



**EIGHTH JUDICIAL DISTRICT COURT
CLERK OF THE COURT**

REGIONAL JUSTICE CENTER
200 LEWIS AVENUE, 3rd FL.
LAS VEGAS, NEVADA 89155-1160
(702) 671-4554

Electronically Filed
Jan 04 2022 06:49 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Steven D. Grierson
Clerk of the Court

Anntoinette Naumec-Miller
Court Division Administrator

January 4, 2022

Elizabeth A. Brown
Clerk of the Court
201 South Carson Street, Suite 201
Carson City, Nevada 89701-4702

RE: EVGENY SHAPIRO vs. NECHOLE GARCIA

S.C. CASE: 83992

D.C. CASE: D-20-612006-C

Dear Ms. Brown:

On December 21, 2021 our office submitted a Notice of Appeal packet for the above referenced case noting that the exhibits list(s) from November 3, 2021 were not included. The exhibits list has now been submitted and is enclosed. Please contact our office at (702) 671-0512 if you have any questions.

Sincerely,

STEVEN D. GRIERSON, CLERK OF THE COURT

/s/ Heather Ungermann

Heather Ungermann, Deputy Clerk

PLAINTIFF'S Exhibits

Exhibit Description	Offered	Objected	Admitted
1.			
2.			
3.			
4. SEE ATTACHED	11/5/21	No	11/5/21
5.			
6.			
7. SEE ATTACHED	11/5/21	No	11/5/21
8. SEE ATTACHED	11/5/21	No	11/5/21
9.			
10. SEE ATTACHED	11/5/21	No	11/5/21
11. SEE ATTACHED	11/5/21	No	11/5/21
12.			
13. SEE ATTACHED	11/5/21	No	11/5/21
14. SEE ATTACHED	11/5/21	No	11/5/21
15.			
16.			
17.			
18.			

PLAINTIFF'S Exhibits (Page 2)

Exhibit Description	Offered	Objected	Admitted
19.			
20. SEE ATTACHED	11/5/21	No	11/5/21
21.			
22. SEE ATTACHED	11/5/21	No	11/5/21
23.			
24. SEE ATTACHED	11/5/21	No	11/5/21
25. SEE ATTACHED (*admitted only bates 1646, 2040, 2041, 2356, 2357, 2412, 2413, 2437, 2639, 2640)	11/3/21	No	11/3/21
26.			
27.			
28.			
29.			
30.			
31. SEE ATTACHED	11/3/21	No	11/3/21
32.			
33. SEE ATTACHED	11/3/21	No	11/3/21
34.			
35.			
36.			

PLAINTIFF'S Exhibits (Page 3)

Exhibit Description	Offered	Objected	Admitted
37.			
38.			
39. SEE ATTACHED	11/3/21	No	11/3/21
40. SEE ATTACHED	11/3/21	No	11/3/21 SEALED
41.			
42.			
43.			
44.			
45.			
46.			
47.			
48.			
49. SEE ATTACHED	11/3/21	No	11/3/21 SEALED
50.			
51.			
52.			
53. SEE ATTACHED	11/3/21	No	11/3/21
54.			

PLAINTIFF'S Exhibits (Page 4)

Exhibit Description	Offered	Objected	Admitted
55.			
56. SEE ATTACHED	11/3/21	No	11/3/21
57. SEE ATTACHED	11/3/21	No	11/3/21
58.			
59.			
60. SEE ATTACHED	11/3/21	No	11/3/21
61.			
62.			
63.			
64.			
65.			
66. (Add-on) Plaintiff's 2018 Tax Return	11/5/21	No	11/5/21
67. (Add-on) Plaintiff's 2019 Tax Return	11/5/21	No	11/5/21
68. (Add-on) Plaintiff's 2020 Tax Return	11/5/21	No	11/5/21
69.			
70.			
71.			
72.			

EXH

THE ISSO & HUGHES LAW FIRM

JENNIFER ISSO, ESQ.

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Attorney for Plaintiff

DISTRICT COURT, FAMILY DIVISION
CLARK COUNTY, NEVADA

EVGENY SHAPIRO,

Plaintiff,

vs.

NECHOLE GARCIA,

Defendant.

CASE NO: D-20-612006-C

DEPT NO: N

PLAINTIFF'S TRIAL EXHIBIT PACKET

COMES NOW, Plaintiff, **EVGENY SHAPIRO**, by and through her attorney of record JENNIFER ISSO, and herewith submits the attached Exhibits as follows:

1. Plaintiff's Bank Statements; Eugene 009-0061
2. Plaintiff's Medicaid Statement; Eugene 0062-0065
3. Plaintiff's Paystubs; Eugene 0066-0079
4. Checks and Cash Paid to Defendant by Plaintiff; Eugene 0080-0121
5. Plaintiff's Citibank Citicard Statements; Eugene 0122-0313
6. Wal-Mart Receipts; Eugene 0314-0315
7. Proof of Humidifier Purchase; Eugene 0316-0317
8. Proof of Purchases for Baby Proofing. Eugene 0318-0322

9. Plaintiff's Bank of America Account ending in #9047 Statements and Transactions. Eugene 0323-0565
10. Wal-Mart receipts. Eugene 0566-0623
11. Amazon Manage Order. – Eugene 0624-0625
12. Plaintiff's Credit Report from all three agencies. Eugene 0626-0700
13. Child Medical Expenses. Eugene 0701-0705
14. Ledger of checks and cash given to Defendant. Eugene 0706-0707
15. Plaintiff's Employment information. Eugene 0708-0709
16. Plaintiff's 2018-2019 1099 and W-2 and Tax Returns. Eugene 0710-0756
17. Plaintiff's Retainer Agreements. Eugene 0757-0771
18. Pharmacy Records. Eugene 0772-0781
19. Medical Letters. Eugene 0782-0792
20. Plaintiff's traceable expenses report. Eugene 0793-0794
21. Plaintiff's Mortgage Statement. Eugene 0795-0799
22. Child expenses and receipt from Dr. Berquist. Eugene 0800-0823
23. Plaintiff's statements on Request for Production. Eugene 0824-0827
24. Plaintiff's PayPal Account. Eugene 0828-0844
25. Text Messages between the parties. Eugene 0845-2754
26. Photos and Videos of child 2018-2021.
27. E-Mail Correspondences between the Parties. Eugene 2755-2767
28. Eric Shapiro Discharge Summary. Eugene 2768-2769
29. Plaintiff's Cope Certificate. Eugene 2770-2771
30. Our Family Wizard Communications between the parties. Eugene 2772-3133
31. 2021 Additional Child Photos and Videos. Eugene 3134-3137
32. Mind Brian Institute Diagnosis. Eugene 3138-3139
33. Therapy Manage Group CARS Report Information. Eugene 3140-3152
34. Additional Our Family Wizard Communications. Eugene 3153-3294

35. Plaintiff's Additional Employment Information. Eugene 3295-3296
36. Plaintiff's Payments for Legal Fees. Eugene 3297-3333
37. Group Messages with Erin Suri from CCSD. Eugene 3334-3343
38. Depositions of Defendant, Plaintiff, and Kathleen Berquist. Eugene 3344-3699
39. Pictures of child with her brothers. Eugene 3700-3714
40. Pictures of child with scratches and diaper rash. Eugene 3715-3732
41. Additional Our Family Wizard Messages. Eugene 3733-3761
42. Nechole Garcia Electronic Medical Record. Eugene 3762-3875
43. List of City of Henderson Criminal Attorneys. Eugene 3876-3880
44. Plaintiff's E-Mail Correspondences. Eugene 3881-3897
45. Plaintiff's Winchester Concert Update. Eugene 3898-3900
46. Child Custody Evaluation and Exhibits Provided Under Cover by E-Mail.
47. Deposition of Montana Garcia. Eugene 3901-3990
48. Mind Brain Institute Psychological Progress Report. Eugene 3991-3996
49. Teladoc Health inc. records for Nechole Garcia. Eugene 3997-4111
50. Deposition Certification. Eugene 4112-4113
51. Attorney Retainer for Evidentiary Hearing. Eugene 4114-4119
52. Our Family Wizard Messages. Eugene 4120-4461
53. Dr. Gaspar Pediatric Report. Eugene 4462-4467
54. Additional Our Family Wizard Messages. Eugene 4468-4477
55. USB Flash Drive containing 49 videos and 58 pictures hand delivered to opposing counsel on 9-13-21.
56. Carter Counseling Autism treatment plan. Eugene 4478-4483
57. Firefly treatment plan for ABA Therapy. Eugene 4484-4508
58. Child's CCSD Assessment. Eugene 4518-4532
59. Child's Draft IEP. Eugene 4533-4548
60. Child's TMG Exit Records. Eugene 4549-4573

- 1 61. Plaintiff's E-Mails with Heather Tauchen. Eugene 4574-4576
- 2 62. Plaintiff's FDF filed 10-1-21. Eugene 4577-4593
- 3 63. Additional Our Family Wizard Messages. Eugene 4594-4624
- 4 64. Plaintiff's Screenshots. Eugene 4625-4635

Exhibit	Offered	Objected	Admitted	
1. Plaintiff's Bank Statements	2/28/21			
2. Plaintiff's Medicaid Statement. Bates	2/28/21			
3. Plaintiff's Paystubs.	2/28/21			
4. Checks and Cash Paid to Defendant by Plaintiff.	2/28/21			
5. Plaintiff's Citibank Citicard Statements	2/28/21			
6. Wal-Mart Receipts	2/28/21			
7. Proof of Humidifier Purchase	2/28/21			
8. Proof of Purchases for Baby Proofing	2/28/21			
9. Plaintiff's Bank of America Account ending in #9047 Statements and Transactions	2/28/21			
10. Wal-Mart receipts	2/28/21			
11. Amazon	2/28/21			

Ex.	Description	Offered	Obj.	Admitted
A	Videos from Nursery: Defendant Ex A-0001			
B	Defendant's Fee Agreement and Invoices with Rosenblum Allen Law Firm: Defendant Ex B-0001 – Defendant Ex B-0064			
C	Therapy Management Group Reports and Communication: Defendant Ex C-0001 – Defendant Ex C-0194			
D	Holiday Visitation Communication and Image of Ava from Christmas: Defendant Ex D-0001 – Defendant Ex D-0004			
E	Plaintiff's Gig Work: Defendant Ex E-0001 – Defendant Ex E-0014			
F	Images of Ava with Bruises: Defendant Ex F-0001 – Defendant Ex F-0004			

		OFFERED	OBJ	ADMITTED
G	Constructive Arrears: Defendant Ex G-0001 – Defendant Ex G-0043			
H	Messages Between Parties: Defendant Ex H-0001 – Defendant Ex H-0028			
I	All Our Family Wizard Communications, Updated 09.02.2021: Defendant Ex I-0001 - Defendant Ex I -0900			
J	Emails with ABA Therapist, Heather Tauchen: Defendant Ex J- 0001 – Defendant Ex J-0002			
K	Written Communication Between Counsels Dated 08.09.2021: Defendant Ex K-0001			
L	Dr. Gaspar's Report for Ava: Defendant Ex L-0001 – Defendant Ex L-0005			
M	Dr. Pickar's CV: Defendant Ex M- 0001 – Defendant Ex M-0020	11/3/21	No	11/3/21

		OFFERED	OBJ	ADMITTED
N	Plaintiff's Financial Disclosure Form: Defendant Ex N-0001 – Defendant Ex N-0024			
O	Defendant's Financial Disclosure Form: Defendant Ex O-0001 – Defendant Ex O-0010			
P	Evgeny Shapiro's Deposition, For Publication Only: Defendant Ex P- 0001 – Defendant Ex P-0057			
Q	Dr. Bergquist's Deposition, For Publication Only: Defendant Ex Q- 0001 – Defendant Ex Q-0105			
R	AFCC Model Custody Standards: Defendant Ex R-0001 – Defendant Ex R-0027			
S	Family Court Review, Special Needs Child, Mermelstein: Defendant Ex S-0001 – Defendant Ex S-0013			

		OFFERED	OBJ	ADMITTED
T	Family Court Review, Special Needs Child, Rappoport: Defendant Ex T-0001 – Defendant Ex T-0015			
U	Dr. Pickar's Report: Defendant Ex U-0001 – Defendant Ex U-0014	11/3/21	Yes	11/3/21
V	Statement related to health insurance for the minor child, Defendant Ex V-0001	11/5/21	No	11/5/21
W	Plaintiff's Bank Records, Defendant Ex W-0001 – Defendant Ex W-0086	11/5/21	No	11/5/21
X	Early Intervention Exceptions to Mask Mandate and In-Clinic Policies - Defendant Ex W-0001			
Y	TMG Follow Up, Defendant Ex Y- 0001			
Z	Coparenting Concerns Involving CCSD, Defendant Ex Z-0001 to Defendant Ex Z-0015	11/5/21 <small>(*Offered and admitted only bates 4, 13, 15)</small>	No	11/5/21 (in part*)

		OFFERED	OBJ	ADMITTED
AA	Emails between parties and Health Plan of Nevada, Defendant Ex AA-0001 to Defendant Ex AA-0004			
BB	Plaintiff's Go Fund Me, Defendant Ex BB-0001 to Defendant Ex BB-0007			
CC	Plaintiff's Answers to Interrogatories, Defendant CC-0001 to Defendant CC-0012			
DD	Plaintiff's Responses to Requests for Production of Documents, Defendant Ex DD-0001 to Defendant Ex DD-0008			

EE	Defendant's 2018 Tax Return	11/5/21	No	11/5/21
FF	Defendant's 2019 Tax Return	11/5/21	No	11/5/21
GG	Defendant's 2020 Tax Return	11/5/21	No	11/5/21