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Electronically Filed 06/17/2021 9:18 AM CLERK OF THE COURT

Robert Cerceo, Esq.
Nevada Bar No. 5247
Jason Naimi, Esq.
Nevada Bar No. 9441
Francesca Resch, Esq.
Nevada Bar No. 13011
Ilan Acherman, Esq.
Nevada Bar No. 12320
Carrie J. Primas, Esq.
Nevada Bar No. 12071
NAIMI & CERCEO
efile@naimicerceo.com
10000 W. Charleston Blvd., Suite 110
Las Vegas, Nevada 89135
Telephone: 702.901.4800
Facsimile: 702.463.0905
Attorneys for Defendant

Electronically Filed Jan 10 2022 11:37 p.m. Elizabeth A. Brown Clerk of Supreme Court

DISTRICT COURT, FAMILY DIVISION CLARK COUNTY, NEVADA

DEVIN REED,

CASE NO: D-18-568055-D

Plaintiff,

VS.

DEPT. NO.: Z

AMANDA REED,

Defendant.

STIPULATION AND ORDER REGARDING CHILD SUPPORT ARREARS AND CHILD SUPPORT

Plaintiff, DEVIN REED (hereinafter, "Father"), by and through his attorney, MICHANCY M. CRAMER, ESQ., of ALEX GHIBAUDO, PC, and Defendant, AMANDA REED (hereinafter, "Mother"), by and through her attorney, CARRIE J. PRIMAS, ESQ., of NAIMI & CERCEO, and hereby stipulate and agree to the following:

IT IS HEREBY STIPULATED AND AGREED that there shall be no child support arears owed by either party for the period May, 2020, through April, 2021.

IT IS FURTHER STIPULATED AND AGREED that effective May 1, 2021, Plaintiff shall pay child support to Defendant in the amount of \$350.00 per month. This child support amount is consistent with NAC 425.150 and Wright v. Osburn based on

APPX1269

CSERV 2 DISTRICT COURT 3 CLARK COUNTY, NEVADA 4 5 Devin Bryson Reed, Plaintiff CASE NO: D-18-568055-D 6 VS. DEPT. NO. Department Z 7 Amanda Raelene Reed, 8 Defendant. 9 10 **AUTOMATED CERTIFICATE OF SERVICE** 11 This automated certificate of service was generated by the Eighth Judicial District 12 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: 13 14 Service Date: 6/17/2021 15 e File efile@naimicerceo.com 16 Alex Ghibaudo alex@glawvegas.com 17 Michancy Cramer michancy@glawvegas.com 18 19 20 21 22 23 24 25 26 27 28

			6/18/2021 10:02 AM			
	1		Steven D. Grierson CLERK OF THE COURT			
	1	NTSO Robout Corose Fag	Otemp. Sum			
	2	Robert Cerceo, Esq. Nevada Bar No. 5247	Daniel.			
	3	Jason Naimi, Esq. Nevada Bar No. 9441				
	4	Carrie S. Primas, Esq. Nevada Bar No. 12070				
	5	NAIMI & CERCEO				
		efile@naimicerceo.com 10000 W. Charleston Blvd., Suite 110				
	6	Las Vegas, Nevada 89135				
	7	Telephone: 702.901.4800 Facsimile: 702.463.0905				
135	8	Attorneys for Defendant				
7 891	9	DISTRICT COURT, FAMILY DIVISION CLARK COUNTY, NEVADA				
(RCEO) 110 Las Vegas, NV Fax: 702.463.0905	10	DEVIN REED,	CASE NO.: D-18-568055-D			
Vega 463	11	Plaintiff,	DEPT. NO.: Z			
E0 Las 702.	12		DEFT. NO Z			
CERCEC inte 110 Las		VS.				
CE nite	13	AMANDA REED,				
% St.	14	Defendant.				
	15	NOTICE OF ENTRY OF STIPULATION	ON REGARDING CHILD SUPPORT			
NAIMI ston Blvd : 702.901	16	ARREARS AND CHILD SUPPORT				
narle	17	PLEASE TAKE NOTICE that the Stipulation and Order Regarding Child				
v. Cł elepl	18	Support Arrears and Child Support, was duly entered in the above-referenced case on				
00 V	19	the 17 th day of June 2021.				
100	20	DATED this 18th day of June 2021.				
	21		NAIMI & CERCEO			
	22					
	23	By:	/s/ Carrie J. Primas, Esq.			
			ROBERT CERCEO, ESQ. Nevada Bar No. 5247			
	24		JASON NAIMI, ESQ.			
	25		Nevada Bar No. 9441			
	26		CARRIE J. PRIMAS, ESQ.			
	26		Nevada Bar No. 12070			
	27		10000 W. Charleston Blvd., Ste. 110			
	28		Las Vegas, Nevada 89135			
		1	APPX1272			

Electronically Filed

NAIMI & CERCEO 10000 W. Charleston Blvd., Suite 110 Las Vegas, NV 89135 Telephone: 702.901.4800 Fax: 702.463.0905

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of NA and that on this 18 th day of June 2021, I served a copy of the foregoin	
of Stipulation Regarding Child Support Arrears and Child Support	

□ pursuant to EDCR 8.05(a), EDCR 8.05 (f), NRCP 5(b)(2)(D) and Administrative Order 14-2 captioned "in the Administrative Matter of Mandatory Electronic Service in Eighth Judicial District Court," by mandatory electronic service through the Eighth Judicial District Court' electronic filing system; and/or □ pursuant to EDCR 8.05(a) and NRCP 5(b)(2)(D), because the individual listed

is not registered with the Court's **mandatory** e-service system, via electronic mail or facsimile; and/or

by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class mail postage was prepaid in Las Vegas, Nevada; and/or

To the individual(s) listed below at the address, email address and/ facsimile number indicated below.:

Michancy Cramer michancy@glawvegas.com Alex Ghibaudo <u>alex@glawvegas.com</u>

/s/ Sofia Hall
An employee of Naimi & Cerceo

ELECTRONICALLY SERVED 6/17/2021 9:19 AM

10000 W. Charleston Blvd., Suite 110 Las Vegas, NV 89135 Telephone: 702.901.4800 Fax: 702.463.0905 25

NAIMI & CERCEO

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Electronically Filed CLERK OF THE COURT

Robert Cerceo, Esq. Nevada Bar No. 5247 Jason Naimi, Esq. Nevada Bar No. 9441 Francesca Resch, Esq. Nevada Bar No. 13011 Ilan Acherman, Esq. Nevada Bar No. 12320 Carrie J. Primas, Esq. Nevada Bar No. 12071 NAIMI & CERCEO efile@naimicerceo.com 10000 W. Charleston Blvd., Suite 110 Las Vegas, Nevada 89135 Telephone: 702.901.4800 Facsimile: 702.463.0905 Attorneys for Defendant

DISTRICT COURT, FAMILY DIVISION CLARK COUNTY, NEVADA

DEVIN REED, CASE NO: D-18-568055-D Plaintiff. DEPT. NO.: Z VS. AMANDA REED, Defendant.

STIPULATION AND ORDER REGARDING CHILD SUPPORT ARREARS AND CHILD SUPPORT

Plaintiff, DEVIN REED (hereinafter, "Father"), by and through his attorney, MICHANCY M. CRAMER, ESQ., of ALEX GHIBAUDO, PC, and Defendant, AMANDA REED (hereinafter, "Mother"), by and through her attorney, CARRIE J. PRIMAS, ESQ., of NAIMI & CERCEO, and hereby stipulate and agree to the following:

IT IS HEREBY STIPULATED AND AGREED that there shall be no child support arears owed by either party for the period May, 2020, through April, 2021.

IT IS FURTHER STIPULATED AND AGREED that effective May 1, 2021, Plaintiff shall pay child support to Defendant in the amount of \$350.00 per month. This child support amount is consistent with NAC 425.150 and Wright v. Osburn based on

APPX1274

DISTRICT COURT CLARK COUNTY, NEVADA

CASE NO: D-18-568055-D

DEPT. NO. Department Z

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District 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:

efile@naimicerceo.com

alex@glawvegas.com

michancy@glawvegas.com

Electronically Filed 07/19/2021 6:16 PM CLERK OF THE COURT

ORDR Alex B. Ghibaudo, Esq. 2 Nevada Bar Number: 10592 3 Michancy M. Cramer, Esq. Nevada Bar Number: 11545 4 ALEX GHIBAUDO, PC 5 197 E California Ave Suite 250 Las Vegas, Nevada 89104 6 T: (702) 462-5888 7 F: (702) 924-6553 E: alex@glawvegas.com 8 Attorney for Devin Reed 9 10 EIGHTH JUDICIAL DISTRICT COURT **FAMILY DIVISION** 11 CLARK COUNTY, NEVADA 12 13 DEVIN REED, Case Number: D-18-568055-D 14 Department: Plaintiff. 15 VS. 16 17 AMANDA REED, 18 Defendant. 19 20 **ORDER** 21 THIS MATTER of Defendant's Motion for Reconsideration of the Court's 22 23 Order of February 25, 2021, Plaintiff's Opposition and Countermotion for Revised 24 Custodial Schedule, School Placement, to Resolve Parent-Child Matters, and for 25 Attorney Fees and Costs; Defendant's Reply to Plaintiff's Opposition and 26 27 Countermotion came before the Honorable Michelle Mercer in the Eighth Judicial 28 District Court, Family Division, Department Z on April 30, 2021. Plaintiff DEVIN

APPX1277

1	REED was present and represented by his Attorney, Michancy Cramer, Esq.;		
2	Defendant AMANDA REED was present and represented by her Attorney, Carrie		
3	Primas, Esq. All parties and their counsel appeared via video conference through		
4			
5	the Bluejeans application due to the Coronavirus pandemic.		
6	JOURNAL ENTRIES		
7	The Court heard arguments by Counsel for the parties in regard to the related		
9	matters and relief requested. Following oral argument, the Court stated its		
10	Findings and Ordered the following:		
11	<u>ORDER</u>		
12	IT IS HEREBY ORDERED the children's backpacks shall stay with the		
13	minor children when traveling and exchanges with either parent.		
14 15	IT IS FURTHER ORDERED that both parties shall file and serve an		
16	updated Financial Disclosure Form (FDF).		
17	IT IS FURTHER ORDERED that both parties shall file and exchange their		
18	W-2s.		
19	IT IS FURTHER ORDERED that the Court shall not change prior orders		
20	at this time.		
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IT IS FURTHER ORDE	RED that the matter is set for a Status Check on
May 19, 2021 at 8:15 a.m. to wo	ork out child support issues and submittal of the
parties' FDFs.	
Attorney Cramer to prepare	the order and Attorney Primas to review.
	d administrative language is attached and
	Dated this 19th day of July, 2021 Shell Mercer
	92A 40E 8169 AA86 Michele Mercer District Court Judge
Respectfully Submitted:	Approved as to Form and Content:
//s//Michancy M. Cramer	//s//Carrie Primas
Michancy M. Cramer, Esq. Nevada Bar Number 11545 ALEX B. GHIBAUDO, P.C. 197 E California Ave, Ste 250 Las Vegas, NV 89104 Michancy@glawvegas.com Attorney for Devin Reed	Carrie Primas, Esq. Nevada Bar Number 12071 NAIMI AND CERCEO 10000 W Charleston Blvd, Ste 100 Las Vegas, NV 89135 Jason@naimicerceo.com Attorney for Amanda Reed
	May 19, 2021 at 8:15 a.m. to we parties' FDFs. Attorney Cramer to prepare The mandatory statutory an incorporated herein as Exhibit 1. Respectfully Submitted: //s//Michancy M. Cramer Michancy M. Cramer, Esq. Nevada Bar Number 11545 ALEX B. GHIBAUDO, P.C. 197 E California Ave, Ste 250 Las Vegas, NV 89104 Michancy@glawvegas.com

EXHIBIT 1

EXHIBIT 1

IT IS FURTHER ORDERED that each party shall submit the information required in NRS 125B.055, NRS 125.130 and NRS 125.230 on a separate form to the Court and the Welfare Division of the Department of Human Resources within ten days from the date this Decree is filed. Such information shall be maintained by the Clerk in a confidential manner and not part of the public record. The parties shall update the information filed with the Court and the Welfare Division of the Department of Human Resources within ten days should any of that information become inaccurate.

THE PARTIES ARE ON NOTICE of the following provision of NRS 125C.0045(6):

PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY AS PROVIDED IN NRS 193,130.

NRS 200.359 provides that every person having a limited right of custody to a child or any parent having no right of custody to the child who willfully detains, conceals or removes the child from a parent, guardian or other person having lawful custody or a right of visitation of the child in violation of an order of this court, or removes the child from the jurisdiction of the court without the consent of either the court or all persons who have the right to custody or visitation is subject to being punished for a category D felony as provided in NRS 193.130.

THE PARTIES ARE ON NOTICE that the terms of the Hague Convention of October 25, 1980, adopted by the 14th Session of the Hague Conference on Private International Law, apply if a parent abducts or wrongfully retains a child in a foreign country. The parties are also put on notice of the following provision of NRS 125C.0045(8):

If a parent of the child lives in a foreign country or has significant commitments in a foreign country:

(a) The parties may agree, and the court shall include in the order for custody of the child, that the United States is the country of habitual residence of the child for the purposes of applying the terms of the Hague Convention as set forth in subsection 7.

(b) Upon motion of one of the parties, the court may order the parent to post a bond if the court determines that the parent poses an imminent risk of wrongfully removing or concealing the child outside the country of habitual residence. The bond must be in an amount determined by the court and may be used only to pay for the cost of locating the child and returning him to his habitual residence if the child is wrongfully removed from or concealed outside the country of habitual residence. The fact that a parent has significant commitments in a foreign country does not create a presumption that the parent poses an imminent risk of wrongfully removing or concealing the child.

THE PARTIES ARE ON NOTICE that the parties are subject to the relocation requirements of NRS 125C.006 & NRS 125C.0065. If joint or primary physical custody has been established pursuant to an order, judgment or decree of a court and one parent intends to relocate his or her residence to a place outside of this State or to a place within this State that is at such a distance that would substantially impair the ability of the other parent to maintain a meaningful relationship with the child, and the relocating parent desires to take the child with him or her, the relocating parent shall, before relocating: (a) attempt to obtain the written consent of the nonrelocating parent to relocate with the child; and (b) if the non-relocating parent refuses to give that consent, petition the court for permission to move and/or for primary physical custody for the purpose of relocating. A parent who desires to relocate with a child has the burden of proving that relocating with the child is in the best interest of the child. The court may award reasonable attorney's fees and costs to the relocating parent if the court finds that the non-relocating parent refused to consent to the relocating parent's relocation with the child without having reasonable grounds for such refusal, or for the purpose of harassing the relocating parent. A parent who relocates with a child pursuant to this section without the written consent of the other parent or the permission of the court is subject to the provisions of NRS 200.359.

order and you want to adjust the amount of child support established in this order, you must file a motion to modify the order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the child support obligation established in this order will continue until such time as all children who are the subject of this order reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18 years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the date the motion was filed.

THE PARTIES ARE ON NOTICE that the parties are subject to the provisions of NRS 31A and 125.007 regarding the collection of delinquent child support payments.

THE PARTIES ARE ON NOTICE that either party may request a review of child support every three years pursuant to NRS 125B.145.

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ORDR

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Alex B. Ghibaudo, Esq.

Nevada Bar Number: 10592

Michancy M. Cramer, Esq.

Nevada Bar Number: 11545

ALEX GHIBAUDO, PC

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Attornev for Devin Reed

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EIGHTH JUDICIAL DISTRICT COURT FAMILY DIVISION CLARK COUNTY, NEVADA

DEVIN REED,

Plaintiff,

VS.

AMANDA REED,

Defendant.

Case Number: D-18-568055-D

Department:

ORDER

THIS MATTER came on for decision on Defendant's Motion for Reconsideration, Plaintiff's Opposition and Countermotion, and Defendant's Reply before the Honorable Michelle Mercer in the Eighth Judicial District Court, Family Division, Department Z on June 14, 2021. Plaintiff DEVIN REED was present and represented by his Attorney, Michancy Cramer, Esq.; Defendant AMANDA REED was present and represented by her Attorneys, Carrie Primas, Esq. and

APPX1308

Page 1 of 6

Robert Cerceo, Nevada Bar Number 5247. All parties and their counsel appeared via video conference through the Bluejeans application due to the Coronavirus pandemic.

JOURNAL ENTRIES

The Court confirmed that the parties had started using Our Family Wizard for communications. The Court noted that neither party had filed an updated Financial Disclosure Form (FDF) and counsel represented that the parties had agreed on the child support matters, to include child support going forward as well as any allegation of child support arrears for the previous year. Counsel represented that a Stipulation and Order would be submitted forthwith.

Following oral argument, the Court stated its Findings and Ordered the following:

FINDINGS

THE COURT HEREBY FINDS that pursuant to NRS 125.130(1) a judgment of divorce is a final decree. [1:58:09]

THE COURT FURTHER FINDS that Dr. Paglini's report was delivered on or about January of 2020 and that there was a hearing several days later in front of Judge Gentile. [2:00:09]

THE COURT FURTHER FINDS that despite the fact that it appears that Judge Gentile wanted the parties to enter a decree resolving all other issues and then go forward with custody, it is troublesome to the Court. Because the decree is a final order, there is not a mechanism under Nevada law to pretend the parties are not resolving all the issues under a final decree, despite the paragraph in the decree

that proports to be a savings clause that would allow Defendant to relitigate the issue of custody. [2:01:18]

THE COURT FURTHER FINDS that the proper procedure would have been to resolve the issues pursuant to a marital settlement agreement and incorporate that into a final decree one the issue of custody was addressed in a custody decree that addressed the concerns by Dr. Paglini and Judge Gentile, but that did not happen. [2:01:39]

THE COURT FURTHER FINDS that upon review of the Defendant's Motion, the Court shall clarity its position. Contrary to the Defendant's motion, the Court's position is that it would not consider any evidence of domestic violence that occurred prior to the decree of divorce as a basis for modifying custody after the decree was entered. [2:02:58]

THE COURT FURTHER FINDS that Plaintiff's language towards
Defendant on Our Family Wizard was not appropriate. Although the Plaintiff had
concerns, his language escalated the conflict and was not acceptable to the Court.
[2:27:17]

THE COURT FURTHER FINDS that upon review of the current schedule pursuant to the decree and after hearing from the parties, the current schedule is not in the best interests of the children. There are too many exchanges between the parties, it is a ridiculous and terrible schedule that increases the conflict between the parties, puts the parties in each other's business too much, and is contrary to the best interests of the children. [2:15:30 – 2:36:10]

THE COURT FURTHER FINDS that after hearing from the Defendant, vacation time with each parent is in the best interests of the children and there is no

reason for them not to have a vacation with each parent. [2:45:10]

<u>ORDER</u>

IT IS HEREBY ORDERED that Defendant's Motion for Reconsideration filed on March 17, 2021 is denied. [2:07:28]

IT IS FURTHER ORDERED that custody shall stay the same with the parties sharing Joint Legal and Joint Physical Custody. [2:32:48]

IT IS FURTHER ORDERED that the Custody schedule shall be modified as it is a finding of the Court that reducing interactions between the parties is in the best interests of the children. [2:32:04]

IT IS FURTHER ORDERED that the new custody schedule shall be:

Week 1: Defendant shall have the children starting Thursday at school drop off or 8:00am at the babysitter's until

Week 2: Friday at school drop off or 8:00am at the babysitter's.

Plaintiff shall have Friday at school drop off or 8:00am at the babysitter's until week 1, Thursday at school drop off or 8:00am at the babysitter's.

Every two weeks Defendant/Mom shall have eight days and Plaintiff/Dad shall have six days. [2:39:47]

IT IS FURTHER ORDERED that Plaintiff's countermotion to modify school placement is denied. [2:41:25]

IT IS FURTHER ORDERED that Plaintiff's request to prohibit maternal grandfather from attending school activities on Plaintiff/dad's timeshare is denied with the following caveats:

Maternal grandfather and dad are ordered to stay away from each other. If

they are both present at a function, they shall avoid one another. Dad is responsible for himself and mom is responsible for ensuring that maternal grandfather stays away from dad.

Maternal grandfather may attend sports games, recitals, school plays, and school performances.

Maternal grandfather may NOT attend custody exchanges, doctor appointments for the minor children, or parent-teacher conferences. [2:41:33]

IT IS FURTHER ORDERED that Plaintiff's motion regarding vacation time is granted in part. Each party shall have an additional week (seven days) of vacation time with the children each summer. The parties are required to give each other 30 days notice of their intent to exercise vacation, provide the other parent an itinerary, and allow the children to communicate with the other parent. [2:45:10]

IT IS FURTHER ORDERED that during vacation the parties shall allow the children to communicate with the other parent for 15 minutes each Sunday, Tuesday, and Thursday. As the children are too young for their own phones, the parents are ordered to cooperate and communicate to ensure that the video calls take place in a peaceful and orderly manner. The parties are admonished to be reasonable, communication with each other, to not call each other names, not to make accusations against each other, and to avoid escalating any conflicts. [2:50:20]

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are denied and the parties shall ea	ich bear their own fees and costs. [2:51:3
Attorney Cramer to prepare	e the order and Attorney Primas to review
The second secon	The order and recomey finnes to review
	Dated this 21st day of July, 2021
	Shall Mercer
	00D 504 040D D5D5
	89B E21 849B D7B5 Michele Mercer
Respectfully Submitted:	District Court Judge Approved as to Form and Content:
//s//Michancy M. Cramer	
-	
Michancy M. Cramer, Esq.	Carrie Primas, Esq.
Nevada Bar Number 11545 ALEX B. GHIBAUDO, P.C.	Nevada Bar Number 12071 NAIMI AND CERCEO
197 E California Ave, Ste 250	10000 W Charleston Blvd, Ste 100
Las Vegas, NV 89104 Michancy@glawvegas.com	Las Vegas, NV 89135
Attorney for Devin Reed	Jason@naimicerceo.com Attorney for Amanda Reed

EXHIBIT 1

EXHIBIT 1

IT IS FURTHER ORDERED that each party shall submit the information required in NRS 125B.055, NRS 125.130 and NRS 125.230 on a separate form to the Court and the Welfare Division of the Department of Human Resources within ten days from the date this Decree is filed. Such information shall be maintained by the Clerk in a confidential manner and not part of the public record. The parties shall update the information filed with the Court and the Welfare Division of the Department of Human Resources within ten days should any of that information become inaccurate.

THE PARTIES ARE ON NOTICE of the following provision of NRS 125C.0045(6):

PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY AS PROVIDED IN NRS 193,130.

NRS 200.359 provides that every person having a limited right of custody to a child or any parent having no right of custody to the child who willfully detains, conceals or removes the child from a parent, guardian or other person having lawful custody or a right of visitation of the child in violation of an order of this court, or removes the child from the jurisdiction of the court without the consent of either the court or all persons who have the right to custody or visitation is subject to being punished for a category D felony as provided in NRS 193.130.

THE PARTIES ARE ON NOTICE that the terms of the Hague Convention of October 25, 1980, adopted by the 14th Session of the Hague Conference on Private International Law, apply if a parent abducts or wrongfully retains a child in a foreign country. The parties are also put on notice of the following provision of NRS 125C.0045(8):

If a parent of the child lives in a foreign country or has significant commitments in a foreign country:

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(a) The parties may agree, and the court shall include in the order for custody of the child, that the United States is the country of habitual residence of the child for the purposes of applying the terms of the Hague Convention as set forth in subsection 7.

(b) Upon motion of one of the parties, the court may order the parent to post a bond if the court determines that the parent poses an imminent risk of wrongfully removing or concealing the child outside the country of habitual residence. The bond must be in an amount determined by the court and may be used only to pay for the cost of locating the child and returning him to his habitual residence if the child is wrongfully removed from or concealed outside the country of habitual residence. The fact that a parent has significant commitments in a foreign country does not create a presumption that the parent poses an imminent risk of wrongfully removing or concealing the child.

THE PARTIES ARE ON NOTICE that the parties are subject to the relocation requirements of NRS 125C.006 & NRS 125C.0065. If joint or primary physical custody has been established pursuant to an order, judgment or decree of a court and one parent intends to relocate his or her residence to a place outside of this State or to a place within this State that is at such a distance that would substantially impair the ability of the other parent to maintain a meaningful relationship with the child, and the relocating parent desires to take the child with him or her, the relocating parent shall, before relocating: (a) attempt to obtain the written consent of the nonrelocating parent to relocate with the child; and (b) if the non-relocating parent refuses to give that consent, petition the court for permission to move and/or for primary physical custody for the purpose of relocating. A parent who desires to relocate with a child has the burden of proving that relocating with the child is in the best interest of the child. The court may award reasonable attorney's fees and costs to the relocating parent if the court finds that the non-relocating parent refused to consent to the relocating parent's relocation with the child without having reasonable grounds for such refusal, or for the purpose of harassing the relocating parent. A parent who relocates with a child pursuant to this section without the written consent of the other parent or the permission of the court is subject to the provisions of NRS 200.359.

order and you want to adjust the amount of child support established in this order, you must file a motion to modify the order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the child support obligation established in this order will continue until such time as all children who are the subject of this order reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18 years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the date the motion was filed.

THE PARTIES ARE ON NOTICE that the parties are subject to the provisions of NRS 31A and 125.007 regarding the collection of delinquent child support payments.

THE PARTIES ARE ON NOTICE that either party may request a review of child support every three years pursuant to NRS 125B.145.

CSERV 2 DISTRICT COURT 3 CLARK COUNTY, NEVADA 4 5 Devin Bryson Reed, Plaintiff CASE NO: D-18-568055-D 6 VS. DEPT. NO. Department Z 7 Amanda Raelene Reed, 8 Defendant. 9 10 **AUTOMATED CERTIFICATE OF SERVICE** 11 12 This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order was served via the court's electronic eFile system to all 13 recipients registered for e-Service on the above entitled case as listed below: 14 Service Date: 7/21/2021 15 e File efile@naimicerceo.com 16 Alex Ghibaudo alex@glawvegas.com 17 Michancy Cramer michancy@glawvegas.com 18 19 20 21 22 23 24 25 26 27 28



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Alex Ghibaudo, Esq. Nevada Bar No. 10592 Michancy M. Cramer, Esq.

Nevada Bar No. 11545

ALEX B. GHIBAUDO, PC.

197 E California Ave, Ste 250 Las Vegas, Nevada 89104

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E: alex@glawvegas.com Attorney for Plaintiff

> EIGHTH JUDICIAL DISTRICT COURT CLARK COUNTY, NEVADA

DEVIN REED,

Plaintiff,

VS.

AMANDA REED.

Defendant.

Case Number: D-18-568055-D

Department: Z

NOTICE OF ENTRY OF ORDER

PLEASE TAKE NOTICE that an Order has been entered on this 27th day of July

2021 a copy of which is attached hereto.

DATED this 27th day of July 2021.

By: /s/ Michancy Cramer

Michancy Cramer, Esq. Nevada Bar No.: 11545

197 E California Ave, Ste 250

Las Vegas, Nevada 89104

Attorney for Plaintiff

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Case Number: D-18-568055-D



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of July 2021, I served a true and correct copy of the foregoing **NOTICE OF ENTRY OF ORDER**, via the Court designated electronic service program and/or U.S. Mail, first class postage prepaid, addressed to the following:

Carrie Primas, Esq

10000 W Charleston Blvd, Ste 100 Las Vegas, NV 89135 Attorney for Defendant

By: <u>/s/ Crystal Reed</u>
An Employee of ALEX B. GHIBAUDO, P.C.

Electronically Filed 07/21/2021 7:50 PM

1 ORDR Alex B. Ghibaudo, Esq. 2 Nevada Bar Number: 10592 3 Michancy M. Cramer, Esq. Nevada Bar Number: 11545 4 ALEX GHIBAUDO, PC 5 197 E California Ave Suite 250 6 Las Vegas, Nevada 89104 T: (702) 462-5888 7 F: (702) 924-6553 8 E: alex@glawvegas.com Attorney for Devin Reed 9 10 EIGHTH JUDICIAL DISTRICT COURT FAMILY DIVISION 11 CLARK COUNTY, NEVADA 12 13 DEVIN REED, Case Number: D-18-568055-D 14 Department: Plaintiff. 15 VS. 16 17 AMANDA REED. 18 Defendant. 19 20 **ORDER** 21 THIS MATTER came on for decision on Defendant's Motion for 22 23 Reconsideration, Plaintiff's Opposition and Countermotion, and Defendant's Reply 24 before the Honorable Michelle Mercer in the Eighth Judicial District Court, Family 25 Division, Department Z on June 14, 2021. Plaintiff DEVIN REED was present 26 and represented by his Attorney, Michancy Cramer, Esq.; Defendant AMANDA 27 28 REED was present and represented by her Attorneys, Carrie Primas, Esq. and

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