

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

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ADAM MICHAEL SOLINGER,

Appellant,

vs.

CHALESE MARIE SOLINGER,

Respondent.

) Case No.: 84832-COA

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**APPELLANT'S APPENDIX
VOLUME 1**

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Appellant's Appendix* was filed electronically with the Clerk of the Court of Appeals of Nevada in the above-entitled matters on Monday, November 21, 2022. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

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/s/ David J. Schoen, IV, ACP
An employee of The Abrams & Mayo Law Firm

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11/02/2022	Transcript from March 2, 2022 Evidentiary Hearing (Trial Day 4)	21	4403 - 4669
11/02/2022	Transcript from March 3, 2022 Evidentiary Hearing (Trial Day 5)	22	4670 - 4770
01/25/2022	Transcript from May 10, 2021 Evidentiary Hearing (Trial Day 1)	16	3416 - 3574


CLERK OF THE COURT

1 **COM**
2 ADAM M. SOLINGER, ESQ.
3 Nevada Bar No.: 13963
4 **LAS VEGAS DEFENSE GROUP, LLC.**
5 2970 West Sahara Avenue
6 Las Vegas, Nevada 89102
7 Tel: (702) 378-2407
8 Fax: (702)974-0524

9 **EIGHTH JUDICIAL DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 ADAM M. SOLINGER

12 Plaintiff,

13 vs.

14 CHALESE M. SOLINGER,

15 Defendant.

CASE NO: D-19-582245-D
DEPT NO: Dept. I

16 **COMPLAINT FOR DIVORCE**

17 COMES NOW, Plaintiff, ADAM M. SOLINGER, and states his cause of action
18 against Defendant, CHALESE M. SOLINGER, as follows:

19 I. That Plaintiff is a resident of the State of Nevada, and for a period of more than
20 six weeks before commencement of this action has resided and been physically present
21 and domiciled therein, and during all of said period of time, Plaintiff has had, and still
22 has, the intent to make said State of Nevada, his home, residence, and domicile for an
23 indefinite period of time.

24 II. That Plaintiff and Defendant were married in Clark County, Nevada on or about
25 the 12th day of May of 2012 and are husband and wife.

26 III. That there are two (2) minor children of the marriage, to-wit: Michael Adam
27 Solinger, born June 16, 2015, now age 3; and Marie Leona Solinger, born August 28,
28 2017, now age 1. There are no adopted children, and to the best of Plaintiff's knowledge,

1 Defendant is not now pregnant.

2 IV. That the parties should be granted joint legal care, custody, and control of said
3 minor children.

4 V. That the Plaintiff should be awarded primary physical care, custody, and control
5 of said minor children because upon information and belief Defendant intends to relocate
6 to Pahrump, Nevada. The specifics of a holiday schedule are requested to be the standard
7 even and odd arrangement.

8 VI. That child support should be established for said minor children, pursuant to
9 statute and applicable case law, until such time as the children, respectively, (1) become
10 emancipated, or (2) attain the age of eighteen (18) years, the age of majority, unless the
11 child is still attending secondary education when the child reaches eighteen (18) years of
12 age, in which event child support payments shall continue until the child graduates from
13 high school, or attains the age of nineteen (19) years, whichever event occurs first.

14 VII. That Plaintiff is capable of continuing to provide major medical insurance
15 coverage for the minor children herein, with the parties equally dividing the cost thereof,
16 and all medical, dental (including orthodontic), psychological and optical expenses of
17 said minor children not covered by said insurance, until such time as the children,
18 respectively, (1) become emancipated, or (2) attain the age of eighteen (18) years, the age
19 of majority, unless the child is still attending secondary education when the child reaches
20 eighteen (18) years of age, in which event said medical coverage shall continue until the
21 child graduates from high school, or attains the age of nineteen (19) years, whichever
22 event occurs first. Additionally, the Court should order the 30/30 Rule for payment of all
23 unreimbursed medical and/or dental expenses.

24 VIII. That the tax deduction should be given to the Plaintiff as he is seeking
25 primary physical custody.

26 IX. That Plaintiff does not agree that spousal support is appropriate in this case.

27 X. That the community property of the parties herein to be adjudicated by the Court,
28

1 the nature and extent of which may not be fully known to Plaintiff at this time, which
2 includes but is not limited to, the following:

- 3 a. The marital residence located at 8500 Highland View Ave, Las Vegas,
4 Nevada 89145, of which a portion of the house consists of a separate gift
5 of equity from Michael Solinger to Adam Solinger, titled in the name of
6 Adam Solinger and Chalese Solinger, and subject to the mortgage thereon;
- 7 b. Joint bank and investment accounts, including accounts at Bank of
8 America;
- 9 c. Plaintiff's retirement plans including an ADP ROTH 401k subject to a
10 QDRO analysis;
- 11 d. Such other assets as may be determined through ongoing discovery during
12 the course of this action; and
- 13 e. Household furniture, furnishings, and other personal property obtained
14 during the parties' marriage.

15
16 XI. That there are community debts of the parties herein to be adjudicated by the
17 Court, the nature and extent of which may not be fully known to Plaintiff at
18 this time, which includes, but is not limited to, the following:

- 19 a. Any joint credit card debits.

20 XII. That there may be separate property of Plaintiff, which should be confirmed to
21 him, including but not limited to the following:

- 22 a. Plaintiff's personal property acquired prior to the marriage; and
- 23 b. Plaintiff's clothing, jewelry, and other personalities.

24 XIII. That Plaintiff requests this Court to jointly restrain the parties herein in
25 accordance with the terms of the Joint Preliminary Injunction to be issued
26 herewith.

27 XIV. That Plaintiff does not request a name change.

28 XV. That the parties hereto are incompatible in marriage.

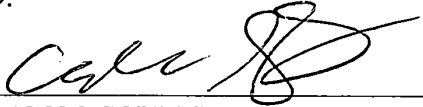
1 WHEREFORE, Plaintiff prays judgment as follows:

- 2 1. That the bonds of matrimony now and heretofore existing between Plaintiff and
3 Defendant be dissolved; that Plaintiff be granted an absolute Decree of Divorce;
4 and that each of the parties hereto be restored to the status of a single, unmarried
5 person;
- 6 2. That the parties be awarded joint legal care, custody, and control of the minor
7 children herein;
- 8 3. That Plaintiff be awarded primary physical care, custody, and control of the minor
9 children.
- 10 4. That child support should be established for said minor children, pursuant to
11 statute and applicable case law, until such time as the children, respectively, (1)
12 become emancipated, or (2) attain the age of eighteen (18) years, the age of
13 majority, unless the child is still attending secondary education when the child
14 reaches eighteen (18) years of age, in which event child support payments shall
15 continue until the child graduates from high school, or attains the age of nineteen
16 (19) years, whichever event occurs first.
- 17 5. For the Court to confirm that Plaintiff shall continue to maintain major medical
18 insurance coverage for the minor children herein until such time as the children,
19 respectively, (1) become emancipated, or (2) attain the age of eighteen (18) years,
20 the age of majority, unless the child is still attending secondary education when
21 the child reaches eighteen (18) years of age, in which event child support
22 payments shall continue until the child graduates from high school, or attains the
23 age of nineteen (19) years, whichever event occurs first.
- 24 6. For the Court to order that the parties equally divide all medical, dental (including
25 orthodontic), psychological, or optical expenses of said minor children not
26 covered by insurance, until such time as the children, respectively, (1) become
27 emancipated, or (2) attain the age of eighteen (18) years, the age of majority,
28

1 unless the child is still attending secondary education when the child reaches
2 eighteen (18) years of age, in which event child support payments shall continue
3 until the child graduates from high school, or attains the age of nineteen (19)
4 years, whichever event occurs first and that unreimbursed medical and/or dental
5 expenses be subject to the 30/30 rule

- 6 7. For the Court to refrain from ordering alimony/spousal support in this case.
7
8 8. That this Court makes an equitable division of the community assets;
9
10 9. That this Court make an equitable division of the community obligations;
11
12 10. That this Court confirm to each party his/her separate property and debts;
13
14 11. That this Court issue its Joint Preliminary Injunction enjoining the parties
15 pursuant to the terms stated therein;
16
17 12. For such other and further relief as the Court may deem just and proper in the
18 premises.
19

20 DATED this 4th day of January, 2019.

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ADAM M. SOLINGER, ESQ.
Nevada Bar No. 13963
2970 West Sahara Avenue
Las Vegas, Nevada 89102

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VERIFICATION

STATE OF NEVADA)
COUNTY OF CLARK) SS:

ADAM M. SOLINGER, being first duly sworn, deposes and says:

That I am the Plaintiff herein; that I have read the foregoing Complaint for Divorce and the same is true of my own knowledge, except for those matters which are therein stated upon information and belief, and as to those matters, I believe them to be true.


ADAM M. SOLINGER

SUBSCRIBED AND SWORN to before me by Adam M. Solinger
this 4 day of January, 2019.


NOTARY PUBLIC in and for said
County and State



Electronically Filed
01/04/2019


CLERK OF THE COURT

REQT

Name: Adam M. Solinger

Address: 2970 W. Sahara Ave

Las Vegas, NV 89102

Telephone: 702-378-2407

Email Address: adam@702defense.com

In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Adam M. Solinger

Plaintiff,

vs.

Chalese M. Solinger

Defendant.

CASE NO.

D-19-582245-D

DEPT:

Dept. I

REQUEST FOR ISSUANCE OF JOINT PRELIMINARY INJUNCTION

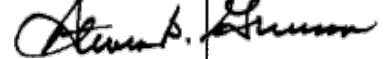
I respectfully request that the Court issue a Joint Preliminary Injunction in the above-entitled action pursuant to EDCR 5.517.

DATED January 4, 2019

Submitted By: ▶



(print your name) Adam M. Solinger



SUMM

Plaintiff's Name: Adam M. Solinger

Address: 2970 W. Sahara Ave

Las Vegas, NV 89102

Telephone: 702-378-2407

Email Address: adam@702defense.com

In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

Adam M. Solinger

Plaintiff,

vs.

Chalese M. Solinger

Defendant.

CASE NO.: _ D-19-582245-D

DEPT: _ Dept. I

SUMMONS

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND IN WRITING WITHIN 20 DAYS. READ THE INFORMATION BELOW VERY CAREFULLY.

To the Defendant named above:

A civil complaint or petition has been filed by the Plaintiff against you for the relief as set forth in that document (see the complaint or petition). The object of this action is: *(check one)*

☒ Divorce.

☐ Annulment.

☐ Legal Separation.

☐ Custody, Paternity, Visitation, and/or Child Support.

☐ Other: _____

1 If you intend to defend this lawsuit, within 20 days after this summons is served on you
2 (not counting the day of service), you must:

- 3 1. File with the Clerk of Court, whose address is shown below, a formal written answer to
4 the complaint or petition.
5 2. Pay the required filing fee to the court, or file an Application to Proceed *In Forma*
6 *Pauperis* and request a waiver of the filing fee.
7 3. Serve a copy of your answer upon the Plaintiff whose name and address is shown below.
8

9
10 If you fail to respond, the Plaintiff can request your default. The court can then enter a
11 judgment against you for the relief demanded in the complaint or petition.

12 STEVEN D. GRIERSON
13 CLERK OF COURT

14 By: Danya Mulvan 1/4/19
15 Deputy Clerk Date

16 Family Courts and Services Center
17 601 North Pecos Road
18 Las Vegas, Nevada 89155

19 Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89155

20 Issued on Behalf of Plaintiff:

21 Plaintiff's Name: Adam M. Solinger
22 Address: 2970 W. Sahara Ave
23 City, State, Zip Las Vegas, NV 89102



24 Information and forms to assist you are available, free of charge, at
25 the Family Law Self-Help Center at the Family Courts and Services
Center, 601 N. Pecos Road, Las Vegas, Nevada, and on the center's
website at www.familylawselfhelpcenter.org.

PSER
LAS VEGAS DEFENSE GROUP
2970 W. SAHARA AVE.
Las Vegas, NV 89102
702-333-3673
Attorney for: Plaintiff



Electronically Filed
1/9/2019 4:30 PM
Steven D. Grierson
CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY NEVADA

ADAM M. SOLINGER

Plaintiff

CHALESE M. SOLINGER

Defendant

Case Number: **D-19-582245-D**

Dept/Div: I

PROOF OF SERVICE

TINA J. SANCHEZ, being duly sworn deposes and says: that at all times herein affiant was and is a citizen of the United States, over 18 years of age, licensed to serve civil process in the state of Nevada under license #389, and not a party to or interested in the proceeding in which this affidavit is made. The affiant received on Monday January 07 2019; 1 copy(ies) of the:

**SUMMONS; COMPLAINT FOR DIVORCE; REQUEST FOR ISSUANCE OF JOINT
PRELIMINARY INJUNCTION; JOINT PRELIMINARY INJUNCTION**

I served the same on Monday January 07 2019 at 06:55PM by:

Serving Defendant CHALESE M. SOLINGER

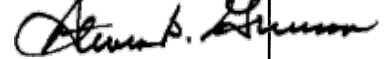
by serving: CHALESE M. SOLINGER at the Defendant's Home located at 8500 HIGHLAND VIEW AVE, LAS VEGAS, NV 89145.

Pursuant to NRS 53.045, I declare under the penalty of perjury under the law of the State of Nevada that the forgoing is true and correct.

Executed: Tuesday January 08 2019

Affiant: TINA J. SANCHEZ #R-038221
LEGAL WINGS, INC. - NV LIC #389
1118 FREMONT STREET
Las Vegas, NV 89101
(702) 384-0305, FAX (702) 384-8638

8564400.580079



JPI

DISTRICT COURT
CLARK COUNTY, NEVADA

ADAM MICHAEL SOLINGER, PLAINTIFF CASE NO: D-19-582245-D
VS.
CHALESE MARIE SOLINGER,
DEFENDANT.

DEPARTMENT I

JOINT PRELIMINARY INJUNCTION

Notice: This injunction is effective upon the requesting party when issued and against the other party when served. This injunction shall remain in effect from the time of its issuance until trial or until dissolved or modified by the court.

TO: Plaintiff and Defendant:

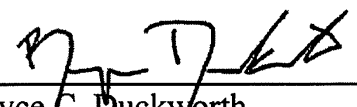
PURSUANT TO EIGHTH JUDICIAL COURT RULE 5.517, YOU, AND ANY OFFICERS, AGENTS, SERVANTS, EMPLOYEES OR A PERSON IN ACTIVE CONCERT OR PARTICIPATION WITH YOU, ARE HEREBY PROHIBITED AND RESTRAINED FROM:

1. Transferring, encumbering, concealing, selling or otherwise disposing of any of your joint, common or community property of the parties or any property which is the subject of a claim of community interest, except in the usual course of conduct or for the necessities of life or for retention of counsel for the case in which this Injunction is obtained; or cashing, borrowing against, canceling, transferring, disposing of, or changing the beneficiaries of;
 - a. Any retirement benefits or pension plan held for the benefit (or election for benefit) of the parties or any minor child; or
 - b. Any insurance coverage, including life, health, automobile, and disability coverage;
- without the written consent of the parties or the permission of the court.

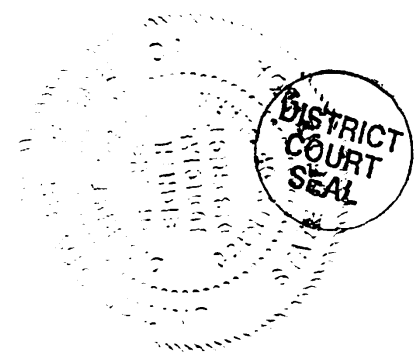
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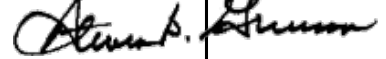
2. Molesting, harassing, stalking, disturbing the peace of or committing an assault or battery on the person of the other party or any child, stepchild, other relative or family pet of the parties.
3. Relocating any child of the parties under the jurisdiction of the State of Nevada from the state without the prior written consent of all parties with custodial rights or the permission of the court.

DATED this 4th day of January, 2019:



Bryce C. Duckworth
Presiding Judge, Family Division





1 DFLT

2 Name: Adam M. Solinger

3 Address: 2970 W. Sahara Ave.

4 City, State, Zip: Las Vegas, NV 89102

5 Phone: 702-378-2407

6 Email: adam@702defense.com

7 Self-Represented

8 **DISTRICT COURT**
CLARK COUNTY, NEVADA

9 **Adam M. Solinger**

10 Plaintiff,

11 vs.

12 **Chalese M. Solinger**

13 Defendant.

CASE NO.: D-19-582245-D

DEPT: I

DEFAULT

14
15 It appearing from the files and records in the above entitled action that (name of
16 Defendant), Chalese M. Solinger, Defendant herein, being
17 duly served with a copy of the Summons and Complaint on (date the Defendant was served)
18 (month) January (day) 7, 2019; that more than 20 days,
19 exclusive of the date of service, having expired since service upon the Defendant; that no answer
20 or other appearance having been filed and no further time having been granted, the default of the
21 above-named Defendant for failing to answer or otherwise plead to Plaintiff's Complaint is
22 hereby entered.

23 STEVEN D. GRIERSON, CLERK OF COURT

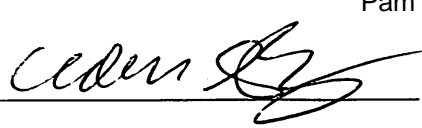
24 By:

Deputy Clerk
Pam Woolery

1/29/2019

Date

25 Submitted By: ▶

26 
27 (☒ check one) ☒ Plaintiff / ☐ Defendant in Proper Person
28



AFFT

Name: Adam M. Solinger
Address: 2970 W. Sahara Ave.
Las Vegas, NV 89102
Telephone: 702-378-2407
Email Address: adam@702defense.com
In Proper Person

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Adam Michael Solinger
Plaintiff,

vs.

Chalese Marie Solinger
Defendant.

CASE NO.: D-19-582245-D

DEPT: I

AFFIDAVIT OF RESIDENT WITNESS

I, *(resident witness' name)* Adam Michael Solinger, swear under
penalty of perjury that the following statements are true and correct.

1. I am over the age of eighteen (18) and competent to testify of my own knowledge to
the following.

2. I have lived in the State of Nevada for *(number)* 7 years and currently live
at *(street, city, state)* 7100 Grand Montecito Parkway #2021 Las Vegas, NV.

I intend to live in the State of Nevada for the foreseeable future.


3. To my personal knowledge, *(name of spouse whose residency is being established)*
Chalese Marie Solinger lives at *(street, city, state)*
8500 Highland View Ave Las Vegas, NV 89145

and has been physically living within the State of Nevada on a daily basis for at least
six (6) weeks prior to the filing of this action.

4. To my personal knowledge, *(name of spouse whose residency is being established)*
Chalese Marie Solinger has physically lived in the State of Nevada
since *(date)* July 2011.
5. I see the named party an average of *(number)* 1 times per week.
6. I know the named party because *(explain how you know the spouse)*
We were in a dating relationship since July of 2008
and moved here in July 2011.
7. I know of my own personal knowledge that *(name of person whose residency is being established)* Chalese Marie Solinger is a bona fide resident of the
State of Nevada.

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

Executed on *(date)* 1/31/19.

(Signature) ▶ 
(Printed Name) Adam Michael Solinger

Adam M. Solinger
CLERK OF THE COURT

MISC
ADAM M. SOLINGER
2970 W. Sahara Ave
Las Vegas, NV 89102
702-378-2407
Adam@702defense.com
In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

Adam Michael Solinger

Plaintiff,

vs.

Chalese Marie Solinger

Defendant.

Case No.: D-19-582245-D

Dept. No.: I

CERTIFICATE OF COMPLETION COPE CLASS

Attached as exhibit A is a certificate of completion for the COPE class.

DATED this 15th day of February, 2019.

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

Adam M. Solinger (signature)

Adam M. Solinger
2970 W. Sahara Ave
Las Vegas, NV 89102
702-378-2407
adam@702defense.com

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EXHIBIT A



Extended Learning Center, Inc.®
PO BOX 3804
Paso Robles, CA 93447-3804
(866) 504-2883

CERTIFICATE OF COMPLETION

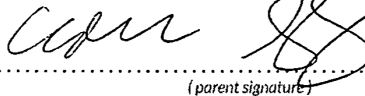
This certifies that

Adam Solinger

has successfully completed the

Co-Parenting CARE Program

I certify under penalty of perjury that the foregoing is true & correct.


.....
(parent signature)

Date of Registration **Jan 29, 2019**
Date of Completion **Jan 31, 2019**
Court Case Number **D-19-582245-D**
District **Clark, Nevada**

Administrator **OnlineParentingPrograms**
Certificate **OPP_40299184**
Delivery Type **Electronic**

IMPORTANT NOTIFICATION

This is your official Certificate of Completion. Submit this certificate to your attorney or the judge assigned to your case. Only official copies will be accepted.


Director of Education



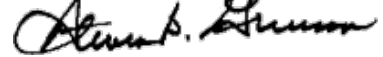
VERIFICATION URL

<https://www.onlineparentingprograms.com/view-certificate/5c50a9916b3b1.html>

FDF

Name: Louis C. Schneider, Esq.
Address: 430 So. 7th Street
Las Vegas Nevada 89101
Phone: 702-435-2121
Email: lcsllawllc@gmail.com
Attorney for Chalese Marie Solinger
Nevada State Bar No. 9683

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2/1/2019 9:51 AM
Steven D. Grierson
CLERK OF THE COURT



Eighth Judicial District Court

Clark County, Nevada

<u>ADAM M. SOLINGER</u> Plaintiff,	Case No. <u>D-19-582245-D</u>
vs. <u>CHALESE M. SOLINGER</u> Defendant.	Dept. <u>I</u>

GENERAL FINANCIAL DISCLOSURE FORM

A. Personal Information:

1. What is your full name? (first, middle, last) CHALESE MARIE SOLINGER
2. How old are you? 28
3. What is your date of birth? 11/17/1990
4. What is your highest level of education? _____

B. Employment Information:

1. Are you currently employed/ self-employed? (☒ check one)
☒ No
☐ Yes If yes, complete the table below. Attached an additional page if needed.

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)

2. Are you disabled? (☒ check one)
☒ No
☐ Yes If yes, what is your level of disability? _____
What agency certified you disabled? _____
What is the nature of your disability? _____

C. Prior Employment: If you are unemployed or have been working at your current job for less than 2 years, complete the following information.

Prior Employer: ARTIQUES Date of Hire: FALL 2013 Date of Termination: DEC 2014
Reason for Leaving: PREGNANCY COMPLICATIONS - BED REST

Monthly Personal Income Schedule

A. Year-to-date Income.

As of the pay period ending _____ my gross year to date pay is _____.

B. Determine your Gross Monthly Income.

Hourly Wage

	×		=	\$0.00	×	52	=	\$0.00	÷	12	=	\$0.00
Hourly Wage		Number of hours worked per week		Weekly Income		Weeks		Annual Income		Months		Gross Monthly Income

Annual Salary

	÷	12	=	\$0.00
Annual Income		Months		Gross Monthly Income

C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income			
Bonuses			
Car, Housing, or Other allowance:			
Commissions or Tips:			
Net Rental Income:			
Overtime Pay			
Pension/Retirement:			
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support			
Child Support			
Workman's Compensation			
Other:			
Total Average Other Income Received			\$0.00

Total Average Gross Monthly Income (add totals from B and C above)	\$0.00
--	--------

D. Monthly Deductions

	Type of Deduction	Amount
1.	Court Ordered Child Support (automatically deducted from paycheck)	
2.	Federal Health Savings Plan	
3.	Federal Income Tax	
4.	Health Insurance Amount for you: _____ For Opposing Party: _____ For your Child(ren): _____	0.00
5.	Life, Disability, or Other Insurance Premiums	
6.	Medicare	
7.	Retirement, Pension, IRA, or 401(k)	
8.	Savings	
9.	Social Security	
10.	Union Dues	
11.	Other: (Type of Deduction)	
Total Monthly Deductions (Lines 1-11)		0.00

Business/Self-Employment Income & Expense Schedule**A. Business Income:**

What is your average gross (pre-tax) monthly income/revenue from self-employment or businesses?
\$ _____

B. Business Expenses: Attach an additional page if needed.

Type of Business Expense	Frequency	Amount	12 Month Average
Advertising			
Car and truck used for business			
Commissions, wages or fees			
Business Entertainment/Travel			
Insurance			
Legal and professional			
Mortgage or Rent			
Pension and profit-sharing plans			
Repairs and maintenance			
Supplies			
Taxes and licenses (include est. tax payments)			
Utilities			
Other:			
Total Average Business Expenses			0.00

Personal Expense Schedule (Monthly)

A. Fill in the table with the amount of money **you** spend each month on the following expenses and check whether you pay the expense for you, for the other party, or for both of you.

Expense	Monthly Amount I Pay	For Me ☞	Other Party ☞	For Both ☞
Alimony/Spousal Support				
Auto Insurance				
Car Loan/Lease Payment				
Cell Phone				
Child Support (not deducted from pay)				
Clothing, Shoes, Etc...	100.00	✓		
Credit Card Payments (minimum due)	200.00	✓		
Dry Cleaning				
Electric				
Food (groceries & restaurants)	350.00	✓		
Fuel	150.00	✓		
Gas (for home)				
Health Insurance (not deducted from pay)				
HOA				
Home Insurance (if not included in mortgage)				
Home Phone				
Internet/Cable	145.00	✓		
Lawn Care				
Membership Fees				
Mortgage/Rent/Lease	660.00	✓		
Pest Control				
Pets	100.00	✓		
Pool Service				
Property Taxes (if not included in mortgage)				
Security				
Sewer				
Student Loans				
Unreimbursed Medical Expense				
Water	100.00	✓		
Other:				
Total Monthly Expenses	1,805.00			

Household Information

- A. Fill in the table below with the name and date of birth of each child, the person the child is living with, and whether the child is from this relationship. Attached a separate sheet if needed.

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 st	MICHAEL SOLINGER	06/16/15	MOM	YES	NO
2 nd	MARIE SOLINGER	08/28/17	MOM	YES	NO
3 rd					
4 th					

- B. Fill in the table below with the amount of money you spend each month on the following expenses for each child.

Type of Expense	1 st Child	2 nd Child	3 rd Child	4 th Child
Cellular Phone				
Child Care				
Clothing				
Education				
Entertainment				
Extracurricular & Sports				
Health Insurance (if not deducted from pay)				
Summer Camp/Programs				
Transportation Costs for Visitation				
Unreimbursed Medical Expenses				
Vehicle				
Other:				
Total Monthly Expenses	0.00	0.00	0.00	0.00

- C. Fill in the table below with the names, ages, and the amount of money contributed by all persons living in the home over the age of eighteen. If more than 4 adult household members attached a separate sheet.

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc...)	Monthly Contribution

Personal Asset and Debt Chart

A. Complete this chart by listing all of your assets, the value of each, the amount owed on each, and whose name the asset or debt is under. If more than 15 assets, attach a separate sheet.

Line	Description of Asset and Debt Thereon	Gross Value	Total Amount Owed	Net Value	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.		\$	- \$	= \$ 0.00	
2.		\$	- \$	= \$ 0.00	
3.		\$	- \$	= \$ 0.00	
4.		\$	- \$	= \$ 0.00	
5.		\$	- \$	= \$ 0.00	
6.		\$	- \$	= \$ 0.00	
7.		\$	- \$	= \$ 0.00	
8.		\$	- \$	= \$ 0.00	
9.		\$	- \$	= \$ 0.00	
10.		\$	- \$	= \$ 0.00	
11.		\$	- \$	= \$ 0.00	
12.		\$	- \$	= \$ 0.00	
13.		\$	- \$	= \$ 0.00	
14.		\$	- \$	= \$ 0.00	
15.		\$	- \$	= \$ 0.00	
Total Value of Assets (add lines 1-15)		\$ 0.00	- \$ 0.00	= \$ 0.00	

B. Complete this chart by listing all of your unsecured debt, the amount owed on each account, and whose name the debt is under. If more than 5 unsecured debts, attach a separate sheet.

Line #	Description of Credit Card or Other Unsecured Debt	Total Amount owed	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.		\$	
2.		\$	
3.		\$	
4.		\$	
5.		\$	
6.		\$	
Total Unsecured Debt (add lines 1-6)		\$ 0.00	

CERTIFICATION

Attorney Information: Complete the following sentences:

1. I (have/have not) _____ retained an attorney for this case.
2. As of the date of today, the attorney has been paid a total of \$_____ on my behalf.
3. I have a credit with my attorney in the amount of \$_____.
4. I currently owe my attorney a total of \$_____.
5. I owe my prior attorney a total of \$_____.

IMPORTANT: Read the following paragraphs carefully and initial each one.

CO I swear or affirm under penalty of perjury that I have read and followed all instructions in completing this Financial Disclosure Form. I understand that, by my signature, I guarantee the truthfulness of the information on this Form. I also understand that if I knowingly make false statements I may be subject to punishment, including contempt of court.

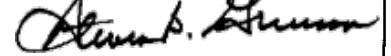
 I have attached a copy of my 3 most recent pay stubs to this form.

 I have attached a copy of my most recent YTD income statement/P&L statement to this form, if self-employed.

00 I have not attached a copy of my pay stubs to this form because I am currently unemployed.

Signature

Date 1/23/19



LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number: 009683
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-435-2121
Fax: 702-431-3807
jhhowardesq@hotmail.com
Attorney for the Defendant/Counterclaimant,
Adam M. Solinger

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

ADAM M. SOLINGER,

Plaintiff,

vs.

CHALESE M. SOLINGER,

Defendant.

Case Number:

D-19-582245-D

Department:

I

ADAM M. SOLINGER,

Counterclaimant,

vs.

CHALESE M. SOLINGER,

Counterdefendant.

ANSWER AND COUNTERCLAIM

COMES NOW, the Defendant/Counterclaimant, **CHALESE M. SOLINGER**, by and through her attorney, **LOUIS C. SCHNEIDER, ESQ.**, of the Law Offices of **LOUIS C. SCHNEIDER, LLC.**, and for answer to Plaintiff/Counterdefendant's Complaint for Custody on file herein, admits, denies and alleges as follows:

In answer to Paragraphs 1, 2, 3, 7, 10, 11, 12, 13 and 15 of Plaintiff/Counterdefendant's Complaint for Custody, Defendant/Counterclaimant admits the allegations contained therein.

In answer to Paragraph 4, 5, 8, 9, 11, 17 and 18 of Plaintiff/Counterdefendant's Complaint for Custody, Defendant/Counterclaimant denies each and every allegation contained therein.

1 In answer to Paragraph 6 of Plaintiff/Counterdefendant's Complaint for Custody,
2 Defendant/Counterclaimant admits that child support should be set in accordance with the Nevada
3 law based upon custody but denies that Plaintiff/Counterdefendant should be awarded primary
4 physical custody.

5 In answer to Paragraphs 14 of Plaintiff/Counterdefendant's Complaint for Custody,
6 Defendant/Counterclaimant is without sufficient knowledge to confirm or deny the allegations
7 contained therein.

8 **WHEREFORE**, prays that the Plaintiff/Counterdefendant take nothing by way of her
9 Complaint.

10 **COUNTERCLAIM**

11 1. That Defendant/Counterclaimant is, and for a period of more than six (6) weeks
12 immediately preceding the commencement of this Custody action has been, an actual bona fide
13 resident of the State of Nevada, and now resides and is domiciled therein, and during all of said
14 period of time, he has had, and continues to have the intent to make the State of Nevada his home,
15 residence and domicile for an indefinite period of time.

16 2. That Defendant/Counterclaimant and Plaintiff/Counterdefendant were married on or
17 about May 12, 2012 and ever since have lived as husband and wife.

18 3. That there is two (2) minor children born to the parties, to-wit: Michael Adam
19 Solinger, born June 16, 2015, and Marie Leona Solinger, born August 28, 2017. There are no minor
20 children adopted, and Plaintiff/Counterdefendant is not now pregnant to the best of
21 Defendant/Counterclaimant's knowledge.

22 4. That the minor children have continually resided in the State of Nevada since birth and
23 there are no custody proceedings pending in any other jurisdiction and the following mandatory
24 notices are applicable;

25 The Parties are on notice that they are subject to the requirements of NRS 125C.0045(6) and
26 NRS 125C.0045(7):

27 **PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT**
28 **OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS**

1 PUNISHABLE AS A CATEGORY D FELONY AS PROVIDED IN NRS 193.130.
2 NRS 200.359 provides that every person having a limited right of custody to a child
3 or any parent having no right of custody to the child who willfully detains, conceals,
4 or removes the child from a parent, guardian or other person having lawful custody
5 or a right of visitation of the child in violation of an order of this Court, or removes
6 the child from the jurisdiction of the Court without the consent of either the Court or
7 all persons who have the right to custody or visitation is subject to being punished for
8 a category D felony as provided in NRS 193.130.

9 NOTICE IS HEREBY GIVEN that the terms of the Hague Convention of October 25, 1980,
10 adopted by the 14th Session of the Hague Conference on Private International Law, apply if a parent
11 abducts or wrongfully retains a child in a foreign country. The minor child is a habitual resident of
12 Clark County, Nevada.

13 The parties are also placed on notice of the following provisions in NRS 125C.0045(8).

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

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

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

26 The parties are also placed on notice of the following provisions in NRS 125C.006

27 1. If primary physical custody has been established pursuant to an order, judgment or decree
28 of a court and the custodial parent intends to 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 impair the ability
of the other parent to maintain a meaningful relationship with the child, and the custodial parent

1 desires to take the child with him or her, the custodial parent shall, before relocating:

2 (a) Attempt to obtain the written consent of the noncustodial parent to relocate with the child; and

3 (b) If the noncustodial parent refuses to give that consent, petition the court for permission to
4 relocate with the child.

5 2. The court may award reasonable attorney's fees and costs to the custodial parent if the court
6 finds that the noncustodial parent refused to consent to the custodial parent's relocation with the child:

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

8 (b) For the purpose of harassing the custodial parent.

9 3. A parent who relocates with a child pursuant to this section without the written consent of
10 the noncustodial parent or the permission of the court is subject to the provisions of NRS 200.359.

11 The parties also placed on Notice of the following provisions in NRS 125C.0065:

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

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

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

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

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

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

26 3. A parent who relocates with a child pursuant to this section before the court enters an order
27 granting the parent primary physical custody of the child and permission to relocate with the child is
28

1 subject to the provisions of NRS 200.359.

2 The parties are also placed on notice of the following:

3 NRS 125.007 regarding the collection of child support payments through mandatory wage
4 withholding or assignment of income;

5 NRS 31A regarding the enforcement of a child support obligation and the collection of
6 delinquent child support;

7 NRS 125B.145 regarding the review of child support at any time due to changed
8 circumstances and at least every three years following the entry of the child support order.

9 6. That all NOTICE PROVISIONS contained in this Complaint should be made into
10 orders of the Court and the Court should retain jurisdiction to enforce the orders contained herein and
11 for all purposes relative to the custody and support of the minor child.

12 7. That due to Plaintiff/Counterdefendant refusal to cooperate with regards to medically
13 necessary procedure for the minor child Defendant/Counterclaimant and are each fit and proper
14 persons to share the joint legal custody of their minor child. Joint Legal Custody should be defined
15 as the following:

16 That each party should use all reasonable resources and efforts to promote a positive re-
17 lationship between the minor child and the other party.

18 That neither party should disparage or undermine the child's relationship with the other party.

19 That the parties should exert every reasonable effort to foster feelings of affection between
20 themselves and the child, recognizing that frequent and continuing association and communication
21 between both parties, with the child, is in the best interest and welfare of the minor child.

22 That the parties should consult and cooperate with each other in substantial questions relating
23 to the religious upbringing, educational needs, significant changes in social environment, and health
24 care of the minor child.

25 That the parties should have equal and full access to medical and school records pertaining
26 to the minor child and be permitted to independently consult with any and all professionals involved
27 with her.
28

1 That each party should be empowered to obtain emergency health care for the child without
2 the consent of the other party. Each party should notify the other party as soon as reasonably
3 practicable of any illness requiring medical attention or any emergency involving the child.

4 That each party should provide the other party with the address and telephone number at
5 which the minor child reside and to notify the other party prior to any change of address and provide
6 the telephone number as soon as it is assigned.

7 That each party should be entitled to reasonable telephone communication with the child.
8 Each party is restrained from unreasonably interfering with the child's right to privacy during such
9 telephone conversations. Telephone conversations should be initiated by either the child or parent,
10 and are to occur during reasonable hours.

11 8. That the parties should be awarded joint physical custody of the minor child. The
12 weekly custody and visitation schedule and the holiday and vacation schedule should be flexible to
13 accommodate the parties work and activity schedules and changes thereof. All birthdays, holidays
14 and special days should be fairly and equally divided.

15 9. That should the parties be unable agree to a custodial/visitation schedule they should
16 attend the Family Mediation Center as offered through the Eighth Judicial District Court, Family
17 Division.

18 10. That child support should be set in accordance with NRS 125B.070 and NRS
19 125B.080 and child support arrears should be retroactive to the date of separation, November 2018.

20 11. That Plaintiff should continue to provide and pay for medical, dental and optical health
21 insurance for the minor child through their place of employment if available and shall provide proof
22 of coverage and insurance cards to the other upon request.

23 12. That the parties should be equally responsible for all unreimbursed health care
24 expenses associated with the minor child, including any deductibles, as well as orthodontic, dental,
25 surgical and vision expenses pursuant to NRS § 125B.080(7) unless the Court specifically makes an
26 exception to that rule for extraordinary circumstances. All unreimbursed health care expenses should
27 be subject to the "30/30 Rule" which is defined as follows: A party incurring such an out-of-pocket
28

1 expense shall, within thirty days thereafter, provide to the other party documentation as to such
2 expense and a request for one-half payment. Within thirty days of receipt of said documentation of
3 an unreimbursed health care expense, the other party shall reimburse one-half said expense. A party
4 incurring a health care expense loses the right to request one-half payment by the non-incurring parent
5 when they do not timely provide the other parent with proof of the expense and a request for one-half
6 payment. Should a party be provided a timely request and proof of an unreimbursed health care
7 expense, and then neglect to timely pay their one-half share, then the entirety of the cost shall be
8 borne by the parent untimely paying the expense.

9 13. That there is community property of the parties hereto to be fairly and equitably
10 divided between the parties.

11 14. That there are community debts of the parties which should be fairly and equitably
12 divided between the parties.

13 15. That Defendant/Counterclaimant be awarded alimony and/or spousal support.

14 16. That Defendant/Counterclaimant should be awarded preliminary attorney's fees in the
15 amount of five thousand dollars (\$5,000.00).

16 17. That Defendant/Counterclaimant shall be permitted to return to the use of her former
17 name to wit: Anderson or maintain her present name, at her sole discretion.

18 18. That for the tax year 2018 the parties should file married filing jointly. From 2019 and
19 each and every year thereafter the parties should file separate taxes with Defendant/ Counterclaimant
20 to claim the two minor children as and for dependent deductions.

21 19. That the parties are incompatible in their tastes, natures, views, likes and dislikes,
22 which have become widely separate and divergent so that the parties hereto have been and now are
23 incompatible to such an extent that it now appears that there is no possibility of reconciliation
24 between the parties, and there remains such an incompatible temperament between the parties that
25 a happy marital status can no longer exist.

26 **WHEREFORE**, the Defendant/Counterclaimant prays judgment as follows:

27 1. That the parties should share joint physical custody and joint legal custody of the
28

1 minor child;

2 2. That should the parties be unable agree to a custodial/visitation schedule they will
3 attend the Family Mediation Center as offered through the Eighth Judicial District Court, Family
4 Division;

5 3. That child support be set accordance with NRS 125B.070 and NRS 125B.080 and
6 arrears retroactive to the date of separation;

7 4. That Plaintiff/Counterdefendant to provide medical, dental and optical health insurance
8 through their place of employment;

9 5. Defendant/Counterclaimant and Plaintiff/Counterdefendant should be equally
10 responsible for all unreimbursed health care expenses associated with the minor child, pursuant to the
11 "30/30 Rule";

12 6. That the community property be fairly and equitably divided between the parties;

13 14. That the community debts be fairly and equitably divided between the parties;

14 15. That Defendant/Counterclaimant be awarded alimony and/or spousal support;

15 16. That Defendant/Counterclaimant be awarded preliminary attorney's fees in the amount
16 of five thousand dollars (\$5,000.00);

17 17. That Defendant/Counterclaimant be permitted to return to the use of her former name
18 to wit: Anderson or maintain her present name, at her sole discretion;

19 18. That for the tax year 2018 the parties should file married filing jointly. From 2019
20 forward the parties file separate taxes with Defendant/ Counterclaimant to claim the two minor
21 children as and for dependent deductions;

22 9. For such other and further relief as the Court may deem just and proper in the
23 premises.

24
25 **DATED** this _____ day of January, 2019.

26
27 
28 **LOUIS C. SCHNEIDER, ESQ.**
Nevada Bar Number: 009683

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VERIFICATION

STATE OF NEVADA)
) SS:
COUNTY OF CLARK)


CHALESE M. SOLINGER, being first duly sworn, deposes and says:

That she is the Defendant/Counterclaimant herein; that she has read the foregoing Answer and Counterclaim, and the same is true of her own knowledge, except for those matters which are therein stated upon information and belief, and as to those matters, she believes them to be true.

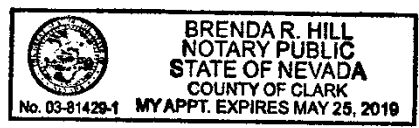


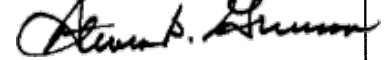
CHALESE M. SOLINGER

SUBSCRIBED and SWORN TO before me
this 31st day of January, 2019.



NOTARY PUBLIC in and for
said County and State





LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number: 009683
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-435-2121
Fax: 702-431-3807
jhhowardesq@hotmail.com
Attorney for the Defendant/Counterclaimant,
Chalese Solinger

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

ADAM M. SOLINGER,

Plaintiff/Counterdefendant,

vs.

CHALESE M. SOLINGER,

Defendant/Counterclaimant.

Case Number: D-19-582245-D
Department: I

Date of Hearing: February 11, 2019
Time of Hearing: 8:45 a.m.

EX PARTE MOTION TO VACATE OR CONTINUE HEARING

Upon the Affidavits of **LOUIS C. SCHNEIDER, ESQ.**, it is hereby requested that Defendant's EX PARTE MOTION TO VACATE OR CONTINUE HEARING be granted.

This Motion is made and based upon the pleadings and papers on file herein, the affidavit of counsel LOUIS C. SCHNEIDER, filed herewith, and any argument presented at the time of hearing in this matter.

Dated this 5 day of February, 2019.



LOUIS C. SCHNEIDER, ESQ.

Nevada Bar Number 009683
430 South 7th Street
Las Vegas, Nevada 89101
702-435-2121
Attorney for Defendant


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STATEMENT OF FACTS

On or about February 4, 2019, Counsel for the Defendant, was informed of a scheduling conflict regarding an uncontested hearing which is currently set for February 11, 2019. Counsel for Defendant has an ongoing harassment case with a former assistant and is subpoenaed to appear for Trial on Monday, February 11, 2019 at 8:00 a.m. regarding an ongoing harassment case wherein he is the victim. Counsel is *required* to appear and cooperate with the Subpoena issued by the Henderson City Attorney office and testify at Trial. Unfortunately it is in conflict with this matter before the Court. Counsel did contact the Plaintiff regarding a possible settlement without Court involvement but Plaintiff did not answer or response thus delaying Defendant's Answer. This matter has been set for an uncontested hearing and Defendant's counsel is in the process of filing a Motion to Set Aside Default. This Court must hear this matter based upon its merits and not due to a technicality as it is clearly not in the best interests of the minor children.

Counsel hereby requests that the Court vacate or continue the uncontested hearing to a future date, so that counsel and Defendant may attend and contest the Complaint filed herein.

DATED this 1 day of February, 2019.


LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number 009683
430 South 7th Street
Las Vegas, Nevada 89101
702-435-2121
Attorney for Defendant

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AFFIDAVIT OF COUNSEL IN SUPPORT OF MOTION

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, **LOUIS C SCHNEIDER, ESQ.**, being first duly sworn according to law, upon oath,
deposes and says:

1. That I am an Attorney at Law duly licensed to practice in all courts in the State of Nevada;
2. That I am the Attorney of record for the Defendant herein;
3. That I am subpoenaed to appear in the Henderson Municipal Court on February 11, 2019 regarding Trial on personal harassment case, please see attached the Subpoena as EXHIBIT A;
4. That I attempted to contact Mr. Solinger to discuss this matter several times prior to filing my client's Answer trying to settle this matter without Court hearings but he refused to discuss settlement;
5. That Mr. Solinger cannot act as his own Resident Witness and therefore based upon that and other issues stated herein, the uncontested hearing must be vacated;
6. That I personally handle this case and do to my lack of availability, I formally request that if not vacated, the matter be continued and set for a Case Management Conference.
7. FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 5th day of February, 2019.


LOUIS C. SCHNEIDER

SUBSCRIBED and **SWORN** to me
this 5th day of February, 2019.


NOTARY PUBLIC in and for said
County and State

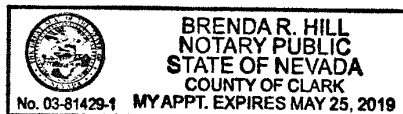


EXHIBIT A

MUNICIPAL COURT OF THE CITY OF HENDERSON
IN THE COUNTY OF CLARK, STATE OF NEVADA

CITY OF HENDERSON, NEVADA

vs.

Roxanne Marie Thompson

Plaintiff,

Defendant,

) Charges: HARASSMENT - FIRST OFFENSE

) Case #: 18CR011623

) Violation Date: 07/23/2018

) Involvement: Victim

) DEPARTMENT D1

SUBPOENA

The City of Henderson sends greetings to:

LOUIS CRAIG SCHNEIDER
808 San Gabriel Avenue
Henderson, NV 89002

ATTENTION!

PLEASE CALL 702-267-1370 AFTER 5:30P.M. THE NIGHT BEFORE THE TRIAL AND PRESS OPTION 1. YOU MUST APPEAR TO TESTIFY IF THE NAME OF THE DEFENDANT IS LISTED ON THE RECORDING.

YOU ARE HEREBY COMMANDED: that all singular, business and excuses being set aside, you appear at the Office of the Henderson City Attorney-Criminal Division, 243 Water Street, Henderson, Nevada 89015 on

Monday, February 11, 2019 at 08:00 AM for Pre-Trial Examination – 1st Floor

(Trial will be held at 10:00 AM in Henderson Municipal Court Department 1 – 3rd Floor)

Upon reporting as ordered herein witnesses shall receive a statutorily authorized witness fee payment of \$25.00.
PROPER ATTIRE REQUIRED: NO SHORTS, HALTER TOPS, OR TANK TOPS WILL BE ALLOWED IN COURT.

January 17, 2019

DATE

IT IS A CRIME TO (OR ATTEMPT TO) WILLFULLY RESIST THE COURT'S LAWFUL SUBPOENA PROCESS OR TO INTERFERE WITH, DELAY, HINDER, OBSTRUCT, OR RESIST A PUBLIC OFFICER IN THE PERFORMANCE OF THEIR LAWFUL DUTIES. WILLFUL & UN-EXCUSED FAILURE TO APPEAR AFTER LAWFUL DELIVERY & ACCEPTANCE OF THIS SUBPOENA IS A MISDEMEANOR. A WARRANT OF ARREST MAY BE ISSUED.

STATE OF NEVADA)

COUNTY OF CLARK)

ss.

-----Certificate of Service-----

_____, being at all times herein, a person 18 years or older, and not a party to this action, or being a Peace

Officer, states that I received this subpoena on _____, ☐ served same on _____,
on _____, by: ☐ Personal Service ☐ Promise to Appear* ☐ Attempts at Service were unsuccessful due to the

following: _____ ☐ Unable to contact – Mailed to the last known address

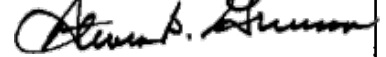
*Pursuant to NRS 174.315(3), I certify that on _____ at _____ hrs I contacted the above witness who identified him/herself as the witness named on the subpoena by means of _____; I identified myself by name, and occupation, and informed them of the contents of subpoena. The witness did promise to appear at the date and time on subpoena. I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____, by _____

Please return served Subpoena to Lindsay Johnson
PCN No.:

DR No.: 18-16256
PBK No.: 016986

000039



LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number: 009683
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-435-2121
Fax: 702-431-3807
jhhowardesq@hotmail.com
Attorney for the Defendant/Counterclaimant,
Chalese Solinger

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

ADAM M. SOLINGER,

Plaintiff,

vs.

CHALESE M. SOLINGER,

Defendant.

Case Number: D-19-582245-D
Department: I

ADAM M. SOLINGER,

Counterclaimant,

vs.

CHALESE M. SOLINGER,

Counterdefendant.

AMENDED ANSWER AND COUNTERCLAIM

COMES NOW, the Defendant/Counterclaimant, **CHALESE M. SOLINGER**, by and through her attorney, **LOUIS C. SCHNEIDER, ESQ.**, of the Law Offices of **LOUIS C. SCHNEIDER, LLC.**, and files her amended answer to Plaintiff/Counterdefendant's Complaint for Custody on file herein, admits, denies and alleges as follows:

In answer to Paragraphs 1, 2, 3, 7, 10, 11, 12, 13 and 15 of Plaintiff/Counterdefendant's Complaint for Custody, Defendant/Counterclaimant admits the allegations contained therein.

In answer to Paragraph 4, 5, 8, 9, 11, 17 and 18 of Plaintiff/Counterdefendant's Complaint for Custody, Defendant/Counterclaimant denies each and every allegation contained therein.

1 In answer to Paragraph 6 of Plaintiff/Counterdefendant's Complaint for Custody,
2 Defendant/Counterclaimant admits that child support should be set in accordance with the Nevada
3 law based upon custody but denies that Plaintiff/Counterdefendant should be awarded primary
4 physical custody.

5 In answer to Paragraphs 14 of Plaintiff/Counterdefendant's Complaint for Custody,
6 Defendant/Counterclaimant is without sufficient knowledge to confirm or deny the allegations
7 contained therein.

8 **WHEREFORE**, prays that the Plaintiff/Counterdefendant take nothing by way of her
9 Complaint.

10 **COUNTERCLAIM**

11 1. That Defendant/Counterclaimant is, and for a period of more than six (6) weeks
12 immediately preceding the commencement of this Custody action has been, an actual bona fide
13 resident of the State of Nevada, and now resides and is domiciled therein, and during all of said
14 period of time, he has had, and continues to have the intent to make the State of Nevada his home,
15 residence and domicile for an indefinite period of time.

16 2. That Defendant/Counterclaimant and Plaintiff/Counterdefendant were married on or
17 about May 12, 2012 and ever since have lived as husband and wife.

18 3. That there is two (2) minor children born to the parties, to-wit: Michael Adam
19 Solinger, born June 16, 2015, and Marie Leona Solinger, born August 28, 2017. There are no minor
20 children adopted, and Plaintiff/Counterdefendant is not now pregnant to the best of
21 Defendant/Counterclaimant's knowledge.

22 4. That the minor children have continually resided in the State of Nevada since birth and
23 there are no custody proceedings pending in any other jurisdiction and the following mandatory
24 notices are applicable;

25 The Parties are on notice that they are subject to the requirements of NRS 125C.0045(6) and
26 NRS 125C.0045(7):

27 PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT
28 OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS

1 PUNISHABLE AS A CATEGORY D FELONY AS PROVIDED IN NRS 193.130.
2 NRS 200.359 provides that every person having a limited right of custody to a child
3 or any parent having no right of custody to the child who willfully detains, conceals,
4 or removes the child from a parent, guardian or other person having lawful custody
5 or a right of visitation of the child in violation of an order of this Court, or removes
6 the child from the jurisdiction of the Court without the consent of either the Court or
7 all persons who have the right to custody or visitation is subject to being punished for
8 a category D felony as provided in NRS 193.130.

9 NOTICE IS HEREBY GIVEN that the terms of the Hague Convention of October 25, 1980,
10 adopted by the 14th Session of the Hague Conference on Private International Law, apply if a parent
11 abducts or wrongfully retains a child in a foreign country. The minor child is a habitual resident of
12 Clark County, Nevada.

13 The parties are also placed on notice of the following provisions in NRS 125C.0045(8).

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

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

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

26 The parties are also placed on notice of the following provisions in NRS 125C.006

27 1. If primary physical custody has been established pursuant to an order, judgment or decree
28 of a court and the custodial parent intends to 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 impair the ability
of the other parent to maintain a meaningful relationship with the child, and the custodial parent

1 desires to take the child with him or her, the custodial parent shall, before relocating:

2 (a) Attempt to obtain the written consent of the noncustodial parent to relocate with the child; and

3 (b) If the noncustodial parent refuses to give that consent, petition the court for permission to
4 relocate with the child.

5 2. The court may award reasonable attorney's fees and costs to the custodial parent if the court
6 finds that the noncustodial parent refused to consent to the custodial parent's relocation with the child:

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

8 (b) For the purpose of harassing the custodial parent.

9 3. A parent who relocates with a child pursuant to this section without the written consent of
10 the noncustodial parent or the permission of the court is subject to the provisions of NRS 200.359.

11 The parties also placed on Notice of the following provisions in NRS 125C.0065:

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

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

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

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

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

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

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

28 The parties are also placed on notice of the following:

1 NRS 125.007 regarding the collection of child support payments through mandatory wage
2 withholding or assignment of income;

3 NRS 31A regarding the enforcement of a child support obligation and the collection of
4 delinquent child support;

5 NRS 125B.145 regarding the review of child support at any time due to changed
6 circumstances and at least every three years following the entry of the child support order.

7 6. That all NOTICE PROVISIONS contained in this Complaint should be made into
8 orders of the Court and the Court should retain jurisdiction to enforce the orders contained herein and
9 for all purposes relative to the custody and support of the minor child.

10 7. That due to Plaintiff/Counterdefendant abandoning the home and his refusal to
11 cooperate with regards to medically necessary procedure for the minor child, Michael Solinger,
12 Defendant/Counterclaimant should be awarded primary legal custody and primary physical custody
13 of the parties minor children.

14 8. That the parties should attend the Family Mediation Center as offered through the
15 Eighth Judicial District Court, Family Division.

16 9. That child support should be set in accordance with NRS 125B.070 and NRS
17 125B.080 and child support arrears should be retroactive to the date of separation, November 2018.

18 10. That Plaintiff/Counterdefendant should continue to provide and pay for medical, dental
19 and optical health insurance for the minor child through their place of employment if available and
20 shall provide proof of coverage and insurance cards to the other upon request.

21 11. That the parties should be equally responsible for all unreimbursed health care
22 expenses associated with the minor child, including any deductibles, as well as orthodontic, dental,
23 surgical and vision expenses pursuant to NRS § 125B.080(7) unless the Court specifically makes an
24 exception to that rule for extraordinary circumstances. All unreimbursed health care expenses should
25 be subject to the "30/30 Rule" which is defined as follows: A party incurring such an out-of-pocket
26 expense shall, within thirty days thereafter, provide to the other party documentation as to such
27 expense and a request for one-half payment. Within thirty days of receipt of said documentation of
28 an unreimbursed health care expense, the other party shall reimburse one-half said expense. A party

1 incurring a health care expense loses the right to request one-half payment by the non-incurring parent
2 when they do not timely provide the other parent with proof of the expense and a request for one-half
3 payment. Should a party be provided a timely request and proof of an unreimbursed health care
4 expense, and then neglect to timely pay their one-half share, then the entirety of the cost shall be
5 borne by the parent untimely paying the expense.

6 12. That there is community property of the parties hereto to be fairly and equitably
7 divided between the parties.

8 13. That there are community debts of the parties which should be fairly and equitably
9 divided between the parties.

10 14. That Defendant/Counterclaimant be awarded rehabilitative spousal support and/or
11 alimony.

12 15. That Defendant/Counterclaimant should be awarded preliminary attorney's fees in the
13 amount of five thousand dollars (\$5,000.00).

14 16. That Defendant/Counterclaimant shall be permitted to return to the use of her former
15 name to wit: Anderson or maintain her present name, at her sole discretion.

16 17. That for the tax year 2018 the parties should file married filing jointly. From 2019 and
17 each and every year thereafter the parties should file separate taxes with Defendant/ Counterclaimant
18 to claim the two minor children as and for dependent deductions.

19 18. That the parties are incompatible in their tastes, natures, views, likes and dislikes,
20 which have become widely separate and divergent so that the parties hereto have been and now are
21 incompatible to such an extent that it now appears that there is no possibility of reconciliation
22 between the parties, and there remains such an incompatible temperament between the parties that
23 a happy marital status can no longer exist.

24 **WHEREFORE**, the Defendant/Counterclaimant prays judgment as follows:

25 1. That the Defendant/Counterclaimant be awarded physical custody and primary legal
26 custody of the minor children;

27 2. That should the parties be unable agree to a custodial/visitation schedule they will
28 attend the Family Mediation Center as offered through the Eighth Judicial District Court, Family

1 Division;

2 3. That child support be set accordance with NRS 125B.070 and NRS 125B.080 and
3 arrears retroactive to the date of separation;

4 4. That Plaintiff/Counterdefendant to provide medical, dental and optical health insurance
5 through their place of employment;

6 5. Defendant/Counterclaimant and Plaintiff/Counterdefendant should be equally
7 responsible for all unreimbursed health care expenses associated with the minor child, pursuant to the
8 "30/30 Rule";

9 6. That the community property be fairly and equitably divided between the parties;

10 14. That the community debts be fairly and equitably divided between the parties;

11 15. That Defendant/Counterclaimant be awarded rehabilitative spousal support and/or
12 alimony;

13 16. That Defendant/Counterclaimant be awarded preliminary attorney's fees in the amount
14 of five thousand dollars (\$5,000.00);

15 17. That Defendant/Counterclaimant be permitted to return to the use of her former name
16 to wit: Anderson or maintain her present name, at her sole discretion;

17 18. That for the tax year 2018 the parties should file married filing jointly. From 2019
18 forward the parties file separate taxes with Defendant/ Counterclaimant to claim the two minor
19 children as and for dependent deductions;

20 9. For such other and further relief as the Court may deem just and proper in the
21 premises.

22 DATED this 7 day of February, 2019.

23
24 
25 **LOUIS C. SCHNEIDER, ESQ.**
26 Nevada Bar Number: 009683
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VERIFICATION

STATE OF NEVADA)
) SS:
COUNTY OF CLARK)


CHALESE M. SOLINGER, being first duly sworn, deposes and says:

That she is the Defendant/Counterclaimant herein; that she has read the foregoing Answer and Counterclaim, and the same is true of her own knowledge, except for those matters which are therein stated upon information and belief, and as to those matters, she believes them to be true.

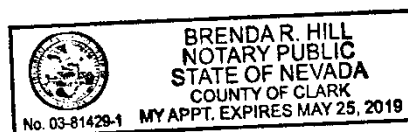


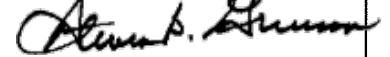
CHALESE M. SOLINGER

SUBSCRIBED and SWORN TO before me
this 7th day of February, 2019.



NOTARY PUBLIC in and for
said County and State





1 **LOUIS C. SCHNEIDER, ESQ.**
2 Nevada Bar Number: 009683
3 430 South 7th Street
4 Las Vegas, Nevada 89101
5 Ph: 702-435-2121
6 Fax: 702-431-3807
7 jhhowardeseq@hotmail.com
8 Attorney for the Defendant/Counterclaimant,
9 Chalese Solinger

6 **EIGHTH JUDICIAL DISTRICT COURT**

7 **FAMILY DIVISION**

8 **CLARK COUNTY, NEVADA**

9 **ADAM M. SOLINGER,**

10 Plaintiff/Counterdefendant,

11 vs.

12 **CHALESE M. SOLINGER,**

13 Defendant/Counterclaimant.

Case Number: D-19-582245-D
Department: I

Date of Hearing: 27th March 2019
Time of Hearing: No Appearance Required

14
15 **NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE**
16 **CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE**
17 **WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN**
18 **RESPONSE WITH THE CLERK OF THE COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS**
19 **MOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT**
20 **HEARING PRIOR TO THE SCHEDULED HEARING DATE.**

21 **MOTION TO SET ASIDE DEFAULT; FOR EXCLUSIVE POSSESSION OF THE MARITAL**
22 **RESIDENCE AND ORDERING PLAINTIFF TO ASSIST IN MAKING MORTGAGE**
23 **PAYMENTS; FOR MEDICAL LEGAL CUSTODY OF THE MINOR CHILDREN, FOR AN**
24 **ORDER REFERRING THE PARTIES TO MEDIATION PURSUANT TO EDCR 5.70, FOR**
25 **AN ORDER AWARDING PLAINTIFF CHILD SUPPORT; FOR AN ORDER AWARDING**
26 **PLAINTIFF ALIMONY; AND FOR ATTORNEY FEES AND COSTS**

27 COMES NOW Defendant, CHALESE M. SOLINGER, by and through her attorney, LOUIS
28 C. SCHNEIDER, ESQ., and moves this Honorable Court for its Order granting the her the following
relief:

- 25 1. An Order setting aside the Default filed by Plaintiff for failure to file a Three Day
26 Notice of Intent to Take Default;
- 27 2. An Order granting Defendant exclusive possession of the marital residence and
28 ordering Plaintiff to assist in making mortgage payments thereon;

LOUIS C. SCHNEIDER, LLC.
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-430-2121

1 3. An Order awarding the Defendant primary legal custody for medical purposes of the
2 two minor children;

3 4. An Order awarding Defendant child support retroactive to the date of separation
4 November 2018;

5 5. An Order referring the parties to mediation pursuant to EDCR 5.70;

6 6. An Order awarding Defendant temporary alimony in the amount of \$800.00 retroactive
7 to the date of separation November 2018;

8 7. A preliminary award of attorneys fees and costs to Defendant; and

9 8. Such other and further orders as this Court deems fair and equitable.

10 This Motion is made and based upon the files, the papers and pleadings in this action, the
11 Points and Authorities attached hereto, the Affidavit attached hereto, and any argument of counsel
12 and evidence that may be adduced at the time of Hearing on the within Motion.

13 Dated this 7 day of February, 2019.

14
15 
16 **LOUIS C. SCHNEIDER, ESQ.**
Nevada Bar Number: 009683

17 **NOTICE OF HEARING**

18 **TO: ADAM SOLINGER**, the Defendant; and

19 **TO: HIS ATTORNEY**, if any:

20 **YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE** that the undersigned will
21 bring the above and foregoing **Motion** on for hearing on the 27th day of March,
22 **No Appearance Required**
2019, at the hour of _____ o'clock _____m., in Department I of the above entitled Court, or
23 as soon thereafter as counsel can be heard.

24 Dated this 7 day of February, 2019.

25
26 
27 **LOUIS C. SCHNEIDER, ESQ.**
Nevada Bar Number: 009683
28

I.

STATEMENT OF FACTS

The Plaintiff, ADAM SOLINGER, and Defendant, CHALESE SOLINGER, were married on May 12, 2012 in Clark County, Nevada. They have two (2) minor children born the issue of this marriage, to wit: to-wit: Michael Adam Solinger, born June 16, 2015, and Marie Leona Solinger, born August 28, 2017.

Prior to their marriage, the parties dated since 2008 and moved to Las Vegas, Nevada in 2011. Shortly after marriage, Plaintiff began attending law school in the fall while Defendant worked at the Artiques home furniture store when Defendant became pregnant with their first child, Michael. Defendant was put on bed rest during her pregnancy and was force to give notice and stop working. Once Plaintiff graduated and passed the Nevada Bar Exam he began working for Las Vegas Defense Group. In 2016, Defendant briefly went back to work at the Artiques store when she became pregnant with their daughter Marie. Unfortunately Defendant was again put on bed rest until Marie was born in August, 2017.

It became apparent to Defendant that Plaintiff was more focused on his career then family life. In June of 2018, Plaintiff abandoned Defendant and the children and was missing for a least three days. When Plaintiff returned he stated that he wanted a divorce. The parties attempted to work on their marriage but Plaintiff contributed little to no effort. They attended one counseling session and in October 2018, Plaintiff decided he was completely finished with the Defendant. Again Plaintiff left his family, leaving Defendant solely and fully responsible for the minor children and the household.

II.

POINTS AND AUTHORITIES

DEFENDANT SHOULD BE AWARDED PRIMARY PHYSICAL AND LEGAL CUSTODY OF THE PARTIES' TWO (2) MINOR CHILDREN

As Defendant has been the primary caregiver of the parties' two children, and the parties' son, Michael is in need of corrective surgery. Historically Plaintiff has not been fully involved in the children's daily routine and has left it to the Defendant to fulfill both parental rolls. Plaintiff has

1 threatened Defendant with contacting CPS or that he will be picking up the children from school and
2 not returning them to her for reasons unbeknownst to Defendant. She should be awarded primary
3 physical and primary legal custody of the children to ensure the children are properly cared especially
4 for medically purposes since Plaintiff is completely unreliable. While in NRS 125C.0015 its state
5 that "Parents have joint custody until otherwise ordered by court" it is NRS 125C.035 that provides
6 for the best interest of children and states...

7 Best interests of child: Joint physical custody; preferences; presumptions when court
8 determines parent or person seeking custody is perpetrator of domestic violence or has committed act
9 of abduction against child or any other child.

10 1. In any action for determining physical custody of a minor child, the sole
11 consideration of the court is the best interest of the child. If it appears to the court that
12 joint physical custody would be in the best interest of the child, the court may grant
13 physical custody to the parties jointly.

14 2. Preference must not be given to either parent for the sole reason that the parent
15 is the mother or the father of the child.

16 3. The court shall award physical custody in the following order of preference
17 unless in a particular case the best interest of the child requires otherwise:

18 (a) To both parents jointly pursuant to NRS 125C.0025 or to either parent pursuant
19 to NRS 125C.003. If the court does not enter an order awarding joint physical
20 custody of a child after either parent has applied for joint physical custody, the court
21 shall state in its decision the reason for its denial of the parent's application.

22 (b) To a person or persons in whose home the child has been living and where the
23 child has had a wholesome and stable environment.

24 (c) To any person related within the fifth degree of consanguinity to the child whom
25 the court finds suitable and able to provide proper care and guidance for the child,
26 regardless of whether the relative resides within this State.

27 (d) To any other person or persons whom the court finds suitable and able to
28 provide proper care and guidance for the child.

4. In determining the best interest of the child, the court shall consider and set
forth its specific findings concerning, among other things:

(a) The wishes of the child if the child is of sufficient age and capacity to form an
intelligent preference as to his or her physical custody.

(b) Any nomination of a guardian for the child by a parent.

(c) Which parent is more likely to allow the child to have frequent associations
and a continuing relationship with the noncustodial parent.

(d) The level of conflict between the parents.

(e) The ability of the parents to cooperate to meet the needs of the child.

(f) The mental and physical health of the parents.

(g) The physical, developmental and emotional needs of the child.

(h) The nature of the relationship of the child with each parent.

(i) The ability of the child to maintain a relationship with any sibling.

(j) Any history of parental abuse or neglect of the child or a sibling of the child.
(k) Whether either parent or any other person seeking physical custody has
engaged in an act of domestic violence against the child, a parent of the child or any
other person residing with the child.

(l) Whether either parent or any other person seeking physical custody has
committed any act of abduction against the child or any other child.

1 5. Except as otherwise provided in subsection 6 or NRS 125C.210, a
2 determination by the court after an evidentiary hearing and finding by clear and
3 convincing evidence that either parent or any other person seeking physical custody
4 has engaged in one or more acts of domestic violence against the child, a parent of
5 the child or any other person residing with the child creates a rebuttable presumption
6 that sole or joint physical custody of the child by the perpetrator of the domestic
7 violence is not in the best interest of the child. Upon making such a determination,
8 the court shall set forth:

9 (a) Findings of fact that support the determination that one or more acts of
10 domestic violence occurred; and

11 (b) Findings that the custody or visitation arrangement ordered by the court
12 adequately protects the child and the parent or other victim of domestic violence who
13 resided with the child.

14 6. If after an evidentiary hearing held pursuant to subsection 5 the court
15 determines that each party has engaged in acts of domestic violence, it shall, if
16 possible, then determine which person was the primary physical aggressor. In
17 determining which party was the primary physical aggressor for the purposes of this
18 section, the court shall consider:

19 (a) All prior acts of domestic violence involving either party;

20 (b) The relative severity of the injuries, if any, inflicted upon the persons involved
21 in those prior acts of domestic violence;

22 (c) The likelihood of future injury;

23 (d) Whether, during the prior acts, one of the parties acted in self-defense; and

24 (e) Any other factors which the court deems relevant to the determination.

25 Ê In such a case, if it is not possible for the court to determine which party is the
26 primary physical aggressor, the presumption created pursuant to subsection 5 applies
27 to both parties. If it is possible for the court to determine which party is the primary
28 physical aggressor, the presumption created pursuant to subsection 5 applies only to
the party determined by the court to be the primary physical aggressor.

1 7. A determination by the court after an evidentiary hearing and finding by clear
2 and convincing evidence that either parent or any other person seeking physical
3 custody has committed any act of abduction against the child or any other child
4 creates a rebuttable presumption that sole or joint physical custody or unsupervised
5 visitation of the child by the perpetrator of the abduction is not in the best interest of
6 the child. If the parent or other person seeking physical custody does not rebut the
7 presumption, the court shall not enter an order for sole or joint physical custody or
8 unsupervised visitation of the child by the perpetrator and the court shall set forth:

9 (a) Findings of fact that support the determination that one or more acts of
10 abduction occurred; and

11 (b) Findings that the custody or visitation arrangement ordered by the court
12 adequately protects the child and the parent or other person from whom the child was
13 abducted.

14 8. For the purposes of subsection 7, any of the following acts constitute
15 conclusive evidence that an act of abduction occurred:

16 (a) A conviction of the defendant of any violation of NRS 200.310 to 200.340,
17 inclusive, or 200.359 or a law of any other jurisdiction that prohibits the same or
18 similar conduct;

19 (b) A plea of guilty or nolo contendere by the defendant to any violation of NRS
20 200.310 to 200.340, inclusive, or 200.359 or a law of any other jurisdiction that
21 prohibits the same or similar conduct; or

22 (c) An admission by the defendant to the court of the facts contained in the
23 charging document alleging a violation of NRS 200.310 to 200.340, inclusive, or
24 200.359 or a law of any other jurisdiction that prohibits the same or similar conduct.

25 9. If, after a court enters a final order concerning physical custody of the child,
26 a magistrate determines there is probable cause to believe that an act of abduction has
27 been committed against the child or any other child and that a person who has been
28

1 awarded sole or joint physical custody or unsupervised visitation of the child has
2 committed the act, the court shall, upon a motion to modify the order concerning
physical custody, reconsider the previous order concerning physical custody pursuant
to subsections 7 and 8.

3 10. As used in this section:

4 (a) "Abduction" means the commission of an act described in NRS 200.310 to
200.340, inclusive, or 200.359 or a law of any other jurisdiction that prohibits the
same or similar conduct.

5 (b) "Domestic violence" means the commission of any act described in NRS
33.018..

6
7 In this case, best interests of the minor children would not only include awarding primary
8 physical custody but also awarding primary legal custody as well. The medical needs of the minor
9 children are a crucial and when a parent willfully stalls or blocks the other parent from gaining
10 necessary medical attention, then the Court has discretion to award primary legal custody. While
11 Defendant should be awarded primary legal custody and primary physical custody she would like
12 Plaintiff to be informed as to the status of any medical needs and will encourage liberal and frequent
13 contact and communication so long as it is without conflict.

14 **DEFENDANT SHOULD BE AWARDED CHILD SUPPORT**

15 Plaintiff should be ordered to pay child support to Defendant consistent with NRS 125B.070
16 and NRS 125B.080. Plaintiff's gross monthly income is unknown at this time as he has not filed his
17 required Financial Disclosure Form assuming he was able to obtain a divorce through a Default and
18 proceed without Defendant. The amount of child support should be retroactive to the official date
19 of separating in this case which is November 2018, and thereafter be payable on the first day of each
20 month until further order of this Court.

21 **DEFENDANT SHOULD BE AWARDED SPOUSAL SUPPORT**

22 Plaintiff was able to attend Law School while Defendant fully supported him by taking care
23 of their minor children and maintaining the household even when Plaintiff abandoned them in June
24 2018 with only a brief return until finally leaving Defendant fully responsible. Plaintiff is able-bodied
25 and capable of paying Defendant the amount of \$800.00 per month as and for temporary spousal
26 support pending Trial.

27 **DEFENDANT SHOULD BE AWARDED EXCLUSIVE POSSESSION OF THE**
28 **MARITAL RESIDENCE**

Defendant wishes to protect her children from any further upsets in their lives regarding the

1 parties' anticipated divorce. Defendant should be awarded exclusive possession of the marital
2 residence during the pendency of the action since Plaintiff chose to leave. This would provide for
3 stability and be less disruptive to the children during this transitional time for them. The children will
4 adjust to the transition easier if Plaintiff is not allowed to come and go as he pleases without
5 Defendant's knowledge. Defendant understands that it is more expensive to support two households
6 and therefore offers to have Plaintiff pay half the rent on the marital residence and utilities during the
7 pendency of the action.

8 **THE PARTIES SHOULD BE REFERRED TO FAMILY MEDIATION CENTER TO**
9 **FORMULATE A PARENTING PLAN**

10 EDCR 5.303 is the requirement for Mandatory Mediation Program. It states in part " all
11 parties to a contested child custody proceeding must attend mediation through the Family Mediation
12 Center (FMC) or through a private mediator before the disposition of the custody matter." Defendant
13 proposes the parties attend mediation to formulate a parenting plan and in the interim follow the
14 Department's Default Holiday Schedule.

15 **THE DEFAULT SHOULD BE SET ASIDE**

16 Defendant's counsel, Louis C. Schneider, had been in contact with the Plaintiff in effort to
17 resolve this matter without Court involvement. Please see attached the emails between Plaintiff and
18 Defendant's counsel attached as EXHIBIT A. Plaintiff, who is a licensed attorney in the State of
19 Nevada, has wilfully misrepresented this Court and intentionally delayed discussing settlement
20 attempting to gain an advantage in Court by submitting a Default. **Plaintiff failed to submit a Three**
21 **Day Notice of Intent to Take Default** allowing Defendant's counsel an opportunity to file the
22 required Answer on her behalf when settlement was no longer on the table. Further Plaintiff has not
23 filed the proper paperwork in this case to facilitate an uncontested hearing. Additionally, **Plaintiff**
24 **cannot act as his own Resident Witness.** Defendant should be allowed her day in Court and
25 therefore the Court should set aside the Default filed herein pursuant to NRCP 60(b).

26 **DEFENDANT SHOULD BE AWARDED PRELIMINARY ATTORNEYS FEES**

27 Defendant should be awarded preliminary attorney fees for having to file this Motion.
28 Defendant has filed a Financial Disclosure Form prior this instant Motion pursuant to EDCR 5.5.506.

LOUIS C. SCHNEIDER, LLC.
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-430-2121

1 Defendant hereby requests to be awarded \$5,000.00 in preliminary attorneys fees. See *Sargeant v.*
2 *Sargeant*, 88 Nev. 223, 495 P.2d 618 (1972), which provides that the Plaintiff should pay a
3 substantial portion of Defendant's attorney's fees and costs in order to level the playing field between
4 them.

5 **III.**

6 **CONCLUSION**

7 WHEREFORE, Defendant prays for relief as follows:

- 8 1. An Order setting aside the Default filed by Plaintiff;
- 9 2. An Order granting Defendant exclusive possession of the marital residence and
10 ordering Plaintiff to assist in making mortgage payments thereon;
- 11 3. An Order confirming the Defendant as primary legal custodian for medical purposes
12 of the two minor children;
- 13 4. An Order awarding Defendant child support retroactive to the date of separation
14 November 2018;
- 15 5. An Order referring the parties to mediation pursuant to EDCR 5.70;
- 16 6. An Order awarding Defendant temporary alimony in the amount of \$800.00 retroactive
17 to the date of separation November 2018;
- 18 7. A preliminary award of attorneys fees and costs; and
- 19 8. Such other and further orders as this Court deems fair and equitable.

20 **DATED** this 7 day of February, 2019.

21
22 
23 **LOUIS C. SCHNEIDER, ESQ.**

Nevada Bar Number: 009683

430 South 7th Street

Las Vegas, Nevada 89101

Ph: 702-435-2121

Fax: 702-431-3807

jhhowardesq@hotmail.com

Attorney for the Defendant/Counterclaimant,
Chalese Solinger

LOUIS C. SCHNEIDER, LLC.
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-430-2121

AFFIDAVIT OF DEFENDANT IN SUPPORT OF MOTION

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

CHALESE M. SOLINGER, having first been duly sworn, deposes and says:

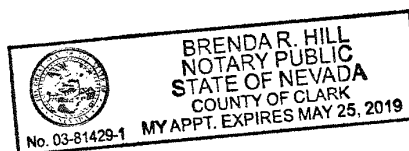
That I am the Plaintiff in the above-referenced matter. I have read the forgoing Motion, and Counterclaim, and the same is true of my own knowledge, except for those matters which are therein stated upon information and belief, and as to those matters, I believe them to be true.


Further affiant sayeth naught.



CHALESE M. SOLINGER

SUBSCRIBED AND SWORN TO before me
this 7th day of February, 2019.





Notary Public in and for said
County and State

EXHIBIT A

2/6/2019

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Re: Solinger v. Solinger

People

Louis C. Schneider <lcslaw@yahoo.com>

Jan 16 at 12:45 PM

To: Adam Solinger

yes I did and I am sorry I confused you two. Any chance you and I can sit down and resolve this quietly?
My cell 702-217-4943
Louis

From: Adam Solinger <adam@702defense.com>
To: Louis C. Schneider <lcslaw@yahoo.com>
Sent: Wednesday, January 16, 2019 11:42 AM
Subject: Re: Solinger v. Solinger

Hey Louis,

I heard you scared Mike Castillo half to death today telling him his wife was divorcing him.

On Thu, Dec 13, 2018 at 9:41 AM Louis C. Schneider <lcslaw@yahoo.com> wrote:

Adam,
She showed it to me but I wasn't left a copy of anything.
She still has not retained me.

Louis

From: Adam Solinger <adam@702defense.com>
To: lcslaw@yahoo.com
Sent: Wednesday, December 12, 2018 3:30 PM
Subject: Re: Solinger v. Solinger

Yes, I'm not represented because I don't really see a need at this point. I'll happily chat with you to see about resolving it. Did she give a copy of my previous offer that expires tonight?

On Wed, Dec 12, 2018 at 3:05 PM Louis C. Schneider <lcslaw@yahoo.com> wrote:

Adam,
I was hoping to be able to speak with you prior to this. Yes she has seen me but has not retained me. Lets talk if you're willing to. If you're represented I am unable to meet without your attorney but I'm sure you know that.
My hope is resolve this informally with a mess.
Louis

From: Adam Solinger <adam@702defense.com>
To: lcslaw@yahoo.com
Sent: Wednesday, December 12, 2018 1:34 PM
Subject: Solinger v. Solinger

Hi Louis,

It's my understanding that you will be representing Chalese in the divorce case. Can you please confirm the same?

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--

Adam M. Solinger, Esq.
LAS VEGAS DEFENSE GROUP, LLC.
2970 W Sahara Avenue
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Office: 702-333-1672
Direct: 702-378-2407
Fax: 702-926-4345

<http://www.shouselaw.com/nevada/adam.html>

Reno Office:
2300 S Virginia Avenue, Suite #800
Reno, NV 89501
Office: 775-348-9685
Direct: 702-378-2407

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Re: Solinger v. Solinger

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Louis

From: Adam Solinger <adam@702defense.com>

To: lcslaw@yahoo.com

Sent: Wednesday, December 12, 2018 3:30 PM

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Re: Solinger v. Solinger

People

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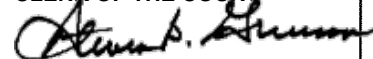
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LOUIS C. SCHNEIDER, LLC.
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-430-2121

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LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number: 009683
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-435-2121
Fax: 702-431-3807
jhhowardesq@hotmail.com
Attorney for the Defendant/Counterclaimant,
Chalese Solinger

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

ADAM M. SOLINGER,
Plaintiff/Counterdefendant,

vs.

CHALESE M. SOLINGER,
Defendant/Counterclaimant.

Case Number: D-19-582245-D
Department: I

Date of Hearing: **3/19/19**
Time of Hearing: **9:00 a.m.**

ORAL ARGUMENT REQUESTED: YES

NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING DATE.

AMENDED MOTION TO SET ASIDE DEFAULT; FOR EXCLUSIVE POSSESSION OF THE MARITAL RESIDENCE AND ORDERING PLAINTIFF TO ASSIST IN MAKING MORTGAGE PAYMENTS; FOR MEDICAL LEGAL CUSTODY OF THE MINOR CHILDREN, FOR AN ORDER REFERRING THE PARTIES TO MEDIATION PURSUANT TO EDCR 5.70, FOR AN ORDER AWARDED DEFENDANT CHILD SUPPORT; FOR AN ORDER AWARDED DEFENDANT ALIMONY; AND FOR ATTORNEY FEES AND COSTS

COMES NOW Defendant, CHALESE M. SOLINGER, by and through her attorney, LOUIS C. SCHNEIDER, ESQ., and moves this Honorable Court for its Order granting the her the following relief:

1. An Order setting aside the Default filed by Plaintiff for failure to file a Three Day Notice of Intent to Take Default;
2. An Order granting Defendant exclusive possession of the marital residence and ordering Plaintiff to assist in making mortgage payments thereon;

1 3. An Order awarding the Defendant primary legal custody for medical purposes of the
2 two minor children;

3 4. An Order awarding Defendant child support retroactive to the date of separation
4 November 2018;

5 5. An Order referring the parties to mediation pursuant to EDCR 5.70;

6 6. An Order awarding Defendant temporary alimony in the amount of \$800.00 retroactive
7 to the date of separation November 2018;

8 7. A preliminary award of attorneys fees and costs to Defendant; and

9 8. Such other and further orders as this Court deems fair and equitable.

10 This Motion is made and based upon the files, the papers and pleadings in this action, the
11 Points and Authorities attached hereto, the Affidavit attached hereto, and any argument of counsel
12 and evidence that may be adduced at the time of Hearing on the within Motion.

13 Dated this 7 day of February, 2019.

14
15 
16 **LOUIS C. SCHNEIDER, ESQ.**
Nevada Bar Number: 009683

17 **NOTICE OF HEARING**

18 **TO: ADAM SOLINGER**, the Defendant; and

19 **TO: HIS ATTORNEY**, if any:

20 **YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE** that the undersigned will
21 bring the above and foregoing **Motion** on for hearing on the **19th** day of **March**,
22 2019, at the hour of **9:00** o'clock **a**.m., in Department I of the above entitled Court, or
23 as soon thereafter as counsel can be heard.

24 Dated this 7 day of February, 2019.

25
26 
27 **LOUIS C. SCHNEIDER, ESQ.**
Nevada Bar Number: 009683
28

I.

STATEMENT OF FACTS

The Plaintiff, ADAM SOLINGER, and Defendant, CHALESE SOLINGER, were married on May 12, 2012 in Clark County, Nevada. They have two (2) minor children born the issue of this marriage, to wit: to-wit: Michael Adam Solinger, born June 16, 2015, and Marie Leona Solinger, born August 28, 2017.

Prior to their marriage, the parties dated since 2008 and moved to Las Vegas, Nevada in 2011. Shortly after marriage, Plaintiff began attending law school in the fall while Defendant worked at the Artiques home furniture store when Defendant became pregnant with their first child, Michael. Defendant was put on bed rest during her pregnancy and was force to give notice and stop working. Once Plaintiff graduated and passed the Nevada Bar Exam he began working for Las Vegas Defense Group. In 2016, Defendant briefly went back to work at the Artiques store when she became pregnant with their daughter Marie. Unfortunately Defendant was again put on bed rest until Marie was born in August, 2017.

It became apparent to Defendant that Plaintiff was more focused on his career then family life. In June of 2018, Plaintiff abandoned Defendant and the children and was missing for a least three days. When Plaintiff returned he stated that he wanted a divorce. The parties attempted to work on their marriage but Plaintiff contributed little to no effort. They attended one counseling session and in October 2018, Plaintiff decided he was completely finished with the Defendant. Again Plaintiff left his family, leaving Defendant solely and fully responsible for the minor children and the household.

II.

POINTS AND AUTHORITIES

DEFENDANT SHOULD BE AWARDED PRIMARY PHYSICAL AND LEGAL CUSTODY OF THE PARTIES' TWO (2) MINOR CHILDREN

As Defendant has been the primary caregiver of the parties' two children, and the parties' son, Michael is in need of corrective surgery. Historically Plaintiff has not been fully involved in the children's daily routine and has left it to the Defendant to fulfill both parental rolls. Plaintiff has

1 threatened Defendant with contacting CPS or that he will be picking up the children from school and
2 not returning them to her for reasons unbeknownst to Defendant. She should be awarded primary
3 physical and primary legal custody of the children to ensure the children are properly cared especially
4 for medically purposes since Plaintiff is completely unreliable. While in NRS 125C.0015 its state
5 that "Parents have joint custody until otherwise ordered by court" it is NRS 125C.035 that provides
6 for the best interest of children and states...

7 Best interests of child: Joint physical custody; preferences; presumptions when court
8 determines parent or person seeking custody is perpetrator of domestic violence or has committed act
9 of abduction against child or any other child.

10 1. In any action for determining physical custody of a minor child, the sole
11 consideration of the court is the best interest of the child. If it appears to the court that
12 joint physical custody would be in the best interest of the child, the court may grant
13 physical custody to the parties jointly.

14 2. Preference must not be given to either parent for the sole reason that the parent
15 is the mother or the father of the child.

16 3. The court shall award physical custody in the following order of preference
17 unless in a particular case the best interest of the child requires otherwise:

18 (a) To both parents jointly pursuant to NRS 125C.0025 or to either parent pursuant
19 to NRS 125C.003. If the court does not enter an order awarding joint physical
20 custody of a child after either parent has applied for joint physical custody, the court
21 shall state in its decision the reason for its denial of the parent's application.

22 (b) To a person or persons in whose home the child has been living and where the
23 child has had a wholesome and stable environment.

24 (c) To any person related within the fifth degree of consanguinity to the child whom
25 the court finds suitable and able to provide proper care and guidance for the child,
26 regardless of whether the relative resides within this State.

27 (d) To any other person or persons whom the court finds suitable and able to
28 provide proper care and guidance for the child.

4. In determining the best interest of the child, the court shall consider and set
forth its specific findings concerning, among other things:

(a) The wishes of the child if the child is of sufficient age and capacity to form an
intelligent preference as to his or her physical custody.

(b) Any nomination of a guardian for the child by a parent.

(c) Which parent is more likely to allow the child to have frequent associations
and a continuing relationship with the noncustodial parent.

(d) The level of conflict between the parents.

(e) The ability of the parents to cooperate to meet the needs of the child.

(f) The mental and physical health of the parents.

(g) The physical, developmental and emotional needs of the child.

(h) The nature of the relationship of the child with each parent.

(i) The ability of the child to maintain a relationship with any sibling.

(j) Any history of parental abuse or neglect of the child or a sibling of the child.

(k) Whether either parent or any other person seeking physical custody has
engaged in an act of domestic violence against the child, a parent of the child or any
other person residing with the child.

(l) Whether either parent or any other person seeking physical custody has
committed any act of abduction against the child or any other child.

1 5. Except as otherwise provided in subsection 6 or NRS 125C.210, a
2 determination by the court after an evidentiary hearing and finding by clear and
3 convincing evidence that either parent or any other person seeking physical custody
4 has engaged in one or more acts of domestic violence against the child, a parent of
5 the child or any other person residing with the child creates a rebuttable presumption
6 that sole or joint physical custody of the child by the perpetrator of the domestic
7 violence is not in the best interest of the child. Upon making such a determination,
8 the court shall set forth:

9 (a) Findings of fact that support the determination that one or more acts of
10 domestic violence occurred; and

11 (b) Findings that the custody or visitation arrangement ordered by the court
12 adequately protects the child and the parent or other victim of domestic violence who
13 resided with the child.

14 6. If after an evidentiary hearing held pursuant to subsection 5 the court
15 determines that each party has engaged in acts of domestic violence, it shall, if
16 possible, then determine which person was the primary physical aggressor. In
17 determining which party was the primary physical aggressor for the purposes of this
18 section, the court shall consider:

19 (a) All prior acts of domestic violence involving either party;

20 (b) The relative severity of the injuries, if any, inflicted upon the persons involved
21 in those prior acts of domestic violence;

22 (c) The likelihood of future injury;

23 (d) Whether, during the prior acts, one of the parties acted in self-defense; and

24 (e) Any other factors which the court deems relevant to the determination.

25 È In such a case, if it is not possible for the court to determine which party is the
26 primary physical aggressor, the presumption created pursuant to subsection 5 applies
27 to both parties. If it is possible for the court to determine which party is the primary
28 physical aggressor, the presumption created pursuant to subsection 5 applies only to
the party determined by the court to be the primary physical aggressor.

 7. A determination by the court after an evidentiary hearing and finding by clear
and convincing evidence that either parent or any other person seeking physical
custody has committed any act of abduction against the child or any other child
creates a rebuttable presumption that sole or joint physical custody or unsupervised
visitation of the child by the perpetrator of the abduction is not in the best interest of
the child. If the parent or other person seeking physical custody does not rebut the
presumption, the court shall not enter an order for sole or joint physical custody or
unsupervised visitation of the child by the perpetrator and the court shall set forth:

 (a) Findings of fact that support the determination that one or more acts of
abduction occurred; and

 (b) Findings that the custody or visitation arrangement ordered by the court
adequately protects the child and the parent or other person from whom the child was
abducted.

 8. For the purposes of subsection 7, any of the following acts constitute
conclusive evidence that an act of abduction occurred:

 (a) A conviction of the defendant of any violation of NRS 200.310 to 200.340,
inclusive, or 200.359 or a law of any other jurisdiction that prohibits the same or
similar conduct;

 (b) A plea of guilty or nolo contendere by the defendant to any violation of NRS
200.310 to 200.340, inclusive, or 200.359 or a law of any other jurisdiction that
prohibits the same or similar conduct; or

 (c) An admission by the defendant to the court of the facts contained in the
charging document alleging a violation of NRS 200.310 to 200.340, inclusive, or
200.359 or a law of any other jurisdiction that prohibits the same or similar conduct.

 9. If, after a court enters a final order concerning physical custody of the child,
a magistrate determines there is probable cause to believe that an act of abduction has
been committed against the child or any other child and that a person who has been

1 awarded sole or joint physical custody or unsupervised visitation of the child has
2 committed the act, the court shall, upon a motion to modify the order concerning
physical custody, reconsider the previous order concerning physical custody pursuant
to subsections 7 and 8.

3 10. As used in this section:

4 (a) "Abduction" means the commission of an act described in NRS 200.310 to
200.340, inclusive, or 200.359 or a law of any other jurisdiction that prohibits the
same or similar conduct.

5 (b) "Domestic violence" means the commission of any act described in NRS
33.018..

6
7 In this case, best interests of the minor children would not only include awarding primary
8 physical custody but also awarding primary legal custody as well. The medical needs of the minor
9 children are a crucial and when a parent willfully stalls or blocks the other parent from gaining
10 necessary medical attention, then the Court has discretion to award primary legal custody. While
11 Defendant should be awarded primary legal custody and primary physical custody she would like
12 Plaintiff to be informed as to the status of any medical needs and will encourage liberal and frequent
13 contact and communication so long as it is without conflict.

14 **DEFENDANT SHOULD BE AWARDED CHILD SUPPORT**

15 Plaintiff should be ordered to pay child support to Defendant consistent with NRS 125B.070
16 and NRS 125B.080. Plaintiff's gross monthly income is unknown at this time as he has not filed his
17 required Financial Disclosure Form assuming he was able to obtain a divorce through a Default and
18 proceed without Defendant. The amount of child support should be retroactive to the official date
19 of separating in this case which is November 2018, and thereafter be payable on the first day of each
20 month until further order of this Court.

21 **DEFENDANT SHOULD BE AWARDED SPOUSAL SUPPORT**

22 Plaintiff was able to attend Law School while Defendant fully supported him by taking care
23 of their minor children and maintaining the household even when Plaintiff abandoned them in June
24 2018 with only a brief return until finally leaving Defendant fully responsible. Plaintiff is able-bodied
25 and capable of paying Defendant the amount of \$800.00 per month as and for temporary spousal
26 support pending Trial.

27 **DEFENDANT SHOULD BE AWARDED EXCLUSIVE POSSESSION OF THE** 28 **MARITAL RESIDENCE**

Defendant wishes to protect her children from any further upsets in their lives regarding the

1 parties' anticipated divorce. Defendant should be awarded exclusive possession of the marital
2 residence during the pendency of the action since Plaintiff chose to leave. This would provide for
3 stability and be less disruptive to the children during this transitional time for them. The children will
4 adjust to the transition easier if Plaintiff is not allowed to come and go as he pleases without
5 Defendant's knowledge. Defendant understands that it is more expensive to support two households
6 and therefore offers to have Plaintiff pay half the rent on the marital residence and utilities during the
7 pendency of the action.

8 **THE PARTIES SHOULD BE REFERRED TO FAMILY MEDIATION CENTER TO**
9 **FORMULATE A PARENTING PLAN**

10 EDCR 5.303 is the requirement for Mandatory Mediation Program. It states in part " all
11 parties to a contested child custody proceeding must attend mediation through the Family Mediation
12 Center (FMC) or through a private mediator before the disposition of the custody matter." Defendant
13 proposes the parties attend mediation to formulate a parenting plan and in the interim follow the
14 Department's Default Holiday Schedule.

15 **THE DEFAULT SHOULD BE SET ASIDE**

16 Defendant's counsel, Louis C. Schneider, had been in contact with the Plaintiff in effort to
17 resolve this matter without Court involvement. Please see attached the emails between Plaintiff and
18 Defendant's counsel attached as EXHIBIT A. Plaintiff, who is a licensed attorney in the State of
19 Nevada, has wilfully misrepresented this Court and intentionally delayed discussing settlement
20 attempting to gain an advantage in Court by submitting a Default. **Plaintiff failed to submit a Three**
21 **Day Notice of Intent to Take Default** allowing Defendant's counsel an opportunity to file the
22 required Answer on her behalf when settlement was no longer on the table. Further Plaintiff has not
23 filed the proper paperwork in this case to facilitate an uncontested hearing. Additionally, **Plaintiff**
24 **cannot act as his own Resident Witness.** Defendant should be allowed her day in Court and
25 therefore the Court should set aside the Default filed herein pursuant to NRCP 60(b).

26 **DEFENDANT SHOULD BE AWARDED PRELIMINARY ATTORNEYS FEES**

27 Defendant should be awarded preliminary attorney fees for having to file this Motion.
28 Defendant has filed a Financial Disclosure Form prior this instant Motion pursuant to EDCR 5.5.506.

LOUIS C. SCHNEIDER, LLC.
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-430-2121

1 Defendant hereby requests to be awarded \$5,000.00 in preliminary attorneys fees. See *Sargeant v.*
2 *Sargeant*, 88 Nev. 223, 495 P.2d 618 (1972), which provides that the Plaintiff should pay a
3 substantial portion of Defendant's attorney's fees and costs in order to level the playing field between
4 them.

5 **III.**

6 **CONCLUSION**

7 WHEREFORE, Defendant prays for relief as follows:

- 8 1. An Order setting aside the Default filed by Plaintiff;
- 9 2. An Order granting Defendant exclusive possession of the marital residence and
10 ordering Plaintiff to assist in making mortgage payments thereon;
- 11 3. An Order confirming the Defendant as primary legal custodian for medical purposes
12 of the two minor children;
- 13 4. An Order awarding Defendant child support retroactive to the date of separation
14 November 2018;
- 15 5. An Order referring the parties to mediation pursuant to EDCR 5.70;
- 16 6. An Order awarding Defendant temporary alimony in the amount of \$800.00 retroactive
17 to the date of separation November 2018;
- 18 7. A preliminary award of attorneys fees and costs; and
- 19 8. Such other and further orders as this Court deems fair and equitable.

20 DATED this 7 day of February, 2019.

21
22
23 
24 **LOUIS C. SCHNEIDER, ESQ.**

Nevada Bar Number: 009683

430 South 7th Street

Las Vegas, Nevada 89101

Ph: 702-435-2121

Fax: 702-431-3807

jhhowardesq@hotmail.com

Attorney for the Defendant/Counterclaimant,

Chalese Solinger

LOUIS C. SCHNEIDER, LLC.
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-430-2121

AFFIDAVIT OF DEFENDANT IN SUPPORT OF MOTION

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

CHALESE M. SOLINGER, having first been duly sworn, deposes and says:

That I am the Plaintiff in the above-referenced matter. I have read the forgoing Motion, and Counterclaim, and the same is true of my own knowledge, except for those matters which are therein stated upon information and belief, and as to those matters, I believe them to be true.

Further affiant sayeth naught.


CHALESE M. SOLINGER

SUBSCRIBED AND SWORN TO before me
this 7th day of February, 2019.


Notary Public in and for said
County and State

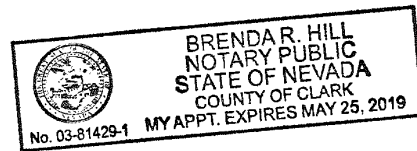


EXHIBIT A

2/6/2019

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Re: Solinger v. Solinger

People

Louis C. Schneider <lcslaw@yahoo.com>

Jan 16 at 12:45 PM

To: Adam Solinger

yes I did and I am sorry I confused you two. Any chance you and I can sit down and resolve this quietly?
My cell 702-217-4943
Louis

From: Adam Solinger <adam@702defense.com>

To: Louis C. Schneider <lcslaw@yahoo.com>

Sent: Wednesday, January 16, 2019 11:42 AM

Subject: Re: Solinger v. Solinger

Hey Louis,

I heard you scared Mike Castillo half to death today telling him his wife was divorcing him.

On Thu, Dec 13, 2018 at 9:41 AM Louis C. Schneider <lcslaw@yahoo.com> wrote:

Adam,

She showed it to me but I wasn't left a copy of anything.
She still has not retained me.

Louis

From: Adam Solinger <adam@702defense.com>

To: lcslaw@yahoo.com

Sent: Wednesday, December 12, 2018 3:30 PM

Subject: Re: Solinger v. Solinger

Yes, I'm not represented because I don't really see a need at this point. I'll happily chat with you to see about resolving it. Did she give a copy of my previous offer that expires tonight?

On Wed, Dec 12, 2018 at 3:05 PM Louis C. Schneider <lcslaw@yahoo.com> wrote:

Adam,

I was hoping to be able to speak with you prior to this. Yes she has seen me but has not retained me. Lets talk if you're willing to. If you're represented I am unable to meet without your attorney but I'm sure you know that.
My hope is resolve this informally with a mess.
Louis

From: Adam Solinger <adam@702defense.com>

To: lcslaw@yahoo.com

Sent: Wednesday, December 12, 2018 1:34 PM

Subject: Solinger v. Solinger

Hi Louis,

It's my understanding that you will be representing Chalese in the divorce case. Can you please confirm the same?

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Network (0)

Yahoo! Groups

My Yahoo! Blog

My Yahoo! Chat

My Yahoo! News

My Yahoo! RSS

My Yahoo!

Notes (2)

Bookmark Ads

Ben Orlan's Blog

Twitter

Star Trek.com

My Yahoo! Weblogs

My Yahoo!

My Yahoo! Photo

My Yahoo! RSS

My Yahoo!

My Yahoo! Groups

My Yahoo!

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<http://www.shouselaw.com/nevada/adam.html>

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Re: Solinger v. Solinger

People

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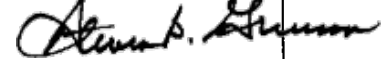
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Eighth Judicial District Court
Family Division
Clark County, Nevada

ADAM MICHAEL SOLINGER,

Case No.: D-19-582245-D

Plaintiff,

Department: "I"

vs.

DATE OF HRG: 03/05/2019

CHALESE MARIE SOLINGER,

TIME OF HRG: 3:30pm

Defendant.

**ORDER SETTING CASE MANAGEMENT CONFERENCE
AND DIRECTING COMPLIANCE WITH NRCP 16.2**

Pursuant to NRCP 16.2, the above-entitled matter is set for a Case Management Conference on 5th day of MARCH, 2019, at the hour of 3:30 p.m. with the Honorable Cheryl B. Moss in Department I, Family Courts and Services of the Eighth Judicial District Court, 601 North Pecos Road, Las Vegas, Nevada 89101. Pursuant to NRCP 16.2(a)(1), you must attend and participate in this court hearing.

Pursuant to NRCP 16.2, **IT IS HEREBY ORDERED** that:

1. Your Financial Disclosure Form must be filed and served within 30 days of the service of the Complaint. You may opt-in to the Detailed Financial Disclosure Form and Complex Litigation procedure by filing and serving a "Request to Opt-in to Detailed Financial Disclosure Form and Complex Litigation Procedure" certifying that:

1 (A) Either party's individual gross income, or the
2 combined gross income of the parties, is more than \$250,000 per
3 year; or

4 (B) Either party is self-employed or the owner, partner,
5 managing or majority shareholder, or managing or majority member
6 of a business; or

7 (C) The combined gross value of the assets owned by
8 either party individually or in combination is more than \$1,000,000.

9 If none of the foregoing applies or neither party filed a Request to
10 Opt-in, you must complete the General Financial Disclosure Form.

11 2. **Concurrently** with the filing of the Financial Disclosure
12 Form, you must provide to the other party initial disclosures
13 mandated by NRCP 16.2(d). Such initial disclosures shall include the
14 following information and documentation:

15 (A) **Bank and Investment Statements.** Copies of all
16 monthly or periodic bank, checking, savings, brokerage, investment,
17 and security account statements in which any party has or had an
18 interest for the period commencing 6 months prior to the service of
19 the Summons and Complaint through the date of the disclosure;

20 (B) **Credit Card and Debt Statements.** Copies of credit
21 card statements and debt statements for all parties for all months for
22 the period commencing 6 months prior to the service of the Summons
23 and Complaint through the date of disclosure;

24 (C) **Real Property.** Copies of all deeds, deeds of trust,
purchase agreements, escrow documents, settlement sheets, and all
other documents that disclose the ownership, legal description,

1 purchase price, and encumbrances of all real property owned by any
2 party;

3 **(D) Property Debts.** Copies of all monthly or periodic
4 statements and documents showing the balances owing on all
5 mortgages, notes, liens, and encumbrances outstanding against all
6 real property and personal property in which the party has or had an
7 interest for the period commencing 6 months prior to the service of
8 the Summons and Complaint through the date of the disclosure; or if
9 no monthly or quarterly statements are available during this time
10 period, the most recent statements or documents that disclose the
information;

11 **(E) Loan Applications.** Copies of all loan applications that
12 a party has signed within 12 months prior to the service of the
13 Summons and Complaint through the date of the disclosure;

14 **(F) Promissory Notes.** Copies of all promissory notes
15 under which a party either owes money or is entitled to receive
16 money;

17 **(G) Deposits.** Copies of all documents evidencing money
18 held in escrow or by individuals or entities for the benefit of either
19 party;

20 **(H) Receivables.** Copies of all documents evidencing loans
or monies due to either party from individuals or entities;

21 **(I) Retirement and Other Assets.** Copies of all monthly or
22 periodic statements and documents showing the value of all pension,
23 retirement, stock option, and annuity balances, including individual
24 retirement accounts, 401(k) accounts, and all other retirement and

1 employee benefits and accounts in which any party has or had an
2 interest for the period commencing 6 months prior to the service of
3 the Summons and Complaint through the date of the disclosure; or if
4 no monthly or quarterly statements are available during this time
5 period, the most recent statements or documents that disclose the
6 information;

7 **(J) Insurance.** Copies of all monthly or periodic
8 statements and documents showing the cash surrender value, face
9 value, and premiums charged for all life insurance policies in which
10 any party has or had an interest for the period commencing 6 months
11 prior to the service of the Summons and Complaint through the date
12 of the disclosure; or if no monthly or quarterly statements are
13 available during this time period, the most recent statements or
documents that disclose the information;

14 **(K) Insurance Policies.** Copies of all policy statements
15 and evidence of costs of premiums for health and life insurance
16 policies covering either party or any child of the relationship;

17 **(L) Values.** Copies of all documents that may assist in
18 identifying or valuing any item of real or personal property in which
19 any party has or had an interest for the period commencing 6 months
20 prior to the service of the Summons and Complaint through the date
21 of the disclosure, including any documents that the party may rely
22 upon in placing a value on any item of real or personal property (i.e.,
appraisals, estimates, or official value guides);

23 **(M) Tax Returns.** Copies of all personal and business tax
24 returns, balance sheets, profit and loss statements, and all

1 documents that may assist in identifying or valuing any business or
2 business interest for the last 5 completed calendar or fiscal years
3 with respect to any business or entity in which any party has or had
4 an interest within the past 12 months;

5 (N) **Proof of Income.** Proof of income of the party from all
6 sources, specifically including W-2, 1099, and K-1 forms, for the past
7 2 completed calendar years, and year-to-date income information
8 (paycheck stubs, etc.) for the period commencing 6 months prior to
9 the service of the Summons and Complaint through the date of the
10 disclosure; and

11 (O) **Personalty.** A list of all items of personal property
12 with an individual value exceeding \$200, including, but not limited
13 to, household furniture, furnishings, antiques, artwork, vehicles,
14 jewelry, coins, stamp collections, and similar items in which any
15 party has an interest, together with the party's estimate of current
16 fair market value (not replacement value) for each item.

17 (P) **Exhibits.** A copy of every other document or exhibit,
18 including summaries of other evidence, that a party expects to offer
19 as evidence at trial in any manner.

20 3. No later than (90 days after the Financial Disclosure Form
21 is due), you must disclose the identity of any witnesses (any person
22 who may be used at trial to present evidence pursuant to NRS
23 50.275, 50.285, and 50.305). If the evidence is intended solely to
24 contradict or rebut evidence on the same subject matter, the
disclosure must be within 21 days after the disclosure made by the
other party.

1 4. No later than (45 days after service of the Answer), you and,
2 if you have an attorney, your attorney, must meet for an Early Case
3 Conference. This conference is intended for the purpose of ensuring
4 compliance with the initial disclosure rules (see paragraph 2; NRC
5 16.2(d)). The Plaintiff shall designate the time and place of each
6 meeting, which must be held in the county where the action was
7 filed, unless the parties agree upon a different location. You and the
8 other party may submit a Stipulation and Order to continue the time
9 for the case conference for an additional period of not more than 60
10 days, which the court may, in its discretion and for good cause
11 shown, enter. Absent compelling and extraordinary circumstances,
12 neither the court nor the parties may extend the time to a day more
13 than 90 days after service of the Answer. The time for holding a case
14 conference with respect to a defendant who has filed a motion
15 pursuant to Rule 12(b)(2)-(4) is tolled until entry of an order denying
the motion.

16 5. Early Case Conference Report. Within 15 days after the case
17 conference, but not later than (5 days prior to the scheduled case
18 management conference), you must file a joint early case conference
19 report, or if you and the other side are unable to agree upon the
20 contents of a joint report, you must serve and file an early case
21 conference report, which, either as a joint or individual report, must
contain:

22 (A) A statement of jurisdiction;

23 (B) A brief description of the nature of the action and each
24 claim for relief or defense;

1 (C) If custody is at issue in the case, a proposed custodial
2 timeshare and a proposed holiday, special day, and vacation
3 schedule;

4 (D) A written list of all documents provided at or as a
5 result of the case conference, together with any objection that the
6 document is not authentic or genuine. The failure to state any
7 objection to the authenticity or genuineness of a document
8 constitutes a waiver of such objection at a subsequent hearing or
9 trial. For good cause, the court may permit the withdrawal of a
10 waiver and the assertion of an objection;

11 (E) A written list of all documents not provided under
12 Rule 16.2(d), together with the explanation as to why each document
13 was not provided;

14 (F) For each issue in the case, a statement of what
15 information and/or documents are needed, along with a proposed
16 plan and schedule of any additional discovery;

17 (G) A list of the property (including pets, vehicles, real
18 estate, retirement accounts, pensions, etc.) that each litigant seeks to
19 be awarded in this action;

20 (H) The list of witnesses exchanged in accordance with
21 Rule 16.2(d)(5) and (d)(6);

22 (I) Identification of each specific issue preventing
23 immediate global resolution of the case along with a description of
24 what action is necessary to resolve each issue identified;

(J) A litigation budget; and

(K) Proposed trial dates.

1 6. You are under the continuing obligation to supplement any
2 disclosures required herein or by court rule. You must make
3 additional or amended disclosures whenever new or different
4 information is discovered or revealed. Such additional or amended
5 disclosures, including corrections to your financial disclosure form,
6 shall be made within 14 days after acquiring the additional
7 information or after otherwise learning that your disclosure is
8 incomplete or incorrect. However, if a hearing, deposition, case
9 management conference, or other calendared event is scheduled less
10 than 14 days from the discovery date, then the update must be filed
and served within 24 hours of the discovery of new information.

11 7. If you fail to timely complete, file, or serve the appropriate
12 financial disclosure form required by this rule, or the required
13 information and disclosures under this rule, the court shall impose
14 an appropriate sanction upon you, your attorney, or both, unless
15 specific affirmative findings of fact are made that you have proven:
16 (1) either good cause for the failure by a preponderance of the
17 evidence or that the violating party would experience an undue
18 hardship if the penalty is applied; and (2) that other means fully
19 compensate the nonviolating party for any losses, delays, and
20 expenses suffered as a result of the violation. Sanctions may include:

21 (A) An order finding the violating party in civil contempt
22 of court, an order requiring the violating party to timely file and
23 serve the disclosures, to pay the opposing party's reasonable
24 expenses including attorney fees and costs incurred as a result of the

1 failure, and any other sanction the court deems just and proper;
2 and/or


3 (B) An order refusing to allow the violating party to
4 support or oppose designated claims or defenses, or prohibiting that
5 party from introducing designated matters in evidence, and/or any
6 other sanction the court deems just and proper.

7 8. Failure to include any asset or accurately report income will
8 result in sanctions if the nonviolating party can establish by a
9 preponderance of the evidence that there is not good cause for the
10 failure. Sanctions may include:

11 (A) An order finding the violating party in civil contempt
12 of court, an award of reasonable attorney fees and costs to the
13 nonviolating party, and any other sanction the court deems just and
14 proper; and/or

15 (B) An order awarding the omitted asset to the opposing
16 party as his or her separate property or making another form of
17 unequal division of community property, and/or any other sanction
18 the court deems just and proper.

19 Dated this 7th day of February, 2019.

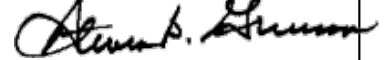
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21 CHERYL B. MOSS
22 District Court Judge
23
24

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I electronically served, faxed, emailed, or placed in the appropriate attorney folder located in the Clerk of the Court's Office, a copy of the Amended Order Setting Case Management Conference and Directing Compliance with NRCP 16.2 to:

LOUIS C. SCHNEIDER, ESQ.
430 South 7th Street
Las Vegas, Nevada 89101
lcslawllc@gmail.com
Attorney for Defendant

Page 10 of 10



1 OFFM

2 DISTRICT COURT
3 FAMILY DIVISION
4 CLARK COUNTY, NEVADA

5 ADAM M. SOLINGER, Plaintiff
6 vs.
7 CHALESE M. SOLINGER, Defendant.

Case No.: D-19-582245-D

Department I

8 ORDER FOR FAMILY MEDIATION
9 CENTER SERVICES

10 IT IS HEREBY ORDERED that, in the spirit of preserving the parents' right to make decisions
11 about the future best interest of their child(ren), the above-named parties will make every attempt to
12 resolve their disputes.

13 IT IS FURTHER ORDERED by the Court that, regarding the child(ren) at issue, the Family
14 Mediation Center (FMC) shall:

- 15 ☒ Provide Confidential Mediation _____
16 (When telephone mediation is ordered, one or both parties must reside out-of-state)

17 ☐ Include a Domestic Violence Protocol

18 ☐ Interview Child(ren) _____

19 Issues: _____
20 _____
21 _____

22 ☐ Reunify Parent/Child(ren) _____

23 IT IS FURTHER ORDERED that the cost of mediation will be assessed using a sliding scale
24 based on each litigant's individual financial status with a maximum cost of \$300.00 per person.
25 Child(ren) interviews are \$50.00 per child per litigant. Parent/Child(ren) reunifications are \$50.00
26 per litigant.

27 IT IS FURTHER ORDERED that the parties and/or their attorneys must report to the Family
28 Mediation Center at 601 N. Pecos Road, Las Vegas, NV 89101, phone (702) 455-4186.

DATED this 7th day of February, 2019.

This matter is reset for

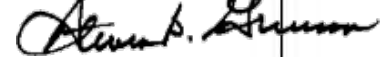
24 Date: MARCH 5, 2019 Time: 3:30 p.m.



CHERYL B. MOSS
District Court Judge

25 Attorney for Plaintiff: Adam M. Solinger, Esq.

26 Attorney for Defendant: Louis C. Schneider, Esq.



1 **NOA**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

4 Tel: (702) 222-4021

Fax: (702) 248-9750

5 Email: vmgroup@theabramslawfirm.com

Attorney for Plaintiff

Eighth Judicial District Court

Family Division

Clark County, Nevada

9 ADAM MICHAEL SOLINGER,

) Case No.: D-19-582245-D

10 Plaintiff,

) Department: I

11 vs.

12 CHALESE MARIE SOLINGER,

13 Defendant.

14
15 **NOTICE OF APPEARANCE OF ATTORNEY**

16 PLEASE TAKE NOTICE that Vincent Mayo, Esq., of The Abrams &
17 Mayo Law Firm, hereby appears on behalf of Plaintiff, Adam Michael
18 Solinger, in the above entitled matter.

19 ///

20 ///

21 ///

1 All future correspondence, communications and pleadings shall be
2 directed to the aforementioned as counsel of record.

3 DATED Thursday, February 14, 2019.

4 Respectfully Submitted,


5 THE ABRAMS & MAYO LAW FIRM

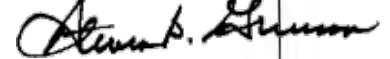
6
7 Vincent Mayo, Esq.
8 Nevada State Bar Number: 8564
9 6252 South Rainbow Blvd., Suite 100
10 Las Vegas, Nevada 89118
11 Attorney for Plaintiff

12 **CERTIFICATE OF SERVICE**

13 I hereby certify that the foregoing NOTICE OF APPEARANCE OF
14 ATTORNEY was filed electronically with the Eighth Judicial District
15 Court in the above-entitled matter, on Thursday, February 14, 2019.
16 Electronic service of the foregoing document shall be made in
17 accordance with the Master Service List, pursuant to NEFCR 9, as
18 follows:

19 Louis Schneider, Esq.
20 Attorney for Defendant

21

An Employee of The Abrams & Mayo Law Firm



1 **PET**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

4 Tel: (702) 222-4021

Fax: (702) 248-9750

5 Email: VMGroup@theabramslawfirm.com

Attorney for Plaintiff

Eighth Judicial District Court

Family Division

Clark County, Nevada

8 ADAM MICHAEL SOLINGER,

9 Plaintiff,

10 vs.

11 CHALESE MARIE SOLINGER,

12 Defendant.

) Case No.: D-19-582245-D

) Department: I

14 **PETITION TO SEAL RECORDS PURSUANT TO NRS 125.110(2)**

15 **NOW INTO COURT** comes Plaintiff, Adam Michael Solinger, by
16 and through his attorney of record, Vincent Mayo, Esq., of The Abrams
17 & Mayo Law Firm, and hereby requests that this action be sealed
18 pursuant to NRS 125.110(2), which states:

19 1. In any action for divorce, the following papers and
20 pleadings in the action shall be open to public inspection in
the clerk's office:

21 (a) In case the complaint is not answered by the
defendant, the summons, with the affidavit or proof of
service; the complaint with memorandum endorsed thereon

1 that the default of the defendant in not answering was
2 entered, and the judgment; and in case where service is
3 made by publication, the affidavit for publication of
summons and the order directing the publication of
summons.

4 (b) In all other cases, the pleadings, the finding of the
5 court, any order made on motion as provided in Nevada
6 Rules of Civil Procedure, and the judgment.

7 2. All other papers, records, proceedings and evidence,
8 including exhibits and transcript of the testimony, shall,
9 upon the written request of either party to the action, filed
10 with the clerk, be sealed and shall not be open to inspection
11 except to the parties or their attorneys, or when required as
12 evidence in another action or proceeding.

13 Accordingly, this matter shall not be open to inspection except to
14 the parties and/or their attorneys, or when required as evidence in
15 another action or proceeding.

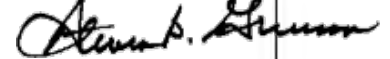
16 Dated: Thursday, February 14, 2019.

17 Respectfully Submitted,

18 THE ABRAMS & MAYO LAW FIRM

19
20
21

Vincent Mayo, Esq.
Nevada State Bar Number: 8564
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Attorney for Plaintiff



1 **NECC**
Vincent Mayo, Esq.
2 Nevada State Bar Number: 8564
THE ABRAMS & MAYO LAW FIRM
3 6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
4 Tel: (702) 222-4021
Fax: (702) 248-9750
5 Email: vmgroup@theabramslawfirm.com
Attorney for Plaintiff

Eighth Judicial District Court
Family Division
Clark County, Nevada

9 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
10 Plaintiff,) Department: I
11 vs.)
12 CHALESE MARIE SOLINGER,)
13 Defendant.)

15 **NOTICE OF 16.2 EARLY CASE CONFERENCE**

16 **PLEASE TAKE NOTICE** that pursuant to NRCP 16.2, the Early
17 Case Conference will be held on February 25, 2019 at 1:00 p.m., at The
18 Abrams & Mayo Law firm, 6252 South Rainbow Blvd., Suite 100, Las
19 Vegas, Nevada 89118.

20 ///

21 ///

1 Please mark your calendar and plan to be available.

2 DATED Thursday, February 21, 2019.

3 Respectfully Submitted,

4 THE ABRAMS & MAYO LAW FIRM

5
6 Vincent Mayo, Esq.

Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100


7 Las Vegas, Nevada 89118

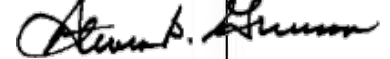
8 Attorney for Plaintiff

9 **CERTIFICATE OF SERVICE**

10 I hereby certify that the foregoing NOTICE OF 16.2 EARLY CASE
11 CONFERENCE was filed electronically with the Eighth Judicial District
12 Court in the above-entitled matter, on Thursday, February 21, 2019.
13 Electronic service of the foregoing document shall be made in
14 accordance with the Master Service List, pursuant to NEFCR 9, as
15 follows:

16 Louis C. Schneider, Esq.
17 Attorney for Defendant

18
19
20
21

An Employee of The Abrams & Mayo Law Firm



1 **RTCC**

2 Vincent Mayo, Esq.

3 Nevada State Bar Number: 8564

4 THE ABRAMS & MAYO LAW FIRM

5 6252 South Rainbow Blvd., Suite 100

6 Las Vegas, Nevada 89118

7 Tel: (702) 222-4021

8 Fax: (702) 248-9750

9 Email: vmgroup@theabramslawfirm.com

10 Attorney for Plaintiff

11 Eighth Judicial District Court
12 Family Division
13 Clark County, Nevada

14 ADAM MICHAEL SOLINGER,

15 Plaintiff,

16 vs.

17 CHALESE MARIE SOLINGER,

18 Defendant.

) Case No.: D-19-582245-D

) Department: I

19 **REPLY TO COUNTERCLAIM FOR DIVORCE**

20 **COMES NOW** Plaintiff/Counterdefendant, ADAM MICHAEL
21 SOLINGER, by and through his attorney of record, Vincent Mayo, Esq.,
22 of The Abrams & Mayo Law Firm, and hereby submits his *Reply* to
23 Defendant/Counterclaimant's *Counterclaim for Divorce*.
24

1 1. Plaintiff/Counterdefendant admits the allegations set forth
2 in paragraphs 1, 2, 3, 4, 6, 8, 11, 16 and 18 of the *Counterclaim for*
3 *Divorce*.

4 2. Plaintiff/Counterdefendant denies the allegations set forth in
5 paragraphs 7, 14 and 15 of the *Counterclaim for Divorce*.

6 3. Plaintiff/Counterdefendant acknowledges that paragraph
7 number 5 is missing from the *Counterclaim for Divorce*.

8 4. As to paragraph 9 of the *Counterclaim for Divorce*,
9 Plaintiff/Counterdefendant admits that child support should be set in
10 accordance with NRS 125B.070 and NRS 125B.080, depending on the
11 custodia award, but denies the remaining allegations, including child
12 support should be retroactive to the date of separation, November 2018.
13

14 5. As to paragraph 10 of the *Counterclaim for Divorce*,
15 Plaintiff/Counterdefendant admits that he shall continue to provide
16 medical, dental and optical health insurance for the minor children but
17 denies that he should solely bear the costs of same.
18

19 6. As to paragraphs 11 and 12 of the *Counterclaim for Divorce*,
20 Plaintiff/Counterdefendant admits that there is community property
21 and debts to be divided in the divorce but denies
22 Defendant/Counterclaimant's definition for the division of same under
23 Nevada law.
24

1 7. As to paragraph 17 of the *Counterclaim for Divorce*,
2 Plaintiff/Counterdefendant admits that the parties should file married
3 filing jointly for the 2018 taxes but denies that from 2019 and each and
4 every year thereafter Defendant should claim the minor children for tax
5 purposes.
6

7 DATED Monday, February 25, 2019.

8 Respectfully Submitted,

9 THE ABRAMS & MAYO LAW FIRM

10
11
12 _____
13 Vincent Mayo, Esq.
14 Nevada State Bar Number: 8564
15 6252 South Rainbow Blvd., Suite 100
16 Las Vegas, Nevada 89118
17 Tel: (702) 222-4021
18 Fax: (702) 248-9750
19 Attorney for Plaintiff/Counterdefendant
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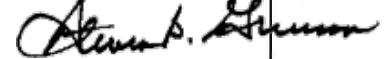
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1 **OPPC**

2 Vincent Mayo, Esq.
3 Nevada State Bar Number: 8564
4 THE ABRAMS & MAYO LAW FIRM
5 6252 South Rainbow Blvd., Suite 100
6 Las Vegas, Nevada 89118
7 Tel: (702) 222-4021
8 Fax: (702) 248-9750
9 Email: VMGroup@theabramslawfirm.com
10 Attorney for Plaintiff

11 Eighth Judicial District Court
12 Family Division
13 Clark County, Nevada

14 ADAM MICHAEL SOLINGER,)	Case No.: D-19-582245-D
)	
15 Plaintiff,)	Department: I
16 vs.)	19th
)	Date of Hearing: March 5, 2019
17 CHALESE MARIE SOLINGER,)	Time of Hearing: 3:30 p.m.
)	
18 Defendant.)	9:00 am

19 **OPPOSITION TO AMENDED MOTION TO SET ASIDE**
20 **DEFAULT; FOR EXCLUSIVE POSSESSION OF THE MARITAL**
21 **RESIDENCE AND ORDERING PLAINTIFF TO ASSIST IN**
MAKING MORTGAGE PAYMENTS; FOR MEDICAL LEGAL
CUSTODY OF THE MINOR CHILDREN; FOR AN ORDER
REFERRING THE PARTIES TO MEDIATION PURSUANT TO
EDCR 5.70, FOR AN ORDER AWARDING PLAINTIFF CHILD
SUPPORT; FOR AN ORDER AWARDING DEFENDANT
ALIMONY; AND FOR ATTORNEY'S FEES AND COSTS
PRIMARY PHYSICAL CUSTODY, CHILD SUPPORT, AND
ATTORNEY'S FEES AND COSTS AND
COUNTERMOTION FOR JOINT LEGAL CUSTODY; PRIMARY
PHYSICAL CUSTODY TO PLAINTIFF AND SUPERVISED
VISITATION TO DEFENDANT; TO ESTABLISH CHILD
SUPPORT; TO ESTABLISH PAYMENT OF MARITAL
EXPENSES; FOR AN ORDER PROTECTING THE PARTIES'
COMMUNITY PROPERTY; DEFENDANT TO OBTAIN
EMPLOYMENT AND TO COOPERATE IN A VOCATIONAL
ASSESSMENT

1 **NOW INTO COURT** comes Plaintiff, ADAM M. SOLINGER, by
2 and through his attorney of record, Vincent Mayo, Esq., of The Abrams
3 & Mayo Law Firm, and hereby submits his *Opposition and*
4 *Countermotion*.

5 This *Opposition and Countermotion* is made and based upon the
6 attached Points and Authorities, the Affidavit of Plaintiff attached
7 hereto, the Appendix of Exhibits in support, all papers and pleadings on
8 file herein, and any oral argument adduced at the hearing of this matter.

9 Dated Tuesday, February 26, 2019.

10 Respectfully Submitted,

11 THE ABRAMS & MAYO LAW FIRM

12
13 /s/ Vincent Mayo, Esq.
14 Vincent Mayo, Esq.
15 Nevada State Bar Number: 8564
16 6252 South Rainbow Blvd., Suite 100
17 Las Vegas, Nevada 89118
18 Attorney for Plaintiff
19
20
21

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. STATEMENT OF FACTS**

3 **Background**

4 Plaintiff, ADAM SOLINGER (“Adam”) and Defendant, CHALESE
5 SOLINGER, were married on May 12, 2012 in Las Vegas, Nevada. There
6 are two (2) minor children of the marriage, to wit: Michael Adam
7 Solinger (“Michael”), born June 16, 2015 (3 years of age); and Marie
8 Leona Solinger (“Marie”), born August 28, 2017 (1 year of age). Adam is
9 30 years old and Chalese is 28 years old.

10 The parties met and began dating in 2008. They mutually decided
11 to move to Nevada in 2011 from California and married the following
12 year. Adam did attend law school at UNLV but Adam’s parents paid for
13 all of Adam’s law school. Further, Adam’s parents provided the parties
14 with monies for monthly expenses. Hence, the money Chalese earned
15 was essentially “fun money,” nothing else. Adam now works as an
16 associate attorney at a law firm making \$120,000 per year.

17 Chalese has worked before, primarily as a cosmetologist in Nevada
18 and at a furniture store, Artiques, upon the parties moving to Las Vegas.
19 Chalese in fact worked up through the first pregnancy and planned to
20 return to work afterwards.

21 ///

1 In 2018, the parties started experiencing marital difficulties
2 related to Chalese's increasingly erratic and hostile behavior. The parties
3 attempted counseling but they had by that point become irreconcilable.
4 Adam offered to move out of the marital residence in order to help keep
5 things amiable and in fact did so, moving into a friend's house at the end
6 of October 2018, then to an apartment in the first week on November.

7 **Adam's Daily Involvement in the Children's Lives**

8 Despite working full-time, Adam remained actively involved in the
9 children's day to day lives.¹ Adam assisted with waking the children in
10 the morning, helping prepare their breakfast, etc. He also helped make
11 dinner upon returning from work, reading to and playing with the
12 children, bathing them and putting them to sleep. Adam also attends
13 medical appointments, attends playdates on weekends and generally
14 shows the children love and affection.

15 Chalese has known Adam is a good father, which is why the parties
16 have been sharing joint physical custody. This schedule has consisted of
17 Adam having the children on Wednesdays at around 5:30 p.m. when
18
19

20 ¹ It is of note that Adam's work hours were more regimented when he was
21 doing criminal work (due to court appearances). However, Adam switched to
personal injury, providing him much more flexibility. This flexibility includes Adam
being able to come into work later and take off of work early.

1 Adam picks them up from daycare² and returning them to Chalese on
2 Sundays at around 8:00 a.m. to 9:00 a.m.

3 Hence, Chalese cannot truthfully challenge Adam's fitness or
4 commitment to the children's care and welfare. Upon consulting with
5 counsel though, Chalese became combative and started resorting to lies
6 in a desperate attempt to try and gain an advantage in this case. Chalese
7 first claimed Adam "abandoned" her and the children for three days in
8 June 2018. Regardless of the fact this was eight months ago, Adam did
9 not "abandon his family." What actually happened is that Adam's
10 grandfather died and he had to go to California to attend the funeral.
11 Attached is the obituary evidencing the date of the funeral³ and texts
12 between the parties during that weekend.⁴ It is of note that Adam is
13 constantly asking about the children in the texts.

14 Chalese next claimed Adam was neglecting his son Michael's medical
15 needs – an outright fabrication. In fact, if anyone was neglecting
16 Michael's health, it was Chalese. The first incident involved Chalese
17 wanting Michael to undergo an invasive procedure requiring putting
18 Michael under via anesthesia to see if Michael had a hernia. While Adam

19 ² It is notable that Chalese is the one who stated she could not care for the
20 children daily and needed time for herself, in addition to the fact the parties wanted
the children socializing with other children.

21 ³ See Gregory Cooper's obituary, attached as **Exhibit 1**.

⁴ See the texts, attached as **Exhibit 2**.

1 certainly wanted his son's health to be addressed, and had done so in the
2 past, he was concerned that Michael had already undergone three
3 general anesthesia surgeries in one year alone and that repeated or
4 lengthy exposure to general anesthesia can harm brain development, per
5 the FDA's 2016 findings – something Michael's doctor agreed was a
6 legitimate concern. Hence, Adam wanted to be sure the procedure was
7 necessary and there was no other way to diagnosis Michael's condition
8 without requiring anesthesia. Chalese had nevertheless insisted on the
9 procedure, despite Adam's concerns, so Adam met with Michael's
10 doctor. Michael's doctor admitted that he had not detected any bulge or
11 symptoms related to a hernia and that Michael had pointed to his
12 stomach as the area of discomfort, not where he previously had a hernia.
13 The doctor also noted that noninvasive testing prior to another
14 procedure would be preferable. Hence, the doctor made the call to cancel
15 the surgery and pursue other testing, not Adam.

16 Second, a doctor had prescribed Michael antibiotics for strep
17 throat. However, when Adam went to the pharmacy, to pick up the
18 medication, the pharmacist stated that if Michael did not have any
19 symptoms, Adam should wait on administering the antibiotics. Adam
20 followed the pharmacist's instructions and because there were no
21 symptoms, did not administer the medication. Adam later told this to

1 the doctor's office and they stated it wasn't his fault and the doctor's
2 office addressed the matter directly with the pharmacy. It is of note
3 though that Michael never developed strep throat.

4 **Chalese's Fitness Issues and Neglect of the Marital Home**

5 Whatever issues Chalese had during the last year have worsened
6 since Adam moved out of the marital residence. These include Chalese's
7 rampant use of drugs and alcohol. Adam was set to drop the children off
8 one day in the morning and told Chalese he was on his way. Chalese,
9 sounding erratic in her text messages, told Adam not to return the
10 children until the afternoon. Concerned about Chalese's tone and since
11 he was already on the way, Adam went to the marital residence. Upon
12 arriving, Chalese was in her room and did not come out. Adam noticed
13 that the home was an utter mess, with piles of dishes in the sink, dirty
14 clothes strewn about,⁵ hard liquor filling a substantial part of the fridge,
15 and an empty case of beer on the kitchen counter. When Adam then
16 went into the garage to leave with the children, he noticed a homemade
17 bong.⁶ Adam was about to take the children and leave when Chalese
18 came in to the garage, acting strangely.

19
20 ⁵ See the photos of house, attached as **Exhibit 3**. Please note that Adam also
has a video of his walk through the house, which can be made available.

21 ⁶ See the photos of the bong, the photos of the lighters, grains of pot and tool
used to clean out the bong filter, lighters and grains of pot still lying around,
attached as **Exhibit 4**.

1 Adam left but came back another day, again finding the house
2 filthy, dishes piled in the kitchen, etc. The children were also in dirty
3 clothes. Adam again went into the garage and this time the smell of
4 marijuana permeated the space and was everywhere, including the
5 children's toys. There were also lighters, remnants of marijuana spread
6 around and a tool being used to clean the bong screen. The homemade
7 bong was still present. Chalese admitted to same in a text.⁷ Adam also
8 found a purse in the garage filled with Budweiser cans of beer and a case
9 of beer that was not there the first time was empty.⁸ Adam spoke to
10 Chalese and told her of his concerns. Chalese claimed she did not use the
11 drugs when the children were present but based on the scattered
12 marijuana flakes and poignant smell of marijuana when Adam picked up
13 the children, Chalese was obviously not being truthful. Chalese then
14 referred to Adam's concerns as "legal bullshit" and told him to "stay out
15 of people's houses you don't belong in" (despite the home being
16 community property).⁹ Chalese next retaliated by withholding the
17 children from Adam, stating that if he promised to bring them back
18 every Sunday, no matter what, he could have them. Adam said he would
19 not agree to such a demand, emphasizing that if there are issues with

20 ⁷ See the text from Chalese, attached as **Exhibit 5**.

21 ⁸ See the photo of Chalese's purse filled with beer, attached as **Exhibit 6**.

⁹ See **Exhibit 5**.

1 Chalese or her parenting, he had to do what was necessary to protect the
2 children.

3 The next time Adam came over, there was a truck in the driveway
4 and was told some man was living in the home. Chalese did not speak to
5 Adam before allowing the man to live in his home nor did she get
6 Adam's consent. Adam believes this is the man that Chalese has been
7 seeing and who has been encouraging her to smoke and drink more.
8 Even more concerning is that the man has a son also living at the home.

9 Adam knew nothing else about the man living in his home with the
10 parties' children and Chalese was not forthcoming so Adam insisted on
11 Chalese disclosing more information. Chalese eventually stated Adam
12 could meet the man, who Chalese referred to as "Josh," but when Adam
13 went over to the home to do so, the man refused.

14 Adam did some additional research and learned the man's name is
15 Josh Floyd and quite a bit more. Chalese withdrew \$7,500 from the
16 parties' bank account and now there is a photo of Chalese with a
17 diamond ring on her wedding ring finger that she did not previously own
18 (and not the same wedding ring Adam bought her).¹⁰ Further, there is a
19 photo of Josh on his Facebook account showing off a men's wedding ring
20 (with black diamonds and gold) on his wedding ring finger stating it is

21 ¹⁰ See the photo of Chalese and Josh with Chalese wearing a diamond ring,
attached as **Exhibit 7**.

1 from Jared's.¹¹ This is the exact same time Chalese has her ring on.
2 Evidently, Chalese and Josh are already engaged.

3 Chalese is also further taking over the parties' home by allowing
4 Josh to do what he wants with the parties' community property. In a
5 photo, Josh is seen wearing Adam's clothes (with Chalese wearing the
6 matching shirt),¹² using Adam's tools and worst, selling community
7 property. Josh's Facebook account has postings of the parties' washer
8 and dryer, treadmill, bike rack, etc., for sale.¹³ To be clear, the parties
9 never discussed selling any community property and Adam did not
10 consent. Upon learning same, Adam had Mr. Mayo immediately send
11 Chalese's counsel a seize and assist letter.¹⁴ Adam is concerned as there
12 are more valuable items in the parties' home, such as an extensive art
13 collection,¹⁵ and there is a travel trailer parked in his drive way. There is
14 also another dog living at the home, bringing the total to five dogs.
15 Hence, there are two adults, three children and five dogs living in the
16 parties' home.

17 ///

18
19 ¹¹ See the post regarding Josh's ring, attached as **Exhibit 8**.

¹² See **Exhibit 7**.

20 ¹³ See the post wherein Josh lists community property for sale, attached as **Exhibit 9**.

21 ¹⁴ See the February 22, 2019 correspondence, attached as **Exhibit 10**.

¹⁵ See the photos of the art collection, attached as **Exhibit 11**.

1 **Chalese's Failure to File an Answer**

2 Adam realized the parties were beyond reconciliation so he filed
3 for divorce. He was told Louis Schneider would be representing Chalese
4 so he made contact with Mr. Schneider on December 12th and asked if he
5 could confirm. Mr. Schneider never did, stating he had not been retained
6 by Chalese. This is evidenced by the emails Mr. Schneider attached to his
7 motion. As Mr. Schneider never made an appearance nor was willing to
8 accept service, Adam had Chalese served on January 7th and after failing
9 to timely file an Answer, Adam defaulted Chalese on January 29th.

10 **II. OPPOSITION AND COUNTERMOTION**

11 **A. Chalese Was Properly Defaulted**

12 Adam followed the proper procedures in obtaining a default
13 against Chalese. Further, Chalese has no good faith reason under NRCP
14 55(c) upon which to set aside the default. Her only alleged defense is
15 that Mr. Schneider should have been served a notice of intent to take
16 default. However, NRCP 55(b)(2) only applies to cases where the party
17 or their representative has made an appearance. Chalese made no
18 appearance in the case nor did her counsel prior to the default being
19 obtained as Mr. Schneider made it clear at all times prior to filing his
20 motion to set aside the default that he was not retained by Chalese.

21 ///

1 **B. The Parties Should be Awarded Joint Legal Custody**
2 **and Adam Primary Physical Custody of the Children**
3 **as Chalese Must Address the Numerous Fitness**
4 **Issues that Exist**

5 NRS 125C.0035 requires that the sole consideration of the court be
6 the best interest of the child when determining the custody of a minor
7 child. The Supreme Court has held consistently that “[i]n custody
8 matters, the polestar for judicial decision is the best interest of the
9 child.” *Schwartz v. Schwartz*, 107 Nev. 378, 382, 812 P.2d 1268, 1272
10 (1991). The Court’s utmost consideration should always be the welfare
11 of the children. *Culbertson v. Culbertson*, 91 Nev. 230, 533 P.2d 768
12 (1975). The foundation of all custody determinations lies in the
13 particular facts and circumstance of each case. *Arnold v. Arnold*, 95
14 Nev. 951, 604 P.2d 109 (1979). Further, Nevada statutes and case law
15 provide district courts with broad discretion concerning child custody
16 matters. *See generally* NRS 125.510; *Culbertson v. Culbertson*, 91 Nev.
17 230, 533 P.2d 768 (1975). When determining a child’s best interests, the
18 factors set forth in NRS 125C.0035(4) must be considered. Such an
19 analysis in this matter makes it clear Adam should be awarded primary
20 physical custody.

21 ///

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1 a. The wishes of the child if the child is of sufficient age and
2 capacity to form an intelligent preference as to his or her
3 custody.

4 The children are three and one years of age. As such, they lack the
5 appropriate age and maturity to determine where they wish to live.

6 b. Any nomination by a parent or a guardian for the child.

7 This factor is not applicable.

8 c. Which parent is more likely to allow the child to have frequent
9 associations and a continuing relationship with the
10 noncustodial parent

11 Chalese has already attempted to use the children as a shield in
12 barring Adam from having them unless he agreed never to address her
13 fitness issues. Such a reprehensible position is not only contradictory to
14 the children's best interest but proves Chalese cannot be trusted to
15 facilitate Adam's relationship with the young children. Adam, on the
16 other hand, is willing to provide Chalese regular time with the children –
17 something he has done since October 2018. However, said time should
18 be supervised if and until Chalese's fitness issues are addressed.

19 d. Level of Conflict Between the Parents

20 Based on her actual deprivation of Adam's time with his children,
21 Chalese is allowing her emotions and desire to cover up her faults to the
detriment of the minor children. Adam, however, is willing to remain
level headed and focus on the care and protection of the children.

1 e. The Ability of the Parents to Cooperate to Meet the Needs of the
2 Children

3 Adam is fully committed to co-parenting with Chalese but that is
4 almost impossible to do when Chalese insists on unilaterally making
5 decisions regarding the children's welfare. Chalese is the one who,
6 despite admitted marijuana use and now massive consumption of
7 alcohol, refuses to discuss how such consumption hinders her ability to
8 care for the three-year-old and one-year-old. Chalese is the one who
9 moved strangers into the parties' house and living with the children
10 without first obtaining Adam's consent or even discussing same. Chalese
11 is the one who insists on invasive medical procedures for Michael
12 requiring anesthesia without actually discussing same with Adam and
13 against the child's doctor's recommendation. For Chalese, her priority is
14 what she wants when she wants in regards to the children with no
15 respect for Adam's right to co-parent.

16 f. Mental and Physical Health of Parents

17 Adam is a stable individual in good mental and physical health.
18 Chalese, however, has spiraled into consistent use of marijuana and
19 alcohol. Chalese's only defense is that she supposedly uses these drugs
20 and consumes alcohol after the children go to bed but it is clear to Adam
21 upon arriving at the house one day to pick up the children that the bong

1 had just been used and the empty beer case had not been in the home
2 the last time Adam dropped off the children. It is beyond refute that a
3 parent caring for a three and one year old must always be able to care for
4 them on a moment's notice and cannot be in any way under the
5 influence of drugs or alcohol when they do.

6 This use of drugs has also affected Chalese's ability to provide a
7 sanitary home fit for toddlers. Instead, the home is constantly dirty and
8 unkept. Included in this – and more concerning – is the fact that Chalese
9 leaves out drug paraphernalia in reach of where the young toddlers can
10 get them. Chalese also has people who are strangers living with the
11 parties' children, with the strangers move in exasperating Chalese's use
12 drugs and abuse of alcohol. Hence, Chalese's judgment is in serious
13 question and therefore cannot be relied on.

14 g. The Physical, Developmental and Emotional Needs of the
15 Children

16 The children need stability in their lives, as well as fit parents.
17 Chalese's admitted drug use – which she does while she has the children
18 – in addition to massive consumption of alcohol, is a threat to the
19 children's physical safety and is of paramount concern.

20 ///

21 ///

1 h. The Nature of the Relationship of the Child with Each Parent

2 Both children are bonded to their parents. However, Chalese's
3 bond with the children is being jeopardized by her reckless conduct and
4 detrimental personal issues.

5 i. Ability of Child to Maintain a Relationship with Sibling

6 This factor is not applicable.

7 j. Any history of parental abuse or neglect of the child or a sibling
8 of the child

9 While there has not been traditional neglect by Chalese, her
10 current behavior and consumption of alcohol and drugs while caring for
11 the children, in Adam's opinion, arises to neglect.

12 k. Whether either parent has engaged in acts of domestic violence
13 against the children, a parent or any other person

14 This factor is not applicable.

15 l. Whether either parent or any other person seeking custody has
16 committed any act of abduction against the child or any other
17 child.

18 This factor is not applicable.

19 Therefore, and from the facts set forth herein, it should be clear to
20 the Court Adam must be awarded primary physical custody, with
21 Chalese having supervised visitation, pending the following:

(1) Chalese stop using marijuana and consuming alcohol;

(2) Chalese undergoing drug testing via Patch Program;

- 1 (3) Chalese undergoing addiction counseling;
2 (4) Chalese undergoing an alcohol assessment;
3 (5) Chalese taking and completing UNLV's Cooperative Parenting
4 After Divorce course; and
5 (6) Any additional relief the Court deems necessary or prudent.

6 Until that time, Chalese's supervised visitation should consist of
7 every other weekend during the day and on Wednesday evenings. This
8 may seem harsh in Chalese's opinion but this is not about what is
9 convenient for Chalese. Rather, it is about the absolute safety and
10 welfare of a three-year-old and one year old and anyone who thinks its
11 ok to regularly be stoned or drunk while toddlers sleep is inherently
12 unfit and incapable of looking out for the little children's best interests.

13 **C. FMC Mediation**

14 Adam is not opposed to mediation but he cannot agree to the
15 postponement of temporary orders while a month or two pass as
16 mediation is attempted. This is authorized under EDCR 5.303.

17 **D. Child Support**

18 In Nevada and under NRS 125B.070(1)(a), it was determined that
19 25% of the non-custodial parent's income should be paid as and for the
20 financial contribution for two children, subject to the applicable
21

1 presumptive maximum. Chalese should be ordered to pay child support
2 to Adam as he should be awarded primary physical custody.

3 As for income available to Chalese, this is a short-term marriage
4 and Chalese needs to start looking at obtaining employment to assist
5 with the payment of the children's expenses, as well as her own support
6 post-divorce. Chalese, based on her prior work history, is capable of
7 obtaining employment that pays her at least \$3,500 per month. Further,
8 the court should also impute to Chalese rental income from the man and
9 woman living in the marital residence. Being that the man has a child,
10 rent should be set at no less than \$1,025 per month each.¹⁶ This amount
11 is based on average rent collected in Las Vegas.¹⁷

12 With \$4,500 in income, child support would be set at around
13 \$1,125. However, in an effort to be generous, Adam would agree for the
14 present to Chalese paying the statutory minimum of \$100 per month per
15 child for a month while Chalese starts to collect rental income and
16 obtains employment. Further, the parties should, on a temporary basis,
17 each be 1/2 responsible for the costs of daycare and the children's portion
18 of the health insurance premiums, with the parties dividing any
19 unreimbursed/uncovered medical costs for the children pursuant to the

20 ¹⁶ Which consists of costs related to the marital residence, including mortgage
21 cost, share of utilities, sewage, HOA, HOI, etc.

¹⁷ See the online report, attached as **Exhibit 12**.

1 30/30 Rule.

2 **E. Payment of Monthly Expenses**

3 NRS 125.040 states in relevant part:

4 **Orders for support and cost of suit during pendency
of action.**

5 1. In any suit for divorce the court may, in its discretion,
6 upon application by either party and notice to the other party,
7 require either party to pay moneys necessary to assist the other
party in accomplishing one or more of the following:

8 (a) To provide temporary maintenance for the other party;...

9 It is well settled in the Courts of Nevada that temporary spousal
10 support is generally based on the need of the applicant. Such orders for
11 support are at the discretion of the Court. *See Carr-Bricken v. First*
12 *Interstate Bank*, 105 Nev. 402, 915 P.2d 254 (1996). "Maintenance" of
13 the requesting party is the key term in NRS 125.040(a). Also an
14 essential part of this analysis is whether the applicant can work and
whether her expenses are reasonable.

15 Under NRS 125.040, spousal support is about monies needed for
16 maintenance of monthly expenses. This is especially true in short-term
17 marriages, like the brief six-year marriage in this case. In this case,
18 Chalese lists her monthly expenses as \$1,800. Chalese immediately has
19 \$1,000 available to her in the form of rental income from the two rooms
20 for Josh and his son, who is currently living rent free in the marital
21 residence and there is no reason Adam should be forced to subsidize

1 these strangers and their children. Hence, Chalese should be responsible
2 for the mortgage and other bills related to the marital residence, any
3 credit card payments, groceries, car expenses, pets and her discretionary
4 expenses.

5 However, Chalese should also immediately start looking for and
6 obtain employment (with Chalese providing proof of all efforts she
7 makes on a bi-monthly basis to Adam's counsel). There is no reason
8 Chalese should not be able to do so within a month or two and Adam will
9 temporarily agree to cover the set monthly bills not listed on Chalese's
10 FDF (i.e. utilities, car insurance, cell phone, etc.), until she does.

11 **F. Vocational Assessment**

12 If Chalese refuses to find employment at least in the \$3,500 per
13 month range, than she should be ordered to participate in a vocational
14 assessment.

15 **G. The JPI Should be Enforced and the Artwork in the**
16 **Highland View Avenue Residence Should be Placed**
in Adam's Care

17 NRS 125.050 states:

18 **Preliminary orders concerning property or pecuniary**
19 **interests.** If, after the filing of the complaint, it is made to appear
20 probable to the court that either party is about to do any act that
21 would defeat or render less effectual any order which the court
might ultimately make concerning the property or pecuniary
interests, the court shall make such restraining order or other

1 order as appears necessary to prevent the act or conduct and
2 preserve the status quo pending final determination of the cause.

3 Chalese has unilaterally authorized her live-in fiancé Josh to sell
4 community property without Adam's consent. While Adam does not
5 know if any of the property listed on Josh's Facebook posts has been
6 sold, this Court should immediately admonish Chalese not to do so. The
7 Court should also allow Adam to take possession of the artwork in the
8 Highland View residence collected by Adam and safeguard same during
9 the pendency of the divorce in accordance with NRS 125.050. Chalese
10 must also disclose what, if anything, has been sold and for how much.

11 **H. Chalese is Not Entitled to Attorney's Fees**

12 Based on information and belief, Chalese's counsel has taken the
13 case on a contingency basis. Mr. Schneider has accepted family law cases
14 on such a basis before and has in this matter, as evidenced by the fact
15 Chalese's FDF states Mr. Schneider has not been paid anything nor is he
16 owed any amount of money – despite the obvious fact he has done work
17 on the case. Therefore, an award of fees is not a ripe for adjudication. If
18 this is disputed, Mr. Schneider should provide his retainer agreement
19 and billing statements.

20 Further, Chalese unilaterally removed \$7,500 from the parties'
21 joint account and has not accounted for what she did with the funds. She

1 can apply them to any fees she needs and if the funds were used to buy
2 her and Josh engagement rings, it is waste and she can sell them and
3 apply them to any fees.

4 **III. CONCLUSION**

5 Based on the foregoing, and in addition to this Honorable Court
6 denying the relief in Chalese's Motion, the Court should grant the relief
7 requested in Adam's Countermotion in its entirety, including:

8 (1) Awarding Adam primary physical custody and Chalese
9 supervised visitation every other weekend during the day and on
10 Wednesday evenings, pending the following:

- 11 (A) Chalese stop using marijuana and consuming alcohol;
- 12 (B) Chalese undergoing drug testing via the Patch Program;
- 13 (C) Chalese undergoing addiction counseling;
- 14 (D) Chalese undergoing an alcohol assessment;
- 15 (E) Chalese taking and completing UNLV's Cooperative
16 Parenting After Divorce course; and
- 17 (F) Any additional relief the Court deems necessary or
18 prudent.

19 (2) Ordering FMC mediation after implementation of the above
20 temporary schedule and requirements;

21

- 1 (3) Awarding child support to Adam in the amount of \$100 per
2 month per child pending Chalese obtaining employment;
3 (4) Imputing income to Chalese of \$4,500 and ordering her to
4 pay certain expenses;
5 (5) Ordering a vocation assessment;
6 (6) Ordering the sale of the Highland View residence; and
7 (7) Ordering any other related relief.

8 Dated Tuesday, February 26, 2019.

9 Respectfully Submitted,

10 THE ABRAMS & MAYO LAW FIRM

11 /s/ Vincent Mayo, Esq.

12 Vincent Mayo, Esq.

13 Nevada State Bar Number: 8564

14 6252 South Rainbow Blvd., Suite 100

15 Las Vegas, Nevada 89118

16 Attorney for Plaintiff
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1. I, ADAM SOLINGER, do solemnly swear to testify herein to the truth, the whole truth and nothing but the truth.

2. I am the Plaintiff in the above-entitled action, and above the age of majority and am competent to testify to the facts contained in this affidavit.

3. I make this affidavit in support of the foregoing *Opposition and Countermotion*.

4. I have read said *Opposition and Countermotion* and hereby certify that the facts set forth in the Points and Authorities attached thereto are true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true. I incorporate said facts into this Affidavit as though fully set forth herein.

FURTHER, AFFIANT SAYETH NAUGHT.

RIGHT.



ADAM SOLINGER

SUBSCRIBED AND SWORN to before
me this 26 day of February, 2019.

NOTARY PUBLIC



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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *OPPOSITION TO AMENDED
MOTION TO SET ASIDE DEFAULT; FOR EXCLUSIVE POSSESSION
OF THE MARITAL RESIDENCE AND ORDERING PLAINTIFF TO
ASSIST IN MAKING MORTGAGE PAYMENTS; FOR MEDICAL LEGAL
CUSTODY OF THE MINOR CHILDREN; FOR AN ORDER REFERRING
THE PARTIES TO MEDIATION PURSUANT TO DECRY 5.70, FOR AN
ORDER AWARDING PLAINTIFF CHILD SUPPORT; FOR AN ORDER
AWARDING DEFENDANT ALIMONY; AND FOR ATTORNEY'S FEES
AND COSTS PRIMARY PHYSICAL CUSTODY, CHILD SUPPORT, AND
ATTORNEY'S FEES AND COSTS AND COUNTERMOTION FOR JOINT
LEGAL CUSTODY; PRIMARY PHYSICAL CUSTODY TO PLAINTIFF
AND SUPERVISED VISITATION TO DEFENDANT; TO ESTABLISH
CHILD SUPPORT; TO ESTABLISH PAYMENT OF MARITAL
EXPENSES; FOR AN ORDER PROTECTING THE PARTIES'
COMMUNITY PROPERTY; DEFENDANT TO OBTAIN EMPLOYMENT
AND TO COOPERATE IN A VOCATIONAL ASSESSMENT* was filed
electronically with the Eighth Judicial District Court in the above-
entitled matter, on Tuesday, February 26, 2019. Electronic service of the
foregoing document shall be made in accordance with the Master Service
///

1 List, pursuant to NEFCR 9, as follows:

2 Louis Schneider, Esq.
3 Attorney for Defendant

4 /s/ David J. Schoen, IV, ACP
5 An Employee of The Abrams & Mayo Law Firm

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MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

ADAM MICHAEL SOLINGER
Plaintiff/Petitioner

v.
CHALESE MARIE SOLINGER
Defendant/Respondent

Case No. D-19-582245-D

Dept. I

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

Notice: Motions and Oppositions filed after entry of a final order issued pursuant to NRS 125, 125B or 125C are subject to the reopen filing fee of \$25, unless specifically excluded by NRS 19.0312. Additionally, Motions and Oppositions filed in cases initiated by joint petition may be subject to an additional filing fee of \$129 or \$57 in accordance with Senate Bill 388 of the 2015 Legislative Session.

Step 1. Select either the \$25 or \$0 filing fee in the box below.

- ☐ **\$25** The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
-OR-
☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
☒ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
☐ The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on _____.
☐ Other Excluded Motion (must specify) _____.

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

- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
☒ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
☐ The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
-OR-
☐ **\$129** The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.
-OR-
☐ **\$57** The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

Step 3. Add the filing fees from Step 1 and Step 2.

The total filing fee for the motion/opposition I am filing with this form is:

☒ \$0 ☐ \$25 ☐ \$57 ☐ \$82 ☐ \$129 ☐ \$154

Party filing Motion/Opposition: Plaintiff/Petitioner Date 02/26/2019

Signature of Party or Preparer





1 **EXH**

2 Vincent Mayo, Esq.
3 Nevada State Bar Number: 8564
4 THE ABRAMS & MAYO LAW FIRM
5 6252 South Rainbow Blvd., Suite 100
6 Las Vegas, Nevada 89118
7 Tel: (702) 222-4021
8 Fax: (702) 248-9750
9 Email: VMGroup@theabramslawfirm.com
10 Attorney for Plaintiff

11 Eighth Judicial District Court
12 Family Division
13 Clark County, Nevada

14 ADAM MICHAEL SOLINGER,)	Case No.: D-19-582245-D
)	
15 Plaintiff,)	Department: I
)	
16 vs.)	
)	Date of Hearing: March 5, 2019
17 CHALESE MARIE SOLINGER,)	Time of Hearing: 3:30 p.m.
)	
18 Defendant.)	

19 **APPENDIX OF EXHIBITS TO PLAINTIFF'S**
20 **OPPOSITION TO AMENDED MOTION TO SET ASIDE**
21 **DEFAULT; FOR EXCLUSIVE POSSESSION OF THE MARITAL**
RESIDENCE AND ORDERING PLAINTIFF TO ASSIST IN
MAKING MORTGAGE PAYMENTS; FOR MEDICAL LEGAL
CUSTODY OF THE MINOR CHILDREN; FOR AN ORDER
REFERRING THE PARTIES TO MEDIATION PURSUANT TO
EDCR 5.70, FOR AN ORDER AWARDED PLAINTIFF CHILD
SUPPORT; FOR AN ORDER AWARDED DEFENDANT
ALIMONY; AND FOR ATTORNEY'S FEES AND COSTS
PRIMARY PHYSICAL CUSTODY, CHILD SUPPORT, AND
ATTORNEY'S FEES AND COSTS AND
COUNTERMOTION FOR JOINT LEGAL CUSTODY; PRIMARY
PHYSICAL CUSTODY TO PLAINTIFF AND SUPERVISED
VISITATION TO DEFENDANT; TO ESTABLISH CHILD
SUPPORT; TO ESTABLISH PAYMENT OF MARITAL
EXPENSES; FOR AN ORDER PROTECTING THE PARTIES'

1 **COMMUNITY PROPERTY; DEFENDANT TO OBTAIN**
2 **EMPLOYMENT AND TO COOPERATE IN A VOCATIONAL**
3 **ASSESSMENT**

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Exhibit	Description
1	Gregory Cooper's obituary
2	Text messages between the parties re: funeral
3	Photographs of marital residence
4	Photographs of the bong, the photos of the lighters, grains of pot and tool used to clean out the bong filter, lighters and grains of pot still lying around
5	Text message from Chalese
6	Photograph of Chalese's purse filled with beer
7	Photograph of Chalese and Josh, with Chalese wearing a diamond ring
8	Facebook post regarding Josh's ring
9	Facebook post wherein Josh lists community property for sale
10	February 22, 2019 correspondence
11	Photographs of the art collection
12	Rental trends report for Las Vegas

15 Dated Tuesday, February 26, 2019.

16 Respectfully Submitted,

17 THE ABRAMS & MAYO LAW FIRM

18

19 /s/ Vincent Mayo, Esq.
20 Vincent Mayo, Esq.
21 Nevada State Bar Number: 8564
 6252 South Rainbow Blvd., Suite 100
 Las Vegas, Nevada 89118
 Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *APPENDIX OF EXHIBITS TO PLAINTIFF’S OPPOSITION TO AMENDED MOTION TO SET ASIDE DEFAULT; FOR EXCLUSIVE POSSESSION OF THE MARITAL RESIDENCE AND ORDERING PLAINTIFF TO ASSIST IN MAKING MORTGAGE PAYMENTS; FOR MEDICAL LEGAL CUSTODY OF THE MINOR CHILDREN; FOR AN ORDER REFERRING THE PARTIES TO MEDIATION PURSUANT TO DECRY 5.70, FOR AN ORDER AWARDING PLAINTIFF CHILD SUPPORT; FOR AN ORDER AWARDING DEFENDANT ALIMONY; AND FOR ATTORNEY’S FEES AND COSTS PRIMARY PHYSICAL CUSTODY, CHILD SUPPORT, AND ATTORNEY’S FEES AND COSTS AND COUNTERMOTION FOR JOINT LEGAL CUSTODY; PRIMARY PHYSICAL CUSTODY TO PLAINTIFF AND SUPERVISED VISITATION TO DEFENDANT; TO ESTABLISH CHILD SUPPORT; TO ESTABLISH PAYMENT OF MARITAL EXPENSES; FOR AN ORDER PROTECTING THE PARTIES’ COMMUNITY PROPERTY; DEFENDANT TO OBTAIN EMPLOYMENT AND TO COOPERATE IN A VOCATIONAL ASSESSMENT* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Tuesday, February 26, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service

1 List, pursuant to NEFCR 9, as follows:

2 Louis Schneider, Esq.
3 Attorney for Defendant

4
5 /s/ David J. Schoen, IV, ACP
6 An Employee of The Abrams & Mayo Law Firm

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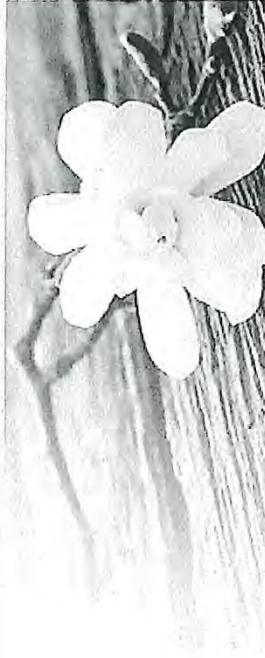
EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

Obituaries

Gregory L. Cooper
September 20, 1930 - June 13, 2018

[Tribute Wall](#)[Obituary & Events](#)[Photos & Videos](#)[Login](#)

Obituary for Gregory L. Cooper

CMSgt (Ret) Gregory L Cooper Jr passed away on June 13 in Santa Maria, California. Greg was born on September 20, 1930 in Muskegon, MI, then raised on a Depression-era farm in Austin, MN, where he loved to play sports, grow vegetables, fishing, build things and wanted to travel the world.



Share:



Send Flowers

(<https://dudleyhoffman-mortuary-crematory-memory-gardens.tributecenterstore.com?old=3119392&tag=&ph=1>)

Share a Memory

Greg joined the Air Force in 1947 and was assigned as a medic at Furstenfeldbruck Air Base, Germany. Throughout his Air Force career, Greg bowled, played softball, basketball and football helping his teams win several base and Regional tournaments. In Bavaria, he saw Erika at an Air Force dance, they married in 1952 and the Cooper's moved to Griffiss AFB, NY to be discharged. They moved back to Austin, MN but he missed the military, so he re-enlisted. In 1953, Greg and Erika were transferred to Offutt AFB, NB, where daughter Dianne was born then in 1955, they moved to Wiesbaden AB, Germany, where son Danny was born. In 1960, he was assigned to Lowry AFB, CO to learn electronics then to Travis AFB, CA to work on missiles then earned his high school diploma and Electronics Technician degree. In 1963, Greg and friend Len Wink, won the California State Doubles bowling title vs future Hall of Famer Billy Hardwick. In 1965, he was sent to Koperat AB, Thailand to support the Vietnam War, then a year later to Hahn AB, Germany to work on munitions and bowled on the base team traveling across Germany. In 1970, Greg was sent to Minot AFB, ND to help fix Minuteman nuclear missiles and in 1974, to Vandenberg AFB, CA, to refurbish missile launch silos.

In 1978, he retired from the Air Force then moved to Orcutt where he bowled Oak Knolls Lanes first 300 game in 1979. From 1984 to 1986, he worked for Martin Marietta on the Space Shuttle Launch complex. In 1988, the Cooper's moved to Nipomo, designed their new home and bowled at Rancho Bowl in Santa Maria, where he volunteered to give free bowling lessons.

Greg and Erika's greatest achievements are Dianne and Danny. Dianne was an Air Force doctor with husband Mike and Danny was an Air Force Engineer. With Erika's 30 year of Air Force Civil Service, the Cooper family has 88 years of Air Force service.

In 2017, he fulfilled his dream for education by creating a Santa Barbara bowling scholarship. The 2017 winner was a Santa Barbara County bowler now in her junior year at the Stanford University Mechanical Engineering program. The 2018 winner was a competitive County bowler that will attend UCLA and study Electrical Engineering.

Greg's Memorial Service will be held on June 23rd at 1 pm at the Chapel of Dudley-Hoffman Mortuary on 1003 E. Stowell Rd in Santa Maria. Friends can write a check payable to the "Scholarship Foundation of Santa Barbara" and write in the memo line "Greg and Erika Cooper College Bowling Scholarship". Then mail this tax-deductible donation to the Scholarship Foundation of Santa Barbara, PO Box 3620 Santa Barbara, CA 93130. To make a credit card donation, go to sbscholarship.org, click on the "Donate" button

and type the scholarship name in the Name of Scholarship box. If questions, please call the Foundation at 805-687-6065.

Greg is survived by his wife of 66 years Erika, daughter Dianne and husband Michael Solinger of Carson City, NV, Danny Cooper in Cincinnati, OH, granddaughter Lauren Solinger in Reno, NV and grandson Adam Solinger and wife Chalese in Las Vegas, NV, great grandchildren MAQ and Marie. Dad we salute your life of service and love.

To send flowers or a remembrance gift to the family of Gregory L. Cooper, please visit our Tribute Store
(<https://dudleyhoffmanmortuary-crematory-memory-gardens.tributecenterstore.com?obid=3119392&tag=&pb=2>).

Obituaries

© Dudley-Hoffman Mortuary, Crematory & Memory Gardens | Santa Maria, CA - Funeral Home Website Design By [Frazer Consultants, LLC](https://www.frazerconsultants.com/)
(<https://www.frazerconsultants.com/>).

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2

9:17



CA

Chalese >

Is he doing any better?

Yes

How'd he doing?

Same

How are you doing?

I'm going to watch the ranch

Ok honey. I just got to the hotel

I just put maq upstairs and am getting Marie to sleep

What are you doing

I'm on the phone with a da because I'm on call

K. I'll leave you alone

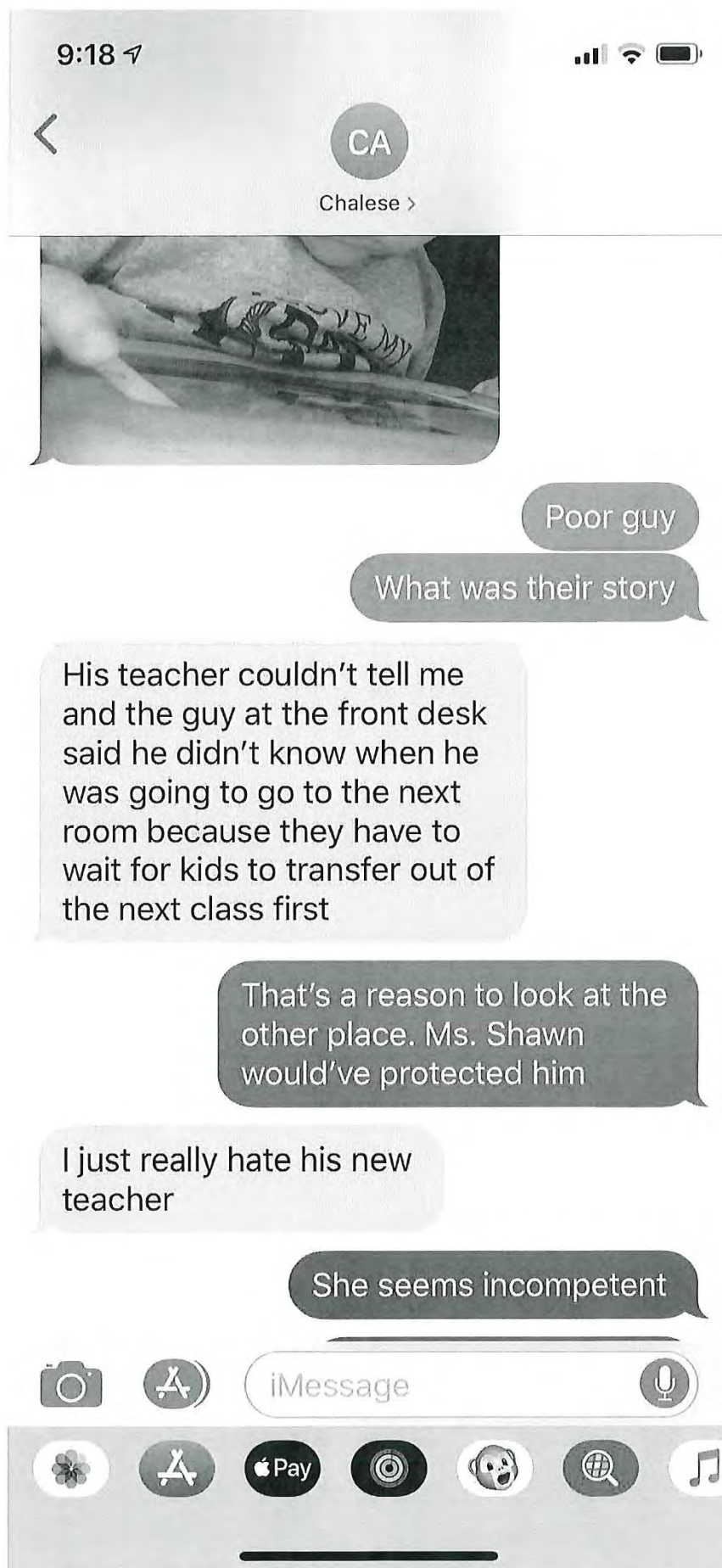
I'm going to bed. Goodnight.



iMessage



000135



9:18 ↵



CA

Chalese >

Landed

How was your flight

Eh not terrible

How's maq

Cranky AF

Is he hurt



iMessage



000137

9:18 ↗



Chalese >

Fri, Jun 22, 4:38 PM

Landed

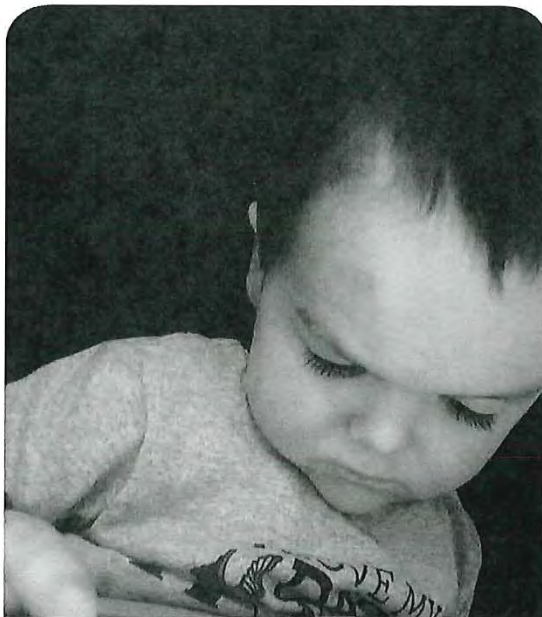
How was your flight

Eh not terrible

How's maq

Cranky AF

Is he hurt



iMessage



Apple Pay



000138

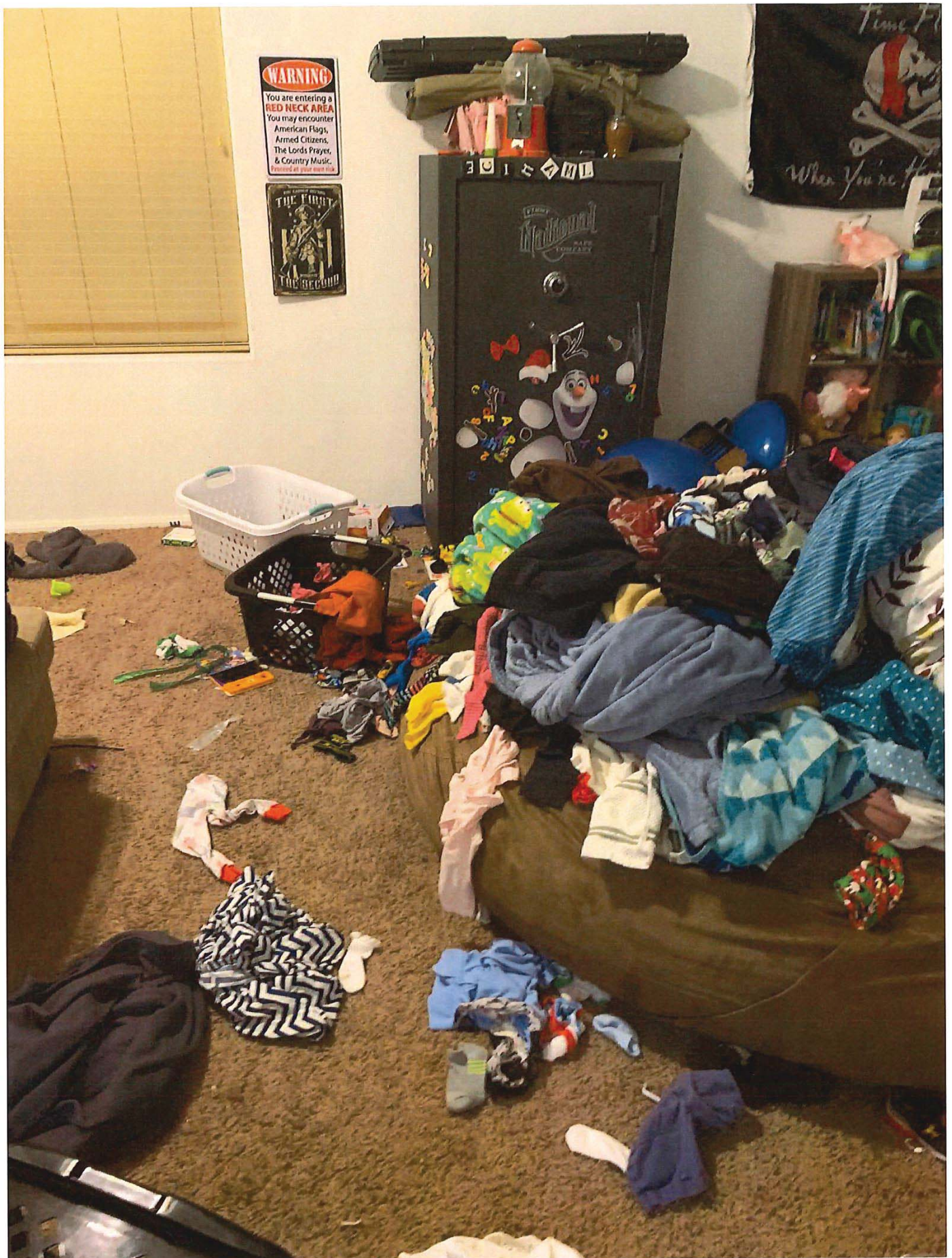
EXHIBIT 3

EXHIBIT 3

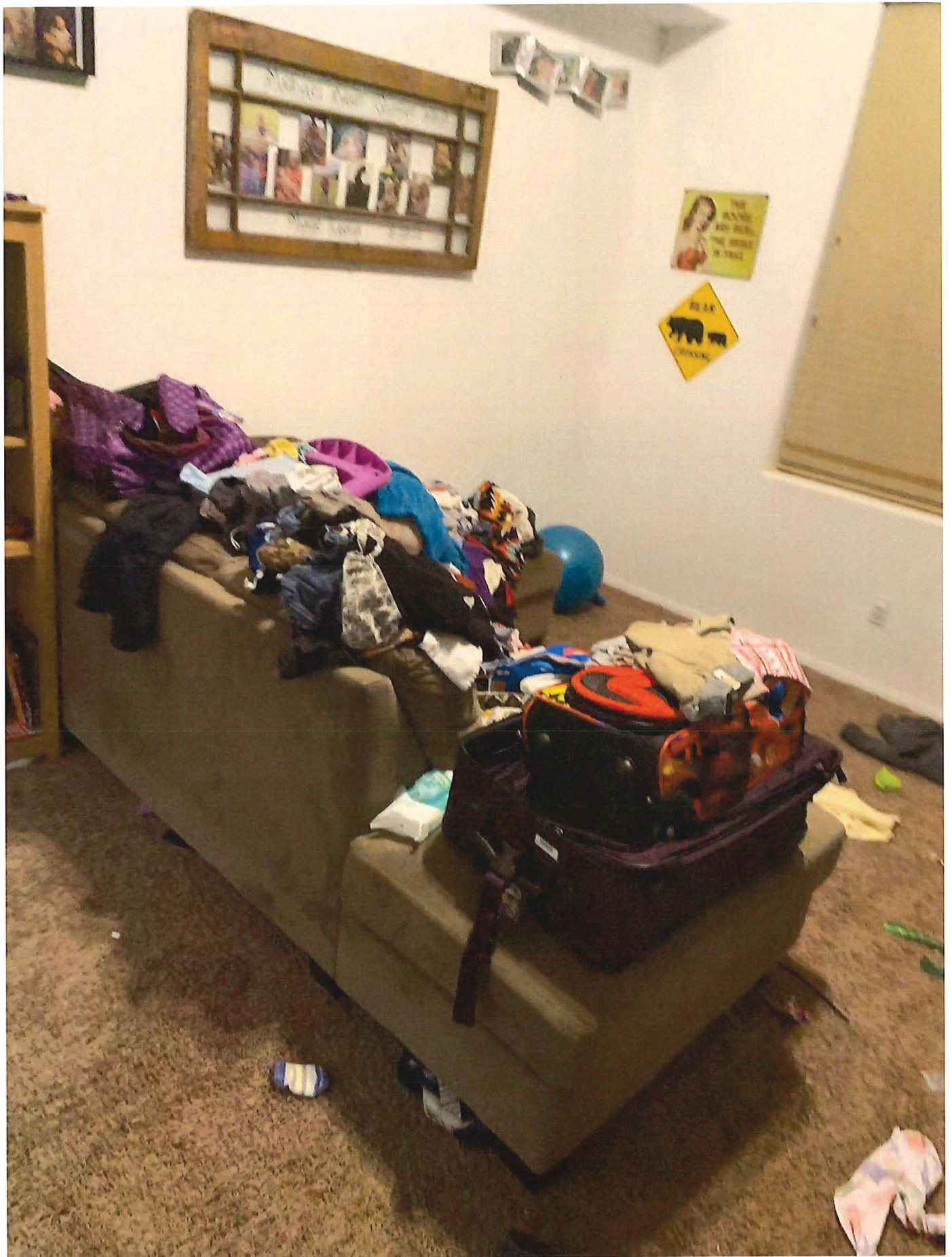
EXHIBIT 3



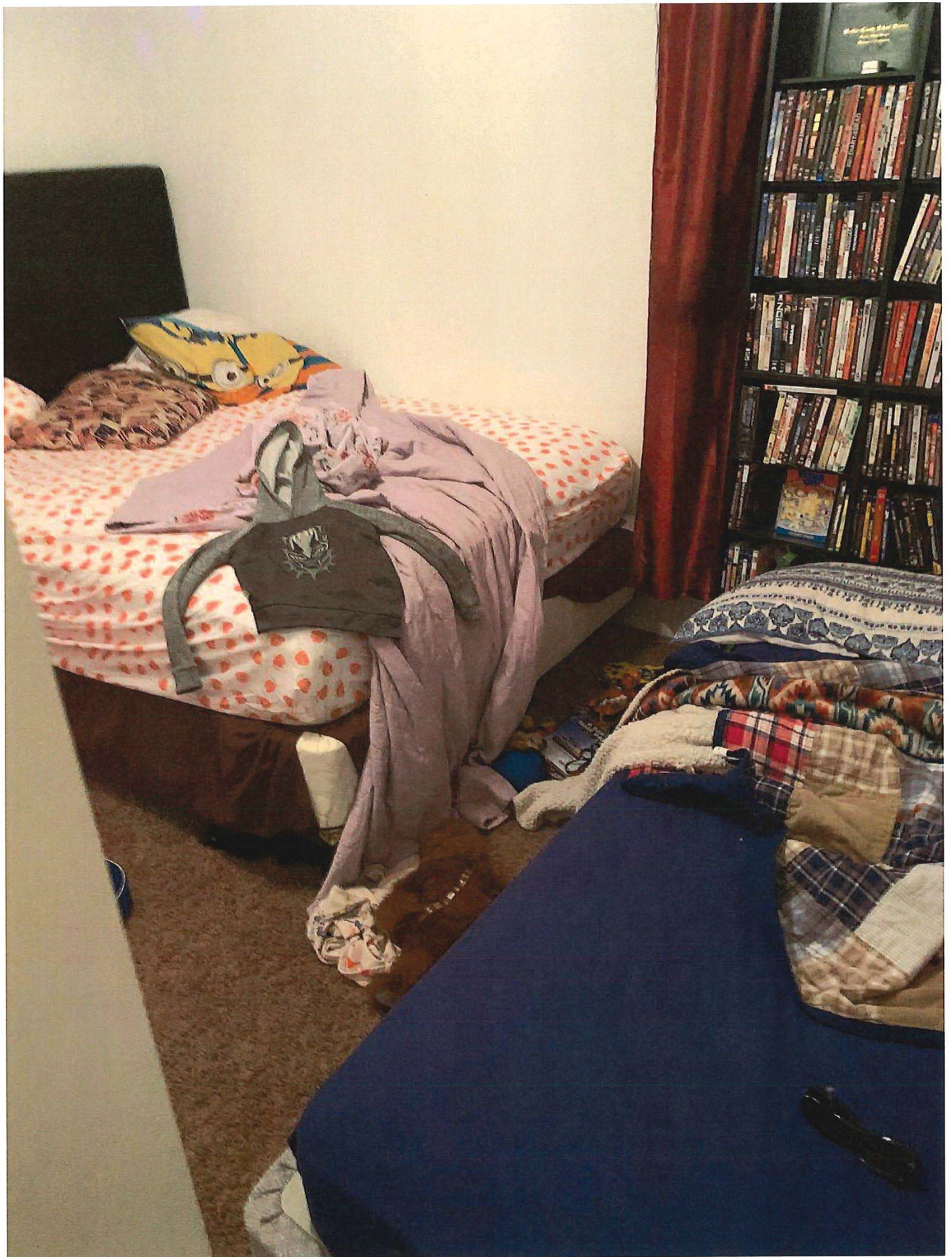
000140



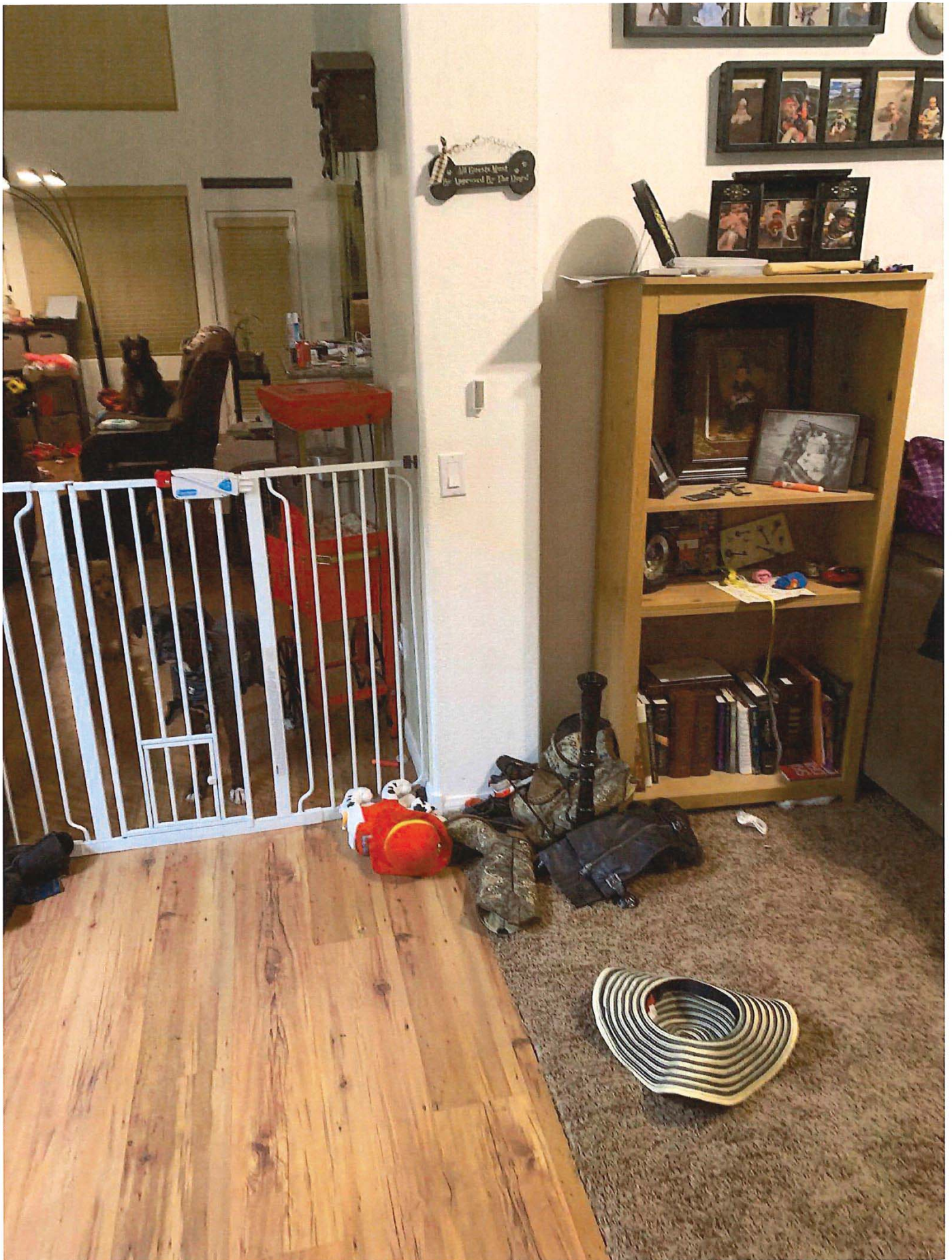
000141



000142



000143



000144

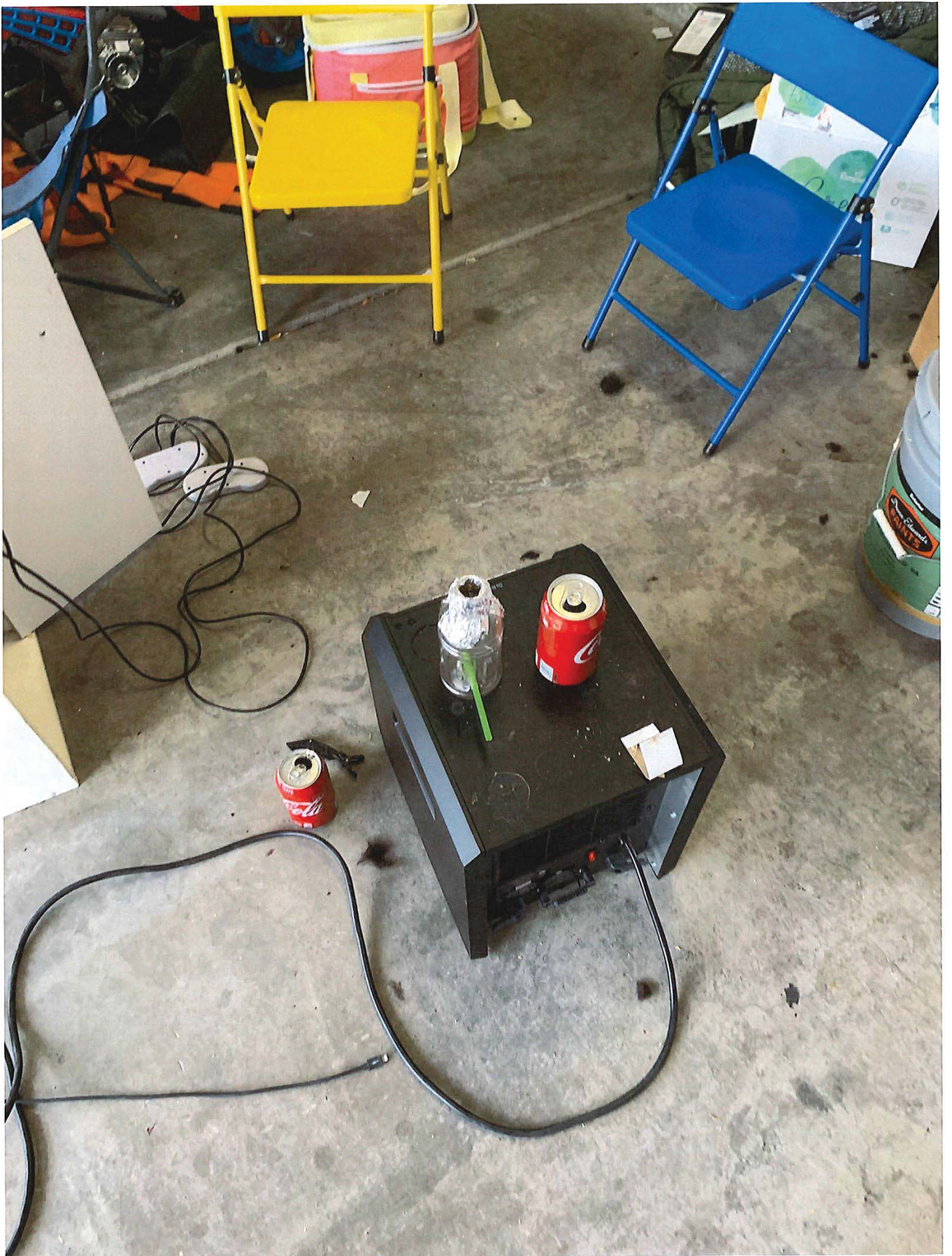


000145

EXHIBIT 4

EXHIBIT 4

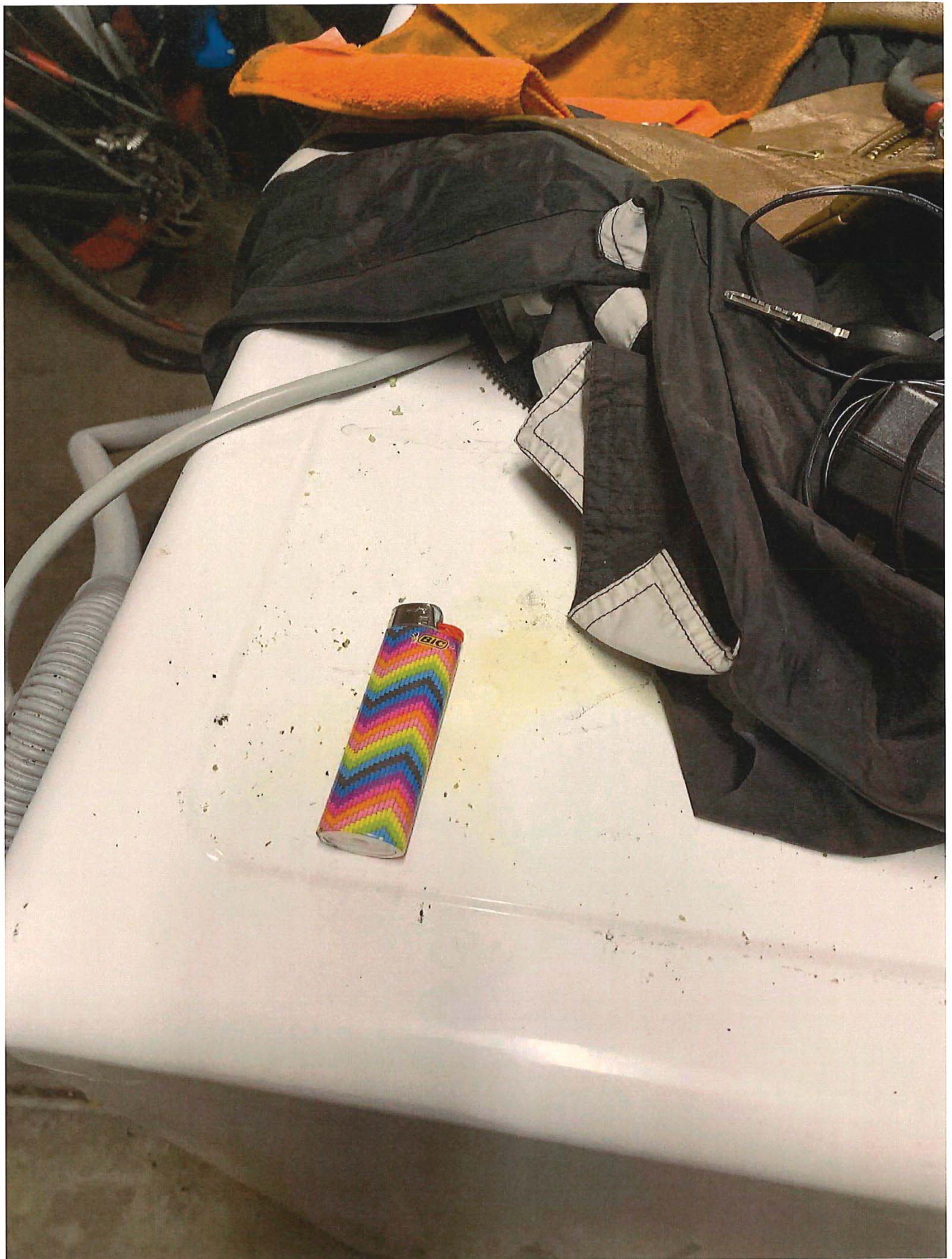
EXHIBIT 4



000147



000148



000149

EXHIBIT 5

EXHIBIT 5

EXHIBIT 5

9:37



Chalese >

How do you want next week to work? Do you want an extra day or two during the week to makeup for his surgery on Friday? Do you still want to take just Marie on your normal days? It's up to you

Seriously? There's no food in the house because I do my grocery shopping when the kids aren't here. We eat the food during the week. They get baths every other night just like they always have and their clothes were fresh out of the dryer. The house might be a little messier than usual but it's not bad. The drug pipe has pot in it and it's not out when the kids are here. Maybe you should stay out of peoples houses that you don't belong in. Don't sit there and threaten me with cps and other legal bullshit.



iMessage



EXHIBIT 6

EXHIBIT 6

EXHIBIT 6



000153

EXHIBIT 7

EXHIBIT 7

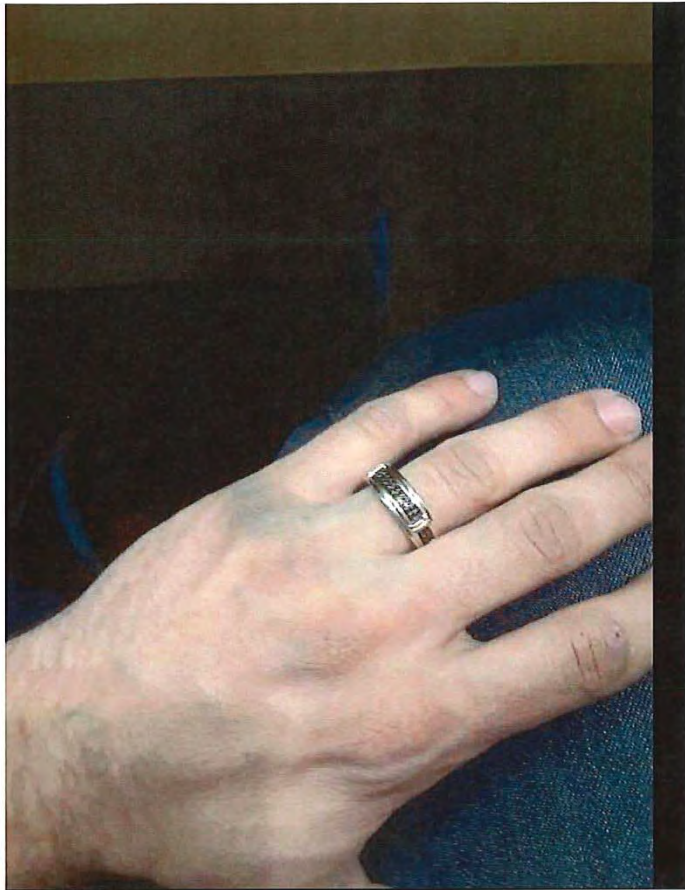
EXHIBIT 7



EXHIBIT 8

EXHIBIT 8

EXHIBIT 8



Josh Lloyd
February 7



Black diamonds white & rose gold — at Jared.

6

1 Comment

Like

Share



Blu Pearce Nice

Like · 1w

EXHIBIT 9

EXHIBIT 9

EXHIBIT 9



Josh Lloyd shared a link.

February 12 at 2:05 PM · OfferUp · 🌐

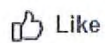


OFFERUP.CO

Samsung washer for Sale in Las Vegas, NV - OfferUp

Used (normal wear), Good condition. Dryer stopped. ended up getting a new...

4 Comments



Like



Share



Adam Gruszecki Why you selling it.

Like · 1w



Josh Lloyd Got a new set

Like · 1w



Adam Gruszecki Josh Lloyd nice.

Like · 1w



Josh Lloyd shared a link.



February 12 at 2:10 PM · OfferUp · 🌐



OFFERUP.CO

Treadmill for Sale in Las Vegas, NV - OfferUp

Used (normal wear), 200 . Make an offer!



Like



Share



Josh Lloyd shared a link.



February 12 at 2:10 PM · OfferUp ·



OFFERUP.CO

Burely bike trailer for Sale in Las Vegas, NV - OfferUp

Used (normal wear), Burely bike trailer almost new. 400 in the store . Make a...



Like

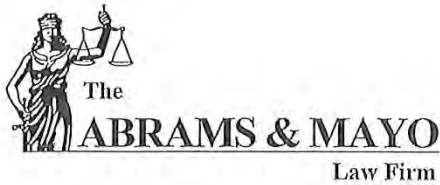


Share

EXHIBIT 10

EXHIBIT 10

EXHIBIT 10



† Jennifer V. Abrams, Esq.
† Vincent Mayo, Esq.

6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
P. 702.222.4021 F. 702.248.9750
www.TheAbramsLawFirm.com

Friday, February 22, 2019

Louis C. Schneider, Esq.
Law Office of Louis C. Schneider
430 South Seventh Street
Las Vegas, Nevada 89101

Re: *Adam M. Solinger v. Chalese M. Solinger*
Case Number: D-19-582245-D

Dear Mr. Schneider:

It has come to our attention that your client and her live-in boyfriend, Joshua Lloyd, have been selling the parties community property online. Please admonish your client and instruct her to immediately stop doing so as is a joint preliminary injunction in place and my client has not authorized her to sell any property. Additionally, please provide information on any and all items that have already been sold or removed from the marital residence, including proof of the funds received.

Thank you for your time and attention to this matter.

Sincerely,

THE ABRAMS & MAYO LAW FIRM



Vincent Mayo, Esq.

cc: Mr. Adam M. Solinger

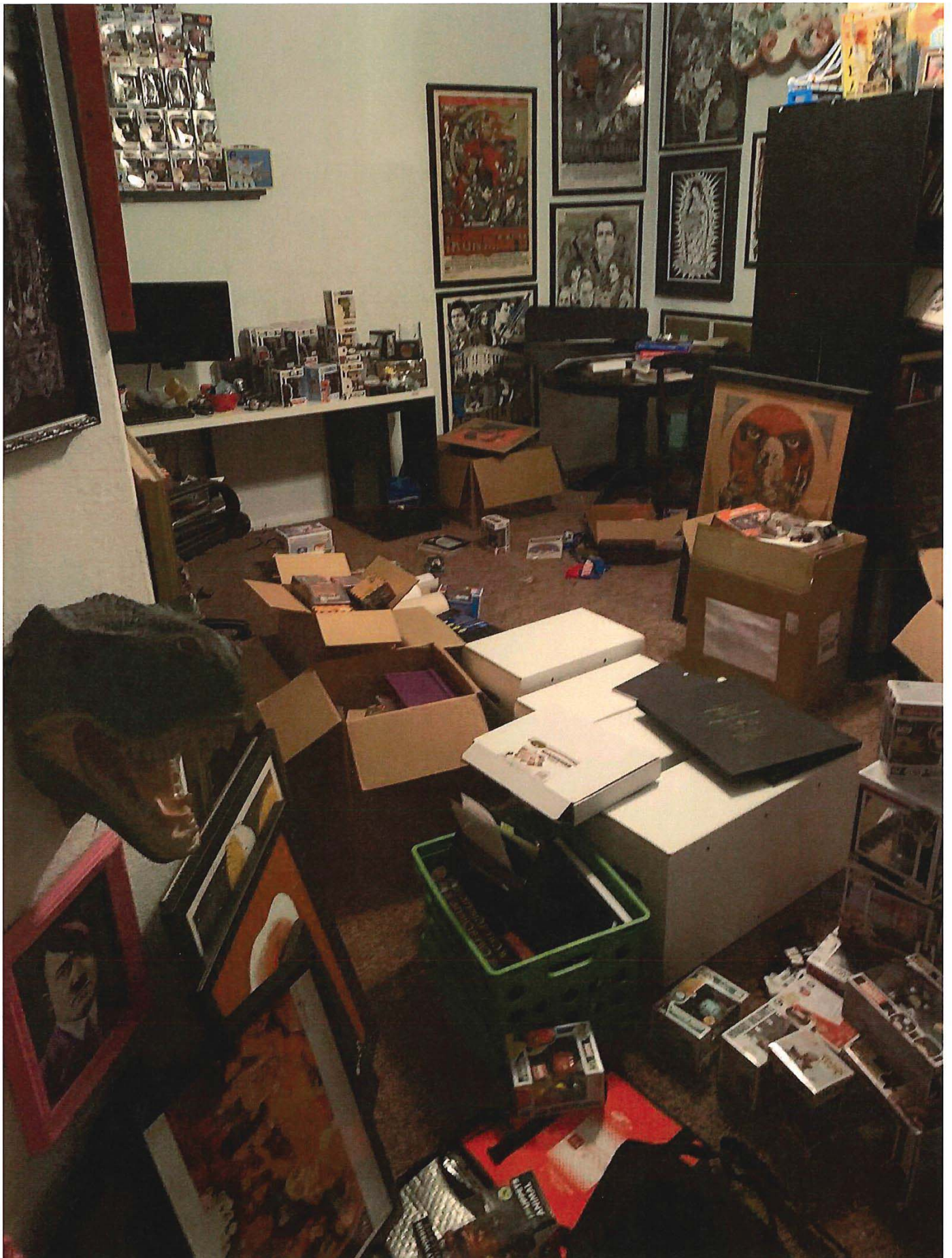
† Board Certified Family Law Specialist

* Fellow of the American Academy of Matrimonial Lawyers; Admitted in Nevada, California, and Louisiana

EXHIBIT 11

EXHIBIT 11

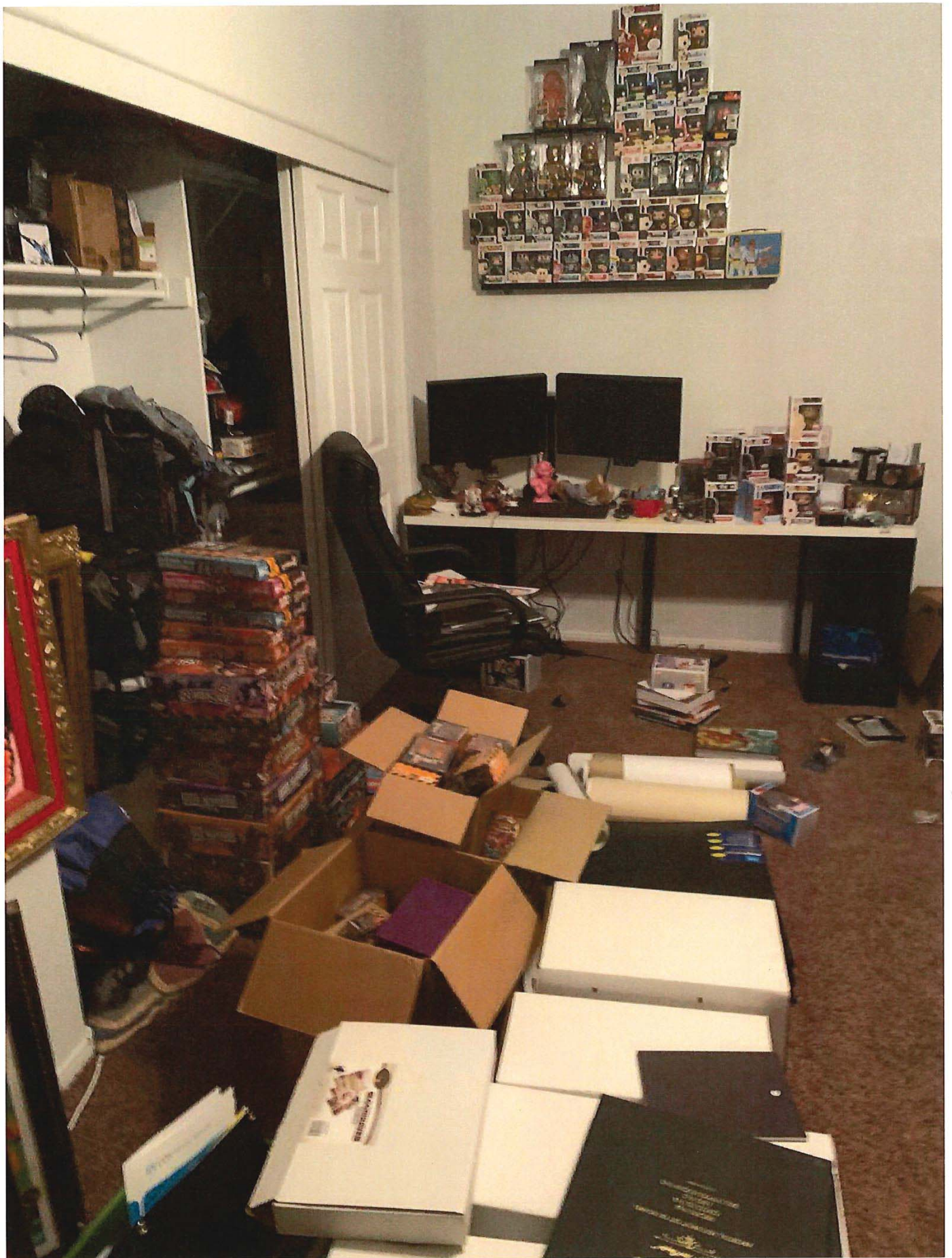
EXHIBIT 11



000165



000166



000167

EXHIBIT 12

EXHIBIT 12

EXHIBIT 12

Las Vegas, NV Rental Market Trends

Highlights

> The average rent for an [apartment in Las Vegas](#) is \$1,025, a 8% increase compared to the previous year, when the average rent was \$952.

Average Rent in Las Vegas, NV

🔄 Last updated Jan 2019

Average Rent	Y-o-Y Change	Average Apartment Size
\$1,025	8%	938 sq. ft.

> The average size for a Las Vegas, NV apartment is 938 square feet, but this number varies greatly depending on apartment type. [Studio apartments](#) are the smallest and most affordable, [1-bedroom apartments](#) are closer to the average, while [2-bedroom apartments](#) and [3-bedroom apartments](#) offer a more generous square footage.

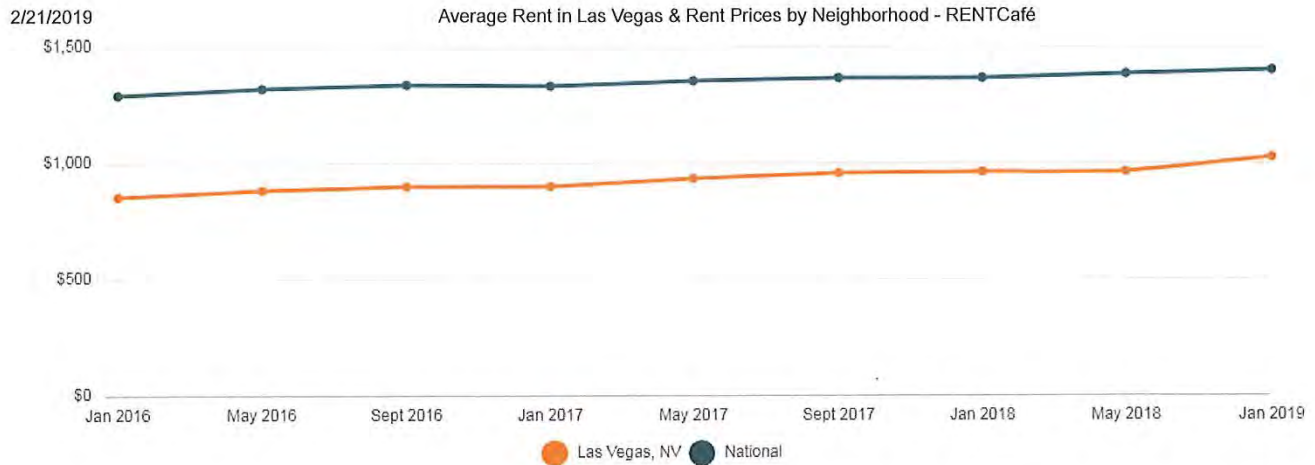
Las Vegas, NV Apartment Rent Ranges

\$501-\$700	10%
\$701-\$1,000	42%
\$1,001-\$1,500	43%
\$1,501-\$2,000	4%
> \$2,000	1%



Las Vegas, NV Rent Trends

Average Rent



[View as table](#) / [View as graph](#)

Access comprehensive **real estate data** and information on Yardi® Matrix

[Learn more](#)

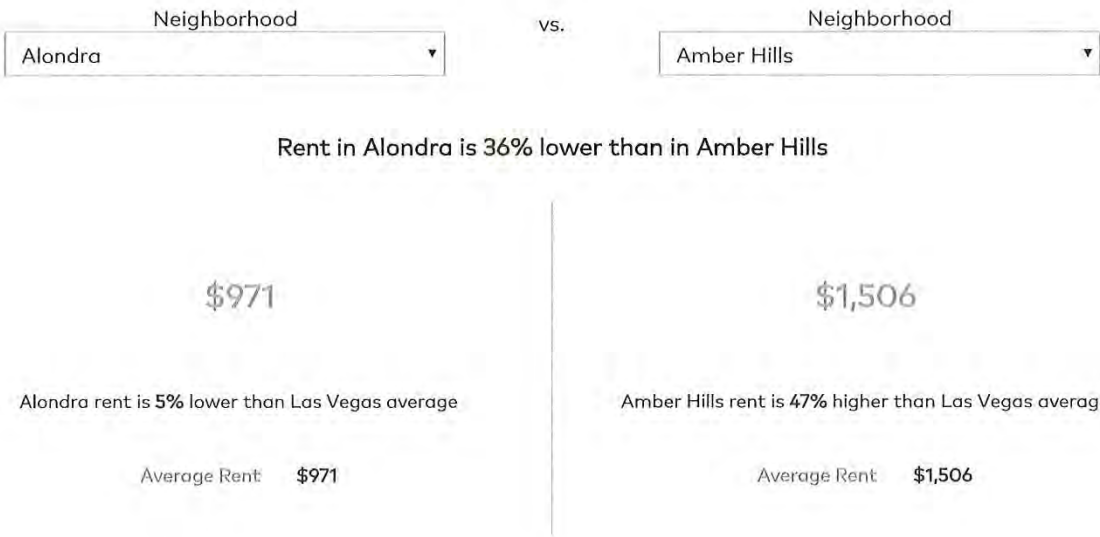
Average Rent in Las Vegas, NV By Neighborhood

Neighborhood	Average Rent
Southridge	\$760
Showboat	\$760
Mayfair	\$760
John S. Park	\$760
Huntridge Park	\$760
Hillside Heights	\$760
Francisco Park	\$760
Crestwood	\$760
Beverly Green	\$760
Stewart Place	\$808
Gateway District	\$835
Arts District	\$837
Valley	\$852
Downtown Las Vegas	\$854

Average Rent	
The Strip	\$861
Westleigh	\$875
Scotch Eighty	\$875
Rancho Sereno	\$875
Quail Estates West	\$875
Meadows Mobile Home Park	\$875
View Top 20 / View All	

- > The most affordable neighborhoods in Las Vegas are [Beverly Green](#), where the average rent goes for \$760/month, [Crestwood](#), where renters pay \$760/mo on average, and Francisco Park, where the average rent goes for \$760/mo. If you're looking for other great deals, check out the listings from [Hillside Heights \(\\$760\)](#), Huntridge Park (\$760), and [John S. Park \(\\$760\)](#), where the asking prices are below the average Las Vegas rent of \$1,025/mo.
- > The most expensive neighborhoods in Las Vegas are [Sun City \(\\$1,601\)](#), [The Hills \(\\$1,601\)](#) and Red Rock (\$1,610).

Las Vegas | Rent Comparison by Neighborhood



How Does Las Vegas Compare to Nearby Cities

	Average Rent	Y-o-Y Change
Las Vegas	\$1,025	8%
North Las Vegas	\$1,049	6%
Henderson	\$1,245	8%

	Average Rent	Y-o-Y Change
Paradise	\$967	8%
Winchester	\$878	9%
Spring Valley	\$1,149	7%
Sunrise Manor	\$873	8%
Whitney	\$967	5%
Enterprise	\$1,085	6%

> For more information about the Las Vegas rental trends, check out our [monthly rent report](#)

Cheapest Listings on RENTCafé

[Ashford Village Apartments](#)
[Stewart Pines Apartments](#)
[Stewart Pines I](#)
[Peppertree Apartments](#)
[Townhome Villas](#)
[Harmon Hills](#)
[Ridge on Charleston](#)
[Harrison Pines](#)
[Ogden Pines](#)
[Village Square](#)

[Sugartree Apartments](#)
[Rancho Alvarado Apartments](#)
[Lake Sahara Apartments](#)
[Hyde Apartments](#)
[Bonanza Pines](#)
[Villas at Desert Pointe Apartments](#)
[Cornerstone Crossings](#)
[Westcliff Pines 3](#)
[Westcliff Pines Senior Apartments](#)
[Emerald Park](#)

Mid-priced Listings on RENTCafé

[St. Lucia](#)
[Tesoro Ranch](#)
[Boulevard at 4201 Apartments](#)
[St Croix](#)
[Spectra at Reno](#)
[Reflections at the Lakes](#)
[Sky Court Harbors](#)
[Villanova](#)
[Copper Creek Apartments](#)
[Falcon Landing](#)

[Piedmont Springs](#)
[Cimarron](#)
[Tower at Tropicana](#)
[Borgata Condominiums](#)
[Walker House Apartments](#)
[St. Croix](#)
[Xander 3900](#)
[South Blvd](#)
[Vellagio Apartments](#)
[CenterPoint](#)

Most Expensive Listings on RENTCafé

[140 Bella Milano Ave](#)
[10033 Skipper Court](#)
[8821 Martin Downs](#)

[Constellation](#)
[7609 Winterthur Court Las Vegas, NV 89129](#)
[660 Beresford Avenue](#)

2/21/2019

Average Rent in Las Vegas & Rent Prices by Neighborhood - RENTCafé

[1671 Sandalwood Ln Las Vegas, NV 89119](#)
[7475 Babbs Court Las Vegas, NV 89123](#)
[9032 Sendero Avenue Las Vegas, NV 89178](#)
[9621 Port Orange Lane Las Vegas, NV 89134](#)
[3931 Kamden Way, Las Vegas, NV 89119](#)
[2866 Gables Vale Court](#)
[6158 Sweetbriar Court](#)

[2316 Brighton Shore Street Las Vegas, NV 89128](#)
[7195 Childers Ave](#)
[2920 Gables Vale Court](#)
[10896 Dornoch Castle Street Las Vegas, NV 89141](#)
[3800 Larkcrest Street](#)
[7370 Bachelors Button Drive](#)
[2960 Saint Rose Parkway](#)

[View more properties](#)

The rental statistics on this page were compiled using data provided by our sister company, [Yardi Matrix](#), an apartment market intelligence solution which offers comprehensive information on all Las Vegas apartment buildings 50 units or larger. Yardi Matrix covers ~80% of the U.S. metro area population, including over 80,000 properties and 15.2 million apartments across 124 U.S. markets.

Other Cities

[Atlanta](#), [Charlotte](#), [Chicago](#), [Dallas](#), [Enterprise](#), [Henderson](#), [Houston](#), [Los Angeles](#), [Miami](#), [North Las Vegas](#), [Paradise](#), [Philadelphia](#), [Phoenix](#), [Reno](#), [Sparks](#), [Spring Valley](#), [Sunrise Manor](#), [Washington DC](#), [Winchester](#)

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[San Antonio](#)
[San Francisco](#)
[Seattle](#)
[Washington DC](#)

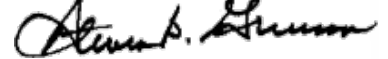
[RENTCafé Canada](#)

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FDF

Vincent Mayo, Esq.
Nevada State Bar Number: 8564
6252 South Rainbow Boulevard, Suite 100
Las Vegas, Nevada 89118
Phone: (702) 222-4021
Email: VMGroup@theabramslawfirm.com
Attorney for Plaintiff

Electronically Filed
2/26/2019 4:56 PM
Steven D. Grierson
CLERK OF THE COURT



Eighth Judicial District Court
Family Division
Clark County, Nevada

ADAM MICHAEL SOLINGER, Plaintiff, vs. CHALESE MARIE SOLINGER, Defendant.	Case No.: D-19-582245-D Department: I
--	--

GENERAL FINANCIAL DISCLOSURE FORM

A. Personal Information:

1. What is your full name? (*first, middle, last*) ADAM MICHAEL SOLINGER
2. How old are you? 30
3. What is your date of birth? 07/01/1988
4. What is your highest level of education? Law School

B. Employment Information:

1. Are you currently employed/ self-employed? (☒ *check one*)
☐ No
☒ Yes If yes, complete the table below. Attached an additional page if needed.

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
June 2015	Las Vegas Defense Grp.	Lead Attorney	Sunday - Saturday	9a-6p, but flexible

2. Are you disabled? (☒ *check one*)

☒ No
☐ Yes

If yes, what is your level of disability? _____
What agency certified you disabled? _____
What is the nature of your disability? _____

C. Prior Employment: If you are unemployed or have been working at your current job for less than 2 years, complete the following information.

Prior Employer: _____ Date of Hire: _____ Date of Termination: _____
Reason for Leaving: _____

Monthly Personal Income Schedule

A. Year-to-date Income.

As of the pay period ending February 15, 2019, my gross year to date pay is \$15,000.

B. Determine your Gross Monthly Income.

Hourly Wage

	×		=		×	52 Weeks	=		÷	12 Months	=	
Hourly Wage		Number of hours worked per week		Weekly Income				Annual Income				Gross Monthly Income

Annual Salary

\$120,000				\$10,000
Annual Income	÷	12 Months	=	Gross Monthly Income

C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income			
Bonuses	Varies	\$3,000/year	\$250
Car, Housing, or Other allowance:			
Commissions or Tips:			
Net Rental Income:			
Overtime Pay			
Pension/Retirement:			
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support			
Child Support			
Workman's Compensation			
Other:			
Total Average Other Income Received			\$250

Total Average Gross Monthly Income (add totals from B and C above)	\$10,250
--	----------

D. Monthly Deductions

	Type of Deduction	Amount
1.	Court Ordered Child Support (automatically deducted from paycheck)	
2.	Federal Health Savings Plan	
3.	Federal Income Tax	1,062.48
4.	Health Insurance Amount for you: _____ For Opposing Party: _____ For your Child(ren): _____	
5.	Life, Disability, or Other Insurance Premiums	
6.	Medicare	145.00
7.	Retirement, Pension, IRA, or 401(k)	700.00
8.	Savings	
9.	Social Security	620.00
10.	Union Dues	
11.	Other: (Type of Deduction)	
Total Monthly Deductions (Lines 1-11)		\$2,527.48

Business/Self-Employment Income & Expense Schedule**A. Business Income:**

What is your average gross (pre-tax) monthly income/revenue from self-employment or businesses?
\$ _____

B. Business Expenses: Attach an additional page if needed.

Type of Business Expense	Frequency	Amount	12 Month Average
Advertising			
Car and truck used for business			
Commissions, wages or fees			
Business Entertainment/Travel			
Insurance			
Legal and professional			
Mortgage or Rent			
Pension and profit-sharing plans			
Repairs and maintenance			
Supplies			
Taxes and licenses (include est. tax payments)			
Utilities			
Other:			
Total Average Business Expenses			

Personal Expense Schedule (Monthly)

A. Fill in the table with the amount of money **you** spend each month on the following expenses and check whether you pay the expense for you, for the other party, or for both of you.

Expense	Monthly Amount I Pay	For Me <input type="checkbox"/>	Other Party <input type="checkbox"/>	For Both <input type="checkbox"/>
Alimony/Spousal Support				
Auto Insurance				
Car Loan/Lease Payment				
Cell Phone				
Child Support (not deducted from pay)				
Clothing, Shoes, Etc...	150.00	X		
Credit Card Payments (minimum due)	250.00	250.00		
Dry Cleaning	20.00	X		
Electric	230.00	30.00	200.00	
Food (groceries & restaurants)	500.00	X		
Fuel	618.00		X	
Gas (for home)	124.82		X	
Health Insurance (not deducted from pay)				
HOA	90.00	X		
Home Insurance (if not included in mortgage)	75.00	15.00	60.00	
Home Phone				
Internet/Cable	280.00			X
Lawn Care				
Membership Fees	20.00		X	
Mortgage/Rent/Lease	2,600	1,280.00	1,320.00	
Pest Control	20.00		X	
Pets	80.00			X
Pool Service				
Property Taxes (if not included in mortgage)				
Security				
Sewer	63.97		X	
Student Loans				
Unreimbursed Medical Expense	60.00			X
Water	155.00			
Other:				
Child expenses from page 5	2,401.00			
Total Monthly Expenses	7,737.79			

Household Information

- A. Fill in the table below with the name and date of birth of each child, the person the child is living with, and whether the child is from this relationship. Attached a separate sheet if needed.

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 st	Michael Solinger	06/16/15	Both	Yes	No
2 nd	Marie Solinger	08/28/17	Both	Yes	No
3 rd					
4 th					

- B. Fill in the table below with the amount of money you spend each month on the following expenses for each child.

Type of Expense	1 st Child	2 nd Child	3 rd Child	4 th Child
Cellular Phone				
Child Care	1,200.00	961.00		
Clothing	100.00	100.00		
Education				
Entertainment	20.00	20.00		
Extracurricular & Sports				
Health Insurance (if not deducted from pay)				
Summer Camp/Programs				
Transportation Costs for Visitation				
Unreimbursed Medical Expenses				
Vehicle				
Other:				
Total Monthly Expenses	1,320.00	1,081.00		

- C. Fill in the table below with the names, ages, and the amount of money contributed by all persons living in the home over the age of eighteen. If more than 4 adult household members attached a separate sheet.

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc...)	Monthly Contribution

Personal Asset and Debt Chart

A. Complete this chart by listing all of your assets, the value of each, the amount owed on each, and whose name the asset or debt is under. If more than 15 assets, attach a separate sheet.

Line	Description of Asset and Debt Thereon	Gross Value		Total Amount Owed		Net Value	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	8500 Highland View Ave.	\$ 450,000	-	\$ 218,860	=	\$ 231,140	Both
2.	2017 Moto Guzzi Café Racer VIII	\$ 5,000	-	\$ 0	=	\$ 5,000	Adam
3.	Forest River Travel Trailer	\$ 5,000	-	\$ 0	=	\$ 5,000	Both
4.	Bank of America, joint checking	\$ 19,423	-	\$ 0	=	\$ 19,423	Both
5.	Art collection	\$ Unknown	-	\$ 0	=	\$ Unknown	Adam/Both
6.	Roth 401k	\$ 21,229	-	\$ 0	=	\$ 21,229	Adam
7.	Charles Schwab	\$ Unknown	-	\$ Unknown	=	\$ Unknown	Chalese
8.	Firearms	\$ 15,000	-	\$ 0	=	\$ 15,000	Adam/Both
9.		\$	-	\$	=	\$	
10.		\$	-	\$	=	\$	
11.		\$	-	\$	=	\$	
12.		\$	-	\$	=	\$	
13.		\$	-	\$	=	\$	
14.		\$	-	\$	=	\$	
15.		\$	-	\$	=	\$	
Total Value of Assets (add lines 1-15)		\$ 515,652	-	\$ 218,860	=	\$ 296,792	

B. Complete this chart by listing all of your unsecured debt, the amount owed on each account, and whose name the debt is under. If more than 5 unsecured debts, attach a separate sheet.

Line #	Description of Credit Card or Other Unsecured Debt	Total Amount owed	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	Bank of America credit card	\$ 15.84	Adam
2.	Capital One credit card	\$ Unknown	Chalese
3.		\$	
4.		\$	
5.		\$	
6.		\$	
Total Unsecured Debt (add lines 1-6)		\$ 15.84	

CERTIFICATION

Attorney Information: Complete the following sentences:

1. I have retained an attorney for this case.
2. As of the date of today, the attorney has been paid a total of \$ 10,000 on my behalf.
3. I have a credit with my attorney in the amount of \$ 9,320.50.
4. I currently owe my attorney a total of \$ 0.00.
5. I owe my prior attorney a total of \$ N/A.

IMPORTANT: Read the following paragraphs carefully and initial each one.

CS I swear or affirm under penalty of perjury that I have read and followed all instructions in completing this Financial Disclosure Form. I understand that, by my signature, I guarantee the truthfulness of the information on this Form. I also understand that if I knowingly make false statements I may be subject to punishment, including contempt of court.

CS I have attached a copy of my 3 most recent pay stubs to this form.

N/A I have attached a copy of my most recent YTD income statement/P&L statement to this form, if self-employed.

N/A I have not attached a copy of my pay stubs to this form because I am currently unemployed.

CS
Signature

2/26/19
Date

CERTIFICATE OF SERVICE

I hereby declare under the penalty of perjury of the State of Nevada that the following is true and correct:

That on (date) 2/26/19, service of the General Financial Disclosure Form was made to the following interested parties in the following manner:

☐ Via 1st Class U.S. Mail, postage fully prepaid addressed as follows:

☒ Via Electronic Service, in accordance with the Master Service List, pursuant to NEFCR 9, to:

Louis C. Schumacher, Esq.

☐ Via Facsimile and/or Email Pursuant to the Consent of Service by Electronic Means on file

herein to: _____

Executed on the 26th day of February, 20 19.


Signature

CO.	FILE	DEPT.	CLOCK	VCHR. NO.	576
IHJ	100126	000100	XN50K	0000020015	1

LAS VEGAS DEFENSE GROUP
2300 W SAHARA AVENUE
LAS VEGAS, NV 89102

Earnings Statement



Period Beginning: 12/27/2018
Period Ending: 01/11/2019
Pay Date: 01/15/2019

Taxable Marital Status: Married
Exemptions/Allowances:
Federal: 3
NV: No State Income Tax

ADAM MICHAEL SOLINGER
8500 HIGHLAND VIEW A
LAS VEGAS NV 89145

Earnings	rate	other/hours	this period	year to date
Regular	5416.67		5,000.00	5,000.00
Gross Pay			\$5,000.00	5,000.00

Important Notes

ADP TotalSource, Inc., A Professional Employer Organization
10200 Sunset Drive, Miami, FL 33173
1-800-554-1802

Deductions	Statutory	Other	this period	year to date
Federal Income Tax	-531.24		531.24	531.24
Social Security Tax	-310.00		310.00	310.00
Medicare Tax	-72.50		72.50	72.50
Other				
Adprs Roth	-350.00		350.00	350.00
Net Pay			\$3,736.26	
Checking	-3,736.26		3,736.26	3,736.26
Net Check			\$0.00	

BASIS OF PAY: NA

YOUR SALARY RATE HAS BEEN CHANGED FROM 3,520.83 TO 5,416.67.

Your federal taxable wages this period are
\$5,000.00

© 2009 ADP, LLC

ADP TotalSource
A Professional Employer Organization
5800 Windward Parkway
Alpharetta, GA 30005

Advice number: 00000020015
Pay date: 01/15/2019

Deposited to the account of	account number	transit	ABA	amount
ADAM MICHAEL SOLINGER	xxxxxxx7343	xxxx	xxxx	\$3,736.26

THIS IS NOT A CHECK

NON-NEGOTIABLE

000182

CO.	FILE	DEPT.	CLOCK	VCHR. NO	576
IHJ	100126	000100	XN50K	0000050015	1

LAS VEGAS DEFENSE GROUP
2300 W SAHARA AVENUE
LAS VEGAS, NV 89102

Earnings Statement



Period Beginning: 01/12/2019
Period Ending: 01/26/2019
Pay Date: 02/01/2019

Taxable Marital Status: Married
Exemptions/Allowances:
Federal: 3
NV: No State Income Tax

ADAM MICHAEL SOLINGER
8500 HIGHLAND VIEW A
LAS VEGAS NV 89145

Earnings	rate	other/hours	this period	year to date
Regular	5416.67		5,000.00	10,000.00
Gross Pay			\$5,000.00	10,000.00
Deductions				
Statutory				
Federal Income Tax			-531.24	1,062.48
Social Security Tax			-310.00	620.00
Medicare Tax			-72.50	145.00
Other				
Adprs Roth			-350.00	700.00
Net Pay			\$3,736.26	
Checking			-3,736.26	7,472.52
Net Check			\$0.00	

Important Notes

ADP TotalSource, Inc., A Professional Employer Organization
10200 Sunset Drive, Miami, FL 33173
1-800-554-1802

BASIS OF PAY: NA

Your federal taxable wages this period are
\$5,000.00

© 2000 ADP, LLC.

ADP TotalSource
A Professional Employer Organization
5800 Windward Parkway
Alpharetta, GA 30005

Advice number: 00000050015
Pay date: 02/01/2019

Deposited to the account of	account number	transit ABA	amount
ADAM MICHAEL SOLINGER	xxxxxxxx7343	xxxx xxxx	\$3,736.26

THIS IS NOT A CHECK

NON-NEGOTIABLE

000183

CO.	FILE	DEPT.	CLOCK	VCHR. NO.	676
IHJ	100126	000100	XN50K	0000070015	1

LAS VEGAS DEFENSE GROUP
2300 W SAHARA AVENUE
LAS VEGAS, NV 89102

Earnings Statement



Period Beginning: 01/27/2019
Period Ending: 02/11/2019
Pay Date: 02/15/2019

Taxable Marital Status: Married
Exemptions/Allowances:
Federal: 3
NV: No State Income Tax

ADAM MICHAEL SOLINGER
8500 HIGHLAND VIEW A
LAS VEGAS NV 89145

Earnings	rate	other/hours	this period	year to date
Regular	5416.67		5,000.00	15,000.00
Gross Pay			\$5,000.00	15,000.00

Important Notes

ADP TotalSource, Inc., A Professional Employer Organization
10200 Sunset Drive, Miami, FL 33173
1-800-554-1802

Deductions	Statutory		year to date
Federal Income Tax	-531.24		1,593.72
Social Security Tax	-310.00		930.00
Medicare Tax	-72.50		217.50
Other			
Adprs Roth	-350.00		1,050.00
Net Pay		\$3,736.26	
Checking	-3,736.26		11,208.78
Net Check		\$0.00	

BASIS OF PAY: NA

Your federal taxable wages this period are
\$5,000.00

© 2000 ADP, LLC

ADP TotalSource
A Professional Employer Organization
5800 Windward Parkway
Alpharetta, GA 30005

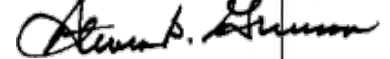
Advice number: 00000070015
Pay date: 02/15/2019

Deposited to the account of	account number	transit	ABA	amount
ADAM MICHAEL SOLINGER	xxxxxxxx7343	xxxx	xxxx	\$3,736.26

THIS IS NOT A CHECK

NON-NEGOTIABLE

000184



1 **OSFD**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

4 Tel: (702) 222-4021

Fax: (702) 248-9750

5 Email: VMGroup@theabramslawfirm.com

Attorney for Plaintiff

Eighth Judicial District Court

Family Division

Clark County, Nevada

8 ADAM MICHAEL SOLINGER,

9 Plaintiff,

10 vs.

11 CHALESE MARIE SOLINGER,

12 Defendant.

) Case No.: D-19-582245-D

)

) Department: I

)

)

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)

14 **ORDER TO SEAL RECORDS PURSUANT TO NRS 125.110(2)**

15 Upon written request of Plaintiff, Adam Michael Solinger, by and
16 through his attorney of record, Vincent Mayo, Esq., of The Abrams &
17 Mayo Law Firm, and pursuant to NRS 125.110(2), which states:

18 1. In any action for divorce, the following papers and
19 pleadings in the action shall be open to public inspection in
the clerk's office:

20 (a) In case the complaint is not answered by the
21 defendant, the summons, with the affidavit or proof of
service; the complaint with memorandum endorsed thereon
that the default of the defendant in not answering was
entered, and the judgment; and in case where service is

1 made by publication, the affidavit for publication of
2 summons and the order directing the publication of
summons.

3 (b) In all other cases, the pleadings, the finding of the
court, any order made on motion as provided in Nevada
Rules of Civil Procedure, and the judgment.

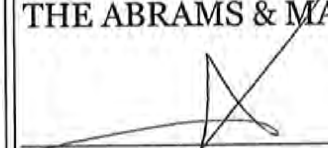
4 2. All other papers, records, proceedings and evidence,
including exhibits and transcript of the testimony, shall,
5 upon the written request of either party to the action, filed
with the clerk, be sealed and shall not be open to inspection
6 except to the parties or their attorneys, or when required as
evidence in another action or proceeding.
7

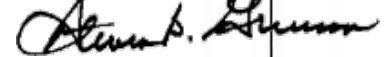
8 **THEREFORE, IT IS HEREBY ORDERED** that all documents
9 filed with the clerk in the above-entitled action except for pleadings,
10 findings of the Court, Orders made on motion as provided in the Nevada
11 Rules of Civil Procedure and any judgments, shall be and are hereby
12 sealed.

13 DATED this ___ day of MAR 08 2019, 2019.

14 
15 DISTRICT COURT JUDGE (j/cw)

16 THE ABRAMS & MAYO LAW FIRM

17 
18 Vincent Mayo, Esq. (8564)
19 6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Attorney for Plaintiff
20
21



1 **NEOJ**

2 Vincent Mayo, Esq.

3 Nevada State Bar Number: 8564

4 **THE ABRAMS & MAYO LAW FIRM**

5 6252 South Rainbow Blvd., Suite 100

6 Las Vegas, Nevada 89118

7 Tel: (702) 222-4021

8 Fax: (702) 248-9750

9 Email: VMGroup@theabramslawfirm.com

10 Attorney for Plaintiff

11 Eighth Judicial District Court

12 Family Division

13 Clark County, Nevada

14 ADAM MICHAEL SOLINGER,

) Case No.: D-19-582245-D

15 Plaintiff,

) Department: I

16 vs.

17 CHALESE MARIE SOLINGER,

18 Defendant.

19 **NOTICE OF ENTRY OF ORDER TO SEAL RECORDS**

20 PLEASE TAKE NOTICE that an Order to Seal Records was duly
21 entered in the above-referenced matter. A true and correct copy of said

22 ///

23 ///

24 ///

///

///

1 Order is attached hereto.

2 DATED Wednesday, March 13, 2019.

3 Respectfully Submitted,

4 THE ABRAMS & MAYO LAW FIRM

5
6 Vincent Mayo, Esq.

7 Nevada State Bar Number: 8564

8 6252 South Rainbow Blvd., Suite 100

9 Las Vegas, Nevada 89118

10 Attorney for Plaintiff

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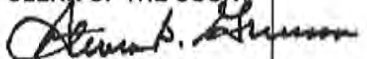
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Louis C. Schneider, Esq.
Attorney for Defendant


An Employee of The Abrams & Mayo Law Firm



OSFD

Vincent Mayo, Esq.
Nevada State Bar Number: 8564
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
Email: VMGroup@theabramslawfirm.com
Attorney for Plaintiff

Eighth Judicial District Court
Family Division
Clark County, Nevada

ADAM MICHAEL SOLINGER,)	Case No.: D-19-582245-D
)	
Plaintiff,)	Department: I
)	
vs.)	
)	
CHALESE MARIE SOLINGER,)	
)	
Defendant.)	
)	

ORDER TO SEAL RECORDS PURSUANT TO NRS 125.110(2)

Upon written request of Plaintiff, Adam Michael Solinger, by and through his attorney of record, Vincent Mayo, Esq., of The Abrams & Mayo Law Firm, and pursuant to NRS 125.110(2), which states:

1. In any action for divorce, the following papers and pleadings in the action shall be open to public inspection in the clerk's office:

(a) In case the complaint is not answered by the defendant, the summons, with the affidavit or proof of service; the complaint with memorandum endorsed thereon that the default of the defendant in not answering was entered, and the judgment; and in case where service is

1 made by publication, the affidavit for publication of
2 summons and the order directing the publication of
summons.

3 (b) In all other cases, the pleadings, the finding of the
4 court, any order made on motion as provided in Nevada
Rules of Civil Procedure, and the judgment.

5 2. All other papers, records, proceedings and evidence,
6 including exhibits and transcript of the testimony, shall,
upon the written request of either party to the action, filed
with the clerk, be sealed and shall not be open to inspection
except to the parties or their attorneys, or when required as
evidence in another action or proceeding.

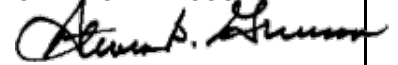
7
8 **THEREFORE, IT IS HEREBY ORDERED** that all documents
9 filed with the clerk in the above-entitled action except for pleadings,
10 findings of the Court, Orders made on motion as provided in the Nevada
11 Rules of Civil Procedure and any judgments, shall be and are hereby
12 sealed.

13 DATED this ___ day of MAR 08 2019, 2019.

14
15 
DISTRICT COURT JUDGE (u/cw)

16 THE ABRAMS & MAYO LAW FIRM

17
18 
19 Vincent Mayo, Esq. (8564)
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
20 Attorney for Plaintiff
21



LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number: 009683
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-435-2121
Fax: 702-431-3807
jhhowardesq@hotmail.com
Attorney for the Defendant/Counterclaimant,
Chalese Solinger

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

ADAM M. SOLINGER,

Plaintiff/Counterdefendant,

vs.

CHALESE M. SOLINGER,

Defendant/Counterclaimant.

Case Number: D-19-582245-D
Department: I

Date of Hearing: March 19, 2019
Time of Hearing: 9:00 a.m.

REPLY TO OPPOSITION AND COUNTERMOTION

COMES NOW Defendant, CHALESE M. SOLINGER, by and through her attorney, LOUIS C. SCHNEIDER, ESQ., and hereby files her Reply to Opposition and Countermotion.

This Reply is made and based upon the files, the papers and pleadings in this action, and any argument of counsel and evidence that may be adduced at the time of Hearing on the within Motion.

Dated this 18th day of March, 2019.

/s/ Louis C. Schneider

LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number: 009683

LOUIS C. SCHNEIDER, LLC.
430 South 7th Street
Las Vegas, Nevada 89101
Ph: 702-430-2121

STATEMENT OF FACTS

The parties to this action herein are in the middle of a divorce action wherein they temporarily have been sharing joint physical custody of their minor children to wit: Michael Adam Solinger, born June 16, 2015, and Marie Leona Solinger, born August 28, 2017. The initial schedule began Thursday wherein the Plaintiff would pick up the children and have them until Sunday. Plaintiff did have a two (2) scheduled compensatory make up days on Wednesdays but this is not the regular schedule utilized by the parties as Plaintiff claims in his opposition.

Prior to filing for divorce, Plaintiff also claims he was *fully* involved with the children's daily routine including making the children breakfast before school, preparing dinner for the family, giving the kids a bath before seeing them off to bed. This is quit a fabrication of actual facts to make the Plaintiff look superior to the Court. It is Defendant's recall that typically Plaintiff had already left for work before the kids ate breakfast and when returning from home he was irritated if asked to help with the evening events. Obviously it is the Defendant that is the primary care giver in the household given the parties' work schedule.

Since filing for divorce, Plaintiff has refused to act in a civil matter which has created a hostile situation when exchanging the children. He points out that Defendant is now dating Josh Lloyd and claims that Mr. Lloyd is living in the marital residence. While Mr. Lloyd has stayed with the Defendant on numerous occasions, especially since Plaintiff demanded that Defendant return the truck she was driving, Mr. Lloyd does not currently live with Defendant. Defendant has had to rely on her friends, like Mr. Lloyd since Plaintiff is not willing to end this marriage amicably. Plaintiff also goes into a tirade about Mr. Lloyd driving Plaintiff's father's vehicle. Defendant has asked Mr. Lloyd drive her on a few occasions but he does not regularly drive Plaintiff's father's vehicle. Mr. Lloyd has been generous enough to allow Defendant to use his vehicle after Plaintiff demanded she return his father's vehicle.

It has been financially straining on Defendant as well. Plaintiff had been the primary bread winner and typically would deposit his check into a joint bank account. Now Plaintiff limits the funds to just enough to pay most of the household bills leaving Defendant to scramble and figure out the remainder of the bills in addition to finding fund for groceries.

1 While Plaintiff wants this Court to think Defendant an unfit parent and has mental illness
2 preventing her from being a parent but he has consistently left the children with Defendant and fails
3 to admit he may have issues of his own. Plaintiff did go to his grandfather's funeral but does not
4 disclose that he had considered suicide during that trip. He told the Defendant he drove around
5 instead of returning home and thought of driving off of the cliff. Defendant has dealt with her issues
6 and currently sees a therapist. Plaintiff has not attempted to seek any help whatsoever and only
7 blames his problems and short comings on the Defendant. No one could fault Defendant for actively
8 working on herself and therefore setting a good example for her children by continuously working
9 with her therapist and getting the help she needs.

10 Plaintiff further fails to mention his "landlord" Jessica Sellers is actually his girlfriend and has
11 been well prior to the parties separation in November 2018. The lease provided is confirmation that
12 he is living with another women and is using community funds to pay her rent and her bills. It is also
13 Defendant's understanding that Jessica Sellers is Plaintiff's assistant.

14 Plaintiff has decided focus on litigating as apposed to discussing settlement. The parties
15 currently share joint legal custody and joint physical custody and it is more than likely the Court will
16 award the same. Defendant asked for primary custody to ensure their son was getting the medical
17 attention needed. Now Plaintiff is nit picking the Doctor dispite being fully aware of what their son
18 needs and has intentionally delayed having surgery to micro-manage Defendant.

19 Plaintiff's claims of Defendant being a drug addict are completely false. Defendant does take
20 anti-depressants and has smoked marijuana on occasions but the "bong" Plaintiff produced as an
21 Exhibit is actually his. Defendant discarded a majority of the paraphernalia but Plaintiff had already
22 been taking pictures. Plaintiff has had access to the parties home since he left in November 2018.
23 Plaintiff has also been stalking Defendant trying to follow her and Mr. Lloyd on their security cameras
24 and on Social Media. Defendant has blocked Plaintiff on Facebook but did not realize that he was
25 searching on Mr. Lloyd's Facebook making assumptions of the relationship between them.

26 . . .

27 . . .

28 . . .

1 Plaintiff being an attorney, knows what to expect from litigation and has obviously prepared
2 wherein Defendant has had to retain an attorney to help her with litigation. The only experience the
3 Defendant has is with her parents' nasty litigious divorce. Given the disparity in incomes and
4 inexperience of the Defendant, she should be awarded preliminary attorney's fees.

5 Defendant and her attorney had hoped to negotiate the matter without Court intervention and
6 attempted to do so but temporary orders issued by the Court are now necessary.

7 **DATED** this 18th day of March, 2019.

8
9 */s/ Louis C. Schneider*

10 **LOUIS C. SCHNEIDER, ESQ.**

11 Nevada Bar Number: 009683

12 430 South 7th Street

13 Las Vegas, Nevada 89101

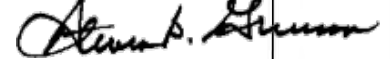
14 Ph: 702-435-2121

15 Fax: 702-431-3807

16 jhhowardescq@hotmail.com

17 Attorney for the Defendant/Counterclaimant,

18 Chalese Solingr
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1 **EXH**

Vincent Mayo, Esq.
2 Nevada State Bar Number: 8564
THE ABRAMS & MAYO LAW FIRM
3 6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
4 Tel: (702) 222-4021
Fax: (702) 248-9750
5 Email: VMGroup@theabramslawfirm.com
Attorney for Plaintiff

6 Eighth Judicial District Court
Family Division
7 Clark County, Nevada

8 ADAM MICHAEL SOLINGER,)	Case No.: D-19-582245-D
)	
9 Plaintiff,)	Department: I
vs.)	
10 CHALESE MARIE SOLINGER,)	Date of Hearing: March 5, 2019
)	Time of Hearing: 3:30 p.m.
11 Defendant.)	

12
13 **APPENDIX OF SUPPLEMENTAL EXHIBITS TO PLAINTIFF'S**
14 **OPPOSITION TO AMENDED MOTION TO SET ASIDE**
15 **DEFAULT; FOR EXCLUSIVE POSSESSION OF THE MARITAL**
16 **RESIDENCE AND ORDERING PLAINTIFF TO ASSIST IN**
17 **MAKING MORTGAGE PAYMENTS; FOR MEDICAL LEGAL**
18 **CUSTODY OF THE MINOR CHILDREN; FOR AN ORDER**
19 **REFERRING THE PARTIES TO MEDIATION PURSUANT TO**
20 **EDCR 5.70, FOR AN ORDER AWARDING PLAINTIFF CHILD**
21 **SUPPORT; FOR AN ORDER AWARDING DEFENDANT**
ALIMONY; AND FOR ATTORNEY'S FEES AND COSTS
PRIMARY PHYSICAL CUSTODY, CHILD SUPPORT, AND
ATTORNEY'S FEES AND COSTS AND
COUNTERMOTION FOR JOINT LEGAL CUSTODY; PRIMARY
PHYSICAL CUSTODY TO PLAINTIFF AND SUPERVISED
VISITATION TO DEFENDANT; TO ESTABLISH CHILD
SUPPORT; TO ESTABLISH PAYMENT OF MARITAL
EXPENSES; FOR AN ORDER PROTECTING THE PARTIES'
COMMUNITY PROPERTY; DEFENDANT TO OBTAIN

1 **EMPLOYMENT AND TO COOPERATE IN A VOCATIONAL**
2 **ASSESSMENT**

3

Exhibit	Description
4 13	Text message exchange between parties regarding Chalese's behavior when picking up the children
5 14	Joshua Lloyd's Facebook post dated March 13, 2019
6 15	Letter from Attorney Mayo to Attorney Schneider dated March 12, 2019

7

8 Dated Monday, March 18, 2019.

9 Respectfully Submitted,

10 THE ABRAMS & MAYO LAW FIRM

11 /s/ Vincent Mayo, Esq.

12 Vincent Mayo, Esq.

13 Nevada State Bar Number: 8564

14 6252 South Rainbow Blvd., Suite 100

15 Las Vegas, Nevada 89118

16 Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *APPENDIX OF SUPPLEMENTAL EXHIBITS TO PLAINTIFF'S OPPOSITION TO AMENDED MOTION TO SET ASIDE DEFAULT; FOR EXCLUSIVE POSSESSION OF THE MARITAL RESIDENCE AND ORDERING PLAINTIFF TO ASSIST IN MAKING MORTGAGE PAYMENTS; FOR MEDICAL LEGAL CUSTODY OF THE MINOR CHILDREN; FOR AN ORDER REFERRING THE PARTIES TO MEDIATION PURSUANT TO DECRY 5.70, FOR AN ORDER AWARDING PLAINTIFF CHILD SUPPORT; FOR AN ORDER AWARDING DEFENDANT ALIMONY; AND FOR ATTORNEY'S FEES AND COSTS PRIMARY PHYSICAL CUSTODY, CHILD SUPPORT, AND ATTORNEY'S FEES AND COSTS AND COUNTERMOTION FOR JOINT LEGAL CUSTODY; PRIMARY PHYSICAL CUSTODY TO PLAINTIFF AND SUPERVISED VISITATION TO DEFENDANT; TO ESTABLISH CHILD SUPPORT; TO ESTABLISH PAYMENT OF MARITAL EXPENSES; FOR AN ORDER PROTECTING THE PARTIES' COMMUNITY PROPERTY; DEFENDANT TO OBTAIN EMPLOYMENT AND TO COOPERATE IN A VOCATIONAL ASSESSMENT* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Monday, March 18, 2019.

1 Electronic service of the foregoing document shall be made in
2 accordance with the Master Service

3 List, pursuant to NEFCR 9, as follows:

4 Louis Schneider, Esq.
Attorney for Defendant

5

6

7 /s/ Chantel Wade
An Employee of The Abrams & Mayo Law Firm

8

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EXHIBIT 13

EXHIBIT 13

EXHIBIT 13

3:58

LTE



+1 (702) 575-7620

Just because you're upset at me does not give you the right to grab them like that. That is the exact reason I need primary custody. You cannot be trusted with my children. You're letting your anger affect your judgment and dragging Maq to the truck like that is completely unacceptable. Snatching Marie like that was completely uncalled for and you could have really hurt her.

This is why the drop offs need to be done at school. You're not capable of controlling your emotions and you take it out on the kids.

I had to take them to feed them and we had plans. There's no excuse for them not being fed anything by 12 pm

They had breakfast and snack. Lunch is at noon. You said you



iMessage



3:58

LTE



+1 (702) 575-7620 >

to grab them like that. That is the exact reason I need primary custody. You cannot be trusted with my children. You're letting your anger affect your judgment and dragging Maq to the truck like that is completely unacceptable. Snatching Marie like that was completely uncalled for and you could have really hurt her.

This is why the drop offs need to be done at school. You're not capable of controlling your emotions and you take it out on the kids.

I had to take them to feed them and we had plans. There's no excuse for them not being fed anything by 12 pm

They had breakfast and snack. Lunch is at noon. You said you were coming around 11:30

Delivered



iMessage



EXHIBIT 14

EXHIBIT 14

EXHIBIT 14



Josh Lloyd shared a post.

March 13 at 7:42 AM · 🌐



CALL ME CHILDISH
BUT BEATING
THE GPS TIME
IS AN EXTREME
SPORT FOR ME.

Nerds with Vaginas

March 8 at 9:20 PM · 🌐

👍 Like Page

EXHIBIT 15

EXHIBIT 15

EXHIBIT 15



†† Jennifer V. Abrams, Esq.
† Vincent Mayo, Esq.
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
P. 702.222.4021 F. 702.248.9750
www.TheAbramsLawFirm.com

Tuesday, March 12, 2019

Louis C. Schneider, Esq.
430 S. 7th Street
Las Vegas, Nevada 89101

Re: Adam M. Solinger v. Chalese M. Solinger
Case Number: D-19-582245-D

Dear Mr. Schneider:

I am in receipt of your correspondence dated March 6, 2019, and it appears your client is not being open and honest with you. The truck that Chalese has been driving belongs to Adam's father, Michael Solinger ("Michael"). Adam's father permitted the parties to use it. However, Chalese has been letting her new live in boyfriend drive the vehicle – something Chalese does not deny.¹ Obviously, Michael does not agree to a third party driving his vehicle, especially someone he does not know, who is not on the parties' insurance and who has a horrible driving record.² What also worries Michael is that Mr. Lloyd is not driving his own truck. These concerns on Michael's part are what caused Adam to tell Chalese that she needed to stop allowing Mr. Lloyd to drive Michael's truck and if she didn't, his father wanted the truck back. As you can therefore see, Michael's position is not "ridiculous" as Chalese claims. If anything, it is no different than what any of us would require, including the judge. Michael was doing the parties a favor in allowing them to use his truck and has no obligation to allow Chalese to continue driving the truck if she won't abide by his wishes. All that was asked by Michael via Adam was that Chalese not allow Mr. Lloyd to drive it. In response, Chalese irrationally and spitefully states, "If I choose to let someone drive instead of me in my truck that's my business." However, the truck does not belong to either party, it belongs to Michael. Adam is not saying Chalese cannot continue driving the truck for now, just that Mr. Lloyd cannot. Please speak to your client and either have her commit to Michael's wishes and the truck can be returned for now. If not, Michael has instructed Adam not to do so.

That brings us to the \$9,000. In the texts, Chalese states that because she refuses to commit to Mr. Lloyd not driving Michael's truck, she would return the truck to Adam

¹ See the attached texts between the parties.

² See Mr. Lloyd's driving record, attached hereto.

† Board Certified Family Law Specialist

* Fellow of the American Academy of Matrimonial Lawyers; Admitted in Nevada, California, and Louisiana

Tuesday, March 12, 2019
Adam M. Solinger v. Chalese M. Solinger
Page 2 of 2

The Abrams & Mayo Law Firm

and unilaterally buy a new truck. Concerned that Chalese would follow through with her threat, Adam withdrew half the funds in the account to protect his share of the monies. This was a perfectly reasonable response to Chalese's senseless position.

As for the buying and selling of major appliances, or giving away items, these have to be agreed to between the parties. Chalese cannot unilaterally do so or allow her significant other to do so.

Finally, we are willing to talk settlement. However, Chalese refuses to discuss the issues Adam has brought up in mediation. An unwillingness to do so does not bode well for someone wishing to have joint custody. Also, Adam's concerns regarding his father's truck are not petty. Chalese simply needs to communicate and be reasonable with property belonging to third parties.

As always, should you have any questions or comments, please do not hesitate to call.

Sincerely,

THE ABRAMS & MAYO LAW FIRM



Vincent Mayo, Esq.

CC: Mr. Adam Solinger

000207

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

4:07



+1 (702) 575-7620 >

Thursday 6:16 PM

I'm going to have to take the truck back if josh keeps driving it. He's not insured and my dad made it very clear he does not want him driving the truck. If I see it again, my dad will take the truck back.

Come take it. And then let me know how you'd like to pay for the car you'll have to buy me



Better yet, give me your address and I'll come bring it to you nowadays

All I'm asking is he doesn't drive the truck that my dad insures you under. Be a little respectful.

Just like your gf drives your car? Be a little respectful. Give me your address. I should have it anyway I'm not playing these



iMessage



000209

4:07



+1 (702) 575-7620

Just like your gf drives your car? Be a little respectful. Give me your address. I should have it anyway. I'm not playing these games. I'll bring the truck over tonight and go get a car tomorrow.

Also, his insurance covers any vehicles he drives. Where am I taking this truck? I'm leaving now.

You're being highly irrational now for what's a simple request. All I ask is josh doesn't drive the truck. Plus, if there's a reason you can't drive the truck, then you shouldn't be using a car to drive the kids around. Why isn't he using his own truck if you can't drive right now like you said at smiths.

I've sent you my address before.



iMessage



4:07



+1 (702) 575-7620 >

I've sent you my address before.

If I choose to let someone drive instead of me in my truck that's my business. I don't have to have any reason and I sure don't have to let you know every detail of my choices. I'm not going to let you threaten and scare me into following your wishes. If you want to set rules for how or who I transport in my vehicle, which I will not obey, then take it

I don't have it saved. Please send me your address

"My truck?" It's my dad's truck, That he is kindly letting you drive and insured you on. Please respect his wishes and don't have others drive it. You cannot just buy another vehicle because of the injunction.



iMessage



EXHIBIT 2

EXHIBIT 2

EXHIBIT 2

Traffic Case Records Search Results

[Skip to Main Content](#) [Logout](#) [My Account](#) [Search Menu](#) [New Traffic Search](#) [Refine Search](#)

Location : Traffic Help

Record Count: 10

Search By: Defendant Party Search Mode: Name Last Name: lloyd First Name: joshua All All Sort By: Filed Date

Case Number	Citation Number	Defendant Info	Filed/Location	Type/Status	Charge(s)
104449209	104449209	LLOYD, JOSHUA DOUGLAS	01/02/2010 Traffic	Traffic Open	DRIVING W/O VALID LICENSE
104526363	104526363	LLOYD, JOSHUA DOUGLAS	03/04/2010 Traffic	Traffic Open	DRIVING W/O VALID LICENSE
104379380	104379380 104379380	LLOYD, JOSHUA DOUGLAS	03/08/2010 Traffic	Traffic Open	LICENSE PLATE LIGHT REQUIRED DRIVING W/O VALID LICENSE
104611105	104611105 104611105	LLOYD, JOSHUA	08/14/2010 Traffic	Traffic Closed	SPEEDING 1-10 MPH OVR PSTD SPD LIMIT INSURANCE REQUIRED
104395434	104395434 104395434	LLOYD, JOSHUA DOUGLAS	01/19/2011 Traffic	Traffic Open	SPEEDING 11-20 MPH OVR PSTD SPD LIMIT/NONCMV UNSAFE TURNING MOVEMENT
104806155	104806155 104806155	LLOYD, JOSHUA DOUGLAS	09/23/2011 Traffic	Traffic Open	DISREGARDING OFFICIAL TRAFFIC CONTROL DEVICE INSURANCE REQUIRED
E10151684	E10151684 E10151684	LLOYD, JOSHUA DOUGLAS	03/05/2012 Traffic	Traffic Open	SPEEDING 1-10 MPH OVR PSTD SPD LIMIT LICENSE IN POSSESSION- SURRENDER ON DEMAND
105075925	105075925	LLOYD, JOSHUA D	06/11/2013 Traffic	Traffic Open	TURNING AT INTERSECTION
E10519374	E10519374	LLOYD, JOSHUA D	05/21/2015 Traffic	Traffic Closed	Follow too closely [53794]
LVM0214608	LVM0214608	LLOYD, JOSHUA DOUGLAS	04/14/2017 Traffic	Traffic Closed	Basic speed - 1-10 mph over posted limit [53849]

16TR004054

Case Type: TRAFFIC
Case Status: CLOSED
File Date: 03/01/2016
DCM Track:
Action: DRIVER FAIL TO OBEY
TRAFFIC CONTROL
DEVICES
Status Date:
Case Judge: STEVENS, MARK J
Next Event:

All Information Party Charge Ticket/Citation # Event Docket Financial

Party Information

LLOYD, JOSHUA DOUGLAS - DEFENDANT

DOB 09/27/1991

Party Charge Information

LLOYD, JOSHUA DOUGLAS

Charge # 1:

53760 - MISDEMEANOR DRIVER FAIL TO OBEY TRAFFIC CONTROL DEVICES

Original Charge 53760 DRIVER FAIL TO OBEY TRAFFIC CONTROL
DEVICES (MISDEMEANOR)Ticket # X01543548
Date of Offense 02/19/2016

Party Charge Disposition
Disposition Date
Disposition
06/15/2016
SENTENCED

Ticket/Citation #

Citation # : X01543548 Offense Date 02/19/2016

Officer NHP, NHP(NHP)

Speed Cited
Speed Limit
Location 215/146
Accident N
Work Zone
Haz Mat

Events

Date/Time	Location	Type	Result	Event Judge
05/24/2016 08:00 AM	DEPARTMENT 1	ADULT TRAFFIC ARRAIGNMENT	FTA BENCH WARRANT NOTICE ORDERED - TR	STEVENS, MARK J

Docket Information

Date	Description
03/01/2016	COURT DATE SET:
05/24/2016	EVENT PARTICIPANTS:
05/24/2016	FTA - BWN ORDERED

3/12/2019

eAccess - Henderson Municipal Court

Date	Description
05/24/2016	FTA BWN MAILED
06/15/2016	BWN CLEARED
06/15/2016	FINE PAID IN FULL
06/15/2016	DMV CONVICTION SENT
06/15/2016	PLEA: GUILTY PLEA ENTERED
06/15/2016	SENTENCED: VIA WEB
06/15/2016	FINE/FORFEITURE: \$100 + 95
06/15/2016	CASE CLOSED

Financial Summary				
Cost Type	Amount Owed	Amount Paid	Amount Adjusted	Amount Outstanding
COST	\$195.00	\$195.00	\$0.00	\$0.00
	\$195.00	\$195.00	\$0.00	\$0.00

MAR 19 2019STEVEN D. GRIERSON
CLERK OF THE COURTBY Michelle Cunningham
DEPUTY

ORD

**DISTRICT COURT
CLARK COUNTY, NEVADA**Adam Solinger
PLAINTIFFCASE NUMBER: D-19-S82245-DDEPARTMENT: IVS.
Chalese Solinger
DEFENDANT.Date of Conference: 3-19-19Time of Conference: 9:00 AM**CASE AND NON-JURY TRIAL MANAGEMENT ORDER**

This order sets forth critical dates and times for the major proceedings in this case. It is the responsibility of the attorneys, or the litigants (when appearing in proper person), to meet the deadlines and to appear for the following required proceedings:

CALENDAR CALL DATE:

9/9/19 at 9AM

NON-JURY TRIAL DATE: (Stack 1)

Day 1 - 10/9/19 @ 9AMDay 2 - 10/10/19 @ 9AM

PRETRIAL MEMORANDUM DUE:

9/9/19

DISCOVERY CLOSES ON:

9/9/19

1 This matter having come on for a Case Management
2
3 Conference, pursuant to NRCP 16.2, in the Family Division, Department
4 I, of the Eighth Judicial District Court, County of Clark, and Plaintiff,
5 being represented by _____, and Defendant,
6 being represented by _____, and the Court
7 being fully advised in the premises, both as to subject matter as well as
8 the parties thereto, and that jurisdiction is proper in Nevada, and good
9 cause appearing, the court makes the following findings:
10
11

12 The parties shall participate in the discovery process in good
13 faith and may utilize all discovery methods, consistent with NRCP 16.2.
14

15 Within 15 days of this Order, the parties shall submit a list of names
16 of individuals who are likely to possess discoverable information
17 regarding this action, consistent with NRCP 16.2(a)(2)(A) and a list of all
18 documents provided at or as a result of the Case Management
19 Conference consistent with NRCP 16.2(a)(2)(B).
20
21

22 The Pre-Trial Memorandum shall substantially comply with the
23 form attached hereto including the Asset and Debt Schedules. Failure to
24 submit the Pre-Trial Memorandum on or before this date, absent the
25
26
27
28

1 Court's approval, will result in the trial date being vacated and the
2
3 matter rescheduled in ordinary course and/or sanctions.

4 **Failure to appear at the Calendar Call may result in a**
5
6 **default judgment, or other sanctions, consistent with**
7
8 **EDCR 2.69.**

9
10 Counsel or proper person litigants are to provide the following
11 to opposing counsel/proper person litigant with the following prior to
12 the calendar call:
13

- 14 1. List of witnesses
15
16 2. List of exhibits
17
18 3. Any other discovery items sought to be introduced at trial.

19 **Failure to provide the above foregoing may result in**
20
21 **such witnesses, exhibits, or evidence being excluded or**
22
23 **other appropriate court-imposed sanctions against**
24 **counsel or party in proper person.**


25
26 Any and all Exhibits and Witness Lists (a set of original exhibits
27 ready for marking by the Clerk with a courtesy copy for the Court), must
28

1 be delivered to chambers at least two (2) judicial days prior to trial for
2
3 marking.

4 Absent stipulation of the parties (and good cause appearing
5 therefore), no continuances will be granted to either party unless written
6 application is made to the Court, served upon opposing counsel, and a
7 hearing held at least three (3) days prior to the time of trial. If this matter
8 settles, please advise the Court as soon as possible.
9
10

11 IT IS HEREBY ORDERED that the above-stated findings are
12 hereby adopted and confirmed as an order of this Court.
13
14

15 DATED this 19th day of March, 2019
16

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18 
19 CHERYL B. MOSS
20 District Court Judge
21
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FILED IN OPEN COURT
MAR 19 2019

DISTRICT COURT
CLARK COUNTY, NEVADA
FAMILY DIVISION

STEVEN D. GRIERSON
CLERK OF THE COURT

BY Michelle Cunningham
Michelle Cunningham DEPUT

Adam Solinger,

Plaintiff,

vs.

Case No: D-19-582245-1

Dept No: I

Chalese Solinger,

Defendant.

BEHAVIOR ORDER

The parties are hereby ORDERED to do, or not to do the following, as stated in this Order:

1. No abusive contact (foul language, name calling, etc.) including telephone calls, voicemails, letters, email, texts, all forms of social media, etc., to the other party or to the child(ren).

2. Avoid any unnecessary contact with the other party's "significant other" and friends not in common with you and do not initiate conflicts with them.

3. No unnecessary contact with other people associated with or to the other party for purposes of discussing court proceedings or making negative/disparaging allegations against the other party (this includes all forms of social media).

1 4. You will advise all of your friends, relatives and "significant other" not
2
3 to disparage, criticize or harass the other party, and that co-parenting requires
4 facilitating a positive relationship with the other party; that you could have your
5 parenting time limited if you are unable to stop their negative behavior, and that
6 you may be sanctioned if the Court finds that you are knowingly allowing them
7 to violate the Behavior Order.
8

9 5. No harassment at the other party's place(s) of employment, including
10 contacting the employer to make negative or disparaging allegations; or to send
11 or drop off evidence as it relates to these court proceedings that appears
12 reasonably designed to put them, or likely to put them in a bad light or to get
13 them fired, or to have them suffer negative consequences as a result.
14

15 6. No providing copies of unsolicited documents (personal letters, court
16 pleadings, emails, texts, etc.) to anyone associated with a party (significant
17 others, family members, neighbors, employers, etc.) for the intended purpose of
18 shedding the other party in a negative light.
19

20 7. Neither party shall post, nor shall you allow significant others or family
21 members on social media to post, including, but not limited to, FaceBook,
22 Twitter, YouTube, Instagram, LinkedIn, Tumblr, and Google+, any negative or
23 disparaging allegation against or negative image of the other party or anyone
24 associated with the other party.
25
26
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1 8. Pursuant to EDCR 5.301, you will not discuss any of the court issues or
2 proceedings with the minor children; this includes showing them any part of the
3 pleadings or attachments/exhibits (including audio and video) thereto; you will
4 take every precaution to secure copies of pleadings safely away from the eyes of
5 the children at all times. This means all evidence of litigation generated *on your*
6 *side* and from the other party's side.
7

8
9 9. Neither party shall interrogate the child(ren) as to the activities or
10 events at the other parent's residence, etc., and shall try to respect and not
11 interfere with the child(ren)'s privacy and relationship with the other parent; do
12 not place your child(ren) in a loyalty bind between yourself and the other parent;
13 your child(ren) need to be able to love both of you freely in both of your homes
14 for healthy child development.
15

16
17 10. Neither party shall interfere with the other party's contact with the
18 minor children, including but not limited to telephone, email, social networking
19 contacts, etc.; where telephone/video conferencing is part of your parent contact
20 you may not take a smart phone or iPad from a child as a means of discipline
21 when a child uses this technology to contact the non-residential parent. You must
22 maintain a device accessible to the child(ren) charged or with accessible charger
23 at all times, absent a Court Order otherwise.
24
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1 11. Neither party shall threaten to commit or actually commit an act of
2 violence upon the other party, upon the child(ren) in common of the parties, upon
3 child(ren) not in common of a party, or upon the significant other, friend,
4 relative, employer, employee, neighbor, etc. of a party.
5

6
7 12. Child custody exchanges, visitations, etc., shall be done in a civil, law
8 abiding manner and reasonably close to the times specified by the Court. In the
9 event of an emergency or unforeseen circumstance that could affect an exchange
10 of the child or the time of the exchange, a party shall call or contact the other
11 party as soon as is reasonably possible.
12

13
14 13. In the event of an emergency or unforeseen circumstance that could
15 affect an exchange of the child or the time of the exchange, the party
16 experiencing the emergency shall contact the other party as soon as reasonably
17 possible.
18

19 14. There shall be no spoliation, destruction, alteration or modification of
20 electronic evidence such as emails, texts, social media of all forms, or voicemails,
21 audio recordings, video recordings, or phones, iPads, etc., with any information
22 that either party or the Court may deem relevant to the current court proceedings.
23


24 15. There shall be no invasion of the electronic devices, email accounts,
25 social media accounts, separate bank accounts, safe deposit boxes, separate
26 residences or separate vehicles, etc. of the other party.
27
28

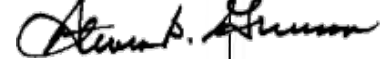
1 16. Except as modified herein, all other court orders remain in full force
2 and effect.
3

4 **POSSIBLE SANCTIONS**

5 The parties are HEREBY PUT ON NOTICE THAT EACH AND EVERY
6 VIOLATION of this order, if admitted to, or if found after evidentiary hearing to
7 have committed an act that violates this Order, may result in the party being held
8 in contempt of court pursuant to NRS Ch. 22, which could result in a fine of
9 \$500.00 and/or up to 25 days in jail and/or attorneys fees for EACH
10 VIOLATION.
11
12

13 DATED this 19th day of March, 2019, 2019.

14
15 
16 **CHERYL B. MOSS**
17 DISTRICT COURT JUDGE
18 FAMILY DIVISION DEPT. I
19
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1 **ASSC**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

4 Tel: (702) 222-4021

Fax: (702) 248-9750

5 Email: vmgroup@theabramslawfirm.com

Attorney for Plaintiff

6 Eighth Judicial District Court

Family Division

7 Clark County, Nevada

8 ADAM MICHAEL SOLINGER,

) Case No.: D-19-582245-D

9 Plaintiff,

) Department: I

10 vs.

11 CHALESE MARIE SOLINGER,

12 Defendant.

13
14 **NOTICE OF ASSOCIATION OF COUNSEL**

15 TO: CHALESE MARIE SOLINGER, Defendant;

16 TO: LOUIS SCHNEIDER, ESQ., 430 S. 7th Street, Las Vegas, Nevada

17 89101; Attorney for Defendant;

18 PLEASE TAKE NOTICE that JENNIFER V. ABRAMS, ESQ., of

19 THE ABRAMS & MAYO LAW FIRM, hereby associates as counsel with,

20 VINCENT MAYO, ESQ., in the above-entitled action, for the

21 ///

1 representation of ADAM MICHAEL SOLINGER.

2 Dated: Wednesday, March 20, 2019.

3 Respectfully submitted:
4 THE ABRAMS & MAYO LAW FIRM

5 /s/ Jennifer V. Abrams, Esq.
6 Jennifer V. Abrams, Esq. (7575)
7 6252 South Rainbow Blvd., Suite 100
8 Las Vegas, Nevada 89118
9 Attorney for Plaintiff

8 **CERTIFICATE OF SERVICE**

9 I hereby certify that the foregoing *Notice of Association of Counsel*
10 was filed electronically with the Eighth Judicial District Court in the
11 above-entitled matter on Wednesday, March 20, 2019. Electronic
12 service of the foregoing document shall be made in accordance with the
13 Master Service List, pursuant to NEFCR 9, as follows:

14 Louis Schneider, Esq.
15 Attorney for Defendant

16 /s/ Chantel Wade
17 An Employee of The Abrams & Mayo Law Firm
18
19
20
21

Steven D. Grierson

1 **SAO**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

4 Tel: (702) 222-4021

Fax: (702) 248-9750

5 Email: vmgroup@theabramslawfirm.com

Attorney for Plaintiff

6 Eighth Judicial District Court

Family Division

7 Clark County, Nevada

8 ADAM MICHAEL SOLINGER,

) Case No.: D-19-582245-D

9 Plaintiff,

) Department: I

10 vs.

11 CHALESE MARIE SOLINGER,

12 Defendant.

13
14 **STIPULATION AND ORDER MODIFYING TIMESHARE**

15 **COME NOT THE PARTIES**, Plaintiff, ADAM MICHAEL

16 SOLINGER (hereinafter referred to as "Adam"), by and through his

17 attorney of record, VINCENT MAYO, ESQ., and Defendant, CHALESE

18 MARIE SOLINGER (hereinafter referred to as "Chalese"), by and

19 through her attorney of record, LOUIS C. SCHNEIDER, ESQ., and

20 hereby agree to the following:

21 ///

APR 16 2019

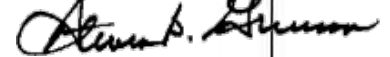
1 **WHEREAS** the parties have agreed to modify their temporary
2 custodial timeshare;

3 **WHEREAS** the new timeshare has been in effect since March 24,
4 2019; and

5 **WHEREAS** the parties' new custodial timeshare is in the child's
6 best interest but without prejudice.

7 **NOW THEREFORE**, in consideration of the aforementioned,

8 **IT IS HEREBY STIPULATED AND AGREED** that effective
9 immediately, the parties adopt the following temporary 2/2/3 weekly
10 timeshare, which will replace the 4/3/3/4 timeshare ordered by the
11 court on March 19, 2019: Week One: Adam has the children from
12 Monday after school through Wednesday after school/daycare. Chalese
13 has the children from Wednesday after school/daycare through Friday
14 after school/daycare. Adam has the children from Friday after
15 school/daycare through Monday after school/daycare. Week Two:
16 Chalese has the children from Monday after school/daycare through
17 Wednesday after school/daycare. Adam has the children from
18 Wednesday after school/daycare through Friday after school/daycare.
19 Chalese has the children from Friday after school/daycare through
20 Monday afterschool/daycare.



1 **NEOJ**

2 Vincent Mayo, Esq.

3 Nevada State Bar Number: 8564

4 **THE ABRAMS & MAYO LAW FIRM**

5 6252 South Rainbow Blvd., Suite 100

6 Las Vegas, Nevada 89118

7 Tel: (702) 222-4021

8 Fax: (702) 248-9750

9 Email: VMGroup@theabramslawfirm.com

10 Attorney for Plaintiff

11 Eighth Judicial District Court

12 Family Division

13 Clark County, Nevada

14 ADAM MICHAEL SOLINGER,

) Case No.: D-19-582245-D

15 Plaintiff,

) Department: I

16 vs.

17 CHALESE MARIE SOLINGER,

18 Defendant.

19 **NOTICE OF ENTRY OF STIPULATION AND ORDER**

20 **MODIFYING TIMESHARE**

21 PLEASE TAKE NOTICE that the Stipulation and Order Modifying
22 Timeshare was duly entered in the above-referenced matter. A true and
23 correct copy of said
24

///

///

///

1 Stipulation and Order is attached hereto.

2 DATED Monday, April 22, 2019.

3 Respectfully Submitted,

4 THE ABRAMS & MAYO LAW FIRM

5
6
7 Vincent Mayo, Esq.

8 Nevada State Bar Number: 8564

9 6252 South Rainbow Blvd., Suite 100

10 Las Vegas, Nevada 89118

11 Attorney for Plaintiff

12

13

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Louis C. Schneider, Esq.
Attorney for Defendant


An Employee of The Abrams & Mayo Law Firm

Steven D. Grierson

1 **SAO**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

4 Tel: (702) 222-4021

Fax: (702) 248-9750

5 Email: vmgroup@theabramslawfirm.com

Attorney for Plaintiff

6 Eighth Judicial District Court

Family Division

7 Clark County, Nevada

8 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D

9 Plaintiff,) Department: I

10 vs.)

11 CHALESE MARIE SOLINGER,)

12 Defendant.)

13
14 **STIPULATION AND ORDER MODIFYING TIMESHARE**

15 **COME NOT THE PARTIES**, Plaintiff, ADAM MICHAEL
16 SOLINGER (hereinafter referred to as "Adam"), by and through his
17 attorney of record, VINCENT MAYO, ESQ., and Defendant, CHALESE
18 MARIE SOLINGER (hereinafter referred to as "Chalese"), by and
19 through her attorney of record, LOUIS C. SCHNEIDER, ESQ., and
20 hereby agree to the following:

21 ///

1 **WHEREAS** the parties have agreed to modify their temporary
2 custodial timeshare;

3 **WHEREAS** the new timeshare has been in effect since March 24,
4 2019; and

5 **WHEREAS** the parties' new custodial timeshare is in the child's
6 best interest but without prejudice.

7 **NOW THEREFORE**, in consideration of the aforementioned,

8 **IT IS HEREBY STIPULATED AND AGREED** that effective
9 immediately, the parties adopt the following temporary 2/2/3 weekly
10 timeshare, which will replace the 4/3/3/4 timeshare ordered by the
11 court on March 19, 2019: Week One: Adam has the children from
12 Monday after school through Wednesday after school/daycare. Chalese
13 has the children from Wednesday after school/daycare through Friday
14 after school/daycare. Adam has the children from Friday after
15 school/daycare through Monday after school/daycare. Week Two:
16 Chalese has the children from Monday after school/daycare through
17 Wednesday after school/daycare. Adam has the children from
18 Wednesday after school/daycare through Friday after school/daycare.
19 Chalese has the children from Friday after school/daycare through
20 Monday afterschool/daycare.

21

1 IT IS FURTHER STIPULATED AND AGREED that for
2 purposes of tracking whose time it is, Week One will be considered to
3 have commenced on April 8, 2019.

4 THE ABRAMS & MAYO LAW
FIRM

LAW OFFICE OF LOUIS C.
SCHNEIDER

6 Vincent Mayo, Esq.
Nevada State Bar Number: 8564
7 6252 S. Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
8 Tel: (702) 222-4021
Fax: (702) 248-9750
9 Attorney for Plaintiff


Louis C. Schneider, Esq.
Nevada State Bar Number: 9683
430 South Seventh Street
Las Vegas, Nevada 89101
Tel: (702) 435-2121
Fax: (702) 431-3807
Attorney for Defendant

10 **ORDER**

11 **THEREFORE**, based upon the stipulation of the parties and for
12 good cause,

13 **IT IS HEREBY ORDERED SO ORDERED.**

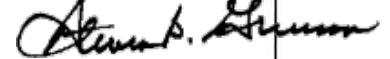
14 Dated this 17 day of April, 2019.

15 
DISTRICT COURT JUDGE Q/CW

16 Respectfully Submitted:

17 THE ABRAMS & MAYO LAW FIRM

18
19 Vincent Mayo, Esq.
Nevada State Bar Number: 8564
20 6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
21 Attorney for Plaintiff



ORDR

Vincent Mayo, Esq.
Nevada State Bar Number: 8564
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
Email: VMGroup@theabramslawfirm.com
Attorney for Plaintiff

Eighth Judicial District Court
Family Division
Clark County, Nevada

ADAM MICHAEL SOLINGER,)	Case No.: D-19-582245-D
)	
Plaintiff,)	Department: I
vs.)	
)	Date of Hearing: March 19, 2019
CHALESE MARIE SOLINGER,)	Time of Hearing: 3:30 p.m.
)	
Defendant.)	

ORDER AFTER HEARING OF MARCH 19, 2019

This matter coming on for hearing on the on the 19th day of March 2019, before the Honorable Cheryl B. Moss, upon Defendant's *Motion to set Aside Default; for Exclusive Possession of the Marital Residence and Ordering Plaintiff to Assist in Making Mortgage Payments; for Medical Legal Custody of the Minor Children, for an Order Referring the Parties to Mediation Pursuant to EDCR 5.70, for an Order Awarding Plaintiff Child Support; for an Order Awarding Plaintiff Alimony; and for Attorney's Fees and Costs and Plaintiff's Opposition to Amended*

1 *Motion to set Aside Default; for Exclusive Possession of the Marital*
2 *Residence and Ordering Plaintiff to Assist in Making Mortgage*
3 *Payments; for Medical Legal Custody of the Minor Children, for an*
4 *Order Referring the Parties to Mediation Pursuant to EDCR 5.70, for*
5 *an Order Awarding Plaintiff Child Support; for an Order Awarding*
6 *Plaintiff Alimony; and for Attorney's Fees and Costs and*
7 *Countermotion for Joint Legal Custody, Primary Physical Custody to*
8 *Plaintiff and Supervised Visitation to Defendant; to Establish Child*
9 *Support; to Establish Payment of Marital Expenses for an Order*
10 *Protecting the Parties' Community Property; Defendant to Obtain*
11 *Employment and to Cooperate in a Vocational Assessment, with*
12 Plaintiff, ADAM MICHAEL SOLINGER (hereinafter referred to as
13 "Adam"), having appeared personally and by and through his attorney of
14 record, VINCENT MAYO, ESQ., of THE ABRAMS & MAYO LAW FIRM,
15 and Defendant, CHALESE MARIE SOLINGER (hereinafter referred to
16 as "Chalese"), having appeared personally and by and through her
17 attorney of record, LOUIS C. SCHNEIDER, ESQ., or LAW OFFICE OF
18 LOUIS C. SCHNEIDER and the Court having listened to the
19 representations and arguments of counsel, and good cause appearing:

20 **IT IS HEREBY NOTED** that both Counsel represent that each
21 party has appropriate living conditions for the children. Video time

1 index 9:41:42 to 9:42:08.

2 **IT IS FURTHER NOTED** that Attorney Schneider represented
3 that from the \$7,500.00 withdrawn by Chalese from the parties'
4 account, \$2,500.00 was given to Ed Kainen and \$5,000.00 was given to
5 Mr. Schneider's office for attorney's fees. Video time index 10:15:42 to
6 10:16:06.

7 **IT IS FURTHER NOTED** that Chalese represented she has quit
8 using marijuana and Adam represents he does not use marijuana. Video
9 time index: 9:36:11 to 9:36:17.

10 **IT IS HEREBY ORDERED** that the parties are awarded on a
11 temporary basis joint legal and joint physical custody of the minor
12 children. Video time index 10:40:52 to 10:40:56.

13 **IT IS HEREBY ORDERED** that the parties shall follow a 4-3-3-
14 4 schedule, consisting of the following: Week 1 shall be defined as
15 Chalese having the children from Sunday at 6:00 p.m. through Thursday
16 at 6:00 p.m. and Adam having the children from Thursday at 6:00 p.m.
17 through Sunday at 6:00 p.m. Week 2 shall be defined as Chalese having
18 the children from Sunday at 6:00 p.m. through Wednesday at 6:00 p.m.
19 and Adam having the children from Wednesday at 6:00 p.m. through
20 Sunday at 6:00 p.m. Video time index 10:39:42 to 10:39:47. Week 1 shall
21 commence on Sunday, March 24th. The receiving parent shall pick-up

1 the children. Video time index 10:39:42 to 10:39:47. The exchanges shall
2 take place at the non-receiving parent's residence, curbside, with the
3 parties utilizing the text/honk and seat-belt rule. Video time index
4 10:40:56 to 10:41:01. The parties may video record each other in person.
5 Video time index 10:41:29 to 10:41:37.

6 **NOTICE IS HEREBY GIVEN** that the parties are subject to the
7 following provisions:

8 1. The parties are subject to the provisions of NRS 125C.0065
9 which provides:

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

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

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

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:

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

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

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

1 2. The parties are subject to the provisions of NRS 125.510(6),
2 which provides:

3 PENALTY FOR VIOLATION OF ORDER: THAN ABDUCTION,
4 CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION
5 OF THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY
AS PROVIDED IN NRS 193.130.

6 3. The parties are subject to the provisions of NRS 200.359
7 which provides that every person having a limited right of custody to a
8 child or any parent having no right of custody to the child who willfully
9 detains, conceals or removes the child from a parent, guardian or other
10 person having lawful custody or a right of visitation of the child in
11 violation of any order of this court, or removes the child from the
12 jurisdiction of the court without the consent of either the court or all
13 persons who have the right to custody or visitation is subject to being
14 punished for a category D felony as provided in NRS 193.130.

15 4. Pursuant to NRS 125.510(7) and (8), the terms of the Hague
16 Convention of October 25, 1980, adopted by the 14th Session of the
17 Hague Conference on Private Internal Law, apply if a parent abducts or
18 wrongfully retains a child in a foreign country. For the purposes of
19 applying the terms of the Hague Convention, the State of Nevada, United
20 States of America, is the habitual residence of the minor child.

21 ///

1 5. Under the terms of the Parental Kidnapping Prevention Act,
2 28 U.S.C. Sec. 1738A, and the Uniform Child Custody Jurisdiction and
3 Enforcement Act, NRS 125A.005 *et seq.*, the courts of Nevada have
4 exclusive modification jurisdiction of the custody, visitation and child
5 support terms relating to the child at issue in this case so long as either
6 of the parties, or the child, continue to reside in this jurisdiction.

7 **IT IS FURTHER ORDERED** that the Partial Parenting
8 Agreement reached at FMC between the parties regarding joint legal
9 custody, holidays and vacations is attached hereto as Exhibit "1" and
10 fully incorporated into this order as if set forth herein.

11 **IT IS FURTHER ORDERED** that both parties are referred to
12 the American Toxicology Institute (ATI) for drug testing to include hair
13 and urine. Each party shall bear their own fees. The referral was left-side
14 filed. Counsel may obtain the results by contacting Department I. Video
15 time index: 9:37:02 to 9:37:21.

16 **IT IS FURTHER ORDERED** that Chalese is referred to the
17 American Toxicology Institute (ATI) for one (1) random drug test 90
18 days after today's date, which will be on or after June 20, 2019, to
19 include hair and urine. Adam or his counsel shall give notice to Chalese
20 or her counsel as to when she needs to go in for testing in June, with
21 Chalese going to test the same day and with Adam paying. Video time

1 index 9:47:07 to 9:47:16; 9:48:48 to 9:49:41. Adam shall bear the cost of
2 such test. The referral was left-side filed.

3 **IT IS FURTHER ORDERED** that neither party shall use
4 marijuana. Further, neither party shall consume alcohol 24 hours prior
5 to and during their custodial timeshare with the children. Video time
6 index 9:48:31 to 9:48:47.

7 **IT IS FURTHER ORDERED** that both parties shall child proof
8 their residences and keep their homes in a habitable living condition.
9 Video time index 9:41:42 to 9:42:08 and 9:53:12 to 9:53:31.

10 **IT IS FURTHER ORDERED** that the parties have an agreement
11 to change the school/daycare to a more affordable one. Video time index
12 9:33:59 to 9:34:19.

13 **IT IS FURTHER ORDERED** that each party shall take a UNLV
14 high conflict parenting class, without prejudice, Adam shall pay for the
15 classes. Chalese shall take the class first and once she completes it, Adam
16 shall take the class. Video time index 9:54:35 to 9:56:10.

17 **IT IS FURTHER ORDERED** that based on Adam's gross
18 income as represented and pursuant to NRS 125B.070, Adam shall pay
19 Chalese temporary child support for the two minor children in the
20 amount of One Thousand Nine Hundred Ninety Dollars (\$1,990.00) per
21 month. Video time index 9:59:01 to 9:59:17; 10:29:55 to 10:29:57.

1 **NOTICE IS HEREBY GIVEN** that the parties are subject to the
2 following statutory provisions:

3 1. Pursuant to NRS 125B.145, an award of child support shall
4 be reviewed by the court at least every three (3) years to determine
5 whether the award should be modified. The review will be conducted
6 upon the filing of a request by (1) a parent or legal guardian of the child;
7 or (2) the Nevada State Welfare Division or the District Attorney's
8 Office, if the Division of the District Attorney has jurisdiction over the
9 case.

10 2. Pursuant to NRS 125.450(2), the wages and commissions of
11 the parent responsible for paying support shall be subject to assignment
12 or withholding for the purpose of payment of the foregoing obligation of
13 support as provided in NRS 31A.020 through 31A.240, inclusive.

14 3. Pursuant to NRS 125.130 the social security numbers of the
15 parties shall be provided on a separate form to the Court for the Welfare
16 Division of the Department of Human Resources within ten days from
17 the date this Decree is filed. Such information shall be maintained by the
18 clerk in a confidential manner and not be a part of the public record.

19 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**
20 that the parties will submit the information required in NRS 125B.055,
21 NRS 125.130, and NRS 125.230, on a separate form, to the court and the

1 Welfare Division of the Department of Human Resources, within ten
2 (10) days from the date this Decree is filed. Such information will be
3 maintained by the clerk in a confidential manner and not part of the
4 public record. The parties will update the information filed with the
5 court and the Welfare Division of the Department of Human Resources
6 within ten (10) days should any of that information become inaccurate.

7 **IT IS FURTHER ORDERED** that the claim of constructive
8 arrears is deferred. Video time index 10:11:53 to 10:12:01; 10:16:51 to
9 10:17:22.

10 **IT IS FURTHER ORDERED** that the children shall be kept on
11 their current health insurance coverage. Any unreimbursed/uncovered
12 out of pocket medical, dental, optical, orthodontic or other health related
13 expense incurred for the benefit of the minor child/children is to be
14 divided equally between the parties with out of pocket unreimbursed /
15 uncovered health expenses paid pursuant to the 30/30 Rule. Video time
16 index 10:11:47 to to 10:11:52. The 30/30 Rule holds that either party
17 incurring an out of pocket medical expense for the child/children shall
18 provide a copy of the paid invoice/receipt to the other party within thirty
19 days of incurring such expense, if not tendered within the thirty-day
20 period, the Court may consider it as a waiver of reimbursement. The
21 other party will then have thirty days from receipt within which to

1 dispute the expense in writing or reimburse the incurring party for one-
2 half of the out of pocket expense, if not disputed or paid within the
3 thirty-day period, the party may be subject to a finding of contempt and
4 appropriate sanctions.

5 **IT IS FURTHER ORDERED** that Chalese shall obtain
6 employment within three months. If she does not, she shall commence
7 keeping a diary of her employment attempts, which shall consist of at
8 least three (3) attempts per day. Once Chalese obtains employment, she
9 shall notify Adam with her date of hire, pay structure, etc. Video Time
10 Index 9:39:10 to 9:39:44. Once Chalese obtains employment, the family
11 support order will be reassessed with Adam filing a supplemental
12 motion. Video time index 10:05:35 to 10:05:39; 10:05:48 to 10:06:02.

13 **IT IS FURTHER ORDERED** that the parties shall be equally
14 responsible for one-half of the monthly mortgage on the 8500 Highland
15 View Avenue residence, in the total amount of One Thousand Three
16 Hundred Twenty Dollars (\$1,320.00) per month, with each side being
17 responsible for \$660.00 per month. Video time index 10:30:01 to
18 10:30:04; 10:34:52 to 10:34:57.

19 **IT IS FURTHER ORDERED** that Chalese shall be responsible
20 for the following monthly expenses, commencing April 1, 2019:
21 Electricity, water, gas, sewer and internet on the 8500 Highland View

1 Avenue residence, gas for a vehicle, groceries and other discretionary
2 expenses. The parties shall coordinate with transferring the utilities into
3 Chalese's name. Video Time Index: 10:34:52 to 10:35:55; 10:06:52 to
4 10:07:16.

5 **IT IS FURTHER ORDERED** that the parties shall place the
6 marital residence on the market for sale. Adam shall choose three (3)
7 realtors within one (1) week and Chalese shall choose one (1) name
8 within the following week. Chalese shall keep the property in sale
9 condition. If the parties cannot agree with a sales price after conferring
10 with the realtor, the court shall decide, as well as any reduction in price.
11 The proceeds from the sale of the home shall be placed in Attorney
12 Mayo's trust account. Video time index 10:00:02 to 10:00:44; 10:03:50
13 to 10:04:51; 10:12:31 to 10:12:39.

14 **IT IS FURTHER ORDERED** that Adam may at random, and
15 not when Chalese is asleep, request Chalese perform a walk-through of
16 Chalese's house when she is at home by requesting same from Chalese
17 once every two (2) months, which shall occur during May 2019, July
18 2019, and September 2019. Chalese shall respond with a video to Adam
19 within three (3) hours of said request. Video time index 9:51:00 to
20 9:52:52.

21 ///

1 **IT IS FURTHER ORDERED** that Chalese shall neatly place all
2 of Adam's clothing, shoes, belts, toiletries, etc., in boxes for him to pick
3 up. Video time index 9:51:42 to 9:51:47.

4 **IT IS FURTHER ORDERED** that neither party is to sell,
5 transfer or convey any property at the 8500 Highland View Avenue
6 residence as the Joint Preliminary Injunction is in effect. Video time
7 index 9:43:14 to 9:43:37.

8 **IT IS FURTHER ORDERED** that Adam shall hire a repair
9 person to obtain a repair estimate related to the water leak at the 8500
10 Highland View Avenue residence. Adam shall obtain a repair person to
11 fix the water leak in the marital residence. If Adam has to front the bill,
12 he shall save his bill and the court will consider reimbursement for half
13 of the bill from the proceeds of the sale of the marital residence. Video
14 time index 10:08:58 to 10:11:15.

15 **IT IS FURTHER ORDERED** that both counsel and/or their
16 assistant will schedule a video walk through of the marital residence for
17 purposes of Adam inventorying the contents prior to division of the
18 marital furniture, furnishings, electronics, kitchenware, linens, etc. Both
19 counsel can be present during the walkthrough or send a representative
20 from their office. Counsel shall coordinate with the parties as to same.
21 Video time index 10:19:29 to 10:20:06.

1 **IT IS FURTHER ORDERED** that the artwork shall be appraised
2 during the video walk through of the residence. Without prejudice,
3 Adam shall pre-pay for the appraiser. Chalese shall allow access to the
4 house, which can be done at the same time video walk-through inventory
5 occurs. Video time index 10:20:31 to 10:21:23.

6 **IT IS FURTHER ORDERED** that if Adam's father permits the
7 parties to continue to use his truck, Chalese shall be the only person to
8 drive the truck. Josh Lloyd shall not drive the truck or the children in
9 any other vehicle. Video time index 9:45:42 to 9:45:45. Further,
10 Chalese's significant other shall not be left alone with the children or
11 babysit them. Video time index 9:45:46 to 9:45:59.

12 **IT IS FURTHER ORDERED** that Adam shall keep Chalese on
13 his health insurance until the divorce is finalized. Chalese shall begin
14 looking for private health insurance or insurance through an employer.
15 Video time index 10:11:35 to 10:11:45.

16 **IT IS FURTHER ORDERED** that the parties are referred to the
17 Settlement Master's program. The Court encourages parties to choose a
18 Settlement Master from the Court's approved list. Video time index
19 10:17:52 to 10:19:01.

20 ///

21 ///

1 **IT IS FURTHER ORDERED** that the parties are issued a
2 Mutual Behavior Order. There shall be no posting on social media. Order
3 signed and filed in open Court. Video time index 10:41:45 to to 10:41:52.

4 **IT IS FURTHER ORDERED** that Calendar Call is set for
5 September 9, 2019 at 9:00 a.m. Discovery closes at Calendar Call. Pre-
6 Trial Memos along with the final List of Witnesses and List of Exhibits
7 are due on or before Calendar Call. Exhibit notebooks are to be provided
8 to the Court three days prior to trial. Video time index 10:32:34 to
9 10:33:25.

10 **IT IS FURTHER ORDERED** that Evidentiary Hearing
11 regarding Custody (Stack #1) is set for day 1 on October 9, 2019 at 9:00
12 a.m. and day 2 on October 10, 2019 at 9:00 a.m. Video time index
13 9:31:46 to 9:32:06.

14 **IT IS FURTHER ORDERED** that Case Management Order
15 signed and filed in open Court.

16 **IT IS FURTHER ORDERED** that attorney's fees is deferred
17 until the time of the selling of the 8500 Highland View Avenue
18 residence. Video time index 10:14:50 to 10:14:55.

19 **IT IS FURTHER ORDERED** that the issue of reimbursement to
20 Adam of Adam's half of the \$7,500 in attorney's fees withdrawn by
21 Chalese, with half being \$3,750, is reserved. Video time index 10:16:12

1 to 10:16:20.

2 **IT IS FURTHER ORDERED** that Attorney Mayo shall prepare
3 the Order from today's hearing; Attorney Schneider shall review and
4 countersign. Video time index 10:42:01 to 10:42:09.

5 Dated this day of , 2019.

MAY 02 2019

6 
DISTRICT COURT JUDGE

7
8 Respectfully Submitted:

Approved as to form and content:

9 THE ABRAMS & MAYO LAW
10 FIRM

LAW OFFICE OF LOUIS C.
SCHNEIDER

11
12 
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