

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 5**

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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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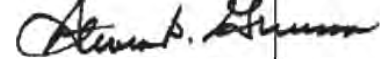
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11/02/2022	Transcript from April 14, 2022 Hearing (Trial Decision)	22	4771 - 4791
11/02/2022	Transcript from January 21, 2022 Evidentiary Hearing (Trial Day 2)	19	3994 - 4155
11/02/2022	Transcript from March 1, 2022 Evidentiary Hearing (Trial Day 3)	20	4156 - 4402
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



EXH

Vincent Mayo, Esq.
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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.)	

**APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFF'S
RESPONSE IN SUPPORT OF OPPOSITION TO DEFENDANT'S
MOTION FOR TEMPORARY SPOUSAL SUPPORT AND
PRELIMINARY FEES AND COSTS**

Exhibit	Description
3	October 2 nd texts between Chalese and Carmen
4	Message exchanges between the parties regarding Michael's speech therapy
5	Messages between the parties regarding soccer and speech therapy for Michael
6	Message from Chalese to Adam regarding bank statements
7	Message from Chalese to Adam asking about Adam's drone

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8	Letter from Attorney Mayo to Attorney Fleeman dated October 22, 2019
---	---

Dated Tuesday, November 12, 2019.

Respectfully Submitted,
THE ABRAMS & MAYO LAW FIRM

/s/ Vincent Mayo, Esq.
Vincent Mayo, Esq. (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 IN SUPPORT OF PLAINTIFF'S RESPONSE IN SUPPORT OF OPPOSITION TO DEFENDANT'S MOTION FOR TEMPORARY SPOUSAL SUPPORT AND PRELIMINARY FEES AND COSTS* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Tuesday, November 12, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Bruce I. Shapiro, Esq.
Attorney for Defendant

/s/ Chantel Wade
An Employee of The Abrams & Mayo Law Firm

EXHIBIT 3

EXHIBIT 3

EXHIBIT 3



Bluetooth, signal strength, LTE, 4%, and 10:19 PM



Chalese

11:26 AM, Oct 2



(No subject)

I'm going to be honest and straight forward. My ex is doing anything and everything in his power to take my kids away from me. During this divorce, my old attorneys office stumbled upon Adam's stash of child pornography. Since then, Adam has been trying to hurt me by taking my kids before this comes out. He is being investigated and so is his electronics. Right now, they are after josh. They want him and his past to ruin any chance of me having any custody of my kids. Listen, everyone has a past, some worse than others but when people are making efforts and taking the correct steps to better themselves and their lives they deserve that. I've been with and around monstrous people. Me and my kids feel completely safe because of josh. I have been harassed, stalked, ran off the road, and have been made out to be a horrible mother. But the reality is I'm just trying to survive and make it through this shit storm Adam created. Honestly, up until he left, I was under the impression that I had a perfect marriage. Then it came out he has been having multiple affairs with hookers and prostitutes and has been planning this since before I got pregnant with my son. I've just about reached my limit



Bluetooth, Airplane Mode, LTE, 4% battery, 10:19 PM

< Chalese



12:48 PM



We were playing with balloons and the kids were sitting on them and bouncing on them and hers popped and so did my sons. They both landed on their butts hard on the concrete patio.

12:49 PM

Cause im not im confused



Ok i was like arielle popped what

12:49 PM



I often bring balloons home from work for the kids

12:49 PM

And when she didnt answer i left it alone



12:49 PM



I've got a whole bucket lol



Enter message



000977



Bluetooth, Airplane Mode, LTE, 2% battery, 10:28 PM

< Chalese



C

Josh isn't a pedophile though...I physically get sick knowing That I have to send my kids with someone so mentally ill. I'm down to 87 lbs because of the stress

12:44 PM

C

I have to meet with my attorney after court tomorrow, you're more than welcome to come along since you've been brought into this and talk to him about it all

12:45 PM

12:46 PM

There is one thing though that we need to discuss cause its major and I'm not sure what arielle meant when she said it to me



C

What's that?

12:46 PM

12:46 PM

I wont talk to josh cause he will just talk shit to me and literally i have no idea what she meant



C

Ok, I won't mention it to him

12:47 PM

12:47 PM

And please know im not saying anything bad i been wanting to ask



Enter message



000978



Bluetooth, Airplane Mode, LTE, 4% battery, 10:19 PM

< Chalese



VIEW ALL



MMS
11:26 AM

C

He's taken everything away from me. My vehicle, my house, my savings, my dogs, and now he's going after my kids. He doesn't love them and I fully believe he would put them in harms way just to get ahead in life

11:28 AM

C

He's paid over \$20k in having me followed by a private investigator, has broken into my house, has had his friends do the same.

11:29 AM

C

I don't normally share all of this information with people but you deserve to know why you are being brought into this. He doesn't care about his kids, or anyone else but himself. I was with him for over 10 years

11:32 AM

11:49 AM

Im reading it all now ill message shorty kk



12:34 PM

I understand but i dont get why they didnt remove kids for that



Enter message





Bluetooth, Wi-Fi, LTE, 4% battery, 10:21 PM



Chalese



12:37 PM, Oct 2

Because he's trying to say I put it there. So before anything can happen they need to prove the dates that the images and videos were saved. My last attorney did absolutely nothing to help my case so my new attorney needs to do things by the book. I just paid \$5k last week to the forensics experts to confirm all of this. Once it's confirmed the the proper authorities will get involved but we don't know how long that will be. They want you there to bash josh and say how terrible of a person and father he is proving me being a bad mother. All of your records are public, everything in mine is sealed. The only reason you are being called is to testify against josh



josh



5:00 AM

Legally if your not served 14 days before trial you dont have to go. Courts on the 10th and 11th which makes it too late for them to serve you.

They are trying to take the kids away from chalese blaming me because I got arrested before jesse was born.

Do what you want I'm gonna be leaving town were gonna have to figure out if I get arielle summers or not

EXHIBIT 4

EXHIBIT 4

EXHIBIT 4



8/19/2019

Chalese Anderson on 8/19/2019 7:06PM said:

When can I talk to my kids

8/20/2019

Adam Solinger on 8/20/2019 2:32PM said:

How dare you delay Maq getting back into speech therapy! Why on earth would you not tell me the pediatrician wanted him to come back in before she would write the order. When were you planning on saying something? What you're doing is actively harming the children and frankly disgusting.

Chalese Anderson on 8/20/2019 2:39PM said:

What's disgusting is the way you speak to me. I just talked to them on Friday and told them we had both moved from that side of town and I was looking for a pediatrician closer for us. Don't you for a second ever accuse me of delaying anything or harming my children! How dare you!

Adam Solinger on 8/20/2019 3:02PM said:

You knew he had an appointment. I told you. You knew he needed that order. You didn't say a SINGLE word about it. You were going to let Maq show up to the appointment we prepped him for and that he was looking forward to without any warning? Thankfully they were able to squeeze him in today so at least he could see his pediatrician and his speech appointment rescheduled for next week at the same time.



want to do it. The kids will FaceTime when Maq finishes his bath.

Chalese Anderson on 9/20/2019 7:26PM said:

Marie got a bath, maqs just didn't happen this time. I work with him, thank you. Please keep your parenting opinions to yourself

Adam Solinger on 9/20/2019 7:44PM said:

I'm trying to coparent. What do you mean it didn't happen? You had him for two days. How does it not happen? How does Marie always have diaper rash when I get her back? Always. You are not working with Maq with his words because he told me when I asked how practicing his words went. He said mommy doesn't have that game. When I asked about the sheets I sent you he said that mommy didn't do those. Please stop holding back the children, to include potty training with Marie. She's always in diapers when I FaceTime. It sends a confusing signal to her. Diapers should only be worn for bed and nap.

Chalese Anderson on 9/20/2019 7:54PM said:

Just because I don't use the same methods as you doesn't mean I don't work with him

Chalese Anderson on 9/20/2019 7:57PM said:

And you can't expect the same result for potty training at two different houses with different schedules. I've done



extensive reading on it, maybe it would be beneficial if you did the same

Adam Solinger on 9/20/2019 7:58PM said:

These are the sheets the speech therapist provided. This is what she says he needs to work on. It's what's in his best interest. It's funny how she never has diaper rash with me but always has it when she comes back from you. If you were potty training her, she wouldn't have diaper rash.

Chalese Anderson on 9/20/2019 8:00PM said:

Once again, your opinion. Have a great night! I'll be calling tomorrow at 7pm, please plan accordingly

Adam Solinger on 9/20/2019 8:46PM said:

As you know, sometimes it doesn't happen according to plan.

9/21/2019

Adam Solinger on 9/21/2019 1:11PM said:

Did Marie fall down the stairs or something? She has two healing bruises on her face. One on the hair line and one on her cheek. I noticed them healing kind of greenish today. Just wanting to know what happened.

Chalese Anderson on 9/21/2019 1:12PM said:

No she didn't fall down the stairs.



Adam Solinger on 9/28/2019 12:07PM sent:

(See attached on page 321)

Adam Solinger on 9/28/2019 12:09PM said:

These are the sheets he needs to work on daily from the speech doctor.

Adam Solinger on 9/28/2019 12:11PM said:

Also, to give you a heads up, he has went to speech therapy 4 times. I haven't received a bill for any of the sessions but I should be getting it soon. I'm not sure how much insurance will cover as of yet.

9/29/2019

Adam Solinger on 9/29/2019 3:17PM said:

Can I pick the kids up early at 430 to go fall clothes shopping with the kids?

Chalese Anderson on 9/29/2019 3:25PM said:

No. You can pick them up at 6.

Adam Solinger on 9/29/2019 3:40PM said:

Are you feeding them dinner before I pick them up?

Adam Solinger on 9/29/2019 5:50PM said:

I'm here.

Chalese Anderson on 9/29/2019 5:53PM said:

Ok. Marie is just finishing dinner and I'm getting their shoes



Adam Solinger on 9/29/2019 7:29PM said:

I can't stress the importance of Maq practicing his words every night. The speech therapist says we need to work on it consistently every night. Please spend the five minutes a night to practice. He specially made a point of saying you didn't practice with him because you didn't have the sheets.

Chalese Anderson on 9/29/2019 7:31PM said:

I didn't go off of the sheets. But, I assure you, we practiced the words necessary in normal and reparative conversation

Adam Solinger on 9/29/2019 7:34PM said:

Well you doing whatever you think is best for his speech since January has only served to further delay his speech. Let's do what the professionals tell us to work on for his speech. We always practice regular words. That's not practicing. There's specific sounds he needs help with and that's what those sheets are designed for.

Adam Solinger on 9/29/2019 8:04PM said:

Oh, and thank you for sending her back with diaper rash yet again.

Chalese Anderson on 9/29/2019 8:05PM said:

She only has a diaper on if she's having multiple accidents in a row. It will take some time for her to get used to using the potty over here like she does at your youse



Attachment



Img. 309f8f16-802c-4e14-9111-85a8ae877d1f.HEIC to page 224



Attachment



Img. 8f46f8a7-ba20-4d7e-84d5-5e723975752b.HEIC to page 225



Adam Solinger on 10/1/2019 10:09PM sent:

(See attached on page 323)

Adam Solinger on 10/1/2019 10:09PM sent:

(See attached on page 324)

Adam Solinger on 10/1/2019 10:12PM said:

Clearly there was a problem because it doesn't show that you called. Plus you didn't send a message of any kind after you claim it wouldn't let you answer and you tried calling back.

Chalese Anderson on 10/1/2019 10:12PM said:

Cool story

10/2/2019

Adam Solinger on 10/2/2019 1:10PM said:

FYI, I got a call from the speech therapy place that Maq was on the waitlist for and they're able to get him in today for the evaluation.

Chalese Anderson on 10/2/2019 6:02PM said:

I'm outside

Adam Solinger on 10/2/2019 7:15PM said:

These are the words from the doctor this week.

Adam Solinger on 10/2/2019 7:15PM sent:

(See attached on page 325)



Adam Solinger on 10/2/2019 7:16PM sent:

(See attached on page 326)

Adam Solinger on 10/2/2019 7:16PM sent:

(See attached on page 327)

10/3/2019

Chalese Anderson on 10/3/2019 3:53PM said:

I am sick and throwing up. Is there a way you'd let me have a makeup day if I asked you to pick them up today?

Adam Solinger on 10/3/2019 4:06PM said:

If you're sick and throwing up, I will happily pick up the kids. I cannot agree to a make up day.

Chalese Anderson on 10/3/2019 4:07PM said:

Why not?

Adam Solinger on 10/3/2019 4:11PM said:

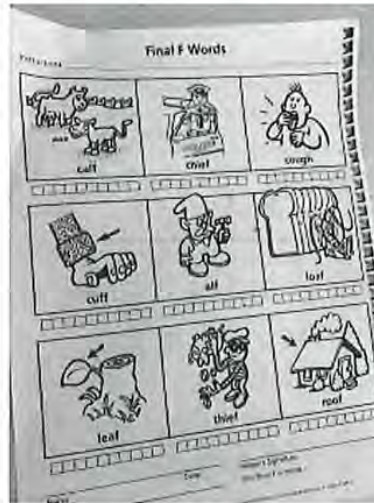
Because I think you're a danger to the kids and I won't agree to you getting anymore time than ordered with the kids.

Chalese Anderson on 10/3/2019 4:12PM said:

Then I'll go pick them up and give them extra vitamins and hope they don't catch this



Attachment



Img. 5ecdd2f9-b6f9-4a3c-b62a-3a87f257a5a5.HEIC to page 229

Attachment



Img. d5cbade3-021f-4e87-97fd-4de5b73376fe.HEIC to page 230



Attachment



Img. 0c6c0688-69ff-4586-a688-f07bcd02510c.HEIC to page 230



Adam Solinger on 10/14/2019 8:04PM said:

We tried to give her the phone. She screamed and said no.
We tried again. She screamed again while throwing the
phone at Maq.

Chalese Anderson on 10/14/2019 8:07PM said:

You haven't let me talk to her the past couple nights

Adam Solinger on 10/14/2019 8:11PM said:

Last night she went to bed early because she was worn out
from the day. It has nothing to do with me not letting you.
Tonight we tried to and she refused, it has nothing to do
with me not letting you. What would you like me to do?
Restrain her and put the phone in front of her face? How do
you propose I have her talk to you when she screams and
throws the phone? I'm open to options but I can't let her
throw and possibly break an expensive phone and hurt Maq
in the meantime.

10/16/2019

Chalese Anderson on 10/16/2019 12:57PM said:

Please leave them at daycare for me to pick up today

Adam Solinger on 10/16/2019 1:42PM said:

They will not be in day care for pick up. Maq has speech
therapy with his new speech therapist at 5. They just
confirmed the appointment late yesterday. I told the kids we
would pick them up after nap so that I could practice his
word worksheets from Margo with him since you don't want



to work on the words prescribed to him by the speech therapist and instead want to work on whatever words you think are appropriate. This way I can ensure he only ever misses 1 day of practice. I'm always going to pick the kids up to spend time with them if I'm able to rather than leaving them in day care. Especially because the learning portion of the day is done in Pre-K shortly after nap and it's just free play. I'm not sure why you insist on trying to dictate the time I get to spend with the kids. Please stop asking that I leave them in day care.

Chalese Anderson on 10/16/2019 1:43PM said:

I ask that you leave them at daycare because it makes pickups easier. My time starts at 6pm. Both kids need to be ready to be picked up. Please stop diminishing me as their mother and respect my time

Chalese Anderson on 10/16/2019 1:43PM said:

We have plans tonight that I made over two weeks ago that cannot be changed

Adam Solinger on 10/16/2019 1:45PM said:

Both kids will be ready at 6 when your time starts, just like they always are. Whether they're at day care or with me, that doesn't "diminish" your time. Stop trying to create a false narrative.

Chalese Anderson on 10/16/2019 1:56PM said:

No false narrative on my part.



Adam Solinger on 10/16/2019 2:55PM said:

You'll need to bring sheets for Marie for day care tomorrow.
She spilled water on it so I brought it home to dry. Also,
Friday is pink day for the kids.

Adam Solinger on 10/16/2019 3:04PM sent:

(See attached on page 329)

Adam Solinger on 10/16/2019 3:05PM sent:

(See attached on page 330)

Adam Solinger on 10/16/2019 3:05PM sent:

(See attached on page 331)

Adam Solinger on 10/16/2019 3:05PM sent:

(See attached on page 332)

Adam Solinger on 10/16/2019 3:05PM said:

These are his words he is working on that you can go over
with him tomorrow.

10/18/2019

Chalese Anderson on 10/18/2019 11:59AM said:

Just letting you know that I am aware Marie's shoes are too
big but she insisted on wearing them.

Adam Solinger on 10/18/2019 5:10PM said:

Where am I picking up the kids?



Chalese Anderson on 10/18/2019 5:11PM said:

Daycare

Adam Solinger on 10/18/2019 6:42PM said:

I can't reiterate enough how important it is to work with Maq on his words given how far behind he is. Also, please ensure both kids get baths. Maq said you tricked him and he didn't get a bath.

Chalese Anderson on 10/18/2019 6:43PM said:

Please make sure the kids are ready for my phone call at 7

Adam Solinger on 10/18/2019 6:48PM said:

They are currently eating if we don't answer they will call when they are done like the always do.

Adam Solinger on 10/18/2019 7:24PM sent:

(See attached on page 333)

Chalese Anderson on 10/18/2019 7:24PM said:

What happened?!

Adam Solinger on 10/18/2019 7:25PM sent:

(See attached on page 334)

Adam Solinger on 10/18/2019 7:25PM said:

You tell me. That's why I sent the pictures.



Attachment



Img. 283b1c4a-f7ea-4f3e-9e86-9c7f085d7cd0.HEIC to page 241



Attachment



Img. 2c79c136-aede-4d89-bf78-b12f854f2544.HEIC to page 241

Attachment



Img. 5a323dc8-81f0-4319-a69a-750c9f7c4241.HEIC to page 241



Attachment



Img. f6ddf597-42c2-41aa-9617-1841a44db841.HEIC to page 241



Chalese Anderson on 10/25/2019 7:24PM said:

I'm going to start heading over

Adam Solinger on 10/25/2019 7:25PM said:

On our way

Chalese Anderson on 10/25/2019 7:29PM said:

It'll take me longer to get there FYI

Adam Solinger on 10/25/2019 7:34PM said:

I'm on the 4th floor parking garage

10/26/2019

Adam Solinger on 10/26/2019 10:39AM sent:

(See attached on page 335)

Adam Solinger on 10/26/2019 10:39AM sent:

(See attached on page 336)

Adam Solinger on 10/26/2019 10:39AM sent:

(See attached on page 337)

Adam Solinger on 10/26/2019 10:39AM sent:

(See attached on page 338)

Adam Solinger on 10/26/2019 10:39AM sent:

(See attached on page 339)



Adam Solinger on 10/26/2019 10:40AM sent:

(See attached on page 340)

Adam Solinger on 10/26/2019 11:12AM sent:

(See attached on page 341)

Adam Solinger on 10/26/2019 12:49PM said:

How are the kids doing?

Chalese Anderson on 10/26/2019 12:58PM said:

They are doing great. Both are napping

Chalese Anderson on 10/26/2019 6:28PM said:

Marie is going to bed early. Would you like to call her?

10/27/2019

Adam Solinger on 10/27/2019 3:20PM said:

Are you feeding the kids dinner?

Adam Solinger on 10/27/2019 4:15PM said:

Can you please let me know so I can plan dinner accordingly?

Chalese Anderson on 10/27/2019 4:25PM said:

No. Dinner will not be ready by 6pm tonight for them to eat

Adam Solinger on 10/27/2019 5:56PM said:

I'm outside

[illegible]

Generated through AppClose Report Generator By: Adam Solinger on 11/7/2019 at 9:06AM Page 335 of 352

001005



Attachment



Img. 5d477bd6-7db6-426b-add2-5ba4ecc7c58c.HEIC to page 254

Attachment



Img. 1273a84b-1502-4079-81d7-6e120df191ac.HEIC to page 254

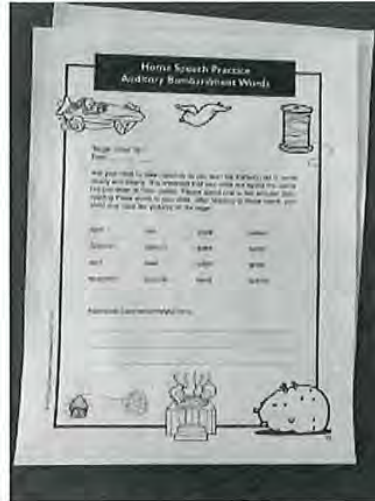
Attachment



Img. bbc0a37a-ca60-47ba-a78e-44b1ae2069f1.HEIC to page 254



Attachment



Img. b9f53d91-e758-4e22-8474-91f95cf7e2e7.HEIC to page 254



Attachment



Img. 66409acd-74b5-45f1-81c3-256e3e88bb38.HEIC to page 255



Attachment



Img. af765bf2-2971-4c42-be36-b1736699e33c.HEIC to page 255



AppClose®

Chalese Anderson on 10/27/2019 6:01PM said:

Please let Maq know I'll go get him more green apples for when he comes home next

Adam Solinger on 10/27/2019 8:20PM said:

I'm not sure why every week the same things have to be issues. Once again you didn't bathe the kids this weekend, they need to take baths, their hands alone made the water black from being so dirty. Brushing their teeth is also important, Marie has already lost 2 teeth she doesn't need to lose more. These are basic hygiene needs, you are their mom, you are supposed to be teaching them proper hygiene. It's simple, brush twice a day, floss and mouthwash for Maq. They enjoy baths and brushing their teeth so I don't understand why it's not being done at your house. Secondly, why are you refusing to go over the words/worksheets with Maq? This is what the speech therapist wants him working on, please stop purposely hindering his speech, you are his mom and should want him to succeed in every way possible, not hold him back. Finally, teaching Maq to call people names is unacceptable, he just went on and on about how you told him to call Jessica "old grandma". Why are you teaching him to be mean. Of all the things you should be teaching him; brushing teeth, bathing, and speech, name calling shouldn't be one of them.



Chalese Anderson on 10/27/2019 8:24PM said:

First, basic hygiene is more than taken care of, besides from the mouthwash. The kids were "praking" people by calling them old grandma and old grandpa.

Chalese Anderson on 10/27/2019 8:25PM said:

And they were on the trampoline and playing outside for about two hours, that's why their hands are dirty

Adam Solinger on 10/27/2019 8:39PM said:

Maq specifically said he didn't take a bath or brush his teeth at moms house. That he didn't do his words at moms house and that YOU specifically told him to call Jessica old grandma. When will you learn Chalese? I don't even have to ask Maq anything this kid volunteers all sorts of information constantly. Just like the special drink mommy had this weekend with her friend that he couldn't have any of because it was only for grown ups. Bathe the kids please, brush their teeth and practice his words with him, stop holding this poor kid back. Also, I would like to be part of their haircuts. Maq's is all choppy and uneven around the ears. It probably needs to be shaved, I'll see what the stylist says. They already said to let Marie's hair grow out before they fix it because they will have to cut it extremely short otherwise.

Chalese Anderson on 10/27/2019 8:40PM said:

Have a good night.



AppClose®

decided all on your own however long ago that you hate me and I'm terrible doesn't mean that I'm going to be the same towards you.

Adam Solinger on 10/28/2019 5:24PM said:

Let's talk about co-parenting, why aren't you practicing Maq's words with him?

Chalese Anderson on 10/28/2019 5:25PM said:

I am, just not showing him the sheets and we do it all throughout the day, we don't make a special time for it.

Adam Solinger on 10/28/2019 5:46PM said:

How can I co-parent with someone who has told me that she chooses not to do the sheets and just does everyday words. You constantly change your story. You have taken him to speech therapy and you know the practice they preach is to sit down 10-15 minutes and practice his words. Next co-parenting question, why aren't you bathing or brushing their teeth while they are with you?

Chalese Anderson on 10/28/2019 5:48PM said:

I am using the words on the papers and putting them into everyday sentences that we practice. I assure you, they get bathed and teeth brushed while at my house. Just as they always have. Our nighttime routine hasn't changed since Maq was 2.



Adam Solinger on 10/30/2019 5:57PM said:

Getting shoes on

10/31/2019

Adam Solinger on 10/31/2019 12:35PM said:

Can I FaceTime with the kids now because it's Halloween
and trick or treating tonight?

Chalese Anderson on 10/31/2019 12:45PM said:

Let me see if they are still awake

Adam Solinger on 10/31/2019 3:24PM sent:

(See attached on page 342)

Adam Solinger on 10/31/2019 3:24PM sent:

(See attached on page 343)

Adam Solinger on 10/31/2019 3:24PM sent:

(See attached on page 344)

Adam Solinger on 10/31/2019 3:24PM sent:

(See attached on page 345)

Adam Solinger on 10/31/2019 3:24PM sent:

(See attached on page 346)

Adam Solinger on 10/31/2019 3:24PM sent:

(See attached on page 347)



Adam Solinger on 10/31/2019 3:24PM sent:

(See attached on page 348)

Adam Solinger on 10/31/2019 7:21PM sent:

(See attached on page 349)

Adam Solinger on 10/31/2019 7:21PM said:

Can you please send me a picture of the kids trick or treating?

Adam Solinger on 10/31/2019 8:02PM said:

I would like to see them in their costumes, if they're not in bed already.

11/1/2019

Chalese Anderson on 11/1/2019 10:53AM sent:

(See attached on page 350)

Adam Solinger on 11/1/2019 11:12AM said:

Thank you. Where am I picking up the kids tonight?

Chalese Anderson on 11/1/2019 11:15AM said:

Daycare

Chalese Anderson on 11/1/2019 11:16AM said:

Marie has diarrhea FYI

Chalese Anderson on 11/1/2019 11:47AM sent:

(See attached on page 351)

AppClose Complete Record of Text Communication
Period: 4/30/2019 5:00PM to 11/30/2019 3:59PM
Requesting Party: Adam Solinger, signed up on 3/20/2019 2:11PM
Responding Party/Parties: Chalese Anderson, signed up on 3/22/2019 4:04PM,
Adam Solinger, signed up on 3/20/2019 2:11PM



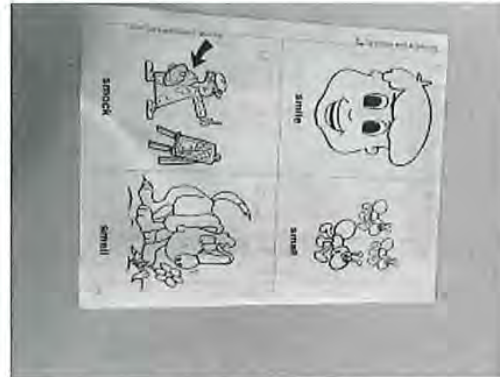
Attachment



Img. 644f1a16-0656-4185-96bb-2c0ce2c12310.HEIC to page 265



Attachment



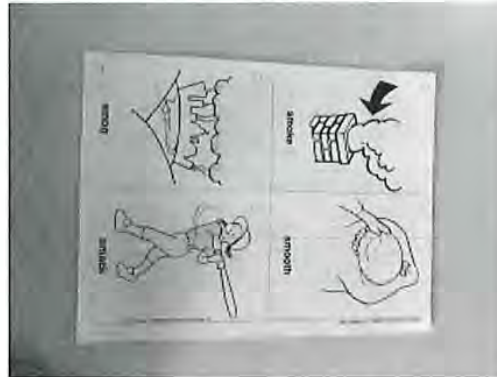
Img. 44decd35-a931-4417-8b4f-2c2ffbb163c1.HEIC to page 265

Attachment



Img. 88bf0cce-c77a-4062-a730-0876855f1695.HEIC to page 265

Attachment



Img. 139c0372-5850-4168-922a-796613626400.HEIC to page 265

AppClose Complete Record of Text Communication
Period: 4/30/2019 5:00PM to 11/30/2019 3:59PM
Requesting Party: Adam Solinger, signed up on 3/20/2019 2:11PM
Responding Party/Parties: Chalese Anderson, signed up on 3/22/2019 4:04PM,
Adam Solinger, signed up on 3/20/2019 2:11PM

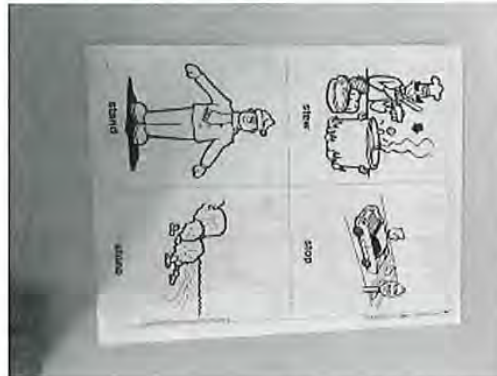


Attachment



Img. 3c87424d-cb9b-463d-8901-83b7095cf23c.HEIC to page 265

Attachment



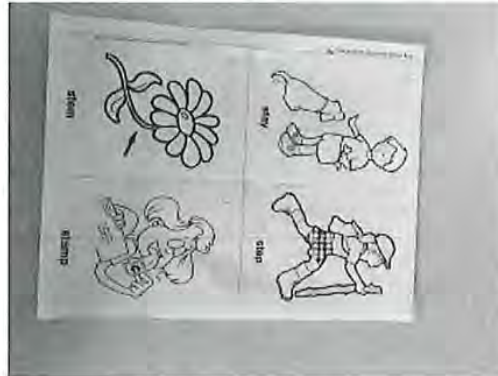
Img. a4802e3b-6e86-4e49-8cdc-12e3be3deab4.HEIC to page 265

Attachment



Img. 8e967c21-164d-4632-a599-9460217b0d65.HEIC to page 266

Attachment



Img. 706e74af-b966-4ad4-ab59-51e221dd3de3.HEIC to page 266



11/4/2019

Chalese Anderson on 11/4/2019 4:50PM said:

Can we please settle on 50/50? Christmas is coming up and I'd like to be able to provide a good holiday for the kids instead of putting all my extra money towards trial

11/5/2019

Adam Solinger on 11/5/2019 7:16PM said:

You already know my terms for settling. I'm being more than fair given historically the way you treat the kids and your continued disregard for the kids' safety and your constant neglect of the kids. You are the one who continued all of this and raising costs unnecessarily.

Adam Solinger on 11/5/2019 7:16PM sent:

(See attached on page 352)

Adam Solinger on 11/5/2019 7:16PM said:

Here is Maq's words for the week that he needs to practice daily. They SPECIFICALLY want him to say each word 20 times and focus on his mouth, they said he puts his tongue out while saying "s" making it sound like "th". They want this done in a sit down fashion going over the words like a classroom setting. This is why the did one sheet this time



Attachment



Img. c672ceda-b692-492e-848b-ef24bf9b9e37.HEIC to page 267

EXHIBIT 5

EXHIBIT 5

EXHIBIT 5



10/24/2019

Adam Solinger on 10/24/2019 6:42PM said:

I won't be available at 7 tonight. You'll have to call Jessica to talk to the kids.

Chalese Anderson on 10/24/2019 6:46PM said:

I'll note it in my logs

Adam Solinger on 10/24/2019 8:54PM said:

Isn't it already noted via my message? Maq has to change the day he goes to speech therapy because his therapist is leaving. He can either do Tuesday at 6 or Thursday at 6. If it was Thursday, you would obviously have to take him when you have him but it shouldn't be a problem because his new speech therapist is right by his day care. So you can pick Maq up and then take him. So do Thursday's work for you?

10/25/2019

Adam Solinger on 10/25/2019 8:52AM said:

There's a trunk or treat at the day care at 6 pm that Jessica and I wanted to take the kids to. However, I realize that's on your time. Is it ok if we take the kids to that at 6 and then you can pick them up there after they get to trunk or treat. Obviously you can be there too. We just didn't want to take them at 6 and then you pick them up and leave. I just don't want to get their hopes up and then let them down.



Adam Solinger on 10/25/2019 8:59AM said:

And what are your thoughts on Thursday for speech therapy?

Adam Solinger on 10/25/2019 9:08AM said:

I need an answer regarding speech therapy ASAP, they are temporarily holding the spots for me.

Chalese Anderson on 10/25/2019 9:17AM said:

I'll give you an answer in a bit

Chalese Anderson on 10/25/2019 9:19AM said:

That's fine for the trunk or treat. Josh and I will bring the other kids so they can partake as well

Adam Solinger on 10/25/2019 9:32AM said:

Maq and Marie will be in their costumes that I got them. Do you want to use the costumes I got them for Halloween or do you have other plans for their Halloween costumes? We would get no use out of them otherwise.

Chalese Anderson on 10/25/2019 9:53AM said:

They can wear them

Adam Solinger on 10/25/2019 10:00AM said:

Okay, so you will use them for Halloween? Also, I HAVE to let speech therapy know. Do Thursdays at 6 work or no?



Adam Solinger on 10/25/2019 10:06AM said:

I'm just going to schedule it for Tuesday. You've had since yesterday to decide. This isn't a big decision, you either can or can't. I'm not about to lose both spots because you can't let me know if you can take him.

Chalese Anderson on 10/25/2019 10:12AM said:

I'm trying to figure out what I can do with work. Neither of them work because of the location

Adam Solinger on 10/25/2019 10:16AM said:

Tuesday's you don't have him. I was suggesting Thursday's because you are down here anyway to pick up the kids from daycare. You are down this way every other Thursday between 5:30 and 6 anyway if not earlier when you work and put them in daycare. So ultimately you would take him on your days. Nonetheless, I scheduled for Tuesday so we didn't lose both days.

Chalese Anderson on 10/25/2019 4:48PM said:

Can you bring the kids to me after trunk or treat?

Adam Solinger on 10/25/2019 4:50PM said:

So you don't want to go?

Chalese Anderson on 10/25/2019 4:51PM said:

I have to work a little later than expected



Adam Solinger on 8/16/2019 8:28PM said:

FYI, we're really working with Marie and wearing underwear and using the potty. Can you please work with her while you have them for the next couple of days?

8/17/2019

Adam Solinger on 8/17/2019 12:19PM said:

Maq had a lot of fun in soccer yesterday at day care. He really wants to do it every week. Will you pay half the cost as well and make sure that he's at school every Friday so that he can participate? It's \$15 a week.

8/18/2019

Adam Solinger on 8/18/2019 1:38PM said:

I need to know about soccer so I can sign him up tomorrow.

Chalese Anderson on 8/18/2019 1:39PM said:

I'd love to but the kids need to be moved to a more centrally located daycare

Chalese Anderson on 8/18/2019 1:40PM said:

Creative kids has locations all around town

Adam Solinger on 8/18/2019 1:42PM said:

Maq really enjoyed it. Can I at least have your commitment that he will be there every Friday so I'm not wasting money and so he doesn't miss practices and learns dedication?



Chalese Anderson on 8/18/2019 1:42PM said:

Once they are moved then yes

Adam Solinger on 8/18/2019 1:46PM said:

They're not being moved. They were already moved once and they're doing so amazing at this particular day care. But can you please explain to Maq that he won't be able to do soccer because he really wanted to do it.

Chalese Anderson on 8/18/2019 1:46PM said:

Can you please explain to the judge why you are being ridiculous?

Adam Solinger on 8/18/2019 1:49PM said:

It's about what's best for the kids. It has nothing to do with me. It has nothing to do with you. The guiding principle is always what's best for them. Switching them because you decided to move all the way across town is what you want because it suites you, not them. They need stability more than anything right now.

Chalese Anderson on 8/18/2019 1:50PM said:

How is it fair that their daycare is only convenient for you? Why are you not obeying the law specifically concerning that we share legal custody?

Chalese Anderson on 8/18/2019 1:50PM said:

You are the one who moved them!

EXHIBIT 6

EXHIBIT 6

EXHIBIT 6



Adam Solinger on 7/9/2019 8:08PM said:

I literally have the mortgage documents. You didn't put any cash into the closing and we didn't have a joint account at the time. You've never made a mortgage payment. You called twice tonight 4 minutes apart. I called you right back after finishing bath time because I can't answer in the middle of it.

Adam Solinger on 7/9/2019 8:09PM sent:

(See attached on page 294)

Adam Solinger on 7/9/2019 8:09PM said:

Just to confirm, you're feeding them dinner tomorrow so I don't need to feed them before you pick them up at my house at 6.

Chalese Anderson on 7/9/2019 8:09PM said:

We did have a joint account. And I have it all the bank statements

Chalese Anderson on 7/9/2019 8:10PM said:

Me saying I was in a meeting and would call as soon as I'm out. And me trying three times to call

Chalese Anderson on 7/9/2019 8:10PM sent:

(See attached on page 295)

Chalese Anderson on 7/9/2019 8:11PM sent:

(See attached on page 296)

EXHIBIT 7

EXHIBIT 7

EXHIBIT 7



10/28/2019

Chalese Anderson on 10/28/2019 11:26AM said:

What brand was your drone?

Adam Solinger on 10/28/2019 4:34PM said:

Are you seriously asking me that right now? I thought you have it, or is it Lou, or was it Shapiro, oh wait that's right, its the FBI that has it or is it with the the company you paid 5k to? Why don't you ask one of them since they all seem to have it? Or can't you because you sold it. I guess you can look up your old post and see what you listed it as, I'm sure you took a pic before posting it.

Chalese Anderson on 10/28/2019 4:35PM said:

I never sold it. I don't have it. I was asking because I was asked. That's it. Seriously, why are you acting like this? Why do you carry so much hate? Stop it.

Adam Solinger on 10/28/2019 5:14PM said:

Are you serious?!?! You accused me of being a pedophile, and spread that information to your friends and family. Maybe you should stop with the vile and disgusting rumors you are spreading about me.

Chalese Anderson on 10/28/2019 5:16PM said:

Can you please just try to be a decent coparent? All of the other coparents in this situation can all be civil and get along, except for you. If you don't want to tell me the brand then fine, I'll stop trying to track it down. Just because you

EXHIBIT 8

EXHIBIT 8

EXHIBIT 8



The

ABRAMS & MAYO

Law Firm

† 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, October 22, 2019

Jack Fleeman, Esq.
8925 South Pecos Road, Suite 14A
Henderson, Nevada 89074

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

Dear Mr. Fleeman:

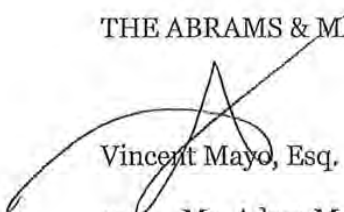
This letter will serve as your reminder that you must disclose your computer expert by 5:00 p.m. on November 1, 2019. As an additional reminder, if you do not disclose an expert by 5:00 p.m. on November 1st, the issues raised regarding the electronics shall be considered moot.

Additionally, no one except Mr. Solinger should retrieve the electronics. As you are likely aware, some electronics were previously released to Attorney Schneider and/or Chalese. Those electronics are now missing. To avoid a repeat of this, Mr. Solinger will retrieve the electronics himself immediately following the deadline.

This correspondence is being written pursuant to EDCR 5.501. Should you have any questions or comments, please do not hesitate to call.

Sincerely,

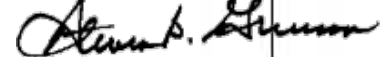
THE ABRAMS & MAYO LAW FIRM


Vincent Mayo, Esq.

cc: Mr. Adam M. Solinger

† Board Certified Family Law Specialist

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



1 **EXMT**

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 **EX PARTE MOTION FOR AN ORDER TO RELEASE**
20 **ELECTRONICS TO ADAM'S AGENT OR, IN THE**
21 **ALTERNATIVE, FOR AN ORDER BARRING THE RELEASE OF**
ELECTRONICS UNTIL FURTHER COURT ORDER

Plaintiff, Adam Michael Solinger, by and through his attorney of record, Vincent Mayo, Esq., of The Abrams & Mayo Law Firm, hereby submits this *Ex Parte Motion for an Order to Release Electronics or, in the Alternative, for an Order Barring the Release of Electronics Until Further Court Order*.

///
///

This Motion is based upon the pleadings and papers on file and the Affidavit of Vincent Mayo, Esq., attached hereto.

DATED: Thursday, November 14, 2019.

Respectfully Submitted,

THE ABRAMS & MAYO LAW FIRM

Vincent Mayo, Esq.
Nevada State Bar Number: 8564
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
Attorney for Plaintiff

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1 **AFFIDAVIT OF VINCENT MAYO, ESQ.**

2 STATE OF NEVADA)
) ss:
3 COUNTY OF CLARK)

4 1. I am an attorney duly licensed to practice law in the State of
5 Nevada. I maintain offices located at THE ABRAMS & MAYO LAW
6 FIRM, 6252 South Rainbow Boulevard, Suite 100, Las Vegas, Nevada
7 89118, and am counsel of record for Plaintiff, Adam Michael Solinger
8 (hereinafter referred to as "Adam"), in the above-entitled action. I have
9 personal knowledge of the facts contained herein and am competent to
10 testify thereto, except for those matters stated upon information and
11 belief, and as to those matters, I believe them to be true.

12 2. During the October 3, 2019 hearing, this Court specifically
13 Ordered that Chalese was to produce an expert report regarding the
14 electronics and Chalese's claim of child pornography on the devices by
15 5:00 p.m. on November 1, 2019 or the issues shall be considered moot.¹

16 3. On October 22, 2019, I sent Attorney Fleeman a letter
17 reminding him of this deadline and letting him know that Adam would
18 be picking up his electronics immediately following the deadline.
19 Attorney Fleeman did not respond to this letter or express any

20
21

¹ October 3, 2019 hearing at timestamp 3:13:15.

1 objections.²

2 4. On November 7, 2019, a representative for Adam went to
3 Expert Data Forensics to pick up the electronics and was informed that
4 Attorney Fleeman needed to approve the release of the electronics.
5 Attorney Fleeman promptly responded stating that he was not the client,
6 Chalese is and then he called Expert Data Forensics to tell them not to
7 release the electronics.

8 5. Being that Mr. Fleeman would not agree to the release of the
9 electronics, my paralegal, Julie Schoen, e-mailed Eliya Azoulay at Expert
10 Data Forensics the following day, on November 8, 2019, requesting that
11 she not release the electronics to Chalese or anyone on her behalf until
12 further Court Order. Ms. Azoulay agreed. Shortly after, Attorney
13 Fleeman e-mailed stating my office had no authority to direct anyone
14 not to release the items as there was no Court Order.³

15 6. Attorney Fleeman's adamant objections to stop Adam from
16 retrieving his property and conducting his own discovery is extremely
17 worrisome. To start with, at least one of Adam's items, an expensive
18 drone, has gone missing since Chalese has hired Expert Data Forensics.
19 Adam does not want any other items to be "lost" while in Chalese's
20 careless custody. More importantly, Chalese made very vile, disgusting

21 ² Please see letter to Attorney Fleeman dated October 22, 2019 attached hereto as Exhibit 1.

³ Please see e-mail exchanges attached hereto as Exhibit 2.

1 allegations against Adam, she then went on to tell multiple people that
2 Adam was a pedophile and had a stash of child pornography, despite
3 stating in her deposition that she is not even sure if any exist. Given the
4 adamant objection to Adam receiving his electronics six days past this
5 Court's deadline, Adam worries Chalese may have tried to plant
6 something on his computer and Expert Data Forensics caught it. This
7 claim is serious and needs to be investigated to find out what exactly
8 happened.

9 7. NRS 48.015 defines relevant evidence as:

10 "Relevant evidence" defined. As used in this chapter,
11 "relevant evidence" means evidence having any tendency to make
12 the existence of any fact that is of consequence to the
determination of the action more or less probable than it would be
without the evidence.

13 NRS 123.225 sets forth that each spouse has a continuing interest in
14 community property. NRS 123.225 states:

15 Interests of each spouse in community property are present,
16 existing and equal interests.

17 1. The respective interests of each spouse in community
18 property during continuance of the marriage relation are present,
existing and equal interests, subject to the provisions of NRS
123.230.

19 2. The provisions of this section apply to all community
property, whether the community property was acquired before,
on or after March 26, 1959.

20 ///

21 ///

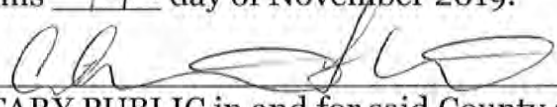
1 Therefore, the information on Adam's electronics is relevant and Adam
2 has the right to review the evidence himself, or through an expert of his
3 choice not only pursuant to our discovery rules but also because the
4 electronics are community property and Chalese has recognized these
5 items as Adam's. Chalese and her counsel are actively attempting to bar
6 Adam from doing so.

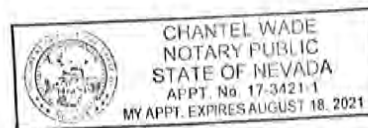
7 8. That based upon the reasons stated above, I respectfully
8 request that this Honorable Court grant the Order for Expert Data
9 Forensics to release all electronics in their possession, as well as a list of
10 all electronics they once had in their possession or, in the alternative,
11 grant the Order directing Expert Data Forensics to withhold all
12 electronics until further Order from this Court.

13 FURTHER, AFFIANT SAYETH NAUGHT.

14
15 
VINCENT MAYO, ESQ.

16 SUBSCRIBED AND SWORN to before
17 me this 14th day of November 2019.

18 
NOTARY PUBLIC in and for said County and State



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 11/14/2019

Signature of Party or Preparer



001045

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1



The

ABRAMS & MAYO

Law Firm

† 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, October 22, 2019

Jack Fleeman, Esq.
8925 South Pecos Road, Suite 14A
Henderson, Nevada 89074

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

Dear Mr. Fleeman:

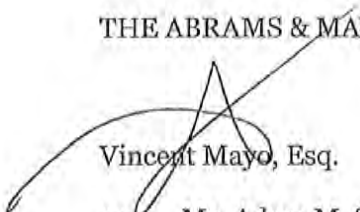
This letter will serve as your reminder that you must disclose your computer expert by 5:00 p.m. on November 1, 2019. As an additional reminder, if you do not disclose an expert by 5:00 p.m. on November 1st, the issues raised regarding the electronics shall be considered moot.

Additionally, no one except Mr. Solinger should retrieve the electronics. As you are likely aware, some electronics were previously released to Attorney Schneider and/or Chalese. Those electronics are now missing. To avoid a repeat of this, Mr. Solinger will retrieve the electronics himself immediately following the deadline.

This correspondence is being written pursuant to EDCR 5.501. 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 M. Solinger

† Board Certified Family Law Specialist

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

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2

Julie Schoen

From: Eliya Azoulay <eliya.azoulay@edfpi.com>
Sent: Sunday, November 10, 2019 9:20 PM
To: Julie Schoen
Cc: 'Jack Fleeman'; Vincent Mayo; Gerry McDermott; Jason Darr; Email; Angela Romero; Alicia Exley; Leon Mare; Dean Schaibley; Email; Bruce Shapiro
Subject: RE: Solinger (ref EDF191157)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ms. Julie Schoen

I was under the impression that this was the agreement between the two parties, since its not, I request that you resend and address your email directive, as well as any future communication regarding this matter, to Mr. Fleeman directly.

Thank you.

Eliya Azoulay-Mare
Director of Operations
Reg#R-071922



**EXPERT DATA
FORENSICS**
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Address: 5071 N. Rainbow Blvd. Suite 180. Las Vegas, NV 89130
ExpertDataForensics.com ~ In business since 2006 ~

Disclaimer: This correspondence and initial phone inquires will not establish Expert Witness Relationship. Relationship is established upon execution of Expert Witness Agreement and acceptance of terms therein. **Notice of Confidentiality:** The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any review, re-transmission, dissemination or other use of, or taking any action in reliance upon, this information by anyone other than the intended recipient is not authorized.

From: Jack Fleeman <Jack@pecoslawgroup.com>
Sent: Sunday, November 10, 2019 12:58 PM
To: Eliya Azoulay <eliya.azoulay@edfpi.com>
Cc: Julie Schoen <JSchoen@theabramslawfirm.com>; Vincent Mayo <vmayo@theabramslawfirm.com>; Gerry McDermott <gerry.mcdermott@edfpi.com>; Jason Darr <jason.darr@edfpi.com>; Email <email@pecoslawgroup.com>; Angela Romero <angela@pecoslawgroup.com>; Alicia Exley <alicia@pecoslawgroup.com>; Leon Mare <leon.mare@edfpi.com>; Dean Schaibley <dean.schaibley@edfpi.com>; Email <email@pecoslawgroup.com>; Bruce Shapiro <Bruce@pecoslawgroup.com>
Subject: Re: Solinger (ref EDF191157)

This is incorrect. Mr. Mayo's office has no authority to direct you or anyone not to release items. There is no order in place allowing him or his office to make such a directive. As such, I would ask that you disregard his directives to you, whether they be to release or withhold items. They have no authority, and should make all requests to us or the court.

Jack W. Fleeman, Esq.

Certified Family Law Specialist

Pecos Law Group
702-388-1851

Sent from my iPhone, please excuse any errors in grammar or spelling.

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On Nov 10, 2019, at 12:22 PM, Eliya Azoulay <eliya.azoulay@edfpi.com> wrote:

Understood.

The items will remain in our custody until we receive a jointly signed Order to release custodianship.

Thank you.

Eliya Azoulay-Mare
Director of Operations
Reg#R-071922

<image002.jpg>

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From: Julie Schoen <JSchoen@theabramslawfirm.com>
Sent: Friday, November 08, 2019 1:58 PM
To: Jack Fleeman <Jack@pecoslawgroup.com>; Eliya Azoulay <eliya.azoulay@edfpi.com>
Cc: Vincent Mayo <vmayo@theabramslawfirm.com>; Gerry McDermott <gerry.mcdermott@edfpi.com>; Jason Darr <jason.darr@edfpi.com>; Email <email@pecoslawgroup.com>; Angela Romero <angela@pecoslawgroup.com>; Alicia Exley <alicia@pecoslawgroup.com>
Subject: RE: SOLinger
Importance: High

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Good afternoon,
This e-mail is being sent at Attorney Mayo's direction. Please do not release any of the electronics to Chalese, or anyone on her behalf until you receive a Stipulation and Order signed by both Attorney's or a Court Order. Thank you.

Sincerely,

Julie Schoen
Certified Paralegal
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702)248-9750
www.TheAbramsLawFirm.com

From: Jack Fleeman <Jack@pecoslawgroup.com>
Sent: Friday, November 8, 2019 12:38 PM
To: Eliya Azoulay <eliya.azoulay@edfpi.com>
Cc: Vincent Mayo <vmayo@theabramslawfirm.com>; Julie Schoen <JSchoen@theabramslawfirm.com>; Gerry McDermott <gerry.mcdermott@edfpi.com>; Jason Darr <jason.darr@edfpi.com>; Email <email@pecoslawgroup.com>; Angela Romero <angela@pecoslawgroup.com>; Alicia Exley <alicia@pecoslawgroup.com>
Subject: Re: SOLinger

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Just for clarification, we are not the client. Chalese is. We do, however, speak on her behalf.

Jack W. Fleeman, Esq.
Certified Family Law Specialist

Pecos Law Group
702-388-1851

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On Nov 8, 2019, at 12:28 PM, Eliya Azoulay <eliya.azoulay@edfpi.com> wrote:

Vincent,

I am waiting on my client; Jack Fleeman Esq. to authorize me (in writing) to do that.

Thank you.

Eliya Azoulay-Mare
Director of Operations

Reg#R-071922

<image002.jpg>

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From: Vincent Mayo <vmayo@theabramslawfirm.com>

Sent: Friday, November 08, 2019 12:23 PM

To: Eliya Azoulay <eliya.azoulay@edfpi.com>
Cc: Julie Schoen <JSchoen@theabramslawfirm.com>
Subject: Solinger
Importance: High

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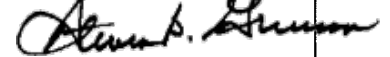
Hello Eliya,

Please release all electronics on the Solinger case in your possession to Jon Matero.
Thank you.

Sincerely,

Vincent Mayo, Esq.
Board Certified Family Law Specialist
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
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1 **MOT**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: Bruce@pecoslawgroup.com

12 *Attorneys for Defendant*

13 **DISTRICT COURT**
14 **CLARK COUNTY, NEVADA**

15 **Adam Michael Solinger,**

16 Plaintiff,

17 vs.

18 **Chalese Marie Solinger,**

19 Defendant.

Case No. **D-19-582245-D**

Dept No. **I**

ORAL ARGUMENT REQUESTED

20 **NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE**
21 **CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR**
22 **RESPONSE WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO**
23 **FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN FOURTEEN (14) DAYS**
24 **OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED RELIEF BEING**
25 **GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING.**

26 **DEFENDANT'S MOTION FOR A CUSTODY EVALUATION, ATTORNEY'S FEES,**
AND RELATED RELIEF

27 **COMES NOW** Defendant **Chalese Marie Solinger** ("Chalese") by and
28 through her attorneys, **Bruce I. Shapiro, Esq.** and **Jack W. Fleeman, Esq.** of
29 PECOS LAW GROUP and moves this Court for the following orders:

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1. Ordering that a custody evaluation be done;
2. Granting Defendant an award of attorney's fees pursuant to *Sargeant v. Sargeant*; and
3. For other and further relief as the Court deems proper.

Defendant's Motion is made and based upon all the papers and pleadings on file herein, the attached Points and Authorities, and any other evidence and argument as may be adduced at the hearing of this matter.

DATED this 15th day of November, 2019.

PECOS LAW GROUP

 #1412

Bruce I. Shapiro, Esq.
Nevada Bar No. 004050
Jack W. Fleeman, Esq.
Nevada Bar No. 010584
PECOS LAW GROUP
8925 South Pecos Road, Suite 14A
Henderson, Nevada 89074
Attorneys for Defendant

1 **INITIAL STATEMENT OF ATTEMPTED RESOLUTION**
2 **PURSUANT TO EDCR 5.501**

3 Pursuant to EDCR 5.501, Defendant's counsel asked Plaintiff about
4 whether a custody evaluation should be performed in this case, and Plaintiff said
5 no. As trial is quickly approaching and Plaintiff's viewpoint on custody has not
6 changed since his deposition, this motion follows.

7 **POINTS AND AUTHORITIES**

8 **I. FACTS**

9 Plaintiff **Adam Michael Solinger** ("Adam") and Defendant **Chalese Marie**
10 **Solinger** ("Chalese") were married on May 12, 2012, in Las Vegas. There are
11 two minor children of the marriage: **Michael Solinger** ("Maq"), born June 16,
12 2015 and **Marie Solinger** ("Marie"), born August 28, 2017.

13 Adam filed his complaint for divorce in January 2019. In his complaint,
14 Adam requested primary physical custody for the sole reason that "upon
15 information and belief Defendant intends to relocate to Pahrump, Nevada." Adam
16 confirmed in his deposition that he set forth no other reason in his complaint as to
17 why he should be awarded primary physical custody. Chalese decided not to move
18 to Pahrump.
19

20 On February 7, 2019, a little over a month after Adam filed his complaint,
21 Chalese filed a motion for exclusive possession, child support, spousal support
22 and fees. It was in Adam's opposition that he, for the first time, listed "concerns"
23
24

1 about Chalese's "fitness" as a parent after discovering she was dating someone
2 new.

3 Notwithstanding Adam's myriad of accusations about drug and alcohol use
4 and the marital home being too messy, the court awarded both parties temporary
5 joint physical custody on March 19, 2019. The court modified this on a temporary
6 basis on June 17, 2019 due to a finding that Chalese did not follow the previous
7 orders regarding her boyfriend watching and driving the children, and gave
8 Chalese visitation on an alternating schedule two days per week "until the Court
9 sees compliance with its orders from Mother" per the court minutes.

11 Adam's true intentions regarding custody, however, were not uncovered
12 until he was deposed. In his deposition, Adam made a number of extremely
13 concerning statements, including:

14 Q: As of right now, what do you think the custody schedule of your
15 children should be?

16 A: I mean, if I'm being frank, I think that it should be supervised
17 visits.

18 Q: Okay. Well, we'll get to that in a minute. What do you think the
19 schedule should be?

20 A: I mean, I think that she should get time to see them so they have a
21 relationship with her. But scheduling-wise I think a few-hour visit or
22 possibly keeping things as is with a chaperone.

23 Q: So you think her visitations need to be supervised?

24 A: Correct.¹

25 ¹ See Excerpts of *Deposition of Adam Solinger* in Defendant's "Exhibit Addendum" as
26 exhibit "A" at page nos. 49-50

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Q: ...For now, I'm just trying to establish what you think the schedules should be. So far I've gathered supervised, a couple hours a day, or a couple hours in duration. How many days a week?

A: Two.

Q: So two hours a day, two days a week, supervised is what you believe her contact should be right now?

A: Right now.²

Q: Would it be fair to say that you think it's in the children's best interest to spend more time with Jessica than with Chalese?

A: Yes.

Q: Do you believe that Chalese loves the children?

A: No.³

Q: So are there any conditions that she could satisfy you, that you would be comfortable her having joint custody?

A: No.

Q: Ever?

A: Not at this time.

Q: When?

A: I mean, I think with several years of psychotherapy, because she's frankly right at the age where I'm concerned about late-onset mental illness and whether this is a manifestation of that, the drugs, or what. But the kids don't really have a good safety mechanism to call me and be safe.

Q: Well, do you believe that she suffers from any mental illness?

A: I believe that – well, I mean, I'm not a psychiatrist. I'm not a psychologist. So I don't know what she suffers from.

² See *Id.* at page nos. 51-50.

³ See *Id.* at page no. 52.

1 Q: Well, why haven't you asked that she be evaluated?

2 A: Number one, I didn't know that that was a possibility, as far as a
3 mental health evaluation. But, number two, because as of right now,
4 even a mental health evaluation would not assuage my concerns.
Time, treatment and therapy is what would make me feel better.

5 Q: So it wouldn't make you feel better if a qualified psychologist
6 tested her, evaluated her, and made recommendations as to what she
needs to do to properly care for the children?

7 A: No, I don't think so.

8 Q: So as you sit here, there's absolutely nothing she can do to satisfy
you that she should have joint custody?

9 A: Correct.⁴

10 Q: If Chalese has a drug and/or alcohol and/or mental health problem,
11 for the sake of your children, why wouldn't you want that to be
12 addressed?

13 A: I tried to address that through my court paperwork.

14 Q: Well, you haven't – I mean, you've addressed –

15 A: I've asked for SCRAM. I've asked for random drug testing. I
believe we asked for the drug patch. And that was denied. She's
subject to random testing at my expense once a month.

16 Q: But nothing regarding treatment?

17 A: In my experience with criminal defense, people who want
18 treatment get treatment. Those who just want to hide their addiction
and to – if you suggest treatment to somebody who has a problem but
19 doesn't want to fix it, they're just going to get better at hiding it.

20 Q: Well, do you think that she can afford treatment?

21 A: I don't know what her financial situation is.

22 Q: Would you be willing to pay for treatment?

23 A: No.

24 Q: You wouldn't be willing to pay for a child custody evaluation?

25 ⁴ See *Id.* at page nos. 74-75.

1 A: I don't think one's necessary.⁵

2 Further, an examination of the communications between the parties shows
3 game-playing by Adam using the children to put Chalese down, try to provoke her
4 to anger, and exhibiting general condescension as to Chalese's parenting (which,
5 for the record, Chalese did largely on her own before the parties separated and to
6 which Adam never expressed objection before).
7

8 For example, on August 5, 2019, Adam messaged Chalese to tell her Maq
9 was home sick from daycare and that he would be staying home with Jessica,
10 never even offering for Chalese to take care of him.⁶ The following day, Adam
11 told Chalese she would have to call Jessica's phone for her phone call with the
12 children because he had to leave the house at 7:26 p.m.⁷
13

14 Adam not being home late into the evening and leaving the children with
15 Jessica is a recurring pattern here. According to the parties' messages, Adam was
16 not home after 7:00 p.m. on September 26, 2019,⁸ October 10, 2019,⁹ October 24,
17 2019,¹⁰ and November 7, 2019.¹¹
18

19 ⁵ *Id.* at page nos. 77-78.

20 ⁶ *See* messages between the parties in DEA at exhibit "B" at bates stamp no. ("BS") 001040.

21 ⁷ *See Id.* at 001044.

22 ⁸ *See Id.* at 001649.

23 ⁹ *See Id.* at 001663.

24 ¹⁰ *See Id.* at 001673.

1 Prior to October 10, 2019, Adam took vacation time with the children while
2 Chalese's mother was in town, but did not take the children out of town. Chalese
3 asked if she could have the children for an hour or two to see their grandmother
4 before she returned to Florida, and Adam told her no.¹² On October 10, 2019 – the
5 day Chalese wanted the children for an hour or two – Adam told her he was not
6 home. Adam therefore refused to allow Chalese's mother to see the children that
7 day, even though he was not even home.

8
9 Adam has also created a double standard regarding daycare. On August 22,
10 2019, Adam told Chalese:

11 We need to make sure the kids are in school everyday. Especially
12 Maq because they teach things everyday as part of pre-k and then they
13 test them to make sure they're ready for kindergarten at the end of the
year. We don't want him to fall behind.¹³

14 Despite Adam chastising Chalese for not bringing the children to daycare
15 every day, Adam repeatedly does not take them to daycare or picks them up early
16 from daycare. On September 4, 2019, he took the children out of daycare early to
17 take them to the dentist, then did not return them, telling Chalese:

18 If I'm able to be off early and pick them up and hang out with them before you are
19 there and it's a reasonable amount of time I get to hang out with them, I will
20

21
22 ¹¹ See *Id.* at 001781.

23 ¹² See *Id.* at 001662.

24 ¹³ See *Id.* at 001068.

1 always pick them up. I'm not keeping them in daycare just because you don't
2 want to pick them up from their home.¹⁴

3 On September 5, 2019, when Chalese wants to keep the kids home to visit
4 with a friend, Adam reiterates that Maq needs to be in school because "he's in pre-
5 k and when he misses a day he falls behind. It set a bad example that he can miss
6 school whenever."¹⁵

7
8 When Chalese asks if she can pick up the children from daycare early on
9 her custodial days, Adam has taken to telling her no because he is picking them up
10 early. This occurred on September 26, 2019¹⁶ and October 30, 2019.¹⁷ Adam also
11 took the children out of daycare early on October 16, 2019.¹⁸

12 Adam frequently resorts to long lectures to Chalese about her parenting and
13 chastising her about things that have already been discussed *ad nauseum*. For
14 example, after getting the children back from Chalese, Adam accused her of not
15 bathing the children all weekends, of having dirty hands, of not brushing their
16 teeth, and of refusing to practice speech therapy with Maq, none of which were
17 true. He was also angry after Maq called Jessica "grandma" and, of course,
18

19
20 ¹⁴ See *Id.* at 001099. Note that Adam characterizes his and Jessica's house as "their home"
not "my home."

21 ¹⁵ See *Id.* at 001103.

22 ¹⁶ See *Id.* at 001649.

23 ¹⁷ See *Id.* at 001688.

24 ¹⁸ See *Id.* at 001665-001666.

1 blamed Chalese for it.¹⁹ Chalese told him she was taking care of the children's
2 hygiene and that they had been calling people "grandma" and "grandpa" to be
3 funny, and that their hands were dirty because they were playing outside before
4 Adam picked them up. Adam then claimed Maq (who is four years old) told
5 Adam, unprovoked, that he did not take a bath or brush his teeth and that he saw
6 Chalese with a "special drink," then tells her that Maq's hair is not cut correctly.
7

8 Chalese clarified her "special drink" was an energy drink and asks him to
9 stop involving Maq in his accusations. In response, Adam stated, "Everything you
10 say is a lie, why would I ask you anything. You lie to the court, you lie to me, you
11 lie to the kids, you can't help yourself."²⁰

12 The following day, Adam then sent Chalese a long message after she
13 defended herself against his accusation that she was not adequately practicing with
14 Maq for his speech therapy (which Chalese handled solely prior to the separation).
15 In it, he accuses Chalese of calling "our son a liar" and of neglecting the children's
16 hygiene, and also brings up Chalese "accusing me of being a pedophile and telling
17 your friends and family that I am."²¹
18

19 In contrast, Chalese has been making a substantial effort on her part to
20 incorporate what she learned from her parenting class and try to lessen the conflict
21 with Adam. For example, for Halloween, even though it was Chalese's time with

22 ¹⁹ See *Id.* at 001682.

23 ²⁰ See *Id.* at 001683-001684.

24 ²¹ See *Id.* at 001687-001688.

1 the children, Adam asked if he and Jessica could take the children trick or treating
2 at the daycare, and telling her, “I just don’t want to get their hopes up and then let
3 them down.” Chalese agreed to sacrifice some of her time with the children to
4 Adam, initially stating she would bring Josh and his children as well.²²

5 A little later, Chalese changed her mind about wanting to attend the trick or
6 treating event with Adam and Jessica, explaining that she was not comfortable
7 with it and “[t]hings are still too fresh.”²³ Instead of understanding that his wife
8 may not want to attend an event with him and his new girlfriend (who Maq now
9 calls “mom”), Adam berated Chalese, telling her, “You realize I already told the
10 kids you were going to be there with the kids and Josh.”²⁴ Chalese told him she
11 was letting him have extra time with the children and did not want to argue, but
12 Adam continued, stating, “I already told the kids you were be there they were
13 excited ... I’m obviously not going to disappoint the kids and say we aren’t going
14 now, you already let them down tonight by changing your mind, they don’t need
15 two parents disappointing them.”²⁵

16 Adam frequently denies Chalese phone contact with the children, and they
17 are usually, conveniently, either eating or bathing or already asleep by the time
18 Chalese calls at 7:00 p.m. When Chalese had custody of the children, however,
19
20

21 ²² See *Id.* at 001673-001674.

22 ²³ See *Id.* at 001675-001676.

23 ²⁴ See *Id.* at 001676.

24 ²⁵ See *Id.* at 001677.

1 and Marie was going to bed early, she messaged Adam and offered to let him talk
2 to her early.²⁶

3 Adam is so angry at Chalese, he does not want the children to have a
4 relationship with her, and his constant beratement and harassment is in no way
5 beneficial to the children. The court's *temporary* award of primary custody to
6 Adam appears to have gone to his head, and he believes Chalese should receive
7 four hours per week, supervised, with the children for which she provided primary
8 care without objection from Adam for years before this litigation.
9

10 Further, it is highly doubtful that four-year-old Maq is telling Adam all the
11 things Adam claims he tells him without some sort of prompting, and Chalese is
12 now concerned Adam is either lying about what Maq is telling him just to upset
13 Chalese, or that Adam is interrogating the children every time they return to him
14 from Chalese's home. This behavior, along with Adam continuing to have Chalese
15 followed by a private investigator and putting a GPS tracker on her vehicle, is
16 only exacerbating the conflict between the parties. It is clear that a custody
17 evaluation is needed.
18

19 **II. LEGAL ARGUMENT**

20 **A. THE COURT SHOULD ORDER A CUSTODY EVALUATION.**

21 EDCR 5.305(b) states:

22 When it appears that an expert medical, psychiatric, or psychological
23 evaluation is necessary for any party or minor child, the parties shall

24 ²⁶ See *Id.* at 001681.

1 attempt to agree to retention of one expert. Upon request of either
2 party, or on its own initiative, the court may appoint a neutral expert if
3 the parties cannot agree on one expert and make provisions for
payment of that expert.

4 A professional is needed to assess any risk that either parent presents to the
5 children because Adam in particular seems more focused on spite than the best
6 interests of the children. Adam has presented no evidence that should prevent
7 Chalese from having joint physical custody of the children, and the input of a
8 professional will provide significant assistance to the court in this matter. Adam's
9 income is approximately seven times that of Chalese's, and the court should order
10 that he pay for the custody evaluation.
11

12 **B. DEFENDANT SHOULD BE AWARDED ATTORNEY'S FEES.**

13 With the monthly contributions from his father, Adam earns nearly ten
14 times as much as Chalese, and his father has been solely funding his portion of
15 this litigation, providing Adam with over \$50,000.00 for attorney's fees. Chalese
16 does not have the luxury of a well-paying job or wealthy parents. She has been
17 forced to borrow money from her mother for fees, but her mother cannot afford to
18 continue lending money.
19

20 Further, not only is Adam the financially advantaged spouse with the added
21 advantage of having a father who is willing to pay the entirety of his fees, but
22 Adam has the added benefit of being an attorney, putting Chalese at further
23 disadvantage. Additionally, since Adam last opposed Chalese's request to
24

1 continue trial, stating he was ready for trial, Adam has been piling on more
2 witnesses, documents, and subpoenas. Without significant fees, Chalese will be
3 unable to meet Adam on equal footing.

4
5 Based on the facts above, Adam does not respect Chalese's rights as a
6 parent and has implied he wishes to replace her with his girlfriend as the
7 children's mother. A custody evaluation is needed, and Adam is the only party
8 here with funds to pay. Further, Chalese needs significant *Sargeant* fees from
9 Adam in order to remain on equal footing with him through trial.

10
11 A financially disadvantaged party "must be afforded her day in court
12 without destroying her financial position" and should not be forced to "liquidate
13 her savings and jeopardize the child's and her future subsistence still without
14 gaining parity with her husband." *Sargeant v. Sargeant*, 88 Nev. 223, 227, 495
15 P.2d 618, 621 (1972).

16
17 Awards of attorney's fees are within the sound discretion of the district
18 court. *Fletcher v. Fletcher*, 89 Nev. 540, 516 P.2d 103 (1973); *Levy v. Levy*, 96
19 Nev. 902, 620 P.2d 860 (1980); *Hybarger v. Hybarger*, 103 Nev. 255, 737 P.2d
20 889 (1987). When considering whether to award attorney's fees, the Court must
21 evaluate the legal basis for such fees and also the factors outlined in *Brunzell v.*
22 *Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969), which are
23 as follows:

1 (1) The qualities of the advocate: his ability, his training, education,
2 experience, professional standing and skill; (2) the character of the
3 work to be done: its difficulty, its intricacy, its importance, time and
4 skill required, the responsibility imposed and the prominence and
5 character of the parties where they affect the importance of the
6 litigation; (3) the work actually performed by the lawyer: the skill,
7 time and attention given to the work; (4) the result: whether the
8 attorney was successful and what benefits were derived.

9 Each factor should be given consideration, and no one element should be
10 given undue weight or predominate. *Miller v. Wilfong*, 121 Nev. 619, 119 P.3d
11 727 (2005). The Court should also consider any disparity in income between the
12 parties when awarding fees. *Id.* at 623, 730 (citing *Wright v. Osburn*, 114 Nev.
13 1367, 970 P.2d 1071 (1998)).

14 With respect to the *Brunzell* factors, Counsel in this case are well-qualified
15 and members in good standing of the State Bar. Mr. Shapiro has been practicing
16 law for more than 28 years, primarily in the field of family law since 1990. Mr.
17 Fleeman has been practicing family law for approximately 10 years and is a
18 certified family law specialist. This motion is critical to the resolution of the issues
19 raised in this matter. Further, a good deal of time and skill that is particular to
20 family law cases has been required to ensure the fact present a comprehensive
21 picture of the outstanding issues. The undersigned counsel, in working on this
22 case, diligently checked facts and reviewed the law. Counsel has, through
23 application of law to facts, striven to present a concise and logical picture of
24 where these parties are and what we believe is the appropriate conclusion for the

1 court to reach. A sample of the effort expended, in the form of the client's
2 monthly statements, redacted as to confidential information, will be supplied to
3 the court upon request.

4
5 **III. CONCLUSION**

6 WHEREFORE, based on the foregoing, Chalese respectfully requests that this
7 Court enter orders granting her the following relief:

- 8 1. Ordering that a custody evaluation be done;
9 2. Granting Defendant an award of attorney's fees pursuant to *Sargeant*
10 *v. Sargeant*; and
11 3. For other and further relief as the Court deems proper.

12 DATED this 15th day of November, 2019.

13
14 PECOS LAW GROUP

15  ss 14192

16 **Bruce I. Shapiro, Esq.**

17 Nevada Bar No. 004050

18 **Jack W. Fleeman, Esq.**

19 Nevada Bar No. 010584

20 PECOS LAW GROUP

21 8925 South Pecos Road, Suite 14A

22 Henderson, Nevada 89074

23 *Attorneys for Defendant*

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DECLARATION OF CHALESE SOLINGER

I, **Chalese Solinger**, am the Defendant in the above entitled action. I make this declaration under penalty of perjury in support of the foregoing motion.

I have read the motion and hereby certify that the facts set forth therein are true of my own personal 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 those facts into this Declaration as though fully set forth herein.

I Declare under penalty of perjury that the foregoing is true and correct.

DATED this _____ day of November, 2019.




CHALESE SOLINGER

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I hereby certify that the foregoing
3 "DEFENDANT'S MOTION FOR A CUSTODY EVALUATION,
4 ATTORNEY'S FEES, AND RELATED RELIEF" in the above-captioned case
5 was served this date by e-service, pursuant to Rule 9 of N.E.F.C.R., E.D.C.R.
6 7.26(a)(4), and E.J.D.C. AO 9-12 and AO 14-2, to the following email(s), which
7 is/are the email(s) registered with the electronic filing system:
8

9
10 Vincent Mayo VMGroup@TheAbramsLawFirm.com
11 admin email email@pecoslawgroup.com
12 Jack Fleeman jack@pecoslawgroup.com
13 Amy Robinson amy@pecoslawgroup.com
14 Bruce Shapiro bruce@pecoslawgroup.com
15 Alicia Exley alicia@pecoslawgroup.com
16 Angela Romero angela@pecoslawgroup.com
17

18 DATED this 15th day of November, 2019.

19
20 
21 Angela Romero,
22 An Employee of PECOS LAW GROUP
23
24

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Adam M. Solinger,
Plaintiff/Petitioner

Chalese M. 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.
- ☒ **\$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.

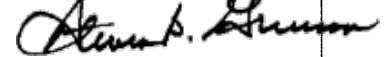
The total filing fee for the motion/opposition I am filing with this form is:

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

Party filing Motion/Opposition: Defendant Date 11/15/19

Signature of Party or Preparer

[Signature]



1 **EXHS**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

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11 Email: Bruce@pecoslawgroup.com

12 *Attorneys for Defendant*

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

16 **Adam Michael Solinger,**

17 Plaintiff,

18 vs.

19 **Chalese Marie Solinger,**

20 Defendant.

Case No. **D-19-582245-D**

Dept No. **I**

21 **EXHIBITS TO**
22 **DEFENDANT'S MOTION FOR A CUSTODY EVALUATION, ATTORNEY'S FEES,**
23 **AND RELATED RELIEF**

24 EXHIBIT A:	Excerpts of <i>Deposition of Adam Solingers</i>	Page nos. 1, 49- 52, 74-75, 77-78
25 ...		
26 ...		
27 ...		
28 ...		

1	EXHIBIT B:	AppClose messages between parties	Bates stamp nos.
2			001040, 001044,
3			001068, 001099,
4			001103, 001649,
5			001662, 001663,
6			001665-001666,
7			001673-001677,
8			001681-001684,
9			001687-001688,
10			001781

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DATED this 15th day of November, 2019.

PECOS LAW GROUP

 11-14-19

Bruce I. Shapiro, Esq.

Nevada Bar No. 004050

Jack W. Fleeman, Esq.

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW GROUP, and that on this 15th day of November, 2019, I served a copy of **EXHIBITS TO DEFENDANT'S MOTION FOR A CUSTODY EVALUATION, ATTORNEY'S FEES, AND RELATED RELIEF** as follows:

☐ By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; and/or

☒ Pursuant to NEFCR 9, by mandatory electronic service through the Eighth Judicial District Court's electronic filing system; and/or

☐ Pursuant to EDCR 7.26, to be sent via facsimile; and/or

☐ To be hand-delivered to the attorneys listed below at the address and/or facsimile number indicated below:

Vincent Mayo	VMGroup@TheAbramsLawFirm.com
admin email	email@pecoslawgroup.com
Jack Fleeman	jack@pecoslawgroup.com
Amy Robinson	amy@pecoslawgroup.com
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Alicia Exley	alicia@pecoslawgroup.com
Angela Romero	Angela@pecoslawgroup.com



ANGELA ROMERO
An employee of PECOS LAW GROUP

EXHIBIT “A”

Jennifer Poynter-Willis

From: Beth Rosenblum <beth@mushlaw.net>
Sent: Friday, September 27, 2019 10:15 AM
To: RLM Admin; Jennifer Poynter-Willis
Cc: Amalia Sciscento; Adam Britt
Subject: Re: Gumina
Attachments: Proposed Decree .pdf

Hello Jennifer,

I'm forwarding to you a proposed decree of divorce. Please review with your client and advise if we can have our client come sign, then we'll forward the original to you for filing.—B

--

Beth I. Rosenblum, Esq.
Mushkin & Rosenblum, Chartered
1291 Galleria Drive, Suite 230
Henderson, NV 89014
Telephone: (702) 474-2400
Fax: (702) 474-4176

PRIVILEGE AND CONFIDENTIALITY NOTICE

The information in this electronic mail is intended for the named recipients only. It may contain privileged and confidential matter. If you have received this electronic mail in error, please notify the sender immediately by replying to this electronic e-mail or by contacting the sender at (702) 474-2400. Please do not disclose the contents to anyone and please delete this e-mail message and any attachments from your workstation or network mail system. Thank you.

1 to the separation in November, you never took either
2 child to the doctor by yourself?

3 A. Correct. I mean, there's a division of work
4 in any kind of relationship; right?

5 Q. Do the children have a dentist?

6 A. Yes, they do.

7 Q. Who is that?

8 A. Dr. Hoban at Summerlin Valley Pediatrics --
9 Pediatric Dentistry.

10 Q. Did you ever take the children to the
11 dentist before November 2018?

12 A. I attended some of their appointments
13 similarly, but there was never a time I recall that I
14 took them independently.

15 Q. So would it be fair to say that prior to
16 November of 2018, doctors' appointments and dentist
17 appointments and things of that nature were Chalese's
18 responsibility?

19 A. Yes, in the division of the relationship.

20 Q. As of right now, what do you think the
21 custody schedule of your children should be?

22 A. I mean, if I'm being frank, I think that it
23 should be supervised visits.

24 Q. Okay. Well, we'll get to that in a minute.
25 What do you think the schedule should be?

1 A. I mean, I think that she should get time to
2 see them so they have a relationship with her. But
3 scheduling-wise I think a few-hour visit or possibly
4 keeping things as is with a chaperone.

5 Q. So you think her visitations need to be
6 supervised?

7 A. Correct.

8 Q. And they should be a couple hours in
9 duration?

10 A. It's just about the safety of them. I got
11 my son back not yesterday but the time before that,
12 and he came home talking about how when he's a
13 grown-up, he's going to drink lots and lots of beers
14 because that's what grown-ups do. And when asked
15 which grown-ups do that, he said Chalese and Josh, or
16 "Mommy and Josh."

17 Q. Well, we'll get to the reasons in a minute.
18 For now, I'm just trying to establish what you think
19 the schedules should be. So far I've gathered
20 supervised, a couple hours a day, or a couple hours
21 in duration. How many days a week?

22 A. Two.

23 Q. So two hours a day, two days a week,
24 supervised is what you believe her contact should be
25 right now?

1 A. Right now.

2 Q. And why do you think that's in the
3 children's best interest?

4 A. Because there are things done that are
5 actively against their interest that are permanently
6 damaging at this point, and I can't fix that. And so
7 I have to do what I can do to keep them safe, which
8 is limit the time frame that bad things can happen to
9 them.

10 Q. Well, would you agree that under normal
11 circumstances, it's better for the children to be
12 cared for by a parent rather than a non-parent?

13 A. No, not necessarily.

14 Q. Well, if you had the children under your
15 proposed schedule, what would your plan be for the
16 children when you're working?

17 A. They're in day care currently full-time.
18 Technically, my son is in prekindergarten right now.

19 Q. Well, what time does day care start?

20 A. The day care opens at 6:30. I try to have
21 them there no earlier than 8:30 or 9:00 most days, if
22 I can help it. And then I also try to pick them up
23 as early as I can.

24 Q. Which is generally what time?

25 A. Anywhere between 3:30 and 5:00.

1 Q. Would it be fair to say that most of the
2 time it's closer to 5:00?

3 A. No.

4 Q. Does Jessica ever drop them off or pick them
5 up?

6 A. Yes, frequently.

7 Q. Why?

8 A. Well, today I had to leave early, and she
9 didn't have to go into work till later. So I could
10 have taken the kids at 6:30 this morning and dropped
11 them off, or I could have let them have a relaxed
12 morning with her, a good breakfast instead of
13 something microwaved on a plate at the day care,
14 relax, and not rush, rush, rush. Yeah, they could be
15 at day care, or they could be at home.

16 Q. Would it be fair to say that you think it's
17 in the children's best interest to spend more time
18 with Jessica than with Chalese?

19 A. Yes.

20 Q. Do you believe that Chalese loves the
21 children?

22 A. No.

23 Q. Why don't you believe that?

24 A. Because there's been things that she's done
25 during the course of this litigation that have

1 what would your concern be?

2 A. It's still physically impossible. She just
3 tried to game her most recent drug test by, at a
4 minimum, getting a urine detoxer.

5 Q. So are there any conditions that she could
6 satisfy you, that you would be comfortable her having
7 joint custody?

8 A. No.

9 Q. Ever?

10 A. Not at this time.

11 Q. When?

12 A. I mean, I think with several years of
13 psychotherapy, because she's frankly right at the age
14 where I'm concerned about late-onset mental illness
15 and whether this is a manifestation of that, the
16 drugs, or what. But the kids don't really have a
17 good safety mechanism to call me and be safe.

18 Q. Well, do you believe that she suffers from
19 any mental illness?

20 A. I believe that -- well, I mean, I'm not a
21 psychiatrist. I'm not a psychologist. So I don't
22 know what she suffers from.

23 Q. Well, why haven't you asked that she be
24 evaluated?

25 A. Number one, I didn't know that that was a

1 possibility, as far as a mental health evaluation.
2 But, number two, because as of right now, even a
3 mental health evaluation would not assuage my
4 concerns. Time, treatment and therapy is what would
5 make me feel better.

6 Q. So it wouldn't make you feel better if a
7 qualified psychologist tested her, evaluated her, and
8 made recommendations as to what she needs to do to
9 properly care for the children?

10 A. No, I don't think so.

11 Q. So as you sit here, there's absolutely
12 nothing she can do to satisfy you that she should
13 have joint custody?

14 A. Correct.

15 Q. And as you sit here, you don't see any point
16 in having her evaluated or having a child custody
17 evaluation performed?

18 A. No.

19 Q. Did she use marijuana before the two of you
20 separated in November of 2018?

21 A. The only time I'm aware of was when it was
22 legalized, July 1st of 2017.

23 Q. When she used it with you?

24 A. Yes.

25 Q. How many occasions did she use it with you?

1 children. And I took a video of it while I grabbed
2 the antibiotic and left.

3 Q. Have you ever suggested to Chalese that she
4 should seek treatment for alcohol or drugs?

5 A. No.

6 Q. Have you ever suggested to Chalese that she
7 should have a mental health evaluation?

8 A. I think in response to her accusing me of
9 having cartoon child porn, I said she was crazy one
10 time. But I've never directly suggested that she
11 have a mental health evaluation because it was my
12 understanding that she was under the care of, at that
13 time, about three different mental health
14 professionals.

15 Q. If Chalese has a drug and/or alcohol and/or
16 mental health problem, for the sake of your children,
17 why wouldn't you want that to be addressed?

18 A. I tried to address that through my court
19 paperwork.

20 Q. Well, you haven't -- I mean, you've
21 addressed --

22 A. I've asked for SCRAM. I've asked for random
23 testing. I believe we asked for the drug patch. And
24 that was denied. She's subject to random testing at
25 my expense once a month.

1 Q. But nothing regarding treatment?

2 A. In my experience with criminal defense,
3 people who want treatment get treatment. Those who
4 just want to hide their addiction and to -- if you
5 suggest treatment to somebody who has a problem but
6 doesn't want to fix it, they're just going to get
7 better at hiding it.

8 Q. Well, do you think that she can afford
9 treatment?

10 A. I don't know what her financial situation
11 is.

12 Q. Would you be willing to pay for treatment?

13 A. No.

14 Q. You wouldn't be willing to pay for a child
15 custody evaluation?

16 A. I don't think one's necessary.

17 Q. Is that a no?

18 A. Uh-huh. No.

19 Q. Would you be willing to pay for an
20 independent medical examination?

21 A. What would be the purpose of the independent
22 medical examination?

23 Q. To determine whether she has a mental health
24 issue.

25 A. No.

EXHIBIT “B”



Adam Solinger on 8/5/2019 8:49AM said:

It's doing better.

Adam Solinger on 8/5/2019 12:11PM said:

Maq is home sick from day care today with a 100.5 fever.

Chalese Anderson on 8/5/2019 12:32PM said:

Who's with him?

Adam Solinger on 8/5/2019 1:08PM said:

Jessica is with him until I finish my office work for the day.

Chalese Anderson on 8/5/2019 1:09PM said:

Ok. Tell her thank you for me

Chalese Anderson on 8/5/2019 4:16PM said:

I got a call from the title company, they are sending the \$500 they held into your attorneys account. Can we please just split it all 50/50? Including custody? I don't understand why we are fighting over OUR kids. We're both good parents, much better apart, we don't need all of this bull shit. Let's just both be reasonable and try to save and salvage what we still can

Chalese Anderson on 8/5/2019 7:00PM said:

I'll call in 5-10



Chalese Anderson on 8/6/2019 7:17PM said:

He is growing. There are a million reasons why he could be exhausted. Stop placing the blame on me for something your brain can't comprehend

Chalese Anderson on 8/6/2019 7:20PM said:

Just admit it. All you want is to make me out to be the bad parent and only care about what you want and your needs. Get over it. Stop being so petty and pathetic. Grow up and do what's best for your children, for once. You were never there before, admit it. You didn't care. You still don't care. All you care about is hurting me and having money in your pockets and having control over me. It's time for all of your nonsense to stop.

Adam Solinger on 8/6/2019 7:21PM said:

I get 2 kids back from you. Both are not okay. One has severe diaper rash and the other is exhausted to the point he almost sleeps an entire day. What I comprehend is that they are not in a stable environment while they are with you. FaceTime even shows it. Maq was literally sad every time I talked to him. Marie was kicking at the phone. Why do they act this way while they are with you? Why can't you see they are severely stressed. I'm just pointing it out as a concern. Im not going to go back and forth.

Adam Solinger on 8/6/2019 7:26PM said:

I have to leave the house. You can call Jessica's phone for FaceTime.



Chalese Anderson on 8/22/2019 6:26AM said:

Well the second he got in the truck he was telling me about his mommy and daddy buying him toys and how he likes calling her that. Please sit him down and talk to him and explain to him.

Adam Solinger on 8/22/2019 6:32AM said:

This is the first I'm hear of it. I'll see how this week goes and talk to him.

Chalese Anderson on 8/22/2019 6:38AM said:

This isn't the first time. I am telling you that you need to have a talk with him

Adam Solinger on 8/22/2019 5:33PM said:

How is marie doing with using the potty? How are Maq's injection sites?

Adam Solinger on 8/22/2019 7:17PM said:

Will the kids be in day care tomorrow for pick up? Also, we need to make sure the kids are in school everyday. Especially Maq because they teach things everyday as part of pre-k and then they test them to make sure they're ready for kindergarten at the end of the year. We don't want him to fall behind.

Chalese Anderson on 8/22/2019 7:34PM said:

01F
44D



Chalese Anderson on 9/4/2019 1:54PM said:

I unfortunately cannot. I have appointments scheduled today and I can only go to one location I can go to which closes at 6pm. I can do it first thing in the morning, however.

Adam Solinger on 9/4/2019 2:05PM said:

I will remind you you have 4 hours to take the test. Tomorrow morning is not 4 hours. I sent the message at 12:06 and you saw it at 12:14. You have until 4:14.

Chalese Anderson on 9/4/2019 2:10PM said:

Can you please be mindful of my job? I can't just leave

Chalese Anderson on 9/4/2019 4:03PM said:

Please leave the kids at school for me to pick up

Adam Solinger on 9/4/2019 4:21PM said:

They had the dentist today. I'm not taking them back to school

Adam Solinger on 9/4/2019 4:27PM said:

Also, for future reference. If I'm able to be off early and pick them up and hang out with them before you are there and it's a reasonable amount of time I get to hang out with them, I will always pick them up. I'm Not keeping them in daycare just because you don't want to pick them up from their home. Did you go to the location by the court? I need to pay for the test.



Adam Solinger on 9/5/2019 7:13PM said:

I already viewed our cameras with sound but thank you for the suggestion.

Adam Solinger on 9/5/2019 7:21PM said:

If you don't want the kids tonight, I'm more than happy to have them. Please remember that I have right of first refusal.

Chalese Anderson on 9/5/2019 7:21PM said:

Tasha has been out of town and would like to spend time with them. I always want them

Adam Solinger on 9/5/2019 7:22PM said:

Not to mention, he's in pre-k and when he misses a day he falls behind. It sets a bad example that he can miss school whenever.

Chalese Anderson on 9/5/2019 7:23PM said:

Haha 🙄 thanks for your thoughts

Adam Solinger on 9/5/2019 7:23PM said:

Always a pleasure coparenting with you.

Adam Solinger on 9/5/2019 7:24PM said:

So where am I picking up the kids tomorrow?

Chalese Anderson on 9/5/2019 7:42PM said:

You can pick them up from the park by her house at 6pm



9/25/2019

Adam Solinger on 9/25/2019 6:05PM said:

Maq is going out for a special event tonight and won't be here at 7. Would you like to FaceTime now?

Chalese Anderson on 9/25/2019 6:06PM said:

I will be home in 10 mins. Is that too late?

Chalese Anderson on 9/25/2019 6:21PM said:

GPS says 8 mins then I'll call

9/26/2019

Adam Solinger on 9/26/2019 7:07PM said:

I'm not home you will need to call Jessica to talk to the kids.

Chalese Anderson on 9/26/2019 7:53PM said:

Can I please pick the kids up before 6 tomorrow?

Adam Solinger on 9/26/2019 8:13PM said:

No, I'm working a partial day and picking them up early.

Chalese Anderson on 9/26/2019 8:16PM said:

Can I grab them earlier than 6 from you?

Adam Solinger on 9/26/2019 8:41PM said:

That won't work.



Chalese Anderson on 10/8/2019 12:41PM said:

If her and Arielle are here at the same time then she shares a room. They each have their own bed. Marie always goes down first and doesn't often wake during the night. She still stirs a bit, though.

Chalese Anderson on 10/8/2019 5:12PM said:

Do you mind if the kids go to dinner with us while my mom is in town? I'll bring them back after we are done. Either tomorrow night, Thursday night, or Friday night?

Adam Solinger on 10/8/2019 6:34PM said:

No, we already have plans and that's why we took the vacation time.

Chalese Anderson on 10/8/2019 6:35PM said:

You already said you were staying in town. I'm only asking for an hour or two so they can see my mom before she goes back to Florida with my grandma

10/9/2019

Adam Solinger on 10/9/2019 5:25PM said:

How long is your mom in town till?

Chalese Anderson on 10/9/2019 5:26PM said:

She leaves Saturday




Adam Solinger on 10/9/2019 5:37PM said:

Ok. I took Marie to the doctor today because she had a slight cough and runny nose. The doctor thought he heard a slight, innocent heart murmur. He said nothing to be concerned about but said to still get it checked out, so he referred us to a cardiologist. I'll let you know when it's scheduled.

Chalese Anderson on 10/9/2019 5:38PM said:

She's had that since she was born

Adam Solinger on 10/9/2019 5:38PM sent:

📎 (See attached  on page 328)

10/10/2019

Chalese Anderson on 10/10/2019 5:23PM said:

Can I call the kids soon so my mom can see them

Adam Solinger on 10/10/2019 7:19PM said:

I'm not home. You can call Jessica to talk to the kids.

Chalese Anderson on 10/10/2019 7:22PM said:

So you couldn't let the kids see my mom for 1 hour for dinner but you can leave them with your gf?

Adam Solinger on 10/10/2019 8:39PM said:

I don't understand the faux outrage. Your mom has never once asked to FaceTime with the kids. She wasn't even on the phone call. I don't appreciate you jumping to



Adam Solinger on 10/14/2019 8:04PM said:

We tried to give her the phone. She screamed and said no.
We tried again. She screamed again while throwing the
phone at Maq.

Chalese Anderson on 10/14/2019 8:07PM said:

You haven't let me talk to her the past couple nights

Adam Solinger on 10/14/2019 8:11PM said:

Last night she went to bed early because she was worn out
from the day. It has nothing to do with me not letting you.
Tonight we tried to and she refused, it has nothing to do
with me not letting you. What would you like me to do?
Restrain her and put the phone in front of her face? How do
you propose I have her talk to you when she screams and
throws the phone? I'm open to options but I can't let her
throw and possibly break an expensive phone and hurt Maq
in the meantime.

10/16/2019

Chalese Anderson on 10/16/2019 12:57PM said:

Please leave them at daycare for me to pick up today

Adam Solinger on 10/16/2019 1:42PM said:

They will not be in day care for pick up. Maq has speech
therapy with his new speech therapist at 5. They just
confirmed the appointment late yesterday. I told the kids we
would pick them up after nap so that I could practice his
word worksheets from Margo with him since you don't want



to work on the words prescribed to him by the speech therapist and instead want to work on whatever words you think are appropriate. This way I can ensure he only ever misses 1 day of practice. I'm always going to pick the kids up to spend time with them if I'm able to rather than leaving them in day care. Especially because the learning portion of the day is done in Pre-K shortly after nap and it's just free play. I'm not sure why you insist on trying to dictate the time I get to spend with the kids. Please stop asking that I leave them in day care.

Chalese Anderson on 10/16/2019 1:43PM said:

I ask that you leave them at daycare because it makes pickups easier. My time starts at 6pm. Both kids need to be ready to be picked up. Please stop diminishing me as their mother and respect my time

Chalese Anderson on 10/16/2019 1:43PM said:

We have plans tonight that I made over two weeks ago that cannot be changed

Adam Solinger on 10/16/2019 1:45PM said:

Both kids will be ready at 6 when your time starts, just like they always are. Whether they're at day care or with me, that doesn't "diminish" your time. Stop trying to create a false narrative.

Chalese Anderson on 10/16/2019 1:56PM said:

No false narrative on my part.



10/24/2019

Adam Solinger on 10/24/2019 6:42PM said:

I won't be available at 7 tonight. You'll have to call Jessica to talk to the kids.

Chalese Anderson on 10/24/2019 6:46PM said:

I'll note it in my logs

Adam Solinger on 10/24/2019 8:54PM said:

Isn't it already noted via my message? Maq has to change the day he goes to speech therapy because his therapist is leaving. He can either do Tuesday at 6 or Thursday at 6. If it was Thursday, you would obviously have to take him when you have him but it shouldn't be a problem because his new speech therapist is right by his day care. So you can pick Maq up and then take him. So do Thursday's work for you?

10/25/2019

Adam Solinger on 10/25/2019 8:52AM said:

There's a trunk or treat at the day care at 6 pm that Jessica and I wanted to take the kids to. However, I realize that's on your time. Is it ok if we take the kids to that at 6 and then you can pick them up there after they get to trunk or treat. Obviously you can be there too. We just didn't want to take them at 6 and then you pick them up and leave. I just don't want to get their hopes up and then let them down.



Adam Solinger on 10/25/2019 8:59AM said:

And what are your thoughts on Thursday for speech therapy?

Adam Solinger on 10/25/2019 9:08AM said:

I need an answer regarding speech therapy ASAP, they are temporarily holding the spots for me.

Chalese Anderson on 10/25/2019 9:17AM said:

I'll give you an answer in a bit

Chalese Anderson on 10/25/2019 9:19AM said:

That's fine for the trunk or treat. Josh and I will bring the other kids so they can partake as well

Adam Solinger on 10/25/2019 9:32AM said:

Maq and Marie will be in their costumes that I got them. Do you want to use the costumes I got them for Halloween or do you have other plans for their Halloween costumes? We would get no use out of them otherwise.

Chalese Anderson on 10/25/2019 9:53AM said:

They can wear them

Adam Solinger on 10/25/2019 10:00AM said:

Okay, so you will use them for Halloween? Also, I HAVE to let speech therapy know. Do Thursdays at 6 work or no?



Adam Solinger on 10/25/2019 10:06AM said:

I'm just going to schedule it for Tuesday. You've had since yesterday to decide. This isn't a big decision, you either can or can't. I'm not about to lose both spots because you can't let me know if you can take him.

Chalese Anderson on 10/25/2019 10:12AM said:

I'm trying to figure out what I can do with work. Neither of them work because of the location

Adam Solinger on 10/25/2019 10:16AM said:

Tuesday's you don't have him. I was suggesting Thursday's because you are down here anyway to pick up the kids from daycare. You are down this way every other Thursday between 5:30 and 6 anyway if not earlier when you work and put them in daycare. So ultimately you would take him on your days. Nonetheless, I scheduled for Tuesday so we didn't lose both days.

Chalese Anderson on 10/25/2019 4:48PM said:

Can you bring the kids to me after trunk or treat?

Adam Solinger on 10/25/2019 4:50PM said:

So you don't want to go?

Chalese Anderson on 10/25/2019 4:51PM said:

I have to work a little later than expected



Chalese Anderson on 10/25/2019 4:51PM said:

So I don't think I'll make it in time

Adam Solinger on 10/25/2019 4:52PM said:

It starts at 6 and goes until 8:30

Adam Solinger on 10/25/2019 5:07PM said:

How late do you work?

Chalese Anderson on 10/25/2019 5:31PM said:

I'm going to let you guys do this with them tonight. We have stuff planned all weekend and on Halloween itself.

Chalese Anderson on 10/25/2019 5:31PM said:

Can you please meet me somewhere when you guys are done? We can pick a halfway point

Chalese Anderson on 10/25/2019 5:43PM said:

Also, I can't trunk or treat with you at this time. Thank you for the offer though. Things are still too fresh

Adam Solinger on 10/25/2019 5:46PM said:

You realize I already told the kids you were going to be there with the kids and Josh. This wasn't for me it was for the kids so they could go. I offered because it started at 6 when your time started so I didn't want to tell them yes when it was your time.



Chalese Anderson on 10/25/2019 5:51PM said:

How are you turning this around on me? I'm getting off work now. I just told you I can't do this so soon. I'm being generous and offered you guys to do this, if you don't want to then I'll come get them now

Chalese Anderson on 10/25/2019 5:54PM said:

So, would you like to take them with Jessica tonight and meet me half way with them? Or should I head straight there?

Chalese Anderson on 10/25/2019 5:56PM said:

I'm not trying to argue or be difficult

Adam Solinger on 10/25/2019 5:57PM said:

I'm saying that you already said yes. I already told the kids you would be there they were excited. And now all the sudden you can't at the last minute? Which is odd when you already offered Jessica me and Courtney to 4th of July. You made this all complicated, what was supposed to be a fun night for the kids and I wanted to be there for a portion of it but realized it was your time. Now you are telling me that either I take them but have to drive them all the way to you or not let them go so you can get them. I'm obviously not going to disappoint the kids and say we aren't going now, you already let them down tonight by changing your mind, they don't need two parents disappointing them.



Adam Solinger on 10/26/2019 10:40AM sent:

(See attached on page 340)

Adam Solinger on 10/26/2019 11:12AM sent:

(See attached on page 341)

Adam Solinger on 10/26/2019 12:49PM said:

How are the kids doing?

Chalese Anderson on 10/26/2019 12:58PM said:

They are doing great. Both are napping

Chalese Anderson on 10/26/2019 6:28PM said:

Marie is going to bed early. Would you like to call her?

10/27/2019

Adam Solinger on 10/27/2019 3:20PM said:

Are you feeding the kids dinner?

Adam Solinger on 10/27/2019 4:15PM said:

Can you please let me know so I can plan dinner accordingly?

Chalese Anderson on 10/27/2019 4:25PM said:

No. Dinner will not be ready by 6pm tonight for them to eat

Adam Solinger on 10/27/2019 5:56PM said:

I'm outside



Chalese Anderson on 10/27/2019 6:01PM said:

Please let Maq know I'll go get him more green apples for when he comes home next

Adam Solinger on 10/27/2019 8:20PM said:

I'm not sure why every week the same things have to be issues. Once again you didn't bathe the kids this weekend, they need to take baths, their hands alone made the water black from being so dirty. Brushing their teeth is also important, Marie has already lost 2 teeth she doesn't need to lose more. These are basic hygiene needs, you are their mom, you are supposed to be teaching them proper hygiene. It's simple, brush twice a day, floss and mouthwash for Maq. They enjoy baths and brushing their teeth so I don't understand why it's not being done at your house. Secondly, why are you refusing to go over the words/worksheets with Maq? This is what the speech therapist wants him working on, please stop purposely hindering his speech, you are his mom and should want him to succeed in every way possible, not hold him back. Finally, teaching Maq to call people names is unacceptable, he just went on and on about how you told him to call Jessica "old grandma". Why are you teaching him to be mean. Of all the things you should be teaching him; brushing teeth, bathing, and speech, name calling shouldn't be one of them.



Chalese Anderson on 10/27/2019 8:24PM said:

First, basic hygiene is more than taken care of, besides from the mouthwash. The kids were "praking" people by calling them old grandma and old grandpa.

Chalese Anderson on 10/27/2019 8:25PM said:

And they were on the trampoline and playing outside for about two hours, that's why their hands are dirty

Adam Solinger on 10/27/2019 8:39PM said:

Maq specifically said he didn't take a bath or brush his teeth at moms house. That he didn't do his words at moms house and that YOU specifically told him to call Jessica old grandma. When will you learn Chalese? I don't even have to ask Maq anything this kid volunteers all sorts of information constantly. Just like the special drink mommy had this weekend with her friend that he couldn't have any of because it was only for grown ups. Bathe the kids please, brush their teeth and practice his words with him, stop holding this poor kid back. Also, I would like to be part of their haircuts. Maq's is all choppy and uneven around the ears. It probably needs to be shaved, I'll see what the stylist says. They already said to let Marie's hair grow out before they fix it because they will have to cut it extremely short otherwise.

Chalese Anderson on 10/27/2019 8:40PM said:

Have a good night.



Chalese Anderson on 10/27/2019 8:41PM said:

And my special drink, was a rockstar 😊

Adam Solinger on 10/27/2019 8:42PM said:

Since when is a rockstar orange juice with other stuff?

Chalese Anderson on 10/27/2019 8:56PM said:

There wasn't orange juice in my house!!! Stop making shit up.

Chalese Anderson on 10/27/2019 8:58PM said:

Maq also thinks he can do a front flip and has Spider-Man powers 😊 if you have a question on what goes on at my house or what we are consuming please ask me. Stop involving our innocent 4 year old in your shenanigans

Adam Solinger on 10/27/2019 9:16PM said:

I'm not involving Maq in anything. He volunteers this information. Everything you say is a lie, why would I ask you anything. You lie to the court, you lie to me, you lie to the kids, you can't help yourself. You involve him in things by telling him to call Jessica names. Just be a mom and bathe the kids, brush their teeth and practice Maq's words for once.

Chalese Anderson on 10/27/2019 9:19PM said:

I've never once told him to call Jessica anything. Please stop.



Adam Solinger on 10/28/2019 6:27PM said:

So Maq makes all this stuff up, right? You're going to call our son a liar all because you can't find the time or simply dont want to bathe them or brush their teeth. Why does Marie get diaper rash EVERY SINGLE time shes with you? Let me help you answer this one before you start with the, she's allergic to cantaloupe (she eats it constantly at my house with no issue), shes allergic to tomato sauce (she also eats this constantly) she had diarrehia (but didnt have it when I got her 3 hours later) she has sensitive skin and its the diapers/wipes I use (the daycare uses very cheap diapers and wipes). The problem isn't with me when it comes to co-parenting Chalese, it's you. You will constantly lie and make up stories about the kids and not look out for their best interest. It hurts me to watch and see, it breaks my heart everytime I get the kids back and seeing Marie with terrible diaper rash, seeing how dirty and stinky they are from no baths...its so damn sad. So yes, I'm upset that you are accusing me of being a pedophile and telling your friends and family that I am. I'm upset that you involved Jessica in it and tried to damage our relationship with something so disgusting and I will always be upset about that, because that Chalese...that right there is unforgivable. Those are terrible lies you have spread about me and for what? To use it as leverage so you don't have to take a drug test? But here's the thing Chalese, I have never let that affect how I co-parent, not once, nor will I ever. So lets be clear, asking about a drone that you may or may not have, or the FBI may or may not have, or that Lou may or may or



may not have, or that Shapiro may or may not have, or that you may have sold has nothing to do with co-parenting. I will always attempt to co-parent with you, I just hope one day you will want to co-parent with me and that one day you will have their best interest in mind.

10/30/2019

Chalese Anderson on 10/30/2019 12:18PM said:

Can I pick up the kids early?

Chalese Anderson on 10/30/2019 2:32PM said:

Can I go pick them up??

Adam Solinger on 10/30/2019 2:35PM said:

No, Maq has speech therapy at 5.

Adam Solinger on 10/30/2019 2:41PM said:

I'm also just about to leave to go get them to spend some more time with them before pick up.

Chalese Anderson on 10/30/2019 2:47PM said:

I'm off of work. It's ridiculously petty of you to keep playing these games like our children are done kind of pawns

Chalese Anderson on 10/30/2019 2:48PM said:

Also I'm curious to know if you lied in your deposition about being faithful or if you lied to Kelly when you told him that you were unfaithful and he should understand given the line of work you were both in



11/7/2019

Chalese Anderson 661912/ 60 t :2e35 Pi d a

The school is having parent teacher conferences 11/20-11/25 from 10 am to 215, but they're not available from 11 -12. If you would like to attend, please give me three dates and times that work for you and I will see what's available and pick a mutually convenient time. Please let me know ASAP because slots are filling up quickly.

Si aAdgoCdhony d on 661912/ 60 t :2935 Pi d a

I will have to get back to you after I look at my work schedule

Chalese Anderson 661912/ 60 9:/ 635 Pi d a

I'm not home. You'll have to call Jessica to talk to the kids.

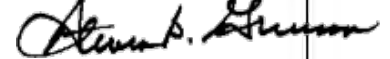
11/8/2019

Chalese Anderson 661412/ 60 7:8035 Pi d a

Since I didn't hear back from you, I signed the kids up for their conferences. Maq's is 11/18 from 1045-11. Marie's is 11/25 at 1030.

Chalese Anderson 661412/ 60 t :/ 635 Pi d a

In the middle of the night, Maq keeps trying to come into our bed to sleep with us. It's really important we don't let him do this because he needs to sleep in his own bed.



1 **ERR**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: Bruce@pecoslawgroup.com

12 **DISTRICT COURT**
13 **CLARK COUNTY, NEVADA**

14 **Adam Michael Solinger,**

15 Plaintiff,

16 vs.

17 **Chalese Marie Solinger,**

18 Defendant.

Case No. **D-19-582245-D**

Dept No. **I**

19 **ERRATA TO EXHIBITS TO**
20 **DEFENDANT'S MOTION FOR A CUSTODY EVALUATION, ATTORNEY'S FEES,**
21 **AND RELATED RELIEF**

22 **COMES NOW** Defendant **Chalese Marie Solinger** ("Chalese") by and
23 through her attorneys, **Bruce I. Shapiro, Esq.** and **Jack W. Fleeman, Esq.** of
24 PECOS LAW GROUP and respectfully submits her errata as follows:

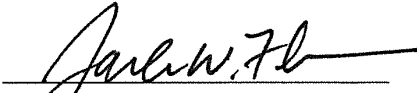
25 . . .

26 . . .

1 On page 2 of Exhibit "A," a document regarding an unrelated matter was
2 inadvertently attached to the pleading. We ask that this document be disregarded.

3 DATED this 15 day of November, 2019.
4

5 PECOS LAW GROUP

6 

7 **Bruce I. Shapiro, Esq.**

8 Nevada Bar No. 004050

9 **Jack W. Fleeman, Esq.**

10 Nevada Bar No. 010584

11 PECOS LAW GROUP

12 8925 South Pecos Road, Suite 14A

13 Henderson, Nevada 89074

14 Attorneys for Defendant
15
16
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW GROUP, and that on this 15th day of November, 2019, I served a copy of ERRATA TO EXHIBITS TO DEFENDANT'S MOTION FOR A CUSTODY EVALUATION, ATTORNEY'S FEES, AND RELATED RELIEF:

☐ By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada: and/or

☒ Pursuant to NEFCR 9, by mandatory electronic service through the Eighth Judicial District Court's electronic filing system: and/or

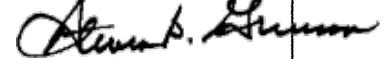
☐ Pursuant to EDCR 7.26, to be sent via facsimile; and/or

☐ To be hand-delivered to the attorneys listed below at the address and/or facsimile number indicated below:

Vincent Mayo	VMGroup@TheAbramsLawFirm.com
admin email	email@pecoslawgroup.com
Jack Fleeman	jack@pecoslawgroup.com
Amy Robinson	amy@pecoslawgroup.com
Angela Romero	angela@pecoslawgroup.com
Alicia Exley	alicia@pecoslawgroup.com
Bruce Shapiro	bruce@pecoslawgroup.com



ANGELA ROMERO,
An employee of PECOS LAW GROUP



1 **RPLY**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 4050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 10584

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12 *Attorneys for Defendant*

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

16 **Adam Michael Solinger,**

17 Plaintiff,

18 vs.

19 **Chalese Marie Solinger,**

20 Defendant.

Case No. **D-19-582245-D**

Dept No. **I**

21 **DEFENDANT'S RESPONSE TO PLAINTIFF'S RESPONSE IN SUPPORT OF**
22 **OPPOSITION TO DEFENDANT'S MOTION FOR TEMPORARY SPOUSAL**
23 **SUPPORT AND PRELIMINARY FEES AND COSTS**

24 COMES NOW Defendant, **Chalese Marie Solinger**, by and through her
25 attorneys of record, **Bruce I. Shapiro, Esq.**, and **Jack W. Fleeman, Esq.** of
26 PECOS LAW GROUP and respectfully submits her DEFENDANT'S RESPONSE TO
PLAINTIFF'S RESPONSE IN SUPPORT OF OPPOSITION TO DEFENDANT'S MOTION FOR
TEMPORARY SPOUSAL SUPPORT AND PRELIMINARY FEES AND COSTS, and requests

1 that this court enter orders granting her the relief requested in her motion and
2 denying Plaintiff's counter-motion.

3 This reply is made and based on all the papers and pleadings on file herein,
4 the Points and Authorities submitted herewith, and the argument as may be
5 adduced at the hearing of this matter.
6

7 DATED this 18th day of November, 2019.

8 PECOS LAW GROUP

9  * 14192

10 **Bruce I. Shapiro, Esq.**

Nevada Bar No. 4050

11 **Jack W. Fleeman, Esq.**

Nevada Bar No. 10584

12 PECOS LAW GROUP

13 8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

14 *Attorneys for Defendant*

1 **POINTS AND AUTHORITIES**

2 **I. REPLY TO OPPOSITION**

3 **A. STATEMENT OF FACTS**

4 The court will note that Adam admits in his response that his father only
5 stopped providing him with his \$5,000.00-per-month allowance in an attempt to
6 try to avoid having Adam to provide support to Chalese. Adam's father, however,
7 has provided the parties with these funds during marriage and it continued until
8 Chalese filed her motion for support. Adam fully admits that his father stopped
9 providing him with this cash only after Chalese started dating someone new. The
10 fact that Adam told his father to stop providing his father this support, or Adam's
11 father stopped on his own, is not relevant at this point.
12

13 Adam also states he "freely disclosed" the fact he has *unfettered* access to
14 his father's credit card for expenses. Adam using his father's credit cards is no
15 different than Adam receiving cash gifts. As an officer of the court, for Adam to
16 state that he has "no control" with his father's credit card statements that he uses
17 border a Rule 11 sanction. Despite stating previously he would provide these
18 statements, Adam is now refusing, again a blatant violation of his duty of candor
19 as an officer of the court. Because Chalese must now subpoena these records and
20 depose Adam's father, this will further increase her fees, which the court should
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1 consider with her request. As has been the pattern in this case, Adam continues to
2 engage in tactics to increase Chalese's fees and expenses.¹

3 Adam testified in his deposition that the parties were "supported by my
4 father" throughout the "vast majority of the marriage."² When asked about
5 Chalese's historical financial contribution to the marriage, Adam stated, "I wasn't
6 involved in her finances to the extent that we were both cared for by my father and
7 everything was taken care of for the vast majority of the relationship and
8 marriage."³ Adam also confirmed at his deposition that Chalese did not need to
9 work throughout their entire relationship and that his estimate of the most Chalese
10 has ever earned is approximately \$20,000.00 yearly.⁴

13 Adam testified his father regularly transferred \$500.00 per week to the
14 parties years ago, "[p]robably since before the marriage."⁵ Adam also testified he
15 did not know why his father stopped these regular transfers, but that he continued
16

18
19 ¹ The court will note Adam's similar game-playing with his girlfriend. On his disclosures,
20 Adam listed his girlfriend's contact information as "c/o Vincent Mayo, Esq.," but when
21 Chalese's counsel attempted to serve Mr. Mayo with Jessica's deposition subpoena, his firm
22 refused service, forcing Chalese to incur more fees in hiring a process server to have her served
23 personally.

24 ² See Excerpts from *Deposition of Adam Solinger* in Defendant's Exhibit Addendum
25 ("DEA") at page 94.

26 ³ See *Id.* at page 97.

⁴ See *Id.*

⁵ See *Id.* at page 114.

1 to pay Adam's attorney's fees and other expenses.⁶ Adam was, therefore, either
2 lying at his deposition about why the regular transfers stopped, or he is lying about
3 them now. It is telling that Adam now will not produce credit card statements
4 showing just how much his father is contributing to his monthly living expenses.
5

6 Adam also testified that, on average, over 2018, his father gave him
7 \$5,000.00 monthly.⁷ Adam became an attorney in 2015, and he earned over
8 \$90,000.00 in 2018. His explanation that his father chose to stop gifting him
9 money now because he has "established himself financially as a lawyer" is
10 nonsensical. It is abundantly clear that Adam instructed his father to stop the cash
11 transfers to avoid having that income imputed to him, but that his father continues
12 to assist Adam with his monthly expenses, including by purchasing a home for
13 Adam to live in.
14

15 As for Chalese's mother, she has loaned Chalese \$80,000.00 for attorney's
16 fees.⁸ While Adam's father provides him an unlimited amount of financial
17 assistance with zero expectation of repayment, Chalese will have to repay these
18 monies to her mother. They are not a "gift." They were provided due to Adam's
19 refusal to support his wife through this process.
20
21
22

23 ⁶ See *Id.* at page 115.

24 ⁷ See *Id.* at page 125.

25 ⁸ See Promissory Note in DEA at bates stamp nos. ("BS") DEF000493-DEF000495.
26

The “soon to be implemented child support guidelines” do not exclude gifts as income. Regardless, Chalese is not arguing here that Adam should have income imputed for child support, but for spousal support. Spousal support is already discretionary; Chalese simply presents this caselaw to show that other courts have held that consistent gifts of funds may be imputed to income for support purposes. If anything, the discretionary nature of spousal support (as opposed to child support) makes this caselaw even stronger in support of Chalese’s spousal support argument.

Adam's "reasonable monthly expenses" are questionable, and the court will note they exceed his net income – yet he is able to pay them without his father's assistance? Adam claims to pay \$400.00 monthly for his electric bill, but his bank statements for July and August show only one payment to NV Energy for \$161.58.⁹ Adam also claims to spend \$400.00 per month on fuel, but his bank statements show a total of \$45.93 spent on fuel from July to August, and \$91.51 from August to September.¹⁰ Adam claims to pay \$280.00 monthly for internet/cable, but his statements show payments to Cox at a total of \$375.64 for two months, which would be only \$187.82 monthly.¹¹ Adam claims to spend

⁹ See Statements for Bank of America account ending in 9724 and card ending in 8236 dated July 2019 to September 2019 in DEA at BS 000880.

¹⁰ See *Id.* at BS 000873-000874, 000880, 000911.

¹¹ See *Id.* at BS 000875, 000881.

1 \$124.82 on gas for his home, but there appear to be no withdrawals from his bank
2 account or credit cards to Southwest Gas for July to September 2019.

3 Thus, Adam's monthly expenses are either exaggerated on his FDF or are
4 being supplemented by his father and/or Jessica, neither of which is accounted for
5 on his FDF. If the court examines Adam's bank statements, however, he had a
6 surplus of \$3,894.16 as of August 12, 2019,¹² and a surplus of \$2,129.65 as of
7 September 10, 2019,¹³ and his credit card had a zero balance as of September 11,
8 2019.¹⁴ If Adam's true expenses were what he claimed (i.e., in excess of his
9 income), Adam would not have money left in his account every month and he
10 would not have a zero-balance credit card.

11 Adam's representations that he has "little net monthly income" after his
12 expenses is demonstrably false. Further, the \$3,894.16 and \$2,129.65 left in
13 Adam's account as of August 12, 2019 and September 10, 2019, respectively,
14 were *after* Adam's payment of \$1,330 in familial support, which he no longer
15 pays. Adam's actual disposable income, not factoring in that support, was
16 therefore \$5,224.16 as of August 12, and \$3,459.65 as of September 10, for an
17 average of \$4,341.91.

18 ¹² See *Id.* at BS 000871.

19 ¹³ See *Id.* at BS 000877.

20 ¹⁴ See *Id.* at BS 000913.

1 Adam's claim that Jessica is "merely on title for privacy purposes" and has
2 "no real interest in the property" is similarly dubious. Adam has presented no
3 written agreement from Jessica waiving her interest in the home. Jessica has
4 interest in the home just by being on title to the home. The more likely explanation
5 here is that Adam's father and Jessica were put on title to prevent Chalese from
6 asserting a community property interest in the home and that they intend to put
7 Adam on title when the divorce is finalized. Had Adam been truly attempting to
8 protect his identify, he simply would have titled the home in the name of a trust or
9 LLC.
10

11
12 The bottom line is that Chalese did not work marriage and has limited
13 earning potential. Chalese is not underemployed. Adam, as stated, admitted in his
14 deposition that the most Chalese has ever made over the course of their
15 relationship (which began when Chalese was 17) was approximately \$20,000.00
16 per year. Chalese has minimal work experience and this is her first job in the last
17 several years. It is easy for Adam to tell Chalese to "just get another job." But the
18 average base pay for a hair stylist in Las Vegas is only \$21,895.00 yearly,
19 according to Glassdoor.com.¹⁵
20

21 Adam's arguments that Chalese should just go work somewhere else
22 therefore fall flat. The court will also note that, while Adam's father apparently
23

24
25 ¹⁵ https://www.glassdoor.com/Salaries/las-vegas-hair-stylist-salary-SRCH_IL.0.9_IM477_KO10.22.htm.

1 believes it took Adam four years to “establish himself” as an attorney, Adam
2 contends Chalese has “established herself” as a hair stylist after a mere six
3 months? Even if this court were to consider only Adam’s salary of \$10,000.00
4 per month, it is five times what Chalese earns. Chalese is entitled to a portion of
5 this community income.
6

7 Chalese admits she made some mistakes early in this litigation. But it is
8 crystal clear from Adam’s deposition that she can literally do nothing to get Adam
9 to agree to joint physical custody – how can he possibly argue that she is the only
10 one driving the cost of litigation?
11

12 As for speech therapy, as indicated in the messages between the parties,
13 Adam asked Chalese if she could take Michael to speech therapy on Thursdays at
14 6:00 p.m. and Chalese did not “refuse to commit” to doing so, she told Adam she
15 was trying to arrange the same with her work schedule (which, it should be noted,
16 Adam believes she should work *more* hours) and, due to Michael’s speech therapy
17 being across town to her workplace, she was unsure if she could get him there on
18 time. This is a perfect example of Adam’s unreasonable demands – that Chalese
19 should work more hours but also be 100% available when he needs her to be.
20

21 The accusations about what four-year-old Michael allegedly told Adam
22 should be disregarded. First, as stated, Michael is four years old and Adam has
23 claimed he told him about “mommy and Josh drinking beer” months ago. Ms.
24
25
26

1 Disaio-Watson has allegedly made a lot of claims in this case, as well as her own
2 case. Her credibility is at issue.

3 The rest of Adam's allegations as to Chalese's parenting show that Adam
4 believes his way of parenting is the only way of parenting. Chalese provided
5 consistent care for both of these children for years without objection from Adam.
6 There is a disparity in lifestyles between the parties due to Adam's significantly
7 higher income and continuing support of his father. Instead of making any effort
8 to co-parent with Chalese, Adam simply makes demands and if Chalese does not
9 acquiesce, Adam accuses her of harming the children. Adam believes that his
10 increased access to financial resources makes him a better parent.
11

12 Chalese knows what Michael needs for his speech therapy – she was solely
13 responsible for it prior to the separation. Chalese knows how to change diapers
14 and bathe the children – she was solely responsible for doing so prior to the
15 separation. Adam constantly blames Chalese for the children – who go to daycare
16 and who she only has two days a week – getting sick or having diaper rashes.
17

18 The messages Adam contends Chalese sends him that are insulting were,
19 again, from months ago. Adam, however, continues to demean and berate Chalese
20 any chance he can get. Adam appears to believe co-parenting means Chalese does
21 what Adam says.
22

23 Chalese is not a "chronic user of marijuana." It is common knowledge that
24 an individual can test positive for marijuana metabolites days to weeks after using
25
26

1 it. Adam admitted in his deposition that he uses marijuana too, and that he used
2 cocaine in college as well. Marijuana is legal in Nevada. Between the parties, the
3 only one who has ever violated state drug laws is Adam.
4

5 As for the representations regarding Chalese's counsel, the analysis of the
6 electronic items is not yet complete. While the court did give a deadline of
7 November 1st, logic would dictate that if there were child pornography on these
8 devices, the court would want to know about it. Adam, and later third parties at
9 Adam's direction, have on more than one occasion showed up, unannounced, at
10 the expert's office demanding the return of these devices. The devices are
11 community property and were left by Adam in the marital home – he is not
12 entitled to simply demand them back. If nothing of concern is found by the
13 experts, they will be disposed of by the court as part of the property division in
14 this case.
15

16
17 Adam then claims that his PI made many discoveries about Chalese and
18 Josh. Adam was, however, ordered to provide full, unredacted reports of the same
19 and it is unclear if he has done so. The occasions on which the PI "witnessed Josh
20 drinking" are either months old or have not been disclosed. Further, the example
21 regarding the smoke shop was not made to deny the purchase but to show the PI's
22 credibility was in question, as he claims he was somehow watching Chalese and
23 speaking to the smoke shop employee at the same time. As for Josh driving the
24
25
26

1 children on Halloween, Chalese denies that this ever occurred, and Adam has not
2 attached or disclosed the report from the PI about it.

3 The video from the June 17, 2019 hearing shows the Court intended for the
4 right of first refusal to go both ways. Regardless, Chalese is not bringing this up in
5 support of an order to show cause, but to show Adam's utter refusal to attempt to
6 co-parent. Further, the court was not "severely concerned about Chalese's ability
7 to care for the children" but was upset its orders were violated. Indeed, the
8 minutes from the June 17, 2019 hearing state "Father shall *temporarily* have
9 primary physical custody (PPC) of the children *until the court sees compliance*
10 *with its orders from Mother.*" The court also denied Adam's request for
11 supervised visitation.
12

13 Despite Adam's allegations that Chalese has caused "irreparable damage"
14 to the children, he testified in his deposition that he would not agree to a child
15 custody evaluation. Further, there has never been a single substantiated CPS claim
16 against Chalese, or a single arrest for neglect. If anything, Chalese believes
17 Adam's intentions of replacing Chalese with Jessica (who Michael calls "mom")
18 that has harmed the children.
19

20 Chalese has not tested positive for benzodiazepines because, as has been
21 explained *ad nauseum*, she only takes them as-needed, and since Adam has made
22 a mountain out of the molehill that is Chalese taking the most widely-prescribed
23 anti-anxiety medication in the United States, she has been hesitant to even use it.
24
25

The court will note that Adam’s opposition and his “response” are nothing but a character attack on Chalese, and they show Adam’s contempt for his wife. Nothing mentioned by Adam in his response has anything to do with Chalese’s request for spousal support except his analysis of the parties’ income and expenses which, as shown, are untrue.

B. LEGAL ARGUMENT

As stated in Chalese's reply, Adam's income is still community property. His bank statements show that he has enough of this income to provide support to Chalese. Adam's many accusations against Chalese do not negate the fact that she is his legal wife and he has a legal obligation to support her during this action. Adam lives in a \$600,000.00 home with an income well over \$10,000.00 per month while Chalese works for \$10.00 per hour. Even if, for the sake of argument, Chalese was able to work 40 hours a week, she would earn a gross income of \$400.00 weekly – less than 20% of what Adam brings home.

Similarly, Adam's arguments regarding fees fall flat. Adam is in a significantly superior financial situation than Chalese and his father is apparently an unlimited source of funds for his own fees. Adam has tried his hardest to use his superior financial position to hinder Chalese legally. She must be awarded fees in order to remain on equal footing through trial.

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DATED this 18th day of November, 2019.

[Signature] 4/4/92

Attorneys for Defendant

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I have read the response and hereby certify that the facts set forth therein are true of my own personal 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 those facts into this Declaration as though fully set forth herein.

DATED this _____ day of November, 2019.

CHALESE SOLINGER

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW
3 GROUP, and that on this 18th day of November, 2019, I served a copy of
4 DEFENDANT'S RESPONSE TO PLAINTIFF'S RESPONSE IN SUPPORT OF OPPOSITION TO
5 DEFENDANT'S MOTION FOR TEMPORARY SPOUSAL SUPPORT AND PRELIMINARY
6 FEES AND COSTS as follows:


7 ☐ By placing same to be deposited for mailing in the United States Mail,
8 in a sealed envelope upon which first class postage was prepaid in Las Vegas,
9 Nevada: and/or

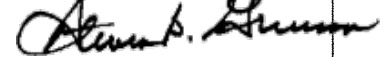
10 ☒ Pursuant to NEFCR 9, by mandatory electronic service through the
11 Eighth Judicial District Court's electronic filing system: and/or

12 ☐ Pursuant to EDCR 7.26, to be sent via facsimile; and/or

13 ☐ To be hand-delivered to the attorneys listed below at the address and/or
14 facsimile number indicated below:

15 Vincent Mayo	VMGroup@TheAbramsLawFirm.com
16 admin email	email@pecoslawgroup.com
17 Jack Fleeman	jack@pecoslawgroup.com
18 Amy Robinson	amy@pecoslawgroup.com
19 Angela Romero	angela@pecoslawgroup.com
20 Alicia Exley	alicia@pecoslawgroup.com
21 Bruce Shapiro	bruce@pecoslawgroup.com

22 
23 _____
24 ALICIA EXLEY,
25 An employee of PECOS LAW GROUP
26



1 **EXHS**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: Bruce@pecoslawgroup.com

12 *Attorneys for Defendant*

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

16 **Adam Michael Solinger,**

17 Plaintiff,

18 vs.

19 **Chalese Marie Solinger,**

20 Defendant.

Case No. **D-19-582245-D**

Dept No. **I**

21 **EXHIBITS TO**
22 **DEFENDANT'S RESPONSE TO PLAINTIFF'S RESPONSE IN SUPPORT OF**
23 **OPPOSITION TO DEFENDANT'S MOTION FOR TEMPORARY SPOUSAL SUPPORT**
24 **AND PRELIMINARY FEES AND COSTS**


25 EXHIBIT A:	Excerpts of <i>Deposition of Adam Solinger</i>	Page nos. 1, 94, 97, 114-115, 125
26 ...		
27 ...		
28 ...		

1	EXHIBIT B:	Promissory Note from Chalese's mother	Bates stamp nos. DEF000493-
2			000495
3	EXHIBIT C:	Bank and Credit Card statements dated July	Bates stamp nos.
4		2019 to September 2019	000871-000882; 000909-000916

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DATED this 16th day of November, 2019.

PECOS LAW GROUP

 #4192

Bruce I. Shapiro, Esq.

Nevada Bar No. 004050

Jack W. Fleeman, Esq.

Nevada Bar No. 010584

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

Attorneys for Defendant

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW GROUP, and that on this 18th day of November, 2019, I served a copy of **EXHIBITS TO DEFENDANT'S RESPONSE TO PLAINTIFF'S RESPONSE IN SUPPORT OF OPPOSITION TO DEFENDANT'S MOTION FOR TEMPORARY SPOUSAL SUPPORT AND PRELIMINARY FEES AND COSTS** as follows:

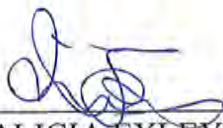
☐ By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada: and/or

☒ Pursuant to NEFCR 9, by mandatory electronic service through the Eighth Judicial District Court's electronic filing system: and/or

☐ Pursuant to EDCR 7.26, to be sent via facsimile; and/or

☐ To be hand-delivered to the attorneys listed below at the address and/or facsimile number indicated below:

Vincent Mayo	VMGroup@TheAbramsLawFirm.com
admin email	email@pecoslawgroup.com
Jack Fleeman	jack@pecoslawgroup.com
Amy Robinson	amy@pecoslawgroup.com
Bruce Shapiro	bruce@pecoslawgroup.com
Alicia Exley	alicia@pecoslawgroup.com
Angela Romero	Angela@pecoslawgroup.com



ALICIA EXLEY,
An employee of PECOS LAW GROUP

EXHIBIT “A”

Adam Solinger - 9/16/2019
Adam Michael Solinger vs. Chalese Marie Solinger

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DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Adam Michael Solinger,)
Plaintiff,)
vs.) Case No.
Chalese Marie Solinger,) D-19-582245-D
Defendant.)
)

DEPOSITION OF ADAM SOLINGER

Taken at the Offices of Pecos Law Group
8925 South Pecos Road, Suite 14A
Henderson, Nevada

On Monday, September 16, 2019
At 1:06 p.m.

Reported by: Jane V. Efaw, CCR #601, RPR

1 She's got the \$36,000 from the sale of the marital
2 residence, which is at least the undisputed amount
3 from that. She also got significant assets from the
4 house related to furniture, home goods, and things
5 like that.

6 Q. So it's your position because of the assets
7 she's receiving as part of the divorce, you shouldn't
8 have to pay any spousal support?

9 A. It's also a very short duration marriage.
10 The vast majority of the marriage, I was not working
11 and I was in school. It wasn't until recently I
12 started working. And all throughout that time, we
13 were supported by my father. Money she made at her
14 various jobs was for fun money. She stopped working
15 in large part because she wanted to.

16 There was a time frame where our son was
17 born, already in day care. And our daughter was not
18 even conceived yet, but there was no effort to return
19 to work or go to school or anything like that.

20 So I believe that based on the short
21 duration, the fact that during that time frame I
22 wasn't working the vast majority of it until I became
23 an attorney and the assets and all that already
24 received, that spousal support would be
25 inappropriate.

1 in Laguna Beach, California.

2 Q. What's the most that she's ever made in a
3 year?

4 A. I don't know. Her income was never
5 something for support. It was always something for
6 her to have fun with and do whatever she wanted with.

7 Q. So you have no idea what's the most she's
8 ever made?

9 A. I mean, I can extrapolate and say probably
10 10 bucks an hour, 40 hours a week, \$400. Like 20
11 grand, give or take.

12 Q. So you'd be comfortable in saying that you
13 don't believe she's ever made more than \$20,000 a
14 year?

15 A. Not that I can think of. I wasn't involved
16 in her finances to the extent that we were both cared
17 for by my father and everything was taken care of for
18 the vast majority of the relationship and marriage.

19 Q. So during the relationship, she really
20 didn't have to work to support you or herself;
21 correct?

22 A. Correct.

23 Q. Now, in your pleadings, you state that she
24 could earn \$3500 per month. Do you recall that?

25 A. I do.

1 I did a lot of that during that month of January.

2 Q. It looks like there's a lot of monthly
3 transfers from your father.

4 A. Yeah.

5 Q. Did he transfer a regular amount to you
6 every month?

7 A. Typically, he transferred \$500 a week. And
8 what had had happened is he was unaware that that was
9 still going on, because they switched systems at Bank
10 of America at some point from their internal system
11 to something called Zelle.

12 And so during that crossover, his automatic
13 transfer got left in there. He didn't realize it,
14 and it never was a topic that we discussed until I
15 said, you know, "There's still money going in.
16 What's going on?"

17 Q. Well, he started the \$500 a week when?

18 A. I don't recall.

19 Q. It's been years?

20 A. Yes.

21 Q. Has it been since marriage?

22 A. Probably since before marriage because that
23 was how I got my college expenses.

24 Q. So at some point, did he intend to stop it
25 or just stop it from this account?

1 **A. He intended to stop it.**

2 **Q. So when did he stop it?**

3 **A. Earlier this year.**

4 **Q. Why did he decide to stop it?**

5 **A. I don't know.**

6 **Q. So he would have stopped it after the**
7 **separation?**

8 **A. Yeah.**

9 **Q. But since the separation, he's paid about**
10 **\$20,000 of your attorney's fees?**

11 **A. Correct.**

12 **Q. And he'd paid \$10,000 to a PI?**

13 **A. Correct.**

14 **Q. Has he paid any other expenses on your**
15 **behalf since he stopped the \$500 a week?**

16 **A. Yeah.**

17 **Q. What other expenses has he paid?**

18 **A. Gas. Just kind of minor miscellaneous**
19 **expenses. I usually call him and say, "Hey, with**
20 **everything going on, things are tight financially,**
21 **would you mind helping me out with this until things**
22 **are over?"**

23 **Q. So is that where you use his credit card?**

24 **A. Correct.**

25 **Q. So how much a month do you average charging**

1 Q. Okay. Page 206. 6/15, \$1500 from your
2 father?

3 A. Correct.

4 Q. 6/18, \$500 from your father?

5 A. Yes.

6 Q. 6/25, \$500 from your father?

7 A. Yes.

8 Q. 7/2, \$1500 from your father?

9 A. Yes.

10 Q. 7/2, \$500 from your father?

11 A. Yes.

12 Q. 7/9, \$500 from your father?

13 A. Yes.

14 Q. 7/11, \$1500 from your father?

15 A. Yes.

16 Q. I'm getting \$6500 for that month.

17 A. It seems accurate without adding it up
18 myself.

19 Q. Okay. 194. I mean, we can go through the
20 rest of these, but would you agree that your father,
21 at least for 2018, gave you an average of about
22 \$5,000 a month?

23 A. Plus or minus, yeah.

24 Q. And would that be the same for 2017?

25 A. No.

EXHIBIT “B”

FLORIDA PROMISSORY NOTE (UNSECURED)

ON THIS 30 DAY OF October, 2019,
Chalese Solinger _____ [Name of Borrower], of
4657 Curdsen Way, Las Vegas, NV [Address of Borrower], hereinafter known as the
"Borrower" promises to pay to Catrina Bolick [Name of
Lender], of 2430 Vanderbilt Beach Rd, Naples FL [Address of Lender], hereinafter known as the
"Lender", the principal sum of eighty thousand Dollars
(\$ 80,000), with interest accruing on the unpaid balance at a rate of
zero percent (0 %) per annum in accordance with Title XXXIX Ch.
687.03 and Ch. 687.071 (Interest and Usury) of the Florida Statutes.

This shall begin as of the date above in the manner that follows:

1. PAYMENTS: Borrower shall pay (check the applicable box)

☐ - **NO INSTALLMENTS.** Payment in full of principal and interest accrued shall be payable on the due date.

☐ - INSTALLMENTS of principal and interest in the amount of
TBD Dollars (\$ TBD)

☐ - **INTEREST ONLY PAYMENTS** on the outstanding principal balance.

If installments or interest only payments are checked above, such installment payment shall be due and payable on the (check the applicable box)

☐ - ____ day of every **month** beginning on the ____ day of _____, 20____.

☐ - Every **week** beginning on the _____ day of _____, 20____.



All payments shall be made to Lender at the address set forth below, unless Borrower is provided with written notice of an alternative address.

2. **DUE DATE:** The full balance on this Note, including any accrued interest and late fees, is due and payable on the 31 day of December, 2036.
3. **INTEREST DUE IN THE EVENT OF DEFAULT:** In the event that the Borrower fails to pay the note, in full, on the due date or has failed to make an installment payment due within 15 days of the due date, unpaid principal shall accrue interest at the rate of zero percent (0 %) per annum OR the maximum rate allowed by law, whichever is less, until the Borrower is no longer in default.
4. **ALLOCATION OF PAYMENTS:** Payments shall be first credited any late fees due, then to interest due and any remainder will be credited to principal.
5. **PREPAYMENT:** Borrower may pre-pay this Note without penalty.
6. **LATE FEES:** If the Lender receives any installment payment more than N/A days after the date that it is due, then a late payment fee of N/A shall be payable with the scheduled installment payment along with any default interest due.
7. **ACCELERATION:** If the Borrower is in default under this Note and fails to make any payment owed and such default is not cured within 30 days after written notice of such default, then Lender may, at its option, shall declare all outstanding sums owed on this Note to be immediately due and payable, in addition to any other rights or remedies that Lender may have under state and federal law.
8. **ATTORNEYS' FEES AND COSTS:** Borrower shall pay all costs incurred by Lender in collecting sums due under this Note after a default, including reasonable attorneys' fees. If Lender or Borrower sues to enforce this Note or obtain a declaration of its rights hereunder, the prevailing party in any such proceeding shall be entitled to recover its reasonable attorneys' fees and costs incurred in the proceeding (including those incurred in any bankruptcy proceeding or appeal) from the non-prevailing party.
9. **WAIVER OF PRESENTMENTS:** Borrower waives presentment for payment, notice of dishonor, protest and notice of protest.



10. NON-WAIVER: No failure or delay by Lender in exercising Lender's rights under this Note shall be considered a waiver of such rights.

11. SEVERABILITY: In the event that any provision herein is determined to be void or unenforceable for any reason, such determination shall not affect the validity or enforceability of any other provision, all of which shall remain in full force and effect.

12. INTEGRATION: There are no verbal or other agreements which modify or affect the terms of this Note. This Note may not be modified or amended except by written agreement signed by Borrower and Lender.

13. NOTICE: Any notices required or permitted to be given hereunder shall be given in writing and shall be delivered (a) in person, (b) by certified mail, postage prepaid, return receipt requested, (c) by facsimile, or (d) by a commercial overnight courier that guarantees next day delivery and provides a receipt, and such notices shall be made to the parties at the addresses listed below.

14. EXECUTION: The Borrower executes this Note as a principal and not as a surety. If there is more than one Borrower, each Borrower shall be jointly and severally liable under this Note.

SIGNATURE AREA

This agreement was signed the 31st day of October, 2019 by the following:

Carolina Jenkins-Balick
Lender's Signature

CAROLINA JENKINS-BALICK
Lender's Printed Name

[Signature]
Witness's Signature

John Marzetti
Witness's Printed Name

Borrower's Signature

Borrower's Printed Name

Witness's Signature

Witness's Printed Name



EXHIBIT “C”



P.O. Box 15284
Wilmington, DE 19850

ADAM M SOLINGER
2970 W SAHARA AVE
LAS VEGAS, NV 89102

Preferred Rewards

Customer service information

1.888.888.RWDS (1.888.888.7937)

TDD/TTY users only: 1.800.288.4408

En Español: 1.800.688.6086

bankofamerica.com

Bank of America, N.A.
P.O. Box 25118
Tampa, FL 33622-5118

Your Adv Plus Banking Preferred Rewards Gold

for July 12, 2019 to August 12, 2019

ADAM M SOLINGER

Account number: [REDACTED] 9724

Account summary

Beginning balance on July 12, 2019	\$5,325.91
Deposits and other additions	7,472.52
ATM and debit card subtractions	-3,839.49
Other subtractions	-5,064.78
Checks	-0.00
Service fees	-0.00
Ending balance on August 12, 2019	\$3,894.16

BANK OF AMERICA

Preferred Rewards



Don't lose your Preferred Rewards benefits

You need to increase your program balance so you can continue to enjoy the benefits of Preferred Rewards.
We're here to help. Talk with a specialist today about how to meet the program requirements at

888.888.RWDS (888.888.7937) and press 2

SSM-04-19-0336D1 | ARSP46DY

Adam Solinger000871

IMPORTANT INFORMATION: BANK DEPOSIT ACCOUNTS

How to Contact Us - You may call us at the telephone number listed on the front of this statement.

Updating your contact information - We encourage you to keep your contact information up-to-date. This includes address, email and phone number. If your information has changed, the easiest way to update it is by visiting the Help & Support tab of Online Banking.

Deposit agreement - When you opened your account, you received a deposit agreement and fee schedule and agreed that your account would be governed by the terms of these documents, as we may amend them from time to time. These documents are part of the contract for your deposit account and govern all transactions relating to your account, including all deposits and withdrawals. Copies of both the deposit agreement and fee schedule which contain the current version of the terms and conditions of your account relationship may be obtained at our financial centers.

Electronic transfers: In case of errors or questions about your electronic transfers - If you think your statement or receipt is wrong or you need more information about an electronic transfer (e.g., ATM transactions, direct deposits or withdrawals, point-of-sale transactions) on the statement or receipt, telephone or write us at the address and number listed on the front of this statement as soon as you can. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

- Tell us your name and account number.
- Describe the error or transfer you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
- Tell us the dollar amount of the suspected error.

For consumer accounts used primarily for personal, family or household purposes, we will investigate your complaint and will correct any error promptly. If we take more than 10 business days (10 calendar days if you are a Massachusetts customer) (20 business days if you are a new customer, for electronic transfers occurring during the first 30 days after the first deposit is made to your account) to do this, we will provisionally credit your account for the amount you think is in error, so that you will have use of the money during the time it will take to complete our investigation.

For other accounts, we investigate, and if we find we have made an error, we credit your account at the conclusion of our investigation.

Reporting other problems - You must examine your statement carefully and promptly. You are in the best position to discover errors and unauthorized transactions on your account. If you fail to notify us in writing of suspected problems or an unauthorized transaction within the time period specified in the deposit agreement (which periods are no more than 60 days after we make the statement available to you and in some cases are 30 days or less), we are not liable to you and you agree to not make a claim against us, for the problems or unauthorized transactions.

Direct deposits - If you have arranged to have direct deposits made to your account at least once every 60 days from the same person or company, you may call us to find out if the deposit was made as scheduled. You may also review your activity online or visit a financial center for information.

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Bank of America, N.A. Member FDIC and  Equal Housing Lender

Adam Solinger000872

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ADAM M SOLINGER | Account # [REDACTED] 9724 | July 12, 2019 to August 12, 2019

Deposits and other additions

Date	Description	Amount
07/15/19	ADP TOTALSOURCE DES:DIRECT DEP ID:700055944794IHJ INDN:SOLINGER,ADAM MICHAEL CO ID:9111111102 PPD	3,736.26
08/01/19	ADP TOTALSOURCE DES:DIRECT DEP ID:927711338939IHJ INDN:SOLINGER,ADAM MICHAEL CO ID:9111111102 PPD	3,736.26
Total deposits and other additions		\$7,472.52

Withdrawals and other subtractions

ATM and debit card subtractions

Date	Description	Amount
07/12/19	CHECKCARD 0711 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799192500720005032	-17.23
07/15/19	CHECKCARD 0711 DEES DONUTS LAS VEGAS NV 24122479193900013100364	-10.23
07/15/19	CHECKCARD 0713 LESLIES POOLMART LAS VEGAS NV 24692169195100029516464	-138.00
07/15/19	ALBERTSONS STO 07/14 #000783989 PURCHASE ALBERTSONS STORE LAS VEGAS NV	-7.77
07/15/19	BKOFAMERICA ATM 07/14 #000007429 WITHDRWL FARM & DURANGO LAS VEGAS NV	-340.00
07/15/19	WHOLEFDS LVB 1 07/15 #000757474 PURCHASE WHOLEFDS LVB 102 LAS VEGAS NV	-64.31
07/16/19	CHECKCARD 0715 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799196100373545289	-9.34
07/16/19	CHECKCARD 0715 JACK IN THE BOX 07268 LAS VEGAS NV 24692169196100953099080	-33.90
07/16/19	CHECKCARD 0715 CREATIVE KIDS ONLINE NOVI MI 24431069197286464100710	-475.00
07/16/19	WHOLEFDS TYA 1 07/16 #000735609 PURCHASE WHOLEFDS TYA 104 LAS VEGAS NV	-26.08
07/18/19	CHECKCARD 0717 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799198500704814080	-17.23
07/18/19	ALBERTSONS STO 07/17 #000551449 PURCHASE ALBERTSONS STORE LAS VEGAS NV	-28.12
07/18/19	TESORO # 62538 07/18 #000287390 PURCHASE TESORO # 62538 LAS VEGAS NV	-3.88
07/18/19	BKOFAMERICA ATM 07/18 #000009354 WITHDRWL FARM & DURANGO LAS VEGAS NV	-300.00
07/18/19	WHOLEFDS TYA 1 07/18 #000820737 PURCHASE WHOLEFDS TYA 104 LAS VEGAS NV	-29.56

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Withdrawals and other subtractions - continued

ATM and debit card subtractions - continued

Date	Description	Amount
07/18/19	CHEVRON/D&C IN 07/18 #000244274 PURCHASE CHEVRON/D&C INCOR LAS VEGAS NV	-3.00
07/18/19	TARGET T- 8750 07/18 #000311119 PURCHASE TARGET T- 8750 W Las Vegas NV	-115.45
07/19/19	WHOLEFDS LVB 1 07/19 #000234195 PURCHASE WHOLEFDS LVB 102 LAS VEGAS NV	-19.57
07/22/19	CHECKCARD 0719 THE LODGE AT GRAND TETO LAS VEGAS NV 24013399200002485879543	-53.44
07/22/19	CHECKCARD 0720 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799201500971737720	-17.23
07/22/19	CHECKCARD 0720 AXS.COM*MGM WWW.AXS.COM CA 24692169201100238570536	-190.70
07/22/19	CHECKCARD 0719 FULL COMPASS SYSTEMS 608-831-7330 WI 24231689200083746120943	-8.74
07/22/19	CHECKCARD 0721 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799202500942763887	-23.48
07/22/19	CHECKCARD 0721 DEL TACO 1095 LAS VEGAS NV 24137469202100198798982	-12.98
07/22/19	TARGET T- 6480 07/22 #000028456 PURCHASE TARGET T- 6480 Sk Las Vegas NV	-31.63
07/23/19	CHECKCARD 0722 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799203500656037923	-25.36
07/23/19	CHECKCARD 0722 CREATIVE KIDS ONLINE NOVI MI 24431069204286464800716	-475.00
07/23/19	7-ELEVEN 07/23 #000343626 PURCHASE 7-ELEVEN LAS VEGAS NV	-12.71
07/24/19	7-ELEVEN 07/24 #000871073 PURCHASE 7-ELEVEN LAS VEGAS NV	-13.50
07/24/19	VIOC 090107 07/24 #000735162 PURCHASE VIOC 090107 LAS VEGAS NV	-24.99
07/24/19	PETSMART # 138 07/24 #000034973 PURCHASE PETSMART # 1381 LAS VEGAS NV	-40.03
07/25/19	CHECKCARD 0724 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799205500705015936	-17.23
07/29/19	CHECKCARD 0725 TACO BELL 031893 LAS VEGAS NV 24431069207838006145351	-16.95
07/29/19	CHECKCARD 0726 WHOOP WWW.WHOOP.COMMA 24492159208637570715712 RECURRING	-30.00
07/30/19	CHECKCARD 0729 CREATIVE KIDS ONLINE NOVI MI 24431069211286464500697	-475.00
08/01/19	CHECKCARD 0731 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799212500700326982	-16.23
08/05/19	MOBILE PURCHASE 0804 US ANESTHESIA PARTNERS 9174709995 NY	-142.50
08/05/19	ALBERTSONS STO 08/04 #000876913 PURCHASE ALBERTSONS STORE LAS VEGAS NV	-13.72
08/06/19	CHECKCARD 0804 TACO BELL 031893 LAS VEGAS NV 24431069217838001323639	-35.07
08/06/19	CHECKCARD 0805 CREATIVE KIDS ONLINE NOVI MI 24431069218286464200689	-475.00
08/06/19	ALBERTSONS STO 08/06 #000921701 PURCHASE ALBERTSONS STORE LAS VEGAS NV	-2.11
08/06/19	ALBERTSONS STO 08/06 #000940447 PURCHASE ALBERTSONS STORE LAS VEGAS NV	-11.85
08/12/19	CHECKCARD 0809 COLD STONE 874 LAS VEGAS NV 24493989222200300601651	-35.37

Total ATM and debit card subtractions

-\$3,839.49

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ADAM M SOLINGER | Account # [REDACTED] 9724 | July 12, 2019 to August 12, 2019

Withdrawals and other subtractions - continued

Other subtractions

Date	Description	Amount
07/19/19	QUICKEN LOANS DES:MTG PYMTS ID:3395765845 INDN:ADAM M. SOLINGER CO ID:9112356513 WEB	-669.01
07/22/19	Bank of America Credit Card Bill Payment	-123.05
07/24/19	Bank of America Credit Card Bill Payment	-567.00
07/24/19	COX COMM LAS DES: BANKDRAFT ID:476069136505001 INDN:Adam Solinger CO ID:1582406705 PPD	-131.88
07/29/19	BANK OF AMERICA CREDIT CARD Bill Payment	-275.00
08/05/19	PAYPAL DES:INST XFER ID:FACEBOOKPAY INDN:ADAM SOLINGER CO ID:PAYPALSI77 WEB	-1,330.00
08/05/19	FARMERS N W LIFE DES:INS. PREM ID:XXXXXXXXX INDN:ADAM SOLINGER CO ID:9576858102 PPD	-171.84
08/06/19	BANK OF AMERICA CREDIT CARD Bill Payment	-1,730.00
08/09/19	PAYPAL DES:INST XFER ID:ADAMPOOTSGA INDN:ADAM SOLINGER CO ID:PAYPALSI77 WEB	-67.00
Total other subtractions		-\$5,064.78

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P.O. Box 15284
Wilmington, DE 19850

ADAM M SOLINGER
2970 W SAHARA AVE
LAS VEGAS, NV 89102

Preferred Rewards

Customer service information

- 1.888.888.RWDS (1.888.888.7937)
TDD/TTY users only: 1.800.288.4408
En Español: 1.800.688.6086
- bankofamerica.com
- Bank of America, N.A.
P.O. Box 25118
Tampa, FL 33622-5118

Your Adv Plus Banking Preferred Rewards Gold

for August 13, 2019 to September 10, 2019

ADAM M SOLINGER

Account number: [REDACTED] 9724

Account summary

Beginning balance on August 13, 2019	\$3,894.16
Deposits and other additions	7,472.52
ATM and debit card subtractions	-4,532.86
Other subtractions	-4,704.17
Checks	-0.00
Service fees	-0.00
Ending balance on September 10, 2019	\$2,129.65

BANK OF AMERICA

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SSM-04-19-0336.D1 | ARSP46DY

Adam Solinger000877

IMPORTANT INFORMATION: BANK DEPOSIT ACCOUNTS

How to Contact Us - You may call us at the telephone number listed on the front of this statement.

Updating your contact information - We encourage you to keep your contact information up-to-date. This includes address, email and phone number. If your information has changed, the easiest way to update it is by visiting the Help & Support tab of Online Banking.

Deposit agreement - When you opened your account, you received a deposit agreement and fee schedule and agreed that your account would be governed by the terms of these documents, as we may amend them from time to time. These documents are part of the contract for your deposit account and govern all transactions relating to your account, including all deposits and withdrawals. Copies of both the deposit agreement and fee schedule which contain the current version of the terms and conditions of your account relationship may be obtained at our financial centers.

Electronic transfers: In case of errors or questions about your electronic transfers - If you think your statement or receipt is wrong or you need more information about an electronic transfer (e.g., ATM transactions, direct deposits or withdrawals, point-of-sale transactions) on the statement or receipt, telephone or write us at the address and number listed on the front of this statement as soon as you can. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

- Tell us your name and account number.
- Describe the error or transfer you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
- Tell us the dollar amount of the suspected error.

For consumer accounts used primarily for personal, family or household purposes, we will investigate your complaint and will correct any error promptly. If we take more than 10 business days (10 calendar days if you are a Massachusetts customer) (20 business days if you are a new customer, for electronic transfers occurring during the first 30 days after the first deposit is made to your account) to do this, we will provisionally credit your account for the amount you think is in error, so that you will have use of the money during the time it will take to complete our investigation.

For other accounts, we investigate, and if we find we have made an error, we credit your account at the conclusion of our investigation.

Reporting other problems - You must examine your statement carefully and promptly. You are in the best position to discover errors and unauthorized transactions on your account. If you fail to notify us in writing of suspected problems or an unauthorized transaction within the time period specified in the deposit agreement (which periods are no more than 60 days after we make the statement available to you and in some cases are 30 days or less), we are not liable to you and you agree to not make a claim against us, for the problems or unauthorized transactions.

Direct deposits - If you have arranged to have direct deposits made to your account at least once every 60 days from the same person or company, you may call us to find out if the deposit was made as scheduled. You may also review your activity online or visit a financial center for information.

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ADAM M SOLINGER | Account # [REDACTED] 9724 | August 13, 2019 to September 10, 2019

Deposits and other additions

Date	Description	Amount
08/15/19	ADP TOTALSOURCE DES:DIRECT DEP ID:701054738711IHJ INDN:SOLINGER,ADAM MICHAEL CO ID:9111111102 PPD	3,736.26
08/30/19	ADP TOTALSOURCE DES:DIRECT DEP ID:698079448929IHJ INDN:SOLINGER,ADAM MICHAEL CO ID:9111111102 PPD	3,736.26
Total deposits and other additions		\$7,472.52

Withdrawals and other subtractions

ATM and debit card subtractions

Date	Description	Amount
08/13/19	CHECKCARD 0812 CREATIVE KIDS ONLINE NOVI MI 24431069225286464900644	-475.00
08/13/19	CHECKCARD 0812 SQ *AMERICAN TOXICO LAS VEGAS NV 24492159224740280480153	-126.00
08/16/19	ALBERTSONS STO 08/15 #000579043 PURCHASE ALBERTSONS STORE LAS VEGAS NV	-32.11
08/19/19	CHECKCARD 0816 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799228200379571214	-8.48
08/19/19	MOBILE PURCHASE 0816 SP * KINGDOM DEATH KINGDOMDEATH.NY	-150.00
08/19/19	MOBILE PURCHASE 0816 SP * KINGDOM DEATH KINGDOMDEATH.NY	-57.00
08/19/19	CHECKCARD 0816 THE RANCH HOUSE LAS VEGAS NV 24137469229100252567504	-18.25
08/19/19	CHECKCARD 0817 DEES DONUTS LAS VEGAS NV 24122479230900016801443	-8.61
08/19/19	CHECKCARD 0818 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799230100449705485	-17.23
08/20/19	CHECKCARD 0818 DEL TACO 1095 LAS VEGAS NV 24137469231100205527163	-37.86
08/20/19	CHECKCARD 0819 CREATIVE KIDS ONLINE NOVI MI 24431069232286464601003	-475.00
08/21/19	MOBILE PURCHASE 0820 UBER TECHNOLOGIES INC 866-576-1039 CA	-16.79
08/22/19	MOBILE PURCHASE 0821 UBER TECHNOLOGIES INC 866-576-1039 CA	-24.81
08/23/19	CHECKCARD 0821 CARL'S JR # 8051 LAS VEGAS NV 24431069234207388501911	-30.46
08/23/19	MOBILE PURCHASE 0822 SP * WHOOP, INC. WHOOPINC.MYSHMA	-84.17

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Withdrawals and other subtractions - continued

ATM and debit card subtractions - continued

Date	Description	Amount
08/23/19	MOBILE PURCHASE 0822 UBER TECHNOLOGIES INC 866-576-1039 CA	-20.80
08/23/19	ALBERTSONS STO 08/23 #000492893 PURCHASE ALBERTSONS STORE LAS VEGAS NV	-3.45
08/26/19	CHECKCARD 0825 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799237100450627175	-17.23
08/27/19	CHECKCARD 0826 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799238500651580785	-23.83
08/27/19	CHECKCARD 0826 CREATIVE KIDS ONLINE NOVI MI 24431069239286464300724	-475.00
08/27/19	MOBILE PURCHASE 0826 UBER TECHNOLOGIES INC 866-576-1039 CA	-24.81
08/28/19	CHECKCARD 0826 WHOOP WWW.WHOOP.COMMA 24492159239637104294138 RECURRING	-30.00
08/28/19	WHOLEFDS TYA 1 08/28 #000616341 PURCHASE WHOLEFDS TYA 104 LAS VEGAS NV	-21.96
08/28/19	STATESIDE EXPR 08/28 #000647500 PURCHASE STATESIDE EXPRE LAS VEGAS NV	-5.08
08/29/19	MOBILE PURCHASE 0828 UBER TECHNOLOGIES INC 866-576-1039 CA	-38.94
08/29/19	MOBILE PURCHASE 0828 UBER TECHNOLOGIES INC 866-576-1039 CA	-20.80
08/30/19	CHECKCARD 0829 TROPICAL SMOOTHIE CAFE LAS VEGAS NV 24269799241200339075754	-17.23
09/03/19	MOBILE PURCHASE 0830 UBER TECHNOLOGIES INC 866-576-1039 CA	-22.81
09/03/19	CHECKCARD 0831 DEL TACO 0871 LAS VEGAS NV 24137469244100669388297	-19.46
09/03/19	TARGET T- 6480 09/01 #000121363 PURCHASE TARGET T- 6480 Sk Las Vegas NV	-19.21
09/03/19	CHECKCARD 0902 CREATIVE KIDS ONLINE NOVI MI 24431069246286464000630	-475.00
09/03/19	STATESIDE EXPR 09/03 #000266348 PURCHASE STATESIDE EXPRE LAS VEGAS NV	-1.59
09/04/19	MOBILE PURCHASE 0903 UBER TECHNOLOGIES INC 866-576-1039 CA	-24.81
09/05/19	CHECKCARD 0903 SUNSHINE VALLEY PEDIATR LAS VEGAS NV 24559309247900017400296	-34.00
09/05/19	CHECKCARD 0904 ASHLEY E HOBAN DMD PLLC LAS VEGAS NV 24431069248207314500155	-177.50
09/06/19	CHECKCARD 0905 SQ *AMERICAN TOXICO LAS VEGAS NV 24492159248740266033002	-127.00
09/09/19	CHECKCARD 0904 UMAMI LAS VEGAS NV 24755429249172491143984	-105.58
09/09/19	COSTCO GAS #07 09/08 #000824617 PURCHASE COSTCO GAS #0737 LAS VEGAS NV	-91.51
09/09/19	COSTCO WHSE #0 09/08 #000020387 PURCHASE COSTCO WHSE #0737 LAS VEGAS NV	-1.28
09/09/19	COSTCO WHSE #0 09/08 #000850334 PURCHASE COSTCO WHSE #0737 LAS VEGAS NV	-697.21
09/10/19	CHECKCARD 0909 CREATIVE KIDS ONLINE NOVI MI 24431069253286464700783	-475.00
Total ATM and debit card subtractions		-\$4,532.86

Other subtractions

Date	Description	Amount
08/13/19	NV ENERGY SOUTH DES: NPC PYMT ID:034735831965925 INDN: ADAM SOLINGER CO ID:1880045330 WEB	-161.58
08/13/19	PAYPAL DES: INST XFER ID: ADAMPOOTSGA INDN: ADAM SOLINGER CO ID:PAYPALS177 WEB	-32.00

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ADAM M SOLINGER | Account # [REDACTED] 9724 | August 13, 2019 to September 10, 2019

Withdrawals and other subtractions - continued

Other subtractions - continued

Date	Description	Amount
08/20/19	PAYPAL DES:INST XFER ID:RPGNOWDTRPG INDN:ADAM SOLINGER CO ID:PAYPALS177 WEB	-30.63
08/22/19	Bank of America Credit Card Bill Payment	-420.61
08/23/19	COX COMM LAS DES: BANKDRAFT ID:476069136505001 INDN:Adam Solinger CO ID:1582406705 PPD	-131.88
08/29/19	COX COMM LAS DES: BANKDRAFT ID:476093475702001 INDN:Adam M Solinger CO ID:1582406705 PPD	-111.88
09/03/19	PAYPAL DES:INST XFER ID:FACEBOOKPAY INDN:ADAM SOLINGER CO ID:PAYPALS177 WEB	-1,330.00
09/05/19	FARMERS N W LIFE DES:INS. PREM ID:XXXXXXXXX INDN:ADAM SOLINGER CO ID:9576858102 PPD	-171.84
09/06/19	Zelle Transfer Conf# cada5e3e2; Dad	-1,500.00
09/06/19	Bank of America Credit Card Bill Payment	-813.75
Total other subtractions		-\$4,704.17

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CASH REWARDS
Visa Signature®

ADAM M SOLINGER
2970 W SAHARA AVE
LAS VEGAS NV 89102-1710



Customer Service Information:

www.bankofamerica.com
1.800.421.2110
TTY: 1.800.346.3178

Mail billing inquiries to:

Bank of America
P.O. Box 982234
El Paso TX 79998-2234

Mail payment to:

Bank of America
P.O. Box 851001
Dallas TX 75285-1001

July 12 - August 11, 2019
Account# [REDACTED] 8236

Account Summary

Previous Balance	\$0.23
Payments and Other Credits	-\$2,695.05
Purchases and Adjustments	\$2,688.57
Fees Charged	\$0.00
Interest Charged	\$0.00

New Balance Total	-\$6.25
Credit balance, please do not pay	

Total Credit Line	\$5,200.00
Total Credit Available	\$5,200.00
Cash Credit Line	\$1,560.00
Portion of Credit Available for Cash	\$1,560.00
Statement Closing Date	08/11/2019
Days in Billing Cycle	31

Payment Information

New Balance Total	-\$6.25
Current Payment Due	\$0.00

Total Minimum Payment Due	\$0.00
Payment Due Date	09/08/2019

Late Payment Warning: If we do not receive your Total Minimum Payment by the date listed above, you may have to pay a late fee of up to **\$38.00** and your APRs may be increased up to the Penalty APR of **29.99%**.
If you would like information about credit counseling services, call 866.300.5238.

11 [REDACTED]

BANK OF AMERICA
P.O. BOX 851001
DALLAS TX 75285-1001

ADAM M SOLINGER
2970 W SAHARA AVE
LAS VEGAS NV 89102-1710

Account Number: [REDACTED] 8236

New Balance Total	-\$6.25
Total Minimum Payment Due	\$0.00
Payment Due Date	09/08/2019

Enter payment amount \$

*For change of address/phone number, see reverse side.
Make your payment online at www.bankofamerica.com or*

Mail this coupon along with your check payable to: Bank of America

Adam Solinger000909

⑆524022250⑆ [REDACTED]

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IMPORTANT INFORMATION ABOUT THIS ACCOUNT

PAYING INTEREST - We will not charge interest on Purchases on the next statement if you pay the New Balance Total in full by the Payment Due Date, and you had paid in full by the previous Payment Due Date. We will begin charging interest on Balance Transfers and Cash Advances on the transaction date.

TOTAL INTEREST CHARGE COMPUTATION - Interest Charges accrue and are compounded on a daily basis. To determine the Interest Charges, we multiply each Balance Subject to Interest Rate by its applicable Daily Periodic Rate and that result is multiplied by the number of days in the billing cycle. To determine the total Interest Charge for the billing cycle, we add the Periodic Rate Interest Charges together. A Daily Periodic Rate is calculated by dividing an Annual Percentage Rate by 365.

HOW WE ALLOCATE YOUR PAYMENTS - Payments are allocated to posted balances. If your account has balances with different APRs, we will allocate the amount of your payment equal to the Total Minimum Payment Due to the lowest APR balances first (including transactions made after this statement). Payment amounts in excess of your Total Minimum Payment Due will be applied to balances with higher APRs before balances with lower APRs.

IMPORTANT INFORMATION ABOUT PAYMENTS BY PHONE - When using the optional Pay-by-Phone service, you authorize us to initiate an electronic payment from your account at the financial institution you designate. You must authorize the amount and timing of each payment. For your protection, we will ask for security information. A fee may apply for expedited service. To cancel, call us before the scheduled payment date. Same-day payments cannot be edited or canceled.

YOUR CREDIT LINES - The Total Credit Line is the amount of credit available for the account; however, only a portion of that is available for Bank Cash Advances. The Cash Credit Line is that amount you have available for Bank Cash Advances. Generally, Bank Cash Advances consist of ATM Cash Advances, Over the Counter (OTC) Cash Advances, Same-Day Online Cash Advances, Overdraft Protection Cash Advances, Cash Equivalents, and applicable transaction fees.

MISCELLANEOUS - Promotional Rate End Date: This date is based on a future statement closing date. If you change your payment due date, this date could change. The New Balance Total which appears on this statement is not a payoff amount and may be subject to additional interest charges when you pay in full after your statement closing date. Please contact the customer service number located on the front of this statement for a pay-off amount. Virtual cards are the digital form of your eligible physical credit cards stored within a digital wallet.

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CALCULATION OF BALANCES SUBJECT TO INTEREST RATE

Average Daily Balance Method (including new Purchases): We calculate separate Balances Subject to an Interest Rate for Purchases and for each Introductory or Promotional Offer balance consisting of Purchases. We do this by: (1) calculating a daily balance for each day in the billing cycle; (2) adding all the daily balances together; and (3) dividing the sum of the daily balances by the number of days in the billing cycle.

To calculate the daily balance for each day in this statement's billing cycle, we: (1) take the beginning balance; (2) add an amount equal to the applicable Daily Periodic Rate multiplied by the previous day's daily balance; (3) add new Purchases, new Account Fees, and new Transaction Fees; and (4) subtract applicable payments and credits. If any daily balance is less than zero we treat it as zero.

Average Balance Method (including new Balance Transfers and new Cash Advances): We calculate separate Balances Subject to an Interest Rate for Balance Transfers, Cash Advances, and for each Introductory or Promotional Offer balance consisting of Balance Transfers or Cash Advances. We do this by: (1) calculating a daily balance for each day in this statement's billing cycle; (2) calculating a daily balance for each day prior to this statement's billing cycle that had a "Pre-Cycle balance" - a Pre-Cycle balance is a Balance Transfer or a Cash Advance with a transaction date prior to this statement's billing cycle but with a posting date within this statement's billing cycle; (3) adding all the daily balances together; and (4) dividing the sum of the daily balances by the number of days in this statement's billing cycle.

To calculate the daily balance for each day in this statement's billing cycle, we: (1) take the beginning balance; (2) add an amount equal to the applicable Daily Periodic Rate multiplied by the previous day's daily balance; (3) add new Balance Transfers, new Cash Advances and Transaction Fees; and (4) subtract applicable payments and credits. If any daily balance is less than zero we treat it as zero.

To calculate a daily balance for each day prior to this statement's billing cycle that had a Pre-Cycle balance: (1) we take the beginning balance attributable solely to Pre-Cycle balance (which will be zero on the transaction date of the first Pre-Cycle balance); (2) add an amount equal to the applicable Daily Periodic Rate multiplied by the previous day's daily balance; (3) and add only the applicable Pre-Cycle balances and their related Transaction Fees. We exclude from this calculation all transactions posted in previous billing cycles.

For the complete terms and conditions of your account, consult your Credit Card Agreement. This account is issued and administered by Bank of America. Bank of America is a registered trademark of Bank of America Corporation.

PAYMENTS - We credit mailed payments as of the date received, if the payment is: (1) received by 5 p.m. local time at the address shown on the remittance portion of your monthly statement; (2) paid with a check drawn in U.S. dollars on a U.S. financial institution or a U.S. dollar money order; and (3) sent in the return envelope with only the remittance portion of your statement accompanying it. Payments received by mail after 5 p.m. local time at the remittance address on any day including the Payment Due Date, but that otherwise meet the above requirements, will be credited as of the next day. Payments made online or by phone will be credited as of the date of receipt if made by 5 p.m. Central. Credit for any other payments may be delayed up to five days. Cash payments made with our tellers or ATM with Teller Assist (ATA) will only be accepted with a valid identification (ID).

No payment shall operate as an accord and satisfaction without the prior written approval of one of our Senior Officers.

We process most payment checks electronically by using the information found on your check. Each check authorizes us to create a one-time electronic funds transfer (or process it as a check or paper draft). Funds may be withdrawn from your account as soon as the same day we receive your payment. Checks are not returned to you.

If you have authorized us to pay your credit card bill automatically from your savings or checking account with us, you can stop the payment on any amount you think is wrong. To stop payment, your letter must reach us at least three business days before the automatic payment is scheduled to occur.

Change of Address/Phone number: Online at www.bankofamerica.com

Please do not add any written communication in this space.

Adam Solinger000910

AB

001157

Transactions

Transaction Date	Posting Date	Description	Reference Number	Account Number	Amount	Total
Payments and Other Credits						
07/20	07/20	PAYMENT - THANK YOU	0117	8236	--123.05	
07/24	07/24	PAYMENT - THANK YOU	0129	8236	--567.00	
07/28	07/29	PAYMENT - THANK YOU	0135	8236	--275.00	
08/05	08/06	PAYMENT - THANK YOU	0141	8236	--1,730.00	
TOTAL PAYMENTS AND OTHER CREDITS FOR THIS PERIOD						-\$2,695.05
Purchases and Adjustments						
07/13	07/15	NETFLIX.COM NETFLIX.COM CA	7399	Virtual Card	12.99	
07/15	07/17	U-HAUL MOVING & STORAGE ALAS VEGAS NV	9002	8236	69.10	
07/16	07/17	CHEVRON 0379599 LAS VEGAS NV	6117	8236	8.27	
07/17	07/18	TROPICAL SMOOTHIE CAFE - LAS VEGAS NV	6914	8236	17.23	
07/18	07/19	TROPICAL SMOOTHIE CAFE - LAS VEGAS NV	8384	8236	15.23	
07/21	07/22	TROPICAL SMOOTHIE CAFE - LAS VEGAS NV	8065	8236	18.23	
07/21	07/22	CHEVRON 0379599 LAS VEGAS NV	3354	8236	4.57	
07/22	07/22	TARGET.COM * 800-591-3869 MN	5601	8236	156.41	
07/20	07/23	U-HAUL MOVING & STORAGE ALAS VEGAS NV	6705	8236	77.48	
07/21	07/23	MCDONALD'S F26516 LAS VEGAS NV	4983	8236	22.17	
07/22	07/24	PUBLICUS LAS VEGAS NV	4336	8236	22.09	
07/22	07/24	ALBERTSONS 4009 LAS VEGAS NV	0990	8236	36.61	
07/22	07/24	SOUTHWES 5262100969594800-435-9792 TX	7189	8236	178.98	
SELLERS/COURTNEY ELL 08/07 SEA/LAS ONEWAY						
07/23	07/24	TROPICAL SMOOTHIE CAFE - LAS VEGAS NV	4419	8236	7.48	
07/23	07/24	MARCOS PIZZA - 7411 LAS VEGAS NV	4583	8236	29.74	
07/23	07/24	WHOLEFDS TYA 10424 LAS VEGAS NV	7001	8236	16.97	
07/24	07/26	TOTAL WINE AND MORE 1204 LAS VEGAS NV	0675	8236	78.41	
07/25	07/26	PELOTON INTERACTIVE HTTPSWWW.ONEPNY	8217	8236	39.00	
07/25	07/27	TLF*FLOWERS BY MICHELLE LAS VEGAS NV	8400	8236	97.37	
07/27	07/29	DEES DONUTS LAS VEGAS NV	0263	8236	17.69	
07/28	07/29	TROPICAL SMOOTHIE CAFE - LAS VEGAS NV	7114	8236	40.39	
07/30	07/31	TROPICAL SMOOTHIE CAFE - LAS VEGAS NV	1835	8236	17.23	
08/02	08/05	STATESIDE EXPRESS LAS VEGAS NV	8966	8236	2.49	
08/03	08/05	IKEA LAS VEGAS RESTAURAN LAS VEGAS NV	0843	8236	27.17	
08/03	08/05	IKEA LAS VEGAS LAS VEGAS NV	9079	8236	1,675.27	
TOTAL PURCHASES AND ADJUSTMENTS FOR THIS PERIOD						\$2,688.57
Interest Charged						
08/11	08/11	INTEREST CHARGED ON PURCHASES			0.00	
08/11	08/11	INTEREST CHARGED ON BALANCE TRANSFERS			0.00	
08/11	08/11	INTEREST CHARGED ON DIR DEP&CHK CASHADV			0.00	
08/11	08/11	INTEREST CHARGED ON BANK CASH ADVANCES			0.00	
TOTAL INTEREST CHARGED FOR THIS PERIOD						\$0.00

2019 Totals Year-to-Date	
Total fees charged in 2019	\$0.00
Total interest charged in 2019	\$0.00

Interest Charge Calculation

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate	Promotional Transaction Type	Promotional Offer ID	Promotional Rate End Date	Balance Subject to Interest Rate	Interest Charges by Transaction Type
Purchases	18.49%V				\$ 0.00	\$ 0.00
Balance Transfers	18.49%V				\$ 0.00	\$ 0.00
Direct Deposit and Check Cash Advances	20.24%V				\$ 0.00	\$ 0.00
Bank Cash Advances	21.49%V				\$ 0.00	\$ 0.00

APR Type Definitions Daily Interest Rate Type: V= Variable Rate (rate may vary)

Important Messages

You have a credit balance and do not need to make a payment on your account.

Your Reward Summary

26.85	Base Cash Back Earned
1.03	Category Bonus Earned
7.01	Relationship Bonus Earned
72.76	Total Cash Back Available

Make the most of your rewards program today!



THE POWER TO

tell America's story through music

We're proud to support *Country Music* — a new Ken Burns film that explores this uniquely American art form. Tune in or stream on PBS, starting Sunday, September 15 at 8/7 Central.

Learn more at bankofamerica.com/CountryMusic.



COUNTRY MUSIC
A FILM BY KEN BURNS

SSM-04-19-0161.B | ARM6TLMW



CASH REWARDS
Visa Signature®

ADAM M SOLINGER
2970 W SAHARA AVE
LAS VEGAS NV 89102-1710



Customer Service Information:

www.bankofamerica.com
1.800.421.2110

TTY: 1.800.346.3178

Mail billing inquiries to:

Bank of America
P.O. Box 982234
El Paso TX 79998-2234

Mail payment to:

Bank of America
P.O. Box 851001
Dallas TX 75285-1001

August 12 - September 11, 2019
Account# [REDACTED] 0505

Account Summary

Previous Balance	-\$6.25
Payments and Other Credits	-\$1,234.36
Purchases and Adjustments	\$1,240.61
Fees Charged	\$0.00
Interest Charged	\$0.00

New Balance Total	\$0.00
Total Credit Line	\$5,200.00
Total Credit Available	\$5,200.00
Cash Credit Line	\$1,560.00
Portion of Credit Available for Cash	\$1,560.00
Statement Closing Date	09/11/2019
Days in Billing Cycle	31

Payment Information

New Balance Total	\$0.00
Current Payment Due	\$0.00

Total Minimum Payment Due	\$0.00
Payment Due Date	10/08/2019

Late Payment Warning: If we do not receive your Total Minimum Payment by the date listed above, you may have to pay a late fee of up to **\$39.00** and your APRs may be increased up to the Penalty APR of **29.99%**.
If you would like information about credit counseling services, call 866.300.5238.

11 [REDACTED]

BANK OF AMERICA
P.O. BOX 851001
DALLAS TX 75285-1001

ADAM M SOLINGER
2970 W SAHARA AVE
LAS VEGAS NV 89102-1710

Account Number: [REDACTED] 0505

New Balance Total	\$0.00
Total Minimum Payment Due	\$0.00
Payment Due Date	10/08/2019

Enter payment amount \$

*For change of address/phone number, see reverse side.
Make your payment online at www.bankofamerica.com or*

Mail this coupon along with your check payable to: Bank of America

Adam Solinger000913

⑆524022250⑆ [REDACTED] ⑆

001160

IMPORTANT INFORMATION ABOUT THIS ACCOUNT

PAYING INTEREST - We will not charge interest on Purchases on the next statement if you pay the New Balance Total in full by the Payment Due Date, and you had paid in full by the previous Payment Due Date. We will begin charging interest on Balance Transfers and Cash Advances on the transaction date.

TOTAL INTEREST CHARGE COMPUTATION - Interest Charges accrue and are compounded on a daily basis. To determine the Interest Charges, we multiply each Balance Subject to Interest Rate by its applicable Daily Periodic Rate and that result is multiplied by the number of days in the billing cycle. To determine the total Interest Charge for the billing cycle, we add the Periodic Rate Interest Charges together. A Daily Periodic Rate is calculated by dividing an Annual Percentage Rate by 365.

HOW WE ALLOCATE YOUR PAYMENTS - Payments are allocated to posted balances. If your account has balances with different APRs, we will allocate the amount of your payment equal to the Total Minimum Payment Due to the lowest APR balances first (including transactions made after this statement). Payment amounts in excess of your Total Minimum Payment Due will be applied to balances with higher APRs before balances with lower APRs.

IMPORTANT INFORMATION ABOUT PAYMENTS BY PHONE - When using the optional Pay-by-Phone service, you authorize us to initiate an electronic payment from your account at the financial institution you designate. You must authorize the amount and timing of each payment. For your protection, we will ask for security information. A fee may apply for expedited service. To cancel, call us before the scheduled payment date. Same-day payments cannot be edited or canceled.

YOUR CREDIT LINES - The Total Credit Line is the amount of credit available for the account; however, only a portion of that is available for Bank Cash Advances. The Cash Credit Line is that amount you have available for Bank Cash Advances. Generally, Bank Cash Advances consist of ATM Cash Advances, Over the Counter (OTC) Cash Advances, Same-Day Online Cash Advances, Overdraft Protection Cash Advances, Cash Equivalents, and applicable transaction fees.

MISCELLANEOUS - Promotional Rate End Date: This date is based on a future statement closing date. If you change your payment due date, this date could change. The New Balance Total which appears on this statement is not a payoff amount and may be subject to additional interest charges when you pay in full after your statement closing date. Please contact the customer service number located on the front of this statement for a pay-off amount. Virtual cards are the digital form of your eligible physical credit cards stored within a digital wallet.

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CALCULATION OF BALANCES SUBJECT TO INTEREST RATE

Average Daily Balance Method (including new Purchases): We calculate separate Balances Subject to an Interest Rate for Purchases and for each Introductory or Promotional Offer balance consisting of Purchases. We do this by: (1) calculating a daily balance for each day in the billing cycle; (2) adding all the daily balances together; and (3) dividing the sum of the daily balances by the number of days in the billing cycle.

To calculate the daily balance for each day in this statement's billing cycle, we: (1) take the beginning balance; (2) add an amount equal to the applicable Daily Periodic Rate multiplied by the previous day's daily balance; (3) add new Purchases, new Account Fees, and new Transaction Fees; and (4) subtract applicable payments and credits. If any daily balance is less than zero we treat it as zero.

Average Balance Method (including new Balance Transfers and new Cash Advances): We calculate separate Balances Subject to an Interest Rate for Balance Transfers, Cash Advances, and for each Introductory or Promotional Offer balance consisting of Balance Transfers or Cash Advances. We do this by: (1) calculating a daily balance for each day in this statement's billing cycle; (2) calculating a daily balance for each day prior to this statement's billing cycle that had a "Pre-Cycle balance" - a Pre-Cycle balance is a Balance Transfer or a Cash Advance with a transaction date prior to this statement's billing cycle but with a posting date within this statement's billing cycle; (3) adding all the daily balances together; and (4) dividing the sum of the daily balances by the number of days in this statement's billing cycle.

To calculate the daily balance for each day in this statement's billing cycle, we: (1) take the beginning balance; (2) add an amount equal to the applicable Daily Periodic Rate multiplied by the previous day's daily balance; (3) add new Balance Transfers, new Cash Advances and Transaction Fees; and (4) subtract applicable payments and credits. If any daily balance is less than zero we treat it as zero.

To calculate a daily balance for each day prior to this statement's billing cycle that had a Pre-Cycle balance: (1) we take the beginning balance attributable solely to Pre-Cycle balance (which will be zero on the transaction date of the first Pre-Cycle balance); (2) add an amount equal to the applicable Daily Periodic Rate multiplied by the previous day's daily balance; (3) and add only the applicable Pre-Cycle balances and their related Transaction Fees. We exclude from this calculation all transactions posted in previous billing cycles.

For the complete terms and conditions of your account, consult your Credit Card Agreement. This account is issued and administered by Bank of America. Bank of America is a registered trademark of Bank of America Corporation.

PAYMENTS - We credit mailed payments as of the date received, if the payment is: (1) received by 5 p.m. local time at the address shown on the remittance portion of your monthly statement; (2) paid with a check drawn in U.S. dollars on a U.S. financial institution or a U.S. dollar money order; and (3) sent in the return envelope with only the remittance portion of your statement accompanying it. Payments received by mail after 5 p.m. local time at the remittance address on any day including the Payment Due Date, but that otherwise meet the above requirements, will be credited as of the next day. Payments made online or by phone will be credited as of the date of receipt if made by 5 p.m. Central. Credit for any other payments may be delayed up to five days. Cash payments made with our tellers or ATM with Teller Assist (ATA) will only be accepted with a valid identification (ID).

No payment shall operate as an accord and satisfaction without the prior written approval of one of our Senior Officers.

We process most payment checks electronically by using the information found on your check. Each check authorizes us to create a one-time electronic funds transfer (or process it as a check or paper draft). Funds may be withdrawn from your account as soon as the same day we receive your payment. Checks are not returned to you.

If you have authorized us to pay your credit card bill automatically from your savings or checking account with us, you can stop the payment on any amount you think is wrong. To stop payment, your letter must reach us at least three business days before the automatic payment is scheduled to occur.

Change of Address/Phone number: Online at www.bankofamerica.com

Please do not add any written communication in this space.

Adam Solinger000914

AB

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Transactions

Transaction Date	Posting Date	Description	Reference Number	Account Number	Amount	Total
Payments and Other Credits						
08/22	08/22	PAYMENT - THANK YOU	0158	0505	-420.61	
09/06	09/06	PAYMENT - THANK YOU	0168	0505	-813.75	
TOTAL PAYMENTS AND OTHER CREDITS FOR THIS PERIOD						-\$1,234.36
Purchases and Adjustments						
08/12	08/13	TROPICAL SMOOTHIE CAFE - LAS VEGAS NV	9946	8236	23.29	
08/13	08/14	NETFLIX.COM NETFLIX.COM CA	2313	8236	12.99	
08/13	08/14	MAXIMUM PEST MANAGEMENT 702-8094893 NV	4106	8236	55.00	
08/14	08/16	NEIMAN MARCUS #15 702-7313636 NV	3650	8236	335.58	
08/23	08/24	TROPICAL SMOOTHIE CAFE - LAS VEGAS NV	0824	8236	15.23	
08/24	08/26	TROPICAL SMOOTHIE CAFE - LAS VEGAS NV	5455	8236	13.94	
08/24	08/26	DEES DONUTS LAS VEGAS NV	0369	8236	15.69	
08/25	08/26	PELTON INTERACTIVE HTTPWWW.ONEPNY	7305	8236	39.00	
08/28	08/29	LEES DISCOUNT LIQUOR LAS VEGAS NV	7056	0505	83.31	
08/28	08/29	JOHNSTON & MURPHY #1801 LAS VEGAS NV	6218	0505	204.59	
08/28	08/30	ALBERTSONS 4009 LAS VEGAS NV	0506	0505	10.54	
08/28	08/30	ALBERTSONS 4009 LAS VEGAS NV	0759	0505	8.98	
08/30	08/31	CREATIVE KIDS 6708 LAS VEGAS NV	0045	0505	15.00	
08/31	09/02	THE LODGE AT GRAND TETON LAS VEGAS NV	9182	0505	79.25	
08/31	09/02	BURGERIM - OSO BLANCA STRIPE.COM CA	8432	0505	25.05	
08/31	09/02	DEES DONUTS LAS VEGAS NV	0473	0505	15.97	
08/31	09/02	LEES DISCOUNT LIQUOR LAS VEGAS NV	7630	0505	162.21	
08/31	09/02	THE HOME DEPOT #3305 LAS VEGAS NV	2859	0505	8.64	
09/01	09/02	TROPICAL SMOOTHIE CAFE - LAS VEGAS NV	1603	0505	24.15	
09/01	09/02	TARGET 00014621 LAS VEGAS NV	8232	0505	11.21	
09/01	09/03	ALBERTSONS 4009 LAS VEGAS NV	0405	0505	69.79	
09/01	09/03	DEES DONUTS LAS VEGAS NV	0926	0505	11.20	
TOTAL PURCHASES AND ADJUSTMENTS FOR THIS PERIOD						\$1,240.61
Interest Charged						
09/11	09/11	INTEREST CHARGED ON PURCHASES			0.00	
09/11	09/11	INTEREST CHARGED ON BALANCE TRANSFERS			0.00	
09/11	09/11	INTEREST CHARGED ON DIR DEP&CHK CASHADV			0.00	
09/11	09/11	INTEREST CHARGED ON BANK CASH ADVANCES			0.00	
TOTAL INTEREST CHARGED FOR THIS PERIOD						\$0.00

2019 Totals Year-to-Date	
Total fees charged in 2019	\$0.00
Total interest charged in 2019	\$0.00

Interest Charge Calculation

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate	Promotional Transaction Type	Promotional Offer ID	Promotional Rate End Date	Balance Subject to Interest Rate	Interest Charges by Transaction Type
Purchases	18.24%V				\$ 0.00	\$ 0.00
Balance Transfers	18.24%V				\$ 0.00	\$ 0.00
Direct Deposit and Check Cash Advances	19.99%V				\$ 0.00	\$ 0.00
Bank Cash Advances	21.24%V				\$ 0.00	\$ 0.00

APR Type Definitions Daily Interest Rate Type: V= Variable Rate (rate may vary)

Your Reward Summary

12.41	Base Cash Back Earned
1.33	Category Bonus Earned
3.47	Relationship Bonus Earned
89.97	Total Cash Back Available

Make the most of your rewards program today!



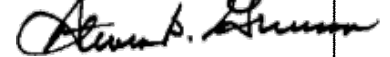

THE POWER TO
tell America's story through music

We're proud to support *Country Music* — a new Ken Burns film that explores this uniquely American art form. Tune in or stream on PBS, starting Sunday, September 15 at 8/7 Central.

Learn more at bankofamerica.com/CountryMusic.




SSM-04-19-0161.B | ARM6TLMW



1 **MOT**

2 **Dawn R. Throne, Esq.**

3 Nevada Bar. No 006145

4 **Michelle A. Hauser, Esq.**

5 Nevada Bar No. 007738

6 **THRONE & HAUSER**

7 1070 W. Horizon Ridge Pkwy., Suite 100

8 Henderson, Nevada 89012

9 Phone: (702) 800-3580

10 Fax: (702) 800-3581

11 Email: dawn@thronehauser.com

12 Attorney for Joshua Lloyd

13 **DISTRICT COURT**

14 **CLARK COUNTY, NEVADA**

15 **ADAM MICHAEL SOLINGER,**

16 Plaintiff

17 vs.

18 **CHALESE MARIE SOLINGER,**

19 Defendant

Case No. **D-19-582245-D**

Dept. No. **I**

DISCOVERY COMMISSIONER

Date of Hearing:

Time of Hearing:

Oral Argument Requested

20 **NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION**
21 **WITH THE CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH A**
22 **COPY OF YOUR RESPONSE WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF**
23 **THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE**
24 **COURT WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION MAY**
25 **RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT**
26 **HEARING PRIOR TO THE SCHEDULED HEARING.**

27 **MOTION FOR PROTECTIVE ORDER**

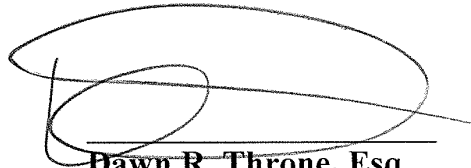
1 COMES NOW, Joshua Lloyd ("Joshua"), by and through his attorney, Dawn
2 R. Throne, Esq., of the law office of THRONE & HAUSER, and respectfully requests
3 that this Court enter orders granting him the following relief:
4

- 5 1. Granting a Protective Order so that witness Joshua Lloyd does not have
6 to appear a second time for Plaintiff to take his deposition;
- 7 2. Awarding attorney's fees and costs; and
- 8 3. Awarding Joshua such other and further relief as this Court may deem
9 appropriate in this matter.
10

11 This motion is made and based on all the papers and pleadings on file herein,
12 the Memorandum of Points and Authorities submitted herewith, and any further
13 evidence and argument as may be adduced at the hearing of this matter.

14 DATED this 19th day of November, 2019.

15 THRONE & HAUSER

16
17
18 

19 Dawn R. Throne, Esq.

20 Nevada Bar. No 006145

Michelle A. Hauser, Esq.

21 Nevada Bar No. 007738

22 1070 W. Horizon Ridge Pkwy., Suite 100

23 Henderson, Nevada 89012

24 (702) 800-3580

25 Attorney for Joshua Lloyd
26
27
28

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TO: Vincent Mayo, Esq. Attorney for Plaintiff

YOU WILL PLEASE TAKE NOTICE that the undersigned will bring the above and foregoing Motion on for hearing before the Court at the Courtroom of the above-entitled Court on the _____ day of _____, 20__, at the hour of _____ _____.m. of said day, before the Discovery Commissioner in Courtroom _____.

DATED this 19th day of November, 2019.


Dawn R. Throne, Esq.

Attorney for Joshua Lloyd

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I**

3 **PROCEDURAL HISTORY AND RELEVANT FACTS**

4
5 Plaintiff, Adam Michael Solinger (“Plaintiff”) and Defendant, Chalese Marie
6 Solinger (“Defendant”) were married on May 12, 2012. A Complaint for Divorce
7 was filed on January 4, 2019 by Plaintiff. Joshua Lloyd is Defendant’s boyfriend in
8 this matter. Joshua has primary custody of his 6 year old son and is the sole source
9 of financial support for him. He also shares custody and financial support of his 3
10 year old daughter with her mother.
11

12 On or about October 29, 2019, Plaintiff served Joshua with a Notice of Taking
13 Deposition for his deposition. Pursuant to the notice, the deposition was originally
14 scheduled to commence on Friday, November 15, 2019, at 1:00 p.m. Based on the
15 notice, Joshua arranged with his employer to take the afternoon off from work in
16 order to attend his deposition.
17

18 Although the notice originally indicated that the deposition was to commence
19 at 1:00 p.m., on approximately Thursday, November 14, 2019, Joshua was advised
20 that the deposition would not start until 3:00 p.m. It should be noted that Joshua was
21 not provided with funds to reimburse him for his travel and a witness fee as required
22 by NRCP 45(b)(1).
23

24 On November 15, 2019, Joshua and his counsel, Dawn R. Throne, Esq.
25 appeared at the law offices of The Abrams & Mayo Law Firm at 3:00 p.m. for
26 Joshua’s deposition. Upon arrival, they were informed that Plaintiff’s attorney would
27 be a little late as he was on his way from court. There they waited until approximately
28

1 4:30 p.m. for Plaintiff's counsel to arrive, at which time they were handed an
2 Amended Notice of Taking Deposition, which purportedly rescheduled the
3 Deposition to December 2, 2019, at 10:00 a.m. *See* exhibit "1." Plaintiff and his
4 attorney never spoke to Counsel prior to rescheduling the deposition to determine
5 Joshua's availability or his counsel's availability.
6

7 II

8 ARGUMENT

9 A. JOSHUA'S DEPOSITION SHOULD NOT BE RESCHEDULED.

10
11 NRCP 26(c) provides:

12 Protective Orders.

13
14 (1) In General. A party or any person from whom discovery is sought
15 may move for a protective order in the court where the action is pending
16 — or as an alternative on matters relating to an out-of-state deposition,
17 in the court for the judicial district where the deposition will be taken.
18 The motion must include a certification that the movant has in good
19 faith conferred or attempted to confer with other affected parties in an
20 effort to resolve the dispute without court action. The court may, for
21 good cause, issue an order to protect a party or person from annoyance,
22 embarrassment, oppression, or undue burden or expense, including one
23 or more of the following:

- 24 (A) forbidding the disclosure or discovery;
- 25 (B) specifying terms, including time and place or the allocation of
26 expenses, for the disclosure or discovery;
- 27 (C) prescribing a discovery method other than the one selected
28 by the party seeking discovery;
- (D) forbidding inquiry into certain matters, or limiting the
scope of disclosure or discovery to certain matters;
- (E) designating the persons who may be present while the
discovery is conducted;

1 (F) requiring that a deposition be sealed and opened only on
2 court order;

3 (G) requiring that a trade secret or other confidential research,
4 development, or commercial information not be revealed or
be revealed only in a specified way; and

5 (H) requiring that the parties simultaneously file specified
6 documents or information in sealed envelopes, to be
7 opened as the court directs.

8 NRS 45 provides specific guideline on how the Discovery Commissioner
9 should handle the quashing of a subpoena. NRS 45(c)(1) provides:

10 A party or attorney responsible for issuing and serving a subpoena must
11 take reasonable steps to avoid imposing undue burden or expense on a
12 person subject to the subpoena. The court that issued the subpoena must
13 enforce this duty and may impose an appropriate sanction-which may
include lost earnings and reasonable attorney fees-on a party or attorney
who fails to comply.

14
15 NRS 45(3)(A)(iv) provides upon a timely motion the court that issued a
16 subpoena must quash or modify the subpoena if it subjects a person to an undue
17 burden.

18
19 Here, the amended notice for Joshua to appear at his deposition should be
20 quashed. Joshua was originally served with a notice on or about October 29, 2019
21 to appear at Plaintiff's attorney's office on Friday, November 15, 2019, at 1:00 p.m.
22 In preparation for his deposition and despite not being compensated as provided by
23 NRCP 45 (b)(1), Joshua in good faith took the afternoon off of work to appear at his
24 deposition. It was not until the day before the deposition that Joshua learned that his
25 deposition would not commence until 3:00 p.m.
26
27
28

1 Joshua and his counsel appeared at Plaintiff's attorney's office promptly on
2 Friday, November 15, 2019. Plaintiff's attorney never showed up to commence the
3 deposition. Joshua was told that he was tied up in court and on his way, therefore,
4 he and his counsel continued to wait until about 4:30 p.m. in the hope that the
5 deposition could be completed. Instead, Plaintiff's counsel unilaterally handed
6 Joshua's counsel and Defendant's counsel with an Amended Notice who were still
7 waiting in the lobby for the deposition to be commenced. A subpoena was not served
8 on Joshua, and to this day, a proper subpoena has not been served on Joshua. Joshua
9 also has not been provided any compensation pursuant to NRCP 45 (b)(1) for his
10 deposition on November 15, 2019.

13 Plaintiff's counsel, without consultation with Defendant's counsel or Joshua's
14 counsel, re-set Joshua's deposition for December 2, 2019, at 10:00 a.m. Joshua has
15 already appeared once for his deposition and forcing him to appear again would be
16 unduly burdensome. Joshua is employed full time and cannot continue to miss work
17 because of Plaintiff's actions. His employer is already unhappy with him for taking
18 off the afternoon of November 15, 2019. Joshua is very concerned that he will lose
19 his job if he is forced to take a second afternoon off for a deposition in this case.

21 Joshua should not be requested to once again rearrange his life and obligations
22 because Plaintiff failed to plan appropriate and take his deposition pursuant to the
23 original notice that was served on him. More importantly, he should not be forced to
24 risk his employment to attend a second deposition when he appeared when and where
25 he was told to for his first deposition. Plaintiff has offered to reimburse Joshua for
26 the attorney's fees he paid and the wages he lost on November 15th, but that will not
27
28

1 compensate him for this loss of his livelihood. Joshua has complied with NRCP 26
2 and EDCR 5.602 in that he has requested that Plaintiff vacate the amended notice and
3 not ask him to attend a second date for his deposition. Plaintiff has refused this
4 request, leaving him no choice but to request protection from this Court from the
5 undue burden.
6

7 It should be noted, Plaintiff is a licensed attorney in the State of Nevada and
8 has significant family resources in addition to his own. As such, he has endless funds
9 to litigate this divorce action. The Defendant, his wife, historically was a stay at
10 home mother, and does not have the financial resources to meet Plaintiff on equal
11 footing during this litigation. Plaintiff simply is driving up legal fees in hopes that
12 Defendant will not have sufficient funds to maintain an attorney to represent her
13 during the pendency of this action. Likewise, nor does Joshua have the financial
14 means to ensure his legal rights are maintained.
15
16

17 Based upon the undue burden it would cause Joshua, Joshua requests that the
18 Court enter a protective order prohibiting him from being required to appear on a
19 second date for his deposition when he already took time off work to attend the first
20 scheduled deposition.
21

22 The deposition for Joshua is currently scheduled to commence at 10:00 a.m.
23 on December 2, 2019, but Plaintiff's counsel has agreed to change the time to 2:00
24 p.m.. Thus, allowing for drive time, if the Court does not enter a protection order,
25 Joshua's counsel should be pre-paid the sum of \$1,500.00 in advance of the
26 deposition. Counsel bills at the hourly rate of \$375. ($\$375 \times 4 \text{ hours} = \$1,500.00$).
27 Joshua should also be pre-paid his witness fee for two days (\$50), his mileage for two
28

1 days (\$14.38) and \$65 for the wages he will lose for taking off another ½ day, for a
2 total of \$129.38. Joshua earns \$650 per week gross income.

3 **B. JOSHUA SHOULD BE AWARDED ATTORNEY'S FEES AND COSTS**

4 NRS 18.010 states:

5 **Award of attorney's fees.**

6
7 1. The compensation of an attorney and counselor for his
8 services is governed by agreement, express or implied, which is not
9 restrained by law.

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

- 12 (a) When he has not recovered more than \$20,000; or
13 (b) Without regard to the recovery sought, when the court
14 finds that the claim, counterclaim, cross-claim or third-party complaint
15 or defense of the opposing party was brought without reasonable
16 ground or to harass the prevailing party.

17 3. In awarding attorney's fees the court may pronounce its
18 decision on the fees at the conclusion of the trial or special proceeding
19 without written motion and with or without presentation of additional
20 evidence.

21 4. No oral application or written motion for attorney's fees
22 alters the effect of a final judgment entered in the action or the time
23 permitted for an appeal therefrom.

24 5. Subsections 2, 3 and 4 do not apply to any action arising
25 out of a written instrument or agreement which entitles the prevailing
26 party to an award of reasonable attorney's fees. (Emphasis added.)
27 EDCR 7.60(b) states in pertinent part:

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

- (1) Presents to the court a motion or an opposition to a
motion which is obviously frivolous, unnecessary or unwarranted; or

- (2) Fails to prepare for a presentation; or
- (3) So multiplies the proceedings in a case as to increase costs unreasonable and vexatiously; or
- (4) Fails or refuses to comply with these rules; or
- (5) Fails or refuses to comply with any order of a judge of the court.

Joshua's counsel complied with EDCR 5.501 and 5.602(d) and attempted to resolve this issue without the need to file this Motion. Joshua hired Attorney Throne just to represent him for the deposition, which did not go forward as scheduled. Joshua and his counsel had to set time away from their work in order to attend said deposition that was rescheduled for a different time last minute. Joshua should be awarded attorney's fees and costs for having to file this underlying motion to request protection from the undue burden Plaintiff seeks to impose upon him.

III

CONCLUSION

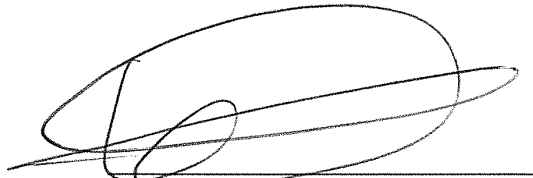
WHEREFORE, based upon the foregoing, the party respectfully requests this Court enter orders granting him the following relief:

1. Granting a Protective Order so that witness Joshua Lloyd does not have to appear a second time for Plaintiff to take his deposition;
2. Awarding Joshua attorney's fees and costs from Plaintiff; and

1 3. Awarding Joshua such other and further relief as this Court may deem
2 appropriate in this matter.

3 **DATED** this 19th day of November, 2019.

4
5 THRONE & HAUSER

6 

7
8 **Dawn R. Throne, Esq.**

9 Nevada Bar. No 006145

10 **Michelle A. Hauser, Esq.**

11 Nevada Bar No. 007738

12 1070 W. Horizon Ridge Pkwy., Suite 100

13 Henderson, Nevada 89012

14 Attorney for Joshua Lloyd

15 **DECLARATION OF DAWN R. THRONE, ESQ.**

16 1. I am an attorney licensed to practice in the State of Nevada, and am
17 counsel for Plaintiff in the above-entitled action; that I make this declaration in
18 support of the foregoing "**MOTION FOR PROTECTIVE ORDER.**"

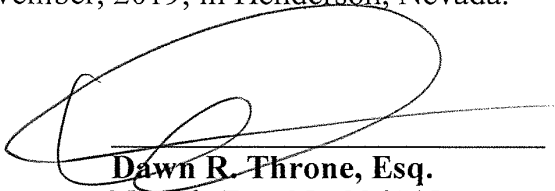
19
20 2. On November 15, 2019, I attended the Deposition with my client Joshua
21 Lloyd which was set for 3:00 p.m at the location of The Abrams & Mayo Law Firm.
22 My client and I waited with Defendant's counsel for Plaintiff's Counsel to arrive for
23 the Deposition. I waited with my client until approximately 4:30 p.m. when I received
24 an Amended Notice of Taking Deposition which states that they were rescheduling the
25 Deposition of my client to a later date.

26 ...

27 ...

1 I declare under penalty of perjury, under the laws of the State of Nevada, that
2 the foregoing is true and correct.

3 Executed this 1st day of November, 2019, in Henderson, Nevada.



Dawn R. Throne, Esq.
Nevada Bar. No 006145
Michelle A. Hauser, Esq.
Nevada Bar No. 007738
1070 W. Horizon Ridge Pkwy., Ste. 100
Henderson, Nevada 89012
Phone: (702) 800-3580
Attorney for Joshua Lloyd

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DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Adam M. Solinger
Plaintiff/Petitioner

v.
Chalese M. Solinger
Defendant/Respondent

Case No. D-19-582245-10

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.

<input type="checkbox"/> \$25	The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
-OR-	
<input checked="" type="checkbox"/> \$0	The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
<input checked="" type="checkbox"/>	The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
<input type="checkbox"/>	The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
<input type="checkbox"/>	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 _____.
<input type="checkbox"/>	Other Excluded Motion (must specify) _____.

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

<input checked="" type="checkbox"/> \$0	The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
<input checked="" type="checkbox"/>	The Motion/Opposition is being filed in a case that was not initiated by joint petition.
<input type="checkbox"/>	The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
-OR-	
<input type="checkbox"/> \$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-	
<input type="checkbox"/> \$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.

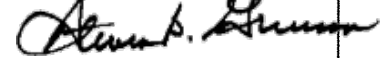
Step 3. Add the filing fees from Step 1 and Step 2.

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: Attorney for Witness Date 11/19/19

Signature of Party or Preparer 



1 **APPL**
2 **Dawn R. Throne, Esq.**
3 Nevada Bar No. 006145
4 **Michelle A. Hauser, Esq.**
5 Nevada Bar No. 007738
6 **THRONE & HAUSER**
7 1070 W. Horizon Ridge Pkwy, Ste. 100
8 Henderson, Nevada 89012
9 Phone: (702) 800-3580
10 Fax: (702) 800-3581
11 Email: samantha@thronehauser.com
12 Attorney for Joshua Lloyd

13 **DISTRICT COURT**
14 **CLARK COUNTY, NEVADA**

15 **ADAM MICHAEL SOLINGER,**

16 Plaintiff

17 vs.

18 **CHALESE MARIE SOLINGER,**

19 Defendant

Case No. **D-19-582245-D**

Dept. No. **I**

DISCOVERY COMMISSIONER

Date of Hearing:

Time of Hearing:

20 **APPLICATION FOR ORDER SHORTENING TIME**

21 Pursuant to EDCR 5.513, this application is hereby made for an order
22 shortening time within which the **"MOTION FOR PROTECTIVE ORDER"**
23 may be heard.

24 **DATED** this 20 day of November, 2019

25 **THRONE & HAUSER**



26 **Dawn A. Throne, Esq.**
27 Nevada Bar No. 006145
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1 scheduled deposition and appeared for that deposition. His employer is already
2 unhappy with him for taking off the afternoon of November 15, 2019. Joshua is very
3 concerned that he will lose his job if he is forced to take a second afternoon off for a
4 deposition in this case.

5
6 Joshua should not be requested to once again rearrange his life and obligations
7 because Plaintiff failed to plan appropriately and take his deposition pursuant to the
8 original notice that was served on him. More importantly, he should not be forced to
9 risk his employment to attend a second deposition when he appeared when and where
10 he was told to for his first deposition. Because of the undue burden it would cause
11 Joshua, Joshua is requesting that the Court enter a protective order prohibiting him
12 from being required to appear on a second date for his deposition when he already
13 took time off work to attend the first scheduled deposition.

14
15 Because the deposition is set to be conducted on December 2, 2019, it is crucial
16 that Joshua's Motion for Protective Order be heard before that date. Joshua
17 respectfully requests that this Court grant him an Order Shortening Time in order to
18 have the hearing on his Motion before the date of the rescheduled deposition.

19
20 **DATED** this 20 day of November, 2019.

21
22 THRONE & HAUSER

23
24 

25 **Dawn R. Throne, Esq.**
26 Nevada Bar No. 006145
27 1070 W. Horizon Ridge Pkwy., Suite 100
28 Henderson, Nevada 89012
(702) 800-3580
Attorney for Joshua Lloyd

Steven D. Grierson

1 **OST**
2 **Dawn R. Throne, Esq.**
3 Nevada Bar No. 006145
4 **Michelle A. Hauser, Esq.**
5 Nevada Bar No. 007738
6 **THRONE & HAUSER**
7 1070 W. Horizon Ridge Pkwy., Suite 100
8 Henderson, Nevada 89012
9 (702) 800-3580
10 (702) 800-3581 facsimile
11 email:dawn@thronehauser.com
12 Attorney for Joshua Lloyd

9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 **ADAM MICHAEL SOLINGER,**

12
13 Plaintiff

14 vs.

15
16 **CHALESE MARIE SOLINGER,**

17 Defendant
18

Case No. **D-19-582245-D**

Dept. No. **I**

DISCOVERY COMMISSIONER

Date of Hearing:

Time of Hearing:

19
20 **ORDER SHORTENING TIME**

21 **UPON A READING** of the application of **Dawn R. Throne, Esq.**, of **THRONE**
22 **& HAUSER**, attorney for Joshua Lloyd herein, and good cause appearing therefore:

23 **IT IS HEREBY ORDERED** that the time for hearing of Joshua Lloyd's
24 **"Motion for Protective Order"** the same hereby is, shortened, and that said matter
25 shall be heard on the 6th day of December, 2019, at the hour of 1:00
26 p.m. before the Family Court Discovery Commission. Courtroom #15
27
28

RECEIVED
NOV 20 2019
DISCOVERY

IT IS FURTHER ORDERED that the hearing previously scheduled upon said motion is hereby vacated.

DATED this 20th day of November, 2019.

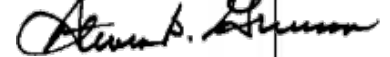
Discovery Commissioner Pro Tem

Submitted by:

THRONE & HAUSER

A handwritten signature in black ink, appearing to be "S. S.", written over a horizontal line. The first letter is a large capital "S" followed by a smaller "S".

Dawn R. Throne, Esq.
Nevada Bar No. 006145
Michelle A. Hauser, Esq.
Nevada Bar No. 007738
1070 W. Horizon Ridge Pkwy., Ste. 100
Henderson, Nevada 89012
(702) 800-3580
Attorney for Plaintiff



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,)	
11)	
	Defendant.)	

12
13 **SUPPLEMENTAL APPENDIX OF EXHIBITS IN SUPPORT OF**
14 **PLAINTIFF'S RESPONSE IN SUPPORT OF OPPOSITION TO**
DEFENDANT'S MOTION FOR TEMPORARY SPOUSAL
SUPPORT AND PRELIMINARY FEES AND COSTS

15 ///

16 ///

17 ///

18 ///

19 ///

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21 ///

1	Exhibit	Description
2	9	Zillow for Chalese's Mom's house
3	10	Collier County Property Appraiser report for Chalese's Mom's house
4	11	Zillow for Adam's Dad's house

5 Dated Thursday, November 21, 2019.

6 Respectfully Submitted,
THE ABRAMS & MAYO LAW FIRM

7 /s/ Vincent Mayo, Esq.
8 Vincent Mayo, Esq. (8564)
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
9 Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *SUPPLEMENTAL APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFF'S RESPONSE IN SUPPORT OF OPPOSITION TO DEFENDANT'S MOTION FOR TEMPORARY SPOUSAL SUPPORT AND PRELIMINARY FEES AND COSTS* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Thursday, November 21, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Bruce I. Shapiro, Esq.
Attorney for Defendant

/s/ Chantel Wade
An Employee of The Abrams & Mayo Law Firm

EXHIBIT 9

EXHIBIT 9

EXHIBIT 9

CORRECT HOME FACTS

SAVE

SHARE






MORE

CLOSE

Public View

Owner View

Florida · Naples · 34119 · Golden Gate · 5225 Mahogany Ridge Dr

5225 Mahogany Ridge Dr Naples, FL 34119

-- beds · -- baths · 5,065 sqft

Note: This property is not currently for sale or for rent on Zillow. The description below may be from a previous listing.

Recently built Gulfstream Homes custom designed home in highly desirable Logan Woods and one of the only near new properties in the area. The private access road is gated and the 3 acre "square" property is unique for the area, giving you full use of the entire property! This 4 BR+ Den/3BA was designed with family living in mind and is finished with Gulfstream quality. The extraordinary kitchen, with granite counter tops and custom cabinetry, is the centerpiece of this custom

[More](#)

SOLD: \$1,200,000
Sold on 10/30/17
Zestimate®
\$1,205,291

EST. MORTGAGE
\$4,551/mo

[Get pre-qualified](#)

Home Shoppers are Waiting

145 shoppers are looking in your neighborhood and price range.

Your name

Phone

Email

I own this home and would like to ask an agent about selling 5225 Mahogany Ridge Dr,

[Contact Agent](#)

Or call 239-645-4470 for more info

Facts and Features

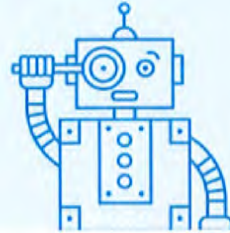
Type Single Family	Year Built 2011	Heating Heat pump
Cooling	Parking	Lot

Nearby Similar Sales

SOLD: \$1,200,000
Sold on 10/30/19
6 bds, 8 ba, 7,710 sqft
[4190 Teak Wood Dr Apt A Naples FL 34119](#)

It looks like this property has **missing facts**, which can affect the accuracy of home value estimates.

Is this your home? [Claim it](#) and update home facts!



Zestimate
\$1,205,291



ZESTIMATE RANGE
\$1.06M - \$1.37M



LAST 30 DAY CHANGE
+\$8,724 (+0.7%)



ONE YEAR FORECAST
\$1,211,438 (+0.5%)

[Zestimate history & details](#) ▼

Price / Tax History ▼

Neighborhood: Golden Gate ▼

Home Expenses ▼

Nearby Schools in Naples ▼



State Farm[®] Home Insurance
Save more when you combine home & auto.

[Find An Agent](#) ↗

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Home Shoppers are Waiting



145 shoppers are looking in your neighborhood and price range.

EXHIBIT 10

EXHIBIT 10

EXHIBIT 10



- Home Page
- About Abe Skinner
- GIS Maps
- Search Database
- Exemptions
- Tangible Personal Property
- Mobile Home
- Agricultural
- Static Maps
- More Information
- Contact Us
- Forms
- Links

Collier County Property Appraiser

REFRESH

FEEDBACK

- Print
- New Search
- Tax Bills
- Change of Address

- Property Summary
- Property Detail
- Aerial
- Sketches
- Trim Notices

Parcel No 23897000054

Site Address 5225 MAHOGANY RIDGE DR

Site City NAPLES

Site Zone 34119

Name / Address

BOLICK, NICHOLAS GEORGE

CATRINA JENKINS

5225 MAHOGANY RIDGE DR

City NAPLES

State FL

Zip 34119-2531

Map No. 4809

Strap No. 183700 14809

Section 9

Township 49

Range 26

Acres 2.87

Legal BELLA WOODS LOT 1

Millage Area 0.45

Sub./Condo 183700 - BELLA WOODS IN UNIT 32

Use Code 01 - SINGLE FAMILY RESIDENTIAL

Millage Rates 0.45

School 5.083

Other 6.4933

Total 11.5763

2019 Certified Tax Roll

(Subject to Change)

Land Value

(-) Improved Value \$ 285,565

(-) Market Value \$ 641,557

(-) Assessed Value \$ 927,122

(-) Homestead \$ 25,000

(-) School Taxable Value \$ 902,122

(-) Additional Homestead \$ 25,000

(-) Taxable Value \$ 877,122

Latest Sales History

(Not all Sales are listed due to Confidentiality)

Date Book Page Amount

10/27/17 5444-888 \$ 1,200,000

02/02/05 3726-2773 \$ 435,000

03/09/95 2037-1064 \$ 0

08/01/93 1859-2139 \$ 0

06/01/93 1835-489 \$ 140,000

If all Values shown above equal 0 this parcel was created after the Final Tax Roll

EXHIBIT 11

EXHIBIT 11

EXHIBIT 11

CORRECT HOME FACTS

SAVE

SHARE

MORE

CLOSE

Public View

Owner View

Nevada · Carson City · 89703 · 2139 Court Side Cir

2139 Court Side Cir

Carson City, NV 89703

5 beds · 3.5 baths · 2,997 sqft

OFF MARKET

Zestimate®: \$577,480

Rent Zestimate®: \$2,386 /mo

EST. REFI PAYMENT

\$2,092/mo

See current rates

2139 Court Side Cir, Carson City, NV is a single family home that contains 2,997 sq ft and was built in 1995. It contains 5 bedrooms and 3.5 bathrooms. The Zestimate for this house is \$577,480, which has increased by \$679 in the last 30 days. The Rent Zestimate for this home is \$2,386/mo, which has decreased by \$19/mo in the last 30 days.

Facts and Features

Type

Single Family

Year Built

1995

Heating

No Data

Cooling

No Data

Parking

Attached Garage

Lot

9,583 sqft

INTERIOR FEATURES

Bedrooms

Beds: 5

Flooring

Floor size: 2,997 sqft

SPACES AND AMENITIES

Size

Other Interior Features

Fireplace

Home Shoppers are Waiting

11 shoppers are looking in your neighborhood and price range.

Your name

Phone

Email

I own this home and would like to ask an agent about selling 2139 Court Side Cir, Carson City,

Contact Agent

Or call 775-204-0545 for more info

Nearby Similar Sales

SOLD: \$585,000

Sold on 02/12/19

4 bds, 3 ba, 2,483 sqft

1680 Evergreen Dr, Carson City, NV 89703

SOLD: \$625,000

Sold on 07/12/19

5 bds, 3 ba, 2,923 sqft

1731 Evergreen Dr, Carson City, NV 89703

SOLD: \$565,000

Sold on 09/08/19

4 bds, 3 ba, 2,626 sqft

2016 Ashwood Ct, Carson City, NV 89703

001191

CORRECT HOME FACTS

SAVE

SHARE

MORE

CLOSE

See More Facts and Features

Home Value

Zestimate
\$577,480



ZESTIMATE RANGE
\$543,000 - \$612,000



LAST 30 DAY CHANGE
+\$679 (+0.1%)



ONE YEAR FORECAST
\$607,971 (+5.3%)

Zestimate history & details

Price / Tax History



Neighborhood: 89703



Home Expenses



Nearby Schools in Carson City



Sold on 09/08/19
4 bds, 3 ba, 2,626 sqft
2016 Ashwood Ct, Carson City, NV 89703

SOLD: \$569,000
Sold on 03/29/19
4 bds, 3 ba, 2,771 sqft
1580 Robb Dr, Carson City, NV 89703

SOLD: \$580,000
Sold on 07/24/19
4 bds, 3.5 ba, 2,592 sqft
2929 Esser Ct, Carson City, NV 89703



State Farm® Home Insurance
Save more when you combine home & auto.

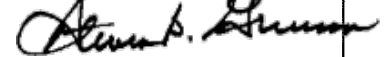
Find An Agent

Sponsored

Home Shoppers are Waiting



11 shoppers are looking in your neighborhood and price range.



1 **NEOJ**
2 **Dawn R. Throne, Esq.**
Nevada Bar No. 006145
3 **Michelle A. Hauser, Esq.**
Nevada Bar No. 007738
4 **THRONE & HAUSER**
5 1070 W. Horizon Ridge Pkwy., Suite 100
Henderson, Nevada 89012
6 (702) 800-3580
(702) 800-3581 Facsimile
7 email:dawn@thronehauser.com
8 Attorney for Joshua Lloyd

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

12 **Adam Michael Solinger,**

13
14 Plaintiff,

15 vs.

16 **Chalese Marie Solinger,**

17
18 Defendant.

Case No. **D-19-582245-D**
Dept. No. **I**

DISCOVERY COMMISSIONER

Date of Hearing: **December 6, 2019**
Time of Hearing: **1:30 p.m.**

19
20 **NOTICE OF ENTRY OF ORDER SHORTENING TIME**

21 YOU WILL PLEASE TAKE NOTICE that a “**Order Shortening Time**” was
22 entered in the above-captioned case on the 21st day of **November, 2019**, by filing
23 a copy with the Clerk.
24

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A true and correct copy of said Order is attached hereto and made a part thereof.

DATED this 21st day of November, 2019.

THRONE & HAUSER



Dawn R. Throne, Esq.
Nevada Bar No. 006145
Michelle A. Hauser, Esq.
Nevada Bar No. 007738
1070 W. Horizon Ridge Pkwy., Suite 100
Henderson, Nevada 89012
(702) 800-3580
Attorney for Joshua Lloyd

1 **CERTIFICATE OF SERVICE**

2 A COPY OF "Notice of Entry of Order" in the above-captioned matter was
3 served this date via electronic service, Pursuant to NEFCR 9 as follows:
4

5 Vincent Mayo, Esq.
6 VMGroup@TheAbramsLawFirm.com
Attorney for Plaintiff

7 Bruce Shapiro, Esq.
8 Admin@pecoslawgroup.com
9 Attorney for Defendant

10 DATED this 21 day of November, 2019.

11
12 
13 _____
14 An employee of THRONE & HAUSER
15
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Steven D. Grierson

1 **OST**
2 **Dawn R. Throne, Esq.**
3 Nevada Bar No. 006145
4 **Michelle A. Hauser, Esq.**
5 Nevada Bar No. 007738
6 **THRONE & HAUSER**
7 1070 W. Horizon Ridge Pkwy., Suite 100
8 Henderson, Nevada 89012
9 (702) 800-3580
10 (702) 800-3581 facsimile
11 email:dawn@thronehauser.com
12 Attorney for Joshua Lloyd

9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 **ADAM MICHAEL SOLINGER,**

12 Plaintiff

13 vs.

14 **CHALESE MARIE SOLINGER,**

15 Defendant

Case No. **D-19-582245-D**

Dept. No. **I**

DISCOVERY COMMISSIONER

Date of Hearing:

Time of Hearing:

19 **ORDER SHORTENING TIME**

20
21 **UPON A READING** of the application of **Dawn R. Throne, Esq.**, of **THRONE**
22 & **HAUSER**, attorney for Joshua Lloyd herein, and good cause appearing therefore:

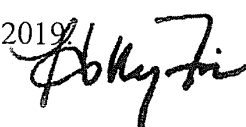
23 **IT IS HEREBY ORDERED** that the time for hearing of Joshua Lloyd's
24 "Motion for Protective Order" the same hereby is, shortened, and that said matter
25 shall be heard on the 6th day of December, 2019, at the hour of 1:00
26 p.m. before the Family Court Discovery Commission. *Courtroom #15*
27
28

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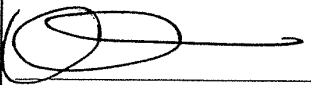
IT IS FURTHER ORDERED that the hearing previously scheduled upon said motion is hereby vacated.

DATED this 20th day of November, 2019

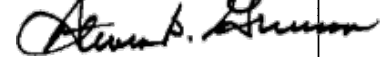

MB
Discovery Commissioner Pro Tem

Submitted by:

THRONE & HAUSER



Dawn R. Throne, Esq.
Nevada Bar No. 006145
Michelle A. Hauser, Esq.
Nevada Bar No. 007738
1070 W. Horizon Ridge Pkwy., Ste. 100
Henderson, Nevada 89012
(702) 800-3580
Attorney for Plaintiff



1 **EPAP**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: Bruce@pecoslawgroup.com

12 *Attorneys for Defendant*

13 **DISTRICT COURT**
14 **CLARK COUNTY, NEVADA**

15 **Adam Michael Solinger,**

16 Plaintiff,

17 vs.

18 **Chalese Marie Solinger,**

19 Defendant.

Case No. **D-19-582245-D**

Dept No. **I**

Date of Hearing: **January 21, 2020**

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

20 **EX PARTE APPLICATION FOR AN ORDER SHORTENING TIME ON**
21 **DEFENDANT'S MOTION FOR A CUSTODY EVALUATION, ATTORNEY'S FEES,**
22 **AND RELATED RELIEF**

23 COMES NOW Defendant, **Chalese Marie Solinger** by and through her
24 attorneys, **Bruce I. Shapiro, Esq.** and **Jack W. Fleeman, Esq.**, of the law firm
25 PECOS LAW GROUP, and respectfully moves that, pursuant to EDCR 5.513, the
26 Court shorten time in which to hear DEFENDANT'S MOTION FOR A CUSTODY
EVALUATION, ATTORNEY'S FEES, AND RELATED RELIEF.

1 This application is made and based on all the papers and pleadings on file
2 herein and the affidavit of counsel attached hereto.

3 DATED this 20 day of November, 2019.

4 PECOS LAW GROUP

5 
6
7 **Bruce I. Shapiro, Esq.**

8 Nevada Bar No. 004050

9 **Jack W. Fleeman, Esq.**

10 Nevada Bar No. 010584

11 PECOS LAW GROUP

12 8925 South Pecos Road, Suite 14A

13 Henderson, Nevada 89074

14 *Attorneys for Defendant*

15 **AFFIDAVIT OF COUNSEL**

16 STATE OF NEVADA)

17)ss:

18 COUNTY OF CLARK)

19 BRUCE I. SHAPIRO, ESQ., being duly sworn, deposes and says:

20 1. I am an attorney of good standing duly licensed in Nevada. I am an attorney
21 of record for Defendant.

22 2. Plaintiff **Adam Michael Solinger** ("Adam") and Defendant **Chalese Marie**
23 **Solinger** ("Chalese") are married and have two children: **Michael Solinger**, born
24 June 16, 2015 and **Marie Solinger**, born August 28, 2017.


25 3. As described more fully in her motion, Adam testified at his deposition that
26 he believes it is better for the children to spend time with his new girlfriend than

1 with Chalese, and that he believes Chalese should have four hours per week
2 supervised visitation with the children.

3 4. Adam has been repeatedly leaving the children with his girlfriend in the
4 mornings and in the evenings. Adam also frequently interferes with Chalese's 7:00
5 p.m. phone calls with the children.
6

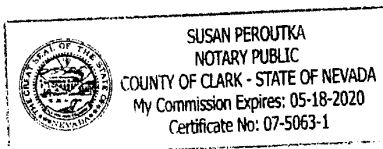
7 5. Based on this evidence, which suggests Adam seeks to replace his girlfriend
8 as the children's mother, a child custody evaluation is desperately needed in this
9 case.
10

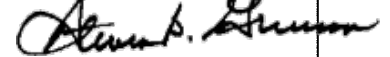
11 6. The hearing date for this motion was set for January 21, 2020, which is after
12 trial is scheduled for this case. Due to the fact that trial is set for January and time
13 for an evaluation is needed, Chalese respectfully requests that this court place this
14 matter on its earliest judicial calendar.
15

16
17 
Bruce I. Shapiro, Esq.

18 This instrument was acknowledged before
19 me this 21st day of November, 2019.

20 
21 NOTARY PUBLIC in and for said
22 County and State





1 **JOIN**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: Bruce@pecoslawgroup.com

12 *Attorneys for Defendant*

**DISTRICT COURT
CLARK COUNTY, NEVADA**

13 **Adam Michael Solinger,**

14 Plaintiff,

15 vs.

16 **Chalese Marie Solinger,**

17 Defendant.

Case No. **D-19-582245-D**

Dept No. **I**

Hearing Date: **December 6, 2019**

Hearing Time: **1:00 p.m.**

**BEFORE THE DISCOVERY
COMMISSIONER**

**DEFENDANT'S JOINDER TO JOSHUA LLOYD'S MOTION FOR PROTECTIVE
ORDER**

AND


COUNTERMOTION FOR FEES FROM PLAINTIFF TO DEFENDANT

21 **COMES NOW** Defendant **Chalese Marie Solinger** ("Chalese") by and
22 through her attorneys, **Bruce I. Shapiro, Esq.** and **Jack W. Fleeman, Esq.** of
23 PECOS LAW GROUP and hereby submits her *Defendant's Joinder to Joshua Lloyd's*
24 *Motion for Protective Order and Countermotion for Fees from Plaintiff to*
25 *Defendant.*
26

1 Defendant's joinder and counter-motion is made and based upon all the
2 papers and pleadings on file herein, the attached Points and Authorities, and any
3 other evidence and argument as may be adduced at the hearing of this matter.
4

5 DATED this 22nd day of November, 2019.

6 PECOS LAW GROUP

7  #14298

8 **Bruce I. Shapiro, Esq.**

9 Nevada Bar No. 004050

10 **Jack W. Fleeman, Esq.**

11 Nevada Bar No. 010584

12 PECOS LAW GROUP

13 8925 South Pecos Road, Suite 14A

14 Henderson, Nevada 89074

15 Attorneys for Defendant
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1 POINTS AND AUTHORITIES

2 **A. STATEMENT OF FACTS**

3 Plaintiff **Adam Michael Solinger** (“Adam”) and Defendant **Chalese Marie**
4 **Solinger** (“Chalese”) married on May 12, 2012 and separated in late 2018. They
5 have two children: **Michael Solinger**, born June 16, 2015, and **Marie Solinger**,
6 born August 28 ,2017.
7

8 After the parties separated, Adam briefly resided in an apartment, then
9 moved in with his new girlfriend, Jessica. In early 2019, Chalese began a romantic
10 relationship with **Joshua Lloyd** (“Joshua”), with whom Chalese is still in
11 romantic relationship and with whom Chalese resides. As stated by Joshua in his
12 motion, he has primary physical custody of his six-year-old son, and joint physical
13 custody of his three-year-old daughter.
14

15 Upon learning that Chalese was in a relationship with someone new, Adam
16 began his campaign of harassment against both Chalese and Joshua. Adam has
17 hired a private investigator to follow Chalese and Joshua, and this private
18 investigator has been following Chalese and Joshua from April 2019 through
19 October 2019 and possibly continues to do so. The investigator has been providing
20 Adam with both written reports as well as videotapes of Chalese and Joshua. He
21 also had his investigator place GPS trackers on Chalese’s vehicles to track her
22 movement.
23
24

1 Additionally, Adam apparently accessed Joshua's custody case with the
2 mother of his daughter, Carmen, and included allegations Carmen made against
3 Joshua in the custody case, allegations which Joshua denies, and which were made
4 prior to Carmen stipulating to giving Joshua joint physical custody of their child,
5 in pleadings in his case against Chalese. Adam then, upon information and belief,
6 contacted Carmen personally, and Carmen began sending Adam communications
7 between herself and Joshua and herself and Chalese.
8

9 After trial was continued, Adam subpoenaed Carmen for a deposition,
10 setting the deposition for December 2, 2019 at 1:00 p.m. Adam has also
11 subpoenaed Carmen for trial in January 2020. The point of these facts is to show
12 that Adam has been very focused on Joshua in his divorce litigation against
13 Chalese.
14

15 On October 29, 2019, without the courtesy of having requested dates on
16 Chalese's counsel might be available, Adam served Joshua with a deposition
17 subpoena commanding him to a deposition on November 15, 2019 at 1:00 p.m.
18 On November 13, 2019 in the afternoon, Mr. Mayo contacted Chalese's counsel
19 and stated, "I have a hearing that has been placed on calendar for this Friday at
20 1:30 p.m. It cannot be moved, and Jennifer is unavailable to cover it. Therefore, I
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1 will need to start Mr. Lloyd's depo at 3:00 p.m. instead of 1:30 p.m.”¹ Mr.
2 Fleeman responded and informed Mr. Mayo that he would alert Chalese, but that
3 he needed to leave that day no later than 5:00 p.m.²

4
5 Due to Mr. Fleeman's 5:00 p.m. obligation, Ms. Exley was the attorney who
6 traveled to Mr. Mayo's office on November 15, 2019 at approximately 2:30 p.m.
7 to attend the deposition, arriving at his office at approximately 2:50 p.m. At 2:42
8 p.m. that day, Mr. Mayo emailed Mr. Fleeman, stating, “Hey Jack, I'm trying to
9 leave court – May be a little late.”³

10
11 Joshua and his counsel, Ms. Throne, arrived at Mr. Mayo's office shortly
12 after Ms. Exley. Ms. Throne, Joshua, and Ms. Exley were then informed that Mr.
13 Mayo was on his way from court and would be a little late. Ms. Throne, Joshua,
14 and Ms. Exley waited at Mr. Mayo's office for him to arrive until around 4:30
15 p.m. *They were then told Mr. Mayo would not be able to make it and handed an*
16 *Amended Notice of Taking Deposition, which set Joshua's deposition for*
17 *December 2, 2019 at 10:00 a.m.* This amended notice of deposition was again set
18 without the courtesy of verifying that the parties or attorneys were available.
19
20
21

22 ¹ See email from Mr. Mayo to Mr. Fleeman in Defendant's Exhibit Addendum (“DEA”) at
23 bates stamp nos. (“BS”) DEF000510.

24 ² See *Id.* at DEF000511.

25 ³ See *Id.* at DEF000512.

1 On November 19, 2019, Ms. Exley called Mr. Mayo to inquire about
2 whether Adam would be reimbursing Chalese her fees for having to pay counsel
3 to travel to and wait at Mr. Mayo's office on November 15, 2019. Mr. Mayo
4 affirmed that Adam would reimburse Chalese her fees \$660.00 for Ms. Exley to
5 travel to and wait at Mr. Mayo's office. This conversation was memorialized in an
6 email sent that day at 11:27 a.m., shortly after the phone call occurred.⁴

8 At 2:55 p.m., Mr. Mayo responded to the email stating, "This was based on
9 re-noticing Josh's deposition. It appears Josh is now refusing to appear for his re-
10 noticed deposition."⁵ Ms. Exley informed Mr. Mayo that "Mr. Lloyd's
11 cooperation with your subpoena does not negate the fact that our client incurred
12 fees last week when you failed to appear at the deposition. If Adam refuses to pay
13 the requested fees, we will be filing a motion."⁶ No response was received to that
14 email, and Chalese's counsel was subsequently served with Joshua's motion for a
15 protective order.
16

18 Chalese agrees that Joshua, in good faith, took off work to appear at his
19 deposition. She also agrees that if Joshua loses his job, his children will be
20 negatively affected.
21

22
23 ⁴ See *Id.* at DEF000513.

24 ⁵ See *Id.* at DEF000514.

25 ⁶ See *Id.* at DEF000515.

1 It should be noted that Adam has not paid any attorney's fees to Chalese in
2 this matter. Adam receives a salary of over \$10,000.00 monthly, has seemingly
3 unlimited access to his father's credit card for other expenses, has a contribution to
4 his living expenses from his girlfriend, and testified in his deposition that his
5 father has paid the entirety of his attorney's fees and private investigator's fees
6 without expectation of repayment. Chalese was a stay-at-home mother through
7 much of the parties' marriage, never earning more than \$20,000.00 yearly, and
8 currently works cutting hair for \$10.00 per hour. She has had to borrow
9 \$80,000.00 from her mother for attorney's fees for this case and is not receiving
10 *any* financial support from Adam.
11

12
13 Further, upon information and belief, Mr. Mayo was aware of his
14 November 15, 2019 hearing weeks before he even subpoenaed Joshua to attend a
15 deposition on November 15, 2019 at the same time as his 1:30 p.m. hearing.
16

17 Despite all of this, Adam refuses to reimburse Chalese the \$660.00 she
18 incurred when his attorney failed to appear at the November 15, 2019 deposition,
19 causing Chalese to incur even more fees to request these fees from the court.
20 Adam should be sanctioned for his unreasonable behavior, Joshua's motion should
21 be granted, and Chalese should be awarded fees.
22

23 ...

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1 **B. LEGAL ARGUMENT**

2 **1. Joshua's Motion Should Be Granted.**

3 As cited by Joshua in his motion, NRCp 26(c) allows this court to “issue an
4 order to protect a party or person from annoyance, embarrassment, oppression, or
5 undue burden or expense” by forbidding or limiting discovery. Chalese contends
6 that Adam has subjected Joshua to a substantial amount of annoyance,
7 embarrassment, oppression, and undue burden and expense in this matter, from
8 having him followed by a private investigator to obtaining pleadings from his
9 custody case and colluding with the mother of Joshua's daughter (with whom
10 Joshua was, until recently, embroiled in his own custody litigation) to gather “dirt”
11 on Joshua. Per Chalese, these actions have caused both Chalese and Joshua
12 significant stress over the last few months.

13 This stress was compounded after Mr. Mayo forced Joshua to take off work
14 to appear for a deposition (for which Joshua was not paid to attend), then failed to
15 conduct the deposition, commanding Joshua to take off a second day of work to
16 appear again. Chalese agrees with Joshua that if he loses his job, it will negatively
17 impact Joshua's own children. Joshua's motion for a protective order should be
18 granted.

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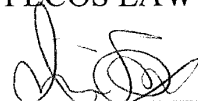
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CONCLUSION

WHEREFORE, based on the foregoing, Chalese respectfully submits her
Defendant's Joinder to Joshua Lloyd's Motion for Protective Order and
Countermotion for Fees from Plaintiff to Defendant.

DATED this 22 day of November, 2019.

PECOS LAW GROUP

 1199

Bruce I. Shapiro, Esq.

Nevada Bar No. 004050

Jack W. Fleeman, Esq.

Nevada Bar No. 010584

PECOS LAW GROUP

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

Attorneys for Defendant

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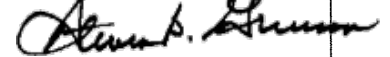
1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW
3 GROUP, and that on this 22nd day of November, 2019, I served a copy of
4 DEFENDANT'S JOINDER TO JOSHUA LLOYD'S MOTION FOR PROTECTIVE ORDER AND
5 COUNTERMOTION FOR FEES FROM PLAINTIFF TO DEFENDANT as follows:

6 ☒ Pursuant to NEFCR 9, by mandatory electronic service through the
7 Eighth Judicial District Court's electronic filing system to:

8 Vincent Mayo	VMGroup@TheAbramsLawFirm.com
9 admin email	email@pecoslawgroup.com
10 Jack Fleeman	jack@pecoslawgroup.com
11 Amy Robinson	amy@pecoslawgroup.com
12 Angela Romero	angela@pecoslawgroup.com
13 Alicia Exley	alicia@pecoslawgroup.com
14 Bruce Shapiro	bruce@pecoslawgroup.com
15 Meghan Allen	officeassist2@thronehauser.com
16 Michelle A. Hauser	michelle@thronehauser.com
17 Susan Pinjuv	paralegal@thronehauser.com
18 Nicole S	receptionist@thronehauser.com
19 Nicole Sandoval	officeassist@thronehauser.com

20 
21 _____
22 ALICIA EXLEY,
23 An employee of PECOS LAW GROUP
24



EXHS
Bruce I. Shapiro, Esq.
Nevada Bar No. 004050
Jack W. Fleeman, Esq.
Nevada Bar No. 010584
PECOS LAW GROUP
8925 South Pecos Road, Suite 14A
Henderson, Nevada 89074
Telephone: (702) 388-1851
Facsimile: (702) 388-7406
Email: Bruce@pecoslawgroup.com
Attorneys for Defendant

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Adam Michael Solinger,

Plaintiff,

vs.

Chalese Marie Solinger,

Defendant.

Case No. **D-19-582245-D**

Dept No. **I**

Hearing Date: **December 6, 2019**

Hearing Time: **1:00 p.m.**

**BEFORE THE DISCOVERY
COMMISSIONER**

EXHIBITS TO
DEFENDANT'S JOINDER TO JOSHUA LLOYD'S MOTION FOR PROTECTIVE
ORDER AND COUNTERMOTION FOR FEES FROM PLAINTIFF TO DEFENDANT

EXHIBIT A:	Correspondence between counsel re: Deposition of Joshua Lloyd and Fees	Bates stamp nos. DEF000510 – DEF000515
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1492

Attorneys for Defendant

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW GROUP,
3 and that on this 22nd day of November, 2019, I served a copy of **EXHIBITS**
4 **TO DEFENDANT'S JOINDER TO JOSHUA LLOYD'S MOTION FOR**
5 **PROTECTIVE ORDER AND COUNTERMOTION FOR FEES FROM**
6 **PLAINTIFF TO DEFENDANT** as follows:
7

8
9 ☒ Pursuant to NEFCR 9, by mandatory electronic service through the Eighth
10 Judicial District Court's electronic filing system to:

11 Vincent Mayo	VMGroup@TheAbramsLawFirm.com
12 admin email	email@pecoslawgroup.com
13 Jack Fleeman	jack@pecoslawgroup.com
14 Amy Robinson	amy@pecoslawgroup.com
15 Angela Romero	angela@pecoslawgroup.com
16 Alicia Exley	alicia@pecoslawgroup.com
17 Bruce Shapiro	bruce@pecoslawgroup.com
18 Meghan Allen	officeassist2@thronehauser.com
19 Michelle A. Hauser	michelle@thronehauser.com
20 Susan Pinjuv	paralegal@thronehauser.com
21 Nicole S	receptionist@thronehauser.com
22 Nicole Sandoval	officeassist@thronehauser.com


23
24 
25 _____
26 ALICIA EXLEY,
27 An employee of PECOS LAW GROUP
28

EXHIBIT “A”

From: Vincent Mayo <vmayo@theabramslawfirm.com>
Date: November 13, 2019 at 1:17:52 PM PST
To: Jack Fleeman <Jack@pecoslawgroup.com>
Cc: Angela Romero <angela@pecoslawgroup.com>, Julie Schoen <JSchoen@theabramslawfirm.com>
Subject: Solinger

PERSONAL AND CONFIDENTIAL

The information contained in this e-mail is from The Abrams & Mayo Law Firm which may be confidential and may also be attorney-client privileged. The information is intended for the use of the individual or entity to whom it is addressed and others who have been specifically authorized to receive it. If you are not the intended recipient, you are hereby instructed to return this e-mail unread and delete it from your inbox and recycle bin. You are hereby notified that any disclosure, dissemination, distribution, use or copying of the contents of this information is strictly prohibited.

Hello,

I have a hearing that has been placed on calendar for this Friday at 1:30 p.m. It cannot be moved and Jennifer is unavailable to cover it. Therefore, I will need to start Mr. Lloyd's depo at 3:00 p.m. instead of 1:30 p.m. I know that you do not represent Mr. Lloyd but could you do me the favor of having Chalese notify him and confirming same? Being that it will result in his deposition being shorter than it would have been, I would assume he would not have an issue with it.

Sincerely,

Vincent Mayo, Esq.
Board Certified Family Law Specialist
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
www.TheAbramsLawFirm.com

DEF000510

001217

From: Jack Fleeman <Jack@pecoslawgroup.com>
Sent: Wednesday, November 13, 2019 2:35 PM
To: Vincent Mayo <vmayo@theabramslawfirm.com>
Cc: Angela Romero <angela@pecoslawgroup.com>; Julie Schoen <JSchoen@theabramslawfirm.com>;
Email <email@pecoslawgroup.com>; Alicia Exley <alicia@pecoslawgroup.com>
Subject: RE: Solinger

I will let Chalese know. Please be aware that I will be the attorney at the deposition and I must leave no later than 5:00 p.m. Based on your prior emails stating that the deposition will start at 3:00 p.m. and will go no more than two hours, I assume that is not a problem.

Jack W. Fleeman / ATTORNEY AT LAW
STATE BAR OF NEVADA CERTIFIED FAMILY LAW SPECIALIST



Henderson Office
8925 SOUTH PECOS ROAD, SUITE 14A
HENDERSON, NEVADA 89074
PHONE: (702) 388-1851
FAX: (702) 388-7406
EMAIL: JACK@PECOSLAWGROUP.COM

Summerlin Office
5594 S. FORT APACHE ROAD, SUITE 120
LAS VEGAS, NEVADA 89148

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DEF000511

001218

From: Vincent Mayo <vmayo@theabramslawfirm.com>
Sent: Friday, November 15, 2019 2:42 PM
To: Jack Fleeman <Jack@pecoslawgroup.com>
Subject: Solinger

PERSONAL AND CONFIDENTIAL

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Hey Jack,

I'm trying to leave court - May be a little late.

Sent from my iPhone

DEF000512

001219

From: Alicia Exley
Sent: Tuesday, November 19, 2019 11:27 AM
To: Vincent Mayo <vmayo@theabramslawfirm.com>
Cc: Email <email@pecoslawgroup.com>; Bruce Shapiro <bruce@pecoslawgroup.com>; Jack Fleeman <jack@pecoslawgroup.com>
Subject: Solinger v. Solinger

Dear Mr. Mayo,

Per our phone conversation, this email will confirm that Adam will agree to reimburse Chalese \$660.00 for legal fees incurred during Josh Lloyd's first noticed deposition on November 15, 2019. Please advise when payment will be made.

Sincerely,

Alicia Exley | ATTORNEY



8925 SOUTH PECOS ROAD, SUITE 14A
HENDERSON, NEVADA 89074
PHONE: (702) 388-1851
FAX: (702) 388-7406
EMAIL: ALICIA@PECOSLAWGROUP.COM

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DEF000513

001220

From: Vincent Mayo <vmayo@theabramslawfirm.com>
Sent: Tuesday, November 19, 2019 2:55 PM
To: Alicia Exley <alicia@pecoslawgroup.com>
Subject: RE: Solinger v. Solinger

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This was based on re-noticing Josh's deposition. It appears Josh is now refusing to appear for his re-noticed deposition.

Sincerely,

Vincent Mayo, Esq.
Board Certified Family Law Specialist
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
www.TheAbramsLawFirm.com

DEF000514

001221

From: Alicia Exley
Sent: Tuesday, November 19, 2019 3:31 PM
To: Vincent Mayo <vmayo@theabramslawfirm.com>
Cc: Email <email@pecoslawgroup.com>; Bruce Shapiro <bruce@pecoslawgroup.com>; Jack Fleeman <jack@pecoslawgroup.com>; Angela Romero (angela@pecoslawgroup.com) <angela@pecoslawgroup.com>
Subject: RE: Solinger v. Solinger

Mr. Mayo,

Mr. Lloyd's cooperation with your subpoena does not negate the fact that our client incurred fees last week when you failed to appear at the deposition. If Adam refuses to pay the requested fees, we will be filing a motion.

Sincerely,

Alicia Exley | ATTORNEY



8925 SOUTH PECOS ROAD, SUITE 14A

HENDERSON, NEVADA 89074

PHONE: (702) 388-1851

FAX: (702) 388-7406

EMAIL: ALICIA@PECOSLAWGROUP.COM

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DEF000515

001222