

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
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Elizabeth A. Brown
Clerk of Supreme Court

KORI LOVETT CAGE,
Appellant(s),

vs.

MALIKA COPPEDGE,
Respondent(s),

Case No: 06R136990

Docket No: 83148

RECORD ON APPEAL VOLUME 1

ATTORNEY FOR APPELLANT
KORI L. CAGE, PROPER PERSON
8655 ROWLAND BLUFF AVE.
LAS VEGAS, NV 89178

ATTORNEY FOR RESPONDENT
BRIAN E. BLACKHAM, ESQ.
725 S. 8TH ST., #100
LAS VEGAS, NV 89101

06R136990

MALIKA COPPEDGE vs. KORI L. CAGE

I N D E X

<u>VOLUME:</u>	<u>PAGE NUMBER:</u>
1	1 - 240
2	241 - 480
3	481 - 687

06R136990

Malika Coppedge, Petitioner(s).

vs.

Kori L Cage, Respondent(s).

I N D E X

<u>VOL</u>	<u>DATE</u>	<u>PLEADING</u>	<u>PAGE NUMBER:</u>
1	11/30/2006	AFFIDAVIT OF SERVICE	9 - 10
1	03/30/2020	APPLICATION TO PROCEED IN FORMA PAUPERIS (CONFIDENTIAL)	140 - 142
2	01/07/2021	CASE APPEAL STATEMENT	408 - 412
2	01/08/2021	CASE APPEAL STATEMENT	424 - 425
3	06/14/2021	CASE APPEAL STATEMENT	615 - 620
3	06/28/2021	CASE APPEAL STATEMENT	641 - 645
3	06/29/2021	CASE APPEAL STATEMENT	646 - 647
3	07/07/2021	CASE APPEAL STATEMENT	658 - 659
3	06/28/2021	CERTIFICATE OF MAILING	623 - 623
3	03/04/2021	CERTIFICATE OF MAILING - CASE APPEAL STATEMENT	497 - 498
3	08/20/2021	CERTIFICATION OF COPY AND TRANSMITTAL OF RECORD	
2	09/22/2020	CLERK'S NOTICE OF NONCONFORMING DOCUMENT	304 - 306
2	10/27/2020	CLERK'S NOTICE OF NONCONFORMING DOCUMENT	332 - 334
2	01/14/2021	CLERK'S NOTICE OF NONCONFORMING DOCUMENT	434 - 436
1	04/21/2008	COPY OF ORDER FROM CLARK COUNTY, NEVADA, DATED SEPTEMBER 14, 2007 AND LETTER TO CONFORM	36 - 45
1	12/03/2008	COPY OF ORDER FROM DISTRICT COURT, CLARK COUNTY, NEVADA DATED SEPTEMBER 25, 2008 AND LETTER TO CONFORM	54 - 61
1	08/21/2008	COPY OF ORDER FROM DISTRICT COURT, CLARK COUNTY, NEVADA, DATED JUNE 18, 2008 AND LETTER TO CONFORM	46 - 53
1	04/03/2020	DA RESPONSE TO OBJECTION	143 - 154
1	11/04/2019	DISTRICT ATTORNEY'S NOTICE OF MOTION & MOTION TO MODIFY CHILD SUPPORT	63 - 69

06R136990

Malika Coppedge, Petitioner(s).

vs.

Kori L Cage, Respondent(s).

I N D E X

<u>VOL</u>	<u>DATE</u>	<u>PLEADING</u>	<u>PAGE NUMBER:</u>
1	04/19/2007	DISTRICT ATTORNEY'S OPPOSITION TO RESPONDENT'S OBJECTION	21 - 28
2	01/07/2021	DISTRICT ATTORNEY'S RESPONSE TO RESPONDENT'S OBJECTION AND APPEAL TO MASTER'S RECOMMENDATION	393 - 407
3	08/20/2021	DISTRICT COURT MINUTES	666 - 687
1	11/26/2019	MALIKA COPPEDGE'S OPPOSITION TO DISTRICT ATTORNEY'S NOTICE OF MOTION & MOTION TO MODIFY CHILD SUPPORT AND COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS	70 - 81
1	01/07/2020	MASTER'S RECOMMENDATION	102 - 105
1	07/10/2020	MASTER'S RECOMMENDATION	206 - 210
2	09/16/2020	MASTER'S RECOMMENDATION	273 - 277
2	10/13/2020	MASTER'S RECOMMENDATION	314 - 317
2	11/19/2020	MASTER'S RECOMMENDATION	342 - 345
3	06/11/2021	MEMORANDUM OF ATTORNEY'S FEES AND COSTS	572 - 596
3	05/25/2021	MOTION TO RECONSIDER PETITIONERS ATTORNEY FEES AND ADOPTION OF MASTERS RECOMMENDATIONS FROM THE OCTOBER 27, 2020 HEARING	529 - 538
3	05/04/2021	NEVADA SUPREME COURT CLERK'S CERTIFICATE/REMITTITUR JUDGMENT - DISMISSED	510 - 513
1	11/04/2006	NOTICE AND FINDING: FINANCIAL RESPONSIBILITY TO ENFORCE OR ADJUST AN EXISTING ORDER ESTABLISH AN OBLIGATION OR DETERMINE PATERNITY	1 - 8
2	01/07/2021	NOTICE OF APPEAL	413 - 423
3	06/14/2021	NOTICE OF APPEAL	597 - 614
3	06/28/2021	NOTICE OF APPEAL	624 - 640

06R136990

Malika Coppedge, Petitioner(s).

vs.

Kori L Cage, Respondent(s).

I N D E X

<u>VOL</u>	<u>DATE</u>	<u>PLEADING</u>	<u>PAGE NUMBER:</u>
2	09/22/2020	NOTICE OF ENTRY OF MASTER'S RECOMMENDATION	307 - 313
2	10/27/2020	NOTICE OF ENTRY OF MASTER'S RECOMMENDATION	325 - 331
2	10/27/2020	NOTICE OF ENTRY OF MASTER'S RECOMMENDATION	335 - 341
1	12/13/2019	NOTICE OF ENTRY OF MASTER'S RECOMMENDATIONS	82 - 83
1	03/17/2020	NOTICE OF ENTRY OF MASTER'S RECOMMENDATIONS	106 - 112
1	07/06/2020	NOTICE OF ENTRY OF MASTER'S RECOMMENDATIONS	199 - 205
3	05/11/2021	NOTICE OF ENTRY OF ORDER	514 - 528
3	07/15/2021	NOTICE OF ENTRY OF ORDER	664 - 665
3	07/02/2021	NOTICE OF ENTRY OF ORDER RE: AWARD OF ATTORNEY'S FEES AND COSTS TO PETITIONER	652 - 657
1	03/11/2008	NOTICE OF ENTRY OF ORDER/JUDGMENT	35 - 35
1	07/14/2020	NOTICE OF ENTRY OF ORDER/JUDGMENT	211 - 216
2	09/17/2020	NOTICE OF ENTRY OF ORDER/JUDGMENT	284 - 291
2	10/13/2020	NOTICE OF ENTRY OF ORDER/JUDGMENT	318 - 324
2	11/30/2020	NOTICE OF ENTRY OF ORDER/JUDGMENT	382 - 388
2	01/19/2021	NOTICE OF ENTRY OF ORDER/JUDGMENT	437 - 443
1	01/05/2007	NOTICE OF HEARING	11 - 16
1	05/21/2020	NOTICE OF HEARING	189 - 189
1	06/03/2020	NOTICE OF HEARING	190 - 195
2	08/03/2020	NOTICE OF HEARING	267 - 267
2	08/03/2020	NOTICE OF HEARING	268 - 268
2	08/03/2020	NOTICE OF HEARING	269 - 269

06R136990

Malika Coppedge, Petitioner(s).

vs.

Kori L Cage, Respondent(s).

I N D E X

<u>VOL</u>	<u>DATE</u>	<u>PLEADING</u>	<u>PAGE NUMBER:</u>
2	08/03/2020	NOTICE OF HEARING	270 - 270
2	12/08/2020	NOTICE OF HEARING	391 - 391
3	05/25/2021	NOTICE OF HEARING	539 - 539
3	06/08/2021	NOTICE OF HEARING	571 - 571
1	06/25/2020	NOTICE OF INTENT TO APPEAR BY COMMUNICATION EQUIPMENT	196 - 198
2	09/14/2020	NOTICE OF INTENT TO APPEAR BY COMMUNICATION EQUIPMENT	271 - 272
2	12/03/2020	NOTICE OF INTENT TO APPEAR BY COMMUNICATION EQUIPMENT	389 - 390
1	04/03/2020	NOTICE OF INTENT/REQUEST TO APPEAR BY COMMUNICATION EQUIPMENT	155 - 156
1	04/13/2007	NOTICE OF MOTION	19 - 20
2	01/28/2021	NOTICE OF RESCHEDULING OF HEARING	466 - 467
1	07/15/2020	NOTICE OF TELEPHONIC HEARING	217 - 222
2	09/17/2020	NOTICE OF TELEPHONIC HEARING	278 - 283
2	09/17/2020	NOTICE OF TELEPHONIC HEARING	292 - 297
2	09/22/2020	NOTICE OF TELEPHONIC HEARING	298 - 303
3	06/03/2021	NOTICE OF TELEPHONIC HEARING	540 - 547
1	02/18/2009	NOTICE TO CEASE CURRENT SUPPORT	62 - 62
1	07/29/2020	OBJECTION AND APPEAL THE JULY 6, 2020 MASTERS RECOMMENDATIONS	223 - 235
2	11/30/2020	OBJECTION AND APPEAL THE OCTOBER 27, 2020 MASTERS RECOMMENDATIONS	346 - 381
1	04/13/2007	OBJECTION TO MASTER'S RECOMMENDATIONS AND	17 - 18

I N D E X

<u>VOL</u>	<u>DATE</u>	<u>PLEADING</u>	<u>PAGE NUMBER:</u>
		NOTICE OF OBJECTION - CHILD SUPPORT; OBJECTION TO MASTER'S RECOMMENDATIONS	
3	06/08/2021	OPPOSITION TO PLAINTIFF'S MOTION TO RECONSIDER PETITIONER'S ATTORNEY'S FEES AND ADOPTION OF MASTERS RECOMMENDATIONS FROM THE OCTOBER 27, 2020, HEARING AND COUNTERMOTION TO VACATE THE HEARING, DEEM KORI A VEXATIOUS LITIGANT, AND FOR ATTORNEY'S FEES AND COSTS	548 - 570
3	07/12/2021	ORDER APPROVING REPORT AND RECOMMENDATIONS	660 - 663
3	04/28/2021	ORDER FOLLOWING OBJECTION	499 - 509
1	06/22/2007	ORDER ON OBJECTION	29 - 34
3	07/01/2021	ORDER RE: AWARD OF ATTORNEY'S FEES AND COSTS TO PETITIONER	648 - 651
2	02/18/2021	ORDER TO PROCEED IN FORMA PAUPERIS (CONFIDENTIAL)	468 - 470
2	02/22/2021	ORDER TO PROCEED IN FORMA PAUPERIS (CONFIDENTIAL)	471 - 472
2	01/12/2021	PETITION FOR REVIEW (SUPREME COURT OF THE STATE OF NEVADA DOCUMENT 81968)	426 - 433
1	01/06/2020	PETITIONER'S RESPONSE TO KORI L. CAGE'S OBJECTION AND APPEAL THE DECEMBER 13, 2019 MASTER'S RECOMMENDATIONS AND COUNTERMOTION TO ADOPT MASTER'S RECOMMENDATIONS IN FULL, AND FOR ATTORNEY'S FEES AND COSTS	84 - 101
1	07/31/2020	PETITIONER'S RESPONSE TO KORI L. CAGE'S OBJECTION AND APPEAL THE JULY 6, 2020 MASTERS RECOMMENDATIONS AND COUNTERMOTION TO ADOPT MASTER'S RECOMMENDATIONS IN FULL, AND FOR ATTORNEY'S FEES AND COSTS (CONTINUED)	236 - 240
2	07/31/2020	PETITIONER'S RESPONSE TO KORI L. CAGE'S OBJECTION AND APPEAL THE JULY 6, 2020 MASTERS RECOMMENDATIONS AND COUNTERMOTION TO ADOPT MASTER'S RECOMMENDATIONS IN FULL, AND FOR	241 - 266

06R136990

Malika Coppedge, Petitioner(s).

vs.

Kori L Cage, Respondent(s).

I N D E X

<u>VOL</u>	<u>DATE</u>	<u>PLEADING</u>	<u>PAGE NUMBER:</u>
		ATTORNEY'S FEES AND COSTS (CONTINUATION)	
1	04/07/2020	PETITIONER'S RESPONSE TO KORI L. CAGE'S OBJECTION AND APPEAL THE MARCH 13, 2020 MASTERS RECOMMENDATIONS AND COUNTERMOTION TO ADOPT MASTER'S RECOMMENDATIONS IN FULL, AND FOR ATTORNEY'S FEES AND COSTS	157 - 188
2	01/22/2021	PETITIONER'S RESPONSE TO KORI L. CAGE'S OBJECTION AND APPEAL THE OCTOBER 27, 2020 MASTER'S RECOMMENDATIONS AND COUNTERMOTION TO ADOPT MASTER'S RECOMMENDATIONS IN FULL, AND FOR ATTORNEY'S FEES AND COSTS	444 - 465
2	12/08/2020	RECEIPT OF COPY	392 - 392
3	06/16/2021	REPORT AND RECOMMENDATION	621 - 622
2	02/23/2021	RESPONDENT'S REPLY TO THE DISTRICT ATTORNEY AND PETITIONERS' RESPONSE TO RESPONDENT'S OBJECTIVE AND APPEAL TO MASTER'S RECOMMENDATION (CONTINUED)	473 - 480
3	02/23/2021	RESPONDENT'S REPLY TO THE DISTRICT ATTORNEY AND PETITIONERS' RESPONSE TO RESPONDENT'S OBJECTIVE AND APPEAL TO MASTER'S RECOMMENDATION (CONTINUATION)	481 - 496
1	03/30/2020	RESPONDENTS OBJECTION AND APPEAL OF THE MARCH 13, 2020 MASTERS RECOMMENDATION	113 - 139

ORIGINAL

FILED

Nov 4 3 37 PM '06

Shirley E. Paragimne
CLERK

DISTRICT COURT
CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human Services,
Div. Of Welfare & Supportive Services,
and (Malika Coppedge),
vs.
Kori L Cage,
Petitioner,
Respondent.

Case no.

R 136990

Dept. no.

CHILD SUPPORT

[Signature]

NOTICE AND FINDING OF FINANCIAL RESPONSIBILITY TO ENFORCE OR ADJUST
AN EXISTING ORDER ESTABLISH AN OBLIGATION OR DETERMINE PATERNITY

Pursuant to NRS 425.382 through NRS 425.3852 inclusive, the Respondent/Obligor is served
notice that:

Petitioner/Obligee is the custodial parent of your dependent child(ren):

Name

Kyree

Cage

Date of birth

December 03, 2004

You are not currently under a Court Order to pay child support, but you may be required to pay
arrearages/back child support based on your legal duty to support your child(ren).

Pursuant to NRS 125B.070, your alleged monthly child support obligation is 18% of your gross
monthly income. Your gross monthly income was calculated based upon a financial statement, employer
verification, Employment Security Division information, tax returns, occupational employment statistics
or Nevada average wage. (See attached Obligation Worksheet for Current Child Support.)

///

///

7.

1 It is alleged that you owe an arrearage/debt to Petitioner/Obligee or to a Public Agency totaling
2 \$5026.00 as of October 31, 2006, therefore; a reasonable payment will be sought to satisfy this debt.

3 You are required to pay the arrearage/debt in full.

4 You must make payment to:

5 State Collection and Disbursement Unit
6 PO Box 98950
Las Vegas, NV 89193-8950

7 and include your Social Security number on every payment you make.

8 You may be required to provide health insurance coverage for your child(ren), if it is required
9 by an existing court order or available to you through your employment or through a group plan.

10 Interest will be assessed on all unpaid child support balances for cases with a Nevada
11 controlling order pursuant to NRS 99.040. A 10% penalty will be assessed on each unpaid installment,
12 or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095.

13 If you pay your child support through income withholding and your full obligation is not met by
14 the amount withheld by your employer, you are responsible to pay the difference between your court
15 ordered obligation and the amount withheld by your employer directly to the state disbursement unit. If
16 you fail to do so, you will be subject to assessment of interest.

17 You may avoid these additional costs by making your current child support payments each
18 month.

19 If you do not respond to this notice within 20 days after you receive it, a default judgment and
20 order will be entered against you.

21 When judgment is entered by the Court, all procedures authorized by law to enforce payment of
22 the obligation may be used. These procedures include, but are not limited to, income withholding,
23 income assignment, garnishment, attachment, liens, execution on real and personal property and
24 interception of federal income tax refunds.

25 ///

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David Roger, District Attorney, Nevada Bar #002781
Family Support Division
3011 Clark Avenue, Suite 100
Las Vegas, Nevada 89101
(702) 671-4200 - TDD (702) 383-7486 (for the hearing impaired)

1 Your response must be sent to:

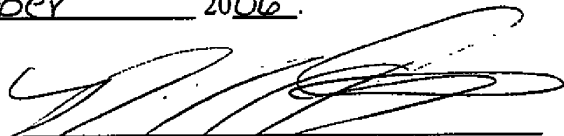
2 Clark County District Attorney
3 Family Support Division
301 Clark Avenue, Suite 100
4 Las Vegas, NV 89101

5 You may respond by (1) Requesting a conference to resolve the allegations in this Notice prior
6 to a judicial hearing or (2) Requesting a judicial hearing, in writing, setting forth your objections or
7 responses to the allegations in this Notice.

8 You must notify this office of any change in your address, employment or health insurance
9 coverage/availability.

10 Attached to this notice are important documents. If you have any questions or do not
11 understand this Notice or the attached documents, call or visit this office or consult an attorney.

12 Dated this 31st day of October 2006.

13 
14 _____
15 Employee, Office of the District Attorney
16 Family Support Division
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OBLIGATION WORKSHEET

1. CASE IDENTIFYING INFORMATION

Petitioner: Malika Coppedge Docket number _____
 Relation: Mother
 Respondent: Kori L Cage Number of children: 1

☒ No court order

Arrears to begin (MM/YY) 09/05 based on the date of the original IV-D application not to exceed four years from date of filing of the Notice and Finding.

☐ Court order number _____, see attached.
 Date of order: _____ State: _____ County: _____

2. DETERMINING INCOME

From	Through	Wage per hour per income verification *	X Hours per week	X 52 weeks	=Yearly Income	/12 Months	Gross Monthly Income ☒ Verified wages used. ☐ Imputed wages used. ☐ NV average wage used income & occupation cannot be ascertained
09/05	10/06	\$11.50	40	52	\$23,920.00	12	\$1,993.33
				52	\$ 0.00	12	\$ 0.00
				52	\$ 0.00	12	\$ 0.00
				52	\$ 0.00	12	\$ 0.00

3. DETERMINING OBLIGATION

From	Through	Gross monthly income	X Formula (18% for 1 child, 25% for two children 29% for 3 children, 2% for each additional child)	= Child support obligation rounded to the nearest dollar or ☐ Presumptive maximum ☐ \$100 per child minimum
09/05	10/06	\$1,993.33	18 %	\$ 358.80
			%	\$ 0.00
			%	\$ 0.00
			%	\$ 0.00
				\$359.00

4. COMPUTING ARREARS

From	Through	CS Obligation	X Number of Months	= Total Obligation
09/05	10/06	\$359.00	14	\$5,026.00
				\$ 0.00
				\$ 0.00
				\$ 0.00
Arrears per prior order				
Payments received				
Accrued interest (see attached)				
Total arrears				\$5,026.00


 Family Support Specialist's Signature

October 31, 2006
 Date

* The income verification is on file with the District Attorney's Office, Family Support Division.

RECEIVED
SEP 06
HENDERSON

CERTIFICATION OF VITAL RECORD

STATE OF MARYLAND

DEPARTMENT OF HEALTH AND MENTAL HYGIENE
DIVISION OF VITAL RECORDS
CERTIFICATE OF LIVE BIRTH

STATE FILE NUMBER:

2004 65202

NAME:

KYREE LOVETT CAGE

SEX: MALE

DATE OF BIRTH:

DECEMBER 3, 2004

WEIGHT: 8 LBS 5 OZ

PLACE OF BIRTH:

BAITIMORE CITY

TIME: 2:31:16 PM

MAIDEN NAME OF MOTHER:

MALINA COOPERIDGE

AGE: 24

MOTHER'S PLACE OF BIRTH:

MARYLAND

KORI LOVETT CAGE

AGE: 24

NAME OF FATHER:

FATHER'S PLACE OF BIRTH:

OREGON

DECEMBER 8, 2004

DATE ISSUED: 03/01/2005

DATE RECORD FILED:

I HEREBY CERTIFY THAT THIS DOCUMENT IS A TRUE COPY OF A RECORD ON FILE IN THE
DIVISION OF VITAL RECORDS

STATE REGISTRAR

DO NOT SIGN OR WRITE ON THIS CERTIFICATE. ANY ALTERATION OR ERASURE VOID THIS CERTIFICATE.

OFFICE OF THE DISTRICT ATTORNEY



DAVID ROGER
District Attorney

Family Support Division

(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

Operational Unit A
301 Clark Ave, #100, Las Vegas, NV 89101
Fax: (702) 366-2320

ROBERT W. TEUTON
Assistant District Attorney

CHRISTOPHER J. LALLI
Assistant District Attorney

MARY-ANNE MILLER
County Counsel

C.A. WATTS
Director

REQUEST FOR HEARING

Case no: _____

Nevada Dept Of Health & Human Services Div. Of Welfare & Supportive Services
and (Malika Coppedge) vs. Kori L Cage

To: Clark County District Attorney's Office
301 Clark Avenue, Suite 100
Las Vegas, Nevada 89101

I request a hearing regarding:

☐ Duty of Support

☐ Arrearages

☐ Wage Withholding

☐ Insurance

☐ My denial of paternity of: _____

☐ Registration of order

☐ Determination of controlling order

My reasons for asking for a hearing are as follows:

I understand I have the **burden of proof to establish** this defense and that I am responsible for informing your office of any change in my address.

Print Name

Signature

Attorney (if applicable)

Address

Telephone number

REQUEST FOR HEARING, Continued

Case no.: _____

Nevada Dept Of Health & Human Services, Div. Of Welfare & Supportive
Services, and (Malika Coppedge) vs. Kori L Cage

Non-custodial parent's information:

Telephone number

Address City State ZIP Code

Employer Telephone number

Employer's Address City State ZIP Code

Attorney (if applicable) Address Telephone number

Print Name Signature SSN Telephone number

Case Name: _____ Case Number: _____

DOMESTIC OR FAMILY VIOLENCE STATEMENT

I believe the release of my and/or the child(ren)'s address and/or other identifying information would unreasonably put me and/or the child(ren)'s health, safety, or liberty at risk.

☐ NO

☐ YES. Explain fully and attach filed copies of all relevant court orders and other documentation.

(If additional space is needed, continue on a separate sheet of paper.)

Disclosure of Information:

Any information contained in this application can be used in other cases in which you are involved, such as a change in child custody where you become a noncustodial parent. Information contained in CSE program cases is not given to anyone not directly involved in the administration of the program.

If the CSE program requests assistance of another state, the Uniform Interstate Family Support Act of 1996 (UIFSA) requires personal identifying information be provided to that state about you and the children in your custody, such as resident address. Nevada law provides protection for you and the children in your custody if there is serious risk of family violence or child abduction. A court can order personal identifying information not be given if the health, safety or liberty of you or the children in your custody would be at risk.

BY SIGNING THIS APPLICATION, I ACKNOWLEDGE THE RESPONSIBILITIES AS LISTED AND AGREE TO THE SERVICES THE CHILD SUPPORT ENFORCEMENT PROGRAM PROVIDES.

I DECLARE UNDER PENALTY OF PERJURY THAT THE INFORMATION I HAVE PROVIDED ON THIS APPLICATION IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF AND THAT THE STATEMENTS CONTAINED HEREIN ARE MADE FOR THE PURPOSES STATED HEREIN, INCLUDING BUT NOT LIMITED TO, OBTAINING ASSISTANCE IN ESTABLISHING PARENTAGE AND/OR AN ORDER FOR CHILD SUPPORT ALONG WITH THE COLLECTION OF CHILD SUPPORT.

Name of Applicant (Please Print)

Signature of Applicant

Date

(Page 7 of 7) 4000 - EC (3/06)

1 AOS
David Roger, District Attorney
Nevada Bar No. 002781
2 Family Support Division
301 Clark Avenue, Suite 100
3 Las Vegas, Nevada 89101
(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)
4 Dept J

FILED

Nov 30 7 34 AM '06

Shirley B. Rungione
CLERK

ORIGINAL
DISTRICT COURT
CLARK COUNTY, NEVADA

8 Nevada Dept Of Health & Human Services)
Div. Of Welfare & Supportive Services)
9 (Malika Coppedge))
10)
11)
12)
Kori L Cage,)
Respondent.)

Case no. R136990

Dept. no. CHILD SUPPORT

vs.

AFFIDAVIT OF SERVICE

14 STATE OF NEVADA)
15) ss.
16 COUNTY OF CLARK)

17 I, Roger Lawson, under penalty of perjury affirm the assertions of this
18 affidavit are true:

19 1. That affiant is and was at all times hereinafter mentioned, a resident of the State of Nevada, a
20 citizen of the United States over the age of eighteen (18) years and not a party to nor interested in the
21 above-entitled action.

22 2. That on November 21, 2006, affiant served a copy of:

23 ☐ Order to Show Cause Why Respondent Should Not Be Punished for Contempt.

24 ☐ Order to Show Cause in Re: Respondent's Employer.

25 ☐ Order to Show Cause to Compel Genetic Testing

26 ☐ Other: _____

27 ///
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RECEIVED

NOV 29 2006

COUNTY CLERK

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☒ Notice and Finding of Financial Responsibility to Enforce or Adjust an Existing Order, Establish an Obligation or Determine Paternity by:

☒ Delivering and leaving a copy with the Respondent, Kori Lovett Cage, at (state address) 6650 W. Warm Springs 2102 Las Vegas NV

☐ Serving the Respondent, Kori Lovett Cage, by personally delivering and leaving a copy with _____, a person of suitable age and discretion residing at the Respondent's usual place of abode located at: (state address) _____

☐ Delivering and leaving a copy with the Petitioner, Malika Coppedge, at (state address) _____

☐ Serving the Petitioner, Malika Coppedge, by personally delivering and leaving a copy with _____, a person of suitable age and discretion residing at the Petitioner's usual place of abode located at: (state address) _____

Dated this 21 day of November 2006.

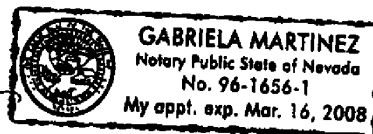
Robert Lawson
Signed

Signed and sworn to before me

By: Robert Lawson

This 21 day of November 2006

Gabriela Martinez
Notary Public in and for said County and State



ORIGINAL

FILED

JAN 5 7 38 AM '07

Shirley D. Hargrave
CLERK

DISTRICT COURT
CLARK COUNTY, NEVADA

NOHCSE
David Roger, District Attorney
Nevada Bar No. 002781
Family Support Division
301 Clark Avenue
Las Vegas, Nevada 89101
(702) 671-9200

NEVADA DEPT OF HEALTH & HUMAN SERVICES,)
Div. Of Welfare & Supportive Services,)
and (Malika Coppedge),)

Petitioner,)

Case no. R136990

vs.)

Dept. no. CHILD SUPPORT

Kori L Cage,)

Respondent.)

NOTICE OF HEARING

To: Kori Lovett Cage, Respondent

To: Malika Coppedge, Petitioner

Notice is hereby given that the undersigned will bring the above-entitled matter before the Child Support Hearing Master on the 5th day of April, 2007, at the hour of 09.30 AM in the Family Court and Services Center, 601 North Pecos Road, Las Vegas, Nevada, for review pursuant to NRS 31A, NRS 125B, NRS 126, NRS 130 and NRS 425.

The purpose of this hearing is to address:

- ☒ Notice and Finding of Financial Responsibility to Enforce or Adjust an Existing Order, Establish an Obligation or Determine Paternity
- ☐ Support arrears
- ☐ Health insurance
- ☐ Income withholding
- ☐ Child support lien
- ☐ Driver license suspension
- ☐ Professional, occupational, recreational license suspension

///

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JAN - 4 2007

COUNTY CLERK

NOHCSE

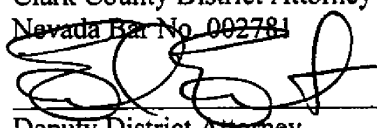
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- ☐ Notice of Intent to: _____
- ☐ Status check of this companion/partner case
- ☐ The attached Respondent's/Petitioner's Request
- ☐ Other: _____

The request for this hearing, if any, is attached hereto and by this reference made a part hereof.

If you do not appear, the hearing will proceed in your absence, and an Order and Judgment may be entered against you. You should bring any records you believe are relevant to your case to this hearing.

Dated this 2nd day of December, 2006

David Roger
Clark County District Attorney
~~Nevada Bar No. 002781~~

Deputy District Attorney

OFFICE OF THE DISTRICT ATTORNEY



DAVID ROGER
District Attorney

Family Support Division
(702) 671-9200 • TDD (702) 385-7486 (for the hearing impaired)

Operational Unit A
301 Clark Ave, #100, Las Vegas, NV 89101
Fax: (702) 366-2320

ROBERT W. TEUTON
Assistant District Attorney
CHRISTOPHER J. LALLI
Assistant District Attorney
MARY-ANNE MILLER
County Counsel
C.A. WATTS
Director

REQUEST FOR HEARING

Case no: B136990

Nevada Dept Of Health & Human Services Div. Of Welfare & Supportive Services
and (Malika Coppedge) vs. Kori L Cage

To: Clark County District Attorney's Office
301 Clark Avenue, Suite 100
Las Vegas, Nevada 89101

I request a hearing regarding:

- ☐ Duty of Support
- ☒ Arrearages
- ☐ Wage Withholding
- ☐ Insurance
- ☐ My denial of paternity of: _____
- ☐ Registration of order
- ☐ Determination of controlling order

My reasons for asking for a hearing are as follows:

I received an arrearages letter
on Nov. 21st and I dispute the charges.

I understand I have the **burden of proof to establish** this defense and that I am responsible for informing your office of any change in my address.

Kori Cage Kori Cage
Print Name Signature

Attorney (if applicable) Address Telephone number

1 CERT

Case no. R136990

2

CERTIFICATE OF MAILING

3

4

The foregoing Notice of Hearing was served upon Kori Lovett Cage by mailing a copy thereof,
first class mail, postage prepaid to:

5

6

KORI LOVETT CAGE
6650 W Warm Springs Rd 2102
Las Vegas NV 89118

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8

9

on the 3rd day of January, 2007.

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Employee, District Attorney's Office
Family Support Division

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David Rager, District Attorney
Nevada Bar No. 002781
Family Support Division
301 Clark Avenue #100
Las Vegas, Nevada 89101
(702) 671-9280 - TDD (702) 385-7486 (for the hearing impaired)

1 CERT

Case no. R136990

2

CERTIFICATE OF MAILING

3

4

The foregoing Notice of Hearing was served upon Malika Coppedge by mailing a copy thereof, first class mail, postage prepaid to:

5

6

Malika Coppedge
2815 W Ford Ave 2119
Las Vegas, NV 89123

7

8

on the 3rd day of January, 2007.

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Employee, District Attorney's Office
Family Support Division

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David Roger, District Attorney
Nevada Bar No. 002781
Family Support Division
301 Clark Avenue #100
Las Vegas, Nevada 89101
(702) 671-9310 - TDD (702) 385-7486 (for the hearing impaired)

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AFFIRMATION

Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding:

NOTICE OF HEARING

(Title of Document)

filed in District Court Case number: R136990

does not contain the social security number of any person.



Employee, District Attorney's Office
Family Support Division

January 3, 2007
Date

Name: Kori Cage # 2102
 Address: 6650 Warm Springs RD
 Telephone: (503) 449-1367
 Acting In Proper Person

FILED

APR 13 1 34 PM '07

Chaf. Stan
 CLERK OF THE COURT

IN THE FAMILY DIVISION
 OF THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
 IN AND FOR THE COUNTY OF CLARK

101
 In re the Matter of: Nevada Dept. of Health) Case No.: R136990
Div. of Welfare (Malika Coppedge)) Dept.: Child Support
 Petitioner,)
 and)
Kori L. Cage)
 Respondent)

**OBJECTION TO MASTER'S
 RECOMMENDATIONS AND NOTICE
 OF OBJECTION - Child Support**

OBJECTION TO MASTER'S RECOMMENDATIONS

TO: Malika Coppedge and his/her attorney of record,
 (other party's name)
David Roger; Notice is hereby given
 (name of other party's attorney, or if this is a child support case the District Attorney's name)
 that Kori Cage who is the Respondent in this
 (your name) (Petitioner or Respondent)

action, does hereby request a review of the Master's Recommendation entered on

April 5, 2007 by Master _____
 (date recommendation was entered) (name of Master who signed the Recommendation).

A Review and denial of the Master's Recommendations is requested pursuant to EDCR 1.40(e)
 & (f) for the following reasons:

1 I want to formally appeal the Master's
2 Recommendation to pay child Support to
3 Malika Coppedge, due to the fact that I
4 didn't have any legal Representation at
5 the initial hearing, and wasn't given
6 the opportunity to show any evidence
7 that I support Kyree Cage.

8
9 (Receipts, Lease agreement, etc.)
10
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16

17
18 Notice is hereby given that Kori Cage the
(your name)

19 Respondent in the above entitled action, will appear before
20 (Petitioner or Respondent)

21 Department _____ of the above-entitled Court on _____ at the
(Department your case is set in) (date your hearing is set for)

22 hour of _____
23 (time your hearing is set for)

24 Dated this 13 day of April, 2007

25 Kori Cage
(sign your name here)

35
FILED
APR 13 1 34 PM '07

Chaf...
CLERK OF THE COURT

NOTC

(Your name) Kori Cage # 2102
(Address) 6650 Warm Springs RD
Las Vegas NV 89118
(Telephone) (503) 444-1367
In Proper Person

Nevada Dept of Health & Human Services
Div of Welfare & Sup. Serv
DISTRICT COURT
CLARK COUNTY, NEVADA

Malika Coppedge)
Plaintiff/Petitioner,)
vs.)
Kori L. Cage)
Defendant/Respondent)

Case No.: R136990
Dept. No.: Child Support
Oral Argument Requested: J
Yes _____ No _____

NOTICE OF MOTION

(Check one)
☐ TEMPORARY ORDER ☐ CHANGE IN ORDER

(Check all that apply)
☒ CHILD SUPPORT ☐ CHILD CUSTODY ☐ VISITATION
☐ PROPERTY ISSUES ☐ SPOUSAL SUPPORT ☐ ATTORNEY FEES AND COSTS
☐ CONTEMPT ☐ EXCLUSIVE POSSESSION
☐ MEDICAL INSURANCE AND UNREIMBURSED MEDICALS
☐ OTHER _____

TO: Name of Opposing Party Malika Coppedge; and
TO: Name of attorney for Opposing Party, if one David Roger

PLEASE TAKE NOTICE that a hearing on this motion for the relief requested will be held
before the Eighth Judicial District Court - Family Division at 601 N. Pecos Road, Las Vegas 89101,
on 5-29-07 of (month) _____, (year) _____ in Department J
10:30 AM
at (time), _____ m.



Supporting documentation filed with this motion: (check all that apply)

- ☐ Affidavit(s) ☐ Completed Financial Affidavit ☐ UCCJA Declaration ☐ Exhibits
☐ Schedule of Arrearages

4/13/07
(date)

Kori Cage
(type or print name)

Kori Cage
(Signature)

NOTICE: YOU ARE ADVISED THAT FAILURE TO FILE AND SERVE A WRITTEN OPPOSITION WITHIN 10 DAYS AFTER SERVICE MAY BE UNDERSTOOD AS AN ADMISSION THAT THIS MOTION IS VALID. IF YOU HAVE CHILDREN FROM THIS RELATIONSHIP, THE COURT IS REQUIRED TO ORDER PAYMENT OF CHILD SUPPORT. THE AMOUNT OF CHILD SUPPORT CAN BE LARGE. IT NORMALLY CONTINUES UNTIL THE CHILD IS 18. YOU SHOULD SUPPLY THE COURT WITH INFORMATION ABOUT YOUR FINANCES. OTHERWISE, THE CHILD SUPPORT ORDER WILL BE BASED ON THE INFORMATION SUPPLIED BY THE OTHER PARENT.

ORIGINAL

FILED

APR 19 8 18 AM '07

Chief Clerk
CLERK OF THE COURT

1 **OPPS**
2 DAVID ROGER
3 DISTRICT ATTORNEY
4 Nevada Bar No. 002781
5 FAMILY SUPPORT DIVISION
6 301 Clark Avenue, Suite 100
7 Las Vegas, Nevada 89101
8 (702) 671-9200

6 DISTRICT COURT
7 CLARK COUNTY, NEVADA

9 NEVADA DEPT. OF HEALTH & HUMAN
10 SERVICES, DIVISION OF WELFARE &
11 SUPPORT SERVICES (Malika Coppedge),

12 Petitioner,

Case No.: R-136990

13 vs.

Dept. J

14 Kori L. Cage,

(Child Support)

15 Respondent.
16

17 DISTRICT ATTORNEY'S OPPOSITION TO RESPONDENT'S OBJECTION

18 DATE OF HEARING: 5-29-07

19 TIME OF HEARING: 10:30 a.m.

20 COMES NOW, the STATE OF NEVADA, through DAVID ROGER, District Attorney, by
21 and through Edward W. Ewert, Deputy District Attorney, and files this DISTRICT ATTORNEY'S
22 OPPOSITION TO RESPONDENT'S OBJECTION filed on April 13, 2007.

23 //

24 //

25 //

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RECEIVED

APR 19 2007

CLERK OF THE COURT

1 This Opposition is made and based upon the pleadings and papers on file herein, the attached
2 Points and Authorities, exhibit(s), if any, and oral argument, if any, at the time of the hearing.

3 DATED this 18th day of April, 2007.

4 Respectfully Submitted,
5 DAVID ROGER
6 DISTRICT ATTORNEY
7 Nevada Bar # 002781

8 BY:

9 
ED EWERT
10 Deputy District Attorney
11 Nevada Bar #3405

12 **POINTS AND AUTHORITIES**

13 **FACTS**

14 Petitioner-Mother, ("Mother"), and Respondent, ("Father"), were never married. However,
15 the Child Support Court master confirmed at the hearing of April 5, 2007 that Kori Cage is, indeed,
16 the father of Kyree Cage, d.o.b. 12-03-04, the subject child in this case. See Master's
17 Recommendation, ("MROJ"), from the April 5, 2007 hearing, a true and correct copy of which is
18 attached hereto as **Exhibit 1** and incorporated herein by this reference.

19 At the hearing Father testified that he earns \$11.25 per hour and works 50 hours per week,
20 regularly. The master accepted Father's testimony at face value, correctly determined that that
21 produced a gross monthly income of \$2,437.50 and calculated 18% of that. Eighteen percent came
22 to \$438.75. The master then deviated downward \$70 due to Father's responsibility to support
23 another child and settled on a child support obligation of \$369.

24 Because Mother testified that no arrears were owed the master so noted in the Miscellaneous
25 section of the MROJ. Consequently, the only payment recommendation made by the master was
26 that Father should pay \$369 per month in child support and that this money should be paid through
27 the government child support enforcement program as directed on page 2 of the MROJ.
28

1 Father now objects to the recommendation and cites as his reason for objecting that Father
2 did not have legal representation and that he "wasn't given the opportunity to show any evidence
3 that I support Kyree Cage." Father then follows that statement with parentheses in which he has
4 written, "reciepts, [sic] lease agreement, etc."

5
6 D.A. Family Support, ("DAFS"), sees no error by the master and requests that this Court
7 approve and adopt the master's recommendation as submitted.

8 **LEGAL ANALYSIS**

9 **STANDARD OF REVIEWS ON OBJECTION – CLEARLY ERRONEOUS**

10
11 The standard of review on objections is set forth in two places, at NRS 425.3844(3)(a) and at
12 EDCR 1.40(d). Both state that the District Court shall accept the master's recommendations unless
13 they are clearly erroneous.

14 Here, there is no error by the master. She determined Respondent's gross monthly income
15 according to Father's own testimony, correctly calculated 18% and then gave Father a downward
16 deviation of \$70 per month in consideration of Father's obligation to support another minor child.

17 Furthermore, the master expressly referenced Mother's testimony that she did not seek
18 arrears, (meaning that no arrears exist).

19 Under these circumstances it would not be surprising if, indeed, the master did not permit
20 Father to go on and on about all the things he did to support Kyree. No one is arguing that point.
21 Assuming it is true, that is wonderful. It is, simply, not relevant when no arrears are alleged. As far
22 as the master and DAFS are concerned, it sounds as though Mr. Cage is a great father. If he has
23 provided things in the past, that is wonderful. That is precisely why the master found, after hearing
24 from Mother that she was not alleging or requesting arrears, that Father owed no arrears.

25 If, on the other hand, Father's desire is that the courts not order him to pay child support
26 because he would rather handle the support obligation by paying Mother's rent or some such thing,
27 then DAFS must oppose such a suggestion. Mother has filed an application for child support. She
28 is entitled by law – see, generally, NRS Chapter 125B and Chapter 425 – to have Father pay her
child support and to have it collected through the government child support enforcement program.

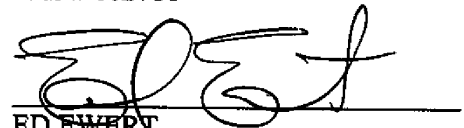
1 If Father is providing other forms of support to Mother and the child his option today is to
2 stop providing that other support. In the eyes of the law, as long as he is paying \$369 per month he
3 is paying all that the law requires of him under the circumstances.

4 WHEREFORE, for the foregoing reasons DAFS prays that this Court approve and adopt the
5 master's Recommendation as submitted.

6 DATED this 18th day of April, 2007.

8 Respectfully Submitted,
9 DAVID ROGER
10 DISTRICT ATTORNEY
11 Nevada Bar # 002781

12 BY:

13 
14 ED EWERT
15 Deputy District Attorney
16 Nevada Bar No. 3405

17 **CERTIFICATE OF MAILING**

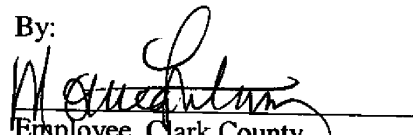
18 I hereby certify that service of the above DISTRICT ATTORNEY'S OPPOSITION TO
19 RESPONDENT'S OBJECTION in case number R-236990 was made this 18th day of
20 April, 2007, by depositing a copy of same in the U.S. mail, postage pre-paid,
21 addressed to:

22 Malika Coppedge, Petitioner
23 (at address on file in DAFS records)

24 AND TO:

25 Kori Cage
26 6650 Warm Springs Rd. #2102
27 Las Vegas, NV 89118
28 Respondent in proper person

By:


Employee, Clark County
District Attorney's Office
Family Support Division

DAVID ROGER
DISTRICT ATTORNEY
Nevada Bar No. 002781
FAMILY SUPPORT DIVISION
301 Clark Avenue, Suite 100
Las Vegas, Nevada 89101
(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)
Dept. J

District Court
CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human Services,
Div. Of Welfare & Supportive Services,
and (Malika Coppedge),

Petitioner,

vs.

Kori L Cage,

Respondent.

Case No. R136990

Department No. CHILD SUPPORT

MASTER'S RECOMMENDATION

☐ See ORDER/JUDGMENT attached ☐ See REMAND attached; ORDER/JUDGMENT not approved

This matter having been heard on April 05, 2007 before the undersigned Hearing Master, having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

FINDINGS OF FACT and CONCLUSIONS OF LAW: Initial hrg. Parents never married but Respondent is named as child's father on NV birth certificate. See MISC. re income.

☒ Respondent present ☐ Respondent's attorney present ☐ Petitioner present ☐ Petitioner's attorney present

Respondent's gross monthly income (gmi): \$2,437.50; formula amount 18% of gmi = \$ 438.75

Basis for deviation from state formula: _____

RECOMMENDATION: ☐ By stipulation

Respondent is to pay current support for the child(ren), Kyree Cage.

Respondent is to pay monthly:

Arrears period is 9/06 through 3/07.

\$369.00

child support

medical support (payment in lieu of health insurance)

spousal support

arrears payment to be applied to:

Interest and penalty are not included in this order. In a subsequent order interest and penalty may be added as far back as state regulations allow.

child support arrearages of _____

plus interest of _____

Penalties of _____

medical support arrearages of _____

plus interest of _____

Penalties of _____

spousal support arrearages of _____

plus interest of _____

medical expense arrearages of _____

genetic test costs of _____

(to be paid after all other arrearages are paid in full).

total arrearages of _____

total interest _____

Total penalty _____

Grand Total (arrearages + interest + penalties) = _____

\$ 369.00

TOTAL monthly payment to be paid on or before the 30th day of the month, with the next payment due April 30, 2007 and continuing thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

☐ The total arrears are hereby confirmed.

☐ The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095.

☐ Arrears of \$ _____ subject to modification until _____, and arrears of \$ _____ reduced to judgment.

☐ Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.

☐

Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

☒ Good cause being found by the Court said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support No arrears.

Exhibit 1

All payments made by mail MUST be made in the form of a cashier's check, money order or business check ONLY, made payable to State Collection and Disbursement Unit (SCaDU) and mailed to State Collection and Disbursement Unit (SCaDU), P.O. Box 98950, Las Vegas, Nevada 89193-8950. Payments also may be made in person at State Collection and Disbursement Unit, 3120 E. Desert Inn Road, Las Vegas, Nevada, in the exact amount of cash, cashier's check, money order or business check ONLY. Additionally, the following information must be included with each payment: name (first, middle, last) of person responsible for paying child support, social security number of person responsible for paying child support, child support case number, and name of custodian (first and last name of person receiving child support). NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.

- ☐ Genetic testing ordered, and parties must comply.
☒ Respondent is hereby ☐ found/ ☒ confirmed to be the father of Kyree Cage, born 12-03-04, _____, born _____, _____
☐ by admission. ☐ per genetic testing. ☐ by default. ☒ by affidavit of paternity. ☐ by prior order. ☐ see misc.

THIS SECTION REGARDING CONTEMPT DOES NOT APPLY UNLESS CHECKED.

- ☐ **RESPONDENT ORDERED TO SHOW CAUSE CONCERNING CONTEMPT.** ☐ **ORDER TO SHOW CAUSE CONTINUED TO NEXT COURT DATE.**
☐ Respondent is hereby found in Contempt of Court and sentenced to _____ days in the Clark County Detention Center; this sentence shall be stayed until the next court date.
☐ The following sentence(s) shall be stayed/continued to the next court date unless imposed or vacated today:
Sentence of _____ days in the Clark County Detention Center issued _____ is _____ imposed _____ vacated _____ stayed
Sentence of _____ days in the Clark County Detention Center issued _____ is _____ imposed _____ vacated _____ stayed
Sentence of _____ days in the Clark County Detention Center issued _____ is _____ imposed _____ vacated _____ stayed
Sentence of _____ days in the Clark County Detention Center issued _____ is _____ imposed _____ vacated _____ stayed
☐ Respondent is recommended for the day arrest program on _____.
☐ Respondent to be released from custody on _____.
☐ Respondent may be released from the above sentence immediately upon payment of \$_____ to be released to Petitioner as child support.
☐ Respondent to keep a daily list of _____ places per _____ day he/she looked for employment to be submitted at the next hearing.
☐ Respondent is referred to employment services for an appointment on _____ at _____ AM.
☐ Respondent to bring new financial statement and proof of income next date.
☒ Respondent to provide health insurance coverage for the minor child(ren) herein:
☒ if available through employer. ☐ per court order. ☒ already provided for the child(ren).
☐ Petitioner has satisfactory health insurance, other than Medicaid, for the child(ren) at this time.
☐ Respondent to provide proof of said insurance and _____ insurance cards/claim forms to the District Attorney's Office, Family Support Division within _____ days of today's date.
☐ **NO BAIL BENCH WARRANT HEREBY ISSUED FOR THE ARREST OF RESPONDENT.** ☐ **STAYED FOR _____ DAYS.**
☐ **RESPONDENT MAY BE RELEASED UPON PAYMENT OF \$_____ TO BE RELEASED TO PETITIONER AS CHILD SUPPORT.**
☐ **BENCH WARRANT PREVIOUSLY ISSUED IS HEREBY** ☐ **QUASHED.** ☐ **CONTINUED.**
☐ Respondent to see District Attorney Case Manager with documentation re: _____ by _____.

ESTABLISHMENT OF CONTROLLING ORDER:

- ☒ This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.
☐ Nevada is hereby establishing a controlling order because there exist multiple, prior support orders from two or more states; yet, no individual party or child(ren) lives in any of those prior order-issuing states.

ENFORCEMENT OF CONTROLLING ORDER:

- ☐ The registered order from _____, dated _____,
#_____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

MISCELLANEOUS RECOMMENDATION: Employer-reported wages for April, 2006 thru Dec., 2006, from Enterprise Leasing (Rentacar) yield average gross monthly income of \$2,767.37. Respondent's testimony was that he earns \$11.25 per hour at 50 hours per week which is a Gross Monthly Income of \$2,437.50.

Respondent has a newborn child. A copy of the birth certificate or Affidavit of Paternity to be provided to DA within 30 days. A deviation of \$70/month.

Regarding health insurance, once respondent provides DA with proof of the cost of the health insurance for the child only, then DA will provide an offset effective April 2007.

Regarding arrears, petitioner does not request back child support.

ADDITIONAL NOTICES: Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095. If the Respondent pays support through income withholding and the full obligation is not met by the amount withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be subject to assessment of penalties and interest. The Respondent may avoid these additional costs by making current support payments each month. If another state takes jurisdiction and obtains a new order, Nevada interest and penalties will only be calculated to the date of the new order and will be enforced.

☐ Page 3(a) with additional Recommendations.

IT IS FURTHER ORDERED that Respondent **MUST** advise the District Attorney's Office, Family Support Division, **WITHIN TEN (10) DAYS OF EVERY** change in home address, telephone number and/or employment, address and telephone number.

This matter is continued to off calendar in Child Support Court at Family Court, 601 N. Pecos Road, Las Vegas, Nevada for further proceedings.

This order does not stay collection of support arrears by execution or other means allowed by law.

NOTICE: Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and Nevada State Welfare, where there is an assignment of support rights to the State, has the right to request a review of support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this purpose may be obtained from D.A. Family Support at 301 Clark Avenue, Suite 100, Las Vegas, Nevada 89101.

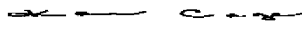
DATED: April 05, 2007

Hearing Master's
Signature was applied
But has been removed
For security purposes.

MASTER

NOTICE: Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in Final Order/Judgment being ordered by District Court. However, the Master's Recommendation is not an Order/Judgment unless signed and filed by a Judge.

☐ The Respondent waives the ten (10) days for objection to the Master's Recommendation.
Receipt of the Master's Recommendation is acknowledged by my signature below.


Respondent/Respondent's Attorney

ORDER/JUDGMENT

The Court, having reviewed the above and foregoing Master's Recommendation,

- ☐ the Respondent having waived the right to object thereto,
- ☐ no timely objection having been filed thereto,
- ☐ having received the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

- ☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted this ____ day of ____, 20____.
☐ Except as otherwise provided on Addendum page 5 which is attached hereto and incorporated herein.
- ☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this ____ day of ____, 20____ and this matter is remanded to Child Support Court on ____, 20____ at ____ M.
☐ See information provided on Addendum page 5 which is attached hereto and incorporated herein.

District Court Judge, Family Division

DAVID ROGER, Clark County District Attorney
Nevada Bar No. 002781

By: 
DEPUTY DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
301 Clark Avenue, Suite 100
Las Vegas, Nevada 89101

NOTICE: Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written Notice of Entry of Judgment.

1 **ORDR**
2 **DAVID ROGER**
3 **DISTRICT ATTORNEY**
4 Nevada Bar No. 002781
5 **FAMILY SUPPORT DIVISION**
6 301 Clark Avenue, Suite 100
7 Las Vegas, Nevada 89101
8 (702) 671-9200

ORIGINAL

FILED

JUN 22 11 38 AM '07

Clark
CLERK OF THE COURT

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

9 NEVADA DEPT. OF HEALTH & HUMAN
10 SERVICES, DIV. OF WELFARE &
11 SUPPORT SERVICES, and
(Malike Coppedge),

Case No.: R - 136990

Dept. No. J

12 Petitioner(s), (Child Support Court)

13 vs.

14 Kori L. Cage,

15 Respondent

16 **ORDER ON OBJECTION**

17 This matter having come on for hearing this 12th day of June, 2007, on the Objection of the:
18 ☒ Respondent ☐ Petitioner ☐ District Attorney's Office, Family Support Division, (hereinafter,
19 "DAFS"), to the Master's Recommendations from the Child Support Court hearing held on the 5th
20 day of April, 2007;

21 Respondent being ☐ not present ☒ present

22 Respondent's attorney, , Esq., being ☐ present ☐ not present,

23 Petitioner being ☒ present ☐ not present and David Roger, District Attorney, being
24 present by and through Deputy District Attorney, Ed Ewert, Esq.,

25 **RECEIVED**

JUN 22 2007

CLERK OF THE COURT

RECEIVED

JUN 13 2007

DEPT. J

1 The Court having reviewed the pleadings and papers herein and having heard argument
2 AND GOOD CAUSE THEREFORE APPEARING, this Court hereby enters the following findings,
3 conclusions and orders:

4 This Court finds that: Respondent withdraws his objection.

5 This Court concludes that: the Master's recommendations should be approved as submitted.

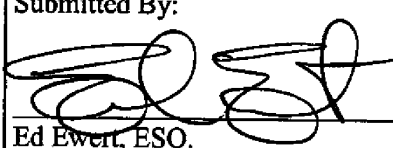
6 ACCORDINGLY, IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the
7 Master's recommendations from the Child Support Court hearing held on April 5, 2007 are hereby
8 approved and adopted in their entirety as submitted, a true and correct copy of which is attached
9 hereto as Exhibit 1 and incorporated by this reference.

10 IT IS FURTHER ORDERED, ADJUDGED AND DECREED this matter is off calendar.

11 DATED this 21 day of June, 20 07.

12
13 
14 LISA M. KENT, DISTRICT COURT JUDGE 

15 Submitted By:

16 
17
18 Ed Ewert, ESQ.
19 DEPUTY DISTRICT ATTORNEY
20 Nevada Bar No. 3405
21 FAMILY SUPPORT DIVISION
22 301 Clark Avenue, Suite 100
23 Las Vegas, Nevada 89101
24 (702) 671-9200
25
26
27
28

DAVID ROGER
DISTRICT ATTORNEY
Nevada Bar No. 002781
FAMILY SUPPORT DIVISION
301 Clark Avenue, Suite 100
Las Vegas, Nevada 89101
(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)
Dept. J

District Court

CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human Services,
Div. Of Welfare & Supportive Services,
and (Malika Coppedge),

Petitioner,

vs.

Kori L Cage,

Respondent.

Case No. R136990

Department No. CHILD SUPPORT

MASTER'S RECOMMENDATION

☐ See ORDER/JUDGMENT attached ☐ See REMAND attached; ORDER/JUDGMENT not approved

This matter having been heard on April 05, 2007 before the undersigned Hearing Master, having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

FINDINGS OF FACT and CONCLUSIONS OF LAW: Initial hrg. Parents never married but Respondent is named as child's father on NV birth certificate. See MISC. re income.

☒ Respondent present ☐ Respondent's attorney present ☐ Petitioner present ☐ Petitioner's attorney present

Respondent's gross monthly income (gmi): \$2,437.50; formula amount 18% of gmi = \$ 438.75

Basis for deviation from state formula: _____

RECOMMENDATION: ☐ By stipulation

Respondent is to pay current support for the child(ren), Kyree Cage.

Respondent is to pay monthly:

Arrears period is 9/06 through 3/07.

\$369.00

child support

medical support (payment in lieu of health insurance)

spousal support

arrears payment to be applied to:

Interest and penalty are not included in this order. In a subsequent order interest and penalty may be added as far back as state regulations allow.

child support arrearages of _____

medical support arrearages of _____

spousal support arrearages of _____

medical expense arrearages of _____

genetic test costs of _____

total arrearages of _____

plus interest of _____

plus interest of _____

plus interest of _____

Penalties of _____

Penalties of _____

(to be paid after all other arrearages are paid in full).

total interest _____

Total penalty _____

Grand Total (arrearages + interest + penalties) = _____

\$ 369.00

TOTAL monthly payment to be paid on or before the 30th day of the month, with the next payment due April 30, 2007 and continuing thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

☐ The total arrears are hereby confirmed.

☐ The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095.

☐ Arrears of \$ _____ subject to modification until _____, and arrears of \$ _____ reduced to judgment.

☐ Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.

☐

Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

☒ Good cause being found by the Court said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support No arrears.

Exhibit 1

CASE NO. R136990

All payments made by mail MUST be made in the form of a cashier's check, money order or business check ONLY, made payable to State Collection and Disbursement Unit (SCaDU) and mailed to State Collection and Disbursement Unit (SCaDU), P.O. Box 98950, Las Vegas, Nevada 89193-8950. Payments also may be made in person at State Collection and Disbursement Unit, 3120 E. Desert Inn Road, Las Vegas, Nevada, in the exact amount of cash, cashier's check, money order or business check ONLY. Additionally, the following information must be included with each payment: name (first, middle, last) of person responsible for paying child support, social security number of person responsible for paying child support, child support case number, and name of custodian (first and last name of person receiving child support). NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.

- ☐ Genetic testing ordered, and parties must comply.
☒ Respondent is hereby ☐ found/ ☒ confirmed to be the father of Kyree Cage, born 12-03-04, born _____, _____
☐ by admission. ☐ per genetic testing. ☐ by default. ☒ by affidavit of paternity. ☐ by prior order. ☐ see misc.

THIS SECTION REGARDING CONTEMPT DOES NOT APPLY UNLESS CHECKED.

- ☐ **RESPONDENT ORDERED TO SHOW CAUSE CONCERNING CONTEMPT.** ☐ **ORDER TO SHOW CAUSE CONTINUED TO NEXT COURT DATE.**

- ☐ Respondent is hereby found in Contempt of Court and sentenced to _____ days in the Clark County Detention Center; this sentence shall be stayed until the next court date.

- ☐ The following sentence(s) shall be stayed/continued to the next court date unless imposed or vacated today:

Sentence of _____ days in the Clark County Detention Center issued _____ is _____ imposed _____ vacated _____ stayed

Sentence of _____ days in the Clark County Detention Center issued _____ is _____ imposed _____ vacated _____ stayed

Sentence of _____ days in the Clark County Detention Center issued _____ is _____ imposed _____ vacated _____ stayed

Sentence of _____ days in the Clark County Detention Center issued _____ is _____ imposed _____ vacated _____ stayed

- ☐ Respondent is recommended for the day arrest program on _____.
☐ Respondent to be released from custody on _____.
☐ Respondent may be released from the above sentence immediately upon payment of \$_____ to be released to Petitioner as child support.

- ☐ Respondent to keep a daily list of _____ places per _____ day he/she looked for employment to be submitted at the next hearing.

- ☐ Respondent is referred to employment services for an appointment on _____ at _____ AM.

- ☐ Respondent to bring new financial statement and proof of income next date.

- ☒ Respondent to provide health insurance coverage for the minor child(ren) herein:

☒ if available through employer. ☐ per court order. ☒ already provided for the child(ren).

- ☐ Petitioner has satisfactory health insurance, other than Medicaid, for the child(ren) at this time.

- ☐ Respondent to provide proof of said insurance and _____ insurance cards/claim forms to the District Attorney's Office, Family Support Division within _____ days of today's date.

- ☐ **NO BAIL BENCH WARRANT HEREBY ISSUED FOR THE ARREST OF RESPONDENT.** ☐ **STAYED FOR _____ DAYS.**

- ☐ **RESPONDENT MAY BE RELEASED UPON PAYMENT OF \$_____ TO BE RELEASED TO PETITIONER AS CHILD SUPPORT.**

- ☐ **BENCH WARRANT PREVIOUSLY ISSUED IS HEREBY** ☐ **QUASHED.** ☐ **CONTINUED.**

- ☐ Respondent to see District Attorney Case Manager with documentation re: _____ by _____.

ESTABLISHMENT OF CONTROLLING ORDER:

- ☒ This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

- ☐ Nevada is hereby establishing a controlling order because there exist multiple, prior support orders from two or more states; yet, no individual party or child(ren) lives in any of those prior order-issuing states.

ENFORCEMENT OF CONTROLLING ORDER:

- ☐ The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

MISCELLANEOUS RECOMMENDATION: Employer-reported wages for April, 2006 thru Dec., 2006, from Enterprise Leasing (Rentacar) yield average gross monthly income of \$2,767.37. Respondent's testimony was that he earns \$11.25 per hour at 50 hours per week which is a Gross Monthly Income of \$2,437.50.

Respondent has a newborn child. A copy of the birth certificate or Affidavit of Paternity to be provided to DA within 30 days. A deviation of \$70/month.

Regarding health insurance, once respondent provides DA with proof of the cost of the health insurance for the child only, then DA will provide an offset effective April 2007.

Regarding arrears, petitioner does not request back child support.

ADDITIONAL NOTICES: Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095. If the Respondent pays support through income withholding and the full obligation is not met by the amount withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be subject to assessment of penalties and interest. The Respondent may avoid these additional costs by making current support payments each month. If another state takes jurisdiction and obtains a new order, Nevada interest and penalties will only be calculated to the date of the new order and will be enforced.

☐ Page 3(a) with additional Recommendations.

IT IS FURTHER ORDERED that Respondent **MUST** advise the District Attorney's Office, Family Support Division, **WITHIN TEN (10) DAYS OF EVERY** change in home address, telephone number and/or employment, address and telephone number.

CASE NO. R136990

This matter is continued to off calendar in Child Support Court at Family Court, 601 N. Pecos Road, Las Vegas, Nevada for further proceedings.

This order does not stay collection of support arrears by execution or other means allowed by law.

NOTICE: Pursuant to NRS 125B.145 and federal law, **EITHER** parent, the legal guardian, and Nevada State Welfare, where there is an assignment of support rights to the State, has the right to request a review of support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this purpose may be obtained from D.A. Family Support at 301 Clark Avenue, Suite 100, Las Vegas, Nevada 89101.

DATED: April 05, 2007

Hearing Master's
Signature was applied
But has been removed
For security purposes.

MASTER

NOTICE: Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in Final Order/Judgment being ordered by District Court. However, the Master's Recommendation is not an Order/Judgment unless signed and filed by a Judge.

☐ The Respondent waives the ten (10) days for objection to the Master's Recommendation. Receipt of the Master's Recommendation is acknowledged by my signature below.

[Signature]
Respondent/Respondent's Attorney

ORDER/JUDGMENT

The Court, having reviewed the above and foregoing Master's Recommendation,

- ☐ the Respondent having waived the right to object thereto,
- ☐ no timely objection having been filed thereto,
- ☐ having received the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

- ☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted this ____ day of ____, 20__.
- ☐ Except as otherwise provided on Addendum page 5 which is attached hereto and incorporated herein.
- ☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this ____ day of ____, 20__ and this matter is remanded to Child Support Court on ____, 20__ at ____ M.
- ☐ See information provided on Addendum page 5 which is attached hereto and incorporated herein.

District Court Judge, Family Division

DAVID ROGER, Clark County District Attorney
Nevada Bar No. 002781

By: [Signature]
DEPUTY DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
301 Clark Avenue, Suite 100
Las Vegas, Nevada 89101

NOTICE: Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written Notice of Entry of Judgment.

1 NEJ
David Roger, District Attorney
2 Nevada Bar No. 002781
Family Support Division
3 301 Clark Avenue, Suite 100
Las Vegas, Nevada 89101
(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

ORIGINAL

FILED

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Chaf
CLERK OF THE COURT

6 DISTRICT COURT
7 CLARK COUNTY, NEVADA

9 Nevada Dept Of Health & Human Services,
10 Div. Of Welfare & Supportive Services,
(Malika Coppedge),

Petitioner,

11 vs.

12 Kori L Cage,

13 Respondent.)

Case no. R136990

Dept. no. CHILD SUPPORT

14
15 NOTICE OF ENTRY OF ORDER/JUDGMENT

16 To: KORI L CAGE, Respondent

17
18 Please take notice that the enclosed judgment against the respondent KORI L CAGE was entered in the
19 above-entitled matter on June 21, 2007.

20
21 CERTIFICATE OF MAILING

22 The foregoing Notice of Entry of Order/Judgment was served upon Kori Lovett Cage by mailing a copy
23 thereof, first class mail, postage prepaid to 6650 W Warm Springs Rd 2102, Las Vegas, NV 89118 on
24 the 10th day of March, 2008.

25
26 *ep*
Employee, District Attorney's Office
27 Family Support Division
28

NCPOFD

1 COPY
2 David Roger, District Attorney
3 Nevada Bar No. 002781
4 Family Support Division
5 301 Clark Avenue, Suite 100
6 Las Vegas, Nevada 89101
7 (702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

ORIGINAL

FILED

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Cliff
CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

8 Nevada Dept Of Health & Human Services,
9 Div. Of Welfare & Supportive Services,
(Malika Coppedge),

Petitioner,)

10 vs.)

11 KORI L CAGE,

12 Respondent.)
13

Case no. R136990

Dept. no. CHILD SUPPORT

14 COPY OF Order from Clark County, Nevada, dated September 14, 2007 and Letter to Conform
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RECEIVED

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CLERK OF THE COURT

COPYOF

OFFICE OF THE DISTRICT ATTORNEY



DAVID ROGER
District Attorney

Family Support Division

(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

Operational Unit A
301 Clark Ave, #100, Las Vegas, NV 89101
Fax: (702) 366-2320

ROBERT W. TEUTON
Assistant District Attorney

CHRISTOPHER J. LALLI
Assistant District Attorney

MARY-ANNE MILLER
County Counsel

C.A. WATTS
Director

April 3, 2008

KORI LOVETT CAGE
6650 W WARM SPRINGS RD 2102
LAS VEGAS NV 89118

Re: NEVADA DEPT OF HEALTH & HUMAN SERVICES, Div. Of
Welfare & Supportive Services, and (Malika Coppedge) vs. Kori L
Cage
Our case no.: R136990

Dear Kori Lovett Cage:

Our office has received and filed the attached support order. We are currently enforcing the order. If you have a more recent order that overrides this one, please provide a filed copy to this office immediately.

Sincerely,

Approved

A handwritten signature in dark ink, appearing to be "RD Brown", is written over the "Approved" text.

R D Brown
Family Support Specialist

Attachment

cc: Custodial Parent

LAW OFFICES
R. NATHAN GIBBS, LTD.
5280 South Eastern Avenue, Suite D-2
Las Vegas, Nevada 89119

1 NOTC
2 R. Nathan Gibbs, Esq.
3 R. NATHAN GIBBS, LTD.
4 Nevada Bar No. 005965
5 5280 South Eastern Avenue, Suite D-2
6 Las Vegas, Nevada 89119
7 (702) 471-7454
8 Attorneys for Plaintiff, KORI CAGE
9 in an unbundled legal services capacity

DISTRICT COURT

CLARK COUNTY, NEVADA

KORI CAGE,

Plaintiff,

vs.

MALIKA COPPEDGE,

Defendant.

CASE NO. D-07-374223-P
DEPARTMENT "I"

NOTICE OF ENTRY OF ORDER

TO: ALL PARTIES IN INTEREST:

YOU ARE HEREBY GIVEN NOTICE that an ORDER was filed on September 14, 2007.

A copy of said Order is attached hereto.

~~DATED~~ this 19 day of September, 2007.

R. NATHAN GIBBS, LTD.

R. NATHAN GIBBS, ESQ.

Nevada Bar No. 005965

5280 South Eastern Avenue, Suite D-2

Las Vegas, Nevada 89119

Attorneys for Plaintiff, KORI CAGE

in an unbundled legal services capacity

CERTIFICATE OF MAILING

I hereby certify that I am an employee of R. NATHAN GIBBS, LTD., and that on the 19
day of September, 2007, I placed a true and correct copy of the NOTICE OF ENTRY OF ORDER
by regular first class mail at Las Vegas, Nevada with 1st class postage prepaid and addressed as
follows:

Malika Coppedge
2815 W. Ford Avenue, Apt. 2119
Las Vegas, Nevada 89123

Stacy L. Sirlin
An employee of R. NATHAN GIBBS, LTD.

LAW OFFICES
R. NATHAN GIBBS, LTD.
5280 South Eastern Avenue, Suite D-2
Las Vegas, Nevada 89119

LAW OFFICES
R. NATHAN GIBBS, LTD.
5280 South Eastern Avenue, Suite D-2
Las Vegas, Nevada 89119

1 **ORD**

2 R. Nathan Gibbs, Esq.
3 R. NATHAN GIBBS, LTD.
4 Nevada Bar No. 005965
5 5280 South Eastern Avenue, Suite D-2
6 Las Vegas, Nevada 89119
7 (702) 471-7454
8 Attorneys for Plaintiff, **KORI CAGE**
9 in an unbundled legal services capacity

FILED

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Chafin
CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

10 **KORI CAGE,**

11 Plaintiff,

12 vs.

13 **MALIKA COPPEDGE,**

14 Defendant.

CASE NO. D-07-374223-P
DEPARTMENT "I"

Date of Hearing: 7/31/07
Time of Hearing: 9:30 a.m.

ORDER

17 This matter having come on for hearing on the 31st day of July, 2007, in the Family Division,
18 Department I, of the Eighth Judicial District Court, County of Clark; and Plaintiff, KORI CAGE,
19 appearing by and through his attorney of record, R. NATHAN GIBBS, ESQ., of the law offices of
20 R. NATHAN GIBBS, LTD., appearing in an unbundled legal services capacity, and Defendant
21 MALIKA COPPEDGE, appearing in proper person and the Court being fully advised in the
22 premises, both as to subject matter as well as the parties thereto, and that jurisdiction is proper in
23 Nevada, and good cause appearing therefore;

24
25 **IT IS HEREBY ORDERED** that the parties shall follow a TEMPORARY TIMESHARE
26 wherein the parties shall exchange the minor children every two (2) days at 7:00 p.m. with the
27 receiving parent picking up the children, beginning August 1, 2007, with Plaintiff KORI CAGE
28 picking up.

LAW OFFICES
R. NATHAN GIBBS, LTD.
5280 South Eastern Avenue, Suite D-2
Las Vegas, Nevada 89119

1 **IT IS FURTHER ORDERED** that based upon Defendant MALIKA COPPEDGE's
2 representations in open court regarding her earnings, Plaintiff KORI CAGE shall pay child support
3 to Defendant MALIKA COPPEDGE, pursuant to Wright v. Osburn. Said child support obligation
4 is set at \$195.00 per month, minus \$40.00 per month for one-half of the children's health insurance
5 premiums for a total of \$155.00 per month. Child Support shall be due the first day of each month,
6 beginning August 1, 2007.

7
8 **IT IS FURTHER ORDERED** that Plaintiff KORI CAGE shall maintain health insurance
9 for the minor children. The parties will divide any unreimbursed medical expenses using the 30/30
10 rule as described as follows:

11 That any parties incurring an out of pocket expense relating to a minor child will provide a
12 copy of any paperwork regarding that visit within 30 days of the visit, along with a request for
13 contribution for one-half (½) of any out of pocket expense by a parent on behalf of a minor child,
14 the other parent will reimburse the requesting parent in the amount requested within 30 days of
15 receipt of the request for contribution.

16
17 **IT IS FURTHER ORDERED** that based upon Defendant MALIKA COPPEDGE's
18 representations in open court regarding her out of pocket costs for day care, Plaintiff KORI CAGE
19 shall pay to Defendant MALIKA COPPEDGE one-half of the daycare costs, his share being \$138.00
20 per month.

21
22 **IT IS FURTHER ORDERED** that Plaintiff KORI CAGE's total obligation to Defendant
23 MALIKA COPPEDGE for one-half of the daycare and child support is equal to \$293.00 per month.

24
25 **IT IS FURTHER ORDERED** that the parties shall share the costs of the children's supplies
26 for daycare.

LAW OFFICES
R. NATHAN GIBBS, LTD.
5280 South Eastern Avenue, Suite D-2
Las Vegas, Nevada 89119

1 **IT IS FURTHER ORDERED** that Defendant MALIKA COPPEDGE is ADMONISHED
2 in the future to send Plaintiff copies of any pleadings that she may file.
3

4 **NOTICE IS HEREBY GIVEN** that they are subject to the provisions of NRS 31A and
5 125.450 regarding the collection of delinquent child support payments.
6

7 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125.510(6):
8

9 **PENALTY FOR VIOLATION OF ORDER:** *THE ABDUCTION,*
10 *CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION*
11 *OF THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY*
12 *AS PROVIDED IN NRS 193.130. NRS 200.359 provides that every*
13 *person having a limited right of custody to a child or any parent*
14 *having no right of custody to the child who willfully detains, conceals*
15 *or removes the child from the parent, guardian or other person*
16 *having lawful custody or a right of visitation of the child in violation*
17 *of an order of this court, or removes the child from the jurisdiction of*
18 *the court without the consent of either the court or all persons who*
19 *have the right to custody or visitation is subject to being punished for*
20 *a category D felony as provided in NRS 193.130.*

21 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of October 25,
22 1980, adopted by the 14th Session of the Hague Conference on Private International Law apply if a
23 parent abducts or wrongfully retains a child in a foreign country. The parties are also put on notice
24 of the following provisions in NRS 125.510(8):
25

26 *If a parent of the child lives in a foreign country or has*
27 *significant commitment in a foreign country:*

28 (a) *The parties may agree, and the court shall*
include in the order for custody of the child, that the United
States is the country of the habitual residence of the child for
the purposes of applying the terms of the Hague Convention
as set forth in subsection 7.

(b) *Upon motion of one of the parties, the court*
may order the parent to post a bond if the court determines
that the parent poses an imminent risk of wrongfully
removing or concealing the child outside the country of
habitual residence. The bond must be in an amount
determined by the court and may be used only to pay for the
cost of locating the child and returning him to his habitual
residence if the child is wrongfully removed from or
concealed outside the country of habitual residence. The fact
that a parent has significant commitments in a foreign
country does not create a presumption that the parent poses

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R. NATHAN GIBBS, LTD.
5280 South Eastern Avenue, Suite D-2
Las Vegas, Nevada 89119

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an imminent risk of wrongfully removing or concealing the child.

NOTICE IS HEREBY GIVEN of the following provision of NRS 125C.200:

If custody has been established and the custodial parent intends to move his residence to a place outside of this state and to take the child with him, he must, as soon as possible and before the planned move, attempt to obtain the written consent of the noncustodial parent to move the child from this state. If the noncustodial parent refuses to give that consent, the custodial parent shall, before he leaves this state with the child, petition the court for permission to move the child. The failure of a parent to comply with the provisions of this section may be considered as a factor if a change of custody is requested by the noncustodial parent.

NOTICE IS HEREBY GIVEN that either party may request a review of child support pursuant to NRS 125B.145.

DATED and DONE this 12 day of September, 2007.

CHERYL B. MOSS

DISTRICT COURT JUDGE

Respectfully submitted:

R. NATHAN GIBBS, LTD.


R. NATHAN GIBBS, ESQ.
Nevada Bar No. 005965
5280 South Eastern Avenue, Suite D-2
Las Vegas, Nevada 89119
Attorney for Plaintiff, KORI CAGE
in an unbundled legal services capacity

1 CERT

Case no. R136990

2 CERTIFICATE OF MAILING

3 The foregoing Copy of Order from Clark County, Nevada, dated September 14, 2007
4 and Letter to Conform was served upon Malika Coppedge by mailing a copy thereof, first class mail,
5 postage prepaid to:

6
7 Malika Coppedge
8 2815 W Ford Ave 2119
9 Las Vegas, NV 89123

10 on the 15th day of April, 2008



11 Employee, District Attorney's Office
12 Family Support Division

1 CERT

Case no. R136990

2 CERTIFICATE OF MAILING

3 The foregoing Copy of Order from Clark County, Nevada, dated September 14, 2007 and
4 Letter to Conform was served upon Kori Lovett Cage by mailing a copy thereof, first class mail,
5 postage prepaid to:

6
7 KORI LOVETT CAGE
8 6650 W Warm Springs Rd 2102
9 Las Vegas NV 89118

10 on the 15TH day of APRIL, 2008.

11 

12
13 Employee, District Attorney's Office
14 Family Support Division

ORIGINAL

FILED

AUG 21 1 40 PM '08

CLERK OF THE COURT

COPY
David Roger, District Attorney
Nevada Bar No. 002781
Family Support Division
301 Clark Avenue, Suite 100
Las Vegas, Nevada 89101
(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

DISTRICT COURT
CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human Services,)
Div. Of Welfare & Supportive Services,)
(Malika Coppedge),)
Petitioner,)
vs.)
KORI L CAGE,)
Respondent.)

Case no. R136990
Dept. no. CHILD SUPPORT

COPY OF Order from District Court, Clark County, Nevada, dated June 18, 2008 and Letter to
Conform

RECEIVED

AUG 21 2008

CLERK OF THE COURT

COPY OF

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ORDR

(Your name) Malika Coppedge
(Address) 2815 W Ford ave apt 2119
Las Vegas, NV 89123
(Telephone) 503-975-9656
In Proper Person

FILED
JUN 18 8 39 AM '08
CLERK COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

Kori L. Cage)
Plaintiff,)
vs)
Malika N. Coppedge)
Defendant.)

CASE NO.: D-07-374223-P
DEPT. NO.: I
DATE OF HEARING 3-31-08
TIME OF HEARING 9:30am

ORDER

This matter having come on for Hearing on the 31 day of (month) March, (year) 2008, in the Family Division, Department I, of the Eighth Judicial District Court, County of Clark; and Plaintiff, being (circle one) present in Proper Person/not present, and Defendant, being (circle one) present in Proper Person/not present and the Court being fully advised in the premises, both as to subject matter as well as the parties thereto, and that jurisdiction is proper in Nevada, and good cause appearing therefore;

IT IS HEREBY ORDERED that: (fill in the judge's orders below)

¹⁾ Parties shall share JOINT LEGAL and JOINT PHYSICAL CUSTODY of the minor children Parties shall exchange the minor children every (2) days.
²⁾ Plaintiff shall pay 1/2 of daycare costs for the

1 minor children.

2 3.) Plaintiff's CHILD SUPPORT is SET at \$537.00
3 per month plus \$200.00 per month for 1/2
4 of the daycare, plus \$20.00 per month on
5 the ARREARS, for a TOTAL of \$757.00 per
6 month, beginning April 1, 2008.

7
8 4.) Plaintiff's CHILD SUPPORT ARREARS are SET
9 at \$1568.00 through March 31, 2008, Reduced
10 to Judgment.
11

12 5.) Defendant has Medicaid for the minor
13 children.

14 6.) SCOPES shall be run on both Parties
15

16
17 Defendant shall prepare the Order from
18 today's hearing.
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1 **IT IS FURTHER ORDERED** that each party shall submit the information required in NRS
2 125B.055, NRS 125.130 and NRS 125.230 on a separate form to the Court and the Welfare Division
3 of the Department of Human Resources within ten days from the date this Decree is filed. Such
4 information shall be maintained by the Clerk in a confidential manner and not part of the public
5 record. The parties shall update the information filed with the Court and the Welfare Division of the
6 Department of Human Resources within ten days should any of that information become inaccurate.
7

8 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125.510(6):

9 **PENALTY FOR VIOLATION OF ORDER:** THE ABDUCTION, CONCEALMENT
10 OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS
11 PUNISHABLE AS A CATEGORY D FELONY AS PROVIDED IN NRS 193.130.
12 NRS 200.359 provides that every person having a limited right of custody to a child
13 or any parent having no right of custody to the child who willfully detains, conceals
14 or removes the child from a parent, guardian or other person having lawful custody or
15 a right of visitation of the child in violation of an order of this court, or removes the
16 child from the jurisdiction of the court without the consent of either the court or all
17 persons who have the right to custody or visitation is subject to being punished for a
18 category D felony as provided in NRS 193.130.
19

20 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of October 25,
21 1980, adopted by the 14th Session of the Hague Conference on Private International Law apply if a
22 parent abducts or wrongfully retains a child in a foreign country. The parties are also put on notice
23 of the following provisions in NRS 125.510(8):
24

25 If a parent of the child lives in a foreign country or has significant commitments in a foreign
26 country:

27 (a) The parties may agree, and the court shall include in the order for custody of the
28 child, that the United States is the country of habitual residence of the child for the purposes
of applying the terms of the Hague Convention as set forth in subsection 7.

 (b) Upon motion of one of the parties, the court may order the parent to post a bond if
the court determines that the parent poses an imminent risk of wrongfully removing or
concealing the child outside the country of habitual residence. The bond must be in an
amount determined by the court and may be used only to pay for the cost of locating the child
and returning him to his habitual residence if the child is wrongfully removed from or
concealed outside the country of habitual residence. The fact that a parent has significant

1 commitments in a foreign country does not create a presumption that the parent poses an
2 imminent risk of wrongfully removing or concealing the child.

3 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125C.200:

4 If custody has been established and the custodial parent intends to move his residence
5 to a place outside of this state and to take the child with him, he must, as soon as
6 possible and before the planned move, attempt to obtain the written consent of the
7 noncustodial parent to move the child from this state. If the noncustodial parent
8 refuses to give that consent, the custodial parent shall, before he leaves this state with
the child, petition the court for permission to move the child. The failure of a parent
to comply with the provisions of this section may be considered as a factor if a
change of custody is requested by the noncustodial parent.

9 **NOTICE IS HEREBY GIVEN** that they are subject to the provisions of NRS 31A and
10 125.450 regarding the collection of delinquent child support payments.

11 **NOTICE IS HEREBY GIVEN** that either party may request a review of child support
12 pursuant to NRS 125B.145

13
14 DATED this 16 day of June, 2008

15
16
17 CHERYL B. MOSS

18 DISTRICT COURT JUDGE

19 Respectfully submitted:

20
21 (Your signature) _____

22 (Your name) _____
Plaintiff In Proper Person

23
24
25 (Your signature) Melba M. Cappedge

26 (Your name) Melba N. Cappedge
Defendant In Proper Person

OFFICE OF THE DISTRICT ATTORNEY



DAVID ROGER
District Attorney

Family Support Division

(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

Operational Unit A
301 Clark Ave, #100, Las Vegas, NV 89101
Fax: (702) 366-2320

ROBERT W. TEUTON
Assistant District Attorney

CHRISTOPHER J. LALLI
Assistant District Attorney

MARY-ANNE MILLER
County Counsel

C.A. WATTS
Director

July 18, 2008

KORI LOVETT CAGE
6650 W WARM SPRINGS RD 2102
LAS VEGAS NV 89118

Re: NEVADA DEPT OF HEALTH & HUMAN SERVICES, Div. Of
Welfare & Supportive Services, and (Malika Coppedge) vs. Kori L
Cage
Our case no.: R136990

Dear Kori Lovett Cage:

Our office has received and filed the attached support order. We are currently enforcing the order. If you have a more recent order that overrides this one, please provide a filed copy to this office immediately.

Sincerely,

Approved: 

R D Brown
Family Support Specialist

Attachment

cc: Custodial Parent

1 CERT

Case no. R136990

2 CERTIFICATE OF MAILING

3 The foregoing Copy of Order from District Court, Clark County, Nevada, dated June 18, 2008
4 and Letter to Conform was served upon Kori Lovett Cage by mailing a copy thereof, first class mail,
5 postage prepaid to:
6

7 KORI LOVETT CAGE
8 6650 W Warm Springs Rd 2102
9 Las Vegas NV 89118

10 on the 30th day of July, 2008.

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13 Employee, District Attorney's Office
14 Family Support Division
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David Roger, District Attorney
Nevada Bar No. 002781
Family Support Division
301 Clark Avenue #100
Las Vegas, Nevada 89101
(702) 671-4200 - TDD (702) 385-7486 (for the hearing impaired)

1 CERT

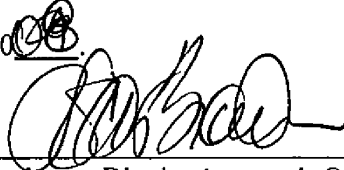
Case no. R136990

2 CERTIFICATE OF MAILING

3 The foregoing Copy of Order from District Court, Clark County, Nevada, dated June 18,
4 2008 and Letter to Conform was served upon Malika Coppedge by mailing a copy thereof, first class
5 mail, postage prepaid to:

6
7 Malika Coppedge
8 2815 W Ford Ave 2119
9 Las Vegas, NV 89123

10 on the 30th day of July, 2008.

11 
12 Employee, District Attorney's Office
13 Family Support Division
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David Rogers, District Attorney
Nevada Bar No. 002781
Family Support Division
301 Clark Avenue #100
Las Vegas, Nevada 89101
(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

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ORIGINAL

COPY
David Roger, District Attorney
Nevada Bar No. 002781
Family Support Division
301 East Clark Avenue, Suite 100
Las Vegas, Nevada 89101
(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

FILED

DEC 3 9 19 AM '08

Cheryl
CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human Services,)
Div. Of Welfare & Supportive Services,)
(Malika Coppedge),)
Petitioner,)
vs.)
KORI L CAGE,)
Respondent.)

Case no. R136990
Dept. no. CHILD SUPPORT

COPY OF Order from District Court, Clark County, Nevada dated September 25, 2008 and Letter to
Conform

RECEIVED
DEC 03 2008
CLERK OF THE COURT

COPY OF

1 ORDER
2 (Your name) Kori Cage
3 (Address) P.O. Box 401562
4 Las Vegas, NV 89140
5 (Telephone) (702) 355-3422
6 In Proper Person

FILED
SEP 25 9 20 AM '08
CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

9 Kori Cage)
10 Plaintiff,)
11 vs)
12)
13 Malika Coppedge)
14 Defendant.)
15)
16)

CASE NO.: D-07-374223-P
DEPT. NO.: I
DATE OF HEARING 8/27/08
TIME OF HEARING 9:30am

ORDER

17 This matter having come on for Hearing on the 27 day of (month) August,
18 (year) 2008, in the Family Division, Department I, of the Eighth Judicial District
19 Court, County of Clark; and Plaintiff, being (circle one) present in Proper Person/not present, and
20 Defendant, being (circle one) present in Proper Person/not present and the Court being fully advised
21 in the premises, both as to subject matter as well as the parties thereto, and that jurisdiction is proper
22 in Nevada, and good cause appearing therefore;

IT IS HEREBY ORDERED that: (fill in the judge's orders below)

- 23 1. Plaintiffs Motion to Review and adjust
24 Child Support is Denied at This time.
25 2. Based on Plaintiffs gross income of \$3001.00
26 per month, child support is set at 540.00 per
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month.

3. Plaintiff's daycare expenses are eliminated immediately.

4. Return hearing Date set.

1 **IT IS FURTHER ORDERED** that each party shall submit the information required in NRS
2 125B.055, NRS 125.130 and NRS 125.230 on a separate form to the Court and the Welfare Division
3 of the Department of Human Resources within ten days from the date this Decree is filed. Such
4 information shall be maintained by the Clerk in a confidential manner and not part of the public
5 record. The parties shall update the information filed with the Court and the Welfare Division of the
6 Department of Human Resources within ten days should any of that information become inaccurate.

7
8 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125.510(6):

9 **PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT**
10 **OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS**
11 **PUNISHABLE AS A CATEGORY D FELONY AS PROVIDED IN NRS 193.130.**
12 NRS 200.359 provides that every person having a limited right of custody to a child
13 or any parent having no right of custody to the child who willfully detains, conceals
14 or removes the child from a parent, guardian or other person having lawful custody or
15 a right of visitation of the child in violation of an order of this court, or removes the
16 child from the jurisdiction of the court without the consent of either the court or all
17 persons who have the right to custody or visitation is subject to being punished for a
18 category D felony as provided in NRS 193.130.

19
20 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of October 25,
21 1980, adopted by the 14th Session of the Hague Conference on Private International Law apply if a
22 parent abducts or wrongfully retains a child in a foreign country. The parties are also put on notice
23 of the following provisions in NRS 125.510(8):

24 If a parent of the child lives in a foreign country or has significant commitments in a foreign
25 country:

26 (a) The parties may agree, and the court shall include in the order for custody of the
27 child, that the United States is the country of habitual residence of the child for the purposes
28 of applying the terms of the Hague Convention as set forth in subsection 7.

 (b) Upon motion of one of the parties, the court may order the parent to post a bond if
the court determines that the parent poses an imminent risk of wrongfully removing or
concealing the child outside the country of habitual residence. The bond must be in an
amount determined by the court and may be used only to pay for the cost of locating the child
and returning him to his habitual residence if the child is wrongfully removed from or
concealed outside the country of habitual residence. The fact that a parent has significant

1 commitments in a foreign country does not create a presumption that the parent poses an
2 imminent risk of wrongfully removing or concealing the child.

3 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125C.200:

4 If custody has been established and the custodial parent intends to move his residence
5 to a place outside of this state and to take the child with him, he must, as soon as
6 possible and before the planned move, attempt to obtain the written consent of the
7 noncustodial parent to move the child from this state. If the noncustodial parent
8 refuses to give that consent, the custodial parent shall, before he leaves this state with
9 the child, petition the court for permission to move the child. The failure of a parent
10 to comply with the provisions of this section may be considered as a factor if a
11 change of custody is requested by the noncustodial parent.

12 **NOTICE IS HEREBY GIVEN** that they are subject to the provisions of NRS 31A and
13 125.450 regarding the collection of delinquent child support payments.

14 **NOTICE IS HEREBY GIVEN** that either party may request a review of child support
15 pursuant to NRS 125B.145

16 DATED this 19 day of Sept., 2008.

17 
18 DISTRICT COURT JUDGE (u) VR

19 Respectfully submitted:

20
21 (Your signature) Kori Cage

22 (Your name) Kori Cage
23 Plaintiff In Proper Person

24
25 (Your signature) _____

26 (Your name) _____
27 Defendant In Proper Person
28

OFFICE OF THE DISTRICT ATTORNEY



DAVID ROGER
District Attorney

Family Support Division

(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

Operational Unit A
301 E. Clark Ave, #100, Las Vegas, NV 89101
Fax: (702) 366-2320

TERESA M. LOWRY
Assistant District Attorney

CHRISTOPHER J. LALLI
Assistant District Attorney

MARY-ANNE MILLER
County Counsel

C.A. WATTS
Director

October 21, 2008

KORI LOVETT CAGE
6650 W WARM SPRINGS RD 2102
LAS VEGAS NV 89118

Re: NEVADA DEPT OF HEALTH & HUMAN SERVICES, Div. Of
Welfare & Supportive Services, and (Malika Coppedge) vs. Kori L
Cage
Our case no.: R136990

Dear Kori Lovett Cage:

Our office has received and filed the attached support order. We are currently enforcing the order. If you have a more recent order that overrides this one, please provide a filed copy to this office immediately.

Sincerely,

Approved: 

R D Brown
Family Support Specialist

Attachment

cc: Custodial Parent

1 CERT

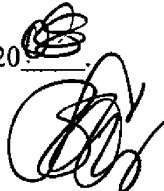
Case no. R136990

2 CERTIFICATE OF MAILING

3 The foregoing Copy of Order from District Court, Clark County, Nevada dated September 25,
4 2008 and Letter to Conform was served upon Kori Lovett Cage by mailing a copy thereof, first class
5 mail, postage prepaid to:
6

7 KORI LOVETT CAGE
8 6650 W Warm Springs Rd 2102
9 Las Vegas NV 89118

10 on the 20th day of November, 2008

11 
12
13 Employee, District Attorney's Office
14 Family Support Division
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David Rager, District Attorney
Nevada Bar No. 902781
Family Support Division
301 East Clark Avenue #100
Las Vegas, Nevada 89101
(702) 671-9200 - TDD (702) 382-7486 (for the hearing impaired)

1 CERT

Case no. R136990

2 CERTIFICATE OF MAILING

3 The foregoing Copy of Order from District Court, Clark County, Nevada dated
4 September 25, 2008 and Letter to Conform was served upon Malika Coppedge by mailing a copy
5 thereof, first class mail, postage prepaid to:

6
7 Malika Coppedge
8 2815 W Ford Ave 2119
9 Las Vegas, NV 89123

10 on the 20th day of NOVEMBER, 2008

11 
12 Employee, District Attorney's Office
13 Family Support Division
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1 NOTC
2 David Roger, District Attorney
3 Nevada Bar No. 002781
4 Family Support Division
5 301 East Clark Avenue, Suite 100
6 Las Vegas, Nevada 89101
7 (702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

ORIGINAL

FILED

FEB 18 12:40 PM '09


CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

8 Nevada Dept Of Health & Human Services,)
9 Div. Of Welfare & Supportive Services,)
10 and (Malika Coppedge),)

Petitioner,)

Case no. R136990

vs.)

Dept. no. CHILD SUPPORT

11 Kori L Cage,)

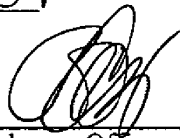
12 Respondent.)

13
14 NOTICE TO CEASE CURRENT SUPPORT

15 The District Attorney Family Support Division has ceased the collection of current child
16 support on the above referenced case effective January 31, 2009.

17 The District Attorney Family Support Division will continue to collect on arrears accrued
18 under this order due the State of Nevada Division of Welfare or the petitioner.

19 Dated 5th day of February, 2009

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21 
22 Employee, Office of the District Attorney
23 Family Support Division
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RECEIVED
FEB 18 2009
CLERK OF THE COURT

NOTES

1 NOTM
2 Steven B. Wolfson, District Attorney
3 Nevada Bar No. 001565
4 Family Support Division
5 1900 East Flamingo Road, Suite 100
6 Las Vegas, Nevada 89119-5168
7 (702) 671-9200 - TTY and/or other relay services: 711
8 437763100A

Electronically Filed
11/4/2019 2:37 PM
Steven D. Grierson
CLERK OF THE COURT



6 DISTRICT COURT
7 CLARK COUNTY, NEVADA

8 Nevada Dept Of Health & Human Services,)
9 Div. Of Welfare & Supportive Services,)
10 and (Malika Coppedge),)

Case no. R136990

11 Petitioner,)

Dept. no. CHILD SUPPORT

12 vs.)

Oral Argument Requested:

13 Kori L Cage,)

Yes ☒ No ☐

14 Respondent.)

15 NOTICE: You are required to file a written response to this motion with the Clerk of the
16 Court and to provide the undersigned with a copy of your response within ten (10) days
17 of your receipt of this motion. Failure to file a written response with the Clerk of the
Court within ten (10) 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.

18 DISTRICT ATTORNEY'S NOTICE OF MOTION &
19 MOTION TO MODIFY CHILD SUPPORT

20 Date of Hearing: DECEMBER 13, 2019
21 Time of Hearing: 09.15 AM
22 Court Room: 1

23 The District Attorney, by and through the undersigned Deputy District Attorney,
24 moves the above entitled Court for review and adjustment of the child support order
25 previously entered between the above-entitled parties, including provision for medical
insurance or contribution toward Petitioner's cost of providing medical insurance, if any.

26 This Motion is made and based upon the pleadings and papers on file herein and
27 the attached Points and Authorities, exhibit(s), if any, oral argument, if any, at the time of
28 the hearing and

MOTMOD

Page 1 of 7

1 NOTICE OF HEARING

2 TO: Kori Lovett Cage, Respondent:

3 You will please take notice that the District Attorney's Office, Family Support
4 Division, will bring the above and foregoing motion on for hearing in the Child Support
5 Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las
6 Vegas, Nevada, on DECEMBER 13, 2019 at 09.15 AM in Court Room 1, or as soon
7 thereafter as the case may be heard.

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Steven B. Wolfson, District Attorney
Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TTY and/or other relay services: 711

1 POINTS AND AUTHORITIES IN SUPPORT OF THE MOTION

2 A review of a support order can be requested by either party or, in a welfare case,
3 by the District Attorney's Office, at least every three years pursuant to NRS 125B.145
4 (1). "Support" includes not only financial maintenance, but also support for a child's
5 health care and educational needs. NRS 125B.020. The Court has authority to adjust an
6 order if the moving party has demonstrated changed circumstances since the order was
7 last entered. Rivero v. Rivero, 125 Nev. Adv. Op. No. 43, 216 P.3d 213 (2009). A
8 modification may also be made on an order less than three years old. Likewise, the
9 moving party must show changed circumstances. NRS 125B.145(4).

10 NRS 125B.145(4) declares that "[a]n order for the support of a child may be
11 reviewed at any time on the basis of changed circumstances" and adds that a change of
12 20% or more in a child support obligor's gross monthly income "shall be deemed to
13 constitute changed circumstances requiring a review for modification of the order for the
14 support of a child." Fernandez v. Fernandez, 126 Nev. Adv. Op. No. 3, 222 P.3d 1031
15 (2010). Changed circumstances may also include other events in the lives of the parties
16 such as emancipation or the addition of a new child to the family.

17 The statutory formula for child support is stated in NRS 125B.070 and NRS
18 125B.080. Specifically, NRS 125B.070 (1)(b) requires the Court to set support using the
19 non-custodial parent's gross monthly income and applying 18% for one child, 25% for
20 two children, 29% for three children, and 2% more for each child thereafter. The Court
21 may further increase or decrease support by considering certain factors or deviations
22 listed in NRS 125B.080(9).

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Steven B. Wolfson, District Attorney
Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TTY and/or other relay services: 711

1 It is respectfully requested that this Honorable Court determine the Respondent's
2 gross monthly income or, in the alternative, impute earning capacity. The support order
3 should be adjusted as appropriate, and address health insurance, if available at a
4 reasonable cost. If the Petitioner carries health insurance for the child, the order should
5 require the Respondent to contribute to the cost of the health insurance for the child upon
6 a showing of proof.

7 Dated on Nov-04-2019.

8 Respectfully Submitted,
9 Steven B. Wolfson
10 Clark County District Attorney
11 Nevada Bar #001565

12 
13 Deputy District Attorney

1 CERT

Case no. R136990

2 CERTIFICATE OF MAILING

3 The foregoing DISTRICT ATTORNEY'S NOTICE OF MOTION & MOTION TO
4 MODIFY CHILD SUPPORT was served upon Kori Lovett Cage by mailing a copy
5 thereof, first class mail, postage prepaid to:

6 Kori Lovett Cage
8655 Rowland Bluff Ave
7 Las Vegas NV 89178

8 on 11/4/2019 2:34 PM.

10 
11 Employee, District Attorney's Office
12 Family Support Division

1 CERT

Case no. R136990

2 CERTIFICATE OF MAILING

3 The foregoing DISTRICT ATTORNEY'S NOTICE OF MOTION & MOTION TO
4 MODIFY CHILD SUPPORT was served upon Malika Coppedge by mailing a copy
5 thereof, first class mail, postage prepaid to:

6 Malika Coppedge
7 5961 Tunbridge Ave
8 Las Vegas, NV 89139

9 on **11/4/2019 2:34 PM**

10 
11 Employee, District Attorney's Office
12 Family Support Division
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Steven D. Grierson

1 **OPPC**
2 **GHANDI DEETER BLACKHAM**

3 Nedda Ghandi, Esq.
Nevada Bar No. 11137
4 Email: nedda@ghandilaw.com
Brian E. Blackham, Esq.
5 Nevada Bar No. 9974
Email: brian@ghandilaw.com
6 725 S. 8th Street, Suite 100
Las Vegas, Nevada 89101
7 Telephone: (702) 878-1115
Facsimile: (702) 979-2485
Attorneys for Malika Coppedge

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 Nevada Dept Of Health & Human
11 Services, Div. Of Welfare & Supportive
Services, and (Malika Coppedge),

12 Petitioner,

13 vs.

14 Kori L. Cage,

15 Respondent.

Case No.: 06R136990

Dept. No.: CHILD SUPPORT

Date of Hearing: December 13, 2019

Time of Hearing: 9:15 a.m.

Court Room: 1

ORAL ARGUMENT REQUESTED:
YES

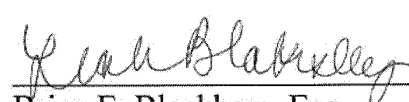
16 **MALIKA COPPEDGE'S OPPOSITION TO DISTRICT ATTORNEY'S**
17 **NOTICE OF MOTION & MOTION TO MODIFY CHILD SUPPORT AND**
18 **COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS**

18 Malika Coppedge, (Mailka) by and through her attorney of record, Brian E.
19 Blackham, Esq. of GHANDI DEETER BLACKHAM and hereby submits this
20 Opposition and Countermotion.

1 This Opposition and Countermotion is based upon the papers and pleadings
2 on file herein, the Memorandum of Points and Authorities and Arguments set forth
3 herein, the Affidavit of Malika, and any oral argument of counsel to be adduced at
4 the time of the hearing in this matter.

5 Dated this 26 day of November, 2019.

6 GHANDI DEETER BLACKHAM

7  #12808 for:
8 Brian E. Blackham, Esq.
9 Nevada Bar No. 9974
10 725 S. 8th Street, Suite 100
11 Las Vegas, NV 89101
12 Attorney for Malika Coppedge
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1 **MEMORANDUM POINTS AND AUTHORITIES**

2 **I.**

3 **STATEMENT OF FACTS**

4 **A. Background and Preliminary Matters:**

5 Malika and Respondent Kori Cage (Kori) were never married. However, there
6 are two minor children the issue of their relationship, to wit: Kyree Lovett Cage
7 (Kyree), born December 3, 2004, and Jayla Nicole Cage (Jayla), born February 20,
8 2007.

9 At the outset, the Court should note that despite the Certificate of Service
10 attached to the underlying motion noting service to Malika on November 4, 2019,
11 Malika did not receive a copy of the Motion in the mail until November 17, 2019.
12 Upon being retained thereafter, undersigned counsel's office worked diligently to
13 prepare and file the instant Opposition given the time in which an Opposition was
14 supposed to be filed but was not due to Malika not receiving a timely copy of the
15 Motion.

16 **B. Governing Financial Orders:**

17 Pursuant to the Findings of Fact, Conclusions of Law, Decision and Orders
18 (FFCLJ), entered by the District Court in case no. D-07-374223-P on April 23, 2018,
19 Malika was awarded primary physical custody of the minor children, subject to
20

1 Kori's right to specified visitation.¹ Based on the custodial timeshare, and Kori's
2 reported income of \$3,262.44 Malika was awarded child support in the amount of
3 \$815.61.² Kori was ordered to maintain health insurance for the minor children, with
4 the parties sharing equally in the cost of unreimbursed medical expenses.³

5 Since the entry of the FFCLJ, and although Malika has not seen any
6 supporting documentation, Kori now alleges that he was terminated from his
7 employment, and is only earning approximately \$1,811.33 per month in
8 unemployment benefits. Because of his alleged termination, Kori also lost his ability
9 to provide health insurance for the minor children, which he was previously ordered
10 to maintain. As a result, Kori has requested that his child support obligation be
11 modified and/or suspended based on his alleged termination in employment. It is
12 unbeknownst to Malika whether or not Kori has been actively applying for new
13 employment, or whether he is using his alleged termination to intentionally shirk his
14 financial obligation to the parties' children. Regardless, Kori's refusal to obtain
15 gainful employment since his termination constitutes willful unemployment, and
16 income should be imputed to Kori consistent with his earning ability to ensure his
17 financial obligations to the children continue.

19 ¹ See Findings of Fact, Conclusions of Law, Decision and Orders entered on April 23, 2018, p. 20,
lines 4-8.

20 ² *Id.* at p. 18, lines 11-17; p. 20, lines 9-11.

³ See Order entered September 21, 2007.

1 In order to mitigate the lapse in health insurance for the minor children as a
2 result of Kori's unemployment, Malika has inquired about immediately obtaining
3 health insurance for them but was informed she is unable to enroll the children for
4 health insurance until January 1, 2020. In the interim, and so the children can
5 continue to play sports, Malika obtained temporary sports insurance for the children
6 in the amount of \$66.95 per child, per month, and Kori should be ordered to bear
7 one-half of this expense. In January 2020, when Malika is able to enroll the children
8 on her health insurance plan, Kori should also be required to share equally in the
9 premium thereon.

10 II.

11 OPPOSITION AND COUNTERMOTION

12 A. Kori's Demand to Modify Child Support Should Be Denied and His Child 13 Support Arrearages Should Be Reduced to Judgment Against Him.

14 NRS 125B.070 states, in pertinent part:

15 1. As used in this section and NRS 125B.080, unless the context
otherwise requires:

16 (a) "Gross monthly income" means the total amount of income
17 received each month from any source of a person who is not self-
18 employed or the gross income from any source of a self-employed
19 person, after deduction of all legitimate business expenses, but
without deduction for personal income taxes, contributions for
20 retirement benefits, contributions to a pension or for any other
personal expenses.

1 (b) "Obligation for support" means the sum certain dollar amount
2 determined according to the following schedule:

3 ...

(2) For two children, 25 percent;

4 ...

5 of a parent's gross monthly income, but not more than the presumptive
6 maximum amount per month per child set forth for the parent in
7 subsection 2 for an obligation for support determined pursuant to
8 subparagraphs (1) to (4), inclusive, unless the court sets forth findings
9 of fact as to the basis for a different amount pursuant to subsection 6
10 of NRS 125B.080.

11 Pursuant to NRS 125B.070, when a party is awarded primary physical custody
12 of two minor children, child support shall equal 25% of the non-custodial party's
13 gross monthly income, subject to the statutory presumptive maximum amounts.

14 Regarding willful underemployment, NRS 125B.080(8) states: "If a parent
15 who has an obligation for support is willfully underemployed or unemployed to
16 avoid an obligation for support of a child, that obligation must be based upon the
17 parent's true potential earning capacity."

18 Where evidence of willful underemployment preponderates, a presumption
19 will arise that such underemployment is for the purpose of avoiding support.
20 Minnear v. Minnear, 107 Nev. 495, 498, 814 P.2d 85, 86 (1991). Once this
presumption arises, the burden of proving willful underemployment for reasons
other than avoidance of a support obligation will shift to the supporting parent. Id.

1 at 498, 86–87 (citing People v. Sorensen, 68 Cal.2d 280, 66 Cal.Rptr. 7, 12, 437 P.2d
2 495, 500 (1968)).

3 Here, pursuant to the FFCLJ, Kori is currently required to pay child support
4 in the amount of \$815.61 per month based on his gross monthly income of
5 \$3,262.44, and maintain health insurance for the minor children. As shown above,
6 Kori has alleged he was terminated from his employer resulting in a significant
7 decrease in his income. Malika does not know whether Kori has been actively
8 engaged in seeking new employment, but believes Kori is using his alleged
9 termination to shirk his financial responsibility to the children. Thus, it appears
10 likely that Kori's unemployment is willful. Pursuant to Minnear, Kori now has the
11 burden of proving willful unemployment for reasons other than avoidance of a
12 support obligation to justify his request to reduce that obligation. Id., at 498, 86–87.
13 There is nothing is Kori's Motion that comes close to meeting that burden.

14 Further, NRS 125B.070 requires that child support be based upon the
15 obligor's income from all sources, and Kori has failed to establish that his reported
16 unemployment is his only source of income, as it is believed that Kori has
17 historically received additional government assistance.

18 Based on the above, Kori's demand that the Court reduce his child support
19 should be denied, and Kori's child support should continue to be based upon what
20 he is capable of earning in accordance with NRS 125B.080(8). Kori should also be

1 required to share equally in the children's interim sports insurance, in the amount of
2 \$66.95 per child, per month, until Malika is able to obtain health insurance for the
3 children in January 2020. Upon the children's enrollment in a health insurance plan,
4 Kori should be required to share equally in the cost of the children's health insurance
5 premium.

6 **B. Malika Should Be Awarded Her Attorney's Fees and Costs in the**
7 **Amount of \$2,500.00.**

8 NRS 18.010 states as follows:

9 In addition to the cases where an allowance is authorized by specific
10 statute, the court may make an allowance of attorney's fees to a
11 prevailing party:

12 (a) When he has not recovered more than \$ 20,000; or

13 (b) Without regard to the recovery sought, when the court finds that the
14 claim, counterclaim, cross-claim or third-party complaint or defense of
15 the opposing party was brought or maintained without reasonable
16 ground or to harass the prevailing party. The court shall liberally
17 construe the provisions of this paragraph in favor of awarding attorney's
18 fees in all appropriate situations. It is the intent of the Legislature that
19 the court award attorney's fees pursuant to this paragraph and impose
20 sanctions pursuant to Rule 11 of the Nevada Rules of Civil Procedure
in all appropriate situations to punish for and deter frivolous or
vexatious claims and defenses because such claims and defenses
overburden limited judicial resources, hinder the timely resolution of
meritorious claims and increase the costs of engaging in business and
providing professional services to the public.

Furthermore, EDCR 7.60(b) states as follows:

The court may, after notice and an opportunity to be heard, impose
upon an attorney or a party any and all sanctions which may, under the

1 facts of the case, be reasonable, including the imposition of fines, costs
2 or attorney's fees when an attorney or a party without just cause:

3 (1) Presents to the court a motion or an opposition to a motion
4 which is obviously frivolous, unnecessary or unwarranted.

5 (2) Fails to prepare for a presentation.

6 (3) So multiplies the proceedings in a case as to increase costs
7 unreasonably and vexatiously.

8 (4) Fails or refuses to comply with these rules.

9 (5) Fails or refuses to comply with any order of a judge of the
10 court.

11 First, undersigned counsel is A/V rated and a Certified Specialist in Nevada
12 Family Law. As to the "character and quality of the work performed," we ask the
13 Court to find our work in this matter to have been adequate, both factually and
14 legally; we have diligently reviewed the applicable law, explored the relevant facts,
15 and believe that we have properly applied one to the other. Finally, as to the result
16 reached, this remains to be determined when the Court rules on the present
17 Opposition and Countermotion.

18 As shown above, Kori has brought this action without reasonable grounds and
19 likely for the purpose of harassing Malika. Malika should not be forced to incur
20 additional and unnecessary attorney's fees and costs due to Kori's unreasonable
course of conduct. Accordingly, this Court should enter an award for Malika's

1 attorney's fees and costs in an amount not less than \$5,000.00, with same reduced
2 to judgment against Kori, collectible by any lawful means.

3 **IV.**

4 **CONCLUSION**

5 In light of the authority stated above, Mailka respectfully requests that the
6 Court grant the following relief:

- 7 1. Denying Kori's Motion in its entirety;
- 8 2. Ordering Kori to share equally in the cost of the children's health insurance
9 premium;
- 10 3. Awarding Malika her attorney's fees and costs in the amount of \$5,000.00;
11 and
- 12 4. For any and all other relief deemed appropriate by the Court in the
13 premises.

14 Dated this 26 day of November, 2019.

15 **GHANDI DEETER BLACKHAM**

16  #12800
17 Brian E. Blackham, Esq. for.
18 Nevada Bar No. 9974
19 725 S. 8th Street, Suite 100
20 Las Vegas, NV 89101
Attorneys for Malika Coppedge

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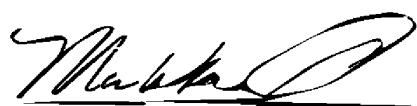
AFFIDAVIT OF MALIKA COPPEDGE

STATE OF NEVADA)
)ss.
COUNTY OF CLARK)

Malika Coppedge, being first duly sworn, deposes and says:

I am the Petitioner in this matter, am over the age of 18, and competent to testify herein. I have read the foregoing Opposition and Countermotion, and the factual allegations contained in the section entitled "Statement of Facts" 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 and as to all of those matters, I believe them to be true.

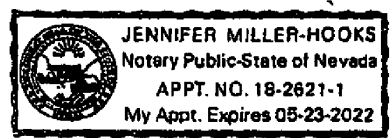
DATED this 24 day of November, 2019.


MALIKA COPPEDGE

SUBSCRIBED AND SWORN to before
me this _____ day of November, 2019.



Notary Public In and For
Said County and State



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26th day of November 2018, I served a copy of
MALIKA COPPEDGE'S OPPOSITION TO DISTRICT ATTORNEY'S NOTICE
OF MOTION & MOTION TO MODIFY CHILD SUPPORT AND
COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS upon each of the
parties and addressed to those counsel of record as follows:

- ☐ Electronic Service to:
- ☐ Via Facsimile to:
- ☐ Via Email to:
- ☒ Placing in the U.S. Mail, with postage fully prepaid, addressed to:

Steven B. Wolfson, DA	Kori Cage
Family Support Division	8655 Rowland Bluff Ave.
1900 E. Flamingo Road, Suite 100	Las Vegas, NV 89178
Las Vegas, NV 89119	Respondent

GHANDI DEETER BLACKHAM


An employee of Ghandi Deeter Blackham



NEMR
Steven B. Wolfson, District Attorney
Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TTY and/or other relay services: 711
437763100A

DISTRICT COURT
CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human Services,)
Div. Of Welfare & Supportive Services,)
(Malika Coppedge),)
Petitioner,)
vs.)
Kori L Cage,)
Respondent.)

Case no. R136990
Dept. no. CHILD SUPPORT

NOTICE OF ENTRY OF MASTER'S RECOMMENDATIONS

To: Kori L Cage, Respondent or Respondent's Attorney

To: Malika Coppedge, Petitioner or Petitioner's Attorney

Please take notice that the enclosed Master's Recommendations were entered in the above-entitled matter on December 13, 2019.

1 CERT

Case no. R136990

2 CERTIFICATE OF MAILING

3 The foregoing Notice of Entry of Master's Recommendations for the Master's
4 Recommendation entered on December 13, 2019, was served upon Malika Coppedge by mailing a copy
5 thereof, first class mail, postage prepaid to:

6 Malika Coppedge
7 5961 Tunbridge Ave
8 Las Vegas NV 89139

9 on December 13, 2019.

10
11 /s/T. Lipscombe_____
12 Employee, District Attorney's Office
13 Family Support Division
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**OPPC
GHANDI DEETER BLACKHAM**

Nedda Ghandi, Esq.
Nevada Bar No. 11137
Email: nedda@ghandilaw.com
Brian E. Blackham, Esq.
Nevada Bar No. 9974
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725 S. 8th Street, Suite 100
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Facsimile: (702) 979-2485
Attorneys for Malika Coppedge

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human
Services, Div. Of Welfare &
Supportive Services, and (Malika
Coppedge),

Petitioner,

vs.

Kori L. Cage,

Respondent.

Case No.: 06R136990

Dept. No.: CHILD SUPPORT

Date of Hearing: TBD

Time of Hearing: TBD

**PETITIONER'S RESPONSE TO KORI L. CAGE'S
OBJECTION AND APPEAL THE DECEMBER 13, 2019
MASTER'S RECOMMENDATIONS AND COUNTERMOTION
TO ADOPT MASTER'S RECOMMENDATIONS IN FULL,
AND FOR ATTORNEY'S FEES AND COSTS**

Petitioner, MALIKA COPPEDGE (Malika), by and through her attorneys,
Nedda Ghandi, Esq. and Brian E. Blackham, Esq., of GHANDI DEETER
BLACKHAM, hereby files this Response and Countermotion and requests the
relief stated herein.

This Response and Counter-motion is made and based upon the papers and pleadings on file herein, the Points and Authorities submitted herewith, and any argument, which may be adduced at the time of hearing.

DATED this 6th day of January 2020.

GHANDI DEETER-BLACKHAM

Brian E. Blackham, Esq.
Nevada Bar No. 9974
725 S. 8th Street, Suite 100
Las Vegas, Nevada 89101
Attorney for Petitioner

/ / /

///

///

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **STATEMENT OF FACTS**

4 1. Malika and Respondent Kori Cage (Kori) were never married.
5 However, there are two minor children the issue of their relationship, to wit: Kyree
6 Lovett Cage (Kyree), born December 3, 2004, and Jayla Nicole Cage (Jayla), born
7 February 20, 2007.

8 2. Pursuant to the Findings of Fact, Conclusions of Law, Decision and
9 Orders (FFCLJ), entered by the District Court in case no. D-07-374223-P on April
10 23, 2018, Malika was awarded primary physical custody of the minor children,
11 subject to Kori's right to specified visitation.

12 3. Based on the custodial timeshare, and Kori's reported income of
13 \$3,262.44 Malika was awarded child support in the amount of \$815.61. Kori was
14 ordered to maintain health insurance for the minor children, with the parties sharing
15 equally in the cost of unreimbursed medical expenses.

16 4. Since the entry of the FFCLJ, and although Malika has not seen any
17 supporting documentation, Kori requested that his child support obligation be
18 modified and/or suspended based on his termination in employment.

19 5. On December 13, 2019, a hearing was held regarding Kori's request
20 to modify and/or suspended his child support obligation. The hearing master issued

1 the following recommendations, which Malika asks that the Court affirm and adopt
2 as the Order of this Court:

- 3 a. Temporarily the Court will permit a \$65 per child per month
4 downward deviation for a total monthly support of \$323.00,
5 Effective December 1, 2019, until further order¹;
- 6 b. Until the Court is clear on the remitter issue or until further
7 order, the underlying amount remains unchanged, but any
8 permanent modification will be as of December 1, 2019;
- 9 c. The Court set no arrears at this time, pending the next Court
10 date;
- 11 d. This Order is temporary per stipulation of the parties pending
12 the next Court date;
- 13 e. The D case to be consulted for any new Orders regarding the
14 impact of the portion that was remanded;
- 15 f. The issues that have been raised in the Motion and
16 Countermotion are still ripe for determination; and
- 17 g. A hearing date was scheduled for March 13, 2020.

18 ///

19 ///

20 _____
¹ See Exhibit 1, Report and Recommendations.

1 II.

2 ARGUMENT

3 A. This Court Should Affirm and Adopt the Master's Recommendation for
4 Child Support.

5 EDCR 1.31 governs child support hearing masters, and states the following,
6 in pertinent part:

7 (a) The chief judge shall appoint a presiding judge to manage the
8 family division of the district court.

9 (b) The presiding judge is responsible for the following judicial duties:

10 ...

11 (5) Child Support Calendars:

12 (i) To refer all child support cases to hearing masters,
13 direct the appointment of said masters with the approval
14 of the family division judges, hear all objections to the
15 master's findings, unless another family division judge has
16 been assigned to the matter, and direct the enforcement
17 thereof as may be appropriate.

18 (ii) Meet with and supervise the activities of the child
19 support hearing masters in the performance of their duties
20 under Rule 1.40.

(iii) Review and sign off on recommendations of the child
support masters with respect to disposition of all child
support petitions unless the matter has been assigned to a
specific family division judge.

...

1 NRS 3.405 states the following, in pertinent part:

2 ...

3 2. The court may appoint a master to hear all cases in a county to
4 establish or enforce an obligation for the support of a child, or to modify
or adjust an order for the support of a child pursuant to NRS 125B.145.

5 3. The master must be an attorney licensed to practice in this State.
6 The master:

7 (a) Shall take testimony and establish a record;

8 (b) In complex cases shall issue temporary orders for support
pending resolution of the case;

9 (c) Shall make findings of fact, conclusions of law and
10 recommendations for the establishment and enforcement of an
order;

11 (d) May accept voluntary acknowledgments of paternity or
12 liability for support and stipulated agreements setting the amount
of support;

13 (e) May, subject to confirmation by the district court, enter
14 default orders against a responsible parent who does not respond
to a notice or service within the required time; and

15 (f) Has any other power or duty contained in the order of
16 reference issued by the court.

17 If a temporary order for support is issued pursuant to paragraph
18 (b), the master shall order that the support be paid to the Division
of Welfare and Supportive Services of the Department of Health
19 and Human Services, its designated representative or the district
attorney, if the Division of Welfare and Supportive Services or
20 district attorney is involved in the case, or otherwise to an
appropriate party to the action, pending resolution of the case.

1 4. The findings of fact, conclusions of law and recommendations of
2 the master must be furnished to each party or the party's attorney at the
3 conclusion of the proceeding or as soon thereafter as possible. Within
4 10 days after receipt of the findings of fact, conclusions of law and
5 recommendations, either party may file with the court and serve upon
6 the other party written objections to the report. **If no objection is filed,
7 the court shall accept the findings of fact, unless clearly erroneous,
8 and the judgment may be entered thereon. If an objection is filed
9 within the 10-day period, the court shall review the matter upon
10 notice and motion.**
11 (Emphasis supplied).

12 At the outset it must be noted, that as stated in the Master's Recommendation,
13 Kori's interim modified child support obligation was ordered pursuant to *the*
14 *stipulation of the parties* at the time of hearing in this matter given the underlying
15 dispute as to whether the court has jurisdiction to modify Kori's child support
16 obligation pending the Petition for Review, filed by Kori with the Nevada Supreme
17 Court, on December 9, 2019 in Case No. 76006. The purpose of the interim
18 modification—despite the concerns of the court, Malika, and the DA that the court
19 may not have jurisdiction to make any modifications the Petition for Review
20 remains pending—was to reduce Kori's exposure to a contempt finding due to his
alleged inability to satisfy his full child support obligation after becoming
unemployed. Kori's current Objection is entirely inconsistent with the stipulation
placed on the record at the December 13 hearing, which did not address the
substantive issues and benefitted no one but Kori. In fact, the Master's
Recommendation relieves Kori of the obligation to make payments on his accrued

1 arrearages pending the return hearing in this matter, and affirms that any permanent
2 modification shall apply from December 1, 2019, forward.² As such, Kori's
3 contention that collection of arrears should be stayed is moot, as the court has
4 already stayed collection of arrearages.

5 For these reasons, the Master's Recommendation should be affirmed.

6 **B. Malika Should Be Awarded Her Attorney's Fees and Costs In the**
7 **Amount of \$3,000.00 for Being Forced to Respond to Kori's Objection.**

8 NRS 18.010 provides, in pertinent part, as follows:

9 1. The compensation of an attorney and counselor for his or her
10 services is governed by agreement, express or implied, which is
11 not restrained by law.

12 2. In addition to the cases where an allowance is authorized by
13 specific statute, the court may make an allowance of attorney's
14 fees to a prevailing party:

15 (a) When the prevailing party has not recovered more
16 than \$20,000; or

17 (b) Without regard to the recovery sought, when the court
18 finds that the claim, counterclaim, cross-claim or third-
19 party complaint or defense of the opposing party was
20 brought or maintained without reasonable ground or to
harass the prevailing party. The court shall liberally
construe the provisions of this paragraph in favor of
awarding attorney's fees in all appropriate situations. It is
the intent of the Legislature that the court award attorney's
fees pursuant to this paragraph and impose sanctions
pursuant to Rule 11 of the Nevada Rules of Civil
Procedure in all appropriate situations to punish for and
deter frivolous or vexatious claims and defenses because

² See Exhibit 1.

1 such claims and defenses overburden limited judicial
2 resources, hinder the timely resolution of meritorious
3 claims and increase the costs of engaging in business and
4 providing professional services to the public.

5 Furthermore, EDCR 7.60(b) states:

6 ...

7 (b) The court may, after notice and an opportunity to be heard,
8 impose upon an attorney or a party any and all sanctions which
9 may, under the facts of the case, be reasonable, including the
10 imposition of fines, costs or attorney's fees when an attorney or
11 a party without just cause:

12 (1) Presents to the court a motion or an opposition to a
13 motion which is obviously frivolous, unnecessary or
14 unwarranted.

15 (2) Fails to prepare for a presentation.

16 (3) So multiplies the proceedings in a case as to increase
17 costs unreasonably and vexatiously.

18 (4) Fails or refuses to comply with these rules.

19 (5) Fails or refuses to comply with any order of a judge of
20 the court.

The Nevada Supreme Court has also held that attorney's fee awards to pro
bono counsel are proper. Miller v. Wilfong, 121 Nev. 619, 119 Nev. P.3d 727, 730
(2005). However, the party requesting fees must (1) provide the basis for the fee
request; and (2) evaluate the factors set forth in Brunzell v. Golden Gate National
Bank, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969). These factors are:

1 1. *The Qualities of the Advocate*: his ability, his training,
2 education, experience, professional standing and skill.

3 2. *The Character of the Work to Be Done*: its difficulty, its
4 intricacy, its importance, time and skill required, the
5 responsibility imposed and the prominence and character of the
6 parties where they affect the importance of the litigation.

7 3. *The Work Actually Performed by the Lawyer*: the skill, time
8 and attention given to the work.

9 4. *The Result*: whether the attorney was successful and what
10 benefits were derived.

11 Each of these factors should be given consideration, and no one element
12 should predominate or be given undue weight. Miller v. Wilfong, 121 Nev. 619,
13 119 P.3d 727, 730 (2005). Additional guidance is provided by reviewing the
14 “attorney’s fees” cases most often cited in Family Law. Fletcher v. Fletcher, 89
15 Nev. 540, 516 P.2d 103 (1973); Levy v. Levy, 96 Nev. 902, 620 P.2d 860 (1980),
16 Hybarger v. Hybarger, 103 Nev. 255, 737 P.2d 889 (1987). The Brunzell factors
17 require counsel to make a representation as to the “qualities of the advocate,” the
18 character and difficulty of the work performed, and the work actually performed by
19 the attorney.

20 First, respectfully, we suggest that undersigned counsel is A/V rated and a
21 Certified Specialist in Nevada family law and has practiced primarily in the area of
22 family law for over 12 years. As to the “character and quality of the work
23 performed,” we ask the Court to find our work in this matter to have been adequate,

1 both factually and legally; we have diligently reviewed the applicable law, explored
2 the relevant facts, and believe that we have properly applied one to the other.
3 Finally, as to the result reached, this remains to be determined when the Court rules
4 on the present Response and Countermotion.

5 As shown above, Kori has brought this Motion in bad faith, failing to apply
6 the applicable legal standard or proffer any facts that would justify his baseless
7 demand that the recommendations of the Hearing Master be ignored by the Court.

8 Accordingly, this Court should enter an award for Malika's attorney's fees
9 and costs in an amount not less than \$3,000.00 and reduce the same to judgment
10 against Kori and in favor of Malika, collectible by any lawful means.

11 **III.**

12 **CONCLUSION**

13 In light of the authority and facts as stated above, Malika respectfully
14 requests an Order granting the following relief:

- 15 1. Denying Kori's Motion in its entirety;
16 2. Affirming and adopting the Master's Recommendations;

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3. Awarding Malika her attorneys' fees in the amount of \$3,000 for being forced to file the instant Response and Countermotion; and
4. For such other and further relief as this Court deems just and proper.
- DATED this 6th day of January 2020.

Respectfully Submitted,
GHANDI DEETER BLACKHAM


Brian E. Blackham, Esq.
Nevada Bar No. 9974
725 S. 8th Street, Suite 100
Las Vegas, Nevada 89101
Attorney for Petitioner

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of January 2020, I served a copy of the foregoing PETITIONER'S OPPOSITION TO KORI L. CAGE'S OBJECTION AND APPEAL THE DECEMBER 13, 2019 MASTERS RECOMMENDATIONS AND COUNTERMOTION TO ADOPT MASTER'S RECOMMENDATIONS IN FULL, AND FOR ATTORNEY'S FEES AND COSTS upon each of the parties and addressed to those counsel of record:

- ☐ Electronic Service to:
- ☐ Via Facsimile to:
- ☐ Via Email to:
- ☒ Placing in the U.S. Mail, with postage fully prepaid, addressed to:

Steven B. Wolfson, DA	Kori Cage
Family Support Division	8655 Rowland Bluff Ave.
1900 E. Flamingo Road, Suite 100	Las Vegas, NV 89178
Las Vegas, NV 89119	Respondent

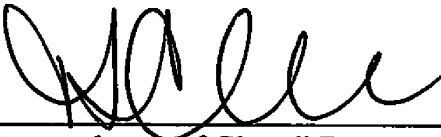

An employee of Ghandi Deeter Blackham

EXHIBIT 1

1 MRAO
2 STEVEN B. WOLFSON
3 DISTRICT ATTORNEY
4 Nevada Bar No. 001565
5 FAMILY SUPPORT DIVISION
6 1900 East Flamingo Road, Suite 100
7 Las Vegas, Nevada 89119-5168
8 (702) 671-9209
9 TTY and/or other relay services: 711
437763100A

District Court
CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human Services, Div. Of)
Welfare & Supportive Services, and (Malika Coppedge),)
Petitioner,)
vs.)
Kori L Cage,)
Respondent.)

Case No. R136990

Department No. CHILD SUPPORT

MASTER'S RECOMMENDATION

This matter having been heard on DECEMBER 13, 2019 before the undersigned Hearing Master, having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).
Respondent's gross monthly income (GMI) : ; formula amount % of GMI=

Basis for deviation from state formula: R has 2 other minor children.
Respondent is to pay current support for the child(ren), Kyree Cage, Jayla Nicole Cage.

CHILD SUPPORT

Respondent is to pay monthly:

\$323.00 Temp child support
medical support (in lieu of health insurance)
spousal support
arrear payment

☐ ARREARAGES ☒ ARREARAGES NOT ADDRESSED AT THIS HEARING

\$ 323.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

Respondent's INCOME SHALL BE WITHHELD for the payment of support.

☐ Good cause to stay income withholding is based on: _____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.

☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

☐ Respondent is referred to Employment Services for an appointment on _____ at _____ AM.

☒ Health insurance coverage for the minor child(ren) herein:

☒ Respondent to provide: ☐ Petitioner to provide: ☐ Both Parties to provide:

☐ if available through employer. ☒ shall provide per court order.

FINING 1.3

☐ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING
☐ MODIFICATION OF PRIOR ORDER:

☐ SUSPENSION OF LICENSES:

PAYMENTS

All mailed payments MUST be made in the form of a cashier's check, money order or business check ONLY, made payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are also accepted.

Payments can be mailed to:

State Collection and Disbursement Unit (SCaDU)
 P.O. Box 98950
 Las Vegas, Nevada 89193-8950

Payments can be made in person at:

State Collection and Disbursement Unit (SCaDU)
 1900 East Flamingo Road
 Las Vegas, Nevada 89119-5168

Additionally, the following information must be included with each payment: name (first, middle, last) of person responsible for paying child support, social security number of person responsible for paying child support, child support case number, and name of petitioner (first and last name of person receiving child support).

NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.

NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.

NOTICE: Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095. If the Respondent pays support through income withholding and the full obligation is not met by the amount withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be subject to assessment of penalties and interest. The Respondent may avoid these additional costs by making current support payments each month. If another state takes jurisdiction and obtains a new order, Nevada interest and penalties will only be calculated to the date of the new order and will be enforced.

NOTICE: Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

NOTICE: Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final Order/Judgment being ordered by District Court. However, the Master's Recommendation is not an Order/Judgment unless signed and filed by a Judge.

NOTICE: Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written Notice of Entry of Judgment.

1 NOTICE: Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address, change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10) days of such change.

3 Respondent to bring new financial statement and proof of income next date.

4 This order does not stay collection of support arrears by execution or any other means allowed by law.

5 MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

6 Counsel for P is present, Mr. Blackham, Esq., and he is retained. Last payment-9/2019.

7 This matter in the D case of the parties was on appeal. There was an appellate decision made on 11-15-19; however, the remitter had not been received. Counsel represented that R had filed a request for rehearing/reconsideration. Court and Counsel are of the opinion that there is no jurisdiction at this time for the court to hear any issues in this matter.

8 Based upon the remitter issue, DA and Mr. Blackham agree, and R argues that he needs at least a temporary reprieve from the current support to avoid contempt. R is getting \$418/wk in UIB, which is \$1811 gmi. 25% is \$453/mo. Temporarily the court will permit a \$65 per child per month downward deviation for a total monthly support of \$323.00. effective December 1, 2019 until further order. This is to avoid contempt only. Until the court is clear on the remitter issue or until further order the underlying amount remains unchanged but any permanent modification will be as of 12-1-19. The court will set no arrears at this time pending the next court date.

12 R Medicaid for the children as of 12-13-19, court is uncertain if this is correct as it would appear from the appellate order that P is the PPC, but once again there is a remitter issue.

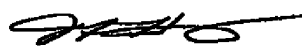
13 P is providing sports insurance for the children at the rate of \$66.95/mo. DA represents that it appears that R has continuously provided the health insurance for the children as it was ordered.

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16 At the next court date, the court and/or attorneys to research the remitter jurisdiction issue if the case is still at the appellate court. The D case to be consulted for any new orders regarding the impact of the portion that was remanded. The issues that have been raised in the motion and countermotion are all still ripe for determination. R and P to bring current pay information (stubs/2018 and 2019 tax returns and supporting documents) to the next court date.

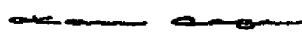
18 NEXT HEARING DATE IS March 13, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

21 DATED: DECEMBER 13, 2019


MASTER

23 USJR DISPOSITIONS

- 24** ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
25 ☐ - Involuntary (Statutory) Dismissal
☐ - Dismissed / Want of Prosecution
☐ - Transferred to Another Jurisdiction
26 ☐ - Other Manner of Dispo
☐ - Close Case


Respondent/Respondent's Attorney
Receipt of this document is
acknowledged by my signature.

ORDER/JUDGMENT

☐ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844. The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an ORDER/JUDGMENT of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. The parties are ordered to comply with this Order/Judgment.

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ IT IS HEREBY ORDERED that the Master's Recommendation IS affirmed and adopted as an ORDER/JUDGMENT of the District Court this _____ day of _____, 20____.

☐ IT IS HEREBY ORDERED that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20____ and this matter is remanded to Child Support Court on _____, 20____ at _____ M.

District Court Judge, Family Division

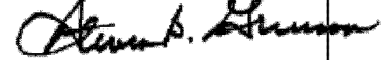
STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

By: Karen Cliffe

DEPUTY DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168

MRAO
STEVEN B. WOLFSON
DISTRICT ATTORNEY
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Las Vegas, Nevada 89119-5168
(702) 671-9200
TTY and/or other relay services: 711
437763100A

Electronically Filed
1/7/2020 11:13 AM
Steven D. Grierson
CLERK OF THE COURT



District Court

CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human Services, Div. Of)
Welfare & Supportive Services, and (Malika Coppedge),)
Petitioner,)
vs.)
Kori L Cage,)
Respondent.)

Case No. R136990

Department No. CHILD SUPPORT

MASTER'S RECOMMENDATION

This matter having been heard on DECEMBER 13, 2019 before the undersigned Hearing Master, having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

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☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

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☐ if available through employer. ☒ shall provide per court order.

☐ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

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☐ MODIFICATION OF PRIOR ORDER:

☐ SUSPENSION OF LICENSES:

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Based upon the remitter issue, DA and Mr. Blackham agree, and R argues that he needs at least a temporary reprieve from the current support to avoid contempt. R is getting \$418/wk in UIB, which is \$1811 gmi. 25% is \$453/mo. Temporarily the court will permit a \$65 per child per month downward deviation for a total monthly support of \$323.00. effective December 1, 2019 until further order. This is to avoid contempt only. Until the court is clear on the remitter issue or until further order the underlying amount remains unchanged but any permanent modification will be as of 12-1-19. The court will set no arrears at this time pending the next court date.

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NEXT HEARING DATE IS March 13, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: DECEMBER 13, 2019



MASTER

USJR DISPOSITIONS

- ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
☐ - Involuntary (Statutory) Dismissal
☐ - Dismissed / Want of Prosecution
☐ - Transferred to Another Jurisdiction
☐ - Other Manner of Dispo
☐ - Close Case



**Respondent/Respondent's Attorney
 Receipt of this document is
 acknowledged by my signature.**

ORDER/JUDGMENT

☒ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this _____ day of _____, 20_____.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20_____ and this matter is remanded to Child Support Court on _____, 20_____ at _____, M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

By: *Karen Cliffe*

DEPUTY DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168



NEMR
Steven B. Wolfson, District Attorney
Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TTY and/or other relay services: 711
437763100A

DISTRICT COURT
CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human Services,)
Div. Of Welfare & Supportive Services,)
(Malika Coppedge),)
Petitioner,)
vs.)
Kori L Cage,)
Respondent.)

Case no. 06R136990
Dept. no. CHILD SUPPORT

NOTICE OF ENTRY OF MASTER'S RECOMMENDATIONS

To: Kori L Cage, Respondent or Respondent's Attorney

To: Malika Coppedge, Petitioner or Petitioner's Attorney

Please take notice that the enclosed Master's Recommendations were entered in the above-entitled matter on March 13, 2020.

1 CERT

Case no. 06R136990

2 CERTIFICATE OF MAILING

3 The foregoing Notice of Entry of Master's Recommendations for the Master's
4 Recommendation entered on March 13, 2020, was served upon Malika Coppedge by mailing a copy
5 thereof, first class mail, postage prepaid to:

6 Malika Coppedge
7 5961 Tunbridge Ave
8 Las Vegas NV 89139

9 on March 17, 2020.

10
11 /s/T. Lipscombe
12 Employee, District Attorney's Office
13 Family Support Division
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1 MRAO
2 STEVEN B. WOLFSON
3 DISTRICT ATTORNEY
4 Nevada Bar No. 001565
5 FAMILY SUPPORT DIVISION
6 1900 East Flamingo Road, Suite 100
7 Las Vegas, Nevada 89119-5168
8 (702) 671-9200
9 TTY and/or other relay services: 711
10 437763100A

District Court
CLARK COUNTY, NEVADA

11 NEVADA DEPT OF HEALTH & HUMAN)
12 SERVICES, DIV. OF WELFARE & SUPPORTIVE)
13 SERVICES, AND (MALIKA COPPEDGE),)
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Petitioner,)

vs.)

KORI L CAGE,)

Respondent.)

Case No. 06R136990

Department No. CHILD SUPPORT

MASTER'S RECOMMENDATION

This matter having been heard on **MARCH 13, 2020 (Attorney Blakesley, #12802)** before the undersigned Hearing Master, having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

Basis for deviation from state formula: 2 Additional children: Kamryn and Londyn.

Respondent is to pay current support for the child(ren), Kyree Cage, AND Jayla Nicole Cage.

CHILD SUPPORT

Respondent is to pay monthly:

\$323.00 Temp child support

medical support

spousal support

\$0.00 Temp arrears payment

☒ ARREARAGES ☐ ARREARAGES NOT ADDRESSED IN THIS ORDER

Arrears/Obligation period is 06/01/17 through 01/31/20.

Arrears, interest and penalty calculated through 1/31/20 by audit. For accounting purposes, the next payment is due 2/01/2020.

child support arrearage of \$1,574.48 plus interest of \$728.38 penalty of \$426.32

medical support arrearage of plus interest of penalty of

spousal support arrearage of plus interest of

medical expense arrearage of

genetic test costs of

total arrearages of \$1,574.48 total interest \$ 728.38 total penalty \$ 426.32

GRAND TOTAL (arrearages + interest + penalty) = **\$2,729.18**

☐ The total arrears are hereby confirmed.

☒ The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040.

☐ Arrears of \$_____ subject to modification until _____, and arrears of \$_____ reduced to judgment.

☐ Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.

☐

\$ 323.00

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Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

☐ Good cause to stay income withholding is based on:_____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.

☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

☒ Health insurance coverage for the minor child(ren) herein:

☒ Respondent to provide: ☐ Petitioner to provide: ☐ Both Parties to provide:

☐ if available through employer. ☒ shall provide per court order.

☒ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING

☒ MODIFICATION OF PRIOR ORDER:

☒ Modification effective: 12/01/19.

☒ This order modifies a previously existing, previously controlling support order. By this modification, this tribunal assumes or retains continuing, exclusive jurisdiction of the child support obligation for the child(ren) and parties identified in this order. Modification is proper for the following reason(s):

☒ The previously controlling order is from Clark County, Nevada, dated April 23, 2018, #D-07-374223-P.

☒ An individual party, Kori L.Cage, has requested modification of the previously controlling Nevada support order.

☐ An individual party, _____, has requested modification; this tribunal has personal jurisdiction over the non-movant and the issuing state (the state whose order controlled prior to this modification) is no longer the residence of any individual party/contestant or child(ren).

☐ An individual party, _____, has requested modification; all individual parties and children now reside in Nevada.

☐ All parties have filed written consent with the tribunal whose order controlled prior to this modification for this tribunal to modify the support obligation and assume continuing, exclusive jurisdiction.

☐ SUSPENSION OF LICENSES:

PAYMENTS

1 All mailed payments **MUST** be made in the form of a cashier's check, money order or business check **ONLY**, made
 2 payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are
 also accepted. Fees may apply.

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8 Additionally, the following information must be included with each payment: name (first, middle, last) of person
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10 **NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.**

11 **NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.**

12 **NOTICE:** Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant
 13 to NRS 99.040. If the Respondent pays support through income withholding and the full obligation is not met by the amount
 withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the
 14 amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be
 subject to assessment of interest. The Respondent may avoid these additional costs by making current support payments each
 15 month. If another state takes jurisdiction and obtains a new order, Nevada interest will only be calculated to the date of the
 new order and will be enforced.

16 **NOTICE:** Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and
 Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the
 17 support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this
 purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

18 **NOTICE:** Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's
 19 Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final
 Order/Judgment being ordered by District Court.

20 **NOTICE:** Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written
 Notice of Entry of Judgment.

21 **NOTICE:** Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address,
 22 change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10)
 days of such change.

23 **NOTICE:** If you want to adjust the amount of child support established in this order, you **MUST** file a motion to modify the
 24 order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the
 child support obligation established in this order will continue until such time as all children who are the subject of this order
 25 reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18
 years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties
 26 agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the
 date the motion was filed.

27 Respondent to bring new financial statement and proof of income next date.

28 This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

Last payment 3/02/20 UIB. Respondent's Unemployment Insurance Benefits may end 9/2020. Respondent testified he is diligently looking for work. He is to provide copies of Medicaid cards he has for childrent to DAFS caseworker within 30 days to then be forwarded to Petitioner. Respondent's request to retroactively modify support beyond the filing date of the motion is hereby DENIED. NRS.125B.3828 Petitioner's request for attorney fees is hereby DENIED. Respondent had a legal to file a motion to reduce. Respondent's request for further consideration of a reduction in support, such as this court consider the income of Petitioner, is DENIED. Respondent's request to reduce support has been GRANTED. Petitioner has sporadic income per her attorney.

NEXT HEARING DATE IS September 25, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: MARCH 13, 2020



MASTER

USJR DISPOSITIONS

- ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
☐ - Involuntary (Statutory) Dismissal
☐ - Dismissed / Want of Prosecution
☐ - Transferred to Another Jurisdiction
☐ - Other Manner of Dispo
☐ - Close Case

Respondent/Respondent's Attorney
Receipt of this document is
acknowledged by my signature.

ORDER/JUDGMENT

☐ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this _____ day of _____, 20____.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20____ and this matter is remanded to Child Support Court on _____, 20____ at _____ M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

1 By: *V. Monet Arde*
2 DEPUTY DISTRICT ATTORNEY
3 FAMILY SUPPORT DIVISION
4 1900 East Flamingo Road, Suite 100
5 Las Vegas, Nevada 89119-5168
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Alvin B. Ginn
CLERK OF THE COURT

1 **OBJ/APP**

2 **KORI CAGE**

3 8655 Rowland Bluff Ave

4 Las Vegas, Nevada 89178

5 Phone: (702) 771-2506

6 kcage01@gmail.com

7 **Plaintiff in Proper Person**

8 **DISTRICT COURT CLARK COUNTY, NEVADA**

9 Nevada Dept. of Health & Human Services,
10 Div. Of Welfare & Supportive Services, and
11 (MALIKA COPPEDGE)

12 **Petitioner,**

13 **vs.**

14 **KORI CAGE**

15 **Respondent.**

Case No. R136990

Dept. No. Child Support

Oral Argument Requested

No

16
17 **RESPONDENTS OBJECTION AND APPEAL OF THE MARCH 13, 2020**

18 **MASTERS RECOMMENDATIONS**

19
20 Date of Hearing: MARCH 13, 2019

21 Time of Hearing: 09:00 AM

22 Court Room: 1

23 In accordance to EDRC 1.40(e) and (f), Respondent brings forth this Objection/
24 Appeal from the March 13, 2019 Masters Recommendations.
25

1 **POINTS AND AUTHORITIES IN SUPPORT OF THE MOTION**

2
3 **BACKGROUND I**

4
5 This case is the result from the Petitioners intentional shirk of her financial
6 obligation to avoid paying her court order child support which was strategically
7 proceeded by her unsupported motion to modify her child support obligation
8 (November 17, 2016), followed by her motion for temporary primary custody
9 (May 17, 2017), then permanent primary custody (January 26, 2018). The change
10 in custody has resulted in the Respondent having to now pay child support through
11 an unlawful order written by the Petitioners retained attorney and adopted
12 wholesale by Judge Rena Hughes.

13 On September 10, 2019 Respondent was terminated from his employment
14 through no fault of his own, which is the reason for the current child support
15 modification. Respondent petitioned the District attorneys office to modify his
16 child support obligation September 12, 2019.

17 **Legal Argument II**

18 **Issues 1.**

- 19 a) Did the district court abuse its discretion by ignoring NRS 125.080(9) in
20 particular (L) the relative income of both parties when determining Respondents
21 temporary child support obligation?
- 22 b) Did the district court abuse its discretion by ignoring the new child support
23 regulations (22% for 2 children) codified in Chapter 425 of the Nevada
24 Administrative Code?
- 25 c) Did the district court abuse its discretion by its a non-complex temporary
order ignoring NRS 125B.145 and setting a new hearing date for 9/25/2020?

1 d) Did the district court abuse its discretion with its sua sponte order reducing
2 child support arrears to judgment ignoring NRS 425.470?

3 e) Did the district court abuse its discretion by setting the modification date to
4 12/1/2019 with no good cause findings on record rather than the date petitioned
5 9/12/2019 in accordance to 42 U.S.C. Sec. 666(a)(9)(c)?

6 f) Did the district court abuse its discretion by denying Respondents request
7 for Petitioner to show cause in accordance to NRS Rule 11(b)(1)?

8 Appeal 2.

9 a) NRS 125.080(9) states: "The court **shall** consider the following factors when
10 adjusting the amount of support of a child upon specific findings of fact (L) The
11 relative income of both parents." Chambers v. Sanderson, 107 Nev. 846. The
12 Supreme Court held, "Among the factors which the district court **must** consider,
13 when adjusting the amount of support of a child upon specific findings of fact is
14 the relative income of both parents. NRS 125B.080(9)(1). Thus, in denying Tara's
15 discovery and a hearing on the basis on which it did, the district court erred." See
16 also Barbagallo, 105 Nev. at 552, 779 P.2d at 536-37 as it relates to [1] Earning
17 capacity and relative financial means and [2] Standard of living.

18 Additionally, the December 13, 2019 hearing master, recommended parties
19 provide 2018 & 2019 tax returns at the March 13, 2020 hearing. However, the
20 March 13, 2020 hearing master vehemently declined to accept the December 13,
21 2019 hearing master's recommendations failing to accept the tax returns as well as
22 Defendants financial affidavit. Exhibit 1¹ Exhibit 2²

23 b) Effective February 1, 2020 new regulations codified in Chapter 425 of the
24 Nevada Administrative Code replace existing rules and establish child support

25 ¹ 12/13/2019 Hearing Masters recommendations

² Petitioners multiple businesses and Assets. Excluding her child support business from
Respondent and presumably her oldest son's father.

1 guidelines which will apply to previous cases *only if* the case qualifies for
2 modification or adjustment. In Relevant part: *For two (2) children*, the sum of: (a)
3 Twenty-two percent (22%) of the first \$6,000 of the obligor's monthly gross
4 income. Current, Respondent is unaware of any governing authority as this
5 regulation took effect less than 2 months ago, however the Hearing Master
6 acknowledge this new regulation on record during the March 13, 2020 hearing, yet
7 did not apply this calculation to the adjusted child support amount. See calculations
8 in Exhibit 1

9 c) NRS 125B.145 states in relevant part: 3(a) "Each person who is subject to an
10 order for the support of a child is notified, not less than once every 3 years" (4)
11 "support of a child may be reviewed at any time on the basis of changed
12 circumstances...a change of 20 percent or more in the gross monthly
13 income...deemed to constitute changed circumstances requiring a review for
14 modification of the order for the support of a child." Held in Fernandez v.
15 Fernandez, 126 Nev. Adv. Op. No. 3, 51423 (2010). Additionally, this is the
16 second temporary child support hearing within in 3 months, all considerations were
17 set to be considered during this March 13, 2020 hearing. The hearing master
18 certainly had access to finances, insurance and any other information deemed
19 appropriate and based her decisions accordingly. Further, there is no ethical or
20 legal need to temporarily set and continue with more hearings other than to strain
21 the judicial economy, harass the Respondent and increase litigation costs which is
22 not in the best interest of the children and is ONLY beneficial to opposing counsel
23 who at the time of the January 26, 2019 hearing had collected 30 thousand dollars.

24 d) Rather than adhering to NRS 425.470 Collection of arrearages in payments
25 of support; notice to responsible parent; request for hearing; good faith effort to
resolve matter required before hearing, The hearing master reduced Respondents
child support obligation to judgment *sua sponte*, adding interest and penalties

1 which violated Respondents due process rights Gordon v. Geiger, 133 Nev. Adv.
2 Op. 69 (Sept. 27, 2017). Additionally, as testified by the District Attorney,
3 Respondents current child support arrears is "0", however arrears was still
4 curiously reduced to judgement. Further, as codified in Chapter 425 of the Nevada
5 Administrative Code, child support interest and penalties are eliminated as of
6 February 1, 2020.

7 e) Rather than adhering to 42 U.S.C. Sec. 666(a)(9)(c) which states that child
8 support is "not subject to retroactive modification by such State or by any other
9 State; except that such procedures may permit modification with respect to any
10 period during which there is **pending a petition for modification, but only from**
11 **the date that notice of such petition has been given, either directly or through**
12 **the appropriate agent, to the obligee or to the obligor.**" Curiously, the Hearing
13 Master set the modification date as of 12/1/2019 rather than 9/12/2019 which is the
14 date the Respondent petitioned for modification directly through the appropriate
15 agent. Exhibit 3

16 f) In respect to NRS Rule 11(b)(1) and (3) The petitioner acknowledged that
17 The Respondent receives unemployment benefits (see opposition pg. 4 line 6-8)
18 stating: "Kori now alleges that he was terminated from his employment, and is
19 only earning approximately \$1,811.33 per month in unemployment benefits" The
20 question is how did the Petitioner know the Respondent was a) allegedly
21 terminated and b) allegedly receives unemployment benefits; as those allegations
22 where nowhere listed in the District Attorneys Notice of Motion. Presumably,
23 opposing counsel did his due diligence and corresponded with the District
24 Attorney's office Family Support Division to obtain this information.

25 Is the Petitioner now suggesting the District Attorney's office is being
untruthful regarding the Respondents income source or suggesting that the District
Attorney did not due its due diligence before bringing forth its motion on the

1 Respondents behalf? Surely opposing counsel knew or should have known that the
2 Respondent was in fact receiving unemployment benefits and that the Respondent
3 was not willfully unemployed as the widely known eligibility requirements for
4 receiving unemployment benefits are listed throughout the unemployment website
5 and in the unemployment handbook, which include but are not limited to:

6 a) You must be unemployed through no fault of your own, as defined by
7 Nevada Law.

8 b) You must be able and available to work, and you must be actively seeking
9 employment.

10 Yet the frivolous opposition and counterclaim was still advocated. The
11 above scheme is a clear violation of NRS Rule 11(b). See also the frivolous March
12 17, 2019 hearing³. Additionally the Respondent questions the basis and integrity
13 for asking for \$5000 in attorney fees for a 10 page motion as there was no basis in
14 law to do so that was not frivolous. Respondent asserts that the opposition and
15 countermotion was pursued frivolously in order to needlessly increase litigation
16 costs then attempt to transfer the Petitioners financial obligations to harass the
17 Respondent by arrogantly and vexatiously requesting attorney fees.

18 Further, the petitioner was late in filing her opposition and counter motion.
19 EDCR Rule 5.502 (d) opposition, counter motion states: "Within 10 days after
20 service of the motion, the opposing party **must** serve and file a written opposition
21 thereto, together with a memorandum of points and authorities and supporting
22 affidavits, if any, stating facts showing why the motion should be denied. Failure
23 of the opposing party to serve and file a written opposition may be construed as an
24 admission that the motion is meritorious and a consent to granting the same."

25 ³ case no. D07374223

1
2
3 **Judicial Responsibilities 3.**

4 In accordance to NRS Rule 11(c)(3) "On its own, the court may order an
5 attorney, law firm, or party to show cause why conduct specifically described in
6 the order has not violated Rule 11(b)."

7 Canon Rule 2.15. Responding to Judicial and Lawyer Misconduct.

8 (B) A judge having knowledge that a lawyer has committed a violation of the
9 Nevada Rules of Professional Conduct that raises a substantial question regarding
10 the lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects shall
11 inform the appropriate authority.

12 (D) A judge who receives information indicating a substantial likelihood that a
13 lawyer has committed a violation of the Nevada Rules of Professional Conduct
14 shall take appropriate action.

15 Rule 2.2. Impartiality and Fairness. A judge shall uphold and apply the law,
16 and shall perform all duties of judicial office fairly and impartially.

17 Rule 1.1. Compliance With the Law. A judge shall comply with the law,
18 including the Code of Judicial Conduct.

19 **Objections 4.**

20 Respondents objects (*More prejudicial than probative*) to the ORDER of
21 being the sole provider of health insurance as NRS 125B.020(1) states it is the
22 obligation of parents (plural) to provide health insurance, while the US constitution
23 and Article 1, § 1 and Article IV, § 21 of the Nevada Constitution forces a state to
24 govern impartially under Equal protection and not draw distinctions between
25 individuals solely on differences that are irrelevant to a legitimate governmental

1 objective. Thus, the equal protection clause is crucial to the protection of civil
2 rights. Bolling v. Sharpe, 347 U.S. 497 (1954).

3 Additionally, The Fourteenth Amendment of the United States Constitution
4 permits the States a wide scope of discretion in enacting laws which affect some
5 groups of citizens differently than others. McGowan v. Maryland, 366 U.S. *1025
6 420, 81 S. Ct. 1101, 6 L. Ed. 2d 393 (1961). If any state of facts may reasonably be
7 conceived to justify it, a statutory discrimination will not be set aside. In this case,
8 NO facts were suggested, implied or stated to warrant the unequal application of
the law.

9 Respondent objects to the district courts finding that the Petitioner has
sporadic income per her attorney as it [1] Assumes facts not in evidence [2]
10 violates the Best evidence Rule [3] Counsel is testifying

11 Respondent objects to the district courts recommendation that Respondent
12 provide Medicaid cards to DAFS caseworker within 30 days to then be forwarded
13 to the Petitioner due to [1] Hipaa regulations [2] Petitioners oral argument
14 regarding Medicaid cards was not in her motion, [3] Respondent expressed
15 confidentiality concerns in providing medical cards to the petitioner advising the
16 hearing master that he would/could provide the medical cards directly to the Dr.
17 Office as the Respondent would [4] like be abreast of all Dr. Visits and medical
18 treatment [5] wants to protect himself and younger children from a different
19 relationship who all share the same medical number, considering that the Petitioner
20 is an Advanced Registered Nurse who independently accepts Medicaid payments
and has access to medical records and a clear vendetta against Respondent and his
children.

1 DATED this 23 day of March, 2020

2 Pursuant to NRS 53.045, I declare under penalty of
3 perjury that the foregoing is true and correct.

4 Kori Cage (signature)

5 KORI CAGE

8655 Rowland Bluff Ave

Las Vegas, NV 89178

Phone: (702) 771-2506

kcage01@gmail.com

Appellant, Pro se

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 23 day of March, 2020, I placed a true and correct copy of the foregoing "RESPONDENTS OBJECTION AND APPEAL OF THE MARCH 13, 2020 MASTERS RECOMMENDATIONS" in the United States Mail, with first-class postage prepaid and/or via email or electronic facsimile transmission pursuant to EDCR 7.26 addressed to the following:

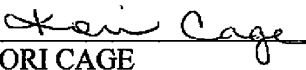
Clerk's Office Filing Dept.
601 N Pecos Road
Las Vegas, 89101

Steven B. Wolfson, DA
Family Support Division
1900 E. Flamingo Road, Suite 100
Las Vegas, Nevada 89119

Brian E. Blackham / Leah M. Blakesley
725 South 8th Street, Suite 100
Las Vegas, Nevada 89101

DATED this 23 day of March, 2020

Pursuant to NRS 53.045, I declare under penalty of perjury that the foregoing is true and correct.

 (signature)
KORI CAGE
8655 Rowland Bluff Ave
Las Vegas, NV 89178
Phone: (702) 771-2506
kcage01@gmail.com
Appellant, Pro se

RECEIVED
MAR 25 2020
CLERK OF THE COURT

Exhibit 1

12/13/2019 Hearing Masters Recommendations

1 MRAO
2 STEVEN B. WOLFSON
3 DISTRICT ATTORNEY
4 Nevada Bar No. 001565
5 FAMILY SUPPORT DIVISION
6 1900 East Flamingo Road, Suite 100
7 Las Vegas, Nevada 89119-5168
8 (702) 671-9200
9 TTY and/or other relay services: 711
437763100A

District Court
CLARK COUNTY, NEVADA

6 Nevada Dept Of Health & Human Services, Div. Of)
7 Welfare & Supportive Services, and (Malika Coppedge),)
8 vs.)
9 Kori L Cage,)
Respondent.)

Case No. R136990

Department No. CHILD SUPPORT

MASTER'S RECOMMENDATION

11 This matter having been heard on DECEMBER 13, 2019 before the undersigned Hearing Master, having considered all the
12 evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

13 Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

14 ☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

15 ☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

Respondent's gross monthly income (GMI) : ; formula amount % of GMI=

16 Basis for deviation from state formula: R has 2 other minor children.

Respondent is to pay current support for the child(ren), Kyree Cage, Jayla Nicole Cage.

17 **CHILD SUPPORT**

Respondent is to pay monthly:

18 \$323.00 Temp child support
19 medical support (in lieu of health insurance)
20 spousal support
arrear payment

☐ ARREARAGES ☒ ARREARAGES NOT ADDRESSED AT THIS HEARING

21 TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren)
reach majority, become emancipated or further order of the Court.

22 Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

23 ☐ Good cause to stay income withholding is based on: _____. Said withholding shall be postponed until Respondent
becomes delinquent in an amount equal to 30 days support.

24 ☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____, is hereby
confirmed and is the controlling order for the following reasons: ☐ only order _____.

25 ☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this
noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

26 ☐ Respondent is referred to Employment Services for an appointment on _____ at _____ AM.

27 ☒ Health insurance coverage for the minor child(ren) herein:

☒ Respondent to provide: ☐ Petitioner to provide: ☐ Both Parties to provide:

28 ☐ if available through employer. ☒ shall provide per court order.

☐ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING
☐ MODIFICATION OF PRIOR ORDER:

☐ SUSPENSION OF LICENSES:

PAYMENTS

All mailed payments **MUST** be made in the form of a cashier's check, money order or business check **ONLY**, made payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are also accepted.

Payments can be mailed to:

State Collection and Disbursement Unit (SCaDU)
P.O. Box 98950
Las Vegas, Nevada 89193-8950

Payments can be made in person at:

State Collection and Disbursement Unit (SCaDU)
1900 East Flamingo Road
Las Vegas, Nevada 89119-5168

Additionally, the following information must be included with each payment: name (first, middle, last) of person responsible for paying child support, social security number of person responsible for paying child support, child support case number, and name of petitioner (first and last name of person receiving child support).

NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.

NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.

NOTICE: Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095. If the Respondent pays support through income withholding and the full obligation is not met by the amount withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be subject to assessment of penalties and interest. The Respondent may avoid these additional costs by making current support payments each month. If another state takes jurisdiction and obtains a new order, Nevada interest and penalties will only be calculated to the date of the new order and will be enforced.

NOTICE: Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

NOTICE: Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final Order/Judgment being ordered by District Court. However, the Master's Recommendation is not an Order/Judgment unless signed and filed by a Judge.

NOTICE: Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written Notice of Entry of Judgment.

NOTICE: Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address, change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10) days of such change.

Respondent to bring new financial statement and proof of income next date.

This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

Counsel for P is present, Mr. Blackham, Esq., and he is retained. Last payment-9/2019.

This matter in the D case of the parties was on appeal. There was an appellate decision made on 11-15-19; however, the remitter had not been received. Counsel represented that R had filed a request for rehearing/reconsideration. Court and Counsel are of the opinion that there is no jurisdiction at this time for the court to hear any issues in this matter.

Based upon the remitter issue, DA and Mr. Blackham agree, and R argues that he needs at least a temporary reprieve from the current support to avoid contempt. R is getting \$418/wk in UIB, which is \$1811 gmi. 25% is \$453/mo. Temporarily the court will permit a \$65 per child per month downward deviation for a total monthly support of \$323.00. effective December 1, 2019 until further order. This is to avoid contempt only. Until the court is clear on the remitter issue or until further order the underlying amount remains unchanged but any permanent modification will be as of 12-1-19. The court will set no arrears at this time pending the next court date.

R Medicaid for the children as of 12-13-19, court is uncertain if this is correct as it would appear from the appellate order that P is the PPC, but once again there is a remitter issue.

P is providing sports insurance for the children at the rate of \$66.95/mo. DA represents that it appears that R has continuously provided the health insurance for the children as it was ordered.

It is stressed that this order is temporary per stipulation of the parties pending the next court date.

At the next court date, the court and/or attorneys to research the remitter jurisdiction issue if the case is still at the appellate court. The D case to be consulted for any new orders regarding the impact of the portion that was remanded. The issues that have been raised in the motion and countermotion are all still ripe for determination. R and P to bring current pay information (stubs/2018 and 2019 tax returns and supporting documents) to the next court date.

NEXT HEARING DATE IS March 13, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: DECEMBER 13, 2019

MASTER

USJR DISPOSITIONS

- ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
- ☐ - Involuntary (Statutory) Dismissal
- ☐ - Dismissed / Want of Prosecution
- ☐ - Transferred to Another Jurisdiction
- ☐ - Other Manner of Dispo
 - ☐ - Close Case

**Respondent/Respondent's Attorney
Receipt of this document is
acknowledged by my signature.**

ORDER/JUDGMENT

☐ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this _____ day of _____, 20_____.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20_____ and this matter is remanded to Child Support Court on _____, 20_____ at _____M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

By:

Karen Cliffe

DEPUTY DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168

Exhibit 2

Petitioners Multiple Businesses and Assets

MAID IN HANCOCK LLC

Company Number

150903798

Status

Active

Incorporation Date

2 January 2019 (11 months ago)

Company Type

DOMESTIC LIMITED LIABILITY COMPANY

Jurisdiction

Oregon (US)

Registered Address

69 NE HANCOCK ST

PORTLAND

97213

OR

United States

Agent Name

AISHA CAMPBELL

Agent Address

69 NE HANCOCK ST, PORTLAND, OR, 97213

Directors / Officers

AISHA CAMPBELL, agent

MALIKA COPPEDGE, individual with direct knowledge

MALIKA COPPEDGE, manager

Registry Page

HOLDING HANDS LLC

Company Number

E0216572019-2

Native Company Number

E0216572019-2

Status

Active

Incorporation Date

9 May 2019 (7 months ago)

Company Type

Domestic Limited-Liability Company

Jurisdiction

Nevada (US)

Agent Name

MAX MILLER-HOOKS

Agent Address

3651 LINDELL RD #D366, LAS VEGAS, NV, 89103

Directors / Officers

MALIKA COPPEDGE, manager

MAX MILLER-HOOKS, agent

Recent filings for HOLDING HANDS LLC

9 May ARTICLES OF ORGANIZATION

2019

9 May INITIAL LIST

2019

MALIKA COPPEDGE, APRN LLC

Company Number

E0401892018-4

Native Company Number

E0401892018-4

Status

Active

Incorporation Date

24 August 2018 (over 1 year ago)

Company Type

Domestic Limited-Liability Company

Jurisdiction

Nevada (US)

Agent Name

MAX MILLER-HOOKS

Agent Address

3651 LINDELL RD #D366, LAS VEGAS, NV, 89103

Directors / Officers

MALIKA COPPEDGE, managing member

MAX MILLER-HOOKS, agent

Recent filings for MALIKA COPPEDGE, APRN LLC

24 Aug ARTICLES OF ORGANIZATION

Exhibit 3

9/12/2019 Petitioned modification date



Kori Lovett <kcage01@gmail.com>

Child Support Modification Packet

2 messages

Kori Lovett <kcage01@gmail.com>
To: Jason.Antonich@clarkcountyda.com

Thu, Sep 12, 2019 at 2:49 PM

Please see attached child support modification packet (4 attachments)

4 attachments **IMG_20190912_0001_Document.pdf**
555K **IMG_20190912_0003_Document.pdf**
267K **IMG_20190912_0004_Separation letter.pdf**
752K **IMG_20190912_0002_Document.pdf**
713K

Kori Lovett <kcage01@gmail.com>
To: Jason.Antonich@clarkcountyda.com

Thu, Sep 12, 2019 at 3:09 PM

Good evening Jason,

In addition to my previous email (child support packet). Will you please email me or mail me all the child support paid and due to Malika from March 2016 to present, as well as a descriptive breakdown of all fees, penalties, etc? This is the timeframe which needs to be audited.

Thank you for all your help,
Kori Cage

Original district court case number **R136990**
Current district court case number **D374223**
current Supreme Court case number **76006**

[Quoted text hidden]

Exhibit 4

3/13/2020 Hearing Masters Recommendations

1 MRAO
2 STEVEN B. WOLFSON
3 DISTRICT ATTORNEY
4 Nevada Bar No. 001565
5 FAMILY SUPPORT DIVISION
6 1900 East Flamingo Road, Suite 100
7 Las Vegas, Nevada 89119-5168
8 (702) 671-9200
9 TTY and/or other relay services: 711
10 437763100A

District Court
CLARK COUNTY, NEVADA

11 NEVADA DEPT OF HEALTH & HUMAN)
12 SERVICES, DIV. OF WELFARE & SUPPORTIVE)
13 SERVICES, AND (MALIKA COPPEDGE),)

Petitioner,)

Case No. 06R136990

14 vs.)

Department No. CHILD SUPPORT

15 KORI L CAGE,)

16 Respondent.)

MASTER'S RECOMMENDATION

17 This matter having been heard on MARCH 13, 2020 (Attorney Blakesley, #12802) before the undersigned Hearing Master,
18 having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and
19 Recommendations:

20 Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

21 ☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

22 ☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

23 Basis for deviation from state formula: 2 Additional children: Kamryn and Londyn.

24 Respondent is to pay current support for the child(ren), Kyree Cage, AND Jayla Nicole Cage.

CHILD SUPPORT

25 Respondent is to pay monthly:

26 \$323.00 Temp child support
27 medical support
28 spousal support
29 \$0.00 Temp arrear payment

☒ ARREARAGES ☐ ARREARAGES NOT ADDRESSED IN THIS ORDER

Arrears/Obligation period is 06/01/17 through 01/31/20.

Arrears, interest and penalty calculated through 1/31/20 by audit. For accounting purposes, the next payment is due 2/01/2020.

child support arrearage of	<u>\$1,574.48</u>	plus interest of	<u>\$728.38</u>	penalty of	<u>\$426.32</u>
medical support arrearage of	<u> </u>	plus interest of	<u> </u>	penalty of	<u> </u>
spousal support arrearage of	<u> </u>	plus interest of	<u> </u>		
medical expense arrearage of	<u> </u>				
genetic test costs of	<u> </u>				
total arrearages of	<u>\$1,574.48</u>	total interest	<u>\$ 728.38</u>	total penalty	<u>\$ 426.32</u>

GRAND TOTAL (arrearages + interest + penalty) = \$2,729.18

- ☐ The total arrears are hereby confirmed.
☒ The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040.
☐ Arrears of \$_____ subject to modification until _____, and arrears of \$_____ reduced to judgment.
☐ Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.
☐

\$ 323.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

- ☐ Good cause to stay income withholding is based on:_____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.
☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.
☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.
☒ Health insurance coverage for the minor child(ren) herein:
☒ Respondent to provide: ☐ Petitioner to provide: ☐ Both Parties to provide:
☐ if available through employer. ☒ shall provide per court order.
☒ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING

☒ MODIFICATION OF PRIOR ORDER:

☒ Modification effective: 12/01/19.

☒ This order modifies a previously existing, previously controlling support order. By this modification, this tribunal assumes or retains continuing, exclusive jurisdiction of the child support obligation for the child(ren) and parties identified in this order. Modification is proper for the following reason(s):

☒ The previously controlling order is from Clark County, Nevada, dated April 23, 2018, #D-07-374223-P.

☒ An individual party, Kori L. Cage, has requested modification of the previously controlling Nevada support order.

☐ An individual party, _____, has requested modification; this tribunal has personal jurisdiction over the non-movant and the issuing state (the state whose order controlled prior to this modification) is no longer the residence of any individual party/contestant or child(ren).

☐ An individual party, _____, has requested modification; all individual parties and children now reside in Nevada.

☐ All parties have filed written consent with the tribunal whose order controlled prior to this modification for this tribunal to modify the support obligation and assume continuing, exclusive jurisdiction.

☐ SUSPENSION OF LICENSES:

PAYMENTS

Steven B. Wolfson, District Attorney, Nevada Bar No. 001565
 Family Support Division
 1900 East Flamingo Road #180
 Las Vegas, Nevada 89119-5105

(702) 671-9200 - TTY and/or other relay services: 711

1 All mailed payments MUST be made in the form of a cashier's check, money order or business check ONLY, made
2 payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are
also accepted. Fees may apply.

3 **Payments can be mailed to:**

4 State Collection and Disbursement Unit (SCaDU)
5 P.O. Box 98950
6 Las Vegas, Nevada 89193-8950

7 **Payments can be made in person at:**

8 State Collection and Disbursement Unit (SCaDU)
9 1900 East Flamingo Road
10 Las Vegas, Nevada 89119-5168

11 Additionally, the following information must be included with each payment: name (first, middle, last) of person
12 responsible for paying child support, social security number of person responsible for paying child support, child
13 support case number, and name of petitioner (first and last name of person receiving child support).

14 **NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.**

15 **NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.**

16 **NOTICE:** Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant
17 to NRS 99.040. If the Respondent pays support through income withholding and the full obligation is not met by the amount
18 withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the
19 amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be
20 subject to assessment of interest. The Respondent may avoid these additional costs by making current support payments each
21 month. If another state takes jurisdiction and obtains a new order, Nevada interest will only be calculated to the date of the
22 new order and will be enforced.

23 **NOTICE:** Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and
24 Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the
25 support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this
26 purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

27 **NOTICE:** Objections/Appeals are governed by EDCR 1.40(e) and (f). You have ten (10) days from receipt of this Master's
28 Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final
Order/Judgment being ordered by District Court.

NOTICE: Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written
Notice of Entry of Judgment.

NOTICE: Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address,
change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10)
days of such change.

NOTICE: If you want to adjust the amount of child support established in this order, you MUST file a motion to modify the
order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the
child support obligation established in this order will continue until such time as all children who are the subject of this order
reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18
years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties
agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the
date the motion was filed.

Respondent to bring new financial statement and proof of income next date.

This order does not stay collection of support arrears by execution or any other means allowed by law.

Steven B. Wolfson, District Attorney, Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road #100
Las Vegas, Nevada 89119-5168

(702) 671-9200 - TTY and/or other relay services: 711

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

Last payment 3/02/20 UIB. Respondent's Unemployment Insurance Benefits may end 9/2020. Respondent testified he is diligently looking for work. He is to provide copies of Medicaid cards he has for childrent to DAFS caseworker within 30 days to then be forwarded to Petitioner. Respondent's request to retroactively modify support beyond the filing date of the motion is hereby DENIED. NRS.125B.3828 Petitioner's request for attorney fees is hereby DENIED. Respondent had a legal to file a motion to reduce. Respondent's request for further consideration of a reduction in support, such as this court consider the income of Petitioner, is DENIED. Respondent's request to reduce support has been GRANTED. Petitioner has sporadic income per her attorney.

NEXT HEARING DATE IS September 25, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: MARCH 13, 2020

[Signature]

MASTER

USJR DISPOSITIONS

- ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
☐ - Involuntary (Statutory) Dismissal
☐ - Dismissed / Want of Prosecution
☐ - Transferred to Another Jurisdiction
☐ - Other Manner of Dispo
☐ - Close Case

Respondent/Respondent's Attorney
 Receipt of this document is
 acknowledged by my signature.

ORDER/JUDGMENT

☐ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this _____ day of _____, 20_____.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20_____ and this matter is remanded to Child Support Court on _____, 20_____ at _____ M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
 Nevada Bar No. 001565

Steven B. Wolfson, District Attorney, Nevada Bar No. 001565
 Family Support Division
 1900 East Flamingo Road #200
 Las Vegas, Nevada 89119-5168

(702) 678-9200 - TTY and/or other relay services: 711

1 By: V. Mont Arde
2 DEPUTY DISTRICT ATTORNEY
3 FAMILY SUPPORT DIVISION
4 1900 East Flamingo Road, Suite 100
5 Las Vegas, Nevada 89119-5168
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Steven B. Wolfson, District Attorney, Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road #100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TTY and/or other relay services: 711

THIS SEALED
DOCUMENT,
NUMBERED PAGE(S)
140 - 142
WILL FOLLOW VIA
U.S. MAIL



RSPN
STEVEN B. WOLFSON
DISTRICT ATTORNEY

Nevada Bar No. 001565

FAMILY SUPPORT DIVISION

1900 East Flamingo Road, Suite 100

Las Vegas, Nevada 89119-5168

(702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

UPI-437763100A

DISTRICT COURT

CLARK COUNTY, NEVADA

Nevada Dept of Health & Human Services,)
Div. of Welfare & Supportive Services,)
(Malika Coppedge),)

Case no.: 06R136990

Petitioner,)

Dept. no.: J/
CHILD SUPPORT COURT

Vs

Kori L. Cage,

Respondent.)

DA RESPONSE TO OBJECTION

Date of Hearing: June 3, 2020

Time of Hearing: 10:00 AM

Department: J

COMES NOW, the STATE OF NEVADA, through STEVEN B. WOLFSON,
District Attorney, by and through Robert J. Gardner, Deputy District Attorney, and files
this D.A. Response to Objection.

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1 This Response is made and based upon the pleadings and papers on file herein,
2 the attached Points and Authorities, exhibit(s), if any, and oral argument, if any, at the
3 time of the hearing.

4 DATED this ____3rd____ day of April, 2020.

5 Respectfully Submitted,
6 STEVEN B. WOLFSON
7 DISTRICT ATTORNEY
8 Nevada Bar # 001565

9 BY: Robert J. Gardner
10 ROBERT J. GARDNER
11 Deputy District Attorney
12 Nevada Bar #6983

13 **POINTS AND AUTHORITIES:**

14 Respondent's objection was filed 3/30/20 regarding the hearing on 3/13/20. His
15 objection appears to be untimely. (See Exhibit A – Unfiled MROJ).
16 Objections/Appeals are governed by EDCR1.40 (c) and (f), which indicates the parties
17 have ten (10) days from receipt of the Master's Recommendation to serve and file
18 written objection to it. It also appears there is no clear error, as the Hearing Master
19 merely continued the court date to verify if the Remittitur from the Nevada Supreme
20 Court had been filed and placed this matter on for possible modification at the next
21 hearing. The Remittitur was filed on 2/21/2020, and the next court date is already set
22 for possible modification on 9-25-2020 at 0am, Dept 1.

23 Proceedings before the child support court are held in accordance with NRCP 53
24 ("Masters"). Its recommendations are issued per NRCP 53(e)(2), which directs that the
25 [District] "[C]ourt shall accept the master's findings of fact unless clearly erroneous."

26 "A finding is 'clearly erroneous' when although there is evidence to support it,
27 the reviewing court on the entire evidence is left with the definite and firm conviction
28 that a mistake has been committed." United States v. United States Gypsum Co., 333

1 U.S. 364, 395, 68 S.Ct. 525, 542 (1948); State v. McKellips, 118 Nev. 465, 469, 49
2 P.3d 655, 658 (Nev. 2002).

3 “A court has no discretion to apply the law or not as it sees fit. . . [I]f the
4 discretion is abused, the abuse may be reviewed and corrected by a higher tribunal.”
5 Goodman v. Goodman, 68 Nev. 484, 487-488, 236 P.2d 305, 306 (Nev. 1951). Courts
6 are not free to ignore their own rules. Ballard v. Commissioner, 544 U.S. 40, 59, 125
7 S.Ct. 1270, 1282 (2005).

8 The District Attorney does not represent either of the parties in this action as
9 there is currently no money owed to the State of Nevada, but there is prior welfare
10 involvement and the D.A. represents the State of Nevada Division of Welfare. NRS
11 125B.150(3).¹

12 ///

13 ///

14 ///

15 _____
16 ¹ **NRS 125B.150 Assistance by district attorney to establish parentage and obligation of support
17 and to enforce payment of support; confidentiality; regulations of welfare division.**

18 1. The district attorney of the county of residence of the child, or of a parent, alleged parent or
19 guardian who does not have physical custody of the child, shall take such action as is necessary to
20 establish parentage of the child and locate and take legal action, including the establishment or
21 adjustment of an obligation of support, against a person who has a duty to support the child when
22 requested to do so by the parent, alleged parent or guardian or a public agency which provides
23 assistance to the parent, alleged parent, guardian or child. If the court for cause transfers the action to
24 another county, the clerk of the receiving court shall notify the district attorney of that county, and that
25 district attorney shall proceed to prosecute the cause of action and take such further action as is
26 necessary to establish parentage and to establish or adjust the obligation of support and to enforce the
27 payment of support pursuant to this chapter or chapter 31A, 126, 130 or 425 of NRS.

28 2. In a county where the district attorney has deputies to aid him in the performance of his duties,
the district attorney shall designate himself or a particular deputy as responsible for performing the
duties imposed by subsection 1.

3. Except as otherwise provided in NRS 126.101, the district attorney and his deputies do not
represent the parent, alleged parent, guardian or child in the performance of their duties pursuant to
this chapter and chapter 31A, 126, 130 or 425 of NRS, but are rendering a public service as
representatives of the state.

...

(Added to NRS by 1969, 589; A 1979, 1281; 1981, 1574; 1987, 2252; 1989, 670, 1642; 1995,
2415; 1999, 874)

1 This action was brought pursuant to the District Attorney's public duty to
2 establish paternity and compel support and therefore appears as an attorney of record in
3 the case pursuant to NRS 125B.150 and NRS 425.380. Either party should consult their
4 own attorney if they have other legal questions on this case.

5 DATED this ____3rd____ day of April, 2020.

6 Respectfully Submitted,
7 STEVEN B. WOLFSON
8 DISTRICT ATTORNEY
9 Nevada Bar # 001565

10 BY: Robert J. Gardner
11 ROBERT J. GARDNER
12 Deputy District Attorney
13 Nevada Bar #6983
14
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Exhibit A

1 MRAO
2 STEVEN B. WOLFSON
3 DISTRICT ATTORNEY
4 Nevada Bar No. 001565
5 FAMILY SUPPORT DIVISION
6 1900 East Flamingo Road, Suite 100
7 Las Vegas, Nevada 89119-5168
8 (702) 671-9200
9 TTY and/or other relay services: 711
10 437763100A

District Court
CLARK COUNTY, NEVADA

11 NEVADA DEPT OF HEALTH & HUMAN)
12 SERVICES, DIV. OF WELFARE & SUPPORTIVE)
13 SERVICES, AND (MALIKA COPPEDGE),)

Petitioner,)

Case No. **06R136990**

14 vs.)

Department No. **CHILD SUPPORT**

15 KORI L CAGE,)

16 Respondent.)

MASTER'S RECOMMENDATION

17 This matter having been heard on **MARCH 13, 2020 (Attorney Blakesley, #12802)** before the undersigned Hearing Master,
18 having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and
19 Recommendations:

20 Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

21 ☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

22 ☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

23 Basis for deviation from state formula: 2 Additional children: Kamryn and Londyn.

24 Respondent is to pay current support for the child(ren), Kyree Cage, AND Jayla Nicole Cage.

CHILD SUPPORT

25 Respondent is to pay monthly:

\$323.00 Temp child support

medical support

spousal support

\$0.00 Temp arrears payment

☒ ARREARAGES ☐ ARREARAGES NOT ADDRESSED IN THIS ORDER

Arrears/Obligation period is 06/01/17 through 01/31/20.

Arrears, interest and penalty calculated through 1/31/20 by audit. For accounting purposes, the next payment is due 2/01/2020.

child support arrearage of \$1,574.48 plus interest of \$728.38 penalty of \$426.32

medical support arrearage of _____ plus interest of _____ penalty of _____

spousal support arrearage of _____ plus interest of _____

medical expense arrearage of _____

genetic test costs of _____

total arrearages of \$1,574.48 total interest \$ 728.38 total penalty \$ 426.32

GRAND TOTAL (arrearages + interest + penalty) = **\$2,729.18**

Exhibit A - Page 1

FINDING 1.5

☐ The total arrears are hereby confirmed.

☒ The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040.

☐ Arrears of \$_____ subject to modification until _____, and arrears of \$_____ reduced to judgment.

☐ Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.

☐

\$ 323.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

☐ Good cause to stay income withholding is based on:_____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.

☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

☒ Health insurance coverage for the minor child(ren) herein:

☒ Respondent to provide: ☐ Petitioner to provide: ☐ Both Parties to provide:

☐ if available through employer. ☒ shall provide per court order.

☒ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING

☒ MODIFICATION OF PRIOR ORDER:

☒ Modification effective: 12/01/19.

☒ This order modifies a previously existing, previously controlling support order. By this modification, this tribunal assumes or retains continuing, exclusive jurisdiction of the child support obligation for the child(ren) and parties identified in this order. Modification is proper for the following reason(s):

☒ The previously controlling order is from Clark County, Nevada, dated April 23, 2018, #D-07-374223-P.

☒ An individual party, Kori L Cage, has requested modification of the previously controlling Nevada support order.

☐ An individual party, _____, has requested modification; this tribunal has personal jurisdiction over the non-movant and the issuing state (the state whose order controlled prior to this modification) is no longer the residence of any individual party/contestant or child(ren).

☐ An individual party, _____, has requested modification; all individual parties and children now reside in Nevada.

☐ All parties have filed written consent with the tribunal whose order controlled prior to this modification for this tribunal to modify the support obligation and assume continuing, exclusive jurisdiction.

☐ SUSPENSION OF LICENSES:

PAYMENTS

1 All mailed payments MUST be made in the form of a cashier's check, money order or business check ONLY, made
2 payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are
also accepted. Fees may apply.

3 Payments can be mailed to:

State Collection and Disbursement Unit (SCaDU)
P.O. Box 98950
Las Vegas, Nevada 89193-8950

6 Payments can be made in person at:

State Collection and Disbursement Unit (SCaDU)
1900 East Flamingo Road
Las Vegas, Nevada 89119-5168

8 Additionally, the following information must be included with each payment: name (first, middle, last) of person
9 responsible for paying child support, social security number of person responsible for paying child support, child
support case number, and name of petitioner (first and last name of person receiving child support).

10 NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.

11 NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.

12 NOTICE: Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant
13 to NRS 99.040. If the Respondent pays support through income withholding and the full obligation is not met by the amount
withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the
14 amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be
subject to assessment of interest. The Respondent may avoid these additional costs by making current support payments each
15 month. If another state takes jurisdiction and obtains a new order, Nevada interest will only be calculated to the date of the
new order and will be enforced.

16 NOTICE: Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and
Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the
17 support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this
purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

18 NOTICE: Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's
19 Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final
Order/Judgment being ordered by District Court.

20 NOTICE: Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written
Notice of Entry of Judgment.

21 NOTICE: Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address,
22 change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10)
days of such change.

23 NOTICE: If you want to adjust the amount of child support established in this order, you MUST file a motion to modify the
24 order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the
child support obligation established in this order will continue until such time as all children who are the subject of this order
25 reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18
years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties
26 agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the
date the motion was filed.

27 Respondent to bring new financial statement and proof of income next date.

28 This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

Last payment 3/02/20 UIB. Respondent's Unemployment Insurance Benefits may end 9/2020. Respondent testified he is diligently looking for work. He is to provide copies of Medicaid cards he has for childrent to DAFS caseworker within 30 days to then be forwarded to Petitioner. Respondent's request to retroactively modify support beyond the filing date of the motion is hereby DENIED. NRS.125B.3828 Petitioner's request for attorney fees is hereby DENIED. Respondent had a legal to file a motion to reduce. Respondent's request for further consideration of a reduction in support, such as this court consider the income of Petitioner, is DENIED. Respondent's request to reduce support has been GRANTED. Petitioner has sporadic income per her attorney.

NEXT HEARING DATE IS September 25, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: MARCH 13, 2020



MASTER

USJR DISPOSITIONS

- ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
☐ - Involuntary (Statutory) Dismissal
☐ - Dismissed / Want of Prosecution
☐ - Transferred to Another Jurisdiction
☐ - Other Manner of Dispo
☐ - Close Case

Respondent/Respondent's Attorney
 Receipt of this document is
 acknowledged by my signature.

ORDER/JUDGMENT

☐ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this _____ day of _____, 20____.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20____ and this matter is remanded to Child Support Court on _____, 20____ at _____ M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
 Nevada Bar No. 001565

1 By: V. Monet Arde
2 DEPUTY DISTRICT ATTORNEY
3 FAMILY SUPPORT DIVISION
4 1900 East Flamingo Road, Suite 100
5 Las Vegas, Nevada 89119-5168
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1 CERT

Case no. 06R136990

2 CERTIFICATE OF MAILING

3 The foregoing DA Response to Objection was served upon Kori Lovett Cage by
4 mailing a copy thereof, first class mail, postage prepaid to:

5 Kori L. Cage
6 8655 Rowland Bluff Ave
7 Las Vegas NV 89178

8 on the 3rd day of April, 2020.

9
10 

11 _____
12 Employee, District Attorney's Office
13 Family Support Division
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1 CERT

Case no. 06R136990

2 CERTIFICATE OF MAILING

3 The foregoing DA Response to Objection was served upon Malika Coppedge by
4 mailing a copy thereof, first class mail, postage prepaid to:

5 Leah M. Blakesley, Esq.
6 GHANDI DEETER BLACKHAM
7 725 South Eighth Street, Suite 100
8 Las Vegas, NV 89101

9 on the 3rd day of April, 2020.



10
11 _____
12 Employee, District Attorney's Office
13 Family Support Division
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1 NOTC

2 STEVEN B. WOLFSON
3 DISTRICT ATTORNEY

4 Nevada Bar No. 001565

5 FAMILY SUPPORT DIVISION

6 1900 East Flamingo Road, Suite 100

7 Las Vegas, Nevada 89119-5168

8 (702) 671-9200 - TDD (702) 385-7486 (for the hearing impaired)

9 UPI-437763100A

10 **DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12 Nevada Dept of Health & Human Services,)
13 Div. of Welfare & Supportive Services,)
14 (Malika Coppedge),)

15 Petitioner,)

16 Vs

17 Kori L. Cage,

18 Respondent.)

Case no.: 06R136990

Dept. no.: J/
CHILD SUPPORT COURT

19 **NOTICE OF INTENT/REQUEST TO APPEAR**

20 **BY COMMUNICATION EQUIPMENT**

21 COMES NOW, STEVEN B. WOLFSON, CLARK COUNTY DISTRICT
22 ATTORNEY, by and through Robert J. Gardner, Deputy District Attorney, pursuant to
23 the Order Adopting Part IX Of The Supreme Court Rules filed December 18, 2008, and
24 hereby submits a Notice Of Intent To Appear By Communication Equipment for the:

25 (check one)

26 ☐ Case Management Conference

27 ☐ Motion Hearing

28 ☐ Trial Setting Conference

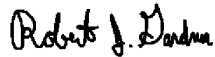
☒ Other: Respondent's Objection filed 3-30-2020, currently scheduled for the

3rd day of June, 2020 at 10:00 a.m. Pacific Time.

1 For the purposes of this appearance, as the assigned Deputy DA, Robert J.
2 Gardner, I can be reached at the following phone number is (702) 671-9482. This
3 Deputy believes it will be more beneficial and expedient to have access to the D.A.
4 Child Support computer systems at the time of the hearing due to the paperless nature of
5 our records. I understand that it is my responsibility to ensure that I can be reached at
6 this telephone number on the date and time of the hearing. I also understand that due to
7 the unpredictable nature of court proceedings, my hearing may be called at a time other
8 than the scheduled time. Further, I understand that my failure to be available at the
9 above stated telephone number will constitute a nonappearance.

10 Dated this ____3rd ____ day of April, 2020.

11
12 Respectfully Submitted,
13 Steven B. Wolfson
14 District Attorney
Nevada Bar No. 001565

15 

16 _____
17 ROBERT J. GARDNER, Deputy District Attorney
18 Nevada Bar No.: 00006983
19 FAMILY SUPPORT DIVISION
20 1900 East Flamingo Road, Suite 100
21 Las Vegas, NV 89119
22 (702) 671-9476
23
24
25
26
27
28



OPPC
GHANDI DEETER BLACKHAM

Brian E. Blackham, Esq.
Nevada Bar No. 9974
Email: brian@ghandilaw.com
Leah M. Blakesley, Esq.
Nevada Bar No. 12802
Email: leah@ghandilaw.com
725 S. 8th Street, Suite 100
Las Vegas, Nevada 89101
Telephone: (702) 878-1115
Facsimile: (702) 979-2485
Attorneys for Malika Coppedge

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human
Services, Div. Of Welfare & Supportive
Services, and (Malika Coppedge),

Petitioner,

vs.

Kori L. Cage,

Respondent.

Case No.: 06R136990

Dept. No.: CHILD SUPPORT

Date of Hearing: 06/03/2020

Time of Hearing: 10:00 a.m.

PETITIONER'S RESPONSE TO KORI L. CAGE'S OBJECTION
AND APPEAL THE MARCH 13, 2020 MASTERS RECOMMENDATIONS
AND
COUNTERMOTION TO ADOPT MASTER'S RECOMMENDATIONS IN
FULL, AND FOR ATTORNEY'S FEES AND COSTS

///

Petitioner, MALIKA COPPEDGE (Malika), by and through her attorneys, Brian E. Blackham, Esq., and Leah M. Blakeley, Esq., of GHANDI DEETER BLACKHAM, hereby files this Response and Countermotion and requests the relief stated herein.

This Response and Countermotion is made and based upon the papers and pleadings on file herein, the Points and Authorities submitted herewith, and any argument, which may be adduced at the time of hearing.

DATED this 7th day of April 2020.

GHANDI DEETER BLACKHAM



Brian E. Blackham, Esq.
Nevada Bar No. 9974
725 S. 8th Street, Suite 100
Las Vegas, Nevada 89101
Attorney for Petitioner

/ / /

/ / /

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **STATEMENT OF FACTS**

4 1. Malika and Respondent Kori Cage (Kori) were never married.
5 However, there are two minor children the issue of their relationship, to wit: Kyree
6 Lovett Cage (Kyree), born December 3, 2004, and Jayla Nicole Cage (Jayla), born
7 February 20, 2007.

8 2. Pursuant to the Findings of Fact, Conclusions of Law, Decision and
9 Orders (FFCLJ), entered by the District court in case no. D-07-374223-P on April
10 23, 2018, Malika was awarded primary physical custody of the minor children,
11 subject to Kori's right to specified visitation.

12 3. Based on the custodial timeshare, and Kori's reported income of
13 \$3,262.44 Malika was awarded child support in the amount of \$815.61, due on the
14 first day of each month. Kori was ordered to maintain health insurance for the
15 minor children, with the parties sharing equally in the cost of unreimbursed medical
16 expenses.

17 4. Since the entry of the FFCLJ, Kori requested that his child support
18 obligation be modified and/or suspended based on his termination in employment.

19 5. On December 13, 2019, a hearing was held regarding Kori's request
20 to modify and/or suspended his child support obligation. The hearing master issued

1 the following recommendations, which Malika asks that the Court affirm and adopt
2 as the Order of this Court¹:

- 3 a. Temporarily the Court will permit a \$65 per child per month
4 downward deviation for a total monthly support of \$323.00,
5 Effective December 1, 2019, until further order;
- 6 b. Until the Court is clear on the remitter issue or until further
7 order, the underlying amount remains unchanged, but any
8 permanent modification will be as of December 1, 2019;
- 9 c. The Court set no arrears at this time, pending the next Court
10 date;
- 11 d. This Order is temporary per stipulation of the parties pending
12 the next Court date;
- 13 e. The D case to be consulted for any new Orders regarding the
14 impact of the portion that was remanded;
- 15 f. The issues that have been raised in the Motion and
16 Countermotion are still ripe for determination; and
- 17 g. A hearing date was scheduled for March 13, 2020.

18 6. On March 13, 2020, the hearing was held regarding issues still ripe for
19 determination mainly, the status of Kori's appeal and the issue of child support

20 ¹ See Exhibit 1, Report and Recommendations filed on 01/07/2020.

1 arrears. The Court was advised that Kori's appeal was denied however, the Court's
2 order holding Malika's prior child support obligation in abeyance, an issue
3 collateral to the issues presently before the Court, was reversed and remanded to
4 the District court. At the time of hearing, a remittitur had still not issued in the
5 District court case. The District Attorney advised the Court that Kori had
6 outstanding child support arrears in the amount of \$2,729.18, which were
7 intercepted from Kori's 2019 tax return. The Court inquired as to the status of Kori's
8 employment and employment efforts, and Kori advised he was still unemployed
9 and receiving unemployment benefits in the amount of \$1,811.00 per month. The
10 District attorney advised that Kori's unemployment benefits were expected to
11 conclude in September 2020 and as such, the Court set a status check for September
12 30, 2020 and issued the following recommendations, which Malika asks that the
13 Court affirm and adopt as the Order of this Court²:

- 14 a. The Court denied Kori's request for a further reduction in child
15 support based on the relative income of the parties;
- 16 b. The Court denied Kori's request to retroactively apply his
17 modified child support obligation to a date prior to the filing of
18 his Motion to Modify;
- 19 c. The Court denied Malika's request for attorney's fees and costs;

20

² See, Exhibit 2, Master's Recommendations, signed March 13, 2020.

1 d. The Court ordered Kori's child support obligation to Malika to
2 remain at \$323.00 per month, due on the first of each month,
3 which was effective December 1, 2019 based on Kori's
4 underlying modification request;

5 e. The Court ordered Kori to provide the District attorney with a
6 copy of the minor children's Medicaid insurance cards by April
7 13, 2020.

8 7. On March 23, 2020, Kori filed an Objection to the Hearing Master's
9 Recommendations. This Opposition follows.

10 **II.**

11 **ARGUMENT**

12 **A. This Court Should Affirm and Adopt the Master's Recommendation for**
13 **Child Support.**

14 EDCR 1.31 governs child support hearing masters, and states the following,
15 in pertinent part:

16 (a) The chief judge shall appoint a presiding judge to manage the
family division of the district court.

17 (b) The presiding judge is responsible for the following judicial duties:

18 . . .

19 ///

20 ///

1 (5) Child Support Calendars:

2 (i) To refer all child support cases to hearing masters,
3 direct the appointment of said masters with the approval
4 of the family division judges, hear all objections to the
5 master's findings, unless another family division judge has
6 been assigned to the matter, and direct the enforcement
7 thereof as may be appropriate.

8 (ii) Meet with and supervise the activities of the child
9 support hearing masters in the performance of their duties
10 under Rule 1.40.

11 (iii) Review and sign off on recommendations of the child
12 support masters with respect to disposition of all child
13 support petitions unless the matter has been assigned to a
14 specific family division judge.

15 ...

16 NRS 3.405 states the following, in pertinent part:

17 ...

18 2. The court may appoint a master to hear all cases in a county to
19 establish or enforce an obligation for the support of a child, or to modify
20 or adjust an order for the support of a child pursuant to NRS 125B.145.

3. The master must be an attorney licensed to practice in this State.
The master:

(a) Shall take testimony and establish a record;

(b) In complex cases shall issue temporary orders for support
pending resolution of the case;

(c) Shall make findings of fact, conclusions of law and
recommendations for the establishment and enforcement of an
order;

1 (d) May accept voluntary acknowledgments of paternity or
2 liability for support and stipulated agreements setting the amount
of support;

3 (e) May, subject to confirmation by the district court, enter
4 default orders against a responsible parent who does not respond
to a notice or service within the required time; and

5 (f) Has any other power or duty contained in the order of
6 reference issued by the court.

7 If a temporary order for support is issued pursuant to paragraph
8 (b), the master shall order that the support be paid to the Division
9 of Welfare and Supportive Services of the Department of Health
and Human Services, its designated representative or the district
10 attorney, if the Division of Welfare and Supportive Services or
district attorney is involved in the case, or otherwise to an
appropriate party to the action, pending resolution of the case.

11 4. The findings of fact, conclusions of law and recommendations of
12 the master must be furnished to each party or the party's attorney at the
13 conclusion of the proceeding or as soon thereafter as possible. Within
14 10 days after receipt of the findings of fact, conclusions of law and
15 recommendations, either party may file with the court and serve upon
the other party written objections to the report. **If no objection is filed,
the court shall accept the findings of fact, unless clearly erroneous,
and the judgment may be entered thereon. If an objection is filed
within the 10-day period, the court shall review the matter upon
notice and motion.**

16 (Emphasis supplied).

17 ///

18 ///

19 ///

20

1 Malika addresses each of Kori's "objections" as follows:

2 1. Did the district court abuse its discretion by ignoring NRS 125.080(9) in
3 particular (L) the relative income of both parties when determining
4 Respondent's temporary child support obligation?

5 Kori has repeatedly attempted to reduce, if not eliminate, his child support
6 obligation to the children by alleging Malika's income is greater than his. What
7 Kori fails to accept is that although the Court may consider the relative income of
8 the parties when determining a child support obligation, the Court is not required to
9 deviate downward in setting a child support obligation, even after considering the
10 relative income of the parties. Neither the Nevada Revised Statutes nor the Nevada
11 Administrative Code require the Court to make a downward deviation in child
12 support even after considering the relative income of the parties. In accordance with
13 NAC 425.150, the Court *may* adjust a child support obligation in accordance with
14 the specific needs of the child and the economic circumstances of the parties by
15 considering, among other things, the relative income of both households, so long as
16 the adjustment does not exceed the total obligation of the other party. Nevertheless,
17 Kori repeatedly argues, without providing any valid legal support, that the Court
18 must not only consider the relative income of the parties but, after doing so, must
19 *eliminate* his child support obligation entirely based on the financial condition of
20

1 the parties and mainly, Kori's continued unemployment.³ This is not what the law
2 requires and thus, Kori's position is entirely without basis.

3 Kori's citation to Chambers v. Sanderson, 107 Nev. 846 (1991) in support of
4 his position is misplaced. In Chambers, the dispute was not between two parents,
5 but between a child and the child's father. The that case, the court awarded Plaintiff
6 Tara, the child of Defendant Jay Sanders, via her guardian ad litem, child support
7 in the amount of \$500.00 per month and ordered Jay to execute an IRS release for
8 his tax returns for the prior three years.⁴ The court also granted Tara's request for
9 discovery as to the true nature of Jay's income.⁵ After Jay refused to execute the
10 IRS release, the court reversed its previous order regarding release of the income
11 tax returns, rescinded its order permitting discovery, and made the \$500.00 child
12 support award permanent.⁶ On appeal, the Supreme Court held that the district court
13 erred in denying's Tara's request for additional discovery on Jay's income as the
14 Court has discretion to increase child support based on the income of the parties,
15 not just the needs of the child.⁷ The Court further held that Jay's income was entirely

17 ³ The Court will note that Kori alleges that he was terminated from his employment on September
18 10, 2019 and therefore was entirely unrelated to the Covid-19 pandemic. Kori has therefore been
19 unemployed for almost *seven months*. Given the strength of the economy for most of the time
since his termination, it is fair to conclude that Kori's unemployment was willful for some portion
of that time prior to implementation of the shelter in place directives in March 2020.

20 ⁴ See Chamber by Cochrain v. Sanderson, 107 Nev. 846 (1991).

⁵ Id.

⁶ Id.

⁷ Id.

1 relevant pursuant to NRS 125B.020, which states that parents have a duty to provide
2 children necessary maintenance, health care, education and support.⁸ Thus, the
3 holding in Chambers in no way requires the Court to eliminate Kori's child support
4 obligation based upon the income of Malika, the primary physical custodian.
5 Rather, just as in the present case, Chambers affirms that the Court must base child
6 support on the noncustodial parent's true income. Here, Kori is the noncustodial
7 parent, and all Malika is asking is that the Court affirm a Master's Recommendation
8 that does precisely what Chambers and the clear statutory authority requires.

9 As Kori has failed to show that the Court abused its discretion in refusing to
10 consider Malika's income for the purpose of eliminating Kori's child support
11 obligation as he demands, the hearing Master's Recommendation should be
12 affirmed.

13 2. Did the district court abuse its discretion by ignoring the new child support
14 regulations (22% for 2 children) codified in Chapter 425 of the Nevada
Administrative Code?

15 Kori's Motion to Modify child support was filed on November 4, 2019. The
16 first hearing was held on December 13, 2019. At the time of hearing, NRS 125B.070
17 and NRS 125B.080 were in effect and accordingly, the Court temporarily modified
18 Kori's child support obligation in accordance with NRS 125B.070, i.e. Kori's child
19 support obligation was calculated at 25%. At the time of hearing, the Court also

20 _____
⁸ Id.

1 gave Kori a downward deviation for the support of his other children in the amount
2 of \$65.00. At the continued hearing on March 13, 2020, the Court affirmed Kori's
3 modified child support obligation, as Kori's child support was already modified at
4 the December 13, 2019, hearing based on his underlying request to modify in
5 accordance with the statutes in effect at the time of the initial hearing. Kori did not
6 file a subsequent request for modification after the December 13, 2019 hearing and
7 more importantly, Kori's child support obligation had already been modified at the
8 December 13, 2019 hearing in accordance with the statutes in effect at that time. As
9 such, the Court did not err in declining to modify Kori's child support obligation at
10 the March 13, 2020 hearing, as this was already done at the December 13, 2019
11 hearing.

12 3. Did the district court abuse its discretion by its non-complex temporary
13 order ignoring NRS 125B.145 and setting a new hearing date for 9/25/2020?

14 Although it is difficult to ascertain the issue Kori has with the Court setting
15 a return hearing on September 25, 2020, or NRS 125B.145 to this setting, at the
16 hearing on March 13, 2020, the district attorney advised that Kori's unemployment
17 benefits are expected to conclude in September 2020. The anticipated conclusion of
18 Kori's unemployment benefits will undoubtedly affect his child support obligation,
19 and because Kori remains under a continuing obligation to obtain gainful
20 employment, to cease collection of unemployment benefits upon obtaining

1 employment, and to continue supporting the minor children at issue, the Court did
2 not abuse its discretion in setting a return hearing on September 25, 2020.

3 4. Did the district court abuse its discretion with its sua sponte order reducing
4 child support arrears to judgment ignoring NRS 425.470?

5 On or about March 21, 2018, in the underlying district court case, a hearing
6 was held on Malika's motion to reduce outstanding child support arrears in the
7 amount of \$4,221.30 to judgment. Kori received a copy of the motion, filed and
8 opposition, and was present at the time of hearing. At the time of hearing, Kori's
9 outstanding child support arrears in the amount of \$4,221.30 were reduced to
10 judgment against him. Since that time, the district attorney has been collecting
11 arrears against Kori. At the time of the March 13, 2020 hearing, the district attorney
12 advised that Kori's child support arrearages were technically "\$0" because Kori's
13 2019 tax return was intercepted to fulfill Kori's outstanding child support arrears.
14 Although the refund was intercepted, it had not yet been collected by the district
15 attorney, and the Court therefore made a finding of the outstanding child support
16 arrears. Nevertheless, the arrears are anticipated to be paid via Kori's intercepted
17 2019 tax refund.

18 Given Kori's outstanding child support arrears arose from a hearing which
19 Kori opposed and attended, the Court did not abuse its discretion in reducing Kori's
20 outstanding child support arrears to judgment.

1 5. Did the district court abuse its discretion by setting the modification date
2 to 12/1/2019 with no good cause findings on record rather than the date
3 petitioned 9/12/2019 in accordance to 42 U.S.C. Sec. 666(a)(9)(c)⁹?

4 NRS 125B.140 states the following, in pertinent part:

5 1. Except as otherwise provided in chapter 130 of NRS
6 and NRS 125B.012:

7 (a) If an order issued by a court provides for payment for
8 the support of a child, that order is a judgment by operation
9 of law on or after the date a payment is due. Such a
10 judgment may not be retroactively modified or adjusted
11 and may be enforced in the same manner as other
12 judgments of this State.

13 (b) Payments for the support of a child pursuant to an
14 order of a court which have not accrued at the time either
15 party gives notice that the party has filed a motion for
16 modification or adjustment may be modified or adjusted
17 by the court upon a showing of changed circumstances,
18 whether or not the court has expressly retained jurisdiction
19 of the modification or adjustment.

20 2. Except as otherwise provided in subsection 3 and NRS
 125B.012, 125B.142 and 125B.144:

 Although Kori alleges he became unemployed in September 2019 and at that
time notified the district attorney of his request to modify, Kori's Motion to Modify
was not filed until November 4, 2019. There is no law, statutory or otherwise, that
allows for a retroactive modification to the time in which someone alleges they
became unable to pay support. NRS 125B.140(1)(b) provides that *payments for the*

⁹ Kori's citation to a federal statute is inapplicable to the instant matter.

1 *support of a child pursuant to an order of a court which have not accrued at the*
2 *time either party gives notice that the party has filed a motion for modification or*
3 *adjustment may be modified or adjusted by the court upon a showing of changed*
4 *circumstances, whether or not the court has expressly retained jurisdiction of the*
5 *modification or adjustment.*

6 Pursuant to NRS 125B.140, at the time of filing of Kori's Motion to Modify
7 on November 4, 2019, his November 1, 2019 child support had already become
8 due. As such, the Court can only modify child support payments not yet accrued
9 after the filing of Kori's motion on November 4, 2019, which the Court did by
10 making Kori's modified child support obligation effective December 1, 2019 in
11 accordance with NRS 125B.140. As such, the Court did not abuse its discretion in
12 making Kori's modified child support obligation effective December 1, 2019.

13 6. Did the district court abuse its discretion by denying Respondent's request
14 for Petitioner to show cause in accordance to NRS Rule 11(b)(1)?

15 Kori's allegation that the hearing master abused her discretion by failing to
16 order Malika to show cause is entirely without merit. Kori has repeatedly alleged
17 that undersigned counsel and/or Malika are involved in some kind of ongoing
18 conspiracy against him as he is displeased with this Court's, and the district court's,
19 orders in this matter. Mainly, Kori has repeatedly argued in this Court and the
20 district court that Malika and undersigned counsel should be sanctioned for

1 opposing his requests. This is no basis for a show cause order. Kori has repeatedly
2 failed to point to a single valid instance, legally, procedurally, or otherwise, in
3 which Malika and/or undersigned counsel and/or this Court have violated NRC
4 11, the judicial canons, or any of Kori's due process rights.

5 Additionally, in response to Kori's "objection" to providing the children's
6 Medicaid cards to the district attorney, who in turn will provide them to Malika,
7 Kori's argument is entirely without merit. Kori was ordered by the district court to
8 maintain health insurance for the benefit of the children. Kori has maintained health
9 insurance for the minor children, for the most part, for years. Kori's issue with
10 providing copies of the children's Medicaid cards to Malika to also use on behalf
11 of the minor children is entirely without merit, as he is required to provide a copy
12 of the children's health insurance cards to Malika to also use on their behalf, as he
13 has done for years prior.

14 As such, the Court did not abuse its discretion in failing to order Malika
15 and/or undersigned counsel to show cause.

16 For these reasons, the Master's Recommendation should be affirmed.

17 **B. Malika Should Be Awarded Her Attorney's Fees and Costs In the**
18 **Amount of \$3,000.00 for Being Forced to Respond to Kori's Objection.**

19 NRS 18.010 provides, in pertinent part, as follows:

- 20 1. The compensation of an attorney and counselor for his or her
services is governed by agreement, express or implied, which is
not restrained by law.

1 2. In addition to the cases where an allowance is authorized by
2 specific statute, the court may make an allowance of attorney's
fees to a prevailing party:

3 (a) When the prevailing party has not recovered more
4 than \$20,000; or

5 (b) Without regard to the recovery sought, when the court
6 finds that the claim, counterclaim, cross-claim or third-
7 party complaint or defense of the opposing party was
8 brought or maintained without reasonable ground or to
9 harass the prevailing party. The court shall liberally
10 construe the provisions of this paragraph in favor of
11 awarding attorney's fees in all appropriate situations. It is
12 the intent of the Legislature that the court award attorney's
fees pursuant to this paragraph and impose sanctions
pursuant to Rule 11 of the Nevada Rules of Civil
Procedure in all appropriate situations to punish for and
deter frivolous or vexatious claims and defenses because
such claims and defenses overburden limited judicial
resources, hinder the timely resolution of meritorious
claims and increase the costs of engaging in business and
providing professional services to the public.

13 Furthermore, EDCR 7.60(b) states:

14 ...

15 (b) The court may, after notice and an opportunity to be heard,
16 impose upon an attorney or a party any and all sanctions which
17 may, under the facts of the case, be reasonable, including the
imposition of fines, costs or attorney's fees when an attorney or
a party without just cause:

18 (1) Presents to the court a motion or an opposition to a
19 motion which is obviously frivolous, unnecessary or
unwarranted.

20 (2) Fails to prepare for a presentation.

1 (3) So multiplies the proceedings in a case as to increase
2 costs unreasonably and vexatiously.

3 (4) Fails or refuses to comply with these rules.

4 (5) Fails or refuses to comply with any order of a judge of
5 the court.

6 The Nevada Supreme Court has also held that attorney's fee awards to pro
7 bono counsel are proper. Miller v. Wilfong, 121 Nev. 619, 119 Nev. P.3d 727, 730
8 (2005). However, the party requesting fees must (1) provide the basis for the fee
9 request; and (2) evaluate the factors set forth in Brunzell v. Golden Gate National
Bank, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969). These factors are:

10 1. *The Qualities of the Advocate*: his ability, his training,
11 education, experience, professional standing and skill.

12 2. *The Character of the Work to Be Done*: its difficulty, its
13 intricacy, its importance, time and skill required, the
responsibility imposed and the prominence and character of the
parties where they affect the importance of the litigation.

14 3. *The Work Actually Performed by the Lawyer*: the skill, time
15 and attention given to the work.

16 4. *The Result*: whether the attorney was successful and what
17 benefits were derived.

18 Each of these factors should be given consideration, and no one element
19 should predominate or be given undue weight. Miller v. Wilfong, 121 Nev. 619,
20 119 P.3d 727, 730 (2005). Additional guidance is provided by reviewing the

1 “attorney’s fees” cases most often cited in Family Law. Fletcher v. Fletcher, 89
2 Nev. 540, 516 P.2d 103 (1973); Levy v. Levy, 96 Nev. 902, 620 P.2d 860 (1980),
3 Hybarger v. Hybarger, 103 Nev. 255, 737 P.2d 889 (1987). The Brunzell factors
4 require counsel to make a representation as to the “qualities of the advocate,” the
5 character and difficulty of the work performed, and the work actually performed by
6 the attorney.

7 First, respectfully, we suggest that undersigned counsel is A/V rated and a
8 Certified Specialist in Nevada family law and has practiced primarily in the area of
9 family law for over 12 years. As to the “character and quality of the work
10 performed,” we ask the Court to find our work in this matter to have been adequate,
11 both factually and legally; we have diligently reviewed the applicable law, explored
12 the relevant facts, and believe that we have properly applied one to the other.
13 Finally, as to the result reached, this remains to be determined when the Court rules
14 on the present Response and Countermotion.

15 As shown above, Kori has brought this Objection in bad faith, failing to apply
16 the applicable legal standard or proffer any facts that would justify his baseless
17 demand that the recommendations of the Hearing Master be ignored by the Court.

18 Accordingly, this Court should enter an award for Malika’s attorney’s fees
19 and costs in an amount not less than \$3,000.00 and reduce the same to judgment
20 against Kori and in favor of Malika, collectible by any lawful means.

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III.

CONCLUSION

In light of the authority and facts as stated above, Malika respectfully requests an Order granting the following relief:

- 1. Denying Kori’s Objection in its entirety;
- 2. Affirming and adopting the Master’s Recommendations;
- 3. Awarding Malika her attorneys’ fees in the amount of \$3,000 for being forced to file the instant Response and Countermotion; and
- 4. For such other and further relief as this Court deems just and proper.

DATED this 7th day of April 2020.

Respectfully Submitted,
GHANDI DEETER BLACKHAM



Brian E. Blackham, Esq.
Nevada Bar No. 9974
725 S. 8th Street, Suite 100
Las Vegas, Nevada 89101
Attorney for Petitioner

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 7th day of April 2020, I served a copy of the foregoing PETITIONER’S OPPOSITION TO KORI L. CAGE’S OBJECTION AND APPEAL THE MARCH 13, 2020 MASTERS RECOMMENDATIONS AND COUNTERMOTION TO ADOPT MASTER’S RECOMMENDATIONS IN FULL, AND FOR ATTORNEY’S FEES AND COSTS upon each of the parties and addressed to those counsel of record:

- ☐ Electronic Service to:
- ☐ Via Facsimile to:
- ☐ Via Email to:
- ☒ Placing in the U.S. Mail, with postage fully prepaid, addressed to:

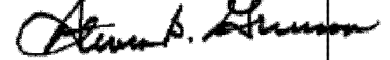
Steven B. Wolfson, DA	Kori Cage
Family Support Division	8655 Rowland Bluff Ave.
1900 E. Flamingo Road, Suite 100	Las Vegas, NV 89178
Las Vegas, NV 89119	Respondent

/s/ Theresa Calabrese-Vance
An employee of Ghandi Deeter Blackham

EXHIBIT 1

MRAO
STEVEN B. WOLFSON
DISTRICT ATTORNEY
Nevada Bar No. 001565
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200
TTY and/or other relay services: 711
437763100A

Electronically Filed
1/7/2020 11:13 AM
Steven D. Grierson
CLERK OF THE COURT



District Court

CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human Services, Div. Of)
Welfare & Supportive Services, and (Malika Coppedge),)
Petitioner,)
vs.)
Kori L Cage,)
Respondent.)

Case No. R136990

Department No. CHILD SUPPORT

MASTER'S RECOMMENDATION

This matter having been heard on DECEMBER 13, 2019 before the undersigned Hearing Master, having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

Respondent's gross monthly income (GMI) : ; formula amount % of GMI=

Basis for deviation from state formula: R has 2 other minor children.

Respondent is to pay current support for the child(ren), Kyree Cage, Jayla Nicole Cage.

CHILD SUPPORT

Respondent is to pay monthly:

\$323.00 Temp child support

medical support (in lieu of health insurance)

spousal support

arrears payment

☐ ARREARAGES ☒ ARREARAGES NOT ADDRESSED AT THIS HEARING

\$ 323.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

☐ Good cause to stay income withholding is based on: _____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.

☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, # _____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

☐ Respondent is referred to Employment Services for an appointment on _____ at _____ AM.

☒ Health insurance coverage for the minor child(ren) herein:

☒ Respondent to provide: ☐ Petitioner to provide: ☐ Both Parties to provide:

☐ if available through employer. ☒ shall provide per court order.

☐ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING

☐ MODIFICATION OF PRIOR ORDER:

☐ SUSPENSION OF LICENSES:

PAYMENTS

All mailed payments MUST be made in the form of a cashier's check, money order or business check ONLY, made payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are also accepted.

Payments can be mailed to:

State Collection and Disbursement Unit (SCaDU)
P.O. Box 98950
Las Vegas, Nevada 89193-8950

Payments can be made in person at:

State Collection and Disbursement Unit (SCaDU)
1900 East Flamingo Road
Las Vegas, Nevada 89119-5168

Additionally, the following information must be included with each payment: name (first, middle, last) of person responsible for paying child support, social security number of person responsible for paying child support, child support case number, and name of petitioner (first and last name of person receiving child support).

NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.

NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.

NOTICE: Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. A 10% penalty will be assessed on each unpaid installment, or portion thereof, of an obligation to pay support for a child, pursuant to NRS 125B.095. If the Respondent pays support through income withholding and the full obligation is not met by the amount withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be subject to assessment of penalties and interest. The Respondent may avoid these additional costs by making current support payments each month. If another state takes jurisdiction and obtains a new order, Nevada interest and penalties will only be calculated to the date of the new order and will be enforced.

NOTICE: Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

NOTICE: Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final Order/Judgment being ordered by District Court. However, the Master's Recommendation is not an Order/Judgment unless signed and filed by a Judge.

NOTICE: Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written Notice of Entry of Judgment.

NOTICE: Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address, change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10) days of such change.

Respondent to bring new financial statement and proof of income next date.

This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

Counsel for P is present, Mr. Blackham, Esq., and he is retained. Last payment-9/2019.

This matter in the D case of the parties was on appeal. There was an appellate decision made on 11-15-19; however, the remitter had not been received. Counsel represented that R had filed a request for rehearing/reconsideration. Court and Counsel are of the opinion that there is no jurisdiction at this time for the court to hear any issues in this matter.

Based upon the remitter issue, DA and Mr. Blackham agree, and R argues that he needs at least a temporary reprieve from the current support to avoid contempt. R is getting \$418/wk in UIB, which is \$1811 gmi. 25% is \$453/mo. Temporarily the court will permit a \$65 per child per month downward deviation for a total monthly support of \$323.00. effective December 1, 2019 until further order. This is to avoid contempt only. Until the court is clear on the remitter issue or until further order the underlying amount remains unchanged but any permanent modification will be as of 12-1-19. The court will set no arrears at this time pending the next court date.

R Medicaid for the children as of 12-13-19, court is uncertain if this is correct as it would appear from the appellate order that P is the PPC, but once again there is a remitter issue.

P is providing sports insurance for the children at the rate of \$66.95/mo. DA represents that it appears that R has continuously provided the health insurance for the children as it was ordered.

It is stressed that this order is temporary per stipulation of the parties pending the next court date.

At the next court date, the court and/or attorneys to research the remitter jurisdiction issue if the case is still at the appellate court. The D case to be consulted for any new orders regarding the impact of the portion that was remanded. The issues that have been raised in the motion and countermotion are all still ripe for determination. R and P to bring current pay information (stubs/2018 and 2019 tax returns and supporting documents) to the next court date.

NEXT HEARING DATE IS March 13, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: DECEMBER 13, 2019

MASTER

USJR DISPOSITIONS

- ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
☐ - Involuntary (Statutory) Dismissal
☐ - Dismissed / Want of Prosecution
☐ - Transferred to Another Jurisdiction
☐ - Other Manner of Dispo
☐ - Close Case

**Respondent/Respondent's Attorney
 Receipt of this document is
 acknowledged by my signature.**

ORDER/JUDGMENT

☒ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this _____ day of _____, 20_____.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20_____ and this matter is remanded to Child Support Court on _____, 20_____ at _____, M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

By: *Karen Cliffe*

DEPUTY DISTRICT ATTORNEY
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168

EXHIBIT 2

1 MRAO
2 STEVEN B. WOLFSON
3 DISTRICT ATTORNEY
4 Nevada Bar No. 001565
5 FAMILY SUPPORT DIVISION
6 1900 East Flamingo Road, Suite 100
7 Las Vegas, Nevada 89119-5168
8 (702) 671-9200
9 TTY and/or other relay services: 711
10 437763100A

District Court
CLARK COUNTY, NEVADA

11 NEVADA DEPT OF HEALTH & HUMAN)
12 SERVICES, DIV. OF WELFARE & SUPPORTIVE)
13 SERVICES, AND (MALIKA COPPEDGE),)

Petitioner,)

Case No. **06R136990**

14 vs.)

Department No. **CHILD SUPPORT**

15 KORI L CAGE,)

16 Respondent.)

MASTER'S RECOMMENDATION

17 This matter having been heard on **MARCH 13, 2020 (Attorney Blakesley, #12802)** before the undersigned Hearing Master,
18 having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and
19 Recommendations:

20 Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

21 ☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

22 ☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

23 Basis for deviation from state formula: 2 Additional children: Kamryn and Londyn.

24 Respondent is to pay current support for the child(ren), Kyree Cage, AND Jayla Nicole Cage.

CHILD SUPPORT

25 Respondent is to pay monthly:

\$323.00 Temp child support

medical support

spousal support

\$0.00 Temp arrears payment

☒ ARREARAGES ☐ ARREARAGES NOT ADDRESSED IN THIS ORDER

Arrears/Obligation period is 06/01/17 through 01/31/20.

Arrears, interest and penalty calculated through 1/31/20 by audit. For accounting purposes, the next payment is due 2/01/2020.

child support arrearage of \$1,574.48 plus interest of \$728.38 penalty of \$426.32

medical support arrearage of _____ plus interest of _____ penalty of _____

spousal support arrearage of _____ plus interest of _____

medical expense arrearage of _____

genetic test costs of _____

total arrearages of \$1,574.48 total interest \$ 728.38 total penalty \$ 426.32

GRAND TOTAL (arrearages + interest + penalty) = **\$2,729.18**

☐ The total arrears are hereby confirmed.

☒ The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040.

☐ Arrears of \$_____ subject to modification until _____, and arrears of \$_____ reduced to judgment.

☐ Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.

☐

\$ 323.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

☐ Good cause to stay income withholding is based on:_____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.

☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

☒ Health insurance coverage for the minor child(ren) herein:

☒ Respondent to provide: ☐ Petitioner to provide: ☐ Both Parties to provide:

☐ if available through employer. ☒ shall provide per court order.

☒ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING

☒ MODIFICATION OF PRIOR ORDER:

☒ Modification effective: 12/01/19.

☒ This order modifies a previously existing, previously controlling support order. By this modification, this tribunal assumes or retains continuing, exclusive jurisdiction of the child support obligation for the child(ren) and parties identified in this order. Modification is proper for the following reason(s):

☒ The previously controlling order is from Clark County, Nevada, dated April 23, 2018, #D-07-374223-P.

☒ An individual party, Kori L.Cage, has requested modification of the previously controlling Nevada support order.

☐ An individual party, _____, has requested modification; this tribunal has personal jurisdiction over the non-movant and the issuing state (the state whose order controlled prior to this modification) is no longer the residence of any individual party/contestant or child(ren).

☐ An individual party, _____, has requested modification; all individual parties and children now reside in Nevada.

☐ All parties have filed written consent with the tribunal whose order controlled prior to this modification for this tribunal to modify the support obligation and assume continuing, exclusive jurisdiction.

☐ SUSPENSION OF LICENSES:

PAYMENTS

1 All mailed payments **MUST** be made in the form of a cashier's check, money order or business check **ONLY**, made
 2 payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are
 also accepted. Fees may apply.

3 **Payments can be mailed to:**

State Collection and Disbursement Unit (SCaDU)
 P.O. Box 98950
 Las Vegas, Nevada 89193-8950

6 **Payments can be made in person at:**

State Collection and Disbursement Unit (SCaDU)
 1900 East Flamingo Road
 Las Vegas, Nevada 89119-5168

8 Additionally, the following information must be included with each payment: name (first, middle, last) of person
 9 responsible for paying child support, social security number of person responsible for paying child support, child
 support case number, and name of petitioner (first and last name of person receiving child support).

10 **NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.**

11 **NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.**

12 **NOTICE:** Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant
 13 to NRS 99.040. If the Respondent pays support through income withholding and the full obligation is not met by the amount
 withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the
 14 amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be
 subject to assessment of interest. The Respondent may avoid these additional costs by making current support payments each
 15 month. If another state takes jurisdiction and obtains a new order, Nevada interest will only be calculated to the date of the
 new order and will be enforced.

16 **NOTICE:** Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and
 Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the
 17 support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this
 purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

18 **NOTICE:** Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's
 19 Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final
 Order/Judgment being ordered by District Court.

20 **NOTICE:** Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written
 Notice of Entry of Judgment.

21 **NOTICE:** Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address,
 22 change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10)
 days of such change.

23 **NOTICE:** If you want to adjust the amount of child support established in this order, you **MUST** file a motion to modify the
 24 order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the
 child support obligation established in this order will continue until such time as all children who are the subject of this order
 25 reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18
 years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties
 26 agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the
 date the motion was filed.

27 Respondent to bring new financial statement and proof of income next date.

28 This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

Last payment 3/02/20 UIB. Respondent's Unemployment Insurance Benefits may end 9/2020. Respondent testified he is diligently looking for work. He is to provide copies of Medicaid cards he has for childrent to DAFS caseworker within 30 days to then be forwarded to Petitioner. Respondent's request to retroactively modify support beyond the filing date of the motion is hereby DENIED. NRS.125B.3828 Petitioner's request for attorney fees is hereby DENIED. Respondent had a legal to file a motion to reduce. Respondent's request for further consideration of a reduction in support, such as this court consider the income of Petitioner, is DENIED. Respondent's request to reduce support has been GRANTED. Petitioner has sporadic income per her attorney.

NEXT HEARING DATE IS September 25, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: MARCH 13, 2020



MASTER

USJR DISPOSITIONS

- ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
☐ - Involuntary (Statutory) Dismissal
☐ - Dismissed / Want of Prosecution
☐ - Transferred to Another Jurisdiction
☐ - Other Manner of Dispo
☐ - Close Case

Respondent/Respondent's Attorney
Receipt of this document is
acknowledged by my signature.

ORDER/JUDGMENT

☐ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this _____ day of _____, 20____.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20____ and this matter is remanded to Child Support Court on _____, 20____ at _____ M.

District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

1 By: V. Monet Arde
2 DEPUTY DISTRICT ATTORNEY
3 FAMILY SUPPORT DIVISION
4 1900 East Flamingo Road, Suite 100
5 Las Vegas, Nevada 89119-5168
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**DISTRICT COURT
CLARK COUNTY, NEVADA

Malika Coppedge, Petitioner(s).
vs.
Kori L Cage, Respondent(s).

Case No.: 06R136990
Child Support

NOTICE OF HEARING

Please be advised that the Motion for Review and Adjustment in the above-entitled matter is set for hearing as follows:

Date: July 06, 2020
Time: 10:00 AM
Location: Greystone Courtroom #1
Family Courts and Services Center
1900 E Flamingo Rd
Las Vegas, NV 89119

NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ A Simon
Deputy Clerk of the Court

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules 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.

By: /s/ A Simon
Deputy Clerk of the Court



1 NOH
2 Steven B. Wolfson, District Attorney
3 Nevada Bar No. 001565
4 Family Support Division
5 1900 East Flamingo Road, Suite 100
6 Las Vegas, Nevada 89119-5168
7 (702) 671-9200 - TTY and/or other relay services: 711
8 437763100A

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

12 NEVADA DEPT OF HEALTH & HUMAN)
13 SERVICES, DIV. OF WELFARE &)
14 SUPPORTIVE SERVICES, AND) Case no. 06R136990
15 (MALIKA COPPEDGE))
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1 10 AM PT (Pacific Time) in Court Room 1 of the Child Support Center of Southern
2 Nevada, **1900 East Flamingo Road Suite 100, Las Vegas, Nevada 89119**, for review
3 pursuant to NAC 425, NRS 31A, NRS 125B, NRS 126, NRS 130 and/or NRS 425.
4

5 ☐ **This is an Initial Hearing** pursuant to the Notice and Finding of Financial
6 Responsibility to Establish an Obligation or Determine Paternity. The purpose for
7 this Hearing is to address:

8 ☐ The Respondent's/Petitioner's/DAFS' request regarding: _____
9

10 ☐ **This is not an Initial Hearing.** The purpose of this hearing is to address:

11 ☐ The Respondent's/Petitioner's/DAFS' request regarding: _____

12 ☐ The Respondent's Continuing Order to Show Cause for Respondent to answer
13 why (s)he is not complying with the Court's order. The Court is asked to make a
14 determination of appropriate sanctions, including jail time, pursuant to chapter 22
15 of NRS.

16 ☐ The Respondent's Request to Quash Bench Warrant.

17 ☐ The Respondent's/Petitioner's Request to address:

18 ☐ arrears ☐ the whereabouts of the minor child(ren) from
19 (month/year) _____ through _____ (month/year). See attached proof/receipts, if
20 any.
21

22 ☐ Other: _____

23 ☒ **This is a Modification Hearing** pursuant to the Notice of Motion to Modify
24 or Notice and Finding filed contemporaneously with this Notice of Hearing.
25

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1 The request for this hearing, if any, is attached hereto and by this reference made a
2 part hereof.

3 If you do not participate by telephone, the hearing will proceed in your absence,
4 and an Order and Judgment may be entered against you. You should provide any records
5 to DAFS that you believe are relevant to your case prior to the hearing (such as paycheck
6 stubs, other proof of income, information regarding the cost of dependent health
7 insurance coverage, court orders or birth certificates of other children you are legally
8 responsible to support, proof of prior direct payments).

9 Dated this June 3, 2020

10 Respectfully Submitted,

11
12 /s/P. Morgan
13 Employee, District Attorney's Office
14 Family Support Division
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Steven B. Wolfson, District Attorney
Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TTY and/or other relay services: 711

TELEPHONIC HEARING INSTRUCTIONS

Due to COVID-19 and Governor Sisolak's social distancing mandate, all court hearings will be conducted by telephone. Please do not appear in person as you will not be permitted to enter the building.

The Court will call you at your scheduled court date and time. Occasionally, the Court may be delayed and call after your scheduled court time. If you do not answer your phone when the Court calls, the proceeding may still go forward. Please arrange to be on a land line if possible, as the Court does not usually allow the use of cellular phones during telephonic hearings.

Before your hearing, our case manager will call you to verify your number for the Court. It is your responsibility to keep our office updated as to any change in your address or telephone number. Failure to take part in your hearing may result in the Court going forward and entering an order without you.

If you intend to offer exhibits during the telephonic hearing, they must be provided to this office at least 10 days before the scheduled hearing. You may fax them to (702) 366-2410. You must print your name, docket "R" number, and UPI case number on any exhibits, and direct them to the attention of your assigned case manager.

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1 CERT

Case no. 06R136990

2 CERTIFICATE OF MAILING

3 The NOTICE OF TELEPHONIC HEARING was served upon KORI
4 LOVETT CAGE by mailing a copy thereof, first class mail, postage prepaid to:

5
6 KORI LOVETT CAGE
7 8655 ROWLAND BLUFF AVE
8 LAS VEGAS, NV 89178
9

10 on June 3, 2020.

11
12 /s/P. Morgan
13 Employee, District Attorney's Office
14 Family Support Division
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Steven B. Wolfson, District Attorney, Nevada Bar #001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 – TTY and/or other relay services: 711

CTMAIL

1 CERT

Case no. 06R136990

2 CERTIFICATE OF MAILING

3 The NOTICE OF TELEPHONIC HEARING was served upon MALIKA
4 COPPEDGE by mailing a copy thereof, first class mail, postage prepaid to:

5
6 MALIKA COPPEDGE
7 5961 TUNBRIDGE AVE
8 LAS VEGAS, NV 89139
9

10 on June 3, 2020.

11
12 /s/P. Morgan
13 Employee, District Attorney's Office
14 Family Support Division
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Steven B. Wolfson, District Attorney, Nevada Bar #001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 – TTY and/or other relay services: 711

CTMAIL



1 **NOTC**

2 **GHANDI DEETER BLACKHAM**

3 Brian E. Blackham, Esq.

Nevada Bar No. 9974

4 Email: brian@ghandilaw.com

Leah Blakesley, Esq.

5 Nevada Bar No. 12802

Email: leah@ghandilaw.com

6 725 S. 8th Street, Suite 100

Las Vegas, Nevada 89101

7 Telephone: (702) 878-1115

Facsimile: (702) 979-2485

Attorneys for Malika Coppedge

8 **EIGHTH JUDICIAL DISTRICT COURT**

9 **FAMILY DIVISION**

10 **CLARK COUNTY, NEVADA**

11 Nevada Dept Of Health & Human
12 Services, Div. Of Welfare & Supportive
Services, and (Malika Coppedge),

13 Petitioner,

14 vs.

15 Kori L. Cage,

16 Respondent.

Case No.: 06R136990

Dept. No.: CHILD SUPPORT

Date of Hearing: July 6, 2020

Time of Hearing: 10:00 a.m.

17 **NOTICE OF INTENT TO APPEAR BY COMMUNICATION EQUIPMENT**

18 Petitioner Malika Coppedge ("Malika" or "Petitioner"), by and through her
19 attorneys, Brian E. Blackham, Esq. and Leah Blakesley, Esq., of GHANDI
20 DEETER BLACKHAM, pursuant to the Order Adopting Part IX of The Supreme

1 Court Rules filed December 18, 2008, and hereby submits a Notice of Intent to
2 Appear by Communication Equipment for the Modification Hearing currently
3 scheduled for the 6th day of July 2020 at 10:00 a.m. Pacific Time.

4 For the purposes of this appearance Petitioner and her Counsel can be
5 reached at the following telephone numbers: Leah Blakesley, Esq.: 702-878-1115;
6 Malika Coppedge: 503-975-9656. Petitioner and her Counsel understand that it is
7 their responsibility to ensure that they can be reached at these telephone numbers on
8 the date and time of the hearing.

9 They also understand that due to the unpredictable nature of Court
10 proceedings, the hearing may be called at a time other than the scheduled time.
11 Further, they understand that their failure to be available at the above stated
12 telephone number will constitute a nonappearance.

13 DATED this 25th day of June 2020.

14 **GHANDI DEETER BLACKHAM**

15
16 /s/ Leah Blakesley
17 Leah Blakesley, Esq.
18 Nevada Bar No. 12502
19 725 S. 8th Street, Suite 100
20 Las Vegas, Nevada 89101
Attorney for Malika Coppedge

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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of June 2020 I did serve a true and correct copy of the foregoing NOTICE OF INTENT TO APPEAR BY COMMUNICATION EQUIPMENT to the following individual and by the following means:

- ☒ Electronic Service to:

Public by DAFS
E-Service: DAFSLegalGroup@clarkcountyda.com
- ☐ Via Facsimile to:
- ☐ Via Email to:
- ☒ Placing in the U.S. Mail, with postage fully prepaid, addressed to:

Steven B. Wolfson, DA	Kori Cage
Family Support Division	8655 Rowland Bluff Ave.
1900 E. Flamingo Road	Las Vegas, NV 89178
Suite 100	Respondent
Las Vegas, NV 89119	

/s/ Theresa Calabrese-Vance
An employee of Ghandi Deeter Blackham



NEMR
Steven B. Wolfson, District Attorney
Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TTY and/or other relay services: 711
437763100A

DISTRICT COURT
CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human Services,)
Div. Of Welfare & Supportive Services,)
(Malika Coppedge),)
Petitioner,)
vs.)
Kori L Cage,)
Respondent.)

Case no. 06R136990
Dept. no. CHILD SUPPORT

NOTICE OF ENTRY OF MASTER'S RECOMMENDATIONS

To: Kori L Cage, Respondent or Respondent's Attorney

To: Malika Coppedge, Petitioner or Petitioner's Attorney

Please take notice that the enclosed Master's Recommendations were entered in the above-entitled matter on July 06, 2020.

1 CERT

Case no. 06R136990

2 CERTIFICATE OF MAILING

3 The foregoing Notice of Entry of Master's Recommendations for the Master's
4 Recommendation entered on July 06, 2020, was served upon Kori Lovett Cage by mailing a copy
5 thereof, first class mail, postage prepaid to:

6 Kori Lovett Cage
7 8655 Rowland Bluff Ave
8 Las Vegas NV 89178

9 on July 6, 2020.

10

11 Employee, District Attorney's Office
12 Family Support Division

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1 CERT

Case no. 06R136990

2 CERTIFICATE OF MAILING

3 The foregoing Notice of Entry of Master's Recommendations for the Master's
4 Recommendation entered on July 06, 2020, was served upon Malika Coppedge by mailing a copy
5 thereof, first class mail, postage prepaid to:

6 Malika Coppedge
7 5961 Tunbridge Ave
8 Las Vegas NV 89139

8

9 on July 6, 2020.

10

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/s/D Battles
Employee, District Attorney's Office
Family Support Division

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NEMREC

1 MRAO
2 STEVEN B. WOLFSON
3 DISTRICT ATTORNEY
4 Nevada Bar No. 001565
5 FAMILY SUPPORT DIVISION
6 1900 East Flamingo Road, Suite 100
7 Las Vegas, Nevada 89119-5168
8 (702) 671-9200
9 TTY and/or other relay services: 711
10 437763100A

District Court
CLARK COUNTY, NEVADA

11 NEVADA DEPT OF HEALTH & HUMAN)
12 SERVICES, DIV. OF WELFARE & SUPPORTIVE)
13 SERVICES, AND (MALIKA COPPEDGE),)

Petitioner,)

14 vs.)

15 KORIL CAGE,)

16 Respondent.)

Case No. 06R136990

Department No. CHILD SUPPORT

MASTER'S RECOMMENDATION

17 This matter having been heard on **JULY 06, 2020** before the undersigned Hearing Master, having considered all the evidence
18 and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

19 Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

20 ☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

21 ☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

22 Basis for adjustment from state formula: _____

23 Respondent is to pay current support for the child(ren), **Kyree Cage, Jayla Nicole Cage.**

CHILD SUPPORT

24 Respondent is to pay monthly:

25 \$323.00 Temp child support

26 _____ medical support

27 _____ spousal support

28 _____ arrears payment

☐ ARREARAGES ☒ ARREARAGES NOT ADDRESSED AT THIS HEARING

\$ 323.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren)
reach majority, become emancipated or further order of the Court.

Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

☐ Good cause to stay income withholding is based on: _____. Said withholding shall be postponed until Respondent
becomes delinquent in an amount equal to 30 days support.

☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____, is hereby
confirmed and is the controlling order for the following reasons: ☐ only order _____.

☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this
noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

☒ Health insurance coverage for the minor child(ren) herein:

☒ Respondent to provide: ☐ Petitioner to provide: ☐ Both Parties to provide:

☐ if available through employer. ☒ shall provide per court order.

☒ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division
within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

- 1 ☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING
 2 ☐ MODIFICATION OF PRIOR ORDER:
 3 ☐ SUSPENSION OF LICENSES:

PAYMENTS

4 All mailed payments **MUST** be made in the form of a cashier's check, money order or business check **ONLY**, made
 5 payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are
 6 also accepted. Fees may apply.

Payments can be mailed to:

7 State Collection and Disbursement Unit (SCaDU)
 8 P.O. Box 98950
 Las Vegas, Nevada 89193-8950

Payments can be made in person at:

9 State Collection and Disbursement Unit (SCaDU)
 10 1900 East Flamingo Road
 11 Las Vegas, Nevada 89119-5168

12 Additionally, the following information must be included with each payment: name (first, middle, last) of person
 13 responsible for paying child support, social security number of person responsible for paying child support, child
 support case number, and name of petitioner (first and last name of person receiving child support).

14 **NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.**

15 **NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.**

16 **NOTICE:** Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant
 17 to NRS 99.040. If the Respondent pays support through income withholding and the full obligation is not met by the amount
 18 withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the
 amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be
 subject to assessment of interest. The Respondent may avoid these additional costs by making current support payments each
 month. If another state takes jurisdiction and obtains a new order, Nevada interest will only be calculated to the date of the
 new order and will be enforced.

19 **NOTICE:** Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and
 20 Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the
 support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this
 purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

22 **NOTICE:** Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's
 Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final
 Order/Judgment being ordered by District Court.

23 **NOTICE:** Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written
 24 Notice of Entry of Judgment.

25 **NOTICE:** Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address,
 26 change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10)
 days of such change.

27 **NOTICE:** If you want to adjust the amount of child support established in this order, you **MUST** file a motion to modify the
 28 order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the
 child support obligation established in this order will continue until such time as all children who are the subject of this order

reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18 years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the date the motion was filed.

Respondent to bring new financial statement and proof of income next date.

This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

There is no decision yet on the objection that was filed by the Respondent. The Court is not making any changes to current Orders. The Respondent has not provided the Medicaid cards as ordered at the last hearing and continues to inform this Court he should not be ordered to provide those to Petitioner. The Court directs that the Order in effect remains the Order unless/until there is an Objection that modifies or nullifies the Order. He is given an additional 10 days to comply with the March 13, 2020 Order.

NEXT HEARING DATE IS September 25, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: JULY 06, 2020

MASTER

USJR DISPOSITIONS

- ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
☐ - Involuntary (Statutory) Dismissal
☐ - Dismissed / Want of Prosecution
☐ - Transferred to Another Jurisdiction
☐ - Other Manner of Dispo
☐ - Close Case

Respondent/Respondent's Attorney
 Receipt of this document is
 acknowledged by my signature.

ORDER/JUDGMENT

☐ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this _____ day of _____, 20____.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20____ and this matter is remanded to Child Support Court on _____, 20____ at _____ M.

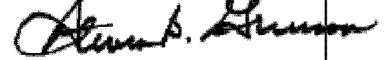
District Court Judge, Family Division

1 **STEVEN B. WOLFSON, Clark County District Attorney**
2 Nevada Bar No. 001565

3 By: 
4 **DEPUTY DISTRICT ATTORNEY**
5 **FAMILY SUPPORT DIVISION**
6 **1900 East Flamingo Road, Suite 100**
7 **Las Vegas, Nevada 89119-5168**

1 MRAO
2 STEVEN B. WOLFSON
3 DISTRICT ATTORNEY
4 Nevada Bar No. 001565
5 FAMILY SUPPORT DIVISION
6 1900 East Flamingo Road, Suite 100
7 Las Vegas, Nevada 89119-5168
8 (702) 671-9200
9 TTY and/or other relay services: 711
10 437763100A

Electronically Filed
7/10/2020 11:34 AM
Steven D. Grierson
CLERK OF THE COURT



District Court
CLARK COUNTY, NEVADA

NEVADA DEPT OF HEALTH & HUMAN)
SERVICES, DIV. OF WELFARE & SUPPORTIVE)
SERVICES, AND (MALIKA COPPEDGE),)

Petitioner,)

Case No. **06R136990**

vs.)

Department No. **CHILD SUPPORT**

KORI L CAGE,)

Respondent.)

MASTER'S RECOMMENDATION

This matter having been heard on **MARCH 13, 2020 (Attorney Blakesley, #12802)** before the undersigned Hearing Master, having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

Basis for deviation from state formula: 2 Additional children: Kamryn and Londyn.

Respondent is to pay current support for the child(ren), Kyree Cage, AND Jayla Nicole Cage.

CHILD SUPPORT

Respondent is to pay monthly:

\$323.00 Temp child support

medical support

spousal support

\$0.00 Temp arrears payment

☒ ARREARAGES ☐ ARREARAGES NOT ADDRESSED IN THIS ORDER

Arrears/Obligation period is 06/01/17 through 01/31/20.

Arrears, interest and penalty calculated through 1/31/20 by audit. For accounting purposes, the next payment is due 2/01/2020.

child support arrearage of \$1,574.48 plus interest of \$728.38 penalty of \$426.32

medical support arrearage of _____ plus interest of _____ penalty of _____

spousal support arrearage of _____ plus interest of _____

medical expense arrearage of _____

genetic test costs of _____

total arrearages of \$1,574.48 total interest \$ 728.38 total penalty \$ 426.32

GRAND TOTAL (arrearages + interest + penalty) = **\$2,729.18**

FINDING 1.5

☐ The total arrears are hereby confirmed.

☒ The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040.

☐ Arrears of \$_____ subject to modification until _____, and arrears of \$_____ reduced to judgment.

☐ Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.

☐

\$ 323.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

☐ Good cause to stay income withholding is based on:_____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.

☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

☒ Health insurance coverage for the minor child(ren) herein:

☒ Respondent to provide: ☐ Petitioner to provide: ☐ Both Parties to provide:

☐ if available through employer. ☒ shall provide per court order.

☒ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING

☒ MODIFICATION OF PRIOR ORDER:

☒ Modification effective: 12/01/19.

☒ This order modifies a previously existing, previously controlling support order. By this modification, this tribunal assumes or retains continuing, exclusive jurisdiction of the child support obligation for the child(ren) and parties identified in this order. Modification is proper for the following reason(s):

☒ The previously controlling order is from Clark County, Nevada, dated April 23, 2018, #D-07-374223-P.

☒ An individual party, Kori L Cage, has requested modification of the previously controlling Nevada support order.

☐ An individual party, _____, has requested modification; this tribunal has personal jurisdiction over the non-movant and the issuing state (the state whose order controlled prior to this modification) is no longer the residence of any individual party/contestant or child(ren).

☐ An individual party, _____, has requested modification; all individual parties and children now reside in Nevada.

☐ All parties have filed written consent with the tribunal whose order controlled prior to this modification for this tribunal to modify the support obligation and assume continuing, exclusive jurisdiction.

☐ SUSPENSION OF LICENSES:

PAYMENTS

1 All mailed payments **MUST** be made in the form of a cashier's check, money order or business check **ONLY**, made
 2 payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are
 also accepted. Fees may apply.

3 **Payments can be mailed to:**

State Collection and Disbursement Unit (SCaDU)
 P.O. Box 98950
 Las Vegas, Nevada 89193-8950

6 **Payments can be made in person at:**

State Collection and Disbursement Unit (SCaDU)
 1900 East Flamingo Road
 Las Vegas, Nevada 89119-5168

8 Additionally, the following information must be included with each payment: name (first, middle, last) of person
 9 responsible for paying child support, social security number of person responsible for paying child support, child
 support case number, and name of petitioner (first and last name of person receiving child support).

10 **NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.**

11 **NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.**

12 **NOTICE:** Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant
 13 to NRS 99.040. If the Respondent pays support through income withholding and the full obligation is not met by the amount
 withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the
 14 amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be
 subject to assessment of interest. The Respondent may avoid these additional costs by making current support payments each
 15 month. If another state takes jurisdiction and obtains a new order, Nevada interest will only be calculated to the date of the
 new order and will be enforced.

16 **NOTICE:** Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and
 Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the
 17 support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this
 purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

18 **NOTICE:** Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's
 19 Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final
 Order/Judgment being ordered by District Court.

20 **NOTICE:** Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written
 Notice of Entry of Judgment.

21 **NOTICE:** Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address,
 22 change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10)
 days of such change.

23 **NOTICE:** If you want to adjust the amount of child support established in this order, you **MUST** file a motion to modify the
 24 order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the
 child support obligation established in this order will continue until such time as all children who are the subject of this order
 25 reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18
 years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties
 26 agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the
 date the motion was filed.

27 Respondent to bring new financial statement and proof of income next date.

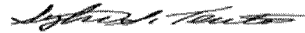
28 This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

Last payment 3/02/20 UIB. Respondent's Unemployment Insurance Benefits may end 9/2020. Respondent testified he is diligently looking for work. He is to provide copies of Medicaid cards he has for childrent to DAFS caseworker within 30 days to then be forwarded to Petitioner. Respondent's request to retroactively modify support beyond the filing date of the motion is hereby DENIED. NRS.125B.3828 Petitioner's request for attorney fees is hereby DENIED. Respondent had a legal to file a motion to reduce. Respondent's request for further consideration of a reduction in support, such as this court consider the income of Petitioner, is DENIED. Respondent's request to reduce support has been GRANTED. Petitioner has sporadic income per her attorney.

NEXT HEARING DATE IS September 25, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: MARCH 13, 2020



MASTER

USJR DISPOSITIONS

- ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
☐ - Involuntary (Statutory) Dismissal
☐ - Dismissed / Want of Prosecution
☐ - Transferred to Another Jurisdiction
☐ - Other Manner of Dispo
☐ - Close Case

Respondent/Respondent's Attorney
Receipt of this document is
acknowledged by my signature.

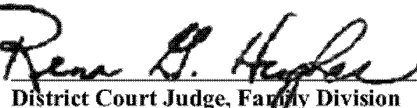
ORDER/JUDGMENT

☐ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☒ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☒ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this 8th day of July, 20 20.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20____ and this matter is remanded to Child Support Court on _____, 20____ at _____ M.



District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

1 By: V. Monet Arde
2 DEPUTY DISTRICT ATTORNEY
3 FAMILY SUPPORT DIVISION
4 1900 East Flamingo Road, Suite 100
5 Las Vegas, Nevada 89119-5168
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Alvin B. Hanson

Nevada Dept Of Health & Human Services,
Div. Of Welfare & Supportive Services,
(Malika Coppedge),
vs.
Kori L Cage,

MRAO
STEVEN B. WOLFSON
DISTRICT ATTORNEY
Nevada Bar No. 001565
FAMILY SUPPORT DIVISION
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200
TTY and/or other relay services: 711
437763100A

Electronically Filed
7/10/2020 11:34 AM
Steven D. Grlerson
CLERK OF THE COURT



District Court
CLARK COUNTY, NEVADA

NEVADA DEPT OF HEALTH & HUMAN)
SERVICES, DIV. OF WELFARE & SUPPORTIVE)
SERVICES, AND (MALIKA COPPEDGE),)

Petitioner,)

Case No. 06R136990

vs.)

Department No. CHILD SUPPORT

KORI L CAGE,)

Respondent.)

MASTER'S RECOMMENDATION

This matter having been heard on **MARCH 13, 2020 (Attorney Blakesley, #12802)** before the undersigned Hearing Master, having considered all the evidence and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

Basis for deviation from state formula: 2 Additional children: Kamryn and Londyn.

Respondent is to pay current support for the child(ren), Kyree Cage, AND Jayla Nicole Cage.

CHILD SUPPORT

Respondent is to pay monthly:

\$323.00 Temp child support

medical support

spousal support

\$0.00 Temp arrears payment

☒ ARREARAGES ☐ ARREARAGES NOT ADDRESSED IN THIS ORDER

Arrears/Obligation period is 06/01/17 through 01/31/20.

Arrears, interest and penalty calculated through 1/31/20 by audit. For accounting purposes, the next payment is due 2/01/2020.

child support arrearage of \$1,574.48 plus interest of \$728.38 penalty of \$426.32

medical support arrearage of _____ plus interest of _____ penalty of _____

spousal support arrearage of _____ plus interest of _____

medical expense arrearage of _____

genetic test costs of _____

total arrearages of \$1,574.48 total interest \$ 728.38 total penalty \$ 426.32

GRAND TOTAL (arrearages + interest + penalty) = \$2,729.18

☐ The total arrears are hereby confirmed.

☒ The total arrears, interest and penalties are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number. Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040.

☐ Arrears of \$_____ subject to modification until _____, and arrears of \$_____ reduced to judgment.

☐ Arrears listed above are reduced to judgment. This supersedes prior Nevada judgments, if any, awarded under this case number.

☐

\$ 323.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren) reach majority, become emancipated or further order of the Court.

Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

☐ Good cause to stay income withholding is based on:_____. Said withholding shall be postponed until Respondent becomes delinquent in an amount equal to 30 days support.

☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, #_____, is hereby confirmed and is the controlling order for the following reasons: ☐ only order _____.

☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

☒ Health insurance coverage for the minor child(ren) herein:

☒ Respondent to provide: ☐ Petitioner to provide: ☐ Both Parties to provide:

☐ if available through employer. ☒ shall provide per court order.

☒ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING

☒ MODIFICATION OF PRIOR ORDER:

☒ Modification effective: 12/01/19.

☒ This order modifies a previously existing, previously controlling support order. By this modification, this tribunal assumes or retains continuing, exclusive jurisdiction of the child support obligation for the child(ren) and parties identified in this order. Modification is proper for the following reason(s):

☒ The previously controlling order is from Clark County, Nevada, dated April 23, 2018, #D-07-374223-P.

☒ An individual party, Kori L Cage, has requested modification of the previously controlling Nevada support order.

☐ An individual party, _____, has requested modification; this tribunal has personal jurisdiction over the non-movant and the issuing state (the state whose order controlled prior to this modification) is no longer the residence of any individual party/contestant or child(ren).

☐ An individual party, _____, has requested modification; all individual parties and children now reside in Nevada.

☐ All parties have filed written consent with the tribunal whose order controlled prior to this modification for this tribunal to modify the support obligation and assume continuing, exclusive jurisdiction.

☐ SUSPENSION OF LICENSES:

PAYMENTS

1 All mailed payments **MUST** be made in the form of a cashier's check, money order or business check **ONLY**, made
2 payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are
also accepted. Fees may apply.

3 **Payments can be mailed to:**

State Collection and Disbursement Unit (SCaDU)
P.O. Box 98950
Las Vegas, Nevada 89193-8950

6 **Payments can be made in person at:**

State Collection and Disbursement Unit (SCaDU)
1900 East Flamingo Road
Las Vegas, Nevada 89119-5168

8 Additionally, the following information must be included with each payment: name (first, middle, last) of person
9 responsible for paying child support, social security number of person responsible for paying child support, child
support case number, and name of petitioner (first and last name of person receiving child support).

10 **NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.**

11 **NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.**

12 **NOTICE:** Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant
13 to NRS 99.040. If the Respondent pays support through income withholding and the full obligation is not met by the amount
withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the
14 amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be
subject to assessment of interest. The Respondent may avoid these additional costs by making current support payments each
15 month. If another state takes jurisdiction and obtains a new order, Nevada interest will only be calculated to the date of the
new order and will be enforced.

16 **NOTICE:** Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and
Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the
17 support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this
purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

18 **NOTICE:** Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's
19 Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final
Order/Judgment being ordered by District Court.

20 **NOTICE:** Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written
Notice of Entry of Judgment.

21 **NOTICE:** Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address,
22 change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10)
days of such change.

23 **NOTICE:** If you want to adjust the amount of child support established in this order, you **MUST** file a motion to modify the
24 order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the
child support obligation established in this order will continue until such time as all children who are the subject of this order
25 reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18
years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties
agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the
26 date the motion was filed.

27 Respondent to bring new financial statement and proof of income next date.

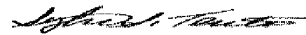
28 This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

Last payment 3/02/20 UIB. Respondent's Unemployment Insurance Benefits may end 9/2020. Respondent testified he is diligently looking for work. He is to provide copies of Medicaid cards he has for children to DAFS caseworker within 30 days to then be forwarded to Petitioner. Respondent's request to retroactively modify support beyond the filing date of the motion is hereby DENIED. NRS.125B.3828 Petitioner's request for attorney fees is hereby DENIED. Respondent had a legal to file a motion to reduce. Respondent's request for further consideration of a reduction in support, such as this court consider the income of Petitioner, is DENIED. Respondent's request to reduce support has been GRANTED. Petitioner has sporadic income per her attorney.

NEXT HEARING DATE IS September 25, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: MARCH 13, 2020



MASTER

USJR DISPOSITIONS

- ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
☐ - Involuntary (Statutory) Dismissal
☐ - Dismissed / Want of Prosecution
☐ - Transferred to Another Jurisdiction
☐ - Other Manner of Dispo
☐ - Close Case

Respondent/Respondent's Attorney
Receipt of this document is
acknowledged by my signature.

ORDER/JUDGMENT

☐ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☒ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☒ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this 8th day of July, 20 20.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20____ and this matter is remanded to Child Support Court on _____, 20____ at _____, M.



District Court Judge, Family Division

STEVEN B. WOLFSON, Clark County District Attorney
Nevada Bar No. 001565

Steven B. Wolfson, District Attorney, Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road #100
Las Vegas, Nevada 89119-5168

(762) 671-9209 - TTY and/or other relay services: 711

1 By: V. Monet Arde
2 DEPUTY DISTRICT ATTORNEY
3 FAMILY SUPPORT DIVISION
4 1900 East Flamingo Road, Suite 100
5 Las Vegas, Nevada 89119-5168
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1 NOH
2 Steven B. Wolfson, District Attorney
3 Nevada Bar No. 001565
4 Family Support Division
5 1900 East Flamingo Road, Suite 100
6 Las Vegas, Nevada 89119-5168
7 (702) 671-9200 - TTY and/or other relay services: 711
8 437763100A

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

11 NEVADA DEPT OF HEALTH & HUMAN)
12 SERVICES, DIV. OF WELFARE &)
13 SUPPORTIVE SERVICES, AND) Case no. 06R136990
14 (MALIKA COPPEDGE))
15)
16) Petitioner,)
17) Dept. no. CHILD SUPPORT
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19 **Due to COVID-19 and Governor Sisolak's social distancing mandate, all court**
20 **hearings will be conducted telephonically. Please do not appear in person, the**
21 **Court will contact you by phone. The court will use best efforts to contact you at**
22 **your scheduled hearing time, please be patient as delays may occur. Instructions on**
23 **how to participate by telephone are attached.**

24 **NOTICE OF TELEPHONIC HEARING**

25 To: KORI LOVETT CAGE, Respondent
26 To: MALIKA COPPEDGE, Petitioner
27
28

Steven B. Wolfson, District Attorney
Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TTY and/or other relay services: 711

1 Notice is hereby given that the undersigned will bring the above-entitled matter
2 before the Child Support Hearing Master on the 22nd day of September, 2020 at the
3 hour of 9:30 AM PT (Pacific Time) in Court Room 1 of the Child Support Center of
4 Southern Nevada, **1900 East Flamingo Road Suite 100, Las Vegas, Nevada 89119**, for
5 review pursuant to NAC 425, NRS 31A, NRS 125B, NRS 126, NRS 130 and/or NRS
6 425.

7 The previously scheduled court date of September 25, 2020 at 9:00 AM has been
8 vacated and rescheduled to the above date and location. This matter is continued to avoid
9 a scheduling conflict.

10 ☐ **This is an Initial Hearing** pursuant to the Notice and Finding of Financial
11 Responsibility to Establish an Obligation or Determine Paternity. The purpose for
12 this Hearing is to address:

13 ☐ The Respondent's/Petitioner's/DAFS' request regarding: _____

14 ☐ **This is not an Initial Hearing.** The purpose of this hearing is to address:

15 ☐ The Respondent's/Petitioner's/DAFS' request regarding: _____

16 ☐ The Respondent's Continuing Order to Show Cause for Respondent to answer
17 why (s)he is not complying with the Court's order. The Court is asked to make a
18 determination of appropriate sanctions, including jail time, pursuant to chapter 22
19 of NRS.

20 ☐ The Respondent's Request to Quash Bench Warrant.

21 ☐ The Respondent's/Petitioner's Request to address:

22 ☐ arrears ☐ the whereabouts of the minor child(ren) from
23 (month/year) _____ through _____ (month/year). See attached proof/receipts, if
24 any.

25 ☐ Other: _____

☒ **This is a Modification Hearing** pursuant to the Notice of Motion to Modify or Notice and Finding filed contemporaneously with this Notice of Hearing.

The request for this hearing, if any, is attached hereto and by this reference made a part hereof.

If you do not participate by telephone, the hearing will proceed in your absence, and an Order and Judgment may be entered against you. You should provide any records to DAFS that you believe are relevant to your case prior to the hearing (such as paycheck stubs, other proof of income, information regarding the cost of dependent health insurance coverage, court orders or birth certificates of other children you are legally responsible to support, proof of prior direct payments).

Dated this July 15, 2020

Respectfully Submitted,

/s/D. Kelly
Employee, District Attorney's Office
Family Support Division

Steven B. Wolfson, District Attorney
Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TTY and/or other relay services: 711

TELEPHONIC HEARING INSTRUCTIONS

Due to COVID-19 and Governor Sisolak's social distancing mandate, all court hearings will be conducted by telephone. Please do not appear in person, the Court will contact you by phone. The court will use best efforts to contact you at your scheduled hearing time, please be patient as delays may occur.

The Court will call you at your scheduled court date and time. Occasionally, the Court may be delayed and call after your scheduled court time. If you do not answer your phone when the Court calls, the proceeding may still go forward. Please arrange to be on a land line if possible, as the Court does not usually allow the use of cellular phones during telephonic hearings.

Before your hearing, our case manager will call you to verify your number for the Court. It is your responsibility to keep our office updated as to any change in your address or telephone number. Failure to take part in your hearing may result in the Court going forward and entering an order without you.

If you intend to offer exhibits during the telephonic hearing, they must be provided to this office at least 10 days before the scheduled hearing. You may fax them to (702) 366-2410. You must print your name, docket "R" number, and UPI case number on any exhibits, and direct them to the attention of your assigned case manager.

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Steven B. Wolfson, District Attorney
Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TTY and/or other relay services: 711

1 CERT

Case no. 06R136990

2 CERTIFICATE OF MAILING

3 The NOTICE OF TELEPHONIC HEARING was served upon KORI
4 LOVETT CAGE by mailing a copy thereof, first class mail, postage prepaid to:

5
6 KORI LOVETT CAGE
7 8655 ROWLAND BLUFF AVE
8 LAS VEGAS, NV 89178
9

10 on this 15th day of July, 2020.

11
12 /s/D. Kelly
13 Employee, District Attorney's Office
14 Family Support Division
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Steven B. Wolfson, District Attorney, Nevada Bar #001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 – TTY and/or other relay services: 711

CTMAIL

1 CERT

Case no. 06R136990

2 CERTIFICATE OF MAILING

3 The NOTICE OF TELEPHONIC HEARING was served upon MALIKA
4 COPPEDGE by mailing a copy thereof, first class mail, postage prepaid to:

5
6 MALIKA COPPEDGE
7 5961 TUNBRIDGE AVE
8 LAS VEGAS, NV 89139
9

10 on this 15th day of July, 2020.

11
12 /s/D. Kelly
13 Employee, District Attorney's Office
14 Family Support Division
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Steven B. Wolfson, District Attorney, Nevada Bar #001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 – TTY and/or other relay services: 711

CTMAIL

FILED

JUL 29 2020

John J. Blum
CLERK OF COURT

1 **OBJ/APP**

2 **KORI CAGE**

3 8655 Rowland Bluff Ave

4 Las Vegas, Nevada 89178

5 Phone: (702) 771-2506

6 kcage01@gmail.com

7 Plaintiff in Proper Person

8 **DISTRICT COURT CLARK COUNTY, NEVADA**

9 Nevada Dept. of Health & Human Services,

10 Div. of Welfare & Supportive Services, and

11 **MALIKA COPPEDGE**

12 Petitioner,

13 vs.

14 **KORI CAGE**

15 Respondent.

Case No. R136990

Dept. No. Child Support

Oral Argument Requested

NO

16 **OBJECTION AND APPEAL THE JULY 6, 2020 MASTERS**

17 **RECOMMENDATIONS**

18
19 In accordance to EDRC 1.40(e) and (f), Respondent brings forth this timely
20 Objection/ Appeal from the JULY 6, 2020 Hearing Masters Recommendations.
21 Furthermore, the Respondent is not requesting an oral argument rather a decision
22 based on the purely legal issues presented and to expedite litigation. **RECEIVED**

JUL 27 2020

CLERK OF THE COURT

1 **POINTS AND AUTHORITIES IN SUPPORT OF THE MOTION**

2
3 **BACKGROUND I**

4
5 This case is the result from the Petitioners intentional shirk of her financial
6 obligation to avoid paying her court order child support which was strategically
7 proceeded by her unsupported motion to modify her child support obligation
8 (November 17, 2016), followed by her motion for temporary primary custody
9 (May 17, 2017), then permanent primary custody (January 26, 2018). The change
10 in custody has resulted in the Respondent having to now pay child support through
11 an unlawful order written by the Petitioners retained attorney and adopted
12 wholesale by Judge Rena Hughes.

13 On September 10, 2019 Respondent was terminated from his employment
14 through no fault of his own, which is the reason for the current child support
15 modification. Respondent petitioned the District Attorney's office to modify his
16 child support obligation September 12, 2019.

17 **Legal Argument II**

18 **1. Issues**

- 19 a. Did the district court abuse its discretion by setting this July 6, 2020 sua
20 sponte hearing and setting it September 25, 2020 sua sponte hearing not in
21 accordance with NRS 125B.145?
- 22 b. Did the district court abuse its discretion by ignoring NRS 125.080(9) in
23 particular (L) the relative income of **both** parties when determining Respondents
24 child support obligation?
- 25

1 c. Did the district court abuse its discretion by ignoring the new child support
2 regulations (22% for 2 children) codified in Chapter 425 of the Nevada
3 Administrative Code?
4

5 6 **2. Appeal**

7 a. Did the district court abuse its discretion by setting this July 6, 2020 sua
8 sponte hearing and setting its September 25, 2020 sua sponte hearing not in
9 accordance with NRS 125B.145?

10 NRS 125B.145 states in relevant part 3(a) Each person who is subject to an
11 order for the support of a child is notified, not less than once every 3 years (4)
12 support of a child may be reviewed at any time on the basis of changed
13 circumstances...a change of 20 percent or more in the gross monthly
14 income...deemed to constitute changed circumstances requiring a review for
15 modification of the order for the support of a child. Held in Fernandez v.
Fernandez, 126 Nev. Adv. Op. No. 3, 51423 (2010).

16 Additionally, this is the third child support hearing within in 7 months, while
17 all evidence was set to be considered during this March 13, 2020 hearing. The
18 hearing master certainly had access to finances, insurance and any other
19 information deemed appropriate and based her decisions accordingly.

20 Further, there is no ethical or legal justification to have set the July 6, 2020
21 hearing and continue with a September 25, 2020 hearing, other than to strain the
22 judicial economy, harass the Respondent and increase litigation costs which is not
23 in the best interest of the children. The Respondent and Plaintiff have lost time,
24 money and endured the mental anguish in preparing for said baseless hearing
25 which ONLY financially benefits opposing counsel who at the time of the January
26, 2019 hearing had collected 30 thousand dollars in litigation expenses.

1. b. Did the district court abuse its discretion by ignoring NRS 125.080(9) in
2 particular (L) the relative income of both parties when determining Respondents
3 child support obligation?

4
5 Effective February 1, 2020 new regulations codified in Chapter 425 of the
6 Nevada Administrative Code replace existing rules and establish child support
7 guidelines which will apply to previous cases *only if* the case qualifies for
8 modification or adjustment. In Relevant part: *For two (2) children*, the sum of: (a)
9 Twenty-two percent (22%) of the first \$6,000 of the obligor's monthly gross
10 income. Additionally, penalties and interests have been eliminated.

11 c. Did the district court abuse its discretion by ignoring the new child support
12 regulations (22% for 2 children) codified in Chapter 425 of the Nevada
13 Administrative Code

14
15 NRS 125.080(9) The court **shall** consider the following factors when
16 adjusting the amount of support of a child upon specific findings of fact (L) The
17 relative income of both parents.
18 Chambers v. Sanderson, 107 Nev. 846 The Supreme Court held, "Among the
19 factors which the district court **must** consider, when adjusting the amount of
20 support of a child upon specific findings of fact is the relative income of both
21 parents. NRS 125B.080(9)(1). Thus, in denying Tara's discovery and a hearing on
22 the basis on which it did, the district court erred." See also Barbagallo, 105 Nev. at
23 552, 779 P.2d at 536-37 as it relates to (1) *Earning capacity and relative financial*
24 *means and (2) Standard of living*. Additionally, the district court ORDERED
25 parties to provided two years' taxes returns, **curiously the ORDERED tax**
returns as well as Defendants financial affidavit was ignored. (Emphasis
implied)

3. Objections

Respondents objects (*More prejudicial than probative*) to the ORDER of being the sole provider of health insurance as NRS 125B.020(1) specifically states it is the obligation of parents (plural) to provide health insurance while the US constitution and Article 1, § 1 and Article IV, § 21 of the Nevada Constitution forces a state to govern impartially under Equal protection and not draw distinctions between individuals solely on differences that are irrelevant to a legitimate governmental objective. Thus, the equal protection clause is crucial to the protection of civil rights. Bolling v. Sharpe, 347 U.S. 497 (1954).

Additionally, The Fourteenth Amendment of the United States Constitution permits the States a wide scope of discretion in enacting laws which affect some groups of citizens differently than others. McGowan v. Maryland, 366 U.S. *1025 420, 81 S. Ct. 1101, 6 L. Ed. 2d 393 (1961). If any state of facts may reasonably be conceived to justify it, a statutory discrimination will not be set aside. In this case, NO facts where suggested, implied or stated to warrant the unequal application of the law.

Furthermore, Respondent objects to the district courts recommendation that Respondent provide Medicaid cards to DAFS caseworker within 10 days to then be forwarded to the Petitioner due to [1] HIPAA regulations [2] Petitioners counsels' oral argument regarding Medicaid cards was not in her motion, [3] Respondent expressed confidentiality concerns in providing medical cards to the petitioner advising that he would/could provide the medical information directly to the Dr. Office as the Respondent would [4] like be abreast of all Dr. Visits and medical treatment [5] wants to protect himself and younger children from a different relationship who all share the same medical insurance, notwithstanding, the Petitioner is an Advanced Registered Nurse who independently accepts Medicaid payments and has access to medical records and a clear vendetta against

1 Respondent and his children. [6] No reasons were offered or given to arbitrarily
2 enact this prejudicial order.

3
4 DATED this 18 day of July, 2019

5
6 Pursuant to NRS 53.045, I declare under
7 penalty of perjury that the foregoing is true
8 and correct.

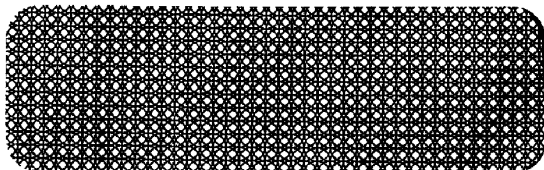
9 Kori Cage (signature)
10 KORI CAGE
11 8655 Rowland Bluff Ave
12 Las Vegas, NV 89178
13 Phone: (702) 771-2506
14 kcage01@gmail.com
15 Appellant, Pro se
16
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25

Exhibit 1

Office of the District Attorney

FAMILY SUPPORT DIVISION
1900 EAST FLAMINGO SUITE 100
LAS VEGAS NV 89119-5168

RETURN SERVICE REQUESTED



113 DROFNMP 89178



1 MRAO
2 STEVEN B. WOLFSON
3 DISTRICT ATTORNEY
4 Nevada Bar No. 001565
5 FAMILY SUPPORT DIVISION
6 1900 East Flamingo Road, Suite 100
7 Las Vegas, Nevada 89119-5168
8 (702) 671-9200
9 TTY and/or other relay services: 711
10 437763100A

District Court
CLARK COUNTY, NEVADA

6 NEVADA DEPT OF HEALTH & HUMAN)
7 SERVICES, DIV. OF WELFARE & SUPPORTIVE)
8 SERVICES, AND (MALIKA COPPEDGE),)

Petitioner,)

Case No. 06R136990

8 vs.)

Department No. CHILD SUPPORT

9 KORI L CAGE,)

10 Respondent.)

MASTER'S RECOMMENDATION

11 This matter having been heard on JULY 06, 2020 before the undersigned Hearing Master, having considered all the evidence
12 and having been fully advised in the premises, hereby makes the following Findings and Recommendations:

13 Parties present: ☒ Respondent ☐ Respondent's attorney ☒ Petitioner ☒ Petitioner's attorney

14 ☐ PATERNITY ☒ PATERNITY PREVIOUSLY DECIDED

15 ☒ FINANCIALS: ☐ CONTINUE PRIOR ORDERS (NO CHANGE TO PRIOR FINANCIAL ORDERS).

16 Basis for adjustment from state formula: _____

Respondent is to pay current support for the child(ren), Kyree Cage, Jayla Nicole Cage,

17 **CHILD SUPPORT**

Respondent is to pay monthly:

18 \$323.00 Temp child support

19 medical support

spousal support

arrear payment

20 ☐ ARREARAGES ☒ ARREARAGES NOT ADDRESSED AT THIS HEARING

21 \$ 323.00

TOTAL monthly payment is due on the 1st day of each month, and continues thereafter until said child(ren)
reach majority, become emancipated or further order of the Court.

22 Respondent's **INCOME SHALL BE WITHHELD** for the payment of support.

23 ☐ Good cause to stay income withholding is based on: _____. Said withholding shall be postponed until Respondent
becomes delinquent in an amount equal to 30 days support.

24 ☐ ENFORCEMENT OF CONTROLLING ORDER: The registered order from _____, dated _____, # _____, is hereby
confirmed and is the controlling order for the following reasons: ☐ only order _____.

25 ☐ ESTABLISHMENT OF CONTROLLING ORDER: This is the first order establishing a child support obligation for this
noncustodial parent for the child(ren) listed in this order who reside(s) with this custodian.

26 ☒ Health insurance coverage for the minor child(ren) herein:

☒ Respondent to provide: ☐ Petitioner to provide: ☐ Both Parties to provide:

27 ☐ if available through employer. ☒ shall provide per court order.

28 ☒ Ordered Party(ies) to provide proof of said insurance to the District Attorney's Office, Family Support Division
within 90 days of today's date.

Under the Affordable Care Act, Medicaid is acceptable coverage.

☐ CONTEMPT OF COURT ☒ NOT A SHOW CAUSE HEARING
☐ MODIFICATION OF PRIOR ORDER:

☐ SUSPENSION OF LICENSES:

PAYMENTS

All mailed payments **MUST** be made in the form of a cashier's check, money order or business check **ONLY**, made payable to State Collection and Disbursement Unit (SCaDU). If payments are made in person, cash or debit card are also accepted. Fees may apply.

Payments can be mailed to:

State Collection and Disbursement Unit (SCaDU)
P.O. Box 98950
Las Vegas, Nevada 89193-8950

Payments can be made in person at:

State Collection and Disbursement Unit (SCaDU)
1900 East Flamingo Road
Las Vegas, Nevada 89119-5168

Additionally, the following information must be included with each payment: name (first, middle, last) of person responsible for paying child support, social security number of person responsible for paying child support, child support case number, and name of petitioner (first and last name of person receiving child support).

NOTICE: NO CREDIT WILL BE GIVEN FOR PAYMENTS PAID DIRECTLY TO THE PETITIONER.

NOTICE: PRIOR ORDERS NOT SPECIFICALLY MODIFIED HEREIN REMAIN IN FULL FORCE AND EFFECT.

NOTICE: Interest will be assessed on all unpaid child support balances for cases with a Nevada controlling order pursuant to NRS 99.040. If the Respondent pays support through income withholding and the full obligation is not met by the amount withheld by the employer, the Respondent is responsible to pay the difference between the court ordered obligation and the amount withheld by the employer directly to the state disbursement unit. If the Respondent fails to do so, he/she may be subject to assessment of interest. The Respondent may avoid these additional costs by making current support payments each month. If another state takes jurisdiction and obtains a new order, Nevada interest will only be calculated to the date of the new order and will be enforced.

NOTICE: Pursuant to NRS 125B.145 and federal law, EITHER parent, the legal guardian, and the Division of Welfare and Supportive Services, where there is an assignment of support rights to the State, has the right to request a review of the support provision of this order at least every three (3) years to determine if modification is appropriate; an application for this purpose may be obtained from D.A. Family Support at 1900 E. Flamingo Rd., Suite 100, Las Vegas, Nevada 89119-5168.

NOTICE: Objections/Appeals are governed by EDCR1.40(e) and (f). You have ten (10) days from receipt of this Master's Recommendation to serve and file written objections to it. A failure to file and serve written objections will result in a final Order/Judgment being ordered by District Court.

NOTICE: Appeal from a Final Judgment by the Court is governed by NRAP 4 and must be filed within 30 days of written Notice of Entry of Judgment.

NOTICE: Respondent is responsible for notifying the District Attorney, Family Support Division, of any change of address, change of employment, health insurance coverage, change of custody, or any order relative to child support within ten (10) days of such change.

NOTICE: If you want to adjust the amount of child support established in this order, you **MUST** file a motion to modify the order with or submit a stipulation to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the child support obligation established in this order will continue until such time as all children who are the subject of this order

reach 18 years of age or, if the youngest child who is subject to this order is still in high school when he or she reaches 18 years of age, when the child graduates from high school or reaches 19 years of age, whichever comes first. Unless the parties agree otherwise in a stipulation, any modification made pursuant to a motion to modify the order will be effective as of the date the motion was filed.

Respondent to bring new financial statement and proof of income next date.

This order does not stay collection of support arrears by execution or any other means allowed by law.

MISCELLANEOUS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS:

There is no decision yet on the objection that was filed by the Respondent. The Court is not making any changes to current Orders. The Respondent has not provided the Medicaid cards as ordered at the last hearing and continues to inform this Court he should not be ordered to provide those to Petitioner. The Court directs that the Order in effect remains the Order unless/until there is an Objection that modifies or nullifies the Order. He is given an additional 10 days to comply with the March 13, 2020 Order.

NEXT HEARING DATE IS September 25, 2020 at 9:00 AM in Courtroom 1 in Child Support Court at Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada, for further proceedings.

DATED: JULY 06, 2020


MASTER

USJR DISPOSITIONS

- ☐ - Settled/Withdrawn w/Judicial Conference/Hearing
☐ - Involuntary (Statutory) Dismissal
☐ - Dismissed / Want of Prosecution
☐ - Transferred to Another Jurisdiction
☐ - Other Manner of Dispo
☐ - Close Case

Respondent/Respondent's Attorney
 Receipt of this document is
 acknowledged by my signature.

ORDER/JUDGMENT

☐ The Clerk of the Court having reviewed the District Court's file and having determined that no objection has been filed within the ten day objection period, **the Master's Recommendation is hereby deemed approved by the District Court pursuant to NRS 425.3844.** The affixing of the Clerk of the Court's file stamp to this Master's Recommendation signifies that the ten-day objection period has expired without an objection having been filed and that the District Court deems the Master's Recommendation to be approved as an **ORDER/JUDGMENT** of the District Court, effective with the file stamp date, without need of a District Court Judge's signature affixed hereto. **The parties are ordered to comply with this Order/Judgment.**

☐ The District Court, having reviewed the above and foregoing Master's Recommendation, and having received and considered the objection thereto, as well as any other papers, testimony and argument related thereto and good cause appearing,

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS affirmed and adopted as an **ORDER/JUDGMENT** of the District Court this _____ day of _____, 20_____.

☐ **IT IS HEREBY ORDERED** that the Master's Recommendation IS NOT affirmed and adopted this _____ day of _____, 20_____, and this matter is remanded to Child Support Court on _____, 20_____ at _____ M.

District Court Judge, Family Division

1 STEVEN B. WOLFSON, Clark County District Attorney
2 Nevada Bar No. 001565

3 By: 

4 DEPUTY DISTRICT ATTORNEY
5 FAMILY SUPPORT DIVISION
6 1900 East Flamingo Road, Suite 100
7 Las Vegas, Nevada 89119-5168
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Steven B. Wolfson, District Attorney, Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road #100
Las Vegas, Nevada 89119-5168

(702) 671-9280 - TTY and/or other relay services: 711

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 18 day of July, 2020, I placed a true and correct copy of the foregoing OBJECTION AND APPEAL THE JULY 6, 2020 MATERS RECOMMENDATIONS in the United States Mail, with first-class postage prepaid, addressed to the following:

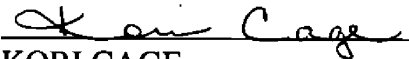
Clerk's Office Filing Dept.
601 N Pecos Road
Las Vegas, Nevada 89101

Steven B. Wolfson, DA
Family Support Division
1900 E. Flamingo Road, Suite 100
Las Vegas, Nevada 89119

Brian E. Blackham
725 South 8th Street, Suite 100
Las Vegas, Nevada 89101

DATED this 18 day of July, 2020.

Pursuant to NRS 53.045, I declare under penalty of perjury that the foregoing is true and correct.

 (signature)
KORI CAGE
8655 Rowland Bluff Ave
Las Vegas, NV 89178
Phone: (702)771-2506
Kcage01@gmail.com
In Proper Person



OPPC
GHANDI DEETER BLACKHAM

Brian E. Blackham, Esq.
Nevada Bar No. 9974
Email: brian@ghandilaw.com
Leah M. Blakesley, Esq.
Nevada Bar No. 12802
Email: leah@ghandilaw.com
725 S. 8th Street, Suite 100
Las Vegas, Nevada 89101
Telephone: (702) 878-1115
Facsimile: (702) 979-2485
Attorneys for Malika Coppedge

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

Nevada Dept Of Health & Human
Services, Div. Of Welfare & Supportive
Services, and (Malika Coppedge),

Case No.: 06R136990

Dept. No.: CHILD SUPPORT

Petitioner,

vs.

Kori L. Cage,

Respondent.

PETITIONER'S RESPONSE TO KORI L. CAGE'S OBJECTION
AND APPEAL THE JULY 6, 2020 MASTERS RECOMMENDATIONS
AND
COUNTERMOTION TO ADOPT MASTER'S RECOMMENDATIONS IN
FULL, AND FOR ATTORNEY'S FEES AND COSTS

///

Petitioner, MALIKA COPPEDGE (Malika), by and through her attorneys, Brian E. Blackham, Esq., and Leah M. Blakesley, Esq., of GHANDI DEETER BLACKHAM, hereby files this Response and Countermotion and requests the relief stated herein.

This Response and Countermotion is made and based upon the papers and pleadings on file herein, the Points and Authorities submitted herewith, and any argument, which may be adduced at the time of hearing.

DATED this 31st day of July 2020.

GHANDI DEETER BLACKHAM

MS

Brian E. Blackham, Esq.
Nevada Bar No. 9974
725 S. 8th Street, Suite 100
Las Vegas, Nevada 89101
Attorney for Petitioner

/ / /

/ / /

/ / /

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **STATEMENT OF FACTS**

4 1. Malika and Respondent Kori Cage (Kori) were never married.
5 However, there are two minor children the issue of their relationship, to wit: Kyree
6 Lovett Cage (Kyree), born December 3, 2004, and Jayla Nicole Cage (Jayla), born
7 February 20, 2007.

8 2. Pursuant to the Findings of Fact, Conclusions of Law, Decision and
9 Orders (FFCLJ), entered by the District Court in Case No. D-07-374223-P on April
10 23, 2018, Malika was awarded primary physical custody of the minor children,
11 subject to Kori's right to specified visitation.

12 3. Based on the custodial timeshare, and Kori's reported income of
13 \$3,262.44 Malika was awarded child support in the amount of \$815.61, due on the
14 first day of each month. Kori was ordered to maintain health insurance for the
15 minor children, with the parties sharing equally in the cost of unreimbursed medical
16 expenses.

17 4. Since the entry of the FFCLJ, Kori requested that his child support
18 obligation be modified and/or suspended based on his termination in employment.

19 5. On December 13, 2019, a hearing was held regarding Kori's request
20 to modify and/or suspended his child support obligation. The Hearing Master issued

1 the following recommendations, which Malika asks that the Court affirm and adopt
2 as the Order of this Court¹:

- 3 a. Temporarily the Court will permit a \$65 per child per month
4 downward deviation for a total monthly support of \$323.00,
5 Effective December 1, 2019, until further order;
- 6 b. Until the Court is clear on the remitter issue or until further
7 order, the underlying amount remains unchanged, but any
8 permanent modification will be as of December 1, 2019;
- 9 c. The Court set no arrears at this time, pending the next Court
10 date;
- 11 d. This Order is temporary per stipulation of the parties pending
12 the next Court date;
- 13 e. The D case to be consulted for any new Orders regarding the
14 impact of the portion that was remanded;
- 15 f. The issues that have been raised in the Motion and
16 Countermotion are still ripe for determination; and
- 17 g. A hearing date was scheduled for March 13, 2020.

18 6. On March 13, 2020, the hearing was held regarding issues still ripe for
19 determination mainly, the status of Kori's appeal and the issue of child support

20 ¹ See Exhibit 1, Report and Recommendations filed on 01/07/2020.

1 arrears. The Court was advised that Kori's appeal was denied however, the Court's
2 order holding Malika's prior child support obligation in abeyance, an issue
3 collateral to the issues presently before the Court, was reversed and remanded to
4 the District Court. At the time of hearing, a remittitur had still not issued in the
5 District Court case. The District Attorney advised the Court that Kori had
6 outstanding child support arrears in the amount of \$2,729.18, which were
7 intercepted from Kori's 2019 tax return. The Court inquired as to the status of Kori's
8 employment and employment efforts, and Kori advised he was still unemployed
9 and receiving unemployment benefits in the amount of \$1,811.00 per month. The
10 District Attorney advised that Kori's unemployment benefits were expected to
11 conclude in September 2020 and, as such, the Court set a Status Check Hearing for
12 September 25, 2020 (subsequently reset to September 22, 2020 at 9:30 a.m.) and
13 issued the following recommendations, which Malika asks that the Court affirm and
14 adopt as the Order of this Court²:

- 15 a. The Court denied Kori's request for a further reduction in child
16 support based on the relative income of the parties;
17 b. The Court denied Kori's request to retroactively apply his
18 modified child support obligation to a date prior to the filing of
19 his Motion to Modify;

20 _____
² See, Exhibit 2, Master's Recommendations, signed March 13, 2020.

**PLEADING
CONTINUES
IN NEXT
VOLUME**