

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

4
5 JOURNAL ENTRIES

Electronically Filed
Jan 10 2022 11:38 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

6 The Court confirmed that the parties had started using Our Family Wizard
7 for communications. The Court noted that neither party had filed an updated
8 Financial Disclosure Form (FDF) and counsel represented that the parties had
9 agreed on the child support matters, to include child support going forward as well
10 as any allegation of child support arrears for the previous year. Counsel
11 represented that a Stipulation and Order would be submitted forthwith.
12

13 Following oral argument, the Court stated its Findings and Ordered the
14 following:
15

16 **FINDINGS**

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

19 **THE COURT FURTHER FINDS** that Dr. Paglini's report was delivered
20 on or about January of 2020 and that there was a hearing several days later in front
21 of Judge Gentile. [2:00:09]
22

23 **THE COURT FURTHER FINDS** that despite the fact that it appears that
24 Judge Gentile wanted the parties to enter a decree resolving all other issues and
25 then go forward with custody, it is troublesome to the Court. Because the decree is
26 a final order, there is not a mechanism under Nevada law to pretend the parties are
27 not resolving all the issues under a final decree, despite the paragraph in the decree
28

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

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

8
9 **THE COURT FURTHER FINDS** that upon review of the Defendant's
10 Motion, the Court shall clarity its position. Contrary to the Defendant's motion,
11 the Court's position is that it would not consider any evidence of domestic violence
12 that occurred prior to the decree of divorce as a basis for modifying custody after
13 the decree was entered. [2:02:58]

14
15 **THE COURT FURTHER FINDS** that Plaintiff's language towards
16 Defendant on Our Family Wizard was not appropriate. Although the Plaintiff had
17 concerns, his language escalated the conflict and was not acceptable to the Court.
18 [2:27:17]

19
20 **THE COURT FURTHER FINDS** that upon review of the current schedule
21 pursuant to the decree and after hearing from the parties, the current schedule is not
22 in the best interests of the children. There are too many exchanges between the
23 parties, it is a ridiculous and terrible schedule that increases the conflict between
24 the parties, puts the parties in each other's business too much, and is contrary to the
25 best interests of the children. [2:15:30 – 2:36:10]

26
27 **THE COURT FURTHER FINDS** that after hearing from the Defendant,
28 vacation time with each parent is in the best interests of the children and there is no

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

2
3 **ORDER**

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

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

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

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

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

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

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

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

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

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

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

1 they are both present at a function, they shall avoid one another. Dad is
2 responsible for himself and mom is responsible for ensuring that maternal
3 grandfather stays away from dad.
4

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

7 Maternal grandfather may NOT attend custody exchanges, doctor
8 appointments for the minor children, or parent-teacher conferences. [2:41:33]
9

10 **IT IS FURTHER ORDERED** that Plaintiff's motion regarding vacation
11 time is granted in part. Each party shall have an additional week (seven days) of
12 vacation time with the children each summer. The parties are required to give each
13 other 30 days notice of their intent to exercise vacation, provide the other parent an
14 itinerary, and allow the children to communicate with the other parent. [2:45:10]
15

16 **IT IS FURTHER ORDERED** that during vacation the parties shall allow
17 the children to communicate with the other parent for 15 minutes each Sunday,
18 Tuesday, and Thursday. As the children are too young for their own phones, the
19 parents are ordered to cooperate and communicate to ensure that the video calls
20 take place in a peaceful and orderly manner. The parties are admonished to be
21 reasonable, communication with each other, to not call each other names, not to
22 make accusations against each other, and to avoid escalating any conflicts.
23 [2:50:20]
24

25 ...

26 ...
27
28

IT IS FURTHER ORDERED that both parties' request for attorney fees are denied and the parties shall each bear their own fees and costs. [2:51:30]

Attorney Cramer to prepare the order and Attorney Primas to review.

Dated this 21st day of July, 2021

Shell Merce

89B E21 849B D7B5

Michele Mercer

District Court Judge

Approved as to Form and Content:

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
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

EXHIBIT 1

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EXHIBIT 1

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

8 **THE PARTIES ARE ON NOTICE** of the following provision of NRS
9 125C.0045(6):

10 PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION,
11 CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION
12 OF THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY
13 AS PROVIDED IN NRS 193.130.

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

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

26 If a parent of the child lives in a foreign country or has significant
27 commitments in a foreign country:
28

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

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

15 **THE PARTIES ARE ON NOTICE** that the parties are subject to the
16 relocation requirements of NRS 125C.006 & NRS 125C.0065. If joint or primary
17 physical custody has been established pursuant to an order, judgment or decree of a
18 court and one parent intends to relocate his or her residence to a place outside of this
19 State or to a place within this State that is at such a distance that would substantially
20 impair the ability of the other parent to maintain a meaningful relationship with the
21 child, and the relocating parent desires to take the child with him or her, the relocating
22 parent shall, before relocating: (a) attempt to obtain the written consent of the non-
23 relocating parent to relocate with the child; and (b) if the non-relocating parent refuses
24 to give that consent, petition the court for permission to move and/or for primary
25 physical custody for the purpose of relocating. A parent who desires to relocate with a
26 child has the burden of proving that relocating with the child is in the best interest of the
27 child. The court may award reasonable attorney's fees and costs to the relocating parent
28 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.

1 **THE PARTIES ARE ON NOTICE** that if this order includes a child support
2 order and you want to adjust the amount of child support established in this order, you
3 must file a motion to modify the order with or submit a stipulation to the court. If a
4 motion to modify the order is not filed or a stipulation is not submitted, the child
5 support obligation established in this order will continue until such time as all children
6 who are the subject of this order reach 18 years of age or, if the youngest child who is
7 subject to this order is still in high school when he or she reaches 18 years of age, when
8 the child graduates from high school or reaches 19 years of age, whichever comes first.
9 Unless the parties agree otherwise in a stipulation, any modification made pursuant to a
10 motion to modify the order will be effective as of the date the motion was filed.
11

12 **THE PARTIES ARE ON NOTICE** that the parties are subject to the
13 provisions of NRS 31A and 125.007 regarding the collection of delinquent child
14 support payments.
15

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

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA
4

5
6 Devin Bryson Reed, Plaintiff

CASE NO: D-18-568055-D

7 vs.

DEPT. NO. Department Z

8 Amanda Raelene Reed,
9 Defendant.

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Order 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: 7/21/2021

15 e File

efile@naimicerceo.com

16 Alex Ghibaudo

alex@glawvegas.com

17 Michancy Cramer

michancy@glawvegas.com

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19
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21
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23
24
25
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27
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APPX1297



Steven D. Grierson

1 NEOJ

2 Alex Ghibaud, Esq.

3 Nevada Bar No. 10592

4 Michancy M. Cramer, Esq.

5 Nevada Bar No. 11545

6 **ALEX B. GHIBAUDO, PC.**

7 197 E California Ave, Ste 250

8 Las Vegas, Nevada 89104

9 T: (702) 462-5888

10 F: (702) 924-6553

11 E: alex@glawvegas.com

12 *Attorney for Plaintiff*

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

15 DEVIN REED,

16 Plaintiff,

17 vs.

18 AMANDA REED,

19 Defendant.

Case Number: D-18-568055-D

Department: Z

20 **NOTICE OF ENTRY OF ORDER**

21 PLEASE TAKE NOTICE that an Order has been entered on this 27th day of July
22 2021 a copy of which is attached hereto.

23 DATED this 27th day of July 2021.

24 By: /s/ Michancy Cramer

25 Michancy Cramer, Esq.

26 Nevada Bar No.: 11545

27 197 E California Ave, Ste 250

28 Las Vegas, Nevada 89104

Attorney for Plaintiff

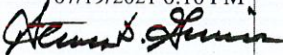


CERTIFICATE OF SERVICE

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: /s/ Crystal Reed
An Employee of ALEX B. GHIBAUDO, P.C.


CLERK OF THE COURT

ORDR

Alex B. Ghibaud, Esq.
Nevada Bar Number: 10592
Michancy M. Cramer, Esq.
Nevada Bar Number: 11545
ALEX GHIBAUDO, PC
197 E California Ave Suite 250
Las Vegas, Nevada 89104
T: (702) 462-5888
F: (702) 924-6553
E: alex@glawvegas.com
Attorney for Devin Reed

**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 of Defendant's Motion for Reconsideration of the Court's Order of February 25, 2021, Plaintiff's Opposition and Countermotion for Revised Custodial Schedule, School Placement, to Resolve Parent-Child Matters, and for Attorney Fees and Costs; Defendant's Reply to Plaintiff's Opposition and Countermotion came before the Honorable Michelle Mercer in the Eighth Judicial District Court, Family Division, Department Z on April 30, 2021. Plaintiff DEVIN

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 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

8 matters and relief requested. Following oral argument, the Court stated its

9 Findings and Ordered the following:

11 **ORDER**

12 **IT IS HEREBY ORDERED** the children's backpacks shall stay with the

13 minor children when traveling and exchanges with either parent.

14 **IT IS FURTHER ORDERED** that both parties shall file and serve an

15 updated Financial Disclosure Form (FDF).

16 **IT IS FURTHER ORDERED** that both parties shall file and exchange their

17 W-2s.

18 **IT IS FURTHER ORDERED** that the Court shall not change prior orders

19 at this time.

20 ...

21 ...

22 ...

23 ...

24 ...

IT IS FURTHER ORDERED that the matter is set for a Status Check on May 19, 2021 at 8:15 a.m. to work out child support issues and submittal of the parties' FDFs.

Attorney Cramer to prepare the order and Attorney Primas to review.

The mandatory statutory and administrative language is attached and incorporated herein as Exhibit 1.

Dated this 19th day of July, 2021

Shell Merger

~~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

EXHIBIT 1

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EXHIBIT 1

APPX1303

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

8 **THE PARTIES ARE ON NOTICE** of the following provision of NRS
9 125C.0045(6):

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11 CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION
12 OF THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY
13 AS PROVIDED IN NRS 193.130.

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

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

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27 commitments in a foreign country:
28

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

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

14 **THE PARTIES ARE ON NOTICE** that the parties are subject to the
15 relocation requirements of NRS 125C.006 & NRS 125C.0065. If joint or primary
16 physical custody has been established pursuant to an order, judgment or decree of a
17 court and one parent intends to relocate his or her residence to a place outside of this
18 State or to a place within this State that is at such a distance that would substantially
19 impair the ability of the other parent to maintain a meaningful relationship with the
20 child, and the relocating parent desires to take the child with him or her, the relocating
21 parent shall, before relocating: (a) attempt to obtain the written consent of the non-
22 relocating parent to relocate with the child; and (b) if the non-relocating parent refuses
23 to give that consent, petition the court for permission to move and/or for primary
24 physical custody for the purpose of relocating. A parent who desires to relocate with a
25 child has the burden of proving that relocating with the child is in the best interest of the
26 child. The court may award reasonable attorney's fees and costs to the relocating parent
27 if the court finds that the non-relocating parent refused to consent to the relocating
28 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.

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2 order and you want to adjust the amount of child support established in this order, you
3 must file a motion to modify the order with or submit a stipulation to the court. If a
4 motion to modify the order is not filed or a stipulation is not submitted, the child
5 support obligation established in this order will continue until such time as all children
6 who are the subject of this order reach 18 years of age or, if the youngest child who is
7 subject to this order is still in high school when he or she reaches 18 years of age, when
8 the child graduates from high school or reaches 19 years of age, whichever comes first.
9 Unless the parties agree otherwise in a stipulation, any modification made pursuant to a
10 motion to modify the order will be effective as of the date the motion was filed.
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12 **THE PARTIES ARE ON NOTICE** that the parties are subject to the
13 provisions of NRS 31A and 125.007 regarding the collection of delinquent child
14 support payments.
15

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

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA
4

5
6 Devin Bryson Reed, Plaintiff

CASE NO: D-18-568055-D

7 vs.

DEPT. NO. Department Z

8 Amanda Raelene Reed,
9 Defendant.

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Order 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: 7/19/2021

15 e File

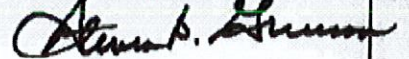
efile@naimicerceo.com

16 Alex Ghibaudo

alex@glawvegas.com

17 Michancy Cramer

michancy@glawvegas.com



1 **SMT**
2 RACHEAL H. MASTEL, Esq.
3 Nevada Bar No. 11646
4 KAINEN LAW GROUP, PLLC
5 3303 Novat Street, Suite 200
6 Las Vegas, Nevada 89129
7 Telephone: (702) 823-4900
8 Facsimile: (702) 823-4488
9 service@KainenLawGroup.com
10 Attorney for Defendant

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DISTRICT COURT
CLARK COUNTY, NEVADA

DEVIN REED,

Plaintiff,

vs.

AMANDA REED,

Defendant.

D-18-568055-D

CASE NO: D-18-586055-D
DEPT NO: Z

CASE APPEAL STATEMENT

Pursuant to NRAP 3(f), Defendant, AMANDA REED, hereby submits the following case appeal statement:

A. District court case number and caption, showing names of all parties to the proceedings (without using *et al.*): D-18-586055-D - DEVIN REED, Plaintiff v. AMANDA REED, Defendant.

B. Name of judge who entered order or judgment being appealed: Judge Michelle Mercer.

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APPX1319

1 C. Name of each appellant, and name and address of counsel for each
2 appellant: AMANDA REED - District Court counsel was CARRIE PRIMAS, ESQ.,
3 10000 W. Charleston Blvd., Ste 100, Las Vegas, Nevada 89135; and Appellate counsel
4 will be RACHEAL H. MASTEL, ESQ., 3303 Novat Street, Suite 200, Las Vegas,
5 Nevada 89129.

6 D. Name of each respondent, and name and address of each respondent's
7 appellate counsel, if known: DEVIN REED - District Court counsel was MICHANCY
8 M. CRAMER, ESQ., 197 E. California Ave, Ste 250, Las Vegas, Nevada 89104.

9 E. Whether attorneys identified in subparagraph D are not licensed to
10 practice law in Nevada; and if so, whether the district court granted permission to appear
11 under SCR 42 (include copy of district court order granting permission): All attorneys
12 identified within are licensed to practice law in the state of Nevada.

13 F. Whether appellant was represented by appointed counsel in the district
14 court or on appeal: Appellant retained counsel only.

15 G. Whether any appellant was granted leave to proceed in forma
16 pauperis: No.

17 H. Date proceedings were commenced in district court: Initially,
18 Plaintiff/Respondent filed a Complaint for Divorce on March 20, 2018.
19 Defendant/Appellant subsequently filed an Answer and Counterclaim for Divorce on
20 April 10, 2018.

21 I. Brief description of nature of the action and result in district court,
22 including type of judgment or order being appealed and relief granted by district court:

23 A) Appellant appeals the Trial Court's Order, filed July 21, 2021,
24 denying Defendant's Motion for Reconsideration, filed March
25 17, 2021. Because of delays related to custody proceedings,
26 Judge Denise Gentile, the prior judge on this matter, bifurcated
27 the divorce and held open custody proceedings. The parties'
28 resolved property and entered a Decree which reflected the

1 existing custody litigation. Judge Gentile set the custody issues
2 for an evidentiary hearing. After the case was administratively
3 transferred, Judge Mercer found, without holding the
4 evidentiary hearing that was previously granted and set, that
5 the Decree was final as to all issues, and Domestic Violence
6 and other relevant facts which were known to the parties pre-
7 Decree, but remained unadjudicated by the Court, were not
8 permitted as a basis to change custody. However, the Court
9 modified the timeshare and vacation time without an
10 Evidentiary Hearing, at Respondent's request.

11 J. Whether case was previously subject of appeal or writ proceeding in
12 Nevada Supreme Court, and if so, caption and docket number of prior proceeding: No.

13 K. Whether appeal involves child custody or visitation: Yes.

14 L. Whether appeal involves possibility of settlement: Unknown

15 Dated this 4 day of August, 2021.

16 KAINEN LAW GROUP, PLLC

17 By 

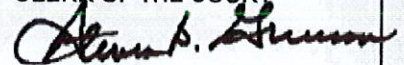
18 RACHEAL H. MASTEL, ESQ.

19 Nevada Bar No. 11646

20 3303 Novat Street, Suite 200

21 Las Vegas, Nevada 89129

22 Attorney for Defendant
23
24
25
26
27
28



1 **COS**
2 RACHEAL H. MASTEL, Esq.
3 Nevada Bar No. 11646
4 KAINEN LAW GROUP, PLLC
5 3303 Novat Street, Suite 200
6 Las Vegas, Nevada 89129
7 Telephone: (702) 823-4900
8 Facsimile: (702) 823-4488
9 service@KainenLawGroup.com
10 Attorney for Defendant

7 DISTRICT COURT
8 CLARK COUNTY, NEVADA

9
10 DEVIN REED,

D-18-568055-D

11 Plaintiff,

CASE NO: ~~D-18-586055-D~~
DEPT NO: Z

12 vs.

13 AMANDA REED,

14 Defendant.

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16
17 **CERTIFICATE OF SERVICE**

18 I HEREBY CERTIFY that on the 4th day of August, 2021, I caused to be
19 served the following documents:

20 1. *Case Appeal Statement (Efiled 8.4.21)*

21 2. *Notice of Appeal (Efiled 8.4.21)*

22 BY MAIL: Pursuant to NRCP 5(b), I caused a true copy thereof to be placed
23 in the U.S. Mail, enclosed in a sealed envelope, postage fully prepaid thereon, addressed
24 as follows:

25 BY CERTIFIED MAIL: I caused a true copy thereof to be placed in the
26 U.S. Mail, enclosed in a sealed envelope, certified mail, return receipt requested, postage
27 fully paid thereon, addressed as follows:

28 ...

KAINEN LAW GROUP, PLLC
3303 Novat Street, Suite 200
Las Vegas, Nevada 89129
702.823.4900 • Fax 702.823.4488
www.KainenLawGroup.com

APPX1322

KAINEN LAW GROUP, PLLC
3303 Novat Street, Suite 200
Las Vegas, Nevada 89129
702.823.4900 • Fax 702.823.4488
www.KainenLawGroup.com

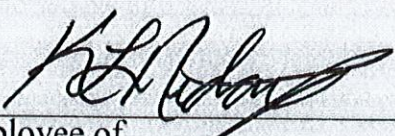
1 BY FACSIMILE: Pursuant to EDCR 7.26, I caused a true copy thereof to
2 be transmitted, via facsimile, to the following number(s):

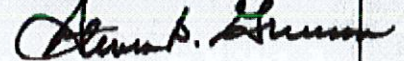
3 X BY ELECTRONIC MAIL: Pursuant to EDCR 7.26 and NEFCR Rule 9, I
4 caused a true copy thereof to be served via electronic mail, via Wiznet, to the following
5 e-mail address(es):

6 Michancy@glawvegas.com

7 Alex@glawvegas.com

8 Efile@naimicerceo.com

9
10 
11 An Employee of
12 KAINEN LAW GROUP, PLLC



1 **NTC**
2 RACHEAL H. MASTEL, Esq.
3 Nevada Bar No. 11646
4 KAINEN LAW GROUP, PLLC
5 3303 Novat Street, Suite 200
6 Las Vegas, Nevada 89129
7 Telephone: (702) 823-4900
8 Facsimile: (702) 823-4488
9 service@KainenLawGroup.com
10 Attorney for Defendant

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DISTRICT COURT
CLARK COUNTY, NEVADA

DEVIN REED,

Plaintiff,

vs.

AMANDA REED,

Defendant.

D-18-568055-D

CASE NO: D-18-586055-D
DEPT NO:

NOTICE OF APPEAL

Notice is hereby given that Defendant, AMANDA REED, appeals to the Nevada Supreme Court from Order, filed on July 21, 2021 (Notice of Entry of Order was also filed on July 27, 2021) copy of which is attached hereto as **Exhibit "A"**.

Dated this 4 day of August, 2021.

KAINEN LAW GROUP, PLLC

By: 

RACHEAL H. MASTEL, ESQ.
Nevada Bar No. 11646
3303 Novat Street, Suite 200
Las Vegas, Nevada 89129
Attorney for Defendant

KAINEN LAW GROUP, PLLC
3303 Novat Street, Suite 200
Las Vegas, Nevada 89129
702.823.4900 • Fax 702.823.4488
www.KainenLawGroup.com

APPX1324

EXHIBIT “A”



Steven D. Grierson

1 NEOJ

2 Alex Ghibauda, Esq.

3 Nevada Bar No. 10592

4 Michancy M. Cramer, Esq.

5 Nevada Bar No. 11545

6 ALEX B. GHIBAUDO, PC.

7 197 E California Ave, Ste 250

8 Las Vegas, Nevada 89104

9 T: (702) 462-5888

10 F: (702) 924-6553

11 E: alex@glawvegas.com

12 Attorney for Plaintiff

13 EIGHTH JUDICIAL DISTRICT COURT
14 CLARK COUNTY, NEVADA

15 DEVIN REED,

16 Plaintiff,

17 vs.

18 AMANDA REED,

19 Defendant.

Case Number: D-18-568055-D

Department: Z

20 NOTICE OF ENTRY OF ORDER

21 PLEASE TAKE NOTICE that an Order has been entered on this 27th day of July
22 2021 a copy of which is attached hereto.

23 DATED this 27th day of July 2021.

24 By: /s/ Michancy Cramer

25 Michancy Cramer, Esq.

26 Nevada Bar No.: 11545

27 197 E California Ave, Ste 250

28 Las Vegas, Nevada 89104

Attorney for Plaintiff



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: /s/ Crystal Reed
An Employee of ALEX B. GHIBAUDO, P.C.

Alex B. Ghibaud
CLERK OF THE COURT

ORDER

Alex B. Ghibaud, Esq.
Nevada Bar Number: 10592
Michancy M. Cramer, Esq.
Nevada Bar Number: 11545
ALEX GHIBAUDO, PC
197 E California Ave Suite 250
Las Vegas, Nevada 89104
T: (702) 462-5888
F: (702) 924-6553
E: alex@glawvegas.com
Attorney for Devin Reed

**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