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2 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

3 HENRY E. GAAR,  
4 Respondent,

5 vs.

6 TRAKETRA DANIELS,  
7 Appellant.

Supreme Court Case No. 20-0021  
Electronically Filed  
May 24 2022 06:22 p.m.  
Docketing Statement  
Civil Appeals  
Elizabeth A. Brown  
Clerk of Supreme Court

8  
9 **Docketing Statement of Civil Appeals**

10 1. Judicial District Clark County District Court Department Family Division

11 County Clark County

Judge Arthur Ritchie

12 District Ct. Case No. D-20-609211-C

13  
14 **2. Attorney filing this docketing statement**

15 Attorney Jennifer Isso, Esq

Telephone (702) 434-4424

16 Firm Isso Hughes Law Firm

17 Address:

18 8965 S. Eastern Ave., Suite 120

19 Las Vegas, Nevada 89123

20  
21 Previous Client: Traketra Daniels

22  
23 **3. Attorney(s) representing respondent(s)**

24 Attorney Rachel Jacobson, Esq

Telephone (702) 601-0770

25 Firm Jacobson Law Office, Ltd

Address:

64 N. Pecos Rd #200,  
Henderson, Nevada 89074

Clients Henry E Gaar

**4. Nature of disposition:**

Final order after hearing.

**5. Does this appeal raise issues concerning child custody, venue, or termination of parental rights?**

No. Sanctions against counsel.

**6. Pending and prior proceeding in this court.**

Henry E. Gaar v. Traketra Daniels D-20-609211-C

**7. Pending and prior proceedings in other courts.**

No.

**8. Nature of the Action.**

1. In this highly contentious custody, Respondent reopened the case after a stipulated decree was signed and entered on January 19, 2021 where the parties agreed to share Joint Legal and Joint Physical Custody. Respondent's counsel sought discovery on information that was irrelevant and not proportional to the needs of the case. Counsel, Isso and her client however provided hundreds of pages of information. Respondent's counsel then filed a motion to compel which was granted on order shorten time. Ms. Isso explained at the hearing that there was no meet and confer and raised other objections. Respondent's counsel and Discovery Commissioner Jay Young also engaged in ex-parte communications prior to the hearing where Respondent's counsel emailed deposition audio recordings to the Discovery Commissioner and intentionally did not provide these to Ms. Isso. Ms. Isso did not have the audio recordings and had never listened to them. Discovery Commissioner Jay Young used the information he obtained through ex-parte communications from Respondent's counsel and then proceeded to sanction Ms. Isso \$1500 in front of numerous other attorneys waiting on bluejeans, humiliating her and ruining the relationship between her and her client. The Discovery Commissioner then ordered that certain tasks are completed prior to the time lapsing for when she can file an objection to his report and

1 recommendation. Ms. Isso filed an objection to the report and  
2 recommendation. At the hearing on the objection, and was counting on  
3 Judge Ritchie to rectify the issue. He has the power to do so but chose not to.  
4 Rather, Judge Ritchie seemed ill prepared and did not ask a single question  
or make any inquiry and he outright affirmed and adopted the report and  
recommendation.

## 5 **9. Issues on Appeal**

- 6 • Whether the District Court erred when it adopted the DCRR considering that  
7 Respondent's Counsel engaged in ex-parte communications and emailed  
8 deposition audio recordings to the discovery commissioner but intentionally  
9 did not provide said recording to Ms. Isso pursuant to EDCR 2.34(g). And  
Respondent's counsel admitted to such acts in writing.
- 10 • Whether the District Court erred when it adopted the discovery  
11 commissioner's report and recommendation (herein after "DCRR")  
12 considering that there was no meet and confer pursuant to EDCR 2.34. *See*  
13 *also Nevada Power v. Monsanto*, 151 F.R.D. 118, 120 (D. Nev. 1993).
- 14 • Whether the District Court erred when it adopted the DCRR considering that  
15 Respondent's counsel did not provide a declaration or affidavit setting forth  
16 the efforts she made to meet and confer pursuant to EDCR 2.34(d); EDCR  
17 5.602(d) ("A discovery motion must set forth... what attempts were made to  
18 resolve the dispute, what was resolved, what wasn't resolved and the reasons  
therefore").
- 19 • Whether the District Court erred when it adopted the DCRR considering that  
20 Respondent's counsel never communicated to Ms. Isso what was deficient in  
21 the discovery responses provided and therefore Ms. Isso and Traketra were  
22 not provided with notice or an opportunity to rectify.
- 23 • Whether the District Court erred when it adopted the DCRR considering that  
24 Respondent's counsel never had any discussion with Ms. Isso re: deficient  
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1 discovery responses rather than a fulsome discussion as required. RDCR  
2 2.34(d) Nevada Power v. Monsanto, 151 R.R.D. 118, 120 (D.Nev 1993).

- 3 • Whether the District Court erred when it adopted the DCRR considering that  
4 Respondent's counsel declaration failed to set in detail what efforts she  
5 made to meet and confer, the manner in which she communicated, the  
6 disputed issue, as well as the dates, times, and results of the discussions and  
7 why the negotiations were fruitless. *Shuffle Master Inc v. Progressive*  
8 *Games Inc*, 170 F.R.166, 170 (D. Nev. 1996); *Messier v. Southbury Training*  
9 *School*, 1998 U.S. Dist. Lexis 20315 (D. Conn. 1998).
- 10 • Whether the District Court erred when it adopted the DCRR considering that  
11 Respondent was requesting information that was irrelevant and in violation  
12 of *Mcmonigle v. Mcmonigle*, 110 Nev. 1047 (D. Nev 1994), overruled  
13 regarding evidence pertaining to domestic violence in *Castle v. Simmons*,  
14 120 Nev. 98, 86 P.3d 1042 (D. Nev. 2004).
- 15 • Whether the District Court erred when it adopted the DCRR considering that  
16 Respondent's counsel was seeking information in discovery that was not  
17 relevant or proportional to the needs of the case (therefore asking for  
18 information prior to the date of the entry of the previous custody decree).  
19 *Venetian Casino Resort, LLC v. Eighth Judicial District Ct.*, 136 Nev. 221,  
20 467 P.3d 1 (2020).
- 21 • Whether the District Court erred when it adopted the DCRR considering that  
22 the Discovery Commissioner raised arguments for the first time at the  
23 hearing on the motion to compel and said arguments were not raised in the  
24 written motion, thereby ambushing Ms. Isso.
- 25 • Whether the District Court erred when it adopted the DCRR considering that  
26 there was no written order from the discovery commissioner telephonic  
27 conference held during the first deposition (which ordered that a second  
28 deposition take place for the sole purpose of asking questions to elicit

1 information Defendant's phone) and thereby sanctioning Ms. Isso when  
2 Respondent's counsel alleged that Ms. Isso did not follow said order.

- 3 • Whether the District Court erred when it adopted the DCRR considering that  
4 the Discovery Commissioner outright and arbitrarily sanctioned Ms. Isso  
5 without the opportunity to seek counsel.
- 6 • Whether the District Court erred when it adopted the DCRR considering that  
7 the Discovery Commissioner sanctioned Ms. Isso without notice, an  
8 opportunity to respond and be heard and failing to hold a separate hearing on  
9 the sanctions issue.
- 10 • Whether the District Court erred when it adopted the DCRR considering that  
11 the district court did not adequately consider less severe sanctions. *Young v.*  
12 *Johnny Ribeiro Bldg.*, 106 Nev. 88, 92, 787 P.2d 777, 779 (1990).
- 13 • Whether the District Court erred when it adopted the DCRR considering that  
14 the discovery commissioner ordered a second deposition but there was no  
15 written order to that effect and the scope and purpose of the deposition was  
16 vague and ambiguous (hence the issues at the second deposition).
- 17 • Whether the District Court erred when it adopted the DCRR considering that  
18 Ms. Isso and Traketra appeared to the second deposition but only objected  
19 when Respondent's counsel would ask questions outside of the scope of the  
20 second deposition, specifically to elicit information from Traketra's phone.
- 21 • Whether the District Court erred when it adopted the DCRR considering that  
22 the discovery commissioner sanctioned Ms. Isso \$1500 considering that Ms.  
23 Isso has never had issues with the discovery commissioner previously before  
24 this hearing.
- 25 • Whether the District Court erred when it adopted the DCRR considering that  
26 the Discovery Commissioner sanctioned Ms. Isso considering that there was  
27 no claim for sanctions against Ms. Isso or her client by Respondent.
- 28

- 1 • Whether the District Court erred when it adopted the DCRR considering that  
2 the Discovery Commissioner conducted the proceedings in a criminal  
3 manner rather than a civil manner.
- 4 • Whether the District Court erred when it adopted the DCRR considering that  
5 the Discovery Commissioner did not give an opportunity for Ms. Isso or  
6 Traketra to compel compliance before implementing harsh sanctions or that  
7 such compliance would terminate the sanctions. *See Lewis v. Lewis*, 132 Nev.  
8 453, 456, 373, P.3d 878, 880 (2016).
- 9 • Whether the District Court erred when it adopted the DCRR considering that  
10 the Discovery Commissioner used the harshest form of punishment rather  
11 than making an order to intended compliance.
- 12 • Whether the District Court erred when it adopted the DCRR considering that  
13 the Discovery Commissioner did not consider the hundreds of pages  
14 produced by Ms. Isso's client in response to the requests for production.
- 15 • Whether the District Court erred when it adopted the DCRR considering that  
16 Respondent's counsel did not comply with EDCR 2.40 when her demand to  
17 compel discovery did not set forth the interrogatory or request and the  
18 answer or answers thereto. The rule requires that each discovery request is  
19 fully stated in the body of the motion following immediately thereafter by  
20 the response that was given.
- 21 • Whether the District Court erred when it adopted the DCRR considering that  
22 the discovery commissioner violated Nevada Code of Judicial Conduct  
23 Rules 1.1, 1.2, 2.2 by accepting communications from Respondent's counsel  
24 and used this information against Ms. Isso during the hearing. Respondent's  
25 counsel intentionally did not provide Ms. Isso with the recordings contained  
26 in said communications.  
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- Whether the District Court erred when it adopted the DCRR considering that the discovery commissioner did not sanction Respondent's Counsel pursuant to NRCP 37(a)(5)(A)(i) (contains a mandatory sanction for filing a motion under Rule 37 before attempting in good faith to obtain such information.
- Whether the District Court erred when it adopted the DCRR considering that the DC heard the hearing on an order shorten time and did not give adequate time to prepare and file a response.
- Whether the District Court erred when it adopted the DCRR considering that Ms. Isso's due process rights were violated considering that she was not provided with notice, an opportunity to be heard or with a adequate opportunity to respond.
- Whether the District Court erred when it adopted the DCRR considering that the sanctions imposed was not proportional to the bad conduct alleged.
- Whether NRCP 26(g)(3) is arbitrary and unconstitutional and vague and ambiguous
- Whether the sanctions imposed on Ms. Isso was appropriate in light of the alleged conduct by counsel or the discovery commissioner.

**10. Pending proceeding in this court raising the same or similar issues.**

None.

**11. Constitutional Issues.**

Yes

**12. Other issues. Does this appeal involve any of the following; reversal of well-settled Nevada precedent, an issue arising under the United States and/or Nevada Constitution, a substantial issue of first impression, an issue of public policy, an issue where en banc consideration is necessary to maintain uniformity of this court's decisions, or a ballot question?**

No.

1 **13. Assignment to the Court of Appeals or retention in the Supreme Court.**

2 Assignment to Court of Appeals

3 **14. Trial.** How many days did the trial last?

4 It was a single discovery hearing.

5 **15. Judicial Disqualification**

6 No.

7 **Timeliness of Notice of Appeal**

8 **16. Date of entry of written judgement or order appealed from.**

9 April 20, 2022

10 **17. Date written notice of entry of judgement was served?**

11 April 20, 2022

12 **18. If the time for filing the notice of appeal was tolled by a post-judgement**  
13 **motion (NRCP 50(b), 52(b), or 59)**

14 No.

15 **19. Date notice of appeal was filed**

16 May 2, 2022

17 **20. Specify statute or rule governing the time limit for filing the notice of**  
18 **appeal, e.g., NRAP 4(a) or other**

19 NRAP 4(a)(1).

20 **Substantive Appealability**

21 **21. Specify the statute or other authority granting this court jurisdiction to**  
22 **review the judgement or order appealed from:**

(a)

NRAP 3A(b)(1), and NRS 233B.150 ? check cheat sheet

(b) How each authority provides a basis for appeal from the judgment or order:

NRAP 3A(b)(1) provides that, an appeal may be taken from a final  
judgement entered in an action or proceeding commenced in the court in



1 which the judgement is rendered. Here, the final judgement was the report  
2 and recommendation that included sanctions affirmed by Judge Ritchie.  
3 Pursuant to 3A(b)(1) Jennifer Isso has authority to appeal the final  
4 judgement.

5 NRS 233B.150 provides that an aggrieved party may obtain a review of any  
6 final judgement of the district court by appeal to the appellate court of  
7 competent jurisdiction. Here Jennifer Isso was subject to a final judgement,  
8 where her objection to the discovery commissioners report and  
recommendations was denied.

9 **22. List all the parties involved in the action or consolidated actions in the**  
10 **district court:**

11 (a) Parties:

12 Jennifer Isso, Esq. (Appellant)

13 Rachel Jacobson, Esq., Henry E. Gaar (Respondent)

14 (b) If all parties in the district court are not parties to this appeal, explain in detail  
15 why those parties are not involved in this appeal:

16 Jennifer Isso, Esq. is not representing Traketra Daniels and has no interest in  
17 the appeal.

18 **23. Description of claims**

19 Isso against Garr re: discovery sanctions

20 **24. Did the judgement or order appealed from adjudicate ALL the claims**  
21 **alleged below and the rights and liabilities of ALL the parties to the action or**  
22 **consolidated actions below?**

23 No.

24 **25. If no**

25 (a) Specify the claims remaining pending below:

26 Child Custody modification

27 (b) Specify the parties remaining below  
28

1 Traketra Daniels

2 (c) Did the district court certify the judgment or order appealed from as a final  
3 judgement pursuant to NRCP 54(b)

4 No.

5 (d) Did the district court make an express determination, pursuant to NRCP 54(b),  
6 that there is no just reason for delay and an express direction for the entry of  
7 judgment?

8 No.

9 **26. If you answered “No” to any part of question 25, explain the basis for  
10 seeking appellate review**

11 The appeal is for the sanctions against Jennifer Isso, not the underlying  
12 custody case between Gaar and Daniels. This is a final order and  
13 independently appealable pursuant to NRAP 3Ab.

14 **27. Attach file stamped copies of the following documents:** The following  
15 documents attached are the order after hearing and the notice of entry of order.

### 16 Verification

17 **I declare under penalty of perjury that I have read this docketing statement,  
18 that the information provided in the docketing statement is true and complete  
19 to the best of my knowledge, information and belief, and that I have attached  
20 all required documents to this docketing statement.**

21 Jennifer Isso

22 Name of the appellant

Jennifer Isso, Esq.

Name of counsel of record

### 23 CERTIFICATE OF SERVICE

24 I certify that on the 24th day of May, 2022, I served a copy of this completed  
25 docketing statement upon all counsel of record:  
26  
27  
28

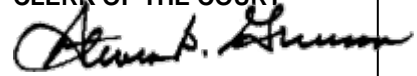
1 By emailing and via the Supreme Court Odyssey system to:

2 Rachel Jacobson, Esq.

3 reli@jacobsonlawltd.com

4 Dated this 24th Day of May, 2022

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6 Jennifer Isso, Esq.  
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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  
14 Plaintiff,  
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16 vs.  
17  
18 TRAKETRA DANIELS,  
19  
20 Defendant.

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

***FAMILY DIVISION***

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

21 **PLEASE TAKE NOTICE** that an ORDER ON DISCOVERY  
22 COMMISSIONER'S REPORT AND RECOMMENDATIONS, attached hereto,  
23 was duly entered in the above-referenced case on the 12<sup>th</sup> day of April 2022.

24 DATED this 12<sup>th</sup> day of April 2022.

25 *Respectfully Submitted by:*  
26 JACOBSON LAW OFFICE, LTD

27 /s/ Rachel M. Jacobson, Esq.  
28 RACHEL M. JACOBSON, ESQ.  
Nevada Bar No. 007827  
64 North Pecos Road, Suite 200  
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 12<sup>th</sup> 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](mailto:ji@issohugheslaw.com)

*/s/ Carol Beitler, Legal Assistant*

---

An employee of JACOBSON LAW OFFICE, LTD.

1 ORDER

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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.

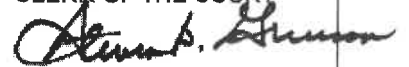
3                   IT IS HEREBY ORDERED that a hearing on the Discovery  
4                   Commissioner's Report is

5                   Set for the \_\_\_\_ day of \_\_\_\_\_, 2022 at \_\_\_\_ a.m. / p.m.

6                   Dated this 12th day of April, 2022

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

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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  
18 **I. FINDINGS**

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

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.



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.<sup>1</sup>

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

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25 <sup>1</sup> 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”);<sup>2</sup> *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 <sup>2</sup> 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,  
9

Case No.: D-20-609211-C

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](mailto:reli@jacobsonlawltd.com)

Jennifer Isso, Esq. - [ji@issohugheslaw.com](mailto: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  
4 CLARK COUNTY, NEVADA

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

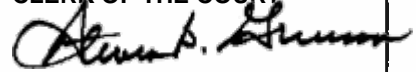
18 Jennifer Isso

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  
22 known addresses on 4/13/2022

23 Jennifer Isso

24 2470 St. Rose PKWY STE 306F  
25 Henderson, NV, 89074  
26  
27  
28



1 **COMP**  
2 **SMITH LEGAL GROUP**  
3 **Kurt A. Smith, Esq.**  
4 Nevada Bar No. 10764  
5 1701 N. Green Valley Parkway, Suite 8-E  
6 Henderson, Nevada 89074  
7 Telephone: (702) 410-5001  
8 Facsimile: (702) 410-5005  
9 info@thelegalsmith.com  
10 *Attorneys for Plaintiff*

CASE NO: D-20-609211-C  
Department: To be determined

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

11 HENRY E. GAAR,  
12 Plaintiff,

Case No.:  
Dept. No.:

13 vs.

**COMPLAINT FOR CHILD CUSTODY**

14 TRAKETRA DANIELS,  
15 Defendant.

16 COMES NOW THE PLAINTIFF, HENRY E. GAAR, by and through his  
17 Attorney of Record, Kurt A. Smith, Esq. of Smith Legal Group, and for his causes  
18 of action against the Defendant, Traketra Daniels, alleges as follows:  
19

20  
21 **I.**  
22 **JURISDICTION**

23 1. That for a period longer than six weeks prior to the date of filing of  
24 this Complaint, Dad has been, and now is, a bona fide and actual resident of the  
25 State of Nevada, actually and physically present and residing therein during all of  
26 said period of time.  
27  
28

SMITH LEGAL GROUP  
1701 N. GREEN VALLEY PARKWAY, SUITE 8-E  
HENDERSON, NEVADA 89074  
(702) 410-5001 FAX (702) 410-5005

1           2.     That the Child of this action has lived in Nevada for a period longer  
2  
3 than six months prior to the filing of Dad's Complaint such that Nevada has the  
4  
5 requisite Jurisdiction pursuant to the UCCJEA to enter Orders regarding Custody,  
6  
7 Visitation, and Support of the Child, pursuant to the Child's best interest.

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**II.**  
**FACTS**

3.     Plaintiff, HENRY E. GAAR ("Dad"), is the Biological Father of the  
minor Child, to wit: TRISTEN MALIK GAAR, born November 6, 2017. (the  
"Child").

4.     Defendant, TRAKETRA DANIELS ("Mom"), is the Natural Mother  
of the Minor Child.

5.     To the best of Dad's knowledge, there is currently no Custody Order  
defining Dad and Mom's rights and obligations related to the Child.

6.     Mom and Dad were never married. However, Dad and Mom had a  
four-year relationship and the Parties lived together throughout the majority of that  
relationship.

7.     Approximately a year ago, the Parties' relationship began to sour.  
Accordingly, Dad rented an apartment for Mom to see if the distance helped mend  
the relationship. However, although she had been provided with her own  
apartment, Mom still resided the majority of the time with Dad and the Child at  
Dad's residence.

1           8.     The Lease on the apartment Dad had secured for Mom expired and  
2     Dad offered to renew the apartment for Mom. However, because Mom was angry  
3     that she could not remain in Dad's home, Mom left behind both Dad's house and  
4     the offered apartment and is believed to be couch surfing with various friends.  
5

6           9.     Mom has refused to provide an address where she and the Child are  
7     residing.  
8

9           10.    Mom is refusing Dad access to the Child.  
10

11          11.    Mom is unstable and does not have a permanent home for she and the  
12     Child.  
13

14          12.    There is nothing more important to Dad than the Child. Although Dad  
15     believes Mom is capable of being a good mother, due to her current instability, Dad  
16     desires Sole Legal and Primary Physical Custody of the Child.  
17

18                               **III.**  
19                               **LEGAL CUSTODY**

20          13.    That Dad is a fit and proper person to have Sole Legal Custody of the  
21     Child, Tristen Malik Gaar.

22                               **IV.**  
23                               **PHYSICAL CUSTODY AND VISITATION**

24          14.    That Dad is a fit and proper person to be awarded Primary Physical  
25     Custody of the Child.

26          15.    That the Parties be put on notice of the requirements of NRS  
27     125C.0045(6), as follows:  
28

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

16. That the Parties be put on notice that the terms of the Hague Convention of October 25, 1980, adopted by the 14th Session of the Hague Conference on Private International Law, apply if a parent abducts or wrongfully retains a Child in a foreign country.

17. That the Parties be put on notice that pursuant to NRS 125C.0045(7)-(8);

If a parent of a Child lives in a foreign country or has significant commitments in a foreign country:

- i. The parties are also to acknowledge that the State of Nevada will be the habitual residence of the Child within the United States for the purposes of applying the terms of The Hague Convention as set forth in NRS 125C.0045(7).
- ii. Upon motion of one of the parties, the court may order the parent to post a bond if the court determines that the parent poses an imminent risk of wrongfully removing or concealing the Child outside the country of habitual residence. The bond must be in an

1 amount determined by the court and may be used only to pay for the  
2 cost of locating the Child and returning him/her to his/her habitual  
3 residence if the Child is wrongfully removed from or concealed  
4 outside the country of habitual residence. The fact that a parent has  
5 significant commitments in a foreign country does not create a  
6 presumption that the parent poses an imminent risk of wrongfully  
7 removing or concealing the Child.

8 18. That the Parties be put on notice that pursuant to the provisions of  
9 NRS 125C.006:

- 10 1. If primary physical custody has been established pursuant to an  
11 order, judgment, or decree of a court and the custodial parent  
12 intends to relocate his or her residence to a place outside of this  
13 State or to a place within this State that is at such a distance that  
14 would substantially impair the ability of the other parent to maintain  
15 a meaningful relationship with the Child, and the custodial parent  
16 desires to take the Child with him or her, the custodial parent shall,  
17 before relocating:
- 18 (a) Attempt to obtain the written consent of the noncustodial parent to  
19 relocate with the Child; and
  - 20 (b) If the noncustodial parent refuses to give that consent, petition the  
21 court for permission to relocate with the Child.
- 22 2. The court may award reasonable attorney's fees and costs to the  
23 custodial parent if the court finds that the noncustodial parent  
24 refused to consent to the custodial parent's relocation with the  
25 Child:
- 26 (a) Without having reasonable grounds for such refusal; or
  - 27 (b) For the purpose of harassing the custodial parent.
- 28 3. A parent who relocates with a Child pursuant to this section without  
the written consent of the noncustodial parent, or the permission of  
the court is subject to the provisions of NRS 200.359.

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**V.**  
**VISITATION**

19. That the Court should set a Visitation Plan for Mom, subject to the conditions placed upon Mom due to her not having a stable place for herself and the Child.

**VI.**  
**CHILD SUPPORT**

20. That Mom should pay Child Support to Dad at the rate of 16% of her Gross Monthly Income pursuant to NAC 425.140.

21. That the Parties be put on notice that, pursuant to NRS 125.450, a parent responsible for paying Child Support is subject to NRS 31A.025 to 31A.330, inclusive, and Sections 2 and 3 of Chapter 31A of the Nevada Revised Statutes, regarding the withholding of wages and commissions for the delinquent payment of support. These statutes and provisions require that, if a parent responsible for paying Child Support is delinquent in paying the support of a Child that such person has been ordered to pay, then that person's wages or commissions shall immediately be subject to wage assignment, pursuant to the provision of the above-cited statutes.

22. That pursuant to NRS 125B.145, the parties, and each of them, are hereby, placed on notice the order for support may be reviewed at any time on the basis of changed circumstances. For the purposes of this subsection, a change of 20 percent or more in the monthly income of a person who is subject to an order for

1 the support of a Child shall be deemed to constitute changed circumstances and  
2 require a review of modification of the order for the support of a Child. Moreover,  
3 also pursuant to NRS 125B.145, the parties are on notice that the order for support  
4 will be reviewed by the court at least every three (3) years to determine whether the  
5 order should be modified. The review will be conducted upon the filing of a request  
6 by a parent or legal guardian of the Child; or the Nevada State Welfare Division of  
7 the District Attorney's Office, if the Division of the District Attorney has  
8 jurisdiction of the case.

11  
12 **VII.**  
13 **MEDICAL INSURANCE**

14 23. That Mom and Dad should maintain medical, dental, optical,  
15 orthodontic insurance coverage for the Child as long as it is available through  
16 his/her individual employer at a reasonable cost and be solely responsible for any  
17 individual monthly premium costs, deductibles, co-pays, and medication  
18 maintenance on behalf of the Child.

19  
20 **VIII.**  
21 **ATTORNEYS' FEES**

22 24. That Mom should be solely responsible for Dad's attorney's fees and  
23 costs pursuant to NRS 18.010, NRS 125C.250 and Brunzell v. Golden Gate  
24 National Bank, 85 Nev. 345,455 P.2d 31 (1969).


25  
26 WHEREFORE, the Plaintiff, HENRY E. GAAR, prays for judgment as  
27 follows:  
28



1. That Dad be awarded Sole Legal Custody of the Child, Tristen Malik Gaar;
2. That Dad be awarded Primary Physical Custody of the Child, Tristen Malik Gaar;
3. That Mom be awarded Specific and limited Visitation with the Child;
4. That Mom be Ordered to pay Child Support;
5. That both Dad and Mom shall maintain medical, dental, optical, orthodontic insurance coverage for the Child as stated herein;
6. That the Parties each be solely responsible for their individual attorney's fees and costs. However, if Mom opposes Dad's reasonable requests for relief as stated herein, that Mom be ordered to pay Dad's full attorneys' fees and costs in this matter pursuant to NRS 18.010, NRS 125C.250 and *Brunzell*; and
7. That the Dad be granted any further relief as the Court deems just and proper.

DATED this 18 day of June 2020.

SMITH LEGAL GROUP

  
Kurt A. Smith, Esq.  
Nevada Bar No. 10764  
1701 N. Green Valley Parkway, Suite 8-E  
Henderson, Nevada 89074  
*Attorneys for Plaintiff*

SMITH LEGAL GROUP  
1701 N. GREEN VALLEY PARKWAY, SUITE 8-E  
HENDERSON, NEVADA 89074  
(702) 410-5001 FAX (702) 410-5005

**VERIFICATION OF COMPLAINT**

STATE OF NEVADA     )  
  ) ss.  
COUNTY OF CLARK    )

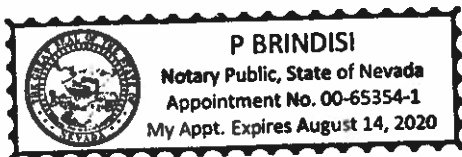
HENRY E. GAAR, being first duly sworn, deposes and says under penalty of perjury of the laws of the State of Nevada:

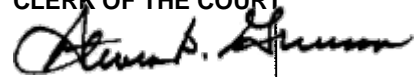
That I am the Plaintiff in the above-entitled action; that I have read the foregoing Complaint for Child Custody and I know the contents thereof; that the same is true of my own knowledge, except as to those matters therein stated on information and belief, and as to those matters, I believe them to be true.

  
HENRY E. GAAR

SUBSCRIBED and SWORN to before me this 15 day of June 2020.

  
NOTARY PUBLIC





**NED**  
ROCHELEAU LAW GROUP  
dba RIGHT LAWYERS  
Meredith L. Weiner, Esq.  
Nevada Bar No. 12299  
meredith@rightlawyers.com  
600 South Tonopah Drive, Suite 300  
Las Vegas, Nevada 89106  
702-914-0400  
Attorney for Plaintiff

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

Henry E Gaar,

Plaintiff,

vs.

Traketra Daniels,

Defendant.

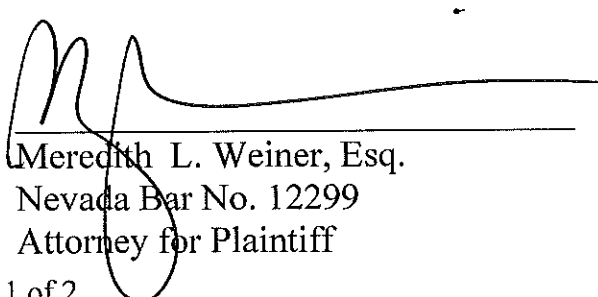
CASE NO. : D-20-609211-C  
DEPT. NO. : H

**NOTICE OF ENTRY OF DECREE**

Please take notice that the Decree of Custody was entered in the above-entitled matter on **January 19, 2021**, a copy of which is attached hereto.

Dated this 19<sup>th</sup> day of January 2021.


**RIGHT Lawyers**

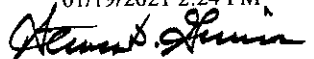


Meredith L. Weiner, Esq.  
Nevada Bar No. 12299  
Attorney for Plaintiff

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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 Eight Judicial District Court,” by mandatory electronic service through the Eight Judicial District Court’s electronic filing system:

  
An employee of Right Lawyers

  
CLERK OF THE COURT

1 **DECD**  
2 **ROCHELEAU LAW GROUP**  
3 dba **RIGHT LAWYERS**  
4 Meredith L. Weiner, Esq.  
5 Nevada Bar No. 12299  
6 meredith@rightlawyers.com  
7 600 South Tonopah Drive, Suite 300  
8 Las Vegas, Nevada 89106  
9 702-914-0400  
10 Attorney for Plaintiff

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

7 Henry E. Gaar,

8 Plaintiff,

9 vs.

10 Traketra Daniels,

11 Defendant.

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

12 **STIPULATED DECREE OF CUSTODY**

13 **COMES NOW** the Plaintiff, Henry Gaar, by and through his attorney of  
14 record, Meredith L. Weiner, Esq., of **RIGHT LAWYERS**, and Defendant,  
15 Traketra Daniels, by and through her attorney of record, Gerald Neal, Esq., to  
16 submit to the court this stipulated Decree of Custody. After a review of the  
17 pleadings and papers on file and the testimony given, if any, this Court finds as  
18 follows:

1           1.     That The Court has jurisdiction over the parties and over the subject  
2 matter as Plaintiff has been a resident of the State of Nevada for more than six  
3 weeks prior to the filing of the Complaint for Custody and intends to remain in  
4 Nevada for the foreseeable future. Plaintiff is and has been at all times relevant  
5 a resident of Clark County, Nevada.

6           2.     That Plaintiff and Defendant were never married.

7           3.     The Plaintiff and Defendant have one (1) minor child born of this  
8 relationship, to wit: Tristen Malik Gaar, born November 6, 2017. That the  
9 parties have no other children in common, and The Defendant is not pregnant at  
10 this time.

11           4.     The minor child has resided in Nevada for at least six months prior  
12 to the commencement of this action. Further, Nevada is the child's habitual  
13 residence. Therefore, the Court has the necessary UCCJEA jurisdiction over the  
14 child to enter orders as to child custody and visitation.

15           5.     Plaintiff and Defendant are both fit and proper parents to share joint  
16 legal custody of the minor child.

17           6.     Plaintiff and Defendant are both fit and proper parents to share joint  
18 physical custody of the minor child.

1        7.     The Plaintiff and Defendant have entered into an agreement settling the  
2 issue of child custody, and visitation. Any custody and visitation orders made  
3 herein are in the best interests of the child.

4        8.     That the Plaintiff and Defendant should be granted a Decree of  
5 Custody.

6        **NOW THEREFORE, IT IS HEREBY STIPULATED THAT** Plaintiff and  
7 Defendant waive their rights to an appeal, to Findings of Fact and Conclusions of  
8 Law.

9        **IT IS FURTHER STIPULATED THAT** Plaintiff and Defendant declare  
10 that they have carefully read this Decree of Custody and know the contents thereof.  
11 This Agreement is made and entered into freely and voluntarily by each of the  
12 Petitioners hereto, free from any duress, constraint or influence of any kind or nature  
13 on the part of the other and each acting absolutely upon his or her own independent  
14 judgment.

15        **NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED,**  
16 **AND DECREED** that the terms, as they are set forth in the attached hereto as  
17 Exhibit "A" are hereby ratified, confirmed, merged, and incorporated into this  
18 Decree as though fully set forth herein.

19        **IT IS FURTHER ORDERED THAT** Plaintiff and Defendant shall have  
20 both joint legal and joint physical custody of the minor child with a visitation

1 schedule as outlined in Exhibit A, pursuant to NRS 125C.010, which is  
2 incorporated herein.

3 **IT IS FURTHER ORDERED THAT** pursuant to NAC 425, the base  
4 statutory child support obligation is \$900.00 per month based on the parties'  
5 respective incomes and the joint physical custody designation. However, the  
6 Plaintiff agrees to an upward deviation in the amount of \$700 per month,  
7 therefore making the Plaintiff's child support obligation to the Defendant \$1,600  
8 per month in child support. Child support shall continue until the minor child  
9 reaches eighteen (18) years of age if no longer in high school, or if the child is  
10 still enrolled in high school, when that child reaches nineteen (19) years of age,  
or becomes emancipated or otherwise self-supporting.

11 **IT IS FURTHER ORDERED THAT** no child support arrearages exist,  
12 or the entitled custodial parent waived his/her right to child support arrearages.

13 **IT IS FURTHER ORDERED THAT** good cause exists to postpone the  
14 withholding of income from the obligor parent to pay child support and spousal  
support, if any.

15 **IT IS FURTHER ORDERED THAT** the minor child shall be allowed to  
16 facetime for up to ten (10) minutes with the other parent at least once during their  
17 visitation with the child. This time shall be mutually agreed upon by both parents.  
18



1       **IT IS FURTHER ORDERED THAT** the parties shall inform one another  
2 of the physical location of the minor child, this includes any out of state trips.

3       **IT IS FURTHER ORDERED THAT** the Plaintiff shall have fourteen  
4 (14) to twenty-one (21) days of business travel a year. During this time the  
5 Defendant shall have the minor child. The plaintiff is to provide a thirty (30) day  
6 notice to Defendant before scheduling. Additionally, the Plaintiff shall be  
7 responsible for any daycare cost needed during this time.

8       **IT IS FURTHER ORDERED THAT** pursuant to NRS 125B.080(7),  
9 both parties shall maintain medical and dental insurance for the child. The 30/30  
10 rule applies to any unreimbursed medical, dental, optical, orthodontic, surgical,  
11 and/or any other healthcare costs for the child. The 30/30 rule provides that the  
12 party paying any unreimbursed medical expenses has thirty (30) days from the  
13 date the expense is paid to forward proof of payment to the opposing party. If  
14 that party does not timely forward the proof of payment, then that party waives  
15 the right to be reimbursed for that expense. Upon receipt of a timely-forwarded  
16 proof of payment of an unreimbursed medical expense, the receiving party has  
17 thirty (30) days to reimburse the paying party one-half of the expense or to object  
18 to the expense. If the receiving party does not either object to the expense or  
reimburse the paying party for half of the expense, then that party is subject to  
sanctions for contempt of court.

1       **IT IS FURTHER ORDERED THAT** the Plaintiff shall claim the child  
2 dependent tax credit for the child in odd-numbered tax years and the Defendant  
3 shall claim the child dependent tax credit in even-numbered tax years.

4       **IT IS FURTHER ORDERED THAT** that should either party need to  
5 enforce the terms of this Decree of Custody, the prevailing party shall be entitled  
6 to recover attorney's fees and costs related to such action.

7       **NOTICE IS HEREBY GIVEN** that pursuant to NRS 125C.0045(6):

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

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1 **NOTICE IS HEREBY GIVEN** that pursuant to NRS 125C.0045(7)(8):

2 The terms of the Hague Convention of October 25, 1980, adopted by  
3 the 14th Session of the Hague Conference on Private International Law,  
4 apply if a parent abducts or wrongfully retains a child in a foreign  
country as follows:

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

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

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

12 **NOTICE IS HEREBY GIVEN** that, pursuant to NRS 125C.0065:

13 1. IF JOINT PHYSICAL CUSTODY has been established pursuant  
to an order, judgment or decree of a court and one parent intends to  
14 relocate his or her residence to a place outside of this State or to a place  
within this State that is at such a distance that would substantially  
15 impair the ability of the other parent to maintain a meaningful  
relationship with the child, and the relocating parent desires to take the  
child with him or her, the relocating parent shall, before relocating:

16 (a) Attempt to obtain the written consent of the non-relocating parent  
to relocate with the child; and

17 (b) If the non-relocating parent refuses to give that consent, petition the  
court for primary physical custody for the purpose of relocating.

18 2. The court may award reasonable attorney's fees and costs to the  
relocating parent if the court finds that the non-relocating parent refused  
to consent to the relocating parent's relocation with the child:

1 (a) Without having reasonable grounds for such refusal, or;

(b) For the purpose of harassing the relocating parent.

2 3. A parent who relocates with a child pursuant to this section before  
the court enters an order granting the parent primary physical custody  
3 of the child and permission to relocate with the child is subject to the  
provisions of NRS 200.359.

4 **NOTICE IS HEREBY GIVEN** that the parties may be subject to the  
5 withholding of wages and commissions for delinquent payments of support  
6 pursuant to NRS 31A.010, *et. seq.* and 125.450(2).

7 **NOTICE IF HEREBY GIVEN** that both parties shall submit the  
8 information required in NRS 125B.055, NRS 125.30, and NRS 125.230 on a  
9 separate form to the Court and the Welfare Division of the Department of Human  
10 Resources within ten days from the date this Order is filed. Such information  
11 shall be maintained by the Clerk in a confidential manner and not part of the  
12 public record. The parties shall update the information filed with the Court and  
13 the Welfare Division of the Department of Human Resources within ten days  
should any of that information become inaccurate.

14 ///

15 ///

16 ///

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18 ///

1 NOTICE IS HEREBY GIVEN that either party may request a review of  
2 child support every three years, or at any time upon changed circumstances,  
3 pursuant to NRS 125B.145.

4 IT IS SO ORDERED. THIS IS A FINAL DECREE

Dated this 19th day of January, 2021  
Dated this 17 day of Jan 2020

*T. Arthur Ritchie*

DISTRICT COURT JUDGE  
D5A 08D BC0D C7CE  
T. Arthur Ritchie  
District Court Judge

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7 Dated this \_\_\_\_ day of \_\_\_\_ 2021 Dated this \_\_\_\_ day of \_\_\_\_ 2021

8  
9 *Henry Gaar*  
Henry Gaar, Plaintiff

*Traketa Daniels*  
Traketa Daniels, Defendant

10 Dated this 14<sup>th</sup> day of January 2021

Dated this 14<sup>th</sup> day January 2021

11 *Meredith L. Weiner*  
12  
13 Meredith L. Weiner, Esq.  
Nevada Bar No. 12299  
600 South Tonopah Drive, Suite 300  
14 Las Vegas, Nevada 89106  
Attorneys for Plaintiff

*Gerald F. Neal*  
15  
16 Gerald F. Neal, Esq.  
Nevada Bar No. 353  
6765 W. Charleston Blvd., #130  
17 Las Vegas, Nevada 89146  
Attorney for Defendant

1 **Exhibit A**

2 **Regular Schedule Agreement**

3 The parent's regular visitation schedule shall be as follows;

4 **Sample; Alternating Week**

5 As the Parties are awarded Joint Physical Custody of the minor child, the  
6 schedule will consist of the Plaintiff having visitation with the minor child every  
7 other week starting Monday at 9:00 a.m. until that Friday at 6:00 p.m. The minor  
8 child shall reside with the Defendant the remaining time.

9 Visitation exchanges shall occur at a mutually agreed upon public location.  
10 Once the child enrolls in school, visitation exchanges will occur at school with  
11 the relinquishing parent dropping the child off at school in the morning and the  
12 receiving party picking the child up from school.

13 There shall be a six-hour right of first refusal when the custodial parent is  
14 working. Upon knowledge that the custodial parent will not be personally able  
15 to care for the child(ren) for any six-hour or larger block of time, that parent  
16 must, within a reasonable amount of time, so inform the other parent and allow  
17 that parent the first right to refuse visitation with the child(ren) for the time that  
18 the other parent is unable to care for the child(ren). If the non-custodial parent  
accepts, then the parties shall make arrangements to exchange the child(ren).  
Upon the offering parent becoming available to personally care for the  
child(ren), the accepting parent shall return the child(ren). If the non-custodial

parent refuses the right, then the custodial parent may make other arrangements for the child(ren). The right of first refusal is only available if the non-custodial parent is not working on the day the custodial parent is offering the right of first refusal.

### **Holiday Schedule Agreement**

The parent's holiday and vacation provisions set forth below, with the following periods to take precedence over regularly scheduled residential time:

#### **Three Day Weekend Holidays**

The parents will share weekend holidays based on the following schedule, with residential time to begin upon the release of school prior to the holiday and continue until the morning school resumes following the holiday. In the event that school is not in session, the following holiday times will begin at 9 a.m. and continue until the following morning at 9 a.m.

	<u>Odd Year</u>	<u>Even Year</u>
Martin Luther King Day	DAD	MOM
President's Day	MOM	DAD
Memorial Day	DAD	MOM
Independence Day	MOM	DAD
Labor Day	DAD	MOM
Nevada Admission Day	MOM	DAD

#### **Individual Holidays**

The parents will birthdays based on the schedule set forth below, with residential time to begin upon the release of school on the day listed and continue until the

1 morning school resumes following the specified day. In the event that school is  
2 not in session, the following holiday times will begin at 9 a.m. and continue until  
the following morning at 9 a.m.

	<u>Odd Year</u>	<u>Even Year</u>
3 Father's Day	DAD	DAD
4 Mother's Day	MOM	MOM
5 Mother's Birthday	MOM	MOM
6 Father's Birthday	DAD	DAD
7 Children's Birthday	MOM	DAD

8  
9 **Easter/Spring Break:**

10 The parents will share the Easter/Spring Break based on the following schedule,  
with residential time to begin upon the release of school prior to the holiday and  
continue until the morning school resumes following the holiday.

	<u>Odd Year</u>	<u>Even Year</u>
11 Easter/Spring Break	MOM	DAD

12 **Thanksgiving:**

13 The parents will share the Thanksgiving Break based on the following schedule,  
with residential time to begin immediately upon the release of school prior to  
14 the holiday [Wednesday] and continue until the morning school resumes  
following the holiday.

	<u>Odd Year</u>	<u>Even Year</u>
15 Thanksgiving	DAD	MOM

17 **Christmas/New Year's:**

18 This holiday period will be divided into two segments. The first segment will  
begin upon the release of school for the break and continue until December 25<sup>th</sup>



1 at 2:00 p.m., when the second segment will begin, to continue until the morning  
2 school resumes following the holiday break.

	<u>Odd Year</u>	<u>Even Year</u>
3 First Segment/Christmas	DAD	MOM
4 Second Segment/New Year's	MOM	DAD

5 **Summer Vacation:**

6 The parents will maintain their regular residential schedule during the summer,  
7 with each party to elect a two-week vacation period with the children. Each  
8 parent will provide at least a thirty-day written notice of the dates of their  
9 requested vacation period. In the event there is a conflict in dates/times, the  
10 earliest dated email will prevail.

11 **Any additional time with the children shall be by mutual agreement of both**  
12 **parents.**

1 CSERV

2 DISTRICT COURT  
3 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 Custody Decree / Order was served via the court's electronic eFile  
13 system to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 1/19/2021

15 Gerald Neal

geraldfneal@aol.com

16 Meredith Weiner

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17 Right Lawyers

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18 Kurt Smith

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