

1 MS. PRIMAS: Yeah. So it was from May 13th, 2020.

2 THE COURT: Okay. That was the date of the hearing.

3 And then the written order was entered August 19th, 2020, I  
4 believe.

5 MS. PRIMAS: No, no. There was a minute order  
6 issued. I don't think there was actually ever an order  
7 entered, so that there's a minute order --

8 THE COURT: I'm -- I'm looking at it. I'm looking  
9 at the order.

10 MS. PRIMAS: Oh --

11 THE COURT: It's -- it was entered August 19 of  
12 2020. It was prepared by you.

13 MS. PRIMAS: From the May hearing, Your Honor?

14 THE COURT: From the May 13th hearing. And on --

15 MS. PRIMAS: Oh, okay. Yes. Correct. It was --

16 THE COURT: -- on page 4 -- on page 4, lines 16 on,  
17 says -- it says it is further order that based upon the  
18 current situation where the children aren't going to school  
19 and Plaintiff Dad is not working, the request from counsel to  
20 shift Plaintiff Dad's time to the weekends, the Court finds it  
21 is in the best interests to modify the schedule as follows.  
22 Week one shall be modified where Plaintiff Dad normally had  
23 midweek time with the children, this weekly time will be  
24 shifted to the following weekend. This will allow Plaintiff

1 Dad to be involved in assisting Abby with her session and can  
2 participate by attending.

3           So it looks like, yeah, this was intended to be  
4 temporary, based on Dad's unemployment. So I could, I  
5 believe, in the best interests of the child, since this is not  
6 -- she did not change a designation of the parties to Mom  
7 having primary physical. I don't see that anywhere. If  
8 either one of you all can see that?

9           MS. PRIMAS: Well, it's -- it's not, Your Honor.  
10 And -- and Ms. Cramer did state properly and my position is  
11 that -- was that Mom had de facto primary physical. Now, I  
12 understand if your client's position -- or I mean, if Your  
13 Honor's ruling is that you would be setting child support  
14 during that time based on a joint physical custody  
15 arrangement, then Ms. Cramer and I may be able to work out the  
16 child support issue by -- by exchanging the W-2s.

17           THE COURT: Well, this whole hearing has kind of  
18 gone -- we've been on for an hour and 10 minutes, and I've got  
19 another case pending. I'd like to recess this case, and you  
20 all are free to talk amongst yourselves while I'm gone. But  
21 let me handle the other hearing, and come back to this, and  
22 maybe we can wrap this up. Because I want to look at this a  
23 little more close -- closely. So we're going to recess  
24 temporarily, and we'll be back shortly. Feel free --

1 MS. CRAMER: Okay.

2 THE COURT: -- to contact one another and talk about  
3 that, if you are so inclined. All right.

4 (COURT RECESSED AT 2:10:13 AND RESUMED AT 2:42:04)

5 THE COURT: We're back on the record in the matter  
6 of Reed versus Reed, case D-18-568055-D, and everybody is  
7 present again. Were -- were there any discussions that you  
8 all want to bring me up to speed about, or do you want to just  
9 hear from me?

10 MS. PRIMAS: Well, Your Honor, I'd like an  
11 opportunity to respond to all of Ms. Cramer's allegations.

12 THE COURT: Okay.

13 MS. PRIMAS: Thank you, Your Honor.

14 THE COURT: Go ahead.

15 MS. PRIMAS: And I'll go -- I'll go issue by issue  
16 so it's -- it's clear for Your Honor. Let me start by saying  
17 that numerous things that Ms. Cramer's claiming are disproven  
18 by -- by exhibits we've already submitted, by messages between  
19 the parties. Ms. Cramer indicates they have one still shot of  
20 one video from one exchange, showing my client with her arm --  
21 her hand on her dad's arm.

22 The entire video of that exchange which has  
23 previously been submitted to the Court shows Devin as the  
24 aggressor and coming towards Amanda. The issue related to the

1 problems with exchanges where they allege that Amanda's making  
2 the child run away, and is saying things to the -- to the  
3 child, the child is running away, because she doesn't want to  
4 go with Dad, and my client is chasing her across parking lots  
5 and chasing her down streets, and trying to convince her that  
6 she needs to go with Dad.

7           Your Honor, this is why we believe it's very  
8 important that the Court hold an evidentiary hearing on these  
9 issues, because we've submitted I think close to 50 videos as  
10 exhibits to -- to motions, and not just in front of Your  
11 Honor, but historically in this case, leading up to the  
12 custodial evaluation, we're prepared to present those at  
13 trial, that show Dad as the aggressor at these exchanges. As  
14 it relates to the exchanges and the time share, Your Honor,  
15 Dad's claiming that the -- the exchanges are the reason he  
16 wants to change the time share.

17           But the exchanges were occurring for two years prior  
18 to the current time share being agreed to in the decree of  
19 divorce. If -- if Dad's position is that everything prior to  
20 the decree of divorce shouldn't be considered by this Court  
21 and that the parties should be held to any agreements made in  
22 the decree of divorce, the fact is that following April of  
23 2020, first of all, the exchanges had actually become far less  
24 contentious, I guess I will say, but that the majority of

1 these issues that arose at the exchanges occurred prior to the  
2 time share.

3           So it doesn't make sense for Dad to say, oh, we  
4 should have week on, week off because the time share -- or the  
5 exchanges are bad, when he agreed to the time share in the --  
6 in the decree. The fact, again, Your Honor, is that these  
7 videos that we have submitted show him as the aggressor and  
8 show Mom simply trying to get the child to go with Dad. I'm  
9 not sure what Dad would have her do when you have a five and  
10 six year old child running down the sidewalk on the side of a  
11 busy street, and running across a -- a parking lot. If he  
12 would prefer she not chase the child, I suppose we can all  
13 take the risk, Your Honor, but I don't know what else my  
14 client is to do when Dad's not taking -- making any effort to  
15 get the child.

16           It's Mom who is coaxing the child physically out of  
17 her car. Mom is prying the child's hands off of Mom's arm,  
18 off of the seatbelt, and physically putting her in Dad's car.  
19 This is what's happening at the exchanges, because the child's  
20 not wanting to go with Dad, and my client doesn't do anything  
21 but physically force her child to go because it is Dad's time  
22 share.

23           I -- I want to speak real quickly on the issue of  
24 Mom undermining Dad because of her position at the school.

1 Ms. Cramer has --

2 THE COURT: Okay. Ms. Primas --

3 MS. PRIMAS: -- specifically --

4 THE COURT: -- wait, wait, wait, wait. Ms. Primas,

5 before you shift gears --

6 MS. PRIMAS: Yes, Your Honor.

7 THE COURT: -- when -- when did that happen, that

8 exchange that you're talking about?

9 MS. PRIMAS: Your Honor, repeatedly, from the fall

10 of 2018 until the spring of 2020.

11 MS. CRAMER: No. Your Honor --

12 MS. PRIMAS: And we --

13 MS. CRAMER: (Indiscernible) --

14 THE COURT: (Indiscernible) --

15 MS. PRIMAS: -- have videos, Your Honor, which is

16 again -- and Ms. Cramer's going to say it didn't happen, which

17 is why I think it is crucial to this case for the Court to

18 make appropriate findings, that there be an evidentiary

19 hearing so the Court can see these recordings.

20 MS. CRAMER: And, Your Honor, the video that I'm

21 referring to was done in April of 2020. It was after the

22 decree. I'm not talking about the 50 videos, because Ms. Reed

23 videos the exchanges constantly. I'm talking about the one in

24 April of 2020, and I will tell you, Your Honor, the less

1 contentious exchanges, if you notice, after that hearing in  
2 May with Judge Gentile, Judge Gentile prohibited Mom's dad,  
3 the maternal grandfather, from coming to the exchanges. And  
4 so that is what made the difference.

5 THE COURT: Okay. Thank you, Ms. Cramer. Go ahead,  
6 Ms. Primas. You can go on to the next point that you were  
7 going to make.

8 MS. PRIMAS: Thank you, Your Honor. On the issue of  
9 Mom undermining Dad, you heard Ms. Cramer specifically say  
10 that Dad had the children brought to school an hour before  
11 school started to drop them off to Mom. Dad -- there's been  
12 numerous instances -- Dad's child -- Dad's grown child,  
13 Daniel, does all of the drop offs to school. There -- Mom has  
14 no issue with that.

15 There have been numerous instances since the  
16 children are returned to in person school just this spring  
17 where Daniel calls Mom and says, I can't get the kids to come  
18 into school. They won't leave. They're throwing a fit. And  
19 Mom comes out and helps them. If Ms. Cramer and -- and  
20 Mr. Reed would like Mom to stop being involved in any way,  
21 we're fine with that, and Dad has an obligation then to get  
22 the children to class. He can't call Mom -- he can't drop the  
23 children off at school an hour early, in the parking lot, to  
24 Mom, for Mom to get them to class, and then claim that Mom is

1 undermining, Your Honor.

2           On -- on the issue of Dad bought jackets and Mom  
3 took them, there are -- there were jackets that Dad thought  
4 were left at Mom's house. Dad then sent Our Family Wizard  
5 messages to Mom saying, never mind, I found the jackets. On  
6 the issue of Mom taking the lunch box and the backpack, Mom  
7 didn't do that. If she had, and Dad didn't have them, Dad  
8 would've sent Mom another Our Family Wizard message, hey,  
9 Amanda, the kids start school tomorrow, you have their stuff.  
10 Please make sure to bring it for me. He didn't do that.

11           And certainly, she didn't take their masks, because  
12 they weren't wearing masks when they were last in school, but  
13 yet he sends them without masks, which I'm not sure if Your  
14 Honor is aware, but the children are required at this point in  
15 school to be wearing. He's not sending them prepared. He's  
16 claiming that Mom's doing all of these things, and again, Your  
17 Honor, this is the issue in this case, where Dad just spews  
18 lies, and -- and with absolutely no proof, yet Mom has videos  
19 and messages between the parties indicating that what he's  
20 saying is not true.

21           He has sent Our Family Wizards, as well, indicating  
22 that he doesn't brush the children's teeth. That's how Mom  
23 knows. No, Mom is not in the home. Dad has told her in  
24 messages that he doesn't brush their teeth because it's too



1 difficult.

2           On the issue of the therapy, again, it's a lie, Your  
3 Honor. They claimed that Judge Gentile changed the schedule  
4 because Mom kept changing therapy to different days. No, Your  
5 Honor. Since 2018, and again, the therapist is prepared to  
6 testify if Your Honor needs an objective third party evidence  
7 of this, since 2018, the child has had therapy on Monday  
8 night. It's been two-and-a-half years of therapy on Monday  
9 night. There was a period where Dad withdrew his consent, and  
10 we had to file a motion to get the child back into therapy.  
11 So there has been a period of -- of no therapy. But there has  
12 only ever been therapy on Monday night.

13           The reason Judge Gentile changed Dad's time share to  
14 extend to Monday evening is because Dad indicated that he  
15 wanted to be -- to participate in bringing the child, and Mom  
16 said that's fine, and let's alternate. So she changed the  
17 schedule so Dad gets to take the child every other week. That  
18 said, there was one week where he missed the therapy with no  
19 notice to Mom, and no notice to the therapist.

20           Your Honor, on the issue of this -- this contact  
21 with the other siblings, there is no -- there is nothing that  
22 says that the children cannot have contact with their other  
23 siblings. The issue related to the minor child Jacob  
24 specifically is to overnights. It does not say zero contact,

1 and at no point has my client said there should be zero  
2 contact. It is specifically to overnights. Ms. Cramer  
3 alleges that there's no problem with Jacob. But if there's no  
4 problem, then how come Dad agreed to a stipulation made into a  
5 permanent order that the minor children would not have  
6 overnights with Jacob?

7 Ms. Cramer also claims that Mom hates Jacob because  
8 he's Dad's child. But that makes no sense, either, because  
9 there's three children, and why does Mom hate one of them, but  
10 not the other two? The issue is that there are problems with  
11 Jacob. There was concerning behavior with Jacob. The parties  
12 during their marriage agreed that Jacob would not be alone  
13 with the children that then extended to during the divorce  
14 proceedings, Dad knew that there was concerns, and then agreed  
15 there would be no overnights. This is not about all of Dad's  
16 children that Mom hates. This is about one child that has had  
17 concerning behavior, which Dad obviously agreed with because  
18 he stipulated to the order.

19 On -- on the issue of the -- of the money that Dad  
20 is supposed to pay, Your Honor, from the decree, it's -- it's  
21 also not true that he has continued to pay. He was supposed  
22 to start making payments on March 1st, 2020, towards the  
23 judgment of \$7500. He has made a payment in March and April  
24 of 2021. That is the only payments he has made. For the

1 prior 12 months, he made zero payments towards that. So not  
2 only is there the issue of contempt, which if -- if Your Honor  
3 is not satisfied with our prior motion, we certainly can file  
4 a new motion. But it's again a misrepresentation to this  
5 Court by Dad about what his has done -- and -- and how he has  
6 been acting.

7           That's all (indiscernible) I just want to make one  
8 more comment on the issue of child support. I did previously  
9 state that I believe we can address that with Counsel, and I  
10 think we can. But I would ask for an order from Your Honor as  
11 follows. Dad's employed by the union. And I'm sure Your  
12 Honor is aware that through the union, the union members get  
13 jobs with different companies. So we either need Dad's entire  
14 tax transcript, or we need Dad's union record so that we're  
15 sure that we're getting W-2s from -- from all of the companies  
16 that he may have been employed with throughout 2020.

17           Oh, I'm sorry. One other thing, Your Honor. Just  
18 circling back to the issue of the time share. As Ms. Cramer  
19 pointed out, I do not believe, as Ms. Cramer does not believe  
20 that the Court has discretion to modify that time share  
21 without an evidentiary hearing. So based on Counsel's  
22 representation (indiscernible) understanding again, and  
23 importance of the evidence in this case that's been  
24 misrepresented by Dad, and that I think the Court needs to

1 see, we would ask that an evidentiary hearing be granted on  
2 that issue prior to the Court making any changes to the time  
3 share.

4 THE COURT: So, Ms. Primas --

5 MS. CRAMER: Your Honor --

6 THE COURT: -- Ms. Primas, I want to make sure I  
7 understand you. You're saying that I must hold an evidentiary  
8 hearing, if I were to change the current schedule that they're  
9 exercising to a week on, week off; is that correct?

10 MS. PRIMAS: Your -- Your Honor, I believe you can  
11 go -- I believe you can go back to the schedule in the decree,  
12 but I think that to change from the schedule in the decree,  
13 you would need to hold an evidentiary hearing.

14 THE COURT: But -- but it was joint physical custody  
15 in the decree, and it's joint physical custody now, which you  
16 are calling de facto primary physical custody to Mom; is that  
17 right?

18 MS. PRIMAS: Correct, Your Honor.

19 THE COURT: Okay. Thank you. Ms. Cramer?

20 MS. CRAMER: Your Honor, actually, while we were on  
21 recess I did review the case that I had referred to, Wallace,  
22 and I disagree with Ms. Primas. I believe that the Court --  
23 that this case is distinguishable from Wallace. Wallace was a  
24 case that involved a relocation, in which the Court -- both

1 parents were residing in northern Nevada, and one parent  
2 relocated, and the Court changed the custodial time share,  
3 dramatically changed the custodial time share from what it had  
4 been in Nevada into a out of state visitation plan. And in  
5 that case, the child had not even had overnights with the  
6 parent that relocated, and there were no findings of best  
7 interest. So I believe pursuant to Wallace, the Court does  
8 have the authority to modify joint custodial time share, so  
9 long as best interest factors are addressed, Your Honor.

10 THE COURT: Okay. Thank you.

11 MS. CRAMER: And, Your Honor -- forgive me, Your  
12 Honor --

13 THE COURT: That's all right. Take your time.

14 MS. CRAMER: So with -- I just wanted to follow up  
15 on some of the things that she said. So the issue with the  
16 things, the children's belongings, Dad had to drop the kids  
17 off early to Mom because she takes everything. Just because  
18 there was one message about a jacket does not mean that the  
19 entire issue has been addressed. We're talking all of the  
20 lunch box, we're talking the backpacks, we're talking about  
21 the clothes.

22 And in -- in -- I'm sure Your Honor has reviewed the  
23 filings. Ms. Reed consistently complains that the children  
24 are returned in ill-fitting, dirty clothes, and that is

1 because when Dad buys them things, and he sends them with the  
2 kids, you know, when they go back to Mom's, he never gets them  
3 back. When Mom sends the kids to him, she gives him to the --  
4 she gives them to him after she changes them out of their  
5 things, and puts them in old, ill-fitting clothes, and so Dad  
6 never gets those things back. And so he doesn't have any  
7 choice but to drop the kids off early to her, because she  
8 takes all their things, and she won't give them to Dad.

9           And this is an issue with other things, as well.  
10 Like the children's activities. She takes their uniforms, and  
11 then expects Dad to show up to the activities, but he doesn't  
12 have uniforms for the kids to participate. And this is an  
13 ongoing issue.

14           Her claim that she knows that he doesn't brush their  
15 teeth because of a message, one OFW message saying, yeah, we  
16 missed a tooth brushing does not mean that he doesn't brush  
17 their teeth ever. Just because the kids had a rough night and  
18 didn't want to brush their teeth one night, or one of them did  
19 or whatever, doesn't mean that they are running around like  
20 feral beasts in the dirt when they are with their father.  
21 That is a -- a false characterization.

22           As far as the therapy appointments go, they may have  
23 been on Monday night, but Mom was consistently excluding Dad,  
24 and that was addressed in the hearing, the fact that Dad was

1 consistently excluded from the child's therapy appointments  
2 was a problem, which is why Judge Gentile gave Dad the Monday  
3 evenings. Ms. Primas brings up the payments. She admits that  
4 my -- my -- my client made payments, and then says, oh, but he  
5 didn't make any other payments through the past year. Yes,  
6 Your Honor.

7           Because he just got this employment recently. He  
8 has been going through bouts of unemployment, and she knows  
9 this. It's very disingenuous for her to behave this way,  
10 because she knows this. We produced his unemployment stuff.  
11 We produced the -- the records showing the payments from  
12 unemployment. So she knows that he was unemployed. And, you  
13 know, that's fine.

14           If she wants to file an order to show cause and say,  
15 well, he didn't pay her because he was broke, that's fine.  
16 She can do it. And -- and I -- I would disagree with her  
17 request regarding my client's union records. We had discovery  
18 open for nearly a year, and they had every opportunity to  
19 subpoena anything they wanted from my client's union. They  
20 had every opportunity to depose my client. They had every  
21 opportunity to depose his union. And they didn't do it.

22           And so now she's trying to shoehorn -- to go on some  
23 fishing expedition. I've already said we'll turn over his W-  
24 2s. That's -- that's not a problem. But we expect the same

1 from them. And my client will absolutely disclose his W-2s  
2 for all the jobs that he managed to find, and she can see what  
3 his income was. Not a problem. And I don't see how she could  
4 possibly argue that she needs his entire tax transcript. You  
5 -- a tax return and the W-2s would show exactly what he made  
6 for 2020. So a tax transcript and all his union records,  
7 that's not her business, and it's not relevant, and it's not  
8 properly before the Court.

9 Now, as far as the video goes -- well, I already  
10 addressed that, so I'm not going to repeat myself. I believe  
11 that's all the followup I have, Your Honor.

12 THE COURT: Thank you. Ms. Primas, what's the  
13 difference between a tran -- a tax transcript and having a  
14 copy of his tax return with his W-2s?

15 MS. PRIMAS: Our concern, Your Honor, is that the  
16 tax return that Mr. Reed submitted in discovery for 2019, we  
17 don't -- we believe is a fraudulent document because it -- it  
18 indicates that he claimed the minor child, Abby. But my  
19 client claimed the minor child, Abby. So it doesn't make  
20 sense. He wouldn't have been able to do it, or both parties  
21 would have been audited.

22 So a concern is that the documents coming from --  
23 from Mr. Reed are not fraud -- are -- are fraudulent, Your  
24 Honor. So having the transcript, Your Honor, directly from



1 the IRS, which simply requires him to sign a document and then  
2 my client will send off and -- and request it. The -- I don't  
3 under -- I -- I'm not sure what is so invasive about that, if  
4 my client's willing to do that. Because it's not going to  
5 give her any more information than the real information about  
6 his -- about his income, Your Honor.

7 So that's -- that's the reason, Your Honor, is we  
8 don't trust that the documents Dad's providing are -- are true  
9 --

10 MS. CRAMER: Your Honor, she just mentioned the 2019  
11 tax return. We're not talking about 2019. We're talking  
12 about 2020.

13 THE COURT: Yeah. I heard her --

14 MS. CRAMER: So I -- I -- I don't -- I don't  
15 understand what she's even bring up a former tax return.  
16 Also, again, I will reiterate, Your Honor, discovery was open  
17 for nearly a year, and this is the first time Ms. Primas has  
18 even addressed this with me. Like, she could have deposed my  
19 client and asked him. She could have done a number of things.  
20 And now she's trying to shoehorn discovery so that her drama  
21 loving client can go dig through my client's personal  
22 business. And (indiscernible) --

23 MS. PRIMAS: Your Honor, we're trying to figure out  
24 if (indiscernible) --

1 THE COURT: Wait, wait, wait --

2 MS. CRAMER: Excuse me. I'm talking.

3 MS. PRIMAS: Oh, I apologize. I thought you were

4 done. I apologize.

5 MS. CRAMER: It's -- it's not relevant, and it's not

6 properly before the Court. And the Defendant had ample

7 opportunity to address this in discovery and chose not to.

8 THE COURT: Okay. But my -- my question --

9 MS. CRAMER: And --

10 THE COURT: Oh, go ahead. I'm sorry, Ms. Cramer.

11 MS. CRAMER: Just the last thing, Your Honor. There

12 was never a meet and confer even conducted on this issue.

13 This is the very first time I have ever heard this.

14 THE COURT: Okay. Thank you. Well, my question to

15 you, Ms. Primas, was what's the difference between getting a

16 tax -- what -- what information does a tax transcript provide

17 that a copy of a tax return with W-2s --

18 MS. PRIMAS: If -- if we had -- if we had a true and

19 correct copy of the tax return, there would be no difference.

20 All my concern is the source --

21 THE COURT: Okay.

22 MS. PRIMAS: -- is getting the document from

23 Mr. Reed versus getting the document directly from the IRS.

24 THE COURT: Okay. All right. But now you've

1 changed the reason that you were asking for it, because  
2 originally, you were asking for a tax transcript to determine  
3 -- ascertain what his actual income was, not --

4 MS. PRIMAS: Right.

5 THE COURT: -- whether or not he committed fraud in  
6 2019.

7 MS. PRIMAS: No --

8 THE COURT: We just -- we just need to know his --  
9 his income. So both parties need to file an updated financial  
10 disclosure form. And I'm not sure that W-2 forms from the tax  
11 year 2020 would provide an accurate representation of ongoing  
12 flow of income, because tax -- because the year 2020 was so  
13 bizarre due to Covid, and I think that hopefully work will  
14 become a little more steady and predictable and stable, going  
15 forward. So I would like updated financial -- I mean, you're  
16 welcome to exchange the W-2s. I can order that. Let's go  
17 ahead and order that.

18 I'm just saying I'm not sure that that's as  
19 indicative of the parties' income going forward. So -- but I  
20 do want financial disclosure forms for both parties. I'm  
21 going to bring you back for decisions on some of these things,  
22 because -- especially with the motion for order to show cause  
23 issue, because you did file that motion for order to show  
24 cause just two days after entry of the decree of divorce.

1 But I acknowledge your argument, Ms. Primas, that  
2 the -- the decree was negotiated in February, so there may  
3 have been some behavior between February and April. So I need  
4 to take a look at that a little bit closer. But I don't think  
5 that it's appropriate to -- well, I just want to take a look  
6 at it closer.

7 And then, my goodness, we've gotten so -- so many  
8 additional issues have been thrown in here today that were not  
9 raised in the papers. But I want to make sure that we -- I  
10 really want to get this right for you all, because I recognize  
11 that you've spent so much money in attorney's fees, and -- and  
12 I'm trying to follow the law, and trying to get a grasp of  
13 what happened before I became involved. It's really terrible  
14 that your case -- this particular case was pulled away from a  
15 judge who, you know, had a full grasp of what was going on. I  
16 disagree with, Your Honor, her ruling on -- obviously on that  
17 other thing, but at least you wouldn't have this reversal of  
18 the course of action she was taking, you know, midstream,  
19 because I know it's cost you all a lot of money, and that's --  
20 that's -- that's not okay.

21 All right. I -- I just -- I'm going to bring you  
22 all back. But I -- and -- oh, and also, you all brought up  
23 the issue of arrears on -- on -- on -- child support arrears.  
24 I'm not very clear on what was owed and what was paid. It's

1 my understanding that the child -- Dad was to pay \$350 a month  
2 pursuant to the decree, but now I was looking at this written  
3 order from Judge Gentile that was entered August 19, 2020,  
4 regarding the date of the hearing on May 13th, where she  
5 temporarily suspended it. So I -- and I'm just trying to  
6 follow a moving target, it seems --

7 MS. PRIMAS: Can I help, Your Honor?

8 THE COURT: Yes.

9 MS. PRIMAS: Can I help with that?

10 THE COURT: Yes, please.

11 MS. PRIMAS: So I don't believe at this point  
12 there's an issue of arrears on either side, as it relates to  
13 child support, because she did suspend the obligation so that  
14 when we came back to trial, we would look at the actual  
15 income, because Dad was laid off at that moment in time. So I  
16 think the issue only becomes child support should be paid from  
17 June, 2020, until present, but we need to figure out what the  
18 actual income was to figure out what that obligation is.

19 THE COURT: Would you agree with that, Ms. Cramer?

20 MS. CRAMER: Yes, Your Honor. What we disagreed  
21 with was that -- their argument that they had de facto primary  
22 because that was specifically not what Judge Gentile ordered.

23 THE COURT: Well, I -- I disagree that they had de  
24 facto primary. Unless you can show me specifically somewhere

1 where the judge said that, I disagree with that --

2 MS. PRIMAS: Your Honor --

3 THE COURT: -- with that -- excuse me -- with that  
4 characterization, because I am looking at the written order  
5 entered August 19, 2020, from the May 13, 2020, hearing, and  
6 the language on pages 4 and 5 does indicate that it was on a  
7 temporary basis, while Dad was unemployed, and I want to read  
8 that a little bit closer, too. There's also several things  
9 that were identified in that order that I wanted to have  
10 addressed, too. The judge also ordered on page 3 of that same  
11 order that Plaintiff Dad shall take a minimum of 20 sessions  
12 of anger management classes, which are available online, and  
13 provide proof of the same to the Court. Has that been done?

14 MS. CRAMER: Yes, Your Honor, it has been done.

15 THE COURT: Would you agree with with, Ms. Primas?

16 MS. PRIMAS: Yes, Your Honor. I believe Dad  
17 submitted proof of that. Next paragraph, on page 3 of that  
18 order, it is further ordered that Plaintiff Dad and Defendant  
19 Mom shall participate in these classes. Did that happen?

20 MS. CRAMER: They had already --

21 MS. PRIMAS: Yes --

22 MS. CRAMER: -- done the classes, I believe, before  
23 that order was even entered.

24 THE COURT: So --

1 MS. PRIMAS: Yes, Your Honor.

2 THE COURT: Okay. So they both did the ABCs of  
3 Parenting and Triple P?

4 MS. PRIMAS: Yes.

5 MS. CRAMER: Yes.

6 THE COURT: Okay. Good. Thank you. We agree on  
7 something. We're -- we're getting somewhere. All right.  
8 Then on the next page, page 4 at the top, it says that it is  
9 further ordered that Plaintiff Dad's request for sealing of  
10 the record is permitted. All that is necessary is a  
11 submission of a separate order sealing the record, but as far  
12 I know, this -- this record has not been sealed, but yet it  
13 was granted. What's the status of that order?

14 MS. CRAMER: Your Honor, I'm going to have to --  
15 again, I'm sorry. I am out of town. I will find out, and  
16 we'll get that one in, as well.

17 THE COURT: Should be a very quick, simple order  
18 sealing the record.

19 MS. CRAMER: Yes, Your Honor.

20 THE COURT: But that should have been done --

21 MS. CRAMER: I -- yes, I apologize to the Court.

22 THE COURT: All right. All right. And then it  
23 talks about -- let's see. Line six, if the Court conducts an  
24 evidentiary hearing, either party is unable to prove what is

1 being alleged -- oh, okay. That's just about attorney's fees.  
2 Oh, here is where it says Plaintiff Dad's child support shall  
3 be suspended at the present, given that he has been  
4 furloughed, and shall be suspended as of the date of the  
5 filing of his papers. So I don't know what that means. The  
6 date --

7 MS. CRAMER: I believe she was talking about the  
8 date we filed his opposition and countermotion, Your Honor.

9 THE COURT: Okay. So we -- we had a specific start  
10 time and end time to the suspension, correct?

11 MS. CRAMER: I never knew that there was an end  
12 time, and my understanding was that Judge Gentile was going to  
13 address it at the time of trial.

14 MS. PRIMAS: I agree with that.

15 THE COURT: Okay. Well, let's at least -- so at  
16 this moment, it's -- it's still suspended, correct?

17 MS. CRAMER: That's correct.

18 MS. PRIMAS: Correct.

19 THE COURT: Okay. Well, but now he's working,  
20 correct?

21 MS. CRAMER: Yes, Your Honor.

22 THE COURT: All right. I think that -- well, I mean  
23 I'll have him -- I mean, he'll -- he'll update his financial  
24 disclosure form, but we've got to get the flow of child



1 support going again, if that is indeed appropriate. But I  
2 don't know without haven't the financial disclosure form. So  
3 let's -- let's deal with that. And then -- further -- and  
4 then also, it -- that order on page 5, it states that the  
5 Court orders on a temporary basis that Mom will make the  
6 decisions as it pertains to medical, dental, psychological,  
7 educational, et cetera. So that was never revised or  
8 modified, correct?

9 MS. CRAMER: That's correct. And that was to be  
10 addressed at trial, also, Your Honor. And -- so that was part  
11 of our asking to return to the original order, or do the week  
12 on, week off, but we need to get back to that joint legal, as  
13 well.

14 THE COURT: Yes, that's something that needs to be  
15 addressed. What was -- why was it temporarily modified in  
16 that respect?

17 MS. CRAMER: Because basically it was done out of --  
18 of an abundance of caution, because the Defendant has made  
19 such extreme and outrageous allegations against the Plaintiff,  
20 that Judge Gentile made that ruling temporarily, to be  
21 cautious, and to see if Mom could actually prove her could.

22 MS. PRIMAS: That's not true, Your Honor. That is  
23 -- that is untrue. Dr. Paglini recommended that my client  
24 have sole legal custody. That is why the judge ordered it.

1 MS. CRAMER: Yeah. And it was done on a temporary  
2 basis, pending trial, where all of that would have been heard.  
3 But because we didn't get a trial, and -- because none of this  
4 was ever proven, then it should go back to joint legal. Mom  
5 has never made a case for this. It's just been these extreme  
6 allegations.

7 THE COURT: Okay. Hold --

8 MS. CRAMER: And --

9 THE COURT: -- on -- okay. All right. Thank you.  
10 I'll look at that, too. And then it says Defendant Mom may  
11 submit her order to show cause as it pertains to the alleged  
12 violations raised in her motion. And apparently that did  
13 happen, because there was an order to show cause -- well, yeah  
14 -- that was entered on June 4th, 2020. And that was based on  
15 the motion that was filed April 8, 2020. And I'm going to  
16 take a look at that, as well. Oh, my goodness. All right.

17 MS. PRIMAS: Your Honor, can I -- can I -- I just  
18 wanted to say one more thing on the child support issue, just  
19 to help Your Honor understand. The reason -- the -- I -- I'm  
20 trying to resolve the child support issue without further  
21 litigation, that's why I was asking that he produce the tax  
22 transcript or something like that, because it does go all the  
23 way back to spring of 2020, I was hopeful that if we could get  
24 true and correct copies of these documents, that I could

1 resolve with Opposing Counsel.

2           That's all -- I'm resolve something and I'd just  
3 like to make sure that we have true and correct documents in  
4 order to do that. Dad has been employed, actually, since  
5 October of 2020, pursuant to -- to some pay stubs he already  
6 has submitted. So what -- that's all, Your Honor. I was  
7 trying to make -- find something that we could resolve on our  
8 own, but we need the correct documents to do so.

9           THE COURT: Okay.

10           MS. CRAMER: Well, and I just -- my concern, Your  
11 Honor, is when we start digging into other areas that are not,  
12 you know, like as we've indicated, tax returns and W-2s that  
13 are not directly focused on that particular income issue, but  
14 when we start opening up to getting union documents, and  
15 getting IRS documents that, you know, go above and beyond, my  
16 concern is that we are dealing with a very litigious  
17 Defendant.

18           THE COURT: Yes, I understand.

19           MS. CRAMER: Okay. I've said enough.

20           THE COURT: Yeah. I've -- I -- I definitely get  
21 that sense, that Mom is litigious. I don't know that we've  
22 gone to the level of calling her a vexatious litigant. I'm  
23 not sure about this. But I must say, I would think she'd  
24 rather be putting this money that she's paying in attorney's

1 fees towards the kids college and education. But I -- she  
2 certainly is spending an awful lot in attorney's fees, and I  
3 don't really understand why.

4 MS. PRIMAS: Well, respectfully, it's because she's  
5 worried about her children's safety, Your Honor.

6 THE COURT: I --

7 MS. PRIMAS: That is why.

8 THE COURT: I understand. But -- but whether or not  
9 she has a reasonable basis for that concern is what is -- is  
10 whether or not -- is -- is what I'm struggling with. So far  
11 I'm not --

12 MS. PRIMAS: With respect to it, I do wish Your  
13 Honor was able to review Dr. Paglini's report, so you  
14 understood that, Your Honor, but I understand --

15 MS. CRAMER: Well, you know, my concern here is  
16 that, you know, we have a -- a litigant, and this has been  
17 going on for years now, Your Honor --

18 THE COURT: Yes, I know.

19 MS. CRAMER: It's not like this is a -- a month or  
20 two.

21 THE COURT: Exactly.

22 MS. CRAMER: This has been going on for years, and  
23 she claims to have all these videos and all this evidence, and  
24 she just needs to get in front of the court, and yet she has

1 not a single substantiated CPS report, not a single  
2 substantiated report to Metro. Not a single one.

3 THE COURT: Yeah. And -- and -- and just her saying  
4 her concerns doesn't mean that her concerns are reasonable,  
5 Ms. Primas, so I -- it's -- I -- I just -- I just don't get  
6 it.

7 MS. PRIMAS: I understand, Your Honor. But --

8 THE COURT: I'm looking -- I'm looking -- I'm  
9 looking, though. I'm trying -- I'm trying to understand where  
10 she's coming from. I'll look at this stuff even more  
11 carefully, but I'm -- I'm not seeing it. I think she's -- I  
12 think -- I sense and I'm not making this finding, all right?

13 My sense is that her judgment is so clouded by the  
14 filter with which she views Mr. Reed. I think her -- I think  
15 she's -- she's just got such -- such a -- a negative filter  
16 that she perceives Dad and his actions. I think it -- it  
17 guides her, and it's not -- it's not sober judgment. But I'll  
18 take a look at this. I'm not making that finding, that's just  
19 a sense that I have.

20 MS. PRIMAS: Your Honor?

21 THE COURT: Yes?

22 MS. PRIMAS: I -- I would simply request, and I -- I  
23 know you said you were going to bring us back for a ruling,  
24 which I understand. I would request that in reviewing the

1 full record, that you do review Dr. Paglini's report, so that  
2 you do understand the history of this case and -- and where  
3 Judge Gentile was coming from, because I -- I don't believe  
4 that she was just ordering the evidentiary in an abund --  
5 excuse me -- in an abundance of caution. There is a long  
6 history here, Your Honor, that -- that the parties stipulated  
7 to a custodial evaluation that --

8 THE COURT: But here's --

9 MS. PRIMAS: -- informed the Court --

10 THE COURT: But here's the part --

11 MS. PRIMAS: -- prior to Your Honor --

12 THE COURT: -- here's the problem. I don't think  
13 that it's appropriate for me to review Dr. Paglini's report  
14 because of the -- well --

15 MS. PRIMAS: Your Honor, the reason I believe it's  
16 appropriate is because had -- had -- had there not been a  
17 change in judges, or had Your Honor been on the case two years  
18 ago, you would have reviewed it, because it was a report --

19 THE COURT: Yes.

20 MS. PRIMAS: -- that the parties stipulated to, so  
21 it was presented to the Court --

22 THE COURT: Yes.

23 MS. PRIMAS: -- and the Court reviewed it in advance  
24 of the return hearing and the further proceedings. That's why