

Electronically Filed
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Elizabeth A. Brown
Clerk of Supreme Court

NOTC

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BARNES LAW GROUP, LLC
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Attorneys for Appellant

**DISTRICT COURT
CLARK COUNTY, NEVADA**

AMANDA REYNOLDS,

Defendant/Appellant,

-vs

ALFREDO MEDELLIN,

Plaintiff/Respondent.

) Supreme Court No.
) District Court Case No.: D-19-590131-C
) Dept. G
)
)
)

NOTICE OF APPEAL

COMES NOW, the Appellant, AMANDA REYNOLDS, by and through her attorneys,
CAROL M. BARNES, ESQ., and ANDREW J. SEMPRAZIK, ESQ., of the BARNES LAW
GROUP, LLC and hereby appeals to the Supreme Court of Nevada the District Court's
November 22nd, 2019 Order by the Honorable Judge Rhonda Forsberg, Department G, Eighth
Judicial District Court, Family Division, Clark County, Nevada, and the District Court's
December 7, 2021 Order by the Honorable judge Stacy Rocheleau, Department W, Eighth
Judicial District Court, Family Division, Clark County, Nevada.

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Dated this 12th day of April 2022.

BARNES LAW GROUP, LLC

/s/ Andrew Semprazik
Andrew Semprazik, Esq.
Nevada Bar No. 15093
712 S. Jones Blvd
Las Vegas, Nevada 89107
(702)382-9011
Attorney for Appellant

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CERTIFICATE OF MAILING

I hereby certify that I am an employee of Barnes Law Group, that on the 12th day of April 2022, I placed a true and correct copy of the **NOTICE OF APPEAL** in the United States mail at Las Vegas, Nevada, with first class postage prepaid to the address below.

Alfredo Medellin
47 Arcturus Ridge Way
Las Vegas, NV 89183
(702) 375-4876
Email: almed123@hotmail.com

/s/ Kurt Belusko
Employee of Barnes Law Group

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

District Court Case #: D-19-590131-C
Dept. W

Case Number: D-19-590131-C

1 2. The Honorable Judge Rhonda Forsberg, Eighth Judicial District Court,
2 Family Division, Dept. G, is the first District Court Judge who issued a Decision
3 wherefrom this appeal arises. The Honorable Judge Stacy Rocheleau, Eighth
4 Judicial District Court, Family Division, Dept. W, is the second District Court
5 judge who issued a Decision wherefrom this appeal arises.
6

7 3. Amanda Reynolds is the Appellant, and her counsel is Andrew
8 Semprazik, Esq., of Barnes Law Group, LLC, 712 South Jones Boulevard, Las
9 Vegas, Nevada 89107.
10

11 4. Alfredo Medellin is the Respondent, and his counsel at the time of the
12 evidentiary hearing was Lynn Hughes, Esq., of Roberts Stoffel Family Law Group,
13 4411 S Pecos Rd, Las Vegas, NV 89121. Alfredo Medellin is currently in proper
14 person.
15

16 5. All counsels involved are active licensed attorneys in the State of
17 Nevada.
18

19 6. Appellant was represented by retained counsel in the District Court
20 proceedings.
21

22 7. Appellant is being represented by retained counsel in this appeal.

23 8. Appellant was not granted leave to proceed *in forma pauperis*.
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1 9. The above-entitled District Court proceedings commenced with the
2 Respondent's filing of a "Complaint to Establish Custody, Child Support,
3 Visitation" on May 24, 2019.
4

5 10. Provide a brief description of the nature of the action and result in the
6 District Court, including the type of judgment or order being appealed and the relief
7 granted by the District Court:
8

9 Appellant Amanda and Respondent Alfredo met as students at Liberty High
10 School in 2004, and dated until 2006. Amanda became pregnant by a man named
11 Tyrell Johnson in 2011. Several months into the pregnancy, Amanda and Alfredo
12 reconnected. Two years after the child Ricardo was born, Alfredo suggested the
13 idea of adding his name to the child's birth certificate, in spite of the fact that the
14 biological father had neither been notified nor his parental rights terminated.
15 Amanda agreed to this idea and the parties carried out the process, with both
16 signing a Voluntary Acknowledgment of Paternity asserting that Alfredo was the
17 only possible biological father of Ricardo. At no point has Alfredo believed he was
18 the biological father of Ricardo.
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22 In 2014, the parties' romantic relationship ceased, though Amanda continued
23 to allow Alfredo to see Ricardo.
24

25 On May 24, 2019, respondent filed a Complaint to Establish Custody, Child,
26 Support, and Visitation, in spite of the fact that the minor child at issue is not
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28

1 biologically his. Thereafter, respondent refused to return the minor child to
2 appellant. On June 3rd, 2019, appellant filed a Motion for a Pickup Order. At the
3 consequential Hearing on June 13th, 2019, Respondent's counsel admitted that
4 Alfredo was not the biological father.
5

6 On August 12th, 2019, Appellant filed a Motion to Dismiss for Failure to Join a
7 Necessary Party and Motion for Summary Judgment and Related Relief.
8

9 On October 24th, 2019, Appellant brought forth a Motion requesting summary
10 judgment and to dismiss for failure to join a necessary party. Department G's district
11 court judge denied the Motion without oral argument. The district court judge stated
12 that "the statute is very clear" and that once a party's name is on the birth certificate
13 and "they've followed the statutes and the time has run, the only way to remove their
14 name from a birth certificate is by termination of parental rights..." The district
15 court judge further stated that "we don't have that here" and "this is long established
16 law."
17

18
19 On November 22nd, 2019, Department G's district court judge issued an Order
20 in case # D-19-590131-C, which found that Alfredo Medellin is the legal father of
21 Ricardo.
22

23 On December 3rd 2019, Department G's district court judge denied Appellant's
24 Ex-Parte Request, which had been filed on November 18th, 2019. The Request was
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1 to order the State of Nevada to produce a copy of the voluntary acknowledgment of
2 paternity, per N.R.S. 440.325(3).

3
4 On December 7, 2021, Department W's district court judge denied Appellant's
5 Motion for Summary Judgment.

6 The instant appeal seeks the following relief:

- 7
- 8 I. An order from this Court directing the district court to vacate its
9 order stating that Alfredo is the legal father or Ricardo;
- 10 II. An order from this Court directing the district judge to grant
11 Appellant's Motion for Summary Judgment stemming from the
12 August 12th, 2019 decision;
- 13
- 14 III. An order from this Court directing the district judge to grant
15 Appellant's Motion for Summary Judgment stemming from the
16 December 7th, 2021 decision;
- 17
- 18 IV. An order from this Court directing the district court to grant
19 Appellant's Motion to Dismiss for Failure to Join a Necessary
20 Party;
- 21
- 22 V. An order from this Court directing the district court to order
23 Alfredo's name be removed from the Voluntary Acknowledgment
24 of Paternity of Ricardo;
- 25
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1 VI. An order from this Court directing the district court to order
2 Nevada Vital Records to remove Alfredo's name from the birth
3 certificate of Ricardo.
4

5 11. Indicate whether the case has previously been the subject of an appeal
6 to or original writ proceeding in the Supreme Court and, if so, the caption and
7 Supreme Court docket number of the prior proceeding:
8

9 This case has previously been the subject of a Petition for Writ of Mandamus
10 or Prohibition, Docket # 80321-COA, filed January 30, 2020. This was denied on
11 March 30, 2020, though the court noted that such argument could be heard after a
12 final decision in the instant case had been reached by the district court.
13

14 12. This case involves child custody and visitation.

15 13. This case does not involve the possibility of settlement.
16

17 Dated this 12th day of April 2022.

18 BARNES LAW GROUP, LLC
19

20 /s/ Andrew Semprazik
21 Andrew Semprazik, Esq.
22 Nevada Bar No. 15093
23 712 S. Jones Blvd
24 Las Vegas, Nevada 89107
25 (702)382-9011
26 (702) 382-0241
27 Attorney for Defendant/Appellant
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CERTIFICATE OF MAILING

I hereby certify that I am an employee of Barnes Law Group, that on the 12th day of April 2022, I placed a true and correct copy of the **CASE APPEAL STATEMENT** in the United States mail at Las Vegas, Nevada, with first class postage prepaid to the address below.

Alfredo Medellin
47 Arcturus Ridge Way
Las Vegas, NV 89183
(702) 375-4876
Email: almed123@hotmail.com

/s/ Kurt Belusko
Employee of Barnes Law Group

EIGHTH JUDICIAL DISTRICT COURT

CASE SUMMARY**CASE NO. D-19-590131-C**

Alfredo Medellin, Plaintiff.
vs.
Amanda Reynolds, Defendant.

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Location: **Department W**
 Judicial Officer: **Rocheleau, Stacy M.**
 Filed on: **05/24/2019**
 Case Number History:

CASE INFORMATION**Statistical Closures**

03/24/2022 Judgment Reached (Bench Trial)
 12/09/2020 Settled/Withdrawn With Judicial Conference or Hearing

Case Type: **Child Custody Complaint**

Case
 Status: **03/24/2022 Closed**








DATE**CASE ASSIGNMENT****Current Case Assignment**

Case Number D-19-590131-C
 Court Department W
 Date Assigned 01/04/2021
 Judicial Officer Rocheleau, Stacy M.

PARTY INFORMATION
















Plaintiff	Medellin, Alfredo	Hughes, Lynn N. <i>Retained</i> 702-474-7007(W)
Defendant	Reynolds, Amanda	Barnes, Carol M. <i>Retained</i> 702-382-9011(W)
Subject Minor	Medellin, Ricardo	Pro Se

DATE**EVENTS & ORDERS OF THE COURT****EVENTS**

04/12/2022	 Case Appeal Statement Filed By: Counter Claimant Reynolds, Amanda <i>[91] Reynolds Case Appeal Statement</i>
04/12/2022	 Notice of Appeal Filed By: Counter Claimant Reynolds, Amanda <i>[90] Reynolds Notice of Appeal</i>
03/29/2022	 Withdrawal of Attorney <i>[89] Withdrawal of Attorney for Plaintiff</i>
03/29/2022	 Notice of Entry of Order <i>[88] Notice of Entry of Amended Order</i>
03/28/2022	 Order <i>[87] Amended Order Denying Defendant's Motion for Summary Judgement and Granting Motion in Limine</i>
03/24/2022	 Notice of Entry of Decree <i>[86] Notice of Entry of Decree of Custody</i>
03/24/2022	 Notice of Entry of Order <i>[85] Notice of Entry of Order</i>



















CASE SUMMARY

CASE NO. D-19-590131-C

03/24/2022	 Custody Decree / Order <i>[84] Decree of Custody</i>
03/24/2022	 Order <i>[83] Order Denying Summary Judgement and Granting Motion In Limine</i>
02/23/2022	 Order to Show Cause <i>[82] Order to Show Cause</i>
12/27/2021	 Order for Family Mediation Center Services <i>[81]</i>
12/20/2021	 Financial Disclosure Form Filed by: Counter Claimant Reynolds, Amanda <i>[80] Updated Financial Disclosure Form of Amanda Reynolds</i>
12/20/2021	 Receipt of Copy Filed By: Counter Claimant Reynolds, Amanda <i>[79] Receipt of Copy for Defendant's Trial Notebook</i>
12/06/2021	 Pre-trial Memorandum <i>[78] Plaintiff's Pre-Trial Memorandum</i>
12/06/2021	 Pre-trial Memorandum Filed By: Counter Claimant Reynolds, Amanda <i>[77] Defendant's Pre-Trial Memorandum</i>
12/03/2021	 Financial Disclosure Form <i>[76] Financial Disclosure Form for Plaintiff</i>
12/03/2021	 Opposition and Countermotion Filed By: Counter Defendant Medellin, Alfredo Party 2: Counter Claimant Reynolds, Amanda <i>[75] Plaintiff's Opposition to Defendant's Motion for Summary Judgment and for Attorney's Fees and Costs and Countermotion for Attorney's Fees</i>
12/03/2021	 Order Shortening Time <i>[74] Order Shortening Time</i>
12/03/2021	 Notice of Rescheduling of Hearing <i>[73] Notice of Rescheduling of Hearing</i>
12/02/2021	 Opposition and Countermotion <i>[72] Plaintiff's Opposition to Motion to Dismiss for Failure to State a Claim Upon which Relief can be Granted and for Attorney's Fees and Costs and Countermotion for Attorney's Fees and Costs</i>
11/30/2021	 Notice <i>[71] Notice of Audio/Visual Appearance</i>
11/29/2021	 Ex Parte Application for Order Party: Counter Claimant Reynolds, Amanda <i>[70] Ex-Parte Application for Order Shortening Time</i>
11/27/2021	 Notice of Hearing <i>[69] Notice of Hearing</i>
11/24/2021	 Family Court Motion Opposition Fee Information Sheet Filed by: Counter Claimant Reynolds, Amanda <i>[68] Family Court Motion Opposition Fee Information Sheet</i>
11/24/2021	 Notice of Motion Filed By: Counter Claimant Reynolds, Amanda <i>[67] Notice of Motion and Motion for Summary Judgment and for Attorney's Fees and Costs</i>
11/18/2021	 Notice of Hearing


















CASE SUMMARY

CASE NO. D-19-590131-C

	<i>[66] Notice of Hearing</i>
11/18/2021	 Family Court Motion Opposition Fee Information Sheet Filed by: Counter Claimant Reynolds, Amanda <i>[65] Family Court Motion Opposition Fee Information Sheet</i>
11/18/2021	 Notice of Motion Filed By: Counter Claimant Reynolds, Amanda <i>[64] Notice of Motion and Motion to Dismiss for Failure to State a Claim upon which relief can be granted and for Attorney's Fees and Costs</i>
06/04/2021	 Order Setting Evidentiary Hearing <i>[63] Order Setting Evidentiary Hearing</i>
06/04/2021	 Notice of Entry Filed By: Counter Claimant Reynolds, Amanda <i>[62] Notice of Entry of Stipulation and Order to Continue Trial</i>
06/04/2021	 Stipulation and Order <i>[61] Stipulation and Order to Continue Trial</i>
05/28/2021	 Notice of Rescheduling of Hearing <i>[60] Notice of Rescheduling of Hearing</i>
05/18/2021	 Order Setting Evidentiary Hearing <i>[59] Order Setting Evidentiary Hearing</i>
05/11/2021	 Notice <i>[58] Notice of Audio/Visual Appearance</i>
04/15/2021	 Notice of Hearing <i>[57] Notice of Hearing</i>
01/04/2021	Administrative Reassignment to Department W <i>Case Reassignment - Judicial Officer Stacy M. Rocheleau</i>
05/07/2020	 Notice <i>[56] Notice In Liew Of Remittitur</i>
01/22/2020	 Notice of Entry of Order <i>[55] Notice of Entry of Order for Stipulation and Order to Continue Evidentiary Hearing</i>
01/22/2020	 Stipulation and Order <i>[54] Stipulation and Order to Continue Evidentiary Hearing</i>
01/08/2020	 Receipt of Copy Filed By: Counter Claimant Reynolds, Amanda <i>[53] Receipt of Copy for Exhibit 38 Bate#150 of the Defendant's 4th 16.2 List of Documents and Witnesses</i>
01/03/2020	 Certificate of Mailing Filed By: Counter Claimant Reynolds, Amanda <i>[52] Certificate of Mailing for Defendant's 4th 16.2 List of Documents and Witnesses to Opposing Counsel</i>
12/26/2019	 Transcript of Proceedings <i>[51] JUNE 13, 2019</i>
12/26/2019	 Transcript of Proceedings <i>[50] OCTOBER 24, 2019</i>
12/26/2019	 Final Billing of Transcript <i>[49] JUNE 13, 2019 & OCTOBER 24, 2019</i>
12/20/2019	 List of Witnesses Filed By: Counter Claimant Reynolds, Amanda <i>[48] Defendant's List of Witnesses</i>

















CASE SUMMARY

CASE NO. D-19-590131-C

12/13/2019	 Supplemental Witness List Filed by: Counter Defendant Medellin, Alfredo <i>[47] Plaintiff, Alfredo Medellin's First Supplemental List of Witnesses</i>
12/11/2019	 Estimate of Transcript <i>[46] JUNE 13, 2019; OCTOBER 24, 2019</i>
12/02/2019	 Notice of Entry Filed By: Counter Defendant Medellin, Alfredo <i>[45] Notice of Entry of Order Confirming Paternity</i>
11/26/2019	 Order Filed By: Counter Defendant Medellin, Alfredo <i>[44] Order Confirming Paternity and Denying Defendant's Motion for Summary Judgment</i>
11/18/2019	 Ex Parte Filed By: Counter Claimant Reynolds, Amanda <i>[43] Defendant's Ex-Parte Request to Produce Voluntary Acknowledgment of Paternity</i>
10/02/2019	 Reply Filed By: Counter Defendant Medellin, Alfredo <i>[42] Plaintiff's Reply to Defendant's Opposition to his Motion for Summary Judgment Regarding Paternity</i>
09/11/2019	 Certificate of Service Filed by: Counter Claimant Reynolds, Amanda <i>[41] Certificate of Service</i>
09/11/2019	 Reply to Opposition Filed by: Counter Claimant Reynolds, Amanda <i>[40] Defendant's Reply to Plaintiff's Opposition to Defendant's Motion to Dismiss for Failure to Join a Necessary Judgment, Motion to Remove Name from Birth Certificate and Affidavit of Paternity, and Motion for Attorney's Fees and Costs and Opposition to Plaintiff's Countermotion for Summary Judgment Regarding Paternity</i>
09/05/2019	 Case Management Order <i>[39] Case and Trial Management Order</i>
09/04/2019	 Declaration of Service Filed by: Counter Claimant Reynolds, Amanda <i>[38] Declaration of Service</i>
08/29/2019	 Notice of Entry Filed By: Counter Defendant Medellin, Alfredo <i>[37] Notice of Entry of Minute Order from Hearing on August 21, 2019</i>
08/28/2019	 Opposition Filed By: Counter Defendant Medellin, Alfredo <i>[36] Plaintiff's Opposition to Defendant's Motion to Dismiss for Failure to Join a Necessary Party...</i>
08/28/2019	 Family Court Motion Opposition Fee Information Sheet Filed by: Counter Defendant Medellin, Alfredo <i>[35] Motion -Opposition Fee Information Sheet</i>
08/21/2019	 Order <i>[34] Holiday and Vacation Plan</i>
08/13/2019	 Notice of Entry of Order <i>[33] Notice of Entry of Order from the July 13, 2019 Hearing</i>
08/12/2019	 Order <i>[32] Order</i>
08/12/2019	 Notice of Hearing <i>[31] Notice of Hearing</i>















CASE SUMMARY

CASE NO. D-19-590131-C

08/12/2019	 Certificate of Service Filed by: Counter Claimant Reynolds, Amanda <i>[30] Certificate of Service</i>
08/12/2019	 Exhibits Filed By: Counter Claimant Reynolds, Amanda <i>[29] Exhibits to Notice of Motion</i>
08/12/2019	 Notice of Motion Filed By: Counter Claimant Reynolds, Amanda <i>[28] Notice of Motion and Motion to Dismiss for Failure to Join a Necessary Party, Motion for Summary Judgment, Motion to Remove Name from Birth Certificate and Affidavit of Paternity, and Motion for Attorney's Fees and Costs</i>
08/06/2019	 Notice of Change of Address Filed By: Counter Defendant Medellin, Alfredo <i>[27] Notice of Change of Address</i>
08/01/2019	 Amended Filed By: Counter Claimant Reynolds, Amanda <i>[26] Amended Answer to Complaint to Establish Custody, Child Support, Visitation and Counterclaim</i>
07/10/2019	 Notice Filed By: Counter Claimant Reynolds, Amanda <i>[25] Notice of Vacating Deposition</i>
07/09/2019	 Notice Filed By: Counter Defendant Medellin, Alfredo <i>[24] Notice of Early Case Conference</i>
06/27/2019	 NRCP 16.2 Case Management Conference Order <i>[23] Order Setting Case Management Conference and Directing Compliance with NRCP 16.205</i>
06/18/2019	 Notice of Change of Address Filed By: Counter Claimant Reynolds, Amanda <i>[22] Notice of Change of Address</i>
06/18/2019	 Answer to Counterclaim Filed by: Counter Defendant Medellin, Alfredo <i>[21] Plaintiff's Answer to Defendant's Counterclaim for Divorce</i>
06/18/2019	 Amended Notice Filed by: Counter Claimant Reynolds, Amanda <i>[20] Amended Notice of Taking of Deposition of Plaintiff, Alfredo Medellin</i>
06/17/2019	 Notice of Taking Deposition Filed by: Counter Claimant Reynolds, Amanda <i>[19] Notice of Taking Deposition of Plaintiff, Alfredo Medellin</i>
06/13/2019	 Order for Family Mediation Center Services <i>[18] Order for Family Mediation Center Services</i>
06/12/2019	 Exhibits Filed By: Counter Claimant Reynolds, Amanda <i>[17] Exhibits to Reply to Plaintiff's Opposition to Defendant's Motion for a Pick-Up Order, and for Attorney's Fees and Costs</i>
06/12/2019	 Reply to Opposition Filed by: Counter Claimant Reynolds, Amanda <i>[16] Reply to Plaintiff's Opposition to Defendant's Motion for a Pick-Up Order, and for Attorney's Fees and Costs</i>
06/11/2019	 Financial Disclosure Form Filed by: Counter Claimant Reynolds, Amanda

CASE SUMMARY

CASE NO. D-19-590131-C

	<i>[15] Financial Disclosure Form of Amanda Reynolds</i>
06/11/2019	 Family Court Motion Opposition Fee Information Sheet Filed by: Counter Defendant Medellin, Alfredo <i>[14] Motion-Opposition Fee Sheet</i>
06/11/2019	 Opposition Filed By: Counter Defendant Medellin, Alfredo <i>[13] Opposition to Defendant's Motion for a Pickup Order and Attorney's Fees and Costs</i>
06/07/2019	 Receipt of Copy Filed By: Counter Claimant Reynolds, Amanda <i>[12] Receipt of Copy for Ex-Parte Application for an Order Shortening Time AND Order Shortening Time</i>
06/07/2019	 Supplemental Exhibits Filed By: Counter Claimant Reynolds, Amanda <i>[11] Supplemental Exhibits to Notice of Motion and Motion for a Pick Up Order, and Attorney Fees and Costs</i>
06/06/2019	 Certificate of Service Filed by: Counter Claimant Reynolds, Amanda <i>[10] Certificate of Service for Answer to Complaint to Establish Custody, Child Support, Visitation, and Counterclaim AND Motion for Pick Up Order AND Exhibits to Motion for Pick Up Order AND Notice of Hearing</i>
06/05/2019	 Order Shortening Time Filed By: Counter Claimant Reynolds, Amanda <i>[9] Order Shortening Time</i>
06/03/2019	 Notice of Hearing <i>[8] Notice of Hearing</i>
06/03/2019	 Ex Parte Application for Order Party: Counter Claimant Reynolds, Amanda <i>[7] Ex-Parte Application for an Order Shortening Time</i>
06/03/2019	 Exhibits Filed By: Counter Claimant Reynolds, Amanda <i>[6] Exhibits to Notice of Motion and Motion for a Pick Up Order, and Attorney Fees and Costs</i>
06/03/2019	 Notice of Motion Filed By: Counter Claimant Reynolds, Amanda <i>[5] Notice of Motion and Motion for a Pick Up Order, and Attorney Fees and Costs</i>
06/03/2019	 Family Court Motion Opposition Fee Information Sheet Filed by: Counter Claimant Reynolds, Amanda <i>[4] Family Court Motion Opposition Fee Information Sheet</i>
06/03/2019	 Answer and Counterclaim Filed By: Counter Claimant Reynolds, Amanda <i>[3] Answer to Complaint to Establish Custody, Child Support, Visitation and Counterclaim</i>
05/24/2019	 Summons Electronically Issued - Service Pending Filed by: Counter Defendant Medellin, Alfredo <i>[2] Summons</i>
05/24/2019	 Complaint for Custody Filed by: Counter Defendant Medellin, Alfredo <i>[1] Complaint to Establish Custody, Child Support and Visitation</i>

HEARINGS

03/31/2022	CANCELED Order to Show Cause (9:00 AM) (Judicial Officer: Rocheleau, Stacy M.) <i>Vacated - per Order</i> <i>Decree from 12/22/21 hearing</i>
02/10/2022	CANCELED Return Hearing (11:00 AM) (Judicial Officer: Rocheleau, Stacy M.)

CASE SUMMARY

CASE NO. D-19-590131-C

Vacated

Re: FMC

01/20/2022

CANCELED Opposition & Countermotion (10:00 AM) (Judicial Officer: Rocheleau, Stacy M.)

Vacated

Plaintiff's Opposition to Motion to Dismiss For Failure to State A Claim Upon Which Relief Can Be Granted and For Attorney's Fees and Costs and Countermotion for Attorney's Fees and Costs

01/20/2022

CANCELED Motion (10:00 AM) (Judicial Officer: Rocheleau, Stacy M.)

Vacated

Notice of Motion and Motion to Dismiss for Failure to State a Claim upon which relief can be granted and for Attorney's Fees and Costs

12/22/2021



Evidentiary Hearing (9:00 AM) (Judicial Officer: Rocheleau, Stacy M.)

Custody - full day

MINUTES

Referred to Family Mediation;

Journal Entry Details:

EVIDENTIARY HEARING: CUSTODY- FULL DAY: COURT CLERK: Ruby Castillo All parties appeared IN PERSON. Upon the Court's inquiry, Counsel both represented they have a Settlement agreement. Parties sworn and testified. Attorney Barnes put the terms on the record. Attorney Barnes advised the Court they will be taking this matter on appeal and requested a referral to the Family Mediation Center (FMC) to adjust the current custodial schedule. COURT stated its FINDINGS and ORDERED the following: 1. Parties shall be REFERRED to the Family Mediation Center (FMC) re: FMC. Order for Family Mediation Center Services EXECUTED and FILED IN OPEN COURT. Copies were provided to both parties. 2. The parties shall have Joint Physical CUSTODY on the week on, week off schedule. 3. The parties shall share Joint Legal CUSTODY except for the two (2) main issues, one parent shall have lead custody. 4. Defendant shall have LEAD CUSTODY on the issues regarding to the minor child's schooling and Plaintiff shall have LEAD CUSTODY. on the medical issues. The parent who has lead custody under that specific topic can ultimately make the decision pending the matter being brought before the Court. 5. Plaintiff's CHILD SUPPORT OBLIGATION shall be \$400.00 per month beginning January of 2022. Defendant has waived Child Support arrears. 6. Plaintiff shall claim the minor child on the TAX DEDUCTION in the even numbered years. 7. Defendant shall claim the minor child on the TAX DEDUCTION in odd numbered years. 8. The Birth Certificate issue shall be RESERVED for appeal.;

SCHEDULED HEARINGS

CANCELED Return Hearing (02/10/2022 at 11:00 AM) (Judicial Officer: Rocheleau, Stacy M.)

Vacated

Re: FMC

12/07/2021



All Pending Motions (10:00 AM) (Judicial Officer: Rocheleau, Stacy M.)

MINUTES



Matter Heard;

Journal Entry Details:

NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGEMENT AND FOR ATTY'S FEES AND COSTS...CALENDAR CALL...PLTF'S OPPOSITION TO DEFT'S MOTION FOR SUMMARY JUDGEMENT AND FOR ATTY'S FEES AND COSTS AND COUNTERMOTION FOR ATTY'S FEES The Court appeared IN PERSON. Counsel and Parties appeared via BLUEJEANS. Attorney Semprazik, Bar #15093, present, with Defendant. Attorney Semprazik addressed the Parties agree Plaintiff is not the biological father, of minor and Plaintiff never officially adopted minor. Minor is aware Plaintiff is not the biological father, as they are different races. Therefore, Plaintiff's custodial rights should be rejected. Counsel discussed what Plaintiff is seeking is a defacto adoption and minors biological father's parental rights were not terminated. Further addressed NRS 125c.004, NRS 126.021, NRS 126.051 and NRS 126.081. Defendant represented Tyrell Johnson is the natural father. Attorney Hughes stated there is a Court order, after a summary judgement motion, saying Plaintiff is the father and Plaintiff is on minors birth certificate. Further, Plaintiff has been held out to be the father and the natural father has not come forward to seek his rights as paternity. The only person making the claim any rights be terminated is Defendant. Defendant seems to want minor fatherless. This action to set aside is untimely. This is the third attempt, by Defendant to say Plaintiff is not the biological father; therefore he has no rights. Counsel requested all evidence regarding said issue be excluded, at trial. Arguments regarding fraud upon the Court, custodial rights, third party visitation rights, the previous summary judgment, proposed summary judgment, 60b, motion in limine and attorney's fees. Court addressed NRS 126.051, NRCP 60d.3, presumption of paternity and the time has run out. Further, there is no proof, of paternity and Tyrell Johnson is the father. COURT FOUND, to much time has passed (six or seven years), for the natural father to come forward to claim custody. Further, the only way to remove Plaintiff, from minors birth certificate is to terminate Plaintiff's parental rights. COURT stated further FINDINGS and ORDERED: 1. The PRIOR ORDERS STAND. 2. The MOTION for SUMMARY JUDGEMENT shall be DENIED. 3. The MOTION IN LIMINE, regarding EVIDENCE of PATERNITY, shall be GRANTED. 4. The HEARINGS currently set for 1/20/22, shall be VACATED. 5. The EVIDENTIARY HEARING

CASE SUMMARY

CASE NO. D-19-590131-C

	<i>set for 12/22/21, STANDS. 6. The TEMPORARY CUSTODIAL TIMESHARE STANDS. Attorney Hughes to prepare an order, from today's hearing.;</i>
12/07/2021	Opposition & Countermotion (10:00 AM) (Judicial Officer: Rocheleau, Stacy M.) <i>Plaintiff's Opposition to Defendant's Motion for Summary Judgment and for Attorney's Fees and Costs and Countermotion for Attorney's Fees</i> Decision Made;
12/07/2021	Motion (10:00 AM) (Judicial Officer: Rocheleau, Stacy M.) <i>Notice of Motion and Motion for Summary Judgment and for Attorney's Fees and Costs</i> Denied;
12/07/2021	Calendar Call (10:00 AM) (Judicial Officer: Rocheleau, Stacy M.) Matter Heard;
05/18/2021	 Status Check (9:00 AM) (Judicial Officer: Rocheleau, Stacy M.) Evidentiary Hearing; Journal Entry Details: <i>The Court appeared IN PERSON. Counsel and Parties appeared via BLUEJEANS. Attorney Semprazik, Bar #15093, present, with Defendant Court clerk trainee, Tonya Mulevonon, also present. Attorney Semprazik stated Parties have not reached any settlements; therefore, requested a trial date, to proceed. Attorney Hughes stated he does not see why a trial is needed, as custody has been resolved. Parties have been doing a one (1) week on / one (1) week off schedule. Court addressed, there are temporary orders and permanent orders need to be in place. Arguments regarding custody and child support. COURT ORDERED: 1. TEMPORARY ORDERS STAND. 2. DISCOVERY CLOSES 30 days, PRIOR to the TRIAL. 10/26/21 11:30 am CALENDAR CALL 11/12/21 9:00 am EVIDENTIARY HEARING: permanent orders and child support (full day);</i>
02/03/2020	CANCELED Evidentiary Hearing (9:00 AM) (Judicial Officer: Forsberg, Rhonda K.) <i>Vacated - per Stipulation and Order</i> <i>Paternity (Stack #1)</i>
01/30/2020	CANCELED Calendar Call (11:00 AM) (Judicial Officer: Forsberg, Rhonda K.) <i>Vacated - per Stipulation and Order</i>
10/24/2019	 All Pending Motions (9:00 AM) (Judicial Officer: Hardcastle, Kathy) MINUTES Matter Heard; Journal Entry Details: <i>DEFENDANT'S MOTION TO DISMISS FOR FAILURE TO JOIN A NECESSARY PARTY, MOTION FOR SUMMARY JUDGMENT, MOTION TO REMOVE NAME FROM BIRTH CERTIFICATE AND AFFIDAVIT OF PATERNITY, AND MOTION FOR ATTORNEY'S FEES AND COSTS...PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS FOR FAILURE TO JOIN A NECESSARY PARTY, MOTION FOR SUMMARY JUDGMENT, MOTION TO REMOVE NAME FROM BIRTH CERTIFICATE AND AFFIDAVIT OF PATERNITY, AND MOTION FOR ATTORNEY'S FEES AND COSTS...DEFENDANT'S REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS FOR FAILURE TO JOIN A NECESSARY PARTY, MOTION FOR SUMMARY JUDGMENT, MOTION TO REMOVE NAME FROM BIRTH CERTIFICATE AND AFFIDAVIT OF PATERNITY, AND MOTION FOR ATTORNEY'S FEES AND COSTS...PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO HIS MOTION FOR SUMMARY JUDGMENT REGARDING PATERNITY Andrew Semprazik, Bar #15093, present as co-counsel on behalf of Defendant. Court noted, it has reviewed all the pleadings and the matters at issue and the statute is very clear once the putative father's name is placed on the birth certificate. The time has run out, and the only way to remove Plaintiff from the birth certificate is by a termination of his parental rights and having another party take over financial responsibility for the child. We do not have that here. Mr. Hughes stated he will reach out to opposing counsel to negotiate a settlement now that the Court has established paternity. Ms. Barnes stated her intent to file a writ with the Supreme Court. COURT ORDERED, Defendant's Motion is DENIED. Plaintiff is the father of the minor child pursuant to Statute. Calendar Call on 1/30/20 and Evidentiary Hearing on 2/3/20 shall STAND as to the issues of child custody/visitation and child support. Mr. Hughes shall prepare the Order from today's hearing. ;</i>
10/24/2019	Opposition (9:00 AM) (Judicial Officer: Hardcastle, Kathy) <i>Plaintiff's Reply to Defendant's Opposition to His Motion for Summary Judgment Regarding Paternity</i> Matter Heard;
10/24/2019	Hearing (9:00 AM) (Judicial Officer: Hardcastle, Kathy) <i>Defendant's Reply to Plaintiff's Opposition to Defendant's Motion to Dismiss for Failure to Join a Necessary Judgment, Motion to Remove Name from Birth Certificate and Affidavit of Paternity, and Motion for Attorney's Fees and Costs and Opposition to Plaintiff's Countermotion for Summary Judgment Regarding Paternity</i> Matter Heard;

CASE SUMMARY

CASE NO. D-19-590131-C

10/24/2019	<p>Opposition (9:00 AM) (Judicial Officer: Hardcastle, Kathy) <i>Plaintiff's Opposition to Defendant's Motion to Dismiss for Failure to Join a Necessary Party...</i> Matter Heard;</p>
10/24/2019	<p>Motion (9:00 AM) (Judicial Officer: Hardcastle, Kathy) <i>Notice of Motion and Motion to Dismiss for Failure to Join a Necessary Party, Motion for Summary Judgment, Motion to Remove Name from Birth Certificate and Affidavit of Paternity, and Motion for Attorney's Fees and Costs</i> Denied;</p>
08/21/2019	<p> All Pending Motions (11:00 AM) (Judicial Officer: Forsberg, Rhonda K.) Matter Heard; Journal Entry Details: CASE MANAGEMENT CONFERENCE...RETURN HEARING: FAMILY MEDIATION CENTER (FMC) MEDIATION Andrew Semprazik, Bar #15093, present as co-counsel on behalf of Defendant. Court noted, at the last hearing counsel was ordered to file briefs on the issue of fraud relative to the birth certificate, yet neither counsel has submitted same. Mr. Semprazik advised the Court a Motion for Summary Judgment was filed on 8/20/19 addressing the fraud issue. Court further noted, the parties were unable to reach an agreement in mediation. Mr. Hughes stated the parties have been exchanging the child every week. Mr. Hughes further requested a trial date. COURT ORDERED, an Evidentiary Hearing is SET for 2/3/2020 (full day/stack #1), with a Calendar Call SET for 1/30/2020 at 10:00 AM. The current VISITATION SCHEDULE shall remain status quo, except that pick-up will occur at 2:10 PM at school. Absent mutual agreement otherwise, the parties shall follow the Court's Standard Holiday Schedule, a copy of which was provided to the parties IN OPEN COURT. Plaintiff shall have to the close of business on 8/30/19 to file a reply to Defendant's Motion for Summary Judgment. Minutes to suffice as the Order of the Court for today's hearing.;</p>
08/21/2019	<p>Case Management Conference (11:00 AM) (Judicial Officer: Forsberg, Rhonda K.) Evidentiary Hearing;</p>
08/21/2019	<p>Return Hearing (11:00 AM) (Judicial Officer: Forsberg, Rhonda K.) <i>re: FMC Mediation</i> Not Settled;</p>
06/13/2019	<p> All Pending Motions (10:00 AM) (Judicial Officer: Forsberg, Rhonda K.) MINUTES Matter Heard; Journal Entry Details: DEFENDANT'S NOTICE OF MOTION AND MOTION FOR A PICKUP ORDER AND ATTORNEY'S FEES AND COSTS...PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR PICKUP ORDER, AND ATTORNEY'S FEES AND COSTS...REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR A PICKUP ORDER, AND FOR ATTORNEY'S FEES AND COSTS Attorney Barnes' Associate also present. Discussion held regarding Plaintiff's withholding of the child, Defendant's negative drug test results, Defendant's parental fitness, Plaintiff's parental rights to the child, paternity, Plaintiff named on the child's birth certificate as an act of fraud, child custody, request for mediation, attorney's fees, child not seeing Defendant on Mother's Day, Father's Day visitation with Plaintiff, and child's school. COURT ORDERED the following: 1. Temporarily, the parties shall share JOINT LEGAL and JOINT PHYSICAL CUSTODY of the minor child. 2. Temporarily, the CUSTODIAL TIMESHARE shall return to the one (1) week on, one (1) week off schedule, child to be exchanged on Mondays. 3. Immediately, Defendant shall receive MAKE-UP TIME with the child for eighteen (18) days, Defendant to receive the child today (06/13/19) at 3:00 p.m. During this period, Plaintiff shall receive the child for Father's Day on Sunday, June 16, 2019 from 12:00 p.m. until 4:00 p.m. 4. Counsel shall submit BRIEFS regarding the issue of Fraud. 5. The child shall return to the SCHOOL near Defendant's home for the upcoming school year. 6. Parties are referred to Family Mediation Center (FMC) for mediation. Order for Family Mediation Services FILED IN OPEN COURT. 7. The issue of ATTORNEY'S FEES is DEFERRED to the Return Hearing. 8. A Return Hearing re: FMC mediation, attorney's fees, and fraud is SET for August 21, 2019 at 11: 00 a.m. Attorney Barnes shall prepare the order from today's hearing; Attorney Hughes to review and countersign.;</p>
06/13/2019	<p> Hearing (10:00 AM) (Judicial Officer: Forsberg, Rhonda K.) <i>Reply to Plaintiff's Opposition to Defendant's Motion for a Pick-Up Order, and for Attorney's Fees and Costs</i> Matter Heard;</p>
06/13/2019	<p>Opposition (10:00 AM) (Judicial Officer: Forsberg, Rhonda K.) <i>Plaintiff's Opposition to Defendant's Motion for a Pick Up Order, and Attorney's Fees and Costs</i> Matter Heard;</p>
06/13/2019	<p>Motion (10:00 AM) (Judicial Officer: Forsberg, Rhonda K.) <i>Defendants Notice of Motion and Motion for a Pickup Order and Attorney Fees and Costs</i> Matter Heard;</p>

CASE SUMMARY**CASE NO. D-19-590131-C**

05/24/2019

SERVICE**Summons**Reynolds, Amanda
Unserved**DATE****FINANCIAL INFORMATION****Attorney** Barnes, Carol M.

Total Charges

96.00

Total Payments and Credits

96.00

Balance Due as of 4/14/2022**0.00****Counter Claimant** Reynolds, Amanda

Total Charges

247.00

Total Payments and Credits

247.00

Balance Due as of 4/14/2022**0.00****Counter Defendant** Medellin, Alfredo

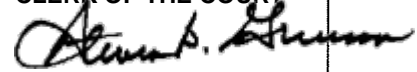
Total Charges

348.32

Total Payments and Credits

348.32

Balance Due as of 4/14/2022**0.00**



1 **DEC**
Lynn N. Hughes, Esq. (6349)
2 **ROBERTS STOFFEL FAMILY LAW GROUP**
4411 South Pecos Road
3 Las Vegas, Nevada 89121
4 PH: (702) 474-7007
FAX: (702) 474-7477
5 EMAIL: efile@lvfamilylaw.com
Attorneys for Plaintiff, Alfredo Medellin

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

9 ALFREDO MEDELLIN,) Case No: D-19-590131-C
) Dept No: G
10 Plaintiff,)
vs.)
11) Date of Hearing: October 24, 2019
12 AMANDA REYNOLDS,) Time of Hearing: 9:00 a.m.
)
13 Defendant.)

14 **ORDER CONFIRMING PATERNITY**

15 **AND DENYING DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT**

16 This matter having come before the Court on Defendant's *Motion to Dismiss for Failure*
17 *to Join a Necessary Party, Motion for Summary Judgment, Motion to Remove Name from Birth*
18 *Certificate and Affidavit of Paternity, and Motion for Attorney's Fees and Costs, and Plaintiff's*
19 *Countermotion for Summary Judgment Regarding Paternity* on October 24, 2019 at 9:00 a.m.
20 Plaintiff Alfredo Medellin appearing in person by and through his attorney, Lynn N. Hughes,
21 Esq., and Defendant Amanda Reynolds appearing in person by and through her attorney Andrew
Semprazik, Esq.

22 The Court, having reviewed of the papers and pleadings on file herein:

23 THE COURT FINDS Plaintiff Alfredo Medellin is identified as the Father on the child's
24 birth certificate. The procedure for removing a parent from the birth certificate is by having the
25 parental rights terminated and having another party take over financial responsibility for the child.
26 That is not the case in this matter.

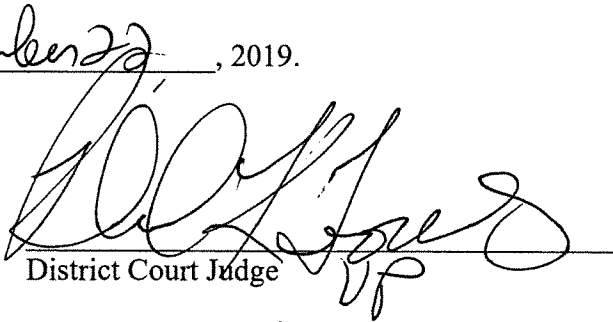
27 **THE COURT HEREBY ORDERS AND DECREES** the Plaintiff, Alfredo Medellin, is
28 the legal father of the child, Ricardo Medellin.

1 **THE COURT FURTHER ORDERS** the Defendant's motions are DENIED.

2 **THE COURT FURTHER ORDERS** the parties shall continue with the temporary joint
3 physical and joint legal custody, as set forth in the prior orders.

4 **THE COURT FURTHER ORDERS** the calendar call on January 30, 2020 and the
5 Evidentiary Hearing set on February 3, 2020 shall stand, and the issues shall be limited to
6 custody, visitation and child support.

7 IT IS SO ORDERED this November 22, 2019.

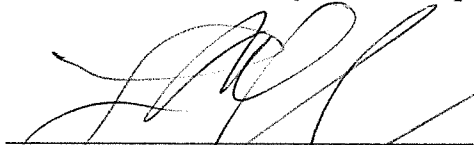
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9
10 District Court Judge

11 Rhonda K. Forsberg

12
13
14 Respectfully submitted:

15 Dated Nov 17th, 2019.


16
17 **Roberts Stoffel Family Law Group**

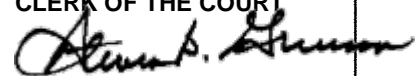
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19
20 Lynn N. Hughes, Esq. (6349)
21 4411 S. Pecos Road
22 Las Vegas, Nevada 89121
23 Attorneys for Plaintiff

Content approved:

Dated NOV. 7th, 2019.

Barnes Law Group, LLC

24 
25
26 Carol Barnes, Esq. (7985)
27 Andrew Semprazik, Esq. (15093)
28 712 S. Jones Blvd.
Las Vegas, Nevada 89107
Attorneys for Defendant



1 **NEO**

2 Lynn N. Hughes, Esq. (6349)

3 **ROBERTS STOFFEL FAMILY LAW GROUP**

4 4411 South Pecos Road

5 Las Vegas, Nevada 89121

6 PH: (702) 474-7007

7 FAX: (702) 474-7477

8 EMAIL: efile@lvfamilylaw.com

9 Attorney for Alfredo Medellin

10
11 **DISTRICT COURT**
12 **CLARK COUNTY, NEVADA**

13 ALFREDO MEDELLIN

14 v.

15 AMANDA RAYNOLDS

} Case No: D-19-590131-C

} Dept. No: G

} **NOTICE OF ENTRY OF**
} **ORDER CONFIRMING**
} **PATERNITY**

16 PLEASE TAKE NOTICE an Order Confirming Paternity and Denying
17 Defendant's Motion for Summary Judgement was duly entered on the 26th day of
18 November 2019, a copy of which is attached hereto and fully incorporated herein
19 by reference.

20 DATED this 2nd day of December 2019.

21 **ROBERTS STOFFEL FAMILY LAW GROUP**

22
23
24 By: 

25 Lynn N. Hughes, Esq. (6349)

26 4411 South Pecos Road

27 Las Vegas, Nevada 89121

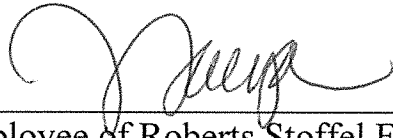
28 Attorney for Plaintiff, Alfredo Medellin


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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group, and on the 2nd day of December 2019, I served by and through Wiz-Net electronic service, pursuant Clark County District Court Administrative Order 14-2 for service of documents identified in Rule 9 of the N.E.F.C.R., the foregoing Order Appointing Administrator with Full Authority to Independently Administer The Estate, and for Issuance of Letters of Independent Administration as follows:

Carol Barnes, Esq.,
esearviceblg@gmail.com

By: 
Employee of Roberts Stoffel Family Law Group



1 **DEC**
2 Lynn N. Hughes, Esq. (6349)
3 **ROBERTS STOFFEL FAMILY LAW GROUP**
4 4411 South Pecos Road
5 Las Vegas, Nevada 89121
6 PH: (702) 474-7007
7 FAX: (702) 474-7477
8 EMAIL: efile@lvfamilylaw.com
9 Attorneys for Plaintiff, Alfredo Medellin

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

9 ALFREDO MEDELLIN,) Case No: D-19-590131-C
) Dept No: G
10 Plaintiff,)
11 vs.)
) Date of Hearing: October 24, 2019
12 AMANDA REYNOLDS,) Time of Hearing: 9:00 a.m.
)
13 Defendant.)

14 **ORDER CONFIRMING PATERNITY**

15 **AND DENYING DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT**

16 This matter having come before the Court on Defendant's *Motion to Dismiss for Failure*
17 *to Join a Necessary Party, Motion for Summary Judgment, Motion to Remove Name from Birth*
18 *Certificate and Affidavit of Paternity, and Motion for Attorney's Fees and Costs*, and Plaintiff's
19 *Countermotion for Summary Judgment Regarding Paternity* on October 24, 2019 at 9:00 a.m.
20 Plaintiff Alfredo Medellin appearing in person by and through his attorney, Lynn N. Hughes,
21 Esq., and Defendant Amanda Reynolds appearing in person by and through her attorney Andrew
Semprazik, Esq.

22 The Court, having reviewed of the papers and pleadings on file herein:

23 THE COURT FINDS Plaintiff Alfredo Medellin is identified as the Father on the child's
24 birth certificate. The procedure for removing a parent from the birth certificate is by having the
25 parental rights terminated and having another party take over financial responsibility for the child.
26 That is not the case in this matter.

27 **THE COURT HEREBY ORDERS AND DECREES** the Plaintiff, Alfredo Medellin, is
28 the legal father of the child, Ricardo Medellin.

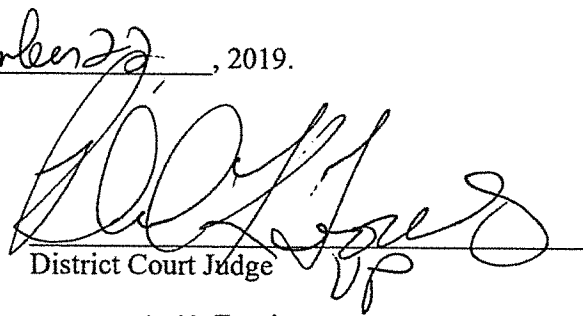
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THE COURT FURTHER ORDERS the Defendant's motions are DENIED.

THE COURT FURTHER ORDERS the parties shall continue with the temporary joint physical and joint legal custody, as set forth in the prior orders.

THE COURT FURTHER ORDERS the calendar call on January 30, 2020 and the Evidentiary Hearing set on February 3, 2020 shall stand, and the issues shall be limited to custody, visitation and child support.

IT IS SO ORDERED this November 22, 2019.



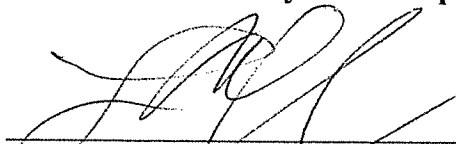
District Court Judge

Rhonda K. Forsberg

Respectfully submitted:

Dated Nov 17th, 2019.

Roberts Stoffel Family Law Group



Lynn N. Hughes, Esq. (6349)
4411 S. Pecos Road
Las Vegas, Nevada 89121
Attorneys for Plaintiff

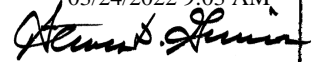
Content approved:

Dated Nov. 7th, 2019.

Barnes Law Group, LLC



Carol Barnes, Esq. (7985)
Andrew Semprazik, Esq. (15093)
712 S. Jones Blvd.
Las Vegas, Nevada 89107
Attorneys for Defendant


CLERK OF THE COURT

1 **ORDR**

2 Lynn N. Hughes, Esq. (6349)

3 **ROBERTS STOFFEL FAMILY LAW GROUP**

4 4411 South Pecos Road

5 Las Vegas, Nevada 89121

6 PH: (702) 474-7007

7 FAX: (702) 474-7477

8 EMAIL: efile@lvfamilylaw.com

9 Attorneys for Plaintiff, Alfredo Medellin

10 **DISTRICT COURT**
11 **FAMILY DIVISION**
12 **CLARK COUNTY, NEVADA**

13 ALFREDO MEDELLIN,

) Case No: D-19-590131-C

) Dept No: G

14 Plaintiff,

15 vs.

16 AMANDA REYNOLDS,

) Date of Hearing: December 7, 2021

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

17 Defendant.

18 **ORDER DENYING DEFENDANT'S**
19 **MOTION FOR SUMMARY JUDGEMENT**
20 **AND GRANTING MOTION IN LIMINE**

21 This matter having come before the Court on Defendant's *Motion for*
22 *Summary Judgment and for Attorney's Fees and Costs*. Plaintiff Alfredo Medellin
23 appearing by video conference by and through his attorney, Lynn N. Hughes, Esq.,
24 and Defendant Amanda Reynolds appearing by video conference by and through
25 her attorney Andrew Semprazik, Esq.

26 The Court, having reviewed of the papers and pleadings on file herein, and
27 having heard argument of counsel at the hearing:

28 ///

///

1 THE COURT FINDS, under NRS 126.051(d), Alfredo Medellin received the
2 child into his home and did openly hold out the child as his natural child for nine
3 years. Therefore, there is a presumption of paternity.

4 THE COURT FURTHER FINDS both parties signed the Voluntary
5 Acknowledgement of Paternity, and if there is fraud, Mom participated in that fraud
6 and cannot now come to the Court with unclean hand and ask for relief from that
7 fraud.

8 THE COURT FURTHER FINDS that, while there is no statute of limitations
9 to claim fraud under NRS 60(d)(3) and NRS 126.053 on the claim of fraud, such a
10 claim to set aside the Voluntary Acknowledgement of Paternity must be done
11 within a reasonable period of time, and that bringing this claim some six to seven
12 years following Ricardo's birth is too long a period of time for any individual to
13 make this claim.

14 THE COURT FURTHER FINDS that once the putative father's name is on
15 the birth certificate, he is presumed to be the legal father of the child. At this time,
16 time has run out and the only way to remove Plaintiff Alfredo Medellin from the
17 birth certificate is by terminating his parental rights and would require another
18 individual to come forward to take over the financial responsibility of the child.

19 THE COURT FURTHER FINDS there is no proof submitted to this Court of
20 the paternity of another individual, including that of Tyrell Johnson, the person
21 alleged as the natural father.

22 **THE COURT HEREBY ORDERS AND DECREES** the Defendant's
23 Motion for Summary Judgment is hereby denied.

24 **THE COURT FURTHER ORDERS** the Plaintiff oral Motion in Limine
25 regarding evidence of paternity is granted. Paternity was confirmed in the
26 November 26, 2019 Court order.

27 **THE COURT FURTHER ORDERS** the parties shall continue with the
28

1 temporary joint physical and joint legal custody, as set forth in the prior orders.

2 **THE COURT FURTHER ORDERS** the Evidentiary Hearing set on
3 December 22, 2021 shall stand, and the issues shall be limited to custody, visitation
4 and child support.

5 **THE COURT FURTHER ORDERS** that all temporary Orders of the Court
6 shall stand.

7 **THE COURT FURTHER ORDERS** the Hearings set for January 20, 2022
8 are hereby vacated.

9 **IT IS SO ORDERED.**

10 Dated this 24th day of March, 2022

11 

12 JM

13 268 173 1915 FCD5
14 Stacy M. Rocheleau
District Court Judge

15 Respectfully submitted:

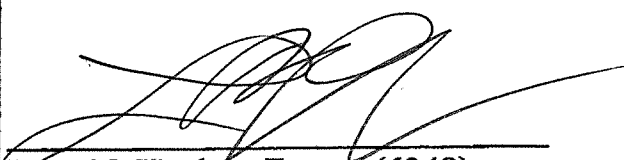
Content approved:

16 Dated MARCH 23, 2022.


Dated March 23rd, 2022.

17 **Roberts Stoffel Family Law Group**

Barnes Law Group, LLC

18 
19
20 Lynn N. Hughes, Esq. (6349)

21 4411 S. Pecos Road
22 Las Vegas, Nevada 89121
23 Attorneys for Plaintiff

24 
25 Carol Barnes, Esq. (7985)
26 Andrew Semprazik, Esq. (15093)
27 712 S. Jones Blvd.
28 Las Vegas, Nevada 89107
Attorneys for Defendant

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Alfredo Medellin, Plaintiff.

CASE NO: D-19-590131-C

7 vs.

DEPT. NO. Department W

8 Amanda Reynolds, Defendant.
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District
12 Court. The foregoing Order was served via the court's electronic eFile system to all
13 recipients registered for e-Service on the above entitled case as listed below:

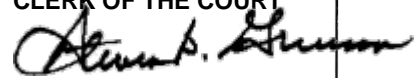
14 Service Date: 3/24/2022

15 Lynn Hughes, Esq.

efile@lvfamilylaw.com

16 Carol Barnes, Esq.

eserviceblg@gmail.com



1 **NEOJ**

2 Lynn N Hughes, Esq.
3 State Bar of Nevada No.6349

4 **ROBERTS STOFFEL FAMILY LAW GROUP**

5 4411 South Pecos Road
6 Las Vegas, Nevada 89121

7 PH: (702) 474-7007

8 FAX: (702) 474-7477

9 EMAIL: efile@lvfamilylaw.com

10 Attorney for Plaintiff, Alfredo Medellin

11 **DISTRICT COURT**
12 **FAMILY DIVISION**
13 **CLARK COUNTY, NEVADA**

14 ALFREDO MEDELLIN,

15 Plaintiff,

16 vs.

17 AMANDA REYNOLDS,

18 Defendant.

Case No: D-19-590131-C

Dept No: W

19 **NOTICE OF ENTRY OF ORDER**

20 Please take notice that an Order Denying Defendant's Motion for Summary
21 Judgment and Granting Motion in Limine was duly entered in the above referenced
22 case on the 24th day of March, 2022, a copy of which is attached hereto and by
23 reference fully incorporated herein.

24 DATED this 24 day of March, 2022.

25 **ROBERTS STOFFEL FAMILY LAW GROUP**

26 By: 

27 Lynn N. Hughes, Esq
28 State Bar of Nevada No. 6349
4411 S. Pecos Road
Las Vegas, Nevada 89121

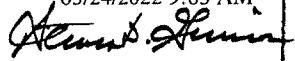
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Roberts Stoffel Family Law Group,
and on the 24th day of March, 2022, I served by and through Wiz-Net electronic
service, pursuant to Clark County District Court Administrative Order 14-2 for
service of documents identified in Rule 9 of the N.E.F.C.R., the foregoing Notice of
Entry of Order Denying Defendant's Motion for Summary Judgment and Granting
Motion in Limine (with the Order Denying Defendant's Motion for Summary
Judgment and Granting Motion in Limine attached thereto), to the following:

Carol Barnes, Esq.,
Email: esearviceblg@gmail.com
Attorney for Defendant

By: 
An Employee of Roberts Stoffel Family Law Group


CLERK OF THE COURT

1 **ORDR**

2 Lynn N. Hughes, Esq. (6349)

3 **ROBERTS STOFFEL FAMILY LAW GROUP**

4 4411 South Pecos Road

5 Las Vegas, Nevada 89121

6 PH: (702) 474-7007

7 FAX: (702) 474-7477

8 EMAIL: efile@lvfamilylaw.com

9 Attorneys for Plaintiff, Alfredo Medellin

10 **DISTRICT COURT**
11 **FAMILY DIVISION**
12 **CLARK COUNTY, NEVADA**

13 ALFREDO MEDELLIN,

) Case No: D-19-590131-C

14 Plaintiff,

) Dept No: G

15 vs.

)

)

) Date of Hearing: December 7, 2021

16 AMANDA REYNOLDS,

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

17 Defendant.

)

)

18 **ORDER DENYING DEFENDANT'S**

19 **MOTION FOR SUMMARY JUDGEMENT**

20 **AND GRANTING MOTION IN LIMINE**

21 This matter having come before the Court on Defendant's *Motion for*
22 *Summary Judgment and for Attorney's Fees and Costs*. Plaintiff Alfredo Medellin
23 appearing by video conference by and through his attorney, Lynn N. Hughes, Esq.,
24 and Defendant Amanda Reynolds appearing by video conference by and through
25 her attorney Andrew Semprazik, Esq.

26 The Court, having reviewed of the papers and pleadings on file herein, and
27 having heard argument of counsel at the hearing:

28 ///

///

1 THE COURT FINDS, under NRS 126.051(d), Alfredo Medellin received the
2 child into his home and did openly hold out the child as his natural child for nine
3 years. Therefore, there is a presumption of paternity.

4 THE COURT FURTHER FINDS both parties signed the Voluntary
5 Acknowledgement of Paternity, and if there is fraud, Mom participated in that fraud
6 and cannot now come to the Court with unclean hand and ask for relief from that
7 fraud.

8 THE COURT FURTHER FINDS that, while there is no statute of limitations
9 to claim fraud under NRS 60(d)(3) and NRS 126.053 on the claim of fraud, such a
10 claim to set aside the Voluntary Acknowledgement of Paternity must be done
11 within a reasonable period of time, and that bringing this claim some six to seven
12 years following Ricardo's birth is too long a period of time for any individual to
13 make this claim.

14 THE COURT FURTHER FINDS that once the putative father's name is on
15 the birth certificate, he is presumed to be the legal father of the child. At this time,
16 time has run out and the only way to remove Plaintiff Alfredo Medellin from the
17 birth certificate is by terminating his parental rights and would require another
18 individual to come forward to take over the financial responsibility of the child.

19 THE COURT FURTHER FINDS there is no proof submitted to this Court of
20 the paternity of another individual, including that of Tyrell Johnson, the person
21 alleged as the natural father.

22 **THE COURT HEREBY ORDERS AND DECREES** the Defendant's
23 Motion for Summary Judgment is hereby denied.

24 **THE COURT FURTHER ORDERS** the Plaintiff oral Motion in Limine
25 regarding evidence of paternity is granted. Paternity was confirmed in the
26 November 26, 2019 Court order.

27 **THE COURT FURTHER ORDERS** the parties shall continue with the
28

1 temporary joint physical and joint legal custody, as set forth in the prior orders.

2 **THE COURT FURTHER ORDERS** the Evidentiary Hearing set on
3 December 22, 2021 shall stand, and the issues shall be limited to custody, visitation
4 and child support.

5 **THE COURT FURTHER ORDERS** that all temporary Orders of the Court
6 shall stand.

7 **THE COURT FURTHER ORDERS** the Hearings set for January 20, 2022
8 are hereby vacated.

9 **IT IS SO ORDERED.**

10 Dated this 24th day of March, 2022

11 

12 JM

13 268 173 1915 FCD5
14 Stacy M. Rocheleau
District Court Judge

15 Respectfully submitted:


Content approved:

16 Dated MARCH 23, 2022.

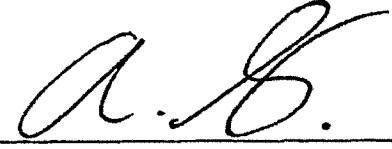
Dated March 23rd, 2022.

17 **Roberts Stoffel Family Law Group**

Barnes Law Group, LLC

18 
19
20

21 Lynn N. Hughes, Esq. (6349)
22 4411 S. Pecos Road
23 Las Vegas, Nevada 89121
Attorneys for Plaintiff

24 
25
26
27
28

Carol Barnes, Esq. (7985)
Andrew Semprazik, Esq. (15093)
712 S. Jones Blvd.
Las Vegas, Nevada 89107
Attorneys for Defendant

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA

4
5
6 Alfredo Medellin, Plaintiff.

CASE NO: D-19-590131-C

7 vs.

DEPT. NO. Department W

8 Amanda Reynolds, Defendant.
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District
12 Court. The foregoing Order was served via the court's electronic eFile system to all
13 recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 3/24/2022

15 Lynn Hughes, Esq.

efile@lvfamilylaw.com

16 Carol Barnes, Esq.

eserviceblg@gmail.com

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

June 13, 2019

D-19-590131-C Alfredo Medellin, Plaintiff.
vs.
Amanda Reynolds, Defendant.

June 13, 2019 10:00 AM All Pending Motions

HEARD BY: Forsberg, Rhonda K.

COURTROOM: Courtroom 09

COURT CLERK: Natalie Castro

PARTIES:

Alfredo Medellin, Plaintiff, Counter Defendant, present	Lynn Hughes, Attorney, present
Amanda Reynolds, Defendant, Counter Claimant, present	Carol Barnes, Attorney, present
Ricardo Medellin, Subject Minor, not present	Pro Se

JOURNAL ENTRIES

- DEFENDANT'S NOTICE OF MOTION AND MOTION FOR A PICKUP ORDER AND ATTORNEY'S FEES AND COSTS...PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR PICKUP ORDER, AND ATTORNEY'S FEES AND COSTS...REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR A PICKUP ORDER, AND FOR ATTORNEY'S FEES AND COSTS

Attorney Barnes' Associate also present.

Discussion held regarding Plaintiff's withholding of the child, Defendant's negative drug test results, Defendant's parental fitness, Plaintiff's parental rights to the child, paternity, Plaintiff named on the child's birth certificate as an act of fraud, child custody, request for mediation, attorney's fees, child not seeing Defendant on Mother's Day, Father's Day visitation with Plaintiff, and child's school.

COURT ORDERED the following:

1. Temporarily, the parties shall share JOINT LEGAL and JOINT PHYSICAL CUSTODY of the minor child.

PRINT DATE:	04/14/2022	Page 1 of 12	Minutes Date:	June 13, 2019
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

2. Temporarily, the CUSTODIAL TIMESHARE shall return to the one (1) week on, one (1) week off schedule, child to be exchanged on Mondays.
3. Immediately, Defendant shall receive MAKE-UP TIME with the child for eighteen (18) days, Defendant to receive the child today (06/13/19) at 3:00 p.m. During this period, Plaintiff shall receive the child for Father's Day on Sunday, June 16, 2019 from 12:00 p.m. until 4:00 p.m.
4. Counsel shall submit BRIEFS regarding the issue of Fraud.
5. The child shall return to the SCHOOL near Defendant's home for the upcoming school year.
6. Parties are referred to Family Mediation Center (FMC) for mediation. Order for Family Mediation Services FILED IN OPEN COURT.
7. The issue of ATTORNEY'S FEES is DEFERRED to the Return Hearing.
8. A Return Hearing re: FMC mediation, attorney's fees, and fraud is SET for August 21, 2019 at 11: 00 a.m.

Attorney Barnes shall prepare the order from today's hearing; Attorney Hughes to review and countersign.

INTERIM CONDITIONS:

FUTURE HEARINGS: Aug 21, 2019 11:00AM Return Hearing
re: FMC Mediation
Courtroom 09 Forsberg, Rhonda K.

PRINT DATE:	04/14/2022	Page 2 of 12	Minutes Date:	June 13, 2019
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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint**COURT MINUTES**

August 21, 2019

D-19-590131-C Alfredo Medellin, Plaintiff.
vs.
Amanda Reynolds, Defendant.

August 21, 2019 11:00 AM All Pending Motions

HEARD BY: Forsberg, Rhonda K.**COURTROOM:** Courtroom 09**COURT CLERK:** Victoria Pott**PARTIES:**

Alfredo Medellin, Plaintiff, Counter Defendant, present	Lynn Hughes, Attorney, present
Amanda Reynolds, Defendant, Counter Claimant, present	Carol Barnes, Attorney, present
Ricardo Medellin, Subject Minor, not present	Pro Se

JOURNAL ENTRIES

- CASE MANAGEMENT CONFERENCE...RETURN HEARING: FAMILY MEDIATION CENTER (FMC) MEDIATION

Andrew Semprazik, Bar #15093, present as co-counsel on behalf of Defendant.

Court noted, at the last hearing counsel was ordered to file briefs on the issue of fraud relative to the birth certificate, yet neither counsel has submitted same. Mr. Semprazik advised the Court a Motion for Summary Judgment was filed on 8/20/19 addressing the fraud issue.

Court further noted, the parties were unable to reach an agreement in mediation. Mr. Hughes stated the parties have been exchanging the child every week. Mr. Hughes further requested a trial date.

COURT ORDERED, an Evidentiary Hearing is SET for 2/3/2020 (full day/stack #1), with a Calendar Call SET for 1/30/2020 at 10:00 AM. The current VISITATION SCHEDULE shall remain status quo, except that pick-up will occur at 2:10 PM at school. Absent mutual agreement otherwise, the parties shall follow the Court's Standard Holiday Schedule, a copy of which was provided to the parties IN

PRINT DATE:	04/14/2022	Page 3 of 12	Minutes Date:	June 13, 2019
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OPEN COURT. Plaintiff shall have to the close of business on 8/30/19 to file a reply to Defendant's Motion for Summary Judgment.

Minutes to suffice as the Order of the Court for today's hearing.

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	04/14/2022	Page 4 of 12	Minutes Date:	June 13, 2019
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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

October 24, 2019

D-19-590131-C Alfredo Medellin, Plaintiff.
vs.
Amanda Reynolds, Defendant.

October 24, 2019 9:00 AM All Pending Motions

HEARD BY: Hardcastle, Kathy

COURTROOM: Courtroom 09

COURT CLERK: Victoria Pott

PARTIES:

Alfredo Medellin, Plaintiff, Counter Defendant, present	Lynn Hughes, Attorney, present
Amanda Reynolds, Defendant, Counter Claimant, present	Carol Barnes, Attorney, present
Ricardo Medellin, Subject Minor, not present	Pro Se

JOURNAL ENTRIES

- DEFENDANT'S MOTION TO DISMISS FOR FAILURE TO JOIN A NECESSARY PARTY, MOTION FOR SUMMARY JUDGMENT, MOTION TO REMOVE NAME FROM BIRTH CERTIFICATE AND AFFIDAVIT OF PATERNITY, AND MOTION FOR ATTORNEY'S FEES AND COSTS...PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS FOR FAILURE TO JOIN A NECESSARY PARTY, MOTION FOR SUMMARY JUDGMENT, MOTION TO REMOVE NAME FROM BIRTH CERTIFICATE AND AFFIDAVIT OF PATERNITY, AND MOTION FOR ATTORNEY'S FEES AND COSTS...DEFENDANT'S REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS FOR FAILURE TO JOIN A NECESSARY PARTY, MOTION FOR SUMMARY JUDGMENT, MOTION TO REMOVE NAME FROM BIRTH CERTIFICATE AND AFFIDAVIT OF PATERNITY, AND MOTION FOR ATTORNEY'S FEES AND COSTS...PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO HIS MOTION FOR SUMMARY JUDGMENT REGARDING PATERNITY

Andrew Semprazik, Bar #15093, present as co-counsel on behalf of Defendant.

Court noted, it has reviewed all the pleadings and the matters at issue and the statute is very clear once the putative father's name is placed on the birth certificate. The time has run out, and the only

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way to remove Plaintiff from the birth certificate is by a termination of his parental rights and having another party take over financial responsibility for the child. We do not have that here.

Mr. Hughes stated he will reach out to opposing counsel to negotiate a settlement now that the Court has established paternity.

Ms. Barnes stated her intent to file a writ with the Supreme Court.

COURT ORDERED, Defendant's Motion is DENIED. Plaintiff is the father of the minor child pursuant to Statute. Calendar Call on 1/30/20 and Evidentiary Hearing on 2/3/20 shall STAND as to the issues of child custody/visitation and child support.

Mr. Hughes shall prepare the Order from today's hearing.

INTERIM CONDITIONS:

FUTURE HEARINGS:

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

May 18, 2021

D-19-590131-C Alfredo Medellin, Plaintiff.
vs.
Amanda Reynolds, Defendant.

May 18, 2021 9:00 AM Status Check

HEARD BY: Rocheleau, Stacy M.

COURTROOM: RJC Courtroom 16C

COURT CLERK: Tiffany Skaggs

PARTIES:

Alfredo Medellin, Plaintiff, Counter Defendant, present	Lynn Hughes, Attorney, present
Amanda Reynolds, Defendant, Counter Claimant, present	Carol Barnes, Attorney, not present
Ricardo Medellin, Subject Minor, not present	Pro Se

JOURNAL ENTRIES

- The Court appeared IN PERSON. Counsel and Parties appeared via BLUEJEANS. Attorney Semprazik, Bar #15093, present, with Defendant

Court clerk trainee, Tonya Mulevonon, also present.

Attorney Semprazik stated Parties have not reached any settlements; therefore, requested a trial date, to proceed.

Attorney Hughes stated he does not see why a trial is needed, as custody has been resolved. Parties have been doing a one (1) week on / one (1) week off schedule.

Court addressed, there are temporary orders and permanent orders need to be in place.

Arguments regarding custody and child support.

COURT ORDERED:

PRINT DATE:	04/14/2022	Page 7 of 12	Minutes Date:	June 13, 2019
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1. TEMPORARY ORDERS STAND.
2. DISCOVERY CLOSES 30 days, PRIOR to the TRIAL.

10/26/21 11:30 am CALENDAR CALL

11/12/21 9:00 am EVIDENTIARY HEARING: permanent orders and child support (full day)

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	04/14/2022	Page 8 of 12	Minutes Date:	June 13, 2019
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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint**COURT MINUTES**

December 07, 2021

D-19-590131-C Alfredo Medellin, Plaintiff.
 vs.
 Amanda Reynolds, Defendant.

December 07, 2021 10:00 AM**All Pending Motions****HEARD BY:** Rocheleau, Stacy M.**COURTROOM:** RJC Courtroom 16C**COURT CLERK:** Tiffany Skaggs**PARTIES:**

Alfredo Medellin, Plaintiff, Counter Defendant, present	Lynn Hughes, Attorney, present
Amanda Reynolds, Defendant, Counter Claimant, present	Carol Barnes, Attorney, not present
Ricardo Medellin, Subject Minor, not present	Pro Se

JOURNAL ENTRIES

- NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGEMENT AND FOR ATTY'S FEES AND COSTS...CALENDAR CALL...PLTF'S OPPOSITION TO DEFT'S MOTION FOR SUMMARY JUDGEMENT AND FOR ATTY'S FEES AND COSTS AND COUNTERMOTION FOR ATTY'S FEES

The Court appeared IN PERSON. Counsel and Parties appeared via BLUEJEANS. Attorney Semprazik, Bar #15093, present, with Defendant.

Attorney Semprazik addressed the Parties agree Plaintiff is not the biological father, of minor and Plaintiff never officially adopted minor. Minor is aware Plaintiff is not the biological father, as they are different races. Therefore, Plaintiff's custodial rights should be rejected. Counsel discussed what Plaintiff is seeking is a defacto adoption and minors biological father's parental rights were not terminated. Further addressed NRS 125c.004, NRS 126.021, NRS 126.051 and NRS 126.081. Defendant represented Tyrell Johnson is the natural father.

Attorney Hughes stated there is a Court order, after a summary judgement motion, saying Plaintiff is the father and Plaintiff is on minors birth certificate. Further, Plaintiff has been held out to be the

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father and the natural father has not come forward to seek his rights as paternity. The only person making the claim any rights be terminated is Defendant. Defendant seems to want minor fatherless. This action to set aside is untimely. This is the third attempt, by Defendant to say Plaintiff is not the biological father; therefore he has no rights. Counsel requested all evidence regarding said issue be excluded, at trial.

Arguments regarding fraud upon the Court, custodial rights, third party visitation rights, the previous summary judgment, proposed summary judgment, 60b, motion in limine and attorney's fees.

Court addressed NRS 126.051, NRCP 60d.3, presumption of paternity and the time has run out. Further, there is no proof, of paternity and Tyrell Johnson is the father.

COURT FOUND, to much time has passed (six or seven years), for the natural father to come forward to claim custody. Further, the only way to remove Plaintiff, from minors birth certificate is to terminate Plaintiff's parental rights.

COURT stated further FINDINGS and ORDERED:

1. The PRIOR ORDERS STAND.
2. The MOTION for SUMMARY JUDGEMENT shall be DENIED.
3. The MOTION IN LIMINE, regarding EVIDENCE of PATERNITY, shall be GRANTED.
4. The HEARINGS currently set for 1/20/22, shall be VACATED.
5. The EVIDENTIARY HEARING set for 12/22/21, STANDS.
6. The TEMPORARY CUSTODIAL TIMESHARE STANDS.

Attorney Hughes to prepare an order, from today's hearing.

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	04/14/2022	Page 10 of 12	Minutes Date:	June 13, 2019
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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

December 22, 2021

D-19-590131-C Alfredo Medellin, Plaintiff.
vs.
Amanda Reynolds, Defendant.

December 22, 2021 9:00 AM Evidentiary Hearing

HEARD BY: Rocheleau, Stacy M.

COURTROOM: RJC Courtroom 03A

COURT CLERK: Ruby Castillo

PARTIES:

Alfredo Medellin, Plaintiff, Counter Defendant, present	Lynn Hughes, Attorney, present
Amanda Reynolds, Defendant, Counter Claimant, present	Carol Barnes, Attorney, present
Ricardo Medellin, Subject Minor, not present	Pro Se

JOURNAL ENTRIES

- EVIDENTIARY HEARING: CUSTODY- FULL DAY:

COURT CLERK: Ruby Castillo

All parties appeared IN PERSON.

Upon the Court's inquiry, Counsel both represented they have a Settlement agreement.

Parties sworn and testified.

Attorney Barnes put the terms on the record. Attorney Barnes advised the Court they will be taking this matter on appeal and requested a referral to the Family Mediation Center (FMC) to adjust the current custodial schedule.

COURT stated its FINDINGS and ORDERED the following:

PRINT DATE:	04/14/2022	Page 11 of 12	Minutes Date:	June 13, 2019
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1. Parties shall be REFERRED to the Family Mediation Center (FMC) re: FMC. Order for Family Mediation Center Services EXECUTED and FILED IN OPEN COURT. Copies were provided to both parties.
2. The parties shall have Joint Physical CUSTODY on the week on, week off schedule.
3. The parties shall share Joint Legal CUSTODY except for the two (2) main issues, one parent shall have lead custody.
4. Defendant shall have LEAD CUSTODY on the issues regarding to the minor child's schooling and Plaintiff shall have LEAD CUSTODY. on the medical issues. The parent who has lead custody under that specific topic can ultimately make the decision pending the matter being brought before the Court.
5. Plaintiff's CHILD SUPPORT OBLIGATION shall be \$400.00 per month beginning January of 2022. Defendant has waived Child Support arrears.
6. Plaintiff shall claim the minor child on the TAX DEDUCTION in the even numbered years.
7. Defendant shall claim the minor child on the TAX DEDUCTION in odd numbered years.
8. The Birth Certificate issue shall be RESERVED for appeal.

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	04/14/2022	Page 12 of 12	Minutes Date:	June 13, 2019
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.



EIGHTH JUDICIAL DISTRICT COURT CLERK'S OFFICE
NOTICE OF DEFICIENCY
ON APPEAL TO NEVADA SUPREME COURT

CAROL BARNES, ESQ.
712 S. JONES BLVD
LAS VEGAS, NV 89107

DATE: April 14, 2022
CASE: D-19-590131-C

RE CASE: ALFREDO MEDELLIN vs. AMANDA REYNOLDS

NOTICE OF APPEAL FILED: April 12, 2022

YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.

PLEASE NOTE: DOCUMENTS **NOT** TRANSMITTED HAVE BEEN MARKED:

- ☒ \$250 – Supreme Court Filing Fee (Make Check Payable to the Supreme Court)**
 - If the \$250 Supreme Court Filing Fee was not submitted along with the original Notice of Appeal, it must be mailed directly to the Supreme Court. The Supreme Court Filing Fee will not be forwarded by this office if submitted after the Notice of Appeal has been filed.
- ☐ \$24 – District Court Filing Fee (Make Check Payable to the District Court)**
- ☒ \$500 – Cost Bond on Appeal (Make Check Payable to the District Court)**
 - NRAP 7: Bond For Costs On Appeal in Civil Cases
 - *Previously paid Bonds are not transferable between appeals without an order of the District Court.*
- ☐ Case Appeal Statement
 - NRAP 3 (a)(1), Form 2
- ☐ Order
- ☐ Notice of Entry of Order

NEVADA RULES OF APPELLATE PROCEDURE 3 (a) (3) states:

"The district court clerk must file appellant's notice of appeal despite perceived deficiencies in the notice, including the failure to pay the district court or Supreme Court filing fee. The district court clerk shall apprise appellant of the deficiencies in writing, and shall transmit the notice of appeal to the Supreme Court in accordance with subdivision (g) of this Rule with a notation to the clerk of the Supreme Court setting forth the deficiencies. Despite any deficiencies in the notice of appeal, the clerk of the Supreme Court shall docket the appeal in accordance with Rule 12."

Please refer to Rule 3 for an explanation of any possible deficiencies.

***Per District Court Administrative Order 2012-01, in regards to civil litigants, "...all Orders to Appear in Forma Pauperis expire one year from the date of issuance." You must reapply for in Forma Pauperis status.*

Certification of Copy

State of Nevada }
County of Clark } SS:

I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, does hereby certify that the foregoing is a true, full and correct copy of the hereinafter stated original document(s):

NOTICE OF APPEAL; CASE APPEAL STATEMENT; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; ORDER CONFIRMING PATERNITY AND DENYING DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT; NOTICE OF ENTRY OF ORDER CONFIRMING PATERNITY; ORDER DENYING DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT AND GRANTING MOTION IN LIMINE; NOTICE OF ENTRY OF ORDER; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

ALFREDO MEDELLIN,

Plaintiff(s),

vs.

AMANDA REYNOLDS,

Defendant(s),

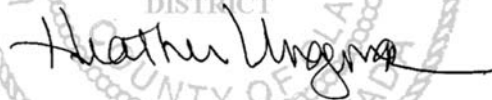
Case No: D-19-590131-C

Dept No: W

now on file and of record in this office.

IN WITNESS THEREOF, I have hereunto
Set my hand and Affixed the seal of the
Court at my office, Las Vegas, Nevada
This 14 day of April 2022.

Steven D. Grierson, Clerk of the Court



Heather Ungermann, Deputy Clerk