

IN THE SUPREME COURT OF THE STATE OF NEVADA

BRADLEY JOHN BELLISARIO

Appellant,

v.

EMILY BELLISARIO,

Respondent.

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Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court No.: 84128

District Court No.: D605263

**APPEAL FROM FINDINGS OF FACT, CONCLUSIONS OF LAW, AND
DECREE OF DIVORCE**

Eighth Judicial District Court of the State of Nevada

In and for the County of Clark

THE HONORABLE MARY PERRY

DISTRICT COURT JUDGE

APPELLANT APPENDIX – VOL. 11 PART 2

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15	12/20/2021	Plaintiff's Exhibit 25	AA3681
15	12/20/2021	Plaintiff's Exhibit 26	AA3682-3720
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16	12/20/2021	Plaintiff's Exhibit 28	AA3800-3802
16	12/20/2021	Plaintiff's Exhibit 29	AA3803-3805
16	12/20/2021	Plaintiff's Exhibit 30	AA3806-3824
16	12/20/2021	Plaintiff's Exhibit 31	AA3825-3841
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16	12/20/2021	Plaintiff's Exhibit 58	AA3964-3966
16	12/20/2021	Plaintiff's Exhibit 59	AA3967-3971
16	12/20/2021	Plaintiff's Exhibit 60	AA3972-3982
16	12/20/2021	Plaintiff's Exhibit 61	AA3983-3984
16	12/20/2021	Plaintiff's Exhibit 62	AA3985
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17	12/20/2021	Plaintiff's Exhibit 106	AA4100-4102
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17	12/20/2021	Plaintiff's Exhibit 108	AA4124
17	12/20/2021	Plaintiff's Exhibit 109	AA4125-4177
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19	12/20/2021	Plaintiff's Exhibit 122	AA4606-4608
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2	12/01/2020	Affidavit of Sandra L. Pomrenze	AA0334-336
5	02/08/2021	Affidavit of Service	AA1044
8	03/03/2021	Affidavit of Service	AA1755
2	11/25/2020	Affidavit Regarding Grounds for Disqualification of Judge	AA0327-333
6	02/10/2021	Affidavit Regarding Grounds for Disqualification of Judge	AA1272-1351
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5	02/07/2021	Bradley Bellisario's Financial Disclosure Form	AA1034-1040
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7	03/02/2021	Order Shortening Time	AA1745-1747
3	01/11/2021	Peremptory Challenge	AA0582-583
14	12/20/2021	Plaintiff's Exhibit 1	AA3477-3480
15	12/20/2021	Plaintiff's Exhibit 10	AA3540-3546
17	12/20/2021	Plaintiff's Exhibit 100	AA4079-4080
17	12/20/2021	Plaintiff's Exhibit 101	AA4081-4082
17	12/20/2021	Plaintiff's Exhibit 102	AA4083-4087
17	12/20/2021	Plaintiff's Exhibit 103	AA4088-4097
17	12/20/2021	Plaintiff's Exhibit 105	AA4098-4099
17	12/20/2021	Plaintiff's Exhibit 106	AA4100-4102
17	12/20/2021	Plaintiff's Exhibit 107	AA4103-4123
17	12/20/2021	Plaintiff's Exhibit 108	AA4124
17	12/20/2021	Plaintiff's Exhibit 109	AA4125-4177
15	12/20/2021	Plaintiff's Exhibit 11	AA3547-3556
17	12/20/2021	Plaintiff's Exhibit 110	AA4178-4192
17	12/20/2021	Plaintiff's Exhibit 111	AA4194-4205
17-18	12/20/2021	Plaintiff's Exhibit 112	AA4206-4267
18	12/20/2021	Plaintiff's Exhibit 113	AA4268-4319
18	12/20/2021	Plaintiff's Exhibit 114	AA4320-4339
18	12/20/2021	Plaintiff's Exhibit 115	AA4340-4355

18	12/20/2021	Plaintiff's Exhibit 116	AA4356-4415
18	12/20/2021	Plaintiff's Exhibit 117	AA4416-4495
18-19	12/20/2021	Plaintiff's Exhibit 118	AA4496-4541
19	12/20/2021	Plaintiff's Exhibit 119	AA4542-4559
15	12/20/2021	Plaintiff's Exhibit 12	AA3557-3580
19	12/20/2021	Plaintiff's Exhibit 120	AA4560-4603
19	12/20/2021	Plaintiff's Exhibit 121	AA4604-4605
19	12/20/2021	Plaintiff's Exhibit 122	AA4606-4608
19	12/20/2021	Plaintiff's Exhibit 123	AA4609-4613
19	12/20/2021	Plaintiff's Exhibit 124	AA4614-4617
15	12/20/2021	Plaintiff's Exhibit 13	AA3580-3591
15	12/20/2021	Plaintiff's Exhibit 14	AA3592-3602
15	12/20/2021	Plaintiff's Exhibit 15	AA3603-3613
15	12/20/2021	Plaintiff's Exhibit 16	AA3614-3625
15	12/20/2021	Plaintiff's Exhibit 17	AA3626-3638
15	12/20/2021	Plaintiff's Exhibit 18	AA3639-3646
15	12/20/2021	Plaintiff's Exhibit 19	AA3647-3653
14	12/20/2021	Plaintiff's Exhibit 2	AA3481-3488
15	12/20/2021	Plaintiff's Exhibit 20	AA3654-3659

15	12/20/2021	Plaintiff's Exhibit 21	AA3660-3669
15	12/20/2021	Plaintiff's Exhibit 22	AA3670-3677
15	12/20/2021	Plaintiff's Exhibit 23	AA3678-3679
15	12/20/2021	Plaintiff's Exhibit 24	AA3680
15	12/20/2021	Plaintiff's Exhibit 25	AA3681
15	12/20/2021	Plaintiff's Exhibit 26	AA3682-3720
15-16	12/20/2021	Plaintiff's Exhibit 27	AA3721-3799
16	12/20/2021	Plaintiff's Exhibit 28	AA3800-3802
16	12/20/2021	Plaintiff's Exhibit 29	AA3803-3805
14	12/20/2021	Plaintiff's Exhibit 3	AA3489-3493
16	12/20/2021	Plaintiff's Exhibit 30	AA3806-3824
16	12/20/2021	Plaintiff's Exhibit 31	AA3825-3841
16	12/20/2021	Plaintiff's Exhibit 32	AA3842-3853
16	12/20/2021	Plaintiff's Exhibit 33 (video)	
16	12/20/2021	Plaintiff's Exhibit 34	AA3853-3859
16	12/20/2021	Plaintiff's Exhibit 35	AA3860-3862
16	12/20/2021	Plaintiff's Exhibit 36	AA3863-3864
16	12/20/2021	Plaintiff's Exhibit 37	AA3865-3866
16	12/20/2021	Plaintiff's Exhibit 38	AA3867-3869
16	12/20/2021	Plaintiff's Exhibit 39	AA3870-3873
14	12/20/2021	Plaintiff's Exhibit 4	AA3494-3497

16	12/20/2021	Plaintiff's Exhibit 40	AA3874-3935
16	12/20/2021	Plaintiff's Exhibit 41 (video)	
16	12/20/2021	Plaintiff's Exhibit 42	AA3937-3940
16	12/20/2021	Plaintiff's Exhibit 43 (video)	
16	12/20/2021	Plaintiff's Exhibit 44 (video)	
16	12/20/2021	Plaintiff's Exhibit 45A (video)	
16	12/20/2021	Plaintiff's Exhibit 45B (video)	
16	12/20/2021	Plaintiff's Exhibit 45C (video)	
14-15	12/20/2021	Plaintiff's Exhibit 5	AA3498-3508
16	12/20/2021	Plaintiff's Exhibit 53	AA3943-3945
16	12/20/2021	Plaintiff's Exhibit 54	AA3946
16	12/20/2021	Plaintiff's Exhibit 55	AA3947-3952
16	12/20/2021	Plaintiff's Exhibit 56	AA3953
16	12/20/2021	Plaintiff's Exhibit 57	AA3954-3963
16	12/20/2021	Plaintiff's Exhibit 58	AA3964-3966
16	12/20/2021	Plaintiff's Exhibit 59	AA3967-3971
15	12/20/2021	Plaintiff's Exhibit 6	AA3509-3515
16	12/20/2021	Plaintiff's Exhibit 60	AA3972-3982
16	12/20/2021	Plaintiff's Exhibit 61	AA3983-3984
16	12/20/2021	Plaintiff's Exhibit 62	AA3985
16	12/20/2021	Plaintiff's Exhibit 64	AA3986-3994
16	12/20/2021	Plaintiff's Exhibit 65	AA3995
16	12/20/2021	Plaintiff's Exhibit 66	AA3996-3997
16	12/20/2021	Plaintiff's Exhibit 67 (video)	
16	12/20/2021	Plaintiff's Exhibit 68 (video)	
16	12/20/2021	Plaintiff's Exhibit 69 (video)	

15	12/20/2021	Plaintiff's Exhibit 7	AA3516-3525
16-17	12/20/2021	Plaintiff's Exhibit 72	AA4000-4009
17	12/20/2021	Plaintiff's Exhibit 73	AA4010-4011
17	12/20/2021	Plaintiff's Exhibit 74	AA4012-4013
17	12/20/2021	Plaintiff's Exhibit 75	AA4014-4015
17	12/20/2021	Plaintiff's Exhibit 76	AA4016-4017
17	12/20/2021	Plaintiff's Exhibit 77	AA4018-4019
17	12/20/2021	Plaintiff's Exhibit 78	AA4020
17	12/20/2021	Plaintiff's Exhibit 79	AA4021
15	12/20/2021	Plaintiff's Exhibit 8	AA3526-3532
17	12/20/2021	Plaintiff's Exhibit 80	AA4022
17	12/20/2021	Plaintiff's Exhibit 82	AA4023-4026
17	12/20/2021	Plaintiff's Exhibit 83	AA4027-4030
17	12/20/2021	Plaintiff's Exhibit 84	AA4031-4035
17	12/20/2021	Plaintiff's Exhibit 89	AA4036-4064
15	12/20/2021	Plaintiff's Exhibit 9	AA3533-3539
17	12/20/2021	Plaintiff's Exhibit 91	AA4065-4068
17	12/20/2021	Plaintiff's Exhibit 92	AA4069
17	12/20/2021	Plaintiff's Exhibit 94	AA4070
17	12/20/2021	Plaintiff's Exhibit 97	AA4071
17	12/20/2021	Plaintiff's Exhibit 98	AA4072-4078
14	11/19/2021	Plaintiff's Initial List of Witnesses	AA3438-3445

20	12/21/2021	Plaintiff's Notice of Filing Exhibits Under Seal Exhibit "124"	AA4863-4865
9	03/30/2021	Plaintiff's Opposition to Defendant's Motion for a Protective Order; and Countermotion for Attorney's Fees and Costs and Related Relief	AA2121-2135
14	11/19/2021	Plaintiff's Pre-Trial Memorandum	AA3414-3437
14	12/20/2021	Plaintiff's Trial Exhibit List with Exhibits Offered/Admitted/Denied/Objections	AA3460-3476
2	04/29/2020	Reply to Counterclaim	AA0301-303
7	02/23/2021	Reply to Judge Mary Perry's Response to Defendant's Motion to Disqualify Judge	AA1662-1670
2	04/29/2020	Reply to Opposition	AA0268-283
8	03/04/2021	Reply to Opposition to Defendant's Motion to Disqualify Judge Pursuant to NCJC 2.11; Countermotion for Award of Attorney's Fees and Costs	AA1756-1797
10-11	04/29/2021	Reply to Plaintiff's Opposition to Defendant's Motion for Relief From Order After Hearing Regarding Hearing on January 25, 2021 and Motion for Leave to File Renewed Motion to Disqualify Judge Mary Perry; and Countermotion for Leave of Court to Refinance, to Deem Defendant Vexatious Litigant, Waive Donna's House Fees, and for an Award of Attorney's Fees and Costs	AA2479-2508
11	04/29/2021	Reply to Plaintiff's Opposition to Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021; and Countermotion for An Award of Attorney's Fees and Costs	AA2509-2516
13	05/17/2021	Reply to Plaintiff's Opposition to Defendant's Motion to Remove S.C.R.A.M. Device; And Opposition to Plaintiff's Motion to Drug Test Defendant, for an Award of Attorney's Fees and Costs, and Related Relief	AA3004-3013
7	02/16/2021	Response to Defendant's Motion to Disqualify Judge	AA1549-1554

5	02/05/2021	Schedule of Arrears for Child Support With Confirmation Pursuant to EDCR 5.508	AA1004-1013
5	02/05/2021	Schedule of Arrears for Temporary Support with Confirmation Pursuant to EDCR 5.508	AA1014-1021
2	06/10/2020	Stipulation and Order dated June 10, 2020	AA0304-307
12	05/10/2021	Supplemental [sic] to Opposition to Defendant's Motion for Relief from Order After Hearing Regarding the Hearing on January 25, 2021, and Motion for Leave to File a Renewed Motion to Disqualify Judge Perry and Countermotion for Leave of Court to Refinance, to Deem Defendant a Vexatious Litigant, Waive Donna's House Fees, and for an Award of Attorney's Fees and Costs	AA2779-2785
13	05/18/2021	Transcript from Hearing on May 18, 2021 re: All Pending Motions	AA3026-3069
19-20	12/20/2021	Transcript From Non-Jury Trial on December 20, 2021	AA4618-4862
14	09/16/2021	Transcript From September 16, 2021, Hearing re: Return Hearing	AA3354-3361
9-10	04/06/2021	Transcript re: April 6, 2021, Hearing on All Pending Motions	AA2175-2270
13	06/16/2021	Transcript re: Court Hearing on June 16, 2021, at 10:00 a.m. re: All Pending Motions	AA3159-3165
7	02/11/2021	Transcript re: Hearing on February 11, 2021, on All Pending Motions	AA1546-1548
4	01/25/2021	Transcript re: Hearing on January 25, 2021, Status Check	AA0859-863
14	07/07/2021	Transcript re: Hearing on July 7, 2021 re: All Pending Motions	AA3257-3265
9	03/17/2021	Transcript re: Hearing on Motion to Compel Discovery on March 17, 2021	AA2067-2081
10	04/07/2021	Transcript re: Hearing re: Status Check	AA2273-2284
8	03/04/2021	Transcript re: March 4, 2021, Court Hearing on All Pending Motions	AA1799-1816
12	05/11/2021	Transcripts from May 11, 2021, Hearing re: Return Hearing	AA2791-2807

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 Appellant's Appendix Volume 11 Part 2 as follows:

☒ via the Supreme Court's electronic filing and service system (eFlex):

Amanda Roberts, Esq.
efile@lvfamilylaw.com

/s/ Crystal Beville
Crystal Beville

1 As to Bradley's Subpoena to State of Nevada Board of Examiners for
2 Marriage & Family Therapists & Clinical Professional Counselors related to Donna
3 Wilburn; she is not a Party to this action and she does not have information which
4 is relevant to claims in this action. Moreover, Bradley currently has a civil lawsuit
5 pending regarding Donna Wilburn as set forth herein below. Additionally, Judge
6 Perry denied a request to consolidate the civil cases to this matter.
7

8
9 Civil Cases:

10 As Bradley is an attorney, and he has repeatedly filed civil suits against
11 therapist for Brayden, attorneys for Emily and Emily herself. Those civil lawsuits
12 are as follows:
13

- 14 ▪ A-20-812996-C (against Emily);
- 15 ▪ A-20-815348-C (against Donna Wilburn);
- 16 ▪ A-20-825422-C (against Anna Trujillo);
- 17 ▪ A-20-825505-C (Marathon Legal Group/Joe Riccio);
- 18 ▪ A-20-825508-C (against RSFLG/Amanda Roberts); and
- A-21-830901-C (against Emily, RSFLG/Amanda Roberts, Clark
County, et. al.).

19 Bradley is essentially harassing anybody who would provide information
20 negative to his position, or who is assisting Emily in this matter. Bradley's
21 behavior is vexatious and could easily be resolved in this matter; however, Bradley
22 uses this tactic in filing separate legal actions to eat up valuable time and resources
23 in an unreasonable manner.
24

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1 Attempts to Resolve:

2 Prior to filing this Motion, Emily's Counsel attempted in good faith to
3
4 resolve the issues with Bradley, in accordance with *EDCR* §5.501 and §5.602. A
5 Discovery Dispute Conference was scheduled and formally noticed by Emily's
6 Counsel, but Bradley demanded the date be changed. Thereafter, Ms. Roberts
7 suggested additional times because she was in Trial and Bradley refused to attend.
8
9 As such, Ms. Roberts sent Bradley a detailed correspondence regarding the
10 discovery issues, Bradley responded and Ms. Roberts again responded.¹⁵ However,
11 the actual Discovery Dispute Conference has not happened because the timeframe
12 is so limited related to the period in which a response must be filed to objection to a
13 Subpoena.
14

15 **III.**
16 **Legal Analysis**

17 A. Emily's request for protection Order relating to discovery propounded
18 upon by Bradley should be granted.

19 Pursuant to *NRCP* §26 (a) discovery is permitted once a Party has complied
20 with *NRCP* §16.2. In this matter, Bradley has failed to comply with *NRCP* § 16.2
21 even though the Court Rules require his compliance and Bradley was specifically
22 Ordered by the District Court Judge and Discovery Commissioner to comply.
23

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¹⁵ The referenced correspondences are attached to the companion filing as **Exhibit "15"** and are
27 hereby fully incorporated herein by reference.

1 Moreover, *NRC*P § 26 (b)(1) permits discovery of,

2 [N]onprivileged matter that is relevant to any party's
3 claims or defenses and proportional to the needs of the
4 case, considering the importance of the issues at stake in
5 the action, the amount in controversy, the parties' relative
6 access to relevant information, the parties' resources, the
7 importance of the discovery in resolving the issues, and
8 whether the burden or expense of the proposed discovery
9 outweighs its likely benefit. Information within this
10 scope of discovery need not be admissible in evidence to
11 be discoverable.

12 This matter is a divorce action involving minor children. The claims include
13 division of assets and debts, alimony, child custody, domestic violence and child
14 support. As set forth herein, had Bradley complied with *NRC*P § 16.2, then the
15 issues really relate to only four (4) Subpoenas: AAA Flooring, Inc.; Allied Flooring
16 Services; Nevada State Bar; and State of Nevada Board of Examiners for Marriage
17 & Family Therapists & Clinical Professional Counselors. However, since Bradley
18 failed to follow the Court Rules and Court Orders, this Motion relates to all
19 discovery sought by Bradley.

20 In the Subpoenas to AAA Flooring, Inc. and Allied Flooring Services,
21 Bradley is seeking the entire employee file related to Emily, and bank statements
22 showing payments to Emily. The issue is that Bradley does not limit the period of
23 the request. As such, Emily is seeking pursuant to *NRC*P § 26 (c)(B) specifying the
24 terms to the period during the Parties' marriage from August 16, 2014 to present;
25

1 and restricting the bank statements to any specific checks or payments related to
2 Emily for the same period.

3
4 In the Subpoenas to the State Bar of Nevada, Bradley is seeking a complete
5 copy of the file for Amanda M. Roberts, Esq., State Bar of Nevada No. 9294.
6 Pursuant to *NRCP* § 26 (b)(1) the request is not relevant to a claim in this case.
7 Moreover, Judge Perry has already dismissed the request to hold Amanda M.
8 Roberts, Esq., in contempt as she is not a Party to the action. There are no pending
9 issues relevant to Attorney Roberts related to the issues in this matter and the
10 information is not relevant. As such, pursuant to *NRCP* § (c)(A) and (D), Bradley
11 should be forbidden from obtaining discovery regarding Amanda M. Roberts, Esq.,
12 and inquiring regarding her in this matter. As explained herein, Bradley already has
13 an open case against Amanda M. Roberts, Esq., and this is not the proper location
14 for him to seek said information.

15
16 Based upon the foregoing, Bradley is not permitted to conduct any discovery
17 and Emily should be protected from Bradley's requests and Subpoena's until
18 further Order of this Court.

19
20 B. Emily's request for an award of attorney fees and costs should be
21 granted.

22
23 Prior to filing this Motion, Emily's Counsel attempted in good faith to
24 resolve the issues with Bradley, in accordance with *EDCR* §5.501 and §5.602. A
25 Discovery Dispute Conference was scheduled and formally noticed by Emily's
26
27

1 Counsel, as well as correspondence between Bradley and Emily's Counsel
2 occurred, but no resolution could be reached and Bradley did not attend the
3
4 Discovery Dispute Conference. As a result, this Motion had to be filed to protect
5 Emily's rights.

6 One of the prevailing cases regarding attorney fees is *Brunzell v. Golden*
7
8 *Gate National Bank*, 85 Nev. 345, 455 P.2d 31 (1969). In *Brunzell* the Nevada
9 Supreme Court set forth the factors, now known as the Brunzell Factors, which the
10 Court considered "well known basic elements to be considered" when awarded
11 attorney fees. The Court said each factor should be According the Brunzell
12 Factors are as follows:

- 14 1. The quality of advocacy;¹⁶
- 15 2. The character of the work to be done;¹⁷
- 16 3. The work actually performed by the lawyer;¹⁸ and
- 17 4. The results obtained.

18 **Quality of Advocacy**

19 Emily's Counsel has been practicing law since 2005 and focuses her practice
20 area primarily in the area of family law, and she is in good standing with the State
21

23 ¹⁶ When considering the quality of the advocacy the Court should look at the attorney's ability,
24 training, education, professional standing, and skill.

25 ¹⁷ When considering the character of the work to be done the Court should look at the difficulty,
intricacy, importance, time, skill required, the responsibility imposed, and the character of the
26 Party when they have a relevancy to the litigation.

27 ¹⁸ When considering the work performed the Court should consider the skill, time, and attention
given to the work.

1 Bar of Nevada. Emily's Counsel participated in a weekly radio show geared at the
2 Clark County community, focused on issues relative to family law.

3
4 Yearly, Emily's Counsel attends continuing legal education classes to stay
5 abreast of changes in the area of family law. Through a practice primarily in family
6 law, Emily's Counsel has drafted countless Motions, argued before the District
7 Court and Hearing Master on issues related to domestic violence/custody/
8 divorce/adoption/termination of parental rights, brought and defended individuals at
9 Trials and Evidentiary Hearings. Additionally, Emily's Counsel has taken cases on
10 Appeal to the Supreme Court of Nevada.
11

12 **Character of Work Done**

13
14 Due to the fact that Emily's Counsel practices primarily in the area of family
15 law, she has regularly dealt with issues involved in violations of terms of Family
16 Court related Orders, child support enforcement, arrears, and wage assignments.
17 Emily's Counsel has spent hours attempting to resolve the issues, preparing
18 discovery and researching to send Subpoenas.
19

20 **Work Performed**

21
22 Emily's Counsel maintains a billing system and will prepare, in advance of
23 the hearing in this matter, a billing statement to address the actual attorney fees
24 extended by Emily relative to the discovery outlined herein, Motion and hearing.
25

1 Emily's Counsel bills at a rate of at least \$350.00 per hour which is a rate on par
2 with other attorneys practicing primarily in the area of family law.
3

4 The Nevada Supreme Court has indicated that the District Court is permitted
5 to award attorney fees when Nevada law establishes a basis for fees and the
6 *Brunzell* factors have been met. *Miller v. Wilfong*, 121 Nev. 619, 119 P.3d 727
7 (2005). The initial basis for fees is *NRS* § 125.040 (c) and subsequently the holding
8 in *Sargeant v. Sargeant*, 88 Nev. 223, 495 P.2d 618 (1972), wherein the Nevada
9 Supreme Court considered a wife's award of attorney fees. The husband argued the
10 attorney fees were excessive and should not have been granted from the husband's
11 sole and separate property. The Court determined that "[t]he wife must be afforded
12 her day in court without destroying her financial position. This would imply that
13 she should be able to meet her adversary in the courtroom on an equal basis."
14 Moreover, in this matter, Bradley has historically been the sole financial support for
15 the family and is clearly the higher income litigant and has the ability to pay the
16 attorney fees as Ordered. *Wright v. Osburn*, 114 Nev. 1367, 970 P.2d 1071 (1998).
17 Specifically, the Nevada Supreme Court indicated that "disparity in income is also a
18 factor to be considered in awarding attorney fees."
19
20
21
22

23 In *Cadle Co. v. Woods & Erickson, LLP*, 345 P.3d 1049 (2015), the Nevada
24 Supreme Court indicated when requesting costs, that the attorney must provide the
25 necessary statements or invoices to establish that the costs were "reasonable,
26
27
28

1 necessary, and actually incurred.” The Supreme Court indicated that something
2 more than the Affidavit of Counsel was required to establish the costs were
3 necessary. In this matter, the hard costs related to filing fees required by the
4 District Court and should be granted, there is no mechanism by which the filing
5 fees can be avoided in this specific case.
6

7 Emily believes she will prevail regarding this instant Motion, due to the facts
8 of this action and outlined herein above. As such, Emily is requesting this Court
9 grant Amanda M. Roberts, Esq., of Roberts Stoffel Family Law Group, attorney
10 fees and costs relating to this discovery matter and Motion.
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III.
Conclusion

Therefore, based upon the foregoing, Emily requests this Court to enter an
Order:

1. Granting Emily's request for a protective Order from Bradley propounding discovery;
2. Granting Emily's request for an Order awarding Emily attorney fees and costs; and
3. Any and all related relief the Court deems just and proper.

DATED this 3rd day of May, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

Amanda M. Roberts, Esq.
State of Nevada Bar No. 9294
4411 South Pecos Road
Las Vegas, Nevada 89121
PH: (702) 474-7007
FAX: (702) 474-7477
EMAIL: efile@lvfamilylaw.com
Attorneys for Plaintiff, Emily Bellisario

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1. I, Amanda M. Roberts, Esq., am over the age of eighteen (18) years old and I am competent to testify as to the matters contained within the affidavit.


2. I am Counsel for Plaintiff, Emily Bellisario, in the above-entitled matter and, I have personal knowledge of the facts contained herein and can testify to same.

3. Affiant has read the foregoing Motion and hereby certifies that the facts set forth herein are true of Affiant's own knowledge, except for those matters stated upon information and belief, and as to those matters, Affiant believes them to be true. Affiant incorporates these facts into this Affidavit as though fully set forth herein.

FURTHER AFFIANT SAYETH NAUGHT.

GHT.
Amanda M. Roberts
Amanda M. Roberts, Esq.

SUBSCRIBED and SWORN to before
me on this 3 day of May, 2021.

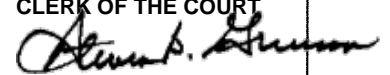

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Bradley Bellisario
Email: Bradb@bellisariolaw.com
Defendant in *proper person*

Page 18 of 18



1 **EXH**

2 Amanda M. Roberts, Esq.
3 State Bar of Nevada No. 9294

4 **ROBERTS STOFFEL FAMILY LAW GROUP**

5 4411 S. Pecos Road

6 Las Vegas, Nevada 89121

7 PH: (702) 474-7007

8 FAX: (702) 474-7477

9 EMAIL: efile@lvfamilylaw.com

10 Attorneys for Plaintiff, Emily Bellisario

11 **DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 EMILY BELLISARIO,

) Case No: D-20-605263-D

) Dept No: P

14 Plaintiff,

)

15 v.

) **EXHIBITS IN SUPPORT OF**

) **PLAINTIFF'S MOTION FOR**

16 BRADLEY BELLISARIO,

) **PROTECTION ORDER RELATING**

) **TO BRADLEY'S DISCOVERY**

17 Defendant.

) **REQUESTS AND SUBPOENA'S, FOR**

) **AN AWARD OF ATTORNEY'S FEES**

) **AND COSTS, AND RELATED**

) **RELIEF.**

)

18
19 In accordance with *EDCR* § 5.205, the Plaintiff, Emily Bellisario, hereby

20 submits Exhibits in Support of Motion for Protection Order Relating to Bradley's

21 Discovery Requests and Subpoena's, for an Award of Attorney's Fees and Costs,

22 and Related Relief as follows:
23
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25
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EXHIBIT	DESCRIPTION	BATE STAMP NUMBER
1.	Notice of Subpoena to AAA Flooring, Inc., served April 24, 2021	PLTF0629-PLTF0635
2.	Notice of Subpoena to Allied Flooring Services, served April 24, 2021	PLTF0636-PLTF0642
3.	Notice of Subpoena to Bank of America, served April 24, 2021	PLTF0643-PLTF0649
4.	Notice of Subpoena to Bank of Nevada, served April 24, 2021	PLTF0650-PLTF0656
5.	Notice of Subpoena to JNA Consulting Group, LLC, served April 24, 2021	PLTF0657-PLTF0663
6.	Notice of Subpoena to Johnson Martin Advisors, served April 24, 2021	PLTF0664-PLTF0670
7.	Notice of Subpoena to Chase Bank, served April 24, 2021	PLTF0671-PLTF0677
8.	Notice of Subpoena to Las Vegas Metropolitan Police Department, served April 24, 2021	PLTF0678-PLTF0684
9.	Notice of Subpoena to Nevada State Bank, served April 24, 2021	PLTF0685-PLTF0691
10.	Notice of Subpoena to Wells Fargo, served April 24, 2021	PLTF0692-PLTF0698
11.	Notice of Subpoena to Nevada State Bar, served April 24, 2021	PLTF0699-PLTF0705
12.	Notice of Subpoena to State of Nevada Board of Examiners for Marriage & Family Therapists & Clinical Professional Counselors, served April 24, 2021	PLTF0706-PLTF0712
13.	Defendant's First Set of Request for Production of Documents to Plaintiff, served April 25, 2021	PLTF0713-PLTF0727
14.	Defendant's request for dates for Emily's deposition to be taken served on April 26, 2021	PLTF0728

1		Correspondence from Defendant	
2		regarding Discovery Dispute served on	
3		April 27, 2021, Correspondence to	
4		Defendant regarding Discovery Dispute	
5		dates served on April 27, 2021,	
6		Correspondence to Defendant regarding	
7		Discovery Dispute and Subpoena's served	
8		on April 29, 2021, Correspondence from	
9	15.	Defendant regarding his Subpoena's	PLTF0729-PLTF0732

DATED this 3rd day of May, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M Roberts

Amanda M. Roberts, Esq.
 State of Nevada Bar No. 9294
 4411 S. Pecos Road
 Las Vegas, Nevada 89121
 PH: (702) 474-7007
 FAX: (702) 474-7477
 EMAIL: efile@lvfamilylaw.com
 Attorneys for Plaintiff, Emily Bellisario

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Bradley Bellisario
Email: Bradb@bellisariolaw.com
Defendant *in proper person*

Page 4 of 4

EXHIBIT “1”

EXHIBIT “1”

EXHIBIT “1”

1 **NOTC**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 EMILY BELLISARIO,
12 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

13 vs.

14 BRADLEY BELLISARIO,
15 Defendant

NOTICE OF SUBPOENA DUCES TECUM

16 PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena
17 will be served upon AAA Flooring, Inc., 2945 N Martin L King Blvd., Las Vegas, Nevada 89032,
18 if you have not objected and sought issuance of a protective order. A copy of the proposed
19 Subpoena is attached hereto and fully incorporated herein by reference.

20 DATED this 24th day of April 2021.

21 BY: /s/ Bradley Bellisario
22 Bradley Bellisario
23 *Plaintiff Pro Se*
24 7100 Grand Montecito Pkwy, #2054
25 Las Vegas, NV 89149
26 T: 309.397.6734
27 E: bradb@bellisariolaw.com

28 ///

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NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0629

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Amanda Roberts
ROBERTS STOFFEL FAMILY LAW GROUP
4411 S. Pecos Road
Las Vegas, NV 89121
Email: efile@lvfamilylaw.com
Attorney for Plaintiff, Emily Bellisario

/s/ Bradley Bellisario
Bradley Bellisario, *Defendant Pro Se*

1 **SUBP**

2 BRADLEY J. BELLISARIO

3 7100 Grand Montecito Pkwy, #2054

4 Las Vegas, NV 89149

5 T: (702) 936-4800

6 F: (702) 936-4801

7 E: BradB@BellisarioLaw.com

8 *Defendant Pro Se*

9 DISTRICT COURT

10 CLARK COUNTY, NEVADA

11 EMILY BELLISARIO,

12 Plaintiff,

13 vs.

14 BRADLEY BELLISARIO,

15 Defendant

Case No.: D-20-605263-D

Dept No.: P

SUBPOENA DUCES TECUM

16 **THE STATE OF NEVADA SENDS GREETINGS TO:**

17 **Custodian of Records**

18 **AAA Flooring Inc.**

19 **Attn: Subpoena Compliance Department**

20 **2495 N. Martin L King Blvd.**

21 **Las Vegas, Nevada 89032**

22 YOU ARE HEREBY COMMANDED that all and singular business and excuses set
23 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
24 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
25 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
26 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
27 Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
28 your attendance is not required.

SUBPOENA DUCES TECUM - 1

PLTF0631

AA2644

1 The relevant rules governing Subpoenas and Subpoena compliance are set forth in the
2 Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit "B."** If you fail to
3 appear or produce the requested documents, you will be deemed guilty of contempt of Court and
4 liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE
5 HUNDRED DOLLARS (\$100.00).
6

7
8 Steven D. Grierson, CLERK OF COURT
9

10
11 By: _____
12 Deputy Clerk

13 Date:
14
15

16
17 Submitted by: /s/ Bradley Bellisario
18 Bradley Bellisario
19 *Plaintiff Pro Se*
20 7100 Grand Montecito Pkwy, #2054
21 Las Vegas, NV 89149
22 T: 309.397.6734
23 E: bradb@bellisariolaw.com
24
25
26
27
28

SUBPOENA DUCES TECUM - 2

PLTF0632

AA2645

EXHIBIT "A"
LIST OF DOCUMENTS TO BE PRODUCED

1. A copy of any and all records in the employee file for EMILY BELLISARIO (DOB 07/24/1988; SSN: 530-63-1546) since the commencement of her employment, including, but not limited to;

a. Emily Bellisario's complete personnel file, to include all employment records including payroll and benefits, pay stubs, proof of payment, disciplinary file, etc.; and

b. Emily Bellisario's Internal Revenue Service Forms W-2 and 1099;

2. A copy of any and all records in the employee file for EMILY CARDONA (DOB 07/24/1988; SSN: 530-63-1546) since the commencement of her employment, including, but not limited to;

a. Emily Cardona's complete personnel file, to include all employment records including payroll and benefits, pay stubs, proof of payment, disciplinary file, etc.; and

b. Emily Cardona's Internal Revenue Service Forms W-2 and 1099;

3. A copy of any and all bank statements containing payments made to Emily Bellisario, Emily Cardona, and Graciela Cardona since the commencement of their employment.

EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by

SUBPOENA DUCES TECUM - 4

PLTF0634

AA2647

1 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
2 issued shows a substantial need for the testimony or material that cannot be otherwise met
3 without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

4 **(d) *Duties in responding to subpoena.***

5 (1) A person responding to a subpoena to produce documents shall produce them as
6 they are kept in the usual course of business or shall organize and label them to correspond with
the categories in the demand.

7 (2) When information subject to a subpoena is withheld on a claim that it is
8 privileged or subject to protection as trial preparation materials, the claim shall be made
9 expressly and shall be supported by a description of the nature of the documents,
communications, or things not produced that is sufficient to enable the demanding party to
contest the claim.

10
11 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
12 that person may be deemed a contempt of the court from which the subpoena issued.
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EXHIBIT “2”

EXHIBIT “2”

EXHIBIT “2”

1 **NOTC**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 EMILY BELLISARIO,
12 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

13 vs.

NOTICE OF SUBPOENA DUCES TECUM

14 BRADLEY BELLISARIO,
15 Defendant

16 PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena
17 will be served upon Allied Flooring Services, 1565 W. Brooks Ave., Las Vegas, Nevada 89032, if
18 you have not objected and sought issuance of a protective order. A copy of the proposed Subpoena
19 is attached hereto and fully incorporated herein by reference.

20 DATED this 24th day of April 2021.

21 BY: /s/ Bradley Bellisario
22 Bradley Bellisario
23 *Plaintiff Pro Se*
24 7100 Grand Montecito Pkwy, #2054
25 Las Vegas, NV 89149
26 T: 309.397.6734
27 E: bradb@bellisariolaw.com

28 ///

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NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0636

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Amanda Roberts
ROBERTS STOFFEL FAMILY LAW GROUP
4411 S. Pecos Road
Las Vegas, NV 89121
Email: efile@lvfamilylaw.com
Attorney for Plaintiff, Emily Bellisario

28

1 **SUBP**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 EMILY BELLISARIO,
12
13 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

14 vs.

SUBPOENA DUCES TECUM

15 BRADLEY BELLISARIO,
16
17 Defendant

18 **THE STATE OF NEVADA SENDS GREETINGS TO:**

19 **Custodian of Records**
20 **Allied Flooring Services**
21 **Attn: Subpoena Compliance Department**
22 **1565 W. Brooks Ave**
23 **Las Vegas, Nevada 89032**

24 YOU ARE HEREBY COMMANDED that all and singular business and excuses set
25 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
26 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
27 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
28 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
your attendance is not required.

SUBPOENA DUCES TECUM - 1

PLTF0638

1 The relevant rules governing Subpoenas and Subpoena compliance are set forth in the
2 Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit "B."** If you fail to
3 appear or produce the requested documents, you will be deemed guilty of content of Court and
4 liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE
5 HUNDRED DOLLARS (\$100.00).
6

7
8 Steven D. Grierson, CLERK OF COURT
9

10
11 By: _____
12 Deputy Clerk

13 Date:
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15

16
17 Submitted by: /s/ Bradley Bellisario
18 Bradley Bellisario
19 *Plaintiff Pro Se*
20 7100 Grand Montecito Pkwy, #2054
21 Las Vegas, NV 89149
22 T: 309.397.6734
23 E: bradb@bellisariolaw.com
24
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SUBPOENA DUCES TECUM - 2

PLTF0639

AA2653

EXHIBIT "A"
LIST OF DOCUMENTS TO BE PRODUCED

1. A copy of any and all records in the employee file for EMILY BELLISARIO (DOB 07/24/1988; SSN: 530-63-1546) since the commencement of her employment, including, but not limited to;

a. Emily Bellisario's complete personnel file, to include all employment records including payroll and benefits, pay stubs, proof of payment, disciplinary file, etc.; and

b. Emily Bellisario's Internal Revenue Service Forms W-2 and 1099;

2. A copy of any and all records in the employee file for EMILY CARDONA (DOB 07/24/1988; SSN: 530-63-1546) since the commencement of her employment, including, but not limited to;

a. Emily Cardona's complete personnel file, to include all employment records including payroll and benefits, pay stubs, proof of payment, disciplinary file, etc.; and

b. Emily Cardona's Internal Revenue Service Forms W-2 and 1099;

3. A copy of any and all bank statements containing payments made to Emily Bellisario, Emily Cardona, and Graciela Cardona since the commencement of their employment.

EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by

SUBPOENA DUCES TECUM - 4

PLTF0641

AA2655

1 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
2 issued shows a substantial need for the testimony or material that cannot be otherwise met
3 without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

4 **(d) Duties in responding to subpoena.**

5 (1) A person responding to a subpoena to produce documents shall produce them as
6 they are kept in the usual course of business or shall organize and label them to correspond with
the categories in the demand.

7 (2) When information subject to a subpoena is withheld on a claim that it is
8 privileged or subject to protection as trial preparation materials, the claim shall be made
9 expressly and shall be supported by a description of the nature of the documents,
communications, or things not produced that is sufficient to enable the demanding party to
contest the claim.

10
11 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
12 that person may be deemed a contempt of the court from which the subpoena issued.
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EXHIBIT “3”

EXHIBIT “3”

EXHIBIT “3”

NOTC

BRADLEY J. BELLISARIO
7100 Grand Montecito Pkwy, #2054
Las Vegas, NV 89149
T: (702) 936-4800
F: (702) 936-4801
E: BradB@BellisarioLaw.com
Defendant Pro Se

DISTRICT COURT
CLARK COUNTY, NEVADA

EMILY BELLISARIO,
Plaintiff,

vs.

BRADLEY BELLISARIO,
Defendant

Case No.: D-20-605263-D
Dept No.: P

NOTICE OF SUBPOENA DUCES TECUM

PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena will be served upon Bank of America, 300 South 4th Street, Las Vegas, Nevada 89101, if you have not objected and sought issuance of a protective order. A copy of the proposed Subpoena is attached hereto and fully incorporated herein by reference.

DATED this 24th day of April 2021.

BY: /s/ Bradley Bellisario
Bradley Bellisario
Plaintiff Pro Se
7100 Grand Montecito Pkwy, #2054
Las Vegas, NV 89149
T: 309.397.6734
E: bradb@bellisariolaw.com

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NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0643

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Amanda Roberts
ROBERTS STOFFEL FAMILY LAW GROUP
4411 S. Pecos Road
Las Vegas, NV 89121
Email: efile@lvfamilylaw.com
Attorney for Plaintiff, Emily Bellisario

/s/ Bradley Bellisario
Bradley Bellisario, *Defendant Pro Se*

1 **SUBP**
2 **BRADLEY J. BELLISARIO**
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 **EMILY BELLISARIO,**
12 **Plaintiff,**

Case No.: D-20-605263-D
Dept No.: P

13 **vs.**

SUBPOENA DUCES TECUM

14 **BRADLEY BELLISARIO,**
15 **Defendant**

16 **THE STATE OF NEVADA SENDS GREETINGS TO:**

17 **Custodian of Records**
18 **Bank of America**
19 **Attn: Subpoena Compliance Department**
20 **300 South 4th Street**
21 **Las Vegas, Nevada 89101**

22 **YOU ARE HEREBY COMMANDED** that all and singular business and excuses set
23 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
24 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
25 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
26 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
27 Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
28 your attendance is not required.

SUBPOENA DUCES TECUM - 1

PLTF0645

1 The relevant rules governing Subpoenas and Subpoena compliance are set forth in the
2 Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit "B."** If you fail to
3 appear or produce the requested documents, you will be deemed guilty of contempt of Court and
4 liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE
5 HUNDRED DOLLARS (\$100.00).
6

7
8 Steven D. Grierson, CLERK OF COURT
9

10
11 By: _____
12 Deputy Clerk

13 Date:
14
15

16
17 Submitted by: /s/ Bradley Bellisario
18 Bradley Bellisario
19 *Plaintiff Pro Se*
20 7100 Grand Montecito Pkwy, #2054
21 Las Vegas, NV 89149
22 T: 309.397.6734
23 E: bradb@bellisariolaw.com
24
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SUBPOENA DUCES TECUM - 2

PLTF0646

AA2661

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EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by

SUBPOENA DUCES TECUM - 4

PLTF0648

AA2663

1 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
2 issued shows a substantial need for the testimony or material that cannot be otherwise met
3 without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

4 **(d) Duties in responding to subpoena.**

5 (1) A person responding to a subpoena to produce documents shall produce them as
6 they are kept in the usual course of business or shall organize and label them to correspond with
the categories in the demand.

7 (2) When information subject to a subpoena is withheld on a claim that it is
8 privileged or subject to protection as trial preparation materials, the claim shall be made
9 expressly and shall be supported by a description of the nature of the documents,
communications, or things not produced that is sufficient to enable the demanding party to
contest the claim.

10
11 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
12 that person may be deemed a contempt of the court from which the subpoena issued.
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EXHIBIT “4”

EXHIBIT “4”

EXHIBIT “4”

1 **NOTC**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 EMILY BELLISARIO,
12 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

13 vs.

NOTICE OF SUBPOENA DUCES TECUM

14 BRADLEY BELLISARIO,
15 Defendant

16 PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena
17 will be served upon Bank of Nevada, One E. Washington St., Suite 1400, Phoenix, Arizona 85004,
18 if you have not objected and sought issuance of a protective order. A copy of the proposed
19 Subpoena is attached hereto and fully incorporated herein by reference.

20 DATED this 24th day of April 2021.

21 BY: /s/ Bradley Bellisario
22 Bradley Bellisario
23 *Plaintiff Pro Se*
24 7100 Grand Montecito Pkwy, #2054
25 Las Vegas, NV 89149
26 T: 309.397.6734
27 E: bradb@bellisariolaw.com

28 ///

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NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0650

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Amanda Roberts
ROBERTS STOFFEL FAMILY LAW GROUP
4411 S. Pecos Road
Las Vegas, NV 89121
Email: efile@lvfamilylaw.com
Attorney for Plaintiff, Emily Bellisario

28

1 **SUBP**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 EMILY BELLISARIO,
12
13 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

14 vs.

SUBPOENA DUCES TECUM

15 BRADLEY BELLISARIO,
16
17 Defendant

18 **THE STATE OF NEVADA SENDS GREETINGS TO:**

19 **Custodian of Records**
20 **Bank of Nevada**
21 **Attn: Subpoena Compliance Department**
22 **One E. Washington St., Suite 1400**
23 **Phoenix, Arizona 85004**

24 YOU ARE HEREBY COMMANDED that all and singular business and excuses set
25 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
26 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
27 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
28 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
your attendance is not required.

SUBPOENA DUCES TECUM - 1

PLTF0652

AA2668

1 The relevant rules governing Subpoenas and Subpoena compliance are set forth in the
2 Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit "B."** If you fail to
3 appear or produce the requested documents, you will be deemed guilty of contempt of Court and
4 liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE
5 HUNDRED DOLLARS (\$100.00).
6

7
8 Steven D. Grierson, CLERK OF COURT
9

10
11 By: _____
12 Deputy Clerk

13
14 Date:
15

16
17 Submitted by: /s/ Bradley Bellisario
18 Bradley Bellisario
19 *Plaintiff Pro Se*
20 7100 Grand Montecito Pkwy, #2054
21 Las Vegas, NV 89149
22 T: 309.397.6734
23 E: bradb@bellisariolaw.com
24
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SUBPOENA DUCES TECUM - 2

PLTF0653

AA2669

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EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or
- (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iv) subjects a person to undue burden.

(B) If a subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
 - (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by
- SUBPOENA DUCES TECUM - 4

PLTF0655

1 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
2 issued shows a substantial need for the testimony or material that cannot be otherwise met
3 without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

4 **(d) *Duties in responding to subpoena.***

5 (1) A person responding to a subpoena to produce documents shall produce them as
6 they are kept in the usual course of business or shall organize and label them to correspond with
the categories in the demand.

7 (2) When information subject to a subpoena is withheld on a claim that it is
8 privileged or subject to protection as trial preparation materials, the claim shall be made
9 expressly and shall be supported by a description of the nature of the documents,
communications, or things not produced that is sufficient to enable the demanding party to
contest the claim.

10
11 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
12 that person may be deemed a contempt of the court from which the subpoena issued.
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EXHIBIT “5”

EXHIBIT “5”

EXHIBIT “5”

1 **NOTC**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 EMILY BELLISARIO,
12 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

13 vs.

NOTICE OF SUBPOENA DUCES TECUM

14 BRADLEY BELLISARIO,
15 Defendant

16 PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena
17 will be served upon JNA Consulting Group, LLC, 410 Nevada Way, Suite 200, Boulder City,
18 Nevada 89005, if you have not objected and sought issuance of a protective order. A copy of the
19 proposed Subpoena is attached hereto and fully incorporated herein by reference.

20 DATED this 24th day of April 2021.

21 BY: /s/ Bradley Bellisario
22 Bradley Bellisario
23 *Plaintiff Pro Se*
24 7100 Grand Montecito Pkwy, #2054
25 Las Vegas, NV 89149
26 T: 309.397.6734
27 E: bradb@bellisariolaw.com

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NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0657

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Amanda Roberts
ROBERTS STOFFEL FAMILY LAW GROUP
4411 S. Pecos Road
Las Vegas, NV 89121
Email: efile@lvfamilylaw.com
Attorney for Plaintiff, Emily Bellisario

28

1 **SUBP**
2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 EMILY BELLISARIO,
12 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

13 vs.

SUBPOENA DUCES TECUM

14 BRADLEY BELLISARIO,
15 Defendant

16 **THE STATE OF NEVADA SENDS GREETINGS TO:**

17 **Custodian of Records**
18 **JNA Consulting Group, LLC**
19 **Attn: Subpoena Compliance Department**
20 **410 Nevada Way, Suite 200**
21 **Boulder City, Nevada 89005**

22 YOU ARE HEREBY COMMANDED that all and singular business and excuses set
23 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
24 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
25 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
26 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
27 Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
28 your attendance is not required.

SUBPOENA DUCES TECUM - 1

PLTF0659

The relevant rules governing Subpoenas and Subpoena compliance are set forth in the Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit “B.”** If you fail to appear or produce the requested documents, you will be deemed guilty of contempt of Court and liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE HUNDRED DOLLARS (\$100.00).

Steven D. Grierson, CLERK OF COURT

By: _____
Deputy Clerk

Date:

Submitted by: /s/ Bradley Bellisario
Bradley Bellisario
Plaintiff Pro Se
7100 Grand Montecito Pkwy, #2054
Las Vegas, NV 89149
T: 309.397.6734
E: bradb@bellisariolaw.com

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EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by

SUBPOENA DUCES TECUM - 4

PLTF0662

AA2679

1 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
2 issued shows a substantial need for the testimony or material that cannot be otherwise met
3 without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

4 **(d) Duties in responding to subpoena.**

5 (1) A person responding to a subpoena to produce documents shall produce them as
6 they are kept in the usual course of business or shall organize and label them to correspond with
the categories in the demand.

7 (2) When information subject to a subpoena is withheld on a claim that it is
8 privileged or subject to protection as trial preparation materials, the claim shall be made
9 expressly and shall be supported by a description of the nature of the documents,
communications, or things not produced that is sufficient to enable the demanding party to
contest the claim.

10
11 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
12 that person may be deemed a contempt of the court from which the subpoena issued.
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EXHIBIT “6”

EXHIBIT “6”

EXHIBIT “6”

1 **NOTC**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 EMILY BELLISARIO,
12 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

13 vs.

NOTICE OF SUBPOENA DUCES TECUM

14 BRADLEY BELLISARIO,
15 Defendant

16 PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena
17 will be served upon Johnson Martin Advisors, 27 Midnight Ridge Avenue, Las Vegas, Nevada
18 89135, if you have not objected and sought issuance of a protective order. A copy of the proposed
19 Subpoena is attached hereto and fully incorporated herein by reference.

20 DATED this 24th day of April 2021.

21 BY: /s/ Bradley Bellisario
22 Bradley Bellisario
23 *Plaintiff Pro Se*
24 7100 Grand Montecito Pkwy, #2054
25 Las Vegas, NV 89149
26 T: 309.397.6734
27 E: bradb@bellisariolaw.com

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NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0664

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CERTIFICATE OF SERVICE

I hereby certify that I am the Defendant in the above-entitled matter, and on the 24th day of April 2021, I served by and through Wiz-Net electronic service, pursuant to Clark County District Court Administrative Order 14-2 for service of documents identified in Rule 9 of the N.E.F.C.R., the foregoing NOTICE OF SUBPOENA DUCES TECUM, to the following:

Amanda Roberts
ROBERTS STOFFEL FAMILY LAW GROUP
4411 S. Pecos Road
Las Vegas, NV 89121
Email: efile@lvfamilylaw.com
Attorney for Plaintiff, Emily Bellisario

/s/ Bradley Bellisario
Bradley Bellisario, *Defendant Pro Se*

1 **SUBP**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 EMILY BELLISARIO,
12
13 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

14 vs.

SUBPOENA DUCES TECUM

15 BRADLEY BELLISARIO,
16
17 Defendant

18 **THE STATE OF NEVADA SENDS GREETINGS TO:**

19 **Custodian of Records**
20 **Johnson Martin Advisors, Inc.**
21 **27 Midnight Ridge Avenue**
22 **Las Vegas, Nevada 89135**

23 YOU ARE HEREBY COMMANDED that all and singular business and excuses set
24 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
25 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
26 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
27 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
28 Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
your attendance is not required.

SUBPOENA DUCES TECUM - 1

PLTF0666

AA2684

The relevant rules governing Subpoenas and Subpoena compliance are set forth in the Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit “B.”** If you fail to appear or produce the requested documents, you will be deemed guilty of contempt of Court and liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE HUNDRED DOLLARS (\$100.00).

Steven D. Grierson, CLERK OF COURT

By: _____
Deputy Clerk

Date:

Submitted by: /s/ Bradley Bellisario
Bradley Bellisario
Plaintiff Pro Se
7100 Grand Montecito Pkwy, #2054
Las Vegas, NV 89149
T: 309.397.6734
E: bradb@bellisariolaw.com

SUBPOENA DUCES TECUM - 2

PLTF0667

AA2685

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EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by

SUBPOENA DUCES TECUM - 4

PLTF0669

AA2687

1 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
2 issued shows a substantial need for the testimony or material that cannot be otherwise met
3 without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

4 **(d) Duties in responding to subpoena.**

5 (1) A person responding to a subpoena to produce documents shall produce them as
6 they are kept in the usual course of business or shall organize and label them to correspond with
the categories in the demand.

7 (2) When information subject to a subpoena is withheld on a claim that it is
8 privileged or subject to protection as trial preparation materials, the claim shall be made
9 expressly and shall be supported by a description of the nature of the documents,
communications, or things not produced that is sufficient to enable the demanding party to
contest the claim.

10
11 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
12 that person may be deemed a contempt of the court from which the subpoena issued.
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EXHIBIT “7”

EXHIBIT “7”

EXHIBIT “7”

1 **NOTC**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

6 DISTRICT COURT
7
8 CLARK COUNTY, NEVADA

9 EMILY BELLISARIO,
10
11 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

11 vs.

NOTICE OF SUBPOENA DUCES TECUM

12 BRADLEY BELLISARIO,
13
14 Defendant

15 PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena
16 will be served upon JP Morgan Chase Bank, N.A., 2865 E. Charleston Blvd., Las Vegas, Nevada
17 89104, if you have not objected and sought issuance of a protective order. A copy of the proposed
18 Subpoena is attached hereto and fully incorporated herein by reference.
19

20 DATED this 24th day of April 2021.

21 BY: /s/ Bradley Bellisario
22 Bradley Bellisario
23 *Plaintiff Pro Se*
24 7100 Grand Montecito Pkwy, #2054
25 Las Vegas, NV 89149
26 T: 309.397.6734
27 E: bradb@bellisariolaw.com

26 ///

27 ///

28 NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0671

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Amanda Roberts
ROBERTS STOFFEL FAMILY LAW GROUP
4411 S. Pecos Road
Las Vegas, NV 89121
Email: efile@lvfamilylaw.com
Attorney for Plaintiff, Emily Bellisario

/s/ Bradley Bellisario
Bradley Bellisario, *Defendant Pro Se*

1 **SUBP**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 EMILY BELLISARIO,
12
13 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

14 vs.

SUBPOENA DUCES TECUM

15 BRADLEY BELLISARIO,
16
17 Defendant

18 **THE STATE OF NEVADA SENDS GREETINGS TO:**

19 **Custodian of Records**
20 **JP Morgan Chase Bank, N.A.**
21 **Attn: Subpoena Compliance Department**
22 **2865 E. Charleston Blvd.**
23 **Las Vegas, Nevada 89104**

24 YOU ARE HEREBY COMMANDED that all and singular business and excuses set
25 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
26 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
27 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
28 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
your attendance is not required.

SUBPOENA DUCES TECUM - 1

PLTF0673

1 The relevant rules governing Subpoenas and Subpoena compliance are set forth in the
2 Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit "B."** If you fail to
3 appear or produce the requested documents, you will be deemed guilty of contempt of Court and
4 liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE
5 HUNDRED DOLLARS (\$100.00).
6

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8 Steven D. Grierson, CLERK OF COURT
9

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11 By: _____
12 Deputy Clerk

13 Date:
14
15

16
17 Submitted by: /s/ Bradley Bellisario
18 Bradley Bellisario
19 *Plaintiff Pro Se*
20 7100 Grand Montecito Pkwy, #2054
21 Las Vegas, NV 89149
22 T: 309.397.6734
23 E: bradb@bellisariolaw.com
24
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SUBPOENA DUCES TECUM - 2

PLTF0674

AA2693

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EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waive applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by

SUBPOENA DUCES TECUM - 4

PLTF0676

AA2695

1 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
2 issued shows a substantial need for the testimony or material that cannot be otherwise met
3 without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

4 **(d) *Duties in responding to subpoena.***

5 (1) A person responding to a subpoena to produce documents shall produce them as
6 they are kept in the usual course of business or shall organize and label them to correspond with
the categories in the demand.

7 (2) When information subject to a subpoena is withheld on a claim that it is
8 privileged or subject to protection as trial preparation materials, the claim shall be made
9 expressly and shall be supported by a description of the nature of the documents,
communications, or things not produced that is sufficient to enable the demanding party to
contest the claim.

10
11 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
12 that person may be deemed a contempt of the court from which the subpoena issued.

EXHIBIT “8”

EXHIBIT “8”

EXHIBIT “8”

1 **NOTC**

2 **BRADLEY J. BELLISARIO**
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 **EMILY BELLISARIO,**
12 **Plaintiff,**

13 **vs.**

14 **BRADLEY BELLISARIO,**
15 **Defendant**

Case No.: D-20-605263-D
Dept No.: P

NOTICE OF SUBPOENA DUCES TECUM

16 PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena
17 will be served upon Las Vegas Metropolitan Police Department, 400 South Martin Luther King
18 Blvd. Bldg. C, Las Vegas, Nevada 89106, if you have not objected and sought issuance of a
19 protective order. A copy of the proposed Subpoena is attached hereto and fully incorporated herein
20 by reference.

21 DATED this 24th day of April 2021.

22 BY: /s/ Bradley Bellisario
23 Bradley Bellisario
24 *Plaintiff Pro Se*
25 7100 Grand Montecito Pkwy, #2054
26 Las Vegas, NV 89149
27 T: 309.397.6734
28 E: bradb@bellisariolaw.com

///

NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0678

1 ///

2 **CERTIFICATE OF SERVICE**

3 I hereby certify that I am the Defendant in the above-entitled matter, and on the 24th day of
4 April 2021, I served by and through Wiz-Net electronic service, pursuant to Clark County District
5 Court Administrative Order 14-2 for service of documents identified in Rule 9 of the N.E.F.C.R.
6 the foregoing NOTICE OF SUBPOENA DUCES TECUM, to the following:
7

8
9 Amanda Roberts
10 ROBERTS STOFFEL FAMILY LAW GROUP
11 4411 S. Pecos Road
12 Las Vegas, NV 89121
13 Email: efile@lvfamilylaw.com
14 *Attorney for Plaintiff, Emily Bellisario*

15 /s/ Bradley Bellisario
16 Bradley Bellisario, *Defendant Pro Se*
17
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NOTICE OF SUBPOENA DUCES TECUM - 2

PLTF0679

AA2699

1 **SUBP**

2 **BRADLEY J. BELLISARIO**

3 7100 Grand Montecito Pkwy, #2054

4 Las Vegas, NV 89149

5 T: (702) 936-4800

6 F: (702) 936-4801

7 E: BradB@BellisarioLaw.com

8 *Defendant Pro Se*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 **EMILY BELLISARIO,**

12 Plaintiff,

13 vs.

14 **BRADLEY BELLISARIO,**

15 Defendant

Case No.: D-20-605263-D

Dept No.: P

SUBPOENA DUCES TECUM

16 **THE STATE OF NEVADA SENDS GREETINGS TO:**

17 **Custodian of Records**

18 **Las Vegas Metropolitan Police Department**

19 **Attn: Correspondence Department**

20 **400 South Martin Luther King Blvd. Bldg C**

21 **Las Vegas, Nevada 89106**

22 YOU ARE HEREBY COMMANDED that all and singular business and excuses set
23 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
24 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
25 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
26 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
27 Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
28 your attendance is not required.

SUBPOENA DUCES TECUM - 1

PLTF0680

AA2700

1 The relevant rules governing Subpoenas and Subpoena compliance are set forth in the
2 Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit "B."** If you fail to
3 appear or produce the requested documents, you will be deemed guilty of contempt of Court and
4 liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE
5 HUNDRED DOLLARS (\$100.00).
6

7
8 Steven D. Grierson, CLERK OF COURT
9

10
11 By: _____
12 Deputy Clerk

13 Date:
14
15

16
17 Submitted by: /s/ Bradley Bellisario
18 Bradley Bellisario
19 *Plaintiff Pro Se*
20 7100 Grand Montecito Pkwy, #2054
21 Las Vegas, NV 89149
22 T: 309.397.6734
23 E: bradb@bellisariolaw.com
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SUBPOENA DUCES TECUM - 2

PLTF0681

AA2701

EXHIBIT "A"
LIST OF DOCUMENTS TO BE PRODUCED

1. Any and all records on file with the Las Vegas Metropolitan Police Department related to Emily Bellisario (Date of Birth: 7/24/1988; SSN 530-63-1546); including but not limited to complaints, report, full investigative report, officer notes, detective notes, audio recordings, transcripts and/or written records from August 16, 2014 through the present date.

2. Any and all records on file with the Las Vegas Metropolitan Police Department related to Emily Cardona (Date of Birth: 7/24/1988; SSN 530-63-1546); including but not limited to complaints, report, full investigative report, officer notes, detective notes, audio recordings, transcripts and/or written records from August 16, 2014 through the present date.

EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by

SUBPOENA DUCES TECUM - 4

PLTF0683

AA2703

1 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
2 issued shows a substantial need for the testimony or material that cannot be otherwise met
3 without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

4 **(d) *Duties in responding to subpoena.***

5 (1) A person responding to a subpoena to produce documents shall produce them as
6 they are kept in the usual course of business or shall organize and label them to correspond with
the categories in the demand.

7 (2) When information subject to a subpoena is withheld on a claim that it is
8 privileged or subject to protection as trial preparation materials, the claim shall be made
9 expressly and shall be supported by a description of the nature of the documents,
communications, or things not produced that is sufficient to enable the demanding party to
contest the claim.

10
11 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
12 that person may be deemed a contempt of the court from which the subpoena issued.

EXHIBIT “9”

EXHIBIT “9”

EXHIBIT “9”

1 **NOTC**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 EMILY BELLISARIO,
12 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

13 vs.

NOTICE OF SUBPOENA DUCES TECUM

14 BRADLEY BELLISARIO,
15 Defendant

16 PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena
17 will be served upon Nevada State Bank, 112 North Curry Street, Carson City, Nevada 89703, if
18 you have not objected and sought issuance of a protective order. A copy of the proposed Subpoena
19 is attached hereto and fully incorporated herein by reference.

20 DATED this 24th day of April 2021.

21 BY: /s/ Bradley Bellisario
22 Bradley Bellisario
23 *Plaintiff Pro Se*
24 7100 Grand Montecito Pkwy, #2054
25 Las Vegas, NV 89149
26 T: 309.397.6734
27 E: bradb@bellisariolaw.com

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NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0685

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Amanda Roberts
ROBERTS STOFFEL FAMILY LAW GROUP
4411 S. Pecos Road
Las Vegas, NV 89121
Email: efile@lvfamilylaw.com
Attorney for Plaintiff, Emily Bellisario

NOTICE OF SUBPOENA DUCES TECUM - 2

AA2707

1 **SUBP**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

6 DISTRICT COURT

7 CLARK COUNTY, NEVADA

9 EMILY BELLISARIO,
10 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

11 vs.

SUBPOENA DUCES TECUM

12 BRADLEY BELLISARIO,
13 Defendant

14 **THE STATE OF NEVADA SENDS GREETINGS TO:**

15
16 **Custodian of Records**
17 **Nevada State Bank**
18 **Attn: Subpoena Compliance Department**
19 **112 North Curry Street**
20 **Carson City, Nevada 89703**

21 YOU ARE HEREBY COMMANDED that all and singular business and excuses set
22 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
23 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
24 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
25 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
26 Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
27 your attendance is not required.

28 SUBPOENA DUCES TECUM - 1

PLTF0687

1 The relevant rules governing Subpoenas and Subpoena compliance are set forth in the
2 Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit "B."** If you fail to
3 appear or produce the requested documents, you will be deemed guilty of contempt of Court and
4 liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE
5 HUNDRED DOLLARS (\$100.00).
6

7
8 Steven D. Grierson, CLERK OF COURT
9

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11 By: _____
12 Deputy Clerk

13 Date:
14
15

16
17 Submitted by: /s/ Bradley Bellisario
18 Bradley Bellisario
19 *Plaintiff Pro Se*
20 7100 Grand Montecito Pkwy, #2054
21 Las Vegas, NV 89149
22 T: 309.397.6734
23 E: bradb@bellisariolaw.com
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SUBPOENA DUCES TECUM - 2

PLTF0688

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EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by

SUBPOENA DUCES TECUM - 4

PLTF0690

AA2711

1 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
2 issued shows a substantial need for the testimony or material that cannot be otherwise met
3 without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

4 **(d) Duties in responding to subpoena.**

5 (1) A person responding to a subpoena to produce documents shall produce them as
6 they are kept in the usual course of business or shall organize and label them to correspond with
the categories in the demand.

7 (2) When information subject to a subpoena is withheld on a claim that it is
8 privileged or subject to protection as trial preparation materials, the claim shall be made
9 expressly and shall be supported by a description of the nature of the documents,
communications, or things not produced that is sufficient to enable the demanding party to
contest the claim.

10
11 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
12 that person may be deemed a contempt of the court from which the subpoena issued.

EXHIBIT “10”

EXHIBIT “10”

EXHIBIT “10”

1 **NOTC**

2 **BRADLEY J. BELLISARIO**
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 **EMILY BELLISARIO,**
12 **Plaintiff,**

Case No.: D-20-605263-D
Dept No.: P

13 **vs.**

NOTICE OF SUBPOENA DUCES TECUM

14 **BRADLEY BELLISARIO,**
15 **Defendant**

16 PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena
17 will be served upon Wells Fargo, 3800 Howard Hughes Parkway, Las Vegas, Nevada 89169, if
18 you have not objected and sought issuance of a protective order. A copy of the proposed Subpoena
19 is attached hereto and fully incorporated herein by reference.

20 DATED this 24th day of April 2021.

21 BY: /s/ Bradley Bellisario
22 Bradley Bellisario
23 *Plaintiff Pro Se*
24 7100 Grand Montecito Pkwy, #2054
25 Las Vegas, NV 89149
26 T: 309.397.6734
27 E: bradb@bellisariolaw.com

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NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0692

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Amanda Roberts
ROBERTS STOFFEL FAMILY LAW GROUP
4411 S. Pecos Road
Las Vegas, NV 89121
Email: efile@lvfamilylaw.com
Attorney for Plaintiff, Emily Bellisario

/s/ Bradley Bellisario
Bradley Bellisario, *Defendant Pro Se*

1 **SUBP**

2 **BRADLEY J. BELLISARIO**
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 **EMILY BELLISARIO,**

12 **Plaintiff,**

13 **vs.**

14 **BRADLEY BELLISARIO,**

15 **Defendant**

Case No.: D-20-605263-D

Dept No.: P

SUBPOENA DUCES TECUM

16 **THE STATE OF NEVADA SENDS GREETINGS TO:**

17 **Custodian of Records**
18 **Wells Fargo Bank, N.A.**
19 **Attn: Subpoena Compliance Department**
20 **3800 Howard Hughes Parkway**
21 **Las Vegas, Nevada 89169**

22 **YOU ARE HEREBY COMMANDED** that all and singular business and excuses set
23 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
24 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
25 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
26 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
27 Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
28 your attendance is not required.

SUBPOENA DUCES TECUM - 1

PLTF0694

AA2716

1 The relevant rules governing Subpoenas and Subpoena compliance are set forth in the
2 Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit "B."** If you fail to
3 appear or produce the requested documents, you will be deemed guilty of content of Court and
4 liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE
5 HUNDRED DOLLARS (\$100.00).
6

7
8 Steven D. Grierson, CLERK OF COURT
9

10
11 By: _____
12 Deputy Clerk

13 Date:
14
15

16
17 Submitted by: /s/ Bradley Bellisario
18 Bradley Bellisario
19 *Plaintiff Pro Se*
20 7100 Grand Montecito Pkwy, #2054
21 Las Vegas, NV 89149
22 T: 309.397.6734
23 E: bradb@bellisariolaw.com
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SUBPOENA DUCES TECUM - 2

PLTF0695

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EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by

SUBPOENA DUCES TECUM - 4

PLTF0697

AA2719

1 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
2 issued shows a substantial need for the testimony or material that cannot be otherwise met
3 without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

4 **(d) *Duties in responding to subpoena.***

5 (1) A person responding to a subpoena to produce documents shall produce them as
6 they are kept in the usual course of business or shall organize and label them to correspond with
the categories in the demand.

7 (2) When information subject to a subpoena is withheld on a claim that it is
8 privileged or subject to protection as trial preparation materials, the claim shall be made
9 expressly and shall be supported by a description of the nature of the documents,
communications, or things not produced that is sufficient to enable the demanding party to
contest the claim.

10
11 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
12 that person may be deemed a contempt of the court from which the subpoena issued.
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EXHIBIT “11”

EXHIBIT “11”

EXHIBIT “11”

1 **NOTC**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 EMILY BELLISARIO,
12 Plaintiff,

Case No.: D-20-605263-D
Dept No.: P

13 vs.

NOTICE OF SUBPOENA DUCES TECUM

14 BRADLEY BELLISARIO,
15 Defendant

16 PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena
17 will be served upon The State Bar of Nevada, 3100 W. Charleston Blvd., Las Vegas, Nevada
18 89102, if you have not objected and sought issuance of a protective order. A copy of the proposed
19 Subpoena is attached hereto and fully incorporated herein by reference.

20 DATED this 26th day of April 2021.

21 BY: /s/ Bradley Bellisario
22 Bradley Bellisario
23 *Plaintiff Pro Se*
24 7100 Grand Montecito Pkwy, #2054
25 Las Vegas, NV 89149
26 T: 309.397.6734
27 E: bradb@bellisariolaw.com

28 ///

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NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0699

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Amanda Roberts
ROBERTS STOFFEL FAMILY LAW GROUP
4411 S. Pecos Road
Las Vegas, NV 89121
Email: efile@lvfamilylaw.com
Attorney for Plaintiff, Emily Bellisario

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1 **SUBP**

2 **BRADLEY J. BELLISARIO**

3 7100 Grand Montecito Pkwy, #2054

4 Las Vegas, NV 89149

5 T: (702) 936-4800

6 F: (702) 936-4801

7 E: BradB@BellisarioLaw.com

8 *Defendant Pro Se*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 **EMILY BELLISARIO,**

12 **Plaintiff,**

13 **vs.**

14 **BRADLEY BELLISARIO,**

15 **Defendant**

Case No.: D-20-605263-D

Dept No.: P

SUBPOENA DUCES TECUM

16 **THE STATE OF NEVADA SENDS GREETINGS TO:**

17 **Custodian of Records**

18 **State Bar of Nevada**

19 **Attn: Subpoena Compliance Department**

20 **3100 W. Charleston Blvd.**

21 **Las Vegas, Nevada 89102**

22 YOU ARE HEREBY COMMANDED that all and singular business and excuses set
23 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
24 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
25 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
26 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
27 Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
28 your attendance is not required.

SUBPOENA DUCES TECUM - 1

PLTF0701

AA2724

1 The relevant rules governing Subpoenas and Subpoena compliance are set forth in the
2 Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit "B."** If you fail to
3 appear or produce the requested documents, you will be deemed guilty of content of Court and
4 liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE
5 HUNDRED DOLLARS (\$100.00).
6

7
8 Steven D. Grierson, CLERK OF COURT
9

10
11 By: _____
12 Deputy Clerk

13 Date:
14
15

16
17 Submitted by: /s/ Bradley Bellisario
18 Bradley Bellisario
19 *Plaintiff Pro Se*
20 7100 Grand Montecito Pkwy, #2054
21 Las Vegas, NV 89149
22 T: 309.397.6734
23 E: bradb@bellisariolaw.com
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SUBPOENA DUCES TECUM - 2

PLTF0702

AA2725

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a. Amanda Roberts' complete file, to include all employment records, all complaints, all investigations regarding complaints, all correspondence from Amanda Roberts regarding filed complaints, and all disciplinary action.

EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by

SUBPOENA DUCES TECUM - 4

PLTF0704

AA2727

1 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
2 issued shows a substantial need for the testimony or material that cannot be otherwise met
3 without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

4 **(d) *Duties in responding to subpoena.***

5 (1) A person responding to a subpoena to produce documents shall produce them as
6 they are kept in the usual course of business or shall organize and label them to correspond with
the categories in the demand.

7 (2) When information subject to a subpoena is withheld on a claim that it is
8 privileged or subject to protection as trial preparation materials, the claim shall be made
9 expressly and shall be supported by a description of the nature of the documents,
communications, or things not produced that is sufficient to enable the demanding party to
contest the claim.

10
11 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
12 that person may be deemed a contempt of the court from which the subpoena issued.

EXHIBIT “12”

EXHIBIT “12”

EXHIBIT “12”

1 **NOTC**

2 BRADLEY J. BELLISARIO
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 EMILY BELLISARIO,
12 Plaintiff,

13 vs.

14 BRADLEY BELLISARIO,
15 Defendant

Case No.: D-20-605263-D
Dept No.: P

NOTICE OF SUBPOENA DUCES TECUM

16 PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena
17 will be served upon The State of Nevada Board of Examiners for Marriage & Family Therapists
18 & Clinical Professional Counselors, 7324 W. Cheyenne Suite #10., Las Vegas, Nevada 89129, if
19 you have not objected and sought issuance of a protective order. A copy of the proposed Subpoena
20 is attached hereto and fully incorporated herein by reference.

21 DATED this 26th day of April 2021.

22 BY: /s/ Bradley Bellisario
23 Bradley Bellisario
24 *Plaintiff Pro Se*
25 7100 Grand Montecito Pkwy, #2054
26 Las Vegas, NV 89149
27 T: 309.397.6734
28 E: bradb@bellisariolaw.com

///

NOTICE OF SUBPOENA DUCES TECUM - 1

PLTF0706

1 ///

2 **CERTIFICATE OF SERVICE**

3 I hereby certify that I am the Defendant in the above-entitled matter, and on the 26th day of
4 April 2021, I served by and through Wiz-Net electronic service, pursuant to Clark County District
5 Court Administrative Order 14-2 for service of documents identified in Rule 9 of the N.E.F.C.R.
6 the foregoing NOTICE OF SUBPOENA DUCES TECUM, to the following:
7

8
9 Amanda Roberts
10 ROBERTS STOFFEL FAMILY LAW GROUP
11 4411 S. Pecos Road
12 Las Vegas, NV 89121
13 Email: efile@lvfamilylaw.com
14 *Attorney for Plaintiff, Emily Bellisario*

15 /s/ Bradley Bellisario
16 Bradley Bellisario, *Defendant Pro Se*
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NOTICE OF SUBPOENA DUCES TECUM - 2

PLTF0707

AA2731

1 **SUBP**

2 **BRADLEY J. BELLISARIO**
3 7100 Grand Montecito Pkwy, #2054
4 Las Vegas, NV 89149
5 T: (702) 936-4800
6 F: (702) 936-4801
7 E: BradB@BellisarioLaw.com
8 *Defendant Pro Se*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 **EMILY BELLISARIO,**
12 **Plaintiff,**

Case No.: D-20-605263-D
Dept No.: P

13 **vs.**

SUBPOENA DUCES TECUM

14 **BRADLEY BELLISARIO,**
15 **Defendant**

16 **THE STATE OF NEVADA SENDS GREETINGS TO:**

17 **Custodian of Records**
18 **State of Nevada Board of Examiners For Marriage & Family Therapists &**
19 **Clinical Professional Counselors**
20 **Attn: Subpoena Compliance Department**
21 **7324 W. Cheyenne Suite #10**
22 **Las Vegas, Nevada 89129**

23 **YOU ARE HEREBY COMMANDED** that all and singular business and excuses set
24 aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on
25 the 21st day of May 2021, at the hour of 12:00 p.m., at the Defendant's residence, located at 7100
26 Grand Montecito Pkwy #2054, Las Vegas, NV 89149. In the event the requested documents are
27 produced on or before the 21st day of May 2021, together with an Affidavit of the Custodian of
28 Records (please contact Defendant at bradb@bellisariolaw.com if an Affidavit is needed) then
your attendance is not required.

SUBPOENA DUCES TECUM - 1

PLTF0708

AA2732

1 The relevant rules governing Subpoenas and Subpoena compliance are set forth in the
2 Nevada Rules of Civil Procedure § 45 which are attached hereto as **Exhibit "B."** If you fail to
3 appear or produce the requested documents, you will be deemed guilty of content of Court and
4 liable to pay all losses and damages caused by your failure and in addition the forfeiture of ONE
5 HUNDRED DOLLARS (\$100.00).
6

7
8 Steven D. Grierson, CLERK OF COURT
9

10
11 By: _____
12 Deputy Clerk

13 Date:
14
15

16
17 Submitted by: /s/ Bradley Bellisario
18 Bradley Bellisario
19 *Plaintiff Pro Se*
20 7100 Grand Montecito Pkwy, #2054
21 Las Vegas, NV 89149
22 T: 309.397.6734
23 E: bradb@bellisariolaw.com
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SUBPOENA DUCES TECUM - 2

PLTF0709

AA2733

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a. Donna Wilburn's complete file, to include all employment records, all complaints, all investigations regarding complaints, all correspondence from Donna Wilburn regarding filed complaints, all disciplinary action, all applications for licensure, and all applications for renewal of licensure.

EXHIBIT "B"
NEVADA RULES OF CIVIL PROCEDURE

Rule 45

(c) *Protection of persons subject to subpoena.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

1 (i) requires disclosure of a trade secret or other confidential research,
2 development, or commercial information, or

3 (ii) requires disclosure of an unretained expert's opinion or information
4 not describing specific events or occurrences in dispute and resulting from the expert's study
5 made not at the request of any party, the court may, to protect a person subject to or affected by
6 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
7 issued shows a substantial need for the testimony or material that cannot be otherwise met
8 without undue hardship and assures that the person to whom the subpoena is addressed will be
9 reasonably compensated, the court may order appearance or production only upon specified
10 conditions.

11 **(d) Duties in responding to subpoena.**

12 (1) A person responding to a subpoena to produce documents shall produce them as
13 they are kept in the usual course of business or shall organize and label them to correspond with
14 the categories in the demand.

15 (2) When information subject to a subpoena is withheld on a claim that it is
16 privileged or subject to protection as trial preparation materials, the claim shall be made
17 expressly and shall be supported by a description of the nature of the documents,
18 communications, or things not produced that is sufficient to enable the demanding party to
19 contest the claim.

20 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon
21 that person may be deemed a contempt of the court from which the subpoena issued.

EXHIBIT “13”

EXHIBIT “13”

EXHIBIT “13”

1 **RFPD**
2 **BRADLEY J. BELLISARIO**
3 Nevada Bar No. 13452
4 7100 Grand Montecito Pkwy, #2054
5 Las Vegas, NV 89149
6 T: (702) 936-4800
7 F: (702) 936-4801
8 E: BradB@BellisarioLaw.com
9 *Defendant Pro Se*

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

9 **EMILY BELLISARIO,**
10 **Plaintiff,**

Case No.: D-20-605263-D
Dept No.: P

11 vs.

12 **BRADLEY BELLISARIO,**
13 **Defendant**

**DEFENDANT'S FIRST SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO PLAINTIFF**

15
16 **TO:** Plaintiff, Emily Bellisario, by and through her counsel of record, Amanda Roberts, Esq.
17 of Roberts Stoffel Law Group.

18
19
20 Pursuant to Rule 34 of the Nevada Rule of Civil Procedure, the Defendant, Bradley
21 Bellisario, *in proper person*, hereby requests Plaintiff, Emily Bellisario respond to Defendant's
22 First Set of Requests for Production of Documents to Plaintiff. Pursuant to said rule, the Plaintiff
23 is required to respond to Defendant's First Set of Requests for Production of Documents to
24 Plaintiff within thirty (30) days of service of the request.

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28 **DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF - 1**

PLTF0713

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1 (e) The words "possession, custody, or control" mean all documents and things
2 belonging to you that are in your possession, all documents and things belonging to others which
3 you have custody, and all documents and things in the custody of others over which you have the
4 right to control.
5

6 (f) If you at any time had possession of control of a document called for under this
7 Request and if such document has been lost, destroyed, purged, or is not presently in your
8 possession or control, you shall describe the document, the date of its loss, destruction, purge, or
9 separation from possession or control, and the circumstances surrounding its loss, destruction,
10 purge, or separation from possession or control.
11

12 (g) If any document requested is not within your personal custody or control, so state.
13 If the document is not in your personal control or custody, identify every person or entity you
14 know or believe has custody or control of such document.
15

16 (h) As used in this Request, the term "person" includes, without limiting the generality
17 of its meaning, every natural person, corporate entity, partnership, association, governmental
18 body or agency.

19 (i) As used in this Request, the terms "identification of a person or entity" includes
20 stating his, her or its full name, his or her most recent home address and telephone number, his,
21 her or its most recent known business address and telephone number, his or her present position,
22 and his, her or its prior connection or association with any party to this litigation.
23

24 (j) If you cannot produce any document requested, after exercising diligence to secure
25 the document or photograph, so state and answer to the extent possible, specifying your inability
26 to produce and stating whatever information or knowledge you have concerning the document or
27 photograph you are unable to produce.
28

DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF - 3

PLTF0715

1 (k) If you claim privilege claimed, the communication and/or answer as to which that
2 claim is made, the parties to the communication, the topic discussed in the communication and
3 the basis for your claim.
4

5 (l) These Requests are continuing and require supplemental answers if you obtain
6 further information with respect to the same between the date your answers are served and the
7 entry of judgement.

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28 DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF - 4

PLTF0716

AA2741

1 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1:**

2 For each line item on your Financial Disclosure Form, if not already evidenced by the
3 other initial disclosures required herein, please provide the financial statement(s), document(s),
4 receipt(s), or other information or evidence relied upon to support the figures represented by you
5 on your Financial Disclosure Form.
6

7 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2:**

8 Please provide copies of all video you or someone at your direction has made of Bradley
9 Bellisario since August 16, 2014.
10

11 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 3:**

12 Please provide copies of all pictures you or someone at your direction has made of Bradley
13 Bellisario since August 16, 2014.
14

15 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4:**

16 Please provide copies of all video you or someone at your direction has made of Brayden
17 Bellisario since August 1, 2019.
18

19 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 5:**

20 Please provide copies of all pictures you or someone at your direction has made of
21 Brayden Bellisario since August 1, 2019.
22

23 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6:**

24 Please provide copies of all video you or someone at your direction has made of Blake
25 Bellisario since August 1, 2019.
26

27 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 7:**

28 Please provide copies of all pictures you or someone at your direction has made of Blake
Bellisario since August 1, 2019.

DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF - 5

PLTF0717

1 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 8:**

2 Please provide copies of all video you or someone at your direction has made of Brooklyn
3 Bellisario since August 1, 2019.

4 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 9:**

5 Please provide copies of all pictures you or someone at your direction has made of
6 Brooklyn Bellisario since August 1, 2019.

7 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 10:**

8 Please provide copies of all security camera video of the marital residence located 1913
9 Sondrio Drive, Las Vegas, Nevada 89134 since August 1, 2019.

10 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 11:**

11 Please provide copies of all security cameral pictures of the marital residence located at
12 1913 Sondrio Drive, Las Vegas, Nevada 89134 since August 1, 2019.

13 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 12:**

14 Please provide copies of all bank account statements for your accounts located at Bank of
15 Nevada, Nevada State Bank, Bank of America, and Wells Fargo since August 116, 2014.

16 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 13:**

17 Please provide copies of all credit card statements for all of your credit card accounts since
18 August 16, 2014.

19 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 14:**

20 For each line item on your Financial Disclosure Form, if not already evidenced by the
21 other initial disclosures required herein, related to your alleged personal expenses, please provide
22 proof of same from January 1, 2019.

23 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 15:**

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DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF - 6

PLTF0718

1 Please provide copies of all policy statements and evidence of costs of premiums for health
2 and life insurance policies covering either party and/or any children of this marriage paid by you
3 from August 16, 2014 to present.

4
5 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 16:**

6 Please provide a copy of every other document or exhibit, including summaries of other
7 evidence, that a party expects to offer as evidence at Trial in any matter, including but not limited
8 to all Clark County District Court and Las Vegas Justice Court cases which you have knowledge
9 of.

10
11 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 17:**

12 Please execute and return a general HIPPA release for all medical providers who provided
13 medical health services for Emily Bellisario a.k.a. Emily Cardona from August 16, 2014 to
14 present.

15
16 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 18:**

17 Please provide a copy of every receipt for every line item on your disclosed bank
18 statements.

19
20 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 19:**

21 Please provide a copy of all documents and communications from January 1, 2019 to
22 present between Emily Bellisario and Donna Wilburn including but not limited to texts, emails,
23 letters, etc.

24
25 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 20:**

26 Please provide a copy of all documents and communications from January 1, 2019 to
27 present between Amanda Roberts, any agent of the Roberts Stoffel Law Group and Donna
28 Wilburn including but not limited to texts, emails, letters, etc.

DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF - 7

PLTF0719

1 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 21:**

2 Please provide a copy of all documents and communications between Emily Bellisario
3 and Kendra Bott from January 1, 2019 to present.
4

5 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 22:**

6 Please provide a copy of all documents and communications between Emily Bellisario
7 and Saira McKinley from August 1, 2019 to present.
8

9 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 23:**

10 Please provide a copy of all documents and communications between Emily Bellisario
11 and Javier Cardona from August 1, 2019 to present.
12

13 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 24:**

14 Please provide a copy of all documents and communications between Emily Bellisario
15 and Mario Markos from January 1, 2019 to present.
16

17 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 25:**

18 Please provide a copy of all documents and communications between Emily Bellisario
19 and Anna Trujillo from January 1, 2019 to present.
20

21 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 26:**

22 Please provide a copy of all documents and communications between Emily Bellisario
23 and FirstMed Health and Wellness Center from September 17, 2019 to present.
24

25 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 27:**

26 Please provide a copy of all documents and communications between Emily Bellisario
27 and All About You Counseling from September 1, 2019 to present.
28

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 28:

1 Please provide a copy of all documents and communications between Emily Bellisario
2 and Bethany Andis from September 17, 2019 to present.

3 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 29:**
4

5 Please provide a copy of all police reports filed by Emily Bellisario with any law
6 enforcement agency in the State of Nevada from August 16, 2014 to present.

7 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 30:**
8

9 Please provide a copy of all documents and communications between Emily Bellisario
10 and any law enforcement agency in the State of Nevada from August 1, 2019 to present.

11 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 31:**
12

13 Please provide a copy of all documents and communications between Emily Bellisario
14 and Boris Avramski from January 1, 2019 to present.

15 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 32:**
16

17 Please provide a copy of all documents and communications between Emily Bellisario
18 and Joseph Riccio from January 1, 2019 to present.

19 **REQUEST FOR PRODUCTION OF DOCUMENTS NO.33:**
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21 Please provide a copy of all documents and communications between Emily Bellisario
22 and Nicolas Ponzo from January 1, 2020 to present.

23 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 34:**
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25 Please provide a copy of all documents and communications between Emily Bellisario
26 and any healthcare provider who provided abortion services for Emily Bellisario from January 1,
27 2019 to January 1, 2020.

28 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 35:**

1 Please provide a copy of all documents and communications relating to insurance claims
2 on the martial residence located at 1913 Sondrio Drive, Las Vegas, Nevada 89134 from January
3 1, 2018 to present.

4
5 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 36:**

6 Please provide a copy of all medical records in your possession for Brayden Bellisario
7 from January 15, 2015 to present.

8 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 37:**

9 Please provide a copy of all medical records in your possession for Blake Bellisario from
10 November 20, 2016 to present.

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12 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 38:**

13 Please provide a copy of all medical records in your possession for Brooklyn Bellisario
14 from February 1, 2018 to present.

15 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 39:**

16 Please provide a copy of all receipts for medical expenses for Brayden Bellisario from
17 January 15, 2015 to present.

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19 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 40:**

20 Please provide a copy of all receipts for medical expenses for Blake Bellisario from
21 November 20, 2016 to present.

22 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 41:**

23 Please provide a copy of all receipts for medical expenses for Brooklyn Bellisario from
24 February 1, 2018 to present.

25 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 42:**

1 Please provide a copy of all paystubs received from Allied Flooring Services from August
2 16, 2014 to present.

3 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 43:**

4 Please provide a copy of all payments made to Marathon Law Group, or any attorney
5 working for Marathon Law Group, from January 1, 2019 to present.

6 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 44:**

7 Please provide a copy of all retainer agreements with Marathon Law Group, or any
8 attorney working for Marathon Law Group, from January 1, 2019 to present.

9 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 45:**

10 Please provide a copy of all retainer agreements with Roberts Stoffel Law Group, or any
11 attorney working for Roberts Stoffel Law Group, from January 1, 2019 to present.

12 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 46:**

13 Please provide a copy of all payments made to Roberts Stoffel Law Group, or any attorney
14 working for Roberts Stoffel Law Group, from January 1, 2019 to present.

15 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 47:**

16 Please provide a copy of all documents related to assets acquired prior to the parties'
17 marriage on August 16, 2014 and still owned by Emily Bellisario.

18 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 48:**

19 If any of the assets acquired prior to the parties' marriage were transferred or sold during
20 the marriage, please provide a copy of all documents and communications related to the transfer
21 or sale of said assets.

22 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 49:**

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DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF - 11

PLTF0723

1 Please provide a copy of all documents and communications between Emily Bellisario
2 and any member of the staff and/or faculty of Adelson Elementary School from January 1, 2017
3 to present.

4
5 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 50:**

6 Please provide a copy of all documents and communications between Emily Bellisario
7 and Bradley Bellisario from January 1, 2014 to present.

8 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 51:**

9 Please provide a copy of all documents evidencing payment of the home mortgage for the
10 residence located at 1913 Sondrio Drive from November 2013 to present.

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12 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 52:**

13 Please provide a copy of all applications for Orders for Protection Against Domestic
14 Violence filed by Emily Bellisario from January 1, 2012 to present.

15 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 53:**

16 Please provide a copy of all job applications filed by Emily Bellisario since August 16,
17 2014.

18
19 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 54:**

20 Please provide a copy of all transcripts for all post-secondary school education completed
21 by Emily Bellisario.

22 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 55:**

23 Please provide a copy of all documents and communications between Emily Bellisario
24 and any member of the staff and/or faculty of Staton Elementary School from January 1, 2017 to
25 present.

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27 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 56:**

28 DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF - 12

PL TF0724

1 Please provide a copy of all documents and communications between Emily Bellisario
2 and any member of the staff and/or faculty of Adelson Elementary School from January 1, 2017
3 to present.

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6 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 57:**

7 Please provide a copy of all receipts for travel expenses from September 17, 2019 to
8 present.

9 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 58:**

10 Please provide a copy of all cellular telephone bills related to the telephone number 702-
11 427-6745 from September 17, 2019 to present.

12 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 59:**

13 Please provide a copy of all photographs from Defendant's social media that during the
14 hearing on October 22, 2020 you claimed showed Defendant drinking, and therefore, demanded
15 that Defendant wear a SCRAM bracelet.

16 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 60:**

17 Please provide a copy of all paystubs received from all jobs allegedly held by Emily
18 Bellisario from September 17, 2019 to present.

19 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 61:**

20 On your Financial Disclosure Form filed March 9, 2020, you completed the section
21 entitled "Monthly Deductions." In said section you listed a \$95.00 deduction for health insurance.
22 Please provide any and all documents related to the healthcare payments and policies.

23 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 62:**

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DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF - 13

PLTF0725