

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

ERICH M. MARTIN,

Appellant,

vs.

RAINA L. MARTIN,

Respondent.

Electronically Filed
SC NO: J1870221104:10 p.m.
DC NO: Elizabeth A. Brown
Clerk of Supreme Court

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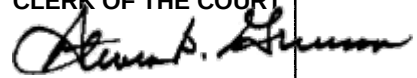
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1 **EXHS**

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

9 ERICH M. MARTIN,

10 Plaintiff,

11 vs.

12 RAINA L. MARTIN,

13 Defendant.

CASE NO.: D-15-509045-D

DEPT.: C

Date of Hearing: October 2, 2019

Time of Hearing: 10:00 a.m.

14
15
16 **APPENDIX OF EXHIBITS TO DEFENDANT'S MOTION FOR**
17 **APPOINTMENT OF A PARENTING COORDINATOR, ISSUANCE OF**
18 **A BEHAVIOR ORDER, FOR OTHER CUSTODY ORDERS AND FOR**
19 **DEFENDANT'S ATTORNEY'S FEES AND COSTS INCURRED**
20 **HEREIN, AND FOR RELATED RELIEF**

21 COMES NOW Defendant, RAINA MARTIN, by and through his
22 counsel of record Matthew H. Friedman, Esq., of the law firm of Ford &
23 Friedman and hereby files this Appendix Of Exhibits To Defendant's Motion
24 For Appointment Of A Parenting Coordinator, Issuance Of A Behavior Order,

1 For Other Custody Orders And For Defendant's Attorney's Fees And Costs
2 Incurred Herein, And For Related Relief.

3 This Appendix is filed pursuant to EDCR 5.205(d).

4 DATED this 28th day of August, 2019.

6 **FORD & FRIEDMAN**

7
8  MATTHEW H. FRIEDMAN, ESQ.

9 Nevada Bar No.: 11571

10 2200 Paseo Verde Parkway, Suite 350

11 Henderson, Nevada 89052

12 *Attorneys for Defendant*

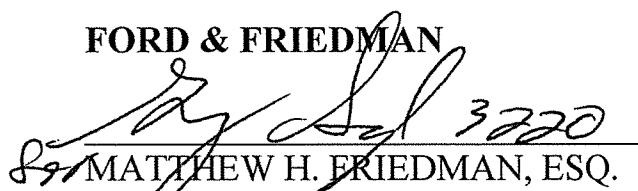
APPENDIX OF EXHIBITS

Ex.	Description	Bates No.
A.	Affidavit of Raina Martin	DFT 0001 – DFT 0005
B.	Our Family Wizard Communications memorializing text conversation between Defendant and Plaintiff's wife	DFT 0006 – DFT 0007
C.	Text message communications between Defendant and Plaintiff's wife	DFT 0008 – DFT 0078
D.	Our Family Wizard Communications between the parties concerning the minor child's eyeglasses	DFT 0079 – DFT 0084
E.	Our Family Wizard Communications between the parties concerning the minor child's dental insurance	DFT 0085 – DFT 0089
F.	Video of Defendant's Facetime call with minor child in November 2019	N/A
G.	Our Family Wizard Report of Unreimbursed Medical Expenses	DFT 0090 – DFT 0091
H.	***Declaration of Matthew H. Friedman, Esq. under <i>Brunzell v. Golden Gate Nat'l Bank</i>	DFT 0092- DFT 0095

******To be supplemented***

DATED this 28th day of August, 2019.

FORD & FRIEDMAN



MATTHEW H. FRIEDMAN, ESQ.
Nevada Bar No.: 11571
2200 Paseo Verde Parkway, Suite 350
Henderson, Nevada 89052
Attorneys for Defendant

“EXHIBIT A”

AFFIDAVIT OF RAINA MARTIN

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I attest, under penalty of perjury, that:

1. My name is Raina Martin. I am the Defendant in this matter, Eighth Judicial District Court, Family Division Case No. D-15-509045-D. I am knowledgeable of the following facts, except for those stated upon information and belief, and am able to testify in relation to such facts.
2. Plaintiff Erich Martin (hereinafter referred to as "Plaintiff") and I were married on or about April 1, 2002 in Fayetteville, North Carolina.
3. We have one (1) minor child born the issue of our marriage, to wit:
 - a. Nathan Lee Martin, born August 24, 2010, age eight (8) years; and
4. The dissolution my marriage to Plaintiff was finalized upon entry of the Decree of Divorce on or about November 5, 2015. Pursuant to our Decree of Divorce, we were granted joint legal custody of Nathan, while I was awarded primary physical custody, subject to Plaintiff's right to visitation. Plaintiff's visitation consisted of a graduated visitation schedule for Nathan's summer vacation, as follows:
 - a. 2015: Ten (10) consecutive, twenty-four (24) hour periods for the remainder of the summer;
 - b. 2016: A two (2) week block of visitation and a three (3) week block of visitations, with the two (2) week visitation exercised first;
 - c. 2017: Two (2) separate three (3) week blocks of visitation;
 - d. 2018 onward: Eight (8) consecutive weeks of visitation.
5. In addition to the summer vacation visitation, Plaintiff was also entitled to exercise monthly visitation with Nathan (set to alternate between Las Vegas and Wyoming), as well as the various holidays dedicated to him each year as outlined in our agreed upon holiday schedule. The visitation schedule contained within the Decree of Divorce was tailored in such a way that it afforded Plaintiff frequent visitation with Nathan, without interfering in Nathan's schooling and/or extracurricular activities.
6. Following entry of the Decree of Divorce, the Clark County School District modified Nathan's school schedule such that it would now be a year-round school, and Nathan was placed on "Track 5." Subsequently, the summer vacation provisions of our Decree were no longer feasible. Accordingly, On November 1, 2016, the Court issued an Order implementing a revised timeshare arrangement which addressed the issues created by the year-round school schedule. Pursuant to the Court's November 1, 2016 Order, Plaintiff would still be afforded his monthly visitation and holidays pursuant to the

Decree of Divorce. However, Plaintiff's "summer" vacation now consisted of the entirety of the first track break (a period of three (3) weeks) and the first five (5) weeks of the third track break – for a total of eight (8) weeks. Additionally, it was ordered at this time that all exchanges were to occur such that Nathan did not arrive at his destination later than 6:00 p.m. Following the 2018 school year, Nathan resumed a nine (9) month school year, which resulted in the need to revert to our prior arrangements for summer visitation. To that end, Plaintiff and I agreed that, without disturbing any of the Court's other Orders, in order to accommodate Nathan's 9 month school schedule we would resume our prior visitation agreements as provided in the Decree.

7. While I have strived to follow this Court's custodial Orders, Plaintiff has resisted at every turn such that our co-parenting relationship has been virtually non-existent. Indeed, it appears to me that Plaintiff is insistent upon negating and contravening any and all efforts I make to effectuate a cooperative, healthy co-parenting relationship. Indeed, as will be discussed below, Plaintiff's current spouse, Julie has also taken to inserting herself directly into our co-parenting relationship to such an extent that even the protections offered by "Our Family Wizard" have proven ineffective. Without immediate intervention of this Court our child will continue to suffer from the dysfunction brought by the consistent actions of Plaintiff and his spouse.
8. Julie, Plaintiff's spouse, refuses to abide by this Court's orders and instead routinely communicates directly with me both through OFW as well as directly to my cell phone. In a perfect world, such a relationship would be convenient and potentially welcomed; however, Julie persists in attacking and demeaning both me and Nathan (see attached). Indeed, the bulk of her communications do nothing to advance any legitimate co-parenting agenda, but instead seek to spurn conflict and further isolate Nathan when he is in Plaintiff's care.
9. As is evident from the attached emails and text messages, Julie routinely uses derogatory and otherwise illicit language and inflammatory commentary to describe me as well as Nathan. Plainly stated it is my understanding that Julie should not be communicating with me whatsoever. I have repeatedly requested that the Plaintiff please intercede and curtail Julie's conduct, however, the Plaintiff has continued to refuse to do so. Indeed, instead he has repeatedly advised that he "supports her" and that he will not tell her what to do. Given the volatility which exists in our relationship I cannot see why Julie should be permitted to continue to act in this manner as her actions only serve to intensify our conflict. If the Plaintiff is unwilling to address these issues with her directly, my only hope is that this Court will do so.
10. Julie has also inserted herself into the interworkings of my telephonic communication with Nathan (see video). I am uncertain why; however, it appears that Plaintiff has designated Julie as the individual responsible for "monitoring and overseeing" all of my Court Ordered telephonic communication with Nathan. The result of this has been that our communications are consistently supervised in a manner directly in violation of this Court's orders. Moreover, our calls are routinely cut short or otherwise interrupted by Julie's antics. What is perhaps the most frustrating about this process is the clear effect

that it is having on Nathan. It is obvious when speaking on the phone with him that he is uncomfortable and restricted. Indeed, on more than one occasion he has advised me that he is not free to speak and is prohibited from discussing his well-being or any of the events which may have transpired in Plaintiff's household. On the few occasions that I have been permitted to Facetime with him I have observed Nathan "mouthing" messages to me and/or using hand signals to convey information that he is either uncomfortable or prohibited from sharing with me.

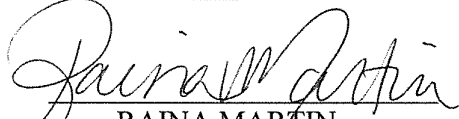
11. Pursuant to our Decree of Divorce and the present state of the Court's orders, Plaintiff is required to provide dental insurance for our son. However, in approximately March of 2019, I learned that Plaintiff had allowed this insurance to lapse or had otherwise failed to continue covering our son. Shockingly, I came to learn that this coverage had lapsed in 2017 and Plaintiff had done nothing to remedy the situation nor had he even bothered to inform me of the same. Upon learning the current status of our son's dental insurance, in March, 2019 I immediately emailed Plaintiff and requested that he provide me the current information relative to his obligation to provide dental insurance for our son. Plaintiff smugly advised me that my requests were foolish as my job within the dental industry should entitle me to obtain free dental care for our son (I am not entitled to such free care from my employer). Plaintiff further chastised me advising that his current wife is able to obtain such free care at her employer, within their home state and that, moreover, this arrangement should serve as a substitute the Court ordered insurance (see Exhibit "E")
12. Additionally, as is made evident through our "Our Family Wizard" communications and expense report, Plaintiff has plainly stated that he is unwilling to fulfill his obligations to tender payment for one-half (1/2) payment of our son's unreimbursed medical expenses, pursuant to the 30/30 rule (see Exhibit "D").
13. Although Plaintiff's refuses to acknowledge the same, I have provided reports from Nathan's optometrist indicating that Nathan has a stigmatism and requires prescription glasses. Accordingly, based upon the Optometrist's findings, I took Nathan to pick out frames and have his face fitted for the same. Given that we reside in Nevada and very seldom experience cloudy days, Nathan and I selected "transition lenses" – that would automatically shade when Nathan went outdoors. Not only did these lenses obviate the need for Nathan to carry numerous pairs of glasses, but indeed, it saved the expense of purchasing multiple pairs as well. Of note, in light of Plaintiff's protestations that "Nathan can see just fine", I have agreed for him to have Nathan seen by an Optometrist of his choosing for a second opinion. Upon Nathan's return from his recent visit with Plaintiff this summer, Nathan offered to me that, while in Colorado, Plaintiff and his wife took him to see an optometrist. While I was mildly upset that I had not received prior notice of this appointment, I was delighted to learn that Plaintiff's optometrist reaffirmed what I had been informing Plaintiff of for some time – that Nathan indeed, needs to wear glasses and his current prescription is appropriate.
14. Despite Plaintiff having been provided with multiple professional, medical opinions, I was astounded when I learned that upon his arrival in Colorado for summer vacation, Nathan had his prescription glasses taken from him by Plaintiff. Indeed, during a

Facetime video chat with Nathan, I noticed he did not have his glasses on. Upon inquiry as to why he was not wearing his glasses, Nathan subtly pointed in what I imagine was the direction of Plaintiff. Not understanding the point he was trying to make, I inquired further. In response – out of fear of speaking and getting in trouble as he often does – Nathan “mouthed” to me that Plaintiff had taken them from him because they are “hideous.” Additionally, I was informed by Nathan, that although the optometrist Plaintiff chose reaffirmed Nathan’s need to wear prescription eyeglasses, Plaintiff and his wife continued to restrict Nathan’s ability to wear his glasses regularly. It is my belief that Nathan’s well-being and bests interests should be considered, regardless of Plaintiff’s opinions concerning the aesthetics of Nathan’s eyewear.

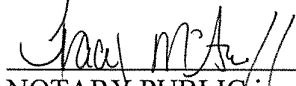
15. Pursuant to the Court’s orders Plaintiff was obligated to provide evidence of his successful completion of the Smart Start program as a result of his alcoholic issues. Indeed, this Court required that he provide proof that he was undergoing alcohol monitoring during his custodial time in order to demonstrate that such issues did not pose a risk to our son. To date, despite my repeated request for such information Plaintiff has willfully refused to provide the same.
16. During the summer of 2018, Plaintiff chose to forfeit a portion of his allowable summer visitation of eight (8) weeks, keeping Nathan for only seven (7) weeks. Again, in March of 2019, Plaintiff once more chose to forfeit his custodial time with Nathan and opted not to exercise the Spring Break visitation he was entitled to under our Decree. Naturally, given Plaintiff’s decision to voluntarily forego his custodial time, during these periods, I kept and took care of Nathan. I was astounded when it came to for Plaintiff and I to confirm the itinerary for Nathan and the summer 2019 visitation plans and Plaintiff demanded that he was entitled to, and would in fact be keeping Nathan for an additional twelve (12) days. Plaintiff stated that this was to be his “compensation” for the time he had previously voluntarily forfeited. When I objected to Plaintiff’s unilateral dictation of when such compensatory time should occur, he ignored my protestations. Moreover, Plaintiff provided me with no reasoning as to why he neglected to exercise his visitation and further ignored my requests that we work out compensatory time that would accommodate both households.

I have read the foregoing Motion for Appointment of a Parenting Coordinator, Issuance of a Behavior Order, for Other Custody Orders and for Defendant's Attorney's Fees and Costs Incurred Herein, and for Related Relief, and the factual averments contained therein are true and correct to the best of my knowledge.

Dated this 22 day of August, 2019.


RAINA MARTIN

SUBSCRIBED and SWORN to before
me this 22 day of August, 2019 by
Raina Martin.


NOTARY PUBLIC in and for the
State of NEVADA, County of Clark



“EXHIBIT B”

Message Report

The OurFamilyWizard® website
1302 2nd St NE Suite 200
Minneapolis, MN 55413
<http://www.OurFamilyWizard.com>
Info@OurFamilyWizard.com



Raina Martin generated this report on 06/08/19 at 12:19 PM. All times are listed in America/Los_Angeles timezone.

Message: 1 of 1
Date: 11/29/2017 7:10 PM
From: Raina Martin
To: Erich Martin (First View: 11/29/2017 7:21 PM)
Subject: Messages from Julie

You are absolutely the nastiest piece of trash I have ever encountered. The way you behave and the things you say, your lies are incredible. Poor Nathan to have you for a mom. He is going to be a wreck for the rest of his life because of you. He already struggles in every way because you are an absent uninvolved mom who only hands him an iPad. Nathan says you almost never even have dinner together. He is a mess socially and it was noticed 2 years ago during Thanksgiving by every adult and child of 13 families that attended the soccer tournament and their extended families. Remember the email sent in regards to that. Nathan doesn't get bullied and attacked he is the bully! I remember the 1st time I met him he was 4 in preschool and in trouble for hitting and misbehaving. You have not taught him anything he still hits at school and you call it playing. Who are you kidding? He needed speech years ago but no you talk to him like a baby and so he lisps and is barely understandable. His gross motor skills are so far behind because an iPad doesn't develop them. He struggles with his fine motor skills look at his handwriting, he struggles eating and controlling his fork or spoon. Do you still feed him too? You have never thought him to be independent so that given the need he is aware of his surroundings and can be safe. You hold his hand everywhere he goes so that he doesn't learn to look around him for dangers. He can't even chew with his mouth closed. So what are you doing as a mom? You don't play with him or he would know how to play. He lies worse than you do. And that is all the time. So the reason he gets in trouble when other kids don't is because the other kids know how to behave, tell the truth, and socially don't drive everyone crazy. NATHAN DRIVES EVERYONE CRAZY.

No wonder he had to change schools. He has been in more trouble in 3 yrs of school than all 5 of mine combined over 18 years. Erich actually parents him. He is an amazing dad. If he could live with us full time he may have a chance. You think you know Erich. You have no clue. You were a horrid spouse, you are fake and manipulative. As I said the biggest piece of trash I have ever known. Next time we are in Vegas i will walk into your work and tell your boss how you obstructed a writ that could have had him held in contempt of court you and your office manager lied to the constable. Your cop bf/ ex husband lied as well and helped with the obstruction. You make coparenting a nightmare and if you want me to love and care for Nate you should back off because with all of the shit and drama revolving around you makes it hard and then he opens his mouth and lies and proves he has been manipulated by you...He is not ever going to trust or be normal if you continue to program him this way. You grill him every ft then interrogate him for days after returning until he

lies and twists everything to your satisfaction. You are the worst mom in the world. You want to blame an affair by Erich on the end of your marriage. You would be together otherwise...Hell no! Your ugly heart and lies ended that marriage. You gave him a reason to cheat and if you think he lies and you were so awesome as a wife. I have dealt with you for 3 years now and you are absolutely the worst person I know. How Tony deals with you and how he goes along with the way you treat Nathan is beyond me. I wish him luck. No-one in their right mind would stay married to you. Your nastiness and dark heart shows through in your countenance and makes you grotesque. You are ruining your son. Wake up!! For Nathan's sake he has no hope otherwise. Every visit is followed by emails ripping on Erich and bringing up a marriage that ended 2010 or before even if you schemed to keep it legal in order to get his retirement you do not deserve. You have some nerve and no integrity. And it's not my house. It is Erich's home. And he pays his own bills. You are the mooch!

Did you know Nate calls kids at school ball sack? And stupid? And flips them off? What a great kid with great parenting.

Oh I know. He told me everything he has changed... but you....you are trash and I would have cheated too if I had to live with you.

DFT 0006

RA000774

You cheated with Tony! He was married when he met you! And so were you...You are a hoar! You would go to Texas to visit an" ex" while he was deployed.

Nate will be kicked out of every school He attends at this rate and that is all on you

These are all messages from Julie, your wife.

Raina

“EXHIBIT C”



Julie >

You are absolutely the nastiest piece of trash I have ever encountered. The way you behave and the things you say, your lies are incredible. Poor Nathan to have you for a mom. He is going to be a wreck for the rest of his life because of you. He already struggles in every way because you are an absent uninvolved mom who only hands him an iPad. Nathan says you almost never even have dinner together. He is a mess socially and it was noticed 2 years ago during Thanksgiving by every adult and child of 13 families that attended the soccer tournament and their extended families. Remember the email sent in regards to that. Nathan



Text Message





Julie >

extended families.
Remember the email sent in regards to that. Nathan doesn't get bullied and attacked he is the bully! I remember the 1st time I met him he was 4 in preschool and in trouble for hitting and misbehaving. You have not taught him anything he still hits at school and you call it playing. Who are you kidding? He needed speech years ago but no you talk to him like a baby and so he lisps and is barely understandable. His gross motor skills are so far behind because an iPad doesn't develop them. He struggles with his fine motor skills look at his handwriting, he struggles eating and controlling his fork or spoon. Do you still feed him too? You have never thought him



Text Message





Julie >

controlling his fork or spoon. Do you still feed him too? You have never thought him to be independent so that given the need he is aware of his surroundings and can be safe. You hold his hand everywhere he goes so that he doesn't learn to look around him for dangers. He can't even chew with his mouth closed. So what are you doing as a mom? You don't play with him or he would know how to play. He lies worse than you do. And that is all the time. So the reason he gets in trouble when other kids don't is because the other kids know how to behave, tell the truth, and socially don't drive everyone crazy. NATHAN DRIVES EVERYONE CRAZY. No wonder he had to change schools. He has



Text Message





Julie▼



audio



FaceTime



info

how to behave, tell the truth,
and socially don't drive
everyone crazy. NATHAN
DRIVES EVERYONE
CRAZY. No wonder he had
to change schools. He has
been in more trouble in 3 yrs
of school than all 5 of mine
combined over 18 years.
Erich actually parents him.
He is an amazing dad.

If he could live with us full
time he may have a chance.
You think you know Erich.
You have no clue. You were a
horrid spouse, you are fake
and manipulative. As I said
the biggest piece of trash I
have ever known. Next time
we are in Vegas i will walk
into your work and tell your
boss how you obstructed a
writ that could have had him



Text Message





Julie >

he is an amazing dad.

If he could live with us full time he may have a chance. You think you know Erich. You have no clue. You were a horrid spouse, you are fake and manipulative. As I said the biggest piece of trash I have ever known. Next time we are in Vegas i will walk into your work and tell your boss how you obstructed a writ that could have had him held in contempt of court you and your office manager lied to the constable. Your cop bf/ ex husband lied as well and helped with the obstruction. You make coparenting a nightmare and if you want me to love and care for Nate you should back off because with all of the shit and drama revolving around you makes it hard and then he opens his mouth



Text Message





Julie >

coparenting a nightmare and if you want me to love and care for Nate you should back off because with all of the shit and drama revolving around you makes it hard and then he opens his mouth and lies and proves he has been manipulated by you...He is not ever going to trust or be normal if you continue to program him this way. You grill him every ft then interrogate him for days after returning until he lies and twists everything to your satisfaction. You are the worst mom in the world. You want to blame an affair by Erich on the end of your marriage. You would be together otherwise...Hell no! Your ugly heart and lies ended that marriage. You gave him a reason to cheat and if you think he lies and



Text Message





Julie >

marriage. you would be together otherwise...Hell no! Your ugly heart and lies ended that marriage. You gave him a reason to cheat and if you think he lies and you were so awesome as a wife. I have dealt with you for 3 years now and you are absolutely the worst person I know. How Tony deals with you and how he goes along with the way you treat Nathan is beyond me. I wish him luck. No-one in their right mind would stay married to you. Your nastiness and dark heart shows through in your countenance and makes you grotesque. You are ruining your son. Wake up!! For Nathan's sake he has no hope otherwise. Every visit is followed by emails ripping on Erich and bringing up a



Text Message





Julie >

shows through in your countenance and makes you grotesque. You are ruining your son. Wake up!! For Nathan's sake he has no hope otherwise. Every visit is followed by emails ripping on Erich and bringing up a marriage that ended 2010 or before even if you schemed to keep it legal in order to get his retirement you do not deserve. You have some nerve and no integrity. And it's not my house. It is Erich's home. And he pays his own bills. You are the mooch!

us for a year. He's not who he seems to be- he's who you want him to be. The army made a perfect soldier.

He implied that you knew everything. You knew long before my husband did. In that way he was better than I. I still can't believe he



Text Message





Julie >

to be. The army made a perfect soldier.

He implied that you knew everything. You knew long before my husband did. In that way he was better than I. I still can't believe he tried to meet up while you were home pregnant. (I didn't know you were pregnant)



We were in marriage counseling and I was

You have no clue Julie.

Did you know Nate calls kids at school ball sack? And stupid? And flips them off? What a great kid with great parenting.

Oh I know. He told me everything he has changed... but you....you are trash and I would have cheated too if I had to live with you.



Text Message





Julie >

stupid? And flips them off?
What a great kid with great
parenting.

Oh I know. He told me
everything he has changed...
but you....you are trash and I
would have cheated too if I
had to live with you.

Okay. Don't text me.

You cheated with Tony! He
was married when he met
you! And so were you...You
are a hoar! You would go to
Texas to visit an" ex" while
he was deployed.

No- you have no clue. Stop
texting me.

I will text or email or ofw you
anytime I want. You are
horrible like nothing I have
ever heard of or seen.



Text Message





Julie >

are a fool. You would go to Texas to visit an "ex" while he was deployed.

No- you have no clue. Stop texting me.

I will text or email or ofw you anytime I want. You are horrible like nothing I have ever heard of or seen. Nathan is a mess because of you.

Okay.

Nate will be kicked out of every school He attends at this rate and that is all on you

Okay

Get it together!

Okay



Text Message



10:39



Julie >

you

Okay

Get it together!

Okay

You everything wrong raising Nate.

Okay.

Real mature I would expect nothing less. You are a wretch of a person Raina. We welcomed Nate into our family and you are making it impossible. Your boss

will hear from me very soon. I hope you and your co-worker get fired.

Julie you may contact whomever you like- I have nothing to hide. However



Text Message



DFT 0019

RA000788



Julie >

welcomed Nate into our family and you are making it impossible. Your boss

will hear from me very soon. I hope you and your co-worker get fired.

Julie you may contact whomever you like- I have nothing to hide. However, defamation is a crime in Nevada just telling you that for your own good.

You lied to her in those messages. Your marriage was over before you got pregnant. You treated him like crap and there was already nonhop so don't act li

ke poor me I was pregnant and my husband wanted to cheat on me. You were never going to stay married and



Text Message





Julie >

already nonnop so don't act
li

ke poor me I was pregnant
and my husband wanted to
cheat on me. You were never
going to stay married and
you know it. He did the right
thing by telling y

ou give him a little credit. But
long before that the
marriage was never going to
make it. That's why you went
out and met Tony and you
know it.

Oh ok nice try.... so is
obstruction. And fraud to
gain insurance...you are also
guilty of defaming Erich. So
bring it on. I guarantee I will
contact you

r boss very soon

Don't threaten me. I have far
more on you than you know.



Text Message





Julie >

guilty of defaming Erich. So
bring it on. I guarantee I will
contact you

r boss very soon

Don't threaten me. I have far
more on you than you know.
Btw why didn't you bother to
pick Nate up on Sunday?
Didn't you miss him and
want to see him?

I'm glad you are putting
those in ofw. They are the
truth and will only allow the
Judge to see you for
whonyou are and what you
do. I want her to know yo

to make him not like his dad.
Thatbis your worst crime
and i have everything he
says documented.
Everything he says you tell
him. This way we have a
case



Text Message





Julie >

do. I want her to know yo
to make him not like his dad.
Thatbis your worst crime
and i have everything he
says documented.
Everything he says you tell
him. This way we have a
case

u are not being a good mom.
She needs to know Nate
struggles constantly at
school and you excuse it
away. The court needs to
know you lie to him and try

to have Nate come live with
us.

Jun 11, 2018, 8:20 PM

You need to know that
Nathan didn't want to call
you tonight. I told him that
was not ok and made him
call you. Then he said well



Text Message





Julie >

Jun 11, 2018, 8:20 PM

You need to know that Nathan didn't want to call you tonight. I told him that was not ok and made him call you. Then he said well I'm going to tell my mo

m that i dont want to talk tomorrow night. I said no you have you talk to your mom. If you tell her you don't want to she is going to think we are tellin

ea. I have told him every night that he needs to talk to you even when he doesn't want to. You trap him in his words trying to make us look bad. Try to h

g you to say that so you just need to talk to her. He then thought it would be ok to tell you and try to explain you it



Text Message





Julie >

was trying to make us look
bad. Try to h

g you to say that so you just
need to talk to her. He then
thought it would be ok to tell
you and try to explain you it
isn't my idea that it was his
id

onor what he wants. It's not
coming from us. Stop trying
to catch us doing something
wrong and just leave us
alone. Nathan is fine. He is
having more fun

and spending more quality
time with his dad that you do
with him in 6 months.

You are a women of God?
Did you go to church on
Sunday and participate in
the women's group and
discuss how to deal with
people attacking you?



Text Message





Julie >

You are a women or God?
Did you go to church on
Sunday and participate in
the women's group and
discuss how to deal with
people attacking you?

Get real Raina

Exactly.

Always a victim. You are a
bully

How am I the bully Julie?

Sprint

8:48 PM

17%



Julie



with him or he would
know how to play. He
lies worse than you do.
And that is all the time.
So the reason he gets in
trouble when other kids
don't is because the
other kids know how to
behave, tell the truth,
and socially don't drive
everyone crazy.
NATHAN DRIVES
EVERYONE



Text Message





Julie >

trouble when other kids
don't is because the
other kids know how to
behave, tell the truth,
and socially don't drive
everyone crazy.
NATHAN DRIVES
EVERYONE
CRAZY. No wonder he
had to change schools.
He has been in more

**These are kinda words -
calling me trash is loving as
God would? When have I
called you trash or attacked
your children?**

**You just are and You know it.
You need help. I am not
going to get into a texting
battle with you.**

**I am in the process of
contacting yours and Erich's
Bishop. There's no need to
battle Julie- I have never
participated in your hatred,
ever.**



Text Message





Julie >

Bishop. There's no need to battle Julie- I have never participated in your hatred, ever.

Don't talk to me about religion/ God...you are as evil as they come. You need control and you cant control me!!! Your child is struggling because of you

. It isn't his fault it is yours. I didn't attack him. It is You that makes his life hard and ours as well. He would be an entirely different kid if you

out you already. I have never experienced such hatred and lunatic behavior until you. Tell yourself what you want. Tell whoever you want. I don't care. Yo

weren't his mom. Lol....My bishop is my good friend and



Text Message





Julie >

out you already. I have never experienced such hatred and lunatic behavior until you. Tell yourself what you want. Tell whoever you want. I don't care. Yo

weren't his mom. Lol....My bishop is my good friend and his wife and I hang out. My oldest and his oldest are best friends...So go for it he knows all ab

u just look like a crazy fool to everyone. Everyone sees through you and before long your son will too. @

You are cruel and hope you have to face God one day. I am providing every ounce of proof I have on everything along with all the emails and text messages and the truth behind Erich. You bash me and attack rather than talk



Text Message





Julie >

your son will too. @

You are cruel and hope you have to face God one day. I am providing every ounce of proof I have on everything along with all the emails and text messages and the truth behind Erich. You bash me and attack rather than talk and lead in the ways of God. I'm not sure they know how cruel you are. My son is amazing and always has been.

They're not going to get involved in this Rayna

I am in the process of converting and from what I have been told, it needs to be discussed with your bishop. It won't be tomorrow, but it's coming. You both don't practice what



Text Message



10:40



Julie >

They're not going to get involved in this Rayna

I am in the process of converting and from what I have been told, it needs to be discussed with your bishop. It won't be tomorrow, but it's coming. You both don't practice what I have been taught by the church.

Wow because we don't tolerate a bully trying to control our family. Okay. I hope you do convert. It would be good for Nathan. Erich's past and his truth

was over long ago. The bishop will not allow you to air his sins only yours. He won't even listen. So good luck with your threats. They



Text Message



DFT 0031

RA000800



Julie >

nope you do convert. it
would be good for Nathan.
Erich's past and his truth

was over long ago. The
bishop will not allow you to
air his sins only yours. He
won't even listen. So good
luck with your threats. They
won't control us

or scare us or change us.
Leave us alone. We have
grown tired of you

They're not threats Julie-
quit attacking me and my
child. I'm a great mother and
I was always there - I was- I
honored my vows, I honor
my God, and I don't go
around bashing people.

And he can air my sins
(which I am not sure what
they are - and if they're lies-
I'll clear that up) but I can



Text Message





JC

Julie >

child. I'm a great mother and I was always there - I was- I honored my vows, I honor my God, and I don't go around bashing people.

And he can air my sins (which I am not sure what they are - and if they're lies- I'll clear that up) but I can discuss his sins? That's odd, don't you think?

Liar. That is all you do.

That's all you say- about what?

You understand I have proof, right? I have proof that I am not the liar and what really happened, right?

He did not air your sins. But everyone knows what a crazy person you are. And as far as his sins go. He



Text Message





JC

Julie >

You understand I have proof, right? I have proof that I am not the liar and what really happened, right?

He did not air your sins. But everyone knows what a crazy person you are. And as far as his sins go. He repented of his sins! They were wiped clean when

over. He has moved on it is time you do too. No one cares anymore except you. Part of the church and converting is to forgive. So maybe you should try th

he was baptized a member of the church. And disliking you and your control is not a sin. Proof of What?

Whatever happened in your marriage? That is long

at route and move past your



Text Message





Julie >

Part of the church and
converting is to forgive. So
maybe you should try th

he was baptized a member
of the church. And disliking
you and your control is not a
sin. Proof of What?

Whatever happened in your
marriage? That is long

at route and move past your
failed marriage. No one
cares about his past. Only
you do....that is truly crazy!

That's very ironic
considering you constantly
call me names- and a child.

I will have my chance to
show him my truth then. I do
not like lies and attacks
about me while another
person lies to make
themselves look better- that
is not Godly or forgiveness.



Text Message





Julie >

considering you constantly
call me names- and a child.

I will have my chance to
show him my truth then. I do
not like lies and attacks
about me while another
person lies to make
themselves look better- that
is not Godly or forgiveness.

That is not how it works hun.
Are you seriously hoping to
ruin his reputation or get him
in trouble? Are you seeking
to have him disciplined for
something in the past? That
is psycho and It doesn't work
that way. He has repented
and paid the price for his
sins. the mormon church
know what his sins were and
God has forgiven him and he
lives a good clean life. If you
have an issue with the past
they will counsel you to let it



Text Message





Julie >

is psycho and It doesn't work that way. He has repented and paid the price for his sins. the mormon church know what his sins were and God has forgiven him and he lives a good clean life. If you have an issue with the past they will counsel you to let it go. If your issue is with us and our family...if you want an amicable coparent situation...try leaving us alone. Let us be Nates parent without you being involved when it is our time. Stop interffering with our time with Nathan. Stop trying to find things we do wrong every second of the day. Stop harassing us and stop grilling Nate then twisting his words to make us look bad. It is exhausting. You are crazy and manipulative. Hold on to your proof from



Text Message





Julie >

find things we do wrong every second of the day. Stop harassing us and stop grilling Nate then twisting his words to make us look bad. It is exhausting. You are crazy and manipulative. Hold on to your proof from your marriage because No one cares. I certainly don't, Erich definitely doesn't and anyone you try to tell at this point will see through you and they don't care either. Your marriage is over!!! He is with me and this family loves the man he us. We are happy beyond words. If we had the money we would sue you for full custody of Nathan because I know he would be better off with us. You are a nightmare to deal with.

Then tell me how I'm the



Text Message





Julie >

because I know he would be better off with us. You are a nightmare to deal with.

Then tell me how I'm the bully? How you call me trash and a bad mother? Who is "everyone" when you say "But everyone knows what a crazy person you are." Last I checked, Erich is the one who no longer has friends from his past or family.

I am not looking for anything other than making all the name calling and attacking my child stop. That's all.

He is and always has been an amazing kid.

You have no idea...you think you do but you have got it wrong. Nate struggles he always has since the day I



Text Message



10:41



Julie >

my child stop. That's all.

He is and always has been
an amazing kid.

You have no idea...you think
you do but you have got it
wrong. Nate struggles he
always has since the day I
met him and he was in
trouble in preschool...

he still gets in trouble. but
like I said it isn't his fault it is
yours. So we are working
with Nate to in do your
damage and it has made a
difference.

Hopefully one day it will
stick.

He never had ANY "issues"
until he stayed with you. I
even have an email saying
how much you enjoy Nathan
and well behaved he was



Text Message



DFT 0040

RA000809



Julie >

He never had ANY "issues" until he stayed with you. I even have an email saying how much you enjoy Nathan and well behaved he was when you first met him. He never had issues in preschool- it all started in kindergartenwhen you came into the picture- but you don't see me calling you names or bashing your parenting skills. You look to point a finger so quickly. He's a lot like Erich. Erich's nickname in high school was Goob- and in Goober. Nathan is a goofy, fun, smart, and kind child.

How am I the problem when he is always with You? He was in trouble at preschool the day Erich and I picked him up. For hitting and



Text Message





Julie >

and kind child.

How am I the problem when he is always with You? He was in trouble at preschool the day Erich and I picked him up. For hitting and saying a swear word.

None of my kids have ever remotely been in trouble at school. All 5 kids and not once have I had to meet with a single teacher for a discipline problem.

ccer in 2 weeks including Stanford and ucla and she isn't even in highschool yet. She is on a farm team for the us womens national team. She has straight

There is no special discipline plan at school for anyone of My kids. My kids excel at everything they do. My kids 20 colleges coming



Text Message





Julie >

She is on a team for the
us womens national team.
She has straight

There is no special
discipline plan at school for
anyone of My kids. My kids
excel at everything they do.
Kk has 20 colleges coming
to watch her at so

t because he comes here. It
is because he lives there.
Here he learns not to lie. He
learns how to be active and
socialize. When you have
him all the tim

As and her teachers all love
her. Makahl and Dylan are all
the same way. Kara
graduated with honors from
ASU and has been
published. Trust me it is no

e and he is always in trouble
we are not the problem. You
are...@



Text Message





Julie >

As and her teachers all love her. Makahl and Dylan are all the same way. Kara graduated with honors from ASU and has been published. Trust me it is no e and he is always in trouble we are not the problem. You are...@

So why is Nathan stuck in a car reading a book while your child/children is playing league soccer and have their own beds?

And didn't you say that Dylan had issue behavior and that you all had to work on "positive reinforcement" because he struggled emotionally after your (second) divorce?

Why do you think you're so



Text Message



10:41



Julie >

And didn't you say that Dylan had issue behavior and that you all had to work on "positive reinforcement" because he struggled emotionally after your (second) divorce?

Why do you think you're so much better then everyone? Nathan never had any issues until he started going there and you know it but don't want to address it. That's fine. I have plenty of proof of that too.

Or was that Tyler that had the issues that you don't even mention in your last text?

No Tyler struggled right at first for about 6 months when I moved to

colorado for very short



Text Message



DFT 0045

RA000814



Julie >

text?

No Tyler struggled right at first for about 6 months when I moved to colorado....for a very short time. Who cares about proof of anything? Why are you so

hung up on proof? Nate has always had issues with you and the age it became obvious such as preschool when he had to interact with people is when I ha

ppened to come in to his life. I have not been around him enough to have the kind of influence you say I do. He hits people in the face with his lunch b

ox not because of me but because of your lack of parenting.

Tyler is great he is engaged



Text Message





Julie >

influence you say I do. He
hits people in the face with
his lunch b

ox not because of me but
because of your lack of
parenting.

Tyler is great he us engaged
and about to get married to
his highschool sweetheart.
He flies drones for the
military and is sucessful.

Again, why isn't Nathan
enrolled in sports or have his
own space or treated like
one of your own?

Raina nate has his own bed
too. And begs to sleep with
Makahl and Dylan. Kk is at
the end of a 10 month
season. How is Nate
supposed to be on a team



Text Message





Julie >

one of your own?

Raina nate has his own bed too. And begs to sleep with Makahl and Dylan. Kk is at the end of a 10 month season. How is Nate supposed to be on a team when

soccer ended on memorial weekend for everyone his age. Baseball started in April and ends in 3 weeks. He can't do a team sport here he is going back and

forth between Colorado and Texas no team will take a kid for only 3 weeks. I work and can't take him to a sport camp from 10am to noon and he isn't here

long enough to even finish that. So Nathan gets to go to



Text Message





Julie >

forth between Colorado and Texas no team will take a kid for only 3 weeks. I work and can't take him to a sport camp from 10am to noon and he isn't here

long enough to even finish that. So Nathan gets to go to the pool alot and play sports with my kids and Erich during the day. A team sport is not possi

ble you are a fool and know nothing if you think otherwise. I can tell you is is more fit after 3 weeks here than he has ever been living with you. He ha

s more confidence too! I'd say he is better off.@

Wow. Glad to see your kids are more important and yet you still find a way to shame



Text Message





Julie >

more fit after 3 weeks here
than he has ever been living
with you. He ha

s more confidence too! I'd
say he is better off.@

Wow. Glad to see your kids
are more important and yet
you still find a way to shame
me as a mother. Well done
Julie. Have a great night and
I'll pray for you.

ut Nathan does not want
that room. He has his own
dresser and half the closet.
Again you know nothing!!

The boys share a room Raina
most kids I know do that. We
don't have enough
bedrooms for everyone to
have their own room. We
have a room in the basement
b



Text Message





Julie >

The boys share a room Raina
most kids I know do that. We
don't have enough
bedrooms for everyone to
have their own room. We
have a room in the basement
b

He shares a private
bathroom with Dylan. Dylan
spends every other week
with his dad sobit is all
Nathan's every other week.

Please don't I don't need
your evil in my life. I will pray
for Nathan that he will be ok
with you when he goes back.
How about that?

My evil? Again- I continue
to ask you but nothing-
what's my evil Julie?

My kids live here. Nathan
isn't here long enough are



Text Message





Julie >

your evil in my life. I will pray
for Nathan that he will be ok
with you when he goes back.
How about that?

My evil? Again- I continue
to ask you but nothing-
what's my evil Julie?

My kids live here. Nathan
isn't here long enough are
you stupid? Find a team that
will take him for 3 weeks and
I will put him on it.

Manipulation, harassment,
lies...controlling and trying
to defame Erich.
Programming Nathan
against us. Ruining your son
and blaming us...i could list f
or days but I am done here
you aren't worth another
second of my time.

None of that is true so now



Text Message





Julie >

lies...controlling and trying
to defame Erich.
Programming Nathan
against us. Ruining your son
and blaming us...i could list f

or days but I am done here
you aren't worth another
second of my time.

None of that is true, so now
what?

It is all true...leave us alone
you are insane.

That solves it. Let's continue
this for 11 more years! Way
to work together.

Leave us alone and we will
be fine. Get of the helicopter
ride with Nate and we will be
fine. Stop calling Erich's
boss like a crazy person
trying to con



Text Message





Julie >

this for 11 more years! Way
to work together.

Leave us alone and we will
be fine. Get of the helicopter
ride with Nate and we will be
fine. Stop calling Erich's
boss like a crazy person
trying to con

trol him and we will be fine.
Let go and realize we can't
be controlled and we will be
fine. Stop looking for ways to
make us look bad every
chance you g

e not part of it. Realize that
and we will be fine.

et we will be fine. Stop the
lies and we will be fine. You
brought this nightmare on
yourself. This is my life and
my family Erich is My
husband...you ar



Text Message





Julie >

...not part of it realize that
and we will be fine.

et we will be fine. Stop the
lies and we will be fine. You
brought this nightmare on
yourself. This is my life and
my family Erich is My
husband...you ar

Julie - get over this whole
"he's my husband". I don't
care about your marriage -
I'm happy for you two. Get
off it- I care about the
constant name calling and
attacking and treating my
son differently. That's all.

What lies?

Your son is different. He has
to learn things that you have
failed to teach him when he
was 3 and 4...there is alot for
him to learn.... He comes for
8 w



Text Message



10:42



Julie >

constant name calling and attacking and treating my son differently. That's all.

What lies?

Your son is different. He has to learn things that you have failed to teach him when he was 3 and 4...there is a lot for him to learn.... He comes for 8 w

is time here will be different than if he actually lived here full time.

ent it is the reality of the situation. Unfortunately since you chose to live in Las Vegas when his dad did not that is the reality of Nathan's visits. H

solid weeks in one place. If my kids had a few weeks here and a few weeks somewhere else they



Text Message



DFT 0056

RA000825



Julie >

that is the reality of Nathan's visits. H

solid weeks in one place. If my kids had a few weeks here and a few weeks somewhere else they wouldn't join a team either. It is not preferential treatm

eeeks in the summer and this summer is unique because of Erich living in 2 places. Next summer will be better. More opportunities for sure. He will have 8

Seriously Julie? Again, he's just like Erich. There is nothing wrong with Nathan other than some serious emotional issues from not having a dad for 4 years to being shoved on the floor in a strangers house with his blanket ripped from him at 5 and being told that he



Text Message





Julie >

He will have 8

Seriously Julie? Again, he's just like Erich. There is nothing wrong with Nathan other than some serious emotional issues from not having a dad for 4 years to being shoved on the floor in a strangers house with his blanket ripped from him at 5 and being told that he "drives everyone crazy" and is constantly beat down.

If you honestly want to just sit here and continually call me a bad mother while Nathan sits in a car and read books or go to the pool and has to play while your kids are in elite sports and are given every opportunity during their summer this is will never end.



Text Message



10:42



Julie >

and being told that he
"drives everyone crazy" and
is constantly beat down.

If you honestly want to just
sit here and continually call
me a bad mother while
Nathan sits in a car and read
books or go to the pool and
has to play while your kids
are in elite sports and are
given every opportunity
during their summer this is
will never end.

Whatever makes you feel
better, Julie.

e closer to his father.

If you want Nathan to have
the same opportunities that
my kids do move here.
Nathan would be better with
both parents living near by.
Erich can not move



Text Message



DFT 0059

RA000828

10:42



Julie >

Whatever makes you feel better, Julie.

e closer to his father.

If you want Nathan to have the same opportunities that my kids do move here. Nathan would be better with both parents living near by. Erich can not move

to Las Vegas because the rest of his family can't move there but since you have no actual legal ties to Las Vegas why don't you put Nathan first and mov

And this was Erich Home of record that he claimed on his taxes even years after our divorce. This is where Erich said he'd end up and I have dozens of emails stating that.



Text Message





Julie >

why don't you put Nathan
first and mov

And this was Erich Home of
record that he claimed on his
taxes even years after our
divorce. This is where Erich
said he'd end up and I have
dozens of emails stating
that.

Plus, Erich lives in Texas.

do the pool. You are foolish
Nate would have to live here
to do that. How can you not
get that through your head.

My kids don't play elite
sports in the summer. Kk has
1 tournament left and her
season is over. Dylan is 2.5
weeks until the end of
baseball then we just

Your divorce was 2015....not
many years ago!!!



Text Message





Julie >

get that through your head.

My kids don't play elite sports in the summer. Kk has 1 tournament left and her season is over. Dylan is 2.5 weeks until the end of baseball then we just

Your divorce was 2015....not many years ago!!!

He is in the military he can't choose where he ends up for another year...And maybe when you were married he could retire there but not now life changed

he is remarried . You moved so you could be with your boyfriend. You moved because you were selfish. You were willing to live in a different state from

2010 until 2019 without your husband how was that



Text Message





Julie >

could retire there but not
now life changed

he is remarried . You moved
so you could be with your
boyfriend. You moved
because you were selfish.
You were willing to live in a
different state from

2010 until 2019 without
your husband how was that
supposed to work for him...
and in 2011 you moved in
with another guy.....2015
finally got divorced an

ou. How dare you blame
Erich.

tate Erich worked when not
deployed. So stop trying to
put this on Erich. He served
his country and you moved
away making it hard for
him... that is on y

d claim 10 yrs married? You



Text Message





Julie >

Erich.

tate Erich worked when not deployed. So stop trying to put this on Erich. He served his country and you moved away making it hard for him... that is on y

d claim 10 yrs married? You are dishonest and selfish. Erich was deployed most of the 1st 4 years and lived in another state for the first 4 years of Nat

han's life. He was there for Nate as much as he could be. It is on you for not making it easier for Erich to see Nathan for example staying in the same s

Erich lives in both places. He is there week days and here weekends and takes leave to extend time. The second he



Text Message





Julie >

be. It is on you for not
making it easier for Erich to
see Nathan for example
staying in the same s

Erich lives in both places. He
is there week days and here
weekends and takes leave to
extend time. The second he
is retired he is back here
permanently.

This is his home there is no
doubt about that.

2015 is the last year he
claimed Las Vegas that is
the year of your divorce..
nice try

You have been lied to so
much Julie. I moved to go to
school and lived with my
father- Erich took voluntary
deployments and acquired a
drinking/porn/sex problem.
You were never married to



Text Message





Julie >

You have been lied to so much Julie. I moved to go to school and lived with my father- Erich took voluntary deployments and acquired a drinking/porn/sex problem. You were never married to the active deployment Erich and have obviously never been told the truth about a lot. I get that, but stop being angry and me and Nathan.

Just so you know, I didn't "move" to Vegas until July 2012.

they were all voluntary I would have left You too... You could have gone to school anywhere...have some integrity and take ownership in some if it. the

I have heard the truth. But I also can imagine what it



Text Message





Julie >

would have left You too...
You could have gone to
school anywhere...have
some integrity and take
ownership in some if it. the

I have heard the truth. But I
also can imagine what it
must have been like to be
married to you. I don't blame
him for anything he may
have done. Even if

military doesnt have
voluntary deployments. You
may want to believe that. He
may have had some say or
choice at times but being
married to you he needed

the extra money to support
you and your lifestyle. So he
really had no choice. He put
his life on the line alot and
you were/ are so ungrateful.
Raina yo

u sent him born you are so



Text Message





Julie >

the extra money to support you and your lifestyle. So he really had no choice. He put his life on the line alot and you were/ are so ungrateful. Raina yo

u sent him porn you are so ridiculous...as far as alcohol. He struggled with alot from his job to a horrible wife so he drank can you blame him...you dri

nk now but he hasn't had any alcohol, coffee, or even tea nothing for over 2 years so get over that.

Officially early 2012 your are right...

And within 6 months you lived with Tony

So do what is best for Nate anf mive back. Stop blaming Erich for Nate's priblems and



Text Message





Julie >

Officially early 2012 your are
right...

And within 6 months you
lived with Tony

So do what is best for Nate
anf mive back. Stop blaming
Erich for Nate's priblems and
do something, sacrifice for
your son and move back.

No Julie- on so much of it.
You are so angry and I'll
never understand it. You
have been divorced twice
and the first marriage you
said just went bad and the
second you said he didn't
want to touch you anymore
and here you are saying that
you would have lied,
cheated, drug me through
marriage counseling all while
lying and having affairs and
not knowing a thing about
my or our life - did someone



Text Message





Julie >

and the first marriage you said just went bad and the second you said he didn't want to touch you anymore and here you are saying that you would have lied, cheated, drug me through marriage counseling all while lying and having affairs and not knowing a thing about my or our life - did someone call you names and attack you about your failed marriages? I'm sorry you have so much anger inside you but you don't have the whole picture and it seems you were lied to quite a bit too.

People make choices- I never made Erich do anything- God gave man freewill- a good man would have dealt with situations and not blamed everyone



Text Message



10:42



Julie >

too.

People make choices- I never made Erich do anything- God gave man freewill- a good man would have dealt with situations and not blamed everyone else for his sins. I went through my own shares of hardship- have you ever thought of that? Of course not- i was never perfect but I was far from a horrible wife. I'm not going to sit here and attack anyone or blame anyone either. The past is the past- I keep trying to tell you that but I will not be called a liar and a bad mother for 11 years either.

My first my husband beat me...the second I chose the wrong guy. I own my mistakes in both marriages. I



Text Message



DFT 0071

RA000840

10:42



Julie >

called a liar and a bad
mother for 11 years either.

My first my husband beat
me...the second I chose the
wrong guy. I own my
mistakes in both marriages. I
know the entire story Raina. I
also know you emoti

and tried to work things out.
He treated you fairly by
letting you use his gi bill for
your education. You have
made his life hell since. I
know who you

onally abused Erich. You lied
to him I am not a fool. It takes
2 to ruin a marriage and you
were not innocent. He made
mistakes he regrets. He
apologized

are and I just wish you
would stay the heck out of
our lives.



Text Message



DFT 0072

RA000841



Julie >

onally abused Erich. You lied to him I am not a fool. It takes 2 to ruin a marriage and you were not innocent. He made mistakes he regrets. He apologized

are and I just wish you would stay the heck out of our lives.

ourselves and stop interfering with our parenting time. Get Nate under control so he isn't in trouble constantly and teach him things like how to think o

Well be a good mom and stop programming Nate. Stop blaming us for his problems. Mind your own business when he us with us. Give us space to have Nate to

f others first before himself



Text Message





Julie >

problems. Mind your own business when he us with us. Give us space to have Nate to

f others first before himself and how to do acts of service. Then the next 11 years can be better.

Sometimes the situation man finds himself in is too hard and he breaks

He is human and he has owned his mistakes. He has repented and turned his life ar

is life hell. Be proud of him and grateful Nate has such an amazing dad. Try telling Nate that. Nate told me you said his dad was really mean and that ch

ound. He did what he should do. He is now good in God's



Text Message





Julie >

and that ch

ound. He did what he should do. He is now good in God's eyes. You need to stop focusing on what he did in the past as justification to continue making h

times he wasn't but missed Nate fiercely. He had a job that took him from his family. He did not abandon his son. How dare you tell Nate that. This is wh

y I am angry. We have to undo all of the damage you have done. While you blame us

eated on you. What mom tells her 7 yr old that? You told Nate his dad wasn't around for 4 years. Erich has a journal of everytime he was. And all of the



Text Message





Julie >

US

eated on you. What mom tells her 7 yr old that? You told Nate his dad wasn't around for 4 years. Erich has a journal of everytime he was. And all of the

Julie- you have no clue and I'm sorry you choose to see things with a closed mind and heart. As a mother, I will never understand you. I hope we can learn to work together and you can stop attacking and being angry and come to the reality of all that actually happened.

Wed, Jun 5, 8:07 PM

Number changed to **Primary**

Raina



Text Message



10:43



Julie >

and come to the reality of all that actually happened.

Wed, Jun 5, 8:07 PM

Number changed to Primary



Raina



7192091800



More info

History

Show your voicemails?

Show



Today 8:18 PM

Incoming call, 0 mins 23 sec



Today 8:07 PM

Outgoing call, 10 mins 17 sec



Yesterday 8:03 PM

Outgoing call, 3 mins 20 sec

If I was so set on hanging up at 10 minutes I would not have told Nathan let's call



Text Message



DFT 0077

RA000846



Julie >

Show your voicemails?

[Show](#)

Today 8:18 PM

Incoming call, 0 mins 28 sec



Today 8:07 PM

Outgoing call, 10 mins 17 sec



Yesterday 8:03 PM

Outgoing call, 3 mins 20 sec

If I was so set on hanging up at 10 minutes I would not have told Nathan let's call back and then just as I was calling back you called. Had I intentionally hung up on you I definitely would not have answered your call. I answered because I wanted him to be able to say goodnight to you. So sad you must be to work so hard to fight with us and to make it seem like things are not good for Nathan in Colorado. You must be so insecure to go to such lengths.



Text Message



“EXHIBIT D”

Message Report

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Raina Martin generated this report on 06/08/19 at 11:28 AM. All times are listed in America/Los_Angeles timezone.

Message: 1 of 1

Date: 08/19/2016 9:49 AM

From: Raina Martin

To: Erich Martin (First View: 08/19/2016 9:49 AM)

Subject: Nathan's Glasses

Erich,

Would you please make sure Nathan wears his glasses. His vision is so bad that I have to bring him back to have it re-analyzed when he gets home. He hasn't had them on for over a week since being at Julie's house. Please make sure that he wears them-he needs it.

Raina

DFT 0079

RA000849

Message Report

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Raina Martin generated this report on 06/08/19 at 11:29 AM. All times are listed in America/Los_Angeles timezone.

Message: 1 of 1

Date: 08/19/2016 8:09 PM

From: Raina Martin

To: Erich Martin (First View: 08/19/2016 8:12 PM)

Subject: Court Date

Erich,

Did you have your court date today? If so, what was the outcome? I vaguely remember you saying that one of the dates was pushed back after your wedding and wasn't sure which one it was.

Also, Nathan is still not wearing his glasses. He starts school in 2 weeks and needs to make sure his eyes are adjusted. Again, please make sure he wears them- they're not optional.

Raina

DFT 0080

RA000850

We would encourage full participation by all grandparents and siblings if you weren't such a nightmare to deal with. We would plan something and you would destroy it making us rearrange just so you have control. Then you would call everyday and grill Nathan and make us all miserable. It would be nice if you could just back off. Nathan has love and support from all of Julie's family when he is here. Noone lives close by so we do not see them often but holidays and gifts are equal between all kids. Julie's parents don't travel to watch her kids do anything why would we expect them to deal with you in Vegas. Julie and her ex get along and don't communicate sometimes for weeks at a time. With no question. She doesn't call her kids everyday and neither does he. And there is no question or criticism for it. He takes them somewhere out of town and there is no grilling him for details or information followed by criticizing every thing he does... she trusts him and she respects the vacation and let's them have their time with their dad.

Nathan transitions fine. He is not struggling emotionally. That is your lie! It is you that needs therapy!! You cause him grief trying to convince him that we are bad and grilling him into exhaustion. His words to me are: "my mom yells bad things about you all of the time." Leave him alone when he gets back and he will be just fine. Don't be so dramatic about him coming and he will be just fine. Be a good mom and pay attention to him on your time and he will be fine. He is 7 he does not need regular therapy. He needs you to back off and he needs you to support a relationship with his dad. You constantly tell everyone the transition is so hard on Nathan as the scapegoat for your poor parenting and Nathan's bad behavior. It is a lie. Nathan needs his mom to stop making excuses for him and you need to realize you have screwed up. Nate needs someone to teach him at home how to behave instead of putting an iPad in his lap and ignoring him.

Show me in the decree where I am required to pay for his sports. I'm not! If you choose to put him in tkd that's fine but you should pay for it. If I do something here I will pay for it. As far as glasses go a 7yr old does not need 4 pairs of glasses in 1 year that cost over \$500 each when between 2 insurances they should be covered. He is 7! His parents should decide what he wears. It's not up to Nathan. He can have designer glasses when he can pay for them himself. It is insane to spend that on glasses. No way will I pay that. He doesn't need back up pairs or transition lenses that look ridiculous btw. Please send his normal glasses this summer. The ones he brought last time were hideous. If you want to include me in the decisions I am happy to pay but, unnecessary charges for designer glasses for a 7 year old that look terrible, I will not agree to that.

The decree says we will make joint decisions on his medical care and providers. It also says that you will only use in network providers unless impossible and you will inform me first and we should agree if it is necessary. It also says that if it is not going to be covered by insurance due to you choosing non network or non covered items without discussing it with me first you will be responsible for more cost up to 100%. If you had included me in the decision and I had agreed it was necessary I am responsible for it. You did not do this!! I got a photo of a partial receipt. I did not receive any EOB from either of his insurances on why things were not covered. Or exactly what the insurance paid and didn't pay....Also in the decree.....I told you the 1st time you got designer glasses for Nate I did not agree. You knew I would not agree again and you still got them and billed me without complete information and details. You need to follow the decree Raina. I have tricare insurance. If you go to the right Dr and choose items allowed by insurance everything should be covered if not he has secondary insurance to pick up the difference. Designer lenses and glasses are not necessary.

My mom does not need you calling her and manipulating her. She doesn't need you demeaning me to her in order to be Nathan's grandmother. Don't call her asking where I am or what I'm doing? My life is none of your business!! You are the reason she didn't see Nate for the first 4 years don't act like you care now. You are using her. She can be Nathan's grandmother through me. Leave me and my family alone. You are only writing things in here and talking to my command to make false attempts of defamation. Please understand that you are re-married and that you NO LONGER get to pretend to be my keeper. You try to make lies to my command and a week later you make up a lying email about "caring about me?!" You are twisted and sick in the head. Anyone who is normal can see that you are manipulating and are a fake. Leave me alone and just let me have my son be with my family!

Erich

On Mon, 04/16/18 at 11:12 PM, Raina Martin wrote:

To: Erich Martin

Subject: Summer Visitation

Erich,

Also, please see the attached copy of our decree that states Nathan is to go to you the Monday after school let's out. I understand it's memorial weekend and I plan on flying him out on Saturday May 26th and returning July 21st. I am asking where he is flying into to make arrangements.

I also stated that we would like to come see him about 1/2 way through (around June 23rd) to come see him and hopefully catch any sporting events he's participating in. We would like to plan.

There is absolutely no reason to be angry or find ways to make things difficult. I have always allowed you to have open communication with Nathan, you have always been invited and welcomed to every event that he's been apart of- it's been your choice to not attend and not participate in any of his events other than one flag football game and 2 Tae Kwon Do practices in his 7 years of life. I plan on being apart of

-
- **On Sun, 12/09/18 at 8:46 PM, Raina Martin wrote:**
 - **To:** Erich Martin
 - **Subject:** Visits

Erich,

Would you please explain to me why Nathan is having to take his perception glasses off when he goes outside?

Raina

-
- **On Sun, 12/09/18 at 8:18 PM, Erich Martin wrote:**
 - **To:** Raina Martin
 - **Subject:** RE: Nathan 28DEC FLIGHT

You are being extreme and making things up here. Show me where I put him on a flight at 4am or 10pm?

Also, Nate can "nap safely" on unaccompanied minor flights too. He doesn't need you being a helicopter over him. So please show me the proof of 4am flights.

And just have Nate call. I know his showers don't last 20minutes.

Erich

-
- **On Sun, 12/09/18 at 8:14 PM, Raina Martin wrote:**
 - **To:** Erich Martin
 - **Subject:** RE: Nathan 28DEC FLIGHT

Erich,

Again- this email wasn't necessary. I have every right to comment when you place our son on a flight at 4:00am or 10pm and expect him to go to school. 'one who asked to have him on that date and we did just that to avoid any further issues with you. Not to mention, Tony and I are flying with him and is ab safely.

Raina

-
- **On Sun, 12/09/18 at 8:08 PM, Erich Martin wrote:**
 - **To:** Raina Martin
 - **Subject:** RE: Nathan 28DEC FLIGHT

Based on how late this flight is getting in, you shouldn't ever complain how late he arrives back to you. And if you want to argue about the school factor h nonplus, seeing as how they are just playing around before Christmas.

All I'm saying here is please don't raise some sort of a fuss in the future if you're not going to send him to me until late at night.

Erich

-
- **On Sun, 12/02/18 at 12:16 PM, Raina Martin wrote:**
 - **To:** Erich Martin
 - **Subject:** RE: Nathan 28DEC FLIGHT

Here is Nathan's flight info.



Raina Martin generated this report on 06/08/19 at 11:51 AM. All times are listed in America/Los_Angeles timezone.

- Message: 1 of 1
- Date: 12/10/2018 5:50 AM

Message Report

- To:
 - Erich Martin (First View: 12/13/2018 11:09 AM)
- Subject: RE: Visits
- Erich,

You and Julie have both told me that you don't like Nathan's transition lenses. I am making sure that you both are not having him take them off due to that fact; that is a legitimate concern.

Raina

-
- On Mon, 12/10/18 at 3:48 AM, Erich Martin wrote:
 - To: Raina Martin
 - Subject: RE: Visits

Again I am telling you to stop making things up about flights.

Also, he's only had to take them off for swimming and sledding, or if he's going to be playing something that he could break them. You waste so much time on the most ridiculous of matters. All you're trying to do is hope you can capture something here to be dramatic as usual and deflect from the fact you just make lies about flights and such. Just stop it.

Erich

-
- On Sun, 12/09/18 at 8:55 PM, Raina Martin wrote:
 - To: Erich Martin
 - Subject: RE: Visits

Erich,

I will get you dates by the end of the week to provide accuracy.

His doctor prescribed glasses for him to see. I'm sorry my autocorrect kicked in.

Again- I am asking you why our son has to take his doctor prescribed glasses off when he goes outside? You seem to be avoiding the questions.

Raina

-
- On Sun, 12/09/18 at 8:51 PM, Erich Martin wrote:
 - To: Raina Martin
 - Subject: RE: Visits

I don't know what "perception glasses" are- but I'm pretty sure you're dodging the fact that you just lied about me sending Nate at 4am or 10pm- perhaps those are the ridiculous ones that shouldn't be sent.

All I said is don't make a fuss if I send him late since you have no issue making us go to the airport at 10:30pm and it's a 2hr drive. I wasn't being mean or stating a fact. And as usual you try this crap of making up stuff that you can't prove. This is who you are Raina- you play victim and you're the one who causes violations.

Erich

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Raina Martin generated this report on 06/08/19 at 11:43 AM. All times are listed in America/Los_Angeles timezone.

Message: 1 of 1

Date: 02/07/2019 8:06 PM

From: Raina Martin

To: Erich Martin (First View: 02/07/2019 8:06 PM)

Subject: Vision

Attachments Vision_attach.jpg

Erich,

Nathan needs new lenses - he has astigmatisms in both eyes and his right eye Rx is much stronger than last time. The doctor stated that he needs to wear his glasses at all times. We might try contacts next year depending on how well he keeps these glasses over the year.

The information of the office and the doctor information is on the paperwork.

Raina

“EXHIBIT E”

they have to award the modifications or send us to mediation. Mediation doesn't mean an agreement if we don't agree there the court decides. Nothing said in mediation can even be used in court. I'm not sure you understand the process of mediation.

Nathan doesn't have dental insurance and doesn't need it. He can get any dental treatment needed through Julie and her pediatric dental office. And, you are a dental Hygienist I'm sure he can continue getting free cleanings and exams from you at your office. As far as Ortho goes it is elective and we will require a second opinion before agreeing to treatment and it can also be done here in Fort Collins.

Nathan doesn't want to see Dr Harder. I asked him if he did and he said he did not care. He has never expressed a desire to see him. You want him to see that therapist so you can try and blame me for Nathan's poor behavior. On top of that, you make negligible and flagrant claims of how his "scared of me," which he's not.

Dr Harder has a poor reputation and I am not comfortable with Nathan seeing him. I would like for him to see a therapist here in Colorado when he is with me? We can find someone different in Las Vegas and he will see someone in both places as it should be family counseling. If not, then we will figure out his therapy later, as I am not going to have him see a therapist that you are the only person the therapist will talk to. Again, I know you would not agree to such practices.

Despite your rude claims, I participate in Nathan's life. So you can stop saying that- everyone reading this and who knows me, to include your own parents, know that I am highly involved in Nathan's life despite the distance.

Erich

On Tue, 02/19/19 at 9:19 PM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Flight 2/18/19

Erich,

We can address that at mediation as it should still be continued.

Thank you for the decree outline. It's time we update it.

While you're at "clarifying" things- would you please, provide me with Nathan's dental insurance and a therapist. Nathan would like to continue seeing Dr. Harder.

Thanks,
Raina

On Tue, 02/19/19 at 9:10 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Flight 2/18/19

Just so you're aware, as per the decree, sending a photo or notification of being at the gate is NOT necessary. Figured I should follow up with you on this matter since we are documenting everything.

Erich

On Mon, 02/18/19 at 8:02 PM, Raina Martin wrote:

To: Erich Martin

Subject: Flight 2/18/19

Erich,

I am at the airport waiting at his gate.

Raina

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Raina Martin generated this report on 06/09/19 at 11:13 PM. All times are listed in America/Los_Angeles timezone.

Message: 1 of 1

Date: 02/20/2019 9:27 PM

From: Raina Martin

To: Erich Martin (First View: 02/20/2019 9:27 PM)

Subject: RE: Flight 2/18/19

Erich,

You have never provided me with any insurance change or information- Please send me the information.

Raina

On Wed, 02/20/19 at 5:45 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Flight 2/18/19

I have dental insurance for Nathan through my wife's work. It is all free. Ortho is paid at 50% through specific providers. Nathan's insurance was not terminated without coverage. Like I said, he can get his dental taken care of with us.

Please let me know that you're going to send him for the visitation days I have requested. It has been 6 days since I sent that message.

Erich

On Wed, 02/20/19 at 9:39 AM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Flight 2/18/19

Erich,

Mediation is necessary because you refuse to follow it. You refuse to pay for anything for our son- sports, medical, eyewear, etc. you refuse daily communication, you refuse therapy unless it's exactly what you want. Nathan does want to see Harder- not me- I don't care what he tells him! Lastly, you terminated his dental insurance and never informed me- ortho is not elective and you're doing anything to avoid having to pay for anything in any way and not what is in the best interest of OUR SON. The decree was meant to be followed and not not optional according to what you want.

Thanks,
Raina

On Tue, 02/19/19 at 10:20 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Flight 2/18/19

There's no need for mediation unless you are wanting to modify something in the decree. Is there something you are wanting to modify? If we can reach an agreement we can have an attorney draft a stipulation and submit it to the court. A mediator is only if we do not agree. And since you haven't told me what you want to modify, how do you know we don't agree? You need to be honest and upfront about what you want to discuss in mediation before you try to schedule it. For the court to award mediation you have to ask the court for modifications and

DFT 0086

RA000857

Rayna I have responded about counseling. I told you 2 months ago if you would agree to him seeing a counselor here in Fort Collins with me and his family. He can see whoever you would like him to see in Vegas with you. And for the record, Dr H did refuse to talk to me even when I offered to pay.

Denied visitation:

Let me make this clear unless I am taking a vacation with my entire family to visit Las Vegas I have no intention of making my visitation be in Las Vegas. That was a manipulated stipulation of yours to place in the decree. I will not segregate Nathan from this family with visitations of only me going to Las Vegas. Repeatedly I have told you I cannot afford to go to Las Vegas get a hotel room and a rental car pay and for every bit of entertainment and food while I'm there. I don't make you pay \$1,000.00 to see him for just a weekend, which is what it would cost for me just to see him for 36hrs when all is said and done. Why would you ask me to go support him in taekwondo when you don't even show up to watch him? I do not believe it is appropriate for me to go watch a guitar lesson- it's called a private lesson for a reason.

However, What is appropriate is for him to bring his guitar and play it for me. As far as Nathan visiting me four times in four months let me explain. His travel to me that alternates is on non regular visitation. You do NOT count spring break which would be April and you do NOT count summer which is May as those are not 3 day weekends from school visitations. I think that since I am missing part of Nathan's spring break due to work it would be an acceptable trade for Nathan to come and visit me in March. This is not a hardship for him. Like I said before it is about control for you.

You preach that you want us to have a relationship and yet you deny it at every turn. The relationship that I am interested in fostering is not just with me it is with my amazing wife and our children here in Fort Collins. Due to the change in circumstances of me being married and having a family it is no longer feasible for me to go to Las Vegas for visitation. I don't make you separate yours and Tony's family. So I would hope that you would be willing to stipulate this as a change to the decree without attorneys and court but if you are not then please let me know so that I can file a motion.

Thanks,
Erich

On Sun, 03/17/19 at 9:58 PM, Raina Martin wrote:

To: Erich Martin
Subject: Summer 2019
Erich,

I have asked a few times and you still haven't gotten back to me about Nathan's summer. Will he be staying in Colorado or Texas? I would like to help coordinate sports with you. I can start looking into things and helping arrange anything I can. Soccer, baseball, basketball, or even TKD. Please let me know so it's not crunch time and he's left not doing anything like last year. I am willing to modify his visitation if it will help accommodate a sport and I'll even contact coaches if he is still in school the first week to arrange time and communicate with them and/or work with Nathan before he goes with and drills or workouts they are having.

You will be retiring in July 2019 and wanted to find out where you will be living and also Nathan's medical/vision insurance going forward? I am also waiting on Nathan's dental insurance information - since it was cancelled in 2017 and I was never informed until this month.

I will be taking Nathan to an orthodontist here in town. Dr. Truman, Dr. Chenin, or Dr. Hamilton - I won't decide until I find out price and recommended treatment. He will be having consultations soon, as his #7 is being effected by #6. You have already informed me you won't help pay for any of it and I am more concerned about his future oral health at this point- and not wanting to arguing over money for our child's health.

Lastly, I still haven't heard anything about counseling and recommendations for a counselor for Nathan. I feel that he was making a connection with Dr. Harder and feel that he was a great option. You never had to pay a penny and you never had to worry about taking him to his appointments. Dr. Harder had no problem with talking to you if you paid for his time.

Please don't tell me you'll do something and not follow through or not communicate about it.

Raina

Do your homework. Talk to an attorney! Stop asking for mediation as it makes you sound ridiculous and unintelligent. Come up with a settlement that we both can agree upon, live with what we have or let the judge decide for us. Remember to change the decree without an agreement to do so there has to be EXTENUATING CIRCUMSTANCES or we don't even get permission to mediate it.

Thanks,
Erich

On Mon, 03/18/19 at 6:51 PM, Raina Martin wrote:

To: Erich Martin
Subject: RE: Summer 2019

That email was not written by Erich and feel that if there's so much to discuss and that you disagree with- I feel that mediation is a better option.

I am not going to sit here and argue about our son's healthcare and what you feel and how he should be treated so you get it for "free" is not how a child should be looked at.

Raina

On Mon, 03/18/19 at 6:10 PM, Erich Martin wrote:

To: Raina Martin
Subject: RE: Summer 2019

Raina,
Nathan's summer:

Nathan will not have any further visits to Texas unless I plan on a vacation to visit Papa. He will spend the summer in Fort Collins.

Sports this summer:

Soccer: for competitive soccer tryouts are at the end of May for season that begins end of August and goes year-round with one month off in the winter and one month off in the summer. This is clearly not going to happen for Nathan. For recreational soccer their season ends mid-May and starts in September this is also not going to happen for Nathan.

Baseball:

tryouts for baseball were months ago teams have long been formed games start in April. This is not going to happen for Nathan.

Basketball:

This is a winter sport

TKD: I still do not support based on Nathan's history of hitting kids at school. I don't know why you keep ignoring this fact. I think it's a waste of time and money because I've watched a few of his practices in person and notice he doesn't pay attention to instruction. Furthermore, if you aren't going to encourage fitness outside of TKD, he's not going to gain anything.

Swimming:

If Nathan is interested in being on the swim team I will sign him up for the neighborhood swim team. He will have to wake up everyday at 6:00 a.m. and swim until 8:30 a.m. It starts Memorial weekend and goes all summer. If Nathan cannot behave himself during swimming he could lose the privilege of being on a team.

My retirement:

Anything pertaining to my retirement is none of your business. Use some common-sense Raina. Where do you think I will live once I retire? I had every intention of living in my home with my amazing wife and family.

Medical benefits:

Nathan will continue to have medical and vision through the military and he will have dental covered for free through your work and Julie's work. Right now you work for a dentist your job is to clean teeth. Nathan goes to you for his dental needs. If something is not covered there it is covered here in Fort Collins at Julie's dental office. There is no need for Nathan to have dental insurance. Nathan can see an orthodontist for free here in Fort Collins. Has Nathan had a CT scan of # 7 to see if it's actually being affected? I can have that confirmed here if needed.

Counseling:

On Mon, 03/18/19 at 8:03 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Summer 2019

Raina,

It's not name calling- it's facts. You abuse words and terms like mediation, among others, you do not seem to know. And you have merely pointed out that having a degree hasn't increased your ability to know or understand the definitions of words and their applications. So, don't be a hypocrite and try to throw digs about you obtaining a Master's degree at my wife. Save it for someone who cares because I don't. And for the record, I (Erich) am writing the emails.

Erich

On Mon, 03/18/19 at 7:58 PM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Summer 2019

Erich,

Stop having Julie send messages.

You read the decree-mediation is necessary. Please quit name calling.

I have a bachelors degree in science (emphasized in dental hygiene/teaching) and going to start my masters this year- what does Julie have?

Raina

On Mon, 03/18/19 at 7:33 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Summer 2019

Raina,

What is "so much don't we agree" on that is even relevant? Just having you have full control over Nathan's dental care when Julie has 100 times more knowledge and experience than you do. Orthodontics at 8yrs old isn't urgent.

As far as sports go, that is pretty petty don't you think? Let me do my thing and you do your thing when it comes to extracurricular activities. Whatever he does here I will pay for and decide on. Whatever he does there is up to you and you pay for.

Read the decree if you want to see how the holidays and regular visitation works.

If Nathan gets free dental that's exactly what he should get and how he should be looked at. Check out the reputation of Dr. Mark Cranc. He is one of the top orthodontists in the Nation. He will see Nathan for free and set his treatment plan around living in Las Vegas. He does this all of the time as people from all over the country come to see him. This is not unusual. If Nathan needs routine dental care and if your work does not provide it then Julie's will. Her dentist is well known and highly rated. He as well has kids from other states frequently see him for routine care and surgeries.

There is no court that will enforce having separate dental insurance for Nathan when this is the case. In the decree it even states you have to use someone in network. These 2 providers in fort Collins and your office are "in network" for Nathan's benefits. You have to either not be able to get care or agree on who Nathan sees before choosing an out of network provider.

Raina, I will explain this for the last time!!! A mediator is not where you go to enforce the decree. It is not the first place you go and it definitely does not have any legal binding action. It is a place that you go when you BOTH agree to change an existing decree. When you have most of the details worked out and need advice on others. If you do not BOTH agree on changing the decree then you file a motion in court. The judge needs to agree that there are EXTENUATING CIRCUMSTANCES that makes it justifiable for the decree to be changed. If she does this and we cannot reach an agreement ON OUR OWN then she will order mediation. ABSOLUTELY NOTHING DISCUSSED IN MEDIATION CAN BE USED IN COURT. If we can't agree in mediation and don't stipulate to that agreement then the judge will decide however she feels is best. The judge does this without even knowing what was discussed in mediation because anything said in mediation is not able to be used in court. And trust me we may end up with something neither of us want.

“EXHIBIT G”

12:07

LTE

Expense
Register

 Cord Blood Banking	07/24/19
\$125.00	\$62.50
Refused	\$62.50
TKD Testing Purple Belt	09/01/18
\$65.00	\$32.50
Refused	\$32.50
Robotics After School Program	08/30/18
\$125.00	\$62.50
Refused	\$62.50
Cord Blood Banking	08/13/18
\$125.00	\$62.50
Refused	\$62.50

Too Kwon Do

08/02/19

DFT 0090

RA000862

\$179.00

\$89.50

\$89.50

Refused

School Supplies/Clothes

07/23/18

\$300.00

\$150.00

\$150.00

Refused

 Nathan's Glasses 2018

01/13/18

\$216.00

\$108.00

\$108.00

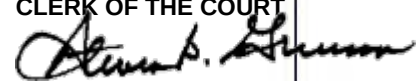
Refused

 Cord Bank

07/01/17

103

103



1 **EXHS**

2 MATTHEW H. FRIEDMAN, ESQ.

3 Nevada Bar No.: 11571

mfriedman@fordfriedmanlaw.com

4 **FORD & FRIEDMAN**

2200 Paseo Verde Parkway, Suite 350

Henderson, Nevada 89052

5 T: (702) 476-2400

6 F: (702) 476-2333

Attorneys for Defendant

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

9 ERICH M. MARTIN,

10 Plaintiff,

11 vs.

12 RAINA L. MARTIN,

13 Defendant.

CASE NO.: D-15-509045-D

DEPT.: C

Date of Hearing: October 2, 2019

Time of Hearing: 10:00 a.m.

14 **SUPPLEMENTAL APPENDIX OF EXHIBITS TO DEFENDANT'S**
15 **MOTION FOR APPOINTMENT OF A PARENTING COORDINATOR,**
16 **ISSUANCE OF A BEHAVIOR ORDER, FOR OTHER CUSTODY**
17 **ORDERS AND FOR DEFENDANT'S ATTORNEY'S FEES AND COSTS**
18 **INCURRED HEREIN, AND FOR RELATED RELIEF**

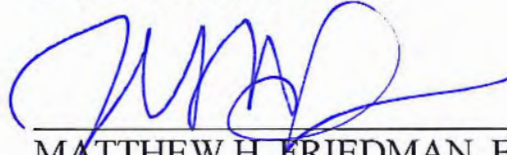
19 COMES NOW Defendant, RAINA MARTIN, by and through his
20 counsel of record Matthew H. Friedman, Esq., of the law firm of Ford &
21 Friedman and hereby files this Supplemental Appendix Of Exhibits To
22 Defendant's Motion For Appointment Of A Parenting Coordinator, Issuance Of
23 A Behavior Order, For Other Custody Orders And For Defendant's Attorney's
24

1 Fees And Costs Incurred Herein, And For Related Relief, **with the additional**
2 **exhibits in bold.**

3 This Appendix is filed pursuant to EDCR 5.205(d).

4 DATED this 29 day of August, 2019.

6 **FORD & FRIEDMAN**

7 

8 MATTHEW H. FRIEDMAN, ESQ.

9 Nevada Bar No.: 11571

10 2200 Paseo Verde Parkway, Suite 350

11 Henderson, Nevada 89052

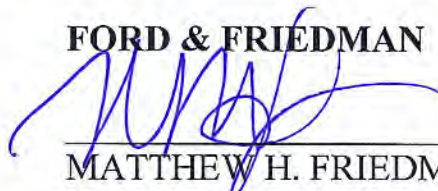
12 *Attorneys for Defendant*

APPENDIX OF EXHIBITS

Ex.	Description	Bates No.
A.	Affidavit of Raina Martin	DFT 0001 – DFT 0005
B.	Our Family Wizard Communications memorializing text conversation between Defendant and Plaintiff's wife	DFT 0006 – DFT 0007
C.	Text message communications between Defendant and Plaintiff's wife	DFT 0008 – DFT 0078
D.	Our Family Wizard Communications between the parties concerning the minor child's eyeglasses	DFT 0079 – DFT 0084
E.	Our Family Wizard Communications between the parties concerning the minor child's dental insurance	DFT 0085 – DFT 0089
F.	Video of Defendant's Facetime call with minor child in November 2019	N/A
G.	Our Family Wizard Report of Unreimbursed Medical Expenses	DFT 0090 – DFT 0091
H.	Declaration of Matthew H. Friedman, Esq. under <i>Brunzell v. Golden Gate Nat'l Bank</i>	DFT 0092- DFT 0095

DATED this 29 day of August, 2019.

FORD & FRIEDMAN



MATTHEW H. FRIEDMAN, ESQ.
Nevada Bar No.: 11571
2200 Paseo Verde Parkway, Suite 350
Henderson, Nevada 89052
Attorneys for Defendant

“EXHIBIT H”

1 **DECLARATION OF MATTHEW H. FRIEDMAN, ESQ. UNDER**
2 ***BRUNZELL v. GOLDEN GATE NAT'L BANK***

3 I, Matthew H. Friedman, Esq., do declare under the law of the State of
4 Nevada and under the penalties of perjury that the foregoing is true and correct to
5 the best of my knowledge and that I have personal knowledge of the facts
6 contained herein, and I am competent to testify thereto.
7

8 Pursuant to *Brunzell v. Golden Gate Nat'l Bank*, in addition to hourly time
9 schedules, the court may consider the following factors in an award of attorney's
10 fees.
11

- 12 1. The qualities of the advocate: his ability, his training, education,
13 experience, professional standing and skill;
14
- 15 2. The character of the work to be done: its difficulty, its intricacy, its
16 importance, time and skill required, the responsibility imposed and the
17 prominence and character of the parties where they affect the importance of
18 the litigation;
19
- 20 3. The work actually performed by the lawyer: the skill, time and attention
21 given to the work; and,
22
- 23 4. The result: whether the attorney was successful and what benefits were
24 derived.
25

26 *See Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349 (1969).

27 I attended and graduated from the William S. Boyd, School of Law which
28 has been ranked among the top 100 law schools throughout the country for the
past ten (10) years according to *U.S. News & World Report*. During my education
and after attending law school I worked for a private law firm in Las Vegas

1 practicing primarily in the area of family law under the direction of a prominent
2 and established attorney. Since this time, I have opened my own law firm also
3 practicing primarily in the area of family law, encompassing complex divorce,
4 child custody, and post decree enforcement and modification. Throughout this
5 progression of events, I have gained a working knowledge of the intricacies of the
6 practice area and have a distinguished reputation and am respected by the
7 members of Nevada's Judiciary, as well as, fellow members of the Nevada Bar.
8

9
10 I was named a Mountain States Super Lawyer "Rising Star" for 2014
11 through 2018, and selected as a member of Nevada's "Legal Elite" in 2013
12 through 2018 by Nevada Business Magazine. I further hold the distinction of
13 being named an AV Preeminent attorney, peer rated for high professional
14 achievement and ethics by Martindale-Hubbell. For the 2014 edition, I was on the
15 cover of Nevada Business Magazine and named the top Southern Nevada
16 Attorney as chosen by my peers. Additionally, the National Academy of Family
17 Law Attorneys has named me one of Nevada's Top 10 Family Law Attorney's
18 Under age 40. The National Trial Lawyers has named me as one of the top 40 trial
19 lawyers under forty for the state of Nevada as well as one of the top 100 Plaintiff's
20 Trial Lawyers in the state. The National Advocates has designated me as one of
21 the top 100 Matrimonial and Family Lawyers for the year 2014 and the American
22 Institute of the Family Law Attorneys named me among its ten best attorneys. I
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1 have also been honored as an Avvo Rated Attorney, receiving an overall rating of
2 10.0 out of 10.0, "Superb" from peers and former clients. I am a licensed member
3 of the Nevada State Bar and am admitted to practice before the United States
4 District Court, District of Nevada and the United States Court of Appeals, Ninth
5 Circuit.
6

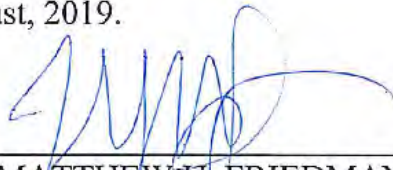
7
8 The character of the work done in this matter has been sophisticated, and
9 necessitous of analysis of the lengthy case history, subsequent filings following
10 the Decree of Divorce, review of lengthy communications between the parties and
11 Plaintiff's historical behavior concerning the minor child as the same relates to the
12 filings in the instant matter. Due to the Plaintiff's refusal to act respectfully and/or
13 abide by the clear and unambiguous Orders of this Court, my client was left with
14 no option but to seek this Court's intervention by way of the instant Motion and,
15 as a result has incurred significant fees and costs, and continues to do so.
16
17
18

19 Each matter that crosses my desk receives extreme scrutiny and the upmost
20 attention to detail. Moreover, I am extremely knowledgeable regarding the
21 overall status and direction of each matter, and I generally handle all day to day
22 tasks which arise. In this matter, I have been counsel to Defendant since early
23 June, 2019. Indeed, in preparing this Motion I have reviewed all pertinent
24 pleadings, as well as met with the Defendant on numerous occasions, for
25 extensive periods of time, to discuss the Defendant's concerns for the minor child
26
27
28

1 while in Plaintiff's home as well as her ongoing requests to Plaintiff that he
2 comply with the Court's Orders and relief she now seeks from this Court. As such,
3 I am extremely well versed on the facts, law and issues surrounding this case, and
4 the billing on this matter is very reasonable.
5

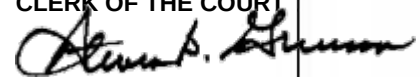
6 Although decision on this matter has not yet been rendered, it is reasonable
7 to believe that my client will prevail, and her request for attorney's fees regarding
8 the same is certainly grounded in solid legal and factual basis.
9

10
11 DATED this 29 day of August, 2019.

12
13 
14 MATTHEW H. FRIEDMAN, ESQ.
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1 **EPAP**
2 MATTHEW H. FRIEDMAN, ESQ.
3 Nevada Bar No. 11571
4 mfriedman@fordfriedmanlaw.com
5 FORD & FRIEDMAN
6 2200 Paseo Verde Parkway, Suite 350
7 Henderson, Nevada 89052
8 Telephone: (702) 476-2400
9 Facsimile: (702) 476-2333
10 *Attorneys for Defendant*

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

14 ERICH M. MARTIN,

15 Plaintiff,

16 vs.

17 RAINA L. MARTIN,

18 Defendant.

CASE NO.: D-15-509045-D

DEPT. NO.: C

19 **EX-PARTE APPLICATION TO SEAL CASE FILE**

20 Comes now, Defendant, RAINA L. MARTIN, by and through her counsel
21 of record, Matthew H. Friedman, Esq. of the law firm Ford & Friedman, and in
22 accordance with NRS 125.110 hereby files this Ex-Parte Application to Seal the
23 Case File in the above-entitled matter.

24 **NRS 125.110 What pleadings and papers open to public inspection;
written request of party for sealing.**

1. In any action for divorce, the following papers and pleadings in the action shall be open to public inspection in the Clerk's Office;

- 1
- 2 a. In case the complaint is not answered by the Defendant, the
- 3 summons, with the affidavit or proof of service; the compliant
- 4 with memorandum endorsed thereon that the default of the
- 5 Defendant in not answering was entered, and the judgment; and in
- 6 case where service is made by publication, the affidavit for
- 7 publication of summons and the order directing publication of
- 8 summons.
- 9 b. In all other cases, the pleading, the finding of the court, any order
- 10 made on motion as provided in Nevada Rules of Civil Procedure,
- 11 and the judgment.

12 **2. All other papers, records, proceedings and evidence, including**

13 **exhibits and transcript of the testimony, shall, upon the written**

14 **request of either party to the action, filed with the clerk, be sealed**

15 **and shall not be open to inspection except to the parties or their**

16 **attorneys, or when required as evidence in another action or**

17 **proceeding.** [emphasis added]

18 The pending litigation herein is expected to involve sensitive information

19 concerning the parties and their minor child and therefore, it will be in all parties'

20 best interests that the matters herein not be open to public inspection, to the

21 greatest extent of the law. Based upon this request and the Affidavit of Counsel

22 provided below, Defendant requests that above-entitled matter be sealed.

23 Dated this 29 day of August, 2019.

24 **FORD & FRIEDMAN**


MATTHEW H. FRIEDMAN, ESQ.

Nevada Bar No. 11571

2200 Paseo Verde Parkway, Suite 350

Henderson, Nevada 89052

Attorneys for Defendant

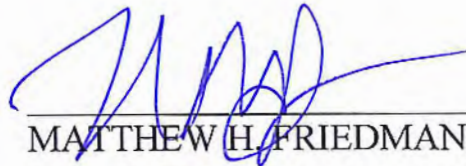
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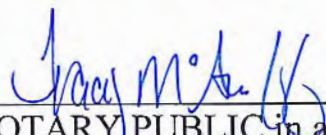
1 7. That your affiant believes it appropriate that the above-entitled matter to be
2 sealed.

3 FURTHER YOUR AFFIANT SAYETH NAUGHT.
4

5 
6 MATTHEW H. FRIEDMAN, ESQ.

7 Subscribed and sworn to before me

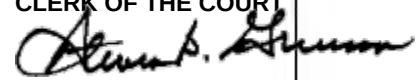
8 this 89 day of August, 2019.
9

10 
11 NOTARY PUBLIC in and for
12 Said County and State



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1 **CSERV**

2 **MATTHEW H. FRIEDMAN, ESQ.**

3 Nevada Bar No.: 11571

4 mfriedman@fordfriedmanlaw.com

5 **FORD & FRIEDMAN**

6 2200 Paseo Verde Parkway, Suite 350

7 Henderson, Nevada 89052

8 T: (702) 476-2400

9 F: (702) 476-2333

10 *Attorneys for Defendant*

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

13 **ERICH M. MARTIN,**

14 Plaintiff,

15 vs.

16 **RAINA L. MARTIN,**

17 Defendant.

CASE NO.: D-15-509045-D

DEPT.: C

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that on the 30th day of August, 2019 I served a true and
20 correct copy of the following documents:

- 21 **1. DEFENDANT'S MOTION FOR APPOINTMENT OF A
22 PARENTING COORDINATOR, ISSUANCE OF A BEHAVIOR
23 ORDER, FOR OTHER CUSTODY ORDERS AND FOR
24 DEFENDANT'S ATTORNEY'S FEES AND COSTS INCURRED
HEREIN, AND FOR RELATED RELIEF;**
- 2. APPENDIX OF EXHIBITS TO DEFENDANT'S MOTION FOR
APPOINTMENT OF A PARENTING COORDINATOR,
ISSUANCE OF A BEHAVIOR ORDER, FOR OTHER**

1 CUSTODY ORDERS AND FOR DEFENDANT'S ATTORNEY'S
2 FEES AND COSTS INCURRED HEREIN, AND FOR
3 RELATED RELIEF;

4 3. SUPPLEMENTAL APPENDIX OF EXHIBITS TO
5 DEFENDANT'S MOTION FOR APPOINTMENT OF A
6 PARENTING COORDINATOR, ISSUANCE OF A BEHAVIOR
7 ORDER, FOR OTHER CUSTODY ORDERS AND FOR
8 DEFENDANT'S ATTORNEY'S FEES AND COSTS INCURRED
9 HEREIN, AND FOR RELATED RELIEF;

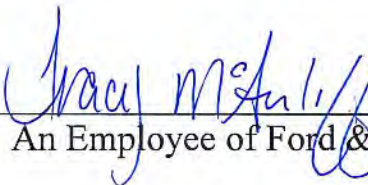
4 4. DEFENDANT'S FINANCIAL DISCLOSURE FORM;

5 5. NOTICE OF HEARING; AND

6 6. EXPARTE APPLICATION FOR AN ORDER SEALING FILE.

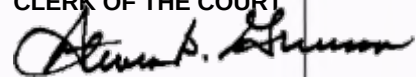
7 to be served via the United States Postal Service, postage prepaid, to the
8 following:

9 Erich Martin
10 3815 Little Dipper Dr.
11 Fort Collins, Colorado 80528
12 *Plaintiff in Proper Person*

13 
14 An Employee of Ford & Friedman

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1 **OSFD**

2 MATTHEW H. FRIEDMAN, ESQ.

3 Nevada Bar No. 11571

4 mfriedman@fordfriedmanlaw.com

5 FORD & FRIEDMAN

6 2200 Paseo Verde Parkway, Suite 350

7 Henderson, Nevada 89052

8 Telephone: (702) 476-2400

9 Facsimile: (702) 476-2333

10 *Attorneys for Defendant*

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

13 ERICH M. MARTIN,

14 Plaintiff,

15 vs.

16 RAINA L. MARTIN,

17 Defendant.

CASE NO.: D-15-509045-D

DEPT. NO.: C

18 **ORDER SEALING CASE FILE**

19 Upon Defendant's Ex Parte Application for Order to Seal Case File, and
20 pursuant to NRS 125.110, which states:

21 1. In any action for divorce, the following papers and pleadings in the
22 action shall be open to public inspection in the clerk's office:

23 (a) In case the complaint is not answered by the defendant, the
24 summons, with the affidavit or proof of service; the complaint with
25 memorandum endorsed thereon that the default of the defendant in not
26 answering was entered, and the judgment; and in case where service is
27 made by publication, the affidavit for publication of summons and the
28 order directing the publication of summons.

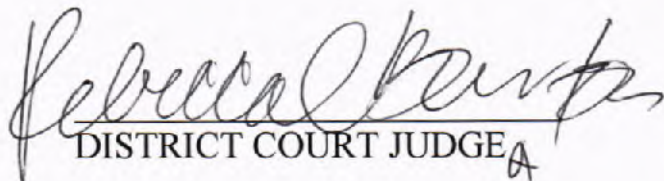
1 (b) In all other cases, the pleadings, the finding of the court, any
2 order made on motion as provided in Nevada Rules of Civil Procedure,
3 and the judgment.

4 2. All other papers, records, proceedings and evidence, including
5 exhibits and transcript of the testimony, shall, upon the written request
6 of either party to the action, filed with the clerk, be sealed and shall not
7 be open to inspection except to the parties or their attorneys, or when
8 required as evidence in another action or proceeding

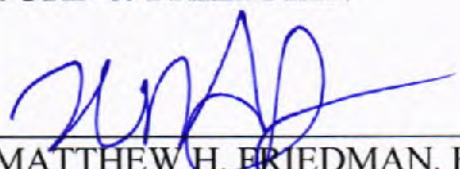
9 AND GOOD CAUSE APPEARING THEREFORE,

10 **IT IS HEREBY ORDERED** that the above-entitled matter shall be
11 SEALED and that all pleadings shall be SEALED, to the extent permissible
12 pursuant to NRS 125.110.

13 Dated this 3 day of September, 2019.

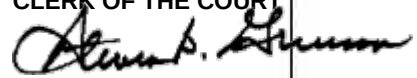
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18 DISTRICT COURT JUDGE A

19 *Respectfully submitted by:*
20 **FORD & FRIEDMAN**

21 
22
23 MATTHEW H. FRIEDMAN, ESQ.
24 Nevada Bar No.: 11571
25 2200 Paseo Verde Parkway, Suite 350
26 Henderson, Nevada 8902
27 *Attorneys for Defendant*
28

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1 **NEOJ**

2 MATTHEW H. FRIEDMAN, ESQ.

3 Nevada Bar No. 11571

4 mfriedman@fordfriedmanlaw.com

5 FORD & FRIEDMAN

6 2200 Paseo Verde Parkway, Suite 350

7 Henderson, Nevada 89052

8 Telephone: (702) 476-2400

9 Facsimile: (702) 476-2333

10 *Attorneys for Defendant*

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

13 ERICH M. MARTIN,

14 Plaintiff,

15 vs.

16 RAINA L. MARTIN,

17 Defendant.

CASE NO.: D-15-509045-D

DEPT. NO.: C

18 **NOTICE OF ENTRY OF ORDER SEALING FILE**

19 Please take notice, the following *“Order Sealing File”* was entered, in
20 the instant matter, on the 4th day of September, 2019. A true and correct copy
21

22 . . .

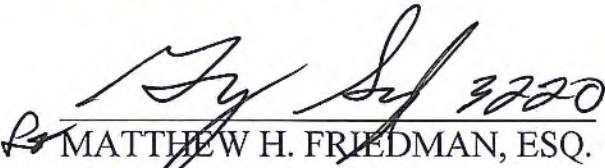
23 . . .

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1 of said order is attached hereto as "Exhibit A."

2 DATED this 9th day of September, 2019.

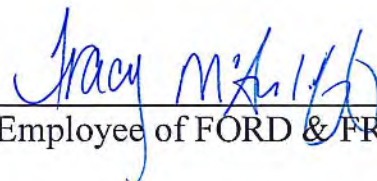
3 **FORD & FRIEDMAN**

4
5
6 
7 MATTHEW H. FRIEDMAN, ESQ.
8 Nevada Bar No.: 11571
9 2200 Paseo Verde Parkway, Suite 350
10 Henderson, Nevada 89052
11 *Attorneys for Defendant*
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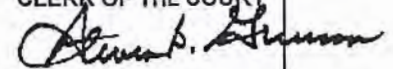
CERTIFICATE OF SERVICE

I hereby certify that on the 9 day of September, 2019, I served a true and correct copy of the foregoing **"NOTICE OF ENTRY OF ORDER SEALING FILE"** to be served via the U.S. Postal Service to the following:

Erich Martin
3815 Little Dipper Dr.
Fort Collins, Colorado 80528
Plaintiff in Proper Person


An Employee of FORD & FRIEDMAN

“EXHIBIT A”



1 **OSFD**

2 MATTHEW H. FRIEDMAN, ESQ.

3 Nevada Bar No. 11571

4 mfriedman@fordfriedmanlaw.com

5 FORD & FRIEDMAN

6 2200 Paseo Verde Parkway, Suite 350

7 Henderson, Nevada 89052

8 Telephone: (702) 476-2400

9 Facsimile: (702) 476-2333

10 *Attorneys for Defendant*

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

13 ERICH M. MARTIN,

CASE NO.: D-15-509045-D

14 Plaintiff,

DEPT. NO.: C

15 vs.

16 RAINA L. MARTIN,

17 Defendant.

18 **ORDER SEALING CASE FILE**

19 Upon Defendant's Ex Parte Application for Order to Seal Case File, and
20 pursuant to NRS 125.110, which states:

21 1. In any action for divorce, the following papers and pleadings in the
22 action shall be open to public inspection in the clerk's office:

23 (a) In case the complaint is not answered by the defendant, the
24 summons, with the affidavit or proof of service; the complaint with
25 memorandum endorsed thereon that the default of the defendant in not
26 answering was entered, and the judgment; and in case where service is
27 made by publication, the affidavit for publication of summons and the
28 order directing the publication of summons.

1 (b) In all other cases, the pleadings, the finding of the court, any
2 order made on motion as provided in Nevada Rules of Civil Procedure,
3 and the judgment.

4 2. All other papers, records, proceedings and evidence, including
5 exhibits and transcript of the testimony, shall, upon the written request
6 of either party to the action, filed with the clerk, be sealed and shall not
7 be open to inspection except to the parties or their attorneys, or when
8 required as evidence in another action or proceeding

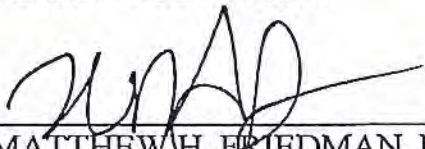
9 AND GOOD CAUSE APPEARING THEREFORE,

10 IT IS HEREBY ORDERED that the above-entitled matter shall be
11 SEALED and that all pleadings shall be SEALED, to the extent permissible
12 pursuant to NRS 125.110.

13 Dated this 3 day of September, 2019.

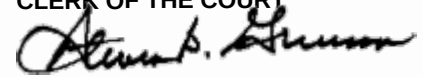
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DISTRICT COURT JUDGE A

19 Respectfully submitted by:
20 FORD & FRIEDMAN

21
22 
23 MATTHEW H. FRIEDMAN, ESQ.
24 Nevada Bar No.: 11571
25 2200 Paseo Verde Parkway, Suite 350
26 Henderson, Nevada 8902
27 Attorneys for Defendant
28

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1 Randal R. Leonard, Esq.
2 Nevada Bar No. 6716
3 500 South 8th Street
4 Las Vegas, NV 89101
5 (702) 598-3667
6 (702) 598-3926 fax
7 rleonard999@yahoo.com

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DISTRICT COURT
CLARK COUNTY, NEVADA

ERICH MARTIN,

Plaintiff,

-VS.-

RAINA MARTIN,

Defendant.

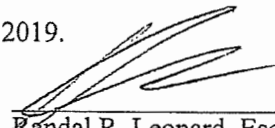
CASE No. D-15-509045-D

DEPT. No. C

NOTICE OF WITHDRAWAL OF ATTORNEY

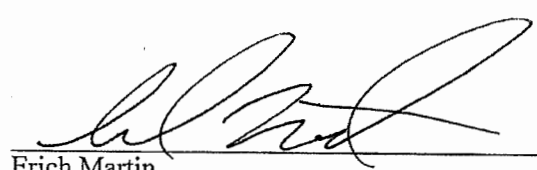
Notice is hereby given that the undersigned hereby withdraws as attorney of record in the above-styled case. Nevada Supreme Court Rule 46 allows an attorney to withdraw from an action with permission from the client.

Dated this 16 day of September, 2019.



Randal R. Leonard, Esq.

I agree to the withdrawal:



Erich Martin

CERTIFICATE OF SERVICE

I hereby certify that I am over eighteen years of age and further certify that on the 16th day of September, 2019, I sent via electronic means and first class mail a true and correct copy of the above Notice of Withdrawal of Attorney to the following:

Erich Martin
3815 Little Dipper Drive
Fort Collins, Colorado 80528
Plaintiff, In Proper Person

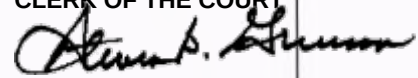
MATTHEW H. FRIEDMAN, ESQ.
Nevada Bar No.: 11571
mfriedman@fordfriedmanlaw.com
FORD & FRIEDMAN
2200 Paseo Verde Parkway, Suite 350
Henderson, Nevada 89052
T: (702) 476-2400
F: (702) 476-2333
Attorneys for Defendant



Randal R. Leonard, Esq.

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1 **SAO**
2 MATTHEW H. FRIEDMAN, ESQ.
3 Nevada Bar No. 11571
4 mfriedman@fordfriedmanlaw.com
5 FORD & FRIEDMAN
6 2200 Paseo Verde Parkway, Suite 350
7 Henderson, Nevada 89052
8 Telephone: (702) 476-2400
9 Facsimile: (702) 476-2333
10 *Attorneys for Defendant*

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

9 ERICH M. MARTIN,

10 Plaintiff,

11 vs.

12 RAINA L. MARTIN,

13 Defendant.
14

CASE NO.: D-15-509045-D

DEPT. NO.: C

15 **STIPULATION AND ORDER TO**
16 **CONTINUE MOTION HEARING**

15 **COME NOW** Plaintiff Erich Martin, in proper person, and Defendant
16 Raina Martin, by and through her counsel of record Matthew H. Friedman, Esq.
17 of the law firm of Ford & Friedman, and hereby stipulate and request entry of
18 order as follows:
19

20 **WHEREAS** the Defendant filed a Motion For Appointment Of A
21 Parenting Coordinator, Issuance Of A Behavior Order, For Other Custody Orders
22 And For Defendant's Attorney's Fees And Costs Incurred Herein, And For
23 Related Relief on or about August 27, 2019; and
24

1 **WHEREAS** the Plaintiff's Opposition to the same was due to be filed
2 with this Court on or before September 13, 2019; and

3 **WHEREAS** the Defendant's Motion is currently set to be heard by this
4 Court on October 2, 2019 at 10:00 a.m.; and

5
6 **WHEREAS** in the interest of conserving judicial resources, the parties
7 request that the Motion Hearing be continued and the parties be offered
8 additional time to allow for additional settlement discussions in the hopes of
9 yielding a full and complete global resolution in this matter without the
10 Court's intervention; and

11 **WHEREAS** the court finds that good cause exists to continue the Motion
12 Hearing to a later date.

13
14 *Therefore,*

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IT IS FURTHER ORDERED that the Motion Hearing regarding Defendant's Motion For Appointment Of A Parenting Coordinator, Issuance Of A Behavior Order, For Other Custody Orders And For Defendant's Attorney's Fees And Costs Incurred Herein, And For Related Relief, currently set for October 2, 2019 at 10:00 a.m., shall be continued to the 12th day of November at the hour of 10:00 a.m.

DATED this 25 day of September, 2019

Rebecca Burks
DISTRICT COURT JUDGE

Submitted by:

FORD & FRIEDMAN

MATTHEW FRIEDMAN, ESQ.

Nevada Bar No. 11571

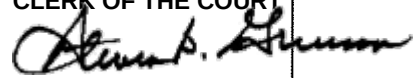
2200 Paseo Verde Parkway, Suite 350

Henderson, Nevada 89052

Attorney for Defendant

110

110



1 NTSO
2 MATTHEW H. FRIEDMAN, ESQ.
3 Nevada Bar No. 11571
4 FORD & FRIEDMAN
5 2200 Paseo Verde Pkwy, Suite 350
6 Henderson, Nevada 89052
7 Telephone: (702) 476-2400
8 Facsimile: (702) 476-2333
9 mfriedman@fordfriedmanlaw.com
10 Attorney for Defendant

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DISTRICT COURT, FAMILY DIVISION
CLARK COUNTY, NEVADA

ERICH M. MARTIN,
Plaintiff,

Case No: D-15-509045-D
Dept: C

vs.

RAINA L. MARTIN,
Defendant.

NOTICE OF ENTRY OF STIPULATION AND ORDER TO CONTINUE
MOTION HEARING

Please take notice, the following “*Stipulation and Order to Continue Motion Hearing*” was entered, in the instant matter, on the 26th day of September, 2019.

...

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...

1 A true and correct copy of said order is attached hereto as "Exhibit A".

2 DATED this 1st day of ~~September~~^{October}, 2019.

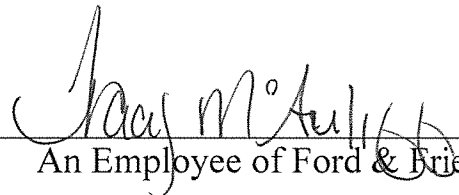
3 **FORD & FRIEDMAN**

4
5
6 
7 MATTHEW H. FRIEDMAN, ESQ.
8 Nevada Bar No.: 11571
9 2200 Paseo Verde Parkway, Suite 350
10 Henderson, Nevada 89052
11 T: (702) 476-2400 / F: (702) 476-2333
12 *Attorneys for Defendant*
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CERTIFICATE OF SERVICE

I hereby certify that on the 1 day of ^{OCTOBER}~~September~~, 2019 I served a true and correct copy of the foregoing **"Notice of Entry of Stipulation and Order to Continue Motion Hearing"** via the United States Postal Service to the following recipient:

Erich Martin
3815 Little Dipper Dr.
Fort Collins, Colorado 80528
Plaintiff in Proper Person


An Employee of Ford & Friedman

“EXHIBIT A”



1 **SAO**
2 **MATTHEW H. FRIEDMAN, ESQ.**
3 Nevada Bar No. 11571
4 mfriedman@fordfriedmanlaw.com
5 **FORD & FRIEDMAN**
6 2200 Paseo Verde Parkway, Suite 350
7 Henderson, Nevada 89052
8 Telephone: (702) 476-2400
9 Facsimile: (702) 476-2333
10 *Attorneys for Defendant*

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

14 **ERICH M. MARTIN,**

15 Plaintiff,

16 vs.

17 **RAINA L. MARTIN,**

18 Defendant.

CASE NO.: D-15-509045-D

DEPT. NO.: C

19 **STIPULATION AND ORDER TO**
20 **CONTINUE MOTION HEARING**

21 **COME NOW** Plaintiff Erich Martin, in proper person, and Defendant
22 Raina Martin, by and through her counsel of record Matthew H. Friedman, Esq.
23 of the law firm of Ford & Friedman, and hereby stipulate and request entry of
24 order as follows:

✓ 25 **WHEREAS** the Defendant filed a Motion For Appointment Of A
26 Parenting Coordinator, Issuance Of A Behavior Order, For Other Custody Orders
27 And For Defendant's Attorney's Fees And Costs Incurred Herein, And For
28 Related Relief on or about August 27, 2019; and

1 **WHEREAS** the Plaintiff's Opposition to the same was due to be filed
2 with this Court on or before September 13, 2019; and

3 **WHEREAS** the Defendant's Motion is currently set to be heard by this
4 Court on October 2, 2019 at 10:00 a.m.; and

5
6 **WHEREAS** in the interest of conserving judicial resources, the parties
7 request that the Motion Hearing be continued and the parties be offered
8 additional time to allow for additional settlement discussions in the hopes of
9 yielding a full and complete global resolution in this matter without the
10 Court's intervention; and

11 **WHEREAS** the court finds that good cause exists to continue the Motion
12 Hearing to a later date.

13
14 *Therefore,*

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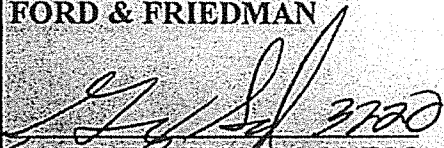
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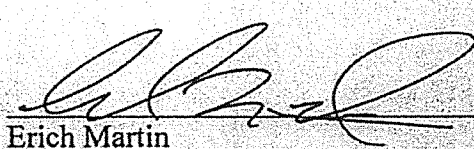
1 **IT IS HEREBY STIPULATED AND AGREED** that the Motion Hearing
2 regarding Defendant's Motion For Appointment Of A Parenting Coordinator,
3 Issuance Of A Behavior Order, For Other Custody Orders And For Defendant's
4 Attorney's Fees And Costs Incurred Herein, And For Related Relief, currently set
5 for October 2, 2019 at 10:00 a.m., shall be continued and reset to the Court's first
6 available date after October 23, 2019.

8 DATED this 25th day of September,
9 2019

DATED this 25th day of September,
2019

10 **FORD & FRIEDMAN**

11 
12 **MATTHEW FRIEDMAN, ESQ.**
13 Nevada Bar No. 11571
14 2200 Paseo Verde Parkway, Suite 350
15 Henderson, Nevada 89052
16 *Attorney for Defendant*

11 
12 **Erich Martin**
13 3815 Little Dipper Dr.
14 Fort Collins, Colorado 80528
15 *Plaintiff in Proper Person*

16 **ORDER**

17 The Court, having considered the above STIPULATION AND
18 **ORDER TO CONTINUE MOTION HEARING**, having read the papers and
19 pleadings on file herein, being well advised in the premises, and for good cause
20 appearing, hereby finds and orders as follows:

21 **IT IS HEREBY ORDERED** that the above stipulation shall be
22 **ADOPTED** and **INCORPORATED** by reference as an order of this Court.

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EXMT

Name: Erich Martin
Address: 3815 Little Dipper Dr
Fr. Collins, CO 80528
Telephone: (307) 275-6343
Email Address: emartin2617@gmail.com
In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Erich Martin
Plaintiff.
vs.
Raina Martin
Defendant.

CASE NO.: D-15-509045-D
DEPT: C

EX PARTE MOTION FOR CONTINUANCE

(Your name) Erich Martin, the (☒ check one) ☒ Plaintiff
/ ☐ Defendant in Proper Person, moves this Honorable Court for an Order granting a
continuance. This motion is brought in good faith and is based on the attached Points and
Authorities, Declaration of Movant, the papers and pleadings on file herein, and such further
evidence and argument that may be requested.

DATED November 7th, 2019.

Submitted By: (your signature)

(print your name)

[Signature]
Erich Martin

POINTS AND AUTHORITIES

A Party may request a continuance of a hearing through an ex parte motion. EDCR 5.514(c). This ex parte motion seeks to continue a hearing on the court's calendar.

FACTS AND ARGUMENT

1. **Current Court Date.** There is a court date set for November 12, 2019 at 10:00 AM

2. **Prior Requests.**

- This is my first request to change the court date.

3. **Attempt to Resolve.** *The other party will not agree to continue hearing date because:*

On 07 November 2019 a telephone call was initiated to continue negotiations with opposing counsel Mr. Matthew Friedman. I was under the impression from negotiations that we had resolved the primary concerns that had been raised. Mr. Friedman informed me on 07 November 2019, that he felt we would not reach an agreement. When I learned that an agreement could not be reached, I then asked Mr. Friedman to agree to a continuance on the hearing so that I may file a response to the motion and prepare to be able to represent myself in court. He said that he would not agree to the continuance.

4. **Reason for Continuance.** *I would like to change the court date because.*

I have in good faith been attempting to represent myself and negotiate with opposing counsel to reach an agreement prior to a hearing. As of November 7, 2019, just 5 days before the court date I have been informed by opposing counsel that negotiations will be unsuccessful. I had not filed a written response without an attorney because I believed our good faith negotiations

would resolve the outstanding issues. I informed opposing counsel that I was anxious to reach a settlement in a timely manner so that in the event that we did not reach an agreement I would have time to prepare a response to the motion. I only learned that settlement offers had been rejected after the time that my written response would have been due. Opposing counsel waited until the last minute to inform me of his client's rejection of settlement terms, resulting in my being unable to file a written response after learning for the first time that settlement negotiations had failed. I am respectfully asking the court to please allow me adequate time in order to file a response to the motion and prepare for court.

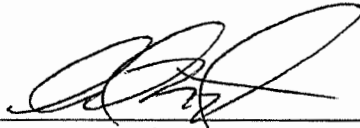
Ms. Martin's motion addresses issues that affect our son's ability to communicate with me and maintain a positive relationship with both parents. Now that I know settlement will not occur, I would like an opportunity to address the factual and legal assertions made by Ms. Martin so that the Court can make a fully-informed decision that will be in the best interest of our son, as opposed to a decision that is based on incomplete information and may be contrary to the best interest of our son.

5. New Date Requested. If granted, I ask the court if possible to reschedule the court date for a date and time after January 6th, 2020.

I respectfully ask the Court to continue the court date as requested above, and any other relief the Court finds appropriate.

DATED November 7, 2019

Submitted By: _____


Erick Martin

DECLARATION IN SUPPORT OF MOTION

I declare, under penalty of perjury:

a. I have read the foregoing motion, and the factual averments it contains are true and correct to the best of my knowledge, except as to those matters based on information and belief, and as to those matters, I believe them to be true. Those factual averments contained in the reference filing are incorporated here as it set forth in full.

b. Additional facts to support my requests include: N/A

c. Any Exhibit(s) in support of this Motion will be filed separately in an Exhibit Appendix

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED November 7, 2019.

Submitted By: _____


Erich Martin

112

112

Steven D. Grierson

ORDR

Name: Erich Martin
Address: 3815 Little Dipper Dr
Ft. Collins, CO 80528
Telephone: (303) 275-6343
Email Address: emartin2617@gmail.com
In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

Erich Martin
Plaintiff.
vs.
Raina Martin
Defendant.

CASE NO.: D-15-509045-D
DEPT: C

ORDER GRANTING CONTINUANCE

The Court having considered the ex parte motion for a continuance and good cause appearing.

IT IS HEREBY ORDERED that the hearing presently scheduled for (current court date) November 12, 2019 at (time) 10:00 ☒ am / ☐ pm SHALL BE CONTINUED to (judge will fill in new court date) DECEMBER 10, 2019 at (time) 11:00 ☒ am / ☐ pm. PLAINTIFF'S OPPOSITION IS DUE 11.26.19;

The moving party shall serve a copy of this order on the opposing party / opposing DEFENDANT'S counsel and file a Notice of Entry of Order. REPLY IS DUE 12.03.19. (RLB)

DATED this 8th day of NOVEMBER, 2019.

Rebecca Burton
DISTRICT COURT JUDGE

Respectfully Submitted:

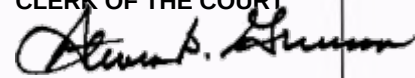
(Your signature)

(Your name)

Erich Martin

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NEO

DISTRICT COURT
CLARK COUNTY, NEVADA

* * *

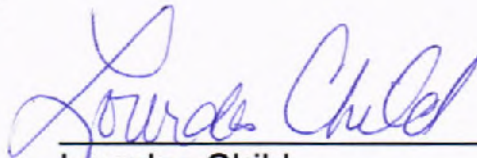
Erich M Martin, Plaintiff
vs.
Raina L Martin, Defendant.

Case No: D-15-509045-D
Department C

NOTICE OF ENTRY OF ORDER

Please take notice that an ORDER GRANTING CONTINUANCE
was entered in the foregoing action and the following is a true and
correct copy thereof.

Dated: November 08, 2019



Lourdes Child
Judicial Executive Assistant
Department C

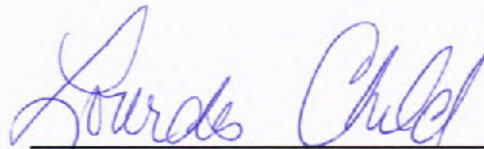
CERTIFICATE OF SERVICE

I hereby certify that on the above file stamp date:

☒ I mailed, via first-class mail, postage fully prepaid, the foregoing NOTICE OF ENTRY OF ORDER to:

Erich M Martin
3815 Little Dipper Drive
Fort Collins, CO 80528

Matthew H. Friedman, Esq.
2200 Paseo Verde Parkway, Suite 350
Henderson, NV 89052



Lourdes Child
Judicial Executive Assistant
Department C

Steven D. Grierson

ORDR

Name: Erich Martin
Address: 3815 Little Dipper Dr
Fr. Collins, CO 80528
Telephone: (303) 275-6343
Email Address: emartin2617@gmail.com
In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

Erich Martin
Plaintiff.
vs.
Raina Martin
Defendant.

CASE NO.: D-15-509045-D
DEPT: C

ORDER GRANTING CONTINUANCE

The Court having considered the ex parte motion for a continuance and good cause appearing.

IT IS HEREBY ORDERED that the hearing presently scheduled for (current court date) November 12, 2019 at (time) 10:00 ☒ am / ☐ pm SHALL BE CONTINUED to (judge will fill in new court date) DECEMBER 10, 2019 at (time) 11:00 ☒ am / ☐ pm. PLAINTIFF'S OPPOSITION IS DUE 11.26.19;

The moving party shall serve a copy of this order on the opposing party / opposing DEFENDANT'S counsel and file a Notice of Entry of Order.

DATED this 8th day of NOVEMBER, 2019.

REPLY IS DUE
12.03.19.
(RUB)

Rebecca Burton
DISTRICT COURT JUDGE

Respectfully Submitted:

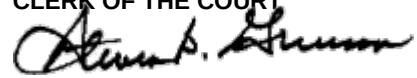
(Your signature)

(Your name)

Erich Martin

114

114



MOT
Name: Erich Martin
Address: 3815 Little Dipper Dr
Ft. Collins, CO 80528
Telephone: (307) 275-6343
Email Address: emartin2617@gmail.com
Self-Represented

DISTRICT COURT
CLARK COUNTY, NEVADA

ERICH MARTIN

Plaintiff,

vs.

RAINA MARTIN

Defendant

CASE NO:15-D-509045-D

DEPT: C

DATE OF HEARING:

TIME OF HEARING:

Oral Argument Requested: Yes

**COUNTERMOTION TO DEFENDANT'S MOTION FOR APPOINTMENT
OF A PARENTING COORDINATOR, ISSUANCE OF A BEHAVIOR
ORDER, FOR OTHER CUSTODY ORDERS AND FOR DEFENDANT'S
ATTORNEY'S FEES AND COSTS INCURRED HEREIN, AND FOR
RELATED RELIEF AND MOTION TO MODIFY VISITATION AND
NIGHTLY PHONE CALLS.**

COMES NOW Plaintiff, Erich Martin, and hereby files this Counter Motion to
Defendant's Motion For Appointment Of A Parenting Coordinator, Issuance Of A Behavior
Order, For Other Custody Orders And For Defendant's Attorney's Fees And Costs Incurred
Herein, And For Related Relief.

Erich Martin, in Proper Person, moves this Court for an Order modifying visitation and nightly phone calls.

1. I have tried to resolve both of these issues on multiple occasions with Defendant prior to filing this motion.
2. All attempts to resolve this issue have been useless as the Defendant is unwilling to negotiate on these matters in order to reduce the contention of the co-parenting relationship.

DATED this 26th day of November 2019.

Submitted By: 

ERICH MARTIN

POINTS AND AUTHORITIES

I.

INTRODUCTION

Based on Defendant, Raina Martin's ("Defendant") claims in her Motion that Plaintiff, Erich Martin ("Erich") has resisted at every turn to Defendant's attempt to co-parent, thereby destroying the co-parenting relationship. In reality, it is *Defendant* who has attempted to steal Erich's voice as a father. Defendant has a history of withholding the parties' minor child from Erich and continually wrestling the plain meaning of the parties' Decree of Divorce to read as she interprets it, which has been seen by this Court in prior proceedings.

Rather than allow Defendant's unsubstantiated claims progress, Erich petitions the Court as follows.

II.

COUNTER MOTION AND PETITIONS

A. DEFENDANT *HAS* WITHHELD VISITATION

Erich has attached multiple messages requesting visitation for Nathan to Erich in October 2019, due to the fact that he was unable to have Nathan for Labor Day. For two weeks, Defendant ignored these requests, which were 46 days prior to the proposed visitation weekend of 24-27 OCT 19. *See* Erich's Exhibit C outlining the multiple requests. Much like Defendant's claims back in February 2016, which Defendant was found to be in violation of visitation rights, she claimed "I'm not denying you visitation. You can come here to see your son." This has been harsh, not only for Erich, but more so for Nathan. It is evident that the Defendant attempts to negate Erich's relationship with Nathan at all possible events.

B. VISITATIONS WITH ERICH SHOULD BE WHERE ERICH CHOOSES EVERY TIME IN ORDER TO AVOID CONFUSION

Erich requests that the Court enter an order allowing him to exercise parent-time at the location of his choosing- his home- instead of requiring continued visitation at hotel rooms in Las Vegas. This will facilitate both parties in avoiding confusion as to where and when Nathan is allowed to visit Erich. More importantly, it will allow the minor child to be better involved in Erich's home life and family traditions.

Erich has minimal time with Nathan because Defendant demands that he visit Nathan in Las Vegas every other month as the original Decree states. When the Decree entered, Erich was living as a single-parent. However, Nathan is now over 9 years old and enjoys visiting his dad

and family in Colorado. Considering that Nathan has brothers and sisters with whom he loves to visit, and an actual home with It is important Nathan be afforded to maximize his visits with his entire family. Travelling to Las Vegas compounds the cost of dining out, price of flights, and obtaining a hotel which isn't feasible. Erich would request a modification to the Decree and allow all visits to be with him wherever Erich requests, and the financial division remain the same as it is for all of Nathan's visits. The amount of notification time shall remain the same at 30 days, which Erich has remained in compliance.

C. NON-CUSTODIAL PHONE CALLS SHOULD ONLY BE TWICE PER WEEK

These calls have been the other major source of contention and Erich requests to minimize the frequency of calls from every day to only 2-3 times a week. This would reduce friction points for the parents and based on the fact that Erich has little time with Nathan, the Defendant's calls interrupts that valuable time. On top of that, the Defendant attempts to negate Nathan's time with Erich during these calls and speaks derogatorily about Erich, or encourages feelings of guilt for being away from his mother (Defendant). This is not fair to Nathan or Erich in their relationship. These are rather petty things that have caused conflict. Therefore, minimizing the daily calls would assist in minimizing conflict, further supporting the fact that a parenting coordinator is unnecessary.

D. BEHAVIOR ORDER IS NECESSARY DUE TO DEFENDANT'S HARASSMENT OF ERICH'S CHAIN OF COMMAND/EMPLOYERS

Defendant makes claims that a behavior order is necessary, but omits her incessant disparaging comments of Erich via OFW messages and to Erich's commanders and employers. Erich agrees that there needs to be a behavior order in place, especially for Defendant.

1. Defendant makes hurtful comments to Nathan about his father, Erich.
2. July 2017, Defendant's domestic partner made threats to call Erich's Chain of Command.
3. During March and April 2018, Defendant calls Erich's employers in attempts to get Erich fired.
4. Defendant leaves out the fact that she attempts to illegally avoid a writ of execution and garnishment, which required Erich to contact Defendant's previous employment at Desert Breeze Dental in September 2017 through Las Vegas' Constable.

Julie will no longer contact the Defendant directly. With the Behavior Order in place, this will further reduce the need for a parenting coordinator.

E. DEFENDANT IS IN VIOLATION OF HER JOINT LEGAL CUSTODY RESPONSIBILITIES AND JUDGMENT SHOULD BE IN FAVOR OF ERICH

Defendant attaches a string of Our Family Wizard ("OFW") medical expenses surrounding various charges for the parties' minor child. Repeatedly, the Defendant has disobeyed the Divorce Decree ("Decree"). The Decree required that she consult with Erich on educational, medical, and other matters- *See* Decree 2: 19-28 and 3: 1-8. As is evidenced in the exhibits herein, since July 2016, and currently, Defendant is consistently dishonest about the nature of medical appointments and treatments, and she has concealed her unilateral decisions to make significant educational decisions. The following is a summary of the multiple violations:

1. Defendant switched Nathan's schools three separate times in the last four years, as recent as July 2019. Each time she has done so concealing the facts about it.

2. In July 2016, and again in June 2017, Defendant took Nathan to an optometrist and bought prescription glasses without consulting me. She used the wrong insurance, increasing out-of-pocket expense.
3. During November 2019, she took Nathan to dermatology and ear-nose-throat appointments without consulting Erich or involving Erich in the matters.
4. The Defendant refuses to acknowledge the fact that she did not use Erich's insurance provided for Nathan to conduct the purchase of the glasses. On top of this, the multitude of OFW emails where Erich has requested that Defendant abide by the Decree in reference to the joint decision-making when it comes to medical appointments. The language of the parties' Decree is clear.
5. The Defendant's claims are exaggerated in reference to Erich not allowing Nathan to wear his glasses. Nathan cannot wear his glasses while swimming or when the possibility of breaking his glasses was high.

F. REQUIREMENT FOR ALCOHOL MONITORING SHOULD BE ELIMINATED

Erich has not consumed alcohol in almost four years. The previous requirement for Erich to conduct alcohol monitoring is no longer needed. Since entry of the order, Erich has successfully completed a rigorous outpatient treatment program. He successfully completed all probation requirements ahead of schedule, and interlock device requirements. As a result of Erich's four years of sobriety, there has been no alcohol-related problems or negative events in the past four years. Consistent with continued sobriety maintenance, Erich has served as an Ambassador for various Special Operations outreach programs as an advocate for sobriety among soldiers and their families.

Erich is also a member of the Church of Jesus Christ Latter Day Saints, that holds a standard to sobriety, which he fully abides. Erich has also served through the Church to members in the community that struggle with PTSD and substance abuse.

Based on Erich's dedication to sobriety, his extensive family support, along with other community support networks, alcohol monitoring requirement is unnecessary. Erich asks the Court to eliminate this mandate further.

I respectfully ask the Court to grant me the relief requested above, and any other relief the Court finds appropriate.

DATED November 26, 2019

Submitted By:

A handwritten signature in blue ink, appearing to read 'Erich Martin', with a long horizontal line extending to the right.

ERICH MARTIN

DECLARATION IN SUPPORT OF MOTION

I declare, under penalty of perjury:

- a. I have read the foregoing motion, and the factual averments it contains are true and correct to the best of my knowledge, except as to those matters based on information and belief, and as to those matters, I believe them to be true. Those factual averments contained in the reference filing are incorporated here as it set forth in full.
- b. Additional facts to support my requests include: *See* Erich's Reply to Defendant on 26NOV19.
- c. Refer to Exhibits Appendix by Erich Martin filed on 26NOV19.

**I declare under penalty of perjury under the law of the State of Nevada that the foregoing
is true and correct.**

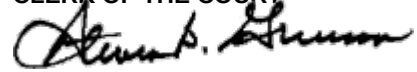
DATED November 26, 2019.

Submitted By: _____

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke, positioned above the signature line.

115

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RPLY
Name: Erich Martin
Address: 3815 Little Dipper Dr
Ft. Collins, CO 80528
Telephone: (307) 275-6343
Email Address: emartin2617@gmail.com
Self-Represented

DISTRICT COURT
CLARK COUNTY, NEVADA

ERICH MARTIN

Plaintiff,

vs.

RAINA MARTIN

Defendant

CASE NO:15-D-509045-D

DEPT: C

DATE OF HEARING: 10DEC19

TIME OF HEARING: 11:00AM

Oral Argument Requested: Yes

**REPLY AND OPPOSITION TO DEFENDANT'S MOTION FOR
APPOINTMENT OF A PARENTING COORDINATOR, ISSUANCE OF A
BEHAVIOR ORDER, FOR OTHER CUSTODY ORDERS AND FOR
DEFENDANT'S ATTORNEY'S FEES AND COSTS INCURRED HEREIN,
AND FOR RELATED RELIEF.**

COMES NOW Plaintiff, Erich Martin, and hereby files this Reply and Appendix of Exhibits to Plaintiff's Reply to Defendant's Motion For Appointment Of A Parenting Coordinator, Issuance Of A Behavior Order, For Other Custody Orders And For Defendant's Attorney's Fees And Costs Incurred Herein, And For Related Relief.

This Reply, Opposition, and Appendix is based upon the pleadings on file herein, the affidavits hereto, and the oral argument of Erich Martin at the time of hearing.

DATED this 26th day of November 2019.

Submitted By: 
ERICH MARTIN

POINTS AND AUTHORITIES

I.

INTRODUCTION

Defendant, Raina Martin ("Defendant") claims in her Motion that Plaintiff, Erich Martin ("Erich") has resisted at every turn to Defendant's attempt to co-parent, thereby destroying the co-parenting relationship. In reality, it is *Defendant* who has attempted to steal Erich's voice as a father. Defendant has a history of harassment, withholding the parties' minor child from Erich and continually wresting the plain meaning of the parties' Decree of Divorce to her unilateral benefit, which has been seen by this Court in prior proceedings.¹

Rather than allow Defendant's unsubstantiated claims go unanswered, Erich replies as follows.

II.

REPLY AND OPPOSITION

A. THE PARTIES DO NOT REQUIRE A PARENTING COORDINATOR

¹ For example, Defendant refused to acknowledge that her entering into a domestic partnership terminated my alimony obligation to her- even after Judge Burton told her in open court she could not legally defend her position. She had concealed the domestic partnerships from me and the court, resulting in the overpayment of alimony, and she required several court hearings to address the issue. As a result, the Court awarded me a judgment for my overpayment of alimony and attorney fees associated with that stage of litigation.

Erich acknowledges that the relationship has been highly contentious. The contention derives primarily from Defendant's repeated unilateral decisions and the roadblocks she creates to obstruct Erich's parent-time. Defendant continues to exclude Erich from the decision-making process, which will be discussed later herein. Defendant has created situations that have made visits with Nathan very difficult. The proceedings held in 2016, relating to Defendant's denying visitation and her concealment of the fact that she was in a domestic partnership, demonstrate the problems she causes. The Court awarded Erich attorney fees for both issues because Defendant refused to follow the Court's order or otherwise act reasonably.

The Defendant has a history of dragging out litigation, causing the parties to incur unnecessary attorney's fees, and using mediation when it is not warranted. Defendant will continue to do this with a parenting coordinator in order to exhaust time and money of the legal system. It is evident that Erich and Defendant, have been able to negotiate at most points concerning Nathan's visits. *See* Erich's messages from Exhibit A. The co-parenting contention only exists when Defendant attempts to manipulate the interpretation of the Divorce Decree ("Decree") or deny visitation, which has happened as recently as October 2019. Defendant makes dishonest accusations that Erich has unilaterally decided to take make up time. At no point has Erich ever done this action, and at every need to conduct make up time, Erich has cordially negotiated the dates and times of the visitations. All of Defendant's claims about the matters surrounding summer visitation 2018, through Spring Break 2019, are negated by the provided OFW correspondence, which displays Erich's willingness to work with Defendant. The following is a portion of a 28AUG19, OFW email chain of Erich's negotiations with Defendant:

On Wed, 08/28/19 at 11:50 AM, Erich Martin wrote:

To: Raina Martin

Subject: Nathan's visit

Message:

Raina,
Life has been crazy busy and we just realized that this weekend is Labor Day. I would like to have Nathan stay and send him back to you on Sunday. It would really mean a lot to me to be able to let him be here with us. I will talk to his school and get the absence excused. His teacher assured me he will be just fine. I am already supposed to have him for the holiday this just gives us a couple extra days. It would be greatly appreciated if will accommodate this.
Thanks,
Erich

On Wed, 08/28/19 at 2:44 PM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Nathan's visit

Message:

Erich,

I can't say I agree with him missing 3 days of school on the third week of 4th grade. If you would like to have him, you'll need to communicate with his teacher as he wasn't prepared for a 3 day absence. We also have plans on Sunday- if you decide to keep him, please have him home Saturday night.

Thanks,
Raina

To: Raina Martin

Subject: RE: Nathan's visit

Message:

Unfortunately, we weren't able to get childcare worked out for the next two days. So, I will be taking him to the airport tonight. I truly appreciate you being willing to work with me on this matter.

Erich

B. DEFENDANT SHOULD BE RESPONSIBLE FOR PAYMENT OF PARENTING COORDINATOR

If the Court finds that a parenting-coordinator is required, it should solely be at the expense of the Defendant. Erich should not be punished for the Defendant's poor behavior. It is

wholly apparent that Defendant has been the individual in violation of the Decree on multiple occasions. She has changed the child's school without notice; she seeks medical care without consulting Erich; she incurred non-reimbursable expenses that she was required to run through insurance; she has denied parent-time or unreasonably limited it. Defendant's misconduct has been the primary cause of contention. If a parenting coordinator is the natural consequence of the inability to follow the Decree, then it naturally follows that she should bear the expense.

C. DEFENDANT'S MEDICAL CLAIMS SHOULD BE REDUCED

Defendant's claims to medical expenses should be reduced because of her failure to follow the Decree and her election to incur unreasonable expenses. If Defendant would have utilized the proper insurance, along with not choosing to purchase the most expensive glasses, there would have been no issue here. However, Defendant has neglected to abide by the Decree in multiple circumstances, creating unnecessary out-of-pocket expenses. Furthermore, she has ignored the parameters of insurance provisions in order to exceed expenses. Erich provides vision coverage that provides a free optometrist visit each year. If she takes our son to the optometrist too early, then insurance will not pay for the visit. Erich has communicated these facts to Defendant. The Decree requires that she prevent unreimbursed expenses by utilizing insurance coverage. *See* Decree. Instead, she sought- without consulting Erich- optometrist care just a few weeks before insurance would have covered the visit. If she had followed the Decree, neither party would have incurred an out-of-pocket expense. I should not be required to reimburse her an entirely avoidable expense.

Moreover, the expense incurred for the minor child's eyeglasses is unreasonable. Without seeking Erich's input, Defendant elected to purchase designer brand, individually engraved

eyeglasses that cost over \$400. Erich agrees that eyeglasses are a reasonable expense, but the extravagance was entirely unreasonable for a nine-year-old child. While Defendant may be able to afford the expense with a combined household income over \$300,000, I cannot afford designer, customized frames. I have recently transitioned from full-time military employment into a new career. Based on what is reasonable for Nathan's glasses, Erich should be ordered to pay no more than \$100 of the expense, which represents a reasonable expense for eyeglasses for a young child.

D. DEFENDANT HAS MISLED THE COURT REGARDING CONVERSATION WITH ERICH'S WIFE, JULIE MARTIN

Erich's wife, Julie Martin ("Julie"), has been actively involved in parenting Nathan with Erich for several years. Defendant claims that Julie's involvement has been the source of conflict, but the Defendant ignores the fact that Defendant's conduct has been the subject of contempt proceedings. Defendant has attached a string of texts that attempt to mislead the court and portray Julie as a horrible person. However, Defendant has grossly exaggerated the evidence provided to the court. The Defendant has manipulated the amount of conversation that occurs, which in reality totals only four occasions over the past five years, the last of which was July 2017. Defendant has quadruplicated conversations, in an effort to make the situation appear enflamed. Defendant has deleted portions of her personal comments to remove context and obfuscate her own communications. The Defendant doesn't reference the context surrounding these conversations, and is misleading based on the following:

1. The Defendant omits her poor conduct in multiple messages towards Erich.

“You're [Julie] just as insane as he is....”

“There’s always a reason you fail...”

2. Defendant omits the portions of her domestic partner’s threatening texts to Erich.

“I [Anthony Bricker] will be contacting your chain of command and we can then discuss integrity then....”

3. Defendant hides the fact that one of Defendant’s texts was occurring during a time period when she was denying visitation and in violation of the Decree.

E. DEFENDANT *HAS* DENIED PRIVACY DURING PHONE CALLS, ERICH HAS PROVIDED PRIVACY

Defendant claims that Erich denies Nathan privacy during phone calls. *See* Defendant's Motion 12: 22-28. However, in almost every instance that Erich has called Nathan is rarely afforded privacy to speak with Erich. Furthermore, Defendant will ignore calls from Erich and then calls back when they (Defendant and Nathan) are in the car or at a restaurant. This occurs over 50% of the time. Defendant also omits yelling at Erich on multiple occasions during FaceTime or phone calls.

Regarding the issue of Defendant’s claims to time zone request, the 8:00pm PST is negotiable. Utilizing the wording in the Decree was necessary to take a hard stance on issues with Defendant. This was due to Defendant not answering or calling back at 11:30 pm for Erich.

F. A BEHAVIOR ORDER IS NECESSARY

Erich agrees that the Court should hold the parties to a higher standard of communication and conduct. With the Behavior Order in place, this will further reduce the need for a parenting coordinator.

G. DEFENDANT HAS DENTAL COVERAGE FOR NATHAN AND HAS REFUSED ERICH'S COVERAGE FOR NATHAN

Defendant claims Erich has not provided dental coverage for Nathan, however, Defendant leaves out several critical points to this matter. First, the Defendant has not once used previous dental insurance provided by Erich for Nathan. This is due to the fact that Defendant works for a dental practice and receives dental care there for no cost. Also, Julie works for a pediatric dentist and is able to obtain any dental work without cost. As a result, the parties, if they cooperate with each other, will not have to incur any out-of-pocket expense for dental care even without dental insurance. On multiple occasions, Erich has informed Defendant that their child can receive dental care without cost through Julie's dental office if Defendant's office will not cover these items. Defendant's motion seeking an order that Erich pay for dental insurance, therefore, only serves to create an entirely unnecessary expense for Erich. The request appears to be punitive instead of constructive.

H. DEFENDANT IS NOT ENTITLED TO ATTORNEY'S FEES

Erich should not endure the financial burden of attorney fees because the current problems have primarily resulted from Defendant's misconduct. Parenting time agreements were made by both parties, and as shown by the attached communications no parent-time was taken by force or without consent. Erich certainly did not force Defendant to place the child on an airplane against her will. Defendant consistently makes unilateral decisions surrounding Nathan with regards to education, medical care, and other matters. Erich's voice continues to be stifled by Defendant as she refuses to include Erich until after the fact.

Defendant is dishonest about events that have occurred in the tenure of the co-parenting relationship. Defendant's exhibits, which are made to be as long as a book, are merely a few conversations printed repeatedly. They falsely represent the context of the situations. Furthermore, the variety of claims by Defendant referencing unilateral decisions by Erich for visitation are fabricated. At every instance, Erich has shown the Court that proper steps for co-parenting have existed, or where Defendant has attempted to mislead the Court. As is evidenced through the various OFW messages, utilizing a parenting coordinator is unnecessary based on the parties' ability to negotiate visitation and matters that surround the joint-legal custody decisions discussed.

I respectfully ask the Court to grant me the relief requested above, and any other relief the Court finds appropriate.

DATED November 26, 2019

Submitted By:

A handwritten signature in blue ink, appearing to read 'Erich Martin', followed by a long horizontal line.

ERICH MARTIN

DECLARATION IN SUPPORT OF MOTION

I declare, under penalty of perjury:

- a. I have read the foregoing motion, and the factual averments it contains are true and correct to the best of my knowledge, except as to those matters based on information and belief, and as to those matters, I believe them to be true. Those factual averments contained in the reference filing are incorporated here as it set forth in full.
- b. Additional facts to support my requests include: *See* Erich's Counter Motion submitted on 26NOV19.

c. Any Exhibit(s) in support of this Motion will be filed separately in an Exhibit Appendix: *See* Erich's Exhibit Appendix filed on 26NOV19.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

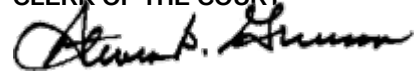
DATED November 26, 2019.

Submitted By: 

ERICH MARTIN

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MISC
Name: Erich Martin
Address: 3815 Little Dipper Dr
Ft. Collins, CO 80528
Telephone: (307) 275-6343
Email Address: emartin2617@gmail.com
Self-Represented

DISTRICT COURT
CLARK COUNTY, NEVADA

ERICH MARTIN

Plaintiff,

vs.

RAINA MARTIN

Defendant

CASE NO:15-D-509045-D

DEPT: C

DATE OF HEARING: 10DEC19

TIME OF HEARING: 11:00AM

NOTICE OF INTENT TO APPEAR BY COMMUNICATION DEVICE

Erich Martin, the Plaintiff, submits this Notice of Intent to Appear by Communication Equipment for the Motion Hearing currently scheduled for DECEMBER 10th, 2019.

For the purpose of this appearance I can be reached at the following phone number: (307) 275-6343. My email address (for scheduling purposes) is emartin2617@gmail.com. I understand it is my responsibility to ensure that I can be reached at this telephone number on the date and time of the hearing. I also understand that due to the unpredictable nature of court proceedings,

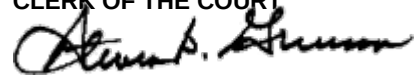
my hearing may be called at a time other than the scheduled time. Further, I understand that my failure to be available at the above telephone number will constitute a nonappearance.

DATED this 25th day of November 2019.

Submitted By: 
ERICH MARTIN

117

117



EXHS
Name: Erich Martin
Address: 3815 Little Dipper Dr
Ft. Collins, CO 80528
Telephone: (307) 275-6343
Email Address: emartin2617@gmail.com
Self-Represented

**DISTRICT COURT
CLARK COUNTY, NEVADA**

ERICH MARTIN
Plaintiff,

vs.
RAINA MARTIN
Defendant

CASE NO:15-D-509045-D
DEPT: C

DATE OF HEARING: 10DEC19
TIME OF HEARING: 11:00AM

EXHIBIT APPENDIX

ERICH MARTIN, the Plaintiff, submits the following exhibits in support of my COUNTER MOTION AND REPLY AND OPPOSITION TO DEFENDANT'S MOTION FOR APPOINTMENT OF A PARENTING COORDINATOR, ISSUANCE OF A BEHAVIOR ORDER, FOR OTHER CUSTODY ORDERS AND FOR DEFENDANT'S ATTORNEY'S FEES AND COSTS INCURRED HEREIN, AND FOR RELATED RELIEF. I understand that these are not considered substantive evidence in my case until formally admitted into evidence.

Table of Contents:

1. Exhibit A – Proof of Successful Negotiations Between Parties.
2. Exhibit B – Defendant's Violation of Joint Custody.

3. Exhibit C – Defendant’s Violation of Visitation.
4. Exhibit D – Defendant’s Misleading Evidence.
5. Exhibit E- Defendant’s Harassment of Erich.
6. Exhibit F – Defendant’s Complications of Phone Calls.
7. Exhibit G- Defendant is Not Entitled to Attorney Fees.

DATED this 26th day of November 2019.

Submitted By: 

CERTIFICATE OF MAILING

I, ERICH MARTIN declare under penalty of perjury under the law of the State of Nevada that on November 25th, 2019, I served this ***Exhibit Appendix*** by depositing a copy in the U.S. Mail in the State of Nevada, postage addressed to:

Raina Martin
2200 Paseo Verde Pkwy Ste #350
Henderson, NV 89052

DATED this 25th day of November 2019.

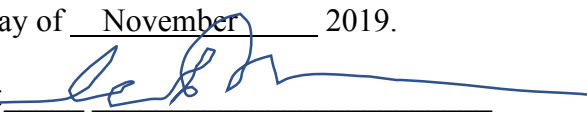
Submitted By: 

EXHIBIT A
PROOF OF ERICH'S PROPER CO-PARENTING AND
NEGOTIATIONS WITH DEFENDANT

ERICH COMPROMISES WITH DEFENDANT ON 28AUG19:

-
- From: Raina Martin
 - To:
 - Erich Martin (First View: 08/28/2019 7:53 PM)
 - Sent: 08/28/2019 7:51 PM
 - Subject: RE: Nathan's visit
-

Message:

Erich,

So sorry- we will be at the airport tonight.

Raina

On Wed, 08/28/19 at 5:51 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Nathan's visit

Message:

Unfortunately, we weren't able to get childcare worked out for the next two days. So I will be taking him to the airport tonight. I truly appreciate you being willing to work with me on this matter.

Erich

On Wed, 08/28/19 at 4:57 PM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Nathan's visit

Message:

Erich,

If you can get him in a little earlier, that'd be great. Just let me know final flight info.

Please be sure to make arrangements with Mr. Allen for homework as it is still so early in the school year. Let me know what homework he's missing.

Thanks,

Raina

On Wed, 08/28/19 at 4:50 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Nathan's visit

Message:

We could have him back by 7:50pm on Monday.

Erich

On Wed, 08/28/19 at 4:48 PM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Nathan's visit

Message:

Erich,

Sorry- we will be out of town Sunday until a Monday morning. Any way you can do Monday though?

RA000931

Raina

On Wed, 08/28/19 at 4:46 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Nathan's visit

Message:

If I get him back at 7:30pm on Sunday night will that work? Thanks for working with me here.

Erich

On Wed, 08/28/19 at 4:40 PM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Nathan's visit

Message:

Erich,

What about the afternoon on Monday?

Raina

On Wed, 08/28/19 at 4:21 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Nathan's visit

Message:

Raina,

Well, I greatly appreciate you being willing to work with me, but the cost of flights are far too expensive to get him back to you all on Saturday. Mr. Allen said he could send the homework to me if you all change your mind.

Otherwise, I will be putting him on his flight tonight. Thanks.

Erich

On Wed, 08/28/19 at 4:18 PM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Nathan's visit

Message:

Erich,

Unfortunately, not this weekend.

Raina

On Wed, 08/28/19 at 3:33 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Nathan's visit

Message:

By chance would your plans on Sunday have you in Utah? If so, perhaps we could drop him to you. We are thinking about going to visit some family over there.

Erich

On Wed, 08/28/19 at 2:44 PM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Nathan's visit

Message:

Erich,

I can't say I agree with him missing 3 days of school on the third week of 4th grade. If you would like

RA000932

to have him, you'll need to communicate with his teacher as he wasn't prepared for a 3 day absence. We also have plans on Sunday- if you decide to keep him, please have him home Saturday night.

Thanks,
Raina

On Wed, 08/28/19 at 11:50 AM, Erich Martin wrote:

To: Raina Martin

Subject: Nathan's visit

Message:

Raina,

Life has been crazy busy and we just realized that this weekend is Labor day. I would like to have Nathan stay and send him back to you on Sunday. It would really mean alot to me to be able to let him be here with us. I will talk to his school and get the absence excused. His teacher assured me he will be just fine. I am already supposed to have him for the holiday this just gives us a couple extra days. It would be greatly appreciated if will accommodate this.

Thanks,
Erich

ERICH'S COMPROMISE WITH DEFENDANT FOR SPRING AND SUMMER BREAK 2019:

On Thu, 02/28/19 at 6:07 PM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Upcoming Visits

Message:

Erich,

I am very happy with keeping Nathan for part of Spring Break and will arrange for a flight on the 18th.

I am also okay with him staying and extra week during the summer as part of makeup time- as long as we are able to come visit - we need to agree and arrange that soon so I am able to make plans, please. Will he be enrolled in sports? Can we help arrange things early so he can play baseball, soccer, or even continue with his Tae Kwon Do?

March is your month to come here and had no plans to fly Nathan anywhere.

Raina

On Fri, 02/15/19 at 3:45 PM, Erich Martin wrote:

To: Raina Martin

Subject: Upcoming Visits

Message:

Raina,

Due to unforeseen circumstances, i will not be able to have Nathan for Spring Break 2019. I have a school that I am attending during April, and will not be able to have him. Which, I doubt you'll mind so that way you can have him for this year's break. I am proposing the following for Nathan's visits please:

RA000933

1. I have already purchased a flight for Nate to come to Texas on 21-24MAR19. If you would, could you please pay for his flight out here (\$120). I will provide the receipt so that way you know I'm not making you over pay. This can be part of the make up time from 2018.

2. I have already purchased a return flight for him on 21APR19. Would you please fly him out on night of 18APR19 or morning of 19APR19, please. That is the last few days of his Spring Break and is when I am Finished with my school.

3. Please let me have him an extra week of summer this year- this way I can completely make up the time from 2018 and the days I miss from his Spring Break 2019. After that, we can call it good and put him on his normal schedule per the decree. Plus, I will let you come out one of the weekend's during summer so you can visit him if that is something you need so i can have time with him that he and I both need.

This will allow him to get to have some fun with his brothers and sisters, Jules and me. Plus, I'm already working with Mrs Oney to ensure I stay on top of his homework. Nate and me deserve this time, so please do as you say and help encourage that to actually happen here.

Thanks,
Erich

ERICH INFORMS DEFENDANT ABOUT SUMMER 2018 MAKE UP NEGOTIATIONS

- From:Erich Martin
- To:
- Raina Martin (First View: 07/04/2018 11:41 AM)
- Sent:07/04/2018 11:40 AM
- Subject:RE: Nate Return to Vegas

Message:

He will be flying on SWA Flt# 407 on 12JUL18, and gets in at 9:50pm there in Vegas. When will be a good time to make up the time I've had to sacrifice due to my work preventing me the remainder of the time with Nate?

Erich

On Wed, 07/04/18 at 10:53 AM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Nate Return to Vegas

Message:

Erich,

Yes, send him on the 12th. We work and my mom is in Pittsburgh until the following week but we will figure it out. Let me know the time ASAP so we can make arrangements.

Raina

On Tue, 07/03/18 at 7:02 PM, Erich Martin wrote:

To: Raina Martin

RA000934

Subject: Nate Return to Vegas

Message:

Raina,

Would you be willing to have Nate fly home on 12JUL18? Based on some training and flight constraints, this would be the easiest for getting him back to you all. The flight for Nate would arrive at 9:50pm.

I would greatly appreciate it. Let me know tonight if you would please. He will be calling shortly too.

Erich



EXHIBIT B

DEFENDANT IS IN VIOLATION OF JOINT-CUSTODY

DEFENDANT IS DISHONEST AND MAKES UNILATERAL DECISION ON WALLIN ELEMENTARY

**- ON 23JUN19, DEFENDANT CLAIMED IN JUNE AND JULY 2019 THAT
SHE HADN'T "DECIDED ON NATHAN'S SCHOOL YET"**

On Sun, 06/23/19 at 2:35 PM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Nathan's School Enrollment

Message:

Erich,

Please stop sending and writing inflammatory messages.

We were discussing the option of moving back to Henderson. It was a discussion and it may or may not be happening. We are not 100% yet because of Tony's work and Forbus lost their funding for TAGS.

When we finally decide if we will be moving, I will tell you. There is no reason to tell you something that may not happen.

Raina

On Sun, 06/23/19 at 2:02 PM, Erich Martin wrote:

To: Raina Martin

Subject: Nathan's School Enrollment

Message:

Raina,

Where is Nathan going to school next year? I was having a conversation yesterday with Nathan about his work in school and making progress with his writing and math, and I asked him if he was excited about 4th Grade in Forbuss. His response:

"My mom doesn't want me to tell you this, but I may be going to Wallin again next year?"

I'm tired of fighting with you, but the amount of secrecy with things regarding Nathan from you has been out of hand for years. He struggles with honesty as it is and it stems from the style of parenting that goes on down there with you. You can make accusations all you please against me, but I have the proof of what you are doing to damage his relationship with me and what you do in general. It's time you realize that you're hurting Nathan even more than anything.

Is Wallin even going to allow him to come back to their school?! I am well aware of why he had to leave there originally- as that was made clear during your attempt to hide it during the 504 meeting.

Seriously, just be honest about whatever it is that you are planning on having him do next year. Instead of trying to make excuses and point blame, why not work with me to make HIS FUTURE brighter! It's not about you, it's about him.

Erich

RA000937

ON 25JUL19, DEFENDANT FINALLY TELLS ERICH WHICH SCHOOL NATHAN WILL ATTEND:

- From: Raina Martin
- To:
- Erich Martin (First View: 07/25/2019 10:22 PM)
- Sent: 07/25/2019 10:21 PM
- Subject: RE: Nathan's School

Message:

Erich,

As of the 2019/2020 school year, Monday August 12th, 2019- Nathan will be attending his previous school Wallin Elementary School located at 2333 Canyon Retreat Drive, Henderson, NV 89044 (702) 799-5776. His school hours are 0730 to 1401 daily. I will advise the school that you are his biological father, as we do every year. As always I will provide you with all school updates, school functions, and other information as I get them or we become aware. Wallin Elementary is a well-respected school in the community, a national blue ribbon school, a 5 out of 5 star's school and on the verge of becoming a top 100 national school. This change in his school location is a result, solely, on our moving back to our home at 2812 Josephine Dr. Henderson, NV 89044.

Thanks,

Raina

On Thu, 07/25/19 at 8:37 PM, Erich Martin wrote:

To: Raina Martin

Subject: Nathan's School

Message:

Raina,

Which school is Nathan attending this year? I am sure you know by now which school it is, and I need to know. This way I know his schedule for visitation and tracking his progress in school.

Erich

ON 16SEP19, ERICH LEARNS DEFENDANT HAS BEEN CONCEALING THE TRUTH ABOUT NATHAN'S SCHOOL SINCE MAY 2019:

Rene Keathley [Wallin ES] <keathrl@nv.ccsd.net>

16 Sep 2019, 10:34
to me

Good morning Mr. Martin,

My apologies for my delay in responding. I was out of the office Friday and this is the first email I received from you. I have updated all of your information in Infinite Campus. Please remember to log into Infinite Campus to check grades, attendance, etc. for Nathan. **Nathan's online registration was submitted on 5/13/2019. Have a great day!**

RA000938

Rene' Keathley
Elementary School Clerk
Wallin Elementary School
2333 Canyon Retreat Drive
Henderson, NV 89044
WAN: 0483-4006
702-799-5776 Fax: 702-799-5752
Keathrl@nv.ccsd.net

ON 13NOV19 DEFENDANT MAKES UNILATERAL DECISIONS ON MEDICAL:

On Sun, 11/24/19 at 4:31 PM, Erich Martin wrote:

To: Raina Martin

Subject: Medical Appointments

Message:

What health issues does Nathan have that caused you to take him to the dermatologist and ENT? Also, why did you not discuss these concerns with me prior to scheduling these appointments? I would like to be involved in any and all of his health care needs. It is not enough for me be informed after the fact that he needed to see a specialist.

Please send me information on all of Nathan's providers. I would like the Name, address, phone numbers and any information/diagnosis they find relating to his health. In addition to this, please send me copies of all EOBs received from the insurance company. I also need all information related to Nathan's insurance provided by Tony.

Erich

DEFENDANT'S NON-COMPLIANCE AND UNILATERAL DECISION-MAKING ISSUES IN 2018

- From:Erich Martin
- To:
- Raina Martin (First View: 01/24/2018 2:08 PM)
- Sent:01/24/2018 1:40 PM
- Subject:RE: Satisfaction of Judgement & Visitation

Message:

Raina,

It never ceases to amaze me your scandalous measures you live by to claim you're "looking out for Nathan."

1. I spoke with Mr Toth at Forbuss and he NEVER "recommended" Nathan see Dr Harder for therapy. In fact he not only did NOT know you were taking him to Dr Harder, but he said he CANNOT recommend a child to see a therapist!

2. I called Dr Harder's office, and you not only HAVE TO TALK to me and have permission as

RA000939

per their practice, but THIS IS IN THE DECREE!! At every point that you have made claims that I "don't follow the decree" it is so you can make accusations to deflect from the fact that it is YOU who is disobeying the decree!!

So they are canceling the appointment because you haven't been honest and you don't communicate properly. Duly, I am in training for the day he is supposed to be seen. Oh by the way, you did not tell me his appointment date- I asked specifically.

3. I called the NEW OPTOMETRIST that you have chosen to use and they didn't even know he had a prior prescription!! Not only that, they don't know what it was before since you made it seem like it was for a new issue for Nathan!! I WILL NOT PAY FOR THESE ITEMS!!

Unless it is an emergency all appointments have to be cleared with me prior to making them. If you want to get Nate new glasses you have to discuss it with me first or I am not obligated to pay for them. I would have liked the opportunity to discuss the need with the Dr prior to a purchase and have a say in the style and type of glasses purchased. Next time please discuss these things with me beforehand.

Seriously, what is wrong with you?!! And you want to point fingers about me not giving a zip code?? **YOU DIDNT GIVE ME NATHAN's SCHOOL INFO OR YOUR NEW HOUSE UNTIL DAYS BEFORE SCHOOL STARTED!! I asked SO MANY TIMES even beginning in April 2017, when I knew you had the Principal lie in the "504 meeting" for Nathan at Wallin Elementary.**

Nathan lies on a whim even during FaceTime! He claimed he no longer could talk the other night because he was "losing reception" when it was him covering the screen. He constantly tells me the percentage of battery is low because he is coached by you to do that and not talk to me.

This nonsense is so repetitive it's OUT OF CONTROL!! You are going to destroy his character, and ruin his confidence. We (Julie and me) ACTUALLY provide love, structure and discipline. I don't know how you think you are "looking out for him" but this is insane!!

And I will let you know when I can see Nate. Like I said, I have provided the PROPER 30 day notice and beyond. If you play games like you've done for the last 3 years of our lives and beyond to be honest, it will likely not bode well for you in court if you push it further. I am ashamed of what you are doing and you should be too!! Stop this nonsense!!

Erich

DEFENDANT'S HISTORY OF CONCEALING SCHOOL AND UNILATERAL DECISIONS ON MEDICAL IN 2017:

On Thu, 07/27/17 at 9:17 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Compliance with the decree and school

Message:

Have you ever consulted me" before" taking him to the Dr. Or day care? Not once ever.

Have you involved me in the decision making? Never! You chose his Dr., his after school care, and his school which yes if moving effects his school you do have to consult me. You voluntarily moved!

When I move it has no effect on his school whatsoever. So no I don't and I am in the military I have no choice and you and the Judge know that and there are laws protecting me on that. Look them up they are specific for active duty parents.

On Thu, 07/27/17 at 9:09 PM, Raina Martin wrote:

RA000940

To: Erich Martin
Subject: RE: Compliance with the decree and school
Message:
Erich,

I do not have to discuss with you if I move- the school is zoned and that is not my choice. Unless you would like to put him in a private school where you can pay half of it - then we can talk. You are moving to Texas did you consult me? I have supplied you on every other piece of information - his afterschool programs his doctors all of it. Again- Constant back-and-forth.

On Thu, 07/27/17 at 9:03 PM, Erich Martin wrote:

To: Raina Martin
Subject: Compliance with the decree and school
Message:
Raina,
Since we are on the subject **the decree clearly states that you have to discuss and we both have to agree on school changes, health care providers and daycare providers. You have never consulted me on any of these matters before taking him to the Dr.** Or most importantly moving across town and changing his school. You are the one not in compliance. See attachment
Thanks,
Erich

- From: Raina Martin
- To:
- Erich Martin (First View: 05/21/2017 9:03 PM)
- Sent: 05/21/2017 9:01 PM
- Subject: RE: Moving/Nathan's school

Message:
Erich,

You don't have a say in school- I don't. It's called "zoning" look it up.

Raina
On Sun, 05/21/17 at 8:58 PM, Erich Martin wrote:
To: Raina Martin
Subject: RE: Moving/Nathan's school
Message:
Raina,

I don't care where you buy the house. **But, you do have to give me a say in his school.** Are you and Tony getting a divorce?

Erich
On Sun, 05/21/17 at 8:57 PM, Raina Martin wrote:
To: Erich Martin
Subject: RE: Moving/Nathan's school
Message:
Erich,

I will let you when the decision is made. You do not dictate where I buy a house in the same town.

Raina

On Sun, 05/21/17 at 8:50 PM, Erich Martin wrote:

To: Raina Martin

Subject: Moving/Nathan's school

Message:

Raina,

Where are you moving? Where is Nathan going to school? I need to know these things so that way I can plan for Nathan's upcoming visitations. **To be compliant with the decree, you need to inform me of these things. Further, WE have to agree on these things. You get in the habit, just like last summer, of making decisions on these matters when it has to be agreed upon by both of us for school and sports.** Please let me know.

Erich

HISTORICALLY, DEFENDANT MAKES UNILATERAL DECISIONS IN 2016:

On Mon, 08/08/16 at 8:17 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Passport, QDRO, & Insurance

Message:

Raina,

You paid the \$100 for the QDRO filing fee before you ever sent me papers to sign. You did not pay the extra \$100 because I refused to sign the papers. You indicated that when you sent me the paperwork for the first time. Your dishonesty in all things baffles me.

As far as glasses in the future goes. Nathan at age 5 or 6 or whatever age does not need top of the line designer glasses. Had you chosen a cheaper pair there may not have been any fee at all. Please send me all of his other insurance information including all policy coverages, policy holder info and DOB, whether or not it is to be billed as primary or secondary etc. This is so that I may stay informed and may be able to use it here in the case that it becomes necessary to do so. Also the receipt you sent is not complete. Please send me a copy of the EOB from both insurance companies so that I may also track this for my records. The provider you choose effects the amount I have to pay for his medical expenses I would like to track this also.

I am sorry if the other life insurance company never contacted me and that they do not keep any records in order to track application information. If they do please have them send proof that I denied their request for anything at all. Sounds like it is something you made up in court so that you could try to make me look bad. The first time I have ever received anything pertaining to an insurance policy was after I returned back from KY just a little more than a week ago. I have since signed it and sent that back to you. I will send the originals as well as passport information on Monday. As far signing the QDRO goes, I have stated several times that I will not sign it because there are some things that I wish to discuss pertaining to that in mediation. As soon as mediation is complete I will sign it as long as we have an agreement on the terms. I will not pay for his passport or sports because those are the kind of things I pay child support for.

Nathan said that he is signed up to play tackle football. I hope that it is not the case, because I will absolutely not support that at this time. He is not even close to ready for that. If he is incorrect and it is only flag football, please send me all information pertaining to his team, league, coaches name and contact information, practice and game schedule. I plan to contact the coach and have my email address added to the team distro list.

RA000942

Tomorrow, 09AUG16, Nathan will be staying at the house with the kids with our babysitter, Ashley Soulier. She is 16yrs old and has babysat for us many times. Also, either tomorrow night, or Wednesday morning, we will be heading to UT to stay with Julie's brother in Bluffdale. You have the address already, and we will return Sunday evening to CO. -Erich

EXHIBIT C
DEFENDANT IS IN VIOLATION OF VISITATION

ERICH'S ORIGINAL REQUEST FOR OCTOBER 2019 VISIT

- From:Erich Martin
 - To:
 - Raina Martin (First View: 09/09/2019 7:04 PM)
 - Sent:09/09/2019 6:48 PM
 - Subject:OCT 2019 and Thanksgiving 2019 Visit
-

Message:

Raina,

I would like to exercise my visitation for the following dates:

1. He has OCT 25-27off. If you would please, fly him to Denver, CO on 24OCT19, after school. I will have him back by 5:25pm on 27OCT19.

2. Nate is off from 23NOV19-01DEC19. If you would, please fly him to Austin or San Antonio, TX on 24NOV19. I will have him back by 8:10am on 30NOV19.

Since I won't likely get to visit in September, and I get Thanksgiving this year, that's why it would be this way. Duly, this should be far enough out to get decent prices on flights for Nate. Please, let me know his itinerary as soon as possible.

Thanks,
Erich

DEFENDANT IGNORES REQUEST FOR 2 WEEKS

- From:Erich Martin
 - To:
 - Raina Martin (First View: 09/24/2019 9:32 PM)
 - Sent:09/24/2019 8:07 PM
 - Subject:Two Weeks No Reply: OCT/Thanksgiving Visitation
-

Message:

Raina,

I sent the following message on 09SEP19, and it is now 2 weeks and I haven't received a reply:

Raina,

I would like to exercise my visitation for the following dates:

1. He has OCT 25-27off. If you would please, fly him to Denver, CO on 24OCT19, after school. I will have him back by 27OCT19.

2. Nate is off from 23NOV19-01DEC19. If you would, please fly him to Austin or San Antonio, TX on

24NOV19. I will have him back by 8:10am on 30NOV19.

Since I won't likely get to visit in September, and I get Thanksgiving this year, that's why it would be this way. Duly, this should be far enough out to get decent prices on flights for Nate. Please, let me know his itinerary as soon as you purchase them.

Would you please let me know what you are planning to do for Nate for his visitation.

Thanks,
Erich

DEFENDANT DENIES NATHAN VISITION FOR OCTOBER 2019

- From:Erich Martin
- To:
- Raina Martin (First View: 10/25/2019 1:07 AM)
- Sent:10/24/2019 8:15 PM
- Subject:Denied Oct 2019 Visitation

Message:

Raina,

I'm just letting you know that I am canceling Nathan's flight for Sunday since you have chosen to deny Nathan coming to visit our family. Arguing your reasons is unnecessary here, as it is contrary to claiming "a supportive relationship" for Nathan and me. If the shoe was on the other foot, I would not do that to you and you know it. Please inform me of his flight to Texas for Thanksgiving as I've requested this no less than 4 separate occasions now.

Erich

- From:Raina Martin
- To:
- Erich Martin (First View: 10/25/2019 7:14 AM)
- Sent:10/25/2019 1:10 AM
- Subject:Re: Denied Oct 2019 Visitation

Message:

Erich,

Your visitation was never denied- you chose not to exercise your visitation, again.

We will get you his Thanksgiving flight itinerary to you as soon as it is booked.

Thanks,
Raina

On Thu, 10/24/19 at 8:15 PM, Erich Martin wrote:

To: Raina Martin

Subject: Denied Oct 2019 Visitation

Message:

RA000946

Raina,

I'm just letting you know that I am canceling Nathan's flight for Sunday since you have chosen to deny Nathan coming to visit our family. Arguing your reasons is unnecessary here, as it is contrary to claiming "a supportive relationship" for Nathan and me. If the shoe was on the other foot, I would not do that to you and you know it. Please inform me of his flight to Texas for Thanksgiving as I've requested this no less than 4 separate occasions now.

Erich

HISTORY OF DEFENDANT FAILING TO COMPLY ON VISITATION:

On Wed, 05/03/17 at 1:11 AM, Erich Martin wrote:

To: Raina Martin

Subject: Nathan's visitation (non compliance)

Message:

Raina,

You are clearly having a difficult time interpreting the Decree. I am not surprised as you tend to try to manipulate it to suit yourself. Let me explain how it is written.

1. See attached photo. I am entitled to visitation every month while Nathan is in school as regular visitation. I also have a holiday and vacation plan which consists of holiday time including spring break, thanksgiving, Christmas/ winter break, and summer. The part of the decree you are confused about is where it states these holiday and vacation time happens to be on any "given month" (meaning the monthly 3 day breaks) it will be considered my "regular visitation for that month" this is saying that when there is a "holiday" in the same month as a 3 day break from school. I have to consider the holiday as my visitation. I do not get "BOTH" visits in "THAT MONTH"

It never states that the holiday, vacation, or summer schedules are included in the travel alternating monthly. These are a separate visitation schedule. My monthly visitation consists of any and all 3 day weekends and staff breaks from school. Not vacation and long holidays.

2. Judge Burton clarifies this further in the modification(see attached photo) where she states that I am entitled to visitation alternating monthly...to include all of the holidays/ breaks from school that she listed....read pg 2 of the modification order.

3. The 2nd paragraph of the modification order lists out my holiday time and the 3rd lists out summer. These are separate from my regular monthly visitation where we alternate between Las Vegas and wherever I choose. (see attached photo)

As you can see, it is quite clear in the decree that regular alternating monthly visits are all 3 day holidays and staff days etc....holidays including spring break, winter break, thanksgiving and summer are separate. His last visit here was spring break. My last regular monthly visit was in March and I was in Las Vegas. His next scheduled monthly visit is memorial day and he is to come to Colorado. His next visit after that I may choose to go to Las Vegas in June. And then he will come to Colorado for summer (see attached photo) since he will be going back to traditional schedule in order to get my full time for the summer nathan's return visit to you in the summer will need to be 1 week instead of 2 weeks in order to get my full time. Nathan will fly to Colorado June 30 pm or July 1 in the am to have it considered a 4 day weekend and I can add this to my first week of summer. Nathan will return to you July 15th. He will then fly back to Colorado July 23 until Aug 13th instead of Aug 19th in order to give me the final 3 weeks of summer.

As you can see, this is correct. I am tired of wasting time and money in court. If you do not send Nathan I will be forced to ask Judge Burton to hold you in contempt. I feel that since this will be the second time for the same offense she will not be lenient.

As far as Nathan "wanting" to visit. Do not give him a choice! Try acting excited for him instead of

RA000947

making it a chore or difficult for him. Also, please stop telling him that he has a choice to not come at all once he is 12 years old. I am documenting these things so that in the event you try fight to have him choose to not come when he is older I can show manipulation on your end. You will not win that case as long as Nathan has been manipulated by his parent. Why would you want to have him choose to not see his father? That is beyond horrible Raina. -Erich

EXHIBIT D

DEFENDANT'S MISLEADING EVIDENCE

DEFENDANT'S OBSTRUCTION OF JUSTICE

- From:Erich Martin
 - To:
 - Raina Martin (First View: 10/16/2017 6:02 PM)
 - Sent:10/16/2017 6:02 PM
 - Subject:Contempt
-

Message:

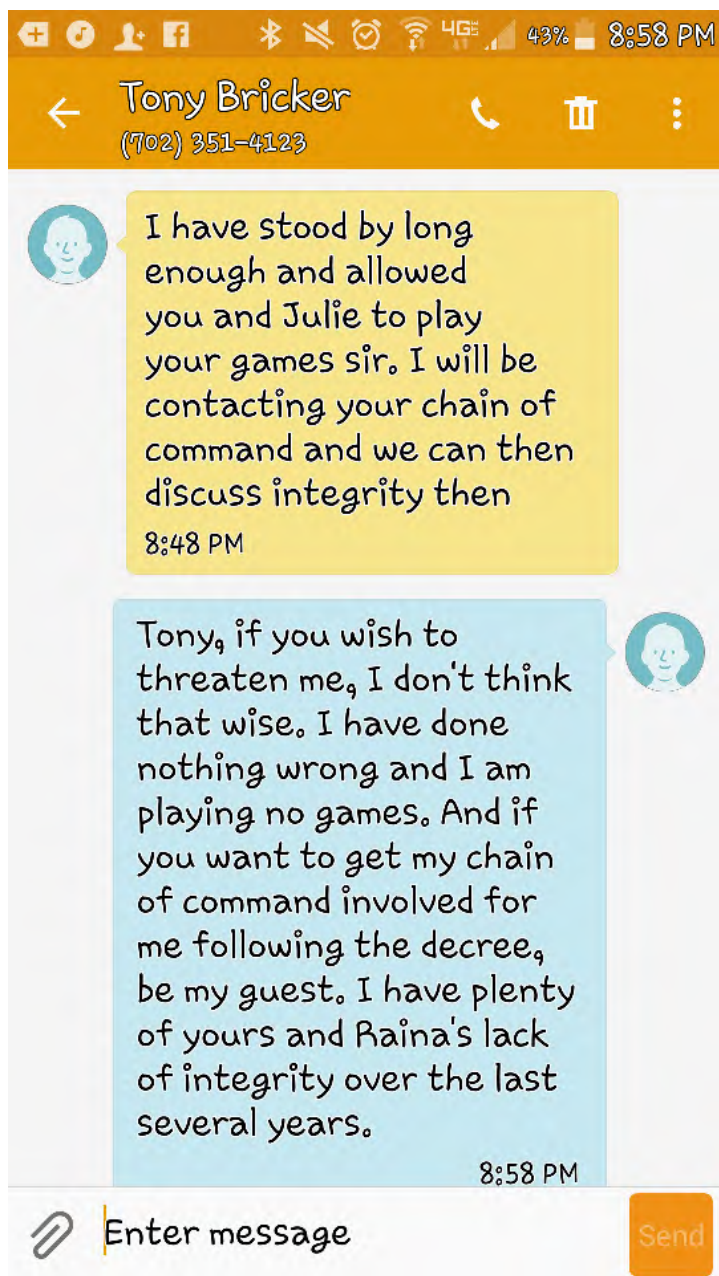
Raina,

I am just giving you forewarning that I am filing a motion of contempt against your dental office. I have already contacted them earlier last month and they claimed they were going to do the garnishment. This however, is apparently not the case since they've not responded to the Las Vegas Constable.

That being said, they should be prepared to pay \$1000.00 for each month since they were served for not responding to the Constable. This amount is on top of the garnishment. I am not contacting them further and this is not a threat. I am providing you what the NV statute is upon this matter.

Erich

ON 28JUL17, DEFENDANT'S DOMESTIC PARTNER SENDS ERICH THREATENING TEXT:



THIS TEXT WAS BASED ON THE FACT THAT DEFENDANT REFUSED TO COMPLY WITH A WRIT OF GARNISHMENT BASED ON JUDGE BURTON'S DECISION VS. DEFENDANT

ON 23NOV17, DEFENDANT CALLS POLICE ON ERICH AND CALLS ERICH'S EMPLOYER

On Thu, 11/23/17 at 8:13 PM, Erich Martin wrote:

To: Raina Martin

Subject: Proof of Raina's Threats

Message:

Raina,

I am keeping a record of this email to show your boss and Tony's chain of command. I will also provide the evidence of yours and Tony's work to obstruct justice on a writ of garnishment.

Further, according to the decree you aren't entitled to talk to him until 8pm (PST). I haven't denied you anything.

Erich

On Thu, 11/23/17 at 8:02 PM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Calling the police

Message:

Erich,

The police have been called and a message has been left with your chain

On Wed, 11/29/17 at 9:39 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: More of Julie's Texts

Message:

Raina,

I don't control Julie. She speaks the truth. You can't attack her and her family and expect her to not react. I'm sorry if you don't like it. You have texted her as well and I have received multiple threatening texts from Tony. Most recent, Tony yelling and belittling me in front of Nate. You need to stop with the lies and nastiness. Leave us alone. Stop programming Nate and let me just be his dad and stay out of my relationship with him. You are the problem here Raina, and I have had enough. Your copies of Julie's messages don't hold water they aren't exact, you have changed some and you can easily manipulate messages in text or email by deleting things you send or say and adding things. So your copies of the "texts" mean nothing.

Erich

EXHIBIT E

DEFENDANT'S HARASSMENT OF ERICH

DEFENDANT HARASSES ERICH'S EMPLOYER APRIL 2018

On Mon, 04/16/18 at 9:44 PM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Second Official Request

Message:

Raina, here is my official response.

When and where Nathan and I will be:

You can ask or demand all you want but I am not obligated to answer these questions by 18 April. I have given you more than 30 days notice that I want Nathan for my 8 week summer break. According to Nathan's school schedule he gets out of school on May 24th. I expect to get Nathan no later than May 25th as I am also entitled to the Memorial Day Holiday. Nathan will return to you 8 weeks later on July 20th. I will let you know as soon as I know which home I will be at on May 25th. There is nothing in the decree that states I need to let you know where I will be by 18 April. How many times did you wait until the last second to let me know when Nate was coming or even if he was coming? I am letting you know now that Nathan and I will be spending time in both Texas and Colorado. It is my time and my right to take him anywhere I want at any time as long as I let you know where he is. There is no restriction as to where I can take him unless it is out of the country and no time requirement to giving you this information.

Sports:

If I choose to enroll Nathan in a sport I will discuss it with you prior to doing so. As it states in the decree. It will not be by 18 April but closer to the time of enrollment. If we agree on said sport I will sign him up and pay for it. Unlike you who signs him up first then informs me after he has started.

My XO (EXECUTIVE OFFICER):

I am in the process of providing my XO with a copy of our decree with the obligations I have to you and to Nathan highlighted for him. I will make sure my actions are in line with exactly what the decree states. Child support paid. Agreed upon medical bills pd at 50% as long as you use an in network provider and incur covered expenses. Anything not covered has to be consulted with me first. Visits at least 30 days notice, 15 days for changes and, from now on all calls will be by the decree at 8pm pst. I will inform you of where Nathan is and all travel plans as i know them. Btw you have not informed me of your new employers information. Shall I contact him/her and let them know when you are not in compliance with the decree. **Seems silly to harass my XO when you are the one not in compliance. I remember you threatening to sue me for defamation when you fraudulently destroyed a court order to garnish your wages. I can do the same thing Raina so be careful what you try to lie to my XO about. Your husband is a cop he should be able to educate you on the law.**

Therapy:

According to the decree you have to discuss with me the need for therapy. I have to agree to the reasons for therapy and approve of the Therapist prior to any appointments being made. It is against our decree for you to have made an appointment without discussing Nathan's needs with me beforehand. You broke the law and the therapy office apologized to me because they never would have scheduled the appointment had you informed them of our situation and the law (decree). So Raina why do you feel Nathan needs emergency therapy? I am not sure a 7yr old need a therapist at all. When you can articulate your concerns to me and, if I agree with your concerns then, Nathan can have therapy. Not before. I will talk to the therapist to make sure only the concerns you provide me are discussed and any deviations will be discussed with me prior. I want to be involved in the therapy sessions. Would you mind if he saw a therapist here in Texas or Colorado with me?

Summary:

Follow the decree please. Do not ask me for more information than the decree requires and make sure that you keep yourself in line with what you signed when we got divorced. One more thing, don't ever send me an email asking if I am okay. First, you don't care. Second, it is a gross manipulation on your

RA000953

part to try to make me look bad for not calling. If I am able I will call if I'm not I won't. When and if I call is none of your business. If something has happened to me you will be contacted as we see fit. I would hope you follow the decree and at those times that I am unable to call or can't visit Las Vegas you foster a warm loving relationship between me and Nathan. Anything else such as making him feel I don't want to talk to him or visit is in violation of the decree. If he is sad I will talk to him about it. I can attach copies of the decree for you to review if needed.

Thanks,

Erich

EXHIBIT F

DEFENDANT DOESN'T ANSWER OR MONITORS CALLS

On Mon, 10/01/18 at 8:38 PM, Erich Martin wrote:

To: Raina Martin

Subject: 01OCT 18 call and various missed calls

Message:

I have called three times trying to get a hold of Nathan. Please have him call back. I am not trying to be volatile here, but over the last couple of weeks several times you either missed calls and didn't FaceTime back or would call back at extremely late. I don't call and harass every night, so please help Nate and me out please.

And before you try to make an issue of me not calling this weekend, I was working.

Erich

On Wed, 05/31/17 at 10:28 PM, Erich Martin wrote:

To: Raina Martin

Subject: Monitoring FaceTime 31MAY17

Message:

Raina,

I do not appreciate you monitoring my FaceTime with Nathan. You've been doing so every time for the last 4 weeks, and tonight was extremely difficult.

First off, never is it ok for you to feed Nathan questions while he and I are having a conversation. That 10 min is my time not yours to make me look bad telling him I was in the wrong for "not doing" his project? Raina, it is a holiday weekend and I only had Nate for 3 days, 2 of them we were camping! When would I do a project? Last time I emailed his teacher about sending homework she told me his time should be enjoyed with his dad and not spent doing homework. Maybe you should head this advice as well. From 15 April until July 1 I had 3 days to spend with Nate. I chose to enjoy it.

Again, if you want to abide by the decree then you need to follow it all. Please stop doing these things as it only hurts him by making him uncomfortable. You have him most of the time take the responsibility of custodial parent and do his homework with him. If you do not want this responsibility then I will be glad to take physical custody of him.

Erich

RA000956

EXHIBIT G

ATTORNEY FEES

HISTORY OF DEFENDANT UNNECESSARILY DRAGGING LITIGATION OUT TO INCREASE ATTORNEY COSTS

On Sat, 04/08/17 at 11:58 AM, Erich Martin wrote:

To: Raina Martin

Subject: RE: Important please respond

Message:

Raina,

You lost this case in court on 12 Jan 2017. This is not a surprise. You have known for 4 months that you are going to have to repay the alimony and that you will owe attorneys fees. You and your attorney have stalled and wasted everyone's time and frankly charged alot of undue fees and expenses. This should have been settled months ago. (Could have been much easier and less expensive had you agreed in court back in October.) All of the information is available online for you to view through the Clark County District court. This is yet again another stall tactic on your part and I will not tolerate it any longer. When a judge signs an order it is the law.

Since this money owed is several months past due, a judgement is now signed and ordered by the Judge, interest is accruing, I expect a money transfer for the first payment by Monday or I will go directly to using any and all other legal means of recieving payment as allowed for by Judge Burton. I know that wont be ideal for you and I am willing to work with you even though I did not get the same courtesy from you pertaining to child support. As I stated earlier I will negotiate the payment arrangements with you but I will not allow you to stall any further on this.

Thanks,

Erich

On Sat, 04/08/17 at 1:26 AM, Raina Martin wrote:

To: Erich Martin

Subject: RE: Important please respond

Message:

Erich,

I haven't heard any of this from my attorney and your request is unrealistic as tomorrow is Saturday and will have no communications with my attorney until Monday. I am requesting that you give me until Tuesday, after I've spoken to my attorney and am able to process this info.

Raina

On Fri, 04/07/17 at 7:23 PM, Erich Martin wrote:

To: Raina Martin

Subject: Important please respond

Message:

Raina,

We now have a court order stating that you owe me \$6,000. A memorandum for awarded attorney fees totaling \$7842.48 was entered into the court today. That is a total of \$13842.48. Legally I can charge you 5.75 % interest and you will be required to pay any fees incurred in having to collect this amount by other legal means. I am asking you to work with me on a payment arrangements. I am requesting \$1000 a month until the \$6000 plus interest of over paid alimony it is pd off. The same amount I paid you monthly that you dishonestly took from me. For the attorney fees I am requesting that you pay me an additional \$1000 a month. I am willing to negotiate this with you. If you ignore this I will take any and all legal action o that I can to be paid back as quickly as possible. According to Nevada state law interest begins accruing from the day the judgement was signed. April 6, 2017. That is a total of \$2.13 a day. If you are willing to make larger payments to have this paid off sooner I will not charge you interest. Please respond in 24 hrs or I will assume you are not willing to work with me.

Thanks,

Erich

RA000958