

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. 13

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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 13 as follows:

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

Amanda Roberts, Esq.
efile@lvfamilylaw.com

/s/ Crystal Beville
Crystal Beville

MAY 12, 2021

Sent Via Electronic Service Only

Amanda Roberts
4411 S. Pecos Rd.
Las Vegas, NV 89121

RE: *Bellisario vs. Bellisario (D-20—605263-D)*

Ms. Amanda Roberts,

Please provide all contact information for the therapist you and your client have chosen to provide "treatment" to my son. As you are aware the court stated you are required to give me the information for the therapist. Please respond by 5:00 pm tomorrow.

Can't wait to hear from you, Moon Pie.

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

PLTF0787

Case Number: D-20-605263-D

AA3001

EXHIBIT “10”

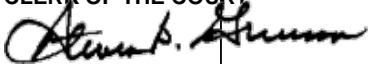
EXHIBIT “10”

EXHIBIT “10”

From: bradley bellisario <bradb@bellisariolaw.com>
Sent: Thursday, May 13, 2021 2:29 PM
To: efile
Subject: D-20-605263-d

What's the therapist info? Waiting. I will price you're dirty. And Judge Perry. You're helping abuse my child. You won't get away with it.

Sent from my iPhone



1 **RPLY**

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.

15 BRADLEY BELLISARIO,
16
17 Defendant

**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**

18 COMES NOW, Defendant, BRADLEY BELLISARIO, in proper person, and hereby
19 submits the following Reply to Plaintiff's Opposition to Defendant's Motion to Remove
20 S.C.R.A.M. Device; and Opposition to Plaintiff's Motion to Drug Test Defendant, For an Award
21 of Attorney's Fees and Costs, and Related Relief.

22 ///

23 ///

24 ///

25 ///

26 ///

27
28 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 - 1

1 This Reply and Opposition is made and based upon all the papers and pleadings on file herein
2 and the affidavit included herewith and is made in good faith and not to delay justice.
3

4 DATED this 17th day of May 2021.

5 _____
6 /s/ Bradley Bellisario
7 Bradley Bellisario
8 7100 Grand Montecito Pkwy, #2054
9 Las Vegas, NV 89149
10 T: 702.936.4800
11 F: 702.936.4801
12 E: bradb@bellisariolaw.com
13 *Defendant Pro Se*

14 **POINTS AND AUTHORITIES**

15 **I.** 16 **OBJECTION**

17 Defendant hereby reserves his right to object and move to strike at the time of oral
18 argument. Plaintiff was informed by Judge Perry to have any Opposition filed at least 24 hours
19 prior to the hearing. Plaintiff failed to do so, only filing their Opposition (and Countermotion) at
20 the close of business the day before the hearing on May 28th.

21 Plaintiff is attempting to file a Countermotion to force Defendant to be drug tested without
22 providing Defendant any time to reply, and in violation of EDCR 5.501 as Plaintiff has never
23 discussed a drug test with Defendant at any time in this matter.

24 **II.** 25 **STATEMENT OF FACTS**

26 There has never been an issue with the minor children in Defendant's care. NEVER.
27 Issues only arise from Emily's commitment to alienating the minor children and inflicting sever

28 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 - 2

1 emotional damages upon the minor children (WHICH CONSITUTES CHILD ABUSE PER
2 NRS). Defendant is steadfast in his resolve not to allow this Court to continue to go along with
3 Emily's lies and alienating behavior due to the Court's friendship with Amanda Roberts and
4 Donna Wilburn.

5
6 Plaintiff's Counsel, Amanda Roberts, Esq., is a dirty, underhanded attorney who uses
7 political connections and friendships to circumvent any finding of wrongdoing by herself. She
8 routinely commits fraud, fraud upon the court, and misrepresents facts because she knows the
9 Court has no power over her because they owe her favors. This matter is no different. Ms.
10 Roberts intentionally misrepresents facts, provides irrelevant factual allegations, and yet again
11 failed to abide by filing requirements and filed her Opposition and Countermotion late,
12 intentionally, to ensure she would deprive Defendant of due process and his ability to
13 appropriately respond to her complete nonsense.

14
15 This Court should take note that ALL issues in this matter have been cause by Emily's
16 willful withholding of the minor children, despite court orders commanding she provide visitation.
17 Every, single, issue has been started by Emily withholding visitation, alienating the children, and
18 abusing the mental state of the minor children.

19
20 Brayden has NOT been diagnosed by a competent therapist. However, I'm sure this Court
21 will inappropriately give weight to Donna Wilburn's findings because, like Ms. Roberts, Judge
22 Perry is close, personal friends with Donna Wilburn. Yet another reason why Judge Perry should
23 disqualify herself from this matter. But nonetheless, Defendant would like to bring to light that
24 Ms. Wilburn's "diagnosis" only came AFTER her services were terminated, and she made the
25 report claiming that Brayden has PTSD at the request of Emily Bellisario, who originally hired
26

27
28
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 - 3

1 her without Defendant's knowledge. Ms. Wilburn is uniformly known as a quack among
2 respected therapists and attorneys, no doubt why she feels such comfort in the business and
3 personal relationships formed with Ms. Roberts and Mr. Stoffel.

4
5 This Court should give more weight to the report generated by Dr. Nicolas Ponzo, who
6 prepared a report for this court who clearly stated that Emily Bellisario is either beginning or
7 perpetuating alienating behaviors, and her behavior, not Defendant's, will lead to emotional and
8 developmental harm to the minor children. Dr. Ponzo's Report. READ IT. Emily's continued
9 alienation and mental abuse of the minor children understandably causes Defendant to have raised
10 emotions. Any parent, when seeing their child be abused by the same person who mentally abused
11 them for so many years, would react in exactly the same manner. Especially when the Court as
12 created so many hoops for the parent to jump through simply to have the basic rights
13 constitutionally afforded to the parent. Further, any parent would act this way when the opposing
14 party and their attorney have committed fraud, fraud upon the court, openly lied on record
15 numerous times, and when these issues are raised the Court accepts and condones the corruption
16 of the judicial process.
17
18

19
20 **II.**
LEGAL ARGUMENT

21 **1. The S.C.R.A.M. Device Should be Removed.**

22 Defendant has been compliant with the S.C.R.A.M. program, which he never should have
23 been placed on in the first place. Defendant was not placed on S.C.R.A.M. monitoring during the
24 July 30, 2020 hearing (which is AFTER all the alleged incidents involving alcohol cited by
25 Plaintiff). Defendant was only placed on S.C.R.A.M. monitoring after Plaintiff's Counsel,
26 Amanda Roberts, Esq., claimed during the hearing on October 22, 2020 that Defendant's social
27 REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO REMOVE S.C.R.A.M. DEVICE;
28 AND OPPOSITION TO PLAINTIFF'S MOTION TO DRUG TEST DEFENDANT, FOR AN AWARD OF
ATTORNEY'S FEES AND COSTS, AND RELATED RELIEF - 4

1 media accounts had pictures that demonstrated Defendant was drinking. Amanda Roberts then
2 claimed that “we can see them,” yet failed to produce any evidence of said allegations. To this
3 day Amanda Roberts has yet to produce any substantiation of the allegations made October 22,
4 2020. Regardless, Defendant rushed to the S.C.R.A.M. office to have the device installed on
5 October 23, 2020 as Judge Pomrenze made that a prerequisite to seeing the minor children.
6

7 Since that time, Defendant has been 100% compliant with the S.C.R.A.M. program. On
8 November 24, 2020 after the hearing in this matter (which is on video) Defendant was forced to
9 cut the S.C.R.A.M. bracelet off due to a significant impact of the device on Defendant’s bone
10 caused by Defendant’s Peloton exercise bike. Defendant immediately contacted S.C.R.A.M. and
11 had the device reinstalled in approximately two (2) hours. Ms. Roberts attempts to mislead this
12 court as to thinking the device was cut off for a significant period of time, however, due to Ms.
13 Roberts’ request, Defendant was forced to show Ms. Roberts the S.C.R.A.M. bracelet on his leg
14 during the November 24, 2020 hearing (*See* video of November 24, 2020 hearing). As such,
15 Defendant can prove the device was only off for a matter of approximately two (2) hours.
16
17

18 Even the one incident reported by S.C.R.A.M. as a “confirmed alcohol consumption”
19 should be interpreted, by anyone with a brain who looks at the report, as a faulty report. As the
20 Court is well aware the S.C.R.A.M. devices are extremely sensitive and often produce false
21 reports. In this instance, the report clearly shows a charting of alcohol consumption that would
22 be extremely improbable. Defendant has not consumed alcohol since before the device was even
23 placed. Defendant believes the one reported incident was either a product inadvertently
24 containing alcohol or a byproduct of sleeping with a woman who had herself consumed alcohol.
25
26
27

28 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 - 5

1 Plaintiff's Counsel also alleges that she has no idea what could have possibly happened
2 between January 23, 2021 and February 17, 2021. The answer is simple. Plaintiff and Plaintiff's
3 Counsel had Defendant wrongfully arrested on January 23, 2021 while Defendant was returning
4 the minor children from court ordered visitation. Did Plaintiff's Counsel forget about that?! Wow
5 that's very convenient that she forgot about her own malfeasance and current lawsuit for wrongful
6 imprisonment. Once Defendant was released from jail, **AFTER BEING WRONGFULLY**
7 **ARRESTED FOR VIOLATION OF EXTENDED ORDER OF PROTECTION WHICH**
8 **WAS DISSOLVED PRIOR TO THE ALLEGED CONDUCT**, Defendant called S.C.R.A.M.
9 to set up an installment appointment. S.C.R.A.M. of Nevada is not a walk-in clinic and is very
10 busy. Defendant had the bracelet installed as quickly as he could.

13 Plaintiff's Counsel also contends that since the hearing on April 6, 2021, she has not been
14 getting updated reports as Ordered. However, S.C.R.A.M. of Nevada confirmed to Defendant
15 that they sent a report on May 5, 2021 to Department P. S.C.R.A.M. of Nevada confirmed that
16 they do not send reports on a weekly, biweekly, or monthly schedule. Rather, a report is generated
17 if there is a non-compliance issue and it is immediately sent to the Court. In this matter, Plaintiff's
18 Counsel for some odd reason believes she needs to verify the reports, and how she would do that
19 only god knows, because she has no magical power to interpret results from a negative report.

21 Defendant has been in compliance with the S.C.R.A.M. program. The only time
22 Defendant's bracelet was off for an extended period of time was when Plaintiff and Ms. Roberts
23 had Defendant **WRONGFULLY ARRESTED**. It's quite funny that Ms. Roberts conveniently
24 forgot about that and intentionally omitted those facts and intentionally misrepresents the facts
25 regarding that time period to this Court.

27
28
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 - 6

1
2 **2. Defendant Should NOT be Ordered to Take a Drug Test.**

3 NRCP 35 permits the Court to order any party to submit to a mental or physical health
4 examination. "The order may be made only on motion for good cause and on notice to all parties
5 and the person to be examined." NRCP 35(a)(2)(A).

6 In this matter Plaintiff attempts to sneak in another bogus hoop for Defendant to jump
7 through in the form of a court ordered drug test. Plaintiff is unhappy that her unsubstantiated
8 claim that Defendant was constantly using alcohol fell flat on its face, now she's trying to make
9 up any further allegations to smear Defendant.

11 Plaintiff's Motion must fail for two (2) reasons; (1) Plaintiff makes no showing of "good
12 cause" as for the need of a drug test; and (2) Plaintiff does not give constitutionally required notice
13 of Plaintiff's new unfounded request as she filed for relief nineteen (19) hours before the date set
14 for hearing.

16 Plaintiff makes no "good cause" showing regarding a drug test. Plaintiff also made no
17 "good cause" showing regarding a request for S.C.R.A.M. In that instance Plaintiff's Counsel
18 LIED TO THE COURT and claimed that Defendant's social media account pictures demonstrate
19 Defendant was drinking, however could show no proof of her claims as there was no proof
20 available. Likewise, here, Plaintiff makes no showing of any proof, or good cause, regarding the
21 need for a drug test. Plaintiff does not even allege that Defendant uses drugs. Plaintiff simply is
22 attempting to have this Court Order another unnecessary hoop for Defendant to jump through.

24 As Plaintiff fails to make any good faith showing of "good cause" regarding a drug test,
25 and Plaintiff attempts to file a motion for relief a mere nineteen (19) hours before the date set for
26

27
28
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 - 7

1 hearing, Plaintiff's Countermotion for drug testing should fail. Plaintiff's theory that she's going
2 to allege everything and prove nothing needs to be put to a stop.

3
4 **III.**
CONCLUSION

5 Defendant never should have been placed on S.C.R.A.M. to begin with. Plaintiff
6 provided no proof as alleged at the October 22, 2020 hearing, and provides no proof of non-
7 compliance now. Except for.....wait...they claim Defendant was non-compliant **WHEN**
8 **PLAINTIFF AND HER COUNSEL HAD DEFENDANT WRONGFULLY ARRESTED**
9 **AND THE POLICE REMOVED THE DEVICE.** Additionally, Plaintiff alleges no facts
10 regarding any drug use by Defendant and filed her motion a mere nineteen (19) hours prior to the
11 date set for hearing on the matter. As such her counterclaim must fail.
12

13
14 DATED this 17th day of May 2021.

15
16 /s/ Bradley Bellisario
17 Bradley Bellisario
18 7100 Grand Montecito Pkwy, #2054
19 Las Vegas, NV 89149
20 T: 702.936.4800
21 F: 702.936.4801
22 E: bradb@bellisariolaw.com
23 *Defendant Pro Se*
24
25
26
27
28

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 - 8

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1. I am the Defendant in the above entitled matter;
2. That I read the foregoing Reply and Opposition, including the points and authorities and any exhibits attached hereto and the same are true and correct to the best of my knowledge and belief; and
3. For the reasons stated in the Motion, I am requesting that the Court grant me the relief sought in my Motion.

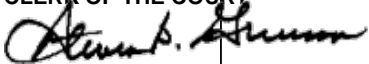
DATED this 17th day of May 2021.

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 - 9

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Amanda Roberts, Esq.
E: efile@lvfamilylaw.com
Attorney for Plaintiff

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 - 10



1 **OPPS (FAM)**
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
11 **CLARK COUNTY, NEVADA**

12 EMILY BELLISARIO,
13
14 Plaintiff,

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

15 vs.

16 BRADLEY BELLISARIO,
17
18 Defendant

**OPPOSITION TO PLAINTIFF'S
NOTICE OF MOTION AND MOTION
FOR PROTECTION ORDER RELATING
TO BRADLEY'S DISCOVERY
REQUESTS AND SUBPOENAS, FOR AN
AWARD OF ATTORNEYS' FEES AND
COSTS, AND RELATED RELIEF.**

19 COMES NOW, Defendant, BRADLEY BELLISARIO, in proper person, and hereby
20 submits the following Opposition to Plaintiff's Notice of Motion and Motion for Protection Order
21 Relating to Bradley's Discovery Requests and Subpoenas, For an Award of Attorney's Fees and
22 Costs, and Related Relief.

23 ///

24 ///

25 ///

26 ///

27 ///

28 **OPPOSITION TO PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR PROTECTION ORDER
RELATING TO BRADLEY'S DISCOVERY REQUESTS AND SUBPOENAS, FOR AN AWARD OF
ATTORNEYS' FEES AND COSTS, AND RELATED RELIEF. - 1**

1 This Opposition is made and based upon all the papers and pleadings on file herein and the
2 affidavit included herewith and is made in good faith and not to delay justice.

3
4 DATED this 17th day of May 2021.

5
6 /s/ Bradley Bellisario
7 Bradley Bellisario
8 7100 Grand Montecito Pkwy, #2054
9 Las Vegas, NV 89149
10 T: 702.936.4800
11 F: 702.936.4801
12 E: bradb@bellisariolaw.com
13 *Defendant Pro Se*

14
15 **POINTS AND AUTHORITIES.**

16
17 **I.**
18 **STATEMENT OF FACTS**

19 Defendant has complied with NRCP 16.2 as previously required by the Court. Defendant
20 is not required to supply information to Plaintiff that Defendant is not in possession of at the time
21 and has attempted to retrieve.

22 On April 6, 2021 the Discovery Commissioner's Report and Recommendations was
23 entered. On April 6, 2021 approximately five (5) hours later Judge Mary Perry fraudulently
24 entered an Order confirming the Discovery Commissioner's Report and Recommendations and
25 state that Defendant failed to file a timely objection (in the five (5) hours allotted to Defendant).
26 On April 7, 2021 the parties were again before the Discovery Commissioner and Amanda Roberts
27 relied on the Order entered by her close, personal friend, Judge Mary Perry, and claimed that she
28 was entitled to requested relief as Judge Perry had entered the Order Confirming the Discovery
Commissioner's Report and Recommendations. After using the fraudulent Order to her benefit,

OPPOSITION TO PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR PROTECTION ORDER
RELATING TO BRADLEY'S DISCOVERY REQUESTS AND SUBPOENAS, FOR AN AWARD OF
ATTORNEYS' FEES AND COSTS, AND RELATED RELIEF. - 2

1 Amanda Roberts had Judge Mary Perry file a minute order striking the Order Confirming the
2 Discovery Commissioner's Report and Recommendations on April 8, 2021. However, the minute
3 order was never served on Defendant. Defendant, believing he had sixty (60) days to file relief
4 pursuant to NRCP 60 was then served with another Order Confirming the Discovery
5 Commissioner's Report and Recommendations on April 23, 2021. That came as a complete shock
6 to Defendant as Judge Perry had already fraudulently filed an Order on April 6, 2021 regarding
7 the same issue.
8

9 Plaintiff now comes to the Discovery Commissioner with a motion void of legal support,
10 basically requesting a protective order because she doesn't want Defendant to inquire about
11 Plaintiff's continued fraud. Her Motion is VOID of LEGAL SUPPORT.
12

13
14 Attempts to Resolve

15 Once again, Amanda Roberts, Esq. intentionally misrepresents the facts of this matter as
16 she is incapable of producing any document without fraud, fraudulent misrepresentation, or fraud
17 upon the court. She is an unethical whale that relies on illegal tactics to gain any advantage she
18 can.
19

20 In this matter, Ms. Roberts unilateral set a date for a discovery dispute conference.
21 Defendant was busy at the time specified by Ms. Roberts and Defendant requested the discovery
22 dispute conference be rescheduled. Ms. Roberts then stated she was in an all-day trial, which
23 court records display Ms. Roberts lied. Ms. Roberts then sent a letter stating her complaints
24 regarding Defendant's discovery requests. Defendant responded that Defendant would gladly
25 retract his Subpoena to the State Bar if Ms. Roberts provided any case law or rule that supported
26

27
28 OPPOSITION TO PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR PROTECTION ORDER
RELATING TO BRADLEY'S DISCOVERY REQUESTS AND SUBPOENAS, FOR AN AWARD OF
ATTORNEYS' FEES AND COSTS, AND RELATED RELIEF. - 3

1 her argument. However, Ms. Roberts has no support for her contention and instead simply filed
2 her Motion for Protective Order rather than providing any support for her claim. Ms. Roberts
3 could have provided any support and Defendant would have resolved the matter accordingly.
4

5 **II.**
6 **LEGAL ARGUMENT**

7 **1. Plaintiff's Requested Protective Order Should be Denied.**

8 In this matter Plaintiff provides no legal support for her motion for protective order.
9 Pursuant to EDCR 2.20(c) "a party filing a motion must also serve and file with it a memorandum
10 of points and authorities in support of each ground thereof. The absence of such memorandum
11 may be construed as an admission that the motion is not meritorious, as cause for its denial or
12 waiver of all grounds not so supported."
13

14 Plaintiff's sole contention is that Defendant failed to comply with NRCP 16.2 and
15 therefore is not allowed permitted to conduct discovery. Plaintiff, however, fails to demonstrate
16 how Defendant has failed to comply with NRCP 16.2. Her bald allegation should not be
17 persuasive.
18

19 Plaintiff then contends that if Defendant complied with NRCP 16.2 that Plaintiff should
20 be awarded a protective order regarding four (4) subpoenas: AAA Flooring, Inc.; Allied Flooring
21 Services; Nevada State Bar; and State of Nevada Board of Examiners for Marriage & Family
22 Therapists & Clinical Professional Counselors.

23 Regarding the Subpoenas to AAA Flooring, Inc. and Allied Flooring Services Plaintiff
24 claims Defendant did not limit the period of time for the request. However, Plaintiff's claim is
25 untrue. Defendant clearly states the period of time in his request as "since the commencement of
26 her employment." The time period should not be limited to the time of the parties' marriage as
27
28
OPPOSITION TO PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR PROTECTION ORDER
RELATING TO BRADLEY'S DISCOVERY REQUESTS AND SUBPOENAS, FOR AN AWARD OF
ATTORNEYS' FEES AND COSTS, AND RELATED RELIEF. - 4

1 Plaintiff claims she was hired in 2015, however, Defendant alleges, and will be able to prove, that
2 Plaintiff lied and she has been on payroll by her father's company for many years, not limited to
3 2015 to present. Defendant has alleged many times Plaintiff has lied about her employment and
4 that employment records will demonstrate Plaintiff has a long history of alleged employment by
5 the company. The records prior to the parties' marriage are relevant to Defendants claims and
6 should be permitted.
7

8 Regarding the subpoena to the State Bar of Nevada, Plaintiff claims the request is not
9 relevant. Further, Plaintiff claims that somehow because Judge Perry claimed attorney's cannot
10 be held in contempt (which is absolutely not true and not supported by any rule or case law,
11 actually many cases and rules state the opposite) that Plaintiff should be awarded a protective
12 order. In this matter, Defendant has alleged fraud upon the court, systematic ethics violations,
13 and has alleged that Ms. Roberts has a history of similar acts constituting fraud upon the court.
14 Additionally, Defendant has filed multiple State Bar of Nevada Ethics Complaints against Ms.
15 Roberts and needs to obtain copies of such disciplinary filings. Although Plaintiff provides no
16 legal support as to her request, Defendant alleges that the information sought is relevant to support
17 his allegations of systematic fraud upon the court to support Defendant's Motion to Disqualify
18 Amanda Roberts for ethical violations.
19
20

21 As for the subpoena to the State Board of Examiners Plaintiff fails to even allege any facts,
22 rules, law, or anything at all regarding her request. The request is for a "treating" therapist that
23 committed fraud regarding treatment of the parties' minor son. Ms. Wilburn is the subject of
24 numerous ethical violation complaints and allegations of malpractice, some including association
25
26
27

28 OPPOSITION TO PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR PROTECTION ORDER
RELATING TO BRADLEY'S DISCOVERY REQUESTS AND SUBPOENAS, FOR AN AWARD OF
ATTORNEYS' FEES AND COSTS, AND RELATED RELIEF. - 5

1 with Amanda Roberts as counsel. The information sought is relevant as it goes toward the
2 legitimacy and credibility of any information provided by Donna Wilburn.

3
4 **2. Plaintiff's Request for Attorney's Fees Should be Denied.**

5 Plaintiff failed to abide by EDCR 5.501 and EDCR 5.602. Defendant stated in his letters
6 the consummate fraudster, Amanda Roberts, Esq., that Defendant would withdraw the
7 complained of discovery requests if Ms. Roberts provided any legal reasoning. Ms. Roberts
8 decided to instead file a motion for protective order, still with no legal reasoning.

10 Additionally, as previously provided to this discovery commissioner, Ms. Roberts
11 application for fees should be denied. The case law provided by Ms. Roberts refers to the instance
12 where one spouse has significant assets and a substantially larger income than the other spouse.
13 In this instance Plaintiff and Defendant claim to have similar incomes. Additionally, please note
14 that Plaintiff's contention regarding the Court finding that Defendant's income is \$18,000 per
15 month was PROCURED BY FRAUD PERPETRATED BY AMANDA ROBERTS.
16 Additionally, long ago Defendant filed an updated FDF stating the Defendant is unemployed and
17 has no income. Amanda Roberts chose to intentionally misrepresent this fact to the court, and
18 continue to commit fraud upon the court in this matter.

19
20
21 As such, Plaintiff's request for attorney's fees must be denied.

22 **III.**
23 **CONCLUSION**

24 Plaintiff provides NO LEGAL SUPPORT for her motion. Plaintiff is apparently standing
25 on the theory of she wants a protective order so give her a protective order. So persuasive, Bravo,
26 Amanda. Defendant has complied with NRCP 16.2. Plaintiff and Judge Perry committed fraud

27
28 OPPOSITION TO PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR PROTECTION ORDER
RELATING TO BRADLEY'S DISCOVERY REQUESTS AND SUBPOENAS, FOR AN AWARD OF
ATTORNEYS' FEES AND COSTS, AND RELATED RELIEF. - 6

1 upon the court by acting in concert to fraudulently file the previous Order regarding the Discovery
2 Commissioner's Report and Recommendation. Plaintiff's Counsel simply filed this motion to be
3 able to bill her client because she has a fish on the line that she's hooked and she knows she can
4 milk as much money as she can out of her. Amanda Roberts could have simply provided any
5 legal reasoning and Defendant was willing to withdraw the complained of discovery request.
6

7
8 DATED this 17^h day of May 2021.

9 /s/ Bradley Bellisario
10 Bradley Bellisario
11 7100 Grand Montecito Pkwy, #2054
12 Las Vegas, NV 89149
13 T: 702.936.4800
14 F: 702.936.4801
15 E: bradb@bellisariolaw.com
16 *Defendant Pro Se*
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28 OPPOSITION TO PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR PROTECTION ORDER
RELATING TO BRADLEY'S DISCOVERY REQUESTS AND SUBPOENAS, FOR AN AWARD OF
ATTORNEYS' FEES AND COSTS, AND RELATED RELIEF. - 7

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1. I am the Defendant in the above entitled matter;
2. That I read the foregoing Opposition, including the points and authorities and any exhibits attached hereto and the same are true and correct to the best of my knowledge and belief;
and
3. For the reasons stated in the Motion, I am requesting that the Court grant me the relief sought in my Motion.

DATED this 17th day of May 2021.

OPPOSITION TO PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR PROTECTION ORDER
RELATING TO BRADLEY'S DISCOVERY REQUESTS AND SUBPOENAS, FOR AN AWARD OF
ATTORNEYS' FEES AND COSTS, AND RELATED RELIEF. - 8

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Amanda Roberts, Esq.
E: efile@lvfamilylaw.com
Attorney for Plaintiff

OPPOSITION TO PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR PROTECTION ORDER
RELATING TO BRADLEY'S DISCOVERY REQUESTS AND SUBPOENAS, FOR AN AWARD OF
ATTORNEYS' FEES AND COSTS, AND RELATED RELIEF. - 9

Divorce - Complaint

COURT MINUTES

May 18, 2021

D-20-605263-D Emily Bellisario, Plaintiff
vs.
Bradley John Bellisario, Defendant.

May 18, 2021 11:00 AM All Pending Motions

HEARD BY: Perry, Mary COURTROOM: Courtroom 23

COURT CLERK: Medina, Kyle

PARTIES PRESENT:

Emily Bellisario, Counter Defendant, Plaintiff, Present Amanda M Roberts, ESQ, Attorney, Present

Bradley John Bellisario, Counter Claimant, Defendant, Present Pro Se

Brayden Bellisario, Subject Minor, Not Present

Blake Bellisario, Subject Minor, Not Present

Brooklyn Bellisario, Subject Minor, Not Present

JOURNAL ENTRIES

PLTF'S OPPOSITION TO DEFT'S MOTION FOR RELIEF FROM ORDER AFTER HEARING REGARDING HEARING ON January 25, 2021 AND MOTION FOR LEAVE OF COURT TO REFINANCE TO DEEM DEFT VEXATIOUS LITIGANT WAIVE DONNA'S HOUSE FEES AND FOR AN AWARD OF ATTY FEES AND COSTS DEFENDANT'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 DEFENDANT'S REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR RELIEF FROM ORDER AFTER HEARING ON January 25 AND RELATED MATTERS DEFENDANT'S 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 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.

In the interest of public safety due to the Coronavirus pandemic, all parties were present via VIDEO CONFERENCE through the BlueJeans application.

Court reviewed the history of the case and pleadings on file. Court noted that there is no need for the Defendant to wear the Scram device any longer. Attorney Roberts stated her argument that the Defendant continues to have an erratic behavior for his visitations with the Minor Children.

Parties stated arguments regarding who will do the psychological evaluation on the Defendant and who the Minor Child was seeking treatment from. Further argument regarding the lis pendens on the home, arrears on the mortgage payments, the parties ability to pay attorneys fees and costs and pleadings before the Court.

COURT ORDERED the following:

The Defendant is no longer Ordered to have the SCRAM device and shall remove it due to a consistent negative result.

The Defendant shall provide the Court the emails and Talking parents/Family Wizard communication that states when the therapy began for the Minor Child that the Defendant did not give permission to.

The Defendant shall choose 3 people from the prior Court's list which the Department's Judicial Executive Assistant will provide to Perform a psychological evaluation not to exceed the price of \$4,000.00 and provide the list to Attorney Roberts by Friday May 21, 2021 at 12:00 pm. The Defendant shall be required to reimburse the Plaintiff for the amount she has already paid to Dr. Holland.

The Defendant shall provide Attorney Roberts with a report of the last SCRAM results and a list of work search from April to present. by Friday May 21, 2021 at 12:00 pm.

Court will lift the lis pendens that is on the Sole and Separate home of the Plaintiff. The Plaintiff's request to refinance the home is GRANTED.

The Court will GRANT the arrears up to the February 5th Motion and will leave it open to be amended from February on.

The Court will not deem the Defendant a vexatious litigant at this time.

Pursuant to the Court's Order from April the Defendant on May 12, 2021 has not responded to the provided list of three receivers and three CPA'S. Therefore the Court chooses the middle name on each list which is Dan Marks as the receiver and Bo Johnson as the CPA.

Defendant's Motion to reconsider Order Against Domestic Violence shall STAND and shall be reviewed after the criminal case is heard in July 2021.

Defendant's Motion for relief regarding the hearing on January 25, 2021 is DENIED because video recordings from each hearing is controlling.

The Plaintiff's request for Attorney's fees are DEFERRED at this time.

The Motion to disqualify Judge Mary Perry is DENIED

Return Hearing SET for September 16, 2021 at 9:00 am.

Attorney Roberts shall prepare the Order from today and submit it to the Court.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Jun 16, 2021 10:00AM Motion
Courtroom 23 Perry, Mary

Jun 16, 2021 1:00PM Motion
Courtroom 20 Young, Jay

Jun 23, 2021 10:00AM Motion
Courtroom 23 Perry, Mary

Sep 16, 2021 9:00AM Return Hearing
Courtroom 23 Perry, Mary

FILED

AUG 19 2021

Alison A. Blinn
CLERK OF COURT

ORIGINAL

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

EMILY BELLISARIO,)
)
Plaintiff,)
)
vs.)
)
BRADLEY JOHN BELLISARIO,)
)
Defendant.)

CASE NO. D-20-605263-D

DEPT. P

BEFORE THE HONORABLE MARY PERRY
DISTRICT COURT JUDGE

TRANSCRIPT RE: ALL PENDING MOTIONS

TUESDAY, MAY 18, 2021

APPEARANCES:

(PARTICIPANTS APPEAR VIRTUALLY)

The Plaintiff:	EMILY BELLISARIO
For the Plaintiff:	AMANDA M. ROBERTS, ESQ. 4411 S. Pecos Rd. Las Vegas, Nevada 89121 (702) 474-7007
The Defendant:	BRADLEY JOHN BELLISARIO, ESQ.
For the Defendant:	PRO SE

1 LAS VEGAS, NEVADA

TUESDAY, MAY 18, 2021

2 PROCEEDINGS

3 THE FOLLOWING TRANSCRIPT CONTAINS MULTIPLE INDISCERNIBLES
4 DUE TO POOR RECORDING QUALITY)

5 (THE PROCEEDINGS BEGAN AT 11:54:12)

6
7 THE CLERK: We're on the record.

8 THE COURT: Good morning. We are on the record in
9 case number D-20-605263-D, Bellisario versus Bellisario. May
10 I please have appearances, beginning with Ms. Roberts.

11 MS. ROBERTS: Your Honor, I'm in the middle of a
12 hearing still. I'm so sorry. We --

13 THE DEFENDANT: Yes, Your Honor. I'll
14 (indiscernible).

15 UNIDENTIFIED VOICE: Okay. If you could just bring
16 those in person to the date of trial.

17 MS. ROBERTS: We're almost done, Your Honor. If you
18 can just trail it for two minutes, I'm almost done. It's just
19 the calendar call.

20 THE COURT: Okay.

21 (COURT RECESSED AT 11:54 AND RESUMED AT 11:57)

22 THE CLERK: We're back on, Judge.

23 THE COURT: Okay. We are back on the record with
24 Bellisario. May I please have Ms. Roberts' appearance?

1 MS. ROBERTS: Amanda Roberts, bar number 9294, on
2 behalf of the Plaintiff Emily Bellisario who is appearing
3 through BlueJeans. And Your Honor, I apologize. I was in the
4 middle of my 11:30 hearing when you called us.

5 THE COURT: That's okay. I understand. I had one
6 that should have lasted for 15 minutes and took an hour. So I
7 can't hold you responsible for that. Mr. Bellisario, how are
8 you doing today?

9 THE DEFENDANT: I'm fine, Your Honor.

10 THE COURT: All right. Fantastic. Okay. We are
11 here today on Mr. Bellisario's motion for relief from order
12 regarding hearing on January 25th, 2021, a motion for leave to
13 file renewed motion to disqualify Judge Mary Perry, and then
14 we've got Ms. Bellisario's opposition and counterclaim for
15 leave to refinance her separate property house, and to deem
16 Bradley as a vexatious litigant. And then, let me see, I know
17 there was a reply filed or something on that there. We are
18 also here on Mr. Bellisario's motion for reconsideration of
19 the 4/6/2021 hearing, the amended order at 4/22/21, as it
20 pertains to the order against domestic violence.

21 We've got the opposition and countermotion for
22 attorney's fees, reconfirmed and -- something reconfirmed in
23 5/10/2021, notice of opposition due to the Clerk giving
24 Bradley a nonconforming notice, which I'm not sure exactly

1 what that is.

2 And then I believe there is another motion that
3 needs to go before the Discovery Commissioner and not here.
4 Let me look and see what's up here. Yeah. And so -- and the
5 motion for any discovery is going to go in front of the
6 Discovery Commissioner and then we've got a motion to remove
7 the SCRAM device. Did we ever get a hearing set for that one?
8 Yes, we do. It was on 6/23 and I said I was going to move it
9 forward to hear it today. I do not want another month of cost
10 going out for a SCRAM bracelet that's really not showing
11 anything. So I'm kind of starting backwards on this. Pretty
12 sure Mr. Bellisario doesn't have an argument on that one.

13 Ms. Roberts, I read your opposition and all on that
14 there. I understand that and I know that he had a DUI for
15 either alcohol or -- and/or drugs. But without anything more,
16 I don't think we really rise to the point of testing him even
17 for drugs at this point.

18 MS. ROBERTS: So Your Honor --

19 THE COURT: And you're --

20 MS. ROBERTS: -- we outlined for the Court his
21 erratic and concerning behavior. He just filed another
22 document with the court again doing the same exact behavior.
23 And I -- we outlined it for the Court. It's been going on
24 since 2019.

1 THE COURT: It has been.

2 MS. ROBERTS: He clearly has some issue, Your Honor.
3 We've outlined it. And there --

4 THE COURT: And --

5 MS. ROBERTS: -- are issues pertaining to that.
6 We've given the Court the law regarding that issue. And we've
7 outlined it requesting that he be done. In fact, Your Honor,
8 the most recent court order from Donna's House gave the Court
9 a detailed report from Donna's House. And that report
10 includes that Bradley was struggling -- I'm sorry, that he was
11 -- that he exploded cursing, invading --

12 THE COURT: Correct.

13 MS. ROBERTS: -- personal space of the staff,
14 disrupting other families, causing staff members to cry all
15 while noting -- noting that he is under the microscope of the
16 Court.

17 THE COURT: Correct.

18 MS. ROBERTS: The children were present -- sorry.

19 THE COURT: You know, the -- the key with this here
20 is I -- you know, this is one of the reasons why you've
21 requested a psychological evaluation. And I granted that
22 psychological evaluation. So if that comes back and there is
23 -- and -- and he's perfectly a-okay on that area, then -- then
24 maybe we will look for drug testing. But I really don't think

1 Mr. Bellisario -- I -- I don't think he's doing drugs, you
2 know.

3 MS. ROBERTS: Okay. Well, then you said -- you said
4 at the last hearing we were going to address those
5 psychological evaluations.

6 THE COURT: Correct.

7 MS. ROBERTS: So we had paid for it as -- sorry.

8 THE COURT: Yeah, you know, you're going to -- you
9 -- you all are each going to be paying for each other's, you
10 know.

11 MS. ROBERTS: We have --

12 THE COURT: Now --

13 MS. ROBERTS: We have done that, Your Honor. We
14 have paid for it as ordered. We were supposed to have a
15 return on it already.

16 THE COURT: Yeah.

17 MS. ROBERTS: Mr. Bellisario has informed Dr.
18 Holland's office that he will not be cooperating with that
19 psychological evaluation.

20 THE COURT: Then he will be on supervised visits
21 until he does. And if we run out of supervisors because he
22 keeps having these explosive -- you know, if -- if that's --
23 if -- if the explosive behavior continues happening and he
24 starts being violent in front of a bunch of other third

1 parties and we run out of people, then he's not even going to
2 get supervised visits. I've -- you know, I -- I hate to do it
3 because I really think the children need both parents, but if
4 he's going to behave like that in public while he's under the
5 microscope of the Co -- of -- of the Court, you know, there's
6 a reason why and I don't know why.

7 Mr. Bellisario, you've -- you know, you're choosing
8 a course of conduct in this case and it's very concerning.
9 You know, I'm not sure why but it -- your behavior is becoming
10 increasingly erratic and it's all based on --

11 THE DEFENDANT: (Indiscernible) --

12 THE COURT: -- your own actions. Hold on, sir.
13 Please let me finish.

14 THE DEFENDANT: (Indiscernible) for more than two
15 hours. It says January 23rd.

16 THE COURT: And whose --

17 THE DEFENDANT: Plaintiff --

18 THE COURT: -- fault is it? Fol --

19 THE DEFENDANT: That is hers.

20 THE COURT: Follow the Court's orders. Please go
21 get a psych eval so that we can start working --

22 THE DEFENDANT: Listen.

23 THE COURT: -- towards something besides --

24 THE DEFENDANT: Listen.

1 THE COURT: -- supervised visits.
2 THE DEFENDANT: Right. And that psych eval, I was
3 going to agree to do it with someone. I'm not agreeing to --
4 THE COURT: Yeah.
5 THE DEFENDANT: -- Holland.
6 THE COURT: And --
7 THE DEFENDANT: The reason you (indiscernible) --
8 THE COURT: And you know what, I -- I kind of agree
9 with him on that one there. Who -- who would you like, Mr.
10 Bellisario?
11 THE DEFENDANT: That's what -- I don't know --
12 THE COURT: Give us a couple names.
13 THE DEFENDANT: -- the people (indiscernible) --
14 THE COURT: What about --
15 THE DEFENDANT: Can I have a date?
16 THE COURT: -- Dr. Paglini? A fine gentleman.
17 THE DEFENDANT: I don't know the names. Can I have
18 like a day or two to provide the names to them, a list of
19 three, and then --
20 THE COURT: Sure.
21 THE DEFENDANT: -- they can pick one.
22 THE COURT: Sure.
23 MS. ROBERTS: Your Honor, this is absolutely
24 ridiculous. We paid Dr. Holland. We complied with your

1 order. If he wants to change it, Your Honor, he needs to file
2 a motion. This is absolutely ridiculous that we're sitting
3 here. We've complied with every one of this Court's orders --

4 THE COURT: I know you have.

5 MS. ROBERTS: -- including discovery --

6 THE COURT: I know you have. Hey, you know, we both
7 know you've got to feel comfortable with the person who is
8 doing this psych eval so you know you're not being pull (sic).
9 You know what, the Family Court used to have a list of people.
10 I want somebody that knows how to do proper reports to the
11 Family Court.

12 MS. ROBERTS: Your Honor, Dr. Holland has already
13 started the process. So that means my client is not going to
14 get all of her money back. So if that's what the -- Mr.
15 Bellisario is requesting and he hasn't filed a proper request,
16 then he needs to pay for it. It's unfair for this Court to
17 instruct my client --

18 THE COURT: Hold on.

19 MS. ROBERTS: -- to do something.

20 THE COURT: Ms. Roberts --

21 MS. ROBERTS: She's complied --

22 THE COURT: -- she's only supposed to be paying for
23 him.

24 MS. ROBERTS: Right. And the -- and Dr. Holland has

1 already commenced that process, Your Honor. Because we paid
2 as ordered.

3 THE COURT: I don't --

4 THE DEFENDANT: (Indiscernible) --

5 THE COURT: Did I -- did I order for Dr. Holland or
6 was that what Judge Pomrenze have ordered? Because I found
7 back --

8 MS. ROBERTS: No, Your Honor.

9 THE COURT: -- in 2020 --

10 MS. ROBERTS: You ordered Dr. Holland specifically
11 at the hearing in April because she was stipulated to to do
12 the custody eval --

13 THE COURT: Yeah.

14 MS. ROBERTS: -- and you --

15 THE COURT: Okay.

16 MS. ROBERTS: -- said go --

17 THE COURT: That's right.

18 MS. ROBERTS: -- back to Dr. Holland because if Dr.
19 Holland needs to do the entire custody evaluation, then --
20 then she would have the psychological component completed. So
21 that's what we did. We immediately communicated and paid the
22 money to Dr. Holland as you ordered.

23 THE COURT: Okay. Now, let's have Mr. Bellisario
24 have a word in edgewise. Yes, sir?

1 THE DEFENDANT: And that was my issue was that it
2 was the one that was stipulated to in that agreement which I
3 claimed was procured by fraud because they lied to get me to
4 sign that agreement. So I don't want to --

5 THE COURT: How did they --

6 THE DEFENDANT: -- rely on the one --

7 THE COURT: -- lie to you, sir? How did they lie to
8 you?

9 THE DEFENDANT: Oh, because -- so there's a -- a
10 case against Ms. Roberts for this. So they claimed that, oh,
11 we'll be choosing a therapist for Brayden that's a mutual
12 party, blah, blah, blah, going forward. Right.

13 THE COURT: Yeah.

14 THE DEFENDANT: They had already started Brayden
15 treating with a therapist who I had specifically said no to at
16 that point. I would have never signed that contract or agreed
17 to that stipulation if they had said Anna Trujillo (ph) is
18 treating Brayden. So they got me to -- to agree to that
19 stipulation and order by fraud. Because they already had him
20 treating. Emily -- Emily signed the consent waiver stating
21 that I agreed to treatment with Anna Trujillo when I
22 specifically told her not. It's on OurFamilyWizard. I told
23 her no.

24 THE COURT: Is that true, Ms. Roberts? Did -- did

1 he say no? I mean, I know right now is -- she's got the sole
2 legal custody. But did he say no when he had joint legal?

3 THE PLAINTIFF: Can I speak -- can I speak, please?

4 THE COURT: Yes, ma'am. You may.

5 THE PLAINTIFF: At the time, the only email that had
6 been sent was he said I consent to therapy. So that very
7 second I jumped on the phone call to get a therapist because
8 it is -- it is very hard to --

9 THE COURT: Okay.

10 THE PLAINTIFF: -- get a therapist.

11 THE COURT: But he has to be able to --

12 THE PLAINTIFF: And also --

13 THE COURT: Ms. Bellisario --

14 THE PLAINTIFF: -- I had --

15 THE COURT: -- he -- he really did need to consent
16 to the therapist as well. He consented to therapy --

17 THE PLAINTIFF: He --

18 THE COURT: -- but he also needed to consent to the
19 therapist.

20 THE PLAINTIFF: I am not a -- a judge and I am not
21 an attorney.

22 THE COURT: Yeah, but you've all --

23 THE PLAINTIFF: All I heard --

24 THE COURT: You've had Ms. Roberts.

1 THE PLAINTIFF: Listen, all I've --
2 THE COURT: You've had Ms. --
3 THE PLAINTIFF: All I wanted --
4 THE COURT: Ms. --
5 THE PLAINTIFF: I didn't -- I didn't have Ms.
6 Roberts at the time. I'm sorry, I didn't. All I heard was he
7 can be seen by a therapist and I jumped on it. So I said he
8 needs to be treated ASAP. And I did not hesitate to treat my
9 son. I did what I thought was best for him as a mother and it
10 was.
11 THE DEFENDANT: Well, no, Your Honor, I actually --
12 MS. ROBERTS: Your Honor --
13 THE DEFENDANT: -- have that.
14 MS. ROBERTS: -- if I --
15 THE COURT: Hang on.
16 MS. ROBERTS: -- can address the stip and order,
17 Your Honor. The stipulation and order just says that it'll be
18 someone other than Donna Wilburn an then we agreed to a
19 custody evaluation with Dr. Holland. That's what it is. If
20 the Court looks at it, it was filed in June of 2020.
21 THE DEFENDANT: And by omitting the fact that you
22 already had him treating with someone when we're saying we're
23 going to pick someone who is neutral, that is fraud by
24 omission.

1 THE COURT: Okay.
2 THE PLAINTIFF: No --
3 THE COURT: Mr. --
4 THE DEFENDANT: That is (indiscernible) --
5 THE PLAINTIFF: -- we did not have --
6 THE COURT: Mr. -- Mr. Bellisario --
7 THE PLAINTIFF: We did not have one --
8 THE COURT: Hang on. Hang on.
9 THE PLAINTIFF: He did not have anyone --
10 THE COURT: Hang on.
11 THE PLAINTIFF: -- chosen.
12 THE COURT: Time out. Time out. Time out. Time
13 out. Okay. I am not going to have the two of you or three of
14 you speaking over each other. All right. Mr. Bellisario,
15 here's what I want you to do for me, please. I -- I need a
16 timeline. So give me your e -- your email with Talking
17 Parents or FamilyWizard, whichever one it was, when the
18 therapy began because you're going to have -- I believe you're
19 going to be able to come up with the paperwork.
20 So give me this paperwork to show that she had
21 already had him in therapy before that permission from you,
22 okay?
23 THE DEFENDANT: Okay.
24 THE COURT: All right. Get me that and I will take

1 care of that if you -- if you can show that to me. All right?
2 Because I do find stepping on the parent's legal rights is
3 really not good at all. Okay. I'll take care of that later.
4 So get that for me, please.

5 THE DEFENDANT: Yes.

6 THE COURT: But until then, will you please
7 cooperate with -- with Dr. Holland? She is good. I like Dr.
8 Paglini as well --

9 THE DEFENDANT: So --

10 THE COURT: -- but, I -- you know, I think Dr.
11 Holland may be a little bit better for you. Paglini is a
12 close second.

13 THE DEFENDANT: The issue is I think she -- I mean,
14 I don't have the money to pay for Emily to do one. If we can
15 find someone that's cheaper that can do it that's approved by
16 the Court --

17 THE COURT: I'm wanting --

18 THE DEFENDANT: -- why can't we do --

19 THE COURT: -- to get you off of supervised visits.
20 So to get you off of supervised visits, yours is the most
21 important, sir.

22 THE DEFENDANT: Right. I --

23 THE COURT: Please.

24 THE DEFENDANT: -- also don't trust anyone that Ms.

1 Roberts is --

2 THE COURT: And I --

3 THE DEFENDANT: -- recommending.

4 THE COURT: You know what, I -- I don't think she's

5 the one who's recommending -- Ms. Roberts, and I don't think

6 she would have had -- have after a couple of other cases have

7 gone through since then. You know, she hasn't had that best

8 of luck with her all the time. I -- I've -- you know, so, you

9 know, she -- she's -- Dr. Holland is good and I think she can

10 do a good job. I think Dr. Paglini can do a good job. I know

11 he's not doing custody evals anymore. So if we do move

12 forward with the custody evaluation, it will wind up costing

13 more money.

14 THE DEFENDANT: Right. I mean, if I can request

15 that we have 24, 48 hours so I can get a list of three people

16 and they can pick one, I'm good with that.

17 THE COURT: I will --

18 THE DEFENDANT: I just don't --

19 THE COURT: I will -- you will have to reimburse

20 Emily for the additional monies that it's going to cost.

21 MS. ROBERTS: Your Honor, --

22 THE DEFENDANT: That's --

23 MS. ROBERTS: -- if Mr. Bellisario is looking for

24 someone on the Court's list that I've never dealt with, Mr.

1 Bellisario's going to be sadly mistaken.

2 THE COURT: I know.

3 MS. ROBERTS: I've dealt with every single one of
4 these people. So it doesn't matter who it is. Mr. Tilman
5 agreed to Donna -- or agreed to Dr. Holland. There's no basis
6 or request --

7 THE COURT: Well --

8 MS. ROBERTS: -- that's currently before the Court
9 to change Dr. Holland.

10 THE COURT: Well, he had -- there -- there's kind of
11 an oral request before the Court. So yes, it is before the
12 Court. And --

13 THE PLAINTIFF: I'd like to request --

14 THE COURT: -- you know, and we've had -- we've had
15 oral requests that -- that -- in which we have granted and
16 everything. Then --

17 MS. ROBERTS: Your Honor, I'm telling you right now
18 if it's one penny more than what Dr. Holland has suggested, my
19 client cannot afford it. We've already paid Dr. Holland
20 pursuant to your order.

21 THE COURT: I --

22 MS. ROBERTS: Mr. Bellisario didn't --

23 THE COURT: Ms. --

24 MS. ROBERTS: -- like that order.

1 THE COURT: Ms. --
2 MS. ROBERTS: Mr. Bellisario --
3 THE COURT: -- Roberts
4 MS. ROBERTS: -- should have sent something with the
5 Court.
6 THE COURT: I've already said that before. I will
7 change it. He would have to reimburse the full cost of what's
8 already been paid.
9 MS. ROBERTS: Right, but if it's more than -- okay.
10 Dr. Holland's, I think is 4,000. So if it comes back that
11 somebody else is 10,000 --
12 THE COURT: Oh, no.
13 MS. ROBERTS: -- which you and I --
14 THE COURT: No. No. No.
15 MS. ROBERTS: -- both know --
16 THE COURT: There better not be a \$10,000 one out
17 there. That's very excessive. The ones that the Court uses
18 is usually anywhere between 3,000 or \$4,000. So it's -- so
19 Mr. Bellisario, anything more -- any --
20 THE DEFENDANT: Yeah, that's fine.
21 THE COURT: -- anything more than that I'm not going
22 to allow that change whatsoever.
23 THE DEFENDANT: That's fine. Yeah.
24 THE PLAINTIFF: What about the money I've already

1 spent --

2 THE COURT: I -- I've --

3 THE PLAINTIFF: -- on Dr. Holland?

4 THE COURT: Just like I've said, I will require the
5 Defendant to reimburse you what you've already paid. He will
6 have to pay that portion of it.

7 THE PLAINTIFF: I just want this to end already. I
8 am --

9 THE COURT: I know you do.

10 THE PLAINTIFF: -- out of money.

11 THE COURT: I know you do --

12 THE PLAINTIFF: You know, I'm borrowing --

13 THE COURT: -- but I want this man to have a
14 relationship with these children. It's -- and --

15 THE PLAINTIFF: And so do I.

16 THE COURT: -- and if there's any way possible, it's
17 going to happen.

18 THE PLAINTIFF: Absolutely. And I just want them to
19 be safe as well, so --

20 THE COURT: I know it.

21 THE PLAINTIFF: -- I have complete (indiscernible)
22 in what you're doing.

23 THE COURT: Now, as soon -- as soon as we get this
24 thing here taken care of, we -- you know, the custody is the

1 big thing. We got to get that out of the way before we can
2 move forward and -- and get you all divorced. I mean, you all
3 are oil and water and it's horrible. Okay. So we're going --
4 you know --

5 MS. ROBERTS: Can I get clarification? He's going
6 to provide three names off the court list, the prior court
7 list, within how many hours? I mean, how long is this --

8 THE COURT: He asked for --

9 MS. ROBERTS: -- going to drag on?

10 THE COURT: He -- he asked for 48 hours. I want to
11 give him 48 hours. We're going to come back --

12 THE DEFENDANT: Yes.

13 THE COURT: When can we come back? Can we come back
14 Thursday? No, I've got trial all day Thursday.

15 THE DEFENDANT: And is it --

16 MS. ROBERTS: Can he just --

17 THE DEFENDANT: Is there a (indiscernible) --

18 MS. ROBERTS: -- file three names within 48 hours,
19 Your Honor, and then I can have until Monday so --

20 THE COURT: Yes.

21 MS. ROBERTS: -- he can have until -- given until
22 Friday at noon and then I can have Monday at noon.

23 THE COURT: Okay. We can do that. And we can come
24 back -- do I have anything Tuesday then, next Tuesday?

1 MS. ROBERTS: We don't need -- Your Honor, I don't
2 think we need to come back. It's just a waste -- I'm -- I'm
3 sorry but --

4 THE COURT: Okay.

5 MS. ROBERTS: -- but we can -- I'm not trying to be
6 -- if he has until noon on Friday to give me three names and
7 file it with the Court, if he fails to do it, it's Dr. Holland
8 and I have until Monday the 24th at noon, then that's
9 sufficient and he has to reimburse everything that she's paid
10 to Dr. Holland to date --

11 THE COURT: Correct.

12 MS. ROBERTS: -- before it moves forward, that's
13 fine.

14 THE COURT: Correct. And we need to -- I'll let Dr.
15 Holland put everything on hold so she is not using any more of
16 the monies that's been paid.

17 MS. ROBERTS: I will notify her --

18 THE DEFENDANT: And --

19 MS. ROBERTS: -- via email --

20 THE COURT: All right.

21 MS. ROBERTS: -- as soon as we're done with the
22 hearing, Your Honor.

23 THE DEFENDANT: Your Honor, is there --

24 MS. ROBERTS: And if he does --

1 THE DEFENDANT: -- is there a list that
2 MS. ROBERTS: For clarification, if he does not do
3 it by Friday at noon --
4 THE COURT: Yes.
5 MS. ROBERTS: -- or off the court -- prior court
6 list, it's going with Dr. Holland.
7 THE COURT: If he does not do it by -- by 5:00 p.m.
8 off the prior court list, Dr. Holland is the one.
9 MS. ROBERTS: Your Honor, not 5:00 p.m. We ask for
10 noon, because otherwise I won't be able to look at it before
11 Monday.
12 THE COURT: Okay. Noon.
13 MS. ROBERTS: That's why I said noon --
14 THE COURT: None.
15 MS. ROBERTS: -- noon is more than 48 hours.
16 THE COURT: Okay. You're right. Noon.
17 THE DEFENDANT: And what --
18 THE COURT: He asked for eight -- you asked for 48
19 and she's giving you 72 or plus. So we'll go to --
20 THE DEFENDANT: That's fine. Can someone send me
21 the court -- I -- I don't know where to find this court
22 listing.
23 THE COURT: Yeah, I will -- I will tell Marge to
24 send you -- hopefully, we can find that. You'll -- Mr. -- Mr.

1 Bellisario, you will also need to call around and make sure
2 they're still doing psych evals for the court, okay? There
3 is --

4 THE DEFENDANT: Okay.

5 THE COURT: Because there is a lot of people that
6 has dropped off in this here.

7 MS. ROBERTS: Your Honor, so you're entertaining
8 oral requests. Mr. Bellisario hasn't completed a work search
9 that you ordered. And we also -- just so the Court's aware,
10 we haven't been getting the SCRAM updates that the Court
11 ordered. You ordered those every two weeks and I'm asking the
12 Court to instruct Mr. Bellisario to follow that by Friday at
13 noon.

14 THE COURT: Okay. Follow that --

15 MS. ROBERTS: Both of those.

16 THE COURT: -- by Friday at noon, but Mr.
17 Bellisario, you get to remove the SCRAM. Okay? So give her
18 the final reports. The -- okay. The Chief Judge Bell has
19 denied the motion to have you disqualified. I am not able to
20 order her to do anything to reconsider it. So, you know, I'm
21 having to deny that. If she wants to -- if -- if she wants to
22 reconsider it, then you would need to file a motion for
23 reconsideration to her, but I believe you lost the period of
24 time there.

1 THE DEFENDANT: This is not a reconsideration
2 though. It's a motion for a leave to file a renewed.
3 THE COURT: Well --
4 THE DEFENDANT: Because I can't --
5 THE COURT: -- the current --
6 THE DEFENDANT: Any --
7 THE COURT: -- would need to be a motion for
8 reconsideration. And I don't -- you know, and I -- and I
9 really don't think it's going to do any good. I mean, they
10 don't disqualify a lot of people and there's just -- there --
11 that relationship is not there between Ms. -- me and Ms.
12 Roberts. And I know you want it to be, but it's not.
13 THE DEFENDANT: I believe it absolutely is, but
14 there is -- it's a renewed motion. It's not for
15 reconsideration. There's new issues that have come up that --
16 THE COURT: There has been --
17 THE DEFENDANT: -- are the reason --
18 THE COURT: -- no new motion -- there has been no new
19 issues. No. And I'm -- I'm going to deny that. I'm --
20 THE DEFENDANT: All right.
21 THE COURT: -- also going to lift the lis pendens
22 that is on the sole and separate home of the Plaintiff. There
23 is no need for a lis pendens to be on it. It is her sole and
24 separate property that was owned prior to the marriage.

1 THE DEFENDANT: How is it her sole and separate
2 property when I paid for it for the last six years?

3 THE COURT: The -- Ms. Roberts, what do you have to
4 say about that?

5 MS. ROBERTS: Your Honor, he can make an allegation
6 under potentially Malmquist or for reimbursement of it, but he
7 would have to do the work regarding that. He hasn't. If the
8 Court does not lift the lis pendens and permit my client to
9 refinance, I will not be able to stay. As we've explained to
10 the Court, my client has gone through \$26,000 in 30 days in
11 attorney's fees because we have been served with motion after
12 motion after motion that I have to respond to, Your Honor.
13 That's part of the vexatious litigation request.

14 So unless the Court can -- can -- either way, Your
15 Honor, she owes me thousands and thousands of dollars. Mr.
16 Bellisario is not paying his court ordered child support, his
17 court ordered support. The Court won't reduce the --

18 THE COURT: I know.

19 MS. ROBERTS: -- arrears to judgment which were
20 previously ordered. All --

21 THE COURT: Oh, by the way --

22 MS. ROBERTS: -- I had to do was file the
23 schedule --

24 THE COURT: You file me a schedule of arrears. He's

1 been ordered --

2 MS. ROBERTS: We already did, Your Honor.

3 THE COURT: -- to pay it. It's not been changed.

4 Huh?

5 MS. ROBERTS: We already filed the schedule of
6 arrears.

7 THE COURT: I did not see it. When was it filed?

8 THE DEFENDANT: And you already did this. You said
9 it would be held over till trial.

10 MS. ROBERTS: I have to -- hold on, Your Honor. I
11 have to pull it up.

12 THE DEFENDANT: If she left the house --

13 THE COURT: Hold on, Mr. Bellisario. I -- I need --
14 I need to see when it was done so that I can, you know, go
15 through there. I don't remember, I really don't. So let me
16 see the date and then that will help. I can go back and take
17 a look at the record.

18 MS. ROBERTS: February 5th of -- February 5th of
19 2021, Your Honor, was the child support and the -- it was
20 filed and served both the child support as one and the
21 temporary support as another. So he owed --

22 THE COURT: February 5th? I didn't have anything on
23 calendar on February 5th, 2021.

24 MS. ROBERTS: Right, Your Honor. Judge Pomrenze

1 told us to file them before you took the bench. And if you
2 recall, we had five months where we did not have a judge in
3 truth case. So we continued to comply with the court orders
4 during that period. This is when Mr. Bellisario was filing
5 his motions to disqualify --

6 THE COURT: So was that --

7 MS. ROBERTS: -- you.

8 THE COURT: -- when we come in and got April 26th?
9 Was this -- the -- what was it, the April -- was this one of
10 those April 26th?

11 MS. ROBERTS: Hold on, Your Honor. I can tell you
12 if you wait just one second.

13 THE COURT: Because I still have my notes from that.
14 I've --

15 THE DEFENDANT: Yeah, it was --

16 THE COURT: I've got them right --

17 THE DEFENDANT: -- April 26th?

18 THE COURT: It was April 26th?

19 THE DEFENDANT: It was April 6th, I think, or
20 whenever we were in court last.

21 THE COURT: Okay.

22 MS. ROBERTS: I think it was -- April -- it was for
23 the April 6th hearing, Your Honor, I believe. But there's so
24 much going on in this case.

1 THE COURT: There is. There is. But fortunately
2 guess what? I'm a packrat when it comes to notes. Motion to
3 extend, joining the business, appointment of receiver,
4 vexatious litigant, con -- consolidating civil, modification
5 of legal custody, modification of visitation, mental health,
6 OSC, reduce child support arrears to judgment. I act -- I
7 actually have something here that says yes.

8 MS. ROBERTS: You deferred it till trial and told us
9 you weren't going to -- you were going to continue the
10 obligation for support but you were deferring the child
11 support, the --

12 THE COURT: And the --

13 MS. ROBERTS: -- temporary --

14 THE COURT: -- spousal support.

15 MS. ROBERTS: -- support and the attorney's fees to
16 trial. So it's leaving her with -- I mean, if she doesn't
17 refinance, Your Honor, she's not going to have Counsel.

18 THE COURT: Okay.

19 MS. ROBERTS: I can't --

20 THE COURT: Up to the -- the February 5th motion, I
21 will grant that on arrears. I am going to leave it on the
22 table to have it amended at -- you know, from February on. So
23 let's go to January. We -- we will do that. Mr. Bellisario,
24 how are you paying your rent?

1 THE DEFENDANT: Well, I don't have any
2 (indiscernible).
3 THE COURT: What was that, sir?
4 THE DEFENDANT: I don't have rent currently.
5 THE COURT: Okay. Why not?
6 THE DEFENDANT: Because I'm living with someone.
7 THE COURT: Okay. Who are you living with?
8 THE DEFENDANT: My girlfriend.
9 THE COURT: Cool. Okay. I'm not going to ask any
10 further because it's nobody else's business who your
11 girlfriend is. All right. The --
12 MS. ROBERTS: Your Honor, you said that -- you said
13 that the SCRAM he's going to give us the last report by Friday
14 at --
15 THE COURT: Yeah, he's going --
16 MS. ROBERTS: -- noon, his work --
17 THE COURT: -- to give you the last report --
18 MS. ROBERTS: -- search that he hasn't done since
19 April. Can I have that Friday at noon as well?
20 THE COURT: Yeah.
21 THE DEFENDANT: What?
22 THE COURT: What was that?
23 THE DEFENDANT: I'm sorry?
24 THE COURT: So that he knows what he's got to do by

1 Friday.

2 MS. ROBERTS: Okay. The work search by Friday from
3 -- from April --

4 THE COURT: Correct.

5 MS. ROBERTS: -- till now and the last SCRAM report
6 and then the three names by Friday at noon. Those --

7 THE COURT: Correct.

8 MS. ROBERTS: -- are the three things due Friday at
9 noon.

10 THE COURT: That is correct. We -- and we are going
11 to go ahead and we're going to lift the lis pendens. Mr.
12 Bellisario, you may have a Malmquist argument. So that part
13 is not off the table. And if we wind up having to -- to get
14 you reimbursed from all the properties that she should have
15 had from, you know, what you had there, then fine, but you --
16 you know, if you were making payments towards that house for
17 six years, then yes, you do -- you do have a Malmquist
18 argument, okay?

19 THE DEFENDANT: Right. So how are we allowing her
20 to go refinance and take money out of the house when we don't
21 know what is owed to who and we don't know any of that?
22 Because she has --

23 THE COURT: Because I --

24 THE DEFENDANT: -- no (indiscernible) --

1 THE COURT: Mr. Bellisario, maybe if you had not
2 taken all these steps here to make sure that you no longer
3 have a practice and paying your spousal support and your child
4 support, she wouldn't need to be doing it. If you were
5 following --

6 THE DEFENDANT: (Indiscernible) --

7 THE COURT: -- orders, I would not need to be making
8 this order. So I'm making this order because of your bad
9 acts. The sooner --

10 THE DEFENDANT: How is it my --

11 THE COURT: -- that we get this case moving the
12 proper way, the better off we're going to be. Start
13 cooperating so we can get it done.

14 THE DEFENDANT: Start acting in a manner of a judge
15 and I will. Do things by law --

16 THE COURT: No. You know what --

17 THE DEFENDANT: -- and by law.

18 THE COURT: -- you didn't do it for Judge Pomrenze
19 either. So don't make promises you can't keep.

20 MS. ROBERTS: So Your Honor, just one --

21 THE DEFENDANT: (Indiscernible) --

22 MS. ROBERTS: -- clear on this issue. Your order to
23 lift the lis pendens is granted and then the request for her
24 to be able to refinance is granted.

1 THE COURT: That is correct. But she is not to take
2 all the equity out of the house. He has a --
3 MS. ROBERTS: That's fine.
4 THE COURT: -- Malmqui -- he has a Malmquist
5 argument. So if he's going to have a right to reimbursement,
6 I want to make sure there's money there for him to get the
7 reimbursement. Okay?
8 MS. ROBERTS: Okay.
9 THE PLAINTIFF: Your Honor.
10 THE COURT: Yes, ma'am?
11 THE DEFENDANT: Can we get a copy --
12 THE PLAINTIFF: Can we please deem him a vexatious
13 litigant?
14 MS. ROBERTS: Okay. Emily, stop. Can you just
15 stop? We're going through them one at a time.
16 THE PLAINTIFF: Okay.
17 THE COURT: When it come -- okay. Right now, he --
18 he -- most of his -- even though he files a lot of stuff in
19 this hearing which we have properly discussed in the past, he
20 does have some stuff in each one of them that he has a right
21 to be asking questions too. So I'm not going to deem him a
22 vexatious litigant, but Ms. Roberts, you know what, in these
23 areas where we've already discussed it, just put in there
24 please see opposition such and such or motion such and such.

1 Okay? I --
2 MS. ROBERTS: Your Honor --
3 THE COURT: -- am not going to --
4 MS. ROBERTS: -- can I ask this?
5 THE COURT: -- have you redo it.
6 MS. ROBERTS: Rather then -- Your Honor, rather then
7 me do that, could the Court just rule on it pursuant to EDCR 1
8 before --
9 THE COURT: Hey's --
10 MS. ROBERTS: -- I even have to file --
11 THE COURT: I -- I --
12 MS. ROBERTS: -- an opposition?
13 THE COURT: -- see -- I see other stuff there in
14 which he does have a right to bring a motion. He's not at the
15 vexatious litigant yet. He's not there yet. He's getting
16 very close, very close to being there. But he's --
17 MS. ROBERTS: Okay.
18 THE COURT: -- not quite there yet.
19 THE PLAINTIFF: Please.
20 MS. ROBERTS: (Indiscernible) leave then, Your
21 Honor, (indiscernible) pursuant to the Court's order from
22 April, I noticed Mr. Bellisario on May 12th with the names of
23 three receivers and three CPAs. Those people, he has not
24 responded, so you said you would pick the middle person. That

1 would be Dan Marks as the receiver and Bo (ph) Johnson as the
2 CPA.

3 THE COURT: Sounds good.

4 MS. ROBERTS: Okay. I'll do that in the order.

5 THE COURT: All right. He didn't choose one. So
6 those were the middle two.

7 MS. ROBERTS: That's correct, Your Honor. The Court
8 -- Your Honor, I know that you want to go before the Discovery
9 Commissioner on some of this, but the subpoenas that we -- oh,
10 nevermind, Your Honor. The subpoenas -- the -- until -- the
11 receivers cannot and the CPA cannot do their job until we get
12 the records via subpoena which is why that was already before
13 you.

14 THE COURT: Yeah.

15 MS. ROBERTS: So -- but the other -- that's already
16 resolved.

17 THE COURT: Okay.

18 MS. ROBERTS: The motion is --

19 THE COURT: All right.

20 MS. ROBERTS: -- mine before --

21 THE COURT: The --

22 MS. ROBERTS: That's fine.

23 THE COURT: -- motion for reconsideration as it
24 pertains to an order against domestic violence is going to

1 stand. We've got a criminal case that's coming up. Let's see
2 what happens in that criminal case. I believe it goes to
3 trial in July. So we're going to see what happens in July.

4 MS. ROBERTS: And then the order from -- I think the
5 only last issue is from January 25th. He wants to reconsider
6 that order. There was nothing that happened at that hearing,
7 Your Honor. You simply just gave another date.

8 THE COURT: I -- that's -- that's what I was
9 thinking. I'm like I don't remember anything on January 25th.
10 Let me double check and make sure.

11 THE DEFENDANT: What is --

12 MS. ROBERTS: That's --

13 THE COURT: I --

14 MS. ROBERTS: -- fine, Your Honor.

15 THE DEFENDANT: The minutes are different from what
16 she put in the order. The issue is you're saying it's a
17 completely procedural thing which you don't need an order for.
18 She didn't get a judgment. She wasn't told to file an order.
19 She just wrote an order that's not going to include what was
20 in the minutes to change what it looks like happened.

21 THE COURT: January 25th -- or no, that was the
22 order you filed, correct?

23 MS. ROBERTS: The hearing date was January 25th,
24 Your Honor.

1 THE COURT: I had a trial January 25th.

2 MS. ROBERTS: I believe we -- let me look. Hold on,
3 Your Honor. If the Court can bear with me just one second.
4 Oh, heck.

5 THE DEFENDANT: I mean, you're not going to do it
6 anyways. Just deny it and I don't care.

7 THE COURT: I'm trying to find out what it was, sir.
8 But I do believe that the motion for reconsideration is
9 untimely. It depends on when it was filed. And I'm just --

10 THE DEFENDANT: No.

11 MS. ROBERTS: The January 25th hearing occurred at
12 9:00 o'clock in the morning, Your Honor. You simply said that
13 the motions scheduled on that date would be heard on March
14 1st. That's all you said. You said it should be stand.
15 That's it. The minutes are not always right. The video
16 record is actually controlling. Mr. Bellisario wants it to be
17 exactly from the minutes. That was filed --

18 THE COURT: It -- yeah.

19 MS. ROBERTS: -- and that's all (indiscernible).

20 THE COURT: It cannot -- it can't come from the
21 minutes because the minutes are not always controlling. And
22 the video record is what needs to be put in place. So yeah.
23 I'm going to deny that, Mr. Bellisario. Okay. I -- I believe
24 we've got it all covered. Mr. Bellisario.

1 MS. ROBERTS: Your Honor, again --

2 THE COURT: Yeah?

3 MS. ROBERTS: So we have made repeated requests for
4 attorney fees. The Court has completely deferred that. Mr.
5 Bellisario somehow is paying expenses, Your Honor. And my
6 client is still not --

7 THE COURT: Well --

8 MS. ROBERTS: -- receiving child --

9 THE COURT: -- it sounds like he's living with
10 somebody right now is how he's paying some -- some expenses.
11 I don't know -- you know, I don't know if they're giving it to
12 her. I mean, I can make -- I can make an order, but I have no
13 idea where you're going to get it. How are you going to get
14 the money? So we're going to defer it until we can figure out
15 what's going on. I have no other choice right now. There's
16 no place to get it from until we know if there is anything
17 there. Well, it's just going to be another judgment, no way
18 of collecting.

19 MS. ROBERTS: So, Your Honor, then as it rel --
20 okay. That's fine. Okay. Can you give us -- so can you give
21 us a return date on the psychological evaluation in about 90
22 days so we can keep moving on that issue?

23 THE COURT: We're going to have to do a hundred and
24 twenty days because I do know that Dr. Holland is kind of

1 backed up with a lot of stuff. So it's going to have to be a
2 hundred and twenty days on that one. The --

3 THE DEFENDANT: Your Honor --

4 MS. ROBERTS: Okay. Fine, Your Honor.

5 THE COURT: Huh?

6 THE DEFENDANT: I'm sorry. Since you -- since you
7 said I do have equity in the house, I will have some, you
8 know, compensation from that?

9 THE COURT: Well --

10 THE DEFENDANT: Can we --

11 THE COURT: -- what I --

12 THE DEFENDANT: Can --

13 THE COURT: Well, that's a trial issue, sir. And,
14 you know, with all the --

15 THE DEFENDANT: (Indiscernible) --

16 THE COURT: -- with all the spousal support and
17 child support and, you know, whatever is going on with your or
18 business and all this other stuff, you know, we've -- we've
19 got to see what's going to be there. But if it's --

20 THE DEFENDANT: Then we have --

21 THE COURT: You know, if we can find the assets and
22 you'll have some money coming back. But if you --

23 THE DEFENDANT: Then I --

24 THE COURT: -- owe money, then no. You're --

1 there's not going to be any money --
2 THE DEFENDANT: Well --
3 THE COURT: -- there. Property don't work where
4 each individual one you get half of it and then move on to the
5 next. It's all lumped in and we go from there.
6 THE DEFENDANT: All right. Well, can she take out
7 money with the refinance to pay for her psych eval as well?
8 Because I don't have money to give her a psych eval.
9 THE PLAINTIFF: He has the money to pay for his
10 criminal attorney. How does he not have the money to pay for
11 anything else? His criminal attorney is Goodman. It's --
12 THE COURT: Yeah.
13 THE PLAINTIFF: -- a very expensive --
14 THE COURT: I mean --
15 THE PLAINTIFF: -- attorney
16 THE COURT: -- if you can -- if you can afford a
17 criminal attorney, you can afford a psych eval for her.
18 THE DEFENDANT: And that's based on what? My FDF
19 says I don't make any money because I don't.
20 THE COURT: Well, you're -- you're paying a criminal
21 defense attorney, sir. You're coming up --
22 THE DEFENDANT: I --
23 THE COURT: -- with money somehow or another.
24 You've got it put somewhere. So --

1 THE DEFENDANT: I'm sorry, what? (Indiscernible)?
2 THE COURT: So, I mean, I would like to know how you
3 are paying for it, but, you know, I -- you know, that's not my
4 job. You know, if you're not -- if you're not willing to tell
5 me, then, you know, I'm -- I'm not going to harp on --
6 THE DEFENDANT: I told you --
7 THE COURT: -- anyone.
8 THE DEFENDANT: -- my parents paid it.
9 THE COURT: What was it, sir?
10 THE DEFENDANT: I told you, my parents paid it.
11 THE COURT: No, that's good.
12 THE DEFENDANT: I mean, how --
13 THE COURT: Anyway --
14 THE DEFENDANT: -- (indiscernible) --
15 THE COURT: Ms. Roberts, can you pre -- can you
16 prepare the order? Give Mr. Bellisario --
17 THE PLAINTIFF: And I submitted --
18 THE COURT: -- an opportunity to approve it.
19 MS. ROBERTS: Fine, Your Honor. But can you give us
20 that return hearing date?
21 THE COURT: Oh, yes. September 16th at 9:00 a.m.
22 And if she can get it done sooner, let me know and we can move
23 it forward because I really do want to try to get this -- I
24 really do want to get this moving.

1 THE PLAINTIFF: Your Honor --
2 THE COURT: Yes, ma'am?
3 THE PLAINTIFF: -- I can't afford to pay \$26,000 a
4 month in attorney's fees. I am up to my eyeballs in debt.
5 They're -- he has to be deemed --
6 THE COURT: Ms. Bellisario --
7 THE PLAINTIFF: -- a vexatious litigant.
8 THE COURT: -- no. And I -- I can't. As long as
9 there is some reason why he's asking -- and it's a logical
10 reason, I am not. He had a right to ask to remove the SCRAM
11 since he's -- since -- since it's come back negative for seven
12 months now. You know, I mean, I understand how frustrated you
13 are and I understand you're up to your eyeballs in debt, but
14 there is -- you know, right now as long as he's got reasons to
15 bring it, I am going to allow him to hear it. But Mr.
16 Bellisario, you're very quickly approaching the vexatious
17 litigant. Very quickly. Okay?
18 THE PLAINTIFF: \$26,000 in one month.
19 THE DEFENDANT: (Indiscernible).
20 THE COURT: One more -- one more motion that I keep
21 having to argue -- argue with you on and order the same thing
22 and point out the same thing and it's -- then it's -- we're
23 there.
24 THE DEFENDANT: That's fine. I'll appeal it because

1 every motion I brought has merit. It doesn't matter if you
2 deny it. It's -- it has merit. That's why the last one's
3 going up to appeal right now. So that's fine.

4 THE PLAINTIFF: I am a single mom with no child
5 support. How am I going to pay \$26,000? I'm on welfare right
6 now to give my kids food. \$26,000 in one month is my
7 attorney's --

8 THE COURT: I'm sorry --

9 THE PLAINTIFF: -- bills.

10 THE COURT: -- Ms. Bellisario.

11 THE PLAINTIFF: That is (indiscernible) --

12 THE COURT: And he is right. As long as there's
13 something there, even if I deny it, he has a right to do it.
14 So, you know, I've -- I'm understanding the circumstances.
15 Ms. Roberts, you know, I realize you've got a job and you do
16 it to the best of your ability to do. But there comes a time
17 to where it just you -- you don't necessarily have to do it to
18 the best.

19 MS. ROBERTS: Your Honor, then that -- I -- I mean,
20 with all due respect, Your Honor, just to make a record, that
21 opens me up to malpractice claims.

22 THE COURT: I know it does.

23 MS. ROBERTS: Mr. Bellisario has already filed
24 claims against me that are requiring me to invoke my

1 malpractice carrier.

2 THE COURT: I know.

3 MS. ROBERTS: So with all due --

4 THE COURT: I know.

5 MS. ROBERTS: -- respect to the Court, I -- I don't
6 have that opportunity -- opportunity and neither does my
7 client. We have to -- as Mr. Bellisario says, he's appealing
8 and appealing. In fact, I got served with another motion this
9 morning by Mr. Bellisario. So it's not a situation where I
10 can simply say refer to this, Your Honor, because the Supreme
11 -- the Court knows the Supreme Court is not going to accept
12 that.

13 THE COURT: Okay.

14 MS. ROBERTS: So --


15 THE COURT: Mr. Bellisario, cut it out, because
16 you're about to get put on a list.

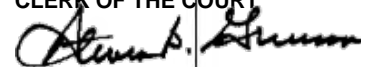
17 THE DEFENDANT: I have rights.

18 THE COURT: And that's going to -- and that's going
19 to be in every court.

20 THE DEFENDANT: I have rights. I have rights.
21 That's all I'm going to say.

22 THE COURT: You -- yes, you do have rights but you
23 don't have the right to keep litigating this and litigating
24 and litigating when --

1 THE DEFENDANT: (Indiscernible) --
2 THE COURT: Let me --
3 THE DEFENDANT: -- supposed to be a litigious --
4 THE COURT: Let me put it to you this way, sir.
5 Until you get the psych eval, I really don't want to see you
6 back here unless it's to enforce something, okay?
7 THE DEFENDANT: Yeah, that's fine.
8 THE COURT: Thank you.
9 THE DEFENDANT: Yeah.
10 THE COURT: All right. Ms. Roberts, prepare the
11 order.
12 THE DEFENDANT: Thank you.
13 MS. ROBERTS: Thank you.
14 (PROCEEDINGS CONCLUDED AT 12:31:37)
15 * * * * *
16 ATTEST: I do hereby certify that I have truly and
17 correctly transcribed the digital proceedings in the above-
18 entitled case to the best of my ability.
19
20 
21 _____
22 Adrian N. Medrano
23
24



1 **MOT**

2 BRADLEY J. BELLISARIO
3 Nevada Bar No. 13452
4 7100 Grand Montecito Pkwy, #2054
5 Las Vegas, NV 89149
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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

**MOTION FOR ORDER PURSUANT TO
NRS 200.359 (PARENTAL KIDNAPPING
BY PLAINTIFF)**

HEARING REQUESTED

15 NOTICE! YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION
16 WITH THE CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH A
17 COPY OF YOUR RESPONSE WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF
18 THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE
19 COURT WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION MAY
20 RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT
21 HEARING PRIOR TO THE SCHEDULED HEARING.

22 Defendant, Bradley Bellisario, *pro se*, moves this Honorable Court for the following relief:

- 23 1. For an Order Declaring Nevada the home state of the minor children to wit; Brayden
24 Bellisario, Blake Bellisario, and Brooklyn Bellisario;
- 25 2. For an Order stating that there is cause to believe that the entry of a court order in a civil
26 proceeding, including D-20-605263-D, will not be effective to enforce the rights of the
27 parties and would not be in the best interests of the minor children.
- 28 3. For such other and further relief as the Court deems just and equitable.

MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
REQUESTED - 1

1 This Motion is made and based upon all the papers and pleadings on file herein and the
2 affidavit included herewith and is made in good faith and not to delay justice.

3
4 DATED this 18TH day of May 2021.

5 /s/ Bradley Bellisario
6 Bradley Bellisario
7 7100 Grand Montecito Pkwy, #2054
8 Las Vegas, NV 89149
9 T: 702.936.4800
F: 702.936.4801
E: bradb@bellisariolaw.com
10 *Defendant Pro Se*

11
12 **POINTS AND AUTHORITIES**

13
14 **I.**
STATEMENT OF FACTS

15 Defendant has always had a very close relationship with all three (3) minor children.
16 Defendant was the parent who woke up with them at 6 a.m. every morning. Defendant was the
17 parent that made them breakfast every day. Defendant was the parent who dressed the kids for
18 school. When Defendant needed to leave for work at 9 a.m. Defendant had an illegal alien
19 housekeeper show up to watch the kids that weren't in school. At noon Plaintiff would pick up
20 the kids from school, give them lunch, and put the kids down for a nap. Plaintiff as well would
21 take a nap with the children every day. The kids would wake up around 3 and the housekeep
22 would leave around 4 or 5 pm. Defendant would come home from work around 5:30 and at that
23 time Plaintiff considered her day done. Defendant would prepare dinner or pick-up take-out food.
24 Defendant would give the kids a bath and get them ready for bed. Defendant would then spend
25
26
27

28 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
REQUESTED - 2

1 an hour cleaning up the kitchen and first floor of the house while Plaintiff laid in bed or on the
2 couch texting. Defendant was always very active in taking care of the three (3) minor children.

3 After the incident on September 17, 2019 Plaintiff bought several burner phones in order
4 to contact Defendant. Plaintiff on multiple occasions stated that the kids wanted to see Defendant
5 badly, including Brayden Bellisario. At hearing during the J-Case, the child advocate attorney
6 stated that "Brayden wants to see his Dad." After that time Emily began engaging in a course of
7 conduct to mentally abuse the minor children, in particular Brayden Bellisario, through parental
8 alienation. Emily began seeking a beneficial therapist report regarding Brayden Bellisario and
9 took him to a series of therapists in order to get a result she desired.
10

11 On or around the beginning of October 2019 Emily took the parties' minor son to FirstMed
12 for a therapist evaluation. Plaintiff took the parties' minor son to FirstMed on one occasion,
13 however, after assessment, it was determined that "no services were needed," according to
14 Bethany Andis of Child Protective Services. (See Texts from Bethany Andis, attached hereto as
15 Exhibit A).
16

17 Plaintiff then waited several months before claiming that the parties' minor son needed
18 services again. Plaintiff, without notice to Defendant or CPS (who had legal custody of the child
19 at the time), took Brayden to All About You Counseling on or around January 6, 2020. Defendant
20 found out about the visit to All About You Counseling, despite Plaintiff refusing to tell Defendant
21 if, and to where, Plaintiff took their minor son for "treatment." Eventually, Defendant found the
22 therapist and requested records. The All About You Counseling assessment was full of "mom
23 reports" regarding much of the information. The therapist specifically stated they needed to
24 contact Defendant to get information before proceeding with services, however, Defendant was
25 never contacted.
26

27
28 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
REQUESTED - 3

1 Months later, Plaintiff then took the parties' minor son to Donna Wilburn, claiming that
2 Brayden had anxiety and needed therapist treatment. Plaintiff only informed Defendant of the
3 therapist visit the day of the appointment, even giving Defendant an incorrect time to ensure
4 Defendant would not be at the appointment. However, Plaintiff did ensure to inform Defendant
5 that he needed to pay for the services. Defendant rushed to the appointment to meet the therapist
6 and made it in time for the last several minutes. Defendant was introduced to the therapist and
7 Ms. Wilburn set up a follow-up appointment for Defendant to give information and explain
8 services. Defendant attended that session and a follow-up session with Defendant and Defendants'
9 minor son. However, two (2) weeks after, and approximately one (1) hour after Plaintiff met with
10 Donna Wilburn, Donna sent an email to the parties stating that the parties should abide by certain
11 recommendations. Included in said recommendations was a custody recommendation which
12 Plaintiff and Donna Wilburn discussed during their final session with the parties' minor son.
13 Defendant terminated Donna Wilburn's services as she was acting as an advocate for Plaintiff,
14 not a child therapist, and she had exceeded her scope of employment. Defendant requested
15 records and videos from Ms. Wilburn who made numerous excuses for failing to disclose any
16 information. Upon information and belief, Ms. Wilburn then referred Plaintiff to her current
17 attorney, Ms. Amanda Roberts. Ms. Roberts, her husband Jason Stoffel, and Ms. Wilburn are
18 friends and maintain an inappropriate referral relationship. Ms. Wilburn was ultimately sued by
19 Defendant for malpractice, among other causes of action.

20 After Ms. Wilburn was terminated on February 25, 2020 Plaintiff did not seek immediate
21 therapy care for the parties' minor son. However, Plaintiff did state on April 19, 2020 that "the
22 therapist is actually in the process of writing her assessment you will see everything once my
23 attorney responds." (See Our Family Wizard messages, attached hereto as exhibit C). Plaintiff
24 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
25 REQUESTED - 4

1 was referencing Donna Wilburn as Ms. Wilburn would not release the medical records and was
2 apparently attempting to write an expert report which would have been entirely inappropriate.
3 Several days later on April 24, 2020 Plaintiff contacted Defendant regarding a new therapist for
4 the parties' minor son. Plaintiff stated;

5
6 "[t]hese are the two therapist that have gotten back to me, Cindy
7 Osborn & Anna Trujillo they have availability as early as this
8 Monday the 26th. Please let me know which of these you agree to
9 let Brayden to be seen by. I'd like to have him start going asap."
(See Our Family Wizard messages, attached hereto as Exhibit C)

10 Defendant replied;

11 "I will not accept either. We should both research a therapist then
12 email only communication to them with both attached when we've
13 agreed on one. Both of us need to be included with every
14 communication. And that needs to be spelled out with the therapist.
15 I will not have a repeat of Donna. You have been shopping Brayden
around trying to get the result you want. We need someone that has
not had an ex-parte communication with either of us." (See Our
Family Wizard messages, attached hereto as Exhibit C)

16 Plaintiff continued to talk about a therapist for the parties' minor son and specifically
17 stated that she would simply ask the Judge to appoint a therapist. On April 26, 2020 Plaintiff sent
18 Defendant a message on Our Family Wizard stating, "I have never spoken to Anna Trujillo can
19 you give me a reason why you are opposed to her?" (See Our Family Wizard messages, attached
20 hereto as Exhibit D). Defendant replied "[y]our message you sent me said here's two names of
21 people that have gotten back to me. I'm not sending Brayden to anyone you've had prior contact
22 with. Next." (See Our Family Wizard messages, attached hereto as Exhibit D). Upon information
23 and belief, Plaintiff already had an appointment scheduled with Anna Trujillo as Plaintiff took
24 Brayden for "treatment" with Anna Trujillo on April 27, 2020 with knowledge that Defendant
25 objected to the choice of therapist. On May 22, 2020 without prior notice to Defendant, Plaintiff

26
27
28 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
REQUESTED - 5

1 states that "Brayden has been seen by the therapist, and we have had a discussion with the
2 therapist regarding you having overnights." (See Our Family Wizard Messages, attached hereto
3 as Exhibit E).

4 On June 10, 2020 Plaintiff and Plaintiff's Counsel finalized negotiations with Defendant
5 and Defendant's Counsel regarding a stipulation and order addressing various issues. Among
6 those issues was the hot topic of a child therapist. The Stipulation and Order specifically states
7 that "THE PARTIES STIPULATE AND AGREE that Brayden shall be enrolled in therapy with
8 a neutral therapist, and it must be someone other than Donna Wilburn." (See Stipulation and
9 Order, attached hereto as Exhibit F).

10 After June 10, 2020 Defendant did not hear another peep from Plaintiff regarding a child
11 therapist other than Nicolas Ponzo, who the parties agreed to for reunification therapy. It wasn't
12 until October 22, 2020 at the parties' return hearing that Defendant was informed of the non-
13 neutral therapist treatment when Ms. Roberts stated the therapist, who was secretly "treating"
14 Brayden, attempted to contact Dr. Ponzo in an attempt to influence him.

15 Defendant then contacted Anna Trujillo regarding a copy of records. Ms. Trujillo
16 attempted to dodge the request, but ultimately gave Defendant medical records, partial billing,
17 and partial intake records. To Defendant's surprise, Plaintiff had the parties' minor son "treating"
18 with Anna Trujillo since April 27, 2020 despite Defendant's adamant stance that Ms. Trujillo was
19 not an appropriate or neutral therapist. Ms. Trujillo's employment was especially surprising to
20 Defendant as Plaintiff and Plaintiff's Counsel had represented from April 27, 2020, through the
21 negotiations regarding the June 10, 2020 stipulation and order, that Brayden was not treating with
22 a therapist. Incredibly, it gets better! Not only did Plaintiff take Brayden to Anna Trujillo for
23 initial assessment the day after Defendant specifically rejected Ms. Trujillo as a therapist, Plaintiff
24 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
25 REQUESTED - 6

1 lied on the informed consent form Plaintiff filled out for Ms. Trujillo's services. On the informed
2 consent form Plaintiff replied "Yes" to the question "Do both parents provide consent for
3 treatment?" Clearly Plaintiff knew Defendant did not consent to "treatment" as Defendant had
4 vehemently denied Ms. Trujillo as a service provider less than 24 hours prior.
5

6 The parties agreed on Nicolas Ponzo as a reunification therapist for Brayden and
7 Defendant. After multiple sessions and a thorough workup, Dr. Nicolas Ponzo prepared a
8 reunification report for this Court. (Attached hereto as Exhibit F). Specifically, Dr. Ponzo found:
9

10 "The child expressed eagerness to visit with his father and
11 demonstrated an enthusiastic and positive response to the premise
12 of further contact..."

13 "The child expressed a preference to increase contact time with his
14 father. The child continued to demonstrate comfort consistently
15 throughout visits in this office and demonstrated no inhibition or
16 lack of trust in his father's ability for care and attention. The child
17 expressed future oriented ideas and plans for engaging in activity
18 with his father and outlined a desire to play, go on trips, and go
19 fishing with his father."

20 "The child discussed feeling close and wanting to see his father more.
21 It is important to note that the child cautioned this clinician to not
22 tell his mother that he feels close and wants to see his father."

23 "The child stated that he does not want his mother to know that he
24 regards his father in a positive way and that he cares for his father
25 and wants to maintain a relationship."

26 "The child stated that his mother is critical of his father and reported
27 that his mother will be angry and upset by his love and desire to see
28 and maintain a relationship with his father."

"There is an apparent issue with the child's exposure to conflict and
the mother's views and attitudes about his father. The child clearly
demonstrated that he has knowledge of the mothers' negative
attitudes and perceptions of his father and the mother's
protectiveness to the extent of creating and maintaining separation."

"The child is demonstrating anxiety and preoccupation with
maintaining a secret and the effects of triangulation in which he is

1 aware that his mother would be upset with his love and desire for
2 his father to be in his life. This is one of the most important findings
3 in this evaluation of reunification issues.”

4 **“According to content from child interviews and disclosures by**
5 **the child, the child has developed reservations and been**
6 **triangulated into parent issues through exposure to the mother’s**
7 **attitudes about his father. It is important that the mother**
8 **recognizes that this is stressful and has a detrimental impact on**
9 **the child’s emotional and psychological development.”**

10 “This can lead to deterioration of the relationship and onset or
11 perpetuation of alienation dynamics that have a detrimental impact
12 on the child’s emotional development.”

13 Dr. Ponzo specifically found that Defendant and Brayden had a close relationship with
14 each other. Further, Dr. Ponzo found that Brayden’s anxiety was caused by Emily’s insistence in
15 triangulating Brayden with negative information regarding his Father. Dr. Ponzo specifically
16 found that if Emily continued her actions, it would lead to onset or perpetuation of alienation
17 dynamics that have a detrimental impact on Brayden’s emotional development.

18 Since the time of Dr. Nicolas Ponzo’s report, Emily has continued her alienating behavior,
19 withholding visitation, negatively remarking about Defendant to his minor children, and using
20 the children as a weapon in court. Emily’s actions are consistent with what any therapist worth
21 their salt would consider parental alienation.

22 **II.** **LEGAL ARGUMENT**

23 This Court is supposed to be making decisions with the paramount concern being the best
24 interest of the children. However, Judge Mary Perry has made every decision with the concern
25 of what’s in the best interest of her close personal friend, Amanda Roberts, Esq., Counsel for
26 Plaintiff. Judge Perry has repeatedly refused to consider relevant evidence, and simply relies on

27 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
28 REQUESTED - 8

1 the allegations propounded by her close, personal friend, Amanda Roberts, Esq., who has proven
2 time and time again to blatantly lie to the Court. Case in point, on April 6, 2021 Judge Mary
3 Perry Ordered to modify physical custody (reducing Defendant's visitation) and grant Plaintiff
4 primary legal custody (never heard of it in the state of Nevada) all while specifically stating she
5 made no finding of fact. Therefore, since it wasn't based on fact, her Orders must have only been
6 based on her close, personal relationship with Amanda Roberts, Esq. who Judge Perry admittedly
7 claimed is one of her "favorite people" and who she finds "so special" to Judge Perry. It's time
8 that the withholding of child custody, parental alienation by Plaintiff, and child abuse inflicted by
9 Plaintiff is taken out of Judge Mary Perry's hands and put in the hands of the Las Vegas
10 Metropolitan Police Department.
11

12
13 "A person having a limited right of custody to a child by operation of law or pursuant to
14 an order, judgment or decree of any court, including a judgment or decree which grants another
15 person rights to custody or visitation of the child, or any parent having no right of the custody to
16 the child who (a) [i]n violation of an order, judgment or decree of any court willfully detains,
17 conceals or removes the child from a parent, guardian or other person having lawful custody or a
18 right of visitation of the child is guilty of a category D felony and shall be punished as provide in
19 NRS 193.130." NRS 200.359(1).
20

21 "Before an arrest warrant may be issued for a violation of this section, the court must find
22 that (a) [t]his is the home state of the child, as defined in NRS 125A.085; and (b) [t]here is cause
23 to believe that the entry of a court order in a civil proceeding brought pursuant to Chapter 125,
24 125A, or 125C of NRS will not be effective to enforce the rights of the parties and would not be
25 in the best interests of the child." NRS 200.359(6).
26

27 ///

28 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
REQUESTED - 9

1 i. **Nevada is the Home State of all Three (3) Minor Children.**

2 This Court must make a finding that the minor children's "Home State" is Nevada
3 pursuant to NRS 125A.085. "Home State" is "[t]he state in which a child lived with a parent or
4 a person acting as a parent for at least 6 consecutive months, including any temporary absence
5 from the state immediately before the commencement of a child custody proceeding." NRS
6 125A.085.
7

8 In this matter both Plaintiff and Defendant contend that Nevada is the Home State for
9 all three (3) minor children. All three (3) minor children to wit; Brayden Bellisario, Blake
10 Bellisario, and Brooklyn Bellisario were born in the State of Nevada and have lived in the State
11 of Nevada Since the time of their birth.
12

13 As such, this Court should enter an Order declaring Nevada the Home State of all three
14 (3) minor children in satisfaction of NRS 200.359(6)(a).
15

16 ii. **An Order in D-20-605263-D Will Not be Effective and is NOT in The Best**
17 **Interests of the Children.**

18 Judge Mary Perry has no control over this matter, at best. At worst, Judge Mary Perry is
19 aiding and abetting the parental alienation and the systematic fraud upon the court committed by
20 Counsel for Plaintiff, Amanda Roberts, Esq. In any event, an Order by Judge Mary Perry in this
21 matter will not be effective to enforce the rights of the parties and provide a means to ensure
22 Defendant is granted his custodial rights.
23

24 "[I]t is in the best interests of a child to have a healthy and close relationship with both
25 parents. *Mansur v. Mansur*, No. 63868, at *2 (Nev. May 14, 2014) (citing *Schwartz v. Schwartz*,
26 107 Nev. 378, 382, 812 P.2d 1268, 1270 (1991)). "Parents have "a fundamental liberty interest
27 in the care, custody, and control of their children". *Id.*

28 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
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1 Orders in this matter by both Judge Sandra Pomrenze (who Judge Perry claims is "such a
2 great judge" despite her reversal rate being over 50%) and her successor Judge Mary Perry have
3 been ineffective in enforcing Defendant's custodial rights. Even further, Judge Mary Perry turns
4 a blind eye to Plaintiff's blatant and intentional violations of court orders and refusal to exercise
5 Defendant's custodial time share. Judge Mary Perry's obvious bias and impartiality toward
6 Plaintiff's Counsel is allowing Plaintiff to perpetuate parental alienation is causing further harm
7 to the three (3) minor children in this matter.
8

9 Temporary Custody Agreement - April 24, 2020.

10 Ever after the time the "J" case in this matter was closed Plaintiff, Emily Bellisario, used
11 child custody as a manipulation tactic in efforts to gain money, gain control, and punish Defendant
12 for deciding to no longer be subjected to Plaintiff's mental and physical abuse any longer.
13

14 After weeks of negotiating, on April 24, 2020 the parties, by and through their respective
15 attorneys at the time, to a temporary custody agreement simply to normalize Defendant's
16 custodial rights until the first hearing in the Divorce matter as Emily constantly changed the minor
17 children's availability on a whim to punish Defendant. On April 24, 2020 the parties
18 memorialized their agreement via letter from Christopher R. Tilman, Esq to Christina Kerrigan,
19 Esq. (See April 24, 2020 Letter, Attached hereto as Exhibit G).
20

21 The agreement stated that Defendant would have Blake and Brooklyn Bellisario from 4:30
22 pm on Fridays until 4:30 pm on Sundays and Defendant would have Brayden Bellisario from
23 10:00 am on Sundays until 4:30 pm on Sundays. The agreement stated that Defendant's visitation
24 would increase prior to the June 2020 hearing date. Notably, the letter also states that, even at
25 that time, Plaintiff was attempting to alienate Defendant's minor son.
26
27

28 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
REQUESTED - 11

1 Defendant attempted to exercise his custodial rights on each and every occasion, however,
2 Plaintiff quickly and often refused visitation completely, and sometimes refused visitation for
3 only Brayden Bellisario, leaving Defendant to wait at North West Area Command to conduct the
4 exchange for hours without any notification or communication.
5

6 Order After Hearing July 30, 2020.

7 On July 30, 2020 Judge Sandra Pomrenze filed an Order in Open Court granting
8 Defendant custodial rights. At that time Defendant had not seen his three (3) minor children in
9 approximately seven (7) weeks as Plaintiff had refused any custodial exchanges prior to the
10 hearing on July 30, 2020. The Order for Supervised Visitation granted Defendant visitation at
11 Donna's House from 2 pm to 4 pm on Sundays effective July 30, 2020. Despite then having a
12 court Order, Plaintiff failed to conduct the Donna's House orientation for two (2) weeks, thereby
13 denying Defendant his visitation rights for two (2) weeks immediately following the hearing.
14 Additionally, Plaintiff routinely withheld the parties' minor son, Brayden Bellisario from
15 visitation. Overall, from July 30, 2020 to October 22, 2020 Plaintiff refused to allow visitation
16 with Brayden Bellisario about three fourths $\frac{3}{4}$ of the time. Thereby Defendant only saw his minor
17 son, Brayden on twenty-five percent (25%) of his court ordered visitation.
18

19 Order After Hearing October 22, 2020.

20 On October 22, 2020 the parties attending a hearing with Judge Sandra Pomrenze. Judge
21 Pomrenze received reports from Donna's House and Nicolas Ponzo). The Pomrenze report
22 concluded that Plaintiff, Emily Bellisario, is either beginning parental alienation or perpetuating
23 parental alienation regarding Brayden Bellisario. Dr. Ponzo also concluded that Emily's alienating
24 behavior would be detrimental to Brayden's mental and emotional development. Judge Pomrenze
25
26
27

28 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
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1 Ordered to move visitation away from Donna's House and to supervised visitation through a third-
2 party. Specifically, the Order After Hearing states that:

3 "THE COURT FURTHER ORDERS that the first Saturday after
4 Defendant has commenced SCRAM, his supervised visitation shall
5 be with the minor child, Brayden, from 11:00 a.m. to 5:00 p.m. Each
6 and every Saturday thereafter, until further Order of the Court, he
7 shall have supervised visitations with all three (3) children, from
8 11:00 a.m. to 5:00 p.m. until further Order of the Court."

9 Defendant went the next day and had SCRAM installed on October 23, 2020. Surprisingly,
10 Plaintiff actually dropped off Brayden Bellisario as Ordered that Saturday for visitation from 11:00
11 a.m. to 5:00 p.m. However, each and every following court ordered visitation Plaintiff either did
12 not bring Brayden for drop-off or caused problems at drop-off with her family friend, Saira
13 McKinley, and eroded time from Defendant's court ordered visitation.

14 Order After Hearing November 23, 2020.

15 On November 23, 2020 the parties attended a return hearing with Judge Sandra
16 Pomrenze. Judge Pomrenze at that hearing removed the restrictions of supervised visitation.
17 Specifically Judge Pomrenze Ordered:

18 "that the Defendant shall have unsupervised visitation with the
19 minor children on Saturdays from noon to 4:00 p.m. The Defendant
20 shall provide all transportation for the visitation. The Defendant
21 shall pull up to the Plaintiff's residence exit the vehicle, but not
22 approach the Plaintiff, solely for the purpose of showing the Plaintiff
23 that the SCRAM ankle monitor remains in place before and after
24 each visitation period. After confirming the SCRAM ankle monitor
25 is in place, the Plaintiff shall send the children to the Defendant to
26 commence visitation."

27 The following Saturday Emily refused visitation in violation of Defendant's court ordered
28 custodial rights. Plaintiff continued to refuse to comply with court orders and grant Defendant
his court ordered visitation rights for several weeks. Finally, the schedule normalized somewhat,

MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
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1 and Plaintiff complied for several weeks until January 23, 2021. On January 23, 2021 Plaintiff
2 and Plaintiff's Counsel had Defendant wrongfully arrested when Defendant was returning
3 Defendant's children from court ordered visitation. Defendant was cuffed in front of the minor
4 children while Plaintiff had them outside watching Defendant getting arrested. The ONLY charge
5 Defendant was booked on was alleged violation of Extended Order for Protection stemming from
6 an email to Plaintiff's father stating that Plaintiff needed to contact Defendant regarding the minor
7 children's health insurance on June 11, 2020. However, Plaintiff and Defendant had already
8 stipulated to dissolve the complained of TPO T-19-200404-T on January 7, 2020. Further,
9 Plaintiff had already requested to have Defendant found in violation of said TPO in March of
10 2020, but the TPO Court Judge found that the parties agreed to dissolve the TPO and Ordered the
11 case closed. The ONLY charge Defendant was arrested for on January 23, 2021 has since been
12 dismissed.

13
14
15 After Plaintiff had Defendant wrongfully arrested on January 23, 2021 Plaintiff refused to
16 conduct any custodial exchanges in violation of the Court Order from November 23, 2020 until
17 April 11, 2021. (See Red Cards attached hereto as Exhibit H).

18
19 Order After Hearing April 6, 2021.

20 On April 6, 2021 the parties were before Judge Mary Perry, Amanda Roberts, Esq.'s close,
21 personal friend, regarding multiple motions. Judge Perry's obvious bias came glaring through
22 during the hearing and concluded with Judge Perry making Orders based upon her friendship and
23 favors owed to Plaintiff's Counsel, Amanda Roberts, rather than based on fact or law.
24 Specifically, Judge Mary Perry stated there would be no finding of facts from the hearing, then
25 proceeded to modify physical and legal custody, A CLEAR ABUSE OF DISCRETION.
26
27

28 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
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1 Specifically, Judge Mary Perry, without a finding of fact to support her Order, reduced
2 Defendant's visitation even though she did declare during the hearing that the children were being
3 withheld by Plaintiff. Judge Mary Perry Ordered supervised visitation for Defendant at Donna's
4 House on Sundays from 9 a.m. to 11 a.m.
5

6 On April 11, 2021 Plaintiff surprisingly brought all three (3) children to supervised
7 visitation at Donna's House. The following weekend, however, Plaintiff refused visitation
8 entirely. The three weekends following that Plaintiff brought the parties' two (2) daughters; Blake
9 Bellisario and Brooklyn Bellisario, however, refused visitation with Brayden Bellisario. From
10 the period of January 23, 2021 through the current date Defendant has had his minor children for
11 approximately 0.01% of the time, despite having court ordered visitation because Plaintiff refuses
12 to follow custodial orders, and further Judge Mary Perry refuses to enforce orders and make
13 further orders to protect the children and do what is in the best interest of the minor children
14 because Judge Mary Perry is corrupt, doing favors for her dear friend, Amanda Roberts, Esq. to
15 the detriment of the minor children.
16
17

18 Each and every time Judge Pomrenze or Judge Perry have entered Orders granting
19 Defendant custodial rights, Plaintiff has refused to allow visitation, Plaintiff has concealed the
20 children, and Plaintiff has continued to alienate the children against Defendant. And each and
21 every time Defendant has requested this Court to act regarding the violation of his custodial rights
22 (a fundamental liberty interest) and Plaintiff's continued quest to deteriorated Defendant's
23 relationship with his children, the Court has refused to act, because the Court is close, personal
24 friends with Amanda Roberts, Esq., Counsel for Plaintiff. The Court is not acting in the best
25 interests of the children by allowing Plaintiff to continuously violate Court orders regarding
26 Defendant's custodial rights. The Court must act to ensure that both parents have a healthy and
27
28 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
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1 close relationship with both parents, not just the parent who hired the Court's close, personal
2 friend, Amanda Roberts, Esq.

3 The Court must grant Defendant's Motion to ensure that children's best interests are met,
4 Plaintiff is held responsible for her violations of custodial orders, and the authorities, acting in the
5 best interests of the children, are able to pursue prosecution of Plaintiff for parental kidnapping
6 pursuant to NRS 200.359. Further, the Court has demonstrated that it has no ability to enforce
7 and uphold any custodial rights awarded to Defendant, as after every Order Plaintiff blatantly and
8 voluntarily violates Defendant's Court Ordered custodial rights.
9

10
11 **III.**
CONCLUSION

12 This is a no-brainer for the Court. The Court is supposed to do what's in the best interests
13 of the children. The Nevada Supreme Court has stated that "it is in the best interests of a child to
14 have a healthy and close relationship with both parents." *Schwartz* at 378. This Court must grant
15 Defendant's Motion simply to allow law enforcement to seek the best interests of the child since
16 the Court is either unwilling to do what's in the best interests of the children or incapable of doing
17 what's in the best interests of the children by upholding the Court's own Orders and having any
18 control over the actions of Plaintiff and/or her Counsel, Amanda Roberts, close, personal friend
19 of Judge Mary Perry.
20
21

22 DATED this 18th day of May 2021.

23 /s/ Bradley Bellisario
24 Bradley Bellisario
25 7100 Grand Montecito Pkwy, #2054
26 Las Vegas, NV 89149
27 T: 702.936.4800
E: bradb@bellisariolaw.com
Defendant Pro Se

28 MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING
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1 **DECLARATION IN SUPPORT MOTION FOR ORDER PURSUANT TO NRS 200.359**
2 **(PARENTAL KIDNAPPING BY PLAINTIFF)**

3 **HEARING REQUESTED**

4
5 I, BRADLEY BELLISARIO, declare under penalty of perjury:

- 6
7 1. I have read the foregoing motion, and the factual averments it contains are true and
8 correct to the best of my knowledge, except as to those matters based on information
9 and belief, and as to those matters, I believe them to be true. Those factual averments
10 contained in the referenced filing are incorporated here as if set forth in full.
11
12 2. This Declaration is made in good faith and not made for the purpose of delay.
13
14 3. Prior to filing the motion, I attempted to resolve the issue through contact with
15 Opposing Counsel, Amanda Roberts, Esq. However, any time I bring up a substantive
16 issue Amanda Roberts, Esq. fails to respond regarding the substantive issue and
17 attempts to direct the conversation in another direction.

18
19 I declare under penalty of perjury under the law of the State of Nevada that the foregoing is
20 true and correct.

21 DATED this 18th day of May 2021.

22
23 /s/ Bradley Bellisario
24 Bradley Bellisario

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Amanda Roberts, Esq.
E: efile@lvfamilylaw.com
Attorney for Plaintiff

MOTION FOR ORDER PURSUANT TO NRS 200.359 (PARENTAL KIDNAPPING BY PLAINTIFF) HEARING REQUESTED - 18

EXHIBIT A

Bethany - CPS (+1 (702) 957-2657)

I just got back to office . I will put the visitation plan together but I was waiting on you to talk to Chris about days for the final . Do you have that ??

8:28:28 AM

Tuesday, December 31, 2019

Bethany - CPS (+1 (702) 957-2657)

Good morning,
I have the visitation plan completed and would like to meet with you to review and sign. Please let me know a good time and day to do so and location .

8:44:54 AM

+1 (309) 397-6734

Hi Bethany - I sent Chris an email last week. I'm waiting to hear back from him

8:45:08 AM

Monday, January 13, 2020

+1 (309) 397-6734

Hi Bethany - Can you send me the name of Brayden's therapist ?

7:41:41 AM

Hi Bethany - Can you send me the name of Brayden's therapist ?

10:28:41 PM

Bethany - CPS (+1 (702) 957-2657)

All about you therapy

7:44:19 PM

+1 (309) 397-6734

Ok thanks . Bethany

7:44:30 PM

Bethany - CPS (+1 (702) 957-2657)

No problem

8:44:40 PM

Tuesday, January 14, 2020

+1 (309) 397-6734

Hi Bethany . Sorry to bother you again. I checked with All About You Counseling and they said they only saw Brayden once for an evaluation. Do you know who Emily took Brayden to after that for therapy ?

8:28:31 PM

Bethany - CPS (+1 (702) 957-2657)

She only reported that one . He was referred to First Med by the Dept but ultimately discharged as he had no needs. Emily independently sought out Counseling for Brayden .

1:04:00 PM

EXHIBIT B

Nicolas Ponzio

Psychotherapy and Consulting

10161 Park Run Drive
Suite 150
Las Vegas, Nevada, 89145
Tel. 702.248.1169
Fax 702.515.7413

October 17, 2020

Honorable Judge S. Pomrenze
Department P
Eighth Judicial District Court
Family Division
Clark County, Nevada

Re: Bellisario vs. Bellisario
Case No.: D-20-605263-D

Reunification Assessment Update/Summary

Process

Parent Interviews
Child Interviews
Parenting Consultation - Mother
Father-Child Reunification Sessions/Observation
Parent Consultation and Updates - Parents
Review of discovery/Documents/Parent Communication

Relevant Background Information

This clinician was contacted by the parents of the minor child Brayden regarding contact and relationship issues between Brayden and his father.

The parents were not clear on the process to be engaged in. The parents stated they believed the process was for supervised visitation. It was clarified by the parents later that the process was to involve reunification assessment and therapy.

The parents reported that the father and child were engaged in supervised visitation at Donna's House. They presented difficulties with facilitation of contact and the supervised visits at Donna's House.

The mother described the child as experiencing a high level of resistance to contact with his father and anxiety at the time of exchanges and transition to his father's care.

Parent Coordination and Cooperation

Parent Perspectives

The mother reported that the parents separated in approximately April or May of 2019. She stated that they experienced several separations prior to their final separation. The mother reported that after the marital separation, the children's father did not maintain consistent contact with the children, did not answer the telephone, and visited rather sporadically. She stated that the father engaged in visitation mostly on weekends, and Saturday and Sunday mornings. The mother stated that the father did engage in visitation on most weekends and sometimes on a weekday. She described the arrangement maintaining consistency until intensification of conflict between the parents.

The mother described violence engaged in and perpetrated by the father, including destruction to her property in August and September of 2019. The mother stated that the CPS were called by the police, and that the CPS suspended the father's visitation.

The mother's presentation and concerns about reunification involved her reports of a history of domestic violence involving the children's father. The mother stated that the CPS recommended no contact between the children's father and Brayden for one month due to Brayden witnessing the destruction of property at her home.

The mother reported that the father resumed visitation with their daughters on Fridays at 4:00 pm to Sunday afternoon at 4:30 PM.

The mother reported that their son began seeing his father on weekends and described the child as becoming resistant and increasingly irritable and angry at the prospect of visiting and spending time with his father. The mother described the child as refusing to let go of her, clinging to her and pleading with her not to release him to his father.

The mother has presented video and audio recordings depicting interactions with the father at exchange and transition times involving their son, and the father's confrontation call to her attorney.

The mother has presented concerns about the father's use of alcohol and issues of anger-control and impulsivity and aggression that create concern and questions of judgment and of safety and risk for their child.

The father corroborated that as a marital couple they have experienced a history of a tumultuous relationship with reports of high conflict and tension between them as well as domestic violence.

The father described the situation of the children at home when he became angry and engaged in destruction of some contents of their house. He presented some differences in the nature of the occurrence but did acknowledge anger and destructiveness in his behavior.

The father reported that after their marital separation, the mother supported joint custody and visitation with the children. The father described concern and suspicion about the mother's current motivations and described a belief that the mother is trying to "punish" him and take control of the children to have primary physical custody and acquire financial support. The father feels that control and finances are a major factor in the mother maintaining a position of controlling access to their minor son.

Child Interviews

Child interviews indicate that the child experiences pressure to resolve conflicts that he observes and experiences between his parents. Child interviews indicate that the child is in a position of exposure to parent tension and conflict over his care. The child did not present or demonstrate issues related to maintaining doubt or reservations about his father due to apparently witnessing the destructive or aggressive events.

The child did mention that he experienced this and acknowledged an impact upon him. He described disappointment in his father's behavior and concern and confusion as to his father's behavior. The child did not describe fear of his father and did not create a correlation between his father's behavior and a perception or anticipation of risk or danger to him.

Child interviews revealed that he does not fear for his safety nor believes his father will harm him. The child described his awareness and understanding that his father is angry with his mother.

He advocated for his mother and recognized that the anger and actions are not appropriate. The child wished for the behavior to cease and expressed a hope that his father does not feel anger or be demeaning to his mother, placing him in an advocacy position for his mother and a role of trying to find solutions and mediate a cessation to anger or hostility.

Regarding his perceptions of his father and the child's view of time with his father and the issue of resistance, the child expressed an open attitude and a desire and hope to have contact with his father.

The child described positive memories with his father and described activities and care from his father.

Reunification Sessions/Father and Child Interaction and Observation

Reunification sessions and observation of the relationship and interaction between the child and his father indicate that the child is comfortable with his father and demonstrated no reservations or resistance or hesitancy in making contact and spending time with his father.

The time and activity observed has been in a controlled setting in the office with this clinician as the facilitator of reunification and contact.

The child expressed eagerness to visit with his father and demonstrated an enthusiastic and positive response to the premise of further contact and in their interaction throughout the meetings.

Observation of interaction indicated comfort, and it was observed that the child maintained proximity and often jumped on his father, sitting with him and on top of him demonstrating affection and a desire for nurturance and attention from his father.

The child and father engaged in playful activity and the child demonstrated comfort in interaction with his father. Upon inquiry, the child expressed feeling safe and cared for by his father.

Reunification sessions and observation indicated that the child and father have a developed bond and an apparent secure attachment of the child with his father. The child demonstrated an ease in his contact and a familiarity with his father with no evidence of inhibitions in their playtime and discussions.

The child responded to questions about past experiences and activity with his father with detailed descriptions of positive memories and father and son time revolving around receiving attention and engaging in mutually pleasurable activities such as fishing.

The child stated that his mother told him that his father broke things recently and hit a car in front of their house.

This seems to raise questions about what the child has been exposed to due to the child stating that his knowledge of destructive acts or hostility towards the mother or property comes from descriptions by the mother. This clinician is not aware of the circumstances and if the child was present but has been told by the mother that the child was in the home when various aggressive or destructive acts took place.

The child expressed a preference to increase contact time with his father. The child continued to demonstrate comfort consistently throughout visits in this office and demonstrated no inhibition or lack of trust in his father's ability for care and attention. The child expressed future oriented ideas and plans for engaging in activity with his father and outlined a desire to play, go on trips, and go fishing with his father.

Further interaction and observation revealed that the child seems to experience the absence of his father and crave attention and reassurance for his father's availability and access to contact and engaging in further activity with his father.

Inquiries were made regarding the child's experience with hurt or harm from his father.

The child denied any history of hurt or experience of harm from his father.

The child expressed awareness that his father has been hurtful to his mother.

The child discussed feeling close and wanting to see his father more.

It is important to note that the child cautioned this clinician to not tell his mother that he feels close and wants to see his father.

The child stated that he does not want his mother to know that he regards his father in a positive way and that he cares for his father and wants to maintain a relationship.

The child repeated that his mother does not want him to see his father. The child stated that his mother is critical of his father and reported that his mother will be angry and upset by his love and care and desire to see and maintain a relationship with his father.

Impressions and Recommendations

There are questions and issues concerning the nature of the father's parenting role in the child's life. One of the questions arises from the understanding that the father maintains contact and visitation with the two other children. The mother has clearly stated that she maintains a protective role and reinforced her concerns by presenting descriptions of a number of incidents that she described and documented as the father's breach of boundaries and aggressive communication and behavior towards her and her property. Based on the mother's presentations and descriptions it is apparent that she maintains a protective role regarding her son although it is not clearly understood what her concern or protective stance is regarding the two other children. Nonetheless, it is important to note that there is consensus by all, including the child, that the fathers' anger and various conflicts enabled difficulty in maintaining boundaries and were experienced as problematic and inappropriate.

It is unclear what the child has directly observed, yet the child is aware of some aspects of the fathers' anger expressions and aggressive and impulsive behavior. It is important to note that regardless of how the child comes to know that there are issues and hostilities as well as unresolved conflict between the parents, the child's exposure to parent conflict and tension is not healthy for his psychological and emotional development.

The child's apparent resiliency and various protective factors have enabled a secure attachment and have not deteriorated the child's comfort and trust and the established bond and desire to spend time with his father. The child clearly expressed and demonstrated a need for his father's involvement and asked for future contact and a relationship with his father.

There is an apparent issue with the child's exposure to conflict and the mother's views and attitudes about his father. The child clearly demonstrated that he has knowledge of the mothers' negative attitudes and perceptions of his father and the mother's protectiveness to the extent of creating and maintaining separation. The child is demonstrating anxiety and preoccupation with maintaining a secret and the effects of triangulation in which he is aware that his mother would be upset with his love and desire for his father to be in his life. This is one of the most important findings in this evaluation of reunification issues. It appears that the child is in a position of triangulation yet has not become resistant nor fully aligned with his mother. He maintains a sense of closeness and trust and desire to spend time and be parented by his father. Unfortunately, the child has developed a loyalty conflict and experiences an inappropriate level of stress and pressure to navigate through the loyalty conflict due to the lack of cohesion between his parents in providing mutual care and mutual support for each other as parents.

The father has acknowledged various issues associated with the use of alcohol, inappropriate comments, and aggressive attitudes and behavior. He stated that he intends to work further on these issues and obviously needs to demonstrate progress and stability in his emotional functioning to prevent impulsive actions that create doubt about aggressive behavior and potential impact on the child. It is recommended that the father engage in personal counseling and demonstrate insight and progress in impulse control and maintaining stability in his mood and in his relationship with the use of alcohol.

This clinician is not making an assessment on the father's alcohol use and is not in a position or role of providing such an assessment but merely reinforcing the need for progress in temperament and mood and impulse control.

The father stated that he has worked on and resolved many issues of reacting and realizes that he needs to maintain effective boundaries and focus on the children rather than resentment or issues with his marital dynamics and adjustment to the separation.

The father has demonstrated frustration with his lack of access and continuity in being able to maintain a relationship with his son which has apparently contributed to his impulsivity and anger reactions.

It is also important to recommend that the parents work on cooperation and cohesion in the care and providing of needs for their child. It is recommended that the mother develop insight into her role in either restricting, or providing access to the father for the needs of their son. It is understandable that the mother has developed a protective role, yet it is not advisable that she solely maintain a prohibitive or restrictive role.

According to content from child interviews and disclosures by the child, the child has developed reservations and been triangulated into parent issues through exposure to the mothers' attitudes about his father.

It is important that the mother recognizes that this is stressful and has a detrimental impact on the child's emotional and psychological development. The child demonstrates trust and comfort with his father yet maintains preoccupation with how to demonstrate love and caring and hope for contact in the context of recognizing that his mother does not support his feelings and would be upset with him.

It is recommended that the mother communicate support and understanding for her sons' feelings and desire to have contact with his father. In the absence of clarification from the mother, the child will feel strain of not finding support from his mother and risks the suppression of his attachment with his father. This can lead to deterioration of the relationship and onset or perpetuation of alienation dynamics that have a detrimental impact on the child's emotional development.

Based on findings from child interviews and reunification sessions, it is recommended that the father and child immediately restore contact and increase their visitation to a point of consistency and structure in order to benefit the child by having access to his father's care and support. Structured visitation can be developed on a graduated basis beginning with enabling the father to have consistent contact with an appropriate supervisor, then progress towards unsupervised visitation and a regular schedule of visitation and parenting involvement.

The conditions that should be placed on graduating to a higher level of visitation and parental involvement are progress in the fathers' demonstration of stable temperament and in the absence of incidents that the child could be exposed to.
Further conditions are progress in positive interaction through supervised visits or reunification sessions where monitoring can take place to provide information on stability and security in the father and child relationship.

Respectfully submitted,

Nicolas Ponzo

Nicolas Ponzo, BA, (Phil.), BA, (Psych.),
M.ED. (Psych.), MSW, (Clin.), LCSW, DCSW
Diplomate, NASW

(electronic signature on 10/17/2020)

EXHIBIT C

Message: 225 of 731**Date:** 04/25/2020 7:06 AM**From:** Bradley Bellisario**To:** Emily Bellisario (First View: 04/25/2020 11:36 AM)**Subject:** Re: Brayden therapy

I will not accept either. We should both research a therapist then email only communication to them with both attached when we've agreed on one. Both of us need to be included with every communication. And that needs to be spelled out with the therapist. I will not have a repeat of Donna. You have been shopping Brayden around trying to get the result you want. We need someone that has not had an ex parte communication with either of us.

Message: 226 of 731**Date:** 04/24/2020 10:14 PM**From:** Emily Bellisario**To:** Bradley Bellisario (First View: 04/25/2020 7:03 AM)**Subject:** Brayden therapy

These are the two therapist that have gotten back to me, Cindy Osborn & Anna Trujillo they have availability as early as this Monday the 26th. Please let me know which of these you agree to let Brayden be seen by. I'd like to have him start going asap.

Message: 227 of 731**Date:** 04/24/2020 8:38 PM**From:** Bradley Bellisario**To:** Emily Bellisario (First View: 04/25/2020 11:36 AM)**Subject:** Re: Re: Re: Re: Re: Re: Re: Re: Re: Re: Re: Kids

Can't wait to get in front of the judge.

Message: 228 of 731**Date:** 04/24/2020 8:36 PM**From:** Bradley Bellisario**To:** Emily Bellisario (First View: 04/25/2020 11:36 AM)**Subject:** Re: Re: Re: Re: Re: Re: Re: Re: Re: Re: Re: Kids

Wow. Project much? We'll do the exchanges at Donna's House of Sunday doesn't go well. I have no desire to interact with you at all. You can't even just get the girls out and send them over. And working on Bae to get her not to go and playing it up for the camera.

EXHIBIT D

Brayden can go to the therapist the judge appoints :)

Message: 212 of 731

Date: 04/26/2020 11:49 AM

From: Bradley Bellisario

To: Emily Bellisario (First View: 04/26/2020 11:50 AM)

Subject: Re: Re: Re: Re: Re: Brayden

Your attorney can't even get factual statements from court orders and dockets correct because he's knowingly lying to look good. Plus you guys have done nothing procedurally correct in order to try and gain advantages. I'm comfortable with anything your attorney tries to present. I have facts as well.

Have a blessed day

Message: 213 of 731

Date: 04/26/2020 11:46 AM

From: Bradley Bellisario

To: Emily Bellisario (First View: 04/26/2020 11:49 AM)

Subject: Re: Therapy

Your message you sent me said here's two names of people that have gotten back to me. I'm not sending Brayden to anyone you've had prior contact with. Next.

Message: 214 of 731

Date: 04/26/2020 11:42 AM

From: Emily Bellisario

To: Bradley Bellisario (First View: 04/26/2020 11:46 AM)

Subject: Therapy

I have never spoken to Anna Trujillo can you give me a reason why you are opposed to her?

EXHIBIT E

Message: 180 of 731**Date:** 05/22/2020 11:28 AM**From:** Bradley Bellisario**To:** Emily Bellisario (First View: 05/22/2020 11:34 AM)**Subject:** RE: Brayden

You're withholding Brayden once again unless I do something you want. Brayden asks to spend the night. He tells me he wants to come over every day but mommy won't let him. He has no issues being with me, he enjoys himself a lot over here. What therapist is that who you had a discussion about having overnights?

As per our agreement through my attorney and your prior lawyers, I agreed to having Brayden go to a therapist, but NOT Donna Wilburn. To my knowledge Brayden went to her three (3) times, unless she saw and treated Brayden specifically after acknowledging my withdraw of consent. As far as the other therapists you sent over, I'm sure they were names given to you by Donna since Donna is friends with Anna Trujillo. So Trujillo is a hard no, I can't find anything on Cindy Osborn, but I'd assume she's a referral from Donna as well. Much like Donna is friends with Jason Stoffel who coincidentally is the husband of your new attorney and partner in their law firm. If you would let me know the health insurance company you have I'll be glad to look over providers included in network and give a few suggestions after researching a few.

Message: 181 of 731**Date:** 05/22/2020 10:54 AM**From:** Emily Bellisario**To:** Bradley Bellisario (First View: 05/22/2020 11:08 AM)**Subject:** Brayden

I would love for you to have an overnight with Brayden once you agree to a therapist. Brayden has been seen by the therapist, and we have had a discussion with the therapist regarding you having overnights. Let's agree to one today so he can be seen hopefully next week. Since Donna has already built the trust with him I think she would be great for Brayden to go to. If not I sent you over a few others to review please consider them. And If you would like more time with Brayden how about we move this Sunday's pick up to 6:30 instead of 4:30 so you get a few extra hours with him this weekend?

Message: 182 of 731**Date:** 05/21/2020 12:11 PM**From:** Bradley Bellisario**To:** Emily Bellisario (First View: 05/22/2020 10:54 AM)**Subject:** Brayden this weekend.

Pursuant to our agreement we're supposed to increase my time with Brayden. Brayden has expressed he wants to come over more but you don't let him. This weekend can I get him on Saturday and bring him back on Sunday with the girls?

EXHIBIT F

Steven D. Grierson

1 **SAO**

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.

) **STIPULATION AND ORDER**

16 BRADLEY BELLISARIO,

17 Defendant.

18 COMES NOW, the Plaintiffs, Emily Bellisario, by and through her attorney
19 of record, Amanda M. Roberts, Esq., of Roberts Stoffel Family Law Group, and the
20 Defendant, Bradley Bellisario, by and through his attorney of record, Christopher
21 R. Tilman, Esq., and hereby agree to the following terms and conditions:

22 THE PARTIES HEREBY STIPULATE AND AGREE that the Parties have
23 three (3) minor children, to wit: Brayden Bellisario ("Brayden"), born on January
24
25
26
27
28

1 15, 2015; Blake Bellisario ("Blake"), born on November 20, 2016; and Brooklyn
2 Bellisario ("Brooklyn"), born on February 1, 2018.

3 THE PARTIES HEREBY STIPULATE AND AGREE that Brayden shall be
4 enrolled in therapy with a neutral therapist, and it must be someone other than
5 Donna Wilburn.
6

7 THE PARTIES HEREBY STIPULATE AND AGREE this is a highly
8 contested custody action and it would be beneficial for the Court to receive a full
9 custody evaluation, including psychological assessments of the Parties. Thus, the
10 Parties have selected Dr. Stephanie Holland, and the custody evaluation process
11 shall commence forthwith. Dr. Holland shall be permitted to make interim
12 recommendations to the Court for consideration pending the final outcome of the
13 custody evaluation. The Defendant shall front the cost for the custody evaluation
14 subject to reallocation by the Court based upon the outcome of the custody
15 evaluation.
16
17
18

19 THE PARTIES HEREBY STIPULATE AND AGREE that Plaintiff's
20 Counsel shall immediately submit a Subpoena to Donna Wilburn for a complete
21 copy of her file related to the treatment for Brayden and those records, upon receipt,
22 shall be provided to Dr. Holland for review and consideration.
23

24 THE PARTIES HEREBY STIPULATE AND AGREE that Defendant and
25 Brayden shall engage in reunification. The Parties have agreed to use Nicholas
26

1 Ponzo for reunification. The Defendant shall front the cost for reunification subject
2 to reallocation by the Court.

3 THE PARTIES HEREBY STIPULATE AND AGREE that the hearing
4 scheduled June 16, 2020, shall be continued for two (2) weeks to allow Counsel to
5 attempt resolve the outstanding issues in the matter which include the following:
6 (1.) temporary custodial Orders; (2.) proof of health insurance coverage for the
7 entire family; (3.) temporary support for the Plaintiff; and (4.) Plaintiff's request for
8 attorney fees.
9

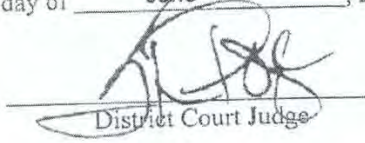
10
11 NOW THEREFORE,

12 IT IS HEREBY ORDERED that the Parties agreements as set forth herein
13 are adopted without restatement herein.
14

15 \\\\
16 \\\\
17 \\\\
18 \\\\
19 \\\\
20 \\\\
21 \\\\
22 \\\\
23 \\\\
24 \\\\
25 \\\\
26 \\\\
27
28

1 IT IS FURTHER ORDERED that the hearing scheduled on June 16, 2020, at
2 10:00 a.m., shall be continued to July 30, 2020, at
3 10:00 a.m.
4

5 IT IS SO ORDERED this 10th day of June, 2020.
6


7 
8 District Court Judge

9 Submitted this 10th day of June, 2020.
10

Approved as to content and form this
day of _____, 2020.

11 **ROBERTS STOFFEL FAMILY**
12 **LAW GROUP**

CHRISTOPHER R. TILMAN, CHTD.

13 By: 
14 Amanda M. Roberts, Esq.
15 State of Nevada Bar No. 9294
16 4411 South Pecos Road
17 Las Vegas, Nevada 89121
18 PH: (702) 474-7007
19 FAX: (702) 474-7477
20 EMAIL: efile@lvfamilylaw.com
21 Attorney for Plaintiff


By: 
Christopher R. Tilman, Esq.
State Bar of Nevada No. 05150
1211 South Maryland Parkway
Las Vegas, Nevada 89104
PH: (702) 214-4214
FAX: (702) 214-4208
EMAIL: crt@christophertilman.com
Attorney for Defendant

EXHIBIT G

Christopher R. Tilman, Chtd.

A Professional Law Corporation
1211 SOUTH MARYLAND PARKWAY
LAS VEGAS, NEVADA 89104
PHONE: (702) 214-4214 FAX: (702) 214-4208
WWW.CHRISTOPHERTILMAN.COM

CHRISTOPHER TILMAN, ESQ.,

Kathy Gentry, Firm Administrator/Paralegal
Christie Fivella, Legal Assistant

E-MAILS :CRT@ChristopherTilman.com; Kathy@ChristopherTilman.com; Christie@ChristopherTilman.com;

April 24, 2020

**VIA FAX TO: 702-685-3625
AND U.S. MAIL**

Christina Kerrigan, Esq.
Joe W. Riccio, Esq.
719 So. Sixth Street
Las Vegas, NV 89101

Re: Bellasario v. Bellasario

Dear Christina and/or Joe:

This shall confirm our telephone conversation today wherein we agreed for my client to pick up the girls today at 4:30 p.m. and keeping them until Sunday at 4:30 p.m. The parties' son will have visitation from 10:00 a.m. Sunday to 4:30 p.m., with expanded visitation for him to occur prior to the June hearing date. It remains our contention that your client is attempting to alienate the son and this must stop. This schedule shall continue every week. The exchanges shall take place at the Las Vegas Metropolitan Police Department, NW Area Command Center, 9850 West Cheyenne. NO third parties will speak or get out of their vehicles, the parties will park 10 feet apart and conduct the exchange in a civil manner.

This schedule shall be temporary ONLY until the June hearing and will NOT prejudice our claim for joint physical or your claim for primary. This temporary schedule is just to ensure ongoing, regular contact during the quarantine and until the next hearing and shall NOT be used against either party and their respective claims for custody.

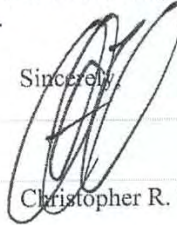
Additionally, we agree to the son having a new therapist, however, it shall NOT be Donna Wilburn and the parties shall work together to obtain a therapist for the child which is covered under insurance. The new therapist MUST speak with both parents and remain impartial. However, this shall NOT be a basis to continue to deny contact with the son and your client should encourage the child to attend all weekend with his siblings.

AA3110

Christina Kerrigan, Esq.
April 24, 2020
Page Two

Should this be an issue, or not be your understanding from our conversation, please contact me. Thank you for your time and attention.

Sincerely,

A handwritten signature in black ink, appearing to be "Chris Tilman", written over a horizontal line.

Christopher R. Tilman, Esq.

CRT/kg

cc: Bradley Bellasario, Esq.

AA3111

EXHIBIT H

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by
- ☒ Child Ex-Change



Address

9850 W. CHEYENNE AVE

Event #

LLV-00000149758

Apt. Name

Message

READY TO GO TO

STATION TO DO CHILD EX-CHANGE TODAY WAS
NOT AT THE STATION PER COURT ORDER
TO DO EX-CHANGE FOR BRADON

Date

5/31/00

Time

11:00

Officer Name

S. TETON

P#

16055

LVMPD 275 (REV. 10-14)

DISTRIBUTION: WHITE • SUBSTATION CARDSTOCK • CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by
- ☒ Child Ex-Change



Address

1913 SONDRIO LN. 89134

Event #

LLV-10300175510

Apt. Name

Message

BRAD IS SAVING

W/STUDY AGREEMENT ISSUES WITH HIS WIFE,
EMILY B. CHASE

Date

3/27/01

Time

11:25

Officer Name

S. TETON

P#

16055

LVMPD 275 (REV. 10-14)

DISTRIBUTION: WHITE • SUBSTATION CARDSTOCK • CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by
- ☒ Child Ex-Change



Address

1913 SONDRIO LN.

Event #

LLV-10300175510

Apt. Name

Message

PR REQUESTED POLICE

FOR CHILD CUSTODY EXCHANGE. PER CUSTODY AGREEMENT
PR IS ALLOWED TO SEE CHILDREN. FEMALE HALL DID NOT
WANT ANSWER TO QUESTION.

Date

J-13-21

Time

11:56

Officer Name

A. MARSHALL

P#

16415

LVMPD 275 (REV. 10-14)

DISTRIBUTION: WHITE • SUBSTATION CARDSTOCK • CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by

Address: 1913 SONDRIO LN, 89134 Event #: LLV210300092652

Apt. Name: Message: BRAD IS HAVING IS

ISSUES GETTING CUSTODY OF HIS CHILDREN PER
THEIR CUSTODY AGREEMENT.

Date: 03/20/21 Time: 1133 Officer Name: J. DEJAENITIS P#: 18219

LVMPD 275 (REV. 10-14)

DISTRIBUTION: WHITE • SUBSTATION CARDSTOCK • CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by

Address: 1900 VILLAGE CENTER CIR 210200123044 Event #: LLV2103000123044

Apt. Name: BELLISARIO, BRADLEY Message: HAS A COURT ORDER

SIGNED BY A JUDGE FOR VISITATION FOR HIS THREE
CHILDREN BRADEN, BRACE AND BROOKLYN ON SAT FROM
12PM-4PM. MOTHER BELLISARIO FAMILY REFUSED TO GIVE

Date: 03-27-21 Time: 12:24 Officer Name: N. HELESTIS P#: 15671

LVMPD 275 (REV. 10-14)

DISTRIBUTION: WHITE • SUBSTATION CARDSTOCK • CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT



- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by

Address: 1913 SONDRIO DR Event #: LLV210300026394

Apt. Name: Message: FATHER ATTEMPTED

TO PICK UP SUZE'S PER COURT ORDER.
MOTHER OF SUZE'S REFUSED
ANSWER DOOR.

Date: 3/6/21 Time: 1215 Officer Name: MURPHY P#: 15341

LVMPD 275 (REV. 10-14)

DISTRIBUTION: WHITE • SUBSTATION CARDSTOCK • CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by



Address

1913 SONDRIO DR

Event #

LLV210200056086

Apt. Name

Message

EMILY REFUSES TO TURN

OVER CHILD REGARDLESS OF COURT ORDER

720-2066397

Date

021321

Time

1220

Officer Name

B. FARRINGTON

P#

14808

LVMPD 275 (REV. 10-14)

DISTRIBUTION: WHITE - SUBSTATION CARDSTOCK - CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by



Address

1913 SONDRIO DR

Event #

210200087694

Apt. Name

Message

WIFE, EMILY REYESARZO,

IS TO GIVE FATHER VISITATION ON

SATURDAYS FROM 12pm-4pm EMILY P20

NOT GIVE CHILDREN TO FATHER TODAY

Date

2/20/21

Time

1320

Officer Name

MURPHY

P#

15341

LVMPD 275 (REV. 10-14)

DISTRIBUTION: WHITE - SUBSTATION CARDSTOCK - CITIZEN

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

- ☐ Apt. Notification
- ☐ Garage Door
- ☐ Curfew Notification
- ☐ Other

- ☐ Disturbance
- ☐ Drug Activity
- ☐ Theft
- ☐ Vandalism

- ☐ Trespassing
- ☐ Domestic Violence
- ☐ Civil Stand-by



Address

1913 SONDRIO DR

Event #

LLV2102001201144

Apt. Name

Message

IS GIVING CHILDREN TO

CHILD EXCHANGE AND EVENT 117754 RE: WIFE SARAH EXT. TO

NOT ALLOWED FOR EXCHANGE AND SHE REFUSED HALF N

WIFE WANTED TO CONDUCT EXCHANGE

Date

11-26-20

Time

1425

Officer Name

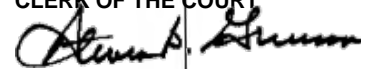
A. J. J. J.

P#

16415

LVMPD 275 (REV. 10-14)

DISTRIBUTION: WHITE - SUBSTATION CARDSTOCK - CITIZEN



1 **MISC**
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 *Plaintiff Pro Se*

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

9 EMILY BELLISARIO,
10 Plaintiff,

11 vs.

12 BRADLEY BELLISARIO,
13 Defendant

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

**INFORMATION REGARDING
THERAPY PROVIDED BY ANNA
TRUJILLO AS REQUESTED BY JUDGE
MARY PERRY AT HEARING ON MAY
18, 2021**

14 Defendant, Bradley Bellisario, in proper person, hereby submits the following
15 information regarding therapy provided by Anna Trujillo as requested by Judge Mary Perry at
16 Hearing on May 18, 2021.

17 **I.**
18 **INTRODUCTION**

19 On May 18th, 2021 the parties attending a hearing before Judge Mary Perry regarding
20 multiple motions. During the hearing, Defendant argued that Defendant objected to the use of
21 Dr. Stephanie Holland as the Stipulation and Order regarding Dr. Holland's appointment was
22 obtained by fraud by omission of Plaintiff and Plaintiff's Counsel, Amanda Roberts, Esq.
23 Additionally, Defendant argued that Plaintiff enrolled the parties' minor child, Brayden Bellisario,

24 INFORMATION REGARDING THERAPY PROVIDED BY ANNA TRUJILLO AS REQUESTED BY JUDGE
25 MARY PERRY AT HEARING ON MAY 18, 2021 - 1

1 in mental health services with Anna Trujillo after Defendant specifically objected to Plaintiff's
2 choice of her services. Defendant also alleged that Plaintiff fraudulently claimed that Defendant,
3 Bradley Bellisario, agreed to the use of Anna Trujillo's services as Plaintiff alleged that both
4 parents consented to Anna Trujillo's services on Ms. Trujillo's informed consent and intake form.
5

6 Judge Perry requested that Defendant provide that information to the Court. Defendant
7 hereby produces said evidence regarding the fraudulent intake and consent form filled out by
8 Plaintiff and Defendant's rejection of Anna Trujillo in writing, prior to Plaintiff taking Brayden
9 to treatment with Anna Trujillo and prior to Plaintiff filling out Ms. Trujillo's informed consent
10 and intake form.
11

12 **II.** 13 **STATEMENT OF FACTS**

14 On April 24, 2020 Plaintiff contacted Defendant regarding a new therapist for the parties'
15 minor son. Plaintiff stated;
16

17 "[t]hese are the two therapist that have gotten back to me, Cindy
18 Osborn & Anna Trujillo they have availability as early as this
19 Monday the 26th. Please let me know which of these you agree to
20 let Brayden to be seen by. I'd like to have him start going asap."
(See Our Family Wizard messages, attached hereto as Exhibit A)

21 Defendant replied;

22 "I will not accept either. We should both research a therapist then
23 email only communication to them with both attached when we've
24 agreed on one. Both of us need to be included with every
25 communication. And that needs to be spelled out with the therapist.
26 I will not have a repeat of Donna. You have been shopping Brayden
27 around trying to get the result you want. We need someone that has
28 not had an ex-parte communication with either of us." (See Our
Family Wizard messages, attached hereto as Exhibit A)

INFORMATION REGARDING THERAPY PROVIDED BY ANNA TRUJILLO AS REQUESTED BY JUDGE
MARY PERRY AT HEARING ON MAY 18, 2021 - 2

1 Plaintiff continued to talk about a therapist for the parties' minor son and specifically
2 stated that she would simply ask the Judge to appoint a therapist. On April 26, 2020 Plaintiff sent
3 Defendant a message on Our Family Wizard stating, "I have never spoken to Anna Trujillo can
4 you give me a reason why you are opposed to her?" (See Our Family Wizard messages, attached
5 hereto as Exhibit B). Defendant replied "[y]our message you sent me said here's two names of
6 people that have gotten back to me. I'm not sending Brayden to anyone you've had prior contact
7 with. Next." (See Our Family Wizard messages, attached hereto as Exhibit B). Upon information
8 and belief, Plaintiff already had an appointment scheduled with Anna Trujillo as Plaintiff took
9 Brayden for "treatment" with Anna Trujillo on April 27, 2020 with knowledge that Defendant
10 objected to the choice of therapist. (See Billing Records, Attached hereto as Exhibit C).
11 Additionally, on April 27, 2020 at approximately 12:46 p.m. Plaintiff, Emily Bellisario
12 electronically signed a New Patient Intake Packet (Minors) informed consent that asks:

13 **Q: "Do both parents provide consent for treatment?"**

14 **A: "Yes" (provided by Emily Bellisario)**

15 (See Intake Packet attached hereto as Exhibit D, Page 3 of 4, near top of page)

16 Emily Bellisario fraudulently claimed that both parents consented for treatment on April
17 27, 2020 after Defendant specifically denied Anna Trujillo's services on both April 24, 2020 and
18 April 26, 2020, and Defendant was attempting to work with Plaintiff to find a neutral third-party
19 therapist which took Brayden's insurance.

20 On May 22, 2020 without prior notice to Defendant, Plaintiff states that "Brayden has
21 been seen by the therapist, and we have had a discussion with the therapist regarding you having
22 overnights." (See Our Family Wizard Messages, attached hereto as Exhibit E).

23
24
25
26
27
28 INFORMATION REGARDING THERAPY PROVIDED BY ANNA TRUJILLO AS REQUESTED BY JUDGE
MARY PERRY AT HEARING ON MAY 18, 2021 - 3

1 On June 10, 2020 Plaintiff and Plaintiff's Counsel finalized negotiations with Defendant
2 and Defendant's Counsel regarding a stipulation and order addressing various issues. Among
3 those issues was the hot topic of a child therapist. The Stipulation and Order specifically states
4 that "THE PARTIES STIPULATE AND AGREE that Brayden **SHALL BE** enrolled in therapy
5 with a neutral therapist, and it must be someone other than Donna Wilburn." [Emphasis Added].
6

7 After June 10, 2020 Defendant did not hear another peep from Plaintiff regarding a child
8 therapist other than Nicolas Ponzo, who the parties agreed to for reunification therapy. It wasn't
9 until October 22, 2020 at the parties' return hearing that Defendant was informed of the non-
10 neutral therapist treatment when Ms. Roberts stated the therapist, Anna Trujillo, who was secretly
11 "treating" Brayden, attempted to contact Dr. Ponzo in an attempt to influence his report to this
12 Court.
13

14 Defendant then contacted Anna Trujillo regarding a copy of records. Ms. Trujillo
15 attempted to dodge the request, but ultimately gave Defendant medical records, partial billing,
16 and partial intake records. To Defendant's surprise, Plaintiff had the parties' minor son "treating"
17 with Anna Trujillo since April 27, 2020 despite Defendant's adamant rejection of Ms. Trujillo as
18 a treating therapist. Ms. Trujillo's employment was especially surprising to Defendant as Plaintiff
19 and Plaintiff's Counsel had represented from April 27, 2020, through the negotiations regarding
20 the June 10, 2020 stipulation and order, that Brayden was not treating with a therapist. Not only
21 did Plaintiff take Brayden to Anna Trujillo for initial assessment the day after Defendant
22 specifically rejected Ms. Trujillo as a therapist, Plaintiff lied on the informed consent form
23 Plaintiff filled out for Ms. Trujillo's services. On the informed consent form Plaintiff replied
24 "Yes" to the question "Do both parents provide consent for treatment?" Clearly Plaintiff knew
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28 INFORMATION REGARDING THERAPY PROVIDED BY ANNA TRUJILLO AS REQUESTED BY JUDGE
MARY PERRY AT HEARING ON MAY 18, 2021 - 4

1 Defendant did not consent to "treatment" as Defendant had vehemently denied Ms. Trujillo as a
2 service provider less than 24 hours prior.

3
4 **III.**
CONCLUSION

5 From even before the onset of litigation, Plaintiff, Emily Bellisario has embarked on a
6 course of conduct to alienate and mentally manipulate (abuse) the parties minor son, Brayden
7 Bellisario, and to use him as a pawn in the divorce action by seeking beneficial therapist reports
8 at the expense of the parties' minor son. The proceeding was not intended to be a motion by any
9 means, Defendant was simply providing the information requested by Judge Perry at hearing, and
10 is not filed to harass, delay, or for any reason other than good faith.
11

12
13 DATED this 19th day of May 2021.

14 /s/ Bradley Bellisario
15 Bradley Bellisario
16 7100 Grand Montecito Pkwy, #2054
17 Las Vegas, NV 89149
18 T: 702.936.4800
19 F: 702.936.4801
20 E: bradb@bellisariolaw.com
21 *Defendant Pro Se*
22
23
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28 INFORMATION REGARDING THERAPY PROVIDED BY ANNA TRUJILLO AS REQUESTED BY JUDGE
MARY PERRY AT HEARING ON MAY 18, 2021 - 5

1
2 **DECLARATION OF BRADLEY J. BELLISARIO**

3 STATE OF NEVADA)
4) ss.
5 COUNTY OF CLARK)

- 6 1. I am the Defendant in the above entitled matter;
- 7 2. That I read the foregoing **Information Regarding Therapy Provided by Anna Trujillo**
8 **as Requested by Judge Mary Perry at Hearing on May 18, 2021**, including the points
9 and authorities and any exhibits attached hereto and the same are true and correct to the
10 best of my knowledge and belief.

11
12 I declare under penalty of perjury that the foregoing is true and correct.
13

14 DATED this 19th day of May 2021.
15

16
17 /s/ Bradley Bellisario
18 Bradley J. Bellisario *Defendant Pro Se*
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28 INFORMATION REGARDING THERAPY PROVIDED BY ANNA TRUJILLO AS REQUESTED BY JUDGE
MARY PERRY AT HEARING ON MAY 18, 2021 - 6

1
2 **CERTIFICATE OF SERVICE**

3 I hereby certify that I am Defendant in the above-entitled matter, and on the 10th day of
4 December 2020, I served by and through Wiz-Net electronic service, pursuant to Clark County
5 District Court Administrative Order 14-2 for service of documents identified in Rule 9 of the
6 N.E.F.C.R., the foregoing **Information Regarding Therapy Provided by Anna Trujillo as**
7 **Requested by Judge Mary Perry at Hearing on May 18, 2021** to:
8

9
10 Amanda Roberts, Esq.
11 E: efile@lvfamilylaw.com
12 *Attorney for Plaintiff*

13 By: /s/ Bradley Bellisario
14 Bradley Bellisario, *Defendant*
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28 INFORMATION REGARDING THERAPY PROVIDED BY ANNA TRUJILLO AS REQUESTED BY JUDGE
MARY PERRY AT HEARING ON MAY 18, 2021 - 7

EXHIBIT A

Message: 225 of 731**Date:** 04/25/2020 7:06 AM**From:** Bradley Bellisario**To:** Emily Bellisario (First View: 04/25/2020 11:36 AM)**Subject:** Re: Brayden therapy

I will not accept either. We should both research a therapist then email only communication to them with both attached when we've agreed on one. Both of us need to be included with every communication. And that needs to be spelled out with the therapist. I will not have a repeat of Donna. You have been shopping Brayden around trying to get the result you want. We need someone that has not had an ex parte communication with either of us.

Message: 226 of 731**Date:** 04/24/2020 10:14 PM**From:** Emily Bellisario**To:** Bradley Bellisario (First View: 04/25/2020 7:03 AM)**Subject:** Brayden therapy

These are the two therapist that have gotten back to me, Cindy Osborn & Anna Trujillo they have availability as early as this Monday the 26th. Please let me know which of these you agree to let Brayden be seen by. I'd like to have him start going asap.

Message: 227 of 731**Date:** 04/24/2020 8:38 PM**From:** Bradley Bellisario**To:** Emily Bellisario (First View: 04/25/2020 11:36 AM)**Subject:** Re: Re: Re: Re: Re: Re: Re: Re: Re: Re: Re: Kids

Can't wait to get in front of the judge.

Message: 228 of 731**Date:** 04/24/2020 8:36 PM**From:** Bradley Bellisario**To:** Emily Bellisario (First View: 04/25/2020 11:35 AM)**Subject:** Re: Re: Re: Re: Re: Re: Re: Re: Re: Re: Re: Kids

Wow. Project much? We'll do the exchanges at Donna's House of Sunday doesn't go well. I have no desire to interact with you at all. You can't even just get the girls out and send them over. And working on Bao to get her not to go and playing it up for the camera.

EXHIBIT B

Brayden can go to the therapist the judge appoints :)

Message: 212 of 731

Date: 04/26/2020 11:49 AM

From: Bradley Bellisario

To: Emily Bellisario (First View: 04/26/2020 11:50 AM)

Subject: Re: Re: Re: Re: Re: Brayden

Your attorney can't even get factual statements from court orders and dockets correct because he's knowingly lying to look good. Plus you guys have done nothing procedurally correct in order to try and gain advantages. I'm comfortable with anything your attorney tries to present. I have facts as well.

Have a blessed day

Message: 213 of 731

Date: 04/26/2020 11:46 AM

From: Bradley Bellisario

To: Emily Bellisario (First View: 04/26/2020 11:49 AM)

Subject: Re: Therapy

Your message you sent me said here's two names of people that have gotten back to me. I'm not sending Brayden to anyone you've had prior contact with. Next.

Message: 214 of 731

Date: 04/26/2020 11:42 AM

From: Emily Bellisario

To: Bradley Bellisario (First View: 04/26/2020 11:46 AM)

Subject: Therapy

I have never spoken to Anna Trujillo can you give me a reason why you are opposed to her?

EXHIBIT C

Date of Service	Clinician	Billing Code	Rate per Unit	Units	Total Fee	Client Payment Status	Charge	Uninvoiced	Paid	Write Off	Unpaid
04/27/2020 16:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
05/08/2020 13:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
05/14/2020 16:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
05/21/2020 16:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
05/28/2020 16:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
06/04/2020 16:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
06/11/2020 15:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
06/24/2020 13:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
07/02/2020 15:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
07/09/2020 15:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
07/23/2020 15:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
08/13/2020 15:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
08/27/2020 15:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
09/10/2020 15:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0
09/24/2020 15:00	Anna Trujillo	90834	100.0	1	100.0	PAID	100.0	0.0	100.0	0.0	0.0

EXHIBIT D

Client: Brayden Bellisario

DOB: 01/15/2015

New Patient Intake Packet (Minors)

New Patient Intake Packet (Minors) completed by Emily Bellisario

PART I: YOUR RIGHTS AS CLIENT(S)

1. You have the right to ask questions about any procedures used during therapy; if you wish, I will explain my approach and methods to you. If I see a child under the age of consent (which varies for different states/jurisdictions), all custodial parents have a right to information shared in the session. Custodial parents should be aware that exercising this right may be detrimental to the therapeutic process, and so may wish to allow confidentiality between the child and therapist.

2. You have the right to decide not to receive therapeutic assistance from me; if you wish, I will provide you with the names of other qualified professionals whose services you might prefer.

3. You have the right to end therapy at any time without any moral, legal, or financial obligations other than those already accrued. I ask that you contact me by phone or email if you make such a decision without consulting with me.

4. You have a right to review your records in the files at any time. I do not keep any "secret notes," so please do not ask me to do so.

5. One of the most important rights involves confidentiality: Within the limits of the law, information revealed by you during therapy will be kept strictly confidential and will not be revealed to any other person or agency without your written permission. Additionally, when more than one family member is being seen in therapy, the therapist views the family as a whole as the client. Therefore, releases of information for family sessions require the written approval of every consenting member of the family who was present at any time during the treatment.

6. If you request it, any part of your record in the files can be released to any person or agency you designate. I will tell you at the time whether or not I think releasing the information in question to that person or agency might be harmful in any way to you.

7. You should also know that there are certain situations in which I am required by law to reveal information obtained during therapy to other persons or agencies without your permission. Also, I am not required to inform you of my actions in this regard. These situations are as follows: (a) if you threaten grave or bodily harm or death to another person, I am required by law to the state of Nevada (b) If a court of law issues a legitimate court order (signed by a judge), I am required by law to provide the information specifically described in that order; (c) If you reveal information relative to child abuse, child neglect, or elder abuse, I am required by law to report this to the appropriate authority; (d) If you are in therapy by order of a court of law, the results of the treatment ordered must be revealed to the court.

8. COURT CASE OR LEGAL PROCEEDINGS

If you require information regarding your therapy be provided authorization must given with a signed Authorization to Release Information form indicating specifics about what and to whom your therapist will release.

9. TELEPHONE ACCESSIBILITY

If you need to contact me between sessions, please leave a message on my voicemail. I am often not immediately available; however, I will attempt to return your call within 24 hours. Please note that Face- to-face sessions are highly preferable to phone sessions. However, in the event that you are out of town, sick or need additional support, phone sessions are available. If a true emergency situation arises, please call 911 or any local emergency room.

10. SOCIAL MEDIA AND TELECOMMUNICATION

Due to the importance of your confidentiality and the importance of minimizing dual relationships, I do not accept friend or contact requests from current or former clients on any social networking site (Facebook, LinkedIn, etc). I believe that adding clients as friends or contacts on these sites can compromise your confidentiality and our respective privacy. It may also blur the boundaries of our therapeutic relationship. If you have questions about this, please bring them up when we meet and we can talk more about it.

11. ELECTRONIC COMMUNICATION

I cannot ensure the confidentiality of any form of communication through electronic media, including text messages. If you prefer to communicate via email or text messaging for issues regarding scheduling or cancellations, I will do so. While I may try to return messages in a timely manner, I cannot guarantee immediate response and request that you do not use these methods of communication to discuss therapeutic content and/or request assistance for emergencies.

12. Services by electronic means, including but not limited to telephone communication, the Internet, facsimile machines, and e-mail is considered telehealth by the State of Nevada. Telehealth is broadly defined as the use of information technology to deliver medical services and information from one location to another. If you and your therapist chose to use information technology for some or all of your treatment, you need to understand that:

(1) You retain the option to withhold or withdraw consent at any time without affecting the right to future care or treatment nor

Client: Brayden Bellisario

DOB: 01/15/2015

risking the loss or withdrawal of any program benefits to which you would otherwise be entitled.

(2) All existing confidentiality protections are equally applicable.

(3) Your access to all medical information transmitted during a telemedicine consultation is guaranteed, and copies of this information are available for a reasonable fee.

(4) Dissemination of any of your identifiable images or information from the telemedicine interaction to researchers or other entities shall not occur without your consent.

13. There are potential risks, consequences, and benefits of telemedicine. Potential benefits include, but are not limited to improved communication capabilities, providing convenient access to up-to-date information, consultations, support, reduced costs, improved quality, change in the conditions of practice, improved access to therapy, better continuity of care, and reduction of lost work time and travel costs. Effective therapy is often facilitated when the therapist gathers within a session or a series of sessions, a multitude of observations, information, and experiences about the client. Therapists may make clinical assessments, diagnosis, and interventions based not only on direct verbal or auditory communications, written reports, and third person consultations, but also from direct visual and olfactory observations, information, and experiences. When using information technology in therapy services, potential risks include, but are not limited to the therapist's inability to make visual and olfactory observations of clinically or therapeutically potentially relevant issues such as: your physical condition including deformities, apparent height and weight, body type, attractiveness relative to social and cultural norms or standards, gait and motor coordination, posture, work speed, any noteworthy mannerism or gestures, physical or medical conditions including bruises or injuries, basic grooming and hygiene including appropriateness of dress, eye contact (including any changes in the previously listed issues), sex, chronological and apparent age, ethnicity, facial and body language, and congruence of language and facial or bodily expression. Potential consequences thus include the therapist not being aware of what he or she would consider important information, that you may not recognize as significant to present verbally the therapist.

I read have and understand all sections under PART I, my rights as a client.

Signed by Emily Bellisario on 04/27/2020, 12:46 PM (PDT) with IP address 68.227.16.91

PART II: THE THERAPEUTIC PROCESS

Therapy will seek to meet goals established by all persons involved, usually revolving around a specific presenting problem. A major benefit that may be gained from participating in therapy includes a better ability to handle or cope with marital, family, and other interpersonal relationships. Another possible benefit may be a greater understanding of family and personal goals and values; that may lead to greater maturity and happiness in an individual and increased relational harmony. Other benefits relate to the probable outcomes resulting from resolving specific concerns brought to therapy.

In working to achieve these potential benefits; however, therapy will require that firm effort be made to change and may involve the experiencing of significant discomfort. Therapeutically resolving unpleasant events and relationship patterns can arouse intense feelings. Seeking to resolve problems can similarly lead to discomfort as well as relationship changes that may not be originally intended.

TERMINATION

Ending relationships can be difficult. Therefore, it is important to have a termination process in order to achieve some closure. The appropriate length of the termination depends on the length and intensity of the treatment. I may terminate treatment after appropriate discussion with you and a termination process if I determine that psychotherapy is not being effectively used or if you are in default on payment. I will not terminate the therapeutic relationship without first discussing and exploring the reasons and purpose of terminating. If therapy is terminated for any reason or you request another therapist, I will provide you with a list of qualified psychotherapists to treat you. You may also choose someone on your own or from another referral source.

Should you fail to attend a scheduled appointment for three consecutive sessions, unless other arrangements have been made in advance, for legal and ethical reasons, I must consider the professional relationship discontinued.

I have read and understand all sections under PART II, The Therapeutic Process.

Signed by Emily Bellisario on 04/27/2020, 12:46 PM (PDT) with IP address 68.227.16.91

PART III: INFORMED CONSENT FOR PSYCHOTHERAPY FOR MINORS (ALL CLIENTS MUST GIVE THEIR INFORMED CONSENT PRIOR TO TREATMENT)

By signing this form, you are consenting to receive services from Skye Canyon Counseling. The type of services you and/or your child receive will be determined following an initial evaluation and may change throughout the course of treatment. The goal of the initial assessment and additional recommendations is to determine the best course of treatment for you and/or your child. Initial and subsequent recommendations will be discussed thoroughly with you. NOTE: Treatment with minors almost always entails the therapist work with the child's parent(s) in some capacity. Therefore, you as the parent, are also providing consent to

Client: Brayden Bellisario

DOB: 01/15/2015

participate in treatment.

Child's Name:

brayden bellisario

Parent's name (Name of parent signing consent for treatment):

Brayden Bellisario

Please provide name and phone number of child's other parent, if possible. (Note: The therapist will not contact the other parent, a phone number is required for emergency purposes only).

309 3976733

Do both parents provide consent for treatment?

 • Yes

I hereby acknowledge that I am the legal guardian of the above-named minor child and do consent to the provision of counseling services to the child at Skye Canyon Counseling. I understand that while counseling is generally confidential, where there is risk of harm to self or others, child abuse, or other legal requirements, the counselor may be required to release information to protect clients or others. I understand that in order to provide service in accord with the highest ethical and legal guidelines and to ensure the highest quality of service, the above information complies with state law, federal privacy acts, and professional ethical standards.

I hereby acknowledge that I have received information regarding informed consent for psychotherapy for myself and/or for my child. I have had time to study the information and to ask any questions that I want to ask concerning the proposed treatment/services.

I have read and understand all paragraphs listed under Part III: Informed Consent for Psychotherapy for Minors, and provide consent for treatment and therapeutic services.

Signed by Emily Bellisario on 04/27/2020, 12:46 PM (PDT) with IP address 68.227.16.91

PART V: INFORMED CONSENT FOR AUDIO AND/OR VIDEO RECORDING

I request your permission to audio and/or video record our counseling session(s). Note: It is unlikely that every session will be recorded, and I will inform you ahead of time. The purpose of this recording is to help me serve you better and to review and evaluate my counseling techniques. No recording will be done without your prior knowledge and consent. Viewers of the audio and/or video file(s) may include supervisors and peers in group supervision meetings. All viewers of the audio and/or video file(s) are bound by the ethical standards of the American Association of Marriage and Family Therapy (AAMFT) and the American Counseling Association (ACA). The audio and/or video file(s) will be treated with confidentiality and will be destroyed no later than 90 days after the date your counseling session is recorded.

Please select one of the following:

- I DO provide consent for audio and/or video recording

By signing below, you acknowledge that you have read and understand the Informed Consent for Audio and/or Video Recording and that you do or do not permit me to audio and/or video record our session(s) and review the audio and/or video file(s) with the aforementioned individuals for the aforementioned purposes.

Signed by Emily Bellisario on 04/27/2020, 12:46 PM (PDT) with IP address 68.227.16.91

PART VII: FEES AND LENGTH OF THERAPY

1. I agree to enter into therapy. I agree to pay \$100.00 for each session, unless another payment agreement has been made. Note: Payment agreements will be annotated by therapist in your case file. Payment is due at the end of each session, and no balance will be carried.

2. Certified Alcohol Drug Counselor (CADC)/Licensed Alcohol and Drug Counselor (LADC) clients: I agree to enter into therapy. I agree to pay \$200 for an initial assessment and \$100 per session for subsequent sessions, unless another payment agreement has been made. Note: Payment agreements will be annotated by therapist in your case file. Payment is due at the end of each session, and no balance will be carried.

Client: Brayden Bellisario

DOB: 01/15/2015

3. I understand that I can leave therapy at any time and that I have no moral, legal, or financial obligation to complete the maximum number of sessions listed in this contract; I am contracting only to pay for completed therapy sessions.

4. A 24-hour notice is required for cancellation of a scheduled session. If I do not meet this requirement, I agree to pay the full session fee. I understand that this will be my responsibility, not that of the third-party payer.

5. I understand that the therapist has the right to seek legal recourse to recoup any unpaid balance. In pursuing these measures, the therapist will only disclose biographical information and the amount owed, in order to ensure confidentiality.

6. A \$25.00 service fee be charged for any checks returned for any reason for special handling.

7. ADDITIONAL FEES

Text-messages, phone-calls, and emails should be limited to discussing administrative items, such as scheduling. Services that require my involvement outside of your scheduled session are subject to a minimum \$20 fee for any amount of time. Additional services that are 60 minutes or longer are subject to a \$100.00 fee per hour (or the agreed upon session fee). Please note that the time required to conduct research, review documents, collaborate with outside agencies, and organize notes and records is much more involved than for therapeutic treatment alone.

I read have, understand, and agree to all paragraphs listed under PART VI, Fees and Length of Therapy.

Signed by Emily Bellisario on 04/27/2020, 12:46 PM (PDT) with IP address 68.227.16.91

SUBMIT

I acknowledge that I have read have and understand all sections of this document. Any questions or concerns have been directly addressed with therapist.

Signed by Emily Bellisario on 04/27/2020, 12:46 PM (PDT) with IP address 68.227.16.91

EXHIBIT E

Message: 180 of 731**Date:** 05/22/2020 11:28 AM**From:** Bradley Bellisario**To:** Emily Bellisario (First View: 05/22/2020 11:34 AM)**Subject:** RE: Brayden

You're withholding Brayden once again unless I do something you want. Brayden asks to spend the night. He tells me he wants to come over every day but mommy won't let him. He has no issues being with me, he enjoys himself a lot over here. What therapist is that who you had a discussion about having overnights?

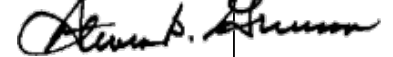
As per our agreement through my attorney and your prior lawyers, I agreed to having Brayden go to a therapist, but NOT Donna Wilburn. To my knowledge Brayden went to her three (3) times, unless she saw and treated Brayden specifically after acknowledging my withdraw of consent. As far as the other therapists you sent over, I'm sure they were names given to you by Donna since Donna is friends with Anna Trujillo. So Trujillo is a hard no, I can't find anything on Cindy Osborn, but I'd assume she's a referral from Donna as well. Much like Donna is friends with Jason Stoffel who coincidentally is the husband of your new attorney and partner in their law firm. If you would let me know the health insurance company you have I'll be glad to look over providers included in network and give a few suggestions after researching a few.

Message: 181 of 731**Date:** 05/22/2020 10:54 AM**From:** Emily Bellisario**To:** Bradley Bellisario (First View: 05/22/2020 11:08 AM)**Subject:** Brayden

I would love for you to have an overnight with Brayden once you agree to a therapist. Brayden has been seen by the therapist, and we have had a discussion with the therapist regarding you having overnights. Let's agree to one today so he can be seen hopefully next week. Since Donna has already built the trust with him I think she would be great for Brayden to go to. If not I sent you over a few others to review please consider them. And If you would like more time with Brayden how about we move this Sunday's pick up to 6:30 instead of 4:30 so you get a few extra hours with him this weekend?

Message: 182 of 731**Date:** 05/21/2020 12:11 PM**From:** Bradley Bellisario**To:** Emily Bellisario (First View: 05/22/2020 10:54 AM)**Subject:** Brayden this weekend.

Pursuant to our agreement we're supposed to increase my time with Brayden. Brayden has expressed he wants to come over more but you don't let him. This weekend can I get him on Saturday and bring him back on Sunday with the girls?



1 **NDEP**
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*

DISTRICT COURT
CLARK COUNTY, NEVADA

9 EMILY BELLISARIO,
10
11 Plaintiff,

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

12 vs.

**NOTICE OF DEPOSITION – EMILY
BELLISARIO**

13 BRADLEY BELLISARIO,
14
15 Defendant

16 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

17 PLEASE TAKE NOTICE that at 9:00 a.m. on the 22nd Day of June, 2021, Defendant,
18 pursuant to NRCP 30, will take the deposition of EMILY BELLISARIO at the Regus Offices
19 located at 170 South Green Valley Parkway, Suite 300, Henderson, Nevada 89102.

20 The deposition will be taken upon oral examination before a certified court reporter or
21 other officer authorized by the court to administer oaths. The oral examination will continue day
22 to day until completed.

23 DATED this 21st day of May 2021.

24 BY: /s/ Bradley Bellisario

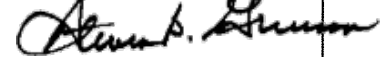
25 Bradley Bellisario
26 *Plaintiff Pro Se*
27 7100 Grand Montecito Pkwy, #2054
28 Las Vegas, NV 89149
T: 309.397.6734
E: bradb@bellisariolaw.com

NOTICE OF DEPOSITION – EMILY BELLISARIO - 1

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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 **OPPC**

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.

) **OPPOSITION TO DEFENDANT'S**

) **MOTION FOR ORDER PURSUANT**

16 BRADLEY BELLISARIO,

) **TO NRS 200.359 (PARENTAL**

) **KIDNAPPING BY PLAINTIFF); AND**

17 Defendant.

) **COUNTERMOTION TO DEEM**

) **DEFENDANT VEXATIOUS**

) **LITIGANT AND FOR AN AWARD OF**

) **ATTORNEY'S FEES AND COSTS.**

18)

19) Date of Hearing: July 7, 2021

20) Time of Hearing: 10:00 a.m.

21)

) *Oral Argument Requested: Yes*

22)

23 **MEMORANDUM OF POINTS AND AUTHORITIES**

24 **I.**

25 **Issues**

- 26 1. Bradley's request for an Order deeming Emily to have engaged in
27 parental kidnapping should be denied.

2. Emily's request for Bradley to be deemed a vexatious litigant should be granted.
3. Emily's request for an award of attorney's fees and costs should be granted.
4. For any and all other relief the Court deems proper and just.

II. Statement of Facts

The Parties to this action, the Plaintiff, Emily Bellisario ("Emily") and the Defendant, Bradley Bellisario ("Bradley"),¹ were married on August 16, 2014. The Parties have three (3) minor children, to wit: Brayden Bellisario ("Brayden"), born January 15, 2015; Blake Bellisario ("Blake"), born November 20, 2016; and Brooklyn Bellisario ("Brooklyn"), February 1, 2018.

In this matter, Bradley continues to argue the same set of facts in almost each and every Motion that he files. The issues here relate to the custodial Orders. Presently, on a temporary basis, the Parties have joint legal custody with Emily having superior custodial rights regarding the medical care of the minor children; and Emily has primary physical custody and Bradley having supervised visitation. Most recently, Bradley's visitation was moved from Donna's House to Family First because Bradley "exploded" including cursing, invading personal space of staff, disrupting other families, causing staff to cry. All the while, Blake and Brooklyn

¹ Bradley is a licensed attorney in the State of Nevada. Bradley has been licensed since December 15, 2014.

1 were witnessing these events. Bradley had to be escorted from Donna's House and
2 was driving erratically throughout the parking lot exiting the courthouse.

3
4 Since this action commenced, Bradley has filed at least two (2) civil actions
5 against Emily and has filed nineteen (19) Motions in this matter. Each and every
6 time Bradley takes legal action whether filing of a separate matters or filing of
7 Motions, Emily is forced to file responses to avoid Bradley's requests being granted
8 by lack of Opposition/failure to plead. As such, Bradley has significantly increased
9 Emily's litigation costs and she has an outstanding bill with her Counsel of over
10 \$15,000.00. Moreover, despite not complying with *NRCP* § 16.2, Bradley has
11 served significant discovery upon Ms. Roberts' office.
12

13
14 *Compliance with EDCR § 5.501*

15 In this matter, Bradley has failed to comply with *EDCR* § 5.501.

16
17 As for Emily's requests for relief herein, she did not attempt to gain
18 Bradley's cooperation in this regard because it would have been futile and
19 impracticable. Communicating with Bradley about any aspect of this matter is
20 extremely difficult and his behavior toward Ms. Roberts and her staff is
21 inappropriate and harassing. Bradley refers to Ms. Roberts and her staff in
22 inappropriate terms, he raises his voice during calls, uses profanity, etc. As such,
23 communicating with him about this issue was impracticable.
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III.
Opposition

A. Bradley's request for an Order to deem Emily to have engaged in parental kidnapping should be denied.

NRS § 200.359 (1) states,

A person having a limited right of custody to a child by operation of law or pursuant to an order, judgment or decree of any court, including a judgment or decree which grants another person rights to custody or visitation of the child, or any parent having no right of custody to the child, who:

(a) In violation of an order, judgment or decree of any court willfully detains, conceals or removes the child from a parent, guardian or other person having lawful custody or a right of visitation of the child; or

(b) In the case of an order, judgment or decree of any court that does not specify when the right to physical custody or visitation is to be exercised, removes the child from the jurisdiction of the court without the consent of either the court or all persons who have the right to custody or visitation, is guilty of a category D felony and shall be punished as provided in NRS 193.130.

Based upon the foregoing, Bradley's request must be denied. Emily does not have a limited right to custody. Therefore, Bradley's request is brought without cause. The Party with a limited right to custody in this matter is Bradley.

IV.
Counter motion

A. Emily's request for Bradley to be deemed a vexatious litigant should be granted.

Although the Court previously denied this request, Bradley has filed two (2) civil cases and nineteen (19) Motions within approximately 12 months since this

1 litigation commenced, plus has threatened at least two (2) additional Motions.²

2 Bradley's Motions lack merit and are simply an attempt to run up Emily's legal fees
3
4 to leave her without Counsel to defend herself here and in the civil litigations. This
5 Court is allowing Bradley's behavior by not taking stronger action in this regard!

6 In *Jordan v. State ex rel. Dep't of Motor Vehicles & Pub. Safety*, 121 Nev.
7
8 44, 60, 110 P.3d 30, 42-44 (2005), abrogated on other grounds by *Buzz Stew, LLC*
9 *v. City of N. Las Vegas*, 124 Nev. 224, 181 P.3d 670 (2008), the Nevada Supreme
10 Court set forth a four-step process to deem someone a vexatious litigant. The steps
11 are as follows:

- 12
13 1. Reasonable notice to litigant and opportunity to oppose the issuance
14 of a restrictive Order to protect the Due Process rights of the
15 litigant.
- 16 2. The District Court must create a record for review which includes
17 listing all cases and documents which led to the conclusion that a
18 restrictive Order was necessary to "curb repetitive or abusive
19 activities."
- 20 3. The District Court must make findings that support the "frivolous
21 and harassing nature" of the actions.
- 22 4. The Order must be narrowly drawn as not to prohibit access to the
23 legal system.

24 Additionally, *EDCR* § 7.60 (b) provides,

25
26 The court may, after notice and an opportunity to be
27 heard, impose upon an attorney or a party any and all
28 sanctions which may, under the facts of the case, be
reasonable, including the imposition of fines, costs or

² This does not even include the other civil actions filed by Bradley relating to other professionals associated with this case, including attorneys of Emily and therapist.

1 attorney's fees when an attorney or a party without just
2 cause:

- 3 (1) Presents to the court a motion or an opposition to a
4 motion which is obviously frivolous, unnecessary or
5 unwarranted.
- 6 (2) Fails to prepare for a presentation.
- 7 (3) So multiplies the proceedings in a case as to increase
8 costs unreasonably and vexatiously.
- 9 (4) Fails or refuses to comply with these rules.
- 10 (5) Fails or refuses to comply with any order of a judge
11 of the court.

12 In this matter, anybody who engages with Emily including family and
13 professionals- therapists and attorneys, has been subject to litigation by Bradley.
14 As set forth herein, since the commencement of this action, Bradley has filed
15 lawsuits against Emily, Donna Wilburn, Anna Trujillo, Marathon Legal Group/Joe
16 Riccio, Roberts Law Group/Amanda Roberts. On February 4, 2021, Bradley made
17 threats of additional actions against Emily's current attorney. On or about April
18 21, 2021, Ms. Roberts received communication that Bradley is intending to fight
19 the process of the psychological evaluation with Dr. Holland, including filing a
20 Motion to Set Aside the Order from that hearing. Moreover, on April 22, 2021,
21 Bradley threatened to file a Motion regarding visitation that was missed regarding
22 Emily's inability to pay the fees.

23 B. Emily's request for an award of attorney's fees and costs should be
24 granted.

25 Emily was forced to defend herself against Bradley's instant Motion, which
26 did not need to be filed. Bradley's instant Motion is without merit and should be
27

1 denied. Additionally, Bradley failed to attempt to resolve the issues presented in
2 his Motion in accordance with *EDCR* §5.501, and is not expected to be the
3 prevailing Party; therefore, he is not entitled to any award of attorney's fees or
4 costs. To the contrary, Emily was forced to defend herself with this Opposition,
5 has following the Court's Orders, rules and guidelines, and is expected to be the
6 prevailing Party, in accordance with *NRS* §18.010.
7

8
9 When dealing with attorney fees the Nevada Supreme Court has issued a
10 litany of relevant cases including the holding in *Sargeant v. Sargeant*, 88 Nev. 223,
11 495 P.2d 618 (1972). In *Sargeant*, the Nevada Supreme Court considered a wife's
12 award of attorney fees. The husband argued the attorney fees were excessive and
13 should not have been granted from the husband's sole and separate property. The
14 Court determined that "[t]he wife must be afforded her day in court without
15 destroying her financial position." This would imply that she should be able to
16 meet her adversary in the courtroom on an equal basis." {EMPHASIS ADDED}
17

18
19 In *Wright v. Osburn*, 114 Nev. 1367, 970 P.2d 1071 (1998), the Nevada
20 Supreme Court indicated that "disparity in income is also a factor to be considered
21 in awarding attorney fees." In this matter, the Court issued a finding that Bradley's
22 income is \$18,000.00 per month (*see Order* filed January 24, 2021). In contrast,
23 Emily's income is \$980.97 per month without taking consideration child support
24 and spousal support which is not being paid by Bradley, although Ordered.
25
26
27
28

1 Therefore, it is alleged that the disparity in income is significant to require
2 Bradley's to pay attorney fees and costs.

3
4 One of the prevailing cases regarding attorney fees is *Brunzell v. Golden*
5 *Gate National Bank*, 85 Nev. 345, 455 P.2d 31 (1969). In *Brunzell* the Nevada
6 Supreme Court set forth the factors, now known as the Brunzell Factors, which the
7 Court considered "well known basic elements to be considered" when awarded
8 attorney fees. According the Brunzell Factors are as follows:
9

- 10 1. The quality of advocacy;³
- 11 2. The character of the work to be done;⁴
- 12 3. The work actually performed by the lawyer;⁵ and
- 13 4. The results obtained.

14 **Quality of Advocacy**

15 Emily's Counsel has been practicing law since 2005 and focuses her practice
16 area primarily in the area of family law, and she is in good standing with the State
17 Bar of Nevada. Emily's Counsel participated in a weekly radio show geared at the
18 Clark County community, focused on issues relative to family law.
19

20
21 Yearly, Emily's Counsel attends continuing legal education classes to stay
22 abreast of changes in the area of family law. Through a practice primarily in family

23 ³ When considering the quality of the advocacy the Court should look at the attorney's ability,
24 training, education, professional standing, and skill.

25 ⁴ 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 ⁵ When considering the work performed the Court should consider the skill, time, and attention
given to the work.

1 law, Emily's Counsel has drafted countless Motions, argued before the District
2 Court and Hearing Master on issues related to domestic violence/custody/
3 divorce/adoption/termination of parental rights, brought and defended individuals at
4 Trials and Evidentiary Hearings. Additionally, Emily's Counsel has taken cases on
5 Appeal to the Supreme Court of Nevada.
6

7
8 **Character of Work Done**

9 Due to the fact that Emily's Counsel practices primarily in the area of family
10 law, she has regularly dealt with issues involved in violations of terms of Family
11 Court related Orders, child support enforcement, arrears, and wage assignments.
12

13 **Work Performed**

14 Emily's Counsel maintains a billing system and will prepare, in advance of
15 the hearing in this matter, a billing statement to address the actual attorney fees
16 extended by Emily relative to the Motion and hearing. Emily is billed at a rate of
17 \$350.00 per hour which is a rate on par with other attorneys practicing primarily in
18 the area of family law.
19

20 Based upon the foregoing, Emily should be awarded attorney's fees and
21 costs, in an amount incurred by Emily related to Bradley's Motion and this
22 Opposition.
23

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V.
Conclusion

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

1. Denying Bradley’s request for an Order deeming Emily to have engaged in parental kidnapping;
2. Granting Emily’s request for Bradley to be deemed a vexatious litigant.
3. Granting Emily’s request for an award of attorney’s fees and costs.
4. For any and all other relief the Court deems proper and just.

DATED this 2nd day of June, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: /s/ 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

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DECLARATION OF EMILY BELLISARIO

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

1. I am the Plaintiff in the above entitled action and am competent to testify to the matters contained herein. Declarant makes this declaration in support of her Opposition and Countermotion.

2. I have read the foregoing Opposition and Countermotion and can certify and attest that the facts contained therein are true of Declarant's own knowledge, except for those matters stated upon information and belief, and as to those matters, Declarant believes them to be true.

3. Declarant incorporates all the facts of the Opposition and Countermotion into this declaration as though fully set forth herein.

FURTHER DECLARANT SAYETH NAUGHT.

Dated this 2nd day of June, 2021.

/s/ Emily Bellisario
Emily Bellisario

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group,
and on the 2nd day of June, 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
Opposition and Countermotion, to the following:

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

By: /s/ Shayna Hall
Employee of Roberts Stoffel Family Law Group

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Emily Bellisario

Plaintiff/Petitioner

Bradley Bellisario

Defendant/Respondent

Case No. D-20-605263-D

Dept. P

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

Notice: Motions and Oppositions filed after entry of a final order issued pursuant to NRS 125, 125B or 125C are subject to the reopen filing fee of \$25, unless specifically excluded by NRS 19.0312. Additionally, Motions and Oppositions filed in cases initiated by joint petition may be subject to an additional filing fee of \$129 or \$57 in accordance with Senate Bill 388 of the 2015 Legislative Session.

Step 1. Select either the \$25 or \$0 filing fee in the box below.

<input type="checkbox"/>	\$25	The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
-OR-		
<input checked="" type="checkbox"/>	\$0	The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
<input checked="" type="checkbox"/>		The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
<input type="checkbox"/>		The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
<input type="checkbox"/>		The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on _____.
<input type="checkbox"/>		Other Excluded Motion (must specify) _____.

Step 2. Select the \$0, \$129 or \$57 filing fee in the box below.

<input checked="" type="checkbox"/>	\$0	The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
<input checked="" type="checkbox"/>		The Motion/Opposition is being filed in a case that was not initiated by joint petition.
<input type="checkbox"/>		The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
-OR-		
<input type="checkbox"/>	\$129	The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.
-OR-		
<input type="checkbox"/>	\$57	The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

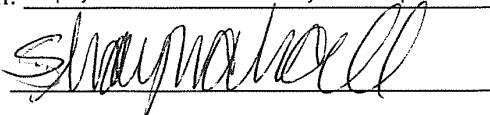
Step 3. Add the filing fees from Step 1 and Step 2.

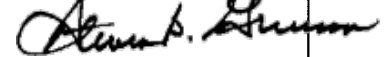
The total filing fee for the motion/opposition I am filing with this form is:											
<input checked="" type="checkbox"/>	\$0	<input type="checkbox"/>	\$25	<input type="checkbox"/>	\$57	<input type="checkbox"/>	\$82	<input type="checkbox"/>	\$129	<input type="checkbox"/>	\$154

Party filing Motion/Opposition: Employee of Roberts Stoffel Family Law Group

Date 6/2/2021

Signature of Party or Preparer





1 **NOTC**

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

4 **ROBERTS STOFFEL FAMILY LAW GROUP**

5 4411 South Pecos Road
6 Las Vegas, Nevada 89121

7 PH: (702) 474-7007

8 FAX: (702) 474-7477

9 EMAIL: efile@lvfamilylaw.com

10 Attorney for Plaintiff, Emily Bellisario

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

13 EMILY BELLISARIO,

14 Plaintiff,

15 v.

16 BRADLEY BELLISARIO,

17 Defendant.

) Case No: D-20-605263-D

) Dept No: P

) **NOTICE OF DISCOVERY**
) **DISPUTE CONFERENCE**

18 NOTICE IS HEREBY GIVEN pursuant to Eighth Judicial District Court

19 Rule § 5.602, your attendance is required for a Discovery Dispute Conference

20 which has been set for the 14th day of April, 2021, at 9:00 a.m., via telephone at

21 (702) 474-7007 in accordance with social distancing measures pursuant to

22 directions from the Court's Administrative Orders. *It is your responsibility to*

23 *contact the firm at the designated time.*

24 \\\

25 \\\

1 If you cannot attend the Discovery Dispute Conference due to a conflict,
2 please notify Plaintiff's Counsel in writing, prior to the scheduled time set herein,
3 to reschedule.
4

5 Dated this 10th day of June, 2021.

6 **ROBERTS STOFFEL FAMILY LAW GROUP**

7
8 By: /s/ Amanda M. Roberts, Esq.

9 Amanda M. Roberts, Esq.
10 State Bar of Nevada No. 9294
11 4411 South Pecos Road
12 Las Vegas, Nevada 89121
13 PH: (702) 474-7007
14 FAX: (702) 474-7477
15 EMAIL: efile@lvfamilylaw.com
16 Attorney for Plaintiff, Emily Bellisario
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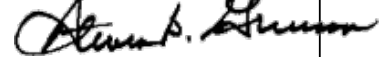
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group,
and on the 10 day of June, 2021, I served by and through Wiz-Net electronic
service, pursuant 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 Plaintiff's
Notice of Discovery Dispute Conference, to the following:

Bradley Bellisario
Email: bradb@bellisariolaw.com
Defendant

By: 
Employee of Roberts Stoffel Family Law Group



1 **NOTC**

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

4 **ROBERTS STOFFEL FAMILY LAW GROUP**

5 4411 South Pecos Road
6 Las Vegas, Nevada 89121

7 PH: (702) 474-7007

8 FAX: (702) 474-7477

9 EMAIL: efile@lvfamilylaw.com

10 Attorney for Plaintiff, Emily Bellisario

11 **DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 EMILY BELLISARIO,

14 Plaintiff,

15 v.

16 BRADLEY BELLISARIO,

17 Defendant.

) Case No: D-20-605263-D

) Dept No: P

) **AMENDED NOTICE OF**
) **DISCOVERY DISPUTE**
) **CONFERENCE**

18 NOTICE IS HEREBY GIVEN pursuant to Eighth Judicial District Court

19 Rule § 5.602, your attendance is required for a Discovery Dispute Conference

20 which has been set for the **14th day of June, 2021**, at **9:00 a.m.**, via telephone at

21 (702) 474-7007 in accordance with social distancing measures pursuant to

22 directions from the Court's Administrative Orders. *It is your responsibility to*

23 *contact the firm at the designated time.*

24 \ \ \

25 \ \ \

1 If you cannot attend the Discovery Dispute Conference due to a conflict,
2 please notify Plaintiff's Counsel in writing, prior to the scheduled time set herein,
3 to reschedule.
4

5 Dated this 11th day of June, 2021.

6 **ROBERTS STOFFEL FAMILY LAW GROUP**

7
8 By: /s/ Amanda M. Roberts, Esq.
9 Amanda M. Roberts, Esq.
10 State Bar of Nevada No. 9294
11 4411 South Pecos Road
12 Las Vegas, Nevada 89121
13 PH: (702) 474-7007
14 FAX: (702) 474-7477
15 EMAIL: efile@lvfamilylaw.com
16 Attorney for Plaintiff, Emily Bellisario
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**DISTRICT COURT
CLARK COUNTY, NEVADA****Divorce - Complaint****COURT MINUTES****June 16, 2021**

D-20-605263-D Emily Bellisario, Plaintiff
vs.
Bradley John Bellisario, Defendant.

June 16, 2021 10:00 AM All Pending Motions

HEARD BY: Perry, Mary **COURTROOM:** Courtroom 23

COURT CLERK: Medina, Kyle

PARTIES PRESENT:

Emily Bellisario, Counter Defendant, Plaintiff, Present Amanda M Roberts, ESQ, Attorney, Present

Bradley John Bellisario, Counter Claimant, Defendant, Present Pro Se

Brayden Bellisario, Subject Minor, Not Present

Blake Bellisario, Subject Minor, Not Present

Brooklyn Bellisario, Subject Minor, Not Present

JOURNAL ENTRIES

MOTION: DEFENDANT'S MOTION FOR ORDER TO SHOW CAUSE...MOTION: OPPOSITION TO DEFENDANT'S MOTION FOR AN ORDER TO CAUSE WHY PLAINTIFF AND PLAINTIFF'S COUNSEL, AMANDA ROBERTS, ESQ., SHOULD NOT BE HELD IN CONTEMPT OF COURT; AND COUNTERMOTION FOR AN AWARD OF ATTORNEY'S FEES AND COSTS..

In the interest of public safety due to the Coronavirus pandemic, all parties were present via VIDEO CONFERENCE through the BlueJeans application.

Defendant put under OATH. Court noted that the Motion has been reviewed and the parties stated they have nothing further to add to the Motions. Court further discussed the amount of funds in the Trust account and the Orders from Attorney Roberts that are outstanding.

COURT ORDERED the following:

The Motion for an Order to show cause is DENIED.

The accountant and receiver shall receive and shall be able to review the Trust account.

Attorney Roberts shall submit the Order from May 11, 2021 and May 18, 2021 to the Court along with a schedule of arrears.

Attorney Roberts shall file a memorandum of fees and costs and shall have ten days to submit it. The Defendant shall file his objection and the Court will review it.

The Minute Order shall suffice, and a written Order is not required.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Jul 07, 2021 10:00AM Motion
Courtroom 23 Perry, Mary

Jul 07, 2021 10:00AM Opposition & Countermotion
Courtroom 23 Perry, Mary

Sep 16, 2021 9:00AM Return Hearing
Courtroom 23 Perry, Mary

1 **TRANS**

2
3 **ORIGINAL**

FILED
AUG 19 2021
Amanda M. Roberts
CLERK OF COURT

4
5 **EIGHTH JUDICIAL DISTRICT COURT**
6 **FAMILY DIVISION**
7 **CLARK COUNTY, NEVADA**
8

9 EMILY BELLISARIO,)
10 Plaintiff,)
11 vs.)
12 BRADLEY JOHN BELLISARIO,)
13 Defendant.)

CASE NO. D-20-605263-D
DEPT. P

14
15 BEFORE THE HONORABLE MARY PERRY
DISTRICT COURT JUDGE

16 TRANSCRIPT RE: ALL PENDING MOTIONS

17 WEDNESDAY, JUNE 16, 2021

18 APPEARANCES:

19 (PARTICIPANTS APPEAR VIRTUALLY)

20 The Plaintiff: EMILY BELLISARIO
21 For the Plaintiff: AMANDA M. ROBERTS, ESQ.
22 4411 S. Pecos Rd.
Las Vegas, Nevada 89121
(702) 474-7007
23 The Defendant: BRADLEY JOHN BELLISARIO, ESQ.
24 For the Defendant: PRO SE

1 LAS VEGAS, NEVADA

WEDNESDAY, JUNE 16, 2021

2 P R O C E E D I N G S

3 (THE PROCEEDINGS BEGAN AT 9:53:44)

4

5 THE CLERK: We're on, Judge.

6 THE COURT: All right. Good morning. We are on the
7 record in case number D-20-605263-D, Bellisario versus
8 Bellisario. May I please have your appearance, Ms. Roberts?

9 MS. ROBERTS: Amanda Roberts, bar number 9294, on
10 behalf of the Plaintiff Emily Bellisario who is present via
11 BlueJeans.

12 THE COURT: All right. Thank you. Mr. Bellisario,
13 how are you doing today?

14 THE DEFENDANT: I'm okay. Thank you.

15 THE COURT: All right. Okay. I've been told that I
16 have to start putting everyone even if you're a licensed
17 attorney, who -- you know, if you're in pro per, I got to put
18 you under oath, sir. I apologize, because I still believe
19 you're an officer of the court. So but I still need to put
20 you under oath.

21 THE DEFENDANT: Okay.

22 THE COURT: Raise your right hand, please. You do
23 solemnly swear the testimony you're about to give in this
24 action shall be the truth, the whole truth, and nothing but

1 the truth, so help you God?

2 THE DEFENDANT: I do.

3 THE COURT: All right. Thank you, sir. Okay. I
4 have read everything. Do you have anything new to add, Mr.
5 Bellisario?

6 THE DEFENDANT: I mean, there's been more missed
7 visits with Brayden and like trying to get the information
8 regarding the therapist, stuff like that. They continue to
9 not give him to me for a month. And finally (indiscernible)
10 yesterday but it's a different story all day. So I'm trying
11 --

12 THE COURT: Okay.

13 THE DEFENDANT: -- to get those records.

14 THE COURT: This -- this is on -- this is on the
15 motion to hold Ms. Roberts in contempt.

16 THE DEFENDANT: Okay. Nothing else from that
17 motion.

18 THE COURT: Nothing else from that motion. Okay.
19 Ms. Roberts, do you have anything new that you want to add?

20 MS. ROBERTS: No, Your Honor.

21 THE COURT: Okay. Right now, at this point, I am
22 not finding that anybody is in contempt. So I'm denying the
23 order to show cause. On this, this is something that needs to
24 be done. And I realize you were going to want to do a motion

1 for reconsideration. That motion for reconsideration was
2 probably going to be denied because there is a good
3 possibility you're hiding money in that trust account.

4 THE DEFENDANT: Nope.

5 THE COURT: I -- yeah -- yeah, but I'm -- I'm going
6 to afford her the right to look at it. It's not going to be
7 for pretty much any other purpose other than making sure that
8 the monies that are in there is actual client funds. And then
9 all those documents will be shredded at that point.

10 MS. ROBERTS: So they will be given, Your Honor,
11 though to the receiver and the --

12 THE COURT: Correct.

13 MS. ROBERTS: -- accountant --

14 THE COURT: Correct.

15 MS. ROBERTS: -- that you have appointed. Yes.

16 THE COURT: Correct. I want --

17 MS. ROBERTS: That's fine, Your Honor.

18 THE COURT: -- the receiver and the accountant to --
19 and the accountant to be the ones who receives that, looks at
20 it. Ms. Roberts, I really don't want you to peruse through it
21 and look at it. It's going to be up to the receiver. Okay?

22 THE DEFENDANT: Also, I don't think we have an order
23 from the May 18th hearing yet.

24 THE COURT: Okay.

1 THE DEFENDANT: This --
2 THE COURT: Well --
3 THE DEFENDANT: That's --
4 MS. ROBERTS: There is an outstanding order, Your
5 Honor. My office had an issue with COVID.
6 THE COURT: Yeah.
7 MS. ROBERTS: I will have that order submitted. We
8 were waiting for records from my client to do the updated
9 schedule of arrears. So I will just file the schedule of
10 arrears once I get those records and then do a subsequent
11 order pertaining to the --
12 THE COURT: Okay.
13 MS. ROBERTS: -- reducing (indiscernible).
14 THE COURT: Yes. Yes. We do -- you know, we need
15 to stay on top of these orders. I have one that's from --
16 hang on. From May 11th that is still outstanding. And
17 then --
18 MS. ROBERTS: Yes, Your Honor.
19 THE COURT: -- I have one from May 18th that is
20 outstanding.
21 MS. ROBERTS: I will check both of those.
22 THE COURT: Okay. Mr. Bellisario, you are an
23 attorney. So you know how to do orders also. If you really
24 wanted these turned in, even though I told her she could do

1 it, you -- you have the opportunity to fill out these orders
2 as well. You know, but -- but right now if I smack anybody's
3 hands it would be Amanda's. But Ms. Roberts, you are late on
4 getting me these orders. I understand about the COVID.

5 MS. ROBERTS: Yes, Your Honor. The other -- the
6 only other issue is the countermotion for attorney fees.

7 THE COURT: And I'm thinking, I really am thinking
8 about this. I think I'm going to grant it, but it's not going
9 to be probably in the amount in which you have incurred. So I
10 need a memorandum of fees and costs with your billing
11 statement and give him the opportunity to -- to oppose.

12 MS. ROBERTS: Can I have 10 days to -- to submit
13 that, Your Honor?

14 THE COURT: Yes, ma'am. You have 10 days to submit
15 it. Mr. Bellisario, you'll have the -- the time allotted by
16 rule to do your objection. I'll hang on to it and not do
17 anything until after your objection comes in. Okay?

18 MS. ROBERTS: Thank you, Your Honor, very much. And
19 I'll prepare those orders and send them over to Mr.
20 Bellisario. Thank you so much.

21 THE COURT: Thank you. Appreciate it.

22 MS. ROBERTS: Thank you, Your Honor.

23 (PROCEEDINGS CONCLUDED AT 9:58:21)
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ATTEST: I do hereby certify that I have truly and
correctly transcribed the digital proceedings in the above-
entitled case to the best of my ability.

Adrian Medrano

Adrian N. Medrano

**DISTRICT COURT
CLARK COUNTY, NEVADA****Divorce - Complaint****COURT MINUTES****June 16, 2021**

D-20-605263-D Emily Bellisario, Plaintiff
vs.
Bradley John Bellisario, Defendant.

June 16, 2021 01:00 PM All Pending Motions

HEARD BY: Young, Jay **COURTROOM:** Courtroom 20

COURT CLERK: Green, Helen

PARTIES PRESENT:

Emily Bellisario, Counter Defendant, Plaintiff, Not Present Amanda M Roberts, ESQ, Attorney, Not Present

Bradley John Bellisario, Counter Claimant, Defendant, Not Present Pro Se

Brayden Bellisario, Subject Minor, Not Present

Blake Bellisario, Subject Minor, Not Present

Brooklyn Bellisario, Subject Minor, Not Present

JOURNAL ENTRIES

MOTION FOR A PROTECTION ORDER RELATING TO BRADLEY'S DISCOVERY REQUESTS AND SUBPOENA'S, FOR AN AWARD OF ATTORNEY'S FEES AND COSTS, AND RELATED RELIEF...DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR PROTECTION ORDER RELATING TO BRADLEY'S DISCOVERY REQUEST AND SUBPOENA'S, FOR AN AWARD OF ATTORNEY'S FEES AND COSTS AND RELATED RELIEF

The Court noted that it had read the pleadings and was ready to issue the Order, however, the Court noted that it would entertain argument by counsel and also have the parties address specific issues.

Argument by counsel and Defendant.

COMMISSIONER RECOMMENDED:

With regard to the argument that Mr. Bellisario has not complied with EDCR 16.2, there is not sufficient evidence in front of the Court to suggest that he has failed to comply with that in whole or even in part. Therefore the Court is denying the motion in part and granting it in part as follows: with regard to AAA Flooring and Allied Flooring Services, Inc., the subpoena may go forward. It is limited to documents that are sufficient to prove a period of employment and wage or salary or other payment paid between August 2014 and the present. No other documentation is appropriate. So, Mr. Bellisario shall need to amend his request as it relates to those two subpoenas.

The Motion is DENIED as to the Nevada Board of Examiners. Credibility of a witness is a valid pursuit of Discovery.

The Motion is GRANTED as it relates to the Nevada State Bar.

The Motion is DENIED as to Bank of America, all subpoenas, J&A Consulting Group, Johnson Martin Advisors, Chase Bank, LVMPD, Wells Fargo, and Nevada State Bank.

The Request for Fees is DENIED.

Attorney Roberts shall prepare the Report and Recommendation and Mr. Bellisario shall review and sign off as to form and content and file it with the Court within the next 14 days to avoid a sanction.

Status Check SET for 7/7/21 @ 1:30 P.M. (Submission of Report and Recommendation) The parties shall not need to appear if the Report and Recommendation is submitted timely.

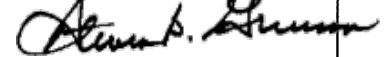
INTERIM CONDITIONS:

FUTURE HEARINGS:

Jul 07, 2021 10:00AM Motion
Courtroom 23 Perry, Mary

Jul 07, 2021 10:00AM Opposition & Countermotion
Courtroom 23 Perry, Mary

Sep 16, 2021 9:00AM Return Hearing
Courtroom 23 Perry, Mary



1 **MEMO**

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

4 **ROBERTS STOFFEL FAMILY LAW GROUP**

5 4411 South 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,

14 Plaintiff,

15 v.

16 BRADLEY BELLISARIO,

17 Defendant.

Case No: D-20-605263-D

Dept No: P

**MEMORANDUM OF FEES AND
COSTS AS ORDERED**

18 COMES NOW the Plaintiff, Emily Bellisario, by and through her attorney of
19 record, Amanda M. Roberts, Esq., of Roberts Stoffel Family Law Group, and
20 hereby files this Memorandum of Fees and Costs at the direction of the Court,
21 following the hearing held June 16, 2021.

22 \\\

23 \\\

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26 \\\

1 In Nevada, it would be appropriate for the Court to consider the holding in
2 *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31 (1969), which
3 provides the Court should consider four (4) factors when awarding attorney fees.
4 Those relevant factors are (1.) the quality of advocacy; (2.) the character of the
5 work to be done; (3.) the work actually performed by the lawyer; and (4.) the results
6 obtained. In *Wright v. Osburn*, 114 Nev. 1367, 970 P.2d 1071 (1998), the Nevada
7 Supreme Court indicated that “disparity in income is also a factor to be considered
8 in awarding attorney fees.” Additionally, it would be appropriate for the Court to
9 consider *EDCR* § 5.102 (l) which provides that sanctions include an award of
10 attorney fees and costs to the Opposing Party; and *EDCR* § 7.60 which provides in
11 relevant part,
12

13 (a) If without just excuse or because of failure to give
14 reasonable attention to the matter, no appearance is made
15 on behalf of a party on the call of a calendar, at the time
16 set for the hearing of any matter, at a pre-trial conference,
17 or on the date of trial, the court may order any one or
18 more of the following:
19

20 (4) Any other action it deems appropriate,
21 including, without limitation, imposition of fines.

22 (b) The court may, after notice and an opportunity to be
23 heard, impose upon an attorney or a party any and all
24 sanctions which may, under the facts of the case, be
25 reasonable, including the imposition of fines, costs or
26 attorney’s fees when an attorney or a party without just
27 cause:
28

(2) Fails to prepare for a presentation.

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- (3) So multiplies the proceedings in a case as to increase costs unreasonably and vexatiously.
- (5) Fails or refuses to comply with any order of a judge of the court.

DATED this 25th day of June, 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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I.
MEMORANDUM OF FEES AND COSTS

I, Amanda M. Roberts, Esq., swear, under the laws of the State of Nevada as follows:

1. I am an attorney duly licensed before all Courts in the State of Nevada, employed by Roberts Stoffel Family Law Group and make statements contained in this Affidavit, of my own firsthand knowledge unless stated upon information and belief, as to those statements, I believe them to be true.

2. I am over the age of eighteen (18) years old and I am competent to testify as to the matters contained within the Affidavit.

3. I am the attorney for the Plaintiff, Bradley Bellisario. Throughout the remainder of this document, I am referenced as “Ms. Roberts” or “Counsel”.

4. The Parties to this action are the Plaintiff, Emily Bellisario (“Emily”), and the Defendant, Bradley Bellisario (“Bradley”), who were married on August 16, 2014. The Parties have three (3) minor children, to wit: Brayden Bellisario (“Brayden”), born January 15, 2015; Blake Bellisario (“Blake”), born November 20, 2016; and Brooklyn Bellisario (“Brooklyn”), born February 1, 2018.

5. I was retained by Emily on or about April 6, 2021, to represent her in her divorce with children.

1 6. Pursuant to the Retainer Agreement (attached as **Exhibit “1”**)
2 executed at the time she retained Ms. Roberts, Emily was, and continues to be,
3 billed at the following hourly rates:
4

5 a. Attorneys billed at \$350.00 per hour; and

6 b. Law clerks, paralegals and legal assistants billed at a rate of
7 \$150.00 per hour.
8

9 7. On May 1, 2021 Defendant, Bradley Bellisario filed a Motion for
10 Order to Show Cause why Plaintiff and Plaintiff’s Counsel, Amanda Roberts, Esq.,
11 Should not be Held in Contempt. Plaintiff’s Counsel filed an Opposition and
12 Countermotion to the above referenced Motion on May 14, 2021.
13

14 8. A hearing was held on the Motion and Opposition/ Countermotion on
15 June 16, 2021, wherein Defendant’s Motion for an Order to Show Cause was
16 denied.
17

18 9. Emily was forced to defend herself against Bradley’s instant Motion,
19 which did not need to be filed. Bradley’s instant Motion is without merit and failed
20 to follow the Court’s rules (*EDCR* § 5.510 (a)).
21

22 10. The legal fees requested and outlined herein are solely related to
23 Emily’s Opposition to Bradley’s Motion.
24

25 11. The breakdown of factors under *Brunzell* are as follows:

26 a. I have been practicing law since 2005.

27 b. I have focused my practice primarily around family law.
28

- 1 c. I am in good standing with the State Bar of Nevada.
2 d. I previously participated in a weekly radio show geared at the
3 Clark County community, focused on issues relative to family
4 law.
5 e. Yearly, I attend continuing legal education classes to stay
6 abreast of changes in the area of family law.
7 f. I have drafted Motions, argued before the District Court Judges
8 and Hearing Masters on issues related to domestic violence/
9 custody/divorce/ adoption/termination of parental rights,
10 brought and defended individuals at Evidentiary Hearings and
11 Evidentiary Hearings. Additionally, Counsel has taken cases on
12 Appeal to the Supreme Court of Nevada.
13 g. I have extensive experience at Trials or Evidentiary Hearings.
14 h. I have sat *pro tem* for the Hearing Master related to Protection
15 Orders.
16 i. I have been appointed by the Court in the capacity as a Guardian
17 Ad Litem, CAP Attorney, Guardianship Investigator, and
18 Parenting Coordinator.

19 12. Counsel's hourly rate of \$350.00 per hour is reasonable given the
20 number of years she has practiced law and the experience she has in family law.
21 Counsel's rate is substantially reduced compared to other attorneys with the same
22 experience and length of practice. In fact, Counsel has substantially increased her
23 rates over the last few years and continued James' as set forth in this original
24 Retainer Agreement.

25 13. In this matter, the billing related to the issues presented in Emily's
26 Opposition/COUNTERMOTION, to date, Emily has been billed \$1,490.00. This is
27 supported by **Exhibit "2"** which is the billing invoice maintained by Counsel,
28 evidencing the fees and costs.

1 14. A breakdown of the billing for each employee related to the contempt
2 matter is attached hereto as **Exhibit "3"** and the breakdown of hard costs related to
3 same is attached hereto as **Exhibit "4"** and both are fully incorporated herein by
4 reference.
5

6 15. On the billing statements, Amanda M. Roberts, Esq. is denoted by the
7 initials "AMR."
8

9 16. On the billing statements, Amanda M. Roberts, Esq. is denoted by the
10 initials "AMR."
11

12 17. Paralegal, Holli Mill, is denoted by "HM." Ms. Miller has worked for
13 Roberts Stoffel Family Law Group for approximately ten (10) years, and she has
14 worked in the legal field in excess of twenty (20) years.
15

16 18. Paralegal, Colleen O'Brien, is denoted by "CO". Ms. O'Brien has
17 worked in the legal field for approximately fourteen (14) years.
18

19 19. The billing that occurred in this matter is as follows:
20

21 a. AMR- 3.4 hours totaling \$1,190.00
22

23 b. HM- 1.2 hours totaling \$180.00
24

25 c. CO- 0.1 hours totaling \$120.00
26

27 20. As such, the total attorney fees billed in the contempt matter total
28 \$1,490.00

1 21. Hard costs for the contempt were \$12.00, broken down as follows in
2 this matter:

3 a. Wiznet- \$12.00
4

5 22. Attorney notes that she bills \$6.00 rather than \$3.50 for Wiznet
6 charges based upon the credit card charges incurred plus the cost for copying
7 including paper. This is done based upon the cost of paper for filings and to avoid
8 the necessity of keeping track of each and every copy made on an individual case.
9 The only time copying charges are referenced on a billing invoice is based upon a
10 volume of copies.
11

12 23. On or about July 30, 2020, the Court determined that Bradley's gross
13 monthly income was \$18,000.00 per month.
14

15 24. On or around December 23, 2020, Plaintiff filed a Financial Disclosure
16 Form with her monthly income at \$1,660.97.
17

18 25. Based upon the requests made herein, Emily asks the Court to award
19 her attorney fees and costs in the amount of \$1,502.00. Emily also requests this
20 sum to be reduced to judgment, shall accrue interest, and be collectible by any and
21 all legal means necessary until paid in full.
22

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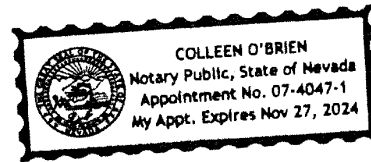
28

FURTHER AFFIANT SAYETH NAUGHT.

Amanda M. Roberts
Amanda M. Roberts

SUBSCRIBED and SWORN to before
me on this 25 day of June, 2021.


NOTARY PUBLIC



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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group,
and on the 25 day of June, 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 Memorandum of
Fees and Costs, to the following:

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

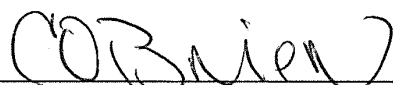
By: 
Employee of Roberts Stoffel Family Law Group

EXHIBIT “1”

EXHIBIT “1”

EXHIBIT “1”

ROBERTS STOFFEL FAMILY LAW GROUP

4411 S. Pecos Road
Las Vegas, Nevada 89121
Telephone: (702) 474-7007
Facsimile: (702) 474-7477
www.lvfamilylaw.com

ATTORNEY RETAINER AGREEMENT

Please read this Agreement, initial each page and sign the last page. Your signature on the document acknowledges that you have read this Agreement, understand the contents and agree to the terms and conditions contained herein. This Agreement will not take effect, and Roberts Stoffel Family Law Group will have no obligation to provide legal services, until the Client returns a signed copy of the Agreement and pays the retainer as described in the seven (7) pages of this contract ("Agreement").

This Agreement is entered between ROBERTS STOFFEL FAMILY LAW GROUP, ("Attorney") and Emily Bellisario ("Client"). As such this Agreement shall encompass the entire Attorney-Client Agreement as follows:

SCOPE AND DUTIES

Client is hiring attorney for the purpose of a divorce with children.

Attorney shall provide those legal services reasonable required to represent Client and shall take reasonable steps to keep Client informed of progress and to respond to Client's inquiries.

RETAINER

Client agrees to pay the sum of \$7,500.00 to Attorney as a retainer fee at the time Attorney is hired, which money is to be held in trust. Attorney retains the right to request a retainer at a later date. Client hereby authorizes Attorney to withdraw sums from the trust account to pay the costs, expenses and fees for legal services incurred in Client's case. At the end of each month, client shall receive a monthly billing statement which details the fees and itemizes the costs incurred. The retainer fee deposit is fully refundable. Any monies not used for costs, expenses, and fees for legal services will be refunded to the client at the conclusion of the case.

In addition to the initial retainer fee deposit, Attorney may at any time, require an additional deposit of retainer funds to secure payment in the matter.

Initials: EB

No portion of any "flat fee" specified in this Agreement for specific items will be refunded, even if the accrued costs and fees are less than the non-refunded fee.

Any client who requests a refund by means of crediting to their original credit card will be charged a \$15.00 charge and Client will be charged a \$25.00 fee for each returned check.

LEGAL FEES

Client agrees to pay for legal services at the following rates:

- \$375.00- Managing Attorneys
- \$375.00- Associate Attorneys
- \$150.00- Paralegal/Legal Assistant

All billing for time will be done in 1/10 of an hour (i.e., six minute) increments, and will round to the nearest such increment.

BILLING INCREMENTS	TIME
0.1	0-6 minutes
0.2	7-12 minutes
0.3	13-18 minutes
0.4	19-24 minutes
0.5	25-30 minutes
0.6	31-36 minutes
0.7	37-42 minutes
0.8	43-48 minutes
0.9	49-54 minutes
1.0	55-60 minutes

Client understand that Attorney fees will include all work completed or time required to attend to the matter including but not limited to preparation of documents, telephone contact with client and other persons involved in the action, travel time, deposition time, time required to review documents, trial preparation and other time utilized to tend to the matter.

Client authorizes Attorney to use associate counsel, legal assistants, or paralegals for such work on this case as Attorney might deem appropriate. Such persons shall be billed at their regular billing rate. Client acknowledges and agrees that such staff personnel may be utilized whenever deemed appropriate and directs Attorney to apportion work at Attorney's discretion so as to minimize costs and maximize effectiveness.

Under some circumstances, more than one member of the Attorney's staff may work on a matter for client simultaneously, in which case both members of Attorney's

Initials: UB

staff will bill for the time spent at the discretion of Attorney. An example would include attending trial or contested evidentiary hearing, during which time the participation of more than one person may be necessary to properly attend to Client's case.

The hourly rates quoted above are subject to increase from time to time. Attorney will give notice in writing at least thirty (30) days prior to any increase in hourly fees. Client understands that if Attorney continues to represent Client past the date of the increase, the new fees will be in effect and Client agrees to pay these increased fees for all services rendered thereafter.

The above mentions retainer does not release Client from fees and costs incurred on a monthly basis. Any fees and costs exceeding the initial retainer shall be billed to Client monthly. The monthly billing statement shall provide the client with a detailed description of the fees incurred and the costs accrued. Upon receipt of the bill, Client shall pay Attorney in full within 14 days. Should Client not pay the balance of the account in full within 14 days, interest at the rate of 18% annually (1 ½ percent per month) will be charged on any unpaid balance. The interest provision is not an Agreement to extend credit but is a method of compensating Attorney for delayed payment.

Any dispute as to the accuracy or validity of any billed charges, or requests for adjustment of any costs, expenses, or fees for legal services billed to Client **must be made in writing to Attorney within thirty (30) days of the date of the statement containing that cost, expense, or fee for legal services.** If Client does not do so within thirty (30) days of a billing statement, the statement will be conclusively presumed to be correct.

In other words, **if Client does not contact Attorney in writing within thirty (30) days of a billing statement, Client will have irrevocably agreed that the statement is accurate and correct.** Any person ever reviewing any dispute regarding charges on a billing statement is asked to honor this provision, since it is an essential term to Attorney's Agreement to represent Client in this case.

Should client fail to maintain Client's bill, Attorney is permitted to withdraw. Furthermore, Attorney may request for the Court to reduce the outstanding fees and costs to judgment at which time, Attorney may execute on the judgment by any and all legal means. Should Attorney be forced to withdraw for the matter and request the Court reduce outstanding fees and costs to judgment, Attorney may request and be permitted to receive the fee and costs incurred by the withdraw and judgment including but not limited to preparation for motion and other necessary documents, appearance time, costs associated with filing and executing on the judgment.

If Attorney files a lien to recover unpaid fees and/or costs incurred on Client's behalf, or if Client seeks to formally dispute Attorney's billings, by initiating mediation, arbitration, litigation, or fee dispute in any forum, all "write off" or "no charge" costs, expenses, and fees for legal services reflected on any statement to Client will revert to

Initials: ER

being fully billed, and be additional sums owed to Attorney by Client, in **addition** to the sum disputed by the Client.

In accordance with the Uniform Commercial Code, no payment s made to Attorney for less than the full sum owed shall constitute payment in full, even if that notation is placed on the payment instructions, unless Attorney and Client both sign a written Agreement specifically permitting such payment to constitute a payment-in-full.

Client agrees to pay any fees and costs that are incurred by Attorney to collect fees, costs, or expense from Client, including reasonable attorney's fees.

Client agrees to pay any fees and costs that are incurred by Attorney to collect fees, costs, or expense from Client, including reasonable attorney's fees. In addition, client hereby agrees to pay a flat-fee cost of \$1,000.00 if attorney must file a motion to adjudicate a retaining lien and consents to the District Court's summary adjudication of attorney's retaining lien pursuant to Argentena Consolidated Mining Company v. Jolley Urga, et al, 216 P.3d 779.

Initials: JD

ADDITIONAL FEES AND COSTS:

Client shall be responsible for all costs and fees not included above which may be incurred in Client's case, including but not limited to: filing fees, fees for service of process, delivery charges, investigation costs, mediation, blood testing, pictures, depositions, and other transcription charges, translations, witness fees, jury fees, doctor, accountant, engineer or witness fees deemed necessary by the Attorney and miscellaneous extraordinary costs such as copying, fax, postage and other mailing expenses, and long distance telephone calls. Filing fees for Court are to be paid directly to Attorney and must be paid prior to the filing of any papers.

LIEN

Client hereby grants Attorney a lien on any and all Clients or causes of action that are related to the subject of Attorney's representation under this Agreement. Attorney's lien will be for any such sum due and owing to Attorney at the conclusion of Attorney's services. The lien will attach to any recovery Client may obtain, whether by arbitration award, judgment, settlement, or otherwise. Any amounts received by Attorney's office on Client's behalf may be used to pay Client's account.

Attorney will retain possession of Client's file and all information therein until full payment of all costs, expenses, and fees for legal services, subject to turnover or destruction of the file as set out herein above.

\\

Initials: JR

CONTACT AND COMMUNICATIONS

Attorney shall take all steps reasonable to assure Client is informed at all times as to the status of their matter and as to the future steps necessary in their matter. Attorney shall provide Client with a copy of all documents, correspondence and filings, to which they are permitted by the Court. Attorney encourages Client to maintain all copies provided to them by Attorney. Attorney is permitted to utilize all means of communication including but not limited to email, telephone, cellular telephone, facsimile, and mailing unless otherwise advised by Client.

Client agrees to make themselves available to Attorney when requested and to immediately advise Attorney of a change of telephone number, address, employment and/or contact information.

COURT ORDERED FEES:

Attorney reserves the right to seek an order from the Court (under circumstances deemed appropriate by the Court) for an award of attorney fees to be paid by the Adverse Party based upon the reasonable value of Attorney's services (as determined by the Court). If the Court makes an award of fees in excess of the amount charges to Client, and the allowed fees are in fact paid, Attorney agrees to refund Client the amount charges for services which were the subject of the Court order. Attorney will be entitled to keep the balance. Client will still be obligated to pay Attorney the total attorney's fees accrued if the Court denied the application, and Client will be also required to pay for services rendered which were not included in the application to the Court. Any Attorney's fees directed to be paid by Client to Adverse Party shall be paid directly to Adverse Party's attorney by Client. If adverse party is obligated to pay attorney fees, said attorney fees are to be paid directly to Attorney.

WITHDRAW OF ATTORNEY

Client may discharge Attorney at any time, although Client understands that Court rules might still require Attorney to file a motion to withdraw. Attorney may withdraw at any time at Attorney's discretion. In such circumstance, Client agrees to sign the documents necessary to permit Attorney to withdraw.

Client understands that Attorney may exercise Attorney's right to withdraw based upon client misrepresenting or fails to disclose material facts to Attorney, fails to cooperate and participate as directed by Attorney or the court or any division of the court, for failure to pay fees when due, for failure to keep Attorney advised for additional services, or if Client fails to maintain contact with Attorney and keep Attorney advised of Client's current home and work addresses and telephone numbers. Furthermore, Attorney reserves the right to withdraw from this matter if Client fails to honor this Agreement or for any reason as permitted or required under Nevada Code of Professional Conduct or as permitted by the Eighth Judicial District Court or Federal Court. Client

Initials: _____

further agrees to be punctual in keeping appointments and to inform attorney immediately when appointment must be cancelled.

After payment of all sums due and upon Client's request, Attorney will deliver Client's file (other than Attorney's personal notes, briefs and work product that Attorney elects to retain) to Client, along with any Client funds or property in Attorney's possession. If Attorney is not instructed otherwise, Client's file will be kept in Attorney office for a limited time after completion of the case, and then sent to off-site storage, where it will be held for a period not exceeding seven years.

Either Party may terminate this Agreement by giving written notice to the other. Client may terminate Attorney's services at any time, for any reason. Client must give Attorney sufficient notice that Attorney may prepare appropriate documents. Client will be required to pay all Attorney's fees owing at time of termination of Attorney's services as well as for time expenses to substitute counsel, or to prepare a Motion to Withdraw and for Attorney's Lien and appear in Court to obtain permission to withdraw as counsel for Client. In the event fees or costs are owing to ROBERTS STOFFEL FAMILY LAW GROUP at any time during or after representation, Client agrees that Attorney shall have a lien on any and all claims causes of action on which Attorney was working; on all funds or property which has been or is later received; and on all files and work papers produced by Attorney.

DISCLAIMER OF GUARANTEE; TOTAL FEES AND COSTS; TAX CONSEQUENCES.

Nothing in this Agreement and nothing in Attorney's statements to Client will be construed as a promise or guarantee about the outcome of Client's matter. Attorney makes no such promise or guarantees. Attorney's comments about the outcome of Client's matter, if any, are expressions of opinion only.

It is understood that it is impossible to predict how long a case will take, how much it will cost or what the resulting outcome may be. Attorney does not make and has not made any guarantees to Client about the length or expense of Client's case. Attorney has not and will not make and/or guarantee as to the outcome of Client's case. Client has been informed and acknowledges that it is quite likely that the costs, expenses, and fees for legal services incurred in Client's case will exceed the initial retainer fee deposit.

No advice is given regarding tax consequences, and Attorney specifically is not provided tax advice, although questions relating to tax matters may very well come up during the course of the case. Client agrees to seek tax advice elsewhere, and to hold Attorney harmless for any tax effect.

\\

\\

Initials: WB

SEVERABILITY

The provision of this Agreement is severable. This means that if one or more provisions of this Agreement are found to be void or unenforceable for any reason, the remaining provisions of this Agreement will still apply.

FEE DISPUTE

If a dispute arises, the fee Agreement shall be interpreted under Nevada law enforced only in Nevada Courts, and the prevailing Party shall be entitled to reasonable attorney's fees and costs. This Agreement is binding on your successors and shall not be modified except in writing signed by both the Attorney and Client.

This Agreement is entered into in accordance with the law of the State of Nevada, and Nevada law will apply to any questions relating to the meaning of any provisions of this Agreement.

Client hereby agrees that he/she has been afforded the opportunity to consult independent counsel to review said Retainer Agreement and to have any and all questions or concerns answered and has either done so or has waived his/her right of same.

Initials: EB

CLIENT INFORMATION:

Full Name:	Emily Bellisario
Street Address:	1913 Sondio Drive
City/State/Zip Code:	Las Vegas, Nevada 89134
Date of Birth:	11/01/1985
SSN:	
Email Address:	<u>1emilybellisario@gmail.com</u>

CLIENT

EB
Emily Bellisario

Date

Initials: EB

**ROBERTS STOFFEL FAMILY
LAW GROUP**

Amanda M. Roberts
Amanda M. Roberts, Esq.

Date

EXHIBIT “2”

EXHIBIT “2”

EXHIBIT “2”

Roberts Stoffel Family Law Group

4411 S. Pecos Road
Las Vegas, Nevada 89121
Phone No.: (702) 474-7007
Fax: (702) 474-7477
Federal Tax ID: 80-0508360
Statement as of: 06/25/2021
Statement No: 0

Emily Bellisario
1913 Sondio Drive
Las Vegas, Nevada 89134

3272-001: BELLISARIO, EMILY; Divorce with kids
Bellisario, Emily

Professional Fees			Hours	Rate	Amount
05/03/2021	HM	Receive and review communication from Opposing Party; discuss with Colleen O'Brien. Draft Objection. Draft Motion for protective Order. Review and revise letter to Opposing Party regarding discovery.	1.80	150.00	270.00
05/04/2021	HM	Receive Opposing Party's Ex Parte Application; review and send to client. Receive Motion for Contempt against Amanda Roberts, Esq. Discuss case with Amanda Roberts, Esq. and next steps. Email back and forth with client. Review client's medical records for herself and children. Draft letter to Opposing Party regarding medical bills. Bates stamp records. Send email to Dr. Holland to commence evaluation. Further discussion with Amanda Roberts, Esq	1.50	150.00	225.00
05/05/2021	HM	Receive emails from client and respond; save information to client file.	0.20	150.00	30.00
05/07/2021	HM	Review Opposing Party's Motion to discontinue SCRAM monitoring. Draft Opposition to Opposing Party Motion regarding SCRAM. Discuss with Colleen and Amanda Roberts, Esq	1.20	150.00	180.00
05/10/2021	AMR	Emails with [REDACTED]	0.20	350.00	70.00
05/10/2021	AMR	Review Reply for civil matter (no charge).	0.70	350.00	245.00
05/10/2021	AMR	Review and revise Notice. Draft Supplement. Review Court files for deadlines.	1.60	350.00	560.00
05/10/2021	CO	No charge-Review Court website to input Opposing Party Motion's and our Oppositions for our records.	0.30	0.00	No Charge
05/10/2021	CO	Draft Notice of Filing Opposition	0.30	150.00	45.00
05/10/2021	CO	E-file and serve Notice of Filing Opposition and Supplemental	0.20	150.00	30.00

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05/10/2021	HM	Review Donna's House Report. Receive email from client. Pull Opposition from civil action and review. Discuss with Amanda Roberts, Esq. and Colleen.	0.50	150.00	75.00
05/10/2021	HM	Review status of all criminal matters; discuss with Amanda Roberts, Esq. Review and revise Notice drafted by Amanda Roberts, Esq.	0.20	150.00	30.00
05/11/2021	CO	Process Subpoena and 4th Request for Production of Documents to be served to Opposing Party.	0.20	150.00	30.00
05/11/2021	CO	Process Order After Hearing from 5/11/21.	0.10	150.00	15.00
05/11/2021	HM	[REDACTED]	0.80	150.00	120.00
05/12/2021	CO	Review letter to Opposing Party, serve the same	0.20	150.00	30.00
05/12/2021	CO	No charge- correct letter to Opposing Party, re-serve the same.	0.20	0.00	No Charge
05/12/2021	CO	Email to Family First to send them the Order from Court, email to client to give her information for Family First	0.20	150.00	30.00
05/12/2021	CO	Review hearing video for section regarding the Subpoenas, transcribe the same for our Opposition	0.40	150.00	60.00
05/12/2021	CO	Begin drafting 11th Supplemental Disclosure of Documents	0.40	150.00	60.00
05/12/2021	HM	Work on facts of Opposition and Countermotion. Review Opposing Party's correspondence. Work with Amanda Roberts, Esq	1.00	150.00	150.00
05/12/2021	SH	Draft Notice of Entry of Order for Amanda M. Roberts to review	0.20	150.00	30.00
05/12/2021	SH	Process,, efile, and serve Notice of Entry of Order	0.20	150.00	30.00
05/12/2021	SH	Review and revise Notice	0.10	150.00	15.00
05/12/2021	SH	Review and revise Statement of Facts	0.20	150.00	30.00
05/12/2021	SH	Process, efile, and serve Notice	0.20	150.00	30.00
05/13/2021	AMR	Review and revise Opposition to Motion for Order to Show Cause. Review and revise statement of facts on Opposition to SCRAM Motion.	2.10	350.00	735.00
05/13/2021	CO	Finish drafting 11th Supplemental disclosure of documents	0.50	150.00	75.00
05/13/2021	CO	Assist in completing Exhibits for our Opposition to the Motion for SCRAM and Motion for an Order to Show Cause.	0.40	150.00	60.00
05/13/2021	CO	E-file and service Notice of Therapist.	0.20	150.00	30.00
05/13/2021	HM	Work with Amanda Roberts, Esq. on Opposition to Order to Show Cause. Work with Amanda Roberts, Esq. on Opposition to Motion Remove SCRAM. Draft Exhibit pleading in support of Oppositions (both).	2.90	150.00	435.00

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05/13/2021	JS	Index Motions and Add to binder	0.40	150.00	60.00	
05/13/2021	JS	Update correspondence file with new documents	0.30	150.00	45.00	
05/13/2021	JS	Index Discovery and to client binder	0.20	150.00	30.00	
05/14/2021	AMR	Review Motion for Order to Show Cause. Discussions with Counsel regarding Order to Show Cause. Review and revise Opposition to Motion for Order to Show Cause.	2.30	350.00	805.00	*
05/14/2021	CO	Draft 12th Supplemental Disclosure of Documents.	0.30	150.00	45.00	
05/14/2021	CO	Process Opposition and Exhibits to Defendant's Motion for an Order to Show Cause to be e-filed and served, and 12th Supplemental Disclosures.	0.30	150.00	45.00	*
05/14/2021	CO	Draft Exhibits in Support Opposition.	0.70	150.00	105.00	
05/14/2021	HM	Review response to Subpoena from Nevada State Bank; save to file. (no charge)	0.10	150.00	15.00	
05/17/2021	AMR	Review and revise Opposition regarding SCRAM and Countermotion regarding drug testing.	1.60	350.00	560.00	
05/17/2021	CO	Finish drafting Exhibits to Opposition to SCRAM, including creating a Dropbox for 2 video exhibits	0.60	150.00	90.00	
05/17/2021	CO	Process Opposition and Exhibits to SCRAM to be e-filed and served.	0.20	150.00	30.00	
05/18/2021	AMR	Prepare and attend hearing, and draft Order After Hearing.	1.90	350.00	665.00	
05/18/2021	CO	No charge- attend hearing with Amanda M. Roberts.	0.40	0.00	No Charge	
05/18/2021	HM	Review two motions filed by Opposing Party. Discuss with Colleen and Amanda Roberts, Esq. Create updated Schedule of Arrears through January 31, 2021. Update chart to include entire time period. Send chart to client for her to input additional information and provide proof of records. Telephone call to client. Update cover sheets for Schedules - both child support and temporary support. Further discussion with Amanda Roberts, Esq. Pull civil case records; save and review.	2.00	150.00	300.00	
05/19/2021	AMR	Review Subpoenas from Opposing Party and email client regarding same.	0.40	350.00	140.00	
05/19/2021	HM	Receive and review Opposing Party's Notice regarding therapist.	0.20	150.00	30.00	
05/24/2021	CO	Phone call with client regarding outstanding Discovery and other case issues.	0.20	150.00	30.00	
05/24/2021	CO	Review letter to Opposing Party regarding the car and house, serve the same.	0.20	150.00	30.00	
05/24/2021	CO	Begin response to Production of Documents	0.30	150.00		PLTF0850

05/24/2021	HM	Receive and review letters from Opposing Party; review file and additional correspondence.	0.30	150.00	45.00
05/25/2021	AMR	Review and revise response to Request for Production of Documents. Emails with client regarding same.	1.70	350.00	595.00
05/25/2021	AMR	Review and revise final draft of response to Request for Production of Documents and 13th Supplement Disclosure Pursuant to NRCP 16.2.	1.00	350.00	350.00
05/25/2021	CO	Finish drafting Response to Production of Documents and draft 13th Supplemental Disclosures	1.50	150.00	225.00
05/25/2021	CO	Process Response to Production of Documents and 13th Supplemental Disclosures to be served to Opposing Party.	0.40	150.00	60.00
05/25/2021	HM	Review and input response to discovery requests; review file and filed records for information. Work with Ananda Roberts, Esq. Review and revise email to client regarding records needed. Work with Colleen for supplement. Add to Bates Stamp file.	3.70	150.00	555.00
05/26/2021	CO	Process 5th Request for Production of Documents	0.20	150.00	30.00
06/09/2021	CO	Draft Notice of Entry of Order for case A-20-812996-C.	0.20	150.00	30.00
06/09/2021	CO	Draft correspondence to Opposing Party regarding deposition	0.10	150.00	15.00
06/09/2021	CO	Process letter to Opposing Party regarding deposition dates.	0.10	150.00	15.00
06/09/2021	LH	Review and sign Notice of Entry of Order from A matter.	0.20	300.00	60.00
06/09/2021	RE	NEOJ	0.20	75.00	15.00
06/10/2021	CO	E-file and serve Notice of Discovery Dispute Conference	0.20	150.00	30.00
06/14/2021	AMR	Prepare and attend Discovery Dispute Conference (no show). Letter to Opposing Party regarding Discovery Dispute Conference.	0.50	350.00	175.00
06/14/2021	AMR	Letter regarding deposition. Set up Motion regarding deposition.	0.70	350.00	245.00
06/14/2021	AMR	Telephone call with [REDACTED]	0.60	350.00	210.00
06/14/2021	SH	Review and revise letter to Opposing Party Process, and eserve letter	0.20	150.00	30.00
06/14/2021	SH	Review and revise statement of facts	0.20	150.00	30.00
06/15/2021	AMR	Letter regarding therapy.	0.30	350.00	105.00
06/15/2021	CO	Review letter drafted to Opposing Party, serve the same.	0.20	150.00	30.00
06/16/2021	AMR	Prepare and attend hearing on Order to Show Cause. Draft Order After Hearing from June 16, 2021, and letter	1.70	350.00	595.00

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		to Opposing Party regarding same. Review and revise Order After Hearing from May 18, 2021, and letter to Opposing Party regarding same. Review and revise Report and Recommendation on attorney fees. Prepare and attend hearing on Discovery issues. Draft Report and Recommendation.			
06/16/2021	CO	Draft Report and Recommendation from the April 22, 2021 Minute Order.	0.60	150.00	90.00
06/16/2021	CO	Review Order After Hearing from the May 18, 2021 and letter to Opposing Party regarding the same.	0.20	150.00	30.00
06/16/2021	CO	Process correspondence (x2) and Order After Hearing from the 5/18/2021 Order After Hearing and 6/16/2021 Order After Hearing.	0.40	150.00	60.00
06/16/2021	CO	Process Discovery Commissioner's Report and Recommendation to be submit to Discovery.	0.20	150.00	30.00
06/16/2021	CO	Edit DCRR per the Court's request, re- submit the same.	0.30	150.00	45.00
06/21/2021	AMR	Letter to Opposing Party regarding deposition attendance. Review and revise Response to Request for Production of Documents.	0.40	350.00	140.00
06/21/2021	CO	Draft Response to Second Set of Request for Production of Documents.	1.00	150.00	150.00
06/21/2021	CO	Review and process correspondence to Opposing Party, process Response to Defendant's 2nd set of Production of Documents .	0.40	150.00	60.00
06/21/2021	CO	Phone call with Emily regarding our response to Defendant's 2nd Request for Production of Documents	0.20	150.00	30.00
06/23/2021	CO	Draft 14th Supplemental Disclosure of Documents including saving documents from the Supreme Court website, and Bates Stamping new disclosures.	0.40	150.00	60.00
06/23/2021	CO	Process 14th Disclosures to be served	0.20	150.00	30.00
06/23/2021	CO	Draft 6/16/2021 Report and Recommendation.	0.60	150.00	90.00
06/25/2021	AMR	Review and revise Discovery Commissioners Report and Recommendation.	0.40	350.00	140.00
06/25/2021	AMR	Review and revise Memorandum of Fees and Costs.	0.60	350.00	210.00 *
06/25/2021	AMR	Review and revise letter to Court regarding Order After Hearing (x2).	0.20	350.00	70.00
06/25/2021	CO	Draft correspondence to Court to submit the 6/16/2021 Order After Hearing to Court absent Opposing Party signature	0.20	150.00	30.00
06/25/2021	CO	Process letter and Order After Hearing to Court.	0.20	150.00	30.00

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06/25/2021	CO	Draft letter to Court regarding Order After Hearing from the 5/18 hearing.	0.20	150.00	30.00
06/25/2021	CO	Process Order After Hearing from 5/18/2021 and correspondence to be sent to Court.	0.20	150.00	30.00
06/25/2021	CO	Begin drafting Memorandum of Fees and Costs pursuant to the 6/16/2021 hearing.	0.50	150.00	75.00 ✕
06/25/2021	CO	Draft Order Releasing Lis Pendens.	0.30	150.00	45.00
Sub-total Fees:					\$11,715.00
Discount::					(260.00)

Rate Summary

Jennifer Mosher (Souza)	0.90 hours at \$150.00/hr	135.00
Shayna Hall	1.30 hours at \$150.00/hr	195.00
Lynn Hughes	0.20 hours at \$300.00/hr	60.00
Holli Miller	16.40 hours at \$150.00/hr	2,460.00
Colleen O'Brien	0.90 hours at \$0.00/hr	0.00
Colleen O'Brien	14.90 hours at \$150.00/hr	2,235.00
Receptionist	0.20 hours at \$75.00/hr	15.00
Amanda M. Roberts	18.90 hours at \$350.00/hr	6,615.00
Total hours:	53.70	

Expenses	Units	Price	Amount
06/09/2021 Postage NEOJ to OP	1.00	0.71	0.71
05/10/2021 Filing Fee- Notice of Filing of Opposition and Supplemental	2.00	6.00	12.00
05/12/2021 Wiznet fee for Notice	1.00	6.00	6.00
05/12/2021 Wiznet fee for Notice of Entry of Order	1.00	6.00	6.00
05/13/2021 Wiznet	1.00	6.00	6.00
05/14/2021 Wiznet- Opposition and Exhibits.	2.00	6.00	12.00 ✕
05/17/2021 Wiznet- Opposition and Exhibits to SCRAM.	2.00	6.00	12.00
06/09/2021 Efile and Served NEOJ	1.00	6.00	6.00
06/10/2021 Wiznet- Notice of Discovery Dispute Conference.	1.00	6.00	6.00
Sub-total Expenses:			\$66.71

Trust Account

05/07/2021	Payment on Account (CC)	\$0.00
05/13/2021	Payment on Account (CC)	2,000.00
06/14/2021	Payment on Account (CC)	7,500.00
		PLTF0871

Ending Balance:	<u>\$11,500.00</u>
Total Current Billing:	\$11,521.71
Previous Balance Due:	\$25,579.73
Total Payments:	\$0.00
Total Now Due:	<u>\$37,101.44</u>

PLTF0872

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EXHIBIT “3”

EXHIBIT “3”

EXHIBIT “3”

Job Title	Attorney	Paralegal	Paralegal
Name	Amanda M. Roberts	Holli Miller	Colleen O'Brien
Initials on Billing Stmt.	AMR	HM	CO
	2.3	0.2	0.3
	1	1	0.5
	0.1		
TOTAL	3.4	1.2	0.8
Rate	\$350.00	\$150.00	\$150.00
Total Billing	\$1,190.00	\$180.00	\$120.00
Total Billing Without Discount	\$1,490.00		

PLTF0874

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EXHIBIT “4”

EXHIBIT “4”

EXHIBIT “4”

Description	Wiznet
Invoice Date	
5/14/2021	\$12.00
TOTAL	\$12.00
Total Billing Without Discount	\$12.00

PLTF0873

AA3197

1 **ORDR**

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.

)

16 **ORDER AFTER HEARING**

17 BRADLEY BELLISARIO,

)

)

18 Defendant.

) Date of Hearing: June 16, 2021

) Time of Hearing: 10:00 a.m.

)

19 THIS MATTER having come before the Court on the 16th day of June,

20 2021, on Defendant's Motion for an Order to Show Cause and the Plaintiff's

21 Opposition and Countermotion for an award of attorney fees and costs. The

22 Plaintiff, Emily Bellisario, being present and represented, by and through her

23 attorney of record, Amanda M. Roberts, Esq., of Roberts Stoffel Family Law

24 Group, and the Defendant, Bradley Bellisario, being present in proper person.

25 ///

1 THE COURT HEREBY FINDS there is no finding of contempt.

2 NOW THEREFORE,

3 THE COURT HEREBY ORDERS that the Defendant's request for the
4 issuance of an Order to Show Cause is denied.
5

6 THE COURT FURTHER ORDERS that the receiver and accountant shall
7 get copies of all records received regarding the Defendant's IOLTA trust account,
8 the Court wants the Plaintiff's Counsel to limit her review of those records in this
9 matter and the record shall not be released to the Plaintiff.
10

11 THE COURT FURTHER ORDERS that any outstanding Orders shall be
12 prepared and submitted forthwith.
13

14 THE COURT FURTHER ORDERS that the Plaintiff's request for an award
15 of attorney fees and costs is granted. The Plaintiff shall file a Memorandum of Fees
16 from the date of Notice of Entry
17 and Costs within ten (10) days (~~i.e., June 26, 2021~~) and the Defendant shall have
18 the statutory time to object. Thereafter, the Court shall issue an Order on the
19 amount of attorney fees being sought.
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21 THE COURT FURTHER ORDERS that Ms. Roberts shall prepare the
22 Order.
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The Parties are put on notice of the following provision of *NRS* §125C.006, which states:

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1 Both Parties shall be bound by the provisions of *NRS* §125C.0045(6) which
2 states:

3 *PENALTY FOR VIOLATION OF ORDER: THE*
4 *ABDUCTION, CONCEALMENT OR DETENTION OF A*
5 *CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE*
6 *AS A CATEGORY D FELONY AS PROVIDED IN NRS §*
7 *193.130. NRS § 200.359 provides that every person having a*
8 *limited right of custody to a child or any parent having no right*
9 *of custody to the child who willfully detains, conceals or*
10 *removes the child from a parent, guardian or other person*
11 *having lawful custody or a right of visitation of the child in*
12 *violation of an order of this court, or removes the child from the*
13 *jurisdiction of the court without the consent of either the court*
14 *or all persons who have the right to custody or visitation is*
15 *subject to being punished for a category D felony as provided in*
16 *NRS §193.130.*

17 Pursuant to *NRS* §125C.0045(7), the terms of the Hague Convention of
18 October 25, 1980, adopted by the 14th Session of the Hague Conference on Private
19 International Law, apply if a parent abducts or wrongfully retains a child in a
20 foreign country.

21 The minor children's habitual residence is located in the United States of
22 America. *NRS* § 125C.0045 (7) and (8) specifically provide as follows:

23 Section 7. In addition to the language required pursuant to subsection
24 6, all orders authorized by this section must specify that the terms of the
25 Hague Convention of October 25, 1980, adopted by the 14th Session of the
26 Hague Conference on Private International Law, apply if a parent abducts or
27 wrongfully retains a child in a foreign country.

28 Section 8. If a parent of the child lives in a foreign country or has
significant commitments in a foreign country:

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(a) The parties may agree, and the Court shall include in the Order for custody of the child, that the United States is the country of habitual residence of the child for the purposes of applying the terms of the Hague Convention as set forth in Subsection 7.

(b) Upon motion of the parties, the Court may order the parent to post a bond if the Court determines that the parent poses an imminent risk of wrongfully removing or concealing the child outside the country of habitual residence. The bond must be in an amount determined by the Court and may be used only to pay for the cost of locating the child and returning him to his habitual residence if the child is wrongfully removed from or concealed outside the country of habitual residence. The fact that a parent has significant commitments in a foreign country does not create a presumption that the parent poses an imminent risk of wrongfully removing or concealing the child.

The Parties are further put on notice that they are subject to the provisions of *NRS* §31A and *NRS* § 125.450 regarding the collection of delinquent child support payments.

The Parties are further put on notice that either Party may request a review of child support pursuant to *NRS* §125B.145.

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1 The Parties shall submit the information required in *NRS* §125B.055, *NRS*
2 §125.130 and *NRS* §125.230 on a separate form to the Court and the Welfare
3 Division of the Department of Human Resources within ten (10) days from the date
4 the Decree in this matter is filed. Such information shall be maintained by the
5 Clerk in a confidential manner and not part of the public record. The Parties shall
6 update the information filed with the Court and the Welfare Division of the
7 Department of Human Resources within ten (10) days should any of that
8 information become inaccurate.

11 IT IS SO ORDERED.

Dated this 26th day of June, 2021




Approved as to Content and Form:

538 D2E B9D8 5856
Mary Perry
District Court Judge

15 Submitted this 25th day of
16 June, 2021.

18 **ROBERTS STOFFEL FAMILY
LAW GROUP**

19 By: 

21 Amanda M. Roberts, Esq.
22 State of Nevada Bar No. 9294
23 4411 South Pecos Road
24 Las Vegas, Nevada 89121
25 PH: (702) 474-7007
26 FAX: (702) 474-7477
27 EMAIL: efile@lvfamilylaw.com

By: _____
Bradley Bellisario
7100 Grand Montecito Pkwy., #2054
Las Vegas, Nevada 89149
PH: (702) 936-4800
FAX: (702) 936-4801
EMAIL: bradb@bellisariolaw.com

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

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5
6 Emily Bellisario, Plaintiff

CASE NO: D-20-605263-D

7 vs.

DEPT. NO. Department P

8 Bradley John Bellisario,
9 Defendant.

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Order was served via the court's electronic eFile system to all
recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 6/26/2021

15 Amanda Roberts

efile@lvfamilylaw.com

16 Bradley Bellisario

bradb@bellisariolaw.com

17 Bradley Bellisario

bradb@bellisariolaw.com

18 Linda Bell

dept07lc@clarkcountycourts.us

1 **ORDR**

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.

)

16 **ORDER AFTER HEARING**

17 BRADLEY BELLISARIO,

)

)

18 Defendant.

) Date of Hearing: May 18, 2021

) Time of Hearing: 11:00 a.m.

)

19 THIS MATTER having come before the Court on the 18th day of May, 2021,

20 for multiple Motion, Opposition, and Reply hearings. The Plaintiff, Emily

21 Bellisario, being present and represented, by and through her attorney of record,

22 Amanda M. Roberts, Esq., of Roberts Stoffel Family Law Group, and the

23 Defendant, Bradley Bellisario, being present in proper person. The Parties and

24 Counsel having appeared via Blue Jeans application due to the Administrative

1 Orders. The Court having heard the arguments and reviewed the pleadings on file
2 herein hereby finds and Orders as follows:

3 NOW THEREFORE,
4

5 THE COURT HEREBY ORDERS that Defendant's request to reconsider the
6 Order After Hearing from January 25, 2021, is denied.

7 THE COURT FURTHER ORDERS that Defendant's request to reconsider
8 the Protection Order from April 6, 2021, is denied.

9 THE COURT FURTHER ORDERS that Defendant's request to renew his
10 Motion to Disqualify Judge Perry is denied.

11 THE COURT FURTHER ORDERS that Defendant's request to remove
12 SCRAM is granted.

13 THE COURT FURTHER ORDERS that Defendant shall produce an updated
14 SCRAM report through May 18, 2021, by Friday, May 21, 2021, at noon.

15 THE COURT FURTHER ORDERS that Defendant shall provide his work
16 search as previously Order and those shall be filed and served by Friday, May 21,
17 2021, at noon.

18 THE COURT FURTHER ORDERS that Plaintiff's request for Defendant to
19 be drug tested is denied.

20 THE COURT FURTHER ORDERS that Plaintiff's request for Defendant to
21 be deemed a vexatious litigant is denied., at the present time.

1 THE COURT FURTHER ORDERS that Plaintiff's request to lift the
2 Defendant's Lis Pendens on the real property at 1913 Sondrio Drive, Las Vegas,
3 Nevada 89134 ("real property") is granted.
4

5 THE COURT FURTHER ORDERS that Bradley shall not file another Lis
6 Pendens on the real property at 1913 Sondrio Drive, Las Vegas, Nevada 89134.
7

8 THE COURT FURTHER ORDERS that any issues regarding Bradley's
9 alleged interest in the real property is a Trial issue and is not eliminated by allowing
10 Emily to refinance the real property at 1913 Sondrio Drive, Las Vegas, Nevada
11 89134.
12

13 THE COURT FURTHER ORDERS that the Plaintiff shall be permitted to
14 refinance the real property at 1913 Sondrio Drive, Las Vegas, Nevada 89134 is
15 granted; however, Plaintiff shall not remove all of the equity in the real property.
16

17 THE COURT FURTHER ORDERS that the Defendant shall have until
18 Friday, May 21, 2021, at noon to file and serve upon the Plaintiff's Counsel the
19 name of three (3) qualified providers from the Outsource Provider List to conduct
20 the psychological evaluation of the Parties. If the Defendant fails to provide the
21 names by Friday, May 21, 2021, at noon, then the psychological evaluations shall
22 be completed by Dr. Holland; however, if the Defendant does provide the names by
23 Friday, May 21, 2021, at noon, then the Plaintiff shall have until Monday, May 24,
24 2021, at noon to select one of the names from the list.
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1 THE COURT FURTHER ORDERS that if a new psychological evaluation
2 provider is selected, Defendant shall reimburse anything already expended by Dr.
3 Holland from Plaintiff's fees. Moreover, the cost for the new psychological
4 evaluation provider shall not exceed \$4,000.00 per evaluation.
5

6 THE COURT FURTHER ORDERS that the Court shall not entertain
7 requests to modify the Defendant's visitation with the minor children until he
8 completes the psychological evaluation.
9

10 THE COURT FURTHER ORDERS that a return hearing is scheduled on the
11 psychological evaluation on September 16, 2021, at 9:00 a.m. However, if the
12 evaluation is completed more quickly, either Party may request a hearing sooner in
13 time.
14

15 THE COURT FURTHER ORDERS that Daniel Marks, Esq., is selected as
16 the receiver for Defendant's business, to wit: Bellisario Law, P.C.
17

18 THE COURT FURTHER ORDERS that Beau D. Johnson, CPA, CVA, is
19 selected as the accountant to conduct an audit for Defendant's IOLTA account, to
20 wit: Bellisario Law, P.C.
21

22 THE COURT FURTHER ORDERS that the Plaintiff's request to reduce
23 child support arrears to judgment through January 31, 2021, is granted and
24 collectable by any and all legal means upon the filing of an updated Schedule of
25 Arrears.
26

1 THE COURT FURTHER ORDERS that the Plaintiff's request to reduce
2 temporary spousal support arrears to judgment through January 31, 2021, is granted
3 and collectable by any and all legal means upon the filing of an updated Schedule
4 of Arrears.
5

6 THE COURT FURTHER ORDERS that Plaintiff's request for attorney fees
7 and costs is deferred.
8

9 Statutory Notices:

10 The following statutory notices relating to the custody of minor children are
11 applicable to the Parties:
12

13 The Parties are put on notice of the following provision of *NRS* §125C.006,
14 which states:

15 1. If primary physical custody has been established
16 pursuant to an order, judgment or decree of a court and the
17 custodial parent intends to relocate his or her residence to a
18 place outside of this State or to a place within this State that
19 is at such a distance that would substantially impair the
20 ability of the other parent to maintain a meaningful
21 relationship with the child, and the custodial parent desires
22 to take the child with him or her, the custodial parent shall,
23 before relocating:

24 (a) Attempt to obtain the written consent of the
25 noncustodial parent to relocate with the child; and

26 (b) If the noncustodial parent refuses to give that
27 consent, petition the court for permission to relocate
28 with the child.

2. The court may award reasonable attorney's fees and costs
to the custodial parent if the court finds that the

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noncustodial parent refused to consent to the custodial parent's relocation with the child:

- (a) Without having reasonable grounds for such refusal, or
- (b) For the purpose of harassing the custodial parent.

3. A parent who relocates with a child pursuant to this section without the written consent of the noncustodial parent or the permission of the court is subject to the provisions of NRS 200.359.

Both Parties shall be bound by the provisions of *NRS* §125C.0045(6) which states:

PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY AS PROVIDED IN NRS § 193.130. NRS § 200.359 provides that every person having a limited right of custody to a child or any parent having no right of custody to the child who willfully detains, conceals or removes the child from a parent, guardian or other person having lawful custody or a right of visitation of the child in violation of an order of this court, or removes the child from the jurisdiction of the court without the consent of either the court or all persons who have the right to custody or visitation is subject to being punished for a category D felony as provided in NRS §193.130.

Pursuant to *NRS* §125C.0045(7), the terms of the Hague Convention of October 25, 1980, adopted by the 14th Session of the Hague Conference on Private International Law, apply if a parent abducts or wrongfully retains a child in a foreign country.

\\ \

1 The minor children's habitual residence is located in the United States of
2 America. *NRS* § 125C.0045 (7) and (8) specifically provide as follows:

3
4 Section 7. In addition to the language required pursuant to subsection
5 6, all orders authorized by this section must specify that the terms of the
6 Hague Convention of October 25, 1980, adopted by the 14th Session of the
7 Hague Conference on Private International Law, apply if a parent abducts or
wrongfully retains a child in a foreign country.

8 Section 8. If a parent of the child lives in a foreign country or has
9 significant commitments in a foreign country:

10 (a) The parties may agree, and the Court shall include in the
11 Order for custody of the child, that the United States is the
12 country of habitual residence of the child for the purposes of
13 applying the terms of the Hague Convention as set forth in
14 Subsection 7.

15 (b) Upon motion of the parties, the Court may order the
16 parent to post a bond if the Court determines that the parent
17 poses an imminent risk of wrongfully removing or
18 concealing the child outside the country of habitual
19 residence. The bond must be in an amount determined by the
20 Court and may be used only to pay for the cost of locating the
21 child and returning him to his habitual residence if the child
22 is wrongfully removed from or concealed outside the country
23 of habitual residence. The fact that a parent has significant
24 commitments in a foreign country does not create a
25 presumption that the parent poses an imminent risk of
26 wrongfully removing or concealing the child.
27
28

1 The Parties are further put on notice that they are subject to the provisions of
2 *NRS* §31A and *NRS* § 125.450 regarding the collection of delinquent child support
3 payments.
4

5 The Parties are further put on notice that either Party may request a review of
6 child support pursuant to *NRS* §125B.145.
7

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1 The Parties shall submit the information required in *NRS* §125B.055, *NRS*
2 §125.130 and *NRS* §125.230 on a separate form to the Court and the Welfare
3 Division of the Department of Human Resources within ten (10) days from the date
4 the Decree in this matter is filed. Such information shall be maintained by the
5 Clerk in a confidential manner and not part of the public record. The Parties shall
6 update the information filed with the Court and the Welfare Division of the
7 Department of Human Resources within ten (10) days should any of that
8 information become inaccurate.

Dated this 26th day of June, 2021

11 IT IS SO ORDERED.

14 Submitted this 25th day of
15 June, 2021.

16 **ROBERTS STOFFEL FAMILY**
17 **LAW GROUP**

18
19 By: Amanda M. Roberts
20 Amanda M. Roberts, Esq.
21 State of Nevada Bar No. 9294
22 4411 South Pecos Road
23 Las Vegas, Nevada 89121
24 PH: (702) 474-7007
FAX: (702) 474-7477
EMAIL: efile@lvfamilylaw.com

Approved as to Content and Form:

30A 9B5 1CA2 8CA8
Mary Perry
District Court Judge

By: _____
Bradley Bellisario
7100 Grand Montecito Pkwy., #2054
Las Vegas, Nevada 89149
PH: (702) 936-4800
FAX: (702) 936-4801
EMAIL: bradb@bellisariolaw.com

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Emily Bellisario, Plaintiff

CASE NO: D-20-605263-D

7 vs.

DEPT. NO. Department P

8 Bradley John Bellisario,
9 Defendant.

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Order was served via the court's electronic eFile system to all
recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 6/26/2021

15 Amanda Roberts

efile@lvfamilylaw.com

16 Bradley Bellisario

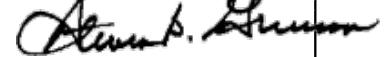
bradb@bellisariolaw.com

17 Bradley Bellisario

bradb@bellisariolaw.com

18 Linda Bell

dept07lc@clarkcountycourts.us



1 **NEOJ**

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

4 **ROBERTS STOFFEL FAMILY LAW GROUP**

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6 Las Vegas, Nevada 89121

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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,

14 Plaintiff,

15 v.

16 BRADLEY BELLISARIO,

17 Defendant.

) Case No: D-20-605263-D

) Dept No: P

)

)

) **NOTICE OF ENTRY OF ORDER**
) **AFTER HEARING**

)

) Date of Hearing: June 16, 2021

) Time of Hearing: 10:00 a.m.

)

)

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1 PLEASE TAKE NOTICE an Order After Hearing was duly entered on the
2 26th day of May, 2021, a copy of which is attached hereto and fully incorporated
3 herein by reference.
4

5 DATED this 28th day of June, 2021.

6 **ROBERTS STOFFEL FAMILY LAW GROUP**

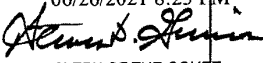
7
8 By: Amanda M. Roberts

9 Amanda M. Roberts, Esq.
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11 4411 South Pecos Road
12 Las Vegas, Nevada 89121
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15 EMAIL: efile@lvfamilylaw.com
16 Attorney for Plaintiff, Emily Bellisario
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Bradley Bellisario
Email: Bradb@bellisariolaw.com
Defendant *in proper person*

OBnier


 CLERK OF THE COURT

1 **ORDR**

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

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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.

)

16 **ORDER AFTER HEARING**

17 BRADLEY BELLISARIO,

)

)

18 Defendant.

)

19 Date of Hearing: June 16, 2021

20 Time of Hearing: 10:00 a.m.

21 THIS MATTER having come before the Court on the 16th day of June,

22 2021, on Defendant's Motion for an Order to Show Cause and the Plaintiff's

23 Opposition and Countermotion for an award of attorney fees and costs. The

24 Plaintiff, Emily Bellisario, being present and represented, by and through her

25 attorney of record, Amanda M. Roberts, Esq., of Roberts Stoffel Family Law

26 Group, and the Defendant, Bradley Bellisario, being present in proper person.

27 ///

1 THE COURT HEREBY FINDS there is no finding of contempt.

2 NOW THEREFORE,

3 THE COURT HEREBY ORDERS that the Defendant's request for the
4 issuance of an Order to Show Cause is denied.
5

6 THE COURT FURTHER ORDERS that the receiver and accountant shall
7 get copies of all records received regarding the Defendant's IOLTA trust account,
8 the Court wants the Plaintiff's Counsel to limit her review of those records in this
9 matter and the record shall not be released to the Plaintiff.
10

11 THE COURT FURTHER ORDERS that any outstanding Orders shall be
12 prepared and submitted forthwith.
13

14 THE COURT FURTHER ORDERS that the Plaintiff's request for an award
15 of attorney fees and costs is granted. The Plaintiff shall file a Memorandum of Fees
16 from the date of Notice of Entry
17 and Costs within ten (10) days (~~i.e., June 26, 2021~~) and the Defendant shall have
18 the statutory time to object. Thereafter, the Court shall issue an Order on the
19 amount of attorney fees being sought.
20

21 THE COURT FURTHER ORDERS that Ms. Roberts shall prepare the
22 Order.

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1 Both Parties shall be bound by the provisions of *NRS* §125C.0045(6) which
2 states:

3 *PENALTY FOR VIOLATION OF ORDER: THE*
4 *ABDUCTION, CONCEALMENT OR DETENTION OF A*
5 *CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE*
6 *AS A CATEGORY D FELONY AS PROVIDED IN NRS §*
7 *193.130. NRS § 200.359 provides that every person having a*
8 *limited right of custody to a child or any parent having no right*
9 *of custody to the child who willfully detains, conceals or*
10 *removes the child from a parent, guardian or other person*
11 *having lawful custody or a right of visitation of the child in*
12 *violation of an order of this court, or removes the child from the*
13 *jurisdiction of the court without the consent of either the court*
14 *or all persons who have the right to custody or visitation is*
15 *subject to being punished for a category D felony as provided in*
16 *NRS §193.130.*

17 Pursuant to *NRS* §125C.0045(7), the terms of the Hague Convention of
18 October 25, 1980, adopted by the 14th Session of the Hague Conference on Private
19 International Law, apply if a parent abducts or wrongfully retains a child in a
20 foreign country.

21 The minor children's habitual residence is located in the United States of
22 America. *NRS* § 125C.0045 (7) and (8) specifically provide as follows:

23 Section 7. In addition to the language required pursuant to subsection
24 6, all orders authorized by this section must specify that the terms of the
25 Hague Convention of October 25, 1980, adopted by the 14th Session of the
26 Hague Conference on Private International Law, apply if a parent abducts or
27 wrongfully retains a child in a foreign country.

28 Section 8. If a parent of the child lives in a foreign country or has
significant commitments in a foreign country:

1
2 (a) The parties may agree, and the Court shall include in the
3 Order for custody of the child, that the United States is the
4 country of habitual residence of the child for the purposes of
5 applying the terms of the Hague Convention as set forth in
6 Subsection 7.

7 (b) Upon motion of the parties, the Court may order the
8 parent to post a bond if the Court determines that the parent
9 poses an imminent risk of wrongfully removing or
10 concealing the child outside the country of habitual
11 residence. The bond must be in an amount determined by the
12 Court and may be used only to pay for the cost of locating the
13 child and returning him to his habitual residence if the child
14 is wrongfully removed from or concealed outside the country
15 of habitual residence. The fact that a parent has significant
16 commitments in a foreign country does not create a
17 presumption that the parent poses an imminent risk of
18 wrongfully removing or concealing the child.

19 The Parties are further put on notice that they are subject to the provisions of
20 *NRS* §31A and *NRS* § 125.450 regarding the collection of delinquent child support
21 payments.

22 The Parties are further put on notice that either Party may request a review of
23 child support pursuant to *NRS* §125B.145.

24 ///

25 ///

26 ///

27 ///

1 The Parties shall submit the information required in *NRS* §125B.055, *NRS*
2 §125.130 and *NRS* §125.230 on a separate form to the Court and the Welfare
3 Division of the Department of Human Resources within ten (10) days from the date
4 the Decree in this matter is filed. Such information shall be maintained by the
5 Clerk in a confidential manner and not part of the public record. The Parties shall
6 update the information filed with the Court and the Welfare Division of the
7 Department of Human Resources within ten (10) days should any of that
8 information become inaccurate.

11 IT IS SO ORDERED.

Dated this 26th day of June, 2021

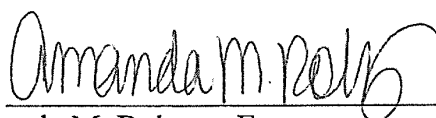


Approved as to Content and Form:

538 D2E B9D8 5856
Mary Perry
District Court Judge

15 Submitted this 25th day of
16 June, 2021.

18 **ROBERTS STOFFEL FAMILY
LAW GROUP**

19 By: 
20 Amanda M. Roberts, Esq.
21 State of Nevada Bar No. 9294
22 4411 South Pecos Road
23 Las Vegas, Nevada 89121
24 PH: (702) 474-7007
25 FAX: (702) 474-7477
26 EMAIL: efile@lvfamilylaw.com

By: _____
Bradley Bellisario
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EMAIL: bradb@bellisariolaw.com

1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Emily Bellisario, Plaintiff

CASE NO: D-20-605263-D

7 vs.

DEPT. NO. Department P

8 Bradley John Bellisario,
9 Defendant.

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Order was served via the court's electronic eFile system to all
recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 6/26/2021

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efile@lvfamilylaw.com

16 Bradley Bellisario

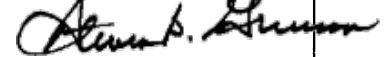
bradb@bellisariolaw.com

17 Bradley Bellisario

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18 Linda Bell

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2 Amanda M. Roberts, Esq.
3 State Bar of Nevada No. 9294
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9 EMAIL: efile@lvfamilylaw.com
10 Attorneys for Plaintiff, Emily Bellisario

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

11	EMILY BELLISARIO,) Case No: D-20-605263-D
12	Plaintiff,) Dept No: P
13	v.)
14	BRADLEY BELLISARIO,) NOTICE OF ENTRY OF ORDER
15	Defendant.) AFTER HEARING
16) Date of Hearing: May 18, 2021
17) Time of Hearing: 11:00 a.m.
18)

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1 PLEASE TAKE NOTICE an Order After Hearing was duly entered on the
2 26th day of May, 2021, a copy of which is attached hereto and fully incorporated
3 herein by reference.
4

5 DATED this 28th day of June, 2021.

6 **ROBERTS STOFFEL FAMILY LAW GROUP**

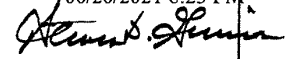
7
8 By: Amanda M. Roberts

9 Amanda M. Roberts, Esq.
10 State of Nevada Bar No. 9294
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16 Attorney for Plaintiff, Emily Bellisario
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Bradley Bellisario
Email: Bradb@bellisariolaw.com
Defendant *in proper person*


Employee of Roberts Stoffel Family LP


 CLERK OF THE COURT
1 ORDER

2 Amanda M. Roberts, Esq.
 3 State Bar of Nevada No. 9294
ROBERTS STOFFEL FAMILY LAW GROUP
 4 4411 S. Pecos Road
 Las Vegas, Nevada 89121
 5 PH: (702) 474-7007
 FAX: (702) 474-7477
 6 EMAIL: efile@lvfamilylaw.com
 7 Attorneys for Plaintiff, Emily Bellisario

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

10	EMILY BELLISARIO,) Case No: D-20-605263-D
11) Dept No: P
12	Plaintiff,)
13	v.)
14	BRADLEY BELLISARIO,) ORDER AFTER HEARING
15)
16	Defendant.) Date of Hearing: May 18, 2021
17) Time of Hearing: 11:00 a.m.

18 THIS MATTER having come before the Court on the 18th day of May, 2021,
 19 for multiple Motion, Opposition, and Reply hearings. The Plaintiff, Emily
 20 Bellisario, being present and represented, by and through her attorney of record,
 21 Amanda M. Roberts, Esq., of Roberts Stoffel Family Law Group, and the
 22 Defendant, Bradley Bellisario, being present in proper person. The Parties and
 23 Counsel having appeared via Blue Jeans application due to the Administrative
 24
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 28

1 Orders. The Court having heard the arguments and reviewed the pleadings on file
2 herein hereby finds and Orders as follows:

3 NOW THEREFORE,
4

5 THE COURT HEREBY ORDERS that Defendant's request to reconsider the
6 Order After Hearing from January 25, 2021, is denied.

7 THE COURT FURTHER ORDERS that Defendant's request to reconsider
8 the Protection Order from April 6, 2021, is denied.

10 THE COURT FURTHER ORDERS that Defendant's request to renew his
11 Motion to Disqualify Judge Perry is denied.

12 THE COURT FURTHER ORDERS that Defendant's request to remove
13 SCRAM is granted.

14 THE COURT FURTHER ORDERS that Defendant shall produce an updated
15 SCRAM report through May 18, 2021, by Friday, May 21, 2021, at noon.

16 THE COURT FURTHER ORDERS that Defendant shall provide his work
17 search as previously Order and those shall be filed and served by Friday, May 21,
18 2021, at noon.

19 THE COURT FURTHER ORDERS that Plaintiff's request for Defendant to
20 be drug tested is denied.

21 THE COURT FURTHER ORDERS that Plaintiff's request for Defendant to
22 be deemed a vexatious litigant is denied., at the present time.

1 THE COURT FURTHER ORDERS that Plaintiff's request to lift the
2 Defendant's Lis Pendens on the real property at 1913 Sondrio Drive, Las Vegas,
3 Nevada 89134 ("real property") is granted.
4

5 THE COURT FURTHER ORDERS that Bradley shall not file another Lis
6 Pendens on the real property at 1913 Sondrio Drive, Las Vegas, Nevada 89134.
7

8 THE COURT FURTHER ORDERS that any issues regarding Bradley's
9 alleged interest in the real property is a Trial issue and is not eliminated by allowing
10 Emily to refinance the real property at 1913 Sondrio Drive, Las Vegas, Nevada
11 89134.
12

13 THE COURT FURTHER ORDERS that the Plaintiff shall be permitted to
14 refinance the real property at 1913 Sondrio Drive, Las Vegas, Nevada 89134 is
15 granted; however, Plaintiff shall not remove all of the equity in the real property.
16

17 THE COURT FURTHER ORDERS that the Defendant shall have until
18 Friday, May 21, 2021, at noon to file and serve upon the Plaintiff's Counsel the
19 name of three (3) qualified providers from the Outsource Provider List to conduct
20 the psychological evaluation of the Parties. If the Defendant fails to provide the
21 names by Friday, May 21, 2021, at noon, then the psychological evaluations shall
22 be completed by Dr. Holland; however, if the Defendant does provide the names by
23 Friday, May 21, 2021, at noon, then the Plaintiff shall have until Monday, May 24,
24 2021, at noon to select one of the names from the list.
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1 THE COURT FURTHER ORDERS that if a new psychological evaluation
2 provider is selected, Defendant shall reimburse anything already expended by Dr.
3 Holland from Plaintiff's fees. Moreover, the cost for the new psychological
4 evaluation provider shall not exceed \$4,000.00 per evaluation.
5

6 THE COURT FURTHER ORDERS that the Court shall not entertain
7 requests to modify the Defendant's visitation with the minor children until he
8 completes the psychological evaluation.
9

10 THE COURT FURTHER ORDERS that a return hearing is scheduled on the
11 psychological evaluation on September 16, 2021, at 9:00 a.m. However, if the
12 evaluation is completed more quickly, either Party may request a hearing sooner in
13 time.
14

15 THE COURT FURTHER ORDERS that Daniel Marks, Esq., is selected as
16 the receiver for Defendant's business, to wit: Bellisario Law, P.C.
17

18 THE COURT FURTHER ORDERS that Beau D. Johnson, CPA, CVA, is
19 selected as the accountant to conduct an audit for Defendant's IOLTA account, to
20 wit: Bellisario Law, P.C.
21

22 THE COURT FURTHER ORDERS that the Plaintiff's request to reduce
23 child support arrears to judgment through January 31, 2021, is granted and
24 collectable by any and all legal means upon the filing of an updated Schedule of
25 Arrears.
26
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1 THE COURT FURTHER ORDERS that the Plaintiff's request to reduce
2 temporary spousal support arrears to judgment through January 31, 2021, is granted
3 and collectable by any and all legal means upon the filing of an updated Schedule
4 of Arrears.
5

6 THE COURT FURTHER ORDERS that Plaintiff's request for attorney fees
7 and costs is deferred.
8

9 Statutory Notices:

10 The following statutory notices relating to the custody of minor children are
11 applicable to the Parties:
12

13 The Parties are put on notice of the following provision of *NRS* §125C.006,
14 which states:

15 1. If primary physical custody has been established
16 pursuant to an order, judgment or decree of a court and the
17 custodial parent intends to relocate his or her residence to a
18 place outside of this State or to a place within this State that
19 is at such a distance that would substantially impair the
20 ability of the other parent to maintain a meaningful
21 relationship with the child, and the custodial parent desires
22 to take the child with him or her, the custodial parent shall,
23 before relocating:

- 24 (a) Attempt to obtain the written consent of the
25 noncustodial parent to relocate with the child; and
26 (b) If the noncustodial parent refuses to give that
27 consent, petition the court for permission to relocate
28 with the child.

2. The court may award reasonable attorney's fees and costs
to the custodial parent if the court finds that the

1 noncustodial parent refused to consent to the custodial
2 parent's relocation with the child:

- 3 (a) Without having reasonable grounds for such refusal, or
4 (b) For the purpose of harassing the custodial parent.

5 3. A parent who relocates with a child pursuant to this
6 section without the written consent of the noncustodial
7 parent or the permission of the court is subject to the
provisions of NRS 200.359.

8 Both Parties shall be bound by the provisions of *NRS* §125C.0045(6) which
9 states:
10

11 *PENALTY FOR VIOLATION OF ORDER:* THE
12 ABDUCTION, CONCEALMENT OR DETENTION OF A
13 CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE
14 AS A CATEGORY D FELONY AS PROVIDED IN *NRS* §
15 193.130. *NRS* § 200.359 provides that every person having a
16 limited right of custody to a child or any parent having no right
17 of custody to the child who willfully detains, conceals or
18 removes the child from a parent, guardian or other person
19 having lawful custody or a right of visitation of the child in
violation of an order of this court, or removes the child from the
jurisdiction of the court without the consent of either the court
or all persons who have the right to custody or visitation is
subject to being punished for a category D felony as provided in
NRS §193.130.

20 Pursuant to *NRS* §125C.0045(7), the terms of the Hague Convention of
21 October 25, 1980, adopted by the 14th Session of the Hague Conference on Private
22 International Law, apply if a parent abducts or wrongfully retains a child in a
23 foreign country.
24

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1 The minor children's habitual residence is located in the United States of
2 America. *NRS* § 125C.0045 (7) and (8) specifically provide as follows:
3

4 Section 7. In addition to the language required pursuant to subsection
5 6, all orders authorized by this section must specify that the terms of the
6 Hague Convention of October 25, 1980, adopted by the 14th Session of the
7 Hague Conference on Private International Law, apply if a parent abducts or
wrongfully retains a child in a foreign country.

8 Section 8. If a parent of the child lives in a foreign country or has
9 significant commitments in a foreign country:

10 (a) The parties may agree, and the Court shall include in the
11 Order for custody of the child, that the United States is the
12 country of habitual residence of the child for the purposes of
13 applying the terms of the Hague Convention as set forth in
14 Subsection 7.

15 (b) Upon motion of the parties, the Court may order the
16 parent to post a bond if the Court determines that the parent
17 poses an imminent risk of wrongfully removing or
18 concealing the child outside the country of habitual
19 residence. The bond must be in an amount determined by the
20 Court and may be used only to pay for the cost of locating the
21 child and returning him to his habitual residence if the child
22 is wrongfully removed from or concealed outside the country
23 of habitual residence. The fact that a parent has significant
24 commitments in a foreign country does not create a
25 presumption that the parent poses an imminent risk of
26 wrongfully removing or concealing the child.
27
28

1 The Parties are further put on notice that they are subject to the provisions of
2 *NRS* §31A and *NRS* § 125.450 regarding the collection of delinquent child support
3 payments.
4

5 The Parties are further put on notice that either Party may request a review of
6 child support pursuant to *NRS* §125B.145.
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1 The Parties shall submit the information required in *NRS* §125B.055, *NRS*
2 §125.130 and *NRS* §125.230 on a separate form to the Court and the Welfare
3 Division of the Department of Human Resources within ten (10) days from the date
4 the Decree in this matter is filed. Such information shall be maintained by the
5 Clerk in a confidential manner and not part of the public record. The Parties shall
6 update the information filed with the Court and the Welfare Division of the
7 Department of Human Resources within ten (10) days should any of that
8 information become inaccurate.

Dated this 26th day of June, 2021

11 IT IS SO ORDERED.

14 Submitted this 25th day of
15 June, 2021.

16 **ROBERTS STOFFEL FAMILY**
17 **LAW GROUP**

19 By: Amanda M. Roberts
20 Amanda M. Roberts, Esq.
21 State of Nevada Bar No. 9294
22 4411 South Pecos Road
23 Las Vegas, Nevada 89121
24 PH: (702) 474-7007
FAX: (702) 474-7477
EMAIL: efile@lvfamilylaw.com

Approved as to Content and Form:

30A 9B5 1CA2 8CA8
Mary Perry
District Court Judge

By: _____
Bradley Bellisario
7100 Grand Montecito Pkwy., #2054
Las Vegas, Nevada 89149
PH: (702) 936-4800
FAX: (702) 936-4801
EMAIL: bradb@bellisariolaw.com

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA
4

5
6 Emily Bellisario, Plaintiff

CASE NO: D-20-605263-D

7 vs.

DEPT. NO. Department P

8 Bradley John Bellisario,
9 Defendant.

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Order was served via the court's electronic eFile system to all
recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 6/26/2021

15 Amanda Roberts

efile@lvfamilylaw.com

16 Bradley Bellisario

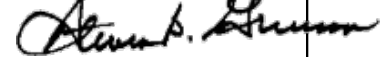
bradb@bellisariolaw.com

17 Bradley Bellisario

bradb@bellisariolaw.com

18 Linda Bell

dept07lc@clarkcountycourts.us



DCRR

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

ROBERTS STOFFEL FAMILY LAW GROUP

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

**DISTRICT COURT
CLARK COUNTY, NEVADA**

EMILY BELLISARIO,

Plaintiff,

v.

BRADLEY BELLISARIO,

Defendant.

Case No: D-20-605263-D

Dept No: P

(Discovery Commissioner)

**DISCOVERY COMMISSIONER'S
REPORT AND
RECOMMENDATIONS**

Date and Time of Hearing: June 16, 2021

Time of Hearing: 1:00 p.m.

The Plaintiff, Emily Bellisario, not being present, but represented by Amanda M. Roberts, Esq., of Roberts Stoffel Family Law Group, and the Defendant, Bradley Bellisario, being present *in proper person*. The Court, litigants and/or Counsel appearing through Blue Jeans.

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I.
RECOMMENDATIONS

IT IS HEREBY RECOMMENDED that with regard to the argument that Defendant has not complied with *EDCR* § 16.2, there is not sufficient evidence in front of the Court to suggest that he has failed to comply with that in whole or even in part. (Video Timestamp 1:19:25)

IT IS FURTHER RECOMMENDED that the Plaintiff's Motion will be denied in part and granted in part. (Video Timestamp 1:19:55)

IT IS FURTHER RECOMMENDED that with regard to AAA Flooring and Allied Flooring Services, Inc., the Subpoenas may go forward with limitations as follows: documents that are sufficient to prove period of employment, and wage or salary or other payment paid between August, 2014 to present. No other documentation is appropriate. (Video Timestamp 1:20:00)

IT IS FURTHER RECOMMENDED that Defendant will need to amend his request as it relates to AAA Flooring and Allied Flooring Services, Inc. (Video Timestamp 1:20:45)

IT IS FURTHER RECOMMENDED that the Motion is denied as to the Nevada Board of Examiners for Donna Wilburn, MFT. The credibility of a witness is a valid pursuit of discovery. (Video Timestamp 1:20:54)

1 IT IS FURTHER RECOMMENDED that the Motion is granted as it relates
2 to the Nevada State Bar. The Subpoena cannot be sent as requested by the
3 Defendant. (Video Timestamp 1:21:10)
4

5 IT IS FURTHER RECOMMENDED that the Motion is denied as to Bank of
6 America, J&A Consulting Group, Johnson Martin Advisors, Chase Bank, LVMP,
7 Wells Fargo, and Nevada State Bank (Video Timestamp 1:21:13)
8

9 IT IS FURTHER RECOMMENDED that the request for fees by the Plaintiff
10 is denied. (Video Timestamp 1:21:45)
11

12 IT IS FURTHER RECOMMENDED that Attorney Roberts shall prepare the
13 Report and Recommendation and Mr. Bellisario shall review and sign off as to
14 form and content and file it with the Court within the next fourteen (14) days to
15 avoid sanction. (Video Timestamp 1:21:53)
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1 IT IS FURTHER RECOMMENDED that a status check is set for July 7,
2 2021 at 1:30 p.m., regarding the submission of the Report and Recommendation.
3 The Parties shall not appear if the Report and Recommendation is submitted timely.
4
5 (Video Timestamp 1:22:11)

6 DATED this 6th day of July, 2021.

7
8 Jay Young
9 DISCOVERY COMMISSIONER

10
11 Submitted this 2nd day of
12 July, 2021.

13 **ROBERTS STOFFEL FAMILY**
14 **LAW GROUP**

15
16 By: Amanda M. Roberts
17 Amanda M. Roberts, Esq.
18 State of Nevada Bar No. 9294
19 4411 South Pecos Road
20 Las Vegas, Nevada 89121
21 PH: (702) 474-7007
22 FAX: (702) 474-7477
23 EMAIL: efile@lvfamilylaw.com
24 Attorneys for Plaintiff

Approved as to Content and Form:

By: _____
Bradley Bellisario
7100 Grand Montecito Pkwy., #2054
Las Vegas, Nevada 89149
PH: (702) 936-4800
FAX: (702) 936-4801
EMAIL: bradb@bellisariolaw.com
Defendant, in proper person¹

25
26
27 ¹ A copy of the letter submitted to Discovery regarding Mr. Bellisario not signing is attached hereto as Exhibit "1".

EXHIBIT “1”

EXHIBIT “1”

EXHIBIT “1”



ROBERTS STOFFEL
FAMILY LAW GROUP

Amanda M. Roberts, Esq.
Jason P. Stoffel, Esq.
Lynn N. Hughes, Esq.
Gary M. Zernich, Esq.

4411 South Pecos Road
Las Vegas, Nevada 89121

July 2, 2021

Sent Via Email

FamilyDiscoveryInbox@ClarkCountyCourts.us

Discovery Commissioner
Family Court
601 N. Pecos Road
Las Vegas, Nevada 89101

Re: Bellisario v. Bellisario (D-20-605263-D)

Dear Judge Young:

Enclosed please find the Discovery Commissioner's Report and Recommendation from the hearing on June 16, 2021. Pursuant to EDCR § 5.521, I am submitting this Order absent the signature of Mr. Bellisario. On June 25, 2021, the proposed Order was sent to the Mr. Bellisario via electronic service and no response has been received (see enclosed courtesy copy). Having reviewed the Court Minutes and video from the hearing on June 25, 2021, I believe that the proposed Order complies with the Court's Order and so submit it absent the signature of Mr. Bellisario.

Thank you in advance for your assistance for your assistance in this matter. Should you have questions or concerns, please do not hesitate to contact my office.

Sincerely,

Amanda M. Roberts, Esq.

Enclosures as stated
cc: Bradley Bellisario

6/25/2021 2:42 PM



ROBERTS STOFFEL
FAMILY LAW GROUP

Amanda M. Roberts, Esq.
Jason P. Stoffel, Esq.
Lynn N. Hughes, Esq.
Gary M. Zernich, Esq.

4411 South Pecos Road
Las Vegas, Nevada 89121

June 25, 2021

Sent Via Eservice Only

Bradley Bellisario
7100 Grand Montecito Pkwy., #2054
Las Vegas, Nevada 89149

Re: Bellisario v. Bellisario (D-20-605263-D)

Dear Mr. Bellisario:

Enclosed you will find the drafted Discovery Commissioner's Report and Recommendations from the June 16, 2021 hearing. Upon your review, if you have no requested revisions, please sign the enclosed Report and Recommendations and return it to my office as soon as possible. Alternatively, if you have requested revisions, please advise in writing as soon as possible. In the event I do not receive a response from your office within the next seven (7) days (July 2, 2021), I will submit the Report and Recommendations to Court, absent your signature of approval.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Amanda M. Roberts".

Amanda M. Roberts, Esq.

Enclosures as stated
cc: Client

1 **DCRR**

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,

14 Plaintiff,

15 v.

16 BRADLEY BELLISARIO,

17 Defendant.

Case No: D-20-605263-D

Dept No: P

(Discovery Commissioner)

**DISCOVERY COMMISSIONER'S
REPORT AND
RECOMMENDATIONS**

18 Date and Time of Hearing: June 16, 2021

19 Time of Hearing: 1:00 p.m.

20 The Plaintiff, Emily Bellisario, not being present, but represented by Amanda

21 M. Roberts, Esq., of Roberts Stoffel Family Law Group, and the Defendant,

22 Bradley Bellisario, being present *in proper person*. The Court, litigants and/or

23 Counsel appearing through Blue Jeans.

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I.
RECOMMENDATIONS

IT IS HEREBY RECOMMENDED that with regard to the argument that Defendant has not complied with *EDCR* § 16.2, there is not sufficient evidence in front of the Court to suggest that he has failed to comply with that in whole or even in part. (Video Timestamp 1:19:25)

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8

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1 IT IS FURTHER RECOMMENDED that a status check is set for July 7,
2 2021 at 1:30 p.m., regarding the submission of the Report and Recommendation.
3
4 The Parties shall not appear if the Report and Recommendation is submitted timely.
5 (Video Timestamp 1:22:11)

6 DATED this _____ day of _____, 2021.
7
8

9 _____
10 DISCOVERY COMMISSIONER

11 Submitted this _____ day of
12 _____, 2021.

Approved as to Content and Form:

13 **ROBERTS STOFFEL FAMILY**
14 **LAW GROUP**
15

16 By: _____
17 Amanda M. Roberts, Esq.
18 State of Nevada Bar No. 9294
19 4411 South Pecos Road
20 Las Vegas, Nevada 89121
21 PH: (702) 474-7007
22 FAX: (702) 474-7477
23 EMAIL: efile@lvfamilylaw.com
24 Attorneys for Plaintiff
25
26
27
28

By: _____
Bradley Bellisario
7100 Grand Montecito Pkwy., #2054
Las Vegas, Nevada 89149
PH: (702) 936-4800
FAX: (702) 936-4801
EMAIL: bradb@bellisariolaw.com
Defendant, in proper person

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DISTRICT COURT
CLARK COUNTY, NEVADA

EMILY BELLISARIO,

Plaintiff,

v.

BRADLEY BELLISARIO,

Defendant.

Case No: D-20-605263-D

Dept No: P/ Discovery

NOTICE

Pursuant to *NRCP* § 16.3(c)(2), you are hereby notified that within fourteen (14) days after being served with a report any party may file and serve written objections to the recommendations. Written authorities may be filed with an objection, but are not mandatory. If written authorities are filed, any other party may file and serve responding authorities within seven (7) days after being served with the objections.

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Objection time will expire on _____, 2021.

A copy of the foregoing Discovery Commissioner's Report was:

_____ Mailed to Plaintiff/Defendant/Petitioner/Respondent (circle) at the following address on the ____ day of _____, 2021, pursuant to *NRCP* § 5(b)(2)(C).

_____ Electronically filed and served upon Counsel on the ____ day of _____, 2021, pursuant to *NEFCR* § Rule 9.

Amanda M. Roberts. Esq.
Email: efile@lvfamilylaw.com
Attorneys for Plaintiff, Emily Bellisario

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

The Discovery Commissioner's Report is deemed received at the time it is e-served to a party or the party's attorney pursuant to *NEFCR* § 9(f). Alternatively, the Commissioner's Report is deemed received three (3) days after mailing to a party or the party's attorney or three (3) days after the clerk of the court deposits a copy of the Report in a folder of a party's lawyer in the Clerk's office pursuant to *NRCP* § 6(d).

Dated this ____ day of _____, 2021

Commissioner Designee