

1 **NOA**
2 **THE ISSO & HUGHES LAW FIRM**
3 JENNIFER ISSO, ESQ.
4 Nevada Bar No. 13157
5 2470 Saint Rose Parkway #306f
6 Henderson, Nevada 89074
7 Telephone: (702) 434-4424
8 Email: ji@issohugheslaw.com

Electronically Filed
Apr 27 2022 08:24 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

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

10 HENRY E. GAAR,
11 Plaintiff,
12 vs.

CASE NO: D-20-609211-C
DEPT NO: H

13 TRAKETRA DANIELS,
14 Defendant.

15 **NOTICE OF APPEAL TO APPELLANT COURT**

16
17 PLEASE TAKE NOTICE that pursuant to NRAP 3(c), JENNIFER ISSO,
18 ESQ. of the ISSO & HUGHES LAW FIRM, does hereby appeals to the Supreme
19 Court of Nevada the Order entered on April 12, 2022 containing the Order on the
20 Discovery Commissioners Report and Recommendation.
21

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23 ///

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1
2 DATED this 20th day of April, 2022.

3
4 ISSO & HUGHES LAW FIRM

5 /s/ Jennifer Isso
6 JENNIFER ISSO, ESQ.
7 Nevada Bar No. 13157
8 2470 Saint Rose Parkway #306f
9 Henderson, Nevada 89074
10 Telephone: (702) 434-4424
11 Email: ji@issohugheslaw.com
12 *Attorney for Defendant Un-Bundled*

13 **CERTIFICATE OF SERVICE**

14 I, the undersigned, do hereby certify that on the 20th day of April 2022, a
15 true and correct copy of the Defendant's Notice of Appeal was served via E-
16 service to:
17

18 RACHEL JACOBSON, ESQ.
19 *eservice@Jacobsonlawltd.com*
20 Attorney for Plaintiff

21 /s/ Jennifer Isso
22 An employee of
23 ISSO & HUGHES LAW
24
25
26
27
28

EIGHTH JUDICIAL DISTRICT COURT

CASE SUMMARY**CASE NO. D-20-609211-C**

Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

§
 §
 §
 §

Location: **Department H**
 Judicial Officer: **Ritchie, T. Arthur, Jr.**
 Filed on: **06/19/2020**

CASE INFORMATION**Statistical Closures**

01/19/2021 Settled/Withdrawn Without Judicial Conference or Hearing
 09/01/2020 Settled/Withdrawn With Judicial Conference or Hearing

Case Type: **Child Custody Complaint**

Case Status: **04/14/2021 Reopened**

Case Flags: **Proper Person Mail Returned
 Appealed to Supreme Court
 Filing Fee Balance Due
 \$25 Due Plaintiff's Motion filed
 04-09-21**

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

Case Number D-20-609211-C
 Court Department H
 Date Assigned 06/26/2020
 Judicial Officer Ritchie, T. Arthur, Jr.

PARTY INFORMATION

Plaintiff **Gaar, Henry E**
 5580 Eldora Ave.
 Las Vegas, NV 89146

Attorneys
Jacobson, Rachel M.
Retained
 702-601-0770(W)
Smith, Kurt A.
Retained
 702-410-5001(W)


Defendant **Daniels, Traketra**
 4368 N. Vornsand Dr, #2
 Las Vegas, NV 89115


Neal, Gerald F.
Retained
 702-380-1234(W)


Subject Minor **Gaar, Tristen Malik**

Unbundled Attorney **Isso, Jennifer**
 2470 St. Rose PKWY
 STE 306F
 Henderson, NV 89074

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


















06/19/2020  Complaint for Custody
 Filed by: Plaintiff Gaar, Henry E
[1] Complaint for Child Custody

06/19/2020  Summons Electronically Issued - Service Pending
 Filed by: Plaintiff Gaar, Henry E
[2] Summons

06/19/2020  Summons
 Filed By: Plaintiff Gaar, Henry E
[3] Summons


















CASE SUMMARY

CASE NO. D-20-609211-C

06/22/2020	 Motion Filed By: Plaintiff Gaar, Henry E <i>[4] Motion for Primary Physical Custody of the Minor Child, For Sole Legal Custody, For Child Support, For Medical Coverage, For Visitation at Dad's Discretion for Mom, For the Tax Exemption, For one Half of School and Extra-Curricular Activities Expenses and Costs, For One-Half of Daycare Costs, For Attorneys' Fees and Costs, and For Other Related Relief</i>
06/23/2020	 Notice of Hearing <i>[5] Notice of Hearing</i>
06/24/2020	 Certificate of Mailing Filed By: Plaintiff Gaar, Henry E <i>[6] Certificate of Service</i>
06/26/2020	 Financial Disclosure Form Filed by: Plaintiff Gaar, Henry E <i>[7] Financial Disclosure Form</i>
06/26/2020	 Notice of Department Reassignment <i>[8] Notice of Department Reassignment</i>
07/01/2020	 Ex Parte Application for Order Party: Plaintiff Gaar, Henry E <i>[9] Ex Parte Application for an Order Shortening Time</i>
07/08/2020	 Affidavit of Service Filed By: Plaintiff Gaar, Henry E <i>[10] Affidavit of Service</i>
07/16/2020	 Certificate of Service Filed by: Plaintiff Gaar, Henry E <i>[11] Certificate of Service</i>
07/31/2020	 Financial Disclosure Form Filed by: Plaintiff Gaar, Henry E <i>[12] Amended Financial Disclosure Form</i>
08/03/2020	 Reply Filed By: Plaintiff Gaar, Henry E <i>[13] Reply in Support of Motion for Primary Physical Custody</i>
08/03/2020	 Exhibits Filed By: Plaintiff Gaar, Henry E <i>[14] Plaintiff's Exhibit Appendix</i>
08/05/2020	 Order for Family Mediation Center Services <i>[15]</i>
08/14/2020	 NRCP 16.2 Case Management Conference Order <i>[16] D-20-609211-C CMCN Gaar v Daniels</i>
09/01/2020	 Order <i>[17] Order from August 5, 2020 Hearing.To Dept 09.01.20</i>
09/01/2020	 Notice of Entry of Order Filed By: Plaintiff Gaar, Henry E <i>[18] Notice of Entry of Order from August 5, 2020 Hearing</i>
09/03/2020	 Stipulation and Order <i>[20] Stipulation and Order.To Dept 09.03.20</i>
09/03/2020	 Notice of Entry of Order Filed By: Plaintiff Gaar, Henry E <i>[21] Notice of Entry of Stipulation and Order to Continue</i>

















CASE SUMMARY

CASE NO. D-20-609211-C

10/21/2020	 Parenting Agreement <i>[22] Parenting Agreement</i>
10/23/2020	 Substitution of Attorney Filed By: Plaintiff Gaar, Henry E <i>[23] Substitution of Attorney</i>
10/23/2020	 Order Setting Civil Non-Jury Trial <i>[24] Order Setting Civil Non-Jury Trial-Garr v Daniels</i>
01/19/2021	 Custody Decree / Order <i>[25] 21-1-19 Gaar H. Decree of Custody</i>
01/19/2021	 Notice of Entry <i>[26] Notice of Entry Decree of Custody</i>
01/19/2021	 Withdrawal of Attorney <i>[27] Withdrawal of Attorney</i>
04/09/2021	 Motion Filed By: Attorney Jacobson, Rachel M.; Plaintiff Gaar, Henry E <i>[28] Plaintiff's Motion for Set Aside Decree of Custody or, in the Alternative, Modify Custody and Motion for Review of Child Support, for Orer to Show Cause, and for Related Relief</i>
04/14/2021	 Notice of Hearing <i>[29] Notice of Hearing</i>
04/14/2021	 Certificate of Service Filed by: Plaintiff Gaar, Henry E <i>[30] Certificate of Service</i>
04/23/2021	 Opposition and Countermotion Filed By: Attorney Neal, Gerald F.; Defendant Daniels, Traketra <i>[31] Defs Opposition to Plaintiff's Motion for Set Aside Decree of Custody or, in The Alternative, Modify Custody and Motion for Review of Child Support, for Order to Show Cause, and for Related Relief and Counter Motion to Change Custody Due to Change in Circumstances and for the Plaintiff to Pay for Day Care and for Attorney's Fees</i>
04/23/2021	 Exhibits Filed By: Defendant Daniels, Traketra <i>[32] Defendant's Exhibit Appendix</i>
04/29/2021	 Notice of Hearing <i>[33] Notice of Hearing</i>
05/11/2021	 Exhibits Filed By: Plaintiff Gaar, Henry E <i>[34] Plaintiff's Exhibit Appendix</i>
05/13/2021	 Reply to Opposition Filed by: Attorney Jacobson, Rachel M.; Plaintiff Gaar, Henry E <i>[35] Plaintiff's Reply to Opposition</i>
05/14/2021	 Exhibits Filed By: Defendant Daniels, Traketra <i>[36] Defendant's First Supplemental Exhibit Appendix</i>
07/01/2021	 Exhibits Filed By: Defendant Daniels, Traketra <i>[37] Defendant's Second Supplemental Exhibit Appendix</i>
07/01/2021	 Exhibits Filed By: Plaintiff Gaar, Henry E <i>[38] Exhibit Appendix</i>
















CASE SUMMARY

CASE NO. D-20-609211-C

09/29/2021	 Motion Filed By: Plaintiff Gaar, Henry E <i>[39] Plaintiff's Motion For An Order To Show Cause, To Modify Custody And Related Relief, And For Attorney's Fees And Costs Comes Now Plaintiff, Henry E. Gaar</i>
09/30/2021	 Notice of Hearing <i>[40] Notice of Hearing</i>
09/30/2021	 Certificate of Service Filed by: Plaintiff Gaar, Henry E <i>[41] Certificate of Service - Motion and Notice of Hearing</i>
10/04/2021	 Order <i>[42] 20210929130121328</i>
10/04/2021	 Notice of Entry Filed By: Defendant Daniels, Traketra <i>[43] Notice of Entry of Order</i>
10/06/2021	 Motion Filed By: Defendant Daniels, Traketra <i>[44] Motion to Withdraw as Counsel of Record for Defendant</i>
10/06/2021	 Notice of Hearing <i>[45] Notice of Hearing</i>
10/07/2021	 Opposition and Countermotion Filed By: Defendant Daniels, Traketra Party 2: Plaintiff Gaar, Henry E <i>[46] Defendant's Opposition To Plaintiff's Motion For An Order To Show Cause, To Modify Custody And Related Relief, And For Attorney's Fees And Costs, And Defendant's Countermotion For Attorney's Fees And Other Related Relief</i>
10/12/2021	 Exhibits Filed By: Defendant Daniels, Traketra <i>[47] DEFENDANT S SUPPLEMENTAL EXHIBITS</i>
10/19/2021	 Reply to Opposition Filed by: Plaintiff Gaar, Henry E <i>[48] Reply to Opposition and Countermotion</i>
10/20/2021	 Exhibits Filed By: Plaintiff Gaar, Henry E <i>[49] Exhibit Appendix</i>
11/01/2021	 Exhibits Filed By: Plaintiff Gaar, Henry E <i>[50] Supplemental Exhibits Appendix</i>
11/09/2021	 Exhibits Filed By: Plaintiff Gaar, Henry E <i>[51] Supplemental Exhibit Appendix</i>
11/16/2021	 Exhibits Filed By: Plaintiff Gaar, Henry E <i>[52] Supplemental Exhibit Appendix</i>
11/18/2021	 Notice Filed By: Plaintiff Gaar, Henry E <i>[53] Notice of Unavailability of Counsel</i>
11/19/2021	 Order Setting Evidentiary Hearing <i>[54] Order Setting Evidentiary Hearing - Gaar v Daniels</i>
12/07/2021	

CASE SUMMARY

CASE NO. D-20-609211-C

	 Brief Filed By: Defendant Daniels, Traketra <i>[55] DEFENDANT S SUPPLEMENTAL BRIEF IN SUPPORT OF OPPOSITION AND COUNTERMOTION</i>
12/07/2021	 Exhibits Filed By: Defendant Daniels, Traketra <i>[56] DEFENDANT S SUPPLEMENTAL EXHIBITS</i>
12/07/2021	 Witness List Filed by: Defendant Daniels, Traketra <i>[57] DEFENDANT S LIST OF WITNESSES AND PRODUCTION OF DOCUMENTS PURSUANT TO NRCP 16.2</i>
12/07/2021	 Brief Filed By: Plaintiff Gaar, Henry E <i>[58] Brief</i>
12/16/2021	 Notice of Taking Deposition Filed by: Plaintiff Gaar, Henry E <i>[59] Notice of Taking Deposition</i>
12/20/2021	 Notice of Deposition Filed by: Defendant Daniels, Traketra <i>[60] NOTICE OF DEPOSITION</i>
01/11/2022	 Financial Disclosure Form Filed by: Plaintiff Gaar, Henry E <i>[61] Financial Disclosure Form</i>
01/14/2022	 Financial Disclosure Form Filed by: Defendant Daniels, Traketra <i>[62] Financial Disclosure Form</i>
01/14/2022	 Witness List Filed by: Defendant Daniels, Traketra <i>[63] DEFENDANT S FIRST SUPPLEMENTAL LIST OF WITNESSES AND PRODUCTION OF DOCUMENTS PURSUANT TO NRCP 16.2</i>
01/14/2022	 List of Witnesses Filed By: Plaintiff Gaar, Henry E <i>[64] List of Witnesses and Exhibits</i>
01/18/2022	 Affidavit of Service Filed By: Defendant Daniels, Traketra <i>[65] Affidavit of Service</i>
01/22/2022	 Exhibits Filed By: Defendant Daniels, Traketra <i>[66] DEFENDANT S SECOND SUPPLEMENTAL LIST OF WITNESSES AND PRODUCTION OF DOCUMENTS PURSUANT TO NRCP 16.2</i>
01/23/2022	 Exhibits Filed By: Defendant Daniels, Traketra <i>[67] DEFENDANT S THIRD SUPPLEMENTAL LIST OF WITNESSES AND PRODUCTION OF DOCUMENTS PURSUANT TO NRCP 16.2</i>
01/24/2022	 Affidavit of Service Filed By: Defendant Daniels, Traketra <i>[68] Affidavit of Service</i>
01/24/2022	 Motion to Compel Filed by: Plaintiff Gaar, Henry E <i>[69] Plaintiff's Motion to Compel Defendant's Compliance with Discovery, for Adverse Inerernces and Sanctions for Her Failure to Comply with Discovery, and for Attorney's Fees and Related Relief</i>


















CASE SUMMARY

CASE NO. D-20-609211-C

01/25/2022	 Exhibits Filed By: Plaintiff Gaar, Henry E <i>[70] Exhibit Appendix</i>
01/25/2022	 Ex Parte Application for Order Party: Plaintiff Gaar, Henry E <i>[71] Ex Parte Application for Order Shortening Time</i>
01/26/2022	 Order Shortening Time <i>[72] Order Shortening Time</i>
01/26/2022	 Notice of Entry of Order Filed By: Plaintiff Gaar, Henry E <i>[73] Notice of Entry of Order</i>
01/29/2022	 Exhibits Filed By: Defendant Daniels, Traketra <i>[74] DEFENDANT S TRIAL EXHIBIT PACKET</i>
01/31/2022	 Pre-trial Memorandum Filed By: Defendant Daniels, Traketra <i>[75] DEFENDANT S PRE-TRIAL MEMORANDUM</i>
01/31/2022	 Exhibits Filed By: Defendant Daniels, Traketra <i>[76] DEFENDANT S TRIAL EXHIBIT PACKET</i>
01/31/2022	 Pre-trial Memorandum Filed By: Plaintiff Gaar, Henry E <i>[77] Pre-Trial Memorandum</i>
02/01/2022	 Notice Filed By: Defendant Daniels, Traketra <i>[78] Notice of Unavailability</i>
02/01/2022	 Exhibits Filed By: Defendant Daniels, Traketra <i>[79] Defendant's Talking Parent Exhibit</i>
02/02/2022	 Re-Notice Filed by: Plaintiff Gaar, Henry E <i>[80] Re-Notice of Taking Deposition of Defendant</i>
02/08/2022	 Notice of Rescheduling of Hearing <i>[81] Notice of Rescheduling the Conclusion of the Evidentiary Hearing from February 2, 2022</i>
02/14/2022	 Notice of Deposition Filed by: Plaintiff Gaar, Henry E <i>[82] Second Re-Notice of Deposition</i>
02/14/2022	 Notice of Deposition Filed by: Plaintiff Gaar, Henry E <i>[83] Amended Second Re-Notice of Deposition</i>
02/14/2022	 Notice of Deposition Filed by: Plaintiff Gaar, Henry E <i>[84] 2nd Amended Re-Notice of Deposition</i>
02/22/2022	 Discovery Commissioners Report and Recommendations <i>[85] Discovery Commissioners Report and Recommendations</i>
02/27/2022	 Objection to Discovery Commissioners Report and Recommend Filed by: Defendant Daniels, Traketra <i>[86] Defendant's Objection To Discovery Commissioner's Report and Recommendations</i>

CASE SUMMARY

CASE NO. D-20-609211-C

02/28/2022	 Memorandum of Costs and Disbursements Filed by: Plaintiff Gaar, Henry E <i>[87] Memorandum of Fees and Costs</i>
03/04/2022	 Notice of Hearing <i>[88] Notice of Hearing</i>
03/04/2022	 Opposition Filed By: Defendant Daniels, Traketra <i>[89] Defendant's Opposition To Plaintiff's Memorandum Of Fees And Costs Et. Al And Motion To Strike Memorandum</i>
03/04/2022	 Supplement Filed by: Plaintiff Gaar, Henry E <i>[90] Plaintiff's Supplement to Memorandum of Fees and Costs</i>
03/07/2022	 Notice of Hearing <i>[91] Notice of Hearing</i>
03/07/2022	 Notice of Hearing <i>[92] Notice of Hearing</i>
03/16/2022	 Notice of Hearing <i>[93] Notice of Hearing - Discovery</i>
03/17/2022	 Response Filed By: Plaintiff Gaar, Henry E <i>[94] Response to Defendant's Objection</i>
03/22/2022	 Response Filed By: Plaintiff Gaar, Henry E <i>[95] Response to Opposition to Memorandum of Attorney's Fees and Costs</i>
03/22/2022	 Notice of Taking Deposition Filed by: Plaintiff Gaar, Henry E <i>[96] Third Notice of Taking Deposition of Defendant</i>
03/22/2022	 Ex Parte Application for Order Party: Plaintiff Gaar, Henry E <i>[97] Ex Parte Application for Order Shortening Time</i>
03/24/2022	 Exhibits Filed By: Defendant Daniels, Traketra <i>[98] EXHIBITS IN SUPPORT OF OBJECTION TO DISCOVERY COMMISSIONERS REPORT AND RECOMMENDATION</i>
03/25/2022	 Notice of Deposition Filed by: Plaintiff Gaar, Henry E <i>[99] Notice of Deposition</i>
04/05/2022	 Exhibits Filed By: Plaintiff Gaar, Henry E <i>[100] Exhibit Appendix</i>
04/12/2022	 Order <i>[101] DCR&R ORDR D-20-609211-C Gaar v Daniels</i>
04/12/2022	 Notice of Entry of Order Filed By: Plaintiff Gaar, Henry E <i>[102] Notice of Entry of Order on DC's Report and Recommendations</i>
04/14/2022	 Notice of Withdrawal Filed by: Defendant Daniels, Traketra <i>[103] Notice of Withdrawal of Unbundled Attorney</i>

CASE SUMMARY

CASE NO. D-20-609211-C

04/19/2022



Ex Parte

[104] Ex Parte Motion for Continuance

04/20/2022



Notice of Appeal

Filed By: Defendant Daniels, Traketra

[105] NOTICE OF APPEAL TO APPELLANT COURT

HEARINGS

08/03/2020



Motion (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

08/03/2020, 08/05/2020

Plaintiff's Motion for Primary Physical Custody of the Minor Child, for Sole Legal Custody, for Child Support, for Medical Coverage, for Visitation at Dad's Discretion for Mom, for the Tax Exemption, for one Half of School and Extra-Curricular Activities Expenses and Costs, for One Half of Day Care Costs, for Attorney's Fees and Costs, and for Other Related Relief (Cont. from 8/3/2020)

07/28/2020 Reset by Court to 08/04/2020

08/04/2020 Reset by Court to 08/03/2020

Matter Continued;

Referred to Family Mediation;

Journal Entry Details:

This matter is a companion case with D-20-609552-D and T-20-206283-T heard simultaneously. Both parties, Attorney Smith, and Attorney Neal appeared telephonically, pursuant to the Administrative Orders for public safety. Court stated it reviewed the TPO case and all the documents in the domestic cases. Attorney Smith stated Plaintiff is requesting joint physical custody, his best days are Monday to Thursday during the week, and his busiest days are on the weekends. Court noted there was an allegation that there was a video of the altercation that occurred on 6/12/2020. Attorney Neal stated Defendant has the video, they are not sure out clear it is, and that is why they held it. Further, the incident occurred at the marital residence when Plaintiff did not return the child for an appointment. Also, there is a hearing on 10/4/2020 in Henderson, NV. Defendant is requesting an extension of the Protection Order. Attorney Neal stated Defendant is requesting temporary primary physical custody, and she has her own apartment. Discussion regarding the gun, the parties' employments, the parties' incomes, and Defendant currently being on Worker's Comp. for an injury at work. Court stated it has jurisdiction over the subject matter and the parties COURT ORDERED, the following: Parties REFERRED to the FAMILY MEDIATION CENTER to formulate a PARENTING AGREEMENT, with SAFETY PROTOCOL. Return date set. Parties shall share JOINT LEGAL CUSTODY. TEMPORARILY, Plaintiff's TIME SHARE shall be from Monday at 9:00 AM until Thursday at 6:00 PM. TEMPORARILY, Defendant's TIME SHARE shall be from Thursday at 6:00 PM until Monday at 9:00 AM. The EXCHANGES shall take place at 2801 N. RAINBOW BLVD. Parties are to have NO CONTACT between them and EVERYTHING is to go through their attorneys. Issue of ATTORNEY'S FEES shall be DEFERRED. Plaintiff shall PAY Defendant \$900.00 per month in CHILD SUPPORT, beginning 8/1/2020, and shall be due on the FIRST DAY of each month, thereafter. The PROTECTION ORDER in case no. T-20-206283-T shall be EXTENDED to 9/16/2020, and AMENDED to include the CUSTODY SCHEDULE and EXCHANGES are EXEMPT. The HEARING scheduled for 8/24/2020 at 11:00 AM in the case no. T-20-206283-T, shall be VACATED. All FUTURE documents shall be FILED in the lower case number D-20-609211-C. 9/16/2020 11:00 AM RETURN: FMC (MEDIATION) - Regional Justice Center, Courtroom 3G ;

Matter Continued;

Referred to Family Mediation;

Journal Entry Details:

Both parties, Attorney Smith, and Attorney Neal appeared telephonically, pursuant to the Administrative Orders for public safety. Court Marshal stated he did not have a good phone number for Defendant. Attorney Smith stated Defendant is now represented by Attorney Gerald Neal. Attorney Neal was called and he proved the phone number for Defendant to appear. Attorney Smith stated Plaintiff has not seen the child in two months. Attorney Neal stated Plaintiff has two (2) active domestic violence charges. Attorney Smith stated there was an arrest in June, 2020. Court noted the case number is D-20-609552-P that Attorney Neal filed for Defendant, and the hearing set on that case of 8/5/2020 at 10:00 AM will stand. Attorney Neal stated they had a hearing in the Protection Order case (T-20-206283-T) and the Protection Order was extended to 8/5/2020. Further, everything has been filed in the "T" case. Court informed counsel it can see the paperwork filed in the "T" case. COURT ORDERED, the following: Cases D-20-609552-P and D-20-609211-C shall be LINKED, and all documents shall be filed in the LOWER CASE number. Matter CONTINUED to be heard with case D-20-609552-P on 8/5/2020 at 10:00 AM. CONTINUED TO: 8/5/2020 10:00 AM - Regional Justice Center, Courtroom 3G;

10/20/2020

Return Hearing (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

FMC (MEDIATION)

09/16/2020 Reset by Court to 10/20/2020

Non Jury Trial;

10/20/2020

Case Management Conference (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

CASE SUMMARY

CASE NO. D-20-609211-C

09/16/2020 Reset by Court to 10/20/2020

Non Jury Trial;

10/20/2020



All Pending Motions (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Non Jury Trial;

Journal Entry Details:

RETURN HEARING: FMC (MEDIATION) CASE MANAGEMENT CONFERENCE COURT CLERKS: Kathy Prock/Tiffany Schmidt (ts) This matter is a companion case with (Case # T-20-208717-T) heard simultaneously. Both parties, Attorney Smith and Attorney Neal appeared telephonically, pursuant to Administrative Orders for public safety. Court reviewed the history of the case. Court stated a letter was received from the Family Mediation Center indicating the parties participated in mediation and reached a Partial Parenting Agreement. Parties could not agree on the regular time share. Both counsel stated they are fine with the Court E-filing the Partial Parenting Agreement. Discussion regarding the Temporary Protection Order (TPO). Attorney Neal requested to extend the TPO until trial. Attorney Smith argued that the TPO is unnecessary. Further discussion regarding Attorney s fees and the parties using Talking Parents to communicate. COURT ORDERED, the following: NON-JURY TRIAL set. DISCOVERY CUTOFF shall be 12/18/2020. PARTIAL PARENTING AGREEMENT affirmed and adopted by the court. Parties shall continue to follow the TEMPORARY TIME SHARE. PROTECTION ORDER (case # T-20-208717-T) shall be EXTENDED to 1/12/2021. Per agreement by counsel, the parties use of Talking Parents will not be a violation of the PROTECTION ORDER. Defendant shall be AWARDED Attorney s fees and costs in the amount of \$2,000.00 to be paid by Plaintiff within 30 days. Attorney Smith shall prepare the ORDER and allow Attorney Neal to review and sign off. 1/21/2021 1:30PM NON-JURY TRIAL-Regional Justice Court, Courtroom 3G ;

01/21/2021

CANCELED Non-Jury Trial (1:30 PM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Vacated - per Judge

05/19/2021



Motion (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Plaintiff's Motion for Set Aside Decree of Custody or, in the Alternative, Modify Custody and Motion for Review of Child Support, for Order to Show Cause, and for Related Relief (Cont from 5/19/2021)

Denied;

set in error

05/19/2021

Opposition & Countermotion (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

05/19/2021, 07/07/2021

Def's Opposition to Plaintiff's Motion for Set Aside Decree of Custody or, in The Alternative, Modify Custody and Motion for Review of Child Support, for Order to Show Cause, and for Related Relief and Counter Motion to Change Custody Due to Change in Circumstances and for the Plaintiff to Pay for Day Care and for Attorney's Fees (Cont from 5/19/2021)

Matter Continued;

Matter Heard;

Matter Continued;

Matter Heard;

05/19/2021



All Pending Motions (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Matter Heard;

Journal Entry Details:

PLAINTIFF'S MOTION FOR SET ASIDE DECREE OF CUSTODY OR, IN THE ALTERNATIVE, MODIFY CUSTODY AND MOTION FOR REVIEW OF CHILD SUPPORT, FOR ORDER TO SHOW CAUSE, AND FOR RELATED RELIEF DEF'S OPPOSITION TO PLAINTIFF'S MOTION FOR SET ASIDE DECREE OF CUSTODY OR, IN THE ALTERNATIVE, MODIFY CUSTODY AND MOTION FOR REVIEW OF CHILD SUPPORT, FOR ORDER TO SHOW CAUSE, AND FOR RELATED RELIEF AND COUNTER MOTION TO CHANGE CUSTODY DUE TO CHANGE IN CIRCUMSTANCES AND FOR THE PLAINTIFF TO PAY FOR DAY CARE AND FOR ATTORNEY'S FEES Plaintiff in office with Attorney Rachel Jacobson and Defendant in office with Attorney Gerald Neal, all appearing telephonically, pursuant to Administrative Orders for public safety. Court reviewed the history of the case. Attorney Jacobson represented the matter was reopened because of the child's broken arm and Defendant refused to provide Plaintiff with any information. Attorney Jacobson further represented Defendant provided her phone number at the hospital as Plaintiff's phone number and also did the same at the child's school. Defendant also denied Plaintiff with Facetime visitations, and when she found out about Plaintiff's motion, she filed a false TPO against him. Attorney Richards represented Defendant alleges that Plaintiff cut the battery cables out of her vehicle. Attorney Richards stated Defendant told Plaintiff about the child's broken arm and it was not serious. Attorney Richards further stated the child is enrolled in speech therapy, however Plaintiff has not taken the child to any appointment during his custodial time. Court noted the parties' agreements in the Decree of Custody and the parties should follow that agreement or it may provide reason to reopen the case. Extensive discussion was held regarding the child's school, exchanges and related issues. Court admonished the parties to follow the orders. COURT stated its FINDINGS and ORDERED the following: Plaintiff's MOTION to SET ASIDE and MODIFY shall be DENIED. Plaintiff's REQUEST to ENFORCE the AGREEMENTS to REQUIRE the DISCLOSURE of ADDRESS shall be GRANTED. Matter shall

CASE SUMMARY

CASE NO. D-20-609211-C

be CONTINUED to 7/7/2021 at 10:00 A.M. regarding the child's school issue. Attorney Neal shall prepare the Order, Attorney Jacobson shall review form and content.;

07/07/2021

Hearing (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Plaintiff's Reply to Opposition

Matter Heard;

07/07/2021



All Pending Motions (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

MINUTES

Matter Heard;

Journal Entry Details:

DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR SET ASIDE DECREE OF CUSTODY OR, IN THE ALTERNATIVE, MODIFY CUSTODY AND MOTION FOR REVIEW OF CHILD SUPPORT, FOR ORDER TO SHOW CAUSE, AND FOR RELATED RELIEF AND COUNTER MOTION TO CHANGE CUSTODY DUE TO CHANGE IN CIRCUMSTANCES AND FOR THE PLAINTIFF TO PAY FOR DAY CARE AND FOR ATTORNEY'S FEES (CONT FROM 5/19/2021)...PLAINTIFF'S REPLY TO OPPOSITION Defendant/Mom was present telephonically on Bluejeans. All other parties present appeared via video conference on Bluejeans. Mr. Neal stated he ordered the video to prepare the Order from the last hearing and will submit it to the Court. Discussion regarding how Plaintiff/Dad is listed on the child's school records, Dad's access issues with the school and teachers, no agreement to the child attending that school, the best interest of the child, police involvement, and Dad not being allowed to be involved in the child's life. Court NOTED the request to set aside the decree, the request for an Order to Show Cause, and the request to change custody were all denied at the May 19, 2021. This matter was continued to address the joint legal custody issues Dad had with the pre-school. Further discussion regarding the pre-school denying Dad access to the child's records and Dad's attempts to resolve the matter. The Court clarified the Orders from the May 19, 2021 hearing. Further discussion regarding the Court's findings of no adequate cause for an Evidentiary Hearing. Ms. Jacobson stated Dad has been denied his Facetime with the child. Further discussion regarding the same. COURT stated its FINDINGS and ORDERED the following: The ORDER from the May 19, 2021 hearing shall be prepared and served on the child's PRE-SCHOOL. Dad has a right to be treated as a joint legal custodian, to be included on the pre-school records, and to have access to the pre-school's information. The pre-school is expected to treat Dad the same way they treat Mom and It is Mom's responsibility to fix the relationship between Dad and the school. If there is no improvement after the Order has been served on the pre-school and it is not in the best interest for the child to be at that pre-school, Dad may file a request for the Court to order a different child care facility. Dad does NOT have to take the child to the PRE-SCHOOL during his custodial time. The Court is NOT going to Order the child cannot attend the pre-school during Mom's custodial time. The COMMUNICATION between the parties on Talking Parents is not to be used to argue; its notice regarding the child and how the child is doing. Mr. Neal shall PREPARE the Order from today's hearing. If the orders from the May 19, 2021 and today's hearings are combined, the caption shall include both hearing dates.;

11/08/2021

Motion (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

11/08/2021, 11/10/2021, 11/17/2021

Plaintiff's Motion For An Order To Show Cause, To Modify Custody And Related Relief, And For Attorney's Fees And Costs Comes Now Plaintiff, Henry E. Gaar

Matter Continued;

Matter Continued;

Evidentiary Hearing;

Matter Continued;

Matter Continued;

Evidentiary Hearing;

Matter Continued;

Matter Continued;

Evidentiary Hearing;

11/08/2021

Opposition & Countermotion (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

11/08/2021, 11/10/2021, 11/17/2021

Defendant's Opposition To Plaintiff's Motion For An Order To Show Cause, To Modify Custody And Related Relief, And For Attorney's Fees And Costs, And Defendant's Countermotion For Attorney's Fees And Other Related Relief

Matter Continued;

Matter Continued;

Evidentiary Hearing;

Set in error

Matter Continued;




Matter Continued;

Evidentiary Hearing;

Set in error

CASE SUMMARY

CASE NO. D-20-609211-C

	<p>Matter Continued; Matter Continued; Evidentiary Hearing; Set in error</p>
11/08/2021	<p>Hearing (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.) 11/08/2021, 11/10/2021, 11/17/2021 <i>Reply to Opposition</i> Matter Continued; Matter Continued; Evidentiary Hearing; Matter Continued; Matter Continued; Evidentiary Hearing; Matter Continued; Matter Continued; Evidentiary Hearing;</p>
11/08/2021	<p> All Pending Motions (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.) Matter Heard; Journal Entry Details: PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS...DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS, AND DEFENDANT'S COUNTERMOTION FOR ATTORNEY'S FEES AND OTHER RELATED RELIEF...REPLY TO OPPOSITION Prior to Court, an incident occurred at the Regional Justice Center that required the Court and staff to evacuate the building and the Court was unable to hear the matter; therefore, COURT ORDERED; matter CONTINUED TO 11/10/21 @ 10:00 A.M.;</p>
11/10/2021	<p>Motion (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.) <i>Motion to Withdraw as Counsel of Record for Defendant</i> Granted; Set In Error</p>
11/10/2021	<p> All Pending Motions (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.) Matter Heard; Journal Entry Details: MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANT...REPLY TO OPPOSITION...DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS, AND DEFENDANT'S COUNTERMOTION FOR ATTORNEY'S FEES AND OTHER RELATED RELIEF...PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS Prior to Court, the Court's staff contacted attorney Isso and counsel stated that she was between hearings in two departments and was unable to attend this hearing. The Court noted that the matter was re-set to today do to an incident at the RJC on 11/8/21 wherein the Courthouse was evacuated and the Court was unable to hear the matter as set that day. The COURT FINDS good cause to continue the matter. COURT ORDERED: Attorney Neal has substituted out as Attorney of Record for Defendant and attorney Isso is Defendant's attorney. Attorney Neal's motion is GRANTED and although the matter is moot, if counsel wishes to submit an Order he may do so. Matter CONTINUED TO 11/17/21 @ 10:00 A.M. ;</p>
11/17/2021	<p> All Pending Motions (10:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.) Matter Heard; Journal Entry Details: PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS...DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS, AND DEFENDANT'S COUNTERMOTION FOR ATTORNEY'S FEES AND OTHER RELATED RELIEF...REPLY TO OPPOSITION Both counsel and both parties appeared by Bluejeans technology. The Court reviewed the case. Argument by counsel. Discussion by the Court regarding the conflict between the parties and the contract that the parties had entered into that were are not following. There COURT FINDS that there is adequate cause to have a hearing to modify the parties' stipulated custody decree. The Court admonished both parties to follow the Court Orders. COURT ORDERED: Both parties are admonished to follow the Court's Orders. The Order entered and filed on 10/4/21 is still applicable and the parties are to follow it. Both counsel shall have 20 days of today's date to have leave to file amendments to their pleadings to cure</p>

CASE SUMMARY

CASE NO. D-20-609211-C

whatever procedural defects there are with respect to modifying or enforcing the Order and that are expressly related to the relief that the parties are requesting at the evidentiary hearing. Counsel shall do so by 12/7/21. Discovery Cut-off is Friday 1/14/22. Evidentiary Hearing SET for 2/1/22 @ 1:30 P.M. ;

02/01/2022



Evidentiary Hearing (1:30 PM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Matter Continued;

Journal Entry Details:

EVIDENTIARY HEARING Attorney Jacobson and Plaintiff appeared by Bluejeans technology. Attorney Isso and Defendant appeared in the Courtroom. The Court reviewed the case. **COURT ORDERED**; attorney Jacobson's request to continue the matter so that she and Plaintiff could appear in person is **DENIED**. The Court **FINDS** no good cause and no merit to continue the matter. Opening statements by counsel. Witnesses and exhibits per worksheets. **COURT ORDERED**: The Non-Jury Trial shall be **CONTINUED**. The Court's staff shall notify counsel of the continuance date as soon as a date is determined. ;

02/02/2022



Hearing (1:00 PM) (Judicial Officer: Young, Jay)

OST; RE: MOTION TO COMPEL DISCOVERY

Matter Heard;

Journal Entry Details:

HEARING: OST; RE: MOTION TO COMPEL DISCOVERY. In the interest of public safety due to the Coronavirus pandemic, the matter was heard via VIDEO CONFERENCE through the BlueJeans application. **COURT NOTED** that there was not an opposition filed. Ms. Isso states that there was no opposition filed and would like to resolve the issues without an opposition. Ms. Jacobson states that on December 16, 2021, we noticed Defendant's deposition also on January 12, 2022, and on that date, Defendant did not show up for the deposition. It was rescheduled for January 14, 2022. Defendant and her attorney refused to appear in person, so it was held on Zoom. Defendant refused to turn on her camera, so it was taken by audio-only. During the deposition, Defendant was asked to read some answers from her phone because she claimed she could not recollect many responses to many questions. Ms. Isso told her client not to read from her phone. Then it was asked of the Court to sit in on the deposition, and before the Court entered, Defendant, stated that her cell phone no longer worked. The deposition was continued until January 18, 2022. Ms. Isso states that Ms. Jacobsen was only supposed to ask her client the three (3) questions that she did not get to ask her when the cell phone had died, not redo the whole deposition. **COURT NOTED** that there was not any production of documents. Ms. Isso states that if something was missing, Ms. Jacobsen could have contacted her. Ms. Jacobsen states that she did reach out to Ms. Isso. **COMMISSIONER** stated its **FINDINGS** and **RECOMMENDATIONS**: 1. Motion shall be **GRANTED**. Ms. Jacobsen is allowed to ask any missing questions or natural follow-up. Defendant must appear on video, and if she can not, she must appear at Ms. Jacobsen's office or appear at a deposition suite which she shall bear the cost. 2. The Court **FINDS** that Ms. Isso's behavior at the last deposition was **REPUGNANT** and **UNPROFESSIONAL**. She was rude and not appropriate, and she impeded the fair examination of the witness and counsel's ability to ask simple foundational questions. Ms. Isso shall be personally **SANCTIONED** under rules 37d and 30d2 in the amount of \$1000.00 payable to **LEGAL AID** of **SOUTHERN NEVADA**. This must be paid and proof of payment by February 14, 2022. 3. Motion shall be **GRANTED** for production of documents and interrogatories. There was a false certification filed by Ms. Isso's office regarding the production of documents. Also, regarding the production of documents and interrogatories, there are attempts to answer but only referred to 16.2 disclosures that must provide the bates range as to each. Answers to interrogatories can not be N/A is not appropriate. The answer must be articulated yes or no or provide a narrative. The motion is **GRANTED** for interrogatories 6,7,8,10,12,14,16,22,26,27,28. 4. The objections are **WAIVED** as **UNTIMELY**. Second, regarding the objection, with a notable exception of request number one (1). Each of the remaining requests contains the same objection: objection, relevance, vague, ambiguous, and unduly burdensome. There was no effort to explain what was vague, how unduly burdensome. Each objection is **BOILERPLATE**. Objections need to have specificity. Therefore, the objections are tantamount to no objections at all, and had they not been waived already for being untimely, they would have been waived for being inappropriate. Moreover, Rule 26g requires that you certify that your answers align with the civil procedure when you sign a discovery pleading. 5. Regarding the false certification, Rule 26g requires the Court to **SANCTION** counsel. There shall be a separate **SANCTION** of \$500.00 pursuant to 26g. Payable to **LEGAL AID** of **SOUTHERN NEVADA** and shall be paid by February 14, 2022. 6. **ATTORNEY FEES** shall be **GRANTED**. Pursuant to Rule 37A 5A. In addition to the sanctions, that would include the cost of the first deposition and the costs for attorney fees regarding the second deposition and the costs and fees for this motion. An **INFERENCE** shall also be **GRANTED** that any documents, responses to interrogatories, request for production of documents, and failure to disclose 16.2 disclosures not made by February 14, 2022, for any all withheld information. The inference will be that the withheld information would not have supported Defendant's claim in this matter.;

04/12/2022



Objection (11:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)

Defendant's Objection To Discovery Commissioner's Report and Recommendations

Denied;

Journal Entry Details:

DEFENDANT'S OBJECTION TO DISCOVERY COMMISSIONER'S REPORT AND RECOMMENDATION In the interest of public safety due to the Coronavirus pandemic, all parties present appeared via video conference


CASE SUMMARY

CASE NO. D-20-609211-C

through the BlueJeans application. The Court reviewed the pending objection to the Discovery Commissioner's Report and Recommendation (DCRR). Argument by Ms. Isso regarding opposing counsel not holding a meet and confer regarding discovery or making good faith efforts to meet and confer, not being served with the exhibits referenced in the motion to compel, the sanctions recommended against her without notice it was a sanction hearing, alleged ex-parte communication between Ms. Jacobson and Commissioner Young, the deposition of Defendant, the Commissioner's abuse of discretion, and attorney's fees. Argument by Ms. Jacobson regarding inappropriate conduct of Ms. Isso, the Commissioner's sanctions against Ms. Isso, evidence provided regarding attempts to meet and confer, production of documents, misrepresentations regarding the request for sanctions, the video exhibits she inadvertently failed to serve on Ms. Isso, and she denied any ex-parte communications with Commissioner Young. The Court is not evaluating the merits of the case; this is a review of the recommendation of a judicial officer regarding Plaintiff's motion to compel. The Discovery Commissioner is vested with judicial authority pursuant to NRCP 53. In this matter there was a motion filed, a hearing was held, and there was a written Report and Recommendation to which Defendant timely objected to. COURT ORDERED Defendant's OBJECTION is DENIED as there has been no violation of due process rights, there is no merit to the objection to the recommendations made, it was within the Commissioner's discretion, there was sufficient proof, and it was not clearly erroneous. The Discovery Commissioner's Report and Recommendation shall be signed and filed by the Court.;

04/13/2022 CANCELED **Objection** (1:00 PM) (Judicial Officer: Young, Jay)
Vacated

04/13/2022 CANCELED **Motion** (1:00 PM) (Judicial Officer: Ritchie, T. Arthur, Jr.)
Vacated
Defendant s Opposition To Plaintiff s Memorandum Of Fees And Costs Et. Al And Motion To Strike
Memorandum
04/12/2022 Reset by Court to 04/13/2022

04/20/2022  **Minute Order** (8:30 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)
Minute Order - No Hearing Held;
Journal Entry Details:
MINUTE ORDER: NO HEARING HELD, NO PARTIES PRESENT IT IS HEREBY ORDERED that due to the Court's schedule, the above-entitled case currently set for Trial on April 21, 2022 at from 9:00 a.m. to 12:00 p.m. has been reset to begin on the 2nd day of June, 2022, at the hour of 9:00 a.m. for three (3) hours, at the Regional Justice Center, 200 Lewis Avenue, Courtroom 3G, Las Vegas, Nevada. CLERK'S NOTE: a copy of this Minute Order was e-mailed to Plaintiff's attorney and mailed to Defendant at her physical address on file with the Court. (4/20/2022 TC);

04/27/2022 **Status Check** (1:30 PM) (Judicial Officer: Young, Jay)
Compliance with Order Discovery

06/02/2022 **Evidentiary Hearing** (9:00 AM) (Judicial Officer: Ritchie, T. Arthur, Jr.)
Day 2
04/21/2022 Reset by Court to 06/02/2022

SERVICE

06/19/2020 **Summons**
Daniels, Traketra
Served: 07/05/2020

Heather S. Smith
CLERK OF THE COURT

1 ORDER

2
3
4 EIGHTH JUDICIAL DISTRICT COURT

5 CLARK COUNTY, NEVADA

6
7
8 HENRY E. GAAR,

Case No.: D-20-609211-C

9 Plaintiff,

10 vs.

Dept. No. H / Discovery

11 TRAKATRA DANIELS,

12 Defendant

13
14
15 ORDER ON DISCOVERY COMMISSIONER'S REPORT AND
16 RECOMMENDATIONS

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

19 _____ No timely objection having been filed,

20 *JHE* After reviewing the objection to the Report and
21 Recommendation's and good cause appearing,

22 AND

23 *JHE* IT IS HEREBY ORDERED the Discovery Commissioner's
24 Report and Recommendations are affirmed and adopted.

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

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

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

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

5 Set for the ____ day of _____, 2022 at ____ a.m. / p.m.

6 Dated this 12th day of April, 2022

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10 509 F7A F046 3F0D
11 T. Arthur Ritchie
12 District Court Judge
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1 DCRR

2
3 DISTRICT COURT, FAMILY DIVISION
4 CLARK COUNTY, NEVADA

5 HENRY E GAAR,

6 Plaintiff,

7 vs.

8 TRAKETRA DANIELS,

9 Defendant.

Case No.: D-20-609211-C

Dept. No. H

10
11 **DISCOVERY COMMISSIONER'S REPORT AND RECOMMENDATIONS**

12 Hearing Date: February 2, 2022.

13 Hearing Time: 1:00 p.m.

14 Attorney for Plaintiff: Rachel M. Jacobson, Esq.

15 Attorney for Defendant: Jennifer Isso, Esq.

16
17 **I. FINDINGS**

18 On February 2, 2021, the parties to the above-captioned matter appeared telephonically before the
19 Honorable Discovery Commissioner Jay Young on PLAINTIFF'S MOTION FOR TO [sic] COMPEL
20 DEFENDANT'S COMPLIANCE WITH DISCOVERY, FOR ADVERSE INERERNCES [sic] AND
21 SANCTIONS FOR HER FAILURE TO COMPLY WITH DISCOVERY, AND FOR ATTORNEY'S
22 FEES AND RELATED RELIEF (The "Motion"). Upon the Court's review of the Motion and all other
23 pleadings and papers on file with this court, and oral arguments made by counsel, and for good cause
24 appearing, the Discovery Commissioner hereby makes the following findings:
25

26 Plaintiff served his first request for Production of Documents on Defendant on December 14,
27 2021. Plaintiff served his first request for Interrogatories on Defendant on December 14, 2021.
28

1 In response to the Interrogatories, Defendant generally refused to answer, only asserting a
2 reference to her 16.2 production of documents without fully answering each question. Defendant must
3 provide the bates range as to each answer; she must also provide an answer of “yes” or “no” or include
4 a narrative where appropriate instead of providing an answer of “n/a.”

5 Defendant’s objections to Plaintiff’s Request for Production of documents were untimely and
6 thus waived. Further, Defendant did not provide any documents and, with the notable exception to
7 Request number 1, Defendant asserted the same boilerplate objection in response to each of Plaintiff’s
8 Request for Production of Documents. Defendant must supplement all responses to Plaintiff’s Request
9 for Production of Documents.

10 When responding to discovery requests, one must provide information that is fairly sought
11 under the Rule 26(b)(1) standard. Objections not stated with specificity are boilerplate.¹

12 The word “boilerplate” refers to “trite, hackneyed writing”—an appropriate definition in
13 light of how boilerplate objections are used. An objection to a discovery Request is
14 boilerplate when it merely states the legal grounds for the objection without (1)
15 specifying how the discovery Request is deficient and (2) specifying how the objecting
16 party would be harmed if it were forced to respond to the Request.

17 Matthew L. Jarvey, *Boilerplate Discovery Objections: How They are Used, Why They are Wrong, and*
18 *What We Can Do About Them*, 61 Drake L. Rev. 913, 914 (2013) (internal citations omitted).

19 By rule, Nevada has declared boilerplate objections are inappropriate. NRCP 33(b)(4) (“The
20 grounds for objecting to an interrogatory must be stated with specificity”); NRCP 34(b)(2)(B) (One
21 must “state the ground for objecting to the Request, with specificity, including the reasons”).

22 Further, the practice of interjecting a boilerplate objection was inappropriate even before it was
23 explicitly prohibited by the most recent amendments to the NRCP. *Olivarez v. Rebel Oil Company, et*
24 *al.*, Discovery Commissioner Opinion #11 (April, 2003) (“Meeting the burden of asserting a proper

25 ¹ See, e.g., *Fischer v. Forrest*, No. 14 Civ. 01304, 2017 WL 773694 (S.D.N.Y. Feb. 28, 2017) (Any discovery response that
26 does not comply with Rule 34’s requirement to state objections with specificity (and to clearly indicate whether responsive
27 material is being withheld on the basis of objection) will be deemed a waiver of all objections (except as to privilege)). The
28 Nevada Supreme Court recognizes federal decisions involving the Federal Rules of Civil Procedure provide strong
persuasive authority. *Exec. Mgmt. Ltd. v. Ticor Title Ins. Co.*, 118 Nev. 46, 38 P.3d 872 (2002). This recognition became
even more important after the Supreme Court approved the “comprehensive” March 1, 2019 Amendments to the Nevada
Rules of Civil Procedure. The 2019 Nevada Rules of Civil Procedure are modeled in large part “on the 2018 version of the
Federal Rules of Civil Procedure”. Advisory Committee Note—2019 Amendments Preface.

1 discovery objection entails more than the ritual recital of boilerplate verbiage to each discovery
2 Request”);² *Partner Weekly, LLC v. Viable Mktg. Corp.*, No. 2:09-CV-2120-PMP-VCF, 2014 WL
3 1577486, at *2 (D. Nev. Apr. 17, 2014) (citing *Walker v. Lakewood Condo. Owners Ass’n*, 186 F.R.D.
4 584, 587 (C.D. Cal.1999)) (“Boilerplate and generalized objections are inadequate and tantamount to
5 no objection at all”). Yet, the outdated practice persists.

6 One federal court suggested that tread worn objections – that the request is over burdensome or
7 overbroad – are boilerplate unless they also answer “Why is it burdensome? How is it overly broad?”
8 *Fischer v. Forrest*, No. 14 Civ. 1304 (PAE) (AJP), 2017 WL 773694, (S.D.N.Y. Feb. 28, 2017). The
9 court then warned future litigants that “[f]rom now on in cases before this Court, any discovery
10 response that does not comply with Rule 34’s requirement...will be deemed a waiver of all objections
11 (except as to privilege).” *Id.* Similarly, the court in *Liguria Foods, Inc. v. Griffith Labs., Inc.*, 320
12 F.R.D. 168, 170 n.1 (N.D. Iowa 2017) suggested that failure to “show specifically how” the requests
13 were “not relevant” or “overly broad, burdensome or oppressive,” violates the rules’ specificity
14 requirement and renders the objection boilerplate.

15 Defendant’s objections are tantamount to no objection at all and, had they not been waived as
16 untimely, they would have been deemed waived as being inappropriate. Therefore, each of the
17 referenced boilerplate objections is waived.

18 All counsel certify to the Court pursuant to NRCP 26(g) that their discovery responses are
19 consistent with the rules (including their prohibition against boilerplate objections) and warranted by
20 law. This certification functions the same as the more-familiar Rule 11 certification—it is
21 automatically made by signing a discovery request, response, or pleading.

22 Rule 26(g)(1) reads:

23 By signing, an attorney or party certifies that to the best of the person’s knowledge,
24 information, and belief formed after a reasonable inquiry:

25

26 ² See also *Albourn v. Koe, M.D., et al.*, Discovery Commissioner Opinion #10 (November 2001) (citing *Pleasants*
27 *v. Allbaugh*, 2002 U.S. Dist. Lexis 8941 (D. D.C. 2002); *G-69 v. Degnan*, 130 F.R.D. 326 (D. N.J. 1990); *Josephs v. Harris*
28 *Corp.*, 677 F.2d 985 (3d Cir. 1982)). (“Repeating the familiar phrase that each request is ‘vague, ambiguous, overly broad,
unduly burdensome and oppressive, not relevant nor calculated to lead to the discovery of admissible evidence and, further,
seeks material protected by the attorney/client or other privilege and the work product doctrine’ is insufficient. . . . The
burden is on the party resisting discovery to clarify and explain precisely why its objections are proper given the broad and
liberal discovery rules.”).

1 (B) *with respect to a discovery Request, response, or objection*, it is:
2 (i) consistent with these rules and warranted by existing law or by a
3 nonfrivolous argument for extending, modifying, or reversing existing law, or for
4 establishing new law;
5 (ii) not interposed for any improper purpose, such as to harass, cause
6 unnecessary delay, or needlessly increase the cost of litigation; and
7 (iii) neither unreasonable nor unduly burdensome or expensive, considering the
8 needs of the case, prior discovery in the case, the amount in controversy, and the
9 importance of the issues at stake in the action.

10 Emphasis added.

11 Further, the rule makes a sanction mandatory when counsel “violates this rule without
12 substantial justification.” Rule 26(g)(3). Therefore, when coupled with counsel’s automatic
13 certification under NRCP 26(g), one who makes a non-tailored, overbroad or overly burdensome
14 discovery request, makes a boilerplate objection, or files a pleading in support of the same, is subject to
15 *mandatory* sanctions. NRCP 26(g)(3).

16 Defendant’s counsel made a false certification regarding the Requests for Production of
17 Documents. Having given Ms. Isso an opportunity to explain her discovery responses, the Court finds
18 that Ms. Isso’s certification was false without good reason or justification.

19 With regard to the Deposition of the Defendant, while the Commissioner previously limited the
20 questioning to those questions that counsel was not able to get the answer for at the earlier deposition
21 because the Defendant’s phone was not working, the Commissioner did not limit Plaintiff’s questions to
22 three questions. Moreover, foundational and follow-up questions are appropriate.

23 The Court finds Ms. Isso’s behavior at Defendant’s deposition was repugnant and
24 unprofessional. She behaved in a rude manner to opposing counsel, calling her “honey” in a derogatory
25 manner, screaming, interrupting counsel, refusing to allow Plaintiff’s counsel to examine Defendant,
26 and using the four letter copulative. Further, Ms. Isso improperly instructed Defendant to refuse to
27 answer Plaintiff’s counsel’s questions, after which Ms. Isso improperly terminated the deposition
28 without justification and without immediately seeking a protective order as required. Ms. Isso impeded
the fair examination of Defendant, as well as Plaintiff’s counsel’s ability to ask simple, foundational
questions. At the hearing, Ms. Isso defended her deposition behavior as appropriate, making the
repugnant behavior the more alarming.

1 **II. RECOMMENDATIONS**

2 **IT IS HEREBY RECOMMENDED** that Plaintiff's Motion to Compel be granted. Defendant
3 must supplement responses to all Interrogatories, Requests for Production of Documents, and Rule 16.2
4 mandatory disclosures at issue herein. Further, Defendant must sit for an additional deposition consistent
5 with the recommendations herein.

6 **IT IS FURTHER RECOMMENDED** that, where the Defendant asserted only a reference to her
7 16.2 production of documents in her answers to Plaintiff's Interrogatories, she must provide the bates
8 range as to each answer.

9 **IT IS FURTHER RECOMMENDED** that Defendant must also provide an answer of "yes" or
10 "no" or include a narrative where appropriate to Interrogatories to which she previously answered "n/a."
11 Defendant shall supplement her response to Interrogatories No. 6, 7, 8, 10, 12, 14, 16, 22, 26, 27, and 28.

12 **IT IS FURTHER RECOMMENDED** that Plaintiff shall be allowed to depose Defendant for
13 the third time at which time the Plaintiff is permitted to ask the questions Defendant was unable or
14 unwilling to answer at the first deposition. Plaintiff may also ask any natural follow up questions
15 regarding any new information Defendant's answers may provide.

16 **IT IS FURTHER RECOMMENDED** that Defendant must appear by video if she does not wish
17 to appear in person. Because this is the third attempt to depose Defendant, and because of Defendant's
18 inability or refusal to appear on video or in person for prior depositions, Defendant must now appear for
19 her deposition either at the Jacobson Law Office or she must appear at a deposition suite (with the cost of
20 the same to be paid by Defendant).

21 **IT IS FURTHER RECOMMENDED** that Defendant shall bear the costs associated with the
22 third Deposition taken of Defendant by Plaintiff.

23 **IT IS FURTHER RECOMMENDED** that, with regard to the Interrogatories and the Request
24 for Production of Documents, the Motion is granted. The objections are waived as untimely and
25 inappropriate.

26 **IT IS FURTHER RECOMMENDED** that Defendant shall provide supplemental responses to
27 Plaintiff's Request for Interrogatories, specifically Interrogatories No. 6, 7, 8, 10, 12, 14, 16, 22, 26, 27,
28 and 28. Said supplement shall be made on or before February 14, 2022.

1 **IT IS FURTHER RECOMMENDED** that as it relates to any discovery compelled herein that is
2 not provided by February 14, 2022, or any information that is otherwise withheld, an adverse inference
3 that any withheld information would not have supported Defendant's position will automatically issue.

4 **IT IS FURTHER RECOMMENDED** that Counsel for Defendant, Ms. Isso, be personally
5 sanctioned pursuant to Rule 37(d) and Rule 30(d)(2) in the amount of \$1,000.00, which amount is to be
6 made payable to the Legal Aid Center of Southern Nevada. Ms. Isso shall remit such payment and provide
7 proof of said payment to this Court by February 14, 2022 to avoid further sanction.

8 **IT IS FURTHER RECOMMENDED** that Counsel for Defendant, Ms. Isso, be personally
9 sanctioned pursuant to mandatory Rule 26(g) sanction in the amount of \$500.00, which mount is to be
10 made payable to the Legal Aid Center of Southern Nevada. Ms. Isso shall remit such payment and provide
11 proof of said payment to this Court by February 14, 2022 to avoid further sanction.

12 **IT IS FURTHER RECOMMENDED** that Plaintiff's request for attorney's fees and costs should
13 be granted pursuant to NRCP 37(a)(5) in addition to the sanctions. Plaintiff should be awarded his costs
14 as it relates to the first deposition and should be awarded his costs and attorney's fees as it relates to the
15 second Deposition. Likewise, Plaintiff should be awarded his attorney's fees and costs associated with
16 his Motion to Compel and all efforts made to meet and confer regarding the same. Plaintiff shall submit
17 a Memorandum of Fees and Costs. Plaintiff must submit a Memorandum of Fees and Costs consistent
18 with *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 455 P.2d 31 (1969); *Beattie v. Thomas*, 99 Nev.
19 579, 668 P.2d 268 (1983); and *Wright v. Osburn*, 114 Nev. 1367, 1370, 970 P.2d 1071, 1073 (1998) on
20 or before March 1, 2022. Defendant may file an opposition thereto on or before March 8, 2022. No late
21 submission will be considered.

22 **IT IS FURTHER RECOMMENDED** that adverse inferences shall be entered against the
23 Defendant that any and all documents, any and all responses to Interrogatories, and Request for Production
24 of documents and failure to make 16.2 disclosures not made by February 14, 2022 or any and all withheld
25 information; the inference shall be that the withheld information would not have supported the
26 Defendant's claim in this matter. The exact wording of this inference shall be up to the District Court at
27 the time of the trial in this matter.

IT IS FURTHER RECOMMENDED that this court will hold a status hearing on March 16, 2022 at 1:30 P.M. regarding Ms. Isso's compliance with these recommendations and to determine the amount of attorney's fees awarded to Plaintiff.

Dated: February 22, 2022

Tae Young
DISCOVERY COMMISSIONER

Case No.: D-20-609211-C

1
2
3 **EIGHTH JUDICIAL DISTRICT COURT**
4 **CLARK COUNTY, NEVADA**
5

6
7 HENRY E. GAAR,
8 Plaintiff,

Case No.: D-20-609211-C

9
10 vs.

Dept. No.: H / Discovery

11 TRAKATRA DANIELS,
12 Defendant
13
14

15 **NOTICE**

16 Pursuant to NRCP 16.3(c)(2), you are hereby notified that within
17 fourteen (14) days of being served with a report, any party may file and serve
18 written objections to the recommendations. Written authorities may be filed with
19 an objection, but are not mandatory. If written authorities are filed, any other party
20 may file and serve responding party within seven (7) days after being served with
21 objections.
22
23

24 A copy of foregoing Discovery Commissioner's Report and
25 Recommendations was:
26
27
28

✓ Mailed to Plaintiff/Defendant on the 22ND day of FEB, 2022,
to the following address:

Jennifer Isso, Esq.
Isso & Hughes
2470 St. Rose Pkwy Ste. 306F
Henderson, NV 89074

✓ Electronically filed and served on the 22ND day of FEB, 2022

Rachel Jacobson, Esq. - reli@jacobsonlawltd.com

Jennifer Isso, Esq. - ji@issohugheslaw.com

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

Dated this 22ND day of FEB, 2022.

Tracy George
Commissioner Designee

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Henry E Gaar, Plaintiff.

CASE NO: D-20-609211-C

7 vs.

DEPT. NO. Department H

8 Traketra Daniels, 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: 4/12/2022

15 Gerald Neal

geraldfneal@aol.com

16 Rachel Jacobson

eservice@jacobsonlawltd.com

17 Jennifer Isso

ji@issohugheslaw.com

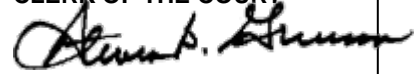
18 Jennifer Isso

info@lowestpricelawyers.com

19
20 If indicated below, a copy of the above mentioned filings were also served by mail
21 via United States Postal Service, postage prepaid, to the parties listed below at their last
known addresses on 4/13/2022

22 Jennifer Isso

2470 St. Rose PKWY STE 306F
Henderson, NV, 89074



1 **NEOJ**
2 RACHEL M. JACOBSON, ESQ.
3 Nevada Bar No. 7827
4 JACOBSON LAW OFFICE, LTD.
5 64 North Pecos Road, Suite 200
6 Henderson, Nevada 89074
7 PH: 702/601-0770
8 *Attorney for Plaintiff*

9
10 ***EIGHTH JUDICIAL DISTRICT COURT***
11 ***CLARK COUNTY, NEVADA***

12 HENRY GAAR,

13 Plaintiff,

14 vs.

15 TRAKETRA DANIELS,

16 Defendant.

Case No. **D-20-609211-C**
Dept. No. **H**

FAMILY DIVISION

NOTICE OF ENTRY OF
ORDER ON DISCOVERY
COMMISSIONER'S REPORT
AND RECOMMENDATIONS

17 **PLEASE TAKE NOTICE** that an ORDER ON DISCOVERY
18 COMMISSIONER'S REPORT AND RECOMMENDATIONS, attached hereto,
19 was duly entered in the above-referenced case on the 12th day of April 2022.

20
21 DATED this 12th day of April 2022.

22 *Respectfully Submitted by:*
23 JACOBSON LAW OFFICE, LTD

24 /s/ Rachel M. Jacobson, Esq.
25 RACHEL M. JACOBSON, ESQ.
26 Nevada Bar No. 007827
27 64 North Pecos Road, Suite 200
28 Henderson, Nevada 89074
(702) 601-0770

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of JACOBSON LAW OFFICE, LTD., and that on this 12th day of April 2022, I caused the above and foregoing document entitled *NOTICE OF ENTRY OF ORDER ON DISCOVERY COMMISSIONER'S REPORT AND RECOMMENDATIONS*, with the referenced *Order attached thereon*, to be served as follows:

☒ BY ELECTRONIC SERVICE: Pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D) and Administrative Order 14-2 captioned "In the Administrative Matter of Mandatory Electronic Service in the Eighth Judicial District Court," by mandatory electronic service through the Eighth Judicial District Court's electronic filing system;

☐ BY FACSIMILE: Pursuant to EDCR 7.26, I transmitted a copy of the foregoing document this date via facsimile;

☐ BY ELECTRONIC MAIL: Pursuant to EDCR 7.26, I transmitted a copy of the foregoing document this date via electronic mail;

☐ BY CERTIFIED MAIL: I placed a true copy thereof enclosed in a sealed envelope, return receipt requested.

To the party(s) listed below at the address, email address, and/or facsimile number indicated below:

Jennifer Isso, Esq.
ji@issohugheslaw.com

/s/ Carol Beitler, Legal Assistant

An employee of JACOBSON LAW OFFICE, LTD.

1 ORDER

2
3
4 EIGHTH JUDICIAL DISTRICT COURT

5 CLARK COUNTY, NEVADA

6
7
8 HENRY E. GAAR,

Case No.: D-20-609211-C

9 Plaintiff,

10 vs.

Dept. No. H / Discovery


11 TRAKATRA DANIELS,

12 Defendant


13
14
15 ORDER ON DISCOVERY COMMISSIONER'S REPORT AND
16 RECOMMENDATIONS

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

19 _____ No timely objection having been filed,

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

22 AND

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

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

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

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

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

5 Set for the ____ day of _____, 2022 at ____ a.m. / p.m.

6 Dated this 12th day of April, 2022

7 
8

9
10 509 F7A F046 3F0D
11 T. Arthur Ritchie
12 District Court Judge
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1 DCRR

2
3 DISTRICT COURT, FAMILY DIVISION
4 CLARK COUNTY, NEVADA

5 HENRY E GAAR,

Case No.: D-20-609211-C

Dept. No. H

6 Plaintiff,

7 vs.

8 TRAKETRA DANIELS,

9 Defendant.

10
11 **DISCOVERY COMMISSIONER'S REPORT AND RECOMMENDATIONS**

12 Hearing Date: February 2, 2022.

13 Hearing Time: 1:00 p.m.

14 Attorney for Plaintiff: Rachel M. Jacobson, Esq.

15 Attorney for Defendant: Jennifer Isso, Esq.

16
17 **I. FINDINGS**

18 On February 2, 2021, the parties to the above-captioned matter appeared telephonically before the
19 Honorable Discovery Commissioner Jay Young on PLAINTIFF'S MOTION FOR TO [sic] COMPEL
20 DEFENDANT'S COMPLIANCE WITH DISCOVERY, FOR ADVERSE INERERNCES [sic] AND
21 SANCTIONS FOR HER FAILURE TO COMPLY WITH DISCOVERY, AND FOR ATTORNEY'S
22 FEES AND RELATED RELIEF (The "Motion"). Upon the Court's review of the Motion and all other
23 pleadings and papers on file with this court, and oral arguments made by counsel, and for good cause
24 appearing, the Discovery Commissioner hereby makes the following findings:
25

26 Plaintiff served his first request for Production of Documents on Defendant on December 14,
27 2021. Plaintiff served his first request for Interrogatories on Defendant on December 14, 2021.
28

1 In response to the Interrogatories, Defendant generally refused to answer, only asserting a
2 reference to her 16.2 production of documents without fully answering each question. Defendant must
3 provide the bates range as to each answer; she must also provide an answer of “yes” or “no” or include
4 a narrative where appropriate instead of providing an answer of “n/a.”

5 Defendant’s objections to Plaintiff’s Request for Production of documents were untimely and
6 thus waived. Further, Defendant did not provide any documents and, with the notable exception to
7 Request number 1, Defendant asserted the same boilerplate objection in response to each of Plaintiff’s
8 Request for Production of Documents. Defendant must supplement all responses to Plaintiff’s Request
9 for Production of Documents.

10 When responding to discovery requests, one must provide information that is fairly sought
11 under the Rule 26(b)(1) standard. Objections not stated with specificity are boilerplate.¹

12 The word “boilerplate” refers to “trite, hackneyed writing”—an appropriate definition in
13 light of how boilerplate objections are used. An objection to a discovery Request is
14 boilerplate when it merely states the legal grounds for the objection without (1)
15 specifying how the discovery Request is deficient and (2) specifying how the objecting
16 party would be harmed if it were forced to respond to the Request.

17 Matthew L. Jarvey, *Boilerplate Discovery Objections: How They are Used, Why They are Wrong, and*
18 *What We Can Do About Them*, 61 Drake L. Rev. 913, 914 (2013) (internal citations omitted).

19 By rule, Nevada has declared boilerplate objections are inappropriate. NRCP 33(b)(4) (“The
20 grounds for objecting to an interrogatory must be stated with specificity”); NRCP 34(b)(2)(B) (One
21 must “state the ground for objecting to the Request, with specificity, including the reasons”).

22 Further, the practice of interjecting a boilerplate objection was inappropriate even before it was
23 explicitly prohibited by the most recent amendments to the NRCP. *Olivarez v. Rebel Oil Company, et*
24 *al.*, Discovery Commissioner Opinion #11 (April, 2003) (“Meeting the burden of asserting a proper

25 ¹ See, e.g., *Fischer v. Forrest*, No. 14 Civ. 01304, 2017 WL 773694 (S.D.N.Y. Feb. 28, 2017) (Any discovery response that
26 does not comply with Rule 34’s requirement to state objections with specificity (and to clearly indicate whether responsive
27 material is being withheld on the basis of objection) will be deemed a waiver of all objections (except as to privilege)). The
28 Nevada Supreme Court recognizes federal decisions involving the Federal Rules of Civil Procedure provide strong
persuasive authority. *Exec. Mgmt. Ltd. v. Ticor Title Ins. Co.*, 118 Nev. 46, 38 P.3d 872 (2002). This recognition became
even more important after the Supreme Court approved the “comprehensive” March 1, 2019 Amendments to the Nevada
Rules of Civil Procedure. The 2019 Nevada Rules of Civil Procedure are modeled in large part “on the 2018 version of the
Federal Rules of Civil Procedure”. Advisory Committee Note—2019 Amendments Preface.

1 discovery objection entails more than the ritual recital of boilerplate verbiage to each discovery
2 Request”);² *Partner Weekly, LLC v. Viable Mktg. Corp.*, No. 2:09-CV-2120-PMP-VCF, 2014 WL
3 1577486, at *2 (D. Nev. Apr. 17, 2014) (citing *Walker v. Lakewood Condo. Owners Ass’n*, 186 F.R.D.
4 584, 587 (C.D. Cal.1999)) (“Boilerplate and generalized objections are inadequate and tantamount to
5 no objection at all”). Yet, the outdated practice persists.

6 One federal court suggested that tread worn objections – that the request is over burdensome or
7 overbroad – are boilerplate unless they also answer “Why is it burdensome? How is it overly broad?”
8 *Fischer v. Forrest*, No. 14 Civ. 1304 (PAE) (AJP), 2017 WL 773694, (S.D.N.Y. Feb. 28, 2017). The
9 court then warned future litigants that “[f]rom now on in cases before this Court, any discovery
10 response that does not comply with Rule 34’s requirement...will be deemed a waiver of all objections
11 (except as to privilege).” *Id.* Similarly, the court in *Liguria Foods, Inc. v. Griffith Labs., Inc.*, 320
12 F.R.D. 168, 170 n.1 (N.D. Iowa 2017) suggested that failure to “show specifically how” the requests
13 were “not relevant” or “overly broad, burdensome or oppressive,” violates the rules’ specificity
14 requirement and renders the objection boilerplate.

15 Defendant’s objections are tantamount to no objection at all and, had they not been waived as
16 untimely, they would have been deemed waived as being inappropriate. Therefore, each of the
17 referenced boilerplate objections is waived.

18 All counsel certify to the Court pursuant to NRCP 26(g) that their discovery responses are
19 consistent with the rules (including their prohibition against boilerplate objections) and warranted by
20 law. This certification functions the same as the more-familiar Rule 11 certification—it is
21 automatically made by signing a discovery request, response, or pleading.

22 Rule 26(g)(1) reads:

23 By signing, an attorney or party certifies that to the best of the person’s knowledge,
24 information, and belief formed after a reasonable inquiry:

25

26 ² See also *Albourn v. Koe, M.D., et al.*, Discovery Commissioner Opinion #10 (November 2001) (citing *Pleasants*
27 *v. Allbaugh*, 2002 U.S. Dist. Lexis 8941 (D. D.C. 2002); *G-69 v. Degnan*, 130 F.R.D. 326 (D. N.J. 1990); *Josephs v. Harris*
28 *Corp.*, 677 F.2d 985 (3d Cir. 1982)). (“Repeating the familiar phrase that each request is ‘vague, ambiguous, overly broad,
unduly burdensome and oppressive, not relevant nor calculated to lead to the discovery of admissible evidence and, further,
seeks material protected by the attorney/client or other privilege and the work product doctrine’ is insufficient. . . . The
burden is on the party resisting discovery to clarify and explain precisely why its objections are proper given the broad and
liberal discovery rules.”).

1 (B) *with respect to a discovery Request, response, or objection*, it is:
2 (i) consistent with these rules and warranted by existing law or by a
3 nonfrivolous argument for extending, modifying, or reversing existing law, or for
4 establishing new law;
5 (ii) not interposed for any improper purpose, such as to harass, cause
6 unnecessary delay, or needlessly increase the cost of litigation; and
7 (iii) neither unreasonable nor unduly burdensome or expensive, considering the
8 needs of the case, prior discovery in the case, the amount in controversy, and the
9 importance of the issues at stake in the action.

10 Emphasis added.

11 Further, the rule makes a sanction mandatory when counsel “violates this rule without
12 substantial justification.” Rule 26(g)(3). Therefore, when coupled with counsel’s automatic
13 certification under NRCP 26(g), one who makes a non-tailored, overbroad or overly burdensome
14 discovery request, makes a boilerplate objection, or files a pleading in support of the same, is subject to
15 *mandatory* sanctions. NRCP 26(g)(3).

16 Defendant’s counsel made a false certification regarding the Requests for Production of
17 Documents. Having given Ms. Isso an opportunity to explain her discovery responses, the Court finds
18 that Ms. Isso’s certification was false without good reason or justification.

19 With regard to the Deposition of the Defendant, while the Commissioner previously limited the
20 questioning to those questions that counsel was not able to get the answer for at the earlier deposition
21 because the Defendant’s phone was not working, the Commissioner did not limit Plaintiff’s questions to
22 three questions. Moreover, foundational and follow-up questions are appropriate.

23 The Court finds Ms. Isso’s behavior at Defendant’s deposition was repugnant and
24 unprofessional. She behaved in a rude manner to opposing counsel, calling her “honey” in a derogatory
25 manner, screaming, interrupting counsel, refusing to allow Plaintiff’s counsel to examine Defendant,
26 and using the four letter copulative. Further, Ms. Isso improperly instructed Defendant to refuse to
27 answer Plaintiff’s counsel’s questions, after which Ms. Isso improperly terminated the deposition
28 without justification and without immediately seeking a protective order as required. Ms. Isso impeded
the fair examination of Defendant, as well as Plaintiff’s counsel’s ability to ask simple, foundational
questions. At the hearing, Ms. Isso defended her deposition behavior as appropriate, making the
repugnant behavior the more alarming.

1 **II. RECOMMENDATIONS**

2 **IT IS HEREBY RECOMMENDED** that Plaintiff's Motion to Compel be granted. Defendant
3 must supplement responses to all Interrogatories, Requests for Production of Documents, and Rule 16.2
4 mandatory disclosures at issue herein. Further, Defendant must sit for an additional deposition consistent
5 with the recommendations herein.

6 **IT IS FURTHER RECOMMENDED** that, where the Defendant asserted only a reference to her
7 16.2 production of documents in her answers to Plaintiff's Interrogatories, she must provide the bates
8 range as to each answer.

9 **IT IS FURTHER RECOMMENDED** that Defendant must also provide an answer of "yes" or
10 "no" or include a narrative where appropriate to Interrogatories to which she previously answered "n/a."
11 Defendant shall supplement her response to Interrogatories No. 6, 7, 8, 10, 12, 14, 16, 22, 26, 27, and 28.

12 **IT IS FURTHER RECOMMENDED** that Plaintiff shall be allowed to depose Defendant for
13 the third time at which time the Plaintiff is permitted to ask the questions Defendant was unable or
14 unwilling to answer at the first deposition. Plaintiff may also ask any natural follow up questions
15 regarding any new information Defendant's answers may provide.

16 **IT IS FURTHER RECOMMENDED** that Defendant must appear by video if she does not wish
17 to appear in person. Because this is the third attempt to depose Defendant, and because of Defendant's
18 inability or refusal to appear on video or in person for prior depositions, Defendant must now appear for
19 her deposition either at the Jacobson Law Office or she must appear at a deposition suite (with the cost of
20 the same to be paid by Defendant).

21 **IT IS FURTHER RECOMMENDED** that Defendant shall bear the costs associated with the
22 third Deposition taken of Defendant by Plaintiff.

23 **IT IS FURTHER RECOMMENDED** that, with regard to the Interrogatories and the Request
24 for Production of Documents, the Motion is granted. The objections are waived as untimely and
25 inappropriate.

26 **IT IS FURTHER RECOMMENDED** that Defendant shall provide supplemental responses to
27 Plaintiff's Request for Interrogatories, specifically Interrogatories No. 6, 7, 8, 10, 12, 14, 16, 22, 26, 27,
28 and 28. Said supplement shall be made on or before February 14, 2022.

1 **IT IS FURTHER RECOMMENDED** that as it relates to any discovery compelled herein that is
2 not provided by February 14, 2022, or any information that is otherwise withheld, an adverse inference
3 that any withheld information would not have supported Defendant's position will automatically issue.

4 **IT IS FURTHER RECOMMENDED** that Counsel for Defendant, Ms. Isso, be personally
5 sanctioned pursuant to Rule 37(d) and Rule 30(d)(2) in the amount of \$1,000.00, which amount is to be
6 made payable to the Legal Aid Center of Southern Nevada. Ms. Isso shall remit such payment and provide
7 proof of said payment to this Court by February 14, 2022 to avoid further sanction.

8 **IT IS FURTHER RECOMMENDED** that Counsel for Defendant, Ms. Isso, be personally
9 sanctioned pursuant to mandatory Rule 26(g) sanction in the amount of \$500.00, which mount is to be
10 made payable to the Legal Aid Center of Southern Nevada. Ms. Isso shall remit such payment and provide
11 proof of said payment to this Court by February 14, 2022 to avoid further sanction.

12 **IT IS FURTHER RECOMMENDED** that Plaintiff's request for attorney's fees and costs should
13 be granted pursuant to NRCP 37(a)(5) in addition to the sanctions. Plaintiff should be awarded his costs
14 as it relates to the first deposition and should be awarded his costs and attorney's fees as it relates to the
15 second Deposition. Likewise, Plaintiff should be awarded his attorney's fees and costs associated with
16 his Motion to Compel and all efforts made to meet and confer regarding the same. Plaintiff shall submit
17 a Memorandum of Fees and Costs. Plaintiff must submit a Memorandum of Fees and Costs consistent
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20 or before March 1, 2022. Defendant may file an opposition thereto on or before March 8, 2022. No late
21 submission will be considered.

22 **IT IS FURTHER RECOMMENDED** that adverse inferences shall be entered against the
23 Defendant that any and all documents, any and all responses to Interrogatories, and Request for Production
24 of documents and failure to make 16.2 disclosures not made by February 14, 2022 or any and all withheld
25 information; the inference shall be that the withheld information would not have supported the
26 Defendant's claim in this matter. The exact wording of this inference shall be up to the District Court at
27 the time of the trial in this matter.

IT IS FURTHER RECOMMENDED that this court will hold a status hearing on March 16, 2022 at 1:30 P.M. regarding Ms. Isso's compliance with these recommendations and to determine the amount of attorney's fees awarded to Plaintiff.

Dated: February 22, 2022

Tae Young
DISCOVERY COMMISSIONER

Case No.: D-20-609211-C

1
2
3 **EIGHTH JUDICIAL DISTRICT COURT**
4 **CLARK COUNTY, NEVADA**
5
6

7 HENRY E. GAAR,
8 Plaintiff,
9

Case No.: D-20-609211-C

10 vs.

Dept. No.: H / Discovery

11 TRAKATRA DANIELS,
12 Defendant
13
14

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16 Pursuant to NRCP 16.3(c)(2), you are hereby notified that within
17 fourteen (14) days of being served with a report, any party may file and serve
18 written objections to the recommendations. Written authorities may be filed with
19 an objection, but are not mandatory. If written authorities are filed, any other party
20 may file and serve responding party within seven (7) days after being served with
21 objections.
22
23

24 A copy of foregoing Discovery Commissioner's Report and
25 Recommendations was:
26
27
28

✓ Mailed to Plaintiff/Defendant on the 22ND day of FEB, 2022,
to the following address:

Jennifer Isso, Esq.
Isso & Hughes
2470 St. Rose Pkwy Ste. 306F
Henderson, NV 89074

✓ Electronically filed and served on the 22ND day of FEB, 2022

Rachel Jacobson, Esq. - reli@jacobsonlawltd.com

Jennifer Isso, Esq. - ji@issohugheslaw.com

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Dated this 22ND day of FEB, 2022.

Tracy George
Commissioner Designee

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Henry E Gaar, Plaintiff.

CASE NO: D-20-609211-C

7 vs.

DEPT. NO. Department H

8 Traketra Daniels, Defendant.
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

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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: 4/12/2022

15 Gerald Neal

geraldfneal@aol.com

16 Rachel Jacobson

eservice@jacobsonlawltd.com

17 Jennifer Isso

ji@issohugheslaw.com

18 Jennifer Isso

info@lowestpricelawyers.com

19
20 If indicated below, a copy of the above mentioned filings were also served by mail
21 via United States Postal Service, postage prepaid, to the parties listed below at their last
known addresses on 4/13/2022

22 Jennifer Isso

2470 St. Rose PKWY STE 306F
Henderson, NV, 89074

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

August 03, 2020

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

August 03, 2020 10:00 AM Motion

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Kathy Prock

PARTIES:

Henry Gaar, Plaintiff, present	Kurt Smith, Attorney, present
Jennifer Isso, Unbundled Attorney, not present	
Traketra Daniels, Defendant, present	Gerald Neal, Attorney, not present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- Both parties, Attorney Smith, and Attorney Neal appeared telephonically, pursuant to the Administrative Orders for public safety.

Court Marshal stated he did not have a good phone number for Defendant. Attorney Smith stated Defendant is now represented by Attorney Gerald Neal. Attorney Neal was called and he proved the phone number for Defendant to appear.

Attorney Smith stated Plaintiff has not seen the child in two months. Attorney Neal stated Plaintiff has two (2) active domestic violence charges. Attorney Smith stated there was an arrest in June, 2020.

Court noted the case number is D-20-609552-P that Attorney Neal filed for Defendant, and the hearing set on that case of 8/5/2020 at 10:00 AM will stand.

Attorney Neal stated they had a hearing in the Protection Order case (T-20-206283-T) and the Protection Order was extended to 8/5/2020. Further, everything has been filed in the "T" case. Court informed counsel it can see the paperwork filed in the "T" case.

PRINT DATE:	04/25/2022	Page 1 of 25	Minutes Date:	August 03, 2020
-------------	------------	--------------	---------------	-----------------

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

D-20-609211-C

COURT ORDERED, the following:

Cases D-20-609552-P and D-20-609211-C shall be LINKED, and all documents shall be filed in the LOWER CASE number.

Matter CONTINUED to be heard with case D-20-609552-P on 8/5/2020 at 10:00 AM.

CONTINUED TO: 8/5/2020 10:00 AM - Regional Justice Center, Courtroom 3G

INTERIM CONDITIONS:

FUTURE HEARINGS:

PRINT DATE:	04/25/2022	Page 2 of 25	Minutes Date:	August 03, 2020
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

August 05, 2020

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

August 05, 2020 10:00 AM Motion

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Kathy Prock

PARTIES:

Henry Gaar, Plaintiff, present	Kurt Smith, Attorney, present
Jennifer Isso, Unbundled Attorney, not present	
Traketra Daniels, Defendant, present	Gerald Neal, Attorney, present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- This matter is a companion case with D-20-609552-D and T-20-206283-T heard simultaneously.

Both parties, Attorney Smith, and Attorney Neal appeared telephonically, pursuant to the Administrative Orders for public safety.

Court stated it reviewed the TPO case and all the documents in the domestic cases.

Attorney Smith stated Plaintiff is requesting joint physical custody, his best days are Monday to Thursday during the week, and his busiest days are on the weekends.

Court noted there was an allegation that there was a video of the altercation that occurred on 6/12/2020. Attorney Neal stated Defendant has the video, they are not sure out clear it is, and that is why they held it. Further, the incident occurred at the marital residence when Plaintiff did not return the child for an appointment. Also, there is a hearing on 10/4/2020 in Henderson, NV. Defendant is requesting an extension of the Protection Order. Attorney Neal stated Defendant is requesting temporary primary physical custody, and she has her own apartment.

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Discussion regarding the gun, the parties' employments, the parties' incomes, and Defendant currently being on Worker's Comp. for an injury at work.

Court stated it has jurisdiction over the subject matter and the parties

COURT ORDERED, the following:

Parties REFERRED to the FAMILY MEDIATION CENTER to formulate a PARENTING AGREEMENT, with SAFETY PROTOCOL. Return date set.

Parties shall share JOINT LEGAL CUSTODY.

TEMPORARILY, Plaintiff's TIME SHARE shall be from Monday at 9:00 AM until Thursday at 6:00 PM.

TEMPORARILY, Defendant's TIME SHARE shall be from Thursday at 6:00 PM until Monday at 9:00 AM.

The EXCHANGES shall take place at 2801 N. RAINBOW BLVD.

Parties are to have NO CONTACT between them and EVERYTHING is to go through their attorneys.

Issue of ATTORNEY'S FEES shall be DEFERRED.

Plaintiff shall PAY Defendant \$900.00 per month in CHILD SUPPORT, beginning 8/1/2020, and shall be due on the FIRST DAY of each month, thereafter.

The PROTECTION ORDER in case no. T-20-206283-T shall be EXTENDED to 9/16/2020, and AMENDED to include the CUSTODY SCHEDULE and EXCHANGES are EXEMPT.

The HEARING scheduled for 8/24/2020 at 11:00 AM in the case no. T-20-206283-T, shall be VACATED.

All FUTURE documents shall be FILED in the lower case number D-20-609211-C.

9/16/2020 11:00 AM RETURN: FMC (MEDIATION) - Regional Justice Center, Courtroom 3G

INTERIM CONDITIONS:

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FUTURE HEARINGS:

Aug 05, 2020 10:00AM Motion
Plaintiff's Motion for Primary Physical Custody of the Minor Child, for Sole Legal Custody, for
Child Support, for Medical Coverage, for Visitation at Dad's Discretion for Mom, for the Tax
Exemption, for one Half of School and Extra-Curricular Activities Expenses and Costs, for One Half
of Day Care Costs, for Attorney's Fees and Costs, and for Other Related Relief (Cont. from 8/3/2020)
RJC Courtroom 03G Ritchie, T. Arthur, Jr.

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

October 20, 2020

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

October 20, 2020 10:00 AM All Pending Motions

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Kathy Prock

PARTIES:

Henry Gaar, Plaintiff, present	Kurt Smith, Attorney, present
Jennifer Isso, Unbundled Attorney, not present	
Traketra Daniels, Defendant, present	Gerald Neal, Attorney, present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- RETURN HEARING: FMC (MEDIATION) CASE MANAGEMENT CONFERENCE

COURT CLERKS: Kathy Prock/Tiffany Schmidt (ts)

This matter is a companion case with (Case # T-20-208717-T) heard simultaneously.

Both parties, Attorney Smith and Attorney Neal appeared telephonically, pursuant to Administrative Orders for public safety.

Court reviewed the history of the case.

Court stated a letter was received from the Family Mediation Center indicating the parties participated in mediation and reached a Partial Parenting Agreement. Parties could not agree on the regular time share. Both counsel stated they are fine with the Court E-filing the Partial Parenting Agreement.

Discussion regarding the Temporary Protection Order (TPO). Attorney Neal requested to extend the

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TPO until trial. Attorney Smith argued that the TPO is unnecessary.

Further discussion regarding Attorney s fees and the parties using Talking Parents to communicate.

COURT ORDERED, the following:

NON-JURY TRIAL set.

DISCOVERY CUTOFF shall be 12/18/2020.

PARTIAL PARENTING AGREEMENT affirmed and adopted by the court.

Parties shall continue to follow the TEMPORARY TIME SHARE.

PROTECTION ORDER (case # T-20-208717-T) shall be EXTENDED to 1/12/2021. Per agreement by counsel, the parties use of Talking Parents will not be a violation of the PROTECTION ORDER.

Defendant shall be AWARDED Attorney s fees and costs in the amount of \$2,000.00 to be paid by Plaintiff within 30 days.

Attorney Smith shall prepare the ORDER and allow Attorney Neal to review and sign off.

1/21/2021 1:30PM NON-JURY TRIAL-Regional Justice Court, Courtroom 3G

INTERIM CONDITIONS:

FUTURE HEARINGS:

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

May 19, 2021

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

May 19, 2021 10:00 AM All Pending Motions

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Brandee Kapanui

PARTIES:

Henry Gaar, Plaintiff, present	Rachel Jacobson, Attorney, present
Jennifer Isso, Unbundled Attorney, not present	
Traketra Daniels, Defendant, present	Gerald Neal, Attorney, present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- PLAINTIFF'S MOTION FOR SET ASIDE DECREE OF CUSTODY OR, IN THE ALTERNATIVE, MODIFY CUSTODY AND MOTION FOR REVIEW OF CHILD SUPPORT, FOR ORDER TO SHOW CAUSE, AND FOR RELATED RELIEF DEF'S OPPOSITION TO PLAINTIFF'S MOTION FOR SET ASIDE DECREE OF CUSTODY OR, IN THE ALTERNATIVE, MODIFY CUSTODY AND MOTION FOR REVIEW OF CHILD SUPPORT, FOR ORDER TO SHOW CAUSE, AND FOR RELATED RELIEF AND COUNTER MOTION TO CHANGE CUSTODY DUE TO CHANGE IN CIRCUMSTANCES AND FOR THE PLAINTIFF TO PAY FOR DAY CARE AND FOR ATTORNEY'S FEES

Plaintiff in office with Attorney Rachel Jacobson and Defendant in office with Attorney Gerald Neal, all appearing telephonically, pursuant to Administrative Orders for public safety.

Court reviewed the history of the case.

Attorney Jacobson represented the matter was reopened because of the child's broken arm and Defendant refused to provide Plaintiff with any information. Attorney Jacobson further represented Defendant provided her phone number at the hospital as Plaintiff's phone number and also did the same at the child's school. Defendant also denied Plaintiff with Facetime visitations, and when she

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found out about Plaintiff's motion, she filed a false TPO against him.

Attorney Richards represented Defendant alleges that Plaintiff cut the battery cables out of her vehicle. Attorney Richards stated Defendant told Plaintiff about the child's broken arm and it was not serious. Attorney Richards further stated the child is enrolled in speech therapy, however Plaintiff has not taken the child to any appointment during his custodial time.

Court noted the parties' agreements in the Decree of Custody and the parties should follow that agreement or it may provide reason to reopen the case.

Extensive discussion was held regarding the child's school, exchanges and related issues.

Court admonished the parties to follow the orders.

COURT stated its FINDINGS and ORDERED the following:

Plaintiff's MOTION to SET ASIDE and MODIFY shall be DENIED.

Plaintiff's REQUEST to ENFORCE the AGREEMENTS to REQUIRE the DISCLOSURE of ADDRESS shall be GRANTED.

Matter shall be CONTINUED to 7/7/2021 at 10:00 A.M. regarding the child's school issue.

Attorney Neal shall prepare the Order, Attorney Jacobson shall review form and content.

INTERIM CONDITIONS:

FUTURE HEARINGS: Jul 07, 2021 10:00AM Opposition & Countermotion
Def's Opposition to Plaintiff's Motion for Set Aside Decree of Custody or, in The Alternative, Modify Custody and Motion for Review of Child Support, for Order to Show Cause, and for Related Relief and Counter Motion to Change Custody Due to Change in Circumstances and for the Plaintiff to Pay for Day Care and for Attorney's Fees (Cont from 5/19/2021)
RJC Courtroom 03G Ritchie, T. Arthur, Jr.

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

July 07, 2021

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

July 07, 2021 10:00 AM All Pending Motions

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Tristana L. Cox

PARTIES:

Henry Gaar, Plaintiff, present	Rachel Jacobson, Attorney, present
Jennifer Isso, Unbundled Attorney, not present	
Traketra Daniels, Defendant, present	Gerald Neal, Attorney, present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR SET ASIDE DECREE OF CUSTODY OR, IN THE ALTERNATIVE, MODIFY CUSTODY AND MOTION FOR REVIEW OF CHILD SUPPORT, FOR ORDER TO SHOW CAUSE, AND FOR RELATED RELIEF AND COUNTER MOTION TO CHANGE CUSTODY DUE TO CHANGE IN CIRCUMSTANCES AND FOR THE PLAINTIFF TO PAY FOR DAY CARE AND FOR ATTORNEY'S FEES (CONT FROM 5/19/2021)...PLAINTIFF'S REPLY TO OPPOSITION

Defendant/Mom was present telephonically on Bluejeans. All other parties present appeared via video conference on Bluejeans.

Mr. Neal stated he ordered the video to prepare the Order from the last hearing and will submit it to the Court. Discussion regarding how Plaintiff/Dad is listed on the child's school records, Dad's access issues with the school and teachers, no agreement to the child attending that school, the best interest of the child, police involvement, and Dad not being allowed to be involved in the child's life.

Court NOTED the request to set aside the decree, the request for an Order to Show Cause, and the request to change custody were all denied at the May 19, 2021. This matter was continued to address

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the joint legal custody issues Dad had with the pre-school.

Further discussion regarding the pre-school denying Dad access to the child's records and Dad's attempts to resolve the matter. The Court clarified the Orders from the May 19, 2021 hearing.

Further discussion regarding the Court's findings of no adequate cause for an Evidentiary Hearing. Ms. Jacobson stated Dad has been denied his Facetime with the child. Further discussion regarding the same.

COURT stated its FINDINGS and ORDERED the following:

The ORDER from the May 19, 2021 hearing shall be prepared and served on the child's PRE-SCHOOL. Dad has a right to be treated as a joint legal custodian, to be included on the pre-school records, and to have access to the pre-school's information. The pre-school is expected to treat Dad the same way they treat Mom and It is Mom's responsibility to fix the relationship between Dad and the school. If there is no improvement after the Order has been served on the pre-school and it is not in the best interest for the child to be at that pre-school, Dad may file a request for the Court to order a different child care facility.

Dad does NOT have to take the child to the PRE-SCHOOL during his custodial time. The Court is NOT going to Order the child cannot attend the pre-school during Mom's custodial time.

The COMMUNICATION between the parties on Talking Parents is not to be used to argue; its notice regarding the child and how the child is doing.

Mr. Neal shall PREPARE the Order from today's hearing. If the orders from the May 19, 2021 and today's hearings are combined, the caption shall include both hearing dates.

INTERIM CONDITIONS:

FUTURE HEARINGS:

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

November 08, 2021

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

November 08, 2021 10:00 AM All Pending Motions

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Helen Green

PARTIES:

Henry Gaar, Plaintiff, not present	Rachel Jacobson, Attorney, not present
Jennifer Isso, Unbundled Attorney, not present	
Traketra Daniels, Defendant, not present	Gerald Neal, Attorney, not present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS...DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS, AND DEFENDANT'S COUNTERMOTION FOR ATTORNEY'S FEES AND OTHER RELATED RELIEF...REPLY TO OPPOSITION

NO APPEARANCES

Prior to Court, an incident occurred at the Regional Justice Center that required the Court and staff to evacuate the building and the Court was unable to hear the matter; therefore, COURT ORDERED; matter CONTINUED TO 11/10/21 @ 10:00 A.M.

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FUTURE HEARINGS:

Nov 10, 2021 10:00AM Motion
Plaintiff s Motion For An Order To Show Cause, To Modify Custody And Related Relief, And For
Attorney s Fees And Costs Comes Now Plaintiff, Henry E. Gaar

RJC Courtroom 03G Ritchie, T. Arthur, Jr.

Nov 10, 2021 10:00AM Opposition & Countermotion
Defendant's Opposition To Plaintiff's Motion For An Order To Show Cause, To Modify Custody And
Related Relief, And For Attorney's Fees And Costs, And Defendant's Countermotion For Attorney's
Fees And Other Related Relief
RJC Courtroom 03G Ritchie, T. Arthur, Jr.

Nov 10, 2021 10:00AM Hearing
Reply to Opposition
RJC Courtroom 03G Ritchie, T. Arthur, Jr.

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

November 10, 2021

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

November 10, 2021 10:00 AM All Pending Motions

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Helen Green

PARTIES:

Henry Gaar, Plaintiff, present	Rachel Jacobson, Attorney, present
Jennifer Isso, Unbundled Attorney, not present	
Traketra Daniels, Defendant, not present	Gerald Neal, Attorney, not present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANT...REPLY TO OPPOSITION...DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS, AND DEFENDANT'S COUNTERMOTION FOR ATTORNEY'S FEES AND OTHER RELATED RELIEF...PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS

Prior to Court, the Court's staff contacted attorney Isso and counsel stated that she was between hearings in two departments and was unable to attend this hearing. The Court noted that the matter was re-set to today do to an incident at the RJC on 11/8/21 wherein the Courthouse was evacuated and the Court was unable to hear the matter as set that day.

The COURT FINDS good cause to continue the matter.

COURT ORDERED:

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Attorney Neal has substituted out as Attorney of Record for Defendant and attorney Isso is Defendant's attorney. Attorney Neal's motion is GRANTED and although the matter is moot, if counsel wishes to submit an Order he may do so.

Matter CONTINUED TO 11/17/21 @ 10:00 A.M.

INTERIM CONDITIONS:

FUTURE HEARINGS: Nov 17, 2021 10:00AM Motion
Plaintiff s Motion For An Order To Show Cause, To Modify Custody And Related Relief, And For
Attorney s Fees And Costs Comes Now Plaintiff, Henry E. Gaar

RJC Courtroom 03G Ritchie, T. Arthur, Jr.

Nov 17, 2021 10:00AM Opposition & Countermotion
Defendant's Opposition To Plaintiff's Motion For An Order To Show Cause, To Modify Custody And
Related Relief, And For Attorney's Fees And Costs, And Defendant's Countermotion For Attorney's
Fees And Other Related Relief
RJC Courtroom 03G Ritchie, T. Arthur, Jr.

Nov 17, 2021 10:00AM Hearing
Reply to Opposition
RJC Courtroom 03G Ritchie, T. Arthur, Jr.

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

November 17, 2021

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

November 17, 2021 10:00 AM All Pending Motions

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Helen Green

PARTIES:

Henry Gaar, Plaintiff, present	Rachel Jacobson, Attorney, present
Jennifer Isso, Unbundled Attorney, present	
Traketra Daniels, Defendant, present	Gerald Neal, Attorney, not present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS...DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE, TO MODIFY CUSTODY AND RELATED RELIEF, AND FOR ATTORNEY'S FEES AND COSTS, AND DEFENDANT'S COUNTERMOTION FOR ATTORNEY'S FEES AND OTHER RELATED RELIEF...REPLY TO OPPOSITION

Both counsel and both parties appeared by Bluejeans technology.

The Court reviewed the case. Argument by counsel. Discussion by the Court regarding the conflict between the parties and the contract that the parties had entered into that were are not following.

There COURT FINDS that there is adequate cause to have a hearing to modify the parties' stipulated custody decree.

The Court admonished both parties to follow the Court Orders.

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COURT ORDERED:

Both parties are admonished to follow the Court's Orders. The Order entered and filed on 10/4/21 is still applicable and the parties are to follow it.

Both counsel shall have 20 days of today's date to have leave to file amendments to their pleadings to cure whatever procedural defects there are with respect to modifying or enforcing the Order and that are expressly related to the relief that the parties are requesting at the evidentiary hearing. Counsel shall do so by 12/7/21.

Discovery Cut-off is Friday 1/14/22.

Evidentiary Hearing SET for 2/1/22 @ 1:30 P.M.

INTERIM CONDITIONS:

FUTURE HEARINGS: Feb 01, 2022 1:30PM Evidentiary Hearing
RJC Courtroom 03G Ritchie, T. Arthur, Jr.

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

February 01, 2022

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

February 01, 2022 1:30 PM Evidentiary Hearing

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: RJC Courtroom 03G

COURT CLERK: Helen Green

PARTIES:

Henry Gaar, Plaintiff, present	Rachel Jacobson, Attorney, present
Jennifer Isso, Unbundled Attorney, present	
Traketra Daniels, Defendant, present	Gerald Neal, Attorney, not present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- EVIDENTIARY HEARING

Attorney Jacobson and Plaintiff appeared by Bluejeans technology.
Attorney Isso and Defendant appeared in the Courtroom.

The Court reviewed the case.

COURT ORDERED; attorney Jacobson's request to continue the matter so that she and Plaintiff could appear in person is DENIED. The Court FINDS no good cause and no merit to continue the matter.

Opening statements by counsel.

Witnesses and exhibits per worksheets.

COURT ORDERED:

The Non-Jury Trial shall be CONTINUED. The Court's staff shall notify counsel of the continuance

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date as soon as a date is determined.

INTERIM CONDITIONS:

FUTURE HEARINGS: Feb 01, 2022 1:30PM Evidentiary Hearing
RJC Courtroom 03G Ritchie, T. Arthur, Jr.

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint**COURT MINUTES**

February 02, 2022

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

February 02, 2022 1:00 PM Hearing

HEARD BY: Young, Jay**COURTROOM:** Courtroom 08**COURT CLERK:** Gina Bradshaw-Taylor**PARTIES:**

Henry Gaar, Plaintiff, not present	Rachel Jacobson, Attorney, present
Jennifer Isso, Unbundled Attorney, present	
Traketra Daniels, Defendant, present	Gerald Neal, Attorney, not present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- HEARING: OST; RE: MOTION TO COMPEL DISCOVERY.

In the interest of public safety due to the Coronavirus pandemic, the matter was heard via VIDEO CONFERENCE through the BlueJeans application.

COURT NOTED that there was not an opposition filed.

Ms. Isso states that there was no opposition filed and would like to resolve the issues without an opposition.

Ms. Jacobson states that on December 16, 2021, we noticed Defendant's deposition also on January 12, 2022, and on that date, Defendant did not show up for the deposition. It was rescheduled for January 14, 2022. Defendant and her attorney refused to appear in person, so it was held on Zoom. Defendant refused to turn on her camera, so it was taken by audio-only. During the deposition, Defendant was asked to read some answers from her phone because she claimed she could not recollect many responses to many questions. Ms. Isso told her client not to read from her phone. Then it was asked of the Court to sit in on the deposition, and before the Court entered, Defendant, stated that her cell

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phone no longer worked. The deposition was continued until January 18, 2022.

Ms. Isso states that Ms. Jacobsen was only supposed to ask her client the three (3) questions that she did not get to ask her when the cell phone had died, not redo the whole deposition.

COURT NOTED that there was not any production of documents.

Ms. Isso states that if something was missing, Ms. Jacobsen could have contacted her.

Ms. Jacobsen states that she did reach out to Ms. Isso.

COMMISSIONER stated its FINDINGS and RECOMMENDATIONS:

1. Motion shall be GRANTED. Ms. Jacobsen is allowed to ask any missing questions or natural follow-up. Defendant must appear on video, and if she can not, she must appear at Ms. Jacobsen's office or appear at a deposition suite which she shall bear the cost.

2. The Court FINDS that Ms. Isso's behavior at the last deposition was REPUGNANT and UNPROFESSIONAL. She was rude and not appropriate, and she impeded the fair examination of the witness and counsel's ability to ask simple foundational questions. Ms. Isso shall be personally SANCTIONED under rules 37d and 30d2 in the amount of \$1000.00 payable to LEGAL AID of SOUTHERN NEVADA. This must be paid and proof of payment by February 14, 2022.

3. Motion shall be GRANTED for production of documents and interrogatories. There was a false certification filed by Ms. Isso's office regarding the production of documents. Also, regarding the production of documents and interrogatories, there are attempts to answer but only referred to 16.2 disclosures that must provide the bates range as to each. Answers to interrogatories can not be N/A is not appropriate. The answer must be articulated yes or no or provide a narrative. The motion is GRANTED for interrogatories 6,7,8,10,12,14,16,22,26,27,28.

4. The objections are WAIVED as UNTIMELY. Second, regarding the objection, with a notable exception of request number one (1). Each of the remaining requests contains the same objection: objection, relevance, vague, ambiguous, and unduly burdensome. There was no effort to explain what was vague, how unduly burdensome. Each objection is BOILERPLATE. Objections need to have specificity. Therefore, the objections are tantamount to no objections at all, and had they not been waived already for being untimely, they would have been waived for being inappropriate. Moreover, Rule 26g requires that you certify that your answers align with the civil procedure when you sign a discovery pleading.

5. Regarding the false certification, Rule 26g requires the Court to SANCTION counsel. There shall be a separate SANCTION of \$500.00 pursuant to 26g. Payable to LEGAL AID of SOUTHERN NEVADA and shall be paid by February 14, 2022.

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6. ATTORNEY FEES shall be GRANTED. Pursuant to Rule 37A 5A. In addition to the sanctions, that would include the cost of the first deposition and the costs for attorney fees regarding the second deposition and the costs and fees for this motion. An INFERENCE shall also be GRANTED that any documents, responses to interrogatories, request for production of documents, and failure to disclose 16.2 disclosures not made by February 14, 2022, for any all withheld information. The inference will be that the withheld information would not have supported Defendant's claim in this matter.

INTERIM CONDITIONS:

FUTURE HEARINGS:

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

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint**COURT MINUTES**

April 12, 2022

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

April 12, 2022 11:00 AM Objection

HEARD BY: Ritchie, T. Arthur, Jr.**COURTROOM:** RJC Courtroom 03G**COURT CLERK:** Tristana L. Cox**PARTIES:**

Henry Gaar, Plaintiff, present	Rachel Jacobson, Attorney, present
Jennifer Isso, Unbundled Attorney, present	
Traketra Daniels, Defendant, present	Gerald Neal, Attorney, not present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- DEFENDANT'S OBJECTION TO DISCOVERY COMMISSIONER'S REPORT AND RECOMMENDATION

In the interest of public safety due to the Coronavirus pandemic, all parties present appeared via video conference through the BlueJeans application.

The Court reviewed the pending objection to the Discovery Commissioner's Report and Recommendation (DCRR). Argument by Ms. Isso regarding opposing counsel not holding a meet and confer regarding discovery or making good faith efforts to meet and confer, not being served with the exhibits referenced in the motion to compel, the sanctions recommended against her without notice it was a sanction hearing, alleged ex-parte communication between Ms. Jacobson and Commissioner Young, the deposition of Defendant, the Commissioner's abuse of discretion, and attorney's fees.

Argument by Ms. Jacobson regarding inappropriate conduct of Ms. Isso, the Commissioner's sanctions against Ms. Isso, evidence provided regarding attempts to meet and confer, production of documents, misrepresentations regarding the request for sanctions, the video exhibits she

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inadvertently failed to serve on Ms. Isso, and she denied any ex-parte communications with Commissioner Young.

The Court is not evaluating the merits of the case; this is a review of the recommendation of a judicial officer regarding Plaintiff's motion to compel. The Discovery Commissioner is vested with judicial authority pursuant to NRCP 53. In this matter there was a motion filed, a hearing was held, and there was a written Report and Recommendation to which Defendant timely objected to. COURT ORDERED Defendant's OBJECTION is DENIED as there has been no violation of due process rights, there is no merit to the objection to the recommendations made, it was within the Commissioner's discretion, there was sufficient proof, and it was not clearly erroneous. The Discovery Commissioner's Report and Recommendation shall be signed and filed by the Court.

INTERIM CONDITIONS:

FUTURE HEARINGS:

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Child Custody Complaint

COURT MINUTES

April 20, 2022

D-20-609211-C Henry E Gaar, Plaintiff.
vs.
Traketra Daniels, Defendant.

April 20, 2022 8:30 AM Minute Order

HEARD BY: Ritchie, T. Arthur, Jr.

COURTROOM: Chambers

COURT CLERK: Tristana L. Cox

PARTIES:

Henry Gaar, Plaintiff, not present	Rachel Jacobson, Attorney, not present
Jennifer Isso, Unbundled Attorney, not present	
Traketra Daniels, Defendant, not present	Gerald Neal, Attorney, not present
Tristen Gaar, Subject Minor, not present	

JOURNAL ENTRIES

- MINUTE ORDER: NO HEARING HELD, NO PARTIES PRESENT

IT IS HEREBY ORDERED that due to the Court's schedule, the above-entitled case currently set for Trial on April 21, 2022 at from 9:00 a.m. to 12:00 p.m. has been reset to begin on the 2nd day of June, 2022, at the hour of 9:00 a.m. for three (3) hours, at the Regional Justice Center, 200 Lewis Avenue, Courtroom 3G, Las Vegas, Nevada.

CLERK'S NOTE: a copy of this Minute Order was e-mailed to Plaintiff's attorney and mailed to Defendant at her physical address on file with the Court. (4/20/2022 TC)

INTERIM CONDITIONS:

FUTURE HEARINGS:

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

JENNIFER ISSO, ESQ.
2470 ST. ROSE PKWY. #306F
HENDERSON, NV 89074

DATE: April 25, 2022
CASE: D-20-609211-C

RE CASE: HENRY E. GAAR vs. TRAKETRA DANIELS

NOTICE OF APPEAL FILED: April 20, 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 TO APPELLANT COURT; DISTRICT COURT
DOCKET ENTRIES; CIVIL COVER SHEET; ORDER OF DISCOVERY COMMISSIONER'S REPORT
AND RECOMMENDATIONS; NOTICE OF ENTRY OF ORDER ON DISCOVERY
COMMISSIONER'S REPORT AND RECOMMENDATIONS; DISTRICT COURT MINUTES;
NOTICE OF DEFICIENCY

HENRY E. GAAR,

Plaintiff(s),

vs.

TRAKETRA DANIELS,

Defendant(s),

Case No: D-20-609211-C

Dept No: H

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 25 day of April 2022.

Steven D. Grierson, Clerk of the Court



Heather Ungermann, Deputy Clerk