:** Melissa McCulloch**PARTIES:**

Abby Reed, Subject Minor, not present  
Amanda Reed, Defendant, Counter Claimant, not present  
Carrie Primas, Attorney, not present  
Devin Reed, Plaintiff, Counter Defendant, not present  
Alex Ghibaudo, Attorney, not present  
Shawn Reed, Subject Minor, not present

<b>JOURNAL ENTRIES</b>
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- MINUTE ORDER ISSUED -- NO HEARING HELD

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 Administrative Order 20-17, this Court may issue a decision on the papers.

This matter was set for hearing on November 18, 2020 on Defendant s Motion for an In-Person trial and to Stay Action. COURT FINDS that Defendant seeks for this Court to grant an In-Person trial rather than to conduct the trial via bluejeans video conference. The trial is presently set for January 28, 2021, via bluejeans video conference. COURT FINDS that at this juncture, the Court is not inclined to grant such a request for an in-person trial, given that the current administrative orders are

PRINT DATE:	12/02/2020	Page 1 of 2	Minutes Date:	November 18, 2020
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

APPX1119

become more restrictive, requiring all parties present to wear masks at all times, to social distance, directs the Court to minimize the number of people in the Courthouse, and to the extent possible that the judges and staff work remotely. COURT FURTHER FINDS that the Courtroom appearances are restricted to only a few people in the courtroom; the parties and their counsel must sit 6 feet apart, minimum, and everyone must wear a mask at all times; these guidelines will be strictly adhered to by this Court. COURT DIRECTS that the parties will have to adapt to the Court's requirement for video appearance for this trial, until further notice from this Court.

In the event the parties do not want to proceed, and seek for the action to be stayed pending an in-person trial, the parties may submit a stipulation to the Court for its review, with timelines setting forth the period in which the parties seek to stay the action. This stipulation is subject to the Court's review and approval.

Otherwise, the trial date STANDS.

CLERK'S NOTE: On 11/24/20 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. (mm)

**FUTURE HEARINGS:** January 28, 2021 9:00 AM Non-Jury Trial  
Gentile, Denise L  
Courtroom 03  
McCulloch, Melissa

PRINT DATE:	12/02/2020	Page 2 of 2	Minutes Date:	November 18, 2020
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**Notice:** Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

APPX1120

*Amanda S. Hinn*  
CLERK OF THE COURT

**ORDR**

**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

) **ORDER AFTER NOVEMBER 18, 2020,**  
) **MINUTE ORDER**

) Date of Hearing: November 18, 2020

This matter being set before this Court on the 18<sup>th</sup> day of November, 2020, for Defendant's Motion for an In-Person Trial and to Stay Action, and a decision being made on the papers pursuant to Administrative Order 20-17, the Court hereby finds and orders as follows:

THE COURT HEREBY FINDS that Defendant seeks for this Court to grant an in-person trial rather than to conduct the trial via Bluejeans video conference.

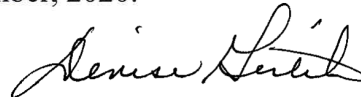
THE COURT FURTHER FINDS that at this juncture, the Court is not inclined to grant such a request for an in-person trial.

\\ As of the date of this Order, THE COURT FURTHER FINDS that given the state of the Administrative Orders AO-17 and AO-24, and in an attempt by the Court to protect the public from the pandemic, the current requirement is that bench trials shall be conducted, by alternative means unless the District Court Judge finds that 1) a personal appearance is necessary to conduct the proceedings and 2) that extraordinary circumstances exist that require personal appearance. COURT DOES NOT FIND that the two prongs are met in this case, at the present time. COURT FINDS that these requirements are in effect until January 11, 2021, unless extended by future Administrative Orders. If not extended, and AO-17 is reinstated the it is the District Court Judge's discretion to determine whether the matter will proceed by the recommended method of alternative means - via vided conference or whether there is a basis to conduct the trial in person,

APPX1121

1 IT IS HEREBY ORDERED that Defendant's Motion is denied and the trial set for  
2 January 28, 2021, via Bluejeans video conference, stands.

3 IT IS SO ORDERED on this \_\_\_\_\_ day of December, 2020. <sup>Dated this 8th day of December, 2020</sup>

4 


5  
6 District Judge  
87B 6CA EB66 CD35  
Denise L. Gentile  
District Court Judge

7 Respectfully submitted on this 8<sup>th</sup>  
8 day of December, 2020.

Approved as to form and content on this 2<sup>nd</sup>  
day of December, 2020.

9 HANRATTY LAW GROUP

ALEX GHIBAUDO, PC

10  
11 By:   
12 Carrie J. Primas, Esq.  
13 Nevada Bar No. 12071  
14 1815 Village Center Circle, Suite 140  
15 Las Vegas, Nevada 89134  
16 Phone: (702) 821-1379  
17 Fax: (702) 870-1846  
18 Email: attorneys@hanrattylawgroup.com  
19 Attorney for Defendant, Amanda Reed

By: /s/ Michancy M. Cramer  
Michancy 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

## KC Collis

---

**From:** Michancy Cramer <michancy@glawvegas.com>  
**Sent:** Wednesday, December 2, 2020 4:19 PM  
**To:** KC Collis  
**Cc:** Carrie Primas; Alex Ghibaud  
**Subject:** RE: Reed v. Reed

Hi – you can affix my electronic signature per the Admin Orders.

Regards,

M

**From:** KC Collis <kcollis@hanrattylawgroup.com>  
**Sent:** Wednesday, December 2, 2020 3:36 PM  
**To:** Michancy Cramer <michancy@glawvegas.com>  
**Cc:** Carrie Primas <cprimas@hanrattylawgroup.com>; Alex Ghibaud <alex@glawvegas.com>  
**Subject:** Reed v. Reed

Ms. Cramer,

Attached is the proposed Order from the November 18<sup>th</sup> Minute Order. If said Order meets with your approval, please sign and return same to our office. Should you have any proposed revisions, please advise our office of same.

Thank you,

**KC Collis**

Paralegal

Hanratty Law Group  
1815 Village Center Circle  
Suite 140  
Las Vegas, Nevada 89134  
Phone: (702) 821-1379  
Fax: (702) 870-1846  
Website: [www.hanrattylawgroup.com](http://www.hanrattylawgroup.com)  
Email: [kcollis@hanrattylawgroup.com](mailto:kcollis@hanrattylawgroup.com)

The contents of this electronic mail message are confidential in nature and intended solely for the individual as addressed. Should you receive this electronic mail message in error, please delete this electronic mail message and/or contact the Hanratty Law Group immediately at the number listed above.

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**

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13 Court. The foregoing Order was served via the court's electronic eFile system to all  
recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 12/8/2020

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kcollis@hanrattylawgroup.com

16 Carrie Primas

cprimas@hanrattylawgroup.com

17 Main HLG

attorneys@hanrattylawgroup.com

18 Louis Schneider

lcsllawllc@gmail.com

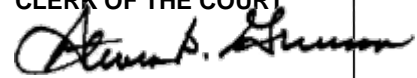
19 Alex Ghibaudo

alex@glawvegas.com

20 Michancy Cramer

michancy@glawvegas.com

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28 APPX1124



NEOJ  
HANRATTY LAW GROUP  
Carrie J. Primas, Esq.  
State Bar of Nevada No. 12071  
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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

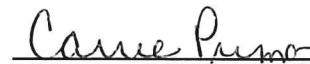
**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

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

Please take notice that a *Stipulation and Order for Release of CPS Records* was duly entered in the above referenced case on the 23<sup>rd</sup> day of January, 2020, a copy of which is attached hereto and by reference fully incorporated herein.

Dated this 27<sup>th</sup> day of January, 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

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**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that I am an employee of Hanratty Law Group, and on the 27<sup>th</sup> day of January, 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:

Louis C. Schneider, Esq.  
lcsllawllc@gmail.com  
*Attorney for Plaintiff*

By: Kari Collis  
Employee of Hanratty Law Group

*Steven D. Grierson*

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

11  
12 **DISTRICT COURT**  
13 **CLARK COUNTY, NEVADA**

14 DEVIN REED, ) Case No: D-18-568055-D  
15 ) Dept No: F  
16 Plaintiff, )  
17 )  
18 v. ) **STIPULATION AND ORDER FOR**  
19 ) **RELEASE OF CPS RECORDS**  
20 AMANDA REED, )  
21 )  
22 Defendant. )

23 COMES NOW Plaintiff, Devin Reed, by and through his attorney, Louis C. Schneider,  
24 Esq., of the Law Offices of Louis C. Schneider, LLC, and Defendant, Amanda Reed, by and  
25 through her attorney, Carrie J. Primas, Esq., of Hanratty Law Group, and hereby stipulate and  
26 agree as follows:

27 IT IS HEREBY STIPULATED AND AGREED that, given the parties' stipulation for Dr.  
28 John Paglini to perform a child custody evaluation with psychological testing, Dr. Paglini should  
be provided with any and all information he feels is necessary and appropriate to complete such  
evaluation;

IT IS FURTHER STIPULATED AND AGREED that it is necessary and appropriate to  
release the CPS records involving the minor children at issue to Dr. John Paglini based on Dr.  
Paglini's request for the same to allow him prepare the most comprehensive child custody

1 evaluation possible;

2 IT IS FURTHER STIPULATED AND AGREED that the CPS records involving the  
3 minor children at issue shall be released to Dr. John Paglini for his review during the child  
4 custody evaluation.

5 Dated this 21<sup>st</sup> day of January, 2020.

Dated this 21 day of January, 2020.

6 HANRATTY LAW GROUP

7 LAW OFFICE OF LOUIS C.  
8 SCHNEIDER, LLC

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

By: Louis C. Schneider  
Louis C. Schneider, Esq.  
Nevada Bar No. 9683  
430 South 7<sup>th</sup> Street  
Las Vegas, Nevada 89101  
Phone: (702) 435-2121  
Fax: (702) 431-3807  
Email: lcsllawllc@yahoo.com  
Attorney for Plaintiff, Devin Reed

18 Court finds that the release of said  
19 CPS records to Dr. Paglini is warranted  
20 to assist the Court in resolving a substantive  
21 issue in the above-referenced case, as he is  
22 performing a custody evaluation in which  
23 the information in the CPS records may be  
24 pertinent for the investigation and final recommendation  
25 to the Court. This finding is made as  
26 required by NRS 432B.290(3).

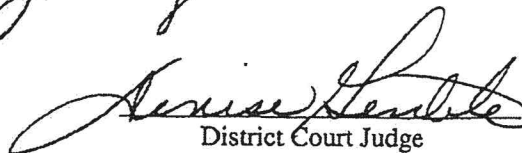
27 Court orders that Dr. Paglini shall maintain  
28 said records in his confidential file and shall  
not release to the parties, or any other individual.

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**ORDER**

IT IS HEREBY ORDERED that the CPS records involving the minor child at issue shall be released to Dr. John Paglini. *(according to the terms set forth above)*

IT IS SO ORDERED on this 23<sup>rd</sup> day of January, 2020.

  
District Court Judge

DENISE L. GENTILE

Respectfully submitted this  
21<sup>st</sup> day of January, 2020.

Carrie Primas  
Carrie J. Primas, Esq.  
State Bar of Nevada 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

CLERK OF THE COURT

\* \* \* \*

DEVIN BRYSON REED, PLAINTIFF  
VS.  
AMANDA RAELENE REED,  
DEFENDANT.

CASE NO.: D-18-568055-D  
DEPARTMENT Z

**NOTICE OF DEPARTMENT REASSIGNMENT**

NOTICE IS HEREBY GIVEN that the above-entitled action has been randomly  
reassigned to Judge Shell Mercer.

☒ This reassignment follows the filing of Peremptory Challenge of Judge AMY M  
MASTIN.

☐ This reassignment is due to the recusal of Judge SHELL MERCER. See minutes in  
file.

☐ This reassignment is due to:

ANY TRIAL DATE IS VACATED AND WILL BE RESET BY THE NEW  
DEPARTMENT.

Any motions or hearings presently scheduled in the FORMER department will be  
heard by the NEW department. You will be notified when the Non-Jury Trial is  
rescheduled by the department.

PLEASE INCLUDE THE NEW DEPARTMENT NUMBER ON ALL FUTURE  
FILINGS.

STEVEN D. GRIERSON, CEO/Clerk of the Court

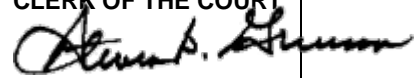
By: /s/ Pamela Woolery  
Deputy Clerk of the Court

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☐ I mailed, via first-class mail, postage fully prepaid, the foregoing Clerk's Notice Department of Reassignment to:

Alex Ghibaudo  
Carrie J. Primas, ESQ  
Harvey Gruber

/s/ Pamela Woolery  
Deputy Clerk of the Court



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\*\*\*\*

**DEVIN BRYSON REED,  
PLAINTIFF  
VS.  
AMANDA RAELENE REED,  
DEFENDANT.**

**CASE NO: D-18-568055-D  
  
DEPARTMENT Z**

**NOTICE OF RESCHEDULING OF TRIAL &  
NOTICE OF AUDIO/VISUAL APPEARANCE**

Please be advised that the date and time of a hearing set before  
the **Honorable SHELL MERCER** has been changed. The **Non-Jury  
Trial**, presently scheduled for **January 28**, has been rescheduled to  
the **25th day of February, 2021, at 9:00 AM, Courtroom 22.**

**(Appearances by Bluejeans)**

**District Judge SHELL MERCER**

By: /s/ Esther Renteria  
Esther Renteria  
Judicial Executive Assistant  
Department Z

APPX1132

**CERTIFICATE OF SERVICE**

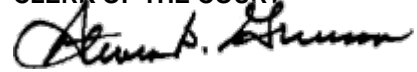
I hereby certify that on the above file stamp date:

XX I have e-served pursuant to NEFCR 9 and/or mailed, via first-class mail, postage fully prepaid the foregoing NOTICE to:

Alex Ghibaud, Esq.  
[alex@glawvegas.com](mailto:alex@glawvegas.com)

Carrie J. Primas, Esq.  
[attorneys@hanrattylawgroup.com](mailto:attorneys@hanrattylawgroup.com)

/s/ Esther Renteria  
Esther Renteria  
Judicial Executive Assistant  
Department Z



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\*\*\*\*

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

**NOTICE OF HEARING &  
NOTICE OF AUDIO/VISUAL APPEARANCE**

**TO: Devin Bryson Reed; Alex Ghibaud, Esq.; Amanda  
Raelene Reed; and Carrie J. Primas, Esq**

Please be advised that the above-entitled matter has been  
scheduled for **Calendar Call** to be heard by the Honorable Shell Mercer  
at the Family Courts and Services Center, 601 N. Pecos Rd., Las  
Vegas, Nevada, on the **17th day of February, 2021** at the hour of **1:30  
PM** in **Department Z, Courtroom 22. (Appearances by video or  
phone on Bluejeans)**

**District Judge SHELL MERCER**

By: /s/ Esther Renteria  
Esther Renteria  
Judicial Executive Assistant  
Department Z

APPX1134

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## CERTIFICATE OF SERVICE

I hereby certify that on the above file stamp date:

☒ I have e-served pursuant to NEFCR 9 and/or mailed, via first-class mail, postage fully prepaid the foregoing NOTICE to:

Alex Ghibaud, Esq.  
[alex@glawvegas.com](mailto:alex@glawvegas.com)

Carrie J. Primas, Esq.  
[attorneys@hanrattylawgroup.com](mailto:attorneys@hanrattylawgroup.com)

/s/ Esther Renteria  
Esther Renteria  
Judicial Executive Assistant  
Department Z

## Divorce - Complaint

## COURT MINUTES

February 17, 2021

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

February 17, 2021      01:30 PM      Calendar Call

HEARD BY: Mercer, Shell

COURTROOM: Courtroom 22

COURT CLERK: Madrigal, Blanca

## 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

Jason Naimi, Attorney, Present

Abby Reed, Subject Minor, Not Present

Harvey Gruber, Attorney, Not Present

Shawn Reed, Subject Minor, Not Present

## JOURNAL ENTRIES

## CALENDAR CALL

Attorney Jason Naimi, Nevada Bar No. 9441, present on behalf of the Defendant and with Ms. Primas.

All parties present via the BlueJeans Application.

Both counsels noted they were ready for trial and the Pretrial Memorandums would be filed no later than Thursday, 2/18/2021.

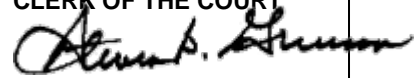
## COURT ORDERED,

- 1) The Trial Date scheduled on 2/25/2021 at 9:00 a.m., shall STAND;
- 2) Counsels shall exchange and provide the Court with hard copies of exhibits no later than Monday, 2/22/2021;
- 3) Counsels to confer and determine if they will be present in person at time of trial or if trial will be held via BlueJeans.

## INTERIM CONDITIONS:

## FUTURE HEARINGS:

Feb 25, 2021 9:00AM Non-Jury Trial  
Courtroom 22 Mercer, Shell



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

DEVIN REED,	)	Case No: D-18-568055-D
	)	Dept No: Z
Plaintiff,	)	
	)	
v.	)	<b>DEFENDANT'S PRE-TRIAL</b>
	)	<b>MEMORANDUM</b>
AMANDA REED,	)	
	)	
Defendant.	)	

COMES NOW Defendant, Amanda Reed, by and through her attorney of record, Carrie J. Primas, Esq., of Hanratty Law Group and hereby submits this Pre-Trial Memorandum.

DATED this 18<sup>th</sup> day of February, 2021.

**HANRATTY LAW GROUP**

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1 I.

2 **STATEMENT OF ESSENTIAL FACTS**

3 **A. NAMES/AGES OF PARTIES:**

4 Plaintiff: Devin Reed, age 47 years;  
5 Defendant: Amanda Reed, age 36 years.

6 **B. DATE/PLACE OF MARRIAGE/DIVORCE:**

7 The Parties, Plaintiff Devin Reed (“Devin”) and Defendant Amanda Reed (“Amanda”)  
8 were divorced pursuant to a Decree of Divorce on the 6<sup>th</sup> day of April, 2020. There are two minor  
9 children born the issue of the marriage, to wit: Abigail Reed (“Abby”), born April 6, 2013; and  
10 Shawn Reed (“Shawn”), born July 3, 2015.

11 **C. RESOLVED ISSUES INCLUDING AGREED RESOLUTION:**

12 1. None.

13 **D. STATEMENT OF UNRESOLVED ISSUES:**

- 14 1. Modification of Custody;  
15 2. Modification of Child Support;  
16 3. Contempt;  
17 4. Attorney Fees.

18 II.

19 **MODIFICATION OF CUSTODY**

20 Where joint legal and physical custody has previously been awarded to the parties, the  
21 party seeking the modification must prove by a preponderance of the evidence that the best  
22 interests of the child would be served by granting the requesting party primary or sole physical  
23 custody. *Truax v. Truax*, 110 Nev. 437 (1994). Because the principals of res judicata still apply,  
24 *Truax* does not provide litigants with the ability to re-litigate the issues based on the same set of  
25 facts or circumstances. However, the Nevada Supreme Court has held in *Castle v. Simmons*, 86  
26 P.3d 1042 (2004), that “a party seeking to change custody may introduce evidence of domestic  
27 violence if he or she or the district court was unaware of the existence or extent of the  
28

1 **conduct when the prior custody order was entered.”** *Id.* at 1044, emphasis added.

2 Pursuant to NRS 125C.230(1), where a court has found by clear and convincing evidence  
3 that either parent or any other person seeking custody of a child has engaged in one or more acts  
4 of domestic violence against the child, a parent of the child or any other person residing with the  
5 child, there arises a rebuttable presumption that sole or joint custody of the child by the  
6 perpetrator of the domestic violence is not in the best interest of the child. Moreover, in all cases  
7 where the Court must determine physical custody of a minor child, the sole consideration of the  
8 Court must be the best interest of the child, which is determined by considering the statutory  
9 provisions of NRS 125C.0035(4) to determine whether modification serves the child’s best  
10 interest.  
11

12 Devin engaged in numerous acts of domestic violence against Amanda during the parties’  
13 marriage, the extent of which was never presented to this Court, as Amanda was advised by her  
14 prior counsel that she should stipulate to joint physical custody despite the history of domestic  
15 violence. Amanda is prepared to present extensive evidence, including recordings, medical  
16 records, and statements from individuals to whom Amanda disclosed the domestic violence, to  
17 prove by clear and convincing evidence that the domestic violence did occur, and was often  
18 witnessed by the minor children.  
19

20 The domestic violence is confirmed in the child custody evaluation performed by Dr. John  
21 Paglini, who was designated as a joint expert on September 19, 2019. Dr. Paglini ultimately  
22 recommended that Amanda have sole legal custody and primary physical custody, and stated, “**I**  
23 **have serious concerns about Mr. Devin Reed.** Domestic Violence was evident in their  
24 relationship. Mr. Reed appeared abusive, threatened her with a gun and he was degrading.” *See*  
25 *Custody Evaluation at pg. 56. Emphasis Added.*  
26

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1 In addition to the rebuttable presumption that will arise when Amanda presents evidence  
2 of the domestic violence to the Court, Devin has shown an inability to properly care for the minor  
3 children. He fails to brush their teeth or bathe them; has repeatedly dropped them off at school in  
4 clothes that are dirty or noticeably too small; has transported the children without carseats; fails to  
5 engage them in remote learning during his custodial time, causing Amanda to have to play  
6 catchup during her custodial time; refuses to coparent with Amanda, insisting instead on  
7 harassing her and continuously violating Court orders; and forces the children to wake up at 3:00  
8 a.m. to accommodate his work schedule instead of allowing Amanda to keep the children for  
9 additional time.  
10

11 As Amanda will show at trial, an evaluation of the relevant best interest factors, outlined  
12 below, clearly shows that it is in the children's best interest that Amanda be awarded primary  
13 physical custody.

14 *(a) The wishes of the child if the child is of sufficient age and capacity to form an*  
15 *intelligent preference as to his or her custody.*

16 The minor children are only five (5) and seven (7) years old, and are not of sufficient age  
17 and capacity to form an intelligent preference as to their custody. However, the oldest child,  
18 Abby, has indicated to Amanda on numerous occasions that she is afraid of Devin, and becomes  
19 hysterical when she has to go with him for his custodial time. Recordings of several custodial  
20 exchanges show Abby refusing to go with Devin, and Devin standing by and doing nothing to  
21 help ease the transition. Abby has repeatedly told Amanda that she is afraid of Devin and that  
22 "daddy said" he was going to hit her when they get home; Abby has also reported to her therapist,  
23 Dr. Lisa Shaffer, that she is afraid of Devin as she has seen him hit Amanda.  
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1           (c) Which parent is more likely to allow the child to have frequent associations and a  
2           continuing relationship with the noncustodial parent.

3           Amanda has never withheld the minor children from Devin, despite his history of  
4           domestic violence, continued violations of the existing orders, and even instances of him picking  
5           up the minor children and driving away with them without child seats in his car. Amanda  
6           encourages Abby to go with Devin, even when the minor child is crying hysterically and clinging  
7           to her leg. Devin will allege that Amanda has withheld visitation, but Amanda will show at trial  
8           that Devin has refused his custodial time, specifically with Abby, when she refuses to go with  
9           him during exchanges. Devin also alleges that Amanda assisted in hiding Abby from him on one  
10          occasion when he tried to pick her up from Safekey; Devin alleges that Amanda was hiding the  
11          minor child in her classroom, and that is where Devin ultimately found her. Amanda will show,  
12          through testimony of a school employee who was directly involved with the incident, that  
13          Amanda was not at the school at the time of the incident and that Devin found the minor child  
14          hiding in the hallway.  
15

16          (d) The level of conflict between the parents.

17          The conflict between the parties is extremely high. Devin continues to mentally abuse and  
18          manipulate Amanda, using the children as pawns to get from her what he wants. Devin will  
19          refuse to take the children to extracurricular activities or otherwise comply with the Court's  
20          orders or agreements between the parties if he is upset with Amanda or perceives that she has  
21          somehow wronged him. Devin continues to send harassing and abusive messages to Amanda via  
22          text message and Our Family Wizard, and is extremely combative at custodial exchanges, which  
23          will be shown in the numerous recordings Amanda will present at trial. As recently as December  
24          25, 2020, during a custodial exchange, Devin alleged that Amanda's sister, who was sitting in her  
25          car across the parking lot, was "breaking the peace."  
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1           (e) *The ability of the parents to cooperate to meet the needs of the child.*

2           While the needs of the children are met during Amanda's custodial time, Devin fails to  
3 meet the children's needs and does not cooperate with Amanda in any way. The children do not  
4 brush their teeth during Devin's custodial time, causing an onslaught of cavities; used to arrive at  
5 school every single day in dirty, ill-fitting clothes, with food on their faces and not having been  
6 allowed to use the bathroom<sup>1</sup>; and do not participate in distance learning and have missing  
7 assignments during Devin's custodial time. During Devin's weekend custodial time, the children  
8 often do not bathe over the course of the three (3) days, and Abby often returns from Devin's  
9 house with pain and discomfort in her private area, creating a need for a pediatrician visit for  
10 treatment and to ensure no infection. Most recently, Devin is forcing the minor children to wake  
11 up at 3:00 a.m. during his custodial time so that his adult son, Daniel, can take him to work.  
12

13           Devin cannot even cooperate with Amanda to address issues of great concern.  
14 Specifically, in or around February 23, 2020, the parties learned that Abby had been molested by  
15 Jeff Eatherly, a friend of Amanda's. Amanda immediately called the police, CPS, and Abby's  
16 therapist; Devin did nothing to help Abby but repeatedly blame Amanda, and continuously throw  
17 the incident in her face. Mr. Eatherly was charged with Attempted Lewdness with a Child Under  
18 the age of 14 and Attempt to Use a Minor Under the Age of 14 as the Subject of Sexual Portrayal  
19 in a Performance. He pled guilty and was sentenced to seven (7) to twenty (20) years on both  
20 counts, to be served concurrently. Amanda attended every single hearing, made sure to keep in  
21 touch with the DA and victim advocate to stay apprised of every step of the process, and gave a  
22 victim impact statement on behalf of Abby at Mr. Eatherly's sentencing hearing. Not only did  
23 Devin not do a single thing to be involved in the process and ensure that justice was served for  
24 Abby, he repeatedly harassed Amanda, alleging that she was withholding information from him,  
25  
26  
27

28           <sup>1</sup> This was prior to distance learning when the children were attending school in person.

1 and using the assault and criminal proceedings as a reason to constantly contact Amanda, despite  
2 having the same contact information and same access to the relevant information as Amanda.

3 Devin has also created a false narrative as it relates to Amanda's father, Michael  
4 Spielberg, alleging that he creates conflict at custodial exchanges. As a result of these  
5 allegations, the Court entered a temporary Order at the May 13, 2020, hearing, that Mr. Spielberg  
6 not be present at the custodial exchanges. Devin's allegations in this regard is simply a further  
7 attempt to control Amanda; he is aware that she is afraid of him and will not conduct custodial  
8 exchanges alone, and is also aware that her father is the most reliable and accessible individual  
9 that Amanda has to accompany her to custodial exchanges. However, Devin cannot put his own  
10 hate for Amanda and her father aside for the best interest of the minor children, and must  
11 fabricate allegations so that he may control the entire situation.  
12

13 *(f) The mental and physical health of the parents.*

14 Amanda does not have any mental or physical health concerns. Dr. Paglini's report  
15 specifically states, at page 47, that Amanda has "no evidence of antisocial personality trait or  
16 sociopathy." Devin would have this Court believe that Amanda is a "pathogenic parent," but Dr.  
17 Paglini specifically noted no concerns with her parenting or ability to coparent.  
18

19 While Devin does not have any diagnosed mental health concerns, Dr. Paglini noted, on  
20 page 49 of his report, that Devin exhibits narcissistic personality traits and a history of domestic  
21 violence tendencies. He continues to engage in abusive behavior, violating this Court's orders,  
22 using the children as pawns, and acting contrary to their best interest. During the custody  
23 evaluation, even when presented with direct evidence of his domestic violence against Amanda,  
24 Devin refused to listen to the recordings and insisted that no domestic violence ever occurred.  
25 Whether he is simply lying or truly believes this to be the case, it is clear that he is in some way  
26 disconnected from reality.  
27  
28

1           (g) *The physical, developmental and emotional needs of the child.*

2           Neither of the children have any significant physical or developmental concerns.  
3 However, Abby and Shawn are only five (5) and seven (7) years old and still require significant  
4 care from a parent on a consistent basis. They require a parent to brush their teeth, bathe them,  
5 and ensure they have clean clothes. They require a parent to ensure they get to school on time and  
6 complete their homework, and in light of the current pandemic, require a parent to ensure they are  
7 engaged in their distance learning. These basic needs of the minor children are not met during  
8 Devin's custodial time, and Devin has shown that he is incapable of meeting them.  
9

10           Regarding their emotional needs, Abby, at only seven (7) years old, is already an  
11 extremely anxious child, who requires ongoing therapy to deal with the trauma she has already  
12 experienced in her childhood. As outlined in Dr. Paglini's report, this trauma is a result of the  
13 domestic violence committed against Amanda by Devin, and is so extensive that Dr. Paglini  
14 specifically recommended continued therapy for Abby, which the Court confirmed at the May 13,  
15 2020, hearing. Abby has been attending therapy since September, 2018.  
16

17           (h) *The nature of the relationship of the child with each parent.*

18           The children love both of their parents. However, as noted above, the children are afraid  
19 of Devin due to the domestic violence they have witnessed and the fact that Devin is quick to  
20 anger and threaten them for behavior that is common to children. They also complain to Amanda  
21 that he does not allow them to brush their teeth or bathe them when they are with him, and have  
22 recently begun complaining about having to get up in the middle of the night to take Devin to  
23 work. The children feel safe and cared for with Amanda, but are afraid of Devin and do not feel  
24 they can go to him for help.  
25

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