IN THE SUPREME COURT OF THE STATE OF NEVADA

BRADLEY JOHN BELLISARIO
Appellant,

v.

EMILY BELLISARIO,

Respondent.

Electronically Filed
Apr 08 2022 09:43 p.m.
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. 9 PART 1

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Docket 84128 Document 2022-11224

INDEX OF APPELLANT APPENDIX

VOLUME:	BATES NUMBER:
1	00001 – 00250
2	00251 - 00500
3	00501- 00750
4	00751 - 01000
5	01001- 01250
6	01251 - 01500
7	01501 - 01750
8	01751 - 02000
9	02001 - 02250
10	02251 - 02500
11	02501 - 02750
12	02751 - 03000
13	03001 – 03250
14	03251 – 03500
15	03501 – 03750
16	03751 – 04000
17	04000 – 04250

18	04251 – 04500
19	04501 – 04750
20	04751 – 05000

INDEX OF APPELLANT APPENDIX
CHRONOLOGICAL ORDER

VOL.	DATE	PLEADING	BATES NO.
1	03/05/2020	Complaint for Divorce	AA0001-7
1	03/09/2020	Motion for Primary Physical Custody, et al.	AA0008-41
1	03/09/2020	Exhibit Appendix to Motion for Primary Physical Custody, et al.	AA0042-110
1	03/09/2020	Emily Bellisario Financial Disclosure Form	AA0111-121
1	03/13/2020	Errata to Motion for Primary Physical Custody, et al.	AA0122-126
1	03/13/2020	Ex Parte Application for Order Shortening Time	AA0127-140
1	03/25/2020	Acceptance of Service	AA0141-142
1	04/09/2020	Answer and Counterclaim	AA0143-147
1	04/09/2020	Opposition to Motion for Primary Physical Custody, et al.	AA0148-157
1	04/09/2020	Exhibits in Support of Opposition to Motion for Primary Physical Custody, et al.	AA0158-249
1-2	04/13/2020	Order Setting Case Management Conference	AA0250-259
2	04/15/2020	Bradley Bellisario Financial Disclosure Form	AA0260-267
2	04/29/2020	Reply to Opposition	AA0268-283
2	04/29/2020	Exhibit Appendix to Reply	AA0284-300
2	04/29/2020	Reply to Counterclaim	AA0301-303
2	06/10/2020	Stipulation and Order dated June 10, 2020	AA0304-307
2	06/11/2020	Notice of Entry of Stipulation and Order dated June 11, 2020	AA0308-314
2	07/30/2020	Court Minutes from July 30, 2020, Hearing	AA0315-316
2	07/30/2020	Order for Supervised Visitation dated July 30, 2020	AA0317
2	07/31/2020	Notice of Entry of Order for Supervised Visitation dated July 31, 2020	AA0318-320
2	10/22/2020	Court Minutes from October 22, 2020, Hearing	AA0321-324
2	11/24/2020	Court Minutes from November 24, 2020, Hearing	AA0325-326
2	11/25/2020	Affidavit Regarding Grounds for Disqualification of Judge	AA0327-333
2	12/01/2020	Affidavit of Sandra L. Pomrenze	AA0334-336

2	12/03/2020	Notice of Defendant's Non-Compliance with Court Order	AA0337-338
2	12/03/2020	Notice of Plaintiff's Non-Compliance with Court Order	AA0339-343
2	12/10/2020	Order After Hearing of November 24, 2020	AA0344-347
2-3	12/10/2020	Motion to Show Cause Why Plaintiff and/or Plaintiff's Counsel Should Not Be Held in Contempt and Motion for Sanctions	AA0348-545
3	12/11/2020	Notice of Entry of Order From the November 24, 2020, Hearing	AA0546-552
3	12/16/2020	Notice of Discovery Dispute Conference	AA0553-555
3	12/23/2020	Emily Bellisario Financial Disclosure Form	AA0556-566
3	12/24/2020	Opposition to Defendant's Motion to Show Cause Why Plaintiff and/or Plaintiff's Counsel Should Not Be Held in Contempt and Motion for Sanctions; And Countermotion for an Award of Attorney's Fees and Costs	AA0567-581
3	01/11/2021	Peremptory Challenge	AA0582-583
3	01/11/2021	Certificate of Service	AA0584-586
3	01/11/2021	Motion to Strike Plaintiff's Peremptory Challenge	AA0587-595
3-4	01/11/2021	Motion for Relief from Order After Hearing Regarding Hearing on November 24, 2020	AA0596-811
4	01/13/2021	Opposition to Defendant's Motion to Strike Plaintiff's Peremptory Challenge; and Countermotion for and Award of Attorney's Fees and Costs	AA0812-821
4	01/15/2021	Notice of Hearing and Order Regarding Procedures	AA0822-826
4	01/20/2021	Decision and Order re: Peremptory Challenge	AA0827-829
4	01/20/2021	Notice of Department Reassignment	AA0830-832
4	01/20/2021	Order After Hearing on October 22, 2020	AA0833-837
4	01/21/2021	Notice of Vacating Hearing	AA0838
4	01/21/2021	Notice of Scheduling Status Check	AA0839
4	01/22/2021	Notice of Entry of Order From the October 22, 2020, Hearing	AA0840-847
4	01/24/2021	Order After Hearing on July 30, 2020	AA0848-855
4	01/25/2021	Court Minutes From Status Check on January 25, 2021	AA0856-858

4	01/25/2021	Transcript re: Hearing on January 25, 2021, Status Check	AA0859-863
4	01/25/2021	Notice of Entry of Order From the July 30, 2020, Hearing	AA0864-874
4	01/25/2021	Opposition to Defendant's Motion for Relief From Order After Hearing Regarding Hearing on November 24, 2020; And Countermotion for An Award of Attorney's Fees and Costs	AA0875-887
4	02/05/2021	Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA0888-931
4-5	02/05/2021	Exhibits in Support of Motion to Extend Protection Order, et al.	AA0932-1003
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
5	02/05/2021	Ex Parte Application for Order Shortening Time	AA1022-1033
5	02/07/2021	Bradley Bellisario's Financial Disclosure Form	AA1034-1040
5	02/08/2021	Order Shortening Time	AA1041-1043
5	02/08/2021	Affidavit of Service	AA1044
5	02/09/2021	Minute Order of February 9, 2021	AA1045-1046
5	02/09/2021	Motion to Compel Discovery, for Attorney's Fees and Costs, and Related Relief	AA1047-1072
5	02/09/2021	Exhibits in Support of Motion to Compel	AA1073-1153

5	02/09/2021	Ex Parte Motion for Continuance of Hearing Set for February 11, 2021, at 1:30 p.m.	AA1154-1204
5-6	02/09/2021	Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion and Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1205-1271
6	02/10/2021	Affidavit Regarding Grounds for Disqualification of Judge	AA1272-1351
6	02/11/2021	Motion to Disqualify Judge Pursant to NCJC 2.11	AA1352-1443
6-7	02/11/2021	Motion for Relief from Amended July 30, 2020, Order, July 30, 2020, Order, and October 22, 2020, Order	AA1444-1537
7	02/11/2021	Notice of Defendant's Objection to Judge Mary Perry Hearing Any Argument Related to Hearing Scheduled for February 11, 2021 at 1:30 p.m.	AA1538/-1541
7	02/11/2021	Court Minutes from February 11, 2021	AA1542-1545
7	02/11/2021	Transcript re: Hearing on February 11, 2021, on All Pending Motions	AA1546-1548
7	02/16/2021	Response to Defendant's Motion to Disqualify Judge	AA1549-1554
7	02/16/2021	Order	AA1555-1557
7	02/19/2021	Opposition to Plaintiff's Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver	AA1558-1661

		for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	
7	02/23/2021	Reply to Judge Mary Perry's Response to Defendant's Motion to Disqualify Judge	AA1662-1670
7	02/23/2021	Opposition to Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion et al.; and Countermotion for an Award of Attorney's Fees and Costs	AA1671-1688
7	02/23/2021	Exhibits in Support of Opposition to Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion et al.; and Countermotion for an Award of Attorney's Fees and Costs	AA1689-1703
7	02/23/2021	Opposition to Defendant's Motion to Disqualify Judge Pursuant to NCJC 2.11; and Countermotion for an Award of Attorney's Fees and Costs and Related Relief	AA1704-1720
7	02/23/2021	Exhibits in Support of Opposition to Defendant's Motion to Disqualify, et al.	AA1721-1730
7	02/26/2021	Ex Parte Application for Order Shortening Time on Defendant's Motion to Disqualify Judge	AA1731-1739
7	02/26/2021	Notice of Defendant's Objection to Plaintiff's Ex Parte Application for Order Shortening Time	AA1740-1744
7	03/02/2021	Order Shortening Time	AA1745-1747
7-8	03/02/2021	Notice of Entry of Order Shortening Time	AA1748-1752

8	03/02/2021	Certificate of Service	AA1753-1754
8	03/03/2021	Affidavit of Service	AA1755
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
8	03/04/2021	Court Minutes from March 4, 2021	AA1798
8	03/04/2021	Transcript re: March 4, 2021, Court Hearing on All Pending Motions	AA1799-1816
8	03/09/2021	Decision and Order	AA1817-1823
8	03/09/2021	Notice of Entry of Decision and Order	AA1824-1833
8	03/09/2021	Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1834-1877
8	03/09/2021	Exhibits in Support of Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1878-1949

8	03/09/2021	Ex Parte Application for Order Shortening Time	AA1950-1961
8	03/09/2021	Notice of Defendant's Intent to Seek Post-Order Relief	AA1962-1965
8	03/09/2021	Defendant's Motion for Reconsideration Regarding Defendant's Motion to Disqualify Judge Mary Perry	AA1966-1979
8	03/10/2021	Order After Hearing	AA1980-19852
8	03/10/2021	Notice of Entry of Order After Hearing	AA1983-1988
8	03/11/2021	Ex Parte Application for Order Shortening Time	AA1989-1997
8-9	03/12/2021	Notice of Defendant's Objection to Plaintiff's Ex Parte Application for Order Shortening Time Dated 03/11/2021	AA1998-2002
9	03/16/2021	Motion for Protective Order	AA2003-2051
9	03/17/2021	Court Minutes from March 17, 2021	AA2052-2053
9	03/17/2021	Opposition to Notice of Motion and Motion to Compel Discovery, for Attorney's Fees and Costs, and Related Relief	AA2054-2066
9	03/17/2021	Transcript re: Hearing on Motion to Compel Discovery on March 17, 2021	AA2067-2081
9	03/22/2021	Decision and Order	AA2082-2084
9	03/22/2021	Notice of Defendant's Intent to File Write of Mandamus and Motion to Stay Proceedings	AA2085-2090
9	03/23/2021	Notice of Rescheduling Hearings	AA2091-2092
9	03/30/2021	Opposition to Defendant's Motion for Relief From Amended July 30, 2020, Order, July 30, 2020, Order and October 22, 2020 Order; And Countermotion for An Award of Attorney's Fees and Costs	AA2093-2110
9	03/30/2021	Exhibits in Support of Opposition to Motion for Relief From Amended July 30, 2020 Order, et al.	AA2111-2120

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
9	04/05/2021	Ex Parte Motion for Continuance of Hearing Set for April 6, 2021, at 10:00 a.m.	AA2136-2141
9	04/06/2021	Discovery Commissioner's Report and Recommendations	AA2142-2149
9	04/06/2021	Order for Supervised Visitation	AA2150
9	04/06/2021	Order on Discovery Commissioner's Report and Recommendations	AA2151-2161
9	04/06/2021	Notice of Defendant's Objection to Order on Discovery Commissioner's Report and Recommendation	AA2162-2165
9	04/06/2021	Notice of Entry of Protection Order Against Domestic Violence	AA2166-2169
9	04/06/2021	Notice of Entry of Order for Supervised Visitations	AA2170-2174
9-10	04/06/2021	Transcript re: April 6, 2021, Hearing on All Pending Motions	AA2175-2270
10	04/07/2021	Court Minutes from April 7, 2021	AA2271-2272
10	04/07/2021	Transcript re: Hearing re: Status Check	AA2273-2284
10	04/08/2021	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	AA2285-2315
10	04/08/2021	Minute Order of April 8, 2021	AA2316-2317
10	04/08/2021	Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2318-2330
10	04/14/2021	Memorandum of Attorney's Fees and Costs	AA2331-2379
10	04/14/2021	Court Minutes from April 6, 2021	AA2380-2381
10	04/22/2021	Opposition to Defendant's Motion for Relief From Order After Hearing Regarding Hearing on January 25, 2021 and Motion for Leave to	AA2382-2400

		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	
10	04/22/2021	Exhibits in Support of 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	AA2401-2411
10	04/22/2021	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	AA2412-2424
10	04/22/2021	Exhibits in Support of Plaintiff's Opposition to Reconsider Order Against Domestic Violence Entered April 6, 2021; And Countermotion for An Award of Attorney's Fees and Costs	AA2425-2430
10	04/22/2021	Court Minutes from April 22, 2021	AA2431-2432
10	04/22/2021	Amended Order After Hearing	AA2433-2440
10	04/23/2021	Order on Discovery Commissioner's Report and Recommendations	AA2441-2451
10	04/23/2021	Notice of Defendant's Objection to Mary Perry Taking Any Further Action in This Matter	AA2452-2455
10	04/26/2021	Notice of Discovery Dispute Conference	AA2456-2458
10	04/26/2021	Notice of Entry of Amended Order After Hearing	AA2459-2469

10	04/27/2021	Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2470-2478
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
11	04/30/2021	Order After Hearing	AA2517-2527
11	05/01/2021	Motion for Order to Show Cause Why Plaintiff and Plaintiff's Counsel, Amanda Roberts, Esq., Should Not Be Held in Contempt	AA2528-2567
11	05/02/2021	Ex Parte Motion for Return of Children	AA2568-2600
11	05/03/2021	Objection to Defendant's Discovery Requests and Subpoenas	AA2601-2604
11	05/03/2021	Notice of Entry of Order After Hearing	AA2605-2618
11	05/03/2021	Motion for Protective Order Relating to Bradley's Discovery Requests and Subpoena's [sic], for an Award of Attorney's Fees and Costs, and Related Relief	AA2619-2636
11-12	05/03/2021	Exhibits in Support of Plaintiff's Motion for Protection Order Relating to Bradley's Discovery Requests and Subpoena's [sic], for An Award of Attorney's Fees and Costs, and Related Relief	AA2637-2759

12	05/06/2021	Motion to Remove S.C.R.A.M. Device	AA2760-2778
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
12	05/10/2021	Notice of Plaintiff's Filing her Opposition to Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2786-2788
12	05/11/2021	Court Minutes from Hearing May 11, 2021	AA2789-2790
12	05/11/2021	Transcripts from May 11, 2021, Hearing re: Return Hearing	AA2791-2807
12	05/11/2021	Order for Supervised Visitation	AA2808
12	05/11/2021	Order After Hearing	AA2809-2815
12	05/12/2021	Notice of Entry of Order After Hearing	AA2816-2825
12	05/12/2021	Notice of Disclosure of Receivers and Certified Public Accountants	AA2826-2828
12	05/13/2021	Notice of Therapist	AA2829-2831
12	05/14/2021	Opposition to Defendant's Motion for an Order to Show Cuse 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	AA2832-2851
12	05/14/2021	Exhibits in Support of Plaintiff's Opposition to Defendant's Motion for an Order to Show Cuse Why Plaintiff and Plaintiff's Counsel, Amanda Roberts, Esq., Should Not Be Held In	AA2852-2912

		Contempt of Court; and Countermotion for An Award of Attorney's Fees and Costs	
12	05/17/2021	Opposition to Defendant's Motion to Remove S.C.R.A.M. Device; and Countermotion to Drug Test Defendant, for an Award of Attorney's Fees and Costs, and Related Relief, Declaration of Emily Bellisario	AA2913-2934
12-13	05/17/2021	Exhibits in Support of Opposition to Defendant's Motion to Remove S.C.R.A.M. Device; and Countermotion to Drug Test Defendant, for an Award of Attorney's Fees and Costs, and Related Relief	AA2935-3003
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
13	05/17/2021	Opposition to Plaintiff's Notice of Motion and Motion for Protection Order Relating to Bradley's Discovery Requests and Subpoenas, for an Award of Attorney's Fees and Costs, and Related Relief	AA3014-3022
13	05/18/2021	Court Minutes From May 18, 2021	AA3023-3025
13	05/18/2021	Transcript from Hearing on May 18, 2021 re: All Pending Motions	AA3026-3069
13	05/18/2021	Motion for Order Pursuant to NRS 200.359 (Parental Kidnapping by Plaintiff)	AA3070-3115
13	05/19/2021	Information Regarding Therapy Provided By Anna Trujillo As Requested By Judge Marry Perry at Hearing on May 18, 2021	AA3116-3135
13	05/21/2021	Notice of Deposition—Emily Bellisario	AA3136-3137
13	06/02/2021	Opposition to Defendant's Motion for Order Pursuant to NRS 200.359 (Parental Kidnapping by Plaintiff); and Countermotion to Deem Defendant Vexatious Litigant and for an Award of Attorney's Fees and Costs	AA3138-3150

13	06/10/2021	Notice of Discovery Dispute Conference	AA3151-3153
13	06/11/2021	Amended Notice of Discovery Dispute Conference	AA3154-3156
13	06/16/2021	Court Minutes from June 16, 2021, Hearing at 10:00 a.m.	AA3157-3158
13	06/16/2021	Transcript re: Court Hearing on June 16, 2021, at 10:00 a.m. re: All Pending Motions	AA3159-3165
13	06/16/2021	Court Minutes from June 16, 2021, Hearing at	AA3166-3167
13		1:00 p.m.	
13	06/25/2021	Memorandum of Fees and Costs as Ordered	AA3168-3197
13	06/26/2021	Order After Hearing on June 16, 2021	AA3198-3204
13	06/26/2021	Order After Hearing on May 18, 2021	AA3205-3214
13	06/28/2021	Notice of Entry of Order After Hearing on June 16, 2021	AA3215-3224
13	06/28/2021	Notice of Entry of Order After Hearing on May 18, 2021	AA3225-3237
13-14	07/06/2021	Discovery Commissioner's Report and Recommendations	AA3238-3254
14	07/07/2021	Court Minutes from July 7, 2021	AA3255-3256
14	07/07/2021	Transcript re: Hearing on July 7, 2021 re: All Pending Motions	AA3257-3265
14	07/09/2021	Notice of Intentional Misrepresentations by Plaintiff and Amanda Roberts Regarding Dr. Stephanie Holland	AA3266-3275
14	07/12/2021	Minute Order from July 12, 2021	AA3276-3277
14	07/12/2021	Order Deeming Defendant a Vexatious Litigant	AA3278-3287
14	07/12/2021	Notice of Entry of Order Deeming Defendant a Vexatious Litigant	AA3288-3300
14	07/20/2021	Order After Hearing	AA3301-3307

14	07/22/2021	Notice of Entry of Order After Hearing	AA3308-3316
14	07/23/2021	Minute Order from July 23, 2021, re: Order on Discovery Commissioner Report and Recommendation	AA3317-3318
14	07/23/2021	Order on Discovery Commissioner's Report and Recommendations	AA3319-3338
14	09/02/2021	Discovery Commissioner's Report and Recommendations	AA3339-3351
14	09/16/2021	Court Minutes from September 16, 2021	AA3352-3353
14	09/16/2021	Transcript From September 16, 2021, Hearing re: Return Hearing	AA3354-3361
14	09/17/2021	Order After Hearing	AA3362-3368
14	09/20/2021	Order on Discovery Commissioner's Report and Recommendations	AA3369-3384
14	09/20/2021	Notice of Entry of Order After Hearing	AA3385-3394
14	09/22/2021	Notice of Entry of Order on Discovery Commissioner's Report and Recommendations	AA3395-3413
14	11/19/2021	Plaintiff's Pre-Trial Memorandum	AA3414-3437
14	11/19/2021	Plaintiff's Initial List of Witnesses	AA3438-3445
14	12/13/2021	Emily's Financial Disclosure Form	AA3446-3456
14	12/20/2021	Court Minutes From Non-Jury Trial on December 20, 2021	AA3457-3459
14	12/20/2021	Plaintiff's Trial Exhibit List with Exhibits Offered/Admitted/Denied/Objections	AA3460-3476
14	12/20/2021	Plaintiff's Exhibit 1	AA3477-3480
14	12/20/2021	Plaintiff's Exhibit 2	AA3481-3488
14	12/20/2021	Plaintiff's Exhibit 3	AA3489-3493

14	12/20/2021	Plaintiff's Exhibit 4	AA3494-3497
14-15	12/20/2021	Plaintiff's Exhibit 5	AA3498-3508
15	12/20/2021	Plaintiff's Exhibit 6	AA3509-3515
15	12/20/2021	Plaintiff's Exhibit 7	AA3516-3525
15	12/20/2021	Plaintiff's Exhibit 8	AA3526-3532
15	12/20/2021	Plaintiff's Exhibit 9	AA3533-3539
15	12/20/2021	Plaintiff's Exhibit 10	AA3540-3546
15	12/20/2021	Plaintiff's Exhibit 11	AA3547-3556
15	12/20/2021	Plaintiff's Exhibit 12	AA3557-3580
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
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
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
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)	
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
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)	
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
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
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
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
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
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
19-20	12/20/2021	Transcript From Non-Jury Trial on December 20, 2021	AA4618-4862
20	12/21/2021	Plaintiff's Notice of Filing Exhibits Under Seal Exhibit "124"	AA4863-4865
20	12/23/2021	Findings of Fact, Conclusions of Law, and Decree of Divorce	AA4866-4897
20	12/23/2021	Notice of Entry of Findings of Fact, Conclusions of Law, and Decree of Divorce	AA4898-4932
20	01/20/2022	Notice of Appeal	AA4933-4935
20	01/20/2022	Case Appeal Statement	AA4936-4940

INDEX OF APPELLANT'S APPENDIX
ALPHABETICAL ORDER

VOL.	DATE	PLEADING	BATES NO.
1	03/25/2020	Acceptance of Service	AA0141-142
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
13	06/11/2021	Amended Notice of Discovery Dispute Conference	AA3154-3156
10	04/22/2021	Amended Order After Hearing	AA2433-2440
1	04/09/2020	Answer and Counterclaim	AA0143-147
2	04/15/2020	Bradley Bellisario Financial Disclosure Form	AA0260-267
5	02/07/2021	Bradley Bellisario's Financial Disclosure Form	AA1034-1040
20	01/20/2022	Case Appeal Statement	AA4936-4940
3	01/11/2021	Certificate of Service	AA0584-586
8	03/02/2021	Certificate of Service	AA1753-1754
1	03/05/2020	Complaint for Divorce	AA0001-7
10	04/22/2021	Court Minutes from April 22, 2021	AA2431-2432
10	04/14/2021	Court Minutes from April 6, 2021	AA2380-2381
10	04/07/2021	Court Minutes from April 7, 2021	AA2271-2272
7	02/11/2021	Court Minutes from February 11, 2021	AA1542-1545
12	05/11/2021	Court Minutes from Hearing May 11, 2021	AA2789-2790
2	07/30/2020	Court Minutes from July 30, 2020, Hearing	AA0315-316
14	07/07/2021	Court Minutes from July 7, 2021	AA3255-3256

13	06/16/2021	Court Minutes from June 16, 2021, Hearing at 1:00 p.m.	AA3166-3167
13	06/16/2021	Court Minutes from June 16, 2021, Hearing at 10:00 a.m.	AA3157-3158
9	03/17/2021	Court Minutes from March 17, 2021	AA2052-2053
8	03/04/2021	Court Minutes from March 4, 2021	AA1798
13	05/18/2021	Court Minutes From May 18, 2021	AA3023-3025
14	12/20/2021	Court Minutes From Non-Jury Trial on December 20, 2021	AA3457-3459
2	11/24/2020	Court Minutes from November 24, 2020, Hearing	AA0325-326
2	10/22/2020	Court Minutes from October 22, 2020, Hearing	AA0321-324
14	09/16/2021	Court Minutes from September 16, 2021	AA3352-3353
4	01/25/2021	Court Minutes From Status Check on January 25, 2021	AA0856-858
8	03/09/2021	Decision and Order	AA1817-1823
9	03/22/2021	Decision and Order	AA2082-2084
4	01/20/2021	Decision and Order re: Peremptory Challenge	AA0827-829
8	03/09/2021	Defendant's Motion for Reconsideration Regarding Defendant's Motion to Disqualify Judge Mary Perry	AA1966-1979
10	04/08/2021	Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2318-2330
10	04/27/2021	Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2470-2478
9	04/06/2021	Discovery Commissioner's Report and Recommendations	AA2142-2149
13-14	07/06/2021	Discovery Commissioner's Report and Recommendations	AA3238-3254
14	09/02/2021	Discovery Commissioner's Report and Recommendations	AA3339-3351

1	03/09/2020	Emily Bellisario Financial Disclosure Form	AA0111-121
3	12/23/2020	Emily Bellisario Financial Disclosure Form	AA0556-566
14	12/13/2021	Emily's Financial Disclosure Form	AA3446-3456
1	03/13/2020	Errata to Motion for Primary Physical Custody, et al.	AA0122-126
1	03/13/2020	Ex Parte Application for Order Shortening Time	AA0127-140
5	02/05/2021	Ex Parte Application for Order Shortening Time	AA1022-1033
8	03/09/2021	Ex Parte Application for Order Shortening Time	AA1950-1961
8	03/11/2021	Ex Parte Application for Order Shortening Time	AA1989-1997
7	02/26/2021	Ex Parte Application for Order Shortening Time on Defendant's Motion to Disqualify Judge	AA1731-1739
9	04/05/2021	Ex Parte Motion for Continuance of Hearing Set for April 6, 2021, at 10:00 a.m.	AA2136-2141
5	02/09/2021	Ex Parte Motion for Continuance of Hearing Set for February 11, 2021, at 1:30 p.m.	AA1154-1204
11	05/02/2021	Ex Parte Motion for Return of Children	AA2568-2600
1	03/09/2020	Exhibit Appendix to Motion for Primary Physical Custody, et al.	AA0042-110
2	04/29/2020	Exhibit Appendix to Reply	AA0284-300
5	02/09/2021	Exhibits in Support of Motion to Compel	AA1073-1153
4-5	02/05/2021	Exhibits in Support of Motion to Extend Protection Order, et al.	AA0932-1003
8	03/09/2021	Exhibits in Support of Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce	AA1878-1949

		Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	
7	02/23/2021	Exhibits in Support of Opposition to Defendant's Motion to Disqualify, et al.	AA1721-1730
12-13	05/17/2021	Exhibits in Support of Opposition to Defendant's Motion to Remove S.C.R.A.M. Device; and Countermotion to Drug Test Defendant, for an Award of Attorney's Fees and Costs, and Related Relief	AA2935-3003
1	04/09/2020	Exhibits in Support of Opposition to Motion for Primary Physical Custody, et al.	AA0158-249
9	03/30/2021	Exhibits in Support of Opposition to Motion for Relief From Amended July 30, 2020 Order, et al.	AA2111-2120
7	02/23/2021	Exhibits in Support of Opposition to Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion et al.; and Countermotion for an Award of Attorney's Fees and Costs	AA1689-1703
11-12	05/03/2021	Exhibits in Support of Plaintiff's Motion for Protection Order Relating to Bradley's Discovery Requests and Subpoena's [sic], for An Award of Attorney's Fees and Costs, and Related Relief	AA2637-2759
10	04/22/2021	Exhibits in Support of 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	AA2401-2411
12	05/14/2021	Exhibits in Support of Plaintiff's Opposition to Defendant's Motion for an Order to Show Cuse Why Plaintiff and Plaintiff's Counsel, Amanda Roberts, Esq., Should Not Be Held In	AA2852-2912

		Contempt of Court; and Countermotion for An Award of Attorney's Fees and Costs	
10	04/22/2021	Exhibits in Support of Plaintiff's Opposition to Reconsider Order Against Domestic Violence Entered April 6, 2021; And Countermotion for An Award of Attorney's Fees and Costs	AA2425-2430
20	12/23/2021	Findings of Fact, Conclusions of Law, and Decree of Divorce	AA4866-4897
13	05/19/2021	Information Regarding Therapy Provided By Anna Trujillo As Requested By Judge Marry Perry at Hearing on May 18, 2021	AA3116-3135
10	04/14/2021	Memorandum of Attorney's Fees and Costs	AA2331-2379
13	06/25/2021	Memorandum of Fees and Costs as Ordered	AA3168-3197
14	07/12/2021	Minute Order from July 12, 2021	AA3276-3277
14	07/23/2021	Minute Order from July 23, 2021, re: Order on Discovery Commissioner Report and Recommendation	AA3317-3318
10	04/08/2021	Minute Order of April 8, 2021	AA2316-2317
5	02/09/2021	Minute Order of February 9, 2021	AA1045-1046
13	05/18/2021	Motion for Order Pursuant to NRS 200.359 (Parental Kidnapping by Plaintiff)	AA3070-3115
11	05/01/2021	Motion for Order to Show Cause Why Plaintiff and Plaintiff's Counsel, Amanda Roberts, Esq., Should Not Be Held in Contempt	AA2528-2567
1	03/09/2020	Motion for Primary Physical Custody, et al.	AA0008-41
9	03/16/2021	Motion for Protective Order	AA2003-2051
11	05/03/2021	Motion for Protective Order Relating to Bradley's Discovery Requests and Subpoena's [sic], for an Award of Attorney's Fees and Costs, and Related Relief	AA2619-2636

6-7	02/11/2021	Motion for Relief from Amended July 30, 2020, Order, July 30, 2020, Order, and October 22, 2020, Order	AA1444-1537
10	04/08/2021	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	AA2285-2315
3-4	01/11/2021	Motion for Relief from Order After Hearing Regarding Hearing on November 24, 2020	AA0596-811
5	02/09/2021	Motion to Compel Discovery, for Attorney's Fees and Costs, and Related Relief	AA1047-1072
6	02/11/2021	Motion to Disqualify Judge Pursant to NCJC 2.11	AA1352-1443
4	02/05/2021	Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA0888-931
8	03/09/2021	Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1834-1877
12	05/06/2021	Motion to Remove S.C.R.A.M. Device	AA2760-2778

2-3	12/10/2020	Motion to Show Cause Why Plaintiff and/or Plaintiff's Counsel Should Not Be Held in Contempt and Motion for Sanctions	AA0348-545
5-6	02/09/2021	Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion and Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1205-1271
3	01/11/2021	Motion to Strike Plaintiff's Peremptory Challenge	AA0587-595
20	01/20/2022	Notice of Appeal	AA4933-4935
9	03/22/2021	Notice of Defendant's Intent to File Write of Mandamus and Motion to Stay Proceedings	AA2085-2090
8	03/09/2021	Notice of Defendant's Intent to Seek Post-Order Relief	AA1962-1965
2	12/03/2020	Notice of Defendant's Non-Compliance with Court Order	AA0337-338
7	02/11/2021	Notice of Defendant's Objection to Judge Mary Perry Hearing Any Argument Related to Hearing Scheduled for February 11, 2021 at 1:30 p.m.	AA1538/-1541
10	04/23/2021	Notice of Defendant's Objection to Mary Perry Taking Any Further Action in This Matter	AA2452-2455
9	04/06/2021	Notice of Defendant's Objection to Order on Discovery Commissioner's Report and Recommendation	AA2162-2165

7	02/26/2021	Notice of Defendant's Objection to Plaintiff's Ex Parte Application for Order Shortening Time	AA1740-1744
8-9	03/12/2021	Notice of Defendant's Objection to Plaintiff's Ex Parte Application for Order Shortening Time Dated 03/11/2021	AA1998-2002
4	01/20/2021	Notice of Department Reassignment	AA0830-832
13	05/21/2021	Notice of Deposition—Emily Bellisario	AA3136-3137
12	05/12/2021	Notice of Disclosure of Receivers and Certified Public Accountants	AA2826-2828
3	12/16/2020	Notice of Discovery Dispute Conference	AA0553-555
10	04/26/2021	Notice of Discovery Dispute Conference	AA2456-2458
13	06/10/2021	Notice of Discovery Dispute Conference	AA3151-3153
10	04/26/2021	Notice of Entry of Amended Order After Hearing	AA2459-2469
8	03/09/2021	Notice of Entry of Decision and Order	AA1824-1833
20	12/23/2021	Notice of Entry of Findings of Fact, Conclusions of Law, and Decree of Divorce	AA4898-4932
8	03/10/2021	Notice of Entry of Order After Hearing	AA1983-1988
11	05/03/2021	Notice of Entry of Order After Hearing	AA2605-2618
12	05/12/2021	Notice of Entry of Order After Hearing	AA2816-2825
14	07/22/2021	Notice of Entry of Order After Hearing	AA3308-3316
14	09/20/2021	Notice of Entry of Order After Hearing	AA3385-3394
13	06/28/2021	Notice of Entry of Order After Hearing on June 16, 2021	AA3215-3224
13	06/28/2021	Notice of Entry of Order After Hearing on May 18, 2021	AA3225-3237
14	07/12/2021	Notice of Entry of Order Deeming Defendant a Vexatious Litigant	AA3288-3300

2	07/31/2020	Notice of Entry of Order for Supervised Visitation dated July 31, 2020	AA0318-320
9	04/06/2021	Notice of Entry of Order for Supervised Visitations	AA2170-2174
4	01/25/2021	Notice of Entry of Order From the July 30, 2020, Hearing	AA0864-874
3	12/11/2020	Notice of Entry of Order From the November 24, 2020, Hearing	AA0546-552
4	01/22/2021	Notice of Entry of Order From the October 22, 2020, Hearing	AA0840-847
14	09/22/2021	Notice of Entry of Order on Discovery Commissioner's Report and Recommendations	AA3395-3413
7-8	03/02/2021	Notice of Entry of Order Shortening Time	AA1748-1752
9	04/06/2021	Notice of Entry of Protection Order Against Domestic Violence	AA2166-2169
2	06/11/2020	Notice of Entry of Stipulation and Order dated June 11, 2020	AA0308-314
4	01/15/2021	Notice of Hearing and Order Regarding Procedures	AA0822-826
14	07/09/2021	Notice of Intentional Misrepresentations by Plaintiff and Amanda Roberts Regarding Dr. Stephanie Holland	AA3266-3275
12	05/10/2021	Notice of Plaintiff's Filing her Opposition to Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2786-2788
2	12/03/2020	Notice of Plaintiff's Non-Compliance with Court Order	AA0339-343
9	03/23/2021	Notice of Rescheduling Hearings	AA2091-2092
4	01/21/2021	Notice of Scheduling Status Check	AA0839
12	05/13/2021	Notice of Therapist	AA2829-2831
4	01/21/2021	Notice of Vacating Hearing	AA0838
11	05/03/2021	Objection to Defendant's Discovery Requests and Subpoenas	AA2601-2604

12	05/14/2021	Opposition to Defendant's Motion for an Order to Show Cuse 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	AA2832-2851
13	06/02/2021	Opposition to Defendant's Motion for Order Pursuant to NRS 200.359 (Parental Kidnapping by Plaintiff); and Countermotion to Deem Defendant Vexatious Litigant and for an Award of Attorney's Fees and Costs	AA3138-3150
9	03/30/2021	Opposition to Defendant's Motion for Relief From Amended July 30, 2020, Order, July 30, 2020, Order and October 22, 2020 Order; And Countermotion for An Award of Attorney's Fees and Costs	AA2093-2110
4	01/25/2021	Opposition to Defendant's Motion for Relief From Order After Hearing Regarding Hearing on November 24, 2020; And Countermotion for An Award of Attorney's Fees and Costs	AA0875-887
10	04/22/2021	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	AA2382-2400
7	02/23/2021	Opposition to Defendant's Motion to Disqualify Judge Pursuant to NCJC 2.11; and Countermotion for an Award of Attorney's Fees and Costs and Related Relief	AA1704-1720
10	04/22/2021	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	AA2412-2424
12	05/17/2021	Opposition to Defendant's Motion to Remove S.C.R.A.M. Device; and Countermotion to	AA2913-2934

		Drug Test Defendant, for an Award of Attorney's Fees and Costs, and Related Relief, Declaration of Emily Bellisario	
3	12/24/2020	Opposition to Defendant's Motion to Show Cause Why Plaintiff and/or Plaintiff's Counsel Should Not Be Held in Contempt and Motion for Sanctions; And Countermotion for an Award of Attorney's Fees and Costs	AA0567-581
4	01/13/2021	Opposition to Defendant's Motion to Strike Plaintiff's Peremptory Challenge; and Countermotion for and Award of Attorney's Fees and Costs	AA0812-821
1	04/09/2020	Opposition to Motion for Primary Physical Custody, et al.	AA0148-157
7	02/23/2021	Opposition to Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion et al.; and Countermotion for an Award of Attorney's Fees and Costs	AA1671-1688
9	03/17/2021	Opposition to Notice of Motion and Motion to Compel Discovery, for Attorney's Fees and Costs, and Related Relief	AA2054-2066
7	02/19/2021	Opposition to Plaintiff's Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1558-1661
13	05/17/2021	Opposition to Plaintiff's Notice of Motion and Motion for Protection Order Relating to Bradley's Discovery Requests and Subpoenas,	AA3014-3022

		for an Award of Attorney's Fees and Costs, and Related Relief	
7	02/16/2021	Order	AA1555-1557
8	03/10/2021	Order After Hearing	AA1980-19852
11	04/30/2021	Order After Hearing	AA2517-2527
12	05/11/2021	Order After Hearing	AA2809-2815
14	07/20/2021	Order After Hearing	AA3301-3307
14	09/17/2021	Order After Hearing	AA3362-3368
2	12/10/2020	Order After Hearing of November 24, 2020	AA0344-347
4	01/24/2021	Order After Hearing on July 30, 2020	AA0848-855
13	06/26/2021	Order After Hearing on June 16, 2021	AA3198-3204
13	06/26/2021	Order After Hearing on May 18, 2021	AA3205-3214
4	01/20/2021	Order After Hearing on October 22, 2020	AA0833-837
14	07/12/2021	Order Deeming Defendant a Vexatious Litigant	AA3278-3287
9	04/06/2021	Order for Supervised Visitation	AA2150
12	05/11/2021	Order for Supervised Visitation	AA2808
2	07/30/2020	Order for Supervised Visitation dated July 30, 2020	AA0317
9	04/06/2021	Order on Discovery Commissioner's Report and Recommendations	AA2151-2161
10	04/23/2021	Order on Discovery Commissioner's Report and Recommendations	AA2441-2451
14	07/23/2021	Order on Discovery Commissioner's Report and Recommendations	AA3319-3338
14	09/20/2021	Order on Discovery Commissioner's Report and Recommendations	AA3369-3384
1-2	04/13/2020	Order Setting Case Management Conference	AA0250-259
5	02/08/2021	Order Shortening Time	AA1041-1043

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 9 Part 1 as follows:

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

Amanda Roberts, Esq.
efile@lvfamilylaw.com

/s/ Crystal Beville
Crystal Beville

DECLARATION OF DEFENDANT BRADLEY BELLISARIO

I, Bradley Bellisario, declare and state as follows:

I, BRADLEY BELLISARIO, declare under penalty of perjury:

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

2. This Declaration is made in good faith and not made for the purpose of delay.

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

DATED this 12th day of March 2021.

/s/ Bradley Bellisario
Bradley Bellisario

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I AM THE DEFENDANT IN THE ABOVE-ENTITLED MATTER, AND ON THE 12TH DAY OF MARCH 2021, I SERVED BY AND THROUGH WIZ-NET ELECTRONIC SERVICE, PURSUANT TO CLARK COUNTY DISTRICT COURT ADMINISTRATIVE ORDER 14-2 FOR SERVICE OF DOCUMENTS IDENTIFIED IN RULE 9 OF THE N.E.F.C.R., THE FOREGOING **NOTICE OF DEFENDANT'S OBJECTION TO PLAINTIFF'S EX PARTE APPLICATION FOR ORDER SHORTENING TIME DATED 3-11-21**, TO THE FOLLOWING:

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

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

Electronically Filed
3/16/2021 1:13 PM
Steven D. Grierson
CLERK OF THE COURT

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

DISTRICT COURT

CLARK COUNTY, NEVADA

EMILY BELLISARIO, Plaintiff, vs. BRADLEY BELLISARIO, Defendant	Case No.: D-20-605263-D Dept No.: P **MOTION FOR PROTECTIVE ORDER** **HEARING REQUESTED**

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

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

1. For an Order protecting Defendant from abusive discovery actions by Plaintiff;
2. For an Order protecting Defendant and his former client's from Plaintiff's Subpoena requesting Defendant's IOLTA records;
3. For an Order Denying Plaintiff any further discovery requests until Plaintiff complies with NRCP 16.1;
4. For an Order granting Defendant all prior attorney's fees; and
5. For such other and further relief as the Court deems just and equitable.

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

DATED this 15th day of March 2021.

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

POINTS AND AUTHORITIES

I.
STATEMENT OF FACTS

On or around March 9, 2021 Plaintiff served Defendant with multiple Notices of Subpoena Duces Tecum regarding banking records for Nevada State Bank, Bank of Nevada, Wells Fargo, JP Morgan Chase and Bank of America. (*See Exhibit A).* Plaintiff is aware that she is not entitled to IOLTA account records as those accounts are trust accounts holding money owned by third-party beneficiaries that are entitled to attorney-client privilege. Additionally, Plaintiff previously requested banking records, correctly EXCLUDING IOLTA accounts. However, Plaintiff is now conducting herself in a blatantly illegal manner in this litigation and is attempting to get former client information solely for the purpose of harassing Defendant.

Additionally, Plaintiff has not complied with NRCP 26 and NRCP 16.2 requirements and is not entitled to begin discovery. A Motion for Sanctions is pending regarding Plaintiff's illegal conduct and unethical behavior regarding discovery.

Further, Plaintiff has conspired with the Clark County District Attorney's office to attempt to have Defendant arrested immediately prior to each of the last two (2) family court hearings set in this matter. Plaintiff's Counsel, Plaintiff, the County of Clark, and Clark County District Attorney Brianna Lamanna have all been sued regarding their intentional and illegal conduct. Today, the District Attorney's office is attempting to have Defendant taken into custody claiming no bail was paid in Case No. C-21-354165-1. However, bail was ordered transferred from 20-CR-039342. The Clark County District Attorney's office and EJDCR Dept 7 Clerk are erroneously claiming no bail was paid in 20-CR-039342, however, a simple review of Las Vegas Justice Court Case No. 20-PC-014512 ORDERS that bail transferred to 20-CR-039342 (A case Plaintiff, Plaintiff's Counsel, the County of Clark, and Brianna Lamanna are all being sued for malicious prosecution and abuse of process). Aladdin Bail stated that it is an "error" of the Court Clerk in Justice Court, however this was done on purpose to attempt to have Defendant taken in to custody to miss upcoming hearings in this matter, D-20-605263-D.

Plaintiff will undoubtedly ask for an Order Shortening Time in this matter, which should be denied as Plaintiff is merely attempting to deny Defendant Due Process is Defendant is taken into custody.

II.
LEGAL ARGUMENT

At any time **AFTER THE FILING OF A JOINT CASE CONFERENCE REPORT,** or not sooner than 14 days after a party has filed a separate case conference report, or upon order by the court or discovery commissioner, any party who has complied with Rule 16.1(a)(1), 16.2 or 16.205 may obtain discovery by any means permitted by these rules. NRCP 26(a). [Emphasis Added].

Parties may obtain discovery regarding any **NONPRIVILEGED** matter that is relevant to any party's claims or defenses and proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs it's likely benefit. NRCP 26(b)(1). [Emphasis Added].

On motion or on its own, the court must limit the frequency or extent of discovery otherwise allowed by these rules or by local rule if it determines that…the proposed discovery is outside the scope permitted by Rule 26(b)(1).

A party or any person from whom discovery is sought may move for a protective order in the court where the action is pending…The motion must include a certification that the movant has in good faith conferred or attempted to confer with other affected parties in an effort to resolve the dispute without court action. The court may, for good cause, issue an order to protect any person from annoyance, embarrassment, oppression, or undue burden or expense, including one or more of the following: (a) forbidding the disclosure or discovery; (b) specifying terms, including time and place or the allocation of expenses, for the disclosure or discovery; (c) prescribing a discovery method other than the one selected by the party seeking discovery; (d) forbidding inquiry into certain matters, or limiting the scope of disclosure or discovery to certain matters; (e) designating the persons who may be present while the discovery is conducted; (f) requiring that a deposition be sealed and opened only on court order; (g) requiring that a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only n a specified way; and (h) requiring that the parties simultaneously filed specified documents or information in sealed envelopes, to be opened as the court directs.

If a motion for a protective order is wholly or partially denied, the court may, on just terms, order that any party or person provide or permit discovery.

1. An Order for Protection Should be Entered Because Plaintiff Has Not Complied with NRCP 26

At any time **AFTER THE FILING OF A JOINT CASE CONFERENCE REPORT,** or not sooner than 14 days after a party has filed a separate case conference report, or upon order by the court or discovery commissioner, any party who has complied with Rule 16.1(a)(1), 16.2 or 16.205 may obtain discovery by any means permitted by these rules. NRCP 26(a). [Emphasis Added]. A Judicial district may make and amend rules governing practices therein…A local rule must be consistent with-bur not duplicate-these rules. NRCP 83(a)(1).

In this matter, no Case Conference Report has ever been filed, nor has a scheduling Order ever been filed, nor has Plaintiff complied with NRCP 16.2. It is Plaintiff's responsibility to ensure the filing of a case management conference. Plaintiff should not benefit from her own willful disobedience of court rules. As such, Plaintiff's subpoenas should be disallowed in total as no discovery is permitted at this time.

2. An Order for Protection Should be Entered Because Plaintiff is Requesting Privileged Information.

Plaintiff served notice of multiple Subpoena Duces Tecum for financial accounts, including IOLTA accounts held by Bellisario Law, L.L.C. and Bellisario Law P.C. Plaintiff previously requested banking records, specifically EXCLUDING IOLTA account information. However, now Plaintiff and her Counsel are displaying a true extent of their narcissism by filing knowingly fraudulent documents, intentionally depriving defendant of due process, and now attempting to obtain privileged information with the sole purpose of harassing Defendant's former clients.

"Bank accounts may be in the name of a sole account holder or they may be in the name of joint account holders. Under traditional principles of banking law, the form of the account, and the name it may bear, may have little to do with the beneficial ownership of anything deposited into the account." *Natko v. State*, 435 P.3d 680, 687 (Nev. App. 2018). "By way of example, trust accounts-such as an attorney trust account holding money for clients, or any other type of trust account used by agents or fiduciaries to hold money on behalf of principals-are classic examples of bank accounts that may bear the name of one person or entity but actually hold money beneficially owned by other people whose names appear nowhere on the accounts." *Id.* IOLTA accounts are the private property of the owner of the principal. *Moldon v. County of Clark*, 124 Nev. 507, 512 n.13 (Nev. 2008).

A client has a privilege to refuse to disclose, and to prevent any other person from disclosing, confidential communications. NRS 49.095. The privilege may be claimed by the person who was the lawyer at the time of the communication. NRS 49.105. The person's authority to do so is presumed in the absence of evidence to the contrary. *Id.*

Jurisdictions with statutory attorney-client privileges like Nevada have overwhelmingly refused to adopt a fiduciary exception by judicial decree. No statutory or common law exception to privilege exists allowing Plaintiff to subpoena Defendant's IOLTA accounts.

Clearly, Plaintiff has submitted Subpoenas requesting IOLTA account information. Said accounts are owned by third-party beneficiaries, not Defendant. However, Defendant was counsel for said third-parties at all times relevant in the subpoena requests and invokes attorney-client privilege on behalf of the third parties to keep said parties free of harassment and embarrassment by Plaintiff and her Counsel's non-stop illegal and unethical conduct.

3. An Order for Protection Should be Entered Because Plaintiff's Requested IOLTA Information is Not Relevant.

Parties may obtain discovery regarding any nonprivileged matter that is **RELEVANT** to any party's claims or defenses and proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs it's likely benefit. NRCP 26(b)(1). [Emphasis Added]. IOLTA accounts are the private property of the owner of the principal. *Moldon v. County of Clark*, 124 Nev. 507, 512 n.13 (Nev. 2008).

Here, Plaintiff is requesting IOLTA records from Bellisario Law, L.L.C. and Bellisario Law, P.C., both of which are legal entities previously owned by Defendant. However, at this time the legal entities are dissolved, and Defendant is not employed by either business. Moreover, the trust accounts are simply for holding money which is OWNED BY CLIENTS, not Defendant. As such, the accounts are irrelevant to this matter. Plaintiff is merely attempting to harass Defendant, and Defendant's former clients. Plaintiff's multiple Subpoena Duces Tecum are not made in good faith, and this Honorable Court should enter a protective order preventing Plaintiff from seeking irrelevant banking information that would violate the attorney-client privilege of Defendant's former clients.

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III.
CONCLUSION

This Honorable Court should enter an Order disallowing Plaintiff from conducting discovery and the requested subpoenas as Plaintiff has not complied with NRCP 26, Plaintiff is requesting privileged information, and Plaintiff's discovery requests are irrelevant.

DATED this 16th day of March 2021.

/s/ Bradley Bellisario

Bradley Bellisario
7100 Grand Montecito Pkwy, #2054
Las Vegas, NV 89149
T: 702.936.4800
F: 702.936.4801
E: bradb@bellisariolaw.com
Defendant Pro Se

DECLARATION OF BRADLEY J. BELLISARIO

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

1. I am the Defendant in the above entitled matter;
2. That I read the foregoing MOTION FOR PROTECTIVE ORDER, 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.

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

DATED this 16th day of March 2021.

Bradley J. Bellisario *Defendant Pro Se*

CERTIFICATE OF SERVICE

I hereby certify that I am Defendant in the above-entitled matter, and on the 16th day of March 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 MOTION FOR PROTECTIVE ORDER to:

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

By: _____
Bradley Bellisario, *Defendant*

EXHIBIT A

NOTC
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
Attorney 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 **NOTICE OF SUBPOENA DUCES TECUM**

PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena will be served upon Nevada State Bank, 112 North Curry Street,

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Carson City, Nevada, on March 17, 2021, if you have not objected and sought issuance of a protective order. A copy of the proposed Subpoena is attached hereto and fully incorporated herein by reference.

DATED this 9th day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

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

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, and on the 9 day of March, 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 **NOTICE OF SUBPOENA DUCES TECUM (with Subpoena attached)**, to the following:

Bradley Bellisario
Email: bradb@bellisariolaw.com
Defendant

By: _____
Employee of Roberts Stoffel Family Law Group

SUBP
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
Attorney 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))) **SUBPOENA DUCES TECUM**))))))	

THE STATE OF NEVADA SENDS GREETING TO:

Custodian of Records
Nevada State Bank
Attn: Subpoena Compliance Department
112 North Curry Street
Carson City, Nevada 89703

YOU ARE HEREBY COMMANDED that all and singular business and excuses set aside to furnish any and all items set forth in the attached **Exhibit "A"**

within this Subpoena on the 1st day of April, 2021, at the hour of 12:00 p.m., at the law offices of Roberts Stoffel Family Law Group, located at 4411 S. Pecos Road, Las Vegas, Nevada, 89121. In the event the requested documents are produced on or before the 1st day of April, 2021, together with an Affidavit of the Custodian of Records (*please contact the office at efile@lvfamilylaw.com if an Affidavit is needed*) then your attendance is not required.

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

Dated this 9th day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

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

EXHIBIT "A"
LIST OF DOCUMENTS TO BE PRODUCED

1. A copy of any and all account records, statements, applications, memorandums, notices, etc. for checking, savings, money market, 401k, lines of credit, credit card, etc., for Bradley John Bellisario (DOB: 11/01/1985; SSN: 215-19-0604) whether head individually or jointly, whether currently open or closed, for the period of August 16, 2014 to present.

2. A copy of any and all account records, statements, applications, memorandums, notices, etc. for checking, savings, money market, 401k, lines of credit, credit card, IOLTA account, etc., for Bellisario Law and/or Bellisario Law, P.C., from December 15, 2014 to present.

EXHIBIT "B"
***NRCP* § 45**

(c) Protection of Persons Subject to Subpoena.

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

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

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

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

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may

in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

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

(iv) subjects a person to undue burden.

(B) If a subpoena

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

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party,

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

[As amended; effective January 1, 2005.]

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[As amended; effective January 1, 2005.]

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

ELECTRONICALLY SERVED
3/9/2021 4:35 PM

NOTC
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
Attorney 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 **NOTICE OF SUBPOENA DUCES TECUM**

PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena will be served upon Bank of Nevada, One E. Washington St., Suite 1400,

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Phoenix, Arizona 85004, if you have not objected and sought issuance of a protective order. A copy of the proposed Subpoena is attached hereto and fully incorporated herein by reference.

DATED this 9th day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

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

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, and on the 9 day of March, 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 **NOTICE OF SUBPOENA DUCES TECUM (with Subpoena attached)**, to the following:

Bradley Bellisario
Email: bradb@bellisariolaw.com
Defendant

By: C O'Brien
Employee of Roberts Stoffel Family Law Group

SUBP
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
Attorney 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))) **SUBPOENA DUCES TECUM**)))))))	

THE STATE OF NEVADA SENDS GREETING TO:

Custodian of Records
Bank of Nevada
Attn: Subpoena Compliance Department
One E. Washington St., Suite 1400
Phoenix, Arizona 85004

YOU ARE HEREBY COMMANDED that all and singular business and excuses set aside to furnish any and all items set forth in the attached **Exhibit "A"**

within this Subpoena on the 1st day of April, 2021, at the hour of 11:30 a.m., at the law offices of Roberts Stoffel Family Law Group, located at 4411 S. Pecos Road, Las Vegas, Nevada, 89121. In the event the requested documents are produced on or before the 1st day of April, 2021, together with an Affidavit of the Custodian of Records (*please contact the office at efile@lvfamilylaw.com if an Affidavit is needed*) then your attendance is not required.

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

Dated this 9th day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

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

EXHIBIT "A"
LIST OF DOCUMENTS TO BE PRODUCED

1. A copy of any and all account records, statements, applications, memorandums, notices, etc. for checking, savings, money market, 401k, lines of credit, credit card, etc., for Bradley John Bellisario (DOB: 11/01/1985; SSN: 215-19-0604) whether head individually or jointly, whether currently open or closed, for the period of August 16, 2014 to present.

2. A copy of any and all account records, statements, applications, memorandums, notices, etc. for checking, savings, money market, 401k, lines of credit, credit card, IOLTA account, etc., for Bellisario Law and/or Bellisario Law, P.C., from December 15, 2014 to present.

EXHIBIT "B"
***NRCP* § 45**

(c) Protection of Persons Subject to Subpoena.

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

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

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

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

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may

in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

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

(iv) subjects a person to undue burden.

(B) If a subpoena

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

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party,

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

[As amended; effective January 1, 2005.]

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

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

[As amended; effective January 1, 2005.]

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

NOTC
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
Attorney 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 **NOTICE OF SUBPOENA DUCES TECUM**

PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena will be served upon Bank of America, 300 S. 4th Street, Las Vegas,

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Nevada, 89101, on March 17, 2021, if you have not objected and sought issuance of a protective order. A copy of the proposed Subpoena is attached hereto and fully incorporated herein by reference.

DATED this 9th day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

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

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, and on the 9th day of March, 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 **NOTICE OF SUBPOENA DUCES TECUM (with Subpoena attached)**, to the following:

Bradley Bellisario
Email: bradb@bellisariolaw.com
Defendant

By: Amanda M. Richards
Employee of Roberts Stoffel Family Law Group

SUBP
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
Attorney 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))) **SUBPOENA DUCES TECUM**))))))	

THE STATE OF NEVADA SENDS GREETING TO:

Custodian of Records
Bank of America
Attn: Subpoena Compliance Department
300 South 4th Street
Las Vegas, Nevada 89101

YOU ARE HEREBY COMMANDED that all and singular business and excuses set aside to furnish any and all items set forth in the attached **Exhibit "A"**

within this Subpoena on the 1st day of April, 2021, at the hour of 11:00 a.m., at the law offices of Roberts Stoffel Family Law Group, located at 4411 S. Pecos Road, Las Vegas, Nevada, 89121. In the event the requested documents are produced on or before the 1st day of April, 2021, together with an Affidavit of the Custodian of Records (*please contact the office at efile@lvfamilylaw.com if an Affidavit is needed*) then your attendance is not required.

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

Dated this 9th day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

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

EXHIBIT "A"
LIST OF DOCUMENTS TO BE PRODUCED

1. A copy of any and all account records, statements, applications, memorandums, notices, etc. for checking, savings, money market, 401k, lines of credit, credit card, etc., for Bradley John Bellisario (DOB: 11/01/1985; SSN: 215-19-0604) whether head individually or jointly, whether currently open or closed, for the period of August 16, 2014 to present.

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EXHIBIT "B"
***NRCP* § 45**

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

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

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

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may

in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

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[As amended; effective January 1, 2005.]

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[As amended; effective January 1, 2005.]

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

SUBP
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
Attorney 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 **SUBPOENA DUCES TECUM**

THE STATE OF NEVADA SENDS GREETING TO:

Custodian of Records
Wells Fargo Bank, N.A.
Attn: Subpoena Compliance Department
3800 Howard Hughes Parkway
Las Vegas, Nevada 89169

YOU ARE HEREBY COMMANDED that all and singular business and excuses set aside to furnish any and all items set forth in the attached **Exhibit "A"**

within this Subpoena on the 1st day of April, 2021, at the hour of 10:00 a.m., at the law offices of Roberts Stoffel Family Law Group, located at 4411 S. Pecos Road, Las Vegas, Nevada, 89121. In the event the requested documents are produced on or before the 1st day of April, 2021, together with an Affidavit of the Custodian of Records (*please contact the office at efile@lvfamilylaw.com if an Affidavit is needed*) then your attendance is not required.

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

Dated this 9th day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

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

EXHIBIT "A"
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[As amended; effective January 1, 2005.]

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NOTC
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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
Attorney 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 **NOTICE OF SUBPOENA DUCES TECUM**

PLEASE TAKE NOTICE that pursuant to NRCP § 45 (a)(4)(A) the attached Subpoena will be served upon JPMorgan Chase, N.A., 2865 E. Charleston Blvd.,

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Las Vegas, Nevada, 89104, on March 17, 2021, if you have not objected and sought issuance of a protective order. A copy of the proposed Subpoena is attached hereto and fully incorporated herein by reference.

DATED this 9th day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

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

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, and on the 9th day of March, 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 **NOTICE OF SUBPOENA DUCES TECUM (with Subpoena attached)**, to the following:

Bradley Bellisario
Email: bradb@bellisariolaw.com
Defendant

By: Amanda M. Roberts
Employee of Roberts Stoffel Family Law Group

SUBT
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
Attorney 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))) **SUBPOENA DUCES TECUM**)))	

THE STATE OF NEVADA SENDS GREETING TO:

Custodian of Records
JPMorgan Chase Bank, N.A.
Attn: Subpoena Compliance Department
2865 E. Charleston Blvd.
Las Vegas, Nevada 89104

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YOU ARE HEREBY COMMANDED that all and singular business and excuses set aside to furnish any and all items set forth in the attached **Exhibit "A"** within this Subpoena on the 1st day of April, 2021, at the hour of 10:30 a.m., at the law offices of Roberts Stoffel Family Law Group, located at 4411 S. Pecos Road, Las Vegas, Nevada, 89121. In the event the requested documents are produced on or before the 1st of April, 2021, together with an Affidavit of the Custodian of Records (*please contact the office at efile@lvfamilylaw.com if an Affidavit is needed*) then your attendance is not required.

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

Dated this 9th day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

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

EXHIBIT "A"
LIST OF DOCUMENTS TO BE PRODUCED

1. A copy of any and all account records, statements, applications, memorandums, notices, etc. for checking, savings, money market, 401k, lines of credit, credit card, etc., for Bradley John Bellisario (DOB: 11/01/1985; SSN: 215-19-0604) whether head individually or jointly, whether currently open or closed, for the period of August 16, 2014 to present.

2. A copy of any and all account records, statements, applications, memorandums, notices, etc. for checking, savings, money market, 401k, lines of credit, credit card, IOLTA account, etc., for Bellisario Law and/or Bellisario Law, P.C., from December 15, 2014 to present.

EXHIBIT "B"
***NRCP* § 45**

(c) Protection of Persons Subject to Subpoena.

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

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

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

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

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may

in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

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

(iv) subjects a person to undue burden.

(B) If a subpoena

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

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party,

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

[As amended; effective January 1, 2005.]

(d) Duties in Responding to Subpoena.

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

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

[As amended; effective January 1, 2005.]

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

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

March 17, 2021 01:00 PM Motion

HEARD BY: Young, Jay **COURTROOM:** Courtroom 20

COURT CLERK: Cunningham, Michelle; Varona, Leo

PARTIES PRESENT:

Emily Bellisario, Counter Defendant, Plaintiff, Not 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

PLAINTIFF'S NOTICE OF MOTION AND MOTION TO COMPEL DISCOVERY, AND FOR ATTORNEY'S FEES AND COSTS, AND RELATED RELIEF

COURT CLERKS: Michelle Cunningham, Leo Varona

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

COURT NOTED there was no opposition on file. Upon Court's Inquiry Defendant confirmed he filed his Opposition this morning and that Plaintiff, Attorney Roberts and some other District Attorney (DA) had him arrested yesterday. Upon Court's inquiry, Attorney Roberts stated she has not reviewed the Opposition but another associate in her office reviewed it. Attorney Roberts represented that she had electronically served Defendant and that he had opened it on 02/09/2021. Court represented he has not seen the Opposition and is not going to read it today but the court will let Defendant make a record.

Court addressed the affidavit filed by counsel regarding the Meet and Confer and stated it does not find that type of an Affidavit is sufficient to meet the requirements for the EDCR Rule 5.602 and for future affidavits to include all efforts made for the Meet and Confer. The Court will accept it at this time.

Court addressed the Motion and stated the Request for Production and Interrogatories were sent out on 06/10/2020, On 10/22/2020 Court ordered Defendant to deliver his financial books and records, On 11/24/2020 an Order was given to again deliver financial records within seven (7) days at that date and that failure would result in the Court would recommend and unequal distribution. COURT

Notice: Journal Entries are prepared by the courtroom clerk and are not the official record of the Court.

NOTED, to date, none of the requests have been responded to and no 16.2 disclosures have been made. Upon Court's inquiry, Attorney Roberts confirmed this. Upon the Court's inquiry, Defendant stated that it was partially true, he had prior counsel and he does not know what prior counsel responded to. Further Discussion regarding Defendant responding to the requests. Defendant confirmed he had not responded since Defendant and counsel had parted ways. Attorney Roberts further stated an additional letter sent to Defendant on 01/11/2021 regarding additional discovery.

Defendant addressed the history of this case in regards to scheduling orders and discovery.

Following discussions and arguments, COMMISSIONER made its FINDINGS and RECOMMENDED, the following:

1. Pursuant to rule 5.503 the Court finds Defendant is deemed, by reason of his failure to oppose the Motion timely, to have admitted that is has merit and that the motion has merit on its own.

2. All Objections to the Interrogatories and Request for Production of Documents are WAIVED by operation of Rule all requests are DEEMED ADMITTED. Defendant shall have 5 days to respond to the Interrogatories and the Request for Production of Documents.

3. Defendant shall respond to the first set of Request for Production of Documents within 5 days of today's date.

4. Defendant shall be PRECLUDED from presenting or relying on at trial or evidentiary hearing any evidence required by Rule 16.2 not disclosed as of 5 days from today.

5. An ADVERSE INFERENCE will be declared that any evidence withheld after five (5) days from today would NOT support the Defendant's position.

6. Preliminarily,The Request for ATTORNEY'S FEES under rule 37a5 shall be GRANTED. Attorney Roberts shall submit a Request for Itemized billing, plus a Declaration with the Brunzell factors, only including the fees that are related to this discovery dispute.

7. STATUS CHECK re: Submission of Report and Recommendations, Attorney's Fees, and a Determination of Plaintiff's compliance shall be SET for 04/07/2021 at 1:30 p.m. If Plaintiff has not complied, the Court will consider the precluding order in the Adverse Inference Order that the Court indicated earlier.

Attorney Roberts shall prepare the Report and Recommendation (R&R) and Defendant to sign as to form and content. If the R&R has not been submitted within the next fourteen (14) days, Attorney Roberts shall be subject to contribution for failure to submit. Defendant shall have forty (48) hours to respond or object. If Defendant does not respond with 48 hours, Attorney Roberts may submit the R&R without his signature.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Apr 15, 2021 11:00AM Motion
Courtroom 23 Perry, Mary

Apr 28, 2021 10:00AM Motion
Courtroom 23 Perry, Mary

Notice: Journal Entries are prepared by the courtroom clerk and are not the official record of the Court.

Electronically Filed
3/17/2021 11:43 AM
Steven D. Grierson
CLERK OF THE COURT

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

DISTRICT COURT

CLARK COUNTY, NEVADA

EMILY BELLISARIO, Plaintiff, vs. BRADLEY BELLISARIO, Defendant	Case No.: D-20-605263-D Dept No.: P **OPPOSITION TO NOTICE OF MOTION AND MOTION TO COMPEL DISCOVERY, FOR ATTORNEY'S FEES AND COSTS, AND RELATED RELIEF**

COMES NOW, Defendant *Pro Se*, Bradley J. Bellisario, and hereby submits the following OPPOSITION TO NOTICE OF MOATION AND MOTION TO COMPEL DISCOVERY, FOR ATTORNEY'S FEES AND COSTS, AND RELATED RELIEF. The foregoing is submitted in good faith and not for purposes of delay.

POINTS AND AUTHORITIES

I.
STATEMENT OF FACTS

This case is a highly contested divorce and custody matter. The Complaint was filed by Plaintiff on or around March 5, 2020. On March 9, 2020 Plaintiff, without having served Defendant with a Complaint and Summons, filed a Motion for Primary Physical Custody of the

Minor Children, for Child Support & Health Insurance Coverage; for an Outsourced Alcohol/Psychological Evaluation of the Defendant; to Confirm and Consolidate the Temporary Protective Order; for Spousal Support; and for Plaintiff's Attorney's Fees and Costs Incurred Herein. Plaintiff's Motion was filled with intentional misrepresentations of material fact, and contained fraudulent evidence known to Plaintiff's previous Counsel (Boris Avramski) to be fraudulent. On March 9, 2020 Plaintiff also filed a Financial Disclosure Form and claimed to have served Defendant via mail service, however, mail service is not permitted before serving Defendant with the Complaint and Summons. In any event Defendant never received Plaintiff's financial Disclosure Form by Mail. After months of requesting Plaintiff's FDF from her previous Counsel, the Court finally sent FDF to Defendant's Counsel and Defendant immediately realized why Plaintiff's Counsel refused to send the document. Plaintiff blatantly lied and committed fraud upon the Court claiming that she was employed and had been employed throughout the duration of the marriage. Plaintiff even attached fraudulent documents from her Father's business as "proof" of her employment.

The Complaint and Summons was finally served upon Defendant on March 25, 2020 by Counsel for Defendant accepting service of process at this office. On April 13, 2020 the "Honorable" Judge Pomrenze filed an Order Setting Case Management Conference and Directing Compliance with NRCP 16.2.

On May 5, 2020 Plaintiff's current Counsel, Amanda Roberts, filed a Substitution of Attorney and was officially record of Counsel. Plaintiff fired her previous Counsel as they informed her this would be a joint custody case, and Amanda Roberts gladly offered to commit fraud to unethically try and change that for Plaintiff. Shortly after her substitution Amanda Roberts began committing fraud. Amanda Roberts negotiated a Stipulation and Order which was

filed on June 10, 2020 and a Notice of Entry of Order was filed June 11, 2020. During later proceedings Ms. Roberts admitted to facts constituting fraud regarding the Stipulation and Order entered on June 11, 2020. Ms. Roberts has since been sued by Defendant for fraud regarding said Stipulation and Order which constitutes a contract.

The parties had hearings on July 30, 2020, October 22, 2020 November 24 2020 and February 11, 2020. Ms. Roberts was instructed to prepare Orders from all hearings. However, Ms. Roberts chose to violate numerous professional codes of conduct and commit fraud upon this Court by intentionally failing to produce and file Orders regarding said hearings. When Ms. Roberts did finally produce Orders, said Orders contained multiple instances of intentional misrepresentation of material fact. Further Ms. Roberts failed to produce and pass the Orders to opposing Counsel/Defendant in accordance with Eighth Judicial District Court Rules. Ms. Roberts did so because she knew the fraudulent nature of her Orders, and additionally, Defendant had no recourse or due process to challenge the Judge's rulings or hold her client in contempt for numerous willful violations of said Orders where Plaintiff illegally, maliciously, and with intent to mentally injure Defendant and the minor children, withheld the minor children without any legally sufficient explanation. Ms. Roberts has aided and abetted her client in committing the crime of parental kidnapping, and intentionally alienating the children from Defendant.

On or around June 2020 Defendant was informed of discovery requests propounded by Plaintiff. Defendant gave his Counsel at the time all case related material. Defendant was represented until November 24, 2020 when Counsel for Defendant, Christopher Tillman was allowed to withdraw from representation. Since that time Defendant has requested all discovery from Plaintiff so that Defendant could answer what needed to be done. Defendant received no answer from Plaintiff.

Since that time Plaintiff and her Counsel have continued to violate Court rules and commit crimes. On January 23, 2021 Plaintiff and Plaintiff's Counsel Conspired to have Defendant wrongfully arrested in front of the minor children. Defendant was arrested and detained for ten (10) days before being released. Plaintiff and her Counsel did this because the parties' had a hearing with the newly assigned Judge Mary Perry, Amanda Roberts' close personal friend, on January 25, 2021. Judge Perry, Amanda Roberts' close personal friend, initiated and allowed an ex parte hearing in which Amanda Roberts made numerous intentional misrepresentations of material fact, and Judge Perry claimed to make her decisions on said representations. Ms. Roberts was Ordered to prepare an Order from that hearing. Ms. Roberts once again violated Eight Judicial District Court Rules and failed to prepare and Order and pass it along to Defendant. Instead, over a month later Ms. Roberts prepared an Order clearly misrepresenting the contents of the hearing (to cover herself and Judge Perry) and filed the same with the court without passing to Defendant. Additionally, Amanda Roberts failed to file Orders from the July 30, 2020 and October 22, 2020 hearings until the day after Defendant was wrongfully arrested. A full 179 days after the July 30, 2020 hearing. Plaintiff then contacted the Clark County District Attorney claiming she wanted Defendant to stay incarcerated, and as such, Defendant had to wait in CCDC for an ankle monitor to illegally be placed on house arrest. The result is that Plaintiff's Counsel was able to file the Orders and deprive Defendant of due process (an inherent right) and cause Defendant's time to file for relief or rehearing to run. Amanda Roberts has not filed one (1) Order correctly, and has violated Defendant's due process at every turn, so affecting this litigation that Defendant has in essence been deprived of all rights.

After the ex-parte hearing on January 25, 2021 in which Judge Perry egregiously told Amanda Roberts to file a motion with an order shortening time and they'd "get it done real quick."

Amanda Roberts filed a forty-four (44) page motion regarding multiple claims, most importantly modification of physical and legal custody, despite no substantial change in circumstances. Upon release from CCDC Defendant was served with an Order Shortening Time while waiting for Court on a Monday morning. To Defendant's disbelief the Order Shortened the Time for Defendant to Respond to the 44 page Motion to one (1) day as the hearing was on that upcoming Wednesday. Apparently, later that day Plaintiff also filed her Motion to Compel which was overlooked by Defendant as Plaintiff had filed her 44 page motion, which was given an Order Shortening Time (based upon fraudulent misrepresentation of material fact to the court, and Amanda's inappropriate relationship with Judge Mary Perry leading to actual bias and the appearance of impropriety). On February 11, Defendant filed a Motion to Disqualify Judge Perry and on February 11, 2021 Judge Perry stated during hearing that ALL Motions would be taken off calendar and need to be re-noticed. Defendant therefore had the reasonable assumption that Plaintiff's Motion to Compel would also need to be re-noticed.

Once again, as Defendant was set to prepare and file multiple filings which would affect this family court hearing, Plaintiff and Plaintiff's Counsel diligently applied themselves in an attempt to have Defendant wrongfully incarcerated. Plaintiff had testified to a grand jury weeks prior, and Defendant was arraigned on a charge in District Court a week prior to this Opposition. Nearly a week after the arraignment, Judge Bell's office mysteriously now claimed that Defendant would need to post another bail in said matter (although Defendant had already posted bail) as Judge Bell's office claimed no bail had been paid. This is after Judge Bell's office, upon information and belief, had ex-parte communications with Plaintiff's Counsel in this divorce matter a week prior. Plaintiff's Counsel had yet again concocted a plan to have Defendant incarcerated immediately prior to the family court hearing so she could yet again conduct an ex

parte hearing And deprive Defendant of due process. However, Defendant was able to prove to LVMPD that Judge Bell's office was incorrect, and Defendant was thankfully released in time to provide this court with an opposition on the record. Defendant was however forced to attend to the matter from 8:30 am to 7:15 pm, and was detained in LVMPD custody from 2 pm until 7pm, forcing Defendant to have no means to file any intended relief sought which would have affected this hearing.

II.
LEGAL ARGUMENT

At any time **AFTER THE FILING OF A JOINT CASE CONFERENCE REPORT,** or not sooner than 14 days after a party has filed a separate case conference report, or upon order by the court or discovery commissioner, any party who has complied with Rule 16.1(a)(1), 16.2 or 16.205 may obtain discovery by any means permitted by these rules. NRCP 26(a). [Emphasis Added].

1. An Order for Protection Should be Entered Because Plaintiff Has Not Complied with NRCP 26

At any time **AFTER THE FILING OF A JOINT CASE CONFERENCE REPORT,** or not sooner than 14 days after a party has filed a separate case conference report, or upon order by the court or discovery commissioner, any party who has complied with Rule 16.1(a)(1), 16.2 or 16.205 may obtain discovery by any means permitted by these rules. NRCP 26(a). [Emphasis Added]. A Judicial district may make and amend rules governing practices therein…A local rule must be consistent with-bur not duplicate-these rules. NRCP 83(a)(1).

In this matter, no Case Conference Report has ever been filed, nor has a scheduling Order ever been filed, nor has Plaintiff complied with NRCP 16.2. It is Plaintiff's responsibility to

ensure the filing of a case management conference. Plaintiff should not benefit from her own willful disobedience of court rules. As such, Plaintiff's requested relief should be denied in total as no discovery is permitted at this time.

2. The Doctrine of Unclean Hands Bars any Relief Sought by Plaintiff.

The unclean hands doctrine generally bars a party from receiving relief because of that party's own inequitable conduct. The Doctrine precludes a party from attaining equitable relief when that party's connection with the subject-matter or transaction in litigation has been unconscientious, unjust, or marked by the want of good faith." *Las Vegas Fetish Fantasy v. Ahern Rentals*, 124 Nev. 272, 275 (Nev. 2008).

In this matter Plaintiff and her Counsel have proceeded in an illegal and unethical manner from the instant Amanda Roberts substituted as Counsel. On June 10, 2020 and immediately prior, Amanda Roberts committed fraud, and has been sued. Ms. Roberts has additionally been sued as a co-defendant in a separate case regarding the wrongful arrest as a result of her conduct and that of Plaintiff. Ms. Roberts even stated in the November 24, 2020 hearing that the claims from the fraud lawsuit arise from this matter, and claims that the lawsuit for malicious prosecution against Plaintiff should be consolidated in this matter along with the lawsuit against Ms. Roberts. Ms. Roberts is admitting they should be codefendants. As such she should not even be allowed as counsel on this matter.

Additionally, Ms. Roberts has intentionally violated Eighth Judicial District Court Rules and violated numerous Rules of Professional Conduct by failing to prepare orders, failing to pass orders to opposing party, filling the orders with intentional misrepresentations of material fact, and depriving Defendant of due process, an inherent right in Custody proceedings. Plaintiff and

Plaintiff's Counsel have likewise unethically and illegally conspired to commit the commit crimes including but not limited to; parental kidnapping, submitting false statements to police, malicious prosecution, abuse of process, and perjury. All of which have cost Defendant hundreds of hours to combat just to attempt to climb back to a level playing field.

Additionally, Plaintiff is responsible for initiating and conducting a Joint Case Conference and filing a Joint Case Conference Report. To date, no Joint Case Conference Report has ever been prepared or filed. Likewise, when Defendant requested from Plaintiff what discovery has been done, Defendant received no response allowing Defendant to have any reasonable opportunity to collect documents or prepare non-duplicative responses.

To date multiple Motions remain to be heard which would affect discovery in this matter. Namely Defendant has filed a Motion for Sanctions for multiple reasons, including many of which have been described in the description of Plaintiff's unclean hands and failure to comply with NRCP 16.2 as Plaintiff filed false documents and failed herself to completely comply with disclosure requirements.

As Plaintiff's actions have caused this litigation to spiral out of control, depriving Defendant of due process, causing this litigation to be unnecessarily multiplied, and causing to have filed an extremely long, frivolous, and fraudulent motion to distract Defendant from their Motion to Compel, Plaintiff should be deemed to have unclean hands and should not be granted any relief.

3. Defendant Should Be Granted Time To Respond to Discovery Requests as Permitting Plaintiff's Requests to be Permitted and Admitted Would Not be in the Best Interests of the Children

In any action for determining physical custody of a minor child, the sole consideration of the court is the best interest of the child. NRC 125C.0035.

In this matter Plaintiff and Plaintiff's Counsel have failed to comply with NRCP 26, NRCP 16.2, and have exhibited an extremely abusive course of conduct throughout the duration of litigation. Plaintiff caused Defendant to believe that a settlement would be reached prior to answering discovery, then failed to proceed with said promises. Plaintiff has intentionally deprived Defendant of Due Process, Plaintiff has committed Fraud, and Plaintiff has caused Defendant to spend hundreds of hours to prepare filings simply to try and remedy the deprivation of due process and illegal withholding of Defendant's children, an right deemed as an "essential right" of the litigant by the Nevada Supreme Court.

In this matter Defendant was represented by Counsel until November 24, 2020. Defendant supplied Counsel with documentation necessary to provide answers to Plaintiff's Discovery Requests. When Defendant was unable to afford representation, Defendant requested all discovery submitted from Plaintiff, and got no response. Defendant was unable to obtain his file from previous Counsel as Defendant owed money to previous Counsel. As such, Defendant was not aware of discovery proceedings. Additionally, Defendant requested Plaintiff resend discovery requests. Plaintiff resent interrogatories and requests for production, but did not send Defendant Plaintiff's Requests for Admission.

Further, upon review of Plaintiff's Requests for Admission contained in their Motion to Compel, it is apparent that nearly all of Plaintiff's Requests for Admission are improper, seek legal conclusions, seek answers to facts already established by evidence, seek irrelevant information, and merely seek to establish "facts" which are not easily determinable and not

reasonably in dispute. "The purpose of procedural statutes such as NRCP 36 is to obtain admission of facts which are in no real dispute and which the adverse party can admit cleanly, without qualifications." *Morgan*, 106 Nev. at 675-76, 799 P.2d at 564. Denial of requests for admission calling for either crucial facts central to the lawsuit or legal conclusions are proper. *Id.*

In this matter, since Defendant has now seen Plaintiff's Requests for Admission, Defendant objects to all Requests as all requests ask for crucial facts central to the lawsuit or for legal conclusions. Additionally, Plaintiff's request to have said requests for admission admitted should be denied for the same reasoning. Likewise, the best interests of the children in this matter would not be best served by allowing the abusive litigation practices of Plaintiff and her Counsel result in the admission of crucial facts central to the lawsuit or legal conclusions, when the truth is not congruent with Plaintiff's Requests for Admission.

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III.
CONCLUSION

This Honorable Court should enter an Order Denying Plaintiff's Requested Relief. Plaintiff and her Counsel have unethically and illegally embarked on a course of extremely abusive litigation practices that have affected the very core of this litigation. Plaintiff has not complied with NRCP 26, NRCP 16.2, Plaintiff has needlessly multiplied the litigation, Plaintiff has illegally and unethically deprived Defendant of basic due process, and Plaintiff has illegally and unethically caused Defendant to be wrongfully incarcerated causing significant hardship to Defendant. The best interest of the minor children would be best served by Denying Plaintiff's requests for relief.

DATED this 17th day of March 2021.

/s/ Bradley Bellisario

Bradley Bellisario
7100 Grand Montecito Pkwy, #2054
Las Vegas, NV 89149
T: 702.936.4800
F: 702.936.4801
E: bradb@bellisariolaw.com
Defendant Pro Se

DECLARATION OF BRADLEY J. BELLISARIO

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

1. I am the Defendant in the above entitled matter;
2. That I read the foregoing **OPPOSITION TO NOTICE OF MOTION AND MOTION TO COMPEL DISCOVERY, FOR ATTORNEY'S FEES AND COSTS, AND RELATED RELIEF**, 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 OPPOSITION, I am requesting that the Court grant me the relief sought in my Opposition.

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

DATED this 17th day of March 2021.

Bradley J. Bellisario *Defendant Pro Se*

CERTIFICATE OF SERVICE

I hereby certify that I am Defendant in the above-entitled matter, and on the 16th day of March 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 TO NOTICE OF MOTION AND MOTION TO COMPEL DISCOVERY, FOR ATTORNEY'S FEES AND COSTS, AND RELATED RELIEF** to:

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

By: _____
Bradley Bellisario, *Defendant*

FILED
APR 05 2021
CLERK OF COURT

TRANS

ORIGINAL

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

EMILY BELLISARIO,	)	
Plaintiff,	)	CASE NO. D-20-605263-D
vs.	)	DEPT. P
BRADLEY JOHN BELLISARIO,	)	
Defendant.	)	

BEFORE THE HONORABLE JAY YOUNG
DISTRICT COURT SPECIAL MASTER

TRANSCRIPT RE: MOTION

WEDNESDAY, MARCH 17, 2021

APPEARANCES:

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

1 LAS VEGAS, NEVADA WEDNESDAY, MARCH 17, 2021

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

3 (THE PROCEEDINGS BEGAN AT 2:07:40)

4

5 THE CLERK: We are on the record.

6 THE COURT: Very good. Calling Case Number -- does

7 somebody have two sources of audio on; computer and a phone?

8 THE DEFENDANT: I just have my computer on.

9 THE COURT: Okay. Mr. Bellisario, can I ask you to

10 mute yourself?

11 THE DEFENDANT: Yep.

12 THE COURT: See if that helps. Ah, that's better.

13 All right. Case Number D-20-605263-D, Bellisario vs.

14 Bellisario.

15 Please state your appearance for the record.

16 MS. ROBERTS: Amanda Roberts, bar number 9294 on

17 behalf of Emily Bellisario.

18 THE DEFENDANT: Bradley Bellisario, Defendant Pro

19 Se.

20 THE COURT: All right. Very good. This is

21 Plaintiff's motion to compel discovery, for attorneys fees and

22 costs and related relief. I did not see an opposition, Mr.

23 Bellisario. Did you file an opposition in this matter?

24 THE DEFENDANT: I did file one this morning. There

1 were other documents that were going to be filed yesterday and
2 Ms. Roberts and some other -- the District Attorney, had me
3 arrested yesterday, like they had me arrested the previous day
4 before the last family court hearing, so I didn't have a
5 chance to do anything then. And the time when they served me
6 this instant motion was the same day they sent me a 44-page
7 motion on an order shortening time, (indiscernible) for one
8 day to respond to that. And then we had a motion to
9 disqualify in which Judge --
10 THE COURT: All right. Hold on a second. Hold on.
11 Just limit yourself to the question that I've asked if you
12 would, please.
13 THE DEFENDANT: Yes, sir.
14 THE COURT: Let me see what I can find. I do see
15 that an opposition -- a late opposition was filed this
16 morning.
17 Ms. Roberts, have you had an opportunity to see
18 that?
19 MS. ROBERTS: I did not review it, Your Honor.
20 Another associate in my office did, but if I could just make a
21 record briefly.
22 We electronically served Mr. Bellisario and he
23 opened it, because we have electronic -- it tells us
24 electronically who opened it. He opened it on 2 -- let me

1 verify that, hold on. He opened it on the same day it was
2 filed on February 9th of 2020 -- 2021.
3 THE COURT: All right. Well, I will represent that
4 I have not seen your opposition and I'm not going to take time
5 right now to -- to read it. I will let you make a record, Mr.
6 Bellisario, and I will state, Ms. Roberts, I know that there's
7 a family court rule that allows a declaration, Rule 5.506,
8 that -- that allows a declaration about all facts that are
9 contained in motions -- sorry. But I don't find that that
10 type of an affidavit is sufficient to meet the requirements of
11 our meet and confer rule, which is EDCR 5.602.
12 So I would ask in the future that with regard to
13 your meet and confer requirements of the -- the requirements
14 under Rule 37, the requirements under Rule 5.602, that you
15 include all efforts that were made in your declaration, not
16 just in the body of the pleading itself. Could you do that,
17 please?
18 MS. ROBERTS: Sure, Your Honor.
19 THE COURT: Very good.
20 I will accept it this time, but next time please be
21 aware.
22 All right. So my understanding from the pleading is
23 that the request for production, the interrogatories and
24 request to produce, were first sent out in -- on June 10th of

2020. On October 22, 2020, the Court ordered Mr. Bellisario to deliver his financial books and records. On November 24th, an order was given to deli -- to again deliver financial records within seven days of that date, and that failure would result in the Court recommending an unequal distribution.

Today, my understanding is no interrogatories, request to produce, or request for admissions have been responded to, and no Rule 16.2 disclosures have been made.

Is that true, Ms. Roberts?

MS. ROBERTS: It is, Your Honor. As we sit here today, no 16.2 disclosures, no response to admissions or request for production of documents, interrogatories, or the documents ordered on October 22nd or November 24th.

THE COURT: Mr. Bellisario, is that true?

THE DEFENDANT: Partially. There is --

THE COURT: What por -- what portion is true and what portion is not true?

THE DEFENDANT: So I -- she served interrogatories and request for admission and request for production. I had an attorney at that point.

THE COURT: Sir, the question is, have --

THE DEFENDANT: I know, I --

THE COURT: -- you responded -- just listen to my question. Have you responded to interrogatories, yes or no?

1 THE DEFENDANT: I'm unaware if my attorney responded
2 or not. I gave them the documents. I have no idea. I asked
3 her for it, they -- their office didn't provide me if anything
4 was provided.
5 THE COURT: All right. When -- when did you part
6 ways with your counsel?
7 THE DEFENDANT: November 24th.
8 THE COURT: All right. Since November 24th, have
9 you responded to the interrogatories, request for production
10 of documents, or request for admissions?
11 THE DEFENDANT: I asked for them, I received some of
12 them.
13 THE COURT: Sir, the question -- and -- is answered
14 yes, Your Honor or no, Your Honor.
15 THE DEFENDANT: Is no, I did not receive everything
16 to answer, so I did not --
17 THE COURT: That wasn't my question. Did you or did
18 you not --
19 THE DEFENDANT: -- respond.
20 THE COURT: -- respond. Thank you. Have you, since
21 discharging your counsel, made the required financial
22 disclosures under Rule 16.2?
23 THE DEFENDANT: I have to get that information from
24 my attorney, which I've stated I don't have the money to get

1 it from him, so I have not at this point. I gave that to him,
2 so I don't.
3 THE COURT: All right. Ms. Roberts, do you desire
4 to provide me any information that is not included in your
5 moving papers?
6 MS. ROBERTS: There -- just so the Court's aware,
7 there was an additional letter sent to Mr. Bellisario on Jan -
8 - I believe it was January 11th of 2021, regarding additional
9 discovery. Other than that, Your Honor, I have nothing else.
10 And there was a letter sent yesterday so the Court's aware, so
11 that was March 16th of 2021. Mr. Bellisario alleged in that
12 letter, pursuant to 16.2, that discovery wasn't open, so I
13 gave him the information, cited to the Rule, under 16.2(e)(1),
14 I believe, Your Honor, that discovery opened in this matter on
15 April 24th of 2020 and there are -- are orders for the Court
16 closing discovery, therefore, it -- it implied that discovery
17 was open. So I gave him that information in those letters.
18 So two additional letters since the motion has been filed.
19 THE COURT: All right. Mr. Bellisario.
20 THE DEFENDANT: Yes, sir.
21 THE COURT: Now that you've answered my questions
22 and Counsel's been heard, you are free to make an argument,
23 which is what you tried to do when I was asking you questions.
24 THE DEFENDANT: Yes, sir.

1 THE COURT: Please proceed.

2 THE DEFENDANT: Okay. So at the beginning of this,
3 we never had any case conference, there was no case conference
4 before it, there's no scheduling order. I asked for a
5 scheduling order, all of that stuff to be done so we can know
6 when discovery's open, when dates close, all that different
7 stuff; none of that was ever done.

8 That's on Plaintiff to do. She's supposed to be the
9 one that initiates a joint case conference -- case conference
10 (indiscernible), all of that. That was never met.

11 As it comes to the discovery responses, I had an
12 attorney, I gave them the information, I don't know what's
13 going on with that. I informed Ms. Roberts and her office, I
14 don't have the money to get the file from him, so I asked him
15 for what -- anything that's been sent in discovery and I
16 received nothing.

17 The orders from July 30th, October 22nd and November
18 24th, weren't entered until January, the day after they got me
19 arrested on a false charge, which was already dropped, but I
20 spent two weeks in jail. So then they filed the orders from
21 July and October in January of 2021. And the reason is,
22 because then I didn't have time to respond to them, so I had
23 to file for NRCP 60 relief claiming fraud, because they
24 intentionally misrepresented facts in those.

1 So those claims are still out there, those motions
2 are still to be heard. I still have a motion for sanctions
3 against Ms. Roberts and her client regarding false documents,
4 fraudulent evidence they produced in their NRCP 16.2
5 disclosures, so I mean, at this point, I just think it would
6 be -- it wouldn't be in the best interest of the children to
7 decide these things on some sort of sanction when things were
8 never properly done in the beginning.
9 You know, there's all these motions out there for
10 sanctions regarding some of this being discovery matters and
11 being abuses of process, and I don't think Ms. Roberts is
12 going to be on this case very long after this anyway, because
13 the -- other things are happening. But I -- I just don't
14 think that it would be appropriate to decide the issues
15 conclusively, especially when I read her -- her request for
16 admission and her motion, and a lot of her improper being
17 conclusions of law, facts that aren't easily agreed upon, all
18 that kind of stuff, which is not the purpose of request for
19 admission.
20 THE COURT: All right. According to the -- I just
21 pulled up the Court's order from the November 24, 2020
22 hearing. According to the order that was signed by the Judge,
23 you were present at that hearing; is that -- is that correct?
24 THE DEFENDANT: Yes. That wasn't entered -- I think

1 they filed it the next -- or I asked them when they were going
2 to send it over to me to review for, you know, and send back a
3 -- either a proposed order or sign off on it. Mrs. Roberts'
4 assistant Colleen O'Brien (ph), a week later responded that
5 they sent it directly to the Judge, they didn't pass it
6 through me as required by EDCR -- I can't remember the rule
7 number, but it's what's required.
8 The Judge then had a affidavit of bias filed against
9 her, isn't supposed to do anything else on the case, she
10 signed it when she had that, so I filed a motion for relief
11 from that order because there were fraudulent facts in there,
12 because she didn't have jurisdiction to sign at that point,
13 because she's not supposed to do anything until that matter is
14 heard.
15 So that is still out there, too, that this motion --
16 it still has a motion for relief on it, the -- on the order,
17 because she didn't have jurisdiction to sign it, and they
18 didn't follow EDCR rules and pass it to me first.
19 THE COURT: All right. I am finding by operation of
20 Rule 5.503, that the Defendant Mr. Bellisario is deemed by
21 reason of his failure to oppose the motion timely to have
22 admitted that it has merit.
23 I further find, separate from the operation of Rule
24 5.503, that the Rule has merit on its own and that the

1 Plaintiff is entitled to an order under Rule 37 compelling
2 answers to interrogatories, compelling answers to request for
3 production of documents, and that all objections to the
4 interrogatories and request for production of documents are
5 waived. That by operation of rule, all request for admissions
6 are deemed admitted.
7 I'm therefore requiring responses to the
8 interrogatories and request for production of documents no
9 later than five days from today's date.
10 I'm also ordering that the Plaintiff is precluded
11 from presenting or relying on at trial or any evidentiary
12 hearing, any evidence required to be disclosed by Rule 16.1 --
13 or excuse me, 16.2, that are not disclosed within five days of
14 today's date.
15 MS. ROBERTS: Your Honor, I don't mean to interrupt
16 you. You said Plaintiff instead of Defendant. Can you
17 correct the record, please?
18 THE COURT: My apologies; Defendant.
19 MS. ROBERTS: I'm sorry. Thank you. I -- I'm sorry
20 to interrupt.
21 THE COURT: No, thank you. No -- no problem.
22 I'll also at that point in time order an adverse
23 inference that the evidence withheld would not support the
24 withholding of the parties' position, but it would refer the

1 actual language of that inference to the judge for making a
2 determination at the time of the trial or evidentiary hearing.
3 I'm also granting the request for attorneys fees
4 preliminarily under Rule 37(a)(5). The Defendant has had an
5 opportunity to oppose that, did not do so timely, did not
6 argue today that -- well, let me strike that. I think you did
7 argue today with that regard.
8 Plaintiff will be required to submit itemized
9 billing. I will require Brunzell factors to be set forth in a
10 separate declaration and please be -- be aware of the
11 requirements under Cadle v. Woods Erickson as well in your
12 submission, Counsel.
13 I'm going to set a status hearing for three weeks
14 out to make a determination as to the amount of fees. Please
15 include only fees that are directly related to this discovery
16 dispute. And I would consider those to be any and all meet
17 and confer activities, activities drafting today's motion,
18 attending today's hearing, and a -- an amount of time for the
19 hearing in two weeks.
20 Counsel, I'm going to ask that you prepare the
21 report and recommendation from this hearing and submit a draft
22 to Mr. Bellisario. If Mr. Bellisario does not respond within
23 48 hours, you are free to submit the report and recommendation
24 without his signature.

1 Mr. Bellisario, you will have that amount of time to
2 review for form and content. Do you understand that?
3 THE DEFENDANT: Yes, sir.
4 THE COURT: If you have to submit because Mr.
5 Bellisario has not responded within 48 hours, please submit
6 along with your submission proof that you gave him 48 hours'
7 opportunity, if you would, please.
8 I'll ask for a separate report and recommendation
9 regarding the amount of attorneys fees, but will wait on that
10 until the hearing in three weeks.
11 Is there any question?
12 THE DEFENDANT: How long does she have to get it to
13 me?
14 THE COURT: Counsel, can you get that to him by
15 Monday?
16 MS. ROBERTS: Yes, Your Honor. I'll have it to him
17 by Monday. Can you just clarify for the record, you shook
18 your head, but didn't confirm that you meant Defendant not
19 Plaintiff, would be precluded, just so that it's clear for the
20 record?
21 THE COURT: Yes, that is what I meant. I -- I
22 apologize.
23 MS. ROBERTS: Thank you, Your Honor. That's okay.
24 I appreciate it.

1 THE COURT: Mr. Bellisario, do you understand that
2 if you fail to comply with my order that you will be precluded
3 from presenting evidence at the time of trial?
4 THE DEFENDANT: (No audible response).
5 THE COURT: I'm sorry?
6 THE DEFENDANT: I said yes.
7 THE COURT: All right. You understand that if you
8 fail to provide the documents that are required by Rule 16.2,
9 within five days of today's date, that an adverse influence --
10 inference will be granted and the Judge will make a
11 determination as to the language of that adverse inference,
12 but I would recommend that the inference be that the documents
13 that you're withholding would not support your position? Do
14 you understand that?
15 THE DEFENDANT: Yep.
16 THE COURT: All right. Very good. Any further
17 questions or concerns?
18 THE DEFENDANT: Nope.
19 MS. ROBERTS: No --
20 THE COURT: Counsel?
21 MS. ROBERTS: -- Your Honor. Thank you.
22 THE COURT: Very good.
23 MS. ROBERTS: No, Your Honor.
24 THE COURT: Very good. Have a good day.

MS. ROBERTS: Thank you.

THE CLERK: Status check is going to be April 7th at 1:30. Oh, they're already gone.

(PROCEEDINGS CONCLUDED AT 2:24:40)

* * * * * *

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.

/s/ Kimberly C. McCright

Kimberly C. McCright, CET

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03/22/2021 10:51 AM
CLERK OF THE COURT

DAO

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

EMILY BELLISARIO, Petitioner, *vs.* BRADLEY BELLISARIO, Respondent.	Case No. D-20-605263-D Dept. No. P

DECISION AND ORDER

Mr. Bellisario has filed a motion for reconsideration of his motion to disqualify Judge Perry in this matter. This Court heard oral argument regarding the motion to disqualify on March 4 and subsequently denied the motion on March 9. In regard to his motion for reconsideration, Mr. Bellisario has not introduced additional evidence but states that the Decision and Order from March 9 contains an "intentionally deceiving and incomplete set of factual findings intended to support an incomplete consideration of the matter." Nevada law provides that a district court may reconsider a previously decided issue if substantially different evidence is subsequently introduced or the decision is clearly erroneous. Masonry & Tile Contractors Ass'n of S. Nevada v. Jolley, Urga & Wirth, Ltd., 941 P.2d 486, 489 (Nev. 1997), see also Moore v. City of Las Vegas, 551 P.2d 244, 246 (Nev. 1976) (holding that motions should only be reheard when there are new issues of fact or law raised).

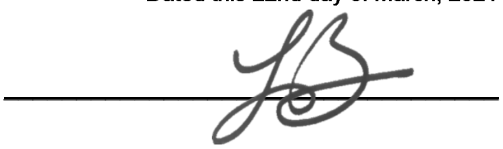
///

LINDA MARIE BELL
DISTRICT JUDGE
DEPARTMENT VII

This Court read the parties' motions, heard oral argument, and reviewed JAVS video of the hearing in question before denying Mr. Bellisario's motion to disqualify Judge Perry. Mr. Bellisario has not introduced any additional evidence that would warrant reconsideration nor has he demonstrated that the March 9 order was clearly erroneous.

Mr. Bellisario's motion is therefore denied.

Dated this 22nd day of March, 2021



1AB 94B AF89 7A02
Linda Marie Bell
District Court Judge

LINDA MARIE BELL
DISTRICT JUDGE
DEPARTMENT VII

CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Emily Bellisario, Plaintiff vs. Bradley John Bellisario, Defendant.	CASE NO: D-20-605263-D DEPT. NO. Department P

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Decision and 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:

Service Date: 3/22/2021

Amanda Roberts	efile@lvfamilylaw.com
Bradley Bellisario	bradb@bellisariolaw.com
Bradley Bellisario	bradb@bellisariolaw.com
Linda Bell	dept07lc@clarkcountycourts.us

Electronically Filed
3/22/2021 12:48 PM
Steven D. Grierson
CLERK OF THE COURT

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

DISTRICT COURT

CLARK COUNTY, NEVADA

EMILY BELLISARIO, Plaintiff, vs. BRADLEY BELLISARIO, Defendant	Case No.: D-20-605263-D Dept No.: P **NOTICE OF DEFENDANT'S INTENT TO FILE WRIT OF MANDAMUS AND MOTION TO STAY PROCEEDINGS**

COMES NOW the Defendant, Bradley Bellisario, *pro se*, and hereby provides Defendant's NOTICE OF DEFENDANT'S INTENT TO FILE WRIT OF MANDAMUS AND MOTION TO STAY PROCEEDINGS.

On Monday, March 22, 2021 Defendant received a copy of Judge Linda Bell's Order Denying Defendant's Motion for Reconsideration. Judge Bell's flawed Order is intentionally incredibly vague and void of any meaningful analysis.

Judge Bell was reversed on a nearly identical matter in December of 2020 and Defendant believes his success on the merits in the Court of Appeals of the State of Nevada is highly likely.

DATED this 22nd day of March 2021.

BY: /s/ Bradley Bellisario
Bradley Bellisario
Plaintiff Pro Se

7100 Grand Montecito Pkwy, #2054
Las Vegas, NV 89149
T: 309.397.6734
E: bradb@bellisariolaw.com

DECLARATION OF DEFENDANT BRADLEY BELLISARIO

I, Bradley Bellisario, declare and state as follows:

I, BRADLEY BELLISARIO, declare under penalty of perjury:

1. I have read the foregoing Notice of Defendant's Intent to File Writ of Mandamus and Motion to Stay Proceedings and the factual averments it contains are true and correct to the best of my knowledge, except as to those matters based on information and belief, and as to those matters, I believe them to be true. Those factual averments contained in the referenced filing are incorporated here as if set forth in full.
2. This Declaration is made in good faith and not made for the purpose of delay.

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

DATED this 22nd day of March 2021.

/s/ Bradley Bellisario
Bradley Bellisario

/ / /

/ / /

/ / /

/ / /

/ / /

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I AM THE DEFENDANT IN THE ABOVE-ENTITLED MATTER, AND ON THE 12TH DAY OF MARCH 2021, I SERVED BY AND THROUGH WIZ-NET ELECTRONIC SERVICE, PURSUANT TO CLARK COUNTY DISTRICT COURT ADMINISTRATIVE ORDER 14-2 FOR SERVICE OF DOCUMENTS IDENTIFIED IN RULE 9 OF THE N.E.F.C.R., THE FOREGOING **NOTICE OF DEFENDANT'S INTENT TO FILE WRIT OF MANDAMUS AND MOTION TO STAY PROCEEDINGS**, TO THE FOLLOWING:

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

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

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3/23/2021 11:07 AM
Steven D. Grierson
CLERK OF THE COURT

CNND

DISTRICT COURT
CLARK COUNTY, NEVADA

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

CLERK'S NOTICE OF NONCONFORMING DOCUMENT

Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, notice is hereby provided that the following electronically filed document does not conform to the applicable filing requirements:

Title of Nonconforming Document:	Defendant's Motion for Reconsideration Regarding Defendant's Motion to Disqualify Judge Mary Perry
Party Submitting Document for Filing:	Bradley J. Bellisario
Date and Time Submitted for Electronic Filing:	March 9, 2021 at 8:11 PM

Reason for Nonconformity Determination:

- ☐ The document filed to commence an action is not a complaint, petition, application, or other document that initiates a civil action. *See* Rule 3 of the Nevada Rules of Civil Procedure. In accordance with Administrative Order 19-5, the submitted document is stricken from the record, this case has been closed and designated as filed in error, and any submitted filing fee has been returned to the filing party.
- ☐ The document initiated a new civil action and the case type designation does not match the cause of action identified in the document.
- ☐ The document initiated a new civil action and a cover sheet was not submitted as required by NRS 3.275.
- ☐ The submitted document initiated a new civil action and was made up of multiple documents submitted together.
- ☐ The case caption and/or case number on the document does not match the case caption and/or case number of the case that it was filed into.

☐ The document was not signed by the submitting party or counsel for said party.

☐ The document filed was a court order that did not contain the signature of a judicial officer. In accordance with Administrative Order 19-5, the submitted order has been furnished to the department to which this case is assigned.

☒ Motion does not have a hearing designation per Rule 2.20(b). Motions must include designation "Hearing Requested" or "Hearing Not Requested" in the caption of the first page directly below the Case and Department Number.

Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, a nonconforming document may be cured by submitting a conforming document. All documents submitted for this purpose must use filing code "**Conforming Filing – CONFILE**." Court filing fees will not be assessed for submitting the conforming document. Processing and convenience fees may still apply.

Dated this: 23rd day of March, 2021

By: /s/ April Jones
Deputy District Court Clerk

CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2021, I concurrently filed and served a copy of the foregoing Clerk's Notice of Nonconforming Document, on the party that submitted the nonconforming document, via the Eighth Judicial District Court's Electronic Filing and Service System.

By: /s/ April Jones
Deputy District Court Clerk

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3/23/2021 4:38 PM
Steven D. Grierson
CLERK OF THE COURT

NORH

DISTRICT COURT; FAMILY DIVISION
CLARK COUNTY, NEVADA
* * * * *

EMILY BELLISARIO, Plaintiff,	)	Case No.: D-20-605263-D
-vs.-	)	Dept. P
BRADLEY JOHN BELLISARIO, Defendant.	)	

NOTICE OF RESCHEDULING HEARINGS

PLEASE TAKE NOTICE, that as the EDJC Chief Judge's Decision and Order filed March 9, 2021 denied the Defendant's Motion to Disqualify Dept. P to oversee the within matter and the Decision and Order filed March 22, 2021 denying Defendant's Motion for Reconsideration, that the following matters, previously taken off calendar due to Defendant's Motion to Disqualify, or are currently set to be heard and are being rescheduled, are now being set to be heard, by **PERSONAL APPEARANCE**, on **APRIL 6, 2021 at the hour of 10:00 AM:**

Plaintiff's Motion to Extend Protection Order, Joining Business/Appointing Receiver, Deeming Defendant a Vexatious Litigant, Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, Mental Health Evaluation, OSC-Contempt, Reduce Child Support Arrears to Judgment, Attorneys' Fees (filed 2/5/21 and 3/2/21) & Defendant's Motion to Strike Hearsay and Misrepresentations (filed 2/9/21) & Opposition/Countermotion for Attorney's Fees (filed 2/23/21) (previously taken off calendar)

Defendant's Motion for Relief from Amended 7/30/20 Order, 7/30/20 Initial Order, and 10/22/20 Order (filed 2/11/2021) (previously taken off calendar)

Defendant's Motion for Relief from Order from Hearing held 11/24/20 (filed 1/11/2021) & Plaintiff's Opposition & Countermotion for Attorney's Fees (filed 1/25/21) (previously taken off calendar)

MARY PERRY
DISTRICT JUDGE
FAMILY DIVISION, DEPT. P
LAS VEGAS, NV 89101-2408

Defendant's Motion for OSC Contempt and for Sanctions (filed 12/10/20) & Plaintiff's Opposition and Countermotion for Fees (filed 12/24/20) (previously taken off calendar)

Defendant's Motion for Protective Order (filed 3/18/21) - currently set to be heard April 28, 2021, and rescheduled by this Notice.

Plaintiff's (Re-Noticed) Motion to Extend Protection Order, Joining Business/Appointing Receiver, Deeming Defendant a Vexatious Litigant, Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, Mental Health Evaluation, OSC-Contempt, Reduce Child Support Arrears to Judgment, Attorneys' Fees (3/2/21) - currently set to be heard April 15, 2021, and rescheduled by this Notice.

Dated: 3/23/2021

/s/ Marj Arena
Marj Arena
Judicial Executive Assistant- Dept. P

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules, that on the date filed, a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System; or via US Mail to the last known addresses on file with the court.

Amanda Roberts, Esq.
email: efile@lvfamilylaw.com

Bradley J. Bellisario, Esq.
email: bradb@bellisariolaw.com

/s/ Marj Arena
Marj Arena
Judicial Executive Assistant- Dept. P

MARY PERRY
DISTRICT JUDGE
FAMILY DIVISION, DEPT. P
LAS VEGAS, NV 89101-2408

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3/30/2021 3:00 PM
Steven D. Grierson
CLERK OF THE COURT

OPPC
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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 **OPPOSITION TO DEFENDANT'S MOTION FOR RELIEF FROM AMENDED JULY 30, 2020 ORDER, JULY 30, 2020 ORDER AND OCTOBER 22, 2020 ORDER; AND COUNTERMOTION FOR AN AWARD OF ATTORNEY'S FEES AND COSTS.** Date of Hearing: April 6, 2021 Time of Hearing: 10:00 a.m. *Oral Argument Requested: Yes*

MEMORANDUM OF POINTS AND AUTHORITIES

I.

Issues

1. Bradley's request for relief from the Order from the hearing on July 30, 2020, should be denied.

2. Bradley's request for relief from the Order from the hearing on October 22, 2020, should be denied.

3. Emily's request for sanctions against Bradley should be granted.

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

5. 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.

On July 30, 2020, the Parties and Counsel appeared before the Court. At the time of the hearing, the Court Ordered that Counsel for the Parties were to meet and confer regarding Bradley's true income for the purpose of setting child support and temporary support. In follow up, on September 4, 2020, Attorney Roberts sent Attorney Tilman a correspondence attempting to resolve this issue[2]; however, Attorney Roberts never received a response. Therefore, on October 22, 2020, Attorney Roberts input her calculations related to the financial issues into the Order and sent it to Attorney Tilman for review and approval. After attempts to garner

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

[2] A copy of the correspondence sent by Ms. Roberts is attached to the companion filing as **Exhibit "*1*"** and is fully incorporated herein by reference.

Mr. Tilman's signature of approval were unsuccessful, Attorney Roberts submitted the Order to the Court. The Order After Hearing was filed January 24, 2021, and the Notice of Entry of Order was filed January 25, 2021.[3]

On October 22, 2020, the Parties and Counsel appeared before the Court. The Order was prepared by Attorney Roberts and sent to Attorney Tilman on November 11, 2020. However, no response was received. After attempts to garner Mr. Tilman's signature of approval were unsuccessful, Attorney Roberts submitted the Order to the Court. The Order After Hearing was filed January 20, 2021, and the Notice of Entry of Order was filed January 22, 2021.

In his Motion, Bradley argues that he should be granted relief from the Court Orders because there was a false police report filed related to violation of Protection Orders in place in this matter. A breakdown of the Protection Orders related to the Parties of this action are as follows:

The background for the information related to each of these cases is as follows:

- T-19-200357-T
  - Application filed- September 17, 2019.
  - TPO granted- Not Applicable.
  - Other outcome- Hearing Master indicated that additional information was needed to process the request for the TPO. Therefore, Court set a hearing for additional information. Case

[3] This Order was rejected by the Court, and a request made for a revision to comply with the Court Minutes. Ms. Roberts made the changes to comply with the Court Minutes and it was resubmitted to the Court on or about January 22, 2021.

did not move forward because the TPO was granted in T-19-200404-T.

- T-19-200404-T
  - Application filed- September 18, 2019.[4]
  - TPO granted- September 18, 2019.
  - TPO served- September 18, 2019, at noon.
  - Extended Order of Protection ("EOP") expiration- September 17, 2020.
  - Other outcome- Bradley has alleged that the EOP was dismissed. However, there is no Order in this file that the EOP was ever dismissed or dissolved. A review of the docket shows no such action ever happened in this matter.
- T-20-206639-T
  - Application filed- July 6, 2020.
  - TPO granted- July 6, 2020.
  - TPO served- July 8, 2020, at 1:35 p.m.
  - EOP granted- July 30, 2020 (Notice of Entry filed August 25, 2020).
  - EOP expiration- May 10, 2021.

Bradley has previously provided an Ex Parte Order filed February 14, 2020, which was signed only by Bradley's Counsel. The Ex Parte Order references a TPO under case number 051569. Ms. Roberts has attempted to locate said case number and it does not appear to exist. Ms. Roberts does not know where that case number is derived unless some specialized Order was issued in the "J" matter related to protection of Emily and the minor children. **To be clear, T-19-200404-T was never dismissed or dissolved even if it was the intent of the Parties! {EMPHASIS ADDED}** In fact, the Order filed in that case on March 12, 2020,

[4] Safe Nest assisted Emily in filing this TPO request.

does not even address whether the Order is valid or not, it only addressed the Order to Show Cause matter.

However, Bradley's arrest relates to pending criminal matter (20-CR-039342) for which Bradley was arrested, relating to an incident which happened on July 25, 2020 through July 26, 2020. Specifically, on or about July 26, 2020, Bradley repeatedly called Emily around midnight.[5] When Emily did not answer his calls, Bradley started sending her text messages the first one coming in at approximately 11:53 p.m. which stated, "Gonna murder You slut . . . I'm going to kill you before the 395 th slut bag[.]"[6] This is not the first time that Bradley has threatened to kill Emily, and she believes that if given the opportunity he has the ability to engage in this type of violence. **There was clearly a Protection Order in place on or about July 26, 2020, in case T-20-206639T, which was served upon Bradley on July 8, 2020, at 1:35 p.m. {EMPHASIS ADDED}**

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[5] A copy of the call log for Emily's cellular telephone is attached to the companion filing as **Exhibit "2"** and is hereby fully incorporated herein by reference.

[6] A copy of the text messages are attached to the companion filing as **Exhibit "3"** and is hereby fully incorporated herein by reference.

Bradley's Voicemails to Marathon Legal Group:

On July 2, 2020, the voicemail message is forty (40) seconds in length. The voice was identified as Bradley and was left on the voicemail for Marathon Legal Group. Throughout the voicemail, it is clear that Bradley is slurring his words. The voicemail is a follows:

- Hey Boris, F*ck you!
- F*cking Boris!
- F*ck you!
- Driving in your f*cking *inaudible*.
- F*cking Bor, f*ck you!
- They try to go in there and you want to get them in Joe, Joe's name. That's what I am trying to do. I heard them removing, in Joe's name.
- F*ck you Boris!
- I am coming for you motherf*cker!
- I am coming for you and f*cking Joe!
- Enjoy that shit!
- F*ck you Boris!
- I am f*cking coming for you, you f*cking piece of shit.
- F*ck you!

The voicemail message is fifty-eight (58) seconds in length, was left on or about September 16, 2020. The voice was identified as Bradley and was left on the voicemail for Marathon Legal Group. Throughout the voicemail, it appears Bradley is slurring his words. The voicemail is as follows:

- Hey Boris, Brad Bellisario.
- F*cking hilarious.
- Saw a video of Emily contradicting Joe in open Court when he is testifying in open Court.

- F*cking hilarious.
- As I told the Judge, he was lying which Emily proves he was.
- And also she goes, "Oh, Boris Avramski, is my attorney. I don't think he is a good attorney, but he is my friend's Dad. So, whatever."
- F*cking hilarious!
- F*ck you bitch!
- F*ck you, have Joe file more shit on your behalf that you know you are lying on.
- You f*ckers know you are lying, I can prove Joe was lying and prove Joe knew he was lying.
- Come at me motherf*ckers, come at me bitch.
- F*ck you Boris!
- F*ck you!

The voicemail message is fifty-seven (57) seconds in length, was left on or about September 16, 2020. The voice was identified as Bradley and was left on the voicemail for Marathon Legal Group. Throughout the voicemail, it appears Bradley is slurring his words. The voicemail is as follows:

- And Boris, I get these messages from Emily's the uh therapist that she hired you.
- So, I am filing a complaint against you for the ghostwriting of that complaint that you knew was false because you have information you knew was false in there.
- Also, um yeah, Joe signing that it was served via USPS when I wasn't even served.
- F*ck y'all!
- F*ck you!
- Right, F*ck you Boris!
- F*ck you, f*ck Joe, f*ck Vera, f*ck that little piece of shit you call a daughter, f*ck all of you!
- You f*cking pieces of shit!
- F*ck all of you.
- F*ck Javier, he sees you as a little piece of f*cking shit.
- I have seen the texts, I see everything.

- They see you as f*cking shit.
- So, have fun with that.

To date, all information received by the Court is considered an offer of proof. *EDCR* § 5.205 (g). The offers of proof are initial considerations by the Court and are not substantive evidence until admitted at the time of an Evidentiary Hearing/Trial. Bradley alleges that he can establish that Emily's offer of proof are incorrect. The proper method to resolve those claims is at the time of the Evidentiary Hearing/Trial, not through repetitive Motion filings to set aside Orders or reconsider Orders.

III.
Opposition

A. *Bradley's request for relief from the Order After Hearing entered from the hearing held July 30, 2020 and October 22, 2020 should be denied.*

In this matter, Bradley claims that he is entitled to relief based upon "excusable neglect, fraud and the judgment is void."[7] The first claim, excusable neglect, is that the Order contains "intentional misrepresentation of facts" but Bradley fails to address what is wrong with the Court's Order. The only finding made by the Court related directly to Attorney Roberts' arguments is as follows:

> THE COURT HEREBY FINDS that Attorney Roberts advised the Court that Counsels have not been able to address the financials of this case. Counsel further stated that, since the filing of the stipulation on June 10, 2020, Bradley has been arrested three (3) separate times: on

[7] *See* Motion at page 11, lines 1 through 2.

> June 22, 2020 for a DUI and violating the TPO (as it pertains to the Plaintiff), on July 2, 2020 for violating the Temporary Protection Order (specifically repeatedly threatening, in writing, to kill Emily), and on July 26, 2020 for aggravated stalking and threating, in writing, to kill Emily. Attorney Roberts further advised the Court as to the threats made by Bradley to Emily's prior Counsel, Joe Ricco, Esq., as well as making threats against Attorney Roberts' husband and Attorney Ricco's wife. Ms. Roberts represented Bradley is an attorney himself and issues regarding his behavior may be brought before the State Bar of Nevada. Bradley's behavior is very concerning to Counsel as she is very concerned for Emily's safety. Bradley cut off internet access to Emily's residence; therefore, she no longer has security surveillance at the residence. Counsel believes this was done in furtherance of his plan; Bradley specifically informed Emily on July 26, 2020, that he would kill Emily before today's hearing. (Video Timestamp: 11:26:49)

In order to address these issues, a breakdown is provided regarding the factual information:

- Bradley was arrested- Bradley was arrested as stated. Therefore, it was a factual statement which is accurate.
- Bradley threatened attorneys related to the case- Bradley left detailed voicemails at prior Counsel's office voicemail including addressing spouses by name. Bradley left inappropriate and harassing messages to Attorney Stoffel on social media. Prior Counsel has indicated reports were made to the State Bar of Nevada.

- Bradley told Emily in a text message, "Gonna murder You slut . . . I'm going to kill you before the 395 th slut bag[.]" This was directly before the hearing scheduled in the matter.

Again, those allegations are offers of proof which the Court gave there due weight. As it relates to the Order from October 22, 2020, there were no findings issued which would be factual asserts. Based upon the foregoing, Bradley's request for set aside because of excusable neglect should be denied.

The second claim is fraud for withholding the Orders. To be clear, Attorney Roberts attempted to work with Attorney Tilman to finalize the Orders and when it became apparent that the Orders would not be signed, Attorney Roberts submitted them to the Court as required. There was no fraud in submitting the Orders to the Court. As it relates to fraud, Bradley again alleges the factual claims are misrepresentation; however, as addressed herein, the Court gave the offers of proof the weight they deserved.

In order to determine whether or not to grant a Motion to Set Aside pursuant to *NRCP* 60(b) the Court must establish sufficient evidence is presented to find a set aside is warranted. *Smith v. Smith*, 102 Nev. 110, 716 P. 2d 229 (1986). Although the Court has broad discretion whether or not to grant a request to set aside, same cannot be sustained where there is no competent evidence to justify the Court's action. *Stoecklein v. Johnson Electric*, 109 Nev. 268, 849 P. 2d 305 (1993),

citing Lukey v. Thomas, 75 Nev. 20, 333 P. 2d 979 (1959). The moving Party must establish fraud by clear and convincing evidence. *Clark Sanitation, Inc., v. Sun Valley Disposal Co., Inc.*, 87 Nev. 338, 487 P.2d 337 (1971).

The third claim is that the Orders are void. Bradley claims that the Order are void because he filed a request to disqualify Judge Perry. The Order After Hearing from July 30, 2020, was filed January 24, 2021, and the Notice of Entry of Order was filed January 25, 2021; and the Order After Hearing from October 22, 2020, was filed January 20, 2021, and the Notice of Entry of Order was filed January 22, 2021. Bradley's request to disqualify Judge Perry was filed on February 10, 2021, which was after both Orders were signed. As such, the Orders are not void and Bradley was not denied any rights when the Orders were issued by the Court (Judge Pomrenze).

IV.
Countermotion

A. *Emily's request for sanctions against Bradley should be granted.*

Repeatedly, Bradley has filed Motion in which he attaches copious amounts of Exhibits the vast majority of which are pleadings in this matter. *EDCR* § 5.205 (f) provides that filed documents should not be made exhibits; *EDCR* § 5.205 (b) provides all Exhibits must be "[b]ate-stamped or otherwise identified by page number at the bottom right corner"; and *EDCR* § 5.205 (d) requires Exhibits to be filed separately with an appendix. In this matter, Bradley continues to violate these

rules which means nearly everything being filed by Bradley is substantially more than twenty-five (25) pages because he includes pleadings from this case or other cases filed in the Eighth Judicial District Court. As such, pursuant to *EDCR* § 7.60, Emily requests sanctions be issued against Bradley.

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

Emily was forced to defend herself against Bradley's instant Motion, which did not need to be filed. Bradley's instant Motion is without merit and should be denied. Additionally, Bradley failed to attempt to resolve the issues presented in his Motion in accordance with *EDCR* §5.501, and is not expected to be the prevailing Party; therefore, he is not entitled to any award of attorney's fees or costs. To the contrary, Emily was forced to defend herself with this Opposition, has following the Court's Orders, rules and guidelines, and is expected to be the prevailing Party, in accordance with *NRS* §18.010.

When dealing with attorney fees the Nevada Supreme Court has issued a litany of relevant cases including the holding in *Sargeant v. Sargeant*, 88 Nev. 223, 495 P.2d 618 (1972). In *Sargeant*, the Nevada Supreme Court considered a wife's award of attorney fees. The husband argued the attorney fees were excessive and should not have been granted from the husband's sole and separate property. The Court determined that **"[t]he wife must be afforded her day in court without**

destroying her financial position." This would imply that she should be able to meet her adversary in the courtroom on an equal basis." **{EMPHASIS ADDED}**

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

1. The quality of advocacy;[8]
2. The character of the work to be done;[9]
3. The work actually performed by the lawyer;[10] and
4. The results obtained.

Quality of Advocacy

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

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

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[8] When considering the quality of the advocacy the Court should look at the attorney's ability, training, education, professional standing, and skill.

[9] 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 Party when they have a relevancy to the litigation.

[10] When considering the work performed the Court should consider the skill, time, and attention given to the work.

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

Character of Work Done

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

Work Performed

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

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

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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 relief from all Orders contained in the Order After Hearing from the hearing held July 30, 2020 and October 22,2020.

2. Granting Emily's request for an award of attorney's fees and costs.

3. For any and all other relief the Court deems proper and just.

DATED this 30th day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

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

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 matter 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 30th day of March, 2021.

/s/ Emily Bellisario
Emily Bellisario

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, and on the 30 day of March, 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: _____
Employee of Roberts Stoffel Family Law Group

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Emily Bellisario
Plaintiff/Petitioner

v.

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.

☐ **$25** The Motion/Opposition being filed with this form is subject to the $25 reopen fee.

-OR-

☑ **$0** The Motion/Opposition being filed with this form is not subject to the $25 reopen fee because:

- ☑ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
- ☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
- ☐ 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 _____.
- ☐ Other Excluded Motion (must specify) _____.

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

☑ **$0** The Motion/Opposition being filed with this form is not subject to the $129 or the $57 fee because:

- ☑ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
- ☐ The party filing the Motion/Opposition previously paid a fee of $129 or $57.

-OR-

☐ **$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-

☐ **$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:
☑ **$0** ☐ **$25** ☐ **$57** ☐ **$82** ☐ **$129** ☐ **$154**

Party filing Motion/Opposition: Employee of Roberts Stoffel Family Law Group Date 3/30/31

Signature of Party or Preparer /s/ Amanda M. Roberts, Esq.

Electronically Filed
3/30/2021 3:00 PM
Steven D. Grierson
CLERK OF THE COURT

EXH

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 **EXHIBITS IN SUPPORT OF OPPOSITION TO DEFENDANT'S MOTION FOR RELIEF FROM AMENDED JULY 30, 2020 ORDER, JULY 30, 2020 ORDER AND OCTOBER 22, 2020 ORDER; AND COUNTERMOTION FOR AN AWARD OF ATTORNEY'S FEES AND COSTS.** Date of Hearing: March 25, 2021 Time of Hearing: 10:30 a.m.

In accordance with *EDCR* § 5.205, the Plaintiff, Emily Bellisario, hereby submits Exhibits in Support of In Support of Opposition To Defendant's Motion For Relief From Amended July 30, 2020 Order, July 30, 2020 Order And October

22, 2020 Order; And Countermotion For An Award Of Attorney's Fees And Costs as follows:

EXHIBIT	DESCRIPTION	BATE STAMP NUMBER
1.	September 4, 2020 correspondence sent by Ms. Roberts to Mr. Tillman	PLTF0581-PLTF0582
2.	Call log for Emily's cellular telephone	PLTF0460
3.	Text messages from Bradley	PLTF0461

DATED this 30th day of March, 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

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, and on the 30 day of March, 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 **EXHIBITS IN SUPPORT OF OPPOSITION TO DEFENDANT'S MOTION FOR RELIEF FROM AMENDED JULY 30, 2020 ORDER, JULY 30, 2020 ORDER AND OCTOBER 22, 2020 ORDER; AND COUNTERMOTION FOR AN AWARD OF ATTORNEY'S FEES AND COSTS** to the following:

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

By: C O'Brien
Employee of Roberts Stoffel Family Law Group

EXHIBIT “1”

EXHIBIT “1”

EXHIBIT “1”

ELECTRONICALLY SERVED
9/4/2020 6:58 AM

Amanda M. Roberts, Esq.
Jason P. Stoffel, Esq.
Lynn N. Hughes, Esq.
Gary M. Zernich, Esq.

4411 S. Pecos Road
Las Vegas, Nevada 89121

September 4, 2020

Sent Via Electronic Service Only

Christopher Tilman, Esq.
1211 S. Maryland Parkway
Las Vegas, Nevada 89104

Re: *Bellisario v. Bellisario (D-20-605263-D)*

Dear Chris:

This letter is sent pursuant to *EDCR* §5.501, in an attempt to resolve these matters prior to Court intervention.

Child Support and Temporary Spousal Support:

At the hearing on July 30, 2020, the Court Ordered that your client was required to pay child support, based upon his gross monthly earnings of $18,000.00. Therefore, under the new guidelines, I calculate your client's child support to be $2,560.00 in child support to my client, plus an addition $1,000.00 in temporary support, for a total obligation of $3,560.00 per month. The child support was retroactive to the Parties separation. I am putting together a breakdown of the arrears and will be sending it to you in the coming days.

For the month of July 2020, your client initially deposited $2,500.00 into the account, then paid some of his own expenses from the account, and following her birthday, he withdrew $1,500.00 while noting "happy early birthday." For the month of August 2020, your client deposited the sum of $1,000.00 into the joint account and then had his own bills withdrawn from the account (i.e. his water bill and student loan). As a result, your client's bills have caused the joint account to be overdrawn, and he needs to resolve this issue immediately. As soon as your client fixes the overdrawn account, I suggest we enter into an agreement to close the joint account and avoid further problems regarding accounts with joint ownership.

To prevent future and similar issues, I have directed my client to open a new account. I am requesting the support obligation be paid to the following account forthwith:

Bank of Nevada
Routing Number: 122401778
Account Number: 8793653541

\\\

Vehicle Registration:

The registration for the vehicle which my client drives expired at the end of August. Please instruct your client to renew the vehicle registration and provide my office with documentation confirming same immediately. We have previously made this request on behalf of our client and it is unreasonable that Mr. Bellisario continues to act in a manner inconsistent with the best interest of the community.

Vehicle Repair:

In April of 2020, the vehicle my client drives was rear ended. The Parties communicated regarding the matter, and since your client is the account holder for the automobile insurance, he was required to communicate with the insurance company. My client received a call from the insurance representative one (1) time to go over the details of the accident, but has not received any follow up and no adjuster has ever contacted her to take photos of the vehicle to determine the damage. The vehicle needs to be repaired. Therefore, please have your client provide the necessary information and authorization for my client to communicate with the insurance company regarding this matter.

Mail:

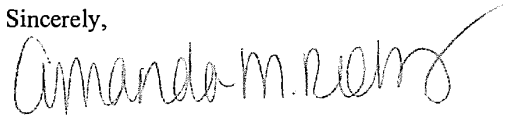
Your client's mail has been delivered to both the marital residence and to my client's father's business. My client has gathered up the mail and had it delivered to my office. I am requesting you arrange for same to be retrieved by a member of your staff or a runner service. Additionally, please instruct your client to put in a Change of Address with the post office.

Ponzo's Fees:

As previously addressed in my letter dated June 10, 2020, my client paid the initial fee of $250.00 to commence services with Nicholas Ponzo. Pursuant to our agreement, Bradley was supposed to be responsible for that expense; therefore, he should reimburse Emily the sum of $250.00. Since this is my second request for this reimbursement, I hereby request he pay this amount to my client within three (3) days after I provide the new bank account information for the direct deposits (as outlined herein above).

Thank you in advance for your prompt attention to this matter.

Sincerely,



Amanda M. Roberts, Esq.

cc: Client

EXHIBIT “2”

EXHIBIT “2”

EXHIBIT “2”

1:47

All Missed Edit

Recents

+1 (309) 397-6734 (3) FaceTime Audio	12:12 AM
911 unknown	12:09 AM
+1 (702) 909-8987 Las Vegas, NV	Yesterday
+1 (702) 541-7874 Las Vegas, NV	Yesterday
Yota New Phone Iphone (2) phone	Yesterday
Yota New Phone Iphone (3) phone	Yesterday
+1 (725) 209-5978 Indian Springs, NV	Yesterday
James SONIA other	Yesterday
James SONIA other	Friday
Yota Yaya Markos phone	Friday
Felipe phone	Friday

Favorites Recents Contacts Keypad Voicemail 10

PLTF0460

EXHIBIT “3”

EXHIBIT “3”

EXHIBIT “3”

1:48

+1 (309) 397-6734 >

Mon, Jul 6, 8:25 PM

Answer a GD ofw message asshole

And see I was being nice. I didn't call you and your dad giant fucking pieces of shit for what your were doing to Brayden or tell you to go fuck yourselves.

Text Message
Yesterday 11:53 PM

Gonna murder
You slut

Come see me before the 30th lor after. You're gonna pay for what guy did

I'm going to kill you before the 395 th slut bag

Your kids shkuidnt hear that shot from their retarded grandpa that never took care of them. See yuh in the after life slut

iMessage

See you soon whore bag

iMessage

Electronically Filed
3/30/2021 3:00 PM
Steven D. Grierson
CLERK OF THE COURT

OPPC
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 **PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR A PROTECTIVE ORDER; AND COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS, AND RELATED RELIEF.** Date of Hearing: April 28, 2021 Time of Hearing: 10:00 a.m. *Oral Argument Requested: Yes*

MEMORANDUM OF POINTS AND AUTHORITIES

I.
Issues

1. Bradley's request for a protective Order should be denied.

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

3. 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.

At the hearing on October 22, 2020, Bradley was Ordered to "deliver to Ms. Roberts immediately his financial books and records regarding his business and income." Bradley has failed to provide any financial documents to Ms. Roberts pursuant to the Judge's Order and pursuant to *NRCP* §16.2.

Again, at the hearing on November 24, 2020, Bradley was Ordered to provide financial records and business statements to Ms. Roberts office no later than the close of business on December 1, 2020. Bradley has failed to provide any financial documents to Ms. Roberts pursuant to the Judge's Order and pursuant to *NRCP* §16.2.

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

Bradley did not comply with the Court Orders. As a result of Bradley's refusal to cooperate in discovery, Attorney Roberts was forced to submit Subpoenas in an attempt to obtain financial records because Bradley failed to comply with the District Court Orders and *NRCP* § 16.2. The Subpoenas were noticed on March 9, 2021, after Bradley failed to comply with the District Court Order regarding the financial records, statements and books related to his law firm. In the Subpoenas, Attorney Roberts requested the following requested information from Nevada State Bank, Bank of Nevada, Bank of America, Chase and Wells Fargo:

> A copy of any and all account records, statements, applications, memorandums, notices, etc. for checking, savings, money market, 401k, lines of credit, credit card, etc., for Bradley John Bellisario (DOB: 11/01/1985; SSN: 215-19-0604) whether head individually or jointly, whether currently open or closed, for the period of August 16, 2014 to present.
>
> A copy of any and all account records, statements, applications, memorandums, notices, etc. for checking, savings, money market, 401k, lines of credit, credit card, IOLTA account, etc., for Bellisario Law and/or Bellisario Law, P.C., from December 15, 2014 to present.

In the Motion, Bradley alleges that requesting information regarding his IOLTA account is inappropriate because those accounts hold money owned by third-party beneficiaries that are entitled to attorney-client privilege. Bradley alleges the requests are blatantly illegal and done solely to harass Bradley.

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III.
Opposition

A. *Bradley's request for a protective Order should be denied.*

This is a divorce matter involving child custody and claims for spousal support by Emily. Bradley is a licensed attorney practicing in the State of Nevada. Bradley bar license number is 13452 and his license is showing active as of the date of filing this Opposition and Countermotion.

Pursuant to *NRCP* § 16.2 (e)(1) discovery in this matter opened on April 24, 2020. Judge Pomrenze set the closure of discovery in the Order from the hearing on November 24, 2020. Moreover, pursuant to *NRCP* § 16.2 (d), Bradley is required to provide mandatory disclosures without being requested. *NRCP* § 16.2 (d)(3)(A) does not limit the financial statements for attorneys in its requirement. Rather is using no qualifying word and simply says "all[.]" The specific language states, "A party must provide copies of all monthly or periodic bank, checking, savings, brokerage, investment, cryptocurrency, and security account statements in which any party has or had an interest for the period commencing 6 months before the service of the summons and complaint through the date of the disclosure." *Id.*

However, in this matter, Bradley never complied with *NRCP* § 16.2 which forced Attorney Roberts to address the matter at the Case Management Conference. At that time, Bradley was Ordered to provide "financial books and records regarding his business and income" and when that did not happen the Court again

entered an Order which provided that Bradley must provide "financial records and business statements to Ms. Roberts office no later than the close of business on December 1, 2020."

NRCP § 26 (b)(1) provides,

> Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claims or defenses and proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. Information within this scope of discovery need not be admissible in evidence to be discoverable.

In his Motion, Bradley alleges that information regarding monies in his IOLTA account are covered by attorney-client privilege. First, the District Court has already Ordered that those records be provided to Attorney Roberts and provided that "Ms. Roberts shall keep those records confidential, and they are for her review only, they cannot be reviewed by the Plaintiff." Moreover, *NRS* § 49.055 determines what is confidential between an attorney and the client. It states, "A communication is "confidential" if it is not intended to be disclosed to third persons other than those to whom disclosure is in furtherance of the rendition of professional legal services to the client or those reasonably necessary for the

IN THE SUPREME COURT OF THE STATE OF NEVADA

BRADLEY JOHN BELLISARIO
Appellant,

v.

EMILY BELLISARIO,

Respondent.

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. 9 PART 2

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Docket 84128 Document 2022-11224

INDEX OF APPELLANT APPENDIX

VOLUME:	BATES NUMBER:
1	00001 – 00250
2	00251 - 00500
3	00501- 00750
4	00751 - 01000
5	01001- 01250
6	01251 - 01500
7	01501 - 01750
8	01751 - 02000
9	02001 - 02250
10	02251 - 02500
11	02501 - 02750
12	02751 - 03000
13	03001 – 03250
14	03251 – 03500
15	03501 – 03750
16	03751 – 04000
17	04000 – 04250

18	04251 – 04500
19	04501 – 04750
20	04751 – 05000

INDEX OF APPELLANT APPENDIX
CHRONOLOGICAL ORDER

VOL.	DATE	PLEADING	BATES NO.
1	03/05/2020	Complaint for Divorce	AA0001-7
1	03/09/2020	Motion for Primary Physical Custody, et al.	AA0008-41
1	03/09/2020	Exhibit Appendix to Motion for Primary Physical Custody, et al.	AA0042-110
1	03/09/2020	Emily Bellisario Financial Disclosure Form	AA0111-121
1	03/13/2020	Errata to Motion for Primary Physical Custody, et al.	AA0122-126
1	03/13/2020	Ex Parte Application for Order Shortening Time	AA0127-140
1	03/25/2020	Acceptance of Service	AA0141-142
1	04/09/2020	Answer and Counterclaim	AA0143-147
1	04/09/2020	Opposition to Motion for Primary Physical Custody, et al.	AA0148-157
1	04/09/2020	Exhibits in Support of Opposition to Motion for Primary Physical Custody, et al.	AA0158-249
1-2	04/13/2020	Order Setting Case Management Conference	AA0250-259
2	04/15/2020	Bradley Bellisario Financial Disclosure Form	AA0260-267
2	04/29/2020	Reply to Opposition	AA0268-283
2	04/29/2020	Exhibit Appendix to Reply	AA0284-300
2	04/29/2020	Reply to Counterclaim	AA0301-303
2	06/10/2020	Stipulation and Order dated June 10, 2020	AA0304-307
2	06/11/2020	Notice of Entry of Stipulation and Order dated June 11, 2020	AA0308-314
2	07/30/2020	Court Minutes from July 30, 2020, Hearing	AA0315-316
2	07/30/2020	Order for Supervised Visitation dated July 30, 2020	AA0317
2	07/31/2020	Notice of Entry of Order for Supervised Visitation dated July 31, 2020	AA0318-320
2	10/22/2020	Court Minutes from October 22, 2020, Hearing	AA0321-324
2	11/24/2020	Court Minutes from November 24, 2020, Hearing	AA0325-326
2	11/25/2020	Affidavit Regarding Grounds for Disqualification of Judge	AA0327-333
2	12/01/2020	Affidavit of Sandra L. Pomrenze	AA0334-336

2	12/03/2020	Notice of Defendant's Non-Compliance with Court Order	AA0337-338
2	12/03/2020	Notice of Plaintiff's Non-Compliance with Court Order	AA0339-343
2	12/10/2020	Order After Hearing of November 24, 2020	AA0344-347
2-3	12/10/2020	Motion to Show Cause Why Plaintiff and/or Plaintiff's Counsel Should Not Be Held in Contempt and Motion for Sanctions	AA0348-545
3	12/11/2020	Notice of Entry of Order From the November 24, 2020, Hearing	AA0546-552
3	12/16/2020	Notice of Discovery Dispute Conference	AA0553-555
3	12/23/2020	Emily Bellisario Financial Disclosure Form	AA0556-566
3	12/24/2020	Opposition to Defendant's Motion to Show Cause Why Plaintiff and/or Plaintiff's Counsel Should Not Be Held in Contempt and Motion for Sanctions; And Countermotion for an Award of Attorney's Fees and Costs	AA0567-581
3	01/11/2021	Peremptory Challenge	AA0582-583
3	01/11/2021	Certificate of Service	AA0584-586
3	01/11/2021	Motion to Strike Plaintiff's Peremptory Challenge	AA0587-595
3-4	01/11/2021	Motion for Relief from Order After Hearing Regarding Hearing on November 24, 2020	AA0596-811
4	01/13/2021	Opposition to Defendant's Motion to Strike Plaintiff's Peremptory Challenge; and Countermotion for and Award of Attorney's Fees and Costs	AA0812-821
4	01/15/2021	Notice of Hearing and Order Regarding Procedures	AA0822-826
4	01/20/2021	Decision and Order re: Peremptory Challenge	AA0827-829
4	01/20/2021	Notice of Department Reassignment	AA0830-832
4	01/20/2021	Order After Hearing on October 22, 2020	AA0833-837
4	01/21/2021	Notice of Vacating Hearing	AA0838
4	01/21/2021	Notice of Scheduling Status Check	AA0839
4	01/22/2021	Notice of Entry of Order From the October 22, 2020, Hearing	AA0840-847
4	01/24/2021	Order After Hearing on July 30, 2020	AA0848-855
4	01/25/2021	Court Minutes From Status Check on January 25, 2021	AA0856-858

4	01/25/2021	Transcript re: Hearing on January 25, 2021, Status Check	AA0859-863
4	01/25/2021	Notice of Entry of Order From the July 30, 2020, Hearing	AA0864-874
4	01/25/2021	Opposition to Defendant's Motion for Relief From Order After Hearing Regarding Hearing on November 24, 2020; And Countermotion for An Award of Attorney's Fees and Costs	AA0875-887
4	02/05/2021	Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA0888-931
4-5	02/05/2021	Exhibits in Support of Motion to Extend Protection Order, et al.	AA0932-1003
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
5	02/05/2021	Ex Parte Application for Order Shortening Time	AA1022-1033
5	02/07/2021	Bradley Bellisario's Financial Disclosure Form	AA1034-1040
5	02/08/2021	Order Shortening Time	AA1041-1043
5	02/08/2021	Affidavit of Service	AA1044
5	02/09/2021	Minute Order of February 9, 2021	AA1045-1046
5	02/09/2021	Motion to Compel Discovery, for Attorney's Fees and Costs, and Related Relief	AA1047-1072
5	02/09/2021	Exhibits in Support of Motion to Compel	AA1073-1153

5	02/09/2021	Ex Parte Motion for Continuance of Hearing Set for February 11, 2021, at 1:30 p.m.	AA1154-1204
5-6	02/09/2021	Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion and Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1205-1271
6	02/10/2021	Affidavit Regarding Grounds for Disqualification of Judge	AA1272-1351
6	02/11/2021	Motion to Disqualify Judge Pursant to NCJC 2.11	AA1352-1443
6-7	02/11/2021	Motion for Relief from Amended July 30, 2020, Order, July 30, 2020, Order, and October 22, 2020, Order	AA1444-1537
7	02/11/2021	Notice of Defendant's Objection to Judge Mary Perry Hearing Any Argument Related to Hearing Scheduled for February 11, 2021 at 1:30 p.m.	AA1538/-1541
7	02/11/2021	Court Minutes from February 11, 2021	AA1542-1545
7	02/11/2021	Transcript re: Hearing on February 11, 2021, on All Pending Motions	AA1546-1548
7	02/16/2021	Response to Defendant's Motion to Disqualify Judge	AA1549-1554
7	02/16/2021	Order	AA1555-1557
7	02/19/2021	Opposition to Plaintiff's Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver	AA1558-1661

		for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	
7	02/23/2021	Reply to Judge Mary Perry's Response to Defendant's Motion to Disqualify Judge	AA1662-1670
7	02/23/2021	Opposition to Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion et al.; and Countermotion for an Award of Attorney's Fees and Costs	AA1671-1688
7	02/23/2021	Exhibits in Support of Opposition to Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion et al.; and Countermotion for an Award of Attorney's Fees and Costs	AA1689-1703
7	02/23/2021	Opposition to Defendant's Motion to Disqualify Judge Pursuant to NCJC 2.11; and Countermotion for an Award of Attorney's Fees and Costs and Related Relief	AA1704-1720
7	02/23/2021	Exhibits in Support of Opposition to Defendant's Motion to Disqualify, et al.	AA1721-1730
7	02/26/2021	Ex Parte Application for Order Shortening Time on Defendant's Motion to Disqualify Judge	AA1731-1739
7	02/26/2021	Notice of Defendant's Objection to Plaintiff's Ex Parte Application for Order Shortening Time	AA1740-1744
7	03/02/2021	Order Shortening Time	AA1745-1747
7-8	03/02/2021	Notice of Entry of Order Shortening Time	AA1748-1752

8	03/02/2021	Certificate of Service	AA1753-1754
8	03/03/2021	Affidavit of Service	AA1755
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
8	03/04/2021	Court Minutes from March 4, 2021	AA1798
8	03/04/2021	Transcript re: March 4, 2021, Court Hearing on All Pending Motions	AA1799-1816
8	03/09/2021	Decision and Order	AA1817-1823
8	03/09/2021	Notice of Entry of Decision and Order	AA1824-1833
8	03/09/2021	Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1834-1877
8	03/09/2021	Exhibits in Support of Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1878-1949

8	03/09/2021	Ex Parte Application for Order Shortening Time	AA1950-1961
8	03/09/2021	Notice of Defendant's Intent to Seek Post-Order Relief	AA1962-1965
8	03/09/2021	Defendant's Motion for Reconsideration Regarding Defendant's Motion to Disqualify Judge Mary Perry	AA1966-1979
8	03/10/2021	Order After Hearing	AA1980-19852
8	03/10/2021	Notice of Entry of Order After Hearing	AA1983-1988
8	03/11/2021	Ex Parte Application for Order Shortening Time	AA1989-1997
8-9	03/12/2021	Notice of Defendant's Objection to Plaintiff's Ex Parte Application for Order Shortening Time Dated 03/11/2021	AA1998-2002
9	03/16/2021	Motion for Protective Order	AA2003-2051
9	03/17/2021	Court Minutes from March 17, 2021	AA2052-2053
9	03/17/2021	Opposition to Notice of Motion and Motion to Compel Discovery, for Attorney's Fees and Costs, and Related Relief	AA2054-2066
9	03/17/2021	Transcript re: Hearing on Motion to Compel Discovery on March 17, 2021	AA2067-2081
9	03/22/2021	Decision and Order	AA2082-2084
9	03/22/2021	Notice of Defendant's Intent to File Write of Mandamus and Motion to Stay Proceedings	AA2085-2090
9	03/23/2021	Notice of Rescheduling Hearings	AA2091-2092
9	03/30/2021	Opposition to Defendant's Motion for Relief From Amended July 30, 2020, Order, July 30, 2020, Order and October 22, 2020 Order; And Countermotion for An Award of Attorney's Fees and Costs	AA2093-2110
9	03/30/2021	Exhibits in Support of Opposition to Motion for Relief From Amended July 30, 2020 Order, et al.	AA2111-2120

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
9	04/05/2021	Ex Parte Motion for Continuance of Hearing Set for April 6, 2021, at 10:00 a.m.	AA2136-2141
9	04/06/2021	Discovery Commissioner's Report and Recommendations	AA2142-2149
9	04/06/2021	Order for Supervised Visitation	AA2150
9	04/06/2021	Order on Discovery Commissioner's Report and Recommendations	AA2151-2161
9	04/06/2021	Notice of Defendant's Objection to Order on Discovery Commissioner's Report and Recommendation	AA2162-2165
9	04/06/2021	Notice of Entry of Protection Order Against Domestic Violence	AA2166-2169
9	04/06/2021	Notice of Entry of Order for Supervised Visitations	AA2170-2174
9-10	04/06/2021	Transcript re: April 6, 2021, Hearing on All Pending Motions	AA2175-2270
10	04/07/2021	Court Minutes from April 7, 2021	AA2271-2272
10	04/07/2021	Transcript re: Hearing re: Status Check	AA2273-2284
10	04/08/2021	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	AA2285-2315
10	04/08/2021	Minute Order of April 8, 2021	AA2316-2317
10	04/08/2021	Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2318-2330
10	04/14/2021	Memorandum of Attorney's Fees and Costs	AA2331-2379
10	04/14/2021	Court Minutes from April 6, 2021	AA2380-2381
10	04/22/2021	Opposition to Defendant's Motion for Relief From Order After Hearing Regarding Hearing on January 25, 2021 and Motion for Leave to	AA2382-2400

		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	
10	04/22/2021	Exhibits in Support of 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	AA2401-2411
10	04/22/2021	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	AA2412-2424
10	04/22/2021	Exhibits in Support of Plaintiff's Opposition to Reconsider Order Against Domestic Violence Entered April 6, 2021; And Countermotion for An Award of Attorney's Fees and Costs	AA2425-2430
10	04/22/2021	Court Minutes from April 22, 2021	AA2431-2432
10	04/22/2021	Amended Order After Hearing	AA2433-2440
10	04/23/2021	Order on Discovery Commissioner's Report and Recommendations	AA2441-2451
10	04/23/2021	Notice of Defendant's Objection to Mary Perry Taking Any Further Action in This Matter	AA2452-2455
10	04/26/2021	Notice of Discovery Dispute Conference	AA2456-2458
10	04/26/2021	Notice of Entry of Amended Order After Hearing	AA2459-2469

10	04/27/2021	Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2470-2478
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
11	04/30/2021	Order After Hearing	AA2517-2527
11	05/01/2021	Motion for Order to Show Cause Why Plaintiff and Plaintiff's Counsel, Amanda Roberts, Esq., Should Not Be Held in Contempt	AA2528-2567
11	05/02/2021	Ex Parte Motion for Return of Children	AA2568-2600
11	05/03/2021	Objection to Defendant's Discovery Requests and Subpoenas	AA2601-2604
11	05/03/2021	Notice of Entry of Order After Hearing	AA2605-2618
11	05/03/2021	Motion for Protective Order Relating to Bradley's Discovery Requests and Subpoena's [sic], for an Award of Attorney's Fees and Costs, and Related Relief	AA2619-2636
11-12	05/03/2021	Exhibits in Support of Plaintiff's Motion for Protection Order Relating to Bradley's Discovery Requests and Subpoena's [sic], for An Award of Attorney's Fees and Costs, and Related Relief	AA2637-2759

12	05/06/2021	Motion to Remove S.C.R.A.M. Device	AA2760-2778
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
12	05/10/2021	Notice of Plaintiff's Filing her Opposition to Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2786-2788
12	05/11/2021	Court Minutes from Hearing May 11, 2021	AA2789-2790
12	05/11/2021	Transcripts from May 11, 2021, Hearing re: Return Hearing	AA2791-2807
12	05/11/2021	Order for Supervised Visitation	AA2808
12	05/11/2021	Order After Hearing	AA2809-2815
12	05/12/2021	Notice of Entry of Order After Hearing	AA2816-2825
12	05/12/2021	Notice of Disclosure of Receivers and Certified Public Accountants	AA2826-2828
12	05/13/2021	Notice of Therapist	AA2829-2831
12	05/14/2021	Opposition to Defendant's Motion for an Order to Show Cuse 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	AA2832-2851
12	05/14/2021	Exhibits in Support of Plaintiff's Opposition to Defendant's Motion for an Order to Show Cuse Why Plaintiff and Plaintiff's Counsel, Amanda Roberts, Esq., Should Not Be Held In	AA2852-2912

		Contempt of Court; and Countermotion for An Award of Attorney's Fees and Costs	
12	05/17/2021	Opposition to Defendant's Motion to Remove S.C.R.A.M. Device; and Countermotion to Drug Test Defendant, for an Award of Attorney's Fees and Costs, and Related Relief, Declaration of Emily Bellisario	AA2913-2934
12-13	05/17/2021	Exhibits in Support of Opposition to Defendant's Motion to Remove S.C.R.A.M. Device; and Countermotion to Drug Test Defendant, for an Award of Attorney's Fees and Costs, and Related Relief	AA2935-3003
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
13	05/17/2021	Opposition to Plaintiff's Notice of Motion and Motion for Protection Order Relating to Bradley's Discovery Requests and Subpoenas, for an Award of Attorney's Fees and Costs, and Related Relief	AA3014-3022
13	05/18/2021	Court Minutes From May 18, 2021	AA3023-3025
13	05/18/2021	Transcript from Hearing on May 18, 2021 re: All Pending Motions	AA3026-3069
13	05/18/2021	Motion for Order Pursuant to NRS 200.359 (Parental Kidnapping by Plaintiff)	AA3070-3115
13	05/19/2021	Information Regarding Therapy Provided By Anna Trujillo As Requested By Judge Marry Perry at Hearing on May 18, 2021	AA3116-3135
13	05/21/2021	Notice of Deposition—Emily Bellisario	AA3136-3137
13	06/02/2021	Opposition to Defendant's Motion for Order Pursuant to NRS 200.359 (Parental Kidnapping by Plaintiff); and Countermotion to Deem Defendant Vexatious Litigant and for an Award of Attorney's Fees and Costs	AA3138-3150

13	06/10/2021	Notice of Discovery Dispute Conference	AA3151-3153
13	06/11/2021	Amended Notice of Discovery Dispute Conference	AA3154-3156
13	06/16/2021	Court Minutes from June 16, 2021, Hearing at 10:00 a.m.	AA3157-3158
13	06/16/2021	Transcript re: Court Hearing on June 16, 2021, at 10:00 a.m. re: All Pending Motions	AA3159-3165
13	06/16/2021	Court Minutes from June 16, 2021, Hearing at	AA3166-3167
13		1:00 p.m.	
13	06/25/2021	Memorandum of Fees and Costs as Ordered	AA3168-3197
13	06/26/2021	Order After Hearing on June 16, 2021	AA3198-3204
13	06/26/2021	Order After Hearing on May 18, 2021	AA3205-3214
13	06/28/2021	Notice of Entry of Order After Hearing on June 16, 2021	AA3215-3224
13	06/28/2021	Notice of Entry of Order After Hearing on May 18, 2021	AA3225-3237
13-14	07/06/2021	Discovery Commissioner's Report and Recommendations	AA3238-3254
14	07/07/2021	Court Minutes from July 7, 2021	AA3255-3256
14	07/07/2021	Transcript re: Hearing on July 7, 2021 re: All Pending Motions	AA3257-3265
14	07/09/2021	Notice of Intentional Misrepresentations by Plaintiff and Amanda Roberts Regarding Dr. Stephanie Holland	AA3266-3275
14	07/12/2021	Minute Order from July 12, 2021	AA3276-3277
14	07/12/2021	Order Deeming Defendant a Vexatious Litigant	AA3278-3287
14	07/12/2021	Notice of Entry of Order Deeming Defendant a Vexatious Litigant	AA3288-3300
14	07/20/2021	Order After Hearing	AA3301-3307

14	07/22/2021	Notice of Entry of Order After Hearing	AA3308-3316
14	07/23/2021	Minute Order from July 23, 2021, re: Order on Discovery Commissioner Report and Recommendation	AA3317-3318
14	07/23/2021	Order on Discovery Commissioner's Report and Recommendations	AA3319-3338
14	09/02/2021	Discovery Commissioner's Report and Recommendations	AA3339-3351
14	09/16/2021	Court Minutes from September 16, 2021	AA3352-3353
14	09/16/2021	Transcript From September 16, 2021, Hearing re: Return Hearing	AA3354-3361
14	09/17/2021	Order After Hearing	AA3362-3368
14	09/20/2021	Order on Discovery Commissioner's Report and Recommendations	AA3369-3384
14	09/20/2021	Notice of Entry of Order After Hearing	AA3385-3394
14	09/22/2021	Notice of Entry of Order on Discovery Commissioner's Report and Recommendations	AA3395-3413
14	11/19/2021	Plaintiff's Pre-Trial Memorandum	AA3414-3437
14	11/19/2021	Plaintiff's Initial List of Witnesses	AA3438-3445
14	12/13/2021	Emily's Financial Disclosure Form	AA3446-3456
14	12/20/2021	Court Minutes From Non-Jury Trial on December 20, 2021	AA3457-3459
14	12/20/2021	Plaintiff's Trial Exhibit List with Exhibits Offered/Admitted/Denied/Objections	AA3460-3476
14	12/20/2021	Plaintiff's Exhibit 1	AA3477-3480
14	12/20/2021	Plaintiff's Exhibit 2	AA3481-3488
14	12/20/2021	Plaintiff's Exhibit 3	AA3489-3493

14	12/20/2021	Plaintiff's Exhibit 4	AA3494-3497
14-15	12/20/2021	Plaintiff's Exhibit 5	AA3498-3508
15	12/20/2021	Plaintiff's Exhibit 6	AA3509-3515
15	12/20/2021	Plaintiff's Exhibit 7	AA3516-3525
15	12/20/2021	Plaintiff's Exhibit 8	AA3526-3532
15	12/20/2021	Plaintiff's Exhibit 9	AA3533-3539
15	12/20/2021	Plaintiff's Exhibit 10	AA3540-3546
15	12/20/2021	Plaintiff's Exhibit 11	AA3547-3556
15	12/20/2021	Plaintiff's Exhibit 12	AA3557-3580
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
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
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
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)	
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
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)	
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
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
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
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
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
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
19-20	12/20/2021	Transcript From Non-Jury Trial on December 20, 2021	AA4618-4862
20	12/21/2021	Plaintiff's Notice of Filing Exhibits Under Seal Exhibit "124"	AA4863-4865
20	12/23/2021	Findings of Fact, Conclusions of Law, and Decree of Divorce	AA4866-4897
20	12/23/2021	Notice of Entry of Findings of Fact, Conclusions of Law, and Decree of Divorce	AA4898-4932
20	01/20/2022	Notice of Appeal	AA4933-4935
20	01/20/2022	Case Appeal Statement	AA4936-4940

INDEX OF APPELLANT'S APPENDIX
ALPHABETICAL ORDER

VOL.	DATE	PLEADING	BATES NO.
1	03/25/2020	Acceptance of Service	AA0141-142
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
13	06/11/2021	Amended Notice of Discovery Dispute Conference	AA3154-3156
10	04/22/2021	Amended Order After Hearing	AA2433-2440
1	04/09/2020	Answer and Counterclaim	AA0143-147
2	04/15/2020	Bradley Bellisario Financial Disclosure Form	AA0260-267
5	02/07/2021	Bradley Bellisario's Financial Disclosure Form	AA1034-1040
20	01/20/2022	Case Appeal Statement	AA4936-4940
3	01/11/2021	Certificate of Service	AA0584-586
8	03/02/2021	Certificate of Service	AA1753-1754
1	03/05/2020	Complaint for Divorce	AA0001-7
10	04/22/2021	Court Minutes from April 22, 2021	AA2431-2432
10	04/14/2021	Court Minutes from April 6, 2021	AA2380-2381
10	04/07/2021	Court Minutes from April 7, 2021	AA2271-2272
7	02/11/2021	Court Minutes from February 11, 2021	AA1542-1545
12	05/11/2021	Court Minutes from Hearing May 11, 2021	AA2789-2790
2	07/30/2020	Court Minutes from July 30, 2020, Hearing	AA0315-316
14	07/07/2021	Court Minutes from July 7, 2021	AA3255-3256

13	06/16/2021	Court Minutes from June 16, 2021, Hearing at 1:00 p.m.	AA3166-3167
13	06/16/2021	Court Minutes from June 16, 2021, Hearing at 10:00 a.m.	AA3157-3158
9	03/17/2021	Court Minutes from March 17, 2021	AA2052-2053
8	03/04/2021	Court Minutes from March 4, 2021	AA1798
13	05/18/2021	Court Minutes From May 18, 2021	AA3023-3025
14	12/20/2021	Court Minutes From Non-Jury Trial on December 20, 2021	AA3457-3459
2	11/24/2020	Court Minutes from November 24, 2020, Hearing	AA0325-326
2	10/22/2020	Court Minutes from October 22, 2020, Hearing	AA0321-324
14	09/16/2021	Court Minutes from September 16, 2021	AA3352-3353
4	01/25/2021	Court Minutes From Status Check on January 25, 2021	AA0856-858
8	03/09/2021	Decision and Order	AA1817-1823
9	03/22/2021	Decision and Order	AA2082-2084
4	01/20/2021	Decision and Order re: Peremptory Challenge	AA0827-829
8	03/09/2021	Defendant's Motion for Reconsideration Regarding Defendant's Motion to Disqualify Judge Mary Perry	AA1966-1979
10	04/08/2021	Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2318-2330
10	04/27/2021	Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2470-2478
9	04/06/2021	Discovery Commissioner's Report and Recommendations	AA2142-2149
13-14	07/06/2021	Discovery Commissioner's Report and Recommendations	AA3238-3254
14	09/02/2021	Discovery Commissioner's Report and Recommendations	AA3339-3351

1	03/09/2020	Emily Bellisario Financial Disclosure Form	AA0111-121
3	12/23/2020	Emily Bellisario Financial Disclosure Form	AA0556-566
14	12/13/2021	Emily's Financial Disclosure Form	AA3446-3456
1	03/13/2020	Errata to Motion for Primary Physical Custody, et al.	AA0122-126
1	03/13/2020	Ex Parte Application for Order Shortening Time	AA0127-140
5	02/05/2021	Ex Parte Application for Order Shortening Time	AA1022-1033
8	03/09/2021	Ex Parte Application for Order Shortening Time	AA1950-1961
8	03/11/2021	Ex Parte Application for Order Shortening Time	AA1989-1997
7	02/26/2021	Ex Parte Application for Order Shortening Time on Defendant's Motion to Disqualify Judge	AA1731-1739
9	04/05/2021	Ex Parte Motion for Continuance of Hearing Set for April 6, 2021, at 10:00 a.m.	AA2136-2141
5	02/09/2021	Ex Parte Motion for Continuance of Hearing Set for February 11, 2021, at 1:30 p.m.	AA1154-1204
11	05/02/2021	Ex Parte Motion for Return of Children	AA2568-2600
1	03/09/2020	Exhibit Appendix to Motion for Primary Physical Custody, et al.	AA0042-110
2	04/29/2020	Exhibit Appendix to Reply	AA0284-300
5	02/09/2021	Exhibits in Support of Motion to Compel	AA1073-1153
4-5	02/05/2021	Exhibits in Support of Motion to Extend Protection Order, et al.	AA0932-1003
8	03/09/2021	Exhibits in Support of Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce	AA1878-1949

		Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	
7	02/23/2021	Exhibits in Support of Opposition to Defendant's Motion to Disqualify, et al.	AA1721-1730
12-13	05/17/2021	Exhibits in Support of Opposition to Defendant's Motion to Remove S.C.R.A.M. Device; and Countermotion to Drug Test Defendant, for an Award of Attorney's Fees and Costs, and Related Relief	AA2935-3003
1	04/09/2020	Exhibits in Support of Opposition to Motion for Primary Physical Custody, et al.	AA0158-249
9	03/30/2021	Exhibits in Support of Opposition to Motion for Relief From Amended July 30, 2020 Order, et al.	AA2111-2120
7	02/23/2021	Exhibits in Support of Opposition to Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion et al.; and Countermotion for an Award of Attorney's Fees and Costs	AA1689-1703
11-12	05/03/2021	Exhibits in Support of Plaintiff's Motion for Protection Order Relating to Bradley's Discovery Requests and Subpoena's [sic], for An Award of Attorney's Fees and Costs, and Related Relief	AA2637-2759
10	04/22/2021	Exhibits in Support of 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	AA2401-2411
12	05/14/2021	Exhibits in Support of Plaintiff's Opposition to Defendant's Motion for an Order to Show Cuse Why Plaintiff and Plaintiff's Counsel, Amanda Roberts, Esq., Should Not Be Held In	AA2852-2912

		Contempt of Court; and Countermotion for An Award of Attorney's Fees and Costs	
10	04/22/2021	Exhibits in Support of Plaintiff's Opposition to Reconsider Order Against Domestic Violence Entered April 6, 2021; And Countermotion for An Award of Attorney's Fees and Costs	AA2425-2430
20	12/23/2021	Findings of Fact, Conclusions of Law, and Decree of Divorce	AA4866-4897
13	05/19/2021	Information Regarding Therapy Provided By Anna Trujillo As Requested By Judge Marry Perry at Hearing on May 18, 2021	AA3116-3135
10	04/14/2021	Memorandum of Attorney's Fees and Costs	AA2331-2379
13	06/25/2021	Memorandum of Fees and Costs as Ordered	AA3168-3197
14	07/12/2021	Minute Order from July 12, 2021	AA3276-3277
14	07/23/2021	Minute Order from July 23, 2021, re: Order on Discovery Commissioner Report and Recommendation	AA3317-3318
10	04/08/2021	Minute Order of April 8, 2021	AA2316-2317
5	02/09/2021	Minute Order of February 9, 2021	AA1045-1046
13	05/18/2021	Motion for Order Pursuant to NRS 200.359 (Parental Kidnapping by Plaintiff)	AA3070-3115
11	05/01/2021	Motion for Order to Show Cause Why Plaintiff and Plaintiff's Counsel, Amanda Roberts, Esq., Should Not Be Held in Contempt	AA2528-2567
1	03/09/2020	Motion for Primary Physical Custody, et al.	AA0008-41
9	03/16/2021	Motion for Protective Order	AA2003-2051
11	05/03/2021	Motion for Protective Order Relating to Bradley's Discovery Requests and Subpoena's [sic], for an Award of Attorney's Fees and Costs, and Related Relief	AA2619-2636

6-7	02/11/2021	Motion for Relief from Amended July 30, 2020, Order, July 30, 2020, Order, and October 22, 2020, Order	AA1444-1537
10	04/08/2021	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	AA2285-2315
3-4	01/11/2021	Motion for Relief from Order After Hearing Regarding Hearing on November 24, 2020	AA0596-811
5	02/09/2021	Motion to Compel Discovery, for Attorney's Fees and Costs, and Related Relief	AA1047-1072
6	02/11/2021	Motion to Disqualify Judge Pursant to NCJC 2.11	AA1352-1443
4	02/05/2021	Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA0888-931
8	03/09/2021	Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1834-1877
12	05/06/2021	Motion to Remove S.C.R.A.M. Device	AA2760-2778

2-3	12/10/2020	Motion to Show Cause Why Plaintiff and/or Plaintiff's Counsel Should Not Be Held in Contempt and Motion for Sanctions	AA0348-545
5-6	02/09/2021	Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion and Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1205-1271
3	01/11/2021	Motion to Strike Plaintiff's Peremptory Challenge	AA0587-595
20	01/20/2022	Notice of Appeal	AA4933-4935
9	03/22/2021	Notice of Defendant's Intent to File Write of Mandamus and Motion to Stay Proceedings	AA2085-2090
8	03/09/2021	Notice of Defendant's Intent to Seek Post-Order Relief	AA1962-1965
2	12/03/2020	Notice of Defendant's Non-Compliance with Court Order	AA0337-338
7	02/11/2021	Notice of Defendant's Objection to Judge Mary Perry Hearing Any Argument Related to Hearing Scheduled for February 11, 2021 at 1:30 p.m.	AA1538/-1541
10	04/23/2021	Notice of Defendant's Objection to Mary Perry Taking Any Further Action in This Matter	AA2452-2455
9	04/06/2021	Notice of Defendant's Objection to Order on Discovery Commissioner's Report and Recommendation	AA2162-2165

7	02/26/2021	Notice of Defendant's Objection to Plaintiff's Ex Parte Application for Order Shortening Time	AA1740-1744
8-9	03/12/2021	Notice of Defendant's Objection to Plaintiff's Ex Parte Application for Order Shortening Time Dated 03/11/2021	AA1998-2002
4	01/20/2021	Notice of Department Reassignment	AA0830-832
13	05/21/2021	Notice of Deposition—Emily Bellisario	AA3136-3137
12	05/12/2021	Notice of Disclosure of Receivers and Certified Public Accountants	AA2826-2828
3	12/16/2020	Notice of Discovery Dispute Conference	AA0553-555
10	04/26/2021	Notice of Discovery Dispute Conference	AA2456-2458
13	06/10/2021	Notice of Discovery Dispute Conference	AA3151-3153
10	04/26/2021	Notice of Entry of Amended Order After Hearing	AA2459-2469
8	03/09/2021	Notice of Entry of Decision and Order	AA1824-1833
20	12/23/2021	Notice of Entry of Findings of Fact, Conclusions of Law, and Decree of Divorce	AA4898-4932
8	03/10/2021	Notice of Entry of Order After Hearing	AA1983-1988
11	05/03/2021	Notice of Entry of Order After Hearing	AA2605-2618
12	05/12/2021	Notice of Entry of Order After Hearing	AA2816-2825
14	07/22/2021	Notice of Entry of Order After Hearing	AA3308-3316
14	09/20/2021	Notice of Entry of Order After Hearing	AA3385-3394
13	06/28/2021	Notice of Entry of Order After Hearing on June 16, 2021	AA3215-3224
13	06/28/2021	Notice of Entry of Order After Hearing on May 18, 2021	AA3225-3237
14	07/12/2021	Notice of Entry of Order Deeming Defendant a Vexatious Litigant	AA3288-3300

2	07/31/2020	Notice of Entry of Order for Supervised Visitation dated July 31, 2020	AA0318-320
9	04/06/2021	Notice of Entry of Order for Supervised Visitations	AA2170-2174
4	01/25/2021	Notice of Entry of Order From the July 30, 2020, Hearing	AA0864-874
3	12/11/2020	Notice of Entry of Order From the November 24, 2020, Hearing	AA0546-552
4	01/22/2021	Notice of Entry of Order From the October 22, 2020, Hearing	AA0840-847
14	09/22/2021	Notice of Entry of Order on Discovery Commissioner's Report and Recommendations	AA3395-3413
7-8	03/02/2021	Notice of Entry of Order Shortening Time	AA1748-1752
9	04/06/2021	Notice of Entry of Protection Order Against Domestic Violence	AA2166-2169
2	06/11/2020	Notice of Entry of Stipulation and Order dated June 11, 2020	AA0308-314
4	01/15/2021	Notice of Hearing and Order Regarding Procedures	AA0822-826
14	07/09/2021	Notice of Intentional Misrepresentations by Plaintiff and Amanda Roberts Regarding Dr. Stephanie Holland	AA3266-3275
12	05/10/2021	Notice of Plaintiff's Filing her Opposition to Defendant's Motion to Reconsider Order Against Domestic Violence Entered April 6, 2021	AA2786-2788
2	12/03/2020	Notice of Plaintiff's Non-Compliance with Court Order	AA0339-343
9	03/23/2021	Notice of Rescheduling Hearings	AA2091-2092
4	01/21/2021	Notice of Scheduling Status Check	AA0839
12	05/13/2021	Notice of Therapist	AA2829-2831
4	01/21/2021	Notice of Vacating Hearing	AA0838
11	05/03/2021	Objection to Defendant's Discovery Requests and Subpoenas	AA2601-2604

12	05/14/2021	Opposition to Defendant's Motion for an Order to Show Cuse 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	AA2832-2851
13	06/02/2021	Opposition to Defendant's Motion for Order Pursuant to NRS 200.359 (Parental Kidnapping by Plaintiff); and Countermotion to Deem Defendant Vexatious Litigant and for an Award of Attorney's Fees and Costs	AA3138-3150
9	03/30/2021	Opposition to Defendant's Motion for Relief From Amended July 30, 2020, Order, July 30, 2020, Order and October 22, 2020 Order; And Countermotion for An Award of Attorney's Fees and Costs	AA2093-2110
4	01/25/2021	Opposition to Defendant's Motion for Relief From Order After Hearing Regarding Hearing on November 24, 2020; And Countermotion for An Award of Attorney's Fees and Costs	AA0875-887
10	04/22/2021	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	AA2382-2400
7	02/23/2021	Opposition to Defendant's Motion to Disqualify Judge Pursuant to NCJC 2.11; and Countermotion for an Award of Attorney's Fees and Costs and Related Relief	AA1704-1720
10	04/22/2021	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	AA2412-2424
12	05/17/2021	Opposition to Defendant's Motion to Remove S.C.R.A.M. Device; and Countermotion to	AA2913-2934

		Drug Test Defendant, for an Award of Attorney's Fees and Costs, and Related Relief, Declaration of Emily Bellisario	
3	12/24/2020	Opposition to Defendant's Motion to Show Cause Why Plaintiff and/or Plaintiff's Counsel Should Not Be Held in Contempt and Motion for Sanctions; And Countermotion for an Award of Attorney's Fees and Costs	AA0567-581
4	01/13/2021	Opposition to Defendant's Motion to Strike Plaintiff's Peremptory Challenge; and Countermotion for and Award of Attorney's Fees and Costs	AA0812-821
1	04/09/2020	Opposition to Motion for Primary Physical Custody, et al.	AA0148-157
7	02/23/2021	Opposition to Motion to Strike Hearsay and Misrepresentations of Material Fact Regarding Plaintiff's Notice of Motion et al.; and Countermotion for an Award of Attorney's Fees and Costs	AA1671-1688
9	03/17/2021	Opposition to Notice of Motion and Motion to Compel Discovery, for Attorney's Fees and Costs, and Related Relief	AA2054-2066
7	02/19/2021	Opposition to Plaintiff's Motion to Extend Protection Order, Joining Bradley's Business as a Party to the Action, Appoint a Receiver for the Business, Deeming Bradley a Vexatious Litigation [sic] and Consolidating Civil Cases to This Action, Modifying Legal Custody, Modifying Visitation, for Mental Health Evaluation, for Order to Show Cause and to Hold Bradley in Contempt, to Reduce Child Support Arrears to Judgment, to Reduce Temporary Support to Judgment, for an Award of Attorney's Fees and Costs, and Related Relief	AA1558-1661
13	05/17/2021	Opposition to Plaintiff's Notice of Motion and Motion for Protection Order Relating to Bradley's Discovery Requests and Subpoenas,	AA3014-3022

		for an Award of Attorney's Fees and Costs, and Related Relief	
7	02/16/2021	Order	AA1555-1557
8	03/10/2021	Order After Hearing	AA1980-19852
11	04/30/2021	Order After Hearing	AA2517-2527
12	05/11/2021	Order After Hearing	AA2809-2815
14	07/20/2021	Order After Hearing	AA3301-3307
14	09/17/2021	Order After Hearing	AA3362-3368
2	12/10/2020	Order After Hearing of November 24, 2020	AA0344-347
4	01/24/2021	Order After Hearing on July 30, 2020	AA0848-855
13	06/26/2021	Order After Hearing on June 16, 2021	AA3198-3204
13	06/26/2021	Order After Hearing on May 18, 2021	AA3205-3214
4	01/20/2021	Order After Hearing on October 22, 2020	AA0833-837
14	07/12/2021	Order Deeming Defendant a Vexatious Litigant	AA3278-3287
9	04/06/2021	Order for Supervised Visitation	AA2150
12	05/11/2021	Order for Supervised Visitation	AA2808
2	07/30/2020	Order for Supervised Visitation dated July 30, 2020	AA0317
9	04/06/2021	Order on Discovery Commissioner's Report and Recommendations	AA2151-2161
10	04/23/2021	Order on Discovery Commissioner's Report and Recommendations	AA2441-2451
14	07/23/2021	Order on Discovery Commissioner's Report and Recommendations	AA3319-3338
14	09/20/2021	Order on Discovery Commissioner's Report and Recommendations	AA3369-3384
1-2	04/13/2020	Order Setting Case Management Conference	AA0250-259
5	02/08/2021	Order Shortening Time	AA1041-1043

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 9 Part 2 as follows:

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

Amanda Roberts, Esq.
efile@lvfamilylaw.com

/s/ Crystal Beville
Crystal Beville

transmission of the communication."[2] In this matter, bank statements related to the IOLTA account are not confidential as defined by *NRS* § 49.055 and they were already Ordered to be disclosed. Furthermore, there is nothing in the IOLTA statements that would give rise to specific names of client's because any payments would be from insurance carriers as Bradley is a personal injury attorney. Although an IOLTA account is supposed to be for the purpose of holding client money, it is plausible that an attorney may using the IOLTA account as a sword and shield to hide monies that have already been paid, waiting until the litigation ceases in hopes of hiding funds from their spouse. Furthermore, in order for Emily to have the value of Bradley's business assessed for division of community property pursuant to *NRS* § 123.220 and *NRS* § 125.150 (1)(b), IOLTA account statements are going to be necessary to determine value.

Based upon the foregoing, Bradley's request for a protective Order should be denied.

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[2] Regularly the Court requires retainer agreements, proof of payment, billing invoices, and the like to be provided in litigation.

IV.
Countermotion

A. *Emily's request for an award of attorney's fees and costs should be granted.*

Emily was forced to defend herself against Bradley's instant Motion, which did not need to be filed. Bradley's was already Ordered to provide Attorney Roberts with "financial books and records regarding his business and income" and "financial records and business statements[.]" As such, this issue has already been addressed. Attorney Roberts had no choice other than to Subpoena the information because Bradley refused to comply with the Court Orders. Even as this Opposition is being filed, Bradley has not complied with the Court Order and has only given limited bank statements as follows:

Bank	Last 4	Period	Bates Stamp
Wells Fargo	9522	August 7, 2019 through December 7, 2020	DFNT 00001 through DFNT 00080
		December 7, 2020	DFNT00116 through DFNT00118
Wells Fargo	3573	5/31/2020 through November 30, 2020	DFNT00081 through DFNT00115

Bank	Last 4	Period	Bates Stamp
		January 31, 2021 through February 28, 2021	DFNT00119 through DFNT00125
Wells Fargo	2348	March 31, 2020	DFTN00126 through DFTN00128
		June 30, 2020	DFTN00129 through DFTN00132
		September 30, 2020 through October 31, 2020	DFTN00133 through DFNT00139
		December 31, 2020	DFTN00140 through DFTN00142
Wells Fargo	7891	April 30, 2020 through February 28, 2021	DFTN00143 through DFNT00185

Attorney Roberts is running into roadblocks left and right when it comes to Bradley's cooperation with the Court Orders and discovery. Attorney Roberts cannot prepare the case for Trial/Evidentiary Hearing when Bradley refuses to comply with Court Orders and the legal process. Bradley is not some pro per who

has no knowledge of the legal process, Bradley is an attorney and knows full well that his behavior is impeding the speedy resolution of this case.

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

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

1. The quality of advocacy;[3]
2. The character of the work to be done;[4]

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

[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 Party when they have a relevancy to the litigation.

3. The work actually performed by the lawyer;[5] and

4. The results obtained.

Quality of Advocacy

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

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

Character of Work Done

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

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

Work Performed

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

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

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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 a protection Order.
2. Granting Emily's request for an award of attorney's fees and costs.
3. For any and all other relief the Court deems proper and just.

DATED this 30th day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: Amanda M. Roberts

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

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 matter 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 30th day of March, 2021.

/s/ Emily Bellisario
Emily Bellisario

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, and on the 31 day of March, 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 **PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR A PROTECTIVE ORDER; AND COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS, AND RELATED RELIEF**, to the following:

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

By: _____
Employee of Roberts Stoffel Family Law Group

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Emily Bellisario
Plaintiff/Petitioner

v.

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.

☐ **$25** The Motion/Opposition being filed with this form is subject to the $25 reopen fee.

-OR-

☑ **$0** The Motion/Opposition being filed with this form is not subject to the $25 reopen fee because:

- ☑ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
- ☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
- ☐ 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 _____.
- ☐ Other Excluded Motion (must specify) _____.

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

☑ **$0** The Motion/Opposition being filed with this form is not subject to the $129 or the $57 fee because:

- ☑ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
- ☐ The party filing the Motion/Opposition previously paid a fee of $129 or $57.

-OR-

☐ **$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-

☐ **$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:
☑ **$0** ☐ **$25** ☐ **$57** ☐ **$82** ☐ **$129** ☐ **$154**

Party filing Motion/Opposition: Employee of Roberts Stoffel Family Law Group Date 3/30/21

Signature of Party or Preparer /s/ Amanda M. Roberts, Esq.

Electronically Filed
4/5/2021 2:52 PM
Steven D. Grierson
CLERK OF THE COURT

EXMT
BRADLEY J. BELLISARIO
Nevada Bar No. 13452
7100 Grand Montecito Pkwy, #2054
Las Vegas, NV 89149
T: (702) 936-4800
F: (702) 936-4801
E: BradB@BellisarioLaw.com
Plaintiff Pro Se

DISTRICT COURT

CLARK COUNTY, NEVADA

EMILY BELLISARIO, Plaintiff, vs. BRADLEY BELLISARIO, Defendant	Case No.: D-20-605263-D Dept No.: P **EX PARTE MOTION FOR CONTINUANCE OF HEARING SET FOR APRIL 6, 2021 AT 10:00 AM**

COMES NOW Bradley J. Bellisario, the Defendant in proper person, and requests a continuance of the court hearing regarding Plaintiff's NOTICE OF MOTION AND MOTION TO EXTEND PROTECTION ORDER, JOINING BRADLEY'S BUSINESS AS A PARTY TO THIS ACTION, APPOINT A RECIEVER FOR THE BUSINESS, DEEMING BRADLEY VEXATIOUS LITIGATION AND CONSOLIDATING CIVIL CASES TO THIS ACTION, MODIFYING LEGAL CUSTODY, MODIFYING VISITATION, FOR MENTAL HEALTH EVALUATION, FOR ORDER TO SHOW CAUSE AND TO HOLD BRADLEY IN CONTEMPT, TO REDUCE CHILD SUPPORT ARREARS TO JUDGMENT, TO REDUCE TEMPORARY SUPPORT TO JUDGMENT, FOR AN AWARD OF ATTORNEY'S FEES AND COSTS, AND RELATED RELIEF; DEFENDANT'S MOTION FOR PROTECTIVE ORDER; and all other scheduled hearings. This motion is made is good faith and is based on the attached

Points and Authorities, Declaration of Movant, the papers and pleadings on file herein, and such further evidence and argument that may be requested.

DATED this 5th day of April, 2021.

/s/ Bradley J. Bellisario
Bradley Bellisario
7100 Grand Montecito Pkwy, #2054
Las Vegas, NV 89149
T: 309.397.6734
F: 702.936.4801
E: bradb@bellisariolaw.com
Defendant Pro Se

POINTS AND AUTHORITIES

A party may request a continuance of a hearing through an ex parte motion. EDCR 5.525(c). This ex parte motion seeks to continue a hearing on the court's calendar.

FACTS AND ARGUMENTS

I. Current Court Date

There is a court date set for April 5, 2021 at 10:00 AM.

II. Prior Requests

This is Defendant's **FIRST** request to change the court date.

III. Attempt to Resolve

It would be futile and not possible to obtain a stipulation to continue the court hearing as Plaintiff's Counsel has repeatedly refused to address substantive issues regarding any of Defendant's communications with Plaintiff's Counsel. Likewise, Plaintiff's Counsel is unlikely to agree to a continuance as she is urgently requesting her close, personal friend Mary Perry hear this matter as Judge Perry has more than a de minimus interest in declaring that Amanda Roberts has done no wrong, as Amanda Roberts, Jason Stoffel and associates of the Roberts Stoffel Law

Group previously associated as counsel with Mary Perry. A finding that Amanda Roberts has repeatedly, and intentionally violated the Nevada Rules of Civil Procedure, Eighth Judicial District Court Rules, and Professional Code of Conduct to deprive opposing party of due process would be disadvantageous to Judge Mary Perry and her previous clients who Amanda Roberts and the Roberts Stoffel Law Firm represented.

IV. Reason for Continuance

On February 11, 2021 Defendant filed a Motion do Disqualify Judge Mary Perry. On February 16, 2021 Judge Perry filed a Response to Defendant's Motion to Disqualify Judge Mary Perry containing multiple mistakes of fact and misrepresentations of material fact. On February 23, 2021 Defendant filed a Reply to Judge Mary Perry's Response to Defendant's Motion to Disqualify. On February 23, 2021 Plaintiff also filed an Opposition to Defendant's Motion to Disqualify Judge Mary Perry. Notably, the Opposition contains arguments which Plaintiff directly contradicted during her Grand Jury testimony on March 3, 2021. On March 4, 2021 Defendant filed a Reply to Plaintiff's Opposition. On March 4, 2021 Judge Linda Bell heard the matter. Approximately thirty (30) minutes after Judge Bell heard the matter she was presented with a Grand Jury indictment procured by Plaintiff's inconsistent and perjurious testimony. On March 22, 2021 Judge Linda Bell filed a Decision and Order Denying Defendant's Motion. Defendant then filed a Motion for Reconsideration on March 22, 201 which was denied.

On March 22, 2021 Defendant filed a Notice of Intent to File Writ of Mandamus and Stay Proceedings. Defendant then requested the transcripts of the hearing on March 4, 2021 and related hearings. Defendant only received the finished transcripts on April 5, 2021. Defendant is preparing a Writ of Mandamus to the Court of Appeals regarding the Motion to Disqualify Judge Mary Perry. However, Defendant needed the transcripts to finish the filing. As such,

Defendant is only now able to work on finalizing the Writ of Mandamus. Defendant will have the Writ filed by April 9, 2021. As of the filing of the Writ Defendant will also file for a stay of proceedings. Defendant simply requests a continuance of the hearings set for April 6, 2021 to allow for the filing of the Writ of Mandamus and associated stay.

The Nevada Supreme Court has recently held that parents have a fundamental right concerning custody of their children.

> "[D]ue process of law [is] guaranteed by the Fourteenth Amendment of the United States Constitution and Article 1, section 8(5)...of the Nevada Constitution." *Rico v. Rodriguez*, 121 Nev. 695, 702-03, 120 P.3d 812, 817 (2005). Due process protects certain substantial and fundamental rights, including the interest parents have in the custody of their children. *Id.* At 704, 120 P.3d at 818. Further, due process demands notice before such a right is affected. *Wiese v. Granata*, 110 Nev. 1410, 1412, 887 P.2d 744, 745 (1994). Accordingly, a "party threatened with loss of parental rights must be given opportunity to disprove evidence presented." *Wallace v. Wallace*, 112 Nev. 1015, 1020, 922 P.2d 541, 544 (1996)(citing *Wiese*, 110 Nev. At 1413, 887 P.2d at 746).

Parents are entitled to be afforded notice and an opportunity to be heard regarding a change in visitation or custody. *Gordon v. Geiger*, 402 P.3d 671 (Nev. 2017).

Defendant is entitled to filing a writ relief request to hold the Court to established law of the case and perform their duties as they are required. Denying Defendant's request for continuance will greatly prejudice Defendant as all hearings will necessarily be reheard when Defendant's Writ of Mandamus is granted. Likewise, Plaintiff will not suffer any prejudice. Plaintiff has refused to comply with Court Orders regarding Custody since November 24, 2020, specifically after January 23, 2021. Plaintiff and Plaintiff's Counsel have been informed of their disobedience with custody Orders, however, they know without a Judge on the matter they can voluntarily conceal and hide the children from Defendant and police can't do a thing until a pickup order is entered. As such Plaintiff continues to defy court orders without recourse. Simply

Plaintiff will not be prejudiced as she continues to voluntarily spit in the face of the court and do whatever she feels like doing despite having no legal authority to do so.

V. New Date Requested

Defendant hereby requests this Honorable Court continue hearing on Plaintiff's Motion from April 6, 2021 at 10:00 AM to a new date after the resolution of Defendant's Writ of Mandamus to the Nevada Court of Appeals. Failing to grant Defendant's request for Continuance would severely prejudice Defendant Due Process Rights. Further, Defendant believes he is very highly likely to prevail in the Court of Appeals based upon the law of the case. When the case is remitted back to District Court the parties would need to rehear all motions currently set for April 6, 2021 as Judge Mary Perry is likely to be disqualified for the appearance of impropriety and actual bias.

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

DATED this 5th day of April 2021.

/s/ Bradley J. Bellisario

Bradley Bellisario
7100 Grand Montecito Pkwy, #2054
Las Vegas, NV 89149
T: 309.397.6734
F: 702.936.4801
E: bradb@bellisariolaw.com
Defendant Pro Se

AFFIDAVIT IN SUPPORT EX PARTE MOTION FOR CONTINUANCE OF HEARING SET FOR APRIL 6, 2021 AT 10:00 AM

STATE OF NEVADA)
) ss
COUNTY OF CLARK)

I, BRADLEY BELLISARIO, being duly sworn hereby state:

1. I am the Defendant in the above titled case located in Clark County Family Court and have personal knowledge of said case.
2. I have read the foregoing Motion and hereby certifies that the facts set forth therein are true of Affiant's own knowledge, except for those matters stated upon information and belief, and as to those matters, Affiant believes them to be true. Affiant incorporates these facts into this Affidavit as though fully set forth herein.
3. This Affidavit is made in good faith and not made for the purpose of delay.

Further your Affiant sayeth naught.

DATED this 5th day of April 2021.

Signature of Bradley Bellisario (Affiant)

This instrument was acknowledged
Before me on April 5th, 2021
by Defendant Bradley Bellisario.

Signature of Notarial Officer

Store Manager 4213
Title and Rank

FRANCINE A. GUERRERO-SERNA
Notary Public - State of Nevada
County of Clark
APPT. NO. 20-0168-01
My App. Expiress Sept. 30, 2024

Electronically Filed
4/6/2021 9:33 AM
Steven D. Grierson
CLERK OF THE COURT

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: March 17, 2021
Time of Hearing: 1:00 p.m.

Plaintiff, Emily Bellisario, not being present, but represented by Amanda M. Roberts, Esq., of Roberts Stoffel Family Law Group, and Defendant, Bradley Bellisario, being present in proper person. The Court, litigants and/or Counsel appearing through Blue Jeans.

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\\\

I.
FINDINGS

This hearing having come before the Discovery Commission on Plaintiff's Motion to Compel Discovery, for Attorney's Fees and Costs, and Related Relief.

THE COURT HEREBY FINDS that pursuant to EDCR 5.503(b), Defendant is deemed by reason of his failure to oppose the Motion timely, to have admitted that Motion at bar has merit. (Video Timestamp at 2:18:56)

THE COURT FURTHER FINDS that separate from the operation of EDCR 5.503(b), Plaintiff is entitled to an Order under NRCP 37 compelling answers to Interrogatories, compelling answers to Request for Production of Documents, and that all objections to the Request for Interrogatories and Request for Production of Documents are deemed waived. (Video Timestamp at 2:19:13)

THE COURT FURTHER FINDS that Plaintiff's request to deem as admitted, certain unanswered Requests for Admission, is denied as moot. The same are deemed admitted by operation of rule NRCP 36(a)(3). Therefore, any motion to deem the same admitted is both unnecessary and inappropriate.

THE COURT FURTHER FINDS that Defendant will respond to the Interrogatories and Request for Production of Documents no later than five (5) days from March 17, 2021 (i.e. on or before March 22, 2021). (Video Timestamp at 2:20:51)

THE COURT FURTHER FINDS that Defendant is precluded from presenting or relying on at Trial or any Evidentiary Hearing, any evidence required to be disclosed by NRCP 16.2 that is not disclosed within five (5) days of today's date (i.e. by March 22, 2021). (Video Timestamp at 2:20:03)

THE COURT FURTHER FINDS that an adverse inference is appropriate that any evidence withheld would not support the withholding Parties' position. The Commissioner refers the actual language of the inference to the District Court Judge to be determined at the time of the Trial. (Video Timestamp at 2:20:38)

THE COURT FURTHER FINDS that Plaintiff's request for Attorney's Fees is warranted and should be granted preliminarily, under rule NRCP 37(a)(5). Defendant has been provided notice and an opportunity to oppose Plaintiff's Motion to Compel and did not do so timely. (Video Timestamp at 2:20:58)

II.
RECOMMENDATIONS

GOOD CAUSE APPEARING THEREFOR,

IT IS HEREBY RECOMMENDED that Plaintiff's Motion is GRANTED in part and DENIED in part.

IT IS FURTHER RECOMMENDED that Plaintiff's request for an order compelling answers to First Request for Production of Documents is GRANTED. Defendant will respond to Plaintiff's First Request for Production of Documents

within five (5) days of today's hearings (i.e. by March 22, 2021). Defendant has waived all objections to the same because he failed to timely respond.

IT IS FURTHER RECOMMENDED that Plaintiff's request for an order compelling answers to First Request for Interrogatories is GRANTED. Defendant will respond to Plaintiff's First Request for Interrogatories within five (5) days of today's hearings (i.e. March 22, 2021). Defendant has waived all objections to the same because he failed to timely respond.

IT IS FURTHER RECOMMENDED that Plaintiff's request for an order precluding the presentation of evidence is GRANTED. Defendant is precluded from presenting or relying on at Trial or any Evidentiary Hearing, any evidence required to be disclosed by NRCP 16.2 that is not disclosed within five (5) days of today's hearing date (i.e. by March 22, 2021). (Video Timestamp at 2:20:03)

IT IS FURTHER RECOMMENDED that an adverse inference is issued. Plaintiff is entitled to an inference that any required NRCP 16.2 disclosure withheld and not disclosed by Defendant on or before March 22, 2021 would not support the withholding Defendant's position. The actual language of the inference will be determination at the time of the Trial or Evidentiary Hearing. (Video Timestamp at 2:20:38)

IT IS FURTHER RECOMMENDED that Plaintiff's request that this court deem Defendant admitted the facts contained in Plaintiff's First Request for

Admissions is DENIED as moot. Plaintiff seeks an order from the court deeming matters admitted, but the matters are automatically admitted by operation of Rule 36(a)(3), which reads

> A matter **is admitted** unless, within 30 days after being served, the party to whom the request is directed serves on the requesting party a written answer or objection addressed to the matter and signed by the party or its attorney.

Emphasis added.

IT IS FURTHER RECOMMENDED that Plaintiff be awarded attorney fees and costs. Plaintiff's Counsel will file an Affidavit of Counsel/Memorandum of Fees and Costs regarding the considered the factors as set forth in Brunzell v. Golden Gate National Bank, 85 Nev. 345, 455 P.2nd 31 (1969), plus the holdings in Cadle Co. v. Woods & Erickson, 345 P.3d 1049 (2015) and Wright v. Osburn, 114 Nev. at 1370, 970 P.2d at 1073 (1998). Plaintiff will be permitted to include fees related to the meet and confer, Motion, attendance at the hearings, plus anticipated fees for the status check hearing in two (2) weeks. The Court will issue a separate Report and Recommendation regarding the attorney fees and costs. (Video Timestamp at 2:22:38)

IT IS FURTHER RECOMMENDED that Attorney Roberts will prepare the Report and Recommendation and submit it to Defendant for consideration. Attorney Roberts will submit the Report and Recommendation to Defendant by March 22, 2021. Defendant will have forty-eight (48) hours from receipt of the

proposed Report and Recommendation to approve as to content and form, and if Defendant does not respond then Attorney Roberts will submit it to the Court with proof it was sent to Defendant.

IT IS FURTHER RECOMMENDED that a Status Check hearing regarding outstanding discovery and attorney's fees is scheduled for April 7, 2021, at 1:30 p.m.

DATED this 5th day of April, 2021.

Submitted this 26 day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: #7963 for:
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

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 person

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

EMILY BELLISARIO, Plaintiff, vs. BRADLEY JOHN 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 of 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 party within seven (7) days after being served with objections.

A copy of foregoing Discovery Commissioner's Report and Recommendations was:

___ Mailed to Plaintiff/Defendant on the ____day of ___, 2021, to the following address:

✓ Electronically filed and served on the 6TH day of April, 2021 to:

Amanda Roberts- efile@lvfamilylaw.com

Bradley John Bellisario- bradb@bellisariolaw.com

The Discovery Commissioner's Report and Recommendation is deemed received at the time it is e-served to a party or the party's attorney. Alternatively, the Discovery Commissioner's Report and Recommendation is deemed received three (3) days after mailing to a party or a party's attorney; or three (3) days after the Clerk of the Court deposits a copy of the Report and Recommendations in a folder of the party's attorney in the Clerk's Office. EDCR 2.34(f).

Dated this 6TH day of April, 2021.

Vivian A Canola

Commissioner Designee

ORDR

FILED IN OPEN COURT
April 6, 20 21
CLERK OF THE COURT
By: Kyra Medina
Deputy

DISTRICT COURT
CLARK COUNTY, NEVADA

Emily Bellisario, Plaintiff,

-vs-

Bradley Bellisario, Defendant.

Case No. D-20-605263-D

Department: P

ORDER FOR SUPERVISED VISITATION

The court finds that it is in the best interest of the parties' child(ren) that the Plaintiff's/Defendant's (circle one) visitation be supervised pursuant to this Order. Therefore,

IT IS HEREBY ORDERED that because the Court finds that the parties have not or cannot pick up and drop off their child(ren) for visitation at an agreeable location in a fashion that is safe for the child(ren) physically and/or emotionally, the parties shall utilize Donna's House services.

IT IS FURTHER ORDERED that the visitation schedule will be in effect as of (date) 4/06/21, provided BOTH parties complete orientation, for thirty (30) / sixty (60) / ninety (90) days and will occur as follows:

Visitation will occur as follows:			
Weekly / Every other week			
Wed / Thurs / Fri	Saturday / Sunday		
~~6 x x 7 x p.m. x x x x~~ ~~7 x x 8 x p.m. x x x~~	9 a.m. - 10 a.m. 10 a.m. - 11 a.m. 11 a.m. - 12 noon	12 noon - 1 p.m. 1 p.m. - 2 p.m. 2 p.m. - 3 p.m.	3 p.m. - 4 p.m. 4 p.m. - 5 p.m. 5 p.m. - 6 p.m.

IT IS FURTHER ORDERED that the parties shall contact Donna's House at (702) 455-4229 to schedule orientation. Failure to contact Donna's House may result in the family's inability to use said services, and the Court may issue sanctions against the responsible party of parties.

IT IS FURTHER ORDERED that the cost of said services is $20.00 per supervised visitation hour:

_____ 1) Fee shall be paid equally by both parties (i.e., $10.00 per hour by each party); or

✓ 2) ☒ Plaintiff ☐ Defendant shall pay the whole amount of $20 per supervised visitation hour; or

_____ 3) Fee for supervised visitation shall hereby be waived.

Said payments shall be paid directly to Donna's House, 601 N Pecos Rd, Bldg B, Las Vegas, NV. Said payment shall be made no later than the date of the exchange. Failure to pay may result in cancellation of the scheduled monitored visitation and the Court may issue sanctions against the responsible party or parties.

IT IS FURTHER ORDERED that the parties shall follow all rules and directives of Donna's House. Failure to follow all rules and directives may result in the immediate termination of services and the Court may issue sanctions against the responsible party or parties. The general rules are contained on the back of this order.

Grandparents are allowed for 1st weekend only

This matter is reset for:

Date: May 11, 2021 **Time:** 3:00pm

MB

DISTRICT JUDGE / COMMISSIONER

Attorney for Plaintiff: Amanda Roberts

Attorney for Defendant: Pro Se

White: Court Green: Plaintiff Goldenrod: Defendant Revised 08/5/10

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CLERK OF THE COURT

ORDR

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

EMILY BELLISARIO, Plaintiff, vs. BRADLEY BELLISARIO, Defendant	Case No.: D-20-605263-D Dept. No. P / Discovery

ORDER ON DISCOVERY COMMISSIONER'S REPORT AND RECOMMENDATIONS

The Court having reviewed the above Report and Recommendation's prepared by the Discovery Commissioner and,

X No timely objection having been filed,

X After reviewing the objection to the Report and Recommendation's and good cause appearing,

AND

X IT IS HEREBY ORDERED the Discovery Commissioner's Report and Recommendations are affirmed and adopted.

____ IT IS HEREBY ORDERED the Discovery Commissioner's Report and Recommendations are affirmed and adopted as modified in the following matter. (attached hereto)

____ IT IS HEREBY ORDERED this matter is remanded to the Discovery Commissioner for reconsideration or further action.

____ IT IS HEREBY ORDERED the Discovery Commissioner's Report and Recommendations are reversed.

____ IT IS HEREBY ORDERED that a hearing on the Discovery Commissioner's Report is

~~Set for the ____day of _____, 2021 at _____ a.m. / p.m.~~

~~Dated this ____day of ____, 2021.~~

Dated this 6th day of April, 2021

DISTRICT COURT JUDGE

249 BBF E726 D6AD
Mary Perry
District Court Judge

Electronically Filed
4/6/2021 9:33 AM
Steven D. Grierson
CLERK OF THE COURT

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: March 17, 2021
Time of Hearing: 1:00 p.m.

Plaintiff, Emily Bellisario, not being present, but represented by Amanda M. Roberts, Esq., of Roberts Stoffel Family Law Group, and Defendant, Bradley Bellisario, being present in proper person. The Court, litigants and/or Counsel appearing through Blue Jeans.

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I.
FINDINGS

This hearing having come before the Discovery Commission on Plaintiff's Motion to Compel Discovery, for Attorney's Fees and Costs, and Related Relief.

THE COURT HEREBY FINDS that pursuant to EDCR 5.503(b), Defendant is deemed by reason of his failure to oppose the Motion timely, to have admitted that Motion at bar has merit. (Video Timestamp at 2:18:56)

THE COURT FURTHER FINDS that separate from the operation of EDCR 5.503(b), Plaintiff is entitled to an Order under NRCP 37 compelling answers to Interrogatories, compelling answers to Request for Production of Documents, and that all objections to the Request for Interrogatories and Request for Production of Documents are deemed waived. (Video Timestamp at 2:19:13)

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II.
RECOMMENDATIONS

GOOD CAUSE APPEARING THEREFOR,

IT IS HEREBY RECOMMENDED that Plaintiff's Motion is GRANTED in part and DENIED in part.

IT IS FURTHER RECOMMENDED that Plaintiff's request for an order compelling answers to First Request for Production of Documents is GRANTED. Defendant will respond to Plaintiff's First Request for Production of Documents

within five (5) days of today's hearings (i.e. by March 22, 2021). Defendant has waived all objections to the same because he failed to timely respond.

IT IS FURTHER RECOMMENDED that Plaintiff's request for an order compelling answers to First Request for Interrogatories is GRANTED. Defendant will respond to Plaintiff's First Request for Interrogatories within five (5) days of today's hearings (i.e. March 22, 2021). Defendant has waived all objections to the same because he failed to timely respond.

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Admissions is DENIED as moot. Plaintiff seeks an order from the court deeming matters admitted, but the matters are automatically admitted by operation of Rule 36(a)(3), which reads

> A matter **is admitted** unless, within 30 days after being served, the party to whom the request is directed serves on the requesting party a written answer or objection addressed to the matter and signed by the party or its attorney.

Emphasis added.

IT IS FURTHER RECOMMENDED that Plaintiff be awarded attorney fees and costs. Plaintiff's Counsel will file an Affidavit of Counsel/Memorandum of Fees and Costs regarding the considered the factors as set forth in Brunzell v. Golden Gate National Bank, 85 Nev. 345, 455 P.2nd 31 (1969), plus the holdings in Cadle Co. v. Woods & Erickson, 345 P.3d 1049 (2015) and Wright v. Osburn, 114 Nev. at 1370, 970 P.2d at 1073 (1998). Plaintiff will be permitted to include fees related to the meet and confer, Motion, attendance at the hearings, plus anticipated fees for the status check hearing in two (2) weeks. The Court will issue a separate Report and Recommendation regarding the attorney fees and costs. (Video Timestamp at 2:22:38)

IT IS FURTHER RECOMMENDED that Attorney Roberts will prepare the Report and Recommendation and submit it to Defendant for consideration. Attorney Roberts will submit the Report and Recommendation to Defendant by March 22, 2021. Defendant will have forty-eight (48) hours from receipt of the

proposed Report and Recommendation to approve as to content and form, and if Defendant does not respond then Attorney Roberts will submit it to the Court with proof it was sent to Defendant.

IT IS FURTHER RECOMMENDED that a Status Check hearing regarding outstanding discovery and attorney's fees is scheduled for April 7, 2021, at 1:30 p.m.

DATED this 5th day of April, 2021.

Submitted this 26 day of March, 2021.

ROBERTS STOFFEL FAMILY LAW GROUP

By: #7963 for:
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

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 person

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

EMILY BELLISARIO, Plaintiff, vs. BRADLEY JOHN 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 of 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 party within seven (7) days after being served with objections.

A copy of foregoing Discovery Commissioner's Report and Recommendations was:

___ Mailed to Plaintiff/Defendant on the ____day of ___, 2021, to the following address:

✓ Electronically filed and served on the 6TH day of April, 2021 to:

Amanda Roberts- efile@lvfamilylaw.com

Bradley John Bellisario- bradb@bellisariolaw.com

The Discovery Commissioner's Report and Recommendation is deemed received at the time it is e-served to a party or the party's attorney. Alternatively, the Discovery Commissioner's Report and Recommendation is deemed received three (3) days after mailing to a party or a party's attorney; or three (3) days after the Clerk of the Court deposits a copy of the Report and Recommendations in a folder of the party's attorney in the Clerk's Office. EDCR 2.34(f).

Dated this 6TH day of April, 2021.

Vivian A Canola

Commissioner Designee

CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Emily Bellisario, Plaintiff vs. Bradley John Bellisario, Defendant.	CASE NO: D-20-605263-D DEPT. NO. Department P

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District 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:

Service Date: 4/6/2021

Amanda Roberts	efile@lvfamilylaw.com
Bradley Bellisario	bradb@bellisariolaw.com
Bradley Bellisario	bradb@bellisariolaw.com
Linda Bell	dept07lc@clarkcountycourts.us

Electronically Filed
4/6/2021 3:40 PM
Steven D. Grierson
CLERK OF THE COURT

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

DISTRICT COURT

CLARK COUNTY, NEVADA

EMILY BELLISARIO, Plaintiff, vs. BRADLEY BELLISARIO, Defendant	Case No.: D-20-605263-D Dept No.: P **NOTICE OF DEFENDANT'S OBJECTION TO ORDER ON DISCOVERY COMMISSIONER'S REPORT AND RECOMMENDATION**

COMES NOW the Defendant, Bradley Bellisario, *pro se*, and hereby provides Defendant's NOTICE OF DEFENDANT'S OBJECTION TO ORDER ON DISCOVERY COMMISSIONER'S REPORT AND RECOMMENDATION.

On April 6, 2021 Defendant was served a with a copy of Discovery Commissioner's Report and Recommendations which was electronically filed on April 6, 2021 and Defendant was served with the Discovery Commissioner's Report on April 6, 2021 at 9:33 am. Later in that same day, April 6, 2021, Judge Mary Perry filed an Order on Discovery Commissioner's Report and Recommendations at 3:13 PM and Defendant was served with a Copy of the Order on Discovery Commissioner's Report and Recommendations at 3:14 PM.

This is completely demonstrative of actual bias in favor of Plaintiff's Counsel, and entirely prejudices Defendant. Defendant has due process rights to file an objection to the Discovery Commissioner's Report and Recommendations Pursuant to NRCP 16.3:

> "Within 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 7 days after being served with the objections."

This is entirely unfair, causes Defendant further emotional distress, causes Defendant further hardship, and prejudices Defendant by wrongfully entering an Order affecting Defendant's due process rights and greatly affects substantive issues in the matter. Defendant wasn't even afforded a single day to file an objection, let alone the fourteen (14) days afforded to Defendant by NRCP 16.3.

DATED this 6th day of April 2021.

BY: /s/ Bradley Bellisario

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

DECLARATION OF DEFENDANT BRADLEY BELLISARIO

I, Bradley Bellisario, declare and state as follows:

I, BRADLEY BELLISARIO, declare under penalty of perjury:

1. I have read the foregoing Defendant's Objection to Order on Discovery Commissioner's Report and Recommendations and the factual averments it contains are true and correct to the best of my knowledge, except as to those matters based on information and belief, and as to those matters, I believe them to be true. Those factual averments contained in the referenced filing are incorporated here as if set forth in full.

2. This Declaration is made in good faith and not made for the purpose of delay.

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

DATED this 6th day of April 2021.

/s/ Bradley Bellisario
Bradley Bellisario

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I AM THE DEFENDANT IN THE ABOVE-ENTITLED MATTER, AND ON THE 6TH DAY OF APRIL 2021, I SERVED BY AND THROUGH WIZ-NET ELECTRONIC SERVICE, PURSUANT TO CLARK COUNTY DISTRICT COURT ADMINISTRATIVE ORDER 14-2 FOR SERVICE OF DOCUMENTS IDENTIFIED IN RULE 9 OF THE N.E.F.C.R., THE FOREGOING **NOTICE OF DEFENDANT'S OBJECTION TO ORDER ON DISCOVERY COMMISSIONER'S REPORT AND RECOMMENDATION** , TO THE FOLLOWING:

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

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

Electronically Filed
4/6/2021 3:56 PM
Steven D. Grierson
CLERK OF THE COURT

NEOJ
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 **NOTICE OF ENTRY OF PROTECTION ORDER AGAINST DOMESTIC VIOLENCE** Date of Hearing: April 6, 2021 Time of Hearing: 10:00 a.m.

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PLEASE TAKE NOTICE a Protection Order Against Domestic Violence was duly entered on the 6th day of April, 2021, a copy of which is attached hereto and fully incorporated herein by reference.

DATED this 6th day of April, 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
Attorney for Plaintiff, Emily Bellisario

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, and on the 6 day of April, 2021, I served by and through Wiz-Net electronic service, pursuant to Clark County District Court Administrative Order 14-2 for service of documents identified in Rule 9 of the N.E.F.C.R., the foregoing **NOTICE OF ENTRY OF PROTECTION ORDER AGAINST DOMESTIC VIOLENCE (WITH ORDER ATTACHED HERETO)**, to the following:

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

By: _____
Employee of Roberts Stoffel Family Law Group

DISTRICT COURT
Family Division
CLARK COUNTY, NEVADA

FILED IN OPEN COURT
April 10, 20 21
Steven D. Grierson, Clerk of the Court
By: Kyle Medina
Kyle Medina Deputy

Emily Bellisario Applicant

vs. Case No. T-21-2016639-T

Bradley Bellisario Adverse Party

PROTECTION ORDER AGAINST DOMESTIC VIOLENCE

Having considered the filings, testimony and evidence presented this day, and the Court having jurisdiction in this matter, and adverse party ■ was present ❑ was not present this date ❑ attorney for adverse party present, the Court hereby finds and orders as follows: The adverse party was served with notice of the hearing on _____.

_____ That the Temporary Protection Order issued in this case is *CONTINUED* in effect until the hearing date specified below, under the same terms and conditions as it was originally issued, subject to any exceptions noted below.

X That the Temporary Protection Order issued in this case is *EXTENDED* until May 10, 2022. The adverse party is ordered to stay 100 yards away from all locations the adverse party is excluded from in the Temporary Order. The adverse party is ordered to continue to obey, all of the orders, terms and conditions of the Temporary Order issued in this case subject to any exceptions noted below.

_____ That the court finds good cause to ISSUE the Temporary Protection Order immediately. That the adverse party stay away from the applicant at all times, including those places noted below, having no contact whatsoever with the applicant.

_____ That the Protection Order issued in this case is HEREBY DISSOLVED.

_____ That parties are ordered to appear at a RETURN HEARING TO BE HELD:
On _____, at _____ a.m./p.m. at:
Department: TPO, Family Court and Services Center, 601 N. Pecos Rd., Las Vegas, Nevada 89101

_____ That the ❑ APPLICANT ❑ ADVERSE PARTY shall have temporary physical custody of the minor child[ren] of the parties, subject to the visitation of the other party outlined below.

_____ That the each month the ❑ APPLICANT ❑ ADVERSE PARTY is ordered to pay to the other party $ _____, beginning _____, for the temporary support of the minor child[ren] until a permanent order for child support is established or until the expiration of the Extended Order, whichever occurs first. A wage assignment is ordered.
_____ This amount is payable ½ on _____ and _____ of the month.

X Other Orders of the Court regarding: ❑ Visitation ❑ Terms of Protection Order ❑ Other Matters ❑ Firearm[s] Addendum
Protection Order is extended until May 10, 2022 or until Criminal Case is completed.

SO ORDERED _____ _____
DISTRICT COURT COMMISSIONER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the herein Protection Order Findings and Recommendations are hereby approved. These Orders, are effective immediately. You have 10 days to OBJECT TO THIS DECISION.

(Judge's or Commissioner's initials will appear next to all orders that apply)

_____
DISTRICT COURT JUDGE

REV. 11/13

Electronically Filed
4/6/2021 3:56 PM
Steven D. Grierson
CLERK OF THE COURT

NEO
Amanda M. Roberts, Esq.
State Bar of Nevada No. 9294
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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 **NOTICE OF ENTRY OF ORDER FOR SUPERVISED VISITATIONS** Date of Hearing: April 6, 2021 Time of Hearing: 10:00 a.m.

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PLEASE TAKE NOTICE an Order for Supervised Visitations was duly entered on the 6th day of April, 2021, a copy of which is attached hereto and fully incorporated herein by reference.

DATED this 6th day of April, 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
Attorney for Plaintiff, Emily Bellisario

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, and on the 6 day of April, 2021, I served by and through Wiz-Net electronic service, pursuant to Clark County District Court Administrative Order 14-2 for service of documents identified in Rule 9 of the N.E.F.C.R., the foregoing **NOTICE OF ENTRY OF ORDER FOR SUPERVISED VISITATIONS (WITH ORDER ATTACHED HERETO)**, to the following:

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

The Notice of Entry of Order for Supervised Visitation was also sent to Donna's House via fax at (702) 388-2823.

By: _____
Employee of Roberts Stoffel Family Law Group

Send Result Report

MFP

TASKalfa 8353ci

Firmware Version 2XN_S000.002.151 2020.08.27

RS29Z00152
04/06/2021 15:40
[2XN_1000.002.102] [2NH_1100.001.002]

Job No.: 030967 Total Time: 0°01'08" Page: 004

Complete

Document: doc03096720210406153826

NEO
Amanda M. Roberts, Esq.
State Bar of Nevada No. 9294
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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 **NOTICE OF ENTRY OF ORDER FOR SUPERVISED VISITATIONS** Date of Hearing: April 6, 2021 Time of Hearing: 10:00 a.m.

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No.	Date/Time	Destination	Times	Type	Result	Resolution/ECM
001	04/06/21 15:39	7023882823	0°01'08"	FAX	OK	200x100 Normal/On

ORDR

FILED IN OPEN COURT
April 6, 20 21
CLERK OF THE COURT
By: Kyles Medina Deputy

DISTRICT COURT
CLARK COUNTY, NEVADA

Emily Bellisario Plaintiff,

-vs-

Bradley Bellisario Defendant.

Case No. D-20-605263-D

Department: P

ORDER FOR SUPERVISED VISITATION

The court finds that it is in the best interest of the parties' child(ren) that the Plaintiff's/Defendant's (circle one) visitation be supervised pursuant to this Order. Therefore,

IT IS HEREBY ORDERED that because the Court finds that the parties have not or cannot pick up and drop off their child(ren) for visitation at an agreeable location in a fashion that is safe for the child(ren) physically and/or emotionally, the parties shall utilize Donna's House services.

IT IS FURTHER ORDERED that the visitation schedule will be in effect as of (date) 4/06/21, provided BOTH parties complete orientation, for thirty (30) / sixty (60) / ninety (90) days and will occur as follows:

Visitation will occur as follows:			
Weekly / Every other week			
Wed / Thurs / Fri	Saturday / Sunday		
~~6 p.m. - 7 p.m.~~ ~~7 p.m. - 8 p.m.~~	9 a.m. - 10 a.m. 10 a.m. - 11 a.m. ~~11 a.m. - 12 noon~~	12 noon - 1 p.m. 1 p.m. - 2 p.m. 2 p.m. - 3 p.m.	3 p.m. - 4 p.m. 4 p.m. - 5 p.m. 5 p.m. - 6 p.m.

IT IS FURTHER ORDERED that the parties shall contact Donna's House at (702) 455-4229 to schedule orientation. Failure to contact Donna's House may result in the family's inability to use said services, and the Court may issue sanctions against the responsible party of parties.

IT IS FURTHER ORDERED that the cost of said services is $20.00 per supervised visitation hour:

_____ 1) Fee shall be paid equally by both parties (i.e., $10.00 per hour by each party); or
X 2) ☒ Plaintiff ☐ Defendant shall pay the whole amount of $20 per supervised visitation hour; or
_____ 3) Fee for supervised visitation shall hereby be waived.

Said payments shall be paid directly to Donna's House, 601 N Pecos Rd, Bldg B, Las Vegas, NV. Said payment shall be made no later than the date of the exchange. Failure to pay may result in cancellation of the scheduled monitored visitation and the Court may issue sanctions against the responsible party or parties.

IT IS FURTHER ORDERED that the parties shall follow all rules and directives of Donna's House. Failure to follow all rules and directives may result in the immediate termination of services and the Court may issue sanctions against the responsible party or parties. The general rules are contained on the back of this order.

Grandparents are allowed for 1st weekend only

This matter is reset for:

Date: May 11, 2021 **Time:** 3:00pm

MB
DISTRICT JUDGE / COMMISSIONER

Attorney for Plaintiff: Amanda Roberts

Attorney for Defendant: Pro Se

White: Court Green: Plaintiff Goldenrod: Defendant Revised 08/5/10

TRANS

FILED
AUG 19 2021
CLERK OF COURT

ORIGINAL

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

EMILY BELLISARIO,	)	
Plaintiff,	)	CASE NO. D-20-605263-D
vs.	)	DEPT. P
BRADLEY JOHN BELLISARIO,	)	
Defendant.	)	

BEFORE THE HONORABLE MARY PERRY
DISTRICT COURT JUDGE

TRANSCRIPT RE: ALL PENDING MOTIONS

TUESDAY, APRIL 6, 2021

APPEARANCES:

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

LAS VEGAS, NEVADA TUESDAY, APRIL 6, 2021

P R O C E E D I N G S

(THE PROCEEDINGS BEGAN AT 10:03:30)

THE CLERK: We're on the record.

THE COURT: All right. Good morning. We are on the record in case number D-20-605263-D, Bellisario versus Bellisario. Counsel, may I please have your appearance?

MS. ROBERTS: Amanda Roberts, bar number 9294, on behalf of the Plaintiff Emily Bellisario who is present along with my paralegal Colleen O'Brien (ph).

THE COURT: All right. Thank you. Sir, how are you doing? I know you are a licensed attorney. So if you want to give your appearance.

THE DEFENDANT: I was and I didn't renew. So Brad Bellisario, bar number 13452.

THE COURT: Okay. But --

THE DEFENDANT: But if it's --

THE COURT: -- you are here --

THE DEFENDANT: I know.

THE COURT: -- in proper person --

THE DEFENDANT: Yeah.

THE COURT: -- today.

THE DEFENDANT: In proper person, yeah.

THE COURT: Okay. I -- with you --

THE DEFENDANT: Yeah.

THE COURT: -- being here in proper person, I'm going to put both you and Emily under oath just in case I have --

THE MARSHAL: Go ahead and --

THE COURT: -- questions for her too.

THE CLERK: You do solemnly swear the testimony you're about to give in this action shall be the truth, the whole truth, and nothing but the truth, so help you God?

THE PLAINTIFF: Yes.

THE DEFENDANT: Yes.

THE COURT: All right. Thank you. Please be seated. We're going to be relaxed. We're going to hand -- try to handle and get a lot of stuff taken care of today. We've got a lot of time that I've set aside just for this. Thank you for coming in in person. I really do appreciate it. I get a better feel for people. They get a better feel for me when we're all in the same room. We can understand each other a lot better too sometimes.

We're here on multiple motions and multiple oppositions. And I have my list of stuff from each one of them that we are going to be taking care of so I don't miss anything since we have so much.

So on the first one, the -- let me see. This was originally filed on -- let me see. Plaintiff's motion to extend protection order, joining business, appointing receiver, deeming Defendant a vexatious litigant, consolidating a civil case to this action, modifying legal arrears to judgment, attorney's fees, which was filed on February 5th, 2021. Defendant's motion to strike hearsay and misrepresentations filed on February 9th, 2021, and opposition and countermotion for attorney's fees filed February 23rd, 2021. And it was previously taken off calendar and then re-noticed on March 2nd, 2021.

Motion to extend protection order. We had minutes in that that stated that if there were any more problems then it would be extended. And I'm -- I'm going to go ahead and grant the motion to extend it because it -- it may be something that we turn around and undo in the future. The one thing I will not do at all, sir, I will never ask you a question regarding the criminal case because it's not fair to you. You have a Fifth Amendment right and I am not going to allow any questions re -- on those things here. And the best way for me to make sure that everything is taken care of is to go ahead and grant that because I'm not going to ask you anything.

THE DEFENDANT: Right. I -- if I can say one thing

about it.

THE COURT: Yes, sir. Please.

THE DEFENDANT: If this is about the January 23rd incident -- or that I was arrested on January 23rd, that was already dropped because we proved that it was false.

THE COURT: Well, I'm not sure. All -- all I know is right now if it's been dropped, give me the paperwork. I don't have the paperwork --

THE DEFENDANT: Yeah --

THE COURT: -- for it.

THE DEFENDANT: -- but I have the paperwork showing that the TPO was -- was dissolved at that time and all that and her admitting it and her -- and her -- her testimony and grand jury admitting she dissolved it. So --

THE COURT: Ms. Roberts?

MS. ROBERTS: Yes, Your Honor.

THE COURT: Because I -- I want to take each one of these issues one --

THE DEFENDANT: Right.

THE COURT: -- at a time.

THE DEFENDANT: And I brought the paperwork for that --

THE COURT: Yeah.

THE DEFENDANT: -- subject.

THE COURT: One at a time I'm taking each issue.

MS. ROBERTS: Okay. So Your Honor, there have been three TPOs issued regarding my client's safety as it relates to Mr. Bellisario.

THE COURT: Okay.

MS. ROBERTS: So the first one is T-19-200357-T.

THE COURT: All right.

MS. ROBERTS: That application was made September 17th of 2019.

THE COURT: What was that TPO number?

MS. ROBERTS: T-19-200357-T.

THE COURT: Wow, I don't even have that on this list.

MS. ROBERTS: So what happened in that one is that the Hearing Master did not have all the information. She did that when he was originally -- when original incidents happened September 17th of 2019.

THE COURT: Okay.

MS. ROBERTS: She then went to Safe Nest or SAFE House. And then they helped her fill out another application on September 18th of 2019. That is T-19-200404-T.

THE COURT: Okay. I think that one I do have.

MS. ROBERTS: Granted September 18th of 2019, served on him noon that day, extended on September 17th of 2000 --

1 til September 17th of 2020. He has alleged that that
2 temporary protective order was dismissed. He has provided to
3 the criminal court as well as this court a document that was
4 filed by Mr. Tilman that was never signed by my Coun -- my
5 client or Counsel. That TPO has a number in it that is not a
6 TPO number. We have no clue where that TPO happened.
7 THE COURT: Well, I'm --
8 MS. ROBERTS: Then we have T-20-206639-T. That
9 application was made July 6th of 2020 and granted. It was
10 served on Mr. Bellisario July 8th of 2020 at 1:35 p.m. The
11 extension was granted July 30th of 2020 and that's the one
12 we're here on right now. That one is set to expire May 10th
13 of 2020. The one that they filed --
14 THE COURT: 2020 --
15 MS. ROBERTS: -- for the ex --
16 THE COURT: -- or 2021?
17 MS. ROBERTS: 2021. I'm sorry, Your Honor.
18 THE COURT: Okay.
19 MS. ROBERTS: I'm sorry. The TPO that Mr.
20 Bellisario alleges was dissolved, this is the case number
21 that's on that document. 051569. It is not a case number
22 that I can find in Family Court at all. And I have looked
23 extensively --
24 THE COURT: Let me --

MS. ROBERTS: -- at that.

THE DEFENDANT: This is --

THE COURT: Okay.

THE DEFENDANT: -- what the -- the state filed in discovery. It has the -- the case number that's listed on that document. It's the one they gave to me in jail --

THE COURT: Oh, I can --

THE DEFENDANT: -- and it's the --

THE COURT: Okay.

THE DEFENDANT: -- T-19-200.

THE COURT: That's -- that -- that's the one that the jail will automatically do it's -- in just a very short period of time. Let me take a look at it. Because I may be able to pull it up in here.

MS. ROBERTS: I've never seen that, Your Honor.

THE COURT: Let me -- what am I looking at here? I got to pull up the right screen. I got to move some screens around here so that I've got -- okay. This looks like -- no, this did not come from the Family Court.

THE DEFENDANT: That's -- that's what they gave me. That was the -- the original I guess before they extended it because that's the only TPO that there was. That was -- that was filed in the -- the criminal case I believe. It's -- well, that was what they gave us in discovery, something they

filed.

MS. ROBERTS: Mr. Bellisario's current criminal case, the one that he was arrested on January, is not related to any -- is not related to the Court's TPO, Your Honor. That TPO is the T-21. I'm sorry, part of it is that they -- Ms. -- I believe what happened, and they've amended their complaint repeatedly, the Court has been given that information, is that they originally put the T-19-200414-T and they've corrected that now to T-20-206639-T.

THE COURT: All right.

MS. ROBERTS: And all of those TPOs, the T-19-200414-T was ne -- was never dissolved or dismissed as Mr. Bellisario alleges. And T-20-206639-T remains effective today.

THE DEFENDANT: Right now it's --

THE COURT: Yeah. The -- Mr. Bell -- the -- the one thing that I know, Mr. Bellisario, is -- and -- and I have looked at all of the -- all of the T cases that we've got here. And all of these T cases, the one end -- that ends in 63 -- not 639. Is it 639? Let me get back to that screen.

MS. ROBERTS: 639 is the current one, Your Honor.

THE COURT: Yeah, the 639. 2 -- 206639-T, that one is still active.

THE DEFENDANT: Right. The one that was issued July

of 2020.

THE COURT: Correct.

THE DEFENDANT: Correct.

THE COURT: That one is still active. They tend to not put multiple TPOs out because the one --

THE DEFENDANT: Right.

THE COURT: -- you know --

THE DEFENDANT: Which is what I'm saying the -- the previous one was dissolved --

THE COURT: Yeah.

THE DEFENDANT: -- and we have the Court document from the TPO court stating she admitted to dismiss or dissolve the TPO. That's in the --

THE COURT: May --

THE DEFENDANT: -- court --

THE COURT: -- see that, please?

THE DEFENDANT: Yeah, it's in the court order. It is --

MS. ROBERTS: So we're clear, Your Honor, that was heard by Hearing Master and they did not note that. This was in relation to an order to show cause. It does not state that it was dissolved or dismissed. And there is no order in the T-200404-T that does that. Mr. Tilman got an ex parte order, I believe it's what Mr. Bellisario has handed to you, that had

that case number in it. The 051569, that was attached as exhibits to Mr. Bellisario's document. And I had to go essentially play detective to figure out what that is. I don't know where Mr. Tilman got that information, but that is not an active case that was ever involved with these parties unless it was issued in the J case, because the J case is who signed the ex parte order that Mr. Tilman drafted.

THE COURT: Okay. I'm sitting here. I'm looking at T-19 --

MS. ROBERTS: Yep.

THE COURT: -- 200404.

MS. ROBERTS: Yep.

THE COURT: This was filed March 12th, 2020 --

MS. ROBERTS: Yes.

THE COURT: -- on this paperwork, but in the case itself -- let me look and what -- it's -- here it is. Applicant filed a statement in support of her motion which states that she agreed to drop the order. Applicant motion is denied.

MS. ROBERTS: But the order --

THE COURT: There were a lot of --

MS. ROBERTS: -- was never --

THE COURT: -- arguments --

MS. ROBERTS: -- dissolved --

THE COURT: -- regarding --

MS. ROBERTS: -- or dismissed.

THE COURT: -- custody.

MS. ROBERTS: That's okay.

THE COURT: Hold on. I'm -- I'm reading everything.

MS. ROBERTS: That's okay.

THE COURT: I -- I know I've read this once before, but I'm doing it a second time. To -- you know, that's why we've got as long as we have today. Okay. It was signed by America Andradi (ph) and then Judge Duckworth.

Okay. So this one was dissolved.

MS. ROBERTS: It was not --

THE COURT: But we --

MS. ROBERTS: -- Your Honor --

THE COURT: -- still have --

MS. ROBERTS: Your Honor, it was not dissolved. If you go and look at the actual case, although she made that statement, if -- if you look at it, they actually never checked the correct boxes. And the order was never issued to dissolve it. You have to go and look at the actual pleadings in the register of action. It never happened. So whether that is through fault of the Hearing Master or the --

THE COURT: Yeah.

MS. ROBERTS: -- J case --

THE COURT: See, I'm going to have to -- I'm going to make an assumption even though, you know, we know what assume means. But it was not extended. So it wasn't --

MS. ROBERTS: That is true.

THE COURT: -- necessarily dissolved.

MS. ROBERTS: It was --

THE COURT: It was not extended.

MS. ROBERTS: Correct. That is --

THE COURT: Okay.

MS. ROBERTS: That is a correct statement.

THE COURT: That is why we have another one at 6:39, because this was on March 20 -- March 2021. And then the 204 -- let me see. I mean, this -- this case is just riddled with TPOs. And that's what makes it so hard. Well, let's -- let -- let's just get right down to it. We have one right now and I just can't believe I signed that out. The -- the active one now is T-20-60 -- 206639-T.

MS. ROBERTS: Yes, Your Honor.

THE COURT: That is the one that is active right now. That is the one that at this point is going to be extended until we can -- un -- until all of your criminal cases are taken care of or May 2022. If your criminal cases come back, you're found not guilty, I have no problems with revisiting it. But as I said earlier, I am not going to ask

you any questions that is going to put you in the position where you -- you may slip and answer something that's going to mess it up over there. That's way too serious. Okay. All right. Here is -- is that the only -- there's all three pages that he gave you. Oh. Okay, I found it in right place. My eyesight's not necessarily working. All right. Joining Bradley's business as a party, I believe --

MS. ROBERTS: We skipped --

THE COURT: -- we already did that.

MS. ROBERTS: We skipped over one, Your Honor. The clerical error. The order from July 30th of 2020 I accidentally put 2020 instead of 2019. The video record is clear. So under 60(b) -- or 60(a) the Court can correct the clerical error in that order.

THE COURT: Okay. All right. We -- we will grant that because it is a clerical error. It's just for that one number. Do you have any -- do you have an objection to this, sir?

THE DEFENDANT: No, I have -- I just have motion here for relief from the orders, but I don't have any objection to the --

THE COURT: Okay.

THE DEFENDANT: -- correcting --

THE COURT: Yeah.

THE DEFENDANT: -- a clerical error, so --

THE COURT: So we will -- when -- when I get to that one, we --

THE DEFENDANT: Yeah.

THE COURT: -- will discuss that one as well.

THE DEFENDANT: That's fine.

THE COURT: Okay. And like I said, I've -- and I've kind of got a check sheet here. I think we might have missed that one because I don't remember reading about the clerical problem. All right. Joining the business as a party. I believe I have already granted that order, didn't I?

MS. ROBERTS: It was not granted.

THE COURT: Yeah.

MS. ROBERTS: We filed it and it still has not been heard.

THE COURT: Okay. All right. The -- I don't know if we have to because isn't it a community property? E -- even though it's a --

THE DEFENDANT: It's still --

THE COURT: -- law practice and she cannot really be own -- owning a portion of it because she's not an attorney but it's still community property, correct?

MS. ROBERTS: Correct. Pursuant to 123.220.

THE COURT: Yeah.

THE COURT: So --

THE DEFENDANT: I would say --

THE COURT: -- doesn't --

THE DEFENDANT: -- it's not because it start --

THE COURT: -- that open it up to discovery anyway even if we don't join it?

MS. ROBERTS: The problem, Your Honor, is that what has happened is we have tried to do discovery and now the motion for protective order we've gone without a judge for five months. It needs to be joined so that Mr. Bellisario has allegedly closed that practice now. It is absolutely relevant to the issues regarding spousal support and child support and community assets. It needs to be joined so that somebody can manage that business and any funds that are owed to clients can be paid out and there can be full compliance with the rules.

THE DEFENDANT: Your Honor, it's been closed. There is no money in the business and I didn't renew my license. So I don't know what you want to say.

THE COURT: Why didn't you renew your license?

THE DEFENDANT: Because going through all this, like she was mentally abusive during marriage and now this stuff, I can't do it. Like my nerves, I cannot practice. So I haven't been able to. So we've got everything figured out. I sent

everything I could to -- to get things done. The clients are done. There's no money left. So --

THE COURT: I mean, I can see where your -- where -- where you wouldn't be running your own business because it would be too big of a headaches. But, you know --

THE DEFENDANT: I -- I didn't have --

THE COURT: -- I --

THE DEFENDANT: -- anybody working --

THE COURT: You're --

THE DEFENDANT: -- under me or anything. It was just me. So --

THE COURT: Yeah.

THE DEFENDANT: -- I don't have anything --

THE COURT: Oh, I can -- I can --

THE DEFENDANT: -- else to do.

THE COURT: -- understand that, but why not just go to work for somebody else and then all you have to do is just --

THE DEFENDANT: Because I have to --

THE COURT: -- raise the stress --

THE DEFENDANT: -- spend all --

THE COURT: -- too much.

THE DEFENDANT: -- my time trying to figure out how to see my children or how to do this. And I end up just like

shaking all day and I can't function. So I don't know what --

THE COURT: Okay.

THE DEFENDANT: But I can't practice.

THE COURT: All right. All right.

MS. ROBERTS: So in order to --

THE COURT: There's probably not -- not a business, but I am -- I -- I will go ahead and grant it.

MS. ROBERTS: Okay.

THE COURT: We're also going to go ahead and appoint a receiver on there, even though there may not be anything there.

THE DEFENDANT: Okay. And I can't pay for that --

THE COURT: But we --

THE DEFENDANT: -- so --

THE COURT: -- we need an audit on the trust account to -- to see --

THE DEFENDANT: Well --

THE COURT: -- exactly --

THE DEFENDANT: -- there's protective --

THE COURT: -- what's there.

THE DEFENDANT: -- or -- there's a -- there's a motion for protective order on that right now.

THE COURT: I -- I realize that. And we are going to take that a little bit out of turn. That's why I -- I'm

not going to turn the trust account over, but I am going to appoint somebody to do an audit on it.

THE DEFENDANT: Okay.

THE COURT: Okay. You know, you do still have the attorney conf -- confidentiality that goes along with the trust accounts.

THE DEFENDANT: Right.

THE COURT: So to -- to me, you know, and -- and I've -- you know, and I've discussed this with quite a few other people, you know, and this is the best way to go about doing it, you know, we appoint other people besides your wife to look over this stuff. And that way it keeps the confidentiality. The receiver needs to be an attorney. The person who's doing the audit is a CPA. You know, we're -- we're going -- we're going to stick with the rules. So, I mean, you -- it has to be an attorney who deals with trust account.

THE DEFENDANT: Okay.

THE COURT: But it requires a CPA to do the audit.

THE DEFENDANT: And I have no income and no ability to pay for it. So if they want it --

THE COURT: And --

THE DEFENDANT: -- I think --

THE COURT: Well, that was --

THE DEFENDANT: -- they should pay for it.

THE COURT: -- going to be my next deal. Who's going to pay for it?

MS. ROBERTS: Your Honor, there's already been a finding that Mr. Bellisario has the ability to earn $18,000 per month.

THE DEFENDANT: That's not --

MS. ROBERTS: He is volun -- he has --

THE COURT: If he's not paying for it though, you know, these people aren't going to work without any money coming in. That's the problem. Is there a house?

MS. ROBERTS: My client owned a house prior to the marriage.

THE DEFENDANT: It's --

THE COURT: Okay.

THE DEFENDANT: I also paid for it, so it's --

MS. ROBERTS: That would be a trial issue. Mr. Bellisario has an absolute obligation based upon the findings and the orders of this Court to maintain employment. And if -- if we have to, then I will find a way to pay -- have my client pay for the receiver and the CPA subject to reallocation by Mr. Bellisario. I would ask that I just give him three names and he select one within 48 hours --

THE COURT: Okay.

MS. ROBERTS: -- for both of those. And I -- I would also note as it relates to the protective order, Your Honor. There is already an order that he is required to give me those records so that I can audit them. I am an officer of the court. That was done in October and November of 2020; therefore, I think that as an officer of the court and the court protected those records, I am able to look at those IOLTA statements for the purpose of protecting my client's interest in that asset.

THE COURT: Okay.

THE DEFENDANT: First of all, I think she's -- the order that she's referring to from October didn't exist until January 21st when she had me arrested. And then she filed it so I couldn't file for a rehearing or anything like that or file for anything. So that's why I filed the motion for NRCP 60 relief. The findings of fact she's alluding to is from July 30th which I filed for relief from because that's not a findings of fact that Judge Pomrenze would have found. It's just things that Amanda throws in to try and manufacture facts.

And I -- I did the -- the liberty of pulling the last 300 cases by Roberts Stoffel Law Group. They do this multiple times. They don't file orders for months so you can't enforce anything. Then she puts in facts that aren't

1 actually findings of fact. There is a -- a case from
2 Jimmerson who -- I think it was five years ago. They called
3 that exact things out. She just pushes things in to try and
4 get it past you because she doesn't pass the orders to you,
5 get it in as a fact, and then says oh, it's a finding of fact.
6 It was never a finding of fact.
7 MS. ROBERTS: The Judge signed off on the order with
8 the findings of fact and conclusions of law and the order
9 itself.
10 THE DEFENDANT: Right. And -- well, she never
11 passed to me and she only filed once I was incarcerated so I
12 wouldn't have the ability to do it.
13 MS. ROBERTS: They went to Mr. Tilman. He was the
14 attorney of record. Mr. Tilman refused to sign off on them.
15 So then pursuant to the rules they were submitted to the
16 court.
17 THE DEFENDANT: Pursuant to the rules, she should
18 have done that within X amount of days. She waited three
19 months to do it until I was incarcerated.
20 THE COURT: Well, she waited for three months.
21 Whether you were incarcerated or not is not her fault. She --
22 but, you know, the -- the --
23 THE DEFENDANT: I believe it was --
24 THE COURT: -- orders --

THE DEFENDANT: -- actually, so --

THE COURT: -- were not timely and it was the fault of somebody in which you hired because --

THE DEFENDANT: No, it wasn't.

THE COURT: -- it wasn't done --

THE DEFENDANT: She never --

THE COURT: -- within the 20 days.

THE DEFENDANT: She didn't provide it for a month after the hearing.

THE COURT: Okay.

MS. ROBERTS: Your Honor --

THE DEFENDANT: But if you look at her cases, if it's something in her favor that she needs done right then and enforced, she will file the next day.

MS. ROBERTS: So the July order, Your Honor, we were supposed to have a meet and confer which I attempted to do with Mr. Tilman's office to cra -- calculate the child support obligation. Mr. Tilman's office didn't do that. We then prepared it with the information given to the court, sent it again to Mr. Tilman. No signature, submitted it to the court.

As it relates to October, I believe that's the one that did not have any court minutes even prepared for it. If I -- if I recall, I mean, there's a lot of information in the motion. If the Court wants me to find it, I will. That one

still does not have court minutes prepared for it. We had to go back and use the video to do it. We then gave that one to Mr. Tilman and Mr. Tilman didn't sign. So that one had to be submitted to the court. And then the one in December was submitted directly to the court per -- as permitted by the rules and the Court -- essentially what happened is Judge Pomrenze was not signing off on the orders so they sat for a very long time in --

THE DEFENDANT: That's --

MS. ROBERTS: -- order to be granted and signed off on.

THE DEFENDANT: That's not true. When she submitted the order, she dates them. They were dated January, not dated in October of whatever. It wasn't like she submitted them and they sat in Judge Pomrenze's office. She --

MS. ROBERTS: There --

THE DEFENDANT: -- never sent them.

MS. ROBERTS: There was actually an error in one of them that the law clerk caught for the court and asked me to revise it which I --

THE COURT: Correct.

MS. ROBERTS: -- did and resubmitted it to the court using that. And -- and I'm sure that I signed the date on it because it was resubmitted to the court using the corrected

information.

THE DEFENDANT: And even in July 30th --

THE COURT: I actually have something in here that will tell me when things get kicked back because our computer system is -- is very, very interesting. If I can pull it up on the right deal here. Wow. Okay. The -- the proximate timeline, if I can get to the right one here, all right. 11/25/2020, order from hearing logged at -- into Department. Order from 10/22. Then it was -- let me see. 11/25, order from a hearing logged in to Department 11/24. It was submitted to Court Clerk Jay Rouse (ph). The first -- the other one was M. Loyola (ph). Order from hearing logged into Department, 11/24 hearing. So it was the day after the hearing.

It was submitted by Mr. Tilman. The other two were by Ms. Roberts. Order from hearing logged into Department 7/30/2020. So that took awhile for that one to come through.

MS. ROBERTS: That's the one that required the meet and confer with Mr. Tilman. That --

THE COURT: Correct.

MS. ROBERTS: -- never happened, Your Honor.

THE DEFENDANT: That I don't think she ever tried to do, but --

THE COURT: Well --

1 THE DEFENDANT: She provides no proof of anything
2 when it's convenient for her. She just claims it, you know.
3 So --
4 THE COURT: It's -- it -- it -- those things, you
5 know, since -- since it has been too long since I've been
6 practicing with the same people that she has that's, you know,
7 I am -- I am going to contact notice. It's hard to take -- to
8 meet and confer with attorneys who do a lot of track work. So
9 that -- that I do know is a good possibility. The --
10 MS. ROBERTS: That is actually the order that was
11 rejected. And --
12 THE COURT: Yeah.
13 MS. ROBERTS: -- the Court asked me to revise it and
14 return it. So that was the one that was revised and
15 returned --
16 THE DEFENDANT: Several months later, wasn't it?
17 MS. ROBERTS: It -- no, it was rejected --
18 THE COURT: Yeah.
19 MS. ROBERTS: -- in January and resubmitted January
20 22nd --
21 THE COURT: Yeah. Well --
22 MS. ROBERTS: -- based upon the Court's
23 instructions.
24 THE COURT: And we also had one that was corrected

and resubmitted on 12/11/2020. A lot of these orders may have been submitted a lot sooner, but they set in that queue with another 2000 orders.

THE DEFENDANT: But the issue --

THE COURT: Yeah.

THE DEFENDANT: -- is she went -- she didn't submit those on purpose because January 24 --

THE COURT: It's not on purpose, sir.

THE DEFENDANT: Well, January 24.

THE COURT: I just -- sir, don't argue with me first of all.

THE DEFENDANT: Well, I'm just trying to --

THE COURT: Okay?

THE DEFENDANT: -- make a --

THE COURT: I understand that, but I'm sitting here. I just went through this here. Most of these orders were submitted the first time around almost immediately. And it's -- it -- it's right here in this computer. It says when they were submitted. I read it out to you on the notes and when it said that.

THE DEFENDANT: Well, the only thing I was trying to say was the November 24th order is what Judge Pomrenze said we're going to confirm all the other orders which have never been ordered or given me a chance to do anything with. So

that's why she got it in the next day without passing it to me. And then I had an email from Colleen --

THE COURT: Did you --

THE DEFENDANT: -- O'Brien --

THE COURT: -- have an attorney on that day?

THE DEFENDANT: No.

THE COURT: Because everything in here up to a certain point show -- shows that you had Tilman.

THE DEFENDANT: Right. Which --

THE COURT: When did you --

THE DEFENDANT: -- we --

THE COURT: -- dismiss Tilman?

THE DEFENDANT: That was in October we did. We did the -- in during court with Sandra Pomrenze we did that. And then for whatever reason she wouldn't -- she didn't address it. Like he had the motion before the October hearing and she didn't address it then. And she only addressed it in November. And then at the beginning of that hearing, she said it was dismissed.

THE COURT: Okay. Well, both Tilman and Roberts submitted an order November 2020. So you had them until November. Or as he would not have been submitting orders.

THE DEFENDANT: I don't know what order that was, was --

THE COURT: Well, I -- I read it off a couple minutes -- a couple minutes ago. Let me see. 11/25 he submit -- okay. That was his order withdrawal. Sorry. From 11/24. So he was your attorney up until 11/24.

THE DEFENDANT: Right, but we had already had that in. Nothing was going on because I couldn't pay him. That was the issue. So I was -- and now the -- the order that they submitted on the 25th, I got an email from Colleen O'Brien saying the Judge told us to give it directly to her.

THE COURT: Okay.

THE DEFENDANT: That wasn't true. That never happened.

THE COURT: All right. I'm still going to appoint -- appoint a receiver.

MS. ROBERTS: That's fine, Your Honor. So --

THE COURT: And -- and the -- the mon -- the monies is going to -- you know, you're going to have to come up with a way. And if it comes out where money is hidden somewhere where you can trace and find where it is, we'll go from there. They may not be any money.

THE DEFENDANT: There's --

THE COURT: There may not --

THE DEFENDANT: -- $96.

THE COURT: -- be any money and this may be just

spinning wheels. And we will deal with that when we come. He may have -- if -- if he's -- you know, but I do agree. Sir, you paid your dues this year. You're still active. That's --

THE DEFENDANT: I -- I --

THE COURT: -- what the State Bar says.

THE DEFENDANT: I didn't pay my dues. I can show you the email that I told them to suspend me on appearance.

THE COURT: And but the State -- the -- the State Bar website still has you as active.

THE DEFENDANT: I know. I've -- I've been emailing with them --

THE COURT: So, you know, right now that's all I can tell you. You need to be working though even if it's -- even if it's at Lowe's in the plant department. Okay. You need to be working. How are you supporting yourself right now?

THE DEFENDANT: My parents.

THE COURT: Your parents? Are you living with your parents?

THE DEFENDANT: No.

THE COURT: So they're --

THE DEFENDANT: I --

THE COURT: -- paying your rent and everything else like that?

THE DEFENDANT: Yeah. I mean, they've been staying

with me to help with custody exchanges because I don't want to see her. So my mom had been living with me for the past year-and-a-half almost. Now she went back home.

MS. ROBERTS: As --

THE COURT: Yeah.

MS. ROBERTS: -- for this --

THE COURT: I mean, you can even work as a paralegal. So there's a -- there's a lot of jobs that you can do. And from the writing that I have seen, you -- you do a very good job. So, you know, there's a lot of work that you can do. So you need to find a job.

MS. ROBERTS: As it relates to the receiver, Your Honor, and the CPA, three name -- can I give him three names and within 48 hours he picks one of the three names

THE COURT: Yes.

MS. ROBERTS: Okay.

THE COURT: And if he -- and if he does not do that -- let me see. What -- do you -- do you have the list of the three names right now?

MS. ROBERTS: I don't have them with me. I don't have them --

THE COURT: Put them in alphabetical order and the -- and the middle one would be the one if he doesn't pick one.

MS. ROBERTS: Okay.

THE COURT: I -- I can't think of any other way of choosing one other than saying it that way. The -- if -- if the -- no, if his practices goes down, I'm -- you know, I'm not sure. You know, maybe the auditor can find everything and save a little bit of money and let the audit take place first. And then we find out if there is any money that's owed and then they can start going after that money that's owed.

MS. ROBERTS: So Your Honor --

THE COURT: Any money that is found will go into your IOLTA account.

MS. ROBERTS: Okay.

THE DEFENDANT: Yeah. I mean, I'll tell you right now. There's $96 in the IOLTA account and then the regular account was negative. So we got closed out. So --

THE COURT: So -- so why have you not been turning those records over?

THE DEFENDANT: I tried to in the last set but they -- because they closed the account, I couldn't get the records online. So I have to make an appointment with the bank.

THE COURT: So you --

MS. ROBERTS: Hence the --

THE COURT: -- have to subpoena.

MS. ROBERTS: -- reason I've done my subpoenas and that he's asked for an protective order. I'm -- so I would

ask that I --

THE DEFENDANT: No, I asked for the protective order on -- as opposed -- as it goes to the trust account because the only reason they're trying to do that is to get after my clients because any reasonable request she didn't ask for the trust accounts because she knows she can't get them.

MS. ROBERTS: I can --

THE DEFENDANT: So --

MS. ROBERTS: -- get the trust account, Your Honor.

THE COURT: Okay.

MS. ROBERTS: It was specifically ordered by the court.

THE DEFENDANT: It was not, so --

MS. ROBERTS: Your Honor, I would ask that you ask him not to interrupt me.

THE COURT: Please.

THE DEFENDANT: That's fine.

MS. ROBERTS: So Judge Pomrenze's order on October 22nd that he's supposed to turn over all books and records --

THE COURT: Yeah.

MS. ROBERTS: -- and then on -- on November 24th, she again ordered books, records, statements to be turned over to me on December -- by December 1st. That still hasn't happened. We went to the Discovery Commissioner two or three

weeks ago. He was ordered to provide all the documents. He has failed to do that. I did a --

THE COURT: Okay.

MS. ROBERTS: -- detailed letter pursuant to 5.602 and we have another hearing before the Discovery Commissioner on those issues tomorrow. But the subpoenas are absolutely relevant to the issues --

THE COURT: They are.

MS. ROBERTS: -- present in this case --

THE COURT: They are.

MS. ROBERTS: -- Your Honor.

THE COURT: Okay. I need you to turn those stuff over. Please work with --

THE DEFENDANT: Yeah, I -- I --

THE COURT: -- me on this --

THE DEFENDANT: I'm --

THE COURT: -- because I can't work with you if you're not going to work with us. I cannot.

THE DEFENDANT: No, that's why I was trying --

THE COURT: Okay.

THE DEFENDANT: -- to get the records and it wouldn't --

THE COURT: All right.

THE DEFENDANT: -- let me do it online. That's --

THE COURT: Here --

THE DEFENDANT: -- I couldn't --

THE COURT: The -- the --

THE DEFENDANT: -- do it.

THE COURT: But you can't do it online but you can go in person and do it.

THE DEFENDANT: Right.

THE COURT: Okay. So get the -- get -- get it turned over. You've got a very short period of time because it's about to get you in a very dangerous position where all your pleadings are going to be stricken from the record and we don't want that. And I want you to be able to move forward. Trust me, I've had a case similar to this --

THE DEFENDANT: I -- I --

THE COURT: -- on the other side of her. She's vicious.

THE DEFENDANT: I understand that --

THE COURT: Okay.

THE DEFENDANT: -- and that's why I'm saying I spent all my time trying to figure out how I can see my kids --

THE COURT: Well --

THE DEFENDANT: -- but I'm being punished with that --

THE COURT: -- right now --

THE DEFENDANT: -- because --

THE COURT: -- you -- the best way for you to be able to see your kids is by following orders.

THE DEFENDANT: I have been following --

THE COURT: Sir --

THE DEFENDANT: -- orders.

THE COURT: -- no, you haven't or else she would have these records. She would have had these re -- because these records were --

THE DEFENDANT: She didn't --

THE COURT: -- requested before --

THE DEFENDANT: -- file an order though.

THE COURT: -- you started doing all this, so --

THE DEFENDANT: That's the thing. She didn't file orders.

THE COURT: Okay.

MS. ROBERTS: May I send my subpoenas, Your Honor?

THE COURT: Yes, send your subpoenas. Actually, it may be easier to do it that way. It may be quicker, because, you know, send your subpoenas. Now there is one thing though.

MS. ROBERTS: Yes.

THE COURT: They're not to be shared --

MS. ROBERTS: I understand.

THE COURT: -- with your client. They're -- an the

clients are not to be harassed in any way. If I --

MS. ROBERTS: Abso --

THE COURT: -- find out these clients are being harassed, then, you know, then -- then there's going to be sanctions on that one.

MS. ROBERTS: Absolutely, Your Honor.

THE COURT: Okay. I -- I will protect clients. And, you know, it's -- clients are supposed to be kept confidential. It's a confidentiality deal. So we're going to -- we are going to cover that.

MS. ROBERTS: Absolutely, Your Honor.

THE COURT: Okay. And so you -- you may --

MS. ROBERTS: So I can update -- so today is the 6th.

THE COURT: Today is the 6th.

MS. ROBERTS: So I have to give them 14 days from today. So I'll put a date in --

THE COURT: Which bank is it? Because if it's Wells Fargo --

MS. ROBERTS: There's --

THE COURT: -- it's going to be a lot longer than that.

MS. ROBERTS: There --

THE DEFENDANT: It's Wells --

MS. ROBERTS: And -- and I --

THE DEFENDANT: -- Fargo.

MS. ROBERTS: They have been asking for extensions because of COVID, Your Honor.

THE COURT: Yeah.

MS. ROBERTS: We subpoenaed a multitude of banks because there are a multitude of records --

THE COURT: Okay.

MS. ROBERTS: -- that we found. But I'll give them a date in mid May. Is that sufficient --

THE DEFENDANT: Yeah.

MS. ROBERTS: -- for the --

THE DEFENDANT: It's --

MS. ROBERTS: -- Court? Because I'm going to have to update the subpoenas to be able to send them because the dates have already past because of the protective order.

THE DEFENDANT: It's only Wells Fargo.

THE COURT: Okay.

THE DEFENDANT: I don't have any other banks.

THE COURT: Yeah, mid -- mid May is good. What date -- what date do we have so far on our trial?

MS. ROBERTS: We don't have a trial date.

THE COURT: Okay. Good. Good. We're not bumping up real close to that.

MS. ROBERTS: So the protective order, Your Honor, we have -- we have done multiple subpoenas. So we have done Nevada State Bank, Bank of Nevada, Bank of America, Chase, and Wells Fargo.

THE COURT: Okay.

MS. ROBERTS: So I will select a date.

(COUNSEL CONFER BRIEFLY)

THE COURT: Now, we know Wells Fargo is going to sit there and say we need more time.

MS. ROBERTS: I -- and they're --

THE COURT: We already know that.

MS. ROBERTS: -- all requesting more time --

THE COURT: Yeah.

MS. ROBERTS: -- right now.

THE COURT: Yeah, we know they're going to do that. So the -- the motion for the protective order is denied right now so that way they see that this has been heard. The -- these -- these are records that need to be looked at. I would feel -- I would feel a lot more comfortable if it was the receiver, the auditor, who was doing the looking. I would feel a lot more comfortable for that. And then him --

MS. ROBERTS: I'm not going to give him --

THE COURT: -- giving a report.

MS. ROBERTS: I -- I understand. May -- I'll put

1 the new subpoena dates as May 14th. That's -- that would
2 gives us sufficient time under the rules for them --
3 THE COURT: Okay.
4 MS. ROBERTS: -- to respond because --
5 THE COURT: Fantastic.
6 MS. ROBERTS: -- I'm going to have to revise them.
7 THE COURT: Yeah.
8 MS. ROBERTS: Okay.
9 THE COURT: But I -- I also know that the statements
10 will not give the client names.
11 MS. ROBERTS: It will not.
12 THE COURT: So it -- but it will give the monies as
13 received and where the monies were spent. So, oh, my. It's
14 killing me now. Okay. All right. I am not going to deem Mr.
15 Bellisario a vexatious litigant. He has a right to fight this
16 case with everything that he has. I just wish he would, you
17 know, provide the documents so that we can do this in a
18 smoother manner. It would make it so much easier. So the
19 vexatious litigant, we're -- we're denying that.
20 I am not going to consolidate the civil case into
21 the divorce action. It's, you know, we could, but I'm not
22 going to do it. You know, it needs to be where it's at right
23 now.
24 The --

MS. ROBERTS: So Your Honor --

THE COURT: -- modification --

MS. ROBERTS: -- can I be -- oh, sorry, can I be heard on that?

THE COURT: No.

MS. ROBERTS: Okay.

THE COURT: Your time -- you know, I would have to see the jury and all of this other stuff and we have a huge headaches on this. It's -- this is probably going to turn into a huge trial. Let the Court who has actually got a place for a jury to sit handle that.

MS. ROBERTS: Okay. We will be probably moving then -- all of the cases be moved downtown including this one just so the Court's aware. I have to some --

THE COURT: The -- the -- okay. The -- the -- then I am not sure which judge that you would be doing that.

MS. ROBERTS: I understand, but there are civil counsel representing multiple alleged defendants and we have all discussed this. So that will be probably the next step just so the Court's aware.

THE COURT: Well, you know that the Family Court has exclusive jurisdiction over divorce cases.

MS. ROBERTS: I understand, but that's why --

THE COURT: So it would have to -- you know, I

really don't think you're going to get the D case down there.

MS. ROBERTS: Okay.

THE COURT: And trust me, I would love to get rid of this headache, but, you know, it's a -- it's -- it's a -- it's a headache that I will handle gently.

The modification of legal custody, what is the legal custody right now?

MS. ROBERTS: It still remains joint legal custody. But what's happened with regard to that is that Mr. Bellisario has now filed two separate lawsuits against the child's therapist. As a --

THE COURT: Okay.

MS. ROBERTS: -- result, both therapists have withdrawn even though there is an order that the therapist is supposed to remain in place specifically related to Brayden. So as -- as it relates right now, my client cannot get the child the help that he needs because Dad continues to file these civil lawsuits and then the therapist will not treat Brayden.

THE DEFENDANT: There is a therapist that we agreed to have him go to, and he was going to. And I actually reached out and said can you see if Brayden can get in -- get in because I have no idea if he's okay after his trip to the hospital and all that stuff. And he found that Mom was doing

these things that would either perpetuate alienation or start alienation and she refused to take him there.

If there's someone we can agree to, I'm fine with him going somewhere. But the purpose of the last two therapists that they're talking about was she took him there for purposes of litigation to get a finding that she wanted, so --

MS. ROBERTS: We did not, Your Honor. We went to Mr. Ponzo for reunification. So he cannot have a dual role in the case --

THE COURT: He can't.

MS. ROBERTS: -- and do anything else. So therefore the child needs to be at the therapy. Mr. Bellisario continues his behavior by filing civil lawsuits. So it's now two therapists who had to withdraw and there's a specific order in place that said he would remain in therapist.

THE COURT: Why are you filing lawsuits?

THE DEFENDANT: Well, the first one she misrepresented her role what she was doing to me. And then she misrepresented -- well, the scope of what it was and then she made a finding of let's give Mom custody of these dates. Let's do this. So like that's not your job. You cannot do that. And then she would argue with me on that. And there was a whole back and forth of what --

THE COURT: Do you have that in writing where the --

THE DEFENDANT: Yes.

THE COURT: -- was saying that?

THE DEFENDANT: Yes.

THE COURT: Where is it?

THE DEFENDANT: I have it in my emails. I can get it to you, so --

MS. ROBERTS: So under 16.2, all of this should have already been produced --

THE COURT: Yeah.

MS. ROBERTS: -- to me.

THE COURT: All of that --

MS. ROBERTS: Mr. Bellisario --

THE COURT: -- should have been produced.

MS. ROBERTS: -- gives me nothing, Your Honor. I've --

THE DEFENDANT: I mean --

MS. ROBERTS: -- received very little documents.

THE COURT: Sir, the -- I mean, beauty of this case with you being in proper person is you're an attorney. You know the rules. So why --

THE DEFENDANT: I --

THE COURT: -- haven't you turned in this stuff over?

THE DEFENDANT: Because there's so much stuff that you --

THE COURT: It's --

THE DEFENDANT: -- don't understand. I know.

THE COURT: -- 16.2.

THE DEFENDANT: But there's --

THE COURT: You turn it over.

THE DEFENDANT: I understand that. What I'm saying is I've been mentally abused by this woman for six years.

THE COURT: Well --

THE DEFENDANT: Trying to --

THE COURT: -- you know what --

THE DEFENDANT: -- deal with this --

THE COURT: Here --

THE DEFENDANT: -- stuff is --

THE COURT: Here's what I want to do. I -- I -- yeah, and I'm not sure how we're going to be able to go about affording this. I think it is time we have an outsource evaluation with a full psych eval on both parties.

MS. ROBERTS: We already stipulated to that --

THE DEFENDANT: Right.

MS. ROBERTS: -- Your Honor and we stipulated that Mr. Bellisario would pay it with Dr. Holland.

THE COURT: Well --

MS. ROBERTS: Mr. Bellisario --

THE COURT: -- the problem we have is he's not going to pay it. So --

MS. ROBERTS: My client cannot --

THE COURT: do you --

MS. ROBERTS: -- afford everything.

THE COURT: Well, which one is more important right now? I -- you know --

MS. ROBERTS: Your Honor, Mr. Bellisario needs to work. We agreed to this --

THE COURT: I realize that.

MS. ROBERTS: -- over -- over --

THE COURT: He does need --

MS. ROBERTS: -- a year ago, I believe.

THE COURT: -- to work and I've ordered him to work, but unfortunately we -- we -- you know, we have got that particular constitutional amendment that says that we can't force someone to work.

MS. ROBERTS: Okay, but he -- he's getting a blank check from his parents to pay all of his bills.

MS. ROBERTS: So maybe -- and -- and grandpa's had to pay some of my bills so that she can keep Counsel. So maybe what Mr. Bellisario should do is go to the third party and ask them to help pay for it.

THE COURT: But --

THE DEFENDANT: Yeah.

THE COURT: -- the -- but that's just it. We can't force a third party to pay for it if he's not going to go ask him.

MS. ROBERTS: My client doesn't have the money to pay for it, Your Honor. She's supporting the children. Mr. Bellisario has not paid her child support.

THE COURT: I know. I realize that.

MS. ROBERTS: He has not paid the support. I -- I mean --

THE COURT: I realize that.

MS. ROBERTS: -- so some of this has to be on Mr. Bellisario to do.

THE COURT: It does, but we can't force him. So if we want it done, your client's going to have to be --

MS. ROBERTS: The mental --

THE COURT: -- willing to pay for it --

MS. ROBERTS: -- evaluation as --

THE COURT: -- with --

MS. ROBERTS: -- to Rule 35, I will have my client found -- find those funds. But that will be substantially different than a full blown custody --

THE COURT: Yeah.

1 MS. ROBERTS: -- evaluation. Your -- Your Honor
2 knows a full blown custody evaluation --
3 THE COURT: Can be --
4 MS. ROBERTS: -- is close --
5 THE COURT: -- thousands.
6 MS. ROBERTS: -- probably 15 to 20,000. A specific
7 psych eval pursuant to Rule 35 of Mr. Bellisario probably runs
8 2500. So there is a difference between asking her to find
9 2500 or $20,000.
10 THE COURT: What about a psych eval on both parties
11 and we wait for the custody evaluation?
12 THE DEFENDANT: I'm -- I'm fine with that.
13 MS. ROBERTS: If he pays hers, we'll pay his.
14 THE COURT: Okay. You pay for his, you pay for
15 hers.
16 THE DEFENDANT: That's fine.
17 THE COURT: Okay. But let -- let's do it -- you
18 know, you -- you need to go and start asking for money to help
19 -- help pay for this. So she will pay for yours and you will
20 pay for her psych eval. Who do we want to do the psych eval?
21 MS. ROBERTS: Well, Your Honor, they're going to be
22 the psych evals that we paid our own --
23 THE COURT: Okay.
24 MS. ROBERTS: -- evaluator for the psych eval. So

1 essentially what I will do is --
2 THE COURT: I want the same person to do both of
3 them.
4 MS. ROBERTS: I would have to think about it, Your
5 Honor. I can't give you a name as we -- by the end of the
6 hearing I will give you a name.
7 THE COURT: Okay. Yeah, I -- I want the same person
8 because I want the -- I want the cooperation on this here.
9 Each of you are going to want the psych evaluator to know what
10 the other -- you know, what's really going on in all this. So
11 you would only have to spend the money once for them to hear
12 everything, correct? So it's going to be cheaper to do it
13 that way. So we need to make sure that it's the same person
14 who is doing it. You mentioned -- didn't you -- didn't you
15 say Stephanie Holland at one point, Dr. Holland?
16 MS. ROBERTS: We stipulated to use Dr. Holland for a
17 full blown custody evaluation.
18 THE COURT: Why don't we start? Because if we can
19 come up with the funds later on to do the custody evaluation,
20 the psych eval is out of the way and she can -- and she would
21 be able to do that. So why don't we just use her?
22 MS. ROBERTS: I don't know that she's available
23 right now. What -- what call -- when I call them to get other
24 -- for other cases, my understanding is a lot of them are

backed up.

THE COURT: Most -- most of them are really backed up.

MS. ROBERTS: So if Stephanie Holland isn't available, my second choice would be --

THE COURT: What about Mark Chambers?

MS. ROBERTS: He's not full-time anymore.

THE COURT: Oh, okay.

MS. ROBERTS: So --

THE COURT: It's -- I -- I used to love reading his reports.

MS. ROBERTS: Yeah, Dr. Leinkeit's --

THE COURT: He was good.

MS. ROBERTS: -- not full-time anymore. Dr. Paglini is not.

THE COURT: Do you have any --

MS. ROBERTS: My staff are going to look up names --

THE DEFENDANT: I'm at --

MS. ROBERTS: -- Your Honor. If we can give you a name before the end of the hearing, a secondary person based --

THE COURT: Yeah.

MS. ROBERTS: -- upon availability --

THE COURT: Okay.

THE DEFENDANT: I would just like to be able to look at who they are because --

THE COURT: Yeah.

THE DEFENDANT: -- I don't know any of these people, so --

THE COURT: Okay. You know, it's --

MS. ROBERTS: Well, we agreed --

THE COURT: -- it's people --

MS. ROBERTS: -- to Dr. Holland. So if Dr. Holland can't, then we'll get Dr. Holland to give us three names --

THE DEFENDANT: Right.

MS. ROBERTS: -- of people who can do it.

THE DEFENDANT: Well, I --

THE COURT: Okay.

THE DEFENDANT: -- also sued her for fraud on that agreement because she misrepresented facts as to that --

THE COURT: Yeah, you got to stop suing people.

THE DEFENDANT: Well, she's got to stop breaking the law and then I will, so --

THE COURT: Okay. Yeah, I don't know if she's breaking the law. Ms. Roberts, stop breaking the law.

THE DEFENDANT: There we go.

THE COURT: I'm just joking.

THE DEFENDANT: All right.

THE COURT: Yeah.

THE DEFENDANT: I want that on the record.

THE COURT: Mr. Bellisario, stop breaking the law.

THE DEFENDANT: Okay. There we go.

THE COURT: Behave yourself. You can't ask someone to stop doing something unless you start doing what you're supposed to be doing. How is that? Okay.

MS. ROBERTS: So Dr. Holland -- if Dr. Holland's not available, then we'll ask her for three names and Mr. Bellisario can pick one within 48 hours of --

THE COURT: Yes.

MS. ROBERTS: -- those three names?

THE COURT: Yes.

MS. ROBERTS: Okay.

THE COURT: With the -- the modification of legal custody, when it comes to the mental and physical health of the child, I'm going to give Mom primary legal custody, that way Dad has rights to all the records anyway but he does not have rights to make any of the decisions.

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

THE COURT: It's --

THE DEFENDANT: And --

THE COURT: -- called primary legal custody. When it comes to schooling and stuff like that, he will still have

1 all of his school joint legal rights.
2 THE DEFENDANT: Okay. And what's that based on?
3 I'm just --
4 THE COURT: That is based on the fact that I want
5 the kids to have their mental well-being taken care of.
6 THE DEFENDANT: Right, but I -- I just don't
7 understand the -- nothing's happened since we had the finding
8 of joint to change that. So I don't understand --
9 THE COURT: Well, if you're interfering with the
10 ability of this child to get the mental health --
11 THE DEFENDANT: I'm not.
12 THE COURT: -- assistance that they need, then you
13 are -- you are interfering.
14 THE DEFENDANT: I'm not though, because at the time
15 of the July 30th hearing --
16 THE COURT: This is only temporary orders. We're
17 going to see if this helps. This is temporary.
18 THE DEFENDANT: Right.
19 THE COURT: Okay?
20 THE DEFENDANT: I know. I'm just saying at the time
21 of the July hearing when that was ordered those two therapists
22 had already been done.
23 THE COURT: Yeah. Well --
24 THE DEFENDANT: So we -- we agreed that we'd see

1 someone --

2 THE COURT: Well, we can't --

3 THE DEFENDANT: -- together, but I just --

4 THE COURT: -- use Ponzo because Ponzo has taken a

5 different role --

6 THE DEFENDANT: Gotcha.

7 THE COURT: -- in this.

8 THE DEFENDANT: Well, so I have -- I have no

9 problem. I told them if we agree on someone, I'm fine with --

10 THE COURT: Okay. Exactly what is the therapy?

11 Okay. What's the therapy about?

12 MS. ROBERTS: We outlined it in detail in the

13 motion. Bray -- Brayden has witnessed Dad's domestic violence

14 on Mom.

15 THE COURT: How old is Brayden?

16 MS. ROBERTS: Brayden is --

17 THE DEFENDANT: He's six.

18 MS. ROBERTS: -- six years old.

19 THE COURT: Six years old. Okay.

20 MS. ROBERTS: So he witnessed the domestic violence

21 on Mom. He's had some behavioral issues. We outlined that

22 for you telling the tutor that he was going to do -- harm her,

23 physically harm her. He is physical with his siblings. There

24 have been --

THE COURT: Okay.

MS. ROBERTS: -- ongoing issues regarding that which is why he was in therapy. And if you want me to pull the motion --

THE COURT: And --

MS. ROBERTS: -- I can --

THE DEFENDANT: No.

MS. ROBERTS: -- give you the more specifics.

THE COURT: The --

MS. ROBERTS: But those are the --

THE COURT: No.

MS. ROBERTS: -- things that are going on regarding therapy for Brayden.

THE DEFENDANT: And I have the Ponzo report that says he's perfectly fine with me. He doesn't -- they're saying he's afraid of me and all that stuff and they're saying that's not true; he's worried about what Mom is telling my son.

THE COURT: Well --

THE DEFENDANT: And that's why --

THE COURT: -- sir --

THE DEFENDANT: -- I'm doing --

THE COURT: Okay.

THE DEFENDANT: -- these things.

1 THE COURT: Here -- here is something. If you can
2 help us with the outsource evaluation, these people are
3 trained to find this stuff out. If you can help us come up
4 with money on it, we can have Dr. Holland get in here and
5 figure it out. But I need --
6 THE DEFENDANT: Right.
7 THE COURT: -- your help.
8 THE DEFENDANT: I mean, that's my problem is though
9 is my parents are tapped out because they've been helping me
10 this whole way. So I -- I don't really have any --
11 THE COURT: You know --
12 THE DEFENDANT: -- ways --
13 THE COURT: I mean --
14 THE DEFENDANT: -- to do it, so --
15 THE COURT: -- we -- we need help so I can get to
16 the bottom of all of this.
17 THE DEFENDANT: Right. I understand. And --
18 THE COURT: Okay.
19 THE DEFENDANT: -- I think it's disingenuous for
20 Plaintiff to be saying that --
21 THE COURT: Well, if you -- if -- if you could help
22 us come up with money, we can get to the bottom of it a heck
23 of a lot quicker than piecemealing it altogether right now.
24 THE DEFENDANT: Right. I understand that. I --

THE COURT: So, you know, would you go to your parents and ask them if they would help you with the full blown -- blown psych eval --

THE DEFENDANT: I mean --

THE COURT: You know --

THE DEFENDANT: -- they --

THE COURT: -- and it could -- I think it can be done between 10 --

THE DEFENDANT: She quoted me at $16,000.

THE COURT: At 16 -- I -- I was going to say, somewhere between 10 and 17,000.

THE DEFENDANT: Right. And my problem is my parents don't have anymore. I mean, they borrowed from the other family to do --

THE COURT: Okay.

THE DEFENDANT: -- what they've already done. Her dad's a multimillionaire and has been funding this the entire time and that she keeps claiming for is she's paying tens of thousands and tens of thousands for her attorney and --

THE COURT: Yeah. Well, I guess this is another reason why you need to get a job.

THE DEFENDANT: I have --

THE COURT: I really --

THE DEFENDANT: -- I can't do one that's --

THE COURT: -- want a full outsource evaluation. That is the best way --

THE DEFENDANT: I mean, I --

THE COURT: -- the best tool -- I mean, you're sitting here saying Mom is doing all this stuff, she's alienating the children, and all this other stuff. Have we thought about doing the psych eval with Dr. Holland and -- and using an MSW or an MFT to do the outsource so it's cheaper?

MS. ROBERTS: Only going to be any cheaper because the psych -- if two psych evals with Dr. Holland, my guess they're going to run six to 7,000 would be my guess. And then --

THE COURT: Well, if you can do one for 2500, you should be able to do two for five.

MS. ROBERTS: Potentially, but I think that what -- the Court is aware, and you have -- you practiced not too long ago --

THE COURT: Yeah.

MS. ROBERTS: -- they tell you it's 8,000 and then they get into it and they're like --

THE COURT: Then they add --

MS. ROBERTS: -- oh --

THE COURT: -- stuff.

MS. ROBERTS: -- we need more money, Ms. Roberts.

1 THE COURT: They need more money.
2 MS. ROBERTS: I have --
3 THE COURT: Yeah.
4 MS. ROBERTS: -- one doctor I'm --
5 THE COURT: Yeah, I know.
6 MS. ROBERTS: -- out right now, but I think we're at
7 $18,000.
8 THE COURT: trustee
9 THE DEFENDANT: Yeah, that's what --
10 MS. ROBERTS: So they start with a quote and then
11 they give you an estimate and it's -- I mean, just -- just for
12 the sake of argument, Your Honor, imagine what they're going
13 to have to read in these pleadings just alone.
14 THE COURT: Yeah.
15 MS. ROBERTS: And so it -- it is a case -- this is
16 -- this is such an amount of litigation material.
17 THE COURT: But enough of it has gone on now to
18 where it's not -- that -- that's -- it's going to be better
19 than waiting two years and still having to do this --
20 MS. ROBERTS: I'm fine with --
21 THE COURT: -- because at --
22 MS. ROBERTS: -- doing the psych --
23 THE COURT: -- some point this man is going to be
24 off the supervised visits if we can do it.

MS. ROBERTS: I'm fine with --

THE COURT: Okay.

MS. ROBERTS: -- Dr. Holland doing the psych evals, Your Honor. I'm fine with that, if she's available. If she's not, I'm fine with the Court's order that we will get three names from her. He has 48 hours to select one. And then hopefully that person also does custody evaluations. I mean, the pool of people in Clark County that are doing them is getting very small.

THE COURT: It is.

MS. ROBERTS: So you've already got --

THE COURT: Because people are --

MS. ROBERTS: -- Donna Wilburn --

THE COURT: -- getting --

MS. ROBERTS: -- out.

THE COURT: -- or -- or sued them.

MS. ROBERTS: You've got Nick Ponzo out. I mean --

THE COURT: Yeah.

MS. ROBERTS: -- there's only like six or seven that are qualified to do it.

THE COURT: Yeah, they are. They're -- it -- it is getting very small. And -- and that's why I'm like, you know, yes, we're doing the psych eval and everything, but if we don't have a PhD that's out there going through everything

else, it's going to be cheaper.

MS. ROBERTS: We just did a brief focus assessment with Maureen Zelensky and I think that was 4,000. So --

THE COURT: What --

MS. ROBERTS: -- and that was not as complicated a case as this.

THE COURT: Okay.

MS. ROBERTS: This require -- I -- in my --

THE COURT: This is --

MS. ROBERTS: -- opinion --

THE COURT: This is probably going to require, you know, a lot.

THE DEFENDANT: Yeah.

THE COURT: It really is. Sir, I'm going to need you to start looking. You need to look for a job. You need to see if you can come up with the money.

THE DEFENDANT: Okay.

THE COURT: I --

THE DEFENDANT: And --

THE COURT: -- really --

THE DEFENDANT: The issue --

THE COURT: I really think it would do you good --

THE DEFENDANT: Right. No, I --

THE COURT: -- if we can do an outsource evaluation.

THE DEFENDANT: I -- I honestly wanted that in the beginning, just I couldn't afford it. And then --

THE COURT: Yeah.

THE DEFENDANT: -- now the issue with getting a job is I've looked a little bit but I have all this stuff going on in criminal court because everything she's alleged there that if they put --

THE COURT: You know --

THE DEFENDANT: -- (indiscernible) --

THE COURT: You know, the -- the funny part is is it just takes a couple hours a week at most. You can still get a job. You need to get a job. And I understand depression and stuff like that is going to affect your ability to work, but you have to start helping yourself before I can help you.

THE DEFENDANT: Right. Well, I mean, I can probably get a job but it's not going to be a high-paying job because I can't --

THE COURT: Yeah.

THE DEFENDANT: -- deal with all the stuff right now. So --

MS. ROBERTS: Your Honor, could -- since you've ordered him to get a job, can he submit a work search every 30 days?

THE DEFENDANT: That's fine. I --

THE COURT: I -- well, let -- well, why -- why don't we do it every -- every two weeks.

MS. ROBERTS: Okay. How --

THE COURT: Okay.

MS. ROBERTS: -- many places --

THE COURT: I want you to be looking for -- for at least 10 jobs a week in something you're qualified.

THE DEFENDANT: All right. Well, I'm just saying I'm not -- like I don't think I'm able to be an attorney right now. Well, one, I didn't renew. And two, like I just don't think I can do that. So I don't know if you need it --

THE COURT: Well, we -- you know, you have the capability of earning a lot of money.

THE DEFENDANT: I can look for finance stuff, something like that, but --

THE COURT: You -- you know, you -- you need to find a job, you need to do one, and it's going to help take your mind off of the other problems.

Okay. So right now temporarily until we get the psych evals and hopefully an outsource evaluation, I am not going to modify va -- visitation. I am hoping at some point we can move to give him a little more.

MS. ROBERTS: So, Your Honor --

THE DEFENDANT: Can I --

MS. ROBERTS: -- right now Judge Pomrenze had lifted the supervision. Our request was to go back to supervision based upon the recent behaviors and the things that have been going --

THE DEFENDANT: There's --

MS. ROBERTS: -- going on we outlined in detail in the motions that we filed.

THE COURT: Who's the supervisor.

THE DEFENDANT: There was no su --

MS. ROBERTS: What happened, Your Honor, is that he was at Donna's House. We then agreed that the supervision would be modified and it would be one of the McKinley's (ph) and/or maternal grandfather and paternal grandparents together so that there was no claims of inappropriate behavior. We then had -- we found out that he was not exercising or following the court order regarding supervised visitation. We hired Hal De Becker to follow him and we got proof in the form of video and photographs, statements by Mr. De Becker that he's not following the court order.

So then we went back to court and Judge Pomrenze, on November 24th, said, Ms. Roberts, since I can't control him essentially and he's not going to follow my court order, she reduced his time from noon to 4:00 o'clock on Saturday -- I think it's Saturdays and re -- and gave him unsupervised

1 contact. That's why in our motion we filed to go back to
2 supervised even at Donna's House because grandpa and grandma
3 were not complying with the court order regarding supervision
4 and neither were the McKinleys.
5 THE DEFENDANT: Well, the issue is I would -- she
6 would take them to the McKinleys. I can't control what they
7 do. So if they say go do this, there was never a court order
8 that says what supervision is or what -- I -- so I have no
9 idea. And there was never any issue with the kids. There's
10 been no issue throughout this time. I have not seen them
11 since January 23rd because they just refuse to do anything to
12 let me see them.
13 THE COURT: Okay. I'm not -- I'm -- I'm not --
14 temporarily visitation will be with the paternal grandparents
15 with these rules --
16 MS. ROBERTS: Then the paternal grandparents need to
17 be parties to the action, Your Honor, because they've already
18 not complied with --
19 THE COURT: Hold on.
20 MS. ROBERTS: -- the court order.
21 THE COURT: Hold on. Well, we're going to put the
22 rules in place --
23 THE DEFENDANT: Well, they're not here.
24 THE COURT: -- so that they have rules.

1 MS. ROBERTS: They're not here. He said they --
2 THE DEFENDANT: They don't live here.
3 MS. ROBERTS: -- can't do it. They're not present.
4 They don't live here.
5 THE COURT: They don't live here? I thought your
6 mother --
7 THE DEFENDANT: No.
8 THE COURT: -- was living with you.
9 THE DEFENDANT: She went back home. They'll be here
10 this weekend if we can do something temporary for this
11 weekend. They'll -- they'll be here. This -- they love to
12 see the kids, so --
13 MS. ROBERTS: Your Honor, I'm asking again. The
14 motion is very detailed, Your Honor. The behaviors that are
15 going on violating the TPO, the -- is the SCRAM on right now?
16 THE DEFENDANT: Yeah.
17 MS. ROBERTS: Can I see it, please?
18 THE DEFENDANT: Did you get the report?
19 MS. ROBERTS: May I see the SCRAM, Your Honor?
20 THE COURT: Show her the SCRAM.
21 THE DEFENDANT: She always asks if it's on. Yes,
22 it's on.
23 MS. ROBERTS: I have not gotten one report from
24 SCRAM. Not one. And we've asked for it repeatedly.

THE COURT: Why is she not getting the reports from SCRAM?

THE DEFENDANT: I don't run SCRAM. I have no idea. So I -- I have --

MS. ROBERTS: We've --

THE DEFENDANT: I go there --

MS. ROBERTS: -- repeatedly asked for those reports.

THE COURT: Because I don't have anything either.

THE DEFENDANT: I thought there was one filed -- I saw one in my -- my notice of stuff that said it was back on after they arrested me. It got put back on, but I don't know.

MS. ROBERTS: So, Your Honor, this is what's happening. I mean, it -- it's detailed in this motion. So after --

THE DEFENDANT: It is --

MS. ROBERTS: -- Dad got unsupervised -- I -- I'd ask the Court to just --

THE COURT: Okay.

MS. ROBERTS: -- hear it. It's limited.

THE COURT: I -- I am ordering that you are going to make sure that SCRAM provides Ms. Roberts a report every two weeks. And on top of that, this Court is going to get a copy of that report as well.

THE DEFENDANT: I --

1 THE COURT: You're going --
2 THE DEFENDANT: I thought --
3 THE COURT: -- to have them --
4 THE DEFENDANT: I thought they were --
5 THE COURT: They --
6 THE DEFENDANT: -- sending it, so --
7 THE COURT: They have the capability of sending me
8 the report and Ms. Roberts a report.
9 THE DEFENDANT: Okay. I -- they -- I thought they
10 were sending it. Maybe the --
11 THE COURT: They're not. So it's your
12 responsibility. Until we start receiving --
13 THE DEFENDANT: Okay.
14 THE COURT: -- these reports, it's -- it's going to
15 be supervised visits at Donna's House. Once we start getting
16 the reports and we can -- and we can track everything, then it
17 will be unsupervised. Okay. So, you know, but -- but it's
18 going to -- we're -- we're going to track --
19 THE DEFENDANT: I haven't seen --
20 THE COURT: -- what's going --
21 THE DEFENDANT: -- my kids since January 23rd.
22 THE COURT: Sir, stop -- give us the reports. You
23 have total control over this.
24 THE DEFENDANT: The issue was --

1 THE COURT: And don't tell me you don't.
2 THE DEFENDANT: I can get -- I can go there today
3 and have them send it to you. I don't care. It's -- the
4 issue was --
5 THE COURT: Then the sooner you get it to us, the
6 sooner it will be unsupervised. How does that sound?
7 THE DEFENDANT: That's fine, but the --
8 MS. ROBERTS: Your Honor --
9 THE DEFENDANT: -- the issue was --
10 MS. ROBERTS: -- the SCRAM isn't the only issue
11 though. If you're going to -- you're going to hear then the
12 other issues before we move from supervised to unsupervised,
13 is that correct?
14 THE COURT: Yes.
15 MS. ROBERTS: Okay. I just want to make sure.
16 THE DEFENDANT: The issue with SCRAM -- I think it
17 was that there wasn't an order when I went to get it put it on
18 because they said you won't see your kids until you have it.
19 But she -- the order wasn't filed. So I went that say day and
20 setup an appointment for the next day so I can have it on to
21 -- to do it. I mean, there's been no issues with it so I --
22 THE COURT: Well, except for the fact they're not
23 giving any reports. So we're --
24 THE DEFENDANT: That's not my --

1 THE COURT: -- going to need those reports.
2 THE DEFENDANT: -- fault.
3 MS. ROBERTS: But that's --
4 THE COURT: It's --
5 MS. ROBERTS: -- not the only issue, Your Honor, as
6 it relates to the alcohol abuse. That's not the only issue.
7 I just want to be clear for the record.
8 THE COURT: Okay. You got the alcohol abuse. We've
9 got the TPO in place. That's going to help protect your
10 client. We're going to --
11 MS. ROBERTS: It's about the children's mental
12 health, Your Honor, and what's going on.
13 THE COURT: And that is why I'm giving her primary
14 legal custody --
15 MS. ROBERTS: That's fine.
16 THE COURT: -- so we can keep the children over
17 there and I -- and -- and I really want someone who's willing
18 to write a report.
19 MS. ROBERTS: Okay.
20 THE COURT: That way if I -- if there's anything
21 that we need to pay attention to, then we're going to know.
22 But I really want this man to be able to have the freedom to
23 come and go with his children. So as -- as long as -- you
24 know, there is no harm being done to these kids, they need

their dad as much as they need their mom. You know that and I know that.

MS. ROBERTS: So we -- we have outline for the Court what harm is being done to the children --

THE COURT: Correct.

MS. ROBERTS: -- for -- okay.

THE COURT: So --

MS. ROBERTS: I --

THE COURT: -- we're going to put everything in place to help protect the kids and if anything -- if any harm and stuff like that is going to happen.

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

THE COURT: But, you know, if he's not drinking, there's no -- I -- you know, right now I don't see any reason for him not to have unsupervised visits.

MS. ROBERTS: So -- but you will hear the argument --

THE COURT: I will hear the arguments. If something comes up, I will hear the arguments, okay?

MS. ROBERTS: Okay. So what days are we going to Donna's House?

THE COURT: I -- well, he says he's going to get this. So we -- we will do Donna's House visitation. What -- the work that he's going to be qualified to do is Monday

through Friday. So we're going to do it Saturday and Sunday, two --

MS. ROBERTS: Okay.

THE COURT: -- hours each day. And it's going to be at Mom's cost. But if he -- but -- but if the SCRAM comes back and it's -- he -- he's been clean, he's not been drinking, then it's unsupervised.

MS. ROBERTS: But you will set it for a hearing before you hear about it. That's what I'm saying. You're not -- all the things that have gone on since the SCRAM has been put on, that's the things that we need to argue, Your Honor. It's longer --

THE DEFENDANT: There's been nothing. That's the --

MS. ROBERTS: Your Honor, you have a person --

THE COURT: What is it?

MS. ROBERTS: Okay. So let --

THE COURT: Go ahead. Let's -- let's go ahead and get it out because we -- you know, because I've got a feeling he's going to get us the SCRAM report here real quick.

MS. ROBERTS: Okay. So you have a person that is sending my client messages that say I'm going to murder you slut. You have the child mimicking those statements to my client and to a third party who did an affidavit to the client to the court. We have a child telling people that he's going

1 to murder them, put them in a wood chipper, use an axe on
2 them. We have the behavioral issues with the children with
3 him striking his siblings. Those are learned behaviors, Your
4 Honor. And the person that we believe he is learning them
5 from are the Defendant. You don't -- this isn't something
6 that's happened. Since January, since all of this has
7 normalized, after Mr. Bellisario's arrest and the children
8 have been with my client, almost all of those issues have
9 resolved. There's no issues with hitting. He's not telling
10 anybody that he's going to kill them or murder them. Those
11 are adult words. That is not a word that a child uses, Your
12 Honor, at six years old. He has to be hearing that from
13 someone.
14 And so all of that -- I mean, it's outlined in here
15 in detail. There's a significant amount. Mr. Bellisario does
16 the exchange. The kids won't come back. So he's throwing
17 things at my client's house which is a violation of the TPO.
18 He's continually doing this --
19 THE COURT: What part of town you all live in?
20 THE DEFENDANT: Summerlin north.
21 MS. ROBERTS: She's in Summerlin, Your Honor.
22 THE COURT: Where do you live at, sir?
23 THE DEFENDANT: Centennial Hills.
24 THE COURT: Because I would really like for the

exchange to take place here at the courthouse and that way he has no reason to be anywhere near your house.

THE DEFENDANT: We -- it --

MS. ROBERTS: It doesn't matter, Your Honor. It's just not about the exchange. What he's saying and doing to these children is --

THE COURT: I know.

MS. ROBERTS: -- creating such a problem.

THE COURT: I know. But I'm -- I'm trying to take care of each one of these individual --

MS. ROBERTS: I understand.

THE COURT: -- deals. Okay. If he is doing this stuff and throwing things at her house and things like that, then if he's nowhere her house, we take that -- we -- we take that totally out.

MS. ROBERTS: Okay.

THE COURT: Okay.

THE DEFENDANT: And we --

THE COURT: But that's going to be too far -- you know, coming here is too far away from where both parties live, you know --

THE DEFENDANT: We were doing it at Northwest Area Command.

THE COURT: Okay.

1 MS. ROBERTS: My client's saying --
2 THE PLAINTIFF: I -- I don't --
3 MS. ROBERTS: -- she'll come in the courthouse
4 THE PLAINTIFF: I don't feel safe doing an exchange
5 anywhere.
6 THE DEFENDANT: We were doing it at --
7 THE COURT: Okay.
8 THE DEFENDANT: -- Northwest Area Command.
9 THE COURT: We are going to do the exchange here.
10 THE DEFENDANT: All right.
11 THE COURT: We are going to do it here at the
12 courthouse. You have no -- absolutely no reason to be
13 anywhere near your home. If you are found near her home,
14 you're violating the TPO.
15 THE DEFENDANT: Yeah, that's -- I have -- I have an
16 ankle monitor on so it says if I go anywhere near her.
17 MS. ROBERTS: Your Honor --
18 THE DEFENDANT: So --
19 MS. ROBERTS: -- the other issues are besides the
20 behavior that he's exhibiting, I mean, the way that he acts is
21 not appropriate. The things that he says to my office, to my
22 staff, the way he's acting in court, the way he acted before
23 Judge Bell, that is why the psych eval needs to be completed
24 before we move to unsupervised.

1 THE DEFENDANT: If we're going to --
2 MS. ROBERTS: That's the -- and Your Honor, the one
3 thing I do want you to order is that if my client pays for his
4 immediately because I'm going to call her dad as soon we're
5 done with today's hearing and ask him to pay it today. If he
6 pays it immediately, it doesn't delay Mr. Bellisario's
7 compliance with that. Because what's going to happen is we're
8 going to get it paid. Mr. Bellisario is not going to find a
9 way to pay for my --
10 THE DEFENDANT: I'll -- I'll --
11 MS. ROBERTS: -- client and this is --
12 THE COURT: Okay. You know what -- you know what,
13 let's -- let -- will you -- let's put my mind at ease. Let's
14 do this for four weeks. Get your psych eval done so I can get
15 it back. Okay.
16 THE DEFENDANT: That's fine.
17 THE COURT: Let's do this before -- the -- the
18 visitation will be at her cost. And if it comes back and he's
19 okay, I'm going to give him makeup time.
20 THE DEFENDANT: Can we at least -- can we do it at
21 the McKinley house? Because Sarah is always there. Nothing
22 has happened being wrong.
23 MS. ROBERTS: She is the one that violated the court
24 order --