

IN THE SUPREME COURT OF THE STATE OF NEVADA

DIAMOND HALL,

Appellant,

v.

JUSTIN MARTIN,

Respondent.

Electronically Filed
Apr 08 2022 05:42 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court No.: 83979

CHILD CUSTODY FAST TRACK STATEMENT

1. Name of Party filing this fast statement:

Diamond Hall

**2. Name, law firm, address, and telephone number of attorney submitting
this fast track statement:**

Amy A. Porray, Esq.
Nevada Bar Number 9596
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Las Vegas, NV 89146
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**3. Judicial district, county, and district court docket number of lower court
proceedings:**

Eighth Judicial District Court
In and for the County of Clark
District Court No.: D-19-600476-C

4. Name of judge issuing judgment or order appealed from:

Judge Sunny Bailey

5. Length of trial or evidentiary hearing.

One day

6. Written order or judgment appealed from:

Decision and Order (D&O)

7. Date that written notice of the appealed written judgment or order's entry was served:

D&O: September 15, 2021

8. If the time for filing the notice of appeal was tolled by the timely filing of a motion listed in NRAP 4(a)(4),

(a) specify the type of motion, and the date and method of service of the motion, and date of filing:

NRCP 59 motion, E-filed and E-served on September 29, 2021.

(b) date of entry of written order resolving tolling motion:

November 18, 2021

9. Date notice of appeal was filed:

December 14, 2021

10. Specify statute or rule governing the time limit for filing the notice of appeal, e.g., NRAP 4(a), NRS 155.190, or other:

NRAP 4(a)

11. Specify the statute, rule or other authority, which grants this court jurisdiction to review the judgment or order appealed from:

NRAP 3A(b)(1)

12. Pending and prior proceedings in this court. List the case name and docket number of all appeals or original proceedings presently or previously pending before this court which involve the same or some of the same parties to this appeal:

N/A

13. Proceedings raising same issues. If you are aware of any other appeal or original proceeding presently pending before this court, which raise the same legal issue(s) you intend to raise in this appeal, list the case name(s) and docket number(s) of those proceedings:

Bradley John Bellisario v. Emily Bellisario, #84128

14. Procedural history. Briefly describe the procedural history of the case:

Appellant, Diamond Hall, filed a Complaint for Custody and a Motion for Temporary Custody Orders, etc., on December 4, 2019. 1AA1-9, 12-21. Respondent, Justin Martin, filed an Answer and Counterclaim on December 16, 2019. 1AA41-45. Diamond filed an Amended Motion for Orders for Temporary Custody Orders, et al. on December 27, 2019. 1AA48-58. Justin opposed Diamond's motions. 1AA61-186. Justin filed a Supplement Regarding Domestic Violence on

January 3, 2020. 1AA187-97. The motion was heard on January 8, 2020. 1AA203-2AA320. The parties were ordered to mediate on January 8, 2020. 2AA0321. The court entered a minute order on March 20, 2020, which set a custody trial. 2AA343-45.

Defendant filed an ex-parte motion to continue trial on May 27, 2020. 2AA359-3AA528. The court entered a minute order on June 3, 2020. 3AA529-30. Defendant filed two supplemental exhibit appendixes on June 3 and June 4, 2020. 3AA531-73. Diamond objected on June 29, 2020. 3AA577-78.

Diamond filed an emergency motion to suspend custodial time on August 23, 2020. 3AA657-73, 4AA783-98. Justin opposed on August 24, 2020. 3AA674-700. The court had a hearing on September 1, 2020. 3AA718-4AA775. The court had a status check on April 22, 2021. 4AA830-848. Defendant filed a motion to continue trial on June 24, 2021. 4AA868-904. Plaintiff opposed on June 29, 2021. 4AA868-904. The court heard the motion on June 30, 2021. 4AA936-50.

The custody trial was August 16, 2021. 5AA1011-6AA1010. The court's written Trial Decision and Order was entered on September 15, 2021. 6AA1254-1325. Diamond filed a motion for reconsideration/new trial on September 29, 2021. 6AA1326-52. Justin opposed. 6AA1353-83. The court's decision was entered on November 18, 2021. 6AA1411-21. Diamond's Notice of Appeal was filed on December 14, 2021. 6AA1432-33.

15. Statement of facts. Briefly set forth the facts material to the issues on appeal:

Appellant, Diamond Hall, and Respondent, Justin Martin, never married, but are parents to one child, G.M. (born 06/28/19). 1AA The parties' relationship was contentious, and following alleged incidents of domestic violence, Diamond initiated a child custody action. *See* 1AA1-9. Diamond specifically wrote in her complaint that she had a pending domestic violence (DV) case, that could affect the current case. 1AA2. She moved the court for temporary custodial orders, asking the court to award the parties joint physical custody, and again letting the court know that there was a pending DV case. 1AA (motion at 7). She wrote that the allegations were false, and Justin made them to gain custody of G.M. *Id.* She later amended her motion, letting the district court know that she acted in self-defense. 1AA48-58.

Justin filed inflammatory motions in the district court. 1AA61-197. He argued extensively about the alleged domestic violence and representing that he had "volumes" of audio and video evidence of the incident. 1AA187-97, 212-13. Diamond had been arrested and formally charged with domestic violence for the same incident. 1AA208-09. The district court entered several interim orders, 2AA329-34, including that Justin was to provide his video evidence to the court on a flash drive. 2AA330. The district court also stated during the motion hearing that "anything you say obviously can be held against you, so you don't want to say much

right now until you get the criminal case. . . . [B]ecause it was a DV arrest, I do have to err on the side of the [sic] caution. . . . [W]e have to wait until we get a result in that [case].” *Id.* at 2AA20-10. The result was that Justin received temporary primary physical custody of G.M., subject to Diamond’s visitation from Fridays at 5:00 p.m. until Mondays at 7:00 a.m. 2AA330. The temporary timeshare began in January 2020. *Id.* at 329-34.¹

On March 20, 2020, the district court, by minute order without a hearing, found that Diamond’s criminal case was set for March 30, 2020. 2AA348. Diamond had followed all of the district court’s requirements from the January hearing. *Id.* at 348-49. Justin had not, including not providing the district court with his flash drive of audio/video of the alleged domestic violence, not giving photographs of the same, not giving proof that he deposited his weapons with law enforcement, and did not take the COPE seminar for separating parents. *Id.* Trial was set for July 6, 2020. *Id.*

Justin, rather than comply with the district court’s January order as discussed in the March order, next filed a motion to continue the custody trial because Diamond’s criminal trial had been continued because of COVID-19. *Id.* at 359-3AA528. Improperly, he filed this ex parte and *did not* serve this on Diamond.² *Id.*

¹ Immediately after the January hearing, the parties attempted reconciliation, even stipulating to dismiss the stay away and behavioral orders. 2AA327-8. That was ultimately unsuccessful. *See* 2AA348-49, 359.

He unnecessarily and irrelevantly included many prejudicial exhibits with his motion, including photographs, the police reports from the criminal case, still shots from surveillance video at his home, and pictures of his weapons. *Id.* Justin had pictures of video, but nothing showing that he uploaded the flash drive as ordered. *Id.*

Justin's sole basis for requesting a continuance of the custody case was that he wanted the criminal case to proceed first because he wanted to admit domestic violence evidence at the custody trial as relevant under the best interest analysis. 3AA359-71. The custody trial was rescheduled to September 14, 2020. 4AA529-30, 574-77.

In the interim in August 2020, Diamond noticed bruising and injuries on G.M. following custodial time with Justin and moved, on an emergency basis, to suspend Justin's custodial time. 3AA657-73. Justin again represented to the district court that he had many hours of video of his custodial time with G.M. that would show that he did not abuse G.M. *Id.* at 674-700. At the hearing on Diamond's motion, the parties appeared with counsel, both having just retained counsel on their behalf. *Id.* at 724.

Diamond's counsel notified the court that Diamond's criminal attorney had sent a subpoena to Justin to obtain the entire video from the alleged domestic violence incident (the same video Justin had, thus far, failed to submit to the district

court). 3AA720. Justin had only provided a five or six second clip and was refusing to turn over the rest. *Id.* at 720-21.

The court inquired about the status of Diamond's criminal case, which was still pending. 3AA723. The court also asked Justin's counsel about the flash drive of the videos. *Id.* at 728. His counsel represented that Justin had complied, but the court ordered specifically that Justin's counsel was to upload the audio and videos into a drop box. *Id.* at 728. Diamond had not given the court enough evidence to alter the temporary orders, and Justin's temporary primary physical custody was restored. *Id.* at 730-31. The custody trial was again reset, this time because of COVID-19. *Id.* at 730. The court directed the parties to file a motion regarding resolution of the criminal case. *Id.* at 733. Trial was reset for May 20, 2021. 4AA768.

At the pretrial hearing on April 22, 2021, the court questioned the parties about Diamond's criminal case and its status. 4AA835-36. Upon learning that it had been reset for trial, the court said,

I think it's going to be a long time before that gets decided, which means we carry forward. So at this point, we're looking at this case needs to be resolved. It's been hanging out there. The only reason I couldn't keep it on the [trial date on May 20, 2021] is it conflicted with other calendars already.

4AA836. Later, the court again said, "this [case] has been going on since December of 2019, and I just don't see how it's possible where we can continue." *Id.* at 846. The court directed Diamond to talk with her criminal counsel about how to proceed

with testifying at the custody trial and whether to invoke her Fifth Amendment rights. *Id.* at 843, 845. The custody trial was set for July 30, 2021, or August 2, 2021. 4AA866.

Subsequently, when Diamond’s DV trial was reset from June 10, 2021, until October 28, 2021, the parties stipulated to continue (at Justin’s request to Diamond), the custody trial until after the DV case was adjudicated. The court rejected their stipulation and order, requiring Justin to file a motion to continue the trial. 4AA873-79. Diamond’s attorney opposed the motion—not the extension but asked the court for new interim orders and because Justin had included highly inflammatory references to a prior criminal history of *a different Diamond Hall*. 4AA905-22.

At the hearing on the motion, the court said, “”Counsel, this has been going on since 2019. I want this trial done.” 4AA938. The court stated that Diamond could invoke her right to remain silent, and Justin could testify to the “whole thing.” 4AA939. The court further said, “[T]he Supreme Court wants me to resolve child custody matters within six months, and divorce cases within a year.” 4AA941. “Like I said, she either invokes and you can go ahead and use the presumption, or we go from there.” 4AA943. The court reset the trial to August 13, 2021, with no further continuances. 4AA934-35.

At the custody trial, Diamond testified, waived her Fifth Amendment rights, and testified to self-defense. 5AA1044. While Diamond was cross-examined,

opposing counsel discussed videos of the incident, and referenced hours of video that had not been disclosed. *Id.* at 1082-87. Justin produced edited versions of the incident, both in the custody case and the DV case. *Id.* The few second snippets were admitted. 4AA1087; Defendant's Admitted Trial Exhibits.

Justin testified that his security system had video, but no audio. *Id.* at 1199. However, his phone had audio, and he had over 30 hours of audio recordings. *Id.* at 1199. He testified affirmatively that he never produced it, invoking his attorney-client privilege. *Id.* at 1200-1203. Although Diamond had specifically asked for the audio and video in her discovery requests, Justin did not produce the hours of audio and video. *Id.* 1203-05. The court ruled that was an issue that should have been brought before the discovery commissioner, to which Diamond argued that she was learning, for the first time and just then, that the audio and video existed beyond what was produced. *Id.*

The court found that Diamond committed domestic violence against Justin twice and did not overcome the rebuttable presumption. 6AA1292. The court relied on the video snippets to incorporate Justin's testimony regarding the domestic violence. 6AA1276. Justin was awarded primary physical custody, with Diamond receiving visitation from Friday at 6:00 p.m. until Sunday at 6:00 p.m. 6AA1313-14. In ruling on Diamond's motion to reconsider or for new trial, the district court denied Diamond's motion, but struck Lines 16-18, page 18 in its Decision and Order,

in accordance with that portion of Diamond's motion for reconsideration, etc. 5AA1386. However, despite Diamond's success on that issue, Justin would be awarded attorney's fees and costs as sanctions and for being the prevailing party.

Diamond now appeals.

16. Issues on appeal. State concisely the principal issue(s) in this appeal:

- A. Did the district court violate Diamond's constitutional rights by not continuing her trial until after resolution of her criminal cases?
- B. Did the district court err by not finding that Justin violated discovery rules and ordering him to produce all portions of the audio/video recordings of the alleged domestic violence allegations to Diamond?

17. Legal argument, including authorities:

- A. The district court violated Diamond's due process rights by not continuing the trial until after her criminal case(s) were completed.**

This Court reviews constitutional challenges de novo. *Mesi v. Mesi*, ___ Nev. ___, ___, 478 P.3d 366, 369 (2020), *quoting Callie v. Bowling*, 123 Nev. 181, 183, 160 P.3d 878, 879 (2007).

NRS 125C.0035 and Rebuttable Presumptions

Under NRS 125C.0035(k) and (5) Under NRS 125C.0035(k) and (5), the district court must consider acts of domestic violence against children, parents, or other persons residing with the children when making custodial best interest

determinations. When the district court finds by clear and convincing evidence after an evidentiary hearing that a parent has engaged in domestic violence against the children or other parent, there is a rebuttable presumption that sole or joint physical custody with the offending parent is not in the children's best interest. NRS 125C.0035(5). A "rebuttable presumption[]" require[s] the party against whom the presumption applies to disprove the presumed fact." *Law Offices of Barry Levinson, P.C. v. Milko*, 124 Nev. 355, 366, 184 P.3d 378 (2008). The opposing party rebuts the presumption by adducing evidence that tends to disprove the presumed fact. *Id.*³ Thus, a rebuttable presumption places an affirmative burden on an opposing party.

Due Process

The due process clause of the Fourteenth Amendment requires that a person be heard before they are deprived of an interest. *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976). Due process is satisfied when the opportunity to be heard is "at a meaningful time and in a meaningful manner." *Id.*, quoting *Armstrong v. Manzo*, 380 U.S. 545, 552 (1965). Due process is flexible. It takes time, place, and circumstances into consideration, tailoring its procedural protections to the particular situation's needs. *Mathews*, 424 U.S. at 334. The four-part test is: (a) the private interest that is affected by the official action; (b) the risk of erroneous deprivation of the interest through the procedure used; (c) the probable value, if any, of additional

³ As applied and EP challenge

or substitute procedural safeguards; and (d) the Government’s interest, “including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail.” *Id.* at 335.

- a. Diamond’s interest in the care, custody, and control of her child and her Fifth Amendment right are affected.

Fundamental liberty interest

“[T]he interest of parents in the care, custody, and control of their children-is perhaps the oldest of the fundamental liberty interests”. *Troxel v. Granville*, 530 U.S. 57, 65 (2000). Under NRS 126.036(1), “The liberty interest of a parent in the care, custody and management of the parent’s child is a fundamental right.” Accordingly, child custody matters must be decided on their merits. *Blanco v. Blanco*, 129 Nev. 723, 730, 311 P.3d 1170, 1175 (2013); *see also Price v. Dunn*, 106 Nev. 100, 105, 787 P.2d 785, 788 (1990) (discussing that, while Nevada’s underlying policy favors deciding cases on their merits, this concern is far greater in family cases).

Fifth Amendment

Under the Fifth Amendment, applicable to the states under the Fourteenth Amendment, a person cannot be compelled to testify against themselves in a criminal case. *See Spevack v. Klein*, 385 U.S. 511, 514 (1967). The United States Supreme Court interprets applicability of the Fifth Amendment to situations where

the sanction for invocation of the Fifth Amendment privilege is ““costly””. *Spevack*, 385 U.S. at 515, *quoting Griffin v. California*, 380 U.S. 609 (1965).

Thus, it applies in civil proceedings. *See Boyd v. United States*, 116 U.S. 616, 634-635 (1886) (applying it to the compulsory production of books and papers of the owner of goods sought to be forfeited); *Schlowner v. Board of Higher Education*, 350 U.S. 551 (1956) (applying it to the Charter Provisions of the City of New York as relates to employees); *Spevack v. Klein*, 385 U.S. 511 (1967) (applying it to production of the financial records and testimony of a lawyer in discipline proceedings).

This Court concludes the same, allowing persons in civil proceedings, including domestic matters, to protect their interest against self-incrimination when giving any testimony. *Meyer v. Second Judicial Dist. Ct.*, 95 Nev. 176, 180, 591 P.2d 259, 262 (1979). In domestic matters, the district court must determine that a party who volunteers to testify must either waive the Fifth Amendment privilege or “accept the consequence that such testimony will be stricken from the record.” *Meyer v. Second Judicial Dist. Ct.*, 95 Nev. 176, 180-81, 591 P.2d 259, 262 (1979). A person cannot testify only to those facts that are favorable and then refuse to answer questions on cross-examination or otherwise based on Fifth Amendment grounds. *Meyer*, 95 Nev. at 181, 591 P.2d at 262-63, *discussing Christenson v. Christenson*, 162 N.W.2d 194 (Minn. 1968).

Diamond's private interests are two fundamentally important constitutional interests. Her fundamental right to be a parent and her right to remain silent. The district court's action near eviscerated both rights. The district court found, by clear and convincing evidence, that Diamond committed acts of domestic violence. The underlying facts of Diamond's DV case were the predicate. Diamond's DV case had not yet been adjudicated. Diamond was forced to waive her Fifth Amendment rights and proceed forward, or the district court was automatically going to find NRS 125C.0035's rebuttable presumption against her. Diamond's private constitutional rights were gravely affected.

- b. The risk of erroneous deprivation is guaranteed through the procedure used.

When the custody trial precedes the criminal case(s) and the best interest findings that a parent has committed domestic violence are predicated on the underlying allegations and/or circumstances in the criminal case, the erroneous deprivation of a parent's interest(s) is all but guaranteed. NRS 125C.0035(5)'s rebuttable presumption *requires* the opposing parent to disprove that sole or joint custody is not in the children's best interest by giving evidence in order for that parent to be back on custodial equal footing. Domestic violence allegations are often comprised of they-said-they-said evidence, and physical evidence or lay witnesses are nonexistent. Therefore, to disprove the same, the only evidence that an opposing

parent may have is their own testimony. When the opposing parent's criminal case(s) has not been decided, the opposing parent must choose between presenting evidence to rebut the presumption (of which the majority will be the parent's own testimony),⁴ or forfeiting the ability to rebut the presumption, resulting in the custodial loss of the parent's children.

Thus, the opposing parent must choose between their Fifth Amendment right or their fundamental liberty interest in the care, custody, and control of their children.⁵ The procedure currently used—forcing the custody trial to proceed before adjudication of the criminal case—necessarily results in the erroneous deprivation of one of the party's constitutional rights.

Additionally, as seen in Diamond's case, the strict evidentiary and constitutional protections afforded a defendant in a criminal case, especially

⁴ NRS 125C.0035(5) necessarily conflicts with the constitutional due process mandate that all persons charged with a crime are innocent until the government proves that they are guilty beyond a reasonable doubt. Persons charged with a crime have no burden to prove, testify, or otherwise introduce evidence supporting that they are not guilty.

⁵ This procedure also presents the potential for NRS 125C.0035 to be unconstitutionally applied and could trigger an equal protection violation. It places a distinction on parents with criminally charged DV versus parents where DV is alleged, but not criminally charged. In the latter, the parent does not have to waive a constitutional right in order to have a fair custody trial.

The concerns about a criminally charged parent, the strict evidentiary and constitutional protections afforded a defendant in a criminal case.

concerning discovery, will then allow that parent to be on equal and sure footing when rebutting the NRS 125C.0035(5) presumption.

- c. The substitute procedural safeguard of continuing the custody trial until after judgment is rendered in the criminal case has a constitutionally significant probable value.

The substitute procedural safeguard the district court should employ is to continue a custody trial until disposition of a criminal case. Temporary custody orders can be set so as to give short-term resolution for parent-child issues. In doing so, the opposing parent no longer must choose between two fundamentally important constitutional rights. If the criminal case is dismissed or the parent found not guilty, the opposing parent is no longer in jeopardy of losing their children based on unfounded accusations they would be forced to concede to preserve Fifth Amendment rights or defend against to protect their parental liberty interests—waiving their Fifth Amendment rights.

- d. There is little to no fiscal or administrative burden on the Government.

There is no fiscal or administrative burden on the Government to stay the custody trial until adjudication in an underlying criminal case. A multitude of litigation occurs in a family case, and as a fiscal and policy matter, parties are

encouraged to resolve cases. Criminal matters typically move faster. No fiscal or administrative impact can ever outweigh a person's right to be heard or Nevada's public policy that child custody cases are heard on the merits.

Many times during the proceeding, the court recognized Diamond's mending criminal case and the problem with proceeding forward with the custody trial. However, once it got further along in the process, the district court pushed forward with the custody trial based only on clearing the docket. The parties, especially Justin, wanted to continue the trial until adjudication of the criminal trial. While maintaining judicial economy and case resolution are incredibly important, persons constitutional rights are more so. There are times when cases must be stayed and should yield to other interests.

Diamond's due process, fundamental parental liberty interests, and Fifth Amendment rights were denied. The district court's decision should be reversed and remanded for a new trial.

B. Did the district court err by not finding that Justin had to admit all of the audio and video recordings as relevant evidence and or under the doctrine of completeness, or alternatively, to continue the trial and order him to produce all portions of the audio/video recordings of the alleged domestic violence allegations to Diamond?

This Court reviews the district court's decision to admit or exclude evidence for an abuse of discretion. *Davis v. Beling*, 128 Nev. 301, 311, 278 P.3d 501, 508 (2012). Relevant evidence is "evidence having any tendency to make the existence of any fact that is of consequence . . . more or less probable than it would be without the evidence." NRS 48.015. All relevant evidence is admissible unless specifically proscribed as inadmissible. NRS 48.025. When a party introduces a recorded statement, "the party may be required at that time to introduce any other part of it which is relevant to the part introduced, and any party may introduce any other relevant parts." NRS 47.120.

Justin represented throughout the entire case that he had hours and hours of audio and video of the alleged DV incident. He was ordered many times to provide it to the court. His counsel was ordered to give it to the court by drop box. This was never done. Diamond specifically requested the audio and video in discovery. Justin did not produce it. The first that Diamond learned of its existence was during trial, when Justin testified that he had four hours of video and 30 hours of audio. The district court denied Diamond's request for the materials stating that it was a discovery issue. Diamond had no means to file a discovery motion because Justin affirmatively represented through discovery that it did not exist.

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The district court erred by not ordering that the complete video should have been introduced, rather than Justin's snippets. Further, the district court should have ordered that Justin turn the audio and video over and continued the trial until he did the same. Accordingly, the district court's decision should be remanded for a new trial with Diamond having the complete evidence to review.

18. Issues of first impression or of public interest. Does this appeal present a substantial legal issue of first impression in this jurisdiction or one affecting an important public interest: Yes ☒ No ☐ . If so, explain:

Whether a custody trial must be stayed until after a criminal case adjudication, where the underlying allegations in the criminal case are at issue in the custody case and/or under NRS 125C.0035, to protect a parent's constitutional rights is an issue of first impression.

19. Routing Statement:

This appeal is presumptively assigned to the Court of Appeals per NRAP 17(b)(5), because it involves an issue of family law. Appellant respectfully submits, however, that the Supreme Court retain this case pursuant to NRAP 17(a)(14), because the principal issue is a question of statewide public importance and there are no published decisions of the Court of Appeals or Supreme Court on whether a custody trial should be stayed until after a criminal case adjudication, where the

underlying allegations in the criminal case are at issue generally in the custody case and/or under NRS 125C.0035, to protect a parent's constitutional rights.

VERIFICATION

1. I hereby certify that this fast track statement complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because this fast track statement has been prepared in a proportionally spaced typeface using Microsoft Word–Office 365 Business in font type Times New Roman size 14.

2. I further certify that this fast track statement complies with the page- or type-volume limitations of NRAP 32(a)(7) because, excluding the parts of the brief exempted by NRAP 32(a)(7)(C), it is either:

☒ Proportionately spaced, has a typeface of 14 points or more and contains

4745 words; or

☐ Monospaced, has 10.5 or fewer characters per inch, and contains ____ words or ____ lines of text; or

☐ Does not exceed ____ pages.

3. Finally, I recognize that under NRAP 3E I am responsible for timely filing a fast track statement and that the Supreme Court of Nevada may impose sanctions for failing to timely file a fast track statement, or failing to raise material issues or arguments in the fast track statement. I therefore certify that the information

provided in this fast track statement is true and complete to the best of my knowledge, information, and belief.

DATED this 8th day of April, 2022.

McFARLING LAW GROUP

/s/ Amy A. Porray

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CERTIFICATE OF SERVICE

I, an employee of McFarling Law Group, hereby certify that on the 8th day of April, 2022, I served a true and correct copy of this Child Custody Fast Track Statement as follows:

☒ by United States mail in Las Vegas, Nevada, with First-Class postage prepaid and addressed as follows:

Justin Martin
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/s/ Crystal Beville
Crystal Beville